

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

Stakeholder ID	4618	Name	Sam Hollingworth on behalf of Mr Davies
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Letter or Email Response:

Introduction and background 1. These representations on the Epping Forest District Draft Local Plan 2016 (DLP) are submitted by [Redacted....], and in respect of site reference SR-0154 as part of Epping Forest District Council's plan-making process, in [Redacted....], Ongar. 2. A plan showing the site is provided as Appendix 1 to this representation. 3. It is proposed that part of this site be utilise for residential development to help meet the District's housing need. 4. The site is located in the heart of the [Redacted....], a village located 2.3 miles to the south-west of Chipping Ongar; and 3.5 miles east of Epping. It is an established rural community, with some existing facilities and services. The village has a clear identity of its own, and the annual [Redacted....] village show takes place each August. 5. The site is located on the curve of Epping Road. Residential development is located on adjacent land to the west and north of the site, fronting Epping Road. Development of land fronting site SR-0154 would form an arc of housing along Epping Road, continuing the existing pattern of built form. It may be more appropriate to rename this site "Land fronting Epping Road/ School Road" as part of the plan-making process, to make clear that the element fronting the road is that which is proposed for development. It is proposed that the land to the rear of this proposed arc of development would remain as green space, reflecting the existing character of the village. An indicative plan illustrating how the site could be developed is provided as Appendix 2 to this representation. 6. The site is not subject to any physical constraints that would restrict its potential development for housing. It is located within Flood Zone 1 - land least at risk of tidal or fluvial flooding, and suitable for any type of development from a flood-risk perspective. It is not within or near any areas subject to any environmental or ecological designations that would be restrict its deliverability. 7. The topography of the site is such that development within the north-western area would be challenging. However, as noted above - and as illustrated in Appendix 2 - this area of the site is, in any case, proposed to be retained as green space in order to reflect the existing pattern of development. Approach to identifying and meeting housing need 8. The new Local Plan is required to allocate additional land for housing, and to deliver a significant uplift in current housing delivery rates in the District. 9. The National Planning Policy Framework (NPPF) is clear on the importance of housing delivery, and on the need for planning to deliver objectively assessed housing needs. The core planning principles set out in the NPPF include the following: "Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of

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the residential and business communities" (NPPF paragraph 17). 10. In addition, the NPPF contains an express requirement (paragraph 182) for Local Plans to be 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 – a Local Plan cannot be found sound and adopted if it fails this requirement. 11. Given that it is critical for the Local Plan to seek to meet objectively assessed housing needs in full, we have concerns regarding the approach advocated by the DLP: the DLP suggests the objectively assessed need was identified as 46,100 for 2011 to 2033 for the housing market area of East Herts, Epping Forest, Harlow and Uttlesford through a Strategic Housing Market Assessment published in 2015. Of this figure of 46,100, a need of 11,300 was identified for Epping Forest District. However, in 2016, the Government released revised population and household projections. In August 2016 Opinion Research Services (ORS) updated the overall housing need to take into account more recent information, including the more up-to-date 2014-based household projections, and identified a revised objectively assessed housing need for the housing market area of 54,608 between 2011 and 2033. The update goes on to state that the objectively assessed housing need for Epping Forest District is 13,278 dwellings. As such, it is clear that if the EFDC Local Plan is to be found sound, additional sites to those proposed in the DLP will have to be allocated for housing. Consideration of site reference SR-0154 through the Local Plan process 12. Site SR-0154 at **Redacted....**, Ongar is not proposed to be allocated for residential development through the DLP. 13. Decisions in respect of which sites are proposed for allocation, and which have been rejected, have been strongly influenced by EFDC's site assessment process, details of which have been published alongside the DLP. 14. Site SR-0154 was rejected at stage 1 of the site assessment process. The reason for its rejection is that it is deemed to be a site "subject to major policy constraint". On examination, the major policy constraint in question is that the site is located outside of the Settlement Buffer Zone which has been established by EFDC. The site assessment methodology explains that as part of the Green Belt Review Stage 1 (2015) the Council identified buffers for towns, large villages and small villages (as determined through the Settlement Hierarchy Topic Paper (2015)). The buffers identify the areas outside existing towns, large villages and small villages which could access key services and therefore might theoretically be suitable for development. These buffers are used to determine whether sites are deemed to be a sustainable location within the District. 15. We have some concerns in respect of the above approach, and the resultant rejection of sites such as SR-0154. As noted above, Toot Hill is an established rural community. It has some facilities, and it is important that these be supported by the planning system as far as possible, in the interests of the vitality of the village. The approach taken by EFDC appears to exclude the possibility of any growth in villages such as Toot Hill. Whilst it is accepted that it would be appropriate to direct larger, strategic growth to more substantial settlements with a greater range of facilities and services, this does not mean it is appropriate to stifle any potential growth of other communities. In fact, we consider such an approach is contrary to national policy, as explained below. 16. The NPPF makes clear that one of the core planning principles that should underpin both plan-making and decision-making is the need to support rural communities: "Planning should... take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it". (NPPF paragraph 17, emphasis added). 17. The NPPF also requires planning policies to support economic growth in rural areas through ensuring retention and development of local services and facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship (paragraph 28). 18. Further to the requirements of the NPPF, the National Planning Practice Guidance (NPPG) explains how Local Planning Authorities should support sustainable rural communities. This states (at paragraph: 001 Reference ID: 50-001-20160519): "It is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements." And "A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities." (Emphasis added). 19. Having regard to the above, it is considered wholly inappropriate for the DLP to automatically dismiss sites that would provide housing for **Redacted....**. Overview and conclusion 20. The DLP fails to meet the District's objectively assessed housing need. If the Local Plan is ultimately to be found sound, it must plan for a greater number of new homes than the DLP proposes. Accordingly, sites that have been rejected through the site assessment process, such as SR-0154, should be reconsidered. 21. SR-0154 is not subject to any constraints that prohibit its development, except for existing policies in the current, out-of-date Local Plan. It is adjacent to existing housing, and the development of new homes fronting Epping Road would be very much in-keeping

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with the character of the area, continuing an existing pattern of development along the road. 22. The rejection of site SR-0154 through the site selection process is not considered justified. The approach of directing no new development to **Redacted....** over the period 2011-2033 is considered harmful to the community's vitality, and is contrary to national policy. 23. The allocation of site SR-0154 for housing would assist in addressing the above concerns, identifying a suitable, achievable and available site to make a modest contribution to homes in the village, in a manner that would have no negative impact on its existing character.