

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

Stakeholder ID	3955	Name	Hannah Bevins
			Amec Foster Wheeler

Method	Letter
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Letter or Email Response:

Amec Foster Wheeler is pleased to have the opportunity to respond to the Local Plan consultation. Overall we feel there is a significant risk of the Plan being found unsound because it will not meet the Council's significant development needs over the Plan Period. The Council is currently planning for a shortfall against its Objectively Assessed Need (OAN). Accordingly, in order to ensure the Plan's soundness and to better reflect the guidance in NPPF, particularly the need to significantly boost housing supply, the Council will need to increase the housing target in the Plan and make further allocations in addition to making additional amendments to the Green Belt boundary. This response proposes an alternative site allocation in south west Lower Sheering for development; the site is located adjacent to the River Stort and is currently open land adjacent to a mooring site. The land submitted is entirely flood zone 1 (lowest probability of flooding).

1. Draft Policy SP2: Spatial Development Strategy It is considered that Policy SP2 is unsound as the level of growth set out in the policy to 2033 will fail to meet the OAN for market and affordable housing. Policy SP2 plans for the delivery of 11,400 homes in the period 2011 to 2033 which is significantly short of the level of growth identified as being the OAN (13,278). We are concerned that the level of growth currently set out in Policy SP2 does not provide a sound basis to meet housing needs in the District over the plan period. Paragraph 47 of NPPF states that to significantly boost supply, local planning authorities should "use their evidence base to ensure that their Local Plan meet the full objectively assessed needs for market and affordable housing". The basis of the Council's chosen housing target is set out in the Housing Background Paper which outlines that the 2015 SHMA identifies an objectively assessed housing need of 46,100 across the HMA. However the most recent evidence in the SHMA Update (September 2016) states that the OAN is much higher (54,000) than previously calculated (46,100). To provide a more positive strategy which significantly boosts housing supply, the Council will need to give consideration to a higher rate of growth and allocate additional sites accordingly. Increasing the number of allocations would be consistent with the call to significantly boost housing delivery as required by paragraph 47 of NPPF. This should include additional land at Lower Sheering to assist in meeting rural needs. Policy SP2 identifies that the main bulk of growth will be delivered through significant urban extensions at Harlow (16,100 dwellings within the HMA, 3,900 of which will be within Epping Forest District). There are significant concerns about the deliverability of sites in Harlow and whether the local market will be able to sustain this level of growth over the full Plan Period. We do not consider that the Spatial Strategy outlined in Policy P2 with a weighting towards Harlow will adequately address housing need in other parts of the District. NPPF and the Planning Practice Guidance state the importance of addressing issues facing rural areas in terms of housing supply and affordability, and recognise the role that housing can play in supporting the sustainability of smaller settlements. The Plan should therefore provide an alternative distribution of housing which more effectively

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addresses housing needs elsewhere. Further development at Lower Sheering can assist in meeting development needs for the location as well as its rural hinterland. In summary, in order to be found sound, the Plan should increase the rate of housing growth from 11,400 (518 dpa) to at least 13,278 (604 dpa) and allocate more sites at sustainable locations such as Lower Sheering to assist in meeting rural housing needs. 2. Draft Policy P12 Policy P12 notes that eight additional settlements (including Lower Sheering) are suitable for alternative site allocations, with Lower Sheering being able to accommodate approximately 30 dwellings. As noted above, the Draft Local Plan currently shows an over reliance on Harlow to deliver 3,900 homes which will not meet needs elsewhere. The Council will need to identify additional sites in order to assist in delivering a sound Plan, including at sustainable settlements such as Lower Sheering. Our client's site at Lower Sheering can play a role in meeting future development needs in a sustainable way. The site could accommodate around five dwellings. The site provides a deliverable and developable site in line with guidance in the NPPF. In particular, the site is available now, it offers a suitable location for development and is achievable with a realistic prospect that housing could be delivered within five years. The site is deliverable because: It presents a logical and sustainable location for new housing provision. The site can deliver a high quality development to assist in meeting the significant development needs in the District. Although located within the Green Belt, the site makes a limited contribution to the openness of the Green Belt and should be considered for release. Areas suggested for development represent a natural rounding off of the existing settlement edge utilising the established landscape framework. The land adjacent to the River Stort is sandwiched between Lower Sheering and Sawbridgeworth and serves no strategic function to Green Belt purposes. Rounding the settlement off in line with the current southern settlement boundary would seem entirely sensible and pragmatic. It is not covered by any strategic constraints which would prevent development. Whilst land to the west is shown within Flood Zone 2 (according to the EA flood maps) the submitted site is entirely Flood Zone 1 which would be suitable for development and relates well to the existing built environment. Our client is willing to bring the site forward. The site is currently in use as open land and can deliver a high quality development to assist in meeting the Local Plan requirement, including a mix of dwellings. It relates well to existing development off Luxford Place, where an access can be provided and the site would form a natural extension to the existing settlement. Summary In summary, it is considered that this site provides an additional opportunity to deliver sustainable development in the settlement. It would utilise land of low landscape value and low value to the strategic purposes of the Green Belt. The site can make a contribution to increasing the supply housing to assist the Council in meeting its objectively assessed needs and should be allocated.

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