

Our ref: TR/Q080318
Your ref:
Email: [REDACTED]
Date: 9th December 2022



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

By Email

Dear Sir Madam,

Main Modifications to Epping Forest District Local Plan Submission Version 2017 for the further Main Modifications Consultation October 2022 Representations on behalf of Next Plc

We are instructed by our client, Next Plc (Next), to submit the enclosed representations to the consultation on the Main Modifications (MMs) to the Epping Forest District Council Local Plan. Next are a key stakeholder in the District, with aspirations to redevelop the land north of Dowding Way, Waltham Abbey, Essex ('the Site'). A plan indicating the extend of Next's ownership appears as **Document 1**.

The Site is within the boundary of Epping Forest District Council (EFDC) and has significant redevelopment potential. This is demonstrated by its continued emerging allocation for employment uses (site ref. WAL.E8) and its proposed removal from the Green Belt.

Next has ambitions to bring the Site forward for employment uses, as demonstrated through the site's planning history. It is important that there is a policy framework in place to ensure that future development of the Site (as recognised by EFDC) is delivered and the maximum benefits associated with the future development are realised.

The documents which form the EFDC Local Plan Review, and which are the subject of the current consultation, are:

- **Draft Local Plan Submission Version (LPSV); and**
- **Schedule of Main Modifications Consultation October 2022.**

Representations can be made up until 5pm on Friday 9th December 2022; on the basis that this letter has been submitted within those timescales, we trust that our comments will be taken into account.

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1 WAL.E8 Support

The Site forming part of the WAL.E8 employment allocation is proposed for removal from the Green Belt and proposed to be allocated for E(g)(iii)/B2/B8 (light industrial / general industrial / warehousing and distribution) uses under 'emerging' Policy P3 (Waltham Abbey). Next fully supports the continued allocation of the site through the Local Plan, and it remains Next's intention to deliver high-quality employment floorspace on the Site.

2 Main Modifications Consultation October 2022

Policy DM 22 (Air Quality)

Main Modification 75

The Main Modifications propose the following wording to Part A of Policy DM 22:

"A. [...] ensure neither future, nor existing residents, workers, visitors, or environmental and other sensitive receptors are adversely impacted as a result of the development."

The proposed wording does not provide a clear differentiation between types of sensitive receptors, and is therefore too broad and open to interpretation. Specifically, inclusion of "environmental receptors" and "other receptors" does not define the types of receptors (i.e. visual or acoustic) and could cover to wide a range.

To ensure that the policy is not misinterpreted at planning application stage, the wording should be tightened to make it clear that "ecological receptors" for example should not be included, given that matters affecting the District's ecology are provided by other policies including Policy DM 1 (Habitat protection and improving biodiversity), Policy DM 2 (Epping Forest SAC and the Lee Valley SPA) and Policy SP 7 (The Natural Environment, Landscape Character and Green and Blue Infrastructure).

Having regard to the above, the following additional wording is proposed (as underlined):

"A. [...] ensure neither future, nor existing residents, workers, visitors, or environmental and other sensitive receptors (excluding ecological receptors) are adversely impacted as a result of the development."

It is considered that the revised wording is necessary to make it explicit that "environmental" or "other" sensitive receptors do not include ecological receptors which are dealt with in other policies of the Plan.

3 Summary

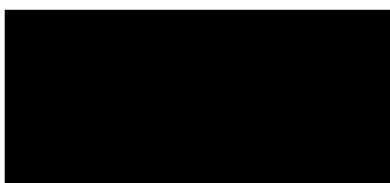
Next plc continue to support the allocation of WAL.E8 and its removal from the Green Belt.



Next plc has very limited comments on the MMs consultation beyond clarification within the wording of Policy DM22 that “sensitive receptors” are not ecological receptors, given these are addressed in other policies in the Plan.

We trust that these representations will be given consideration by the Council and are helpful in progressing the Local Plan. In the meantime, please do not hesitate to contact us if there any queries.

Yours faithfully,



Tim Rainbird
Senior Director

Encl.