
Hearing Statement for Epping Forest Local Plan Examination

Matter 5: Site Selection Methodology (SSM)

Hearing Date: 19th March 2019

- 1.1. This Hearing Statement has been prepared on behalf of Crest Nicholson (Eastern) in relation to land at Pickfield Nursery (site reference SR-0161). It has specifically been prepared to address **Matter 5: Site Selection Methodology and the Viability of Site Allocations**, and responds to the associated issues and questions raised by the Inspector to test the legal compliance and soundness of the Epping Forest District Local Plan 2011-2033 (“the emerging Local Plan”).
- 1.2. In order to make the emerging 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 P3 Waltham Abbey” and an amendment to Map 5.6 to reflect this, as shown at **Appendix 1**; and
 - An amendment to Map 5.6 to remove the delivered site Knollys Nursery (located east of Pickfield Nursery) from the Green Belt, which the emerging Local Plan currently ignores.
- 1.3. In light of our evidence put forward to-date from the outset of the emerging Local Plan preparation process, we request that Pickfield Nursery is considered thoroughly by the Inspector as it is suitable, available and deliverable for development in the first three years of the emerging Local Plan period. A summary of the site promotion that has been undertaken to date is included at **Appendix 2**.

Reponses to Matter 5 Issues and Questions

Issue 1: Have the Plan's housing allocations been chosen on the basis of a robust assessment process?

a. How was the initial pool of sites for assessment identified?

- 1.4. As explained in section 2.4 of the Council's 2016 SSR and paragraph 2.26 of the 2018 SSR, prior to undertaking the SSM, a filtering process was undertaken to sift out sites that had been identified through various sources but were considered unsuitable for assessment.
- 1.5. EFDC identified within the 2016 SSR that their starting point for identifying sites that should be subject to the SSM was the Council's 2016 Strategic Land Availability Assessment (SLAA). The Council indicated that sites identified in the SLAA were filtered out for a variety of reasons, including where they were identified in the SLAA as a duplicate site. On this basis, certain sites were not then subject to the SSM or considered any further as a potential site allocation in the emerging Local Plan.
- 1.6. Appendix B1.2.1 of the 2016 SSR identifies each site removed from the site selection process during the filtering process, and the reason(s) why the site was discounted. With regards to Pickfield Nursery, this was because the site was identified as a duplicate site (refer to **Appendix 3**).
- 1.7. Details of the Pickfield Nursery site were submitted to EFDC in response to the Call for Sites consultation in 2008 and the site has been promoted, as an individual site, through the emerging Local Plan process since its inception in 2012. EFDC's July 2012 SLAA incorrectly identified the site as a duplicate site with a much larger land parcel (site reference SR-0020).
- 1.8. Despite the submission of detailed representations and subsequent regular liaison with EFDC's officers (including a positive pre-application meeting), the 2016 SSR discounted Pickfield Nursery, once again incorrectly considering it as a duplicate site.
- 1.9. It was not until August 2017 that Pickfield Nursery was finally acknowledged as an individual site in the emerging Local Plan evidence base (in the "*Sites for consideration following Regulation 18 Consultation*" list). The site was then finally assessed as part of the 2018 SSR, where it proceeded to Stage 3 of the SSM assessment, but did not proceed to Stage 4.
- 1.10. The process of selecting the initial pool of sites for assessment is flawed because Pickfield Nursery was erroneously discounted at the initial stages of the emerging Local Plan preparation. The site only received a bespoke assessment 10 years after it was initially promoted by the objector. This came about too late in the site selection process to benefit the site, and critically, has prejudiced the potential for the site to be allocated in the emerging Local Plan as it has progressed to EiP to date. The approach has therefore been wholly unsound.

b. How was the Site Selection Methodology (SSM) utilised in the Site Selection Report 2018 (EB805) established and is it robust?

How the SSM was used in the SSR

- 1.11. Where sites proceeded past the filtering process described in response to question a. above, they have been subject to a four-stage SSM, as described between paragraphs 2.4.2 and 2.9.2 of the 2018 SSR. This can broadly be summarised as follows:

Stage 1

- 1.12. Six major NPPF and local planning policy constraints were identified for residential sites and used for the stage 1 assessment. Each site was screened against these constraints using a GIS database. The scoring against these policy constraints for stage 1 is provided in Appendix B1.3 of the 2018 SSR (see **Appendix 4** concerning the objector's site).

Stage 2

- 1.13. Stage 2 of the SSM consists of a more detailed quantitative and qualitative assessment of sites to identify the relative suitability of sites for housing. 33 assessment criteria were identified, which were grouped into six categories. For each criteria a 'Red-Amber-Green' (RAG) rating system was utilised and the assessment was completed using a combination of GIS analysis and planning judgement.
- 1.14. The output of stage 2 is an assessment proforma for each site, which are presented at Appendix B1.4.2 of the 2018 SSR (see **Appendix 5** concerning the objector's site).

Stage 3

- 1.15. The purpose of stage 3 was to identify the preferred sites, in line with the Council's growth strategy. The approach was premised around identifying the 'best' fit sites for a particular settlement and included a four-step process. The Council's assessment of the site at stage 3 is attached at **Appendix 6** alongside a summary overview of the site's assessment from stage 1 to stage 3.
- 1.16. In the first instance, the objector challenges the robustness of this process given sites are assessed firstly to fit with the Council's preferred spatial strategy at the time of the emerging Local Plan's preparation. A sound approach would be to identify all suitable, available and developable sites which are NPPF compliant first. This would then inform, alongside full housing needs and Green Belt opportunities and constraints, the Council's preferred spatial option.

Stage 4

- 1.17. Stage 4 relates to deliverability and comprised a two-fold assessment: (1) an online land promoter / developer survey; and (2) an assessment of availability and achievability. The Pickfield Nursery site was not recommended beyond stage 3 and therefore was not assessed as part of the stage 4 site assessments.

The Robustness of the SSM and Site Assessments

- 1.18. The objector does not consider that the SSM and the individual site assessments are robust for a number of reasons which are set out in further detail below.

1. Transparency and Assessment Flaws

- 1.19. The 2018 SSM is not completely transparent or documented at all stages. As an example, in stage 3 of the 2018 SSM, appendix B1.5.2 presents the results of identifying sites for further assessment (i.e. step 4 of stage 3) but does not present evidence relating to the three previous important steps in stage 3, namely the Authority's identification of suitable strategic options to accommodate growth (step 1), the assessment of the "site's suitability" (step 2) and the site's assignment against the "land preference hierarchy" (step 3).
- 1.20. The latter was a determining factor in relation to the Council's discounting of the Pickfield Nursery site at stage 3. This is notwithstanding the fact the objector had provided the Council with Environment Agency (EA) approved flood risk data confirming the site's developable area in December 2016 as part of representations to the emerging Local Plan.
- 1.21. Further, at stage 2, the Authority have given Pickfield Nursery a red score in the RAG assessment and indicated that development at the site would involve the loss of the Best and Most Versatile Agricultural Land (Grade 1-3). However, the site is clearly not being used for agricultural purposes and is a vacant, underused brownfield site.
- 1.22. Paragraph 31 of the NPPF states the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. The stage 2 assessment in the 2018 SSR did not refer to EFDC's stage 1 and 2 Green Belt Assessments, prepared by LUC, published in September 2015 and August 2016 respectively, which form an important part of the evidence base for the emerging Local Plan.
- 1.23. In addition, the stages of the site assessments did not properly take into account updated information prepared and submitted by landowners / developers which addressed the very issues the Council discounted sites on the basis of. If the information submitted by site promoters had been given due consideration, this could have alleviated the Council's concerns which would have prevented the sites being discounted.
- 1.24. The 2018 SSR omitted Pickfield Nursery from further consideration as a housing allocation in the emerging Local Plan on a number of grounds as per the comments made in the stage 3 assessment at Appendix B1.5.2 of the SSR:

- I. The site's location in Flood Zones 2, 3a and 3b;
 - II. Green Belt harm;
 - III. Landscape sensitivity; and
 - IV. BAP Priority Habitats and Local Wildlife sites.
- 1.25. The objector wrote to EFDC on 23 April 2018 with a rebuttal to this site assessment supported by evidence relating to the above matters. This is included at **Appendix 7**. We summarise how the objector has robustly addressed the Council's reasons for discounting the site throughout the process:

1. Flood Risk

- 1.26. The Pickfield Nursery site was originally rejected on the basis of flood risk when it was assessed as part of the wider land parcel SR-0020 in the July 2012 SLAA.
- 1.27. The objector has worked closely with the EA to remodel the Cobbin's Brook 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."

- 1.28. A very small percentage (under 10%) of the site is impacted by flood risk, as reflected in the EA's most up-to-date information. The site should have not therefore been discounted on this basis.

2. Green Belt

- 1.29. Pickfield Nursery's contribution to the purposes of the Green Belt is extremely limited and lower than nearby sites to the north of Waltham Abbey that have been proposed for allocation in the emerging Local Plan. It comprises predominantly previously developed land which has been derelict for over 25 years. 3 hectares of the 4.5 hectare site are characterised by a layer of overgrown scrubland and scattered glass above its hardstanding foundations (associated with the deterioration of the former horticultural greenhouses).
- 1.30. In the stage 1 Green Belt Assessment (September 2015), the site falls within the strategic Green Belt parcel DSR-068. The conclusions of the Green Belt Assessment on this parcel are that its aggregated contribution is '*weak / relatively weak*'. This is the only parcel around Waltham Abbey which has this low ranking. The strategic parcel was therefore identified as broad location for further consideration in stage 2.

- 1.31. Within the stage 2 Green Belt Assessment (August 2016) the site is located within parcel 068.1. The overall summary of harm when considering the release of Green Belt land from parcel 068.1 is described as ‘*very high*’. However, the Knollys Nursery site also located in parcel 068.1 gained planning permission in July 2016 and has now been built out (Refer to **Appendix 8** for an aerial image). It too contained previously developed land but significantly less than Pickfield Nursery whilst also lying in a more open, sensitive area in Green Belt and landscape impact terms. This is acknowledged in the emerging Local Plan’s evidence base and in the pre-application advice received from officers. Knollys Nursery therefore alters (erodes) the landscape character and Green Belt purposes within this area to the north / east of Waltham Abbey but is inexplicably ignored by the emerging Local Plan and its evidence base. Knollys Nursery also sets a precedent for the release of less sensitive Green Belt land to the west within which Pickfield Nursery is located.
- 1.32. This is recognised within LUC’s ‘*Technical Appendix: Detailed Assessment Findings*’ to the stage 2 Green Belt Assessment where consideration is given to alternative boundaries for parcel 068.1. The comments state that the land “*to the east of the Paternoster Care Home could potentially form an alternative parcel boundary, which would create a small sub-parcel in the western section of the parcel. This area includes the care home and glasshouses and open fields but also includes an area within the floodplain constraint. Development within this sub-parcel could potentially be accommodated with limited harm to the Green Belt purposes*”. The land referred to here is the Pickfield Nursery site. Our own assessment of the site against the NPPF Green Belt tests is appended at **Appendix 9**. The site should have not therefore been discounted on this basis.

3. Landscape

- 1.33. EFDC’s Sustainability Appraisal (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*”.
- 1.34. 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.
- 1.35. In relation to Pickfield Nursery, Crest Nicholson had pre-application discussions with EFDC officers in November 2013 and received positive written feedback in February 2014. In their formal response (**Appendix 10**) officers highlighted that Pickfield Nursery is suitable for development and that the landscape and visual impact would be less than that caused by development of the adjacent Green Belt site at Knollys Nursery.
- 1.36. The assessment made in the 2018 SSR (without any site visit being undertaken) is therefore contrary to advice we have received from EFDC’s officers. It is clear that in landscape and visual terms, the Pickfield Nursery site represents a logical extension to an established residential area. The site is an eyesore and offers no value to the local environment. It is well screened by established boundaries thereby limiting views into and out of the site. The site should have not therefore been discounted on this basis.

4. Ecology

- 1.37. 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.
- 1.38. A recent ecology survey undertaken by SES concludes that the site is of low biodiversity value. The site should have not therefore been discounted on this basis.

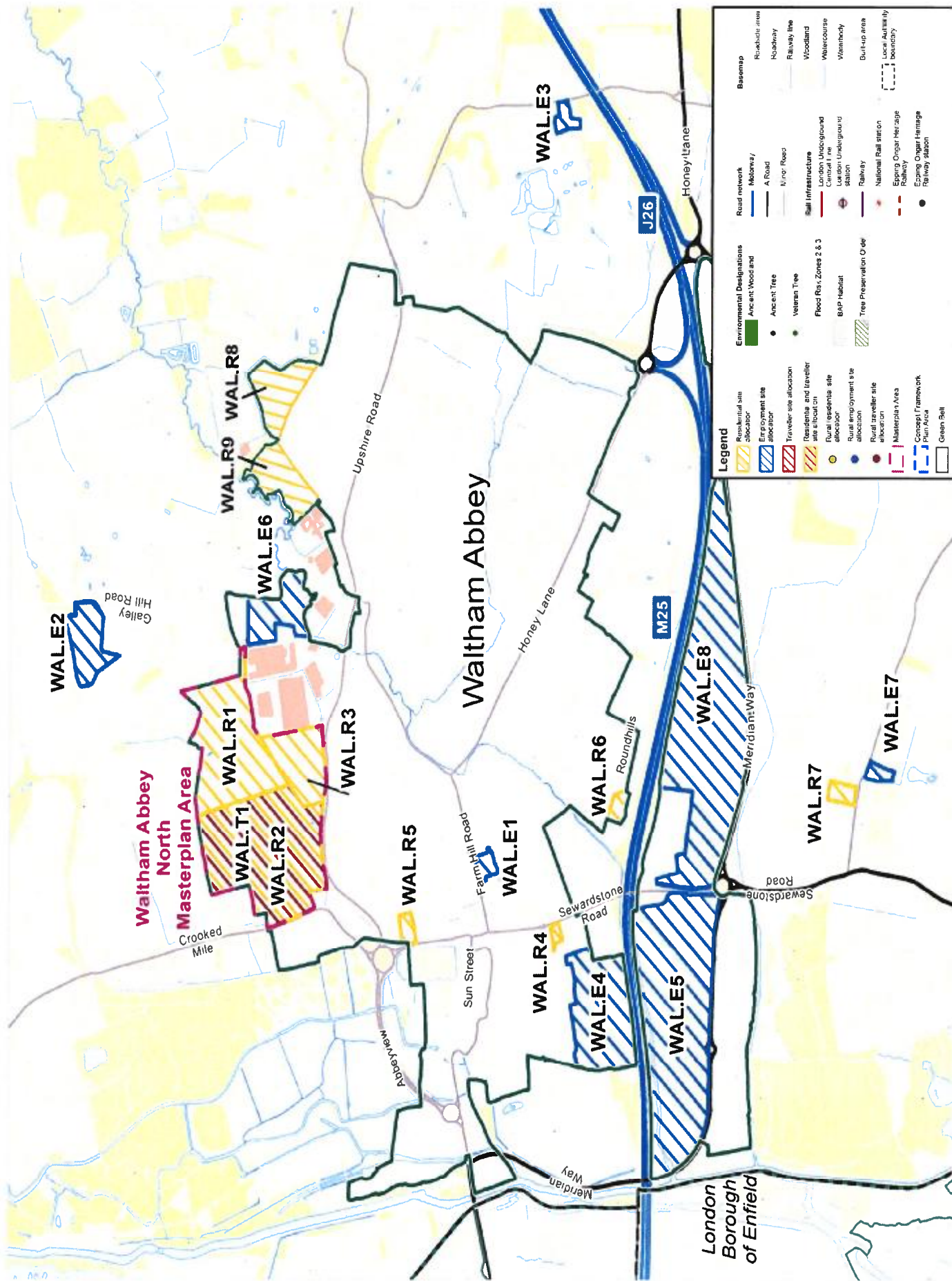
2. Council's Conflicting Evidence

- 1.39. Appendix B1.4.2 of the SSR contains the results of the RAG assessment for the 33 assessment criteria for stage 2 of the SSM. For the Pickfield Nursery site, the scoring and commentary against some of the criteria in Appendix B1.4.2 directly conflicts with the commentary in Appendix B1.5.2 which contains the results of stage 3 of the SSM.
- 1.40. For example, criteria 1.6 in stage 2 relates to impact on Local Wildlife Sites (LWS). The assessment concludes that the site is partially within the Cobbins Brook LWS and within the 250m buffer zone. It is acknowledged that the site is likely to directly affect a portion of the LWS, but it is concluded that mitigation in the form of considered masterplanning could be implemented. The stage 3 assessment, however, concludes that the site scored poorly with respect to LWS and does not draw upon the possible mitigation referenced in the previous stage.
- 1.41. In addition, criteria 2.1 in the stage 2 assessment relates to level of harm to the Green Belt and concludes that *"the level of harm caused by release of the land for development would be very low, low or medium"*. In direct contrast, the stage 3 assessment states that the site scored poorly against Green Belt harm and is one of the reasons that the site did not proceed to stage 4 of the SSM.
- 1.42. Similarly, there is inconsistency in the stage 2 and stage 3 assessments for Pickfield Nursery with respect to landscape sensitivity (criteria 5.1 of the stage 2 assessment). The stage 2 assessment concludes that the site falls within a medium landscape sensitivity area, where characteristics of the landscape are resilient to change and able to absorb development without significant impact. Landscape sensitivity is, however, used as a reason for discounting the site at stage 3; again a conflict.

2. How were the conclusions reached about individual sites checked for accuracy and consistency?
Were sites visited or were they assessed through a desk-top process?

- 1.43. The conclusions reached about the Pickfield Nursery site in the 2018 SSR have clearly not been checked for accuracy and consistency. The landowner confirmed that no site visits have been made since 2008 when the site was originally promoted through the Council's Call for Sites exercise.
- 1.44. Aerial images do not illustrate the vast extent of hardstanding across the site, which appears as green space on Google Earth imagery. The fact that the site has not been assessed in person significantly undermines the robustness of the site selection process.

Appendix 1 – Proposed Amendment to Map 5.6



Appendix 2 – Site Promotion to Date

Appendix 1

Background

The former Pickfield Nursery site extends to 4.5 hectares and lies adjacent to the northern settlement boundary of Waltham Abbey, one of the District's main settlements and subsequently one of the focuses of future housing growth.

The surrounding residential development, infrastructure, and fixed physical features create existing boundaries on all sides: residential dwellings to the south, Paternoster House Care Home to the west, a small commercial operation to the east and Cobbins Brook (forming a permanent boundary) to the north. These boundaries are reinforced by mature tree planting, which help screen views, define character within the site and ensure that there is no sprawl into the open countryside. As such, the former Pickfield Nursery site represents a natural and logical extension to the existing settlement boundary.

Although within the Green Belt, the former Pickfield Nursery site comprises predominantly previously developed land. From the 1960s up until the 1980s, the site was used as a commercial plant nursery. Its operations declined during the 1980s, and in October 1987, a number of glasshouses were destroyed in 'the great storm' and all commercial activity on the site ceased shortly afterwards.

Today, approximately 3 hectares of the site still consists of hard-standing and foundations associated with the former glasshouses. It is now overgrown and extensively covered with broken glass and rubble, representing a safety hazard and a visual blight on the landscape.

The high cost of remediating the site makes any form of future commercial horticultural use unviable. The former nursery represents a logical housing site between an area of established residential character and Cobbin's Brook to the north. Permanent existing boundaries mean that residential development of the site will not lead to sprawl into the wider, open Green Belt. Pickfield Nursery has good links to existing transport networks and infrastructure, and has provisions for access in place. Its redevelopment will significantly enhance the existing environment, improve local access and pedestrian linkage to the countryside, create new public open space (including a brook-side sensory garden for the adjacent care home) and provide ecological enhancements to Cobbin's Brook.

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. EFDC's July 2012 SLAA referred to Pickfield Nursery as site SR-0161 but incorrectly identified it as a duplicate site with a much larger parcel (SLAA Reference SR-0020). A time of events is shown in Figure 1 below.

Representations were then submitted in October 2012 highlighting this mistake. However, despite the submission of detailed representations and subsequent regular liaison with EFDC's officers (including a positive formal pre-application meeting in 2013), EFDC's Site Selection evidence base published in 2016 discounted Pickfield Nursery prior to Stage 1 of the selection process, once again incorrectly considering it as a duplicate site.

Pickfield Nursery was finally acknowledged as an individual site in the Local Plan evidence base in the "Sites for consideration following Regulation 18 consultation" list published in July 2017. However, 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 Selection Report, March 2018, site SR-0161-N) is contrary to the advice from statutory consultees and their own Development Control and Landscape officers. These are referred to in previous representations.

These 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.

Figure 1

Date	Details of Site Promotion / Consideration
October 2008	Pickfield Nursery Submitted in response to EFDC's Call for Sites process.
July 2012	The July 2012 SHLAA referred to Pickfield Nursery as site SR-0161 but incorrectly identified it as a duplicate site with a much larger parcel of land (SR-0020).
October 2012	Representations submitted to EFDC's Issues and Options Consultation, highlighting the mistake in the 2012 SHLAA.
November 2013	Positive pre-application meeting with EFDC officers during which it was made clear that the site was being promoted separately to the wider site at Paternoster Hill
February 2014	Another positive pre-application meeting with officers took place. Formal feedback provided by EFDC officers reflecting positive discussions at pre-application meeting.
December 2016	Detailed representations submitted to the Draft Local Plan, including supporting evidence.
July 2017	Pickfield Nursery finally acknowledged as an individual site in the Local Plan evidence base in the "Sites for consideration following Regulation 18 consultation" list published in July 2017.
January 2018	Detailed representations submitted to the Submission Local Plan consultation.
March 2018	Pickfield Nursery assessed in the Site Selection Report. The assessment is contrary to the advice from statutory consultees and EFDC's landscape and development control officers.
April 2018	Representations made in respect of the March 2018 Site Selection Report addressing the issues set out in the site assessment, including on matters of Green Belt, landscape impact, ecology and flooding with supporting evidence.

Appendix 3 – Extract from Appendix B1.2.1 of the 2016 SSR

B1.2.1 Residential and Employment Sites Discounted from the Assessment

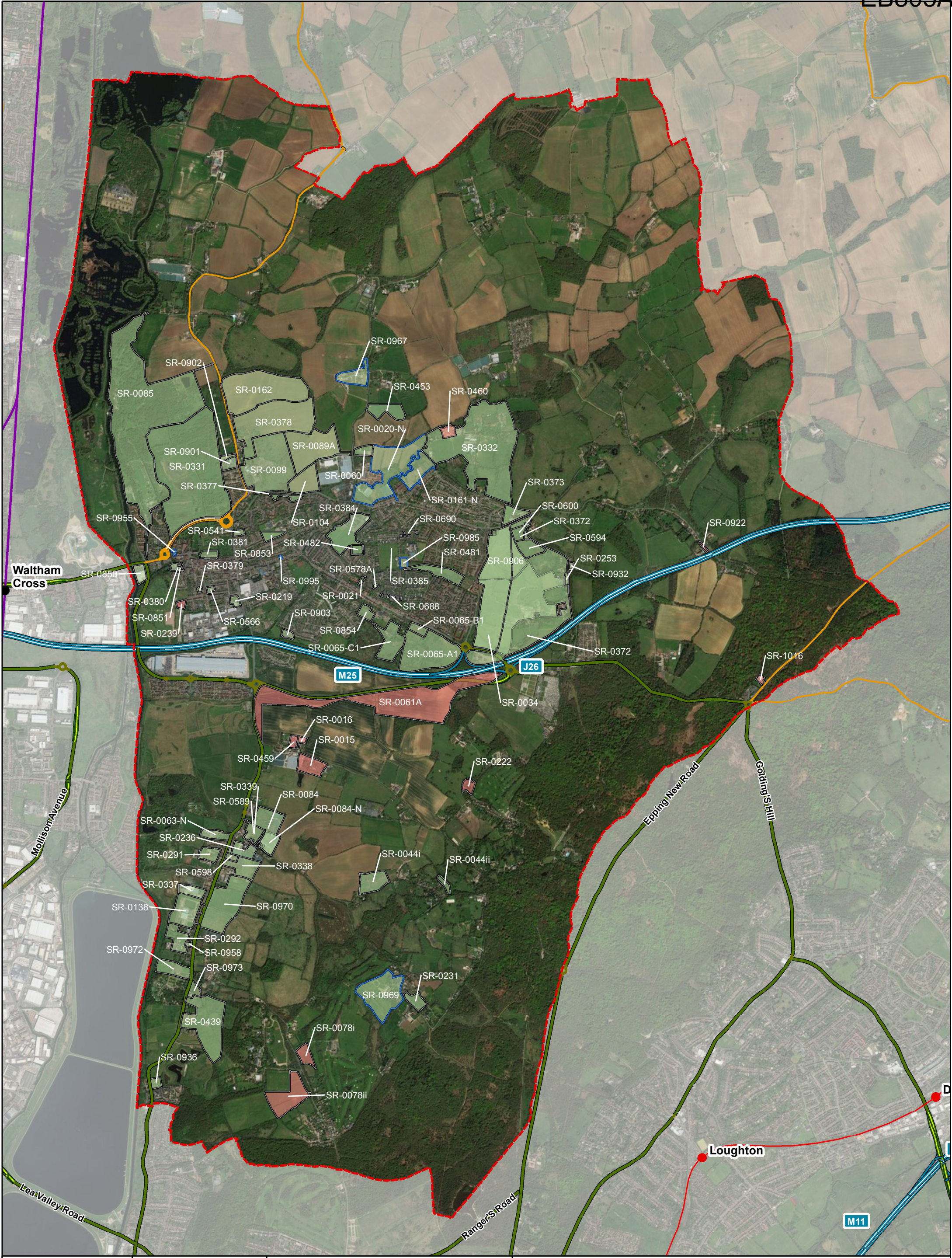
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Appendix B1.2.1 Residential and Employment Sites Discounted from the Assessment

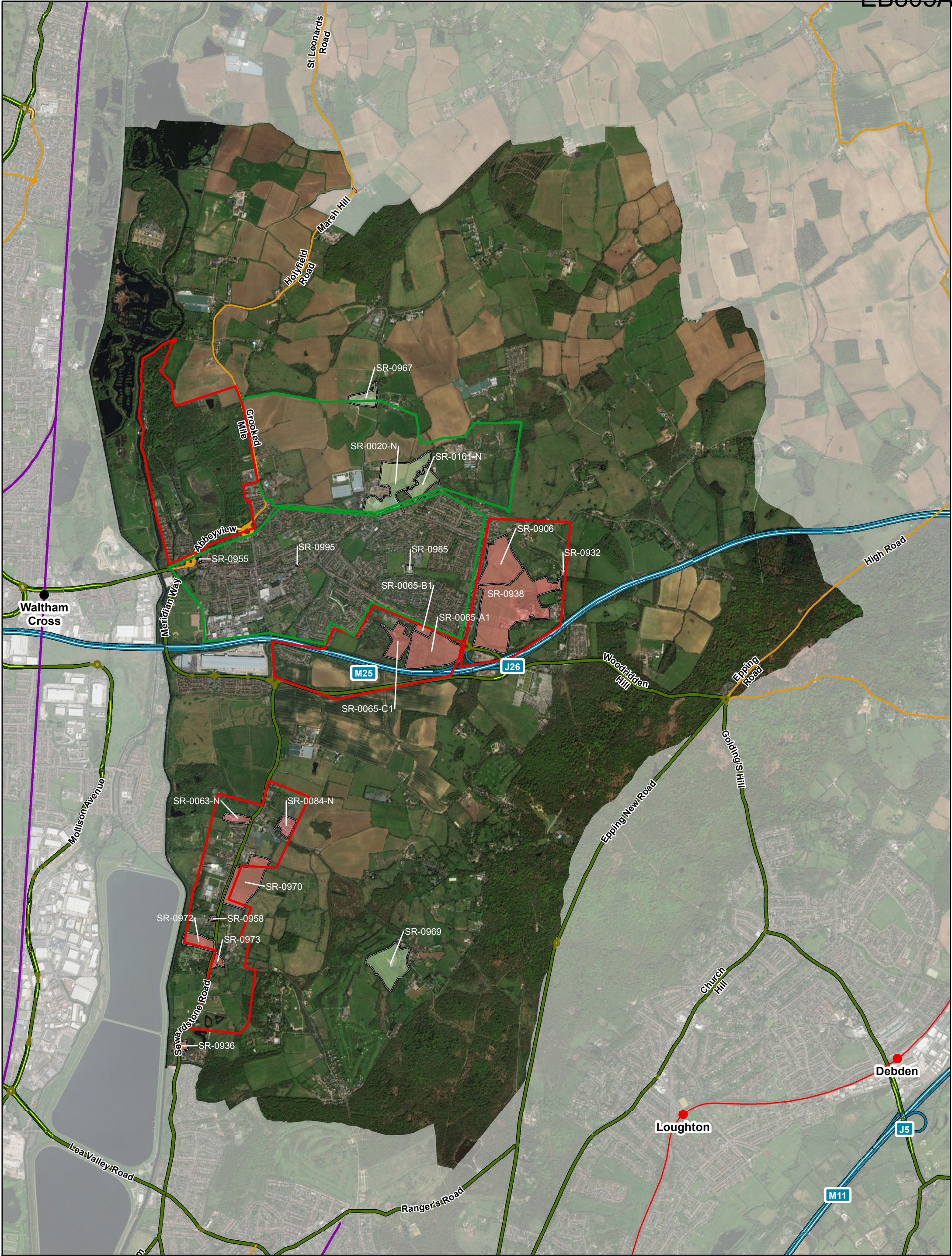
Site Ref	Address	Parish	Primary Use	Source of Site	Justification	Tranche at which site was discounted	Planning Permission Ref (if applicable)
SR-0159	Bansons Yard, High Street, Chipping Ongar, Essex, CM5 9AR	Ongar	Residential	Call For Sites 2008	Filtered (commitment). Planning permission granted for residential development.	Tranche 1	EPF/0461/13
SR-0161	Pickfield Nursery, Pick Hill, Waltham Abbey, Essex	Waltham Abbey	Residential	Call For Sites 2008	Site identified in the Strategic Land Availability Assessment (2016) as being a duplicate site.	Tranche 1	N/A
SR-0163	Land to the rear of Tregarth, Grange Lane, Roydon, Essex	Roydon	Residential	Call For Sites 2008	Below site threshold (number of dwellings, and site size).	Tranche 1	N/A
SR-0173	Fyfield Research and Business Park, Fyfield Road, Chipping Ongar, CM5 0GZ	Ongar	Employment	Call for Sites 2008	Employment Land Supply Assessment (2017) concluded that there was no scope for expansion of this existing employment site. Site therefore withdrawn from site selection process.	Tranche 2	N/A
SR-0174	The Street, Willingale, Near Ongar, Essex	Willingale	Residential	Call For Sites 2008	Below site threshold (number of dwellings, and site size).	Tranche 1	N/A
SR-0180	Steel's Transport Yard, Little Laver / Mill House and Mill Cottage, Little Laver, CM5	Moreton, Bobbingworth and the Lavers	Residential	Call For Sites 2008	Below site threshold (number of dwellings, and site size).	Tranche 1	N/A
SR-0187	Land adjacent No. 2 Pump Lane, Epping Green	Epping Upland	Residential	Call For Sites 2008	Below site threshold (number of dwellings, and site size).	Tranche 1	N/A
SR-0192	Land adjacent to Mill House Farm, Bell Common, Epping, Essex	Epping	Residential	Call for Sites 2008	Site boundary has been amended and been superseded by site reference SR-0192-N.	Tranche 2	N/A
SR-0198	Plot of approx 9 acres, to north of Shillibeer Walk	Chigwell	Residential	Call For Sites 2008	Site identified in the Strategic Land Availability Assessment (2016) as being a duplicate site.	Tranche 1	N/A
SR-0202	Threshers, Hastingwood Road, Hastingwood, Nr Harlow, Essex	North Weald Bassett	Residential	Call For Sites 2008	Filtered (commitment). Planning permission granted for residential development.	Tranche 1	EPF/0739/10
SR-0204	Netherhouse Farm, Sewardstone Road, Waltham Abbey, E4 7RJ 1.4 ha site	Waltham Abbey	Residential	Call For Sites 2008	Site identified in the Strategic Land Availability Assessment (2016) as being a duplicate site.	Tranche 1	N/A
SR-0209	Broxlea Nursery, Nursery Road, Nazeing, Essex, EN9 2JE	Epping	Residential	Call For Sites 2008	Site has been promoted for employment uses and has been superseded by site reference SR-0946.	Tranche 2	N/A
SR-0211	Stewarts Farm, School Road, Stanford Rivers, Ongar, Essex	Stanford Rivers	Employment	Call for Sites 2008	Site has been superseded as part of the Employment Land Supply Assessment (2017) site by site SR-0211-N.	Tranche 2	N/A
SR-0214	Land adjacent Brickfield Wood, off Old House Lane, Roydon	Roydon	Residential	Call For Sites 2009 and updated in Call for Sites 2013	Site boundary has been amended and superseded by site reference SR-0964-Z.	Tranche 2	N/A
SR-0215	Land next to Tanfield Nursery, Old House Lane, Roydon, Harlow, Essex, CM19 5DN	Roydon	Residential	Call For Sites 2009	Below site threshold (number of dwellings, and site size).	Tranche 1	N/A
SR-0221	Former BPI Unit, Brook Road, Buckhurst Hill, IG9 5TU	Buckhurst Hill	Residential	Call For Sites 2009	Filtered (commitment). Planning permission granted.	Tranche 1	EPF/0446/10
SR-0224	Allotments, Adjacent to 1-3 Coopers Hill, Chipping Ongar, Essex, CM5 9EE	Ongar	Residential	Call For Sites 2009	Below site threshold (number of dwellings, and site size).	Tranche 1	N/A
SR-0230	Former electricity sub-station, off station way, Roding Valley, Buckhurst Hill, IG9	Buckhurst Hill	Residential	Call For Sites 2009	Filtered (commitment). Planning permission granted for residential development.	Tranche 1	EPF/2696/13
SR-0233	Nazelow, Sedge Green, Roydon, Essex, CM19 5JR	Roydon	Residential	Call For Sites 2009	Below site threshold (number of dwellings, and site size).	Tranche 1	N/A
SR-0242	Land situated at Oak Hill Road, Stapleford Abbots and Havering-atte-Bower, Essex	Stapleford Abbots	Residential	Call for Sites 2010	Site boundary has been amended and been superseded by site reference SR-0242-N.	Tranche 2	N/A
SR-0248	The Stables, Grove Lane, Chigwell Row, Essex, IG7 6JQ	Chigwell	Residential	Call For Sites 2011	Planning permission has been granted for development of part of this site, with the remainder transferred to the Parish Council, and therefore it is a commitment and should be removed from the pre-Stage 1 sift.	Tranche 1	EPF/1891/15

Appendix 4 – Extract from Appendix B1.3 of the 2018 SSR

B1.3 Results of Stage 1 and Stage 6.1A/B Assessment



Report on Site Selection ARUP Epping Forest District Council	Drawing No. EFDC-S1-0021-Rev2	Content Results of Stage 1 and Stage 6.1A Assessment for Residential Sites in Waltham Abbey <small>Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo and the GIS User Community. Contains Ordnance Survey & Royal Mail Data (c) Crown Copyright & Database Right 2016 EFDC License No: 100018534 2016</small>	Legend Site does not proceed Tranche 1 site proceeds to Stage 2 Tranche 2 site proceeds to Stage 6.1B Parish Boundary N This legend shows only key map symbology. A full legend can be found at the beginning of the Appendix.
	Date: March 2018		
	Scale: 1:27,500 @A3		



Report on Site Selection ARUP Epping Forest District Council	Drawing No. EFDC-S1B-0021-Rev2	Content Results of Stage 6.1B Assessment for Residential Sites in Waltham Abbey <small>Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo and the GIS User Community. Contains Ordnance Survey & Royal Mail Data (c) Crown Copyright & Database Right 2016 EFDC License No: 100018534 2016</small>	Legend Site does not proceed Site proceeds at Stage 6.1B More suitable strategic option Less suitable strategic option	
	Date: March 2018			
	Scale: 1:30,000 @A3			

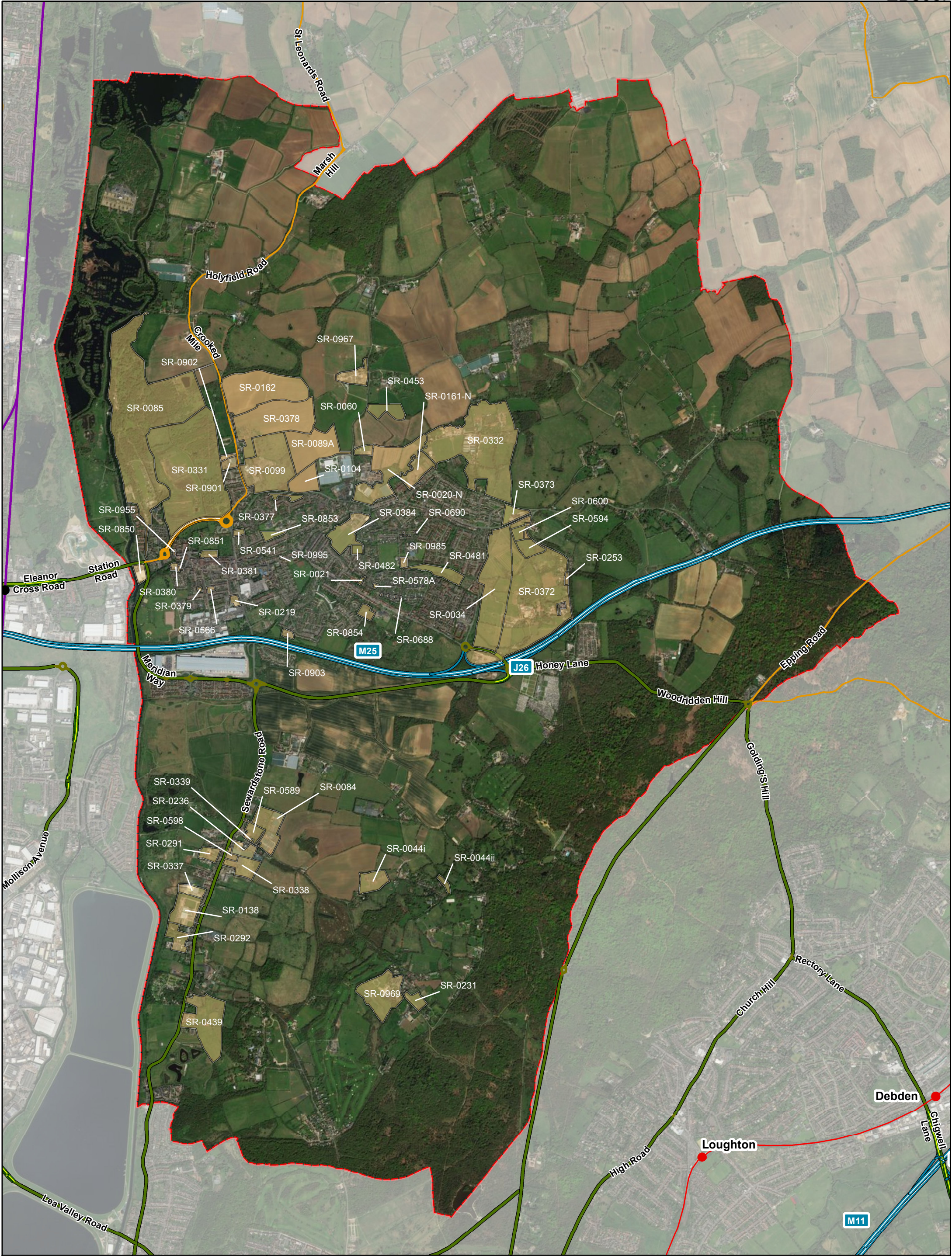
This legend shows only key map symbology. A full legend can be found at the beginning of the Appendix.

Appendix B1.3
Results of Stage 1 and Stage 6.1A/B Assessment for Residential Sites in
Waltham Abbey

Site Reference	Site Address	Parish	Primary Use	1. Site entirely located outside Settlement Buffer Zones	2. Site entirely constrained by Flood Risk Zone 3B	3. Sites is entirely constrained by an internationally designated sites of importance for biodiversity	4. Site is entirely constrained by County owned or managed wildlife site or Council owned or managed Local Nature Reserve	5. Site entirely constrained by Epping Forest and its Buffer Land	6. Site entirely constrained by HSE Consultation Zones Inner Zone	Overall	Stage 1 /Stage 6.1A Result	Stage 1/Stage 6.1A Justification	Stage 6.1B Result	Stage 6.1B Justification	Overall Stage 1/Stage 6.1 Site Status	Stage 1/Stage 6.1 Justification
SR-0015	Providence Nursery, Normandy Nursery and Sarina Nursery	Waltham Abbey	Residential	Yes	No	No	No	No	No	Yes	Does not proceed	Site is located outside Settlement Buffer Zones.	Not Applicable	Not Applicable	Does not proceed	Site is located outside Settlement Buffer Zones.
SR-0016	Culora, Beechview Nursery, Avey Lane, Waltham Abbey, Essex, EN9 3QH	Waltham Abbey	Residential	Yes	No	No	No	No	No	Yes	Does not proceed	Site is located outside Settlement Buffer Zones.	Not Applicable	Not Applicable	Does not proceed	Site is located outside Settlement Buffer Zones.
SR-0020-N	Land at Paternoster Hill, Waltham Abbey, Essex, EN9 3JY	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Proceed	Site is located entirely or partially within a more suitable strategic option and will progress to Stage 6.2.	Proceed	Site is entirely or partially unconstrained by Major Policy constraints. Site is located entirely or partially within a more suitable strategic option and will progress to Stage 6.2.
SR-0021	Land lying to the north of Honey Lane and west of Mason Way, Ninefields, Waltham Abbey, Essex	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.
SR-0034	Land to east of Waltham Abbey	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.
SR-0044i	The Manor Farm, Mott Street, High Beech, Loughton, Essex, IG10 4AP	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.
SR-0044ii	The Manor Farm, Mott Street, High Beech, Loughton, Essex, IG10 4AP	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.
SR-0060	Land at Patches Farm, Waltham Abbey	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.
SR-0061A	Land adjacent to north and south of A121, south of Waltham Abbey	Waltham Abbey	Residential	Yes	No	No	No	No	No	Yes	Does not proceed	Site is located outside Settlement Buffer Zones.	Not Applicable	Not Applicable	Does not proceed	Site is located outside Settlement Buffer Zones.
SR-0063-N	Former Haulage Yard, Sewardstone Hall, Sewardstone Road, Sewardstone, London, E4 7RH	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Does not proceed	Site is located entirely within a less suitable strategic option and will not progress to Stage 6.2.	Does not proceed	Site is entirely or partially unconstrained by Major Policy constraints. Site is located entirely within a less suitable strategic option and will not progress to Stage 6.2.
SR-0065-A1	Land at Honey Lane, Waltham Abbey, EN9 3AY	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Does not proceed	Site is located entirely within a less suitable strategic option and will not progress to Stage 6.2.	Does not proceed	Site is entirely or partially unconstrained by Major Policy constraints. Site is located entirely within a less suitable strategic option and will not progress to Stage 6.2.
SR-0065-B1	Land South of Honey Lane, Waltham Forest, EN9 3BA	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Does not proceed	Site is located entirely within a less suitable strategic option and will not progress to Stage 6.2.	Does not proceed	Site is entirely or partially unconstrained by Major Policy constraints. Site is located entirely within a less suitable strategic option and will not progress to Stage 6.2.
SR-0065-C1	Land to South of Honey Lane, Waltham Abbey, Essex, EN9 3BA	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Does not proceed	Site is located entirely within a less suitable strategic option and will not progress to Stage 6.2.	Does not proceed	Site is entirely or partially unconstrained by Major Policy constraints. Site is located entirely within a less suitable strategic option and will not progress to Stage 6.2.
SR-0078i	Sovereign Fields, Bury Road, Sewardstonebury Chingford, London, E4 7QN	Waltham Abbey	Residential	Yes	No	No	No	No	No	Yes	Does not proceed	Site is located outside Settlement Buffer Zones.	Not Applicable	Not Applicable	Does not proceed	Site is located outside Settlement Buffer Zones.
SR-0078ii	Sovereign Fields, Bury Road, Sewardstonebury Chingford, London, E4 7QN	Waltham Abbey	Residential	Yes	No	No	No	No	No	Yes	Does not proceed	Site is located outside Settlement Buffer Zones.	Not Applicable	Not Applicable	Does not proceed	Site is located outside Settlement Buffer Zones.
SR-0084	Pendowe and Grange Hill Nursery, Sewardstone Road Daines Nursery, Sewardstone Nursery, Pritchard's Nursery, Mott Street Nursery, Cedar Lodge, Mott Street, London E4	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.
SR-0084-N	Pritchards Nursery, Mott Street, Waltham Abbey, London, E4 7RW	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Does not proceed	Site is located entirely within a less suitable strategic option and will not progress to Stage 6.2.	Does not proceed	Site is entirely or partially unconstrained by Major Policy constraints. Site is located entirely within a less suitable strategic option and will not progress to Stage 6.2.
SR-0085	Former Royal Gunpowder Factory Site, Beaulieu Drive, Waltham Abbey, Essex, EN9 1JY	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.
SR-0089A	Land Lying to the west side of Galley Hill Road, Northern Portion	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.
SR-0099	Lea Valley Nursery, Crooked Mile, Waltham Abbey	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.
SR-0104	Land adjoining Parklands, Waltham Abbey	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.
SR-0138	Northfield Nurseries, Sewardstone Road, E4 7RG	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.
SR-0161-N	Pickfield Nursery, Pick Hill, Waltham Abbey, Essex, EN9 3LB	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Proceed	Site is located entirely or partially within a more suitable strategic option and will progress to Stage 6.2.	Proceed	Site is entirely or partially unconstrained by Major Policy constraints. Site is located entirely or partially within a more suitable strategic option and will progress to Stage 6.2.
SR-0162	Land lying to the east of the Crooked Mile, adjacent to Claggate Lane/ Eagle Gate	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.
SR-0219	Fire Station, Sewardstone Road, Waltham Abbey, Essex, EN9 1PA	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.
SR-0222	The Rockery, Pynest Green Lane, High Beech, EN9 3QL	Waltham Abbey	Residential	Yes	No	No	No	No	No	Yes	Does not proceed	Site is located outside Settlement Buffer Zones.	Not Applicable	Not Applicable	Does not proceed	Site is located outside Settlement Buffer Zones.
SR-0231	Land at Lippitts Hill (Adjacent Owl PH/ Owl caravan park), High Beach, Loughton, IG10 4AL	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.
SR-0236	Brooklyn Nursery (and other nurseries) off Mott Street, Sewardstone, Chingford	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.
SR-0239	Town Mead Depot, Orchard Gardens, Waltham Abbey, EN9 1RS	Waltham Abbey	Residential	Yes	No	No	No	No	No	Yes	Does not proceed	Site is located outside Settlement Buffer Zones.	Not Applicable	Not Applicable	Does not proceed	Site is located outside Settlement Buffer Zones.
SR-0253	Land at Woodgreen Farm, Honeypot Lane, Waltham Abbey, Essex, EN9 3SG	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.
SR-0291	Sewardstone Lane, Rear of Butlers Drive	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.
SR-0292	Sewardstone Lane (near Chapel Field Nursery)	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.
SR-0331	Waltham Abbey, north-west area	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.
SR-0332	Waltham Abbey, north-east area	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.
SR-0337	Hannah Nursery Sewardstone Road	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.
SR-0338	Brookfield Nursery/Sewardstone Road, London E4 7RJ	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.
SR-0339	Land to rear of The Plough pub, Mott Street, Sewardstone	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.
SR-0372	Land west of Woodgreen Road, including Southend Lane and Skillet Hill Farm	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.
SR-0373	Upshire Primary School	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.
SR-0377	Parklands/Newteswell Drive amenity open space	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.
SR-0378	Crooked Mile Allotments and adjacent land	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.
SR-0379	Land off Town Mead Road	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.
SR-0380	Green Yard Car Park	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.
SR-0381	Darby Drive / Abbey Gardens Car Park	Waltham Abbey	Residential	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.	Not Applicable	Not Applicable	Proceed	Site is entirely or partially unconstrained.

Appendix 5 – Extract from Appendix B1.4.2 of the 2018 SSR

B1.4.2 Results of Stage 2 and Stage 6.2 Assessment



<div>Report on Site Selection</div> <div>ARUP</div> <div>Epping Forest District Council</div>	<div>Drawing No.</div> <div>EFDC-S2-0027-Rev2</div>	<div>Content</div> <div>Residential Sites for Stage 2 and Stage 6.2 Assessment in Waltham Abbey</div> <div>Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo and the GIS User Community.</div> <div>Contains Ordnance Survey & Royal Mail Data (c) Crown Copyright & Database Right 2016 EFDC License No: 100018534 2016</div>	<div>Legend</div> <div><div></div> Residential sites assessed at Stage 2 and Stage 6.2</div> <div><div></div> Parish Boundary</div> <div>This legend shows only key map symbology. A full legend can be found at the beginning of the Appendix.</div>
	<div>Date: March 2018</div>		
	<div>Scale: 1:27,500 @A3</div>		

Site Suitability Assessment

Site Reference: SR-0161-N
Parish: Waltham Abbey
Size (ha): 4.22
Address: Pickfield Nursery, Pick Hill, Waltham Abbey, Essex, EN9 3LB

Primary use: Residential
Site notes: Former nursery, hardstanding and foundations associated with former glasshouses

Baseline yield: 100 dwellings

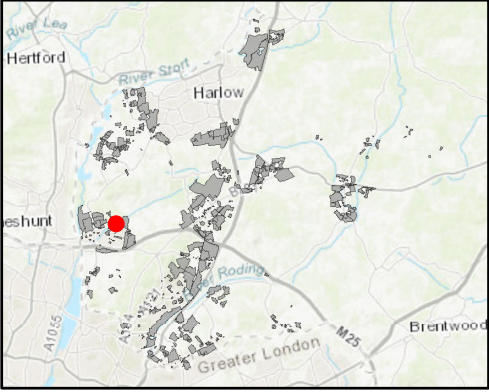
Source for baseline yield: Indicated in representation to Draft Local Plan consultation

Site constraints: Flood constraint on northern edge of site (5% of site area). However, proposed site layout provided by promoter accounts for this constraint and the affected areas are not proposed for development (open space). No adjustment made to capacity.

Site selection adjustment: None

Community feedback: Feedback was received on WAL-E which is within or near to this site. Refer to Appendix B1.4 for further details.

Dwellings: 100



Client
Epping Forest District Council

Job Title
Epping Forest District Local Plan

Drawing Status	Date
Issue	March 2018

Drawing No	Issue
SR-0161-N	Rev 1

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Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



Criteria	Score		Qualitative Assessment
1.1 Impact on Internationally Protected Sites	0	Effects of allocating site for the proposed use do not undermine conservation objectives (alone or in combination with other sites).	Very small parts of the site are within 2000m of either Epping Forest Special Area of Conservation or Lee Valley Special Protection Area. In-combination effects from recreational pressure likely to be avoidable.
1.2 Impact on Nationally Protected sites	(-)	Site falls within an Impact Risk Zone and due to the nature and scale of development proposed it is likely to be possible to mitigate the effects of the proposed development.	Due to the development type (over 50 residential dwellings), development of the site is likely to pose a risk and consultation with Natural England is required. However, it is likely that mitigation to reduce the risk would be possible.
1.3a Impact on Ancient Woodland	0	Site is not located within or adjacent to Ancient Woodland.	
1.3b Impact on Ancient/Veteran Trees outside of Ancient Woodland	0	No Ancient or Veteran trees are located within the site.	
1.4 Impact on Epping Forest Buffer Land	0	Site is unlikely to impact on Epping Forest Buffer Land.	
1.5 Impact on BAP Priority Species or Habitats	(--)	Features and species in the site unlikely to be retained and effects cannot be mitigated.	The site is wholly within an area of Deciduous Woodland, and its relevant buffer zone. The site is likely to directly affect almost all of the BAP priority habitat and effects may not be mitigable.
1.6 Impact on Local Wildlife Sites	(-)	Features and species in the site may not be retained in their entirety but effects can be mitigated.	The site is partially within the Cobbins Brook LWS and within the 250m buffer zone. The site is likely to directly affect a portion of the Local Wildlife Site, but mitigation in the form of considered masterplanning could be implemented.
1.7 Flood risk	(+)	Site within Flood Zone 2 and exception test not required.	Some 33% of the site in Flood Zone 2, of which some 15% and 5% is in Flood Zone 3a and 3b respectively. Flood Zones 2, 3a and 3b are located through the north of the site and can be avoided through site layout.
1.8a Impact on heritage assets	(+)	Site is not likely to affect heritage assets due to their distance from the site.	Unlikely to impact on settings of Scheduled Monument or Conservation Area due to distance from site and visual break created by the road.
1.8b Impact on archaeology	(-)	Existing evidence and/or a lack of previous disturbance indicates a high likelihood for the discovery of high quality archaeological assets on the site.	
1.9 Impact of air quality	0	Site lies outside of areas identified as being at risk of poor air quality.	
2.1 Level of harm to Green Belt	(-)	Site is within Green Belt, where the level of harm caused by release of the land for development would be very low, low or medium.	
3.1 Distance to the nearest rail/tube station	(-)	Site is more than 4000m from the nearest rail or tube station.	
3.2 Distance to nearest bus stop	(+)	Site is within 400m of a bus stop.	
3.3 Distance to employment locations	(+)	Site is within 1600m of an employment site/location.	
3.4 Distance to local amenities	0	Site is between 1000m and 4000m from nearest town, large village or small village.	
3.5 Distance to nearest infant/primary school	0	Site is between 1000m and 4000m from the nearest infant/primary school.	
3.6 Distance to nearest secondary school	0	Site is between 1000m and 4000m from the nearest secondary school.	
3.7 Distance to nearest GP surgery	0	Site is between 1000m and 4000m from the nearest GP surgery.	
3.8 Access to Strategic Road Network		Not applicable.	
4.1 Brownfield and Greenfield Land	(-)	Majority of the site is greenfield land adjacent to a settlement.	95% greenfield site, adjacent to an existing settlement (Waltham Abbey).
4.2 Impact on agricultural land	(--)	Development of the site would involve the loss of the best and most versatile agricultural land (grades 1-3).	
4.3 Capacity to improve access to open space	(-)	Development may involve the loss of public open space but there are opportunities for on-site off-setting or mitigation.	Open space is located in 6% of the site area. Development may involve the loss of woodland. An existing site masterplan identifies opportunities to provide new public open space in the development proposal.
5.1 Landscape sensitivity	(-)	Site falls within an area of medium landscape sensitivity - characteristics of the landscape are resilient to change and able to absorb development without significant character change.	Site shares characteristics with the adjacent zone of moderate sensitivity. The form and extent of any development would have to be sensitive to the location to avoid potential adverse impact on adjacent landscape character area.
5.2 Settlement character sensitivity	0	Development is unlikely to have an effect on settlement character.	Site is identified as a potential regeneration area and is on the edge of the existing modern extension to the settlement. Proposed density unlikely to impact settlement character
6.1 Topography constraints	0	No topography constraints are identified in the site.	
6.2a Distance to gas and oil pipelines	0	Gas or oil pipelines do not pose any constraint to the site.	
6.2b Distance to power lines	0	Power lines do not pose a constraint to the site.	
6.3 Impact on Tree Preservation Order (TPO)	0	The intensity of site development would not be constrained by the presence of protected trees either on or adjacent to the site.	
6.4 Access to site	(+)	Suitable access to site already exists.	Existing access from Pick Hill.
6.5 Contamination constraints	(-)	Potential contamination on site, which could be mitigated.	Potential contamination (Horticultural Nursery). Potential adverse impact could be mitigated.
6.6 Traffic impact	(-)	Low level congestion expected at peak times within the vicinity of the site.	B653

Appendix 6 – Extracts from Appendix B1.5.2 and B1.1

B1.5.2 Results of Identifying Sites for Further Testing

Drawing No.
EFDC-S3-0021-Rev2

Date: March 2018

Scale: 1:15,000 @A3

Content

Results of Stage 3 and Stage 6.3 Assessment for Residential Sites in Waltham Abbey

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo and the GIS User Community.

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Legend

Strategic Options

☐ More suitable strategic option

☐ Less suitable strategic option

Stage 3/6.3 Sites

 Suitable

■ Not Suitable

☐ Site proceeds for further testing

☐ Site does not proceed for further testing

B784



Site Ref.	Address	Settlement	Site Size (Ha)	Capacity (Units)	Site Suitability	Justification for Site Suitability	Site Rank			Site Category	Site to Proceed for Further Testing
							Flood Risk	Location	Agricultural Land		
SR-0020-N	Land at Paternoster Hill, Waltham Abbey, Essex, EN9 3JY	Waltham Abbey	13.92	367	Not Suitable	<p>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.</p> <p>However, 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, and impact on landscape, 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.</p>				N/A	The site did not proceed for further testing beyond Stage 3.
SR-0021	Land lying to the north of Honey Lane and west of Mason Way, Ninefields, Waltham Abbey, Essex	Waltham Abbey	0.23	10	Suitable	This site is in a sustainable location in Waltham Abbey. Although access constraints are identified at Stage 2, it was considered that it may be possible to overcome these. The site continued to proceed.	2	2	1	7	This site was considered to be suitable but 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. It did not proceed for further testing beyond Stage 3.
SR-0034	Land to east of Waltham Abbey	Waltham Abbey	21.76	500	Not Suitable	This site falls within a strategic option which was considered to be less suitable.				N/A	The site did not proceed for further testing beyond Stage 3.
SR-0060	Land at Patches Farm, Waltham Abbey	Waltham Abbey	1.14	34	Suitable	This site scored poorly against several criteria at Stage 2, including site access and contamination constraints, but it was considered that these constraints may be overcome. The site continued to be considered strategically with adjacent site SR-0375.	1	7	3	7	This site was considered to be suitable but 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. It did not proceed for further testing beyond Stage 3.
SR-0085	Former Royal Gunpowder Factory Site, Beaulieu Drive, Waltham Abbey, Essex, EN9 1JY	Waltham Abbey	62.43	100	Not Suitable	This site falls within a strategic option which was considered to be less suitable.				N/A	The site did not proceed for further testing beyond Stage 3.
SR-0089A	Land Lying to the west side of Galley Hill Road, Northern Portion	Waltham Abbey	11.28	205	Suitable	<p>The site scored poorly against several criteria at Stage 2 including impact on Lee Valley SPA and landscape sensitivity, but it was considered that these constraints may be overcome.</p> <p>This site did not proceed for further testing 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 is greenfield land not adjacent to a settlement and there are a sufficient number of sites within the settlement that are ranked more favourably. However, the site was re-considered as part of Stage 6.3 in 2017 to support the Local Plan Technical Assessment Testing, which considered whether higher levels of residential growth at Waltham Abbey could assist with improved delivery of social infrastructure (schools). The site proceeded and was considered strategically together with adjacent sites SR-0378, SR-0099 and SR-0104.</p>	1	7	3	7	The site did not proceed for further testing at Stage 3 of the site selection process because in 2016 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. However, although the site is not adjacent to an existing settlement, it could support the testing of Technical Assessment B, which considered whether higher levels of residential growth at Waltham Abbey could assist with improved delivery of social infrastructure (schools). The site could come forward strategically with adjacent SR-0099 and SR-0104 and should be considered further.
SR-0099	Lea Valley Nursery, Crooked Mile, Waltham Abbey	Waltham Abbey	16.66	100	Suitable	This site scored well across most criteria at Stage 2 and it was considered that it may be possible to overcome contamination and landscape constraints. It is a visible gateway site to Waltham Abbey. The site continued to proceed.	1	5	3	5	The site proceeded for further testing.
SR-0104	Land adjoining Parklands, Waltham Abbey	Waltham Abbey	4.34	150	Suitable	This site scored well across most criteria at Stage 2 and it was considered that it may be possible to overcome identified Green Belt and landscape constraints. It is close to existing town centre services. The site continued to proceed.	1	5	3	5	The site proceeded for further testing.
SR-0161-N	Pickfield Nursery, Pick Hill, Waltham Abbey, Essex, EN9 3LB	Waltham Abbey	4.22	100	Not Suitable	<p>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.</p> <p>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.</p>				N/A	The site did not proceed for further testing beyond Stage 3.
SR-0162	Land lying to the east of the Crooked Mile, adjacent to Clapgate Lane/ Eagle Gate	Waltham Abbey	18.11	533	Not Suitable	This site scored poorly against several criteria at Stage 2, including impact on Epping Forest Buffer Land, impact on Local Wildlife Sites and settlement character sensitivity. Additionally, it is in a remote location separated from the edge of Waltham Abbey. It was considered that the site relates poorly to the edge of the settlement and proposed a scale of development that would be inappropriate in this location. Therefore, it did not proceed any further.				N/A	The site did not proceed for further testing beyond Stage 3.
SR-0219	Fire Station, Sewardstone Road, Waltham Abbey, Essex, EN9 1PA	Waltham Abbey	0.65	16	Suitable	This site scored poorly at Stage 2 in terms of contamination but it was considered that it may be possible to overcome this constraint. This site is previously developed and in a sustainable location in Waltham Abbey centre. The site therefore continued to proceed.	1	1	1	1	The site proceeded for further testing.
SR-0253	Land at Woodgreen Farm, Honeypot Lane, Waltham Abbey, Essex, EN9 3SG	Waltham Abbey	0.34	5	Not Suitable	This site falls within a strategic option which was considered to be less suitable.				N/A	The site did not proceed for further testing beyond Stage 3.
SR-0331	Waltham Abbey, north-west area	Waltham Abbey	46.68	1400	Not Suitable	This site falls within a strategic option which was considered to be less suitable.				N/A	The site did not proceed for further testing beyond Stage 3.

B1.1 Overview of Assessment of Residential Sites

Appendix B1.1

Overview of Assessment of Residential Sites



Site proceeds at this stage.
Site does not proceed at this stage.
This stage is not applicable for this site.

Site Ref	Address	Parish	Tranche	Settlement (Sites proceeding to Stage 2 only)	Promoted Use	Stage 1 /Stage 6.1	Stage 6.1B	Stage 2 /Stage 6.2	Stage 3 /Stage 6.3	Stage 4 /Stage 6.4	Justification
SR-0157	Mount Pleasant House, Harlow Road, Roydon, Essex	Roydon	Tranche 1	Harlow	Residential		N/A				SR-0157 is related to adjacent site SR-0052A-N (strategic site P) which was considered by AECOM's assessment in 2016 to be unsuitable for residential development. This site was considered during Stage 6.3 of the site selection process in 2017. It falls within a strategic option which was considered to be less suitable. Refer to the strategic options justification in Appendix B1.5.2 for further details.
SR-0158A	Land at North Weald Bassett, South of Vicarage Lane	North Weald Bassett	Tranche 1	North Weald Bassett	Residential		N/A				Site is proposed for allocation. The justification for the allocation can be found in Appendix B1.6.6.
SR-0158B	Vicarage Lane/ east/west of Church Lane (east of Merlin Way), North Weald	North Weald Bassett	Tranche 1	North Weald Bassett	Residential		N/A				This site was considered to be suitable but 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. It did not proceed for further testing beyond Stage 3.
SR-0160	Fernbank Nursery, Nazeing Road, Nazeing, Essex	Nazeing	Tranche 1	Lower Nazeing	Residential		N/A				This site was considered to be suitable but 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. It did not proceed for further testing beyond Stage 3.
SR-0161-N	Pickfield Nursery, Pick Hill, Waltham Abbey, Essex, EN9 3LB	Waltham Abbey	Tranche 2	Waltham Abbey	Residential						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.
SR-0162	Land lying to the east of the Crooked Mile, adjacent to Clapgate Lane/ Eagle Gate	Waltham Abbey	Tranche 1	Waltham Abbey	Residential		N/A				This site scored poorly against several criteria at Stage 2, including impact on Epping Forest Buffer Land, impact on Local Wildlife Sites and settlement character sensitivity. Additionally, it is in a remote location separated from the edge of Waltham Abbey. It was considered that the site relates poorly to the edge of the settlement and proposed a scale of development that would be inappropriate in this location. Therefore, it did not proceed any further.

Appendix 7 – Representations 23 April 2018

23 April 2018



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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

A handwritten signature in black ink, appearing to read "Ben Thomas", followed by a long, horizontal, slightly wavy line.

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

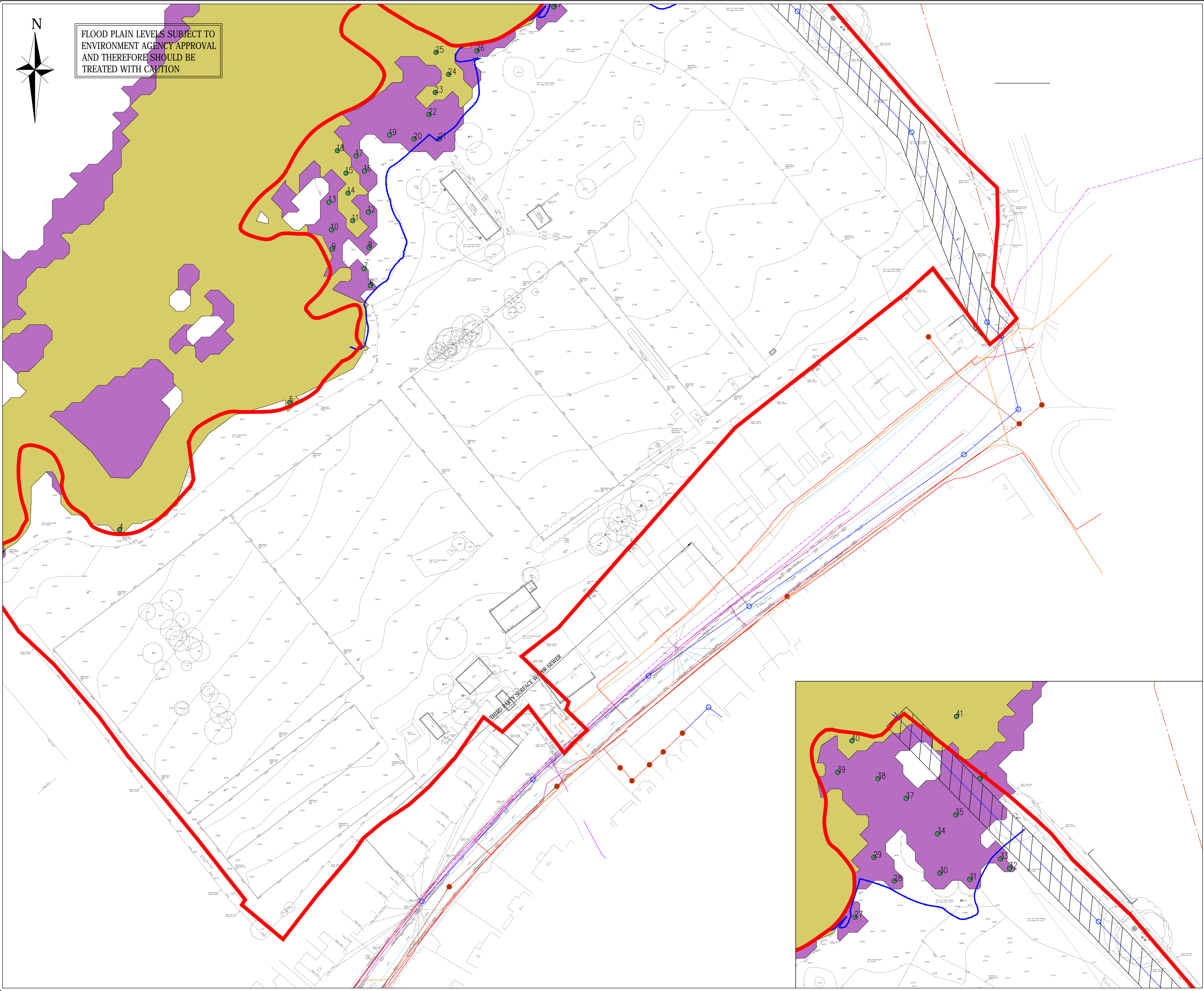
Environment Agency
Apollo Court, 2 Bishops Sq Business park, Hatfield, Herts, AL10 9EX.



Thomas Campbell
Sustainable Places Planning Advisor

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

Appendix 8 – Knollys Nursery Aerial Image



Appendix 9 – Assessment of Site Against Green Belt Functions

Green Belt Function	Savills Comments
To check the unrestricted sprawl of large built-up areas	The site is modest in size and is bound by permanent physical features in all directions. It comprises an enclosed, small-scale extension to the settlement. Defensible boundaries are created by Cobbin's Brook and its floodplain to the north-west, Pick Hill to the south, Paternoster House Care Centre to the south-west and a mature tree belt to the north-east. These features would limit the extent of development at the site and prevent development from spreading further in any direction. For this reason development of the site would not result in the unrestricted sprawl of the built up area so would not contravene purpose 1 of the Green Belt.
To prevent neighbouring towns from merging into one another	The site lies on the northern edge of Waltham Abbey which is physically separated from other towns by a vast expanse of Green Belt. Development of the site would not affect the separation gap between Waltham Abbey and other towns within the District so would not compromise purpose 2 of the Green Belt.
To assist in safeguarding the countryside from encroachment	The development of the site would be a natural extension to the existing built up area of Waltham Abbey. The context of the site is "urbanised" by the presence of residential development to the east (i.e. the Knolly's Nursery site). The potential to reinforce the screening of new development with vegetation along the site's north-west boundary, will help conserve the character of the wider countryside and reinforce a new edge to the Green Belt.
To preserve the setting and special character of historic towns	Waltham Abbey is a historic town but the site is some distance from the Conservation Areas and Historic Urban Area. The land parcel in its current form is unlikely to make a positive contribution to the setting of the historic town and is visually separated by existing development within the settlement. Therefore the site has limited relevance to purpose 4 of the Green Belt.
To assist in urban regeneration by encouraging the recycling of derelict and other urban land	The development of this site would not affect the potential of EFDC to facilitate urban regeneration through the recycling of derelict or other urban land elsewhere in the District. There is insufficient land within the existing built up areas of the District to meet housing requirements. As such Green Belt releases are necessary and the site is arguably more sustainable than other options because it was previously developed.

Appendix 10 – Pre-Application Response February

Date: 21st February 2014

Our ref: EF\2013\ENQ\01482
Your ref:



Directorate of Planning & Economic Development

Civic Offices
High Street
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Essex CM16 4BZ

Telephone: 01992 564228
DX: 40409 Epping

Mark Bedding
Crest Nicholson Eastern
One Myrte Road
Brentwood
Essex
CM14 5EG

email: ltrevillian@eppingforestdc.gov.uk

Dear Mr Bedding,

Proposal: Outline planning application for the creation of up to 90 dwellings and a community facility.

Site: Former Pickfield Nursery, Pick Hill, Waltham Abbey

Following the submission of the information received on 6th December 2013, and our meeting on 10th February 2014, I have undertaken my appraisal of the scheme and set out the issues and considerations that are relevant to the proposal.

Principle of the development:

The site is located within the Metropolitan Green Belt and consists of an overgrown open unmanaged area that was formally used for horticulture. The horticulture use has now ceased leaving the site in a poor state of disrepair that is extensively covered with broken glass and rubble.

The National Planning Policy Framework explains that the fundamental aim of Green Belt Policy is to prevent urban sprawl by keeping land permanently open and that the essential characteristics of Green Belts are their openness. One of the purposes of including land within the Green Belt is to safeguard the countryside from encroachment. The Framework explains that the construction of new buildings such as a new dwellings as inappropriate development within the Green Belt.

As such, the proposed redevelopment of this site for housing and a community facility is not recognised as an exception to inappropriate development within the Green Belt as stated in either the National Planning Policy Framework (NPPF) or the EFDC adopted Local Plan. The NPPF states that *"inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances"* and that *"when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by*

other considerations”.

You have put forward an argument with regard to the Councils housing land supply and the suitability of this site for development over others identified within the Issues and Options document. I have already given you comments produced by Ian White, and can not agree with your assessment at this stage. It is a case that will be considered during the development of the Local Plan. Lack of housing land supply, as you acknowledge, is not sufficient in itself to outweigh the harm to the green belt and you will therefore be reliant on additional factors to prove a very special circumstances argument.

Following on from the above, the provision of a community centre in the south western corner of the site forms part of the development as a whole. Although we discussed the potential community need for such a facility, if this is to form a basis for ‘very special circumstance’ then evidence will be required to justify both the need for the facility and why it can only be located within this undeveloped greenfield site. The community facility itself is inappropriate so it is difficult to use it to justify yet more development. If you intend to make this argument, a full viability assessment will be required to show that the amount of housing development is necessary to enable the community facility.

Sustainability:

As you are already aware, the issue in relation whether officers regard the proposal as being in a sustainable location is very finely balanced and you are no doubt aware that one of the reasons of refusal for a similar development at Knollys Nursery was in relation to sustainability issues. Although it is accepted that this site has more positive attributes than the proposal at Knollys, officers are still relatively uneasy regarding the possible implication of further extending the town further to the east and away from the town centre. I know these issues have been discussed within our meeting; however I would suggest that the issues regarding sustainability are closely addressed within any formal submission.

In relation to the dwellings themselves, it was noted that they would be designed to conform to the latest Code for Sustainable Homes Level 3. Although officers don’t have a concern regarding a level 3 design, it is however regarded as the bare minimum and it might be worth investigating the possibilities in providing a level 4 design under the Code for Sustainable Homes as this is another element of the sustainability argument, particularly given that the site is located within the green belt.

Affordable Housing:

Within our meeting, Zaede Gul (Housing Officer) discussed the possible requirements for the provision of affordable housing for both scenarios; whether the application goes in as a Greenbelt application or a Non-Greenbelt application (should the site emerge as an allocated site within the Local Plan, which as you know is yet to be determined). I believe that Zaede has passed on this information however for your convenience please find the required provisions for each scenario set out below:

Greenbelt Site		Non-Greenbelt Site	
Proposed units in total =	90 Units	Proposed units in total =	90 Units
Affordable Housing requirement = 80%	= 72 units	Affordable Housing requirement = 40%	= 36 units
Of which, Affordable Rented = 60%	= 43 units	Of which, Affordable Rented = 70%	= 25 units
And Shared Ownership = 40%	= 29 units	And Shared Ownership = 30%	= 11 units
Private Units = (16%)	= 18 units	Private Units = (49%)	= 54 units

It is noted that from your submission that it is proposed to provide 40% affordable housing on site. As stated within our meeting, if only 40% affordable housing is provided then this would not be considered a 'very special circumstance' to outweigh the harm to the Green Belt.

If you wish to offer more on-site affordable housing than the required 40% in order for this to form part of your very special circumstance argument, then you should note that the Council's adopted Housing Strategy expects no less than 80% affordable housing on Green Belt Sites as stated above. This is reflected in the majority of recent housing proposals within the Green Belt where between 80% and 100% affordable housing is normally put forward. Whilst the provision of 80% - 100% affordable housing can contribute towards 'very special circumstances', it is unlikely that this factor alone would be sufficient to outweigh the harm to the Green Belt.

If you are intending to add affordable housing to your very special circumstances argument then you will need to justify why less than 80% is still very special, via the submission of a viability assessment. The Council would then appoint a consultant to validate this and you would need to meet the cost of this external assessment. From past experience this is usually within the region of £3,500 + VAT. Alternatively, if you do not wish to undertake your own assessment then we can appoint an independent consultant to assess the viability of the scheme on your behalf, again at your cost.

In terms of the housing mix itself, you stated that the proposal as a whole would most likely consist of:

17% containing 4 bedrooms
62% containing 3 bedrooms
21% containing 2 bedrooms

The housing mix appears to be appropriate in providing a variety of different housing types although it was noted that no affordable housing was proposed for any of the 4 bedroom dwellings. Usually the affordable dwelling mix would be expected to reflect the mix of the market housing. It was also suggested that some 1 bedroom units could be included.

Design/Layout

The design and layout of the proposed development should follow the guidance contained within the Essex Design Guide, however there would be no objection to a more modern design being incorporated for the buildings. Both the NPPF and the Local Plan support good design that complements and enhances existing areas, and the NPPF states that "*great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area*".

As it is most likely that the application is for outline only, as indicated within our meeting, officers comments are based on the siting and layout of the proposal. Other issues such as the design and appearance of the development would be assessed under a reserved matters application if outline permission for the development is granted.

Although discussions are only centered on an indicative site plan at this stage as the proposal could be subject to a few minor amendments before the formal application is received, officers are generally happy with the siting and layout of the development as a whole and the proposed density appears appropriate and capable of being achieved whilst maintain an adequate buffer zone.

Some minor concerns in terms of expected garden sizes, acceptable overlooking distances and provision for public open spaces were raised within our meeting however these issues were considered to be easily overcome as you mentioned. For your information set standards in relation to the above can be found in the Adopted Local Plan and the Essex Design Guide.

With regards to 'Secured by Design', there is no objection in principle to the development, however issues regarding layout, permeability, youth play provision and any local crime generators will need to be addressed at the more detailed stage.

Flood Risk:

The northern boundary of the site is bounded by a Cobbins Brook. Any works within 8m of these watercourses will require Land Drainage Consent. Irrespective of this, a minimum 8m buffer zone should be maintained from these watercourses and environmental enhancements should be incorporated as necessary.

As the site is over a hectare in size a site specific flood risk assessment (FRA) will need to be submitted with the application. This FRA will need to focus on how Sustainable Drainage Systems (SuDS) are to be maximised to achieve greenfield runoff rates. In particular the FRA should demonstrate that:

- Surface water runoff is balanced to the Greenfield run off rate for all events up to and including the 1 in 100 chance in any year storm, taking the effects of climate change into account;
- Storage is provided to attenuate the 1 in 100 chance in any year storm event, taking the effects of climate change into account.

It appears that the northern part of the site adjacent the brook is located within Flood Zones 2 and 3, however you stated that an independent 3D modelling exercise of the site indicates that the built form of the development would lie outside these Flood Zones. Provided this is agreed by the Environment Agency and no part flood zones 2 and 3 are proposed for development, then no Sequential Test will be required. However if any development is proposed within Flood Zone 2 then a Sequential and Exceptions Test would be required for the scheme.

The development site is located within a highly water-stressed area and therefore the use of water efficiency measures is encouraged. Residential development should seek to achieve 105 litres/per/day and can be done by taking advantage of water efficient technologies such as low-flow taps, dual flush toilets, and water butts in gardens.

Landscape/Nature conservation

The application was referred to Council's trees and landscape officer to provide any initial comments regarding the proposal. 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 Environmental 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 therefore requested that if a detailed application is submitted, a landscape strategy for the site be provided, in particular the area near the river. Additionally, a detailed landscape scheme at application stage would be welcomed.

Furthermore, which I forgot to mention within our meeting, the Council's Countryside officer has requested that a Phase 1 Habitat survey be submitted with any future application specifically relating to bats, breeding birds, great crested newts and reptiles.

Highways:

As mentioned within our meeting I had not received any formal comments back from Essex County Council's highways officer in relation to the proposal. Since our meeting the highways officer made the following comments:

- A Transport Assessment shall be required to be submitted with a planning application for this scale of development, with the scope having been previously agreed with ECC the Highway Authority.
- A safe and suitable access should be provided with appropriate visibility and geometry in line with current standards to be agreed with ECC.
- Improvements to pedestrian facilities within the area – a pedestrian crossing will only be considered by ECC if it can be demonstrated that there is a necessary demand for it through the use of an assessment methodology with PV².
- Improvements to the bus stops on Paternoster Hill primarily in the form of Real Time Passenger Information provision at the two existing stops, with the possibility of a shelter at the east bound stop.
- A residential travel plan and monitoring fee will be required by ECC and approved by ECC's Travel Planning Team, this will also include the residential travel packs.
- The internal roads shall ideally be constructed at a minimum width of 5.5m throughout the site with appropriate turning heads as necessary.
- The parking shall accord with the current Parking Standards Sept 2009 in bay sizes, garage sizes and amount – no allocated parking shall be sited within the adoptable highway.

Education provision

The Infrastructure Planning Officer for Essex County Council is of the opinion that new provisions for Early Years & Childcare Places would be needed to serve a development containing of up to 90 new dwelling houses. On the data currently available there is likely to be sufficient places at secondary level but there is unlikely to be sufficient primary and early years and childcare places. As such, a financial contribution would be anticipated to address this under a Section 106 Agreement. For information purposes only, should the development result in 90 dwelling houses with 2 or more bedrooms the contribution for primary places would be £281,502 and for early years and childcare places £96,107 making a total contribution of £377,609. These sums are based on costs as at April 2013 and would be index linked from this date using the PUBSEC index.

Contaminated Land

Due to its former use as a Horticultural Nursery and the potential for peat beds to be present in the underlying geology, there is the potential for contaminants to be present on site.

As domestic housing is considered to be a vulnerable use with particularly sensitive child receptors land contamination investigations will need to take place. Although a Phase 1 Contaminated Land Assessment Report could be submitted to identify any potential contaminants on site with the application, this could also be dealt with by way of a conditional approval.

Other Issues:

We discussed at the meeting the alternative option of promoting the site with our Planning Policy section for future re-designation and potential removal from the Green Belt. This issue is not assessed as part of this pre-application submission, however for further information on this process please contact our Forward Planning Team on 01992 564517 or at contactfp@eppingforestdc.gov.uk.

I can confirm however that as suspected the timetable for the draft preferred options to be completed has slipped and the best estimate is currently that this document will not be available for public consultation before late summer.

Conclusion

In light of the above, the principle of the proposed development at this stage would likely be considered acceptable only if sufficient very special circumstances can be put forward to clearly outweigh the significant harm to the openness of the green belt that would result. You have put forward a case which in officers views, is still weighted against the development in Policy terms and the advice would be to wait to see whether the site emerges as a preferred site in the Local Plan process. However 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.

With the current emphasis on localism, an important factor will be the responses from local residents and interest groups which may help tip the balance either in favour or move against the scheme and we will not know this until full public consultation has been carried out when an application is submitted.

Should you wish to submit an application of this nature, the following documentation should be provided:

- Application forms, plans and covering letter;
- Design & Access Statement;
- Planning Statement;
- Statement of Community Engagement;
- Transport Assessment;
- Parking provision analysis
- Flood Risk Assessment;
- Ecological Survey;
- Land Contaminated Assessment;
- Arboricultural Survey;
- Landscape Impact Assessment and Landscape Strategy
- Draft Heads of Terms.
- Affordable Housing Statement
- Viability Statement

Other documentation and/or plans may also be helpful (such as artists impressions of any indicative scheme) however may not be required to register the application. Furthermore, further documentation may be considered necessary at validation stage depending on the details of the application received. For a full explanation of these requirements, please see the validation check list on our website.

I hope the above comments are of assistance, however please note that these views are purely Officer opinion and are given without prejudice to the final decision of the Council on any planning application received. If you wish to discuss any further schemes, and an additional meeting is requested or further research is needed, we usually charge at a rate of £80 per hour. Please contact me should you need to discuss these matters further.

Yours sincerely

Lindsay Trevillian
Planning Officer