

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

Stakeholder ID	3387	Name	Nicola	Blanks	Bidwells on behalf of Land south of Waltham Abbey and in respect of Quinton Hill Estate
Method	Email				
Date	19/1/2017				

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### Letter or Email Response:

1.0 Green Belt The published proposals/inset plan for Waltham Abbey (figure 5.9) is objected to. It is inconsistent with the intention of the Green Belt as set out in draft Policy SP5 and its cross reference to the preceding figure 3.8. The second stage review for the Green Belt plus figure 3.8 offers support for the removal of the Green Belt south of the M25, east of Sewardstone Road and with the Green Belt boundary aligning with Dowding Way up to junction 26 of the M25. This Green Belt expectation was largely confirmed in the more detailed proposals/inset plan for Waltham Abbey (Figure 5.9) which accompanied the content of the draft Local Plan as presented to, and approved by Cabinet on the 6 October. I attach a copy of that plan in Appendix 1. Following enquiries to the District Council it has been explained that the Waltham Abbey plan which accompanied the Cabinet report was "in error". A copy of the e-mail which provides that explanation is attached (see Appendix 2). However, that explanation is not endorsed by any formal minutes to the Cabinet, which carries the unaltered figure 5.9. By the subsequent, post- Cabinet change to the Waltham Abbey plan, Policy SP5 and figures 3.8/5.9 are inconsistent with each other and where the change is not justified by the Green Belt technical review. It is therefore submitted that the land between Dowding Way and the M25 (east of Sewardstone Road and west from Junction 26 of the M25) should be removed from the Green Belt and this be illustrated by amendments to figure 5.9. Exceptional circumstances rest with the need to allocate land for both housing and commercial/retail purposes and in circumstances where the Council's own studies confirm the land is weak to moderate in meeting the essential purposes of the Green Belt. It is also noted that the Green Belt technical studies have acknowledged the far eastern edge of the land north of Dowding Way and immediately up against the Junction 26 of the M25 is worthy of Green Belt release. This area (see Appendix 3) is a despoiled area formerly used for storage and vehicles associated with lane improvements to the M25. Suggested modification to Green Belt Policies 1.1 Figure 5.9 requires modification to be consistent with Fig 3.8 and the corresponding figure for Waltham Abbey as applied to the Cabinet report (6 October 2016) adapted to show no Green Belt designation for land between Dowding Way (west of Sewardstone Road) up to Junction 26 of the M25 (see plan in Appendix 4 to these representations).

2.0 Housing Objection is raised by the failure of the emerging Local Plan to fairly consider the housing potential within the area enclosed between Dowding Way and the M25, east of Sewardstone Road to Junction 26 of the M25. That potential has

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previously been illustrated and explained in a feasibility report submitted to the District Council in 2013 (see attached in Appendix 5). Page 1 In assessing the site for Epping Forest District Council, there has been a failure by the contracted firm (Arup) to appreciate, in a reasonably fine grained approach the environmental capacity and therefore the true development opportunity available. Had they done so, they would have appreciated how 1.3 Ha of Trinity Hall land is available to the immediate east of Sewardstone Road (and on previously developed land - see Appendix 4) plus 3.7 Ha of Trinity Hall land restricted to the immediately adjoining field (see Appendix 5). To highlight the potential from previously developed land, I attach in Appendix 4 the pre-application submission made to the District Council earlier this year. As the Quinton Hill site assessment from the retained EFDC consultants was based only on a broad swathe of land (i.e. not the discrete parcels of land previously promoted by Trinity Hall for housing in their earlier representations) Arup have distorted the environmental credentials and the true potential for sustainably located new housing. There appears a failure in communication by Epping Forest District Council to relay earlier representations made on behalf of Trinity Hall that would have assisted the approach taken by Arup. Indeed, earlier studies by NLP looking at residential capacities recognised a residential potential but their findings are seemingly disregarded by Arup. As such the plan is at risk of being unsound as it is not justified by consistent and justified evidence gathering. Suggested modifications to Housing Policies 2.1 Policy SP2 to include up to 200 homes east of Sewardstone Road and additional to the 800 identified for Waltham Abbey. 2.2 Policy P3 to include land as identified in areas I and J in Appendix 1 to this submission and for up to 200 new homes. 2.3 Policy P3 to differentiate between the two distinct housing areas identified in 2 above in the following manner; Land occupying former farm house and outbuildings 1.37 Ha up to 40 homes Land west of former farm house and outbuildings 3.71Ha up to 160 homes 3.0 Employment The plan as currently composed offers a two staged approach to employment allocation. It offers illustrations of potential sites but without commitment to their allocation. Part F of Policy E1 refers to EFDC undertaking further work "to enable specific employment requirements and allocations to be identified". This aspect is similarly explained in the aforesaid e-mail referred to above and attached in Appendix 2. It is unclear why the evaluation of commercial sites cannot take place alongside the evaluation of housing sites particularly as that more comprehensive approach will then allow a holistic approach to the revision of Green Belt boundaries. If, as the e-mailed information (Appendix 2) provides, the evaluation of commercial sites are to follow after the conclusion of the current consultation period, then it leads to the logical conclusion that the environmental assessment of chosen housing requires a further re-evaluation so that the cumulative impact of housing and commercial sites in combination can be tested and alternatives fairly considered. Page 2 Suggested modification to Employment Policies 3.1 Policy E1 be modified to offer more certain employment allocation and include land north of Dowding Way for employment uses 3.2 Fig 5.9 to offer a confirmed allocation for the area referenced as SR-0061B 3.3 Fig 5.9 to offer an allocation for roadside service potential for land immediately west of Junction 26 and north of Dowding Way (see Appendix 3). \*See Appendix 1 - 5\*

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