

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

Stakeholder ID	3987	Name	Lee Stannard
			J B Planning Associates Ltd on behalf of GE Bridger Ltd

Method	Letter
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Date	12/12/2016
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Letter or Email Response:

1. These representations are made on behalf of GE Bridger Ltd, who are the landowners **REDACTED**. A site location plan is enclosed as Appendix 1. These representations relate to the Regulation 18 Consultation on the Epping Forest District Draft Local Plan 2016. 2. The land at **REDACTED** represents a previously developed site in the Green Belt. The easternmost part of the site is currently undeveloped, with the westernmost part of the site in use for storage and for parking lorries. A copy of the VOSA site operations licence is enclosed as Appendix 2, which allows for the operation of 9 lorries from the site. There is also an existing dwelling house on the site. The site is not currently identified as an allocation in the Draft Local Plan and is located within the Upshire Conservation Area. 3. GE Bridger Ltd are keen to promote this site for residential redevelopment. As set out further in this representation, we believe that this site should be allocated in the Draft Local Plan, principally due to its sustainability credentials, and ability to help the Council further meet their strategic objectives. The site is located close to Waltham Abbey and the residential redevelopment of the site would introduce a more sympathetic use to this primarily residential area and the Upshire Conservation Area, compared to the existing HGV operations use. 4. Also submitted alongside these representations is a completed Call-for-Sites Form. A proposed site plan for the site is located at Appendix 3. We believe the site can suitably accommodate approximately 5 dwellings, located in the westernmost part of the site. Sustainable Development and Draft Policy SP1 - Presumption in Favour of Sustainable Development 5. This representation in principle supports the inclusion of Draft Policy SP1, which sets out that the Council will consider planning applications in line with the presumption in favour of sustainable development, as set out at Paragraph 14 of the National Planning Policy Framework (2012). 6. When considering the developable parts of the site, the site at the **REDACTED** should be considered favourably in line with the Council's methodology at Page 38. The Site at **REDACTED** would fall under category 4 (previously developed land within the Green Belt), whereas given the scale of development required in the District, a significant amount of land will need to be released which is currently Green Belt/Greenfield, which is classed under category 5 (Greenfield/Green Belt sites on the edge of settlements). The site at **REDACTED** therefore would score more highly when compared against other sites using the Council's own methodology. SP5 - Green Belt and District Open Land 7. This representation broadly supports the release of some land from the Green Belt for development purposes. However, it is asserted that when assessing the suitability of sites for residential development, the Council's own methodology should be applied. 8. The site at **REDACTED**, which is previously developed land in the Green Belt should therefore be allocated in preference to sites in the Green Belt which are currently undeveloped.

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Further, given the proximity of REDACTED to Waltham Abbey (one of the District's larger settlements), and its location in a mainly residential area, additional weight should be given in favour of allocating this site for residential redevelopment. 9. On behalf of the landowner we refer to Paragraphs 89/90 of the National Planning Policy Framework (2012), in order for the sites redevelopment to be viable, a sufficient quantum of additional development will be required. These paragraphs state respectively: "limited infilling or the complete and partial redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including within it than the existing development". "the re-use of buildings provided that the buildings are of permanent and substantial construction". 10. Significant benefits would arise from the redevelopment of this site, including the cessation of the existing storage and HGV operations use for 9 lorries, which is longstanding, may not be considered appropriate in this location which is predominantly residential and within the Upshire Conservation Area. 11. Further discussion with Officers as to the redevelopment of this site will be welcomed. Draft Policy DM21 - Local Environmental Impacts, Pollutions and Land Contamination 1 2. The wording of this policy is broadly supported, particularly with regard to land contamination. Given the current and historical uses of the site, the client has instructed WSP Parsons Brinckerhoff to conduct a Phase I Land Contamination Assessment. 13. The Phase I Assessment has identified a possible moderate risk to human health, low risk to controlled waters and low/medium risk from geotechnical concerns. WSP recommend that further surveys are undertaken to confirm the risk to the site, as well as an asbestos survey. 1 4. GE Bridger Ltd will be pleased to discuss with Officers at Epping Forest District Council the findings of WSP in due course. Proposed Amendments 15. Given the above, we believe that the site at REDACTED should be included as an allocation in the Draft Local Plan for 5 dwellings. 16. We look forward to further dialogue with Epping Forest District Council with regard to REDACTED over the next few months.