

Epping Forest District Council Representations to the Draft Local Plan Consultation 2016 (Regulation 18)

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Letter or Email Response:

APPENDICES Appendix One - Site Location PLan Appendix Two - Latton Priory Concept Masterplan Appendix Three - Landscape Concept Plan Appendix Four - Broadway Malyan report on Regeneration and Renewal Appendix Five - The Economic Case for Latton Priory by Regeneris Consulting 1. INTRODUCTION 1.1 This representation has been prepared on behalf ofRedacted....in response to the Regulation 18 consultation on the Epping Forest District Local Plan. 1.2 We very much welcome the publication of this draft plan and, overall, we are supportive of its policies, proposals and allocations. We acknowledge that the Council has now made a considerable commitment to the Local Plan process and has devoted its resources to preparing a plan that has a thorough and wide ranging evidence base. We much commend the Council for these efforts and look forward to working constructively through this and subsequent stages of the statutory local plan process. 1.3 We recognise that the Council has confronted many difficulties and complexities in preparing this Plan, not least the high proportion of Green Belt land within the District (at 92% of the land area), the need to work with ten adjoining authorities and to plan for the growth and regeneration of Harlow town at the District's northern boundaries. On the whole these issues have been dealt with thoroughly and competently and we applaud the Council for these efforts. 1.4Redacted....r has been appointed byRedacted.... (the promoters) to act on their behalf in respect of their land interest in the north east of the district to the south of the built edge of Harlow. The site has been promoted through the development plan process since 2005, initially through the East of England Regional Spatial Strategy. A site location plan is attached at Appendix 1. 1.5 The site, referred to in the Regulation 18 consultation version of the Local Plan as Latton Priory, is proposed for allocation through draft Policy SP3. This is considered in further detail later in the representation. We very much support this allocation. 1.6 The Latton Priory site, which has been promoted for a number of years, would involve a mix of land uses, and could potentially deliver up to 2,500 homes and 12-15 hectares of employment land for B-class uses. The most up to date concept masterplan for the site is attached at Appendix 2. 1.7 This representation considers the changes which could be made to improve the Plan in terms of its soundness and justification including an extended development area at the Latton Priory allocation. 1.8Redacted.... both have proven track records in the delivery of sustainable new developments of the highest quality throughout the United Kingdom. Both are committed to the delivery of sustainable new communities. A full consultant team has been appointed to progress technical and environmental issues relating to the future development of the Latton Priory site. It is considered that this evidence base will assist the Council in demonstrating how the Latton Priory site will meet their Objectively Assessed Housing Needs during the plan period. 1.9

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....Redacted.... would like to continue working with the District Council, County Council, key stakeholders and the local community to prepare detailed proposals for the site. Our clients are committed to constructive engagement throughout the promotion of the development.

2. PLANNING POLICY CONTEXT

2.1 This section provides a brief review of the approach which local planning authorities are required to take in preparing Local Plans for their areas, with particular reference to identifying and planning for housing requirements, as well as Green Belt considerations.

2.2 Published in March 2012, the National Planning Policy Framework (NPPF) provides the overarching Government policy document in relation to planning.

2.3 The NPPF requires Local Plans to be "prepared with the objective of contributing to the achievement of sustainable development" (paragraph 151). As such paragraph 154 states that Local Plans "should address the spatial implications of economic, social and environmental change". They should set out "the opportunities for development and clear policies on what will or will not be permitted and where".

Plan making

2.4 In light of the above, these representations will address the draft Local Plan against the provisions of the NPPF. Paragraph 14 states that at the heart of the NPPF is a "presumption in favour of sustainable development", which should be seen as a golden thread running through both plan-making and decision-taking. For plan making this means that:

- Local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
 - ? Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - ? Specific policies in this Framework indicate development should be restricted.

2.5 Paragraph 156 of the NPPF states that local planning authorities should set out the strategic priorities for the area in the Local Plan.

2.6 Paragraph 182 explains that the Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound" - namely that it is:

- Positively prepared - the plan should be prepared 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;
- Justified - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- Effective - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;
- Consistent with national policy - the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

Delivering a wide choice of high quality homes

2.7 With regards to delivering a wide choice of homes and maintaining a supply of housing land, paragraph 47 states that to boost significantly the supply of housing, local planning authorities should:

- Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;
- Identify and update annually a supply of specific deliverable sites sufficient to provide five years? worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;
- Identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;
- For market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target; and
- Set out their own approach to housing density to reflect local circumstances.

2.8 Supporting text at paragraph 47 (footnote 11) states that to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.

2.9 Furthermore, footnote 12 states that to be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.

3. LOCAL PLAN VISION AND OBJECTIVES

3.1 In setting the strategic context for this Plan, emphasis is placed on the Council working with its partner authorities to deliver the vision for the

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London, Stansted Cambridge Corridor (LSCC) Core Area. We support this principle and the key elements of the vision which we see as:

- Complementing and supporting the economic performance of the corridor
- Delivering housing
- Capitalising on existing economic sectors and promoting growth of expanding industries
- Protecting and enhancing the natural environment
- Working with partners to invest in major infrastructure
- The regeneration of existing urban areas

3.2 We particularly welcome the emphasis given to the development and sustainable growth of Greater Harlow in the context of the LSCC Core Area vision.

3.3 We also support the Draft Vision for the District set out on page 30 of the Plan, in particular that "significant residential development will be located near Harlow to support the economic regeneration of the town"

3.4 We support the Draft Plan Objectives on page 31 as an important set of principles to guide the specific policies and proposals of the Plan.

4. SPATIAL STRATEGY (POLICY SP2) Housing Need and Supply

4.1 It is well established that Local Plans should first establish Objectively Assessed Housing Need (OAHN) and then, as a separate process, determine the extent to which that need can be met, consistent with the policies set out within the NPPF. Paragraph 47 of the NPPF is clear that the aim should be to meet the full OAHN as far as is consistent with the NPPF policies.

4.2 There is however some confusion in the Plan and evidence base between these two processes and we would suggest they are dealt with under separate headings (for both the HMA as a whole and for Epping Forest in particular). We consider these two processes below.

Objectively Assessed Housing Need (OAHN)

4.3 The Housing Market Area (HMA) within which Epping Forest District lies, also includes, Harlow, East Hertfordshire and Uttlesford District Councils. The Strategic Housing Market Assessment (SHMA) was published in 2015 and identified a need for 46,100 homes across the HMA. For Epping Forest District this equates to 11,300 new homes over the Local Plan period (2011-2033).

4.4 Since the completion of the 2015 SHMA, but prior to the publication of the draft Regulation 18 Local Plan, revised household and population projections were published (in July 2016). These were the Communities and Local Government 2012 based household projections and the Office for National Statistics 2014 based population projections, which provide the most up to date data.

4.5 SHMA consultants (ORS) have estimated that the impact of the 2014-based Sub-National Population Projections, and 2012-based Household Projections results in an increase in OAN to a figure of 54,600 for the combined HMA authorities, an addition of some 8,000 homes. Although not stated in the Plan or in the Housing Background Paper it is clear from the ORS report: "Updating the Overall Housing Need: Based on 2014-based projections for West Essex & East Herts", that the OAN for Epping Forest District increases to 13,300 dwellings.

4.6 Paragraph 3.34 of the Plan accepts that 54,600 is now the OAN for the HMA but does not acknowledge that the OAN for Epping Forest specifically is now 13,300. We suggest that the Plan be amended to refer explicitly to this figure as the District's up-to-date OAN.

4.7 We note that the OAN figures set out in the 2015 SHMA and the 2016 update, vary from the official household projections and we consider these SHMA figures need to be given some scrutiny as the Plan moves forward to its submission stage and examination.

Capability to Meet the OAHN

4.8 It is apparent from the Plan that the four authorities have carried out an assessment of the potential to accommodate the OAHN figure set out in the 2015 SHMA of 46,100 dwellings and the higher figure of 54,600 dwellings arising from the latest projections.

4.9 We understand that the four authorities, working through the "Co-operation for Sustainable Development Board" carried out a Spatial Options Study. This is not a single report or study as such but a process with three main components:

- Identifying and assessing options for the spatial distribution of OAN across the authorities
- Sustainability Appraisal of these options (carried out byRedacted....)
- A draft Memorandum of Understanding (MoU) between the authorities setting out a high level agreement as to how OAHN should be distributed across the HMA

4.10 This approach to joint working within the Housing Market Assessment is supported and provides a better co-ordinated and more effective approach to plan making within the area.

4.11 The process and output from the Spatial Options Study is reported in the draft Plan, Housing Background Paper and MoU. We understand that the Study assessed 6 options that represented different levels of housing growth and its spatial distribution across the HMA. This resulted in a preferred Spatial Option, which proposed that a maximum of 51,000 homes be provided within the HMA area based on the level of infrastructure constraints as well as environmental and policy designations.

4.12 Before considering the output from the Spatial Options Study, we ask the Council to note that the MoU states at paragraph A4.5 of Appendix 4 that the preferred spatial option "is based broadly upon each local authority meeting its OAN within its own boundaries". That however is not correct as the 51,000 dwellings indicated in the preferred option (and the 11,400 proposed for Epping Forest within this) are below the up-to-date OAN figures of 54,600 for the HMA and 13,300 for Epping Forest.

4.13 It is therefore clear that the proposed 51,000 dwellings for the HMA and 11,400 for Epping Forest are constrained figures below the OAN for these areas. We consider that it would be helpful if the Plan and its evidence base acknowledged this more clearly.

4.14 The difference between the OAN and the level of housing proposed by the study for each authority is set out below. It is clear that there is a shortfall for every authority except

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Harlow where recommended provision is above the OAN. See table in original reps. 4.15 The SA of the spatial options concludes: "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" 4.16 The conclusion that the HMA as a whole and Epping Forest in particular cannot meet their OAHN is an important one which we consider warrants particular scrutiny, especially as it appears to be based primarily on a cap to growth at Harlow dictated by highway capacity constraints. We consider this issue further below. The Principle of Major Growth at Harlow 4.17 We very much support the importance attached to growth at Harlow by the combined authorities for the HMA and the specific recognition given to this by Epping Forest District in the draft Local Plan. This principle is driven by important economic, social and environmental considerations including the urgent need to bring about Harlow's regeneration. 4.18 The strengths, opportunities and challenges of Harlow are well documented. Harlow provides a range of services and facilities as well as housing and employment opportunities. The town has good rail links to London, Stansted Airport and Cambridge. To the east of the town is the M11 motorway which is a key north-south route linking London to Cambridge and beyond. The M25 (3 miles to the south of Harlow) provides access to other parts of London and the wider south east. 4.19 A series of enhancements are planned for the rail link to Harlow. The new rail franchise will deliver a complete replacement of all carriages by 2020. Proposals for 4 tracking into Tottenham Hale could deliver greatly enhanced services by 2025, ahead of the arrival of Crossrail in 2032. The Crossrail 2 Growth Commission set out an ambitious growth projection that would be enabled by Crossrail 2. The Commission interrogated the potential for intensification, as well as the intelligent release of greenbelt and industrial land, as a means to fully capture the benefits of Crossrail 2. 4.20 Harlow has traditionally been a good location for major businesses. Harlow is also home to one of 24 Enterprise Zones set up across England in 2011 to promote business growth and job creation. The Enterprise Zone's aims and objectives reflect wider economic growth aspirations for the town which seeks to boost economic growth, diversify the economic base and to capitalise on the town's proximity to the Cambridge and London economies and connections to rest of the UK and beyond. 4.21 The relocation of Public Health England to Harlow will provide up to 2,750 jobs and, with potential expansion, this figure could reach 3,200. The site becomes fully operational in 2024. The provision of homes, and specifically larger, quality family housing is a concern in this context. 4.22 Harlow experiences a number of challenges, including industrial decline, ageing/inadequate infrastructure, localised deprivation and lower educational attainment. Harlow's town centre and housing require regeneration, the infrastructure needs upgrading and new businesses are required to provide for employment needs. Significant growth will help generate the resources necessary to address these issues. 4.23 Therefore, the principle of growth around Harlow is an essential part of the Local Plan. It represents a logical and effective means of meeting housing need generated in Epping Forest as well addressing the regenerative needs of Harlow and is essential if the Plan is to stand sound against the soundness tests in paragraph 182 of the NPPF. 4.24 In focussing growth at Harlow, the Plan directs development to the most sustainable location in the district, where it is most needed and where there is the greatest capacity to accommodate new development. In spatial planning terms, this provides a pattern of development which relates to the largest existing urban area. 4.25 Paragraph 30 of the NPPF makes clear that local planning authorities should support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport. Development adjoining Harlow that is well related to the existing urban area is clearly an effective means of meeting this requirement. 4.26 This all suggests that growth at Harlow should be maximised. However, the amount of development allocated to Harlow in the draft Plan is based on background work that suggests limits to Harlow's growth. Given the compelling reasons set out above for concentrating growth at Harlow, this warrants particular scrutiny. We consider this issue further below. A Limit to Growth at Harlow? 4.27 The SA of the spatial options states: "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." This refers to the conclusion that the limit to growth at Harlow is 16,100 dwellings (within the Epping Forest, East Hertfordshire and Harlow Council administrative areas). 4.28 We consider that this suggested limit to growth at Harlow is a key consideration within the Plan as it is the reason why Epping Forest Local Plan falls some 3,000 short of the housing supply necessary to meet its OAN. It also places a cap on the proportion of the Epping Forest housing requirement that can be accommodated on sites within the District adjoining Harlow, so putting pressure on other settlements within the District. Further, as indicated above it limits the social, economic and environmental advantages of growth at Harlow. 4.29 We consider that the distribution of development between the Harlow fringes and the main settlements of Epping Forest warrants further examination. A consideration in this regard is the questionable availability of a number of the non-Harlow allocations (e.g. St Margaret's Hospital in Epping). We also feel that the most of the settlement edge sites

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in the district are assessed at too high a density. We are also concerned as to whether the North Weald allocation is a sustainable response to locating housing given issues regarding public transport links to higher order centres. Also a number of the sites allocated are not suitable given ongoing existing uses which have a policy presumption to protection (e.g. leisure centre sites). 4.30 It would appear that highway constraints are the principal reason for this limit on the growth of Harlow within the Plan period. With the extensive highways improvements proposed, including additional capacity at M11 junction 7 and a new junction 7A, we have some concern that this is not a sound reason to place a ceiling on growth at Harlow within the Plan period, and propose that this matter be considered further before the Regulation 19 version of the Plan is published. 4.31 We are aware, in particular, that the potential to provide north-south and east-west transport corridors may depend on the housing capacity of the strategic allocations and of Latton Priory in particular (see our comments on this issue in Section 5 below under the sub headings Housing Capacity and Transport and Accessibility). Housing Supply 4.32 Epping Forest's most recently published 5 year assessment of land supply covers the period 2016 to 2021. The housing land supply for Epping Forest continues to be measured against the housing targets set out in the defunct east of England Regional Plan, which was removed some years ago. It is considered that this approach is inappropriate and the Council should be using the figures set out within the published strategic Housing Market Assessment to base their housing land supply calculations upon. 4.33 The annual target based upon the level of development proposed in the Plan is 518 dwellings. This figure should be adopted as the basis for the housing requirement against which the availability of a 5-year supply is to be judged, subject to further assessment. The plan period is 2011-2033 and covers 22 years. 4.34 We note that Appendix 5 of the Plan (Housing and Traveller Trajectories) includes a footnote to the effect that a 5% buffer is applied to the first five years of the Plan period in accordance with the NPPF requirement. We consider that the rate of housing provision in Epping Forest constitutes persistent under delivery and warrants the application of a 20% buffer as specified in NPPF paragraph 47. 4.35 The Council has yet to provide a housing land supply calculation which uses the SHMA figures, or one which takes into account the emerging allocations. Whilst sites identified in a Regulation 18 stage version of a Local Plan may not ordinarily be taken forward into a Council's assessment of five year housing land supply, the third recommendation at the Council meeting which approved the plan for public consultation also concluded. „That the Draft Local Plan be endorsed as a material consideration to be used in the determination of planning applications and enforcement decisions in accordance with paragraph 216 of the National Planning Policy Framework.? 4.36 This recommendation would lend support to the inclusion of the proposed strategic allocations within the Epping Forest District Local Plan in a calculation of housing land supply. Employment 4.37 Policy SP2 refers to the delivery of approximately 10,000 new jobs through the plan period. The background paper on Economy which the Council has published alongside its consultation on the emerging EFDC Local Plan refers to an annual job based requirement of 400-455 jobs (drawn from theRedacted.... analysis). 4.38 Although the Council has chosen to make provision at the higher end of the range specified by their consultantsRedacted.... (455 jobs p.a. and 10,000 jobs overall) we note that this provision is lower than the previous assessment of the East of England Forecasting Model (which suggested 470 jobs p.a.). We understand that the lower range specified byRedacted.... is attributed to "growth at Stansted drawing labour and economic activity away from other parts of the sub region, including from Epping Forest District." We consider this assumption warrants further scrutiny given that Epping Forest is sufficiently close to Stansted to benefit from its growth and because Epping Forest has the locational advantages of proximity to London and the M25 /M11 junction. 4.39 We question the approach to delivering employment land set out in paragraph 3.60 of the Plan which suggests a priority to retain, enhance and renew existing employment sites as first priority and only then allocating additional sites as required. This is reflected in the sequence of priorities for delivering employment land set out in Policy SP2. 4.40 We also feel there is too much emphasis on existing policy constraints to the delivery of new employment land. We consider more emphasis should be given to the employment land opportunities presented by the strategic sites around Harlow. This will ensure a closer integration of new housing with new employment in the most accessible and marketable locations for new employment within the District. 4.41 We would like to see more emphasis on the third principle for delivering new jobs in Policy SP2 i.e.: Allocating new employment space at the strategic allocations to contribute to meeting the economic needs of the wider sub region and complement Harlow Enterprise Zone. 4.42 We suggest that Policy SP2, along with Policy SP3 and Policy E1, specifically recognise and give priority to the provision of new accessible and highly marketable employment land as part of the strategic allocations around Harlow, particularly at locations with the best access to the motorway network 4.43 We consider this issue further below in the context of Policy E1 below.

5. STRATEGIC ALLOCATIONS AROUND HARLOW (POLICY SP3)

Introduction

5.1 We endorse the principle of four strategic development allocations around Harlow as proposed by Policy SP3. This is an effective

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response to the clear priority established by the Co-operation for Sustainable Development Member Board (the Coop Member Board) to concentrate growth at Harlow to meet all the objectives we have summarised in section 4 above. 5.2 We set out below, first our overall response to the Policy as currently drafted under the heading "SP3.1 Latton Priory - Response to policy principles". 5.3 The heading "SP3.1 Latton Priory -Redacted.... Land Proposals" then provides a summary of our plans for the site before considering the fundamental site elements and proposals under a series of subheadings which are: Green Belt, Landscape, Housing capacity, Strategic Employment Land, Regeneration and Renewal, Transport and Infrastructure, Ecology (including SANG), Green Infrastructure, Heritage, Phasing and Delivery and the Needs of Travellers.

5.4 The key points we will make concern the housing capacity/ land area of the allocation and its potential to provide a strategic employment site, where we put forward proposals to strengthen and diversify the allocation to help meet the Plan?s overall vision and objectives.

Allocation SP 3.1 Latton Priory -Response to policy principles

5.5 Our clients,Redacted...., have promoted the land at Latton Priory for a strategic mixed use development for well over 10 years. We very much support and endorse the principle of its allocation in Policy SP 3.

5.6 We are concerned that site reference SP3.1 links the delivery of Latton Priory with that of Riddings Lane. This could complicate and delay delivery at these locations as the two sites are in separate ownerships and radically different in scale. It is clear that Latton Priory is a strategic scale development allocation whereas Riddings Lane is not of this scale or significance. We therefore consider they should form separate, albeit geographically related allocations. The single ownership status of Latton Priory is an important asset in terms of early delivery. Adding a small parcel of land in separate ownership would undoubtedly complicate the planning and development process. We therefore suggest that Riddings Lane be removed from Policy SP 3 and allocated separately.

5.7 The development of land at Latton Priory is not linked to the development of land at Riddings Lane and it is not considered that it would be appropriate for the two areas to be combined for the purposes of fulfilling any requirement to produce a Strategic Masterplan.

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5.8 We endorse sub paragraph B of Policy SP 3 and its requirement for an appropriate level of employment, retail and community uses, together with the necessary highways and transport infrastructure, schools, health, open space and green infrastructure. We very much support the principle that the strategic allocations "must be planned and delivered as high quality, integrated, sustainable and distinctive development supported by necessary infrastructure, services and facilities."

5.9 We support sub paragraph D of Policy SP 3 and its requirement that infrastructure requirements must be delivered at a rate and scale to meet the needs that arise from the development in accordance with the Infrastructure Delivery Plan (IDP). We also recognise that the development will be expected to make a contribution proportionate to its scale and impact for the delivery of improvements to the capacity of the strategic highway network and other strategic infrastructure requirements.

5.10 The Plan?s proposals to "front load" the planning process, under sub paragraph E of Policy SP 3, are well considered and constructive. We endorse in particular the proposals for a strategic masterplan produced by the applicant in partnership with the Council and relevant stakeholders as stated in the policy i.e. "to ensure a comprehensive, joined up and cohesive approach is taken to the planning and delivery of high quality development and associated infrastructure".

5.11 We support sub paragraph F of Policy SP 3 and the principle that the strategic allocations must reflect and demonstrate that the place shaping principles set out in Policy SP4 have been adhered to (subject to our suggestions on matters of detail in our response to that policy below).

5.12 We note the requirement to provide accommodation for travellers on the site as set out in sub paragraph C of Policy SP 3 and have made comments and suggestions under the relevant sub heading below.

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5.13 We set out further and more detailed comments and suggestions for the content of the Policy under the following sub heading.

SP3.1 Latton Priory -Redacted....Land Proposals

5.14 We have prepared a detailed and extensive evidence base for the Latton Priory site to underpin our proposals which essentially consist of the following elements:

- 2,500 new homes
- 2,440 new jobs
- 8 acres of new sports provision
- 150 acres of new accessible green space
- £180 million of private sector investment
- 1km of new cycleways

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- Investment in improvements to the strategic highway network and local road improvements

5.15 The vision for the site is as follows;

"Latton Priory will become a vibrant new community, with a comprehensive housing mix, set amongst abundant green spaces using the Garden Suburb principles, as well as incorporating community services and facilities to benefit both new and existing residents.

The development also aims to create 2,500 new jobs on a high quality office park.

Strategically located adjacent to Junction 7 of the M11 and Harlow's southern edge, Latton Priory will be developed to integrate with Harlow's existing estates to encourage regeneration and provide an extended Green Wedge. The development can deliver up to 2,500 new homes including affordable housing, shops, health facilities, schools, extensive public open space including sports pitches, new pedestrian and cycle routes, as well as bus services into Epping and Harlow and local highway improvements."

Green Belt

5.16 We have reviewed the Council's Stage 1 and Stage 2 Green Belt assessments. The Latton Priory site falls within the broad parcel DSR 073 identified for the Stage 1 assessment. This parcel is not uniform in its characteristics and contains areas of land that are fundamentally different in terms of landscape form, topography and defining characteristics. For this reason the overall assessment against Green Belt purposes is not informative in identifying areas for potential Green Belt release as it includes areas that are very effective, as well as areas that are much less effective, in serving a Green Belt purpose.

5.17 For the Stage 2 assessment a number of sub parcels of DSR 073 are defined that include areas defined by the Council and by our clients as suitable for development, namely parcels 073.1, 073.2 and 073.3.

5.18 In the case of parcels 073.1 and 073.2, the Stage 2 assessment records overall harm (if these parcels were developed) as "very high". In the case of parcel 073.3, the assessment records "high". It is however important to note that these judgements are based on these parcels having a strong performance against only the 1st Green Belt Purpose "to check the unrestricted sprawl of large built up areas". The assessment against the 2nd and 4th purposes for all three parcels is "no contribution" and only a moderate contribution is indicated for the 3rd purpose.

5.19 In this respect we question the methodology of the Stage 2 assessment in indicating a "very high" harm rating when only one Green Belt purpose is materially affected.

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5.20 Further, the stage 2 assessment criteria do not allow the topography to be taken into consideration in the judgement as to whether the parcel contributes to Purpose 1 "to check the unrestricted sprawl of large built up areas". Parcels 073.1, 073.2 and 073.3 (as well as some of the land within the wider parcel 073.5) fall within the Harlow landscape bowl and the "ridge line" that defines and contains this area. This topography does effectively restrict the sprawl of Harlow and needs to be considered in making judgements about these parcels against the 1st Green Belt purpose.

5.21 We also note from Appendix A: "Residential and Employment Site Selection Methodology" accompanying the report on site selection byRedacted.... that the third Green Belt purpose "to assist in safeguarding the countryside from encroachment" is not applied in the site selection process employed for non-Harlow sites. However, it would appear that this Green Belt purpose has been applied to the selection of Harlow sites and would be grateful for some clarification regarding any inconsistency of approach on this point.

5.22 We have carried out our own assessment of the area we consider developable at Latton Priory against Green Belt purposes (see concept masterplan at Appendix 2) This forms Chapter 6 of a report commissioned byRedacted....: "Landscape and visual study - A vision for a Green Infrastructure Future by FPCR" Dec 2013 (The fpcr study). The results of this study for the Latton Priory site are summarised below.

Green Belt purpose Assessment

1. Check the unrestricted sprawl of large built-up areas Landform and significant blocks of woodland provide natural containment and strong defensible boundaries to sprawl, subject to capacity limits
2. Prevent neighbouring towns from merging No settlement coalescence issues
3. Assist in safeguarding the countryside from encroachment Limited areas of land contained within landform adjacent to the settlement edge. Areas close to settlement edge are fragmented and separated from open countryside by landform and woodland blocks
4. Preserve the setting and special character of historic towns Areas of land orientated towards Harlow form part of the Harlow context presenting a wooded skyline setting in views from elevated properties at the town centre. However, the containment function of the wooded skyline can be preserved.
5. To assist in urban regeneration by encouraging the recycling of derelict and Southern estates adjoining development have been identified for regeneration (we acknowledge that regeneration is a benefit of

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other urban land the development proposals rather than a Green Belt purpose of the existing land but it is nevertheless an important consideration)

5.23 We therefore conclude that the Council's Green Belt study tends to over emphasize the Green Belt purpose of land within parcels 073.1, 073.2 and 073.3, and in part 073.5. Our own assessment, that was made more specifically in relation to a development area defined and limited by the topography, indicates that this area, for the most part, does not fulfil Green Belt purposes.

Landscape

5.24 We consider that the characteristics of the landscape at Latton Priory support the principle of development, determine the capacity of the site and how the Green Belt boundary can be realigned to protect its essential integrity and purposes.

5.25 The landscape evidence demonstrates that Latton Priory can create a logical and defensible Green Belt boundary realignment based on the landform and natural features in the landscape. It also provides an opportunity to extend Harlow's southern Green Wedge into the site.

5.26 The fpcr study seeks to define a new robust Green Belt boundary that will provide effective landscape containment of new development with no encroachment on Harlow's wider landscape setting. It shows how around 75

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hectares of future built development will be encompassed and subdivided by 175 hectares of accessible green infrastructure. Key findings are:

- Development can be confined to limited areas of land contained within the landform adjacent to the settlement edge (safeguarding the countryside from encroachment).
- Development will utilise land orientated towards Harlow and can be designed to preserve the setting and character of Harlow as defined by Frederick Gibberd.
- The landform and blocks of woodland provide natural containment and strong defensible boundaries to check unrestricted sprawl.
- There is no possibility that development would lead to neighbouring settlements coalescing or settlements merging into one another.
- Development will be linked with the Harlow southern estates and the new Green Belt boundary will help meet the Green Belt purpose of assisting urban regeneration

There is the opportunity to enhance the landscape through Green Infrastructure that will provide east-west links between the housing and employment areas and a robust definition of the development's southern limits.

5.27 We note that the "Harlow Strategic Site Assessment"Redacted.... in its assessment of Latton Priory states:

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"Analysis fromRedacted.... landscape specialists (see Appendix 2) found that the plateau at the top of the ridge should not be developed, as this would have the potential to result in significant effects on the local landscape and views. New development should therefore be set down on the northern side of the ridge, such that the roof line is below the top of the plateau. This would allow space to substantially strengthen the woodland on the southern edge of the ridge in order to lessen the visual impact of the development from Harlow and from the rural area within Epping Forest District. This would also create opportunities for further green infrastructure improvements linking the proposed development and Harlow more generally with the wider landscape."

5.28 We agree with these conclusions but our landscape assessments define a larger development area within these considerations and therefore a greater capacity for housing at the site of some 2,500 dwellings (see Appendix 2 concept masterplan and development areas).

5.29Redacted.... have now commissioned an updated assessment from consultantsRedacted.... and their landscape concept plan forms Appendix 3 to these representations.

Housing Capacity

5.30 TheRedacted.... report depicts development areas for each of the draft allocations, including Latton Priory. We have reviewed the area shown in that report and consider that it can deliver 1553 dwellings within the proposed strategic allocation areas, based on 35 dph, although this density could be increased. Notably, the allocation areas within neighbourhood 1 (the area to the west of the green wedge) would deliver 1000 dwellings.

5.31 Further, as indicated above, we consider that the development area can be extended further south and east (as shown on the concept Masterplan at Appendix 2) without encroaching upon the development plateau and can be effectively contained within the landform and tree belts, augmented by additional planting.

5.32 The identification of further housing capacity at Latton Priory should be considered in the context of the delivery of the proposed north-south sustainable transport corridor.

5.33 TheRedacted.... report states "Delivery of ~1,000 units has been assumed for this site in this report reflecting the landscape constraints encountered, but this lower level of growth may adversely affect the potential to establish a sustainable transport corridor linking to the Town Centre and sites to the north, and to limit impact on the local road network."

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5.34 We would suggest that the precise extent of the development area be subject to further discussion with Council officers, as part of the joint Development Forum and masterplanning process.

5.35 It should also be noted that our proposals include a strategic employment area (again shown on the concept masterplan at Appendix 2) to the east of the residential area adjoining London Road. Our proposals for that area are discussed below under the heading "Strategic Employment Land".

Strategic Employment Land

5.36 Policy SP 2C(iii) refers to "allocating new employment space at the strategic allocations to contribute to meeting the economic needs of the wider sub region and complement Harlow Enterprise Zone"

5.37 We have suggested in paragraphs 4.37 and 4.38 above, that there should be more explicit emphasis and commitment to this principle in both Policy SP2 and Policy SP3.

5.38 Although Policy SP3 B refers to sites SP3.1 to 3.4 making provision for an "appropriate level of employment, retail and community uses" this suggests limited ancillary, supporting provision rather than substantive allocations of employment land. We would like to see specific allocations for employment land within Policy SP3 in addition to the provision of a minimum of 3,900 homes.

5.39 We note from the Economy and Town Centres Background Paper (BGP6) that there are important qualitative and deliverability requirements in relation to meeting employment requirements.

5.40 Paragraph 1.21 of BGP6 refers to a gross demand for up to 13 hectares of B1a (offices). It states this could be met within current policy but notes that much of the potential supply may not be deliverable (due to factors such as unknown ownership and contamination). It goes on to state that "there is significant potential land outside current policy".

5.41 BGP6 paragraph 1.22 then refers to Use Classes B1b, B1c, B2 and B8 (industrial and warehousing) noting a projected decrease in employment, but still a demand for up to 18 hectares of land, due to replacement demand and the need for choice in the market. This could be met within current policy, although as with B1a (offices) above, according to the analysis undertaken in the SLAA, much of the potential supply may not be deliverable.

5.42 In relation to Policy SP2 and its supporting text, we have questioned above the approach to delivering employment land set out in paragraph 3.60 of the Plan. This suggests a priority to retain, enhance and renew existing employment sites as first priority and only then allocating additional sites as required.

5.43 We have also stated, in relation to Policy SP2 above, that there is too much emphasis on existing policy constraints to the delivery of new employment land. We consider more emphasis should be given to the employment land opportunities presented by the strategic sites around Harlow. This will ensure a closer integration of new housing with new employment in the most accessible and marketable locations for new employment within the District.

5.44 We consider that all these considerations strongly indicate a need for allocations of strategic employment land.

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Allocation of Employment Land at Site SP3.1 (Latton Priory)

5.45 In the case of the strategic allocations around Harlow, the employment component could be determined on a proportional basis directly related to the quantum of residential development. Such an approach however would not reflect the unique opportunities presented by the Latton Priory site to contribute towards Epping Forest's employment requirement

5.46 Our Client's site which has been promoted for a number of years would involve a mix of land uses, and could potentially deliver 12-15 hectares of employment land for B-class uses. The most up to date masterplan for the site is attached at Appendix 2.

5.47 We have compiled evidence base documents to demonstrate the benefits of development to the south of Harlow. All these documents were submitted toRedacted.... to inform their site selection work for the Council.

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5.48 The potential of the Latton Priory site should be viewed in the context of its location as well as its capacity. This is because the location of Latton Priory provides a unique opportunity to provide employment land close to existing services and facilities as part of a mixed use sustainable urban extension. It is also well positioned in terms of its transport links, both existing and planned. The site is uniquely placed in relation to the strategic highway network and the programmed improvements to Junction 7 of the M11 will consolidate that advantage.

5.49Redacted....commissioned work fromRedacted.... to assess the economic case for development at Latton Priory. TheRedacted.... report (September 2013): "The Economic Case for Latton Priory", attached at Appendix 5, demonstrates that development at Latton Priory can:

- Deliver the major proportion of the employment land required to meet the growth in jobs (up to 15ha)
- Meet approximately 55% of the jobs growth target identified through the previous Local Plan consultation with direct on site jobs (approximately 2,170 Full Time Equivalent positions)
- Reduce out-commuting and diversify the employment offer of both Harlow and Epping Forest Districts
- Provide higher value business accommodation associated with direct access to the M11
- Provide development of sufficient scale to ensure sustainability with provision of jobs, homes, shops and services in one location
- Generate additional expenditure to support the viability of local shops and services to assist the regeneration of South Harlow
- Provide £26.5 million in New Homes Bonus Payments and £4.1 million per annum in Council Tax payments
- Generate approximately £2.0 million in business rate revenue per annum for the local authority.

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5.50Redacted....also commissioned Employment Market Demand Advice fromRedacted.... in February 2014. This is an assessment of the business park market in the M11 and West Essex sub-region. It demonstrates that Latton Priory offers an unrivalled location for a large employment allocation with strong transport links and would place Harlow/Epping Forest in a strong position in the wider market. The report suggests the site is a solution to the loss of potential occupier investment and jobs through the lack of suitable allocated employment sites at Harlow / Epping Forest.

5.51 The report concludes:

"There are not the right sites appropriately allocated in the local area to attract large scale occupiers that will foster economic growth- both in the shorter term and to capture the growth anticipated in the longer term. Allocating Latton Priory for employment uses now (alongside housing) would put the Council „ahead of the field? and more likely to attract a wider spectrum of potential occupiers because of the constrained supply forcing occupiers to look wider."

"..... the advantages of the site could be used to strengthen the economy of Epping Forest and Harlow. Without such an allocation, and with a dearth of other appropriate sites, the growing inward investment anticipated to be considering the area and the wider M11 corridor over the coming years is only likely to go elsewhere."

Regeneration and Renewal

5.52 The regeneration benefits of the Latton Priory site are acknowledged by theRedacted.... report. This states, as part of its assessment of the site that: "The scale of site and adjacency to deprived areas in southern Harlow, despite the fact that the site is not itself in an area of high deprivation, combine to indicate that development would have regeneration benefits".

5.53 TheRedacted.... report then notes: "The site covers Decile 1 in barriers in access to housing and services; therefore, development of the site would have a strong positive impact on this criterion, given its proposed scale. The scale of the site will in itself have strong positive economic impact, potentially transformative for southern Harlow if appropriately integrated."

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5.54 We consider that these benefits are a key part of the justification for the site's allocation and serve the Vision for the LSCC to regenerate the existing urban area of Harlow and the Plan's vision of locating significant residential development near Harlow to support the economic regeneration of the town.

5.55 South Harlow includes a number of neighbourhoods that suffer from severe deprivation with the greatest concentration of challenged neighbourhoods in the town. The promoters of Latton Priory,Redacted...., commissioned a report fromRedacted.... entitled "South Harlow Regeneration & Renewal - Latton Priory's approach", Dec 2014 (Appendix 4). This document shows how Latton Priory can assist the regeneration of South Harlow through a range of possible initiatives including:

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- Providing economic benefits based on increased resident expenditure and patronage of existing shops and services due to the proximity of the new development to the existing urban area
- New investment in public transport, highways, community facilities, infrastructure, open space and public realm, so adding diversity and improving the range and quality of facilities within 5 to 10 minutes' walk of the southern estates
- Improvements to existing facilities including better access to an extended southern green wedge, improved public car parking, new bus stops / routes, better access to existing schools and improved management of open spaces
- Diversifying the housing offer in terms of type and tenure in relation to that provided in the Southern Estates
- Neighbourhood renewal programmes integrated with the masterplanning process including improvements to footpaths, street lighting, public transport, parks, landscaping, sports and recreation
- Further improving the environment of the existing estates through new landscaping, trees, better road and pavement surfaces, improvements to buildings
- Creation of new jobs through the proposed strategic employment area

5.56 The proximity of Latton Priory to the Priority Estates and Modern Homes Programme Estates provides an opportunity to link and integrate the two physically and promote a joint forward planning process. This is a particular opportunity presented by the Latton Priory site that is not evident with other proposals that are more distant or less well integrated with the existing urban area.

5.57 The regeneration and renewal document sets out specific regeneration initiatives informed by a survey of residents living in the southern estates.

5.58 The promoters of Latton Priory propose to discuss these regeneration initiatives through the joint Development Forum and masterplanning process proposed by Policy SP 3(E).

Transport and Infrastructure

5.59 We note the conclusions of theRedacted.... report with regard to transport and accessibility at Latton Priory. The Site assessment states:

"Significant potential exists to mitigate trip generation at the site through promotion of sustainable modes and wider network impacts through the implementation of physical mitigation measures e.g. potential for a sustainable transport corridor linking Site A and M exists through the green wedge. The site is relatively well located for schools, employment, bus stops, footpaths and the strategic road network"

5.60 To demonstrate that Latton Priory can deliver both a viable and sustainable transport solution,Redacted.... have previously completed a detailed Transport Study to assess the site.

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5.61 The Transport Study assumed up to 2,500 residential units on the Latton Priory Site, which ensures the higher limit of housing could be accommodated. Furthermore, a range of secondary developments had been included to

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ensure that the cumulative effect of development delivery had been taken into account. The assessment presented therefore accounted for a worst case scenario.

5.62 The modelling had been guided by the use of the Essex County Council (ECC) Saturn model. This ensured consistency with other studies being carried out at the time. Detailed discussions have occurred with ECC over recent years to agree the modelling approach. This has included agreement to several fundamental elements of the assessment.

5.63 The results of the assessment demonstrate that the development at Latton Priory can be delivered, and together with the improvements at Junction 7, will bring benefit and newly released capacity to the operation of the wider network. In recent time, Highways England have confirmed a significant improvement to Junction 7 through securing a £50M funding grant specifically to tackle increased congestion at this area.

5.64 It is noted that Essex County Council are currently upgrading their Saturn model to a town- wide Paramics model. We seek to validate our previous modelling exercise with this paramics model in due course to provide a final confirmation to the acceptability of our results.

Improvements to strategic highway network

5.65 A range of robust highway improvements has been identified that will ensure that Latton Priory can be delivered with a nil detriment to the existing network, and prior to the delivery of proposed Junction 7a, such that the road network will still operate within acceptable limits.

5.66 As well as Junction 7, those junctions most likely to be effected by the Latton Priory site, as defined by Essex County Council, had been assessed. The result of this assessment indicated that the junctions primarily along Southern Way, including the junction with the A414, will need to be improved.

5.67 The proposed improvements along the Southern Way corridor include the signalisation of the majority of junctions assessed. The identified interventions will deliver a better than nil- detriment solution.

5.68 Through discussions with Essex County Council, a study has been carried out that investigates Southern Way. This includes downgrading the highway corridor with the option to reduce the road classification to a „B? road. The proposed conversion of the junctions into signal controlled could reinforce the reduced importance of Southern Way. This strategy requires further consultation and agreement with Essex County Council.

Access to the Site

5.69 In respect of an access strategy, three points of access will be delivered in a phased approach. The site is strategically well placed to gain access from a number of locations on the local highway network. However, it is considered that the most appropriate vehicular points of access are:

- Rye Hill Road
- B1393 London Road
- Fern Hill Lane

5.70 These roads have been reviewed fully against national design standards to ensure that suitable access can be gained. The access strategy has identified the improvements that are necessary which is likely to include localised road widening. This will ensure that the routes into the site are suitable for the level of traffic predicted. This will also ensure suitable access for public transport vehicles which is fundamental for the delivery of a sustainable development.

5.71 Each point of access is discussed below:

5.72 Rye Hill Road: located off Paringdon Road, has a footway along its western kerb line for the first kilometre. South of this point, the proposed upgrade of Rye Hill Road will be able to provide a footpath on both sides of the carriageway.

5.73 London Road: located to the east of the site, there are currently no pedestrian facilities and it is considered that there would not be a strong desire line along London Road. However, the scheduled improvements to Junction 7 will include increased pedestrian and cyclist connectivity. Therefore, the Latton Priory site will coordinate its pedestrian and cyclist amenities to continue the proposed enhancements brought forward by the Junction 7 works.

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5.74 Fern Hill Lane: located towards the western end of Commonsode Road, has a footway along its eastern kerb line which terminates approximately 300 metres from the junction with Commonsode Road. It then narrows down to a single carriageway road towards the site boundary. There is opportunity to widen the road on its current southern extents to offer a more robust access way.

5.75 Riddings Lane: located towards the eastern end of the Commonsode Road, has footways along both sides of the kerb line until it passes the Latton Green School. It then has a footway along the eastern kerb line, which terminates approximately 300m from the site boundary. North of the access to Latton Green School, there is a combined off road cycle

/pedestrian footpath that cuts across to Commonsode Road.

5.76 Consultation with Essex County Council has confirmed that a vehicular access into Latton Priory from Riddings Lane is not desirable due to the very narrow carriageway width possible to install. Therefore, a comprehensive pedestrian and cyclist connection strip can be provided in isolation.

5.77 The routes described above could also deliver off street cycle routes. The following shared pedestrian/cycle footpaths will be considered:

5.78 Rye Hill Road: A shared pedestrian/cycle path of 2.5 - 3m on the eastern verge of Rye Hill Road, to connect with Paringdon Junior School and the existing pedestrian cycle link that runs north from the school, past the Staple Tye Shopping Centre on Southern Way, and up to the junction of Three Horseshoes Road and Third Avenue.

5.79 Fern Hill Road: A shared pedestrian/cycle path of 2.5 - 3m to connect with the pedestrian cycle link that runs north from Commonsode Road, just west of Copshall Close to the Staple Tye Shopping Centre on Southern Way.

5.80 Riddings Lane: Potential for a shared pedestrian/cycle path of 2.5 - 3m to connect with the pedestrian cycle link north of Latton Green School.

5.81 However, due to the low level of activity on Fern Hill Lane and Riddings Lane in their existing arrangement, cyclists could be allowed to share the road surface with other users.

Walking / Cycling Routes

5.82 The site will be able to assist in the delivery of a new „west-east? transport corridor. This has the potential to not only deliver a new strategic route for Harlow traffic but also provide a series of walking and cycling benefits. Latton Priory already benefits from a good walking and cycling network, although this would be improved by future development. To ensure that the development overcomes barriers to walking and cycling, it is important that the site delivers both on-site and off-site enhancements.

5.83 The masterplan will include a comprehensive network of walking and cycling routes through the site that will connect the housing blocks with the local facilities proposed within the development. The network should be inclusive to all potential users on site and cater for employment, retail, education and leisure based trips.

5.84 The on-site walking and cycling network should include strong links into the existing off-site networks such that walking and cycling is a viable alternative to the motorcar to access the off-site facilities.

5.85 The off-site network will include a high quality links into Harlow town centre, including the train station to improve integration and co-existence.

5.86 Together with the links identified above, it is vital to include strategic links into Harlow, together with the potential allocation that could provide employment opportunities. There will be a clear distinctive desire line between these and the site. As such a high quality route needs to be delivered to encourage the safe movement of both pedestrian and cyclists.

5.87 To the north of the site, a network of Public Rights of Way pass through a corridor of green open space linking through to the town centre. This PRoW network provides an attractive and alternative direct route to the town centre and also provides access to local facilities including shopping and education land uses. The site will provide links into the PRoW network.

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5.88 The off-site leisure networks will be improved to ensure the full integration of the potential development into the south Harlow hinterland.

Public Transport

5.89 In terms of public transport, the development is likely to be delivered in phases and will need to be reflected in the strategy for improvements to public transport routes. To ensure the long term viability of any improvements, the likely patronage levels also need to be considered.

5.90 A fast reliable public transport system is able to provide a viable alternative to the motorcar and a shift toward this mode of travel is essential for the development to be considered sustainable. To consider the potential routes, it is important to understand both the inbound and outbound trips that are likely across Harlow both at a local and strategic level.

5.91 To secure development and route viability, it is likely that initial development phases could be served by extending the existing bus routes. The existing routes 2 / 3 and 4 have been identified to serve the area north of the development, which can be extended and improved to serve the initial phases. It is envisaged that the existing routes would be extended to penetrate the site such that any future dwellings are a minimum of 400m of a bus stop.

5.92 On commencement of Phase Four and the link road between the phases is complete, it is considered that the development could support the provision of a new dedicated service. This new dedicated service will penetrate the site using identified roads that have been designed to cater for public transport vehicles.

5.93 Tellings Golden have been consulted on this strategy and have confirmed support for the proposals.

5.94 It is anticipated that the key destinations for this new route are likely to be Harlow town centre and the Harlow Town train station. Furthermore, the route through Harlow will be carefully selected to ensure that other key local services and amenities will be served to improve integration with Latton Priory.

5.95 A circulatory route that commences from the Harlow Town train station and serves both the town centre and Latton Priory has an anticipated 30 minute journey time. Taking into account stoppages and delay, it would be reasonable to assume that a public service vehicle could reasonably carry out this journey in one hour.

5.96 To maximise the attractiveness of public transport, it is important that the routes operate at high frequency times of peak demand. Therefore it is envisaged that during the morning and evening peak the routes will operate at a 20 minute frequency reducing to half hourly off peak and weekends. Any facilities that are to be provided, bus shelters etc., should be high quality and consideration should be given to the provision of Real Time Passenger Information.

5.97 It is acknowledged that the current network of public transport coverage within Harlow is hindered by highway capacity constraints. Priority should be incorporated into the local road network to improve public transport movement in and around Harlow.

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5.98 Together with road based public transport, the inadequate existing facilities at the existing rail stations are also identified and the accessibility could be potentially improved.

5.99 The robust and expansive range of possible offsite transport links offered at Latton Priory gives significant support to a possible north-south strategic transport corridor. We would support discussion to coordinate such an initiative.

North - South Public Transport Corridor

5.100 Within the Harlow Strategic Site Selection Report, the following opportunity is identified,

„In addition, analysis from Essex County Council has identified the potential for a sustainable transport corridor between the Gilston (Sites A and E) and Latton Priory (Site M) and a complementary east-west sustainable corridor also.?

5.101 Essex County Council make the following critical observation, that

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„Sustainable travel corridors are a key element of „garden settlement? approach. It is important to note that the north-south sustainable corridor would be contingent on a sufficient critical mass of development at M (Latton Priory) to deliver the necessary infrastructure including access to the M11 in addition to the corridor.?“

5.102 It is further recognised within this report that,

„Delivery of ~1,000 units has been assumed for this site in this report reflecting the landscape constraints encountered, but this lower level of growth may adversely affect the potential to establish a sustainable transport corridor linking to the Town Centre and sites to the north, and to limit impact on the local road network.?“

5.103 As part of this work, Highways England specifically refers to the potential of the Latton Priory site to improve links-to the town centre, rail station and employment sites and potentially to other development sites around the town.

5.104 We very much recognise the site’s potential to help deliver a north-south sustainable transport corridor and will work with the District and County Councils through the Development Forum process to help realise this proposal.

Ecology

5.105 The site was subject to an extended Phase 1 Habitat Survey by Southern Ecological Solutions (SES) in July 2013. A series of species surveys were undertaken in 2014 including invertebrates, reptiles, small mammals, wintering birds, breeding birds, badgers, bats, Great Crested Newts and a hedgerow survey. With regard to the principal species the conclusions are as follows:

- With regard to reptiles and common toads, appropriate mitigation will ensure the development is deliverable without adverse impacts
- With mitigation, the development could realistically be expected to result in a positive impact for invertebrates.
- With the planned retention of hedgerows and associated margins and enhancements to habitats, any residual impacts upon any population of small mammals are considered unlikely. Enhanced habitat will provide improved sheltering and foraging habitats.
- With reference to wintering birds, the majority of species are associated with broad- leaved woodland and hedgerows. These are Priority Habitats in the England Biodiversity Strategy and along with other Priority Habitats such as ponds, should be retained and enhanced. Those species associated with the open arable landscape, including populations of kestrel, skylark and yellowhammer of Local/District importance are unlikely to be retained following development. Mitigation measures will be implemented to account for this loss. There is potential to create new Priority Habitats in future development of the site such as flower-rich grassland and further ponds, which will enhance the site for birds and other wildlife.
- The clearing of any vegetation on site will be undertaken outside of the breeding season and the loss of arable farmland will be mitigated by implementing bird friendly farming practices. Mitigation could also include habitat enhancement offsite and support for agri- environment schemes. Hedgerows and small patches of woodland will be retained where possible.
- Whilst no badger setts were found present on site, there is evidence of badger activity. Consideration will be given to the timing and extent of any mitigation required. Prior to construction, a further badger survey should be undertaken to ensure that development at the site will not adversely impact upon the utilisation of the site by badgers.
- The bat survey undertaken concludes that although the proposed development will result in the loss of some habitats, the impact of this loss is likely to be small. There are sufficient opportunities within the scheme to provide compensation and enhancement following current best practice guidelines. It is concluded that the proposed development will be in accordance with relevant wildlife legislation and NPPF requirements.
- Although the proposed development will result in the loss of some terrestrial habitat in the vicinity of Great Crested Newts ponds, impacts are likely to be small and there are ample opportunities within the scheme to provide compensation and enhancement following current best practice guidelines. As such, the proposed development will be in accordance with relevant wildlife legislation and NPPF requirements.

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5.106 We note that Policy DM4 "Suitable Accessible Natural Green Space and Corridors" states that the Council will ensure the provision of Suitable Alternative Natural Green Space and Corridors (SANGSC) in relation to additional development. We also consider this policy under the relevant heading in Section 7 below.

5.107 The extent of the requirement to provide SANGSC and whether this will apply to the strategic development sites around Harlow, has yet to be determined. At this stage, and without prejudice to future representations on this issue, we note that the promoters of Latton Priory have control of extensive areas of open land that are not intended for development and which could provide SANGSC to mitigate the impact of the development itself and, possibly additional "strategic" SANG to meet the requirements of other development allocations.

5.108 This is a matter that we would like to consider jointly with the Council, possibly as part of the joint Developer Forum arrangements.

Green Infrastructure

5.109 We are proposing in the region of 150 acres of new accessible green space, incorporating an extension to the Southern Harlow green wedge, parks, allotments, sports facilities, play and recreational facilities. Much of this provision is identified within the attached Framework Masterplan.

5.110 The existing green open spaces around the Latton Priory site comprising woodland, hedgerows, green wedges and other planted elements, provides the basis for establishing the Green Infrastructure within the development. The Green Infrastructure will be a biologically diverse range of planted areas linking together across the site to provide wildlife corridors and will include extensive areas of multifunctional open space. This will include formal recreation such as playing pitches, grassland habitat, new tree planting, allotments and parks, which will be fully integrated and easily accessible by both existing and new residents.

5.111 There will be a wide range of new accessible areas of open space on the Latton Priory site including various communal areas. A new village green is proposed adjacent to the local centre and a number of small equipped play areas will be located throughout the layout to allow local children to easily access opportunities for recreation and play. Formal recreation is proposed within the centrally located green wedge. A detailed SuDS strategy is currently being developed, but principally, a number of attenuation areas are proposed along the northern and southern edges of the development. It is likely that swales running north south will allow for natural surface water drainage

Heritage

5.112 The site has been subject to a heritage desk based assessment and an archaeological geophysical survey. The desk-based assessment has established that the site has potential for Bronze Age remains and possibly Roman remains centred on the route of a Roman road that crosses north-south through the middle of the site. The geophysical survey recorded two possible Bronze Age ring ditches in the central eastern part of the site but failed to record any features that could be interpreted as a the Roman road. The remains recorded on site are considered to be of no more than local significance. The site is considered to have low potential for remains of all other archaeological periods.

5.113 There are two scheduled monuments located to the south of the proposed development area. These are Latton Priory (which also includes two listed buildings) and a moated site to the south of Dorrington Farm. Initial consultations have been undertaken with Historic England and Essex County Council regarding the potential effects on the setting of these designated assets. With suitable and appropriate design and landscaping response, the potential effects on their significance will be minimal.

Phasing and Delivery

5.114 The Latton Priory site is in single ownership, is viable and deliverable and there are no constraints to its early release for development.

5.115 The report by consultantsRedacted.... "Generating and Appraising Spatial Options for the Harlow Area" (January 2010) still provides useful analysis of the strategic development sites around Harlow. Table 11 of theRedacted.... Report indicates that land south of Harlow is capable of making the largest contribution in phase 1 of the plan period. This is explained in paragraph 5.1.27 which states: "primary considerations which informed the phasing schedule stem from the minimal relative degree of localised transport improvements required to accommodate these levels of development".

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5.116 This is confirmed by the assessment of the site's transport requirements carried out byRedacted.... (reported in detail above). This assessment identifies a range of robust highway improvements that will ensure Latton Priory can be delivered with a nil detriment to the existing network, and prior to the delivery of proposed Junction 7a, ensuring that the road network will still operate within acceptable limits.

5.117 This view is reinforced by the appraisal of the site contained within the 2016 version of the Strategic Land Availability Assessment, which assesses the site as being Available and developable. Its overall achievability is described as „marginal or unknown?”, though it is not clear why this comment has been made. The site is achievable and deliverable. The wealth of evidence which has been produced to support the promotion of the site over a number of years demonstrates that the site is eminently achievable.

5.118 We consider that the potential for early delivery of the site is recognised in the Housing Trajectory that forms Appendix 5 to the Draft Local Plan. This currently indicates a later start to the Latton Priory development (in 2019/20) to that of West Sumners (in 2018/19) but we consider the timescale for West Sumners to be wholly unrealistic as it would require completion of the Local Plan process, preparation of an application, submission, consideration, approval and site preparations all in a little over 2 years.

5.119 On the basis of the above analysis, Latton Priory can be brought forward earlier than the other proposed Harlow strategic allocations, as anticipated by theRedacted.... report, to make a contribution to the District's five year land supply.

The Needs of Travellers

5.120 Policy SP3 C refers to the requirement for the provision of land for Gypsies and Travellers. The provision for 0.5 hectares (up to 5 pitches) for travellers has been set out within the policy for each of the strategic allocations. We have a number of concerns about this requirement.

5.121 First, a sequential approach to site identification for travellers is defined in paragraph 3.57 of the Plan and again within Policy SP2, but the two approaches are not consistent.

5.122 Second, it is not evident that the Council have adhered to the sequential approach as they propose to meet their entire remaining Gypsy and Traveller provision in the strategic allocations, whereas the sequential approach requires that other options have been fully explored and exhausted prior to this form of provision. The sequential approach as defined in paragraph 3.57 of the Plan refers to the provision of pitches at the strategic allocations only “where sufficient provision cannot be found from the above sources”

5.123 Third, it is clear that Policy SP 3 sets out a precise requirement for pitches at each strategic allocation that will in total exceed the District's overall requirement. This suggests that the sequential approach is the opposite of that defined by the Plan and seeks to accommodate more than the total requirement at the strategic sites and not meet this need by any other means.

5.124 We call for some at least some flexibility in the application of a requirement at the strategic allocations. In the light of the sequential approach, this requirement should not be prescriptive and the wording of the policy should make clear that it will only be triggered if provision from the other sources proves insufficient to meet the identified needs.

5.125 Further, we would suggest that the provision of pitches at strategic allocations be subject to masterplanning and design considerations within the scope of the process defined by sub paragraph E of Policy SP3.

6. STRATEGIC POLICY SP 4 TO SP 6

Policy SP 4 Place Shaping

6.1 We support the objectives of this policy and most of its requirements. However, we consider that there should be separate place shaping requirements for strategic and smaller sites.

6.2 It will not be possible for all smaller sites and allocations to meet the criteria set out. For example, the strategic allocations should lend themselves to providing a mix of land uses, but the smaller residential sites allocated in Chapter 5 may not be able to meet these criteria. For example, a small residential development site is unlikely to

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provide, "a robust range of employment opportunities with a variety of jobs within easy commuting distance of jobs". It will be for the Council to ensure that their site selection enables the residential developments to achieve this.

6.3 We would suggest that place shaping principles be devised, discussed and agreed with developers, specifically for the strategic sites, through the developer forum and masterplanning processes. Some of these principles could then form part of individual strategic allocation policies.

6.4 We think it would be helpful to devise place shaping principles and requirements specifically for the strategic sites around Harlow.

Policy SP 5 Green Belt and District Open Land

6.5 Over 92% of Epping Forest is designated as Green Belt, and it has been a long held view of the Council that a review of the Green Belt boundary would be necessary in order to accommodate long term development needs.

6.6 We support the Council's policies and proposals with regard to the Green Belt and, in particular, the alterations to the Green Belt boundary to allow the allocation of strategic sites around Harlow.

6.7 As stated in paragraph 3.88 of the Plan, the NPPF requires that exceptional circumstances are demonstrated to justify any alteration to the Green Belt boundary. It is important to recognise that the exceptional circumstances are most clearly evident and compelling where the level of need for development is acute.

6.8 We consider that the extent of unmet housing needs in Epping Forest and the overall need for growth and regeneration at Harlow, constitute the exceptional circumstances that justify Green Belt alteration. The needs of Harlow are clearly set out in paragraph 3.90 of the Plan and we think it would be helpful to define these needs as exceptional circumstances.

6.9 At this point in plan preparation, the Council has yet to identify revised Green Belt boundaries for the proposed strategic allocations. We would suggest that there be a stage 3 Green Belt assessment specifically for the strategic allocations to define appropriate boundaries, including areas that will be redefined as "District Open Land" with the same level of protection as Green Belt.

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6.10 We would suggest that the question of Green Belt boundaries for the strategic allocations be considered in the context of the proposed developer forum. We have landscape and other technical studies that can assist in the boundary definition at Latton Priory through this process.

Policy SP 6 The Natural Environment, Landscape Character and Green Infrastructure

6.11 We very much support the objectives of this policy. Our proposals for Latton Priory have sought to make a major contribution to the comprehensive network of green corridors and places that the Policy refers to.

6.12 We particularly support sub paragraphs D and E of the Policy including the expectation that all development proposals contribute towards the delivery of new green infrastructure which develops and enhances a network of multi-functional green and blue assets. Extensive areas of land are to be set aside at Latton Priory for this purpose.

6.13 As stated in Section 5 above, we are proposing in the region of 150 acres of new accessible green space, incorporating an extension to the Southern Harlow green wedge, parks, allotments, sports facilities, play and recreational facilities. Much of this provision is identified within the attached Framework Masterplan.

7. OTHER POLICIES OF THE PLAN

Policy H1 Housing Mix and Accommodation Types

7.1 We generally support the principles of this policy and the fact that it provides important criteria to guide the consideration of such matters in development proposals, rather than prescriptive or inflexible specific requirements.

Policy H2 Affordable Housing

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7.2 We generally support the Plan's approach to the provision of affordable housing. We note that the current requirement that 40% of homes be affordable, on sites of 11 or more homes, exceeds the level of need and would welcome further discussions on the derivation of this target and its application to the strategic sites in particular.

7.3 However, our aim is to make a policy compliant provision of affordable homes at Latton Priory and to work with the Council to ensure delivery. We welcome the Council's approach to viability considerations within the Policy.

Policy E1 Employment Sites

7.4 As stated in Section 5 above, we would like to see Policy E1 (alongside Policies SP2 and SP3), give greater recognition and priority to the provision of new accessible and highly marketable employment land as part of the strategic allocations around Harlow, particularly at locations with the best access to the motorway network.

7.5 At paragraph 4.41, the draft Local Plan states,

"Given the limited supply of readily available employment sites within current policy constraints, there is potential to consider a programme of renewal for some sites, in particular those where Epping Forest District Council has some ownership, such as at Oakwood Hill. This will help to make the most of existing land alongside the consideration of new allocations." (Boyer emphasis)

7.6 At paragraph 4.4.2, the Plan states:

"Based on the evidence, therefore, the Councils' approach is to protect and enhance existing employment sites (including through intensification), together with the allocation of new sites where appropriate. Such an approach would provide for the employment development needed to support sustainable long-term economic growth within the District and the wider area whilst limiting the extent of land that will need to be released from the Green Belt."

7.7 The reference within the text to current policy constraints does not link with the approach taken elsewhere in the plan in terms of Green Belt release and the particular policy constraints which can be overcome.

7.8 It should be noted that the 2010 Employment Land Review identifies few opportunities for employment within the District, if a "policy-on" approach is taken to the assessment of land. It refers to the requirement for a future Green Belt review for strategic employment sites. It is stressed throughout that the Green Belt poses a constraint to employment expansion or the development of strategic employment sites without review.

7.9 Paragraph 4.55 of the Employment Land Review notes that

"However, it should be noted that both local authorities are constrained by Green Belt policies, this will mean that in practical and policy terms it will be challenging to find new land on this scale for employment use. There will be a need to review Green Belt designations to assess whether there are opportunities to allocate sufficient employment land to meet these needs."

7.10 A Green Belt assessment has been undertaken but this has been driven primarily by the need to identify strategic housing sites. That assessment also provides opportunities to provide strategic employment land at the most accessible and marketable locations within the District.

7.11 Collectively, Policies SP2, SP3 and E1 need to set out clear requirements for the required quantity of employment land, spatial priorities for its location and specific allocations at strategic sites. We understand the Council is aware of the need to develop the policies of the Plan to achieve this and this is certainly a priority before publication of the Regulation 19 version of the Plan. This is important in order to meet the requirement of NPPG paragraph 10 which states:

"Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the „what, where, when and how? questions)"

Policy DM 4 Suitable Accessible Natural Green Space and Corridors

7.12 We support the aims of the policy and have referred to how its objectives could be addressed in the context of Latton Priory in section 5 of this representation.

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7.13 We have researched this issue and would welcome further discussions with the Council specifically on the need for and potential of SANG provision at Latton Priory.

Policy DM 5 Green Infrastructure

7.14 We support the aims of this policy. In particular, we recognise and endorse the requirement for strategic allocations to provide a full concept plan of proposed green infrastructure that incorporates existing features on the site and its links to the wider landscape and townscape. This is a matter that we consider should be addressed through the proposed developer forum process.

Policy DM 7 Heritage Assets

7.15 We support the aims of this policy. Whilst it is reasonable to seek enhancement to heritage assets and their settings we do not think it is appropriate for the policy to require development proposals to "demonstrate how the asset will be enhanced"

7.16 In the context of strategic sites, it will be necessary to consider the requirement to protect heritage assets as part of the planning balance in relation to the overall merits of and need of the development.

Policy DM 20 Low Carbon and Renewable Energy

7.17 We support the aims of this Policy but would want to ensure sufficient flexibility in requirements and solutions to achieve them, in the light of continuing changes in low carbon and renewable energy technology. On this point, we are concerned that the requirement in sub paragraph D that all major development will be required to incorporate infrastructure for District heating, is too prescriptive and inflexible.

8. SUMMARY AND CONCLUSIONS

8.1 These representations have been prepared byRedacted.... on behalf ofRedacted....in response to the Epping Forest Local Plan.

8.2 We are pleased to have the opportunity on behalf of our clients to contribute towards the preparation of the Local Plan. Our clients are broadly supportive of the Local Plan and its spatial strategy.

8.3 In summary, the submissions are:

- We support the vision and objectives of the Plan.
- The strategy to locate major development adjoining the Harlow urban area is supported.
- We suggest that the proposed capacity limit of 16,100 dwellings at Harlow, based on transport infrastructure requirements, be reviewed to ensure that the growth and regeneration objectives for Harlow are not limited and other settlements in the Plan area are protected.
- We support the proposed strategic allocations at Harlow and in particular the allocation of Latton Priory. There is potential to increase the land area for development at this location.
- The potential to provide strategic employment land at the Harlow allocations and at Latton Priory in particular, warrants further examination to maximise the sustainability benefits of the development and make a major contribution to the delivery of new jobs in the most accessible and marketable employment location in the District.
- The opportunity to create a north/south sustainable transport corridor through Harlow is supported subject to further assessment and, if found sound, should carry a specific policy commitment.
- Our Clients support the ongoing commitment to working across boundaries in the HMA.

8.4 Our Client's site can provide the following benefits:

- Land at Latton Priory can deliver early in the plan period
- The site is within single ownership
- Its development will provide benefits to both Epping Forest and Harlow
- The topography of this area defines an area that is highly contained in landscape terms

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- Makes a limited contribution to the Green Belt

- Provides the opportunity for regeneration

- Can provide an early phase of development in a location with the least demands upon major infrastructure

8.5 Latton Priory has been promoted for a number of years through the Development Plan process, during which time a thorough and robust evidence base has been drawn up in support of the development of the site. The technical work undertaken demonstrates that the site is available for early delivery in the plan period to make a valuable contribution towards meeting housing needs.

8.6 The site is at the lowest risk of flooding and there are no insurmountable barriers to infrastructures, service or technical constraints.

8.7 There is both an opportunity to create a logical and defensible Green Belt boundary and to extend Harlow's green wedge.

8.8 Development of the site will be capable of providing a viable package of highways mitigation but it will also be able to deliver highways improvements to provide greater capacity to the transport network.

8.9 The proposed employment area, together with local services and amenities within the site will help reduce the need to travel outside the local area.

8.10 Market demand advice and economic reports lend weight to the viability of the site and its early release for development. Latton Priory is well positioned to deliver an integrated extension to Harlow and there are no overriding constraints to its development.

8.11 These representations are submitted for consideration in the preparation of Epping Forest District Council's Local Plan.

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