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For and on behalf of
The Farmers Club Charitable Trust

LOCAL PLAN REPRESENTATION

Land at Paternoster Hill, Waltham Abbey, Essex

Prepared by
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Insert job number and site name
Insert date and issue number
Local Plan Representation

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1.0 INTRODUCTION

- 1.1 This representation is submitted on behalf of The Farmers Club Charitable Trust (the Trust) who own land at Paternoster Hill (the Objection Site), to the north of Waltham Abbey (site plan at **Appendix 1**). They provide comment primarily on the soundness of the plan and the policies contained therein as required by paragraph 182 of the National Planning Policy Framework (the NPPF).
- 1.2 The Trust own the greater part of the Objection Site which currently comprises open and undeveloped grazing land within which lie two small commercial nurseries (glasshouses). The land is bounded to the south by Paternoster Hill and to the south east by the rear of properties in Pick Hill including a residential care home. To the west the boundary is formed by Galley Hill Road, and the boundary of an existing small industrial estate and its northernward extension allocated under Policy WAL.E6. The northern boundary is to open countryside but is well defined by a long established mature tree belt forming a substantial screen from open countryside beyond. The site is divided by the course of Cobbin's Brook which follows the boundary of WAL.E6 and Galley Hill Lane before flowing under Paternoster Hill towards the centre of the town.
- 1.3 The Trust considers that the Plan is fundamentally unsound as published but could be made sound through changes which these representations highlight including, but not solely limited to, increasing the level of housing provision better to reflect an objective assessment of housing need, further alterations to the Green Belt at Waltham Abbey and the allocation of additional land for residential development including land owned and managed by the Trust.
- 1.4 Specifically, these representations examine how the Trust's land has been considered in the preparation of the evidence base, and any justifications based on that evidence for the failure of the Plan to allocate the site.
- 1.5 The Objection Site has previously been identified as suitable, available and deliverable through the SHLAA appraisals prepared by NLP for the Council and in Local Plan representation at Regulation 18 stage in December 2016. The representations outline why the land should be released from the Green Belt to enable a sustainable and logical extension of Waltham Abbey whilst boosting the Council's supply of housing

land in relation to the shortfall in the Objective Assessment of Need for housing and the projected delivery of allocated sites

- 1.6 These representations have therefore considered the Epping Forest Local Plan (EFLP), in relation to its proposed policies and supporting evidence, including that relating to the boundaries of the Green Belt and specific allocations. They also consider the role and function of Waltham Abbey in drawing the conclusion that further growth would be logical and sustainable.
- 1.7 They consequently highlight the need for alterations to the Green Belt and to ensure that such changes are capable of being durable beyond the life of this Plan; that Waltham Abbey is a suitable location to accommodate additional growth required to address a shortfall in provision; and that the Objection Site is suitable and capable of delivery as a means to address the unsoundness of the Plan arising from the foregoing considerations.

2.0 HOUSING AND GROWTH STRATEGY

OAN and the Allocation and Delivery of Housing

- 2.1 It is noted that the EFLP is planning for the delivery of 11,400 new dwellings within the plan period (2011-2033), which is some 518 per annum, based on the evidence in the 2015 SHMA. A Memorandum of Understanding has been agreed for the West Essex and East Hertfordshire Area that each Authority should meet their objectively assessed housing needs within their own boundaries.
- 2.2 The most recent SHMA 2017 does not fully consider the most recent 10 year migration trend; it also unconvincingly reduces the market signal uplift set in the previous SHMA (2015 and 2016 update). Notwithstanding this, the requirement of 518 dwellings per annum is a decrease from the 2017 SHMA which set the OAN at 572 dwellings per annum (which in turn was a decrease from the previous SHMA) without reasonable justification as to why the requirement should be lower than the housing needed, contrary to national guidance.
- 2.3 The Government's Standardised Methodology set out in the recent DCLG consultation identifies the need for 923 dwellings per annum up to 2026. Whilst it is accepted that little weight can be attached to this at the time of this consultation it does reflect both the expected approach to methodology as well as the direction of travel of Government policy and expectation. It highlights the fact that the Council appear to have purposely accelerated the preparation of the EFLP specifically to avoid the potential implications of a significantly higher level of provision, at least in the immediate term.
- 2.4 The starting point for calculating the Objectively Assessed Need (OAN) should be the most recent Government population and household growth projections. In line with the proposed plan period, these suggest that there will be a need for 684 dwellings per annum for Epping between 2011 and 2033. This figure does not make allowances for unmet need from neighbouring authorities, changes to migration and unmet need and demand from London.
- 2.5 It is noted that whilst the original application of a 20% market signals uplift seems reasonable based upon the evidence put forward in the 2015 SHMA no improvements

to the market conditions have been made in the intervening years. Therefore there appears to be no material justification why this has now been reduced.

- 2.6 DLP has analysed the housing need for Epping and has concluded that the OAN should be increased to at least **824 dwellings per annum**. This revised figure takes into account the DCLG 2014 based household projections, reflects that levels of net migration have continued to increase and accounts for the implications of the most recent 10 year migration trend. In addition, as set out in the PINS advisory note to the HMA, it also considered the effect of the most recent 5 year migration period.
- 2.7 When considering the most recent consultation on OAN, this establishes a need figure for **923 dwellings per annum**. The proposed housing requirement of the Plan is significantly below this. We therefore strongly question the robustness of the Council's assessment and the methods used to arrive at the OAN.
- 2.8 Accordingly we consider that the Plan is unsound because the assessment of housing need is not objectively assessed. It therefore fails to provide for a robust level of housing provision which will meet the needs of the district.
- 2.9 Moreover it fails to ensure that the District will be able to demonstrate a five year supply of land on adoption of the Plan.
- 2.10 It is noted in Policy SP5 that the EFLP is seeking to rely heavily on a small number of large scale strategic allocations. The three allocations detailed in Policy SP5 total nearly 4000 dwellings. This inevitably raises issues of delivery, in relation to the potential start dates for such developments in relation to land assembly, infrastructure constraints and infrastructure delivery. The issues and likely timescales in implementing such development allocations are well documents in work commissioned by the HBF and others.
- 2.11 It is important in this context that there is also an adequate supply of sites which are comparatively free from delivery constraints, in single ownerships and which can be implemented in the short to medium term as a means of ensuring that a five year supply of available housing land can be demonstrated and maintained. Moreover it is also important to ensure that development is not over concentrated in a single location

- in this instance in proximity to Harlow, where it could act to adversely affect delivery rates due to market considerations.

2.12 Therefore in order to ensure that an adequate supply of sites can be maintained a greater diversity of opportunity should be provided including a larger allocation of sites elsewhere in the District including at Waltham Abbey.

Waltham Abbey

2.13 It is our view that Waltham Abbey is a suitable location in principle for the allocation of further land to support the function and viability of the town and to meet current and future housing need.

2.14 Waltham Abbey is categorised as a Small District Centre in the EFLP town centre hierarchy. It is noted that a housing provision specifically for Waltham Abbey of 'approximately' 858 is proposed and that seven sites have been identified for allocation to meet this requirement, as detailed in Policy P3.

2.15 Whilst we do not disagree with the Vision for Waltham Abbey we believe that it should put greater emphasis on meeting the housing needs of all who need or would benefit from housing in the town rather than simply referring to the diversity of the population. This is essential if the town is to achieve the diversity that is sought and also to ensure that existing and future housing stress is properly addressed.

2.16 In that respect and having regard to the failure of the Local Plan to meet a justified assessment of housing need across the District, there is no reasonable justification for constraining housing provision to the order of 858 dwellings. Nor is there any evidence which supports the statement in paragraph 5.44, where the capacity for housing development is apparently determined by the assessment of site availability rather than the actual needs of the population for housing.

2.17 Whilst we agree that the most suitable means to accommodate new housing is through the extension of the town on its northern boundary, and that a Strategic Option of Northern Expansion is a "more suitable strategic option", both for the reasons set out at paragraph 5.45 bullet 2, but also in relation to an objective assessment of physical and policy constraints, we do not believe that a justified assessment limits the capacity of

the town to 858 dwellings. This has regard to the actual potential opportunities along the existing northern boundary having regard to an assessment of the role and function of the Green Belt.

Green Belt

- 2.18 The Local Plan identifies the need to alter the Green Belt to meet its development requirements. Any such review should be based on a rational examination of the function that land plays in meeting the objectives of Green Belt policy; and secondly having regard to NPPF paragraph 83, especially the requirement to ensure that once established (or amended) the boundaries are capable of enduring beyond the plan period.
- 2.19 The Plan recognises at 1.44 that one of the key issues to address is that “*there is very little land remaining in the district within the settlements that is not already developed*” and as a result, the Council have undertaken a Green Belt Review.
- 2.20 The EFLP identifies three pieces of key evidence applicable to the review of the Green Belt. These are
- *Green Belt Review (LUC, 2016)*
 - *Settlement Capacity Study (Fregonese Associates, 2016)*
 - *Site Selection Report 2016 and 2017*

Green Belt Review

- 2.21 The Green Belt Review has ranked individual Green Belt sites in terms of their strength and contribution to Green Belt purposes.
- 2.22 However the application of these key pieces of evidence has not been consistent or diligently completed.
- 2.23 The Objection Site was assessed positively in the initial stages of the plan making process (Green Belt Review Stage 1, Sept 15). This document set out assessment criteria in Appendix 1 against the five prescribed functions of the Green Belt. Whilst a coarse grained assessment, at Fig. 18 the document establishes that the general area (annotated as DSR-68) to the north of Waltham Abbey was a broad location suitable

for further more detailed examination.

- 2.24 The Assessment concluded that the purposes of the Green Belt north of Waltham Abbey were generally weak, save for the general function of the policy to prevent urban sprawl. Appendix 2 contains the overall summary leading to the conclusion that the Objection Site has potential capacity for development.
- 2.25 Accordingly a second stage appraisal was carried out by LUC (Green Belt Assessment: Stage 2 August 2016). Parcel 068 was subdivided into 3 parts, land to the east of Galley Hill Road and east of Pick Hill bounded by the northern boundary of the Objection Site comprising Parcel 068.1; the land west of Galley Hill Lane was designated 068.2.
- 2.26 The summary conclusion of this assessment is set out at Table 4.1 where 068.1 is regarded as having a 'Very High' summary of harm on account of a strong function in relation to Purpose 3 – to assist in safeguarding the countryside from encroachment. In contrast 068.2 was rated to have only 'High' harm as it was considered to have a 'relatively strong' rather than a 'strong' impact on Purpose 3.
- 2.27 The terminology and distinction between 'strong' and 'relatively strong' is apparently drawn from the Stage 1 Study (Stage 2 Study paragraph 2.14). The Stage 1 Study was carried out by the Council themselves rather than their Consultants. The scoring table is set out at Figure 3 based on the methodology set out in a Methodology Statement.
- 2.28 This Methodology Statement refers to the measurement categories at 14(i)(c) in respect of the assessment of Green Belt in relation to the function of the land as it *'assists in safeguarding the countryside from encroachment'*. Under (c) however the criteria include only 'strong', 'moderate', 'weak', or 'no' contribution. There is in terms no indication of what 'relatively strong' means or how it was assessed – or in the case of the Objection Site, why it was not assessed as 'relatively strong' where it shares similar characteristics to the land that was subsequently allocated.
- 2.29 Specifically in terms of these criteria, a parcel should be considered to make a 'moderate contribution' (yet another difference in terminology) where:

- The parcel consists predominantly of countryside in use for agriculture
 - The Objection Site comprises agricultural land partly in use for grazing and partly occupied by outworn glasshouses
- It contains a visually significant slope (which may help safeguard the countryside from encroachment)
 - The Objection Site rises from 25m AoD to the south to approximately 30m AoD at its northern boundary – and is therefore comparatively level - beyond which the land rises to Galley Hill at approximately 60m AoD
- Some encroachment (by development) has taken place
 - Permission has been granted for development to the east of Galley Hill Lane (see below) and land is allocated under WAL.E6

2.30 Accordingly our analysis using the Council's own criteria is that the land should objectively be considered to have only a 'moderate' impact. It is therefore wholly unclear why the assessment should draw even slightly contrasting conclusions between 068.1 and 068.2 – particularly when considered in relation to the containment of 068.1 by clearly defined and long established boundary features.

2.31 Nevertheless, the function of Green Belt to restrict sprawl is only one consideration, another being the need to accommodate a level of growth in the town to ensure its ability to perform its designated function throughout the life of the Plan.

2.32 Accordingly land has been allocated in the area of 068.2 comprising Sites WAL.R1, WAL.R2, WAL.R3 and WAL.E6. In addition, land to the north of WAL.E6 is also proposed to be excluded from the Green Belt where planning permission has been granted for four dwellings (EPF/2416/15).

2.33 There is therefore no substantive reason set out in the evidence assessments as to why land comprising the western half of area 068.1 should not also be excluded from the Green Belt – also taking into account the grant of planning permission for the redevelopment for residential purposes of the former Knolly's Nurseries to the east of the Objection Site (Ref: EPF/1161/15). In terms, it would not conflict with any of the five prescribed purposes of designating land as Green Belt and would provide for a logical and defensible boundary to the future Green Belt along a clearly defined and

robust boundary at the foot of Galley Hill.

- 2.34 It is also notable however that paragraph 5.17 of the LUC recommendations advises that there is a need for safeguarded land for development beyond the life of the Plan as there will be unmet housing needs.
- 2.35 There is no apparent reference in the Local Plan to safeguarding land for future development, or to any means whereby the Council can avoid the further review of the Green Belt at the next review of the Local Plan – which will demonstrably be necessary having regard to the significant shortfall in housing provision promulgated by the Plan as published.
- 2.36 Overall therefore, we welcome that the need for Green Belt release is acknowledged by EFDC and that significant allocations in areas currently designated as Green Belt are proposed around the main towns to facilitate their sustainable growth. The Trust support this approach which is essential to the delivery of the new homes and supporting infrastructure needed in the District.
- 2.37 However, the Framework requires that when, in exceptional circumstances, Green Belt boundaries are reviewed, they should be considered with regard to their intended permanence in the longer term so as to avoid the need for future changes at successive reviews of plans. As it stands there is clear evidence that further Green Belt release will be required to meet not only growth in this plan period, but growth beyond the plan period. As such the Trust believe that further amendments need to be made to the Green Belt at this stage to ensure the robustness of their boundaries moving forward, well beyond the horizon of this Local Plan. In failing to do so the Local Plan does not meet the obligations of NPPF paragraph 83.
- 2.38 From a Green Belt perspective, we contend that there is limited justification for the non-allocation of the Objection Site in the plan and no over-riding reason why the Objection Site could not be allocated in a modification to the Plan to meet the additional housing need that we have identified.
- 2.39 Having regard to our contention that the OAN is set artificially and unjustifiably low, additional land will be required to be released from the Green Belt. With regard to the analysis carried out by LUC there is no reasonable justification why all or part of Area

068.1 comprising the Objection Site should not be removed from the Green Belt where demonstrably it would not compromise the principal functions of the designation – nor would it prejudice the likely ability to maintain the proposed new boundary in the longer term.

Site Assessment

2.40 Paragraph 2.66 outlines how the EFLP has taken a sequential approach to delivering housing allocations. Of note in this paragraph is the approach purported to be taken toward the allocation of sites, where it suggests that each settlement was considered and the most appropriate sites were taken forward in accordance with an order of priority which can be summarised as follows::

- *A sequential flood risk assessment;*
- *Previously developed land within settlements;*
- *Sites located on open space within settlements where such selection would maintain adequate open space provision within the settlement;*
- *Previously developed land within the Green Belt;*
- *Greenfield/Green Belt land on the edge of settlements:*
- *Of least value to the Green Belt;*
- *Of greater value to the Green Belt;*
- *Of most value to the Green Belt.*

2.41 To apply such a sequence it is essential that a rigorous analysis of sites is carried out in relation to the criteria. It is our view that the assessments carried out were not rigorous and demonstrably consistent and that, in any case, the evidence provided has been disregarded by the Council in the allocation of sites at Waltham Abbey.

Site Assessments

2.42 A Settlement Capacity Assessment was carried out in 2016. It states at para. 1.3 that it is good planning practice to seek to keep to a minimum the amount of Green Belt land that may be released; therefore it should address the sequence as set out at 2.66 of the Local Plan. The Report in fact confines itself to urban sites and opportunities and looks at the Green Belt only so far as there are brownfield sites which should be a priority for release. As such it demonstrates the need to release land from the Green Belt insofar as it does not identify sufficient realistic development opportunities from within the urban areas to meet even the restricted assessment of housing need.

2.43 The third element of the evidence base underlying the identification of sites is therefore

the site selection exercise carried out by NLP as part of the Strategic Land Availability Assessment 2016 and the Site Selection Report by Arup 2016.

- 2.44 In the NLP Report land at Paternoster Hill is recorded as Site SR-0083 but is noted to be a duplicate entry with site SR-0020 which is regarded as Available, Achievable and Deliverable, noting that part of the site is subject to a flood risk constraint. Capacity is given as 260 dwellings. The NLP Report also refers to the site as having a “*large band through the centre of the site within Flood Risk Zone 3b/3a meaning circa half the site would be unsuitable for housing development*”. The Flood Risk Assessment in Appendix 3 details that far less than 50% of the site is 3a/3b. The capacity would be around 300 dwellings as a result.
- 2.45 The Arup report sets out the stages that were undertaken in site selection as follows:
- Stage 1: Major Policy Constraints
 - Stage 2: Quantitative and Qualitative Assessment
 - Stage 3: Identify Candidate Preferred Sites
 - Stage 4: Deliverability.
- 2.46 Some 57 sites were initially considered in Waltham Abbey with the stated objective being:
- to ensure sufficient sites are considered to provide a sustainable level of housing which supports regeneration of the settlement and (page 19)*
- 2.47 The results of the Stage 1 Assessment are set out in Appendix B1.3 where the Objection Site is given the Reference SR-0020 and was assessed as ‘*entirely or partially unconstrained*’ with the recommendation that it proceed to the next stage. For reference the remaining area of land comprising the balance of Green Belt Area 068.1 was considered separately as Area SR-0332 with the same overall conclusion.
- 2.48 For reference, against the six criteria in the assessment, the only partial constraint is that the site is in part within Flood Zones 2 and 3 along Cobbin’s Brook. It is not constrained by other of the considerations at this level. This was, as noted below, taken into account in the assessment of the potential site capacity.

- 2.49 At Stage 2 the site scored only one 'double negative' – in relation to the loss of best and most versatile land. In many respects, particularly those relating to the sustainability of the location, it either rated neutral or had a positive score.
- 2.50 For comparison the land to the east, referred to as Area SR-0332, scored more double negatives in relation to landscape sensitivity and only one positive, in relation to the accessibility of local employment sites.
- 2.51 The assessment also considered the sites that are proposed to be allocated to the immediate west of Galley Hill Road. In respect of these, there is no material or substantive differences in rating against the chosen criteria. For example, whereas Site 0099 which is proposed to be allocated as WAL.R1 is given a better score in relation to the potential impact on BAP protected species and on Local Wildlife Sites, the Objection Site is rated better in relation to the impact on internationally protected species and on nationally protected sites. Overall, save for the fact that there is no land in Flood Zone 3 in the allocated site, the scoring is indistinguishable between the two areas.
- 2.52 The Site Selection Assessment does not therefore provide any reasonable grounds why the Objection Site should not be allocated at Stage 2.
- 2.53 Arup Appendix B1.5.1 sets out the criteria for the categorisation of sites for further assessment. B1.5.2 then sets out the results of that categorisation.
- 2.54 For the purposes of that document the Objection Site is accorded a capacity of 260 dwellings – which can be noted from the Stage 2 assessment to have regard to site constraints where the unconstrained capacity is given as 560 dwellings. The recommendation is:

This site is in a moderately sustainable location at the edge of Waltham Abbey. It scores poorly against several criteria, including flood risk and landscape impact, but it was felt that it may be possible to overcome these constraints. This site should continue to be considered.

2.55 Notwithstanding that the final recommendation is to continue consideration of the site, as noted, the conclusions in respect of landscape are inconsistent with the Study's own findings at Stage 2. In respect of landscape the Stage 2 Report noted that:

The site falls within an area of medium landscape sensitivity - characteristics of the landscape are resilient to change and able to absorb development without significant character change.

2.56 The conclusion on flood risk was that:

The impact can be mitigated through site layout

2.57 It may be noted also that the Stage 3 recommendation was against allocating Site 0089A which has now been allocated as WAL.R1. Regarding Stage 3 and 4, capacity and delivery, these conclusions are set out in Appendix B1.6.4. However Site 0020 is simply not assessed. Nor, it should be said, is the site which is now proposed to be allocated as WAL.R1 yet Site 0099 is considered capable of overcoming landscape and other constraints notwithstanding that the scoring in Stage 2 is effectively indistinguishable.

2.58 Accordingly there appears to have been no further consideration of the Objection Site. However, patently the evidence base on which the Plan is founded is internally inconsistent in its approach to sites both on their own merits and in relation to their role and contribution to the Green Belt. Moreover it has clearly not been taken as the basis for a logical, justified, approach to site allocations having regard to the inclusion of land which was not taken forward to Stages 3 and 4. It appears possible that the Council have erroneously treated this site as a duplicate and wrongly omitted it from the next stages. For example the Arup Site Selection Report Map dated September 2016 shows the site as neither allocated nor unallocated.

2.59 Although it is acknowledged that the EFLP does not allocate the Objection Site, this representation has set out why this is unsound as it is not based on clear consistent evidence or decision making. The Objection Site should be allocated for residential development of at least 260 dwellings

2.60 Accordingly the whole of the Objection Site including the existing care home and land

to the north-east of the care home should be released from the Green Belt. Even in the event that the land is not allocated now, the removal of the land from the Green Belt now would allow the land to be available to meet future housing needs without the need for a further review of the Green Belt at the next review of the Local Plan.

Deliverability

- 2.61 With regard to the flood risk issue, the Trust commissioned a Flood Risk Assessment conducted by WSP which was submitted to the Local Planning Authority in 2016, attached at **Appendix 2**. This demonstrates that whilst the majority of the site is located within Flood Zone 1 parts are located within the fluvial Flood Zone 3, associated with Cobbin's Brook which runs through the middle of the site but these areas benefit at least in part from the Cobbin's Brook Flood Alleviation Scheme. The Report also concludes that the Flood Zone 2 extent is believed to be conservative as it is based on historical flood events that occurred before the Cobbin's Book Alleviation Scheme was put in place.
- 2.62 Overall therefore it concludes that development could be designed in such a way that risk is mitigated. Among the measures that it proposes is that residential finished floor levels should be 300mm above the 1 in 100 year return period flood water level including an allowance for climate change and that residential development should not be located within Flood Zone 3b. As a precautionary measure it also recommends that a flood warning and evacuation plan is developed, should the final masterplan include any properties within Flood Zones 2 or 3 (defended).
- 2.63 An illustrative Masterplan has been developed on that basis and is attached at **Appendix 1**. This demonstrates the capacity to accommodate development which is not affected by flood risk considerations. The brook will run through the centre of the site, meandering from east to west and will become an accessible natural feature, with dwellings being appropriately set back. The area surrounding the brook will be carefully managed to increase ecology and biodiversity in this immediate area and across the site as a whole.
- 2.64 Having regard to the principles set out on draft Policy SP3, it is considered that development of the Objection Site could be brought forward within the broad objectives established for the delivery of sustainable development which makes the most efficient

use of land.

- 2.65 In the context of these considerations, the Objection Site is demonstrably available for development.
- 2.66 Moreover its development would also provide for a number of material improvements to the local highway network which would materially benefit the delivery of the Objection Site and also other sites allocated in the Local Plan.
- 2.67 As shown in the illustrative Masterplan and Highway Plan at **Appendices 1 and 4**, the provision of a new roundabout on Paternoster Hill is proposed as a means to provide site access. This allows for a connection across the Cobbin's Brook to allow for the realignment of Galley Hill Road and the closure of its existing junction with the principal highway.
- 2.68 This would be a material planning benefit to achieve improved capacity and highway safety in Galley Hill Road.
- 2.69 Galley Hill Road is presently of constricted width from its junction with Paternoster Hill to a point north of the entrance to the site allocated WAL.E6. No part of its length has a public footpath. Galley Hill Road is expected to accommodate additional traffic from the extension of WAL.E6, from the allocation of WAL.E2 to the north, from the provision of an access to WAL.R1 alongside the existing commercial nursery traffic and in respect of the dwellings already granted under EFL/2416/15.
- 2.70 These developments cumulatively will significantly increase traffic on the road, exacerbating the present capacity and highway safety limitations which materially affect the operation of existing businesses using Galley Hill Road as well as the access it provides to communities to the north of Waltham Abbey.
- 2.71 Improvements to the access of Galley Hill Road are necessary to facilitate further development along this road. For example site SR-0060 is identified as having a capacity of 34, which would need considerable improvements to Galley Hill Lane, regardless of consent for 4 replacement dwellings.

- 2.72 It is noted that with respect to the Infrastructure Delivery Plan including the Parts A and B Reports, no reference is made to improvements to Galley Hill Lane albeit that the need for such works is identified in Policy P3 relevant to the greater part of the allocations for Waltham Abbey
- 2.73 Given the presence of Cobbin's Brook the only practical resolution to this issue would be the construction of a new junction as proposed as part of this Objection.
- 2.74 Correspondence was sought with Essex County Council's Strategic Development Engineer in October 2014 who responded that;
- Further to our discussion I can confirm that the principle of a roundabout access at this location would be acceptable subject to it being demonstrated that there would be no safety or capacity issues associated with it.*
- 2.75 Notwithstanding this, no consideration appears to have been given to this in the allocation of any of the sites identified in the Local Plan as published.

3.0 OBJECTIONS TO THE LOCAL PLAN

3.1 Arising from the above considerations it is considered that the Local Plan is unsound in the following respects

Policy SP2

3.2 The OAN for Epping should be increased to at least **824 dwellings per annum**. This revised OAN takes into consideration the DCLG 2014-based starting point and applying a 20% uplift to address worsening market signals. The proposed housing requirement of the Plan is significantly below this. There is no justification for proposing an OAN in the evidence base so significantly below the 2014-starting point. It is not at all clear how this will meet the Governments objective of addressing the housing crisis.

3.1 The delivery strategy is considered to be unsound as it is not considered likely that it will enable the Local Planning Authority to demonstrate a five year supply of land from the adoption of the Plan and for its lifetime.

3.2 Considering the housing need, and the vision of the Plan to increase the vitality and sustainability of Waltham Abbey, further allocations should be made. Paragraph 2.77 identifies that the supply of housing to 2033 exceeds the requirement. Rather than stating this, the plan should actually be preparing for a greater housing need, as identified in the housing need section of this representation. The use of a sequential approach for allocating homes has meant that many suitable, sustainable sites that have not registered as such on a tick box exercise have been missed out of further assessment and ultimate allocation, including the Objection Site.

3.3 Policy SP2 should be amended accordingly to increase the allocation of housing at Waltham Abbey to at least 1120 dwellings.

For the reasons outlined above, DLP submit that Policy SP2 is not sound as it is not justified and will not be effective. The EFLP should plan for a greater housing need and a larger amount of allocations, particularly around areas that are in need of regeneration such as Waltham Abbey and where there is

demonstrable capacity to accommodate a higher level of growth.

Policy SP5

3.4 It is noted in Policy SP5 that the EFLP is seeking to rely on three large scale strategic allocations. The three allocations detailed in Policy SP5 total nearly 4000 dwellings and are all located in relation to Harlow. All will require amendment to existing Green Belt boundaries.

3.5 It is considered that the Local Plan should send a more positive signal about the importance of housing delivery and also seek to ensure that the importance of development to the north of Waltham Abbey is recognised. The allocation of sites to the north of Waltham Abbey including the Objection site should be reflected as a strategic allocation within Policy SP5 as the only sustainable, location for further housing growth within the town, with the fewest constraints and having regard to the importance of planned growth to meet the town's future needs.

For the reasons outlined above, Policy SP5 is not sound as it fails to ensure that sufficient weight is attached to the delivery of a range of development sites across the District which can ensure the continuity of land supply as well as meeting local development objectives and overall housing need. Accordingly the Policy, as drafted is not effective.

Waltham Abbey

3.6 We consider that in the light of the foregoing considerations, the scale and selection of sites for development at Waltham Abbey is not justified or effective having regard to the nature of the evidence base and the interpretation of it arrived at in allocating land. Accordingly the chapter of the Local Plan concerning Waltham abbey should be revisited properly to address the needs of the town and moreover its capacity to accommodate planned sustainable growth.

Policy P3

3.7 We do not object to Policy P3 save that it should be extended to include the allocation of land at Paternoster Hill and such allocation should recognise the pivotal role that the Objection Site should play in delivering sustainable access to allow the implementation

of other allocated sites. In this respect the allocation of sites to the north of Waltham Abbey including the Objection Site should be recognised as a strategic development allocation – see objections to Policy SP5.

3.8 We therefore invite consideration that Policy P3(m) should be extended to include land at Paternoster Hill and that Policy P3(f) is unsound as it makes no reference to the ability to secure such works as are recognised to be necessary to deliver the improvements identified at Policy P3(n)(vii) for which no provision is identified or made in the Infrastructure Delivery Plan but which is fundamental to the implementation of the proposed allocations to the north of the town.

3.9 **Policy P3 is therefore unsound as it does not provide for sufficient development to meet the needs of the community or of the district as a whole and nor does it make sufficient provision to ensure that the development proposed can be implemented. The Policy is therefore unsound as it is not justified and not effective.**



Insert job number and site name
Insert date and issue number
Local Plan Representation

Appendix 1: Land North of Paternoster Hill – Site Plan



Insert job number and site name
Insert date and issue number
Local Plan Representation

Appendix 2: Illustrative Masterplan



Insert job number and site name
Insert date and issue number
Local Plan Representation

Appendix 3: Flood Risk Assessment and Plan



Insert job number and site name
Insert date and issue number
Local Plan Representation

**Appendix 4: URS Technical Note on Site Access
Including Indicative Access Arrangements**

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