29 January 2018



Local Plan Regulation 19 Representation Planning Policy Team Epping Forest District Council Civic Offices 323 High Street Epping Essex CM16 4BZ



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Epping Forest District Council Submission Version Local Plan

We write on behalf of Crest Nicholson in relation to the site known as the former Pickfield Nursery at Pick Hill, Waltham Abbey (SLAA Reference SR-0161).

Flawed / Absent Local Plan site selection process to-date:

Pickfield Nursery was submitted to EFDC in response to the Call for Sites consultation in 2008 and has subsequently been promoted through the current Local Plan process since its inception in 2012. EFDC's July 2012 SLAA referred to Pickfield Nursery as site SR-0161 but incorrectly identified it as a duplicate site with a much larger parcel (SLAA Reference SR-0020). Representations were then submitted in October 2012 highlighting this mistake.

However, despite the submission of detailed representations and subsequent regular liaison with EFDC's officers (including a positive formal pre-application meeting), EFDC's Site Selection evidence base published in 2016 discounted Pickfield Nursery prior to Stage 1 of the selection process, once again incorrectly considering it as a duplicate site.

Pickfield Nursery was finally acknowledged as an individual site in the Local Plan evidence base in the "Sites for consideration following Regulation 18 consultation" list published in July 2017. However, at the time of writing these representations (26th January 2018, one working day before the Pre-Submission consultation deadline) an assessment of these sites has still not been undertaken and Appendix C1 of the Report on Site Selection (December 2017) has not been completed.

In the absence of evidence base work relating to site selection, the Local Plan is considered unsound as it is not *Justified*. Despite the submission of detailed representations since 2012, Pickfield Nursery has unexplainably still not been assessed in any form.

As EFDC's reasons for omitting the site have not been published, we cannot provide a rebuttal at this stage. However, these representations summarise why Pickfield Nursery cannot reasonably be omitted on the following grounds:

Sustainability

EFDC's Sustainability Appraisal (December 2017) indicates that the northern expansion of Waltham Abbey is preferable as it can "support development within close proximity to existing town centre services whilst minimising harm to the Green Belt'. This is supported in principle but the Local Plan fails to acknowledge the recent planning consent for 79 units within the Green Belt at Knollys Nursery (application EPF/1162/15). Knollys Nursery lies immediately to the east of Pickfield Nursery further away from Waltham Abbey's Town Centre services. However, it was concluded by EFDC that it represents a sustainable residential location, and was subsequently approved.





Pickfield Nursery cannot therefore be reasonably omitted on sustainability grounds.

Landscape / Green Belt impact

EFDC's Sustainability Appraisal (December 2017) indicates that the northern expansion of Waltham Abbey is preferable but that "Part of this strategic option is sensitive to change in landscape terms, as evidenced by the Settlement Edge Landscape Sensitivity Study (2010), which concluded that the landscape to the north-east of Waltham Abbey is highly sensitive to change".

However, this 2010 Study assesses a significantly greater parcel than Pickfield Nursery and precedes the Knollys Nursery application which has since been consented within this "sensitive landscape" to the north-east of Waltham Abbey.

In relation to Pickfield Nursery, EFDC's Development Control and Landscape officers have assessed the site through the pre-app process stating "The horticulture use has ceased (1987) leaving the site in a poor state of disrepair that is extensively covered with broken glass and rubble. The information was referred to the Council's trees and landscape officer. It was stated that the site had very little vegetation within its boundaries that is worthy of protection and that the site appears well located within the landscape so as not to be excessively visually intrusive. In principle therefore on landscape grounds there were no objections to the proposal. The buffer zone required by the Environment Agency which requires the development to be setback from the brook, would allow for the opportunity to provide a large area of landscaping in addition to the soft landscaping throughout the site.

It is acknowledged that the visual impact of the development would likely be significantly less than on the adjacent Knollys site and that there are potentially significant environmental and social benefits from the scheme which need to be fully explored."

The former Pickfield Nursery represents a logical extension to an established residential area and benefits from permanent boundaries on all sides including Cobbins Brook to the north. The site is an eyesore and offers no value to the local environment or the purposes of the Green Belt, as illustrated within our previously submitted Design Development Framework (please see **Appendix 1**).

Pickfield Nursery cannot therefore be reasonably omitted on landscape / Green Belt impact grounds.

Flood Risk, Highways and Ecology

Crest has worked closely with the EA to remodel Cobbins Brook's flood risk zone and they have confirmed that all developable areas are acceptable (as per their letter confirmation previously submitted to EFDC).

Crest has also liaised closely with ECC Highways who have confirmed that site access and surrounding capacity are entirely suitable (when also taking into account the Knollys Nursery consent).

Crest has been in discussions with Natural England who acknowledge the significant environmental and ecological benefits associated with enhancing the dilapidated site including the cleaning of Cobbin's Brook and the provision of a wildlife corridor.

Pickfield Nursery cannot therefore be reasonably omitted on flood risk, highways or ecological grounds.

Social and economic impacts

In addition to the clear environmental benefits associated with enhancing a longstanding derelict site in a poor state of disrepair, significant economic benefits would be delivered including the New Homes bonus (over one million pounds) and additional resident expenditure in local shops and services. The site is covered with significant areas of hardstanding, broken glass, rubble, unmaintained shrubland and potential contamination, and therefore the high cost of remediating the site precludes any form of future non residential use. In short,



should Pickfield Nursery not be allocated for housing through the Local Plan process, it will be left to deteriorate and the unique opportunity to deliver significant environmental, economic and social benefits will be lost.

Social benefits include the removal of the unattractive, unsafe site and the provision of new public open space and a wildlife corridor linked to Cobbins Brook and the wider PRoW network. As EFDC are aware Crest has also been working closely with the adjacent Paternoster House care home whose residents will benefit from direct access to site.

As contained in their letter previously submitted to EFDC, they fully support Crest's proposals stating "The layout maximises access to outdoor space which will be hugely beneficial in creating a new positive and therapeutic atmosphere for our residents. Access to fresh air and additional outdoor space, and subsequent opportunity for reflection and social engagement all play a significant role in supporting well-being and recovery. Crest Nicholson have agreed to continue to work with us to develop landscaped areas that will feature raised planting, textured shrubs and park-like spaces in a unique environment adjacent to a Brook. These areas will increase the variety of activities and outdoor exercises we can cater for.

The former Pickfield Nursery proposals reflect the obvious type of development for the run-down site, and for the above reasons, we urge you to support the proposals."

Pickfield Nursery cannot therefore be reasonably omitted on economic or social grounds.

Housing need at Waltham Abbey

A Local Housing Needs Assessment for Waltham Abbey has been undertaken by specialist consultants Barton Willmore (attached at **Appendix 2**).

Demographic modelling and accompanying analysis concluded that demographic-led housing need in Waltham Abbey is between 2,373 and 2,508 dwellings, 2011-2033. The Submission Plan proposals for 858 dwellings will fail to support the Plan's 'Vision' for Waltham Abbey and result in a decline of both the child age and working age population (in the context of a significant increase in the elderly). Waltham Abbey currently represents 14.9% of the District's population. Applying a straightforward pro-rata approach to allocating need to Neighbourhood areas as proposed in the Government's 'Planning for the right homes in the right places' consultation, Waltham Abbey would require a need for 1,698 dwellings – nearly double the proposed allocation in the Submission Plan (858 dwellings).

Pickfield Nursery cannot therefore be reasonably omitted due to a lack of local housing need at Waltham Abbey.

Delivery

The proposed "Waltham Abbey North Masterplan Area" is not objected to in principle as it acknowledges that the northern expansion of Waltham Abbey is preferable and supports the release of former glasshouse sites like Pickfield Nursery. However, the early delivery of the Masterplan Area is questioned given its multiple ownership, the non residential uses required onsite including education, and necessary highways enhancements.

In contrast, Pickfield Nursery is in single ownership and statutory consultees have confirmed that no local infrastructure upgrades are required to facilitate early delivery. Crest Nicholson are a locally based national housebuilder with an excellent reputation (National Housebuilder of the Year twice in the last three years) and Pickfield Nursery represents an excellent opportunity to provide much needed private and affordable new homes in the short term.

Pickfield Nursery cannot therefore be reasonably omitted due to concerns regarding delivery

Conclusion: Local Plan amendments being sought



The former Pickfield Nursery represents a unique opportunity to deliver significant environmental, economic and social benefits at a well contained, sustainably located site covered in hardstanding, broken glass and rubble following 30 years of dereliction.

Despite Crest Nicholson's promotion of the site through the Local Plan process since its inception in 2012, EFDC has still not assessed it due to a series of administrative errors.

As detailed under each subheading above, there are not considered to be any sound grounds for the site's omission from allocation in the Local Plan. Crest Nicholson's proposals are supported by statutory consultees and local stakeholders, and have been informed by positive pre-application advice from EFDC's Development Control and Landscape officers.

Therefore, in order to make the Local Plan Sound, the following amendments are considered necessary:

- The identification of Pickfield Nursery as residential allocation WAL.R9 for approximately 90 homes under "Policy P 3 Waltham Abbey" (short term delivery within first five years of Plan period).
- The identification of consented site Knollys Nursery as allocation WAL.R8 which the Local Plan currently ignores.
- Amendment to "Map 5.6" to reflect the above, as shown at **Appendix 3** attached.

Yours sincerely

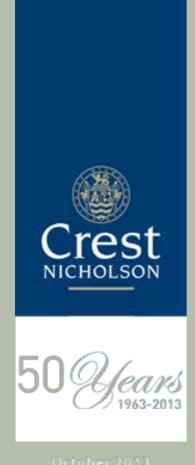


Ben Thomas Associate Director

CC Mark Bedding - Crest Nicholson

Appendix 1: Design Development Framework







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Introduction

Residential Development

This document has been prepared by Crest Nicholson, in support of the proposed residential redevelopment of the former Pickfield Nursery site. The site is located at Pick Hill in Waltham Abbey, and is currently being considered as part of the preparation of the emerging Epping Forest Local Plan. The latest iteration is the 'Issues and Options' document published for consultation in July 2012.

This document demonstrates that the former Pickfield Nursery site represents a sustainable, deliverable and logical site for residential allocation in the emerging Local Plan.

Crest Nicholson is one of the UK's premier house builders. They have assembled a team of leading advisors, including Savills Planning and Clague Architects, to assist with developing proposals to make the very best of the unique opportunity to deliver a high quality and sustainable new residential development within Epping Forest. The proposed development would contribute towards meeting the significant settlement-specific and district-wide housing needs.





Introduction

Project Team





Developer - Crest Nicholson











curtin&co

Architect - Clague LLP

Planning Consultant - Savills

Civil Engineering - Ardent

Landscape & Visual Impact - Barton Willmore

Community Relations Consultant - Curtin & Co

O2 Context Site & Surroundings

subsequently one of the focuses of future housing growth.

and fixed physical features create existing boundaries on House Care Home to the west, a small commercial operation to the east and Cobbins Brook (forming a permanent boundary) to the north. These boundaries are reinforced into the open countryside.

natural and logical extension to the existing settlement boundary.





Context

Planning History

02

As noted to the right, the site has been the subject of a wide range of planning submissions since the mid-20th century. A brief summary of the key applications appears below, with built developments highlighted in bold:

Year: 1955	Summary: Erection of temporary bungalow	Ref: WHX/0155/55	Decision: Granted	
1957	Erection of 18 no. semi-detached bungalows	WHX/0098/57	Granted	
1968	Erection of 12 no. glasshouses (inc. presumed change of use)	WHX/0047/68	Granted	
1980	Residential development	EPF/0460/80	Refused	
1983	Outline application for residential	EPF/1018/83	Refused	
1991	30ft extension of rear gardens to Nos. 19-35 Pick Hill (inc. change of use from agricultural to domestic curtilage)	EPF/0214/91	Granted	
2001	Erection of 2m high security gates	EPF/1721/01	Refused	

There have been a number of significant planning approvals (including change of use from agricultural to nursing/care home) on land to the west.

Year: 1971	Summary: Outline application for residential	Ref: WHX/0327/71	Decision: Refused
1990	Erection of 140-bed Nursing Home (inc. change of use to care home)	EPF/0850/90	Granted
1994	External illumination to existing sign	EPF/0022/94	Granted
1994	Erection of extension to existing Nursing Home	EPF/0810/94	Granted
1996	Erection of garden store within grounds of Nursing Home	EPF/0392/96	Granted
1998	Elevational alterations to existing windows	EPF/0255/98	Granted
2001	Erection of free-standing non-illuminated sign	EPF/0774/01	Granted
2011	Installation of 130 solar-PV panels to rear elevation and internal roofs	EPF/2378/11	Granted





Existing Pickfield Nursery Site.

site comprises predominantly previously developed land. From the 1960s up until the 1980s, the site was used as a commercial plant nursery. Its operations declined during the 1980s, and in October 1987, a number of glasshouses were destroyed in 'the great storm' and all commercial activity on the site ceased shortly afterwards.

Although within the Green Belt, the former Pickfield Nursery

Today, approximately 2.5 hectares of the site still consists of hard-standing and foundations associated with the former glasshouses. It is now overgrown and extensively covered with broken glass and rubble, representing a safety hazard and a visual blight on the landscape.

Although not within the curtilage of Pickfield Nursery, an application for an adjoining site was granted planning permission in 1990 for the construction of a 140 bed nursing home, now known as Paternoster House Care Home. Prior to the consent for the care home, the site was also a vacant former nursery, comprising previously developed land within the Green Belt.

The NPPF (adopted March 2012) sets out the Government's current and future requirements for significantly boosting the country's supply of housing, in order to facilitate nationwide economic growth.

Since its adoption, the Planning Inspectorate (PINS) have reinforced this requirement to deliver new homes. PINS have also made it clear that failure to meet "objectively assessed need" (OAN) for new housing cannot be justified by constraints that are not fixed. These unfixed constraints include transport capacity and landscape impact, and have applied even in the case of Green Belt (Halton, Hertsmere, Rushcliffe, Waverley and Coventry), where housing need outweighs its protection.

In order to meet the significant OAN identified in the District, Green Belt land release will be required to accommodate housing, particularly on sites that benefit from permanent site boundaries and do not contribute to the functions of the Green Belt, such as the former Pickfield Nursery site

Planning Policy

National Planning Policy Framework (NPPF)

The NPPF establishes key priorities to "boost significantly the supply of housing" "meet the needs of present and future generations" and "widen the choice of high quality homes". It also places significant weight on sustainable economic growth - both in terms of new economic development and new homes.

Paragraph 47 states that Local Planning Authorities (LPAs) should use their evidence base to ensure that OAN for market and affordable housing in the housing market area is met.

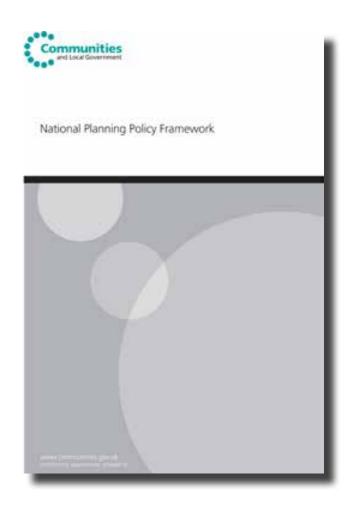
LPAs should also identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. The NPPF also states that LPAs must 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, LPAs should 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 own target.

Regarding designated areas of Green Belt, the NPPF sets out in paragraph 83 that LPAs with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for settlement policy. It states that Green Belt boundaries should only be altered in "exceptional circumstances" and "through the preparation or review of the Local Plan". If under review, it is recommended that the local authority "not include land which it is unnecessary to keep permanently open", and "define boundaries clearly, using physical features that are readily recognisable and likely to be permanent".

In accordance with the above national planning context, PINS Inspectors continue to reinforce the NPPF's key message to significantly boost housing supply (examples include Blaby, Denbighshire, Kirklees, Rushcliffe, Coventry, Melton and Waverley). Adverse impacts of loss of agricultural land and non-designated countryside are outweighed by the benefits of housing development to meet OAN (Blaby, Denbighshire), even in the case of Green Belt (Halton, Hertsmere, Rushcliffe, Waverley, Coventry) unless there are clear physical and environmental fixed constraints (Eastbourne, Shepway) or National Park and European habitat designations (Wealden).

In accordance with the NPPF, EFDC have considered how this requirement to meet OAN can be accommodated through a number of growth options requiring Green Belt land release. This is explored in the following pages.



Planning Policy

District-Wide Planning Context

The NPPF states that Local Plans should "plan for a mix of housing based on This significant housing shortfall emphasises the necessity for early identification of current and future demographic trends, market trends and the needs of different groups in the community" to reflect "local demand".

The abolished East of England Plan set an annual housing delivery target for EFDC of 175 dwellings per annum, giving a 5-year target of 875 new dwellings. EFDC's latest housing trajectory (January 2013) demonstrates that although they have exceeded their 5-year housing target, EFDC would have been unable to demonstrate a future 5-year housing land supply against this abolished and insufficient per-annum target.

The requirement to meet OAN in accordance with the NPPF means that a much greater per annum target will be required which will increase this projected housing shortfall further.

Based on recent Government figures used to determine OAN, approximately 6,680 additional homes will be required within the District between 2011-2021 (circa 670 dwellings per annum). This equates to a minimum requirement for an additional 13,400 dwellings from 2013 to EFDC's suggested Local Plan period up to 2033.

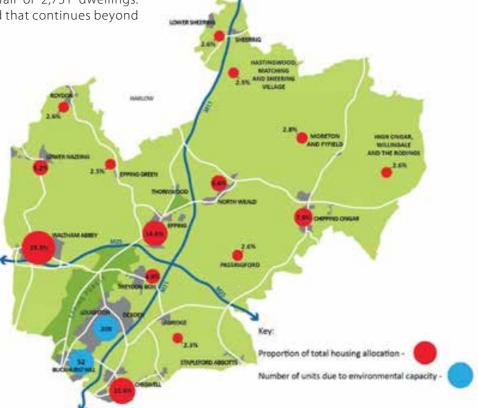
This NPPF compliant housing target generates a 5 year land supply requirement of 3,518 dwellings (including the 5% buffer). However, EFDC's latest housing trajectory identifies a future 5 year housing supply (2012/13-2017/17) of only 787 units. This represents a significant housing shortfall of 2,731 dwellings. Therefore, only 22% of OAN can be accounted for, a trend that continues beyond this 5 year period.

sustainable and deliverable development sites within the emerging Local Plan.

Notwithstanding the increasing district-wide housing shortfall, the NPPF requires local authorities to assess locally generated (settlement-specific) housing needs to inform the distribution of housing across the District. Waltham Abbey is considered by EFDC as a Principal Town, meaning that alongside Epping and Loughton, it is 'top' of the settlement hierarchy. Waltham Abbey will therefore be expected to provide a significant contribution towards addressing the District's housing shortfall.

EFDC's 'Issues & Options' Consultation Document (July 2012) identifies a number of potential strategic "Spatial Options" to accommodate housing need across the District.

Spatial Option 1 ("Proportionate Distribution") illustrated below represents a sustainable approach as it considers focussing growth at settlements with the highest population and level of supporting services (unless they are constrained environmentally), in accordance with the principles of the NPPF. This identifies that Waltham Abbey should accommodate approximately 25% of the District's overall level of growth. It should be noted that Option 1 was the most popular following formal consultation on the Issues & Options Local Plan document (supported by over 600 respondents).



EFDC's emerging Local Plan is currently at the "Issues & Options" stage. Accordingly, EFDC have yet to define specific housing targets, however Government figures used to determine OAN suggest a requirement to deliver approximately 670 dwellings per annum (13,400 dwellings between 2013 and 2033). This is significantly higher than the 175 dwelling per annum target set by the abolished East of England Plan.

The Council is currently in the process of confirming the level of growth required to meet OAN as confirmed at the Cabinet meeting on the 9th September 2013 which states "Epping Forest District Council must determine the Objectively Assessed Housing Need of its own area, using robust demographic, housing and economic evidence."

Waltham Abbey has been identified as a Principal Town by Epping Forest District Council within the Settlement Hierarchy. This status means that the town will make an important contribution towards meeting the District's housing needs, as well as projected needs at a settlement-specific level.

In order to meet the District's significant housing shortfall against OAN, Green Belt land will need to be released around Waltham Abbey. There is also a requirement to meet local, settlement specific housing needs to address localised affordability issues and retain the viability and vitality of local shops and services.

As set out within the "Issues & Options" Consultation Document (July 2012) and identified to the right, there is a projected need up to 2033 for between 1,645 and 2,539 additional dwellings at Waltham Abbey based on Government projections.

In order to accommodate this housing need, EFDC also published a number of strategic growth options for Waltham Abbey as part of the Issues and Options document.

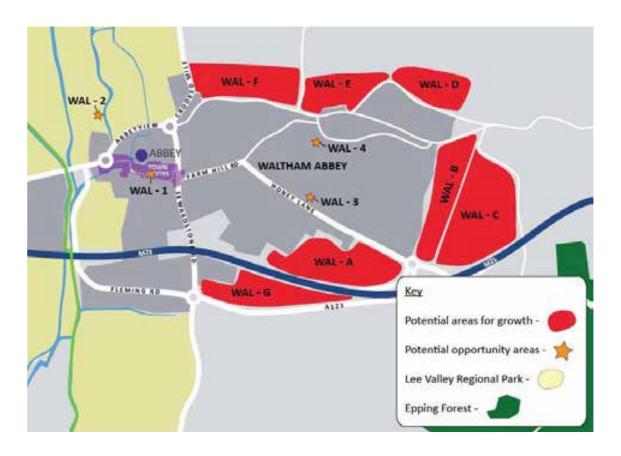
An extract is contained to the right.

Planning Policy

Settlement-Specific Planning Context

			Housing (ad	dditional ho	mes requi	red)		Employment (additional hectares of land required)					
Proportionate Distribution - allowing for constraint	A) Official population		B) Combined East of England Plan / Update of population projections		C) Adopted East of		% Distribution of remainder in non- constrained	1) East of England Plan		2) Need identified by Evidence Base		% Distribution of remainder in non- constrained	
	No growth	Growth at	No growth	Growth at	No growth	Growth at		No growth	Growth at	No growth	Growth at	wards	
	at Harlow	Harlow	at Harlow	Harlow	at Harlow	Harlow		at Harlow	Harlow	at Harlow	Harlow		
Broadley Common, Epping Upland & Nazeing	252	164	219	131	156	67	2.5%	0.724	0.534	0.546	0.356	2.5%	
Buckhurst Hill	52	52	52	52	52	52	constrained	0.000	0.000	0.000	0.000	constrained	
Chigwell	1,555	1,007	1,351	804	960	413	15.6%	4.458	3.289	3,363	2.194	15.6%	
Epping (inc Thornwood Common)	1,453	941	1,263	751	897	386	14.6%	4.165	3.074	3.142	2.051	14.6%	
Hastingwood, Matching & Sheering Village	249	161	217	129	154	66		0.715	0.527	0.539	0.352	2.5%	
High Ongar, Willingale & The Rodings	263	170	228	136	162	70	2.6%	0.753	0.556	0.568	0.371	2.6%	
Lambourne	229	149	199	119	142	61	2.3%	0.658	0.485	0.496	0.324	2.3%	
Loughton	209	209		209	209	209	constrained	0.000	0.000	0.000	0.000	constrained	
Lower Nazeing	514	333	447	266	318	137	5.2%	1.474	1.088	1.112	0.726	5.2%	
Lower Sheering	260	168	226	134	161	69	2.6%	0.746	0.550	0.563	0.367	2.6%	
Moreton & Fyfield	278	180	242	144	172	74	2.8%	0.797	0.588	0.601	0.392	2.8%	
North Weald	559	362	486	289	345	148	5.6%	1,603	1.183	1.210	0.789	5.6%	
Ongar	779	505	677	403	481	207	7.8%	2.233	1.648	1.685	1.099	7.8%	
Passingford	263	170	228	136	162	70	2.6%	0.753	0.555	0.568	0.371	2.6%	
Roydon	258	167	224	133	159	68		0.740	0.546	0.558	0.364	2.6%	
Theydon Bois	489	317	425	253	302	130		1.401	1.034	1.057	0.690	4.9%	
Waltham Abbey	2,539	1,645	2,207	1,313	1,568	674	25.5%	7.280	5.372	5.492	3.584	25.5%	
	10,200	6,700	8,900	5,400	6,400	2,900	100.0%	28.500	21.030	21.500	14.030	100.0%	

^{*} figures may not sum due to rounding



Development & Delivery

Strategic Housing Land Availability Assessment (SHLAA)

As part of EFDC's SHLAA, Pickfield Nursery was considered within a wider site, called Land at Paternoster Hill (SR-0020) as part of potential growth area WAL-E. This wider site is much larger, more open in nature and contains a flood risk zone through its centre. As a result, Land at Paternoster Hill is only given a medium ranked sustainability score in comparison to other sites. Savills on behalf of Crest Nicholson have independently reassessed Pickfield Nursery as a separate site, using EFDC's own SHLAA sustainability scoring method. As a result of assessing this much smaller, more contained site with unique previously developed characteristics, Pickfield Nursery (along with Abbeyview Nursery) is considered the most suitable Green Belt site around Waltham Abbey.

As part of the Issues and Options Consultation, EFDC's Landscape and Trees department objected to WAL-A, B, C, and D due to high landscape character sensitivity. For example, in relation to WAL-D (to the east of Pickfield Nursery), EFDC state "this area is stated as having high landscape character sensitivity and moderate visual sensitivity, and so combined high sensitivity. In addition to the direct landscape character implications, the site can only be accessed by a narrow lane. To develop this area it is likely that an improved road system would be required, with potential adverse impact on the adjacent hedgerows. The site contains a network of mature hedgerows and trees (some veteran) and a small wood. As such it is unsuitable for development."

However, there is no objection to WAL-E (Pickfield Nursery). WAL-E is stated as being "of moderate landscape character sensitivity and moderate visual sensitivity, and so combined moderate sensitivity. As the site is on the lower slopes the detrimental impact on the surrounding landscape should be containable with suitable landscaping."

Furthermore, as part of the Planning Statement for the recent application for development at Knolly's Nursery (part of WAL-D), the applicant acknowledged that WAL-E represents the most sustainable option for short term residential development within Waltham Abbey.



Existing view across site showing demolished glasshouses

04

The "Issues & Options" Consultation Document (July 2012) identifies a number of potential areas of growth at Waltham Abbey to meet the significant District-wide and settlement specific need outlined on pages 9 and 10.

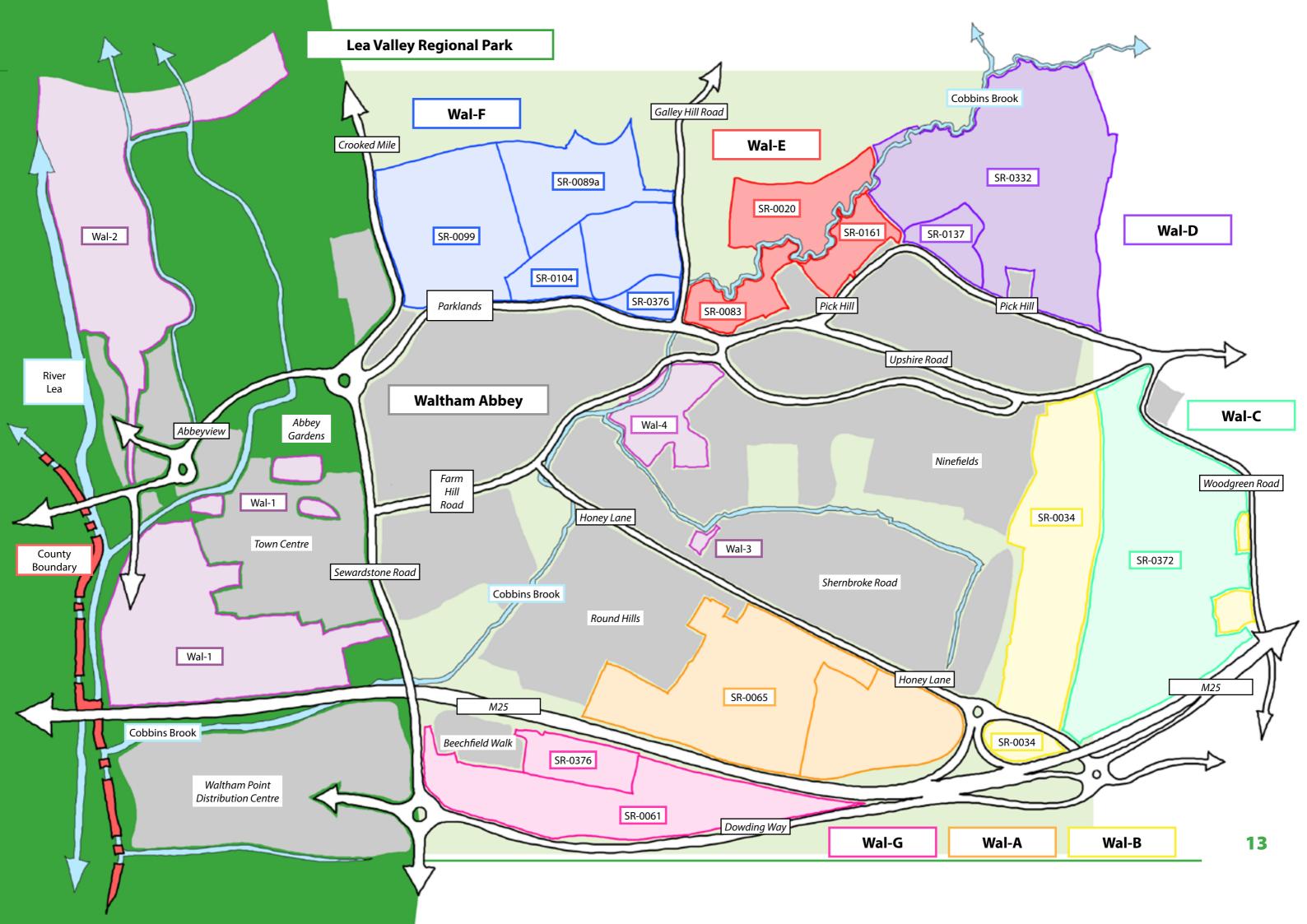
Within the strategic growth locations identified previously, individual sites have been assessed by EFDC as part of their Strategic Housing Land Availability Assessment (SHLAA). These are discussed on the left, and illustrated on the following pages.

04 Development & Delivery Strategic Land Availability Assessment

Rank	Site	SLAA Reference (Issues & Options Area)	EFDC Suggested Dwelling Capacity	Available?	EFDC Suggested Delivery Timescale	
=1	Pickfield Nursery (see note 1 below)	SR-0161 (Wal-E)	100	Yes	0 - 5 years	
=1	Abbeyview Nursery	SR-0376 (Wal-F)	81	No	N/A	
3	Land off Beeching Walk	SR-0370 (Wal-G)	139	No	N/A	
4	Land adjoining Parklands	SR-0104 (Wal-F)	150	Yes	0 - 5 years	
=5	Galley Hill Road Industrial Estate	SR-0375 (Wal-E)	130	No	N/A	
=5	Lea Valley Nursery	SR-0099 (Wal-F)	100	Yes	0 - 5 years	
=5	Land adjacent A121	SR-0061 (Wal-G)	758	Yes	0 - 5 years	
=8	Land South of Honey Lane	SR-0065 (Wal-A)	685	Yes	5 - 10 years (land assembly constraints)	
=8	Knolleys Nursery	SR-0137 (Wal-D)	120	Yes	0 - 5 years	
10	Land West of Galley Hill Road	SR-0089a (Wal-F)	341	Yes	0 - 5 years	
=11	Land at Paternoster Hill (see note 2 below)	SR-0020, 0083, 0161 (Wal-E)	260	Yes	0 - 5 years	
=11	Land to East of Waltham Abbey	SR-0034 (Wal-B)	500	Yes	0 - 5 years	
13	Land to North-East of Waltham Abbey	SR-0332 (Wal-D)	847	No	N/A	
14	Land to West of Wood Green Road	SR-0372 (Wal-C)	950	No	N/A	

^{1.} Sustainability Score for Pickfield Nursery independently assessed by Savills on behalf of Crest Nicholson, based on EFDC scoring methodology

^{2.} Sustainability Score includes Pickfield Nursery



As seen on previous pages, it is evident that former and deliverable opportunity to deliver much needed, high

Pickfield Nursery adjoins the existing residential settlement boundary, including Paternoster House Care regeneration of a former derelict nursery site), and would stands, the poorly maintained, and potentially hazardous site represents a logical housing site between the Pick Hill residential area and Cobbin's Brook to the north. The site's permanent existing boundaries mean that residential development will not represent sprawl into open Green Belt land.

Its redevelopment would also significantly enhance the existing environment, improve local access and pedestrian linkage to the countryside, and provide ecological enhancements to Cobbin's Brook.

Given its previously developed status, collective problems, and 25 year dereliction, it is not anticipated that residential development at the former Pickfield Nursery site would set a precedent for any other Green Belt development in the District, as the site has very unique circumstances.

Development & Delivery

Principle of Development

The former Pickfield Nursery site has been vacant for the last 25 years. It is an accordance with the Green Belt policies identified in the NPPF. eyesore and offers no value to the local environment as illustrated in the images below. It does not therefore contribute to the purpose and functions of the Green Belt in accordance with the NPPF.

The high cost of remediating the site, including the removal of hard-standing, glass, rubble and shrubland, precludes any form of future commercial horticultural use. This common issue is reflected in EFDC's study of the Glasshouse Industry

The Former Pickfield Nursery site has the potential to become an enclosed, natural extension to Waltham Abbey, bounded by the picturesque Cobbin's Brook. The Brook and its flood plain will create a permanent defensible boundary to the north, in

In order to mitigate any flood risk, a landscape buffer will be incorporated adjacent to Cobbin's Brook. With this excluded from the developable area of the site, Pickfield Nursery will be able to deliver a low to medium density scheme of approximately 90 dwellings.

The site can be delivered in the short term and can therefore make an important contribution to the district and settlement's housing need as well as creating a number of significant environmental and socio-economic benefits.



Demolished glasshouses - poor quality character



Structure of water-tower, impacting on dwellings



General debris accumulated on-site due to neglect



Structurally unsound derelict building

Development & Delivery

Developable Area

04



A thorough analysis of the opportunities and constraints of Pickfield Nursery as a residential development site has been carried out in order to design a proposal that can deliver the best quality and most sustainable development. As a result, and as shown on the diagram to the left, a non-developable area has been designated to accommodate a 'buffer zone', comprising both the extent of Flood Risk Zone 3a (generated by flood risk modelling based on the site topographical survey) and a significant area of existing dense mature woodland to the northern boundary with Cobbin's Brook.

As well as protecting any proposed development from flood risk, this non-developable area also acts as a natural barrier between development and the open Green Belt north of Cobbin's Brook and forms an important element of the site's 'green strategy' (page 23).

Connectivity

The Site

The town centre of Waltham Abbey is a 2km walk, cycle or bus journey from Pick Hill via Paternoster Hill, Broomstick Hall Road and Farm Hill Road.

Located just over 1km (13-minute walk) from the site southeast of Pick Hill is a parade of shops including a convenience store, fast food restaurant and newsagent.

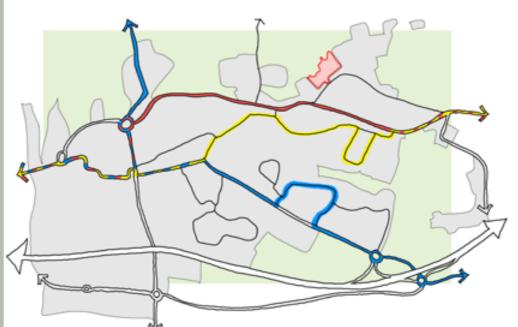
There are two primary schools located within a 1.2km (15-minute) walk from the site access and a secondary school a 10-minute walk away. Waltham Abbey Sports Centre and other recreational facilities are located within a 5-10 minute walk from the site.

In view of the level of site accessibility for 'non-car' modes of travel, the site is well suited to residential development with many local facilities close by, including schools, and shops. Development would therefore be compliant with current policy guidance on transport and land use planning at both a national and local level.

The closest bus stops to the site are on Paternoster Hill within a 2-3-minute walk of the site access, which serve the hourly bus route no. 213 (shown yellow) between Epping and Waltham Cross Bus and Rail Stations. There are two other local bus routes, the frequent no. 251 (shown red) and hourly no. 555 (shown blue), within a 5-minute walk of the site, with related bus stops located on Broomstick Hall Road and Ninefields. These bus routes have good accessibility to neighbouring settlements such as Harlow and Cheshunt and connections to Waltham Abbey town centre and Waltham Cross Bus and Rail Stations.

The closest Rail Station is Waltham Cross, around a 3.5km distance west of the site. It is on the West Anglia Main Line with services operated by Greater Anglia, with up to 6 trains to London per hour at peak times.

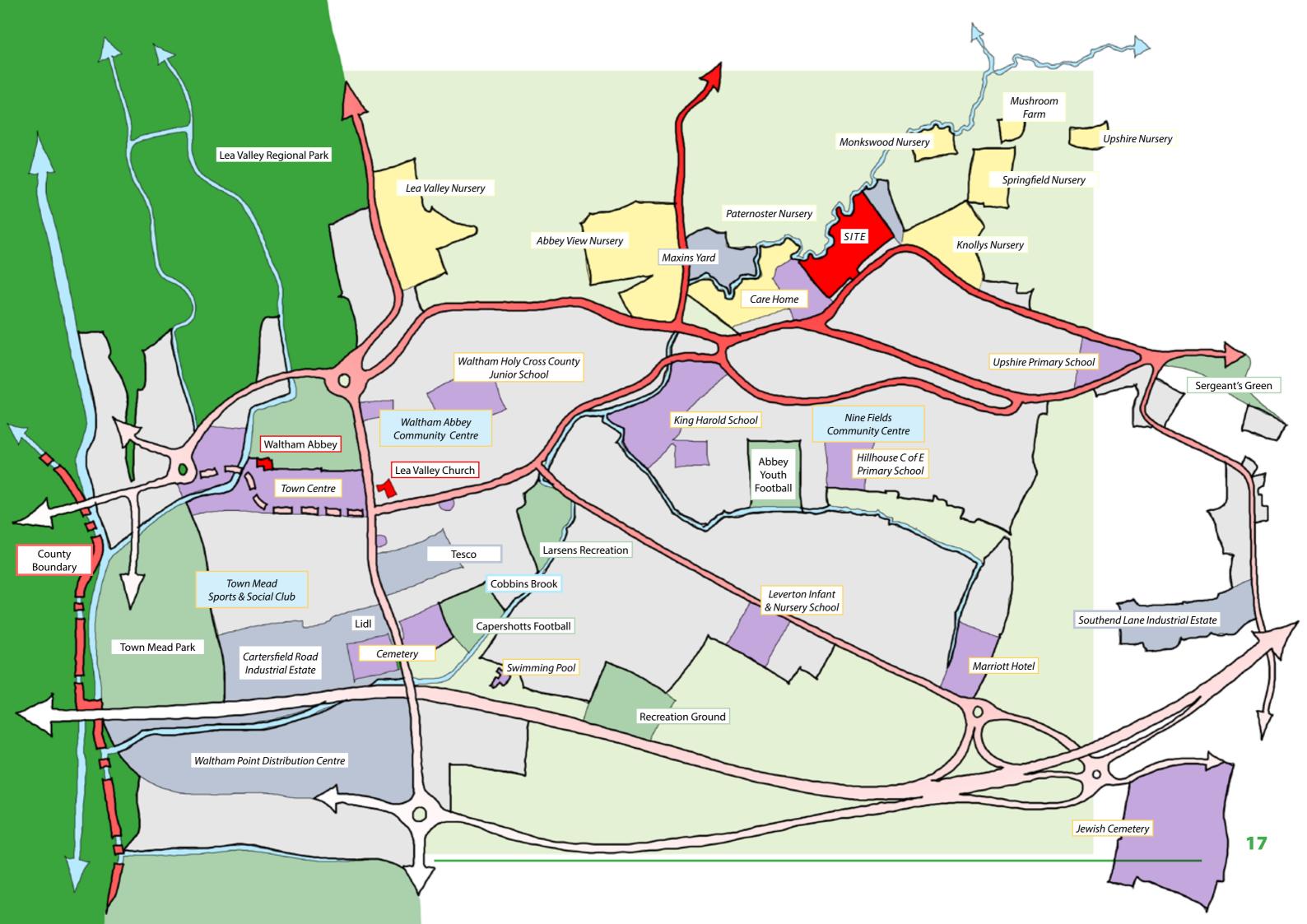
The closest cycle route to the site is National Cycle Network (NCN) route 1; The route heads north out of London along the Lea Valley cycle route passing through Waltham Abbey along Meridian Way and alongside Old River Lea into Hertfordshire.







Vehicular Links through Waltham Abbey



O5 The Site Site Photographs







Unused equipment associated with former glasshouses Severely overgrown and structurally unsound glasshouse





General industrial debris accumulated on-site due to neglect

View across the site of Demolished glasshouses - poor quality character

The Site Site Photographs



Poor quality landscape character created by remaining glasshouse structure





General debris and dilapidated structure of former ancillary building



General inudstrial debris accumulated on-site due to neglect

An appraisal of access opportunities carried out by Ardent Consulting Engineers demonstrates that a residential development of around 100 units could be accessed safely from Pick Hill via an improved priority 'T' junction at the

There is an opportunity for secondary access for pedestrians, cyclists and emergency vehicles at the northern end of Pick Hill linking to existing public footpath No 31.

point of existing access to the former Pickfield Nursery.



The Site

Transport

Primary pedestrian access would be taken directly from Pick Hill alongside the vehicular access. Pick Hill has lit footways as do most roads in the local area. There is an opportunity to provide dropped kerbed crossings with tactile paving on the northern footway of Upshire Road at junctions with Harriers Court, Allison Close, Maple Springs and Princes Field Road to ease pedestrian movement along this route to local shops and Upshire Primary School.

There is an opportunity to provide a zebra crossing on Paternoster Hill between Pick Hill and Broadgate which would provide a safe crossing for pedestrian access to the westbound bus stop (route 213) as well as local schools and Waltham Abbey town centre. To further improve the pedestrian route to the westbound bus stop, dropped kerbed crossings with tactile paving could also be provided either end of the service road to the rear of the bus stop on Paternoster Road.



Ardent Consulting Engineers has made contact with all utilities companies likely to have plant in the area. Based upon the record plans received, a review of the access appraisals and correspondence with the various utilities companies, no diversions are anticipated to facilitate the development.

National Grid, UK Power Networks and Thames Water supply the area with Gas, Electricity and Potable Water. National Grid and UK Power Networks have confirmed that local connections can be made to serve the site without the need for offsite reinforcement works. Thames Water has asked for additional time to carry out pressure testing in the area before they can confirm capacity exists within the supply network.

Ardent Consulting Engineers are currently preparing a drainage strategy, in coordination with the Environment Agency and Essex County Council, to serve the future development.

Previously, the majority of the site was taken up by greenhouses and areas of hard-standing which discharged to Cobbins Brook via a network of drains. Surface Water from the proposed development will also drain to Cobbins Brook, although the new drainage network will benefit from a number of Sustainable Drainage Systems (SuDS). With the development of the site, the total impermeable area is anticipated to be reduced through the introduction of public open spaces and gardens, this will lead to a reduction in run-off from the site.

SuDS, such as permeable paving, dry basins, ponds and swales will be used to reduce the peak discharge rate to Cobbins Brook, helping to reduce the risk of flooding.

A well designed SuDS strategy will also increase the ecological value of site, whilst improving the water quality of the run-off. The Foul Water drainage system will require a new adoptable pump-station, located within the site and discharging to the existing Thames Water sewers within Pick Hill. Thames Water has confirmed that the local sewers and waste water treatment plant have sufficient capacity to accommodate the new flows from the site and no improvements are required.



The site is located within Flood Zones 1 (<1in1,000 annual risk of flooding), 2 (<1in100 annual risk of flooding), 3a (>1in100 annual risk of flooding) and 3b (functional floodplain). The Technical Guidance to the NPPF recommends that development should be directed away from areas at highest risk of flooding. Residential development is classified as 'More Vulnerable' and should therefore be located outside of Flood Zones 3a and 3b, but is appropriate within Flood Zones 1 and 2.

The site layout will be developed to ensure that dwellings are located away from areas of the site within Flood Zone 3a and 3b. In addition, the floor levels of all dwellings will be set above the 1in100 + Climate Change flood levels, with a 300mm minimum free-board to satisfy the requirements of insurers. These measures will protect the development from the risk of future flooding, whilst the drainage and SuDS strategy will seek to reduce flood risk in the surrounding area.

The Site

Existing Landscape

As emphasised previously, the site, despite its policy designation as Green Belt, is currently in very poor condition. Redevelopment of the site presents an opportunity to rejuvenate a tired, derelict and contaminated eyesore. Its former use as a commercial nursery is evident, with a number of glasshouses in varying states of dereliction across the site: ranging from timber frames with some glazing in tact, to razed buildings with only elements of foundations and hardstanding remaining. There are also extensive areas covered with broken glass, as well as a great deal of assorted debris.

Topographically, the site lends itself well to opportunities for development; the site slopes away from Pick Hill towards Cobbin's Brook, and there is very limited impact on the views looking back at Waltham Abbey from the fields beyond.











- 1. Site screened from existing riverside meadow in neighbouring field (the wider Green Belt)
- 2. View of existing riverside walk within site
- 3. View south over existing derelict glasshouses
- 4. View west along existing river
- 5. View north from site access with long view to ridgeline



The site's boundary to Cobbins Brook is heavily vegetated, formed by areas of dense mature woodland planting with some informal 'footpath' links through to small clearings beside the brook. This planting continues the full length of the western boundary, and decreases in density to form the northern boundary. An existing Public Right of Way runs along the north-eastern edge of the site, linking Pick Hill to a wider network of public footpaths running throughout the Green Belt to the north

There is little planting to the boundaries with the existing dwellings along the east and south. Boundaries to the rear gardens consist of a mix of high brick walls and timber fences

There are some isolated pockets of existing trees within the site, though these are of low landscape value.

Though the site is designated Green Belt, it's current condition, former use and context suggests a number of development opportunities.

The site has existing vehicular access from Pick Hill, suitable to be retained and improved. An existing public right of Pick Hill, connecting beyond Cobbin's Brook to a wider network of footpaths in the Essex countryside.

Cobbin's Brook and its flood risk zone forms a natural buffer zone to the neighbouring fields, and the wider Green Belt.

There is also the opportunity for drainage attenuation the lower points of the site along Cobbin's Brook.



Proposals



Development Strategies





Green Strategy



Movement Strategy

At the heart of these concept proposals is the reinstatement of the site's excellent landscape character, with a number of green spaces linking through the site. These function to either preserve and enhance an existing view, or create a 'green corridor' with landscaped swales linking to the attenuation ponds along Cobbins Brook.

As part of this green strategy, a riverside walk has been created to connect the site with the existing public right of way along the northeastern boundary. It is anticipated that the development will be read as 'pockets' of development set in green spaces, rather than a more typical configuration of green spaces enclosed by built frontage.

movement through the site is in a logical and legible manner befitting the site's character. The need for vehicular activity has been minimised, with an emphasis on pedestrian movement throughout. A network of footpaths links across the site to the riverside walk along Cobbin's Brook and the existing footpath along the north-eastern boundary.

evolved as a result of a rigorous analysis of context, constraints and opportunities. The proposal is design-led and has been informed by initial technical appraisals.

The Concept Layout Plan envisages a sense of 'journey' through the site, utilising a range of different character areas to be experienced as one moves through the development.

These character areas are distinct because of their location, topography, framing of views, or the way in which they address a particular edge. These will then inform the way implemented at a later design stage. We believe that this layout is of well-considered and high- quality design. It is context of Waltham Abbey.





Artist's Impression of view along riverside walk



Artist's impression of view into central green



Artist's Impression of view along green corridor

then informs a structured and legible approach to all planning of the site, right down to the finer detailed

O6 Proposals Community Facility

community facility / day nursery forms a key element of the emerging proposals. Such a use responds to the existing and future demands of the area, as identified by EFDC and the local community. EFDC's 'Open Space and Recreation requirement to provide six new community halls within the District. Following discussions with key local stakeholders, it is evident that there is support for a community facility and nurseries such as the Wishing-Well Pre-School have declared their support and are extremely excited about the prospect of occupying a potential facility as part of the emerging proposals for the former Pickfield Nursery.

The precise use and scale of the facility will be determined following further discussions with the local community, potential occupiers and EFDC's Officers. Any facility will exceed minimum size standards set out in relevant guidance enabling a wide range of potential daytime and evening activities to take place. The high quality facility will be carefully designed to complement residential uses while capitalising on its location adjacent to the enhanced Cobbin's Brook area. This Brook area will create an attractive outdoor space benefitting a number of users. It could for example provide a valuable and unique learning resource for a day nursery.



Local Socio-Economic Benefits

Community-Centric Approach



View of local shops along Highbridge Street



Square and local shops on Sun Street



Tesco Superstore on Sewardstone Road



Lidl Store on Cartersfield Road

07

In promoting the site at former Pickfield Nursery, we want to develop close links with the community and local representatives to best understand their needs, aspirations and concerns for the area. The whole project team is committed to ensuring the site design and planning process is done in cooperation with the local community, to ensure it is influenced by local knowledge and ambition.

We are at the most formative stage of the process and this brochure is designed to identify the opportunity of the site. We hope we can build close working partnerships to ensure that at every stage of the process the local community can influence the emerging plans. This is in line with the EFDC's Statement of Community Involvement, the Coalition Government's localism agenda, embodied in the Localism Act 2011, and the National Planning Policy Framework.

In addition to the planning and environmental benefits identified in this brochure, the re-development of the former Pickfield Nursery site will have a number of significant local economic impacts, as can be seen on the next page.

The Economic Benefits of Housing



at Pickfield Nursery, Waltham Abbey

The proposed development of approximately 90 homes on land at Pickfield Nursery in Waltham Abbey, Epping Forest offers the opportunity to stimulate economic growth and help reduce the impact on local authority budget cuts.

HEADLINE ECONOMIC IMPACTS

1. Housing Impacts

90 New Homes (approximately 40% affordable)



3. Expenditure Impacts



£1.9m

Estimated Additional Resident Expenditure within local shops and services [p.a.]



£450,000

First Occupation Expenditure on goods and services to make a house 'feel like home'



New Operational Jobs

supported by increased resident expenditure in the local area

4. LPA Revenue Impacts



[p.a.]

New Homes Bonus payments to Council [over a 6 year period]

Additional Council Tax Payments



S106 Payments

2. Construction Impacts STATE OF THE STATE



Direct Employment [estimated to create 90 temporary construction jobs over the 2 year length of the build]

Construction Value [estimated total cost of construction]

£10.1m

Indirect/Induced Employment [70 jobs could be supported in the supply chain per year of construction]

> **Economic Output** [expected additional GVA p.a. from direct and indirect jobs]

£1.5m GVA



- There is a significant district-wide housing shortfall against objectively
 assessed need (based on Government data) which EFDC are required to
 meet in accordance with the NPPF.
- In order to meet this significant housing need, EFDC acknowledge that Green Belt land release will be required at the District's main settlements that are unconstrained by environmental designations. This is considered a sustainable spatial strategy in accordance with the principles of effective plan making and the NPPF.
- EFDC's latest iteration of the Local Plan acknowledges that such an approach will likely lead to Waltham Abbey accommodating a proportion of the District's housing need (potentially approximately 25% or between 1,500 and 2,500 dwellings up to 2033).
- The latest Local Plan also identifies a number of growth options, one of which contains Pickfield Nursery (WAL-E). As part of the consultation on this Local Plan, EFDC's officers objected to a number of the growth options but not WAL-E. The recent Knolly's Nursery application (located in WAL-D) also acknowledges WAL-E as the most sustainable option for residential development.
- Pickfield Nursery is considered the most sustainable site at Waltham Abbey against EFDC's own sustainability scoring system as identified in their SHLAA.
- The site has been vacant since 1987. As a result, significant hardstanding, broken glass and unmaintained shrubland remain onsite. The site is an eyesore and offers no value to the local environment, nor does it serve the purposes or functions of the Green Belt in accordance with the NPPF.
- The high cost of remediating the site makes any form of future commercial horticultural use unviable.
- The former nursery represents a logical housing site between an area of established residential character and Cobbin's Brook to the north. Permanent existing boundaries mean that residential development of the site will not lead to sprawl into the wider, open Green Belt.
- Pickfield Nursery also adjoins Paternoster House Care Home which itself is a successful example of the regeneration of a derelict nursery site in the Green Belt.
- Pickfield Nursery has good links to existing transport networks and infrastructure, and has provisions for access in place.

- Its redevelopment will significantly enhance the existing environment, improve local access and pedestrian linkage to the countryside, and provide ecological enhancements to Cobbin's Brook.
- The proposals will create significant local socio-economic benefits.
- Given its previously developed status, collective problems, and 25 year dereliction, it is not anticipated that residential development at Pickfield Nursery would set a precedent for any other Green Belt development in the District, as the site's circumstances are entirely unique.



This document has outlined the key reasons why the former Pickfield Nursery site should be considered for a sustainable residential development.

that Pickfield Nursery should be allocated in EFDC's emerging Local Plan for approximately 90, much needed new homes.



Document prepared by Clague LLP.

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Appendix 2: Housing Needs Assessment

LOCAL HOUSING NEED ASSESSMENT

WALTHAM ABBEY, EPPING FOREST

Prepared on behalf of Crest Nicholson Eastern

January 2018



LOCAL HOUSING NEED ASSESSMENT

WALTHAM ABBEY, EPPING FOREST

PREPARED ON BEHALF OF CREST NICHOLSON

Project Ref: 28471/A5		
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APPENDIX 1: POPGROUP MODEL INPUTS: DATA ASSUMPTIONS

1.0 INTRODUCTION

1.1 This Study has been prepared by Barton Willmore on behalf of Crest Nicholson Eastern to support representations to the consultation on the Epping Forest District Local Plan (Submission Version 2017). The purpose of the study is to provide an up to date assessment of future population growth and associated housing need in the settlement of Waltham Abbey, located within Epping Forest District, based on robust assumptions of future demographic change.

i) Study area

1.2 For the purposes of our analysis, we have defined the settlement of Waltham Abbey as comprising four electoral wards; Waltham Abbey North East, Waltham Abbey South West, Waltham Abbey Honey Lane, and Waltham Abbey Paternoster. Figure 1.1 shows the extent of the Waltham Abbey Study Area we have assumed for our analysis.

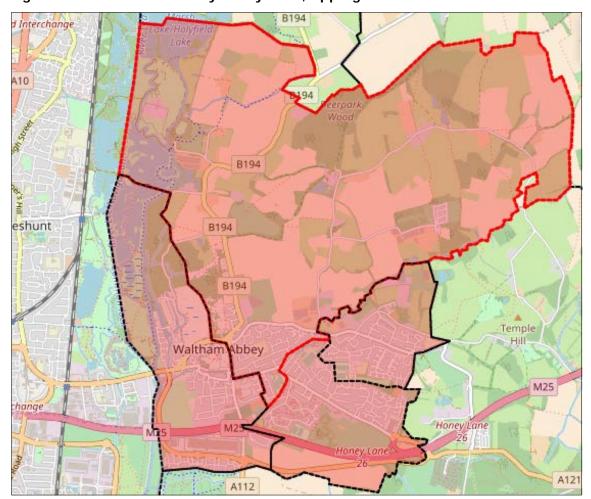


Figure 1.1: Waltham Abbey Study Area, Epping Forest

28471/A5/DU 1 January 2018

- 1.3 The Study we present here is structured as follows:
 - Section 2: National and Local Planning Policy, summarises the relevant national policy in relation to assessing housing need, and sets out the emerging local policy in the Epping Forest District Local Plan (Submission Version 2017) Epping Forest District and the settlement of Waltham Abbey;
 - Section 3: Population and Housing Growth Assessment presents the results of our bespoke demographic modelling for the Waltham Abbey study area set out in Figure 1.1 (above). This demonstrates how the population of Waltham Abbey is projected to change over the emerging Epping Forest Plan period (2011-2033). To do this we provide our own bespoke demographic modelling using the PopGroup demographic forecasting model based on up-to-date demographic trends published by the Office for National Statistics (ONS). Furthermore, we consider the demographic change that would result from the proposed level of housing for Waltham Abbey set out in the Submission Local Plan.
 - Section 4: Housing need Resulting from the Government's proposals in the 'Planning for the right homes' consultation presents housing need for Waltham Abbey using the proposed formula to distribute housing need to neighbourhood planning areas. This has been applied to the housing target for Epping Forest District set out in the Submission Plan, and the District-wide housing need resulting from the proposed standardised method for Epping Forest District;
 - Section 5: **Conclusion**, summarises the findings of our assessment of population growth and local housing needs for Waltham Abbey over the period 2011-2033.

2.0 NATIONAL AND LOCAL PLANNING POLICY

National Planning Policy

- i) National Planning Policy Framework (NPPF, 27 March 2012)
- 2.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. The presumption in favour of sustainable development is said to sit at the heart of the NPPF, and this requires that local planning authorities should positively seek opportunities to meet the development needs of their area, and that local plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.
- 2.2 In respect of housing requirements, the NPPF (paragraph 47) confirms the need for local authorities to significantly boost the supply of housing and in doing so confirms that local authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing.
- 2.3 Paragraph 50 of the NPPF requires local planning authorities to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. Paragraph 50 states how the NPPF's objective is to create mixed and balanced communities:

"To deliver a wide choice of high quality homes, widen opportunities for home ownership and create <u>sustainable</u>, inclusive and <u>mixed</u> <u>communities</u>, local planning authorities should:

- plan for a mix of housing based on <u>current and future demographic trends</u>, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and
- identify the size, type, tenure and range of housing that is required in particular locations, <u>reflecting local demand</u>." (our emphasis)
- 2.4 In respect of Plan-making paragraph 159 states:

"Local Planning authorities should have a <u>clear understanding of</u> <u>housing needs in their area</u>. They should:

Prepare a Strategic Housing Market Assessment to assess their housing needs, working with neighbouring authorities where housing market areas cross-administrative boundaries. The Strategic Housing

Market Assessment should <u>identify the scale and mix of housing and</u> the range of tenures that the local population is likely to need over the plan period which:

Meets household and population projections, taking account of migration and demographic change;

Addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and

Caters for housing demand and the scale of housing supply necessary to meet this demand" (our emphasis)

- 2.5 This study responds to the NPPF requirements by identifying population change in Waltham Abbey across all age groups.
 - ii) Planning Practice Guidance (PPG 06 March 2014)
- 2.6 The PPG supports the policies of the NPPF and provides detailed guidance on how to implement the policies in practice. Included within this is a section (PPG ID2a) relating to the Housing and Economic Development Needs Assessments (HEDNA).
- 2.7 The primary objective of the HEDNA is to identify the future quantity of housing needed, including a breakdown by type, tenure and need (PPG ID2a 002).
- 2.8 The HEDNA presents a methodology for assessing overall housing need and goes on to state:

"Once an overall housing figure has been identified, plan makers will need to break this down by tenure, household type (singles, couples and families) and household size. Plan makers should therefore examine current and future trends of:

- the proportion of the population of different age profile;
- the types of household (eg singles, couples, families by age group, numbers of children and dependents);
- the current housing stock size of dwellings (eg one, two+ bedrooms);
- the tenure composition of housing.

This information should be drawn together to understand how age profile and household mix relate to each other, and how this may change in the future. When considering future need for different types of housing, plan makers will need to consider whether they plan to attract a different age profile eg increasing the number of working age people." (Our emphasis)

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¹ Paragraph: 021 Reference ID: 2a-021-20150326, How should the needs for all types of housing be addressed? Planning Practice Guidance, 06 March 2014 (revised 26 March 2015)

- 2.9 This study is set in the context of the PPG for assessing change in age profile and household change in the study area.
 - iii) Housing White Paper 'Fixing our broken housing market' (February 2017)
- 2.10 The Housing White Paper was published in February 2017, and acknowledges a need for 225-275,000 new homes per annum to keep up with population growth and start to tackle years of under-supply in the country. However, in the November 2017 Autumn Budget the Chancellor Philip Hammond announced plans to build 300,000 homes per year in the country stating:

"I'm clear that we need to get to 300,000 units a year if we are going to start to tackle the affordability problem, with the additions coming in areas of high demand."

- 2.11 The Housing White Paper acknowledges that one of the main problems leading to significant under-supply of housing has been the failure of local authorities to plan for the homes they need.³
- 2.12 To solve the country's housing shortage the White Paper states a 'radical re-think of our whole approach to home building' is required. This includes the existing approach to establishing the Objectively Assessed Housing Need (OAHN) on which the Housing White Paper states:

"at the moment, some local authorities can duck potentially difficult decisions, because they are free to come up with their own methodology for calculating 'objectively assessed need'. So, we are going to consult on a new standard methodology for calculating 'objectively assessed need', and encourage councils to plan on this basis." ⁵

- 2.13 The Government consulted on a proposed standard methodology between September and November 2017 within the 'Planning for the right homes in the right places' consultation (see below) which carries forward the commitment of the Housing White Paper to tackle the acute shortage of housing supply in the country.
- 2.14 The Housing White Paper seeks to support small and medium sized sites, and thriving rural communities stating:

"There are opportunities to go further to support a good mix of sites and meet rural housing needs, especially where scope exists to

 $^{^2}$ Paragraph 2, 'Our housing market is broken', page 9, 'Fixing our broken housing market', February 2017

³ Paragraph 4, 'Our housing market is broken', page 9, 'Fixing our broken housing market', February 2017

⁴ Paragraph 5, 'Our housing market is broken', page 14, 'Fixing our broken housing market', February 2017

⁵ Paragraph 7, 'What we're going to do about it', page 14, 'Fixing our broken housing market', February 2017

expand settlements in a way which is sustainable and helps provide homes for local people. This is especially important in those rural areas where a high demand for homes makes the cost of housing a particular challenge for local people. With these objectives in mind we are proposing a number of additional changes to the National Planning Policy Framework to:

- highlight the opportunities that neighbourhood plans present for identifying and allocating small sites that are suitable for housing, drawing on the knowledge of local communities;
- encourage local planning authorities to identify opportunities for villages to thrive, especially where this would support services and help meet the need to provide homes for local people who currently find it hard to live where they grew up; and
- give much stronger support for 'rural exception' sites that
 provide affordable homes for local people by making clear
 that these should be considered positively where they can
 contribute to meeting identified local housing needs, even if
 this relies on an element of general market housing to ensure
 that homes are genuinely affordable for local people."6
- 2.15 The Housing White Paper proposes to amend national planning policy so that neighbourhood planning groups can obtain a housing requirement figure from their local planning authority⁷ reinforcing the central role of local and neighbourhood plans in the planning system so that local planning authorities and local communities retain control of where development should and should not go.
 - iv) Planning for the right homes in the right places consultation proposals (September 2017)
- 2.16 The 'Planning for the right homes in the right places' consultation sought to consult on specific issues highlighted by the Housing White Paper (February 2017).
- 2.17 As part of this consultation the Government have published a proposed standard approach to establishing local housing need (currently the OAHN). This is intended to replace the existing methodology set out in section ID2a of the PPG entitled 'Housing and Economic Development Needs Assessments' (HEDNA) which the consultation suggests "leaves substantial room for interpretation" as it is currently drafted. In short, the Government intend the proposed methodology to provide a "simpler, quicker, and transparent" approach to assessing local housing need. Section 4 of this report sets out the implications of the standard method on housing need in Epping Forest District.

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⁶ Paragraph 1.29, 'Our housing market is broken', page 25, 'Fixing our broken housing market', February 2017

⁷ Paragraph 1.43, 'Our housing market is broken', page 29, 'Fixing our broken housing market', February 2017

2.18 The Consultation report also outlines how the new approach to calculating housing need can help authorities plan for the needs of particular groups and support neighbourhood planning. In respect of neighbourhood planning, the report states:

"where the local plan is out-of-date and cannot be relied on as a basis for allocating housing figures, we are proposing to set out in guidance a simple formula-based approach which apportions the overall housing need figure for the relevant local authority area/s, based on the latest figures calculated under the new standard approach (once, and assuming, it is introduced), to the neighbourhood planning area. The proposed formula is simply to take the population of the neighbourhood planning area and calculate what percentage it is of the overall population in the local planning authority area. The housing need figure in the neighbourhood planning area would then be that percentage of the local planning authority's housing need."8

2.19 Epping Forest District Council are currently consulting on the Submission Version of their Local Plan and we consider how the proposed approach of Government (above) would affect Waltham Abbey, later in this study.

Local Planning Policy

iv) Epping Forest District Local Plan (Submission Version 2017)

- 2.20 The Submission Version of the emerging Epping Forest District Local Plan was published for consultation on 18 December 2017. Policy SP2, 'Spatial Development Strategy' of the Submission Plan sets out the Plan's approach to deliver a "minimum of 11,400 new homes" within the 2011-2033 period. Policy SP2 goes on to allocate this figure by settlement, with 858 new homes allocated for Waltham Abbey between 2011 and 2033. 9 The Plan also states how 10,000 new jobs will be created across the District over the same Plan period. 10
- 2.21 Waltham Abbey is classified as a 'small District centre' within the District's settlement hierarchy set out in Policy E2. This type of centre is the second classification in the Council's hierarchy. For Waltham Abbey, the Submission Plan has a very clear 'Vision' for Waltham Abbey, as follows:

"Waltham Abbey will be a revitalised Small District Centre, with a thriving daytime and night-time economy. A mix of new housing will play a strong role in the town's regeneration, providing the population to support a healthy town centre economy, whilst also enabling the required community and social infrastructure, supporting a fully sustainable community." 11

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⁸ DCLG, 'Planning for the right homes in the places: consultation proposals', September 2017 paragraph 99, page 32

⁹ Policy SP2, page 31, Epping Forest District Local Plan (Submission Version 2017)

¹⁰ 'Key Issues for the Plan to Address', page 09, Epping Forest District Local Plan (Submission Version 2017)

^{11 &#}x27;Vision for Waltham Abbey', Epping Forest District Local Plan (Submission Version 2017)

2.22 In respect of the demographic make-up of the town, the 'Vision' moves on to state the following:

"The Town will support a diverse population of young people, families and the elderly, reducing inequality through provision of high quality new residential development in the most sustainable locations." 12

2.23 The Submission Plan is very clear that Waltham Abbey is intended to contribute to economic growth across the District, and must ensure a mixed and balanced demographic structure.

v) Designated Neighbourhood Areas

2.24 The Waltham Abbey Neighbourhood Plan area was approved by Epping Forest District Council on 08 March 2016. Waltham Abbey Town Council is currently preparing a draft Neighbourhood Plan although no details are publicly available at the current time.

vi) Summary

- 2.25 In summary, the NPPF and PPG identify how housing should be significantly boosted, and that every effort should be made to establish inclusive, sustainable, mixed and balanced communities.
- At the local level, the Submission Version of the Epping District Local Plan identifies Waltham Abbey as a 'small district centre' and states how the 'Vision' for Waltham Abbey is to revitalise it and ensure it has a thriving daytime and night-time economy. To support this 'Vision' the Plan aims to deliver 858 dwellings between 2011 and 2033.
- 2.27 This Study tests whether 858 additional dwellings would be sufficient to meet the future housing needs of Waltham Abbey's population and whether the 'Vision' for Waltham Abbey is likely to be achieved.

¹² 'Vision for Waltham Abbey', Epping Forest District Local Plan (Submission Version 2017)

3.0 POPULATION AND HOUSING GROWTH ASSESSMENT

- 3.1 This section of the report provides a sub-district assessment of population change and resulting housing requirements for Waltham Abbey, using the most up-to-date demographic assumptions from the Office for National Statistics (ONS) and Ministry of Housing, Communities and Local Government (MHCLG).
- Our assessment of future population growth and housing need has been undertaken using the POPGROUP and Derived Forecasts (DF) demographic forecasting model. The POPGROUP and DF model is a well-established demographic model developed to forecast population, households and the labour force for specified geographical areas. POPGROUP has over 90 users, including academic and public service staff in housing, planning, health, policy, research, economic development and social services. It is the industry standard in the UK for demographic analysis within strategic planning and is therefore considered to provide a robust indication of population change and resulting housing need.
- 3.3 The method applied in this Study is set within the context of the NPPF requirement to use official projections of migration and demographic change (NPPF, paragraph 159), supported by section ID2a 'Housing and Economic Development Need Assessments' of the Planning Practice Guidance (PPG).

i) Scenarios and Assumptions

- This study considers population growth in Waltham Abbey over the adopted Epping Forest District Local Plan period 2011-2033 according to the **2014-based Sub National Population Projections** (SNPP) published by the ONS. The SNPP are published for all local authority district areas in England and provide a projection of population growth over the period 2014-2039. However, it is important to emphasise that the Government's Planning Practice Guidance (PPG) advises that the official ONS projections form the 'starting point estimate' of overall housing need. This study therefore provides this starting point, but does not consider any further adjustment which may be necessary, i.e. to support job growth or address worsening market signals.
- 3.5 The ONS SNPP are trend-based projections. That is, they project forward past demographic trends (from the 5-year period 2009-2014) in births, deaths and migration. They do not take account of any future changes to government policy which may affect these past trends.
- 3.6 We have produced a 2014-based SNPP scenario for Waltham Abbey that is consistent with the official projection for Epping Forest District. In doing so, we have assumed the annual ONS

Mid-Year Population Estimates (MYPE) by single year of age and gender for Waltham Abbey over the period 2011-2014 and projected forward the 2014 MYPE for Waltham Abbey using the **fertility, mortality and migration** assumptions from the 2014-based SNPP for Epping Forest District.

- 3.7 To establish the growth in households that will result from the 2014-based SNPP, the MHCLG apply **household formation rates** (HFRs) to the population projection. A HFR is the likelihood that a person of a given age and gender will become the notional head of household. The result is the official MCCLG 2014-based household projections that are used to inform the 'starting point' of housing need according to the PPG HEDNA.
- 3.8 The assessment of housing need within this Study has followed the same approach and applied the most recent 2014-based HFRs by age and gender to the 2014-based SNPP projected population profile of Waltham Abbey.
- 3.9 However, the 2014-based HFRs are underpinned by trends from the period of 2009-2014, during which time household formation was constrained in the 25-44 age group by a rapid worsening of affordability. This resulted in a significant increase in 'concealed households' across the country due to young people being unable to form their own independent households. A concealed household is defined as follows:

"Family units or single adults living within other households, who may be regarded as potential separate households which may wish to form given appropriate opportunity." 13

- 3.10 The 2014-based HFRs therefore project these suppressed trends forward between 2014 and 2039. To plan based on the 2014-based HFRs unadjusted is not considered to represent positive planning in alignment with the policies of the NPPF to 'significantly boost' housing supply.
- 3.11 In this context, Barton Willmore apply two different approaches to the HFRs, as follows:
 - **HFR Baseline**: 2014-based HFRs as published;
 - **HFR Sensitivity**: Assuming a gradual 50% return in the 25-34 and 35-44 age groups from the suppressed 2014-based HFRs to the more positive 2008-based HFRs by the end of the plan period, only where the 2014 HFRs are projected to be lower than the 2008 HFRs. All other age groups remain as per the published 2014-based HFRs. This is the approach that was recommended to Government by the Local Plans Expert Group in March 2016.

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¹³ Paragraph 3.4, page 42, Estimating housing need, CLG, November 2010

- 3.12 Projections of households are converted into projections of housing need (dwellings) by applying an allowance for vacancy/second homes. The rate for Epping Forest District is 3.3% according to MHCLG 2017 Council Tax data. The same rate has been assumed for Waltham Abbey.
- 3.13 Appendix 1 outlines full details of the data assumptions and sources used within our analysis.

ii) Waltham Abbey Demographic-Led Housing Need

3.14 Table 3.1 summarises the population of Waltham Abbey in 2011 and the projected population in 2033 according to the 2014-based SNPP scenario. Figures are provided for broad age groups and in total.

Table 3.1: 2014-based SNPP – Population growth 2011-2033 – Waltham Abbey

Age Group	2011	2033	Population Change 2011-2033	% Change 2011-2033
0-15	3,624	4,593	969	26.7%
16-64	12,219	14,089	1,870	15.3%
65+	3,109	5,155	2,046	65.8%
Total	18,952	23,837	4,885	25.8%

Source: ONS/ Barton Willmore

- 3.15 Table 3.1 shows how the 2014-based ONS SNPP would result in Waltham Abbey's population increasing by 25.8% over the period 2011-2033, which is equivalent to an additional 4,885 people. Importantly, the 2014-based SNPP would result in a balance of growth in the child age, working age, and the elderly populations. The largest proportional increase is in the 65+ age group, however this is offset to some extent by the growth in child age and working age population.
- 3.16 Table 3.2 (below) presents dwelling growth associated with the projected population as a result of applying HFRs and a vacancy rate of 3.3%. We have provided two approaches to household formation rates as explained in paragraph 3.7 above. The results are as follows:

Table 3.2: Housing need arising from the 2014-based SNPP (2011-2033)

Area	HFR approach	2011	2033	2011-2033
Maltham Abbay	HFR Baseline	7,952	10,324	2,373
Waltham Abbey	HFR Sensitivity	7,952	10,459	2,508

Source: Barton Willmore

3.17 Table 3.1 demonstrates that the 2014-based ONS SNPP scenario projects population growth of 4,885 additional people in Waltham Abbey over the period 2011-2033. Table 3.2 demonstrates

that an additional **2,373 dwellings** will be required to house this population growth upon application of the 2014-based HFRs (HFR Baseline). However, the results of the HFR sensitivity analysis suggest that housing need would increase to **2,508 dwellings** if suppressed household formation of younger people (aged 25-44 years) is addressed.

- 3.18 Demographic need for Waltham Abbey according to the 2014-based SNPP is therefore considered to be between 2,373 and 2,508 dwellings, 2011-2033. This represents a significant increase from the 858 homes planned for in the Submission Plan.
- 3.19 As discussed in the local policy section (section 2) of this report, the Submission Version of the Epping Forest Plan proposes a total of 11,400 new dwellings, 2011-2033. This is <u>lower</u> than the MHCLG 2014-based household projection for Epping Forest District of approximately 14,850 dwellings. However, even if the Draft Plan figure of 11,400 dwellings were to be apportioned to Waltham Abbey based on the proportion of the District population resident in Waltham Abbey (14.9%), an additional **1,700 dwellings** would be required between 2011 and 2033; **double** the number of homes proposed in the Draft Plan.
- 3.20 In this context it is therefore considered appropriate to assess the demographic change that would result from the delivery of only 858 new dwellings, 2011-2033. We do this below.

iii) Waltham Abbey Demographic Change - 858 Dwellings, 2011-2033

- 3.21 As discussed above, our demographic modelling has shown there to be a significantly higher level of demographic-led housing need in Waltham Abbey than is planned in the Submission Version of the Draft Local Plan. It is therefore considered appropriate to determine what the implications would be of delivering the Plan's proposed target for Waltham Abbey (858 dwellings, 2011-2033), in the context of the aims and objectives set out in the Submission Plan.
- 3.22 Barton Willmore have therefore used the PopGroup model to run a 'dwelling-led' scenario, whereby the demographic change of Waltham Abbey is constrained to delivery of 858 dwellings, 2011-2033, at an annual average delivery rate of 39 dwellings. Table 3.3 summarises the population change that will result from the provision of 858 new dwellings, 2011-2033.

4.3%

Total

Population Change % Change 2011 2011-2033 2011-2033 Age Group 2033 0-15 3,624 3,506 -118 -3.3% 16-64 12,219 11,583 -636 -5.2% 65 + 3,109 4,687 1,578 50.8%

Table 3.3: Waltham Abbey Demographic Change (858 dwellings, 2011-2033)

18,952 Source: Barton Willmore Demographic Modelling

19,776

Table 3.3 shows how the delivery of 858 new dwellings over the 2011-2033 will fail to support 3.23 the Submission Plan's aspirations for Waltham Abbey, for several reasons.

824

Table 3.3 shows that delivery of 858 new dwellings, 2011-2033, will result in a decline of both 3.24 the child age population (0-15) and the broad working age population (16-64). In the first instance, this character of demographic change would not assist in delivering the Economic Development Local Plan Objectives set out in the Submission Plan. Local Plan Objective C. (ii) states the following:

> "to diversify the District's two Town Centres (Epping and Loughton High Road) and four Small District Centres (Loughton Broadway, Ongar, Waltham Abbey and Buckhurst Hill) to support their future vitality and viability by encouraging other forms of town centre uses including residential, cultural, leisure, tourist and commercial activities appropriate to their roles." 14 (Our emphasis)

- A decline in the working age population of Waltham Abbey would not serve to support this 3.25 objective, as it would lead to an obvious loss of vitality in the settlement through an unbalancing of the population structure towards the elderly. In respect of the economy, paragraph 3.39 of the Submission Plan refers to "key employment locations include Loughton and Waltham Abbey".
- 3.26 Furthermore, as we have summarised in the previous section of this report, the Council set out clear aspirations for the development of Waltham Abbey in their 'Vision for Waltham Abbey'. As part of this 'Vision', the Plan is very specific regarding the structure of population it intends to create in Waltham Abbey, as follows:

"Waltham Abbey will be a revitalised Small District Centre, with a thriving daytime and night-time economy. A mix of new housing will play a strong role in the town's regeneration, providing the population to support a healthy town centre economy, whilst also enabling the required community and social infrastructure, supporting a fully sustainable community." 15

¹⁴Local Plan Objectives, page 20, Epping Forest District Local Plan (Submission Version 2017)

¹⁵ Vision for Waltham Abbey, page 127, Epping Forest District Local Plan (Submission Version 2017)

"The Town will support a <u>diverse population of young people, families</u> and the elderly, reducing inequality through provision of high quality new residential development in the most sustainable locations. Waltham Abbey will create local business and employment opportunities that <u>underpin the local economy</u>, particularly in the leisure industry." ¹⁶ (Our emphasis)

- 3.27 It is abundantly clear that a more balanced population than that set out in Table 3.3 will need to be created to support the Submission Plan's 'Vision' for Waltham Abbey.
- 3.28 In contrast to the demographic change created by 858 new dwellings 2011-2033, the population growth created by the 2014-based ONS SNPP (see Table 3.1 above) will be characterised by a healthy increase in the working age and child age population. This will serve to meet the Submission Plan's 'Vision' for Waltham Abbey, generating the 'diverse population of young people, families, and the elderly' set out in the 'Vision'. The increase in the working age population will also be made up of young adults and families, enabling the aspiration of creating a 'thriving daytime and night-time economy' to be supported.
- 3.29 However, although the 2014-based SNPP scenario we have presented results in a significant increase to the number of dwellings proposed for Waltham Abbey, it is imperative to understand that 2014-based ONS SNPP represents the 'starting point' estimate of housing need only according to the PPG HEDNA; further upward adjustments could be required to meet job growth and market signals.

iv) Summary

- 3.30 In summary, the key points to note in respect of our analysis are as follows:
 - The planned housing development in Waltham Abbey must be of a quantum that will generate a population structure adequate to support and meet the 'Vision for Waltham Abbey' set out in the Submission Version of the Epping District Local Plan;
 - In this context our analysis has shown that the allocation of 858 new dwellings (2011-2033) to Waltham Abbey in the Submission Version of the Epping District Local Plan will wholly fail in meeting this 'Vision', resulting in a <u>decline</u> in both child age and working age population;
 - In contrast the 'starting point' demographic-led housing need we have determined, based on the latest official 2014-based ONS projections as required by Government's PPG, will

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¹⁶ Vision for Waltham Abbey, page 127, Epping Forest District Local Plan (Submission Version 2017)

- support an <u>increase</u> in child age and working age population. It will therefore assist in meeting the Submission Plan's 'Vision' for Waltham Abbey;
- The demographic-led housing need we have determined for Waltham Abbey is between 2,373 and 2,508 dwellings, 2011-2033. This should be considered a minimum, as it is based on demographic trends only. It is possible that an increase would be required to meet a specific level of job growth and address worsening market signals.
- 3.31 The next section of this report considers what housing need for Waltham Abbey might be if the Government's proposed standardised methodology is adopted and the proposed changes to the NPPF in respect of Neighbourhood planning are put in place.

4.0 HOUSING NEED RESULTING FROM THE GOVERNMENT'S PROPOSALS IN THE 'PLANNING FOR THE RIGHT HOMES' CONSULTATION

- 4.1 This section of the Study considers the implications for housing need in Epping Forest District, and Waltham Abbey should the Government's proposals set out in the 'Planning for the right homes in the right places' consultation (September 2017) become adopted.
- 4.2 As explained in Section 2 of this report, the Government consultation set out a proposal for a standardised methodology for assessing housing need, with the intent to replace the existing PPG HEDNA. This section begins by presenting what housing need for Epping Forest District would be according to the proposed standard method before going on to present the resulting housing need for Waltham Abbey following the Government's proposed changes to the NPPF in respect of Neighbourhood Planning.

i) Proposed Standardised Housing Need Figure for Epping Forest District

- 4.3 The consultation proposals, if formally adopted without amendments, would result in a threestage approach to determining Objectively Assessed Housing Need (OAHN) as follows:
 - 1. <u>'Setting the baseline'</u> (paragraphs 16-17): Average of the most recent official MHCLG household projections over 10 years (currently 2016-2026). For Epping Forest District this equates to 659 households per annum;
 - 2. 'An adjustment to take account of market signals' (paragraphs 18-24): Based on the median affordability ratio for the most recent year available (2016). For Epping Forest, the median affordability ratio in 2016 was 14.09. The equation for determining the uplift in market signals is set out in paragraph 21 of the consultation proposals, and results in an uplift of 416 homes per annum in Epping Forest. This uplift represents a 63% increase from Step 1, and is to be added to the baseline need at step 1, i.e. 659 + 416 = 1,075 homes per annum in Epping Forest District.
 - 3. 'Capping the level of any increase' (paragraph 25): The consultation proposals state how a cap will be applied to the housing need figure, based on the status of the Local Plan. In the case of local authorities where there is no adopted Plan within the last 5 years (as is the case in Epping Forest), the Government's proposals state the new housing need figure should be capped at 40% above the annual requirement figure currently set out in the most recent Local Plan or 40% above the CLG household projection (Step1), whichever is the higher. Epping Forest has no adopted Plan, and so the figure will be capped at 40% above the latest MHCLG projection (659 homes per annum), resulting in a local housing need figure of 923 homes per annum.

4.4 Under the standard methodology, housing need for Epping Forest District is 923 homes per annum, which if applied over a 22-year plan period would result in a need for 20,297 dwellings in total.

ii) Housing need for Neighbourhood Planning Areas

- 4.5 The 'Planning for the right homes in the places' consultation proposes a number of changes in relation to Neighbourhood Planning. One of the proposals would place a requirement on local planning authorities to provide neighbourhood planning groups with a housing need figure.
- 4.6 Where there is an adopted local plan the proposals state the following:

"We propose to make clear in planning guidance that authorities may do this [provide neighbourhood planning groups with a housing need figure] by making a reasoned judgement based on the settlement strategy and housing allocations in their plan, so long as the local plan provides a sufficiently up-to-date basis to do so." (paragraph 96)

4.7 However, where the local plan is out-of-date and cannot be relied on as a basis for allocating housing figures:

"We are proposing to set out in guidance a simple formula-based approach which apportions the overall housing need figure for the relevant local authority area/s, based on the latest figures calculated under the new standard approach (once, and assuming, it is introduced), to the neighbourhood planning area. The proposed formula is simply to take the population of the neighbourhood planning area and calculate what percentage it is of the overall population in the local planning authority. The housing need figure in the neighbourhood planning area would then be that percentage of the local planning authority's housing need." (paragraph 99)

4.8 Our analysis earlier in this report has identified that the population of our Waltham Abbey study area represents 14.9% of Epping Forest District's total population. In line with the proposed formula, we have applied this percentage to both the Submission Local Plan housing target (11,400 dwellings) and need according to the standard methodology (20,297 dwellings) for Epping Forest District. Table 4.1 presents the resulting housing need for Waltham Abbey.

Table 4.1: Housing Need for Waltham Abbey using Government's proposed formula approach (total dwellings, 22-year period)

	Epping Forest District	Waltham Abbey
Submission Plan	11,400	1,698
Standard Method	20,297	3,024

Source: Barton Willmore

- 4.9 Following the Government's proposed methodology for allocating housing need to Neighbourhood Planning areas, our analysis identifies a need for <u>at least</u> 1,698 dwellings in Waltham Abbey to support the Submission Plan target for the District, increasing to 3,024 dwellings to support housing need for Epping Forest District according to the standard methodology. These figures represent a 22-year requirement.
- 4.10 Need of 1,698 dwellings or 3,024 dwellings is significantly higher than the 858 dwellings currently proposed in the Submission Plan (between a 98% and 252% increase).
- 4.11 As we have identified in the previous section of this report, demographic-led housing need ranges from 2,373 to 2,508 dwellings, 2011-2033.
- 4.12 All figures are significantly more than the 858 dwellings proposed in the Submission Plan.

iii) Summary

- 4.13 As we have identified above, if the Government's proposed standardised methodology for establish local housing need is formally adopted, Epping Forest would need to deliver a minimum of 20,297 dwellings, 2011-2033. Based on the proposals for distributing this to settlements, this would require 3,024 dwellings in Waltham Abbey over the same period.
- 4.14 An additional 3,024 dwellings in Waltham Abbey would represent a 250% increase from the 858 dwellings currently proposed in the Submission Plan.

5.0 SUMMARY AND CONCLUSIONS

i) Introduction

- 5.1 This report has analysed local housing need in the settlement of Waltham Abbey, located within Epping Forest District. The analysis has been made in accordance with the NPPF objective of significantly boosting housing supply and ensuring that local demand is met, ensuring that sustainable, inclusive, and mixed communities are established.
- The Submission Version of the Epping Forest District Local Plan sets a requirement for 11,400 additional dwellings in the District over the period 2011-2033, allocating 858 dwellings to Waltham Abbey which is defined as a 'Small District Centre' within the Plan's settlement hierarchy.
- In the context of this allocation, this Study has determined what the minimum demographic-led housing need would be for Waltham Abbey, based on the latest official 2014-based ONS Sub National Population Projections. Furthermore, in the context of the Submission Plan's 'Vision' for Waltham Abbey, we have tested whether the Plan's proposals for an additional 858 dwellings (2011-2033) will be sufficient to meet the Plan's objectives and aspirations for the town.

ii) Conclusions

- Our bespoke demographic modelling and accompanying analysis has concluded that demographic-led housing need in Waltham Abbey is **between 2,373 and 2,508 dwellings**, 2011-2033. This range is dependent on whether an upward adjustment is applied to address household formation suppression in the 25-44 age group in Epping Forest District. Notwithstanding the issue of household formation suppression, this range is significantly higher than the 858 dwellings proposed in the Submission Plan.
- 5.5 The Submission Plan has a clear 'Vision' for Waltham Abbey, outlining how Waltham Abbey will be characterised by a thriving daytime and night-time economy; a population to support a healthy town centre economy; and a diverse population of young people, families, and the elderly.
- 5.6 However, in the context of this Vision, our bespoke demographic modelling has shown how the Submission Plan proposals for 858 dwellings, 2011-2033 will fail to support the Plan's 'Vision' for Waltham Abbey. Provision of only 858 dwellings over the Plan period will result in a decline of both the child age and working age population. In contrast there will be a significant increase in the elderly.

- 5.7 In contrast, the analysis shows how demographic-led housing need will provide a healthy increase in child age and working age population. It may be that the increase in the working age population will need to be increased further to meet the employment aspirations for Waltham Abbey set out in the Plan. In this context, growth of between 2,373 and 2,508 new dwellings, 2011-2033, should be considered a minimum.
- 5.8 Furthermore, this report has also identified that housing need for Epping Forest would increase to 923 dwellings per annum (total of 20,297 over a 22-year period) under the Government's proposed standardised method for assessing housing need. This provides a 40% uplift to the MHCLG 2014-based household projection and a 78% uplift to the Submission Plan's target.
- 5.9 Waltham Abbey currently represents 14.9% of the District's population. Applying a straightforward pro-rata approach to allocating need to Neighbourhood areas as proposed in the Government's 'Planning for the right homes in the right places' consultation, would require 3,024 of the 20,297 dwellings to be provided in Waltham Abbey over a 22-year period. Even applying the pro-rata approach to the lower Submission Version Local Plan target of 11,400 dwellings would require a need for 1,698 dwellings in Waltham nearly double the proposed allocation in the Submission Plan (858 dwellings).

iii) Summary and Way Forward

- 5.10 In summary, the bespoke demographic modelling and analysis set out in this Study provides robust evidence to show that delivery of only 858 new dwellings in Waltham Abbey, 2011-2033, will fail to meet the aspirations for the town of the Submission Plan.
- 5.11 The Study has also shown how the minimum level of need for Waltham Abbey, based on demographic-led assumptions, is <u>between 2,373 and 2,508 dwellings, 2011-2033</u>.
- 5.12 In addition, if Government proposals for a standardised housing need methodology are adopted, need in Waltham Abbey will increase to 3,024 dwellings, 2011-2033.

APPENDIX 1:

POPGROUP MODEL INPUTS: DATA ASSUMPTIONS

Data Assumptions Used to forecast Waltham Abbey's Population

Variable	Data set	Source
Base population	2011 Mid-Year Population Estimates	ONS
base population	by single year of age and gender	ONS
	specifically for Waltham Abbey.	
	Forecast also constrained to the	
Contility nation	annual MYPE up to 2014	ONS 2014-based Sub-
Fertility rates	Age specific fertility rates for Epping	
	Forest (applied to Waltham Abbey)	National Population
	that include a differential to reflect	Projections
	the national-local variations in age	
	specific fertility rates	
Mortality rates	Age standardised mortality ratios for	ONS 2014-based Sub-
	Epping Forest (applied to Waltham	National Population
	Abbey) that include a differential to	Projections
	reflect the national-local variation in	
	age standardised mortality rates	
Migrant profile	Age and gender specific migration	ONS 2014-based Sub-
(Internal migrants)	rates for Epping Forest broken down	National Population
	by in-migrants from elsewhere within	Projections
	the UK and out-migrants to the	
	elsewhere in the UK	
Migrant profile	Age and gender specific migration	ONS 2014-based Sub-
(International	counts for Waltham Abbey broken	National Population
migrants)	down by in-migrants from overseas	Projections
	and out-migrants to overseas.	
	Counts for Waltham Abbey based on	
	14.9% of Epping Forest total on the	
	basis of Waltham Abbey representing	
	14.9% of Epping Forest's population	
	in 2016	
Communal	Age and gender counts of people	2011 Census, Table
establishment	living in communal establishments	LC1105EW, ONS
population	rather than private households. For	
	ages 75+ proportions rather than	
	counts are used to reflect the ageing	
	population. Data relates specifically	
<u>I</u>	<u> </u>	<u> </u>

	to Waltham Abbey	
Household formation	Household formation rates by age and	DCLG 2014-based
rates (HFRs)	gender for Epping Forest with	household projections
	sensitivity scenario providing a 50%	
	return to 2008-based HFRs for 25-44	
	year olds by end of the plan period	
Vacancy rate	Dwelling vacancy rate for Epping	2017 Council Tax Base
	Forest (3.3%)	(DCLG) and DCLG Live
		Tables 125/615 (2016)

Appendix 3: Local Plan Map 5.6 Suggested Amendments

