

Planning and Development Control

Local Plan
Regulation 19 Representation
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To whom it may concern

EPHING FOREST LOCAL PLAN – REGULATION 19 REPRESENTATION

Thank you for consulting Harlow Council on the above document. Harlow Council acknowledges the positive and on-going collaborative working with Epping Forest (EFDC) under the duty to cooperate, and through the Harlow and Gilston Garden Town on matters related to strategic cross boundary issues such as housing, employment, the location of future development and infrastructure requirements. In particular, the recognition given to the need for the broader regeneration and growth of Harlow is welcomed. Harlow Council also acknowledges the hard work undertaken by Epping Forest DC in striving to allay Harlow's concerns as expressed in Cllr. Purton's letter of 8 December 2016 and is confident that continued positive cooperation and dialogue will result in mutually satisfactory arrangements.

However, there remain concerns that the transport and infrastructure requirements that are needed to support proposed housing developments around the town are yet to be fully addressed. Harlow Council is cognisant that Epping Forest DC is working hard with Essex County Council to resolve these issues and Harlow Council will continue to support every effort towards speedy resolution. Furthermore there are concerns regarding Epping Forest DC's strategy for employment provision across Epping Forest District and its impact upon the future sustainability of the emerging Harlow and Gilston Garden Town. These concerns, which were also expressed in the Regulation 18 letter sent in December 2016, are set out in more detail in the representation.

**Objectively Assessed Housing Need and Local Plan Target
(Policy SP2)**

The Epping Forest Local Plan refers to a housing requirement of 11,400 homes and table 2.3 in the document suggests provision of 11,382 homes across Epping. Further evidence was prepared in July 2017 which set out the Objectively Assessed Housing Need (OAHN) for the SHMA and individual authorities. This proposed 12,573 homes for Epping Forest in the Plan Period. It is noted that appendix 5 of the Local Plan states that there is a total housing supply of 13,152 homes in the district. This over provision of homes will ensure that the OAHN for Epping is met and additional flexibility made. However it is recommended that the Local Plan be modified to make reference to the new OAHN as set out in the updated evidence base and be more explicit in the housing figure that is to be delivered.

Garden Town Communities (Policies SP4 and SP5)

Garden Town policies SP4 and SP5 are supported and the overall process for delivering Garden Town Communities through masterplans and design codes is endorsed. The Harlow Local Plan includes a similar policy on the provision and delivery of Garden Town communities including Gilston to the north of the town.

Although there is support for the Garden Town communities and whilst Harlow Council is a signatory and supporter of the Memorandum of Understanding (MoU) for Strategic Highways and Transport Infrastructure, there are still concerns relating to the delivery and funding of transport improvements required to bring forward the growth in the Garden Town. A number of Technical Notes have been prepared by Essex County Council and Jacobs which recommend various highway and transport improvements for the network in and immediately around Harlow. Further work is also being carried out to identify sustainable transport corridors which connect Garden Communities to key destinations and transport hubs. However these Technical Notes have not been endorsed or reviewed by the local authorities or the Harlow and Gilston Garden Town Board. Funding is yet to be fully identified and committed for transport schemes and agreement on the phasing and delivery of projects is still to be established. There are still concerns that housing development in the Harlow and Gilston Garden Town could come forward before the necessary transport infrastructure is in place.

It is crucial that the Harlow and Gilston Garden Town Board, which includes Epping Forest District Council, continue to work together to identify the most sustainable transport solutions and the mechanisms for delivering infrastructure prior to residential development coming forward. This will ensure that the existing highway network is not constrained and that the Harlow and Gilston Garden Town will continue towards evolving as a sustainable and accessible place.

Affordable Housing Provision and Distribution (Policy H2)

Following from Harlow Council's response to the Epping Regulation 18 Local Plan consultation, the concerns relating to affordable housing provision across the SHMA and Harlow are still relevant. It is an important consideration for Harlow Council to know where and how Harlow's unmet affordable housing need will be provided. Further work on ways to deliver affordable homes and improve affordability across the Harlow and Gilston Garden Town needs to be undertaken and there needs to be a wider recognition of this issue by the SHMA and the Garden Town authorities in particular. At present the Epping Forest Local Plan and Epping Forest Housing Strategy (October 2017) remain silent on this issue.

Distribution of Employment Needs (Policy E1)

The strategy for distributing employment land in the Epping Forest Local Plan is of concern.

The majority of Epping's employment provision is proposed either in the North Weald area, which has no access to a main railway station or a frequent bus service, together with land north of the A121 in Waltham Abbey. Almost 4,000 dwellings are proposed for the Epping Garden Communities around Harlow with minimal employment provision identified for these sites. Locating employment uses close to residential development and therefore working residents is crucial if the Garden Town is to remain a sustainable place and if it is able to achieve aspirational modal split changes as set out in the Harlow

Local Plan (60% sustainable modes and 40% car) and Epping Forest Local Plan's Garden Town Policy SP4.

Locating jobs at North Weald and Waltham Abbey will result in unsustainable travel to work patterns due to their distance from the majority of residential development being proposed in the Plan and in the case of North Weald, its inaccessibility from public transport, walking and cycling opportunities. Harlow District Council has identified sites for future employment provision but land in Harlow is limited. It is noted that sites around Junction 7 were discounted by Epping Council during the site selection process due to landscape reasons. Sites around Junction 7 would be close to public transport links with access to future sustainable transport corridors and major housing growth and would contribute towards changing the modal split across the Garden Town. It is considered that landscaping can be sensitively planned around any future development.

It is crucial that further technical work is carried out to agree the spatial distribution of employment provision across the Functional Economic Market Area taking into consideration housing distribution, access to transport networks and existing employment areas. Until this work is carried out there is a risk that the proposed employment strategy for Epping will impact upon the sustainability of Harlow and Gilston Garden Town and would impact upon the existing transport network.

Conclusions

This representation sets out a number of concerns relating to transport, affordable housing and employment distribution. Harlow Council is confident, given the positive working relationships and processes currently in place, that further collaborative work will ultimately resolve these issues.

Yours faithfully

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