

Epping Forest District Council Representations to the Draft Local Plan Consultation 2016 (Regulation 18)

Stakeholder ID	4629	Name	Matthew	Winslow	Basildon Borough Council
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Method	Letter
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Date	4/2/2017
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Letter or Email Response:

Epping Forest District Council's Draft Local Plan Consultation (Regulation 18) Please accept this letter as a formal response from Basildon Borough Council in relation to the consultation on Epping Forest District Council's Draft Local Plan Consultation. Basildon Borough Council is pleased to be consulted by Epping Forest District Council on its Draft Local Plan Consultation. Basildon Borough Council has considered the documentation and evidence published and has the following comments to make on the draft Local Plan under the following section headings. Housing Need Consideration has been given to the proposals set out in the Epping Forest District Council Draft Local Plan. Basildon Borough Council support the approach that Epping Forest has taken to identifying their OAN. It is noted that Epping Forest forms a part of the Strategic Housing Market Area including East Hertfordshire District Council, Harlow District Council and Uttlesford District Council. Based on the 2014 population and household projections (published in July 2016) Epping Forest District Council Draft Local Plan sets out that the Strategic Housing Market Area is not seeking to meet its projected housing needs in full. Basildon Borough Council has concerns regarding this approach as it could result in unmet housing need arising, potentially placing additional pressure on the South Essex Authorities to help meet this unmet need. Whilst Basildon Borough is seeking to meet its lower OAN for housing need in full, there are other parts of the South Essex Housing Market Area (Castle Point and potentially Southend-on-Sea) where there are recognised difficulties in accommodating the quantum of housing needed due to physical capacity. Due to Green Belt and infrastructure constraints, and growth arising from migration pressures from Greater London, there are concerns that the need arising from the whole South Essex Housing Market Area will not be able to be accommodated in full. Further pressure for housing growth from outside the South Essex Housing Market Area is therefore a significant concern. Basildon Borough Council, would therefore seek assurances from Epping Forest, and those other authorities within West Essex and Hertfordshire, that the SHMA will be updated to incorporate the latest population and household projections and they will aim to identify how their unmet need is addressed as they progress towards Regulation 19. It is noted that, to date, Basildon (and to its knowledge), the other South Essex Authorities, have not been approached by Epping Forest District Council or any of the other Councils within the West Essex Housing Market Area, regarding the strategic implications of their unmet housing need. Employment Need Basildon Borough Council supports the approach being taken to meeting the employment needs of Epping Forest District and has no objection to make in relation to the sequential approach being taken. Gypsy and Traveller Accommodation Basildon Borough Council generally supports the approach taken in relation to Gypsy and Traveller accommodation provision. Basildon Borough Council would however advise that it remains in the position, as Epping Forest District Council were advised by the Basildon Borough Draft Local Plan 2016, that it is not possible to meet Basildon Borough's identified need for Gypsy and Traveller

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accommodation in full. A Site Potential Study has been undertaken which cannot identify sufficient suitable sites for the accommodation of Gypsies and Travellers, based on the need identified in the Basildon GTAA 2014. Whilst a revised GTAA is underway, responding to the changes introduced by the amended Planning Policy for Traveller Sites 2015, which may affect the quantum of un-met need being present in the Basildon Borough, at this time the outcomes of this assessment are not known and Epping Forest District Council should consider the possibility that it may still be called upon to help meet the needs of Gypsies and Travellers that cannot otherwise be accommodated in full in the Basildon Borough.

Duty to Cooperate As another authority in Essex, Basildon Borough Council wishes to bring these strategic matters to the attention of Epping Forest District Council through the consultation on the Epping Forest District Council Draft Local Plan. Basildon Borough Council requests that pursuant to the Duty to Cooperate and the requirements of the National Planning Policy Framework, that Epping Forest District Council considers these matters further and determines whether any reasonable opportunities exist within Epping Forest District to better address the unmet objectively assessed development needs arising within its own Housing Market Area, or how it otherwise intends to address these, recognising the issues faced in a similar regard within the South Essex Housing Market Area.

Sustainability Appraisal - Epping Forest District Council Site Selection Report Epping Forest has set out within their Site Selection Report (Arup 2016) how the potential sites for housing development across the District have been identified. Basildon Borough Council has some concerns regarding the methodology used. A number of sites were discounted for housing allocation and not deemed 'preferential', over other sites which were considered to be more suitable and achievable based on cumulatively providing 'the desired development quantum in this settlement'. This implies that further sites across the District may be suitable, available and achievable in a variety of settlement areas and could contribute to Epping Forest meeting its higher projected OAN, or the SHMA area meeting its needs in full. The approach that has been taken is not considered to be based on evidence and it is therefore not justified. Epping Forest should look to reconsider these potential development sites for addressing unmet housing needs. I trust this response is of assistance to you in progressing your Local Plan, and I look forward to discussing and working through those matters raised in relation to the Duty to Cooperate with you in due course. I trust this response is of assistance to you in progressing your Local Plan, and I look forward to discussing and working through those matters raised in relation to the Duty to Cooperate with you in due course.

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