

Jane R Orsborn BA Hons; Dip TP; MRTPI; DMS

Chartered Town Planner

*“Laurels”
121 Queen’s Road
HERTFORD
SG13 8BJ*

jrorsborn@btconnect.com

Telephone 01992 551324

EPPING FOREST LOCAL PLAN

EXAMINATION HEARING STATEMENT

MATTER 15 ISSUE 2

Policy P10 NAZEING

on behalf of

“NAZEING NURSERIES”

ID 19 LAD 0027, 0028 and 0031

April 2019

Context

- 1.1 This submission responds to the Inspector's Q6 under P10 Nazeing - whether regard has been paid to previously developed nursery sites in the Green Belt before greenfield sites in accordance with Policy SP2. It is submitted on behalf of the owners of three nurseries located to the west of North Street, Nazeing, as defined on the plan attached at Appendix LN/001, namely:-
East Side Nursery, ref 19 LAD 0028 - Mr D Fawcett
Lakeside Nursery, ref 19 LAD 0027 - Mr & Mrs Masucci and Woodhouse PC Ltd and
Lake Road Nursey, ref 19 LAD 0031- Mr V Lanza.
An aerial photograph is attached as Appendix LN/005.
- 1.2 I have participated in the plan making process on behalf of the owners of Lakeside Nursery from the outset, submitting their land through "Call for Sites". Lakeside is reference SR-0152. There has been no form of horticultural activity at Lakeside since the latter 1980's following which a variety of commercial uses have been established on an area of 0.4ha at the western end of the site. That area is indisputably "previously developed". The open area which abuts the rear gardens of houses in North Street is the subject of an extant planning application (EPF/1605/18) for the erection of five detached dwellings, determination of which has been delayed pending resolution of issues with Natural England in respect of mitigating air quality on Epping Forest SAC. It has been agreed that the site qualifies as "infilling" within the village and therefore represents appropriate development in accordance with paragraph 145 clause e) of the NPPF. The area concerned is approximately that to the east of the grey dashed line on LN/001. Permission (EPF/1604/18) was granted in September 2018 for improvements to the private access road and creation of a landscaped bund at the eastern end of the commercial yard. This work has yet to be undertaken.
- 1.3 Page B15 of Appendix B1.1 to Arup's Site selection Report (EB805A) states that Lakeside Nursery *"was considered to be suitable (for residential development) 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"*. Having regard to the wording of policy SP2 I do not understand this explanation.
- 1.4 I submitted representations in respect of East Side and Lake Road Nurseries to the Regulation 19 consultation, following a decision by all of the owners to promote their land jointly to provide for comprehensive redevelopment. Whilst these currently remain in horticultural use their owners see no medium term future given the small size of each site and the constrained accesses in terms of HGVs. They will most probably become available for redevelopment during the lifetime of the Plan. Collectively with Lakeside Nursery this land is site ref. SR-0427. It attracted exactly the same "justification" for non-allocation in Appendix B1.1 (pp B34) as Lakeside Nursery.

1.5 A detailed description of the three individual elements comprising “Nazeing Nurseries” is provided in Section 4 of my submission to the Regulation 19 consultation.

1.6 I attended the hearing session which took place on 25th February 2019 into Matter 4 Issue 2 in respect of the Settlement Hierarchy and Issue 3 Distribution of Employment in the context of the Distribution of Housing. I argued that the quantum of allocated employment sites within and around the village (some 13.16ha, the third highest of any settlement within the District) warrants a higher housing allocation than the 122 units proposed, and that the range of services available to Nazeing residents, combined with the population of the settlement, warrants its re-classification as a Large Village.

1.7 In this statement I summarise the main reasons why careful consideration should be given to redevelopment of this approximately 4.5ha block of land in preference to the 3.33ha (of which about 2.98ha is considered developable) at the southern end of the village to provide the 93 plus dwellings required to meet the current total allocation for Nazeing of 122. Assuming a density of about 22DPH in order to be compatible with adjacent housing, the promotion site could deliver in the region of 99 dwellings together with a good belt of structural landscaping along the western boundary adjoining Lee Valley Regional Park.

2.0 Advantages of the Promotion Site over Land Allocated under NAZE.R1, 3 and 4

2.1 The key points in support of the promotion site are:-

- The western end of Lakeside Nursery comprises previously developed land and hence, in accordance with policy SP2, its redevelopment should be given priority over greenfield/Green Belt land at the southern end of the village.
- The principle of housing on the eastern part of Lakeside Nursery located to the rear of nos. 115 to 123 North Street, and between three houses to the north (Hightorrs, Sunny Brae and Utopia) and two houses to the south (South Lodge and Windlesham) has been accepted.
- Whilst East Side and Lake Road Nurseries do not fulfil the legal definition of “previously developed land”, existing structures and activity have an impact on the openness and character of this part of the Green Belt which should be taken into account in determining their future use. This is illustrated by the aerial view at Appendix LN/005.
- There are no physical constraints which would prevent this approximately 4.5ha block of land from being redeveloped for residential purposes. As illustrated by the Flood Map at Appendix LN/002 to the Regulation 19 statement, the site lies within Flood Zone 1 whilst Appendix LN/003 establishes that the site is not part of an old land fill.
- The land is well located relative to key village facilities and services.
- Given the existing uses across the site, redevelopment would not add materially to traffic levels within the village and, once redeveloped, would eliminate existing HGV movements from both nurseries and the commercial yard.

- Redevelopment and incorporation of a sensitive landscaping scheme, especially along the western boundary next to Lee Valley Regional Park, would represent a significant visual improvement for users of the Park as well as existing residents of the 10 properties which adjoin the site.
- Residential redevelopment would be more acceptable than existing uses to neighbours.
- There would be no adverse impact on heritage assets.
- There would be no adverse impact on protected species.

3.0 The Effect of Development of NAZE.1, 3 and 4 on the purposes of the Green Belt.

3.1 NAZE.R1, 3 and 4 (a combination of parts of sites ref SR-0011, 0300 and 0473) is a greenfield site located at the southern end of the village entirely within the Green Belt. Appendix B1.1 to the Arup Report states that justification for its allocation can be found in Appendix B1.6.6 (EB805P).

3.2 Appendix B1.6.6 contains similar entries for all three areas, namely that where on-site constraints exist these can be overcome, that the land is available within the Plan period and that collectively these three parcels *“provide an opportunity to enable co-ordinated development through development of a Concept Framework Plan”*. There is no explanation, however, as to why these greenfield sites should be allocated in preference to previously developed/nursery sites, analysis of which *“considered (them) to be suitable”* for residential development.

3.3 Although not mentioned in Appendix B1.6.6, the site specific requirements for the South Nazeing Concept Framework Plan (as set out at Appendix 6 to the District Local Plan and required by Part H of Policy P10 Nazeing) records, inter alia, that development of the area may affect the habitat of Great Crested Newts and, particularly to the north, may impact upon the setting of a grade II listed building (Cutlands). The promotion site has no such constraints.

3.4 A detailed critique of this proposed allocation is provided at Section 3.3 of my response to the Regulation 19 consultation. As stated therein, the Council's Second Stage Green Belt Review assessed these parcels of land as performing strongly in terms of Green Belt Purpose 3, Assist in Safeguarding the Countryside from Encroachment. This led to the conclusion that the resultant harm to the Green Belt from development of this land would be very high. Conversely, the large block of land which includes the promotion site was seen to perform moderately in terms of countryside encroachment with a difference in character being noted between the open, flat fields in the western half of the parcel south of Nursery Road and built development (primarily glasshouses) in the eastern area. The Green Belt Review stated that the elevation of the horticultural development above the open fields gives a degree of transition from settlement to open land, with houses at the southern end of Nursery Road and on Nazeing Road limiting the extent to which the area is perceived as countryside. This led to the conclusion that *“The eastern half of the parcel, on sloping ground, has more relationship with the settlement than the flatter fields to the west and can be considered to make a relatively weak contribution to Purpose 3”*.

3.5 Having regard to the Council's sequential approach to site allocations, as set out in policy SP2, it is submitted that the promotion site should be seen as preferable to the allocated site to the south of the village.

Appendices

LN/001 Context/Location plan

LN/005 Aerial view