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Local Plan Regulation 19 Representation
Planning Policy Team
Epping Forest District Council
Civic Offices
323 High Street
Epping
Essex CM16 4BZ

29th January 2018

BY EMAIL

Dear Sir/Madam,

**LOCAL PLAN REGULATION 19 REPRESENTATION ON BEHALF OF ABBEY VIEW PRODUCE
ABBNEY VIEW PRODUCE, GALLEY HILL RD, WALTHAM ABBEY, EN9 2AG**

We are writing on behalf of our client Abbey View Produce, ("our client") in response to the Epping Forest Draft Local Plan Regulation 19 consultation. Our client owns land known as Abbey View Produce Ltd to the west of Galley Hill Road (Site Location Plan enclosed) and is promoting the site as a logical development opportunity for the Council to consider, having regard to the wider Waltham Abbey Masterplan proposals that wrap around the site to the north and west.

Abbey View Produce is a forward-thinking company which is supportive of the District Councils goals whilst being respectful of its past and the community it is within. In this context our client can confirm the potential of the site to assist the Council with accommodating the sustainable housing growth in the most suitable and deliverable locations. The merits of the site and ability to sensitively accommodate development are discussed further within these representations.

Our client therefore supports Policy P3 draft allocation that surrounds the site but wishes to make the following comments of the details to ensure the plan is found sound and legally compliant. These are:

National Planning Policy Framework (NPPF)

In order for the Local Plan to comply with the NPPF, it is necessary for the Local Plan document to, inter alia:

- Widen the choice of high quality homes [9];
- Positively seek opportunities to meet the development needs of the area [14];
- Contain sufficient flexibility to adapt to rapid change [14];
- Be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption in favour should apply locally [15];
- Respond positively to wider opportunities for growth [17];
- Seek to secure high quality design and good standard of amenity for all existing and future occupants of land and buildings [17];

- Boost significantly the supply of housing [47];
- Meet the full objectively assessed housing needs of the housing market area and identify key sites that are critical to delivery of the housing strategy over the plan period [47];
- Plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups [50]; and
- Be deliverable and viable [173].

Paragraph 182 goes on to confirm that, to be sound, a plan must be:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and where it is consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

a. Abbey View Produce – Background

Abbey View Produce is a third generation family run company now situated in Waltham Abbey. The company markets for over 100 acres of glasshouse production within the Lea Valley representing more than 20 independent growers some of which are also now third generation and is one of the top 100 companies in Essex.

The site directly employs circa 150 staff and secondary employment from direct suppliers in the district make up a further circa 200 staff. The Company has been based in Epping Forest district since its initial move from Covent Garden Market in early 1970's. It is a family orientated business with each of the company directors born, raised and still living within the District and there is no desire to move outside of the administrative area.

Currently the company owns 10 acres of glasshouse in its own right and has been looking to expand this to a total self-owned growing area of 100 acres (whilst retaining the 100 acres of independent growers to total 200+ acres) ideally within the local area. It is also a desire of the directorship to create a world class carbon negative facility incorporating R&D and support services within the Lea Valley where much progression is already taking place alongside historic support services and developments.

Over the last 20 years Abbey View have been trying to purchase the surrounding land to the north and west of the current site. The negotiations have never progressed significantly due to the hope values attached to the sites for residential development. In spite of the identified area being E13 (glasshouse specific) in the previously adopted plan this hope value has never subsided. The same hurdles have been met on many sites around Epping Forest District. The information structure and upfront costs of the industry are prohibitive to paying such values for land.

It is for these reasons that Abbey View Produce would look to relocate their current business. If the correct funds are raised a new site would expect to employ an additional 100-200 staff (dependent on planted crops and final size). Abbey View Produce would also like to help their landlocked grower base to expand their businesses by investing with Abbey View in the new site.

This new area would allow for extension of the season through modern glasshouse's and related growing practices, sustainable green energy centre (energy from waste), rain water collection and recycling in line with modern practices which would improve efficiencies.

b. Waltham Abbey North Masterplan Area

The Council's proposed expansion of Waltham Abbey to the north of the settlement is supported in principle by Abbey View Produce. The proposals are commensurate to the size of Waltham Abbey and will help support regeneration of the settlement and improvements to the retention of Town Centre Services and social infrastructure.

Specifically, draft allocations WAL1.R1, WAL.R2, WAL.R3 and WAL.T1 surrounding the site make provision for a minimum of 610 dwellings and associated infrastructure, including the upgrading of Galley Hill Road. Abbey View's site would become landlocked by new development on three sides, the majority of neighbours for which would consider glasshouses adjacent their properties to be a 'bad neighbour'.

From past experience, Abbey View has endured regular issues of broken glass from anti-social behaviour. In addition to the obvious cost of replacing the broken glass, further costs arise from loss of yield due to damaged environmental conditions, fruit loss due to food safety issues and productivity loss due to health and safety issues. These issues border on severe whilst on the outskirts of a populated area, relatively out of site and no through traffic (pedestrian or motor). It can only be seen that bringing population closer to such an area will only increase the number and severity of incidents, which would likely lead to the closure of some or all of the greenhouse(s) affected.

As such, it is proposed that the Council consider our client's site for redevelopment to a residential-led proposal. Subject to Abbey View Produce being able to find an appropriate relocation for their proposed expansion of the business as described above, the accompanying feasibility work seeks to highlight to the Council the level of development that could comfortably be accommodated on the site. This is indicative and has the opportunity to facilitate a higher density development.

Next steps

The redevelopment of the site need not predicate the wider Waltham Abbey masterplan initiatives and can come forward as a windfall site. The relocation of Abbey View Produce would also allow the site to contribute towards the Council maintaining a Five Year Supply.

Informal discussions regarding the relocation of the business have already taken place with the Council. In futureproofing the availability of this site for a residential-led development, the Council should ensure provisions are made to avoid large-scale vacant agricultural buildings that are not in productive use and have consequently fallen into disrepair during the plan period.

As such, our client requests that Policy P3 is amended to incorporate provisions that respect the future of the site and reflect the reality of this situation by removing the site from the Green Belt. We consider this request is fully justified in the context of sustainable development and ensuring a comprehensive solution to this issue.

Our client is a longstanding employer in the district and is keen to ensure a co-operative working relationship continues. We respectfully request that these matters are taken into consideration prior to the Council's proposed submission date of the 31st March 2018 and would be happy to facilitate a meeting to discuss further the proposed masterplan for the site and the quantum of development that could be accommodated.

Summary

With over 92% of the District designated as Metropolitan Green Belt, the Council should review where appropriate sites such as this one can contribute towards its housing land supply. I trust that the above clarifies our position in regard to emerging policy P3. We request that we are notified of the Council's proposed dates for submission in order to register our appearance at Examination. Should you wish to discuss this further, I am contactable on chutchison@iceniprojects.com

Yours sincerely,

Charlotte Hutchison
SENIOR PLANNER