

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

Stakeholder ID	4621	Name	Nicola	Blanks	Bidwells on behalf of Barratt Eastern Counties
Method	Letter				
Date	2/2/2017				

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Letter or Email Response:

Representations by Bidwells on behalf of Barratt Eastern Counties in respect of land west of the Pinnacles, Harlow 1.0 Objection is raised on behalf of Barratt Homes Eastern Counties Limited in respect of the retention of Green Belt status of land west of the Pinnacles Industrial estate, Harlow through failure by the draft Local Plan to include that land as part of a western expansion of Harlow. These representations argue the land is well suited to accommodate new homes and supporting infrastructure as part of a comprehensive approach to the southern and western expansion of the town and without risk to settlement coalescence. The representation site is identified in Appendix 1 and similarly in the figure 3.7 to the draft Local Plan as parcels S and P (see Appendix 3 for local plan extracts). 2.0 It is noted how the proposed edge of Harlow allocations, identified in figure 3.7 to the draft plan, form a ring of fresh development west and south west of Harlow and physically adjoin the representation site. It is known promotional evidence for these allocations volunteer a buffer of green infrastructure to exclude any future connectivity to the representation site. That permanently denies scope for a future integrated planning approach for the western and southern edges to Harlow and their connectivity north and north west. 3.0 The land, the subject of these representations, was first promoted in 2011 with the document A Vision for West (LDA January 2011) and prepared for Barratt in response to the Scott Wilson overview of potential strategic growth options. That overview had been commissioned by affected local planning authorities to guide the future potential expansion of Harlow and where a western expansion of Harlow did feature as an option with advantages in respect of sustainable movement. 4.0 The * report was adapted in December 2011 for a series presentations hosted by both Harlow and Epping Councils (see Appendix 1). As part of these presentations, a technical submission was provided in respect of infrastructure (transport and drainage) which pointed to the sustainable advantages of the site. Added value of this site was demonstrated in the way it facilitated comprehensive infrastructure planning for proposed development areas to the west and south of Harlow. Improved utility and road access to the north and north west of the town would be created. Some aspects of this are illustrated in Appendix 2 to this submission. 5.0 Following these 2011 submissions there remained concerns from Harlow and Epping Councils for coalescence with Roydon to the west. However, the promotion evidence, and illustrated by the Vision masterplan demonstrated how a new Green Belt boundary could frame any new built form. Hence the remainder of the masterplan land would be left as Green Belt. It is noted how the juxtaposition of the proposed West Katherines and West Sumners urban extensions are close to adjoining settlements but this has not prevented their more favoured consideration in the draft Local Plan. 6.0 The draft local plan acknowledges in para 3.49 that "Harlow represents the most sustainable location within the HMA..." Draft Policy SP2 confirms that the allocated sites on the edge of Harlow,

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but within Epping Forest District, account for 3,900 homes. 7.0 Draft policy SP3 sets out the locations of those Harlow sites i.e. SP3.1,3.2,3.3 and 3.4 (see Appendix 3). That policy offers further guidance in its constituent explanatory paragraphs A, B, C, D, E and F where it is clear these allocations are required to fund significant off-site infrastructure. 8.0 Given the significant likely cost of infrastructure burden expected from these sites, it would be expected that there needs to be reasonable certainty for their viability. However, there is no viability assessment evident to offer comfort for their viable delivery. The absence of the representation site from the SP3 sites identified in figure 3.7 denies a future pattern of further development completion It is submitted that this should be considered before the draft local plan advances to a later stage. 9.0 These representations therefore submit that it is short sighted to foreclose the potential for a further 1100 homes on land west of the Pinnacles. With its proposed allied strategic green infrastructure (see Appendix 1) there is sufficient land to retain key areas for Green Belt to ensure no risk of coalescence. It will complete a comprehensive and sustainable masterplan approach and assist viability for the wider future growth strategy of Harlow. Objection is therefore raised to the following policies: a. Policy SP2 as it need to increase new homes around Harlow beyond 3900 b. Policy SP3 Strategic Allocations around Harlow because of the absence of land identified west of Pinnacles for housing c. Fig 3.7 because of the absence of allocation of land west of Pinnacles Suggested modifications are therefore as follows: 1.1 Policy SP2 Site around Harlow to be 5000 new homes. 1.2 Policy SP3 to include a further allocation site reference SP 3.5 for land west of Pinnacles and to deliver a further 1100 homes. 1.3 Figure 3.7 to be amended to include site S as identified in Figure 3.7 for residential development *Appendix 1 VISION DOC PROVIDED IN EARLIER REPRESENTATIONS Appendix 2 INFRASTRUCTURE EVIDENCE PROVIDED WITH EARLIER REPRESENTATION Appendix 3 RELEVANT POLICY EXTRACTS REGARDING HARLOW*