

LEE VALLEY REGIONAL PARK AUTHORITY
REGENERATION AND PLANNING COMMITTEE
22 MAY 2025 AT 11:30

Agenda Item No:

6

Report No:

RP/94/25

PLANNING CONSULTATION BY EPPING FOREST DISTRICT COUNCIL

PLANNING APPLICATION FOR DEMOLITION OF 11 BUILDINGS ALONG WITH ASSOCIATED WORKS, ADDITIONAL LANDSCAPING, BNG ENHANCEMENT AND INFRASTRUCTURE WORKS, EXTENSIONS TO UNIT 2 TO BE USED IN ACCORDANCE WITH STORAGE AND DISTRIBUTION (USE CLASS B8) AND RETENTION OF UNIT 5 AS ANCILLARY OFFICE SPACE TO USE CLASS B8. AT SEWARDSTONE HALL FARM, SEWARDSTONE ROAD, WALTHAM ABBEY, LONDON, E4 7RH

Presented by Head of Planning

SUMMARY

The application site is located within the Regional Park, to the west of Sewardstone Road. The application seeks permission to demolish 11 buildings at Sewardstone Hall Farm, extend Unit 2 and retain Unit 5 as ancillary office space, together with associated works in accordance with the storage and distribution use of the site. Landscaping and biodiversity net gain enhancements are also proposed, including within a dedicated area adjacent to Sewardstone Marsh.

The application site is currently used for storage and distribution purposes and the proposed development would result in the rationalisation of various buildings and structures on site together with landscape enhancements which would largely assist in screening views of the site from the adjacent areas of the Regional Park and create complementary areas of habitat.

However bat surveys need to be undertaken for some of the buildings that are to be demolished, and a tree on site and this should be provided as part of the application. There are also concerns about whether the proposed landscape plan for the southern boundary, which is shared with an informal access track into the Park, will be able to screen the site as proposed given the space available and the need to secure the site and erect the acoustic fencing; it is noted that a palisade fence secured to concrete blocks and presumed to be a temporary security measure has been erected on site along the same boundary. Therefore, whilst the proposals are considered acceptable in principle a holding objection is required to ensure the required bat surveys can be completed and any required compensation and mitigation considered. A detailed landscape planting plan should also be provided to demonstrate that the southern boundary hedge line can be strengthened to help screen both the site and any boundary fence from the Park.

RECOMMENDATIONS

Members Approve:

- (1) that Epping Forest District Council be informed that whilst the Authority accepts the principle of the proposed development at Sewardstone Hall Farm it places a holding objection on the current application in order that:

 - (a) further required bat surveys can be undertaken and completed and consultation on any recommended compensation and mitigation considered;
 - (b) further landscape details can be provided including a planting plan for the southern boundary of the site together with fencing details, to demonstrate that the existing hedgerow can be strengthened and the application site and fence line screened from the adjoining Regional Park.
- (2) that should the Council be minded to grant consent for the proposed development then the Authority would wish to see the following conditions attached to any grant of consent to secure:

 - i) submission of a detailed Landscape Planting and Management Plan to ensure the additional planting and habitat creation can be delivered and is protected and maintained over time;
 - ii) the provision of a Construction Environmental Management Plan to safeguard any protected species during the clearance of vegetation and habitat creation works;
 - iii) a Habitat Management and Monitoring Plan (HMMP) covering a minimum of 30 years post-development for the areas of biodiversity enhancement;
 - iv) the delivery of a sensitive lighting strategy for the site as set out in the lighting plan and with reference to the 'Institute of Lighting Professionals (2023) Bats and Artificial Lighting at Night Guidance Note 08/23' to ensure light spill is minimised; and
- (3) that Epping Forest District Council be informed that the Authority would wish to be consulted on

the above matters in due course.

BACKGROUND AND SITE CONTEXT

1 Location and Context

The application site is located within the Regional Park, on Sewardstone Road just south of its junction with Hawes Lane. Residential properties lie along Butlers Drive to the south, agricultural fields lie immediately to the west and a ribbon of housing and commercial development to the east. To the north and further to the west lies Gunpowder Park. The site comprises an area of approx. 2 hectares with 1.1ha identified as the B8 use and a separate parcel of land of 0.99ha to the southwest identified for biodiversity enhancement to meet the Biodiversity Net Gain (BNG) requirements. This area is included within the applicant's ownership, please refer to the location plan at Appendix A to this report.

- 2 The application site forms part of the Green Belt but is currently in use, and has permission for industrial processes, storage and distribution (the former B1c use now covered by use class E(g) (iii), B2 and B8 uses) and parking in connection with a haulage contractors business granted under EPF/1826/04 in June 2005. The site is characterised by a number of steel clad and brick built commercial/light industrial buildings, shipping containers and stored motor vehicles together with areas of hardstanding. There are 13 buildings on site (units 1 to 12 and 15). Buildings identified as '13' and '14' are dwellings that are located within the applicant's control but are located just outside the red line. Prior notification was required and granted under ref: EPF/0228/25 in February 2025 for the demolition of these two dwellings.
- 3 The area identified for biodiversity enhancements to achieve the BNG is currently a field used for grazing by horses. This lies adjacent to Sewardstone Marsh and the edge of Knight's Pits, land managed by the Authority, and designated as Local Wildlife Sites.
- 4 Access to the site is via a private road named 'Sewardstone Hall Farm', a tarmacked road that leads up towards the site from Sewardstone Road. The southern boundary of the site is bordered by a permissive pedestrian and cycle pathway that leads into the Park to Knights Pits and provides access to Enfield Island Village. This is a former MOD gated track which is also used by the Authority and the Environment Agency for operational purposes. The recent site visit carried out for this application noted a high palisade fence along the southern boundary of the site, which is not shown in the accompanying plans. This is presumed to be a temporary security measure as the fence is secured to concrete blocks placed within the site along the boundary of the site.
- 5 There are other publicly accessible routes to the north of the site within Gunpowder Park. The Authority owns and manages Gunpowder Park and Knights Pits as publicly accessible open space and has invested in improved pathway routes, and ecological enhancements.
- 6 The operational part of the site lies within Flood Zone 1, the lowest risk flood zone with a small area of medium risk along the site frontage. The proposed area for the BNG enhancement will be located on land within Flood Zone 2 and wet woodland tree species have therefore been chosen for this piece of land.
- 7 Applications for residential development of the site made in 2018 and 2019 have

been refused with appeals made against the decisions dismissed. The outline application from 2019 for 40 residential dwellings considered by the Authority in January 2020 (Paper RP/35/20 ref: EPF/2828/19), described the existing use of the site as a haulage yard reflecting the 2005 permission. The Authority did not object to the application recognising the site as 'previously developed' although further ecological surveys were required.

DESCRIPTION OF THE APPLICATION PROPOSALS

- 8 The proposed development involves the demolition of 11 buildings along with associated works, additional landscaping, BNG enhancement and infrastructure works, extensions to Unit 2 to be used in accordance with storage and distribution (Use Class B8) and retention of Unit 5 as ancillary office space to Use Class B8. Only Units 2 and 5 will be retained on site with Unit 2 extended to provide an additional 499.3sqm of internal B8 space. This is to be used for the storage and distribution of hire equipment. The development is expected to create 35 full time jobs. Operating hours will be between 07:00 – 18:00 Monday to Friday and on occasions 08:00 to 13:00 on a Saturday.
- 9 The height of Unit 2 will remain the same as the present building as the extension is horizontal on the western and eastern flanks. No external works are proposed to Unit 5. The applicant GAP Hire Solutions (who supply tools and mechanical/non-mechanical plant for hire) intend that the existing rear yard will continue to be used for B8 storage and distribution purposes. The breakdown of floorspace presented in the planning statement illustrates that the scheme will result in a reduction of 2,153.55m³ to the volume of buildings on site.
- 10 The Planning Statement submitted with the application explains that no development is proposed outside the 'developable area' already approved in June 2005. The reason the red line for the application extends beyond that area previously approved is to allow for the provision of additional landscaping/planting along part of the northern and southern boundary and along the western boundary. A 2.5m high acoustic fence is proposed adjacent to the northern area of planting (which is proposed as an amenity area for staff) with a 4m high section shown along a section of the site's southern boundary which is shared with the access track and residential development at Butlers Drive.
- 11 **Traffic, Access and Parking**
Access into the site will be controlled by electric sliding gates positioned adjacent to the yard. The Transport Assessment submitted with the application anticipates that the proposed development will result in a significant reduction in trips; the assessment of the existing site shows that it generates 11 vehicle movements in the AM peak hour, six vehicle movements in the PM peak hour and 110 vehicle movements across the daily period. The proposed development is forecast to generate 3 vehicle movements in the AM peak hour, 2 vehicle movements in the PM peak hour and 30 vehicle movements across the daily period.
- 12 A total of 13 car parking spaces will be provided including 2 disabled bays. This is a reduction in 42 spaces compared to existing provision. 4 spaces will have access to an active EV charge point and 5 spaces to a passive charging provision. A total of twelve cycle parking spaces are proposed.

13 Materials

The east and western flanks of unit 2 will be extended and the building reclad with profile cladding to part of the front and rear elevations and well as to the western flank elevation. Composite cladding panels (silver) are proposed to the new east flank elevations as well as part of the front and rear elevation covers. On the eastern elevation the cladding is made up of silver and blue bands which is the applicant's branding (GAP). No external works are proposed to Unit 5.

14 Lighting

A lighting impact assessment has informed the proposed lighting plan and has taken account of sensitive ecological receptors. Reference has been made to the ILP Guidance Note 08/23 - Bats and artificial lighting in the UK. The car park and external yard will be illuminated primarily via lights attached to Unit 2. Low level bollard lighting is also proposed in some areas of the yard. Two freestanding lights will be erected close to the northern boundary and landscaped amenity area but will be directed internally within the site to ensure that there is no unacceptable light spill into the countryside.

15 Landscape, Visual Impact and Ecology

The application is accompanied by a 'Landscape and Visual Impact Assessment and Green Belt Assessment'. This has considered and assessed the visibility of the site from public vantage points and rights of way including those within the Regional Park. It concludes that the proposals have been sensitively designed to reduce the overall building volumes and footprints, resulting in an overall improvement in the spatial openness of the site. It also finds that "In terms of visual openness, the built form will be no higher than already present and less spread across the Site, resulting in an overall increase to the Site's visual openness." It concludes that there will be very limited opportunities for views of the proposed redevelopment at the site and that the proposed redevelopment would result in a beneficial impact on the local landscape / townscape character and on views from the surroundings.

- 16** The Landscape Strategy Plan (please refer to Appendix B for a summary version) seeks to enhance the existing landscape framework by strengthening the existing vegetated boundaries with new native, tree and hedgerow planting. A new amenity area is to be established in the northwest of the site with tree and hedgerow planting and the creation of a species rich wildflower grassland with seating areas for staff. The area of land to the southwest identified for BNG enhancements is to include planting of a native thicket and trees adjoining the local wildlife site Sewardstone Marsh. The remainder will be seeded with a wildflower mix to suit the damper conditions. A new native hedge will be planted to separate this area from the remainder of the field to the east which will continue to be grazed.

- 17** The Preliminary Ecological Appraisal (PEA) accompanying the application identifies the need for further bat surveys prior to the commencement of construction activities for 7 of the 11 buildings to be demolished considered to have low potential for bat roosting (B1, B2, B3, B4, B9, B13 and B14) and in relation a tree within the site, T5. It recommends that any new lighting should be designed sensitively so as to maintain the site's suitability for foraging and commuting bats and connectivity to high quality foraging and commuting habitat within the wider landscape. It is also recommended that a Construction Environmental Management Plan (CEMP) is produced to include measures to protect various species that may use the site, especially during site clearance.

18 Biodiversity Net Gain

The Biodiversity Net Gain Plan confirms the creation of the new area of amenity grassland, in addition to a newly created area of willow scrub, the planting of 50 urban trees and species-rich native hedgerows, along with the enhancement of areas of unmanaged grassland fields currently in use for horse grazing. It calculates that the proposed development is likely to lead to a net gain of biodiversity of 20.80% and a net gain in hedgerows of 270.89%. It also recommends that measures to ensure the successful creation and long-term management of proposed habitats are outlined in a Habitat Management and Monitoring Plan (HMMP) for the site.

POLICY CONTEXT

19 National Planning Policy Framework (NPPF) as revised December 2024

The revised National Planning Policy Framework (NPPF) (December 2024) paragraph 154g states that the partial or complete redevelopment of previously developed land in the Green Belt is not considered inappropriate where it would not cause substantial harm to the openness of the Green Belt. Paragraph 155 also states that commercial or other development in the Green Belt would not be considered inappropriate where amongst other things "the development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan," (155a)).

20 The Glossary in the NPPF provides a definition of 'grey belt' which in summary is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. For information the 5 purposes of the Green Belt as set out at Paragraph 143 of the NPPF are as follows:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

21 Local Plan

Local Plan Policy DM4 (Green Belt) restricts development in the Green Belt other than for specified purposes. The Policy states that "within the Green Belt planning permission will not be granted for inappropriate development, except in very special circumstances, in accordance with national policy." Policy E1 Employment Sites, refers to existing employment sites, both designated and undesignated and states, (under Part A) that the Council will seek to retain and enhance existing employment sites and premises for their existing authorised uses within Use Class B2, B8 or E, or Sui generis uses of an employment character. Proposals for the redevelopment, or intensification, of existing employment sites for employment uses or Sui generis uses of an employment character will be encouraged, (Part B).

22 Epping Forest District Council recognise that the Local Plan will be an important document in terms of the protection, enhancement, development and management of the Lee Valley Regional Park (LVRP) and the public enjoyment of its leisure, ecological, heritage, and sporting resources. The Local Plan 2023 recognises and supports the Regional Park, its vision and remit, as a key asset

for the District, and component of the region's green and blue infrastructure (para 2.23). It also recognises the Park Development Framework (PDF).

- 23 Policy DM1 'Habitat Protection and Improving Biodiversity' states under bullet A that *"All development should seek to deliver net biodiversity gain in addition to protecting existing habitats and species. Development proposals should seek to integrate biodiversity through their design and layout, including, where appropriate, through the provision of connections between physical and functional networks."* The first part of Policy DM2 'Epping Forest Special Area of Conservation (SAC) and the Lee Valley Special Protection Area (SPA)' sets out the Council's position that all relevant development proposals should assist in the conservation and enhancement of the biodiversity, character, appearance and landscape setting of Epping Forest and the Lee Valley.
- 24 **Park Development Framework**
PDF Area Proposals 5.A.3 'Gunpowder Park & Sewardstone' under Visitors identify the importance of working with stakeholders to deliver a shared pedestrian and cycle route through the various open spaces east of the King George V Reservoir as a continuation of the Lee Valley Pathway, the National Cycle Network Route 1 which passes through Gunpowder Park. Proposals for Biodiversity state that Sewardstone Marsh and Patty Pool Mead should be managed and enhanced as a key access to nature site with habitat improvements to be undertaken throughout. Visitor access is to be enhanced by extending boardwalks and improving interpretation. Floodplain grassland and fen habitat to be enhanced on Sewardstone Marsh and existing wet woodland habitats at Osier Marsh and Sewardstone Marsh to be managed to maintain and expand their special wildlife interest. Visitor access to be enhanced by extending boardwalks and improving interpretation.
- 25 In the Lee Valley Regional Park Landscape Strategy, the application site lies adjacent to and in terms of the BNG site wholly within the character area Landscape Character Assessment (LCA) H1 (Gunpowder Park), where the landscape resource is important in terms of its nature conservation value and opportunities it provides for informal recreation. The focus should be on conserving and enhancing these valued qualities in the long term and ensuring it continues to support a diverse range of flora and fauna as well as opportunities for people to enjoy the valley landscape.
- 26 Development Framework Strategic Policies 2019 include policies to 'Conserve and enhance the Park's landscape character, key views and openness.' Those of most relevance are as follows:

L1: Require all development proposals to demonstrate how their location, scale, design and materials respect and respond to the character, sensitivities and qualities of the relevant landscape character areas, as detailed in the Landscape Character Assessment (LCA).
L2: Secure designs of new buildings and other structures which are appropriate to their landscape context as identified in the Landscape Character Assessment.
L4: Protect views that promote a sense of orientation and/or an appreciation of the natural and physical environment of the Lee Valley.'

PLANNING APPRAISAL OF PROPOSED DEVELOPMENT

27 Principle of Development

The application site comprises previously developed land within the Green Belt

and benefits from a planning consent for B8 storage and distribution uses. The proposals will result in an overall reduction in both floorspace and volume of buildings on the site and are unlikely therefore to cause substantial harm to the openness of the Green Belt. The site is also likely to be considered 'grey belt' as defined in the revised NPPF December 2024 (please refer to paragraph 20 above). The proposed development can therefore be considered acceptable in principle.

28 Visual Impact and Landscaping

In relation to the openness and landscape character of the adjoining areas of the Regional Park the application site is visually well-contained from the east. There are partial views into the site from permissive paths near Knights Pits and Sewardstone Marsh to the west and from Hawes Lane to the north, but beyond this visibility is obscured by intervening vegetation. From the south the visibility of the site is only partially screened by the existing hedgerow and the palisade fence along this boundary securing the site (although assumed to be a temporary measure) is clearly visible to pedestrians and cyclists using the former MOD track. The proposed extensions to Unit 2 will also be visible to people using this permissive route above the existing boundary hedgerow, but this in itself is not a substantial change to the current situation as Unit 2, given its proximity to the southern boundary of the site, is already visible from the track.

29 As the extensions to Unit 2 are horizontal and do not increase the height of the building they are unlikely to cause a greater impact than the existing building. Other buildings closer to the southern boundary are proposed for demolition which will help to offset any visual impact created by the extensions to Unit 2. The proposed silver cladding for Unit 2 appears similar to the existing silver/grey finish and the silver and blue cladding combination is on the eastern flank and therefore unlikely to be visible from the Park areas. The removal of a substantial number of buildings will assist in reducing the bulk of built form and clutter within the site, and therefore within the Regional Park, with associated minor improvements to the partial views through and across the site.

30 The Landscape Strategy Plan includes proposals to strengthen the hedgerow along the southern boundary, thicken tree planting to the western boundary to a double row of trees, and introduce new tree planting along the north-western boundary. This would over time help to obscure views into the site and close the existing gaps in boundary vegetation to help create a more robust buffer between the site and adjoining areas of the Park.

31 Whilst these proposals are welcomed there is concern as to whether there is sufficient space along the southern boundary to achieve a satisfactory buffer to the site as proposed in the Landscape Strategy Plan and in particular whether the existing hedgerow can be strengthened with additional planting sufficient to help screen the site and the proposed acoustic fence. It is also not clear whether the temporary palisade fence that is now on site (and which is not evident in the Landscape Visual Impact Assessment for the site) will remain as a permanent feature or whether the existing lower mesh fencing will be retained. A detailed planting plan should be provided to demonstrate this is achievable and to provide further detail on boundary fencing. This is important because the southern edge to the site also forms the boundary with the permissive access track into the Park, the majority of which has an attractive vegetated edge that links through to Sewardstone Marsh and Knight's Pits.

- 32 The proposed area to the southwest allocated for the BNG will add interest to the landscape and provide additional habitat to complement the adjoining area of Sewardstone Marsh. A Landscape Management Plan should be conditioned to ensure the additional planting and habitat creation is maintained over time. This could be linked to the Biodiversity Gain Habitat Management and Monitoring Plan if appropriate.
- 33 It is also considered that potential adverse impacts on the Regional Park from lighting have been minimised through the adoption of a lighting plan. This has taken account of sensitive ecological receptors in accordance and with reference to the ILP Guidance Note 08/23 - Bats and artificial lighting in the UK. Lighting is directed away from the more sensitive areas of the Park to the north and west and the operational hours are such that nighttime lighting should not be an issue.
- 34 **Ecology**
The PEA has provided a detailed assessment of the site and made a number of recommendations for biodiversity enhancement measures, including the planting of native species, provision of invertebrate houses, bird boxes, bee bricks and deadwood features in proximity to suitable foraging habitat. These would enhance the site, its biodiversity and associated landscaping for wildlife and should be conditioned. The PEA also recommends that a Construction Environmental Management Plan (CEMP) is produced to provide a method for the clearance of vegetation and rubble/log piles so as to avoid harm to protected species and this is endorsed by officers.
- 35 The PEA has recommended that there should be additional bat surveys on the buildings and one tree that have been assessed as having low potential for roosting bats. The results of this should then feed into an Ecological Impact Assessment which would determine the impacts and outline the required compensation and mitigation. This information should have been provided at the time of the application so the Council have all relevant information before making a decision.
- 36 **Biodiversity Net Gain**
The proposal to set aside an area which is within the Regional Park, adjacent to Sewardstone Marsh for biodiversity enhancement as part of the application is welcomed as are the proposed ecological enhancements within the site. The use of wetland species as part of the planting scheme has the potential to complement the adjoining habitats within Sewardstone Marsh and provide additional habitats for wildlife. The importance of securing appropriate management for the long term is noted in the Biodiversity Net Gain Plan and this will need to be secured via a Habitat Management and Monitoring Plan (HMMP) covering a minimum of 30 years post-development. Given the proximity of the BNG area the Authority should be consulted on the HMMP in due course, should planning consent be granted.
- 37 **Conclusion**
As previously developed land, currently in use for storage and distribution purposes the proposed development would be considered acceptable in principle. However, a holding objection is required to enable the required bat surveys to be undertaken. As biodiversity is a material consideration within the planning process these should be completed and the results taken into consideration including any required compensation and mitigation when the decision is made. Further detailed landscaping plans showing the planting

scheme and fencing details for the southern boundary should also be provided to ensure the landscape enhancements proposed can be delivered and the visual amenity and landscape character of the Regional Park enhanced.

ENVIRONMENTAL IMPLICATIONS

38 These are addressed in the body of the report.

FINANCIAL IMPLICATIONS

39 There are no financial implications arising directly from the recommendations in this report.

LEGAL IMPLICATIONS

40 Planning applications referred to this Authority are submitted under the consultative arrangements of Section 14 (4-7) of the Lee Valley Regional Park Act 1966 (the Park Act). The Park Act requires a local planning authority to consult with the Authority on any planning application for development, whether within the designated area of the Park or not, which might affect any part of the Park.

41 The Park Act enables the Authority to make representations to the local planning authority which they shall take into account when determining the planning application.

RISK MANAGEMENT IMPLICATIONS

42 There are no risk management implications arising directly from the recommendations in this report.

EQUALITY IMPLICATIONS

43 There are no equality implications arising directly from the recommendations in this report.

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BACKGROUND REPORTS

Consultation by Epping Forest District Council

April 2025

APPENDICES ATTACHED

Appendix A	Plan of the application site
Appendix B	Landscape Plan

LIST OF ABBREVIATIONS

BNG	Biodiversity Net Gain
PEA	Preliminary Ecological Assessment
CEMP	Construction Environmental Management Plan

SPA	Special Protection Area
PDF	Park Development Framework
LVRP	Lee Valley Regional Park
SAC	Special Area of Conservation
HMMP	Habitat Management Monitoring Plan
MOD	Ministry of Defence
ILP	Institute of Lighting Professionals
NPPF	National Planning Policy Framework
LCA	Landscape Character Assessment
the Park Act	Lee Valley Regional Park Act 1966

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Demolition of buildings, landscaping, BNG enhancement and extensions to Unit 2 for Storage and Distribution Use at Sewardstone Hall Farm

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former MOD track

Park Boundary

Application Site

Applicant Land Ownership

Ordnance Survey
(OS) via PSGA

Landscape Strategy Plan summary

