

Representations on Epping Forest District Local Plan Submission Document (Regulation 19)

On behalf of Croudace Homes

Land east of Epping Road, Roydon

January 2018



1. Background and overview

- 1.1 These representations on the Epping Forest Local Plan Submission Version (LPSV) are submitted by Strutt and Parker on behalf of Croudace Homes, and in respect of land east of Epping Road, Roydon.
- 1.2 Land east of Epping Road, Roydon is identified as sites SR-0306 and SR-0890 as part of Epping Forest District Council's (EFDC) plan-making process. Site SR-0306 comprises the site in its entirety, whereas site SR-0890 considers the western portion of site SR-0306.
- 1.3 Land to the east of Epping Road, Roydon is being actively promoted for development by Croudace Homes, an established house-builder with a track record of delivering quality development in the region. For the purpose of submissions to the Council, the land was divided into two: Area A to the west; Area B to the east. The site and these areas are illustrated in **Appendix 1** of this submission.
- 1.4 The site lies within the arc of two elements of Roydon: to the north and west is existing residential development. The site projects no further eastwards or southwards than the existing settlement.
- 1.5 The site totals approximately 14 hectares, is an essentially flat, greenfield site, and is currently arable farmland. The site is not subject to any restrictions that prohibit its development, other than its current planning allocation as Green Belt.
- 1.6 For the purposes of consideration by EFDC, Area A and Area B combined were assessed as site SR-0306; separately, Area A was assessed by itself as site SR-0890.

SR-0306	Area A + Area B
SR-0890	Area A

- 1.7 The site is considered to represent a sustainable location for housing to help meet local need. It is suitable, achievable and available – it is a deliverable site.
- 1.8 Notwithstanding the above, the LPSV fails to propose allocation of the site for development.
- 1.9 Information was provided to the Council as part of a formal consultation response at the Regulation 18 stage of the Local Plan, setting out how the site was sustainable and deliverable. There is no evidence that these representations have been given due consideration.
- 1.10 The rejection of the site is considered unjustified and contrary to national policy, rendering the Local Plan unsound.

- 1.11 Furthermore, the failure to allocate the site for residential development is considered particularly concerning given the Local Plan fails to meet objectively housing needs in full.
- 1.12 The details of our concerns, why the Local Plan is considered unsound, our concerns in respect of legal compliance, and action we considered necessary to ensure the Local Plan is sound and legally compliant, is set out within these representations.

2. Local Plan objectives

- 2.1. Objective B i) of the LPSV is “to make provision for objectively assessed market and affordable housing needs within the District, **to the extent that this is compatible with national planning policy**” (emphasis added).
- 2.2. The NPPF is clear that the Local Plan should be prepared on a strategy that seeks to meet objectively assessed housing need in full, i.e. meeting housing needs in full is an intrinsic aspect of being in accordance with national policy. As such, the proposed caveat to objective B i) is unnecessary and unhelpful, and we suggest it be removed

3. Policy SP2 – total number of new homes proposed

- 3.1. Policy SP2 proposes a total of 11,400 dwellings be provided in the District between 2011 and 2033.
- 3.2. The figure calculated as being Epping Forest District’s objectively assessed housing need has fluctuated in recent years.
- 3.3. The West Essex and East Hertfordshire Strategic Housing Market Assessment (SHMA, 2015) identified a need for the housing market area (East Herts, Epping Forest, Harlow and Uttlesford) of 46,100 dwellings between 2011 and 2033, of which 11,400 are for Epping District specifically (equating to 514 dwellings per year).
- 3.4. In August 2016 Opinion Research Services (ORS) updated the overall housing need to take into account more recent information, including more up-to-date household projections, and identified a revised objectively assessed housing need for the housing market area of 54,608 between 2011 and 2033. The update goes on to state that the objectively assessed housing need for Epping Forest District is 13,278 dwellings in Epping Forest (equating to 604 dwellings per year). Subsequently, a further update was produced in 2017.
- 3.5. As reported within the LPSV (paragraph 2.43), this latest update identified a housing need of 51,700 new homes over the period 2011-2033 for the housing market area; of which 12,573 are need in Epping Forest.
- 3.6. The justification for failing to meet objectively assessed housing needs in full appears to be that the lower figure of 11,400 dwellings for Epping Forest was set out in a Memorandum of Understanding (MoU), agreed by the authorities within the housing market area.

- 3.7. The MoU was agreed in March 2017 and predates the latest assessment of housing need (July 2017).
- 3.8. The MoU proposes a total of 51,100 homes be provided across the housing market area as a whole for 2011-2033. However, the latest July 2017 assessment of need suggests the total need for this area is 51,700 homes. As such, it is not the case that an element of Epping Forest's proposed unmet need will be met elsewhere within the housing market area, and the total housing need met for the housing market area.
- 3.9. The LPSV as currently proposed does not meet development needs in full, nor is the unmet need met elsewhere within the housing market area. It is therefore contrary to national policy and cannot be considered positively prepared as per the definition at paragraph 182 of the NPPF. As such, the Local Plan in its current form is unsound.
- 3.10. There is a potential remedy to address this defect: the allocation of additional, deliverable sites for housing to ensure that development needs are, as a minimum, met.
- 3.11. The LPSV refers (at paragraph 2.54), to the figure of 51,100 net new homes for the housing market area as being agreed by the Co-operation for Sustainable Development Board because it was "the most sustainable choice for the HMA in light of the evidence available".
- 3.12. The provision of 51,100 homes for the period 2011-2033 for the housing market area was considered through the Sustainability Appraisal of Strategic Spatial Options for the West Essex and East Hertfordshire Housing Market Area (SA of SSO) (September 2016).
- 3.13. Firstly, it should be noted that this pre-dates the latest assessment of housing needs.
- 3.14. Furthermore, and in any case, it is considered that the SA of SSO does not robustly support the view that the housing market area cannot accommodate more than 51,100 homes. For example, at page 34 it states:
- "With respect to the overall quantum of c. 51,100 new homes, this reflects the furthest **the authorities consider that they can reasonably go** in delivering the **most recent advice** from ORS regarding housing need, i.e. 54,608 homes to 2033, in light of the available evidence. Critically, the figure of c. 51,100 significantly exceeds the formal OAHN of 46,100 established through the SHMA and represents strong progress towards the revised figure. The **critical** issue in determining the overall quantum is the level of development that can be accommodated **in and around Harlow** on **suitable** sites during the plan period."
(Emphasis added).
- 3.15. From the above, in addition to the provision of the most recent assessment of objectively assessed housing need not having been appraised, it is also apparent that the ceiling of the number of homes that could be provided is based on the authorities' perception of housing capacity.

- 3.16. There has also been a focus on the capacity for Harlow to accommodate growth to determine overall housing number, overlooking the multiple other settlements in the housing market area.
- 3.17. Furthermore, the identified quantum appears to be based on the number of suitable sites in and around Harlow (again overlooking other settlements) which results in a figure that could not have accounted for additional sites submitted for consideration since 2016; or sites initially identified as unsuitable but which information submitted through consultation at the Regulation 18 stage of the Local Plan confirmed were in fact deliverable – sites such as SR-0306 and SR-0890.
- 3.18. In addition to concerns that the objectively assessed need is not proposed to be met through the LPSV, there is no evidence that consideration has been given to the need to help improve affordability of housing in the District (as per PPG 020 Reference ID: 2a-020-20140306) and para.9 of the NPPF); or whether the total quantum of housing proposed will result in the delivery of the District’s affordable housing need in full.

4. Policy SP2 – principal of reviewing the Green Belt to accommodate housing

- 4.1. The principle of reviewing the Green Belt as currently allocated in the now out-of-date Development Plan in order to meet development needs is considered justified, effective, consistent with national policy and necessary in order to ensure the Local Plan is positively prepared.
- 4.2. Indeed, we have concerns that additional land is required to be allocated in order to ensure the Local Plan is sound, over and above that which the LPSV proposes be allocated for development.
- 4.3. National planning policy places great emphasis on the need to significantly boost housing land supply, and to ensure Local Plans meet housing need. The NPPF sets out the core planning principles, which should underpin plan-making and decision-taking. These including the following:

“Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. (NPPF paragraph 17).”
- 4.4. The Local Plan must be ‘sound’ in order for the Council to be able to adopt it. The NPPF confirms at paragraph 182 that if a Local Plan is to be sound it must be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- 4.5. There is evidently a current, acute shortage of housing within Epping Forest District.

- 4.6. The Council has undertaken a review of the amount of residential development that can be accommodated within District through various sources of supply.
- 4.7. The Local Plan evidence base has clearly demonstrated that objectively assessed housing needs cannot be met without review of the Green Belt boundary and the allocation for housing development of some land currently allocated as Green Belt in the current, but out-of-date, Development Plan. Furthermore, the Council has not demonstrated that the unmet needs arising from it are being met elsewhere within the housing market area.
- 4.8. Accordingly, it is evident that exceptional circumstances exist which justify review of the Green Belt boundary through the Local Plan, as per paragraph 83 of the NPPF.
- 4.9. Furthermore, the NPPF (at paragraph 83) confirms that the preparation of a Local Plan is the appropriate (indeed, only) vehicle through which changes to the Green Belt boundary should be made.
- 4.10. Having regard to the above, the principle of reviewing the Green Belt boundary and allocating land for housing through the Local Plan is supported. This approach is supported by national policy, and is necessary in order to prepare a sound Local Plan.

5. Policy SP2 – accompanying housing trajectory

- 5.1. The housing trajectory which the LPSV (and policy SP2) is projected to deliver is set out within Appendix 5 of the draft plan.
- 5.2. There are two potential approaches to addressing shortfall in housing land supply. The first, the 'Liverpool approach' is where the shortfall is spread across the remaining Plan period and is sought to be met over this period. The alternative, the 'Sedgefield approach', is where the shortfall is made up within the five-year period.
- 5.3. The PPG is clear that the Sedgefield approach should be applied where possible, stating:

"Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the 'Duty to cooperate". (PPG, Paragraph: 035 Reference ID: 3-035-20140306).
- 5.4. The Sedgefield approach is also clearly more closely aligned with the requirements of the NPPF (paragraph 47) and the need to boost significantly the supply of housing and address under delivery.
- 5.5. Nevertheless, the housing trajectory in Appendix 5 confirms that the LPSV will not attempt to make up shortfall in the first five years, and instead proposes to adopt the Liverpool method

to addressing backlog (i.e. by seeking to make up existing shortfall over the entirety of the plan period).

- 5.6. It is considered that such an approach is contrary to national policy. Justification for this approach has not been provided.
- 5.7. Furthermore, we are concerned that the trajectory is somewhat optimistic and that the five-year requirement, even when using the lower figure that use of the Liverpool approach identifies, will not be delivered.
- 5.8. The trajectory in Appendix 5 shows delivery of Local Plan allocation sites from 2018/19. The Local Plan is not scheduled to be adopted until after this year, in May 2019.
- 5.9. The majority of sites that are projected to be delivered in the years after 2018/19 are large sites which are likely to seek to acquire outline planning permission. After securing outline permission (which in itself requires time), it would still be necessary for the prospective developer to secure approval of reserved matters, discharge conditions, meet S106 obligations, and agree S278 requirements. Commencement of development does not immediately result in completions, and time should also be factored in.
- 5.10. In addition, it is also unclear how the capacity of specific sites included within the housing trajectory has been calculated. The NPPF calls for high-quality development which accounts for the character of the area in which it is situated (paragraph 17). It also states that Local Plans should set out their own approach to housing density to reflect local circumstances (paragraph 47). The LPSV – rightly – contains policies seeking to ensure high quality design and the protection of residential amenity. However, in determining the capacity of sites within the housing trajectory, it is unclear as to how such considerations have been applied.
- 5.11. The Report on Site Selection (2017) is incomplete at the time of the consultation on the LSVP (as discussed further below), and it is not clear what factors have been taken into account in determining specific densities to be applied to specific sites. By way of example, we note that in the case of ROYD.R3 the LPSV assumes the site will be able to deliver 14 dwellings. However, we would very much question such a conclusion – this would necessitate development of the site at a density very much higher than the surrounding development. At Appendix 6 of the LPSV, it is suggested that the indicative net density of development at ROYD.R3 would be 39 dwellings per hectare, which would vastly exceed that of adjoining development and of the surrounding area. In addition, it would of course be necessary for any scheme to have regard to the proposed development's relationship with neighbouring dwellings. Once these factors are accounted for we consider that even a capacity of 6-8 dwellings would represent an optimistic assessment of the site's delivery.
- 5.12. Cumulatively across the District, the overestimation of sites' capacities will have a significant impact on the potential delivery from sites identified in the housing trajectory, further exasperating the shortfall of housing provision against need. The extent of this is unclear in the absence of density Report on Site Selection (2017) Appendix B.

- 5.13. Having regard to the above, there are significant concerns that the LPSV in its current form fails to address housing need, particularly within the short-term. In order to ensure an effective Local Plan which is positively prepared, it will be necessary to allocate additional deliverable sites.

6. Policy SP2 – approach to Roydon

- 6.1. Policy SP2 of the LPSSV proposes to direct 62 dwellings to the settlement over the entirety of the plan period (2011-2033).
- 6.2. Elsewhere within the LPSV (at Table 5.1), Roydon is defined as a “small village”.
- 6.3. The LPSV sets out the following vision for Roydon:

“Roydon will continue to serve the convenience needs of the local community. It will maintain its rural and local character, with sensitive design aimed at preserving the historic character of the Village. Site allocations will focus on maintaining the existing settlement pattern and ensure the continued preservation of important Green Belt, preventing coalescence between Roydon and Harlow Town. The village will build upon its key strengths, such as the mainline railway station, as well as other assets such as the historic church, Marina Village and surrounding Lee Valley Regional Park. Links to the Lee Valley Regional Park will be improved, with impacts of recreational pressure minimised. The glasshouse industry will be supported and will continue to thrive by adapting to future challenges.”

- 6.4. The LPSV recognises that Roydon is a distinctive settlement with an established community, and it is clear that the vision for Roydon seeks to ensure it remains a vital and vibrant community.
- 6.5. The LPSV should recognise that supporting thriving rural communities is one of the core planning principles (NPPF, paragraph 17).
- 6.6. At paragraph 28 of the NPPF, it states that planning policies should help ensure the retention and development of local services and facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.
- 6.7. Further to the requirements of the NPPF, the Planning Practice Guidance (PPG) explains how Local Planning Authorities should support sustainable rural communities. This states (at paragraph: 001 Reference ID: 50-001-20160519) the following:

“It is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements.”

And

“A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. **Rural housing is essential to ensure viable use of these local facilities**” (emphasis added).

- 6.8. The LPSV’s proposed provision of such a low number of homes for Roydon between 2011 and 2033 is considered insufficient to support its vitality and it is unclear how the number is sufficient to sustain the viability of the settlement, as required.
- 6.9. Separately, and in addition, it is important for the Local Plan to not adopt an overly prescriptive approach to the distribution of housing based on the proposed settlement hierarchy and its existing size. This would result in an overly simplistic approach, which would fail to direct development to the most sustainable locations, and could result in more suitable and sustainable opportunities being overlooked.
- 6.10. The following comments of the Planning Inspector appointed to examine the 2014 Uttlesford Local Plan Submission document support the above view:

“Where it can be justified by relevant economic, social and environmental factors a case can sometimes be made to direct a greater or lesser amount of development to a settlement than would reflect its strict place in the settlement hierarchy. Some of the factors discussed during the hearing (eg locally identified demographic and other needs, local constraints and opportunities, patterns of bus services, and inter-relationships between particular settlements) can be relevant to such decisions and can be considered in taking the plan forward” (paragraph 3.25 of the Inspector’s Examination Conclusions 19 December 2014).

- 6.11. In respect of the above and the proposed strategy towards distribution of housing and the approach towards Roydon, we note that Roydon is the only settlement in the District which benefits from a national railway station. The NPPF is clear that Local Plans should seek to exploit opportunities for the use of sustainable transport modes, and development should be located where there is access to public transport facilities (paragraph 35). The NPPF states that planning should actively manage growth to make the fullest possible use of public transport. Focussing development in locations which are sustainable in this respect is one of the core planning principles of the NPPF.
- 6.12. The above all suggests that a significantly greater proportion of the District’s growth should be directed to Roydon than proposed through the LPSV, and that the LPSV’s approach is not in accordance with national policy nor is it justified.
- 6.13. As currently proposed there is a disconnect in the LPSV between the proposed vision for Roydon and the policies which should deliver this vision.

7. Policy SP2 – ability for Local Plan to respond to rapid change

- 7.1. It is noted that SP2 proposes to deliver fewer homes than have been identified in recent assessment work as being needed in the District.
- 7.2. In addition to requiring the Local Plan to meet objectively assessed housing needs in full, the NPPF (paragraph 14) requires the Local Plan meet needs with sufficient flexibility to respond to rapid change.
- 7.3. One such change that the Local Plan can and should anticipate is the impending increase in the District's objectively assessed housing need.
- 7.4. The Government published proposals to reform the planning system to increase the supply of new homes and increase local authority capacity to manage growth within 'Planning for the right homes in the right places' in September 2017. This includes proposals to introduce a standard methodology for calculating housing need. The consultation document makes very clear that the Government will be introducing a standardised methodology for Local Authorities to use to calculate their housing needs. It is noted that using this standardised methodology, Epping Forest District's housing need is 923 dwellings per annum. A substantially greater number than the 514 dwellings per annum the LPSV currently proposes to provide.
- 7.5. The Council are very much aware of the impending increase in objectively assessed housing need, and the change this would necessitate in respect of their Local Plan. We note that in the foreword of the plan it states:

“We are on schedule to deliver the Plan to the Inspectorate before the end of March 2018 deadline...To fail to do this would expose us all to the risk of the housing requirement rising from 11,400 to over 20,000 homes by 2033.”
- 7.6. In addition, the Officer's Report to Council on 14 December 2017 (**Appendix 2**) at which the LPSV was agreed, suggested to Members that there were one of two options available to them: agree the LPSV; or delay the Local Plan and accept a new housing target of 923 homes per annum.
- 7.7. Epping Forest District is predominantly Green Belt. In the event that a Local Plan were to be adopted allocating land which left a substantial unmet, development need, having regard to the NPPF (which makes clear that for the purposes of applying the presumption in favour of sustainable development, development of the Green Belt is a specific policy which indicates development should be restricted (paragraph 14); and that Green Belt should only be altered through a Local Plan (paragraph 83)), there is little realistic prospect that the unmet need could be met through reliance on the application of the presumption in favour of sustainable

development. Even if it such an approach could potentially meet the unmet demand, it would clearly not be effective or consistent with national policy to rely on this.

- 7.8. Paragraph 85 of the NPPF sets out the criteria Local Planning Authorities should meet when defining Green Belt boundaries. One criterion is that Local Planning Authorities should satisfy themselves that the Green Belt boundary will need to be altered at the end of the Plan. In the case of the LPSV, it is clear that the Green Belt boundary will required to be altered significantly before 2033 and the end of the plan period. Furthermore, the Council are clearly aware that this is the case.
- 7.9. Having regard to the above, the LPSV in its current form is not sound. However, this defect could be addressed through the allocation of additional land for housing to account for the likely event of a significant increase in housing need.

8. Policy P9 – approach to Roydon

- 8.1. For the reasons set out elsewhere within this representation, in response to Policy SP2, the quantum of development proposed to be directed to Roydon through the LPSV is not considered to be sound.

9. Rejection of sites SR-0306 and SR-0890

Sustainability Appraisal / Strategic Environmental Assessment / (SA/SEA) and Evidence Base

- 9.1. The Environmental Assessment of Plans and Programmes Regulations (2004) requires SA/SEAs to *inter alia* set out the reasons for the selection of preferred alternatives, and the rejection of others, be made set out.
- 9.2. In addition, the Planning Practice Guidance makes clear (paragraph: 038 Reference ID: 11-038-20150209) that the strategic environmental assessment should outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives.
- 9.3. However, despite the above, the SA/SEA published alongside the LPSV (Sustainability Appraisal (incorporating Equalities Impact Assessment) for the Epping Forest District Local Plan (December 2017)) does not explain why land to the east of Epping Road, Roydon has been rejected as a residential allocation option.
- 9.4. The SA/SEA explains the site selection process, but not the results of this. The SA/SEA makes a number of references to the Site Selection Report (a separate document to the SA/SEA). For example, at paragraph 7.17, in text explaining the site selection methodology it states:

“However, site assessments for Tranche 1 sites were reviewed against the comments raised in site promoter’s representations to the Draft Local Plan consultation. The Report on Site Selection 37 **will** include a table that identifies those sites for which representations

from site promoters were made and where a change was made to the assessment in response to the representation” [emphasis added].

- 9.5. Footnote 37 cited above refers to the Epping Forest District Council (2017) Report on Site Selection. Prepared by ARUP, and invites the reader to access this information via <http://www.efdclocalplan.org/technical-information/>
- 9.6. Within the introductory text of the Report on Site Selection (2017) referenced by the SA/SEA it is explained, at paragraph 1.2, that the report is incomplete:

“The detailed write-up of the site selection work undertaken in 2017 will be documented in the appendices to this Report. With the exception of Appendices A and D, the remaining appendices were still being finalised at the time of publication. A final, updated version of the Report on Site Selection will be published once the detailed write-up has been completed.”

- 9.7. The SA/SEA makes references to the Report on Site Selection 2017, in respect of the approach taken to selecting sites for residential allocation. However, given the critical appendix is missing from the documentation published under Regulation 19, this fails to justify the rejection of land to the east of Epping Road, Roydon.
- 9.8. We consider this represents a substantial flaw in the Local Plan as currently proposed to be submitted, and one which potentially means that the Local Plan currently fails to comply with the Environmental Assessment of Plans and Programmes Regulations (2004) in its rejection of land to the east of Epping Road, Roydon.
- 9.9. As established through *Cogent Land LLP v Rochford District Council* [2012], defects in the SA/SEA can be cured – it is still possible for a sound and legally compliant Local Plan to be produced. We would urge the Council to revisit its approach to the consideration of land east of Epping Road, Roydon to ensure that such defects are cured.

Other evidence and the site’s sustainability and deliverability

- 9.10. Site assessment work undertaken by the Council appears to have been given substantial weight in decisions to select or reject sites.
- 9.11. Sites SR-0306 and SR-0890 were considered through the Local Plan 2016 site assessment process – an iterative process through which sites are appraised, and rejected or progressed through to further consideration.
- 9.12. Detailed representations were set out at the Regulation 18 consultation stage on the Local Plan, including those setting out our concerns in respect of how the site had been assessed.
- 9.13. Site SR-0306, i.e. Areas A and B combined, was rejected at Stage 2 of the 2016 site assessment process.

- 9.14. The rationale given for this rejection through the 2016 site assessment was that the site is part of a strategic option which was “judged to be a less favourable growth direction”; and “would be most sensitive in Green Belt terms, risking the coalescence of Roydon and Harlow”.
- 9.15. As we noted in our consultation response at the Regulation 18 stage, it was not clear what was meant by “less favourable growth location”. No further clarity has since been provided. It is recognised that the site is not within a proposed strategic growth location for Harlow (Policy SP3). However, this clearly does not make it necessarily unsuitable as a housing location for Roydon. For the reasons set out elsewhere in this representation, Roydon is a sustainable, suitable location for additional homes, and one which national policy encourages a proportion of housing growth to be directed towards.
- 9.16. The Local Plan evidence base includes an assessment of various parcels of lands and how much they contribute towards the purposes of including land in the Green Belt, in the Epping Forest District Green Belt Assessment: Stage 2.
- 9.17. Land east of Epping Road, Roydon is predominantly located within the parcel of land assessed through this as Parcel 064.4. A small portion of the site, in the south-east, is located within Parcel 064.5. Parcel 064.4 incorporates additional land to that which is being promoted at land east of Epping Road, Roydon. The fact that the parcel assessed is not entirely contiguous with the site being promoted is one element of concern.
- 9.18. The Epping Forest District Green Belt Assessment: Stage 2 found that Parcel 064.4 made no contribution to purpose 1 (check the unrestricted sprawl of large built up areas), no contribution to purpose 4 (to preserve the setting and character of the historic towns), and a relatively weak contribution to purpose 2 (prevent neighbouring towns from merging). In respect of purpose 3 (assist in safeguarding the countryside from encroachment) the Epping Forest District Green Belt Assessment: Stage 2 found that it makes a relatively strong contribution, although it does acknowledge that certain elements of this parcel’s contribution are less strong.
- 9.19. A Landscape and Green Belt Assessment was prepared in support of the promotion of land east of Epping Road, Roydon. A copy of this was provided to the Council at the Regulation 18 stage consultation, and is provided here again for completeness as **Appendix 3**. The Landscape and Green Belt Assessment should be given particular weight, as, unlike the Epping Forest District Green Belt Assessment: Stage 2, it specifically considers the site being promoted; and does so in greater detail.
- 9.20. The Landscape and Green Belt Assessment notes that the EFDC Green Belt Stage 1 Review considered various, large parcels of land and provided a broad scale assessment of the District’s existing Green Belt, but at a scale that would not allow for a field-by-field assessment of sites’ contributions to the Green Belt. The Green Belt Assessment prepared in respect of this site and submitted alongside this representation does consider the fields that comprise site SR-0306 / SR-0890 in detail.

- 9.21. In summary, the Landscape and Green Belt Assessment concludes that site SR-0306 (Areas A and B) and the western part of this site which the Council has separately considered as site SR-0890 (Area A) make a low contribution to including land in the Green Belt.
- 9.22. Area A is assessed as making a weak contribution to the five purposes of including land in the Green Belt; and Area B as making a relatively weak contribution.
- 9.23. The Landscape and Green Belt Assessment found that Area A is well enclosed and not visually significant in the wider landscape. Area B is less well enclosed but is still of limited significance in the wider landscape.
- 9.24. Development of site SR-0306 would not risk coalescence of Roydon and Harlow, as clearly demonstrated through the detailed and robust Landscape and Green Belt Assessment,
- 9.25. Further, the Landscape and Green Belt Assessment concludes that Area A in isolation has the potential to accommodate development with little mitigation. Area B would require a higher level of mitigation, but could nevertheless be developed without undermining the purposes of the Green Belt.
- 9.26. Accordingly, the screening out of site SR-0306 through the 2016 site assessment process was unjustified. This error has been compounded by the failure to consider the site in light of information provided through our response to the regulation 18 consultation. There is no evidence that this has been considered.
- 9.27. In respect of site SR-0890 (the western portion of site SR-306), the 2016 site assessment review process concludes that part of the site is suitable, available and achievable for development, and this area is not rejected in the way site-SR0306 as a whole has been. The 2016 site assessment starts by considering the indicative baseline position of 247 dwellings for this site, reduced to a net capacity of 15 dwellings, with the assessment stating that development should be limited to the property fronting Epping Road.
- 9.28. There was no justification for the assertion that development should be limited to the property fronting Epping Road, and the site capacity reduced to 15 dwellings.
- 9.29. The detailed Landscape and Green Belt Assessment which was undertaken in respect of site SR-0306 (including site SR-0890) (Appendix 3 to this representation) identifies that, having regard to landscape impacts and the strategic purposes of the Green Belt, areas Area A and B have net development areas of 3 ha and 4 ha, respectively (see drawing PR-0007 of the Landscape and Green Belt Assessment). Drawing PR 0007 within the submitted Green Belt Assessment provides a landscape led development strategy – informed by the findings of the assessment – which evidences 7 ha of site SR-0306 can be developed without undermining the purposes of the Green Belt. 4 ha of this is within in site SR-0890.

- 9.30. As such, the development capacity of site SR-0890 (Area A) is considerably greater than 15 dwellings. Based on 30 dwellings per hectare, the capacity of SR-0890 (Area A) would be 120 dwellings.
- 9.31. The Landscape and Green Belt Assessment recommends that area Area B (the eastern part of site SR-0306) (be developed at a lower density to Area A. At 20 dwellings per hectare, Area B could accommodate 60 dwellings.
- 9.32. As such, it is clear that, based on a detailed, site-specific assessment of landscape and Green Belt considerations, 180 dwellings could be accommodated on site SR-0306 (Area A and Area B combined).
- 9.33. Sites SR-0306 and SR-0890 are not subject to any environmental, ecological, physical or heritage constraints that would prohibit their development. Detailed work has been undertaken which accompanies this representation that demonstrates that the sites are capable of being developed through a comprehensive, landscape-led development that will not undermine the purposes of including land in the Green Belt.
- 9.34. As confirmed through previous submissions to the Council, an access appraisal has been undertaken which confirms a suitable vehicular access can be provided to the land via Epping Road. An access has been designed and agreed in principle with Essex County Council.
- 9.35. Neither site SR-0306 as a whole, nor the part of the site identified as SR-0890, are subject to any achievability or availability constraints, and are being actively promoted by an established house-builder.
- 9.36. If allocated through the Local Plan SR-0890 / SR-0306 will be able to make a contribution towards meeting the current and acute housing need, helping to address concerns in this respect set out earlier within this representation.
- 9.37. Once Green Belt is considered at a site-specific level, it is clear that site SR-0890 in particular can be developed without undue harm to the Green Belt. Whilst greater mitigation is required in respect of the development of the wider site of SR-0306, this too can be achieved through a Green Belt and landscape led proposal, as demonstrated through the Green Belt Assessment.
- 9.38. The sites and their potential development should be viewed within not only the context of a District-wide need for housing; but also a need to direct additional growth to Roydon.
- 9.39. It is clear that Roydon is a suitable settlement to accommodate growth, and site SR-0306 (in particular the western element of it, identified as site SR-0890) is a suitable site to help meet the District's housing needs.
- 9.40. To clarify, site SR-0890 is deliverable alone. The continued assessment of site SR-0890 separately from SR-0306 through the plan-making process is the most appropriate way of

properly assessing all reasonable alternatives. The assessment of SR-0890 should not be influenced by any conclusions made on the larger SR-0306 site. However, given the District's current acute housing need, the suitability of Roydon to accommodate additional growth, and the deliverability of site SR-0306 through a landscape and Green Belt impact led development (as set out above), allocation of the site SR-0306 would be justified, effective, and consistent with national policy; and would help ensure the Local Plan is positively prepared.

10. P9 – proposed allocation of ROYD.R3

- 10.1. The LPSV proposes allocation of a small part of the site that has been put forward by Croudace Homes for residential development at land east of Epping Road, Roydon as site ROYD.R3.
- 10.2. This proposed allocation is not supported.
- 10.3. The land is not available for development in the form that it is proposed to be allocated by the LPSV. As such, its allocation is not effective.
- 10.4. As set out elsewhere within our representation, 14 dwellings cannot be delivered on the site unless in the form of development that would be of a density vastly exceeding that of the surrounding area, and in the form of development that would be entirely unsympathetic to the existing character of the area (and as such contrary to the NPPF and other proposed policies within the LPSV).
- 10.5. It is noted that within Appendix 6 of the LPSV, the development of site ROYD.R3 is required to be accompanied by establishment of new defensible Green Belt boundaries to the northern, eastern and southern edges of the site, i.e. the site is not contained by existing features that could be used to demarcate the new Green Belt boundary. In such circumstances, we would have to question the justification for the allocation of this site, rather than a different configuration of the land that has been submitted for consideration.