

Stakeholder Reference:
Document Reference:

Part A

Making representation as Landowner

| Personal Details | | Agent's Details (if applicable) |
|-------------------------------|--------------------|---------------------------------|
| Title | Mr | |
| First Name | Luke | |
| Last Name | Hibberd | |
| Job Title (where relevant) |Redacted..... | |
| Organisation (where relevant) |Redacted..... | |
| Address |Redacted..... | , |
| Post Code |Redacted..... | |
| Telephone Number |Redacted..... | |
| E-mail Address |Redacted..... | |

Part B

REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?

Paragraph:

Policy:

Policies Map:

Site Reference: WAL.R1

Settlement: Waltham Abbey

Do you consider this part of the Pre Submission Local Plan to be:

Legally compliant: Yes

Sound: Don't Know

If no, then which of the soundness test(s) does it fail?

Complies with the duty to co-operate? Yes

Please give details either of why you consider the Submission Version of the Local Plan is not legally compliant, is unsound or fails to comply with the duty to co-operate; or of why the Submission Version of the Local Plan is legally compliant, is sound or complies with the duty to co-operate. Please be as precise as possible. Please use this box to set out your comments.

With reference to Map 5.6 Abbey View Produce can be seen the land between WAL.R1 WAL.R3 and WAL.E6. The locating of the master-plan on this site land-locks Abbey View Nurseries from future, development and/or expansion on site and inhibits the feasibility and sustainability of the longstanding family business.

As laid out in policy E3 the horticulture glasshouse industry is a progressive industry where continued improvement is required for long term sustainability. Abbey View Produce have repeatedly attempted to purchase neighbouring sites which are currently E13 designated only to be rebuffed due to the 'hope value' of housing whilst the land owners of the area awaited the submission of the local plan. The plans for Abbey View produce were to steadily expand and purchase sites stretching from WAL.E6 to WAL.R2 giving circa 100 acres of glasshouse production on one site providing import replacement food and helping reduce the national food deficit. The site was intended to also provide the opportunity for collaboration with research bodies and other associated business's to provide a world leading centre for glasshouse production.

In addition to the lack of future expansion there is a concern of increased anti-social behaviour which already effects the site increasing due to the new proximity of population centre. The current anti-social behaviour is mainly concentrated to glass panel breakages in the greenhouse(s) by local youths. In addition to the primary cost of replacement the resultant costs mount in relation to damaged environment resulting in loss of yield, loss of fruit due to food safety concerns of glass contamination, lost productivity due to H&S concerns.

Given the importance to the local plan of the Waltham Abbey North Master-plan and the unlikeliness of this to change, Abbey View feel the best way forward for all parties is for Abbey View to relocate to another more suitable site with the desired capacity for our future projects ideally within the district. As such Abbey View would look for our current site to be removed from its current greenbelt designation to enable maximum funds to be raised through the site sale for housing development to fund the relocation and expansion.

Abbey View are currently an employer of 150 staff directly with a further 200 jobs reliant on the role Abbey View play within the industry, should the full expansion plans be achieved this would be supplemented with an additional 150 jobs. Further green energy production and increased local and national food security.

Abbey View's stance on the subject has not changed from our previous submission to the draft local plan in 2016

Please set out what change(s) you consider necessary to make the Pre Submission Local Plan legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

Yes, I wish to participate at the oral part of the oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

AS members of Epping Forest's food task force for the past three years we would like the opportunity to expand on our representations above.

REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?

Paragraph:

Policy:

Policies Map: Yes

Site Reference: None of the above

Settlement: Waltham Abbey

Do you consider this part of the Pre Submission Local Plan to be:

Legally compliant: Yes

Sound: Don't Know

If no, then which of the soundness test(s) does it fail?

Complies with the duty to co-operate? Yes

Please give details either of why you consider the Submission Version of the Local Plan is not legally compliant, is unsound or fails to comply with the duty to co-operate; or of why the Submission Version of the Local Plan is legally compliant, is sound or complies with the duty to co-operate. Please be as precise as possible. Please use this box to set out your comments.

Whilst it is both recognised and supported that policy E 3 Food Production and Glasshouses is written with the positive intentions towards the industry and supports Policy SP 2 (F iii). The wording of the policy broadly supports its aim although in our opinion requires some slight amendments;

The policy fails to address the largest barrier to growth in the industry which is the high value of land for housing. Whilst the criteria approach and classification of horticulture as agriculture and therefore suitable for development in greenbelt appears to widen the number of locations suitable for greenhouse development (in comparison to current adopted policy including E13 designated sites). The criteria risks pushing the industry away from population centres and therefore its employees creating the need for further onsite housing and provides extra constraints on the industry in comparison to national policy.

Abbey View feel the strongest approach to achieve the aims set out by the Lea Valley Food Task Force (3.62) would be a hybrid designated area approach supported by criteria based policy (in line with national policy) to identify new sites suitable for designation

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If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

As members of the Epping Forest food task force for the past three years we would like to be given the opportunity to expand on our representations above.

Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination

Yes

Signature: Luke Hibberd Date: 29/01/2018