

Stakeholder Reference:
Document Reference:

Part A

Making representation as Agent on behalf of Landowner or Land Promoter

Personal Details		Agent's Details (if applicable)
Title	Mr	
First Name	George	Stephen
Last Name	Darlington	Hayhurst
Job Title (where relevant)		Chartered Town Planner
Organisation (where relevant)	Hastingwood Developments Limited	Hayhurst Town Planning Services Limited
Address	Hastingwood Business Centre, Hastingwood, Harlow CM17 9JN	[REDACTED]
Post Code	CM17 9JN	[REDACTED]
Telephone Number	01279413533	[REDACTED]
E-mail Address	george@hastingwoodgroup.co.uk	[REDACTED]

Part B

REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?

Paragraph:

Policy: SP 2 Spatial Development Strategy 2011-2033

Policies Map: No

Site Reference: None of the above

Settlement: Harlow

Do you consider this part of the Pre Submission Local Plan to be:

Legally compliant: Don't Know

Sound: No

If no, then which of the soundness test(s) does it fail? Justified, Consistent with national policy

Complies with the duty to co-operate? Don't Know

Please give details either of why you consider the Submission Version of the Local Plan is not legally compliant, is unsound or fails to comply with the duty to co-operate; or of why the Submission Version of the Local Plan is legally compliant, is sound or complies with the duty to co-operate. Please be as precise as possible. Please use this box to set out your comments.

The 2017 update to the SHMA has indicated that the full objectively assessed need for housing in Epping Forest District is 12,573 new homes within the plan period, but the plan only allocates sites for 11,400 new homes. There is plenty of scope for allocating sites, including my clients' land at Jacks Hatch, to meet the full objectively assessed housing need, without causing significant harm to the Green Belt or breaching other key planning constraints. Therefore the proposed allocation is a significant under provision, contrary to paragraph 47 of the NPPF, which requires LPAs to meet the full, objectively assessed needs for market and affordable housing in their areas.

The proposed Water Lane Masterplan area covers multiple ownerships and, for example, includes many horticultural nurseries to the north of the area, some of whose owners are not committed to the loss of their businesses. There is therefore considerable doubt that all the allocated land is developable, as required by paragraph 47 of the NPPF.

The land edged in red on the attached plan has an area of about 6.2ha and lies on the southern side of Parsloe Road. It is capable of accommodating about 180 homes. My client is also prepared to offer that 50% of the homes should be affordable.

The site is well-related to the built-up area, with existing development to the north-east, north, west and south-west, and its southern boundaries well-defined by existing hedgerows and trees.

Like the main Water Lane area this site also occupies one of the most sustainable locations in the District on the edge of Harlow. The site is fully provided with mains services.

Please set out what change(s) you consider necessary to make the Pre Submission Local Plan legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Paragraph A of policy SP2 should be amended by increasing the figure of 11,400 to 12,573 to bring it in line with the requirements of paragraph 47 of the NPPF.

In paragraph B of policy SP2 the allocated housing for 'Sites around Harlow' should be increased to at least 4,100 to accommodate the additional housing that could be developed south of Parsloe Road, in order to assist with meeting the requirements of paragraph 47 of the NPPF.

If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

REPRESENTATION

To which part of the Pre Submission Epping Forest District Local Plan does this representation relate?

Paragraph:

Policy: SP 5 Garden Town Communities

Policies Map: Yes

Site Reference: SP 5.2

Settlement: Harlow

Do you consider this part of the Pre Submission Local Plan to be:

Legally compliant: Don't Know

Sound: No

If no, then which of the soundness test(s) does it fail? Justified, Consistent with national policy

Complies with the duty to co-operate? Don't Know

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In SP5.2 and paragraph G(i) increase the number of homes allocated to the Water Lane area to 4,100.

Amend Map 2.3 to exclude the objector's land south of Parsloe Road from the Green Belt (as outlined in red on the attached plan) and include the land in the Water Lane Masterplan Area and allocate the land for housing.

These changes would assist the plan with meeting the full objectively assessed need for housing in the District in one of the most sustainable locations in the District on the edge of Harlow, and would provide genuinely developable land as an alternative to other land in the Water Lane Masterplan Area which is unlikely to come forward for development.

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No, I do not wish to participate at oral examination

If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination

Yes

Signature: Stephen Hayhurst Date: 18/01/2018