

Epping Forest District Council Representations to the Draft Local Plan Consultation 2016 (Regulation 18)

Stakeholder ID	3975	Name	Louisa Smith	JLL on behalf of Aberdeen Asset Management
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Method	Letter
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Date	12/12/2016
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Letter or Email Response:

We write on behalf of our client (Aberdeen Asset Management) in response to the Epping Forest District Draft Local Plan Consultation. We hereby enclose a completed copy of the 'Call for Sites' proforma, providing details of a potential development site located on the south eastern edge of Waltham Abbey. We believe the site provides an excellent opportunity to assist with the much needed delivery of homes in the District, achieving wider community benefits and in a preferable location to the current proposed sites in the Draft Local Plan. A plan is attached to the proforma identifying the extent of the proposed site. The proposed development site is circa 13 hectares and is located to the south of Honey Lane. The site forms the eastern part of site allocation SR-0065 in the Council's Strategic Land Availability Assessment (SLAA). It should be noted that whilst we seek to promote our site in isolation, we have been in consultation with adjoining landowners and this letter should be read in conjunction with other submissions.

Housing Need There is an acknowledged high level of housing need in the District and the wider sub-region. This in part is a result of the location of the district on the edge of Greater London and within the commuter belt, the increased house prices within the more central London areas, and the context of an expanding population. The Council has identified a need to accommodate 11,400 new homes over the Local Plan period (2011-2033) and in Waltham Abbey itself, the recognised need is for 800 homes. It is understood the Draft Local Plan has identified potential sites to meet the housing need in Waltham Abbey over the plan period, including two sizeable parcels of Green Belt to the north of the Town. However, it is our view that the Land to the South of Honey Lane is more preferable for housing development.

Site Suitability We believe there are a number of compelling planning opportunities to support the promotion of the Land to the South of Honey Lane site for housing development. We expand on our reasoning below: Green Belt The proposed development site is currently identified as falling within the Green Belt, however the Council's 2016 Green Belt Assessment: Stage 2 (site reference 060.1) recognises the relatively poor performance of the land against the Green Belt Assessment Criteria, as shown in Table 1 below. The Draft Local Plan indicates the Council's view that this land may be more appropriately designated as District Open Land. Given that the existing site is not accessible to the public, is largely scrub land and is bound by the M25, however, we do not believe District Open Land to be an appropriate designation for the land.

Table 1: Extract from Epping Forest District Green Belt Assessment: Stage 2 (August 2016) - 060.1 Green Belt Assessment Criteria Contribution

Unrestricted sprawl of large built up areas	Relatively Weak
Prevent neighbouring towns from merging	Weak
Assist in safeguarding the countryside from encroachment	Moderate
Preserve the setting and special character of historic towns	Relatively Weak
Community Facilities	The proposed development site is of a scale where it could deliver a number of benefits for Waltham Abbey and the local

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community. Development of this site could provide an opportunity to deliver new community facilities and infrastructure, open space and recreation/sports facilities alongside residential dwellings. Furthermore, three sites currently allocated for residential development within the Draft Local Plan are existing community facilities (SR-0541, SR-0903, SR-0219). Given the scale of our proposed site and adjacent available land, development of this site would alleviate the pressure to develop sites currently in community use.

Sustainable Location The site's northern boundary abuts Waltham Abbey and it is bound by the A121 and M25. The site's location on the edge of the existing settlement would provide a sustainable location for further residential development. It is well placed to access existing services and facilities within the area, allowing future residents of the site the opportunity to use the existing local services and facilities within the town centre and utilise public transport nodes.

Flood Risk According to the Environment Agency's Flood Map, the site is understood to fall within Flood Zone 1 (low risk). The site is therefore considered sequentially preferable for residential development.

Public Access/ Open Space There is currently no public access across the site. A comprehensive redevelopment proposal would provide the opportunity to open up the site to the public, improving the quality of open space.

Biodiversity The land is low quality and currently let for grazing. It is understood that there are protected trees on or adjacent to the site. Sensitive development of this site could preserve the existing trees and provide further biodiversity benefits, for example through providing a vegetation buffer between the site and the M25.

Site Selection Report It is understood that the Council has recently been through a thorough site selection process in order to identify suitable sites for residential development. It is our view, however, that our site would be more appropriate for residential development in Waltham Abbey compared to the existing allocated sites. The two largest site allocations SR-0099 and SR-0104 are located in Green Belt to the north of Waltham Abbey. As there is no defensible boundary here, we believe the development of these sites would result in encroachment onto further Green Belt and open land. The land at Honey Lane is bound by the M25 and therefore development in this location would not pose the same risk. The Site Selection Report identifies the need for upgrade to the existing access at the SR-0099 and SR-0104 sites, should residential development occur. Such an upgrade would be costly and potentially disruptive to the existing highways network. The land at Honey Lane would not require access improvements due to its accessible location and the existing infrastructure. Furthermore, it is our view that further development to the north of Waltham Abbey could have significant adverse effects on congestion in the Town Centre and along Parklands. The proposed development site offers alternative routes into and out of Waltham Abbey. This would alleviate potential pressures on the highway network.

Alternative Development Options Whilst development of the land at Honey Lane for housing would provide an excellent opportunity to assist with the much needed delivery of homes in the District, we also promote consideration of the site for non-residential development. The proximity of the M25 and Waltham Abbey makes the site an attractive and feasible location for a range of business types. We believe that, subject to community and market requirements, promotion of the land at Honey Lane for a mix of residential, commercial and community uses should also be considered.

Conclusions We are of the view that the Local Plan consultation period represents an opportunity to remove the site from the Green Belt and for inclusion within Waltham Abbey's curtilage, enabling it to come forward for development. We welcome the positive conclusions set out in the SLAA, acknowledging the Honey Lane site's appropriateness for development and would like to further reiterate the following planning opportunities presented by the site:

- There is an acknowledged high level of housing need in the District and the Council are looking to provide 800 homes in Waltham Abbey over the period 2011-2033;
- The Epping Forest District Green Belt Assessment (LUC, 2016) recognises the site's relatively poor performance against the Green Belt Assessment Criteria;
- The site is located on the edge of Waltham Abbey and therefore development would accord with sustainable development principles;
- The scale of the site is such that there is scope to incorporate much needed community facilities into development plans;
- The site is well connected to both the Town Centre and the M25 and as a consequence, housing development in this location would not cause further pressure on the local transport network. Which would likely be the case with the sites to the north of the Waltham Abbey;
- Subject to community and market need, the scale of the site and its location would also make it attractive and feasible for commercial development.

We wish to reiterate that the land owned by our client is immediately available for redevelopment. Whilst we accept in principle the site coming forward alongside the adjacent land to its west (the 'original' SR-0065), we do not consider that redevelopment of the land should be predicated on the remainder of the area coming forward. Based on the recommendations set out in Draft Local Plan Policy SP4, for densities of between 30 and 50 dwellings per hectare, it is our view that this site should be promoted for between 390 and 650 homes. Provided any such redevelopment is not prejudicial, then we see no reason why the land in our client's ownership could not come forward once the Plan is adopted, with remaining land coming forward in later phases. We look forward to receiving your acknowledgement that these comments have been received

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and are being taken into consideration. Should you have any queries or wish to discuss please do not hesitate to contact **REDACTED** of these offices.