

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

Stakeholder ID	3466	Name	Kevin Coleman	Phase 2 Planning on behalf of Mr & Mrs Barr
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Date	6/12/2016
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### Letter or Email Response:

Epping Forest District Draft Local Plan Consultation 2016 These representations to the Draft Local Plan are submitted on behalf of our clients, Mr and Mrs Barr, who are the owners of proposed residential/traveller allocation site SR-0099/GRT\_N\_07 (Lea Valley Nursery. Crooked Mile) and site SR-0375 (Galley Hill Yard Industrial Estate) which is proposed as a commercial site for intensification. In accordance with previous representations to the Local Plan/Call for Sites submissions, we continue to support the proposed allocations for these three sites, and remain committed to their effective delivery in accordance with the provisions of the emerging Local Plan. In addition to our support for allocations SR-0099, GRT\_N\_07 and SR-0375, we offer the following additional comments:

- We support the option of settlement expansion to the north, and in particular to the immediate north of Parklands, where development would be: (i) well related to the existing urban form of Waltham Abbey; (ii) where opportunities best exist to integrate development with existing services and infrastructure; (iii) where there is the ability to make use of land in the Green Belt that contains previously developed land (site SR-0099 in particular); (iv) where expansion would have minimal impact on the purposes of the Green Belt, having regard to land form and existing commercial uses, and (v) where new development is well related to the existing town centre, and is accessible by non-car modes.
- We support the Site Deliverability Assessment for site SR-0099 prepared by Arup, but would wish to point out the following matters: (i) Criterion 2.4b suggests the site is situated more than 1km from a primary school, but our calculations suggest that the centre of site SR-0099 is only 500m from the centre of the Waltham Holy Cross Infants and Junior School, and only 1km walking distance from the centre of the site to the school boundary. Certainly a significant proportion of the site is within 1km of these schools; (ii) Criterion 2.5b suggests the site is situated more than 1km from a secondary school. Again however, our calculation is that the centre of the site is within 1km walking distance from the King Harold Academy (via Parklands and the pedestrian footway that links Parklands to Broomstick Hall Road in the vicinity of Hewins Close). Certainly a significant proportion of the site is within 1km of this secondary school; (iii) Criterion 2.7 notes that site is more than 1km from a Doctor's surgery - whilst the centre of the site is just over 1km to the Market Square and Keyheath Medical Centres, the southern parts of the site are within 1km of these surgeries, and therefore it is the case that the site is partially within 1km of a health facility, which we feel should be recognised in the Qualitative Assessment column of the appraisal; (iv) The assessment notes that the cumulative impact of the Waltham Abbey residential allocations would lead to a reduction in existing open space. Site SR-0099 does not contain any public open space and therefore the development of this site cannot impact on existing open space. We assume the appraisal is suggesting a relative decrease in open space as a result of population increase, rather than an absolute loss of open

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space. In any event, the proposed allocations have the ability to deliver new publically accessible open space as part of the site proposals, and therefore even on the basis of relative impact there need be no loss of publically open space. Indeed, we would expect the reverse to be the case, because if each development allocation meets its own open space requirements, then there would be likely to be a small relative increase in overall accessibility to public open space. • We confirm that site SR-0099 continues to be subject to significant interest from the development industry, including from many of the national housebuilders, and if necessary evidence to that effect can be provided. • In respect of proposed allocation GRT\_N\_07 (5 pitches), we have no objection to the inclusion of this level of provision within the wider allocation of site SR-0099, as per our previous correspondence on this matter. Figure 5.9 suggests the location for these pitches would be on the northern side of the site to the rear of Crooked Mile, and the supporting text to the Plan refers to this facility being 'illustrated' on Figure 5.9. This suggests that there may be flexibility as to the exact siting of the facility within the overall allocation, and we would support such flexibility being maintained at Submission stage, to enable future Masterplanning to consider the most appropriate siting for this use within the overall development scheme. • We support the concept of the Local Plan identifying existing employment sites for intensification - the District contains a number of existing employment sites which offer the potential to deliver additional jobs through making either localised expansion or making best use of the existing available land for employment purposes. In particular, we support the allocation of Galley Hill industrial site (SR-0375) for such purposes as shown on Figure 5.9, as this is a very successful existing commercial location with potential for further job creation and business activity. We would suggest that the most effective treatment would be the removal of the site from the Green Belt to support commercial intensification, but we do not object to a policy based approach to employment intensification of the land whilst it remains in the Green Belt. We trust the above comments will be taken in to account as the draft Local Plan is progressed. The access down Lower Bury Lane is narrow and busy with school traffic and a long walk-distance from the Tube station leading to increased car journeys, congestion and parking demand.

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