

23 April 2018



Planning Policy Team
Epping Forest District Council
Civic Offices
323 High Street
Epping
Essex CM16 4BZ

Ben Thomas
E: bthomas@savills.com
DL: +44 (0) 203 320 8262

33 Margaret Street
London W1G 0JD
T: +44 (0) 20 7499 8644
savills.com

Epping Forest District Council Submission Version Local Plan Site Selection Evidence Base

We write on behalf of Crest Nicholson in relation to the site known as the former Pickfield Nursery at Pick Hill, Waltham Abbey (SLAA Reference SR-0161).

This should be read in conjunction with our Regulation 19 representations and its appendices submitted in January 2018 which include a Design Development Framework document and photos of the dilapidated site. Pickfield Nursery was submitted to EFDC in response to the Call for Sites consultation in 2008 and has subsequently been promoted through the current Local Plan process since its inception in 2012. The first assessment of the site has now been published, and simply states:

This site did not proceed for further testing at Stage 3 as it is ranked lower in the land preference hierarchy which, based on the Council's Local Plan Strategy, as set out in the Site Selection Methodology, states the order in which sites should be identified for allocation. The site was less preferable because it included land located within Flood Risk Zones 2, 3a and 3b and there are a sufficient number of sites within the settlement that are ranked more favourably.

While additional information was submitted by the site promoter in relation to this site in response to the Draft Local Plan (2016) consultation around flood defence work undertaken, which may reduce the extent of land subject to higher flood risk zones, the site selection assessment has drawn on the most up-to-date flood risk mapping produced and verified by the Environment Agency.

The suitability of the site was considered at Stage 6.3 in 2017 since it was identified as potentially being able to contribute to the Council's five year housing land supply. This site scored poorly against several criteria in addition to flood risk including Green Belt harm, landscape sensitivity, BAP Priority Habitats and Local Wildlife sites. Although the site could contribute to the five year housing land supply, it was considered that this benefit did not override the constraints identified, including around flood risk, and therefore the site did not proceed any further.

We respond to EFDC's three main reasons for omitting the site, as underlined (our emphasis) above:

Flood Risk

Crest has worked closely with the EA to remodel Cobbins Brook's flood risk zone and their 2017 response states:

"The results of the remodelling with the updated climate change allowances show the flood risk on the site is shown to be relatively low. Only areas directly adjacent to the river are affected by the 1 in 100 year plus 35% climate change allowance and the 1 in 100 plus 70% climate change allowance flood extents. We are pleased



that you have stated that you will try to locate all built development outside of the 1 in 100 plus 35% flood extent."

The letter from the EA and corresponding plan is again enclosed for ease of reference (see **Enclosure 1**). It is clear that a very small percentage (under 10%) of the site is impacted by flood risk. This is also reflected in the EA's most up-to-date information.

Green Belt / landscape

Landscape / Green Belt impact EFDC's Sustainability Appraisal (December 2017) indicates that the northern expansion of Waltham Abbey is preferable but that *"Part of this strategic option is sensitive to change in landscape terms, as evidenced by the Settlement Edge Landscape Sensitivity Study (2010), which concluded that the landscape to the north-east of Waltham Abbey is highly sensitive to change"*.

However, this 2010 Study assesses a significantly greater parcel than Pickfield Nursery and precedes the Knollys Nursery application which has since been consented within this "sensitive landscape" to the north-east of Waltham Abbey.

In relation to Pickfield Nursery, EFDC's Development Control and Landscape officers have assessed the site through the formal pre-app process stating *"The horticulture use has ceased (1987) leaving the site in a poor state of disrepair that is extensively covered with broken glass and rubble. The information was referred to the Council's trees and landscape officer. It was stated that the site had very little vegetation within its boundaries that is worthy of protection and that the site appears well located within the landscape so as not to be excessively visually intrusive. In principle therefore on landscape grounds there were no objections to the proposal. The buffer zone required by the Environment Agency which requires the development to be setback from the brook, would allow for the opportunity to provide a large area of landscaping in addition to the soft landscaping throughout the site. It is acknowledged that the visual impact of the development would likely be significantly less than on the adjacent Knollys site and that there are potentially significant environmental and social benefits from the scheme which need to be fully explored."*

The former Pickfield Nursery represents a logical extension to an established residential area and benefits from permanent boundaries on all sides including Cobbins Brook to the north. The site is an eyesore and offers no value to the local environment or the purposes of the Green Belt.

Ecology

Survey work undertaken in liaison with Natural England confirms that the majority of the site is of low biodiversity value given its poor condition and the high level of hardstanding present. There are significant environmental and ecological net benefits associated with redeveloping the dilapidated site including the cleaning of Cobbin's Brook and the provision of a unique wildlife corridor.

Conclusion: Local Plan amendments being sought

The former Pickfield Nursery represents a unique opportunity to deliver significant environmental, economic and social benefits at a well contained, sustainably located site covered in hardstanding, broken glass and rubble following 30 years of dereliction.

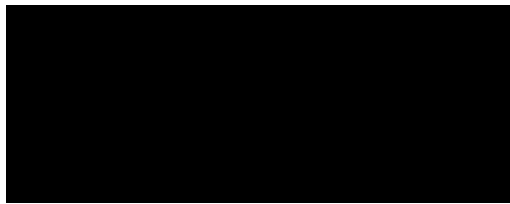
Despite Crest Nicholson's promotion of the site through the Local Plan process since its inception in 2012, EFDC's long awaited three-paragraph assessment of the site is contrary to the advice from statutory consultees and their own Development Control and Landscape officers.

There are not considered to be any sound grounds for the site's omission from allocation in the Local Plan. Crest Nicholson's proposals are supported by statutory consultees and local stakeholders including the adjacent Care Home, and have been informed by positive pre-application advice.

Therefore, in order to make the Local Plan Sound, the following amendments are considered necessary:

- The identification of Pickfield Nursery as residential allocation WAL.R9 for approximately 90 homes under "Policy P 3 Waltham Abbey" (short term delivery within first five years of Plan period).
- The identification of consented site Knollys Nursery as allocation WAL.R8 which the Local Plan currently ignores.
- Amendment to "Map 5.6" to reflect the above, as shown at Appendix 3 of our Regulation 19 representations.

Yours sincerely



Ben Thomas
Associate Director

CC Mark Bedding – Crest Nicholson

Enclosure 1 Flood Modelling EA confirmation

James Dyason
Ardent Consulting Engineers
1-2 Crescent Court
High Street
Billericay
Essex
CM12 9AQ

Our ref: NE/2016/126167/01-L01
Your ref: HTSNLN00130
Date: 6 January 2017

Dear James

Former Pickfield Nursery Site, Waltham Abbey.

Charged model review incorporating climate change allowances for a proposed residential development.

Thank you for sending us the model report for the above site. We have now reviewed this as part of your charged agreement with us.

Based on *Hydraulic Modelling Note Q522-01 - Pickfield Nursery (December 2016)*, we find that the re-run model is fit for purpose and it would be suitable to use to inform a Flood Risk Assessment (FRA) to accompany a planning application for a development at this site.

As discussed previously, we have applied a risk based approach to the assessment of this model. In this instance a basic review has been carried out. We have not undertaken a full assessment of the fitness for purpose of the modelling and can accept no liability for any errors or inadequacies in the model.

You have taken the existing EA River Lee 2D Flood Mapping Study (Model Name M09) and rerun this with the updated climate change allowances. The updated modelling is based on the existing hydrology and hydraulic model of the Cobbins Brook.

The results of the remodelling with the updated climate change allowances show the flood risk on the site is shown to be relatively low. Only areas directly adjacent to the river are affected by the 1 in 100 year plus 35% climate change allowance and the 1 in 100 plus 70% climate change allowance flood extents.

We are pleased that you have stated that you will try to locate all built development outside of the 1 in 100 plus 35% flood extent. We hope this will be the case. If this is not possible, the FRA would need to address floodplain compensation and finished floor levels.

If you have any queries about this response, please do not hesitate to contact me.

Yours sincerely

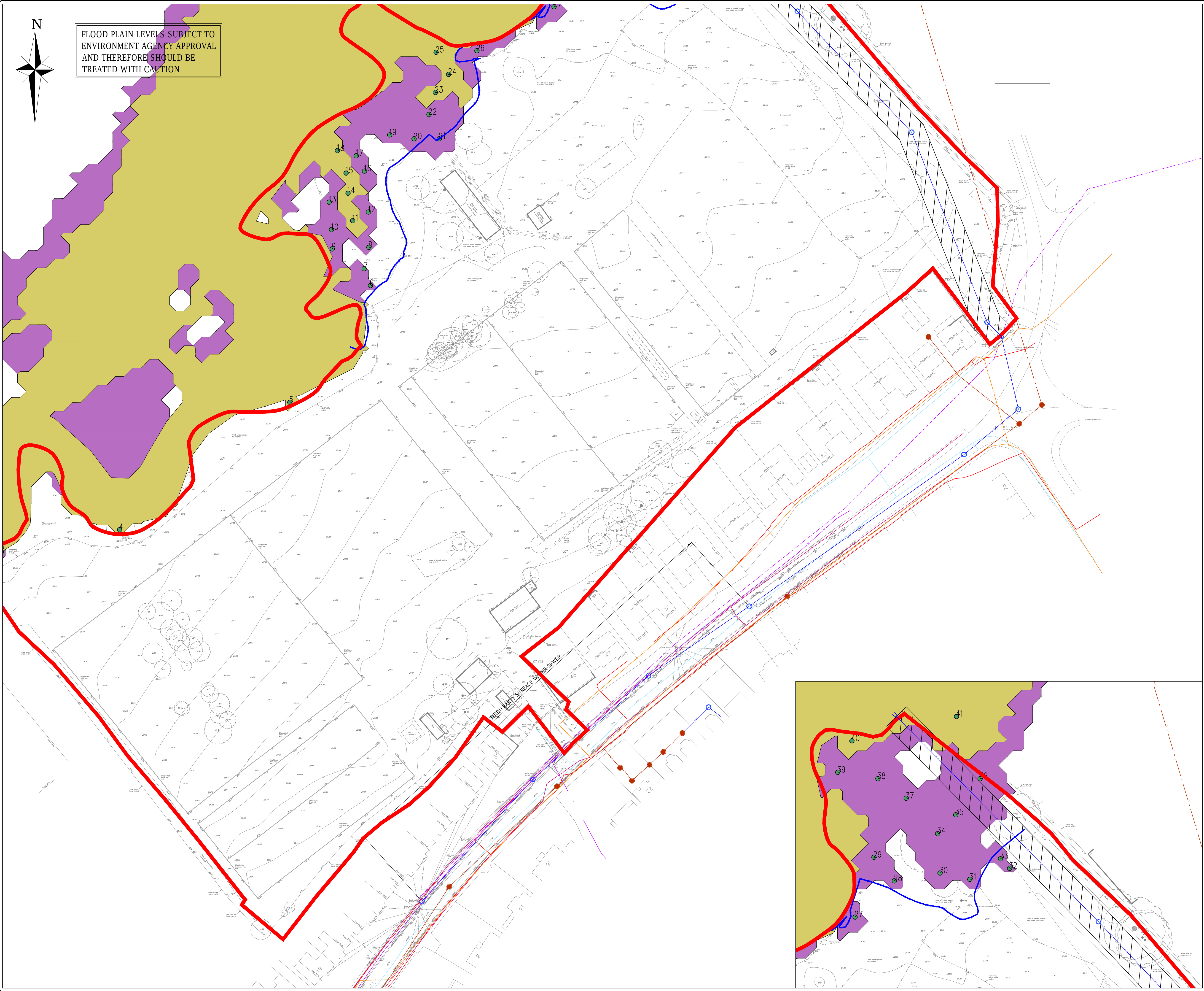
Environment Agency
Apollo Court, 2 Bishops Sq Business park, Hatfield, Herts, AL10 9EX.



Thomas Campbell
Sustainable Places Planning Advisor

Direct dial: 0208 474 7633

E-mail: HNL SustainablePlaces@environment-agency.gov.uk



- NOTES:
1. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH THE RELEVANT SPECIFICATION AND ALL OTHER RELATED DRAWINGS ISSUED BY THE ENGINEER.
 2. DO NOT SCALE FROM THIS DRAWING. WORK FROM FIGURED DIMENSIONS ONLY.
 3. ALL DIMENSIONS SHOWN ON THIS DRAWING ARE IN MILLIMETRES UNLESS OTHERWISE STATED.
 4. ALL DIMENSIONS, LEVELS AND SURVEY GRID CO-ORDINATES ARE TO BE CHECKED ON SITE AND THE ENGINEER NOTIFIED IMMEDIATELY OF ANY DISCREPANCIES PRIOR TO THE COMMENCEMENT OF THE WORKS.
 5. NO DEVIATION FROM THE DETAILS SHOWN ON THIS DRAWING IS PERMITTED WITHOUT PRIOR PERMISSION FROM THE ENGINEER.
 6. SERVICES LOCATIONS ARE INDICATIVE AT THIS STAGE AND WHERE APPROPRIATE WILL REQUIRE FURTHER CONFIRMATION OF POSITION DURING THE LATER STAGES OF DESIGN.

- LEGEND:
- NATIONAL GRID LOW PRESSURE GAS MAIN
 - UKPN LOW VOLTAGE CABLE
 - THAMES WATER SURFACE WATER SEWER AND MANHOLE. PREDICTED EASEMENT SHOWN WHERE APPROPRIATE
 - THAMES WATER FOUL WATER SEWER AND MANHOLE
 - THAMES WATER RISING MAIN
 - THAMES WATER DISTRIBUTION MAIN
 - VIRGIN MEDIA UNDERGROUND TELECOMS
 - BT UNDERGROUND TELECOMS CABLE
 - BT OVERHEAD TELECOMS CABLE
 - UPDATED 1 in 100 year + 35% CC Flood Outline
 - UPDATED 1 in 100 year + 70 CC Flood Outline
 - RED LINE BOUNDARY
 - EA MODEL NODE REFERENCE
 - PREVIOUS 1 in 100 year + 20% ALLOWANCE FOR CLIMATE CHANGE FLUVIAL FLOOD OUTLINE
 - APPROXIMATE EXTENT OF THAMES WATER UTILITIES SEWER EASEMENT

DRAFT FOR
INFORMATION ONLY

REV	AMENDMENTS	DES	CHK	APP	DATE
-----	------------	-----	-----	-----	------

ARDENT CONSULTING ENGINEERS



Suite 207
One Aile Street
London
E1 8DE
Tel: 020 7680 4088
Fax: 020 7488 3736
Web: www.ardent-ce.co.uk
E-mail: enquiries@ardent-ce.co.uk



CLIENT:		CREST NICHOLSON	
PROJECT TITLE:		PICKFIELD NURSERY WALTHAM ABBEY	
DRAWING TITLE:		WORKING DRAFT CONSTRAINTS PLAN	
SCALE:	DATE:	DESIGNED:	
1:500 @ A1	JULY 2016		OF
DRAWN:	CHECKED:	APPROVED:	
OF	JWD		-
DRAWING NO.		Q520-011	REV: -