

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

Stakeholder ID	4614	Name	Trevor	Dodkins on behalf of Bloor Homes Eastern	Phase 2 on Behalf of Bloor Homes Eastern
Method	Letter				
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### Letter or Email Response:

Introduction These representations to the Draft Regulation 18 Local Plan are submitted on behalf of our clients, **Redacted....**, which has interests land identified as site reference **Redacted....**. Although the site has been considered as part of the Local Plan process via the Arup Site Assessment report, with the latter indicating that feedback has been received, the site has not been promoted in the past. The site is shown on the location plan attached with this response with the site edged in red. Our clients have interests in land to the north of the **Redacted....**, but this has been excluded on the basis that the **Redacted....**. The land edged in red equates to an area of 12.54ha as noted within the Arup report, and although they indicate that this could accommodate 375 dwellings at a density of 30dph, we consider that the capacity will be somewhat less than this, possibly around 250 dwellings, in order to allow for landscaping and open space to facilitate a softer urban edge in this part of **Redacted....**, compared to the rather harsh boundary that exists at present. The following sections will in addition to outlining our proposal for the residential allocation of **Redacted....**, also respond to matters raised both within the Draft Local Plan itself, and in particular to the evidence base. Our main response will be to Chapter 5 in relation in providing more background to the site, and in response to the Arup site assessment in order to demonstrate that the site does not have any insuperable constraints and is deliverable within a quick timescale, ensuring the District's housing needs are met without delay. The Council has set 9 questions as part of this consultation, which we respond to in this report under the following Chapter headings. Chapter 3 Section 2 - Q1. Do you agree with the overall vision that the Draft Local Plan sets out for Epping Forest District? (See paragraph 3.26, Chapter 3). Section 3 - Q2. Do you agree with our approach to the distribution of new housing across Epping Forest District? (See Draft Policy SP 2, Chapter 3). Section 4 - Q3. Do you agree with the proposals for development around Harlow? (See Draft Policy SP 3, Chapter 3). The draft Local Plan identifies the Housing Market Area for Epping Forest District Council (EFDC) to include the four local authority areas of East Hertfordshire District Council (EHDC), EFDC, Harlow District Council (Harlow) and Uttlesford District Council (UDC). The 2015 SHMA prepared by Opinion Research Services (ORS) indicated an OAN of 46,100 new dwellings of which 11,300 (24.51%) were attributed to EFDC for the period 2011 to 2033 (514 per annum). However, based on an updated OAN, provided by ORS to take account of DCLG 2014 household projections, the OAN for the HMA is considered to be 54,608, of which ORS assigned 13,278 to EFDC (604 per annum). In setting the EFDC housing requirement, paragraph 3.45 of the draft Local Plan explains that various options for housing delivery and distribution were considered by the Co-op Member Board in a range from 48,300 to 57,400 new dwellings (the latter we

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presume to be the 2016 SHMA OAN of 54,608 plus 5% buffer as required by paragraph 47 of NPPF) as set out in the Strategic OAHN Spatial Options Study for the West Essex and East Herts authorities (AECOM, August 2016). Under the higher range of dwellings tested AECOM attributed 14,152 new dwellings to EFDC for the plan period (643 per annum). From the information contained in the draft Local Plan it is difficult to identify what the Council believes to be its Objectively Assessed Housing Need (OAN), and we have concerns that the adoption of a Housing Target at 51,100 is not justified - although the explanation at paragraph 3.35 of the draft Local Plan gives blanket reasons of infrastructure, environment and policy considerations for not meeting the full HMA OAN but this is not explained in detail. In the absence of adequate explanation it would be difficult for an Inspector to assess soundness where the Council is not being proactive and planning to boost significantly the supply of new homes. In order for the Plan to be robust and defensible at the Examination, this needs more specific justification. Spatial Strategy Epping Forest District Council has acknowledged that "exceptional circumstances" do exist to justify the release of land from the Green Belt in order to meet its OAN (paragraph 3.87 of the draft Local Plan). The next step is to select the most sustainable sites in the most suitable locations. We support the identification of Redacted.... as a "Town" within the settlement hierarchy set out in Figure 5.1. However, we are concerned that Draft Policy SP2 proposes allocations for up to 230 dwellings in "small villages" which are locations that conflict with the "Core Principles" of the NPPF. These villages include: Coopersale (50), Fyfield (90), High Ongar (10), Lower Sheering (30), Roydon (40) and Stapleford Abbots (10). These locations are not sustainable locations for development of this scale and their identification is inconsistent with the Sustainability Appraisal. It is our submission that these 230 dwellings should be redistributed to the towns and larger villages in accordance with the hierarchy set out in Figure 5.1 and in particular Redacted.... as a main town, reflecting the settlement's high level of sustainability. The Spatial Strategy is also absent of any flexibility and contingency to address non-delivery or delay of larger allocations within the Local Plan. For example the Local Plan is centred around delivering 3,900 dwellings on the edge of Harlow under the duty to co-operate. However, the implications of Harlow's recent decision at its Special Council Meeting on the 31st August 2016 to reject sites to the south and west of the town at Latton Priory, West Sumners, and West Katherines puts at risk the supply of 3,100 dwellings. Again, this needs specific justification for the Plan to be robust, and indeed leads to a view that insufficient allocations have been made in higher order settlements such as Redacted.... Chapter 5 Section 7 - Q6. Do you agree with the proposed sites in your area? (See Chapter 5) The draft Local Plan makes clear that the ARUP Site Selection Report 2016 has informed key decisions in respect of site allocations. We have reviewed the criteria, scores and qualitative assessment within the Arup report, and in particular in relation to the proposed allocation sites within Chipping Ongar, together with the Stage 2 assessment of our client's land (Site Reference SR-0051) at London Road. These scores are shown on a comparative assessment attached as Appendix 1, recorded as scored by Arups, but corrected in the final row by Phase 2 for the reasons set out below. Our response can be set out as follows under the following headings, with reference to the criteria set out in the Arup Assessment relating to each site. However, at this stage we note from an Arup presentation in the summer that the scores and qualitative assessments are based largely on GIS data "and professional judgement", and this will form the basis of the following. Criteria: 1.1 Impact on Internationally Protected Sites 1.2 Impact on Nationally Protected sites 1.3a Impact on Ancient Woodland 1.3b Impact on Ancient/Veteran Trees outside of Ancient Woodland 1.4 Impact on Epping Forest Buffer Land 1.5 Impact on BAP Priority Species or Habitats 1.6 Impact on Local Wildlife Sites No unexpected impacts identified, and no comments in response. 1.7 Flood risk Most sites including land at the Redacted.... site located within Zone 1. 1.8 a Impact on heritage assets 1.8b Impact on archaeology The scores for all sites are expected given that archaeology is unknown, with the exception of site SR-0186, which identifies the possibility of archaeology being found, but considers this possibility to be low without any additional justification. We have therefore corrected this in the final row within appendix 1 to be the same for all sites. 1.9 Impact of air quality No impact identified, and no comments in response, although we would query why site SR-184 scores as neutral compared to sites SR185 and 0186. 2.1 Level of harm to Green Belt It is interesting to note that the scores on impact to the Green Belt are identical, possibly reflecting the fact that the Green Belt Assessment August 2016 notes that all GB land on the edge of Redacted.... performs at least one Green Belt purpose, leading to the conclusion within that study that the summary of harm to GB purposes by new development on each of the areas studied around Redacted.... is either 'high' or 'very high'. This is partly due to landscape and topographical factors which will be addressed below. 3.1 Distance to the nearest rail/tube station 3.2 Distance to nearest bus stop 3.3 Distance to employment locations 3.4 Distance to local amenities 3.5 Distance to nearest infant/primary school 3.4 Distance to local amenities 3.7 Distance to nearest GP surgery These appear to be

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an accurate assessment, and no comments are made. 3.8 Access to Strategic Road Network No impact identified, and no comments in response. 4.1 Brownfield and Greenfield Land This assessment scores as minus 1 where greenfield land is involved which relates to all sites, but with an additional deduction where the site is distant from the settlement boundary. No comments are made in response to this. 4.2 Impact on agricultural land 4.3 Capacity to improve access to open space No harmful impact identified, and no comments in response. 5.1 Landscape sensitivity 5.2 Settlement character sensitivity 6.1 Topography constraints It is noted that a number of the sites would have an impact of the character of the settlement unlike the land at London Road which has a neutral score. However 2 sites are claimed not to have a topographical impact which we would query, as it is clear that **Redacted....** is located between two areas of high land at the north and south linked by a ridge of high land running along the High Street and beyond. As such the settlement is characterised by having land that slopes down away from all settlement boundaries which raises issues of visibility and the ability to contain the impact of development which affects all sites. As such we have corrected the assessment to apply a negative figure to all sites. 6.2a Distance to gas and oil pipelines 6.2 b Distance to power lines 6.3 Impact on Tree Preservation Order (TPO) 6.4 Access to site 6.5 Contamination constraints No impact identified, and no comments in response. 6.6 Traffic impact There appears to be inconsistencies in the scores between the sites on this issue. Clearly any development will have some traffic impact, and the scores have been corrected to be consistent. We attach our comparative assessment of the 2 sites within Appendix 1 of this response. This shows that there is not a great deal of difference between many of the sites, although site SR-0067i scores relatively poorly as it does include land that is not proposed to be allocated. As such, there does not appear to be any overriding environmental or sustainability reason why the land at **Redacted....** should not be allocated for housing, either instead of or in addition to allocations already proposed given the issues of overall strategy for the delivery of housing identified earlier. Summary and Conclusions We therefore object to the non-inclusion of site SR-0152 Land at London Road as a housing allocation, on the basis that:

- **Redacted....** is correctly identified as a town with a good range of services;
- We have no confidence in the thoroughness and therefore credibility of the Site Deliverability Assessment prepared by Arup, and the qualitative assessment conclusions, which have been challenged as above;
- There are no constraints to development at **Redacted....** that cannot be overcome by appropriate mitigation if required at planning application stage;
- The site can deliver housing within a short period of time, as well as contribute positively to the Council's community needs. The site is eminently suitable, available and achievable for development given the Arup scores as identified above, and although we accept that site has not been promoted in the past, there is no indicated rationale within the consultation document for non-inclusion. The site would enable the existing harsh urban edge at this important entry into the town to be softened and integrated into the countryside leading to an improvement in the character of the edge of the town; creating a new and defensible green belt boundary; and also allowing the existing **Redacted....** to be integrated within the town rather than anomalously being left as green belt which is discordant with its more recent use for residential purposes. In addition as set out above and we note endorsed by the HBF submission, the consultation document is flawed in terms of housing numbers and the evidence base that justifies these, and the emerging Plan as a consequence is out of step with the clear advice of the NPPF in relation to significantly boosting the delivery of housing and taking a pro-active approach to achieve this (para 47). The clear opportunity exists therefore to allocate the land identified on the attached location plan. We trust the above comments will be taken in to account as the draft Local Plan is progressed. \*Appendix Attached to letter\*

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