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# **EPPING FOREST DISTRICT LOCAL PLAN SUBMISSION VERSION**

# SUPPLEMENTARY CONSULATION RESPONSE

ON BEHALF OF MARTIN GRANT HOMES, PERSIMMON HOMES AND TAYLOR WIMPEY

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### 1. INTRODUCTION

- 1.1 Further to Epping Forest District Council's decision to provide an additional opportunity to comment on the Local Plan Submission Version 2017 and specifically the finalised version of the Site Selection Report and Appendices dated March 2018, we provide a supplementary response to those representations submitted to the Council in January 2018.
- 1.2 Those previous representations dated January 2018 are still relevant and need to be considered as part of the Local Plan process. These supplementary representations relate solely to the changes to the Site Suitability Assessment undertaken for the site at West Katherines dated March 2018 and should be read in conjunction with those previously submitted.
- 1.3 We act on behalf of a consortium of developers comprising Martin Grant Homes, Persimmon Homes and Taylor Wimpey ("the Consortium") who are promoting land making up the northern part of the west of Harlow strategic site now known as 'Water Lane Area'.
- 1.4 Formerly referred to as 'West Katherines', the land under the control of the Consortium (henceforth referred to as 'land north of Water Lane') has now been coupled together with a separate site previously referred to as 'West Sumners' to the south. Combined they form the Water Lane Area which is identified for allocation in the Epping Forest District Local Plan Submission Version.

#### 2. SR-0964-Z - Land to the West of Harlow

- 2.1 This site was assessed in 2016 under the site reference SR-0091. Following the Regulation 18 Draft Local Plan, an updated site boundary was submitted. The updated site boundary was reassessed in the site selection process in 2017 under a new site reference SR-0964-Z in order to record that the site had changed.
- 2.2 This site proceeded through all stages of the site selection process in 2018 and is proposed for allocation in the Local Plan Submission Version for housing as one of the Garden Town Communities.
- 2.3 The difference between the two site suitability assessments carried out for the site relate to potential heritage impact and access to the site. These two additional points were not mentioned in the 2016 Site Suitability Assessment so are addressed below:

#### Heritage Impact

- 2.4 In the 2018 Site Suitability Assessment it is stated that the site is adjacent and partially within the Nazeing and South Roydon Conservation Area. It is noted that there would be impact on the Conservation Area and settings of the scheduled monument to north-east and listed buildings to south. It is advised that there could be possible mitigation through sensitive layout (developing east of the site not west) and high-quality design/materials.
- 2.5 These conservation characteristics have formed the basis of the early master planning for the site. The impact on the Conservation Area is a key factor and the site proposals will be designed to ensure that this is minimised as well as the impact on the existing listed buildings. The inference that the site will only be developed in the eastern part and not the western part is ambiguous and the initial master planning of the site shows that the full extent of the site can be developed with the inclusion of significant areas of open space which ensures that any potential impact on the conservation area is mitigated for. The site will be subject to a Strategic Masterplan process which ensure that these details are addressed adequately.

#### Access to Site

- 2.6 The 2018 Site Suitability Assessment states that suitable access to the site could be from Epping Road, Water Lane and Old House Lane.
- 2.7 The site access has been the subject of initial discussions with Essex County Council Highways and these options listed all form acceptable possibilities. This is not considered to be a constraint and suitable access options were shown in the representations submitted with the Submission Draft Local Plan representations in January 2018 and the West Katherines Concept Framework submitted with those representations.
- 2.8 These additional points in the Site Suitability Assessment 2018 are noted and have been known and addressed during the initial master planning of the site. They will continue to be important factors as the site progresses through the Strategic Masterplan process and as our discussions with the relevant stakeholders continue.

#### EFDC Local Plan Submission Version 2017 - Supplementary Response

#### 3. Summary of Previous Representations

- 3.1 For ease of reference, a summary of our previous representations is below to reiterate our previous points.
- 3.2 We provided comments on the key strategic policies and a selection of general policies from the Local Plan Submission Version. We are encouraged that the Council is committed to working positively and proactively with promoters to deliver sustainable development within the District and the housing market area. Furthermore, we agree that the spatial development strategy, with its emphasis on the development of Garden Town Communities around Harlow including the Water Lane Area is a robust and appropriate strategy. The identification of the Water Lane Area for residential-led mixed use development along with the other Garden Town Communities around Harlow in delivery of housing, employment and infrastructure in the housing market area.
- 3.3 We also highlighted some areas of concern principally relating to strategic sites required to accommodate Traveller sites when standalone sites would be more appropriate.
- 3.4 We are supportive of the Local Plan Submission Version and its allocations, specifically the Water Lane Area for a residential-led mixed use development. At the heart of the planning system is the need to plan for sustainable development, and to significantly boost the supply of housing as set out in the NPPF. We support the findings of AECOM's SSA which robustly demonstrates that land north of Water Lane represents a highly sustainable allocation and will assist the Council in meeting its OAHN.
- 3.5 The publication of the additional Site Selection report and appendices in March 2018 does not alter our position and we continue to support the Council's approach in relation to the identification of this site as an allocation for residential development forming part of the Garden Town Community.