

## **Introduction**

This short statement has been prepared by Phase 2 Planning & Development on behalf of Mrs Louise Barr, the owner of allocation site WAL.R2 to the north of Waltham Abbey, and also on behalf of Manor Oak Homes, who are promoting allocation sites WAL.R1 and WAL.R3 on behalf of those landowners.

Together, Mrs Barr and Manor Oak Homes therefore control the land which will be covered by the Waltham Abbey North Masterplan. Mrs Barr and Manor Oak Homes are currently in the process of agreeing a Planning Performance Agreement with Epping Forest District Council with a view to jointly progressing that Masterplan.

## **The Waltham Abbey North Masterplan Area – Background Matters**

### A sustainable location

The Inspector will be aware that the Waltham Abbey North Masterplan area lies immediately to the north of the existing urban area.

The centre of the site lies roughly equidistant to Waltham Abbey Town Centre (around 850m to the south-west) and the King Harold Academy (around 700 to the south-east), whilst the Waltham Holy Cross Primary School lies to the immediate south. Both Parklands and Crooked Mile are strategic bus routes offering easy access to Waltham Cross (with its railway station) and other local destinations. The site therefore is in a highly sustainable location offering access by non-car modes and is within walking distance of a range of local facilities (the plan at Appendix 1 is based on the WAL.R2 site but the principles can be seen to apply to the wider Masterplan area).

### Previously developed land

The western part of the Masterplan site (WAL.R2) includes substantial areas of previously developed land, in the form of former garden centre buildings and associated hardstanding to the Crooked Mile frontage, and a range of other structures, including three large redundant barns that were the subject of a previous permission for B8 storage use. The allocation of the site therefore helps to meet national planning policy in respect of prioritising the use of previously developed land.

### Drainage

All of the Masterplan area falls within Flood Zone 1, the most sequentially preferable category of land in terms of flood risk.

Surface water flows connected with overland drainage routes can be addressed through the normal process of undertaking a site specific Flood Risk and Drainage Strategy, which will set out the means by which surface water flows will be attenuated, whether arising from the new development or existing conditions.

The accompanying short technical note by Cannon Consulting Engineers (Appendix 2) sets out the existing situation regarding surface water flows and explains how this can be addressed either by designing to avoid areas of current surface water accumulation, or by introducing sustainable urban drainage systems that help to alter the current drainage pattern and allow better management of

existing surface water. Management of surface water in this way through SuDS is now common practice and ensures that there is no increased risk of flooding beyond the site boundary.

#### Footpaths and Walking

There is an existing public footpath (PROW 211-11) that crosses the site, and which connects to a network of off-site footpaths and bridleways providing walking routes in the adjoining countryside to the north and east. Routes available include a circular walk around Breaches Farm to the north-east (2.8km from the centre of the site), and around Kennel Wood (4km), as well as longer routes. The perimeter of the allocated Masterplan area measures 2.9km, allowing potentially for a circular on-site walk of around 2.7km.

The site is also within 600m of the Lea Valley Regional Park (via the Cornhill Meadows entrance from Crooked Mile), which has 26 miles of trails and 30 walking routes, as well as a range of other activities and sporting facilities. The Lea Valley Regional Park Authority actively encourages additional visits to the site via its website [www.visitleevalley.org.uk](http://www.visitleevalley.org.uk).

The site is well placed therefore to offer opportunities for local informal recreation and walking.

#### Utilities

All major utilities and services are available in the adjoining roads at Parklands and Crooked Mile. No major utility routes cross the site.

#### Vehicular Access

Both promoters have appointed highway consultants to determine the most appropriate means of safe vehicular access and egress from the site. The work undertaken confirms that suitable points of access can be secured from both Crooked Mile and Parklands.

#### **Response to the Inspector's Matter 15/Policy P3 Questions**

##### Can the M25, particularly Junction 26, accommodate the level of growth proposed at Waltham Abbey?

As noted in the Statement of Common Ground entered in to between the promoters and the Council, the promoters do not object to making a proportionate financial contribution to the works identified in the IDP for improving Junction 26 of the M25.

At this stage, the transportation modelling being undertaken for the promoters suggests the impact at Junction 26 would in fact be minimal, but that is a matter to be addressed in due course at the application stage. For the purposes of the Local Plan, the Council has identified mitigation to address the concerns raised and identified means by which this could be funded.

##### Is the relationship between Waltham Abbey and the Lee Valley Regional Park adequately reflected within Policy P3 and the accompanying allocations?

We offer no specific comment on the LVRPA representations, other than to note as per our comment above that the Regional Park can be accessed via Crooked Mile.

Should the vision for Waltham Abbey offer more support for smaller industrial and commercial sites to provide local employment opportunities?

This matter was covered in our original Regulation 19 representation on behalf of Mrs Barr and we do not consider it necessary to expand upon that.

Is it justified to refer specifically to the expansion of two primary schools in Part F, or should the requirement be more flexible?

We attach at Appendix 3 a short technical note on education facilities and capacity in the Waltham Abbey area, undertaken by EFM, a specialist education consultant. This note confirms that there is currently significant spare capacity in primary education facilities, but notes that, with growth, it is likely that an additional 0.5 to 1 FE will be required. This can be delivered by the expansion of either one or more existing schools, and hence the specific reference to two primary schools is not justified.

We note that in the Statement of Common Ground entered in to between Essex County Council and Epping Forest District Council (see ED10A), essentially the same conclusion is reached and the Council therefore proposed to modify the Plan accordingly, which we support.

What is the justification for Part G concerning the relocation and expansion of a local secondary school?

There is no justification for this.

The education technical note attached at Appendix 3 shows that there is considerable spare capacity in the Waltham Abbey area such that we consider there is unlikely to be a requirement for any expansion arising from the proposed development, let alone a case for relocation of the existing facility.

We note that in the Statement of Common Ground entered in to between Essex County Council and Epping Forest District Council, ECC appear to agree to remove their objection to this aspect of the policy on the basis that it is a “local aspiration” (see representation 52 on pages 3 and 4 of ED10B).

An ‘aspiration’ that has no basis of substance and no realistic prospect of being achieved should not be included in the Local Plan. Moreover, the suggested wording from ECC in that SoCG confirms that the Education Authority has determined that it is already making provision for either a 1FE or 2FE expansion to the King Harold Academy on its existing site to accommodate any additional need arising.

Waltham Abbey North Masterplan Area: Is part N(vi) intended to preclude vehicular access from Parklands?

We assume this is not the intention, because Parklands can provide at least two satisfactory points of access into the Masterplan Area, which will assist in providing connectivity to the existing built up area of the town.

WAL.E6 (Galley Hill Road Industrial Estate): Is it intended that this site should be allocated only for B2/B8 uses as suggested in paragraph 5.53, or for all the B Class uses as suggested in Part D of the policy? Would it be justified to allocate the site to include sui generis uses in view of the existing range of uses upon it?

The existing industrial estate contains a wide range of B Class Uses, and some sui generis uses (e.g. scaffolding merchants), which have the benefit of existing permissions. We do not see any justification in principle for restricting employment uses on the extended area (or replacement uses on the existing consented area) to B2/B8 uses only.

What effect would the development of the following sites have on the purposes of the Green Belt: WAL.E5-E6; WAL.R1-R3 & R6; and T1?

Dealing firstly with WAL.R1-R3/T1 (the Waltham Abbey North Masterplan area), there is an existing 'ribbon' of development that stretches northwards from the main built up area along Crooked Mile on the western side of the proposed allocation, and on the eastern side, there are existing commercial uses on both sides of Galley Hill Road, which similarly stretch northwards up to and including Abbey View Produce/Galley Hill Industrial Estate. The proposed site of the Waltham Abbey North Masterplan is substantially 'contained' to the west and east by these pockets of existing urbanisation that stretch northwards from Parklands.

In terms of Green Belt purposes, the proposed allocation would not result in 'unrestricted' sprawl, because of the potential to contain the new development within a well-defined landscaped boundary, and because the development would be substantially contained within the extent of the existing northward projection of urban land uses alongside Crooked Mile and Galley Hill Road, as described above.

In terms of protecting neighbouring towns from merging, the allocation area does not materially diminish separation between Waltham Abbey and any neighbouring settlement.

In terms of protecting the countryside from encroachment, the proposed allocation will result in the loss of some existing agricultural land, but the extent of that is lessened by the fact that the allocation also includes significant areas of previously developed land on the western side of the site.

With regard to the fourth purpose, the proposed development in this location would not adversely affect the historic core of Waltham Abbey, or materially erode its wider countryside setting.

With regard to the fifth purpose, the use of land in the Green Belt to meet local housing needs is not being undertaken in the alternative to pursuing urban redevelopment, but is required in addition to reusing urban land.

For these reasons, the removal of the proposed allocation would not have a significant effect on the wider strategic purposes of the Green Belt around Waltham Abbey.

In respect of site WAL.E6, that site is already substantially developed and therefore contributes little to the openness of the Green Belt, and the small area of additional undeveloped land to the north of the existing Galley Hill Yard industrial estate falls within a substantially developed frontage to both

sides of Galley Hill Road, which means that overall, the site of WAL.E6 contributes little or nothing to the wider purposes of the Green Belt.

#### **Other Matters – Galley Hill Road and Crooked Mile.**

Finally, the Statement of Common Ground between the promoters and the Council identifies a difference of view between the Council and Manor Oak Homes regarding the necessity or otherwise for the provision of a vehicular access on to Galley Hill Road, referred to in Part N(vi) of Policy P3.

Manor Oak Homes consider that, as the proposed Masterplan area can be appropriately served from Crooked Mile and Parklands, there is no necessity for an additional vehicular access on to Galley Hill Road.

In addition, the site promoters do not agree that there is any need to upgrade/widen Galley Hill Road in connection with the proposed development, regardless of whether or not there is a vehicular link to it (as referred to in Part N(vii) of Policy P3). This is because Galley Hill Road is a 'no through road', so the only traffic that uses Galley Hill Road originates from that road itself. This means that (a) if there is no vehicular link from the Masterplan area to Galley Hill Road, there would obviously be no change to existing traffic flows on Galley Hill Road, but also (b) if there were a vehicular link from the Masterplan area to Galley Hill Road, it would simply mean that some existing traffic that uses the southern end of Galley Hill Road for access would be provided with an alternative route that would by-pass that section.

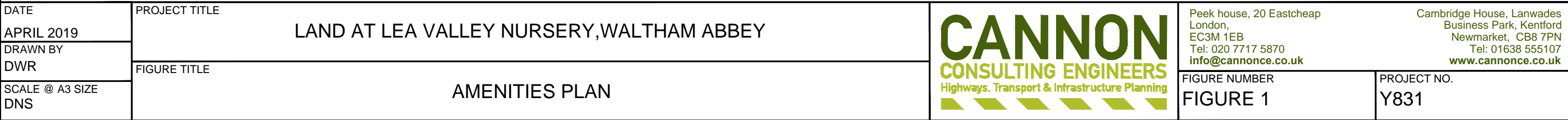
Hence the only effects of the development on traffic conditions on Galley Hill Road would be either neutral or, in relation to the southern section, a reduction in trips.

Finally, previous work undertaken by the highway consultants appointed in respect of WAL.R2 identified no requirement for upgrading/widening Crooked Mile in order to serve the development.

#### **Conclusion**

As noted in the Statement of Common Ground, and notwithstanding the matters of detail raised in this Statement, the landowners/promoters are working proactively with the District Council to bring the proposed North Waltham Abbey allocation forward, and there is no reason why the site cannot be brought forward for delivery early in the Plan period.

## **APPENDIX 1**



NOTE THE PROPERTY OF THIS DRAWING AND DESIGN IS VESTED IN CANNON CONSULTING ENGINEERS AND MUST NOT BE COPIED OR REPRODUCED IN ANY WAY WITHOUT THEIR WRITTEN CONSENT

## **APPENDIX 2**



**Y831 - Waltham Abbey North Masterplan, Essex**  
**Flood Risk and Surface Water Management Note**  
**April 2019**

**Introduction and Context**

This note has been prepared on behalf of Phase 2 Planning to consider flood risk and surface water matters associated with the Local Plan promotion of land at Lea Valley Nursery which forms part of the 'Waltham Abbey North Masterplan'.

The Waltham Abbey North Masterplan area (the 'site') covers three allocated sites for residential development: WAL.R1 Land west of Galley Hill Road; WAL.R2 Lea Valley Nursery, Crooked Mile; WAL.R3 Land adjoining Parklands; and one site allocated for Traveller Accommodation, WAL.T1 Land to the rear of Lea Valley Nursery.

The site extends to approximately 32 ha and consists of agricultural land and a former glasshouse site. The topography of the site and local area generally falls from the north/north-east to south/south-west.

The sources of flooding considered within this note are those defined by the Flood and Water Management Act 2010 (FWMA).

This note draws on information obtained from the following sources:

- 'Gov.uk' Long term flood risk information mapping;
- Thames Water (TW) asset plans;
- British Geological Survey (BGS) records; and
- Epping Forest District Council Strategic Flood Risk Assessment (SFRA) Level 1 update (dated August 2015).

**Sources of Flooding**

Flood mapping shows the site lies in Flood Zone 1 (the low probability flood area) and therefore the site is not considered to be at a significant risk of flooding from a river or notable watercourse.

The nearest main rivers are the Cornmill Stream (part of the Lea Valley complex of watercourses) approximately 480 m to the west and the Cobbin's Brook some 490 m to the east. Each of these channels has an associated floodplain but neither extends as far as the site. An extract of the Flood Map for Planning is provided at Figure 1 (overleaf).



Figure 1: Extract of the Flood Map for Planning

There are a number of drainage channels/ordinary watercourses crossing the site. These are shown on Ordnance Survey (OS) mapping and were observed during a site visit. These channels will accept rural flows from the land predominantly to the north of the site, and potentially some urban flows from the east.

BGS mapping for the area shows that the site and surrounding area is underlain by London Clay with no superficial deposits being recorded in the area of the site itself. The impermeable geology of the area means that the site is potentially liable to experience rural sheet flow shed from the higher land to the north of the site. The impermeable geology also means that groundwater flooding is not considered to be an issue for the site.

Figures 2 and 3 (overleaf) show extracts of the high and medium risk surface water flood mapping within the site. The flood risk extents are largely associated with the drainage channels/ordinary watercourses crossing the site. Through the application of a sequential approach to planning and development, the proposed dwellings should be directed away from these flood risk areas.

The Epping District Council (EDC) SFRA mapping shows the site is located in an EDC Flood Risk Assessment Zone. In line with the wording of draft policy DM 15 Managing and Reducing Flood Risk, specifically part E, a Flood Risk Assessment will be undertaken at the later planning stages to support the planning application.



Figure 2: Extract of the surface water flood map – (High Risk – Depth)



Figure 3: Extract of the surface water flood map – (Medium Risk – Depth)

The site is not considered to be liable to flooding from surface water sewers as the TW surface water sewers in the area are downslope of the site.

The site does not lie in a reservoir inundation zone (an area which would flood as a result of a breach (failure) of a reservoir embankment) and there are no canals in the area, therefore there is no associated flood risk from these sources.

## Flood Management

The surface water flood risk constraint could be respected through appropriate masterplanning with a layout that avoids built development in the high and medium risk flood areas, whilst allowing for overland flood routing to be maintained for the low risk areas.



An alternative approach would be to undertake a modelling exercise to better quantify the constraint imposed by the surface water flooding, and to understand the options for reworking the flood extent to maximise the development opportunity. This would normally be undertaken at the application stage.

Management of any surface water flows from the off-site land to the north could readily be achieved by a cut off channel/swale running along the northern site boundary and around the site. Provision of a swale or similar at the boundary would intercept any potential overland flows and also attenuate flows to slow the rate at which they enter the current downstream network.

### **Surface Water Management**

The impermeable geology beneath the site means that a controlled surface water discharge to the existing drainage channels/ordinary watercourses passing through the site will be pursued as the most appropriate solution.

Developing the site will provide opportunities to reduce current runoff rates from the site by restricting the post development discharge rate to a lower probability greenfield rate. For example restricting the outfall/s from the developed site to the fixed annual greenfield rate (Q1) would result in lower runoff rates from the site during more extreme storms.

On-site storage will be sized to manage a storm with a 1 in 100 annual probability plus a 40 % increase to allow for climate change.



## Summary

The site is not considered to be at a significant or unmanageable risk of flooding from the various sources of flooding identified in the Flood and Water Management Act (FWMA) 2010.

The nature and extent of the surface water flooding is such that this could be catered for within the development layout. Alternatively, development proposals and flood mitigation measures within the risk area could be tested through a later stage quantitative modelling exercise. Whatever approach is taken does not prejudice the delivery of development at Waltham Abbey North, nor does it create any 'showstoppers' for an allocated site going through the planning application process.

Sufficient land is available to provide the required on-site attenuation to manage up to and including the 1 in 100 annual probability storm event inclusive of 40 % climate change allowance. The attenuation will be provided as part of an overall Sustainable Drainage System (SuDS) which will be developed as part of a later planning application submission.

## **APPENDIX 3**

**Epping Forest District**

**Proposed Development at  
Waltham Abbey North**

**Review of Education Requirements**

**for**

**Manor Oak Homes**

**April 2019**

**Jan Kinsman**



## **1 Introduction**

- 1.1 Residential Development at Waltham Abbey is proposed in the Epping Forest District Local Plan Submission Version 2017, which is currently the subject of an independent Examination. Policy SP2 sets out the proposed distribution of new housing, including approximately 858 dwellings at Waltham Abbey. A number of sites are proposed for development at Waltham Abbey, with the majority of new housing proposed in the Waltham Abbey North Masterplan Area.
- 1.2 The Waltham Abbey Masterplan Area includes sites WAL.R1, WAL.R2 and WAL.R3. Draft Policy P3 B indicates dwelling numbers on these sites as 295, 315 and 130 respectively – giving a total of 740. Draft Policy P3 N (i) specifies a minimum of 610 homes in the Masterplan Area.
- 1.3 Draft Policy P3 F (i) states that the proposed development at Waltham Abbey *“will be expected to contribute proportionately”* towards infrastructure including *“Expansion of two primary schools in within the Waltham Abbey Forecast Planning Group”*. Draft Policy P3 G states, *“The Council will seek the potential relocation and expansion of a secondary school in the local area in order to meet future needs arising from development.”* Draft Policy P3 N (v) references *“expansion of a secondary school “in the local area”*.
- 1.4 Essex County Council has responsibility for ensuring sufficient school places are available to meet the needs of residents in Epping Forest District. The County Council publishes various information about schools, pupil numbers and pupil forecasts, and some of its publications are included in the evidence base for the local plan.
- 1.5 EFM has been appointed by Manor Oak Homes to review the position on school capacities and advise on the draft policy requirements, in the context of the residential development proposed at Waltham Abbey - in which it has in interest.
- 1.6 For the purposes of this report it is assumed that all of the development proposed for Waltham Abbey will come forward in the plan period.

## **2 Primary Education Provision**

- 2.1 The Waltham Abbey Primary Education Forecast Planning Group comprises High Beech CE Primary, Hillhouse CE Primary, Leverton Primary, Upshire Primary, Waltham Holy Cross Primary School. Four of these schools are in the Waltham Abbey area, and High Beech CE Primary is in High Beech – in the rural area between Waltham Abbey and Loughton.
- 2.2 High Beech CE Primary is not really relevant to the situation in Waltham Abbey. However, its inclusion in the figures is unlikely to create any difficulties as it is a small school, with capacity for 105 pupils and 100 pupils

on roll in October 2018, and no new housing is proposed in the area of the school.

- 2.3 The schools in Waltham Abbey are larger, with capacity to cater for between 210 and 630 pupils. As of October 2018, these schools had some capacity available in all year groups except Year 1, the cohort admitted in September 2017. The September 2017 admission was a very big year group and an additional intake class was admitted at Upshire Primary.
- 2.4 The County Council's most recent forecasts of demand, which include the number of pupils expected as a result of new housing, indicate that the primary schools in Waltham Abbey will have sufficient intake capacity to accommodate demand through to 2024/25 with the exception of 2021/22 - when a small shortfall is expected. From 2025/26 onwards the forecasts indicate additional capacity will be needed, as the impact of new housing is increasingly felt. The final forecast year provided is 2028/29 for which a shortfall of 16 places is shown. This equates to about half a form of entry – a form of entry being 30 pupils per year group.
- 2.5 The housing delivery trajectory for Waltham Abbey contained in the Local Plan Submission Version indicates new housing being brought forward from 2021/22 onwards, with most being completed before 2028/29 (65 of 858 remaining).
- 2.6 Using the County Council's established pupil product formula for houses with two or more bedrooms, the expected demand from 858 dwellings is 257 primary pupils. This is just over one form of entry.
- 2.7 Considering both the pupil forecasts (which suggest that without new housing some capacity would be available in schools) and the expected pupil numbers from the proposed housing, it is likely that between half and one form of entry of additional primary education provision will need to be provided in Waltham Abbey primary schools to support planned housing growth. Depending on the scale of additional provision, this could involve expanding one or two schools. Creation of a new school is not a favoured option if expansion of existing schools is possible.
- 2.8 The County Council's document, 10 Year Plan - Meeting the demand for school places in Essex 2019-2028, identifies the need for a bulge class in 2021/22 and a one form entry expansion in 2025/26, which reflects its pupil forecasts described at paragraph 2.4 above – although it is not clear whether a full form of entry will be required for 2025/26 onwards.
- 2.9 The County Council's response to the Local Plan Submission Version noted that replacement of temporary accommodation at Leverton School is required, and suggested that reference to a particular number of primary schools should be removed from the policy - I would agree with this

suggestion on the basis that the policy is unduly prescriptive and the adding extra capacity may not involve two schools.

- 2.10 The County Council accepts the principle of expanding existing schools as the approach to be taken in Waltham Abbey.

### **3 Secondary Education Provision**

- 3.1 King Harold Business & Enterprise Academy is the only secondary school in Waltham Abbey. In terms of references in Draft Policy P3, this has to be the secondary school *"in the local area"*. The County Council considers it in a secondary education planning group with one other school, Epping St Johns Church of England School, which is over four miles away - in Epping.
- 3.2 King Harold Business & Enterprise Academy has an admission number of 180, which means it can admit up to that number of pupils each year. It does not have a sixth form, so has capacity for 900 pupils (5 x 180). As of October 2018 the school had 580 pupils on roll, and 320 surplus places.
- 3.3 Epping St Johns Church of England School also has an admission number of 180. Its capacity is higher, 1020 places, as it has a sixth form. This school had 936 pupils on roll in October 2018, and 84 surplus places.
- 3.4 The County Council's 10 Year Plan identifies the need for a two form entry expansion in 2022/23 and a new six form entry secondary school in 2026/27. The latter (at least) is the result of the fact that the Latton Priory development on the fringe of Harlow is within the secondary planning area for these two secondary schools. The location for the two form entry expansion is to be confirmed.
- 3.5 Using the County Council's established pupil product formula for houses with two or more bedrooms, the expected demand from the 858 dwellings proposed for Waltham Abbey is 172 secondary school pupils, including sixth formers. The amount of housing proposed for Epping in the Submission Version is 1,305 dwellings, which equates to 261 pupils.
- 3.6 The following facts can be drawn from the above information:
- There is currently more than enough spare secondary school capacity at King Harold Business & Enterprise Academy to accommodate all of the new housing proposed in Waltham Abbey.
  - There is insufficient capacity at Epping St Johns Church of England School to accommodate all of the new housing proposed in Epping, by a considerable margin.
- 3.7 In view of these findings, any suggestion that expansion of secondary education capacity is required to support development in Waltham Abbey is unjustified, and should be reconsidered.

- 3.8 No background, reasoning or evidence is provided to explain Draft Policy P3 G, which refers to relocation and expansion of a “*secondary school in the local area*” - which must mean King Harold Business & Enterprise Academy - “*in order to meet future needs arising from development*”. The above information demonstrates that no expansion is required to meet future needs arising from development in Waltham Abbey.
- 3.9 Furthermore, even if additional provision were required, the cost involved in re-providing existing capacity would make such a project very costly. I am not aware of any evidence that suggests the existing school buildings are unsuitable or unfit for purpose.
- 3.10 It is my view that sub-sections G and N(v) of Draft Policy P3 should be deleted.
- 3.11 The County Council’s response to the Submission Version confirmed that it was unaware of any proposals for the relocation and expansion of King Harold Business & Enterprise Academy; and suggested the wording in Draft Policy P3 G should be deleted in the absence of detailed evidence.

#### **4 Conclusions**

- Provision of additional primary education capacity will be necessary to support proposed housing growth at Waltham Abbey, and can be delivered by expanding one or more existing schools. The reference in Draft Policy P3 F (i) to two primary schools is unduly prescriptive and should be reworded to read, “*Expansion of one or more existing primary schools in Waltham Abbey;*”.
- The existing secondary school in Waltham Abbey has surplus capacity to support the proposed housing growth at Waltham Abbey. There is no evidence to support relocation of a secondary school in the local area, and Draft Policy P3 G should consequently be deleted. Likewise, Draft Policy P3 N (v), which suggests provision for expansion of the school should be included in the Strategic Masterplan for Waltham Abbey North should also be deleted.