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**EPPING FOREST LOCAL PLAN EXAMINATION**

**Matter 4: Spatial Strategy and Distribution of Development**

**Hearing Statement on behalf of Bullwood Ltd (Ref 19LAD0068)**

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**Issue 1: Does the distribution of development place too much reliance upon the Garden Community Sites around Harlow at the expense of testing the capacity of the other settlements in the District?**

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**How was the amount of housing proposed in the three Garden Town sites allocated in Policy SP5 determined (3,900 dwellings in total)?**

- 1.1 It appears that this was determined by the Cooperation for Sustainable Development Member Board on 18<sup>th</sup> July 2016 (EB1312) based on the Harlow Strategic Site Assessment report (EB1500) and accompanying SA (EB203). These reports considered the suitability of sites in/around Harlow, transport modelling work which indicating potential capacity to accommodate between 14,000 – 17,000 homes across Harlow, and issues around the pace of delivery/ market absorption. The SA considered alternative options for the spatial distribution of development.
- 1.2 This SA (EB203) did not draw definitive conclusions, noting that in many respects the overall sustainability performance of many of the options considered are “*broadly similar*,” and outlining that the sustainability performance of the six options “*will largely depend on the more detailed elements related to the delivery of growth ... including relating to the specific location of new development, design and layout .. and the integration of elements such as enhancement to sustainable transport networks and green infrastructure.*”
- 1.3 The identified growth locations identified around Harlow have a very weak spatial relationship with one another, are remote from the Harlow Town Centre and Rail Station and will fail to deliver the sustainability benefits which could be achieved from alternative locations, such as Loughton, the District’s largest town. They are not consistent to the Plan’s vision to deliver growth at the most sustainable locations in the District.

**Could a higher level have been accommodated and would this have reduced the impact of growth proposed elsewhere in the district?**

- 1.4 No. 16,100 homes in and around Harlow would require housing in the Harlow area to grow by around 2.1% per annum over the period from 2017-33, which is a level which exceeds that achieved by any local authority nationally over the last five years, and is at the top end of what is achievable. Given that Harlow is a relatively low value housing market - with a median house price of £279,000 compared to £307,000 across Essex and £442,500 in Epping Forest<sup>1</sup> - and the weak connections between the growth locations in Epping Forest and Harlow Station, we do not consider that this level of housing growth is achievable.

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<sup>1</sup> ONS Median House Price for Administrative Geographies, Year to June 2018

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- 1.5 Major infrastructure is required, including a new M11 Junction (7A), Stort river crossing improvements, and there are potential waste water treatment constraints. There is a lack of evidence to demonstrate that the necessary joint work has been undertaken to consider the influenced which this could have on the phasing and delivery of growth at Harlow, sufficient to demonstrate that 16,100 homes can be delivered over the period to 2033.
- 1.6 The Harlow Strategic Site Assessment Study (EB1500) concluded that 16,100 homes could be concluded at Harlow only with caveats, that to clearly demonstrate this would require further detailed traffic modelling to demonstrate growth is deliverable on the scale envisaged, together with more detailed work to consider highways, sustainable travel, education, and sewage/drainage infrastructure provision. The current evidence base does therefore demonstrate that this scale of growth is capable of being delivered within the timeframe to 2033.

**Conversely, will the level of growth proposed elsewhere in the district be sufficient to support the vitality and viability of individual settlements over the Plan period?**

- 1.7 No. We have undertaken an analysis to consider what level of growth in dwellings is anticipated over the 2017-33 period, taking account of commitments<sup>2</sup> and the proposed allocations. We have then benchmarked this compared to the 2011 dwelling stock in each settlement, based on Census data and the Council's Settlement Hierarchy Paper (EB1007). This shows that:
- For certain settlements, very modest levels of growth are shown – with Theydon Bois and Buckhurst Hill seeing < 5% growth in dwellings over a 16 year period. This is likely to result in a reduction in population in these settlements (given declines in household size as the population ages); with implications for the sustainability of existing services;
  - Loughton, which is the District's largest town, sees a disproportionately low level of growth with housing growth of just 11%. With this level of growth, a notable ageing of the population would be likely with modest growth in those of working-age. With increasing online retail spending coupled with modest if any population growth, the vitality and viability of Loughton's Town Centre would be put at risk;
  - Given Loughton's size, its public transport connectivity and strategic highway infrastructure, and its identification in the settlement hierarchy (EB1007) as the District's main town, the town's potential to sustainably accommodate growth has been underplayed.

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<sup>2</sup> Taken from the Housing Implementation Strategy EB410

**Table 1.1 Analysis of relative Housing Growth in different Settlements**

	Existing Commitments	Proposed Allocations	Total Development	Population, 2011	Existing Dwellings, 2011	% Indicative Increase in Dwellings
<b>Harlow</b>	0	3900	3900	82059	35803	41%
<b>Loughton</b>	388	1021	1409	31106	13415	11%
<b>Waltham Abbey</b>	246	858	1104	18743	8339	13%
<b>Epping</b>	111	1305	1416	11461	5312	27%
<b>Buckhurst Hill</b>	52	87	139	11380	5117	3%
<b>Chigwell</b>	234	376	610	10365	3961	15%
<b>Ongar</b>	146	590	736	6093	2741	27%
<b>North Weald Bassett</b>	95	1050	1145	4477	1867	61%
<b>Theydon Bois</b>	18	57	75	3829	1584	5%
<b>Roydon</b>	53	62	115	1582	666	17%

**Issue 2: Beyond the Harlow area, is the distribution of development in the Plan justified having regard to the defined settlement hierarchy?**

**What are the key factors which informed the distribution of development in the Plan beyond the Harlow area?**

- 1.8 The 2018 Site Selection Report (EB805) does not suggest that a strategic approach has in any way been followed in determining what level of growth should be accommodated in other settlements in the District. As the analysis in the Table above shows, there is a poor relationship between the size of settlements and their level of facilities/ infrastructure and the level of growth

**How was the settlement hierarchy set out in Table 5,1, page 114 defined, and is it justified? Has the settlement hierarchy informed the distribution of development and if not, what is its purpose?**

- 1.9 Table 5.1 is based on the Settlement Hierarchy Technical Paper (EB1007). The hierarchy is based on the level of services and facilities in each settlement (as shown in EB1007 Table 3). This identifies Loughton and Epping as the most sustainable settlements in the District.
- 1.10 The Settlement Hierarchy has had limited and insufficient influence on the distribution of development. Page 121 in the Plan describes Loughton as having one of the District's two town centres; a significant retail offer; good public transport connectivity; and further and higher education provision. The vision for Loughton shown seeks to support this; but there is no evidence that these considerations have informed the distribution of development, influenced by a direction of a disproportionate scale of development to Harlow and North Weald Bassett; and stronger relative provision at Epping.

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- 1.11 The Site Selection Report (EB805) considers the attributes of sites compared to alternatives on a settlement-by-settlement basis, rather than addressing the bigger picture question of the distribution of development between settlements.

**Is it justified that North Weald Bassett (NWB) as a Large Village to be allocated more development than the Towns of Loughton, Waltham Abbey and Ongar? More generally, would the proposed growth at NWB be disproportionate, particularly when development at nearby Thornwood and Hastingwood is taken into account?**

- 1.12 We consider the level of development allocated at NWB to be disproportionate and do not consider it to be justified. This is clear from Table 1 above.
- 1.13 EB1007 Table 3 shows existing service provision in NWB. Whilst the scale of development will support delivery of employment, a primary school, health facilities and leisure centre, existing and new residents will continue to need to travel to access higher-order facilities including secondary and further education; banks; larger supermarkets; and rail services. Whilst the settlement will grow, it will not do so to the stage where there is potential for significant self-containment of trips to work or for these higher order services.
- 1.14 The scale of development allocated at NWB is also inconsistent with Plan Objectives C iii (to diversity the District's two town centres) and in particular E i) to locate new development where there the greatest opportunities for utilising public transport, cycling and walking.

**Issue 4: Is the distribution of development justified in respect of the need for, and approach to, Green Belt release?**

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**How do the specific development needs of the District weight against the importance of Green Belt protection?**

- 1.15 The Council has addressed this in the 2018 Green Belt Background Paper (EB1608).

**What would be the consequences of not releasing Green Belt land to help meet development needs?**

- 1.16 Broadly, the consequences would be a very limited level of new development in the District, with clear negative social and economic consequences including:
- Restricting the ability of local residents to access housing, and in particular affordable housing
  - Further deterioration in housing affordability constraining the ability of younger households to form and for working people locally to become home owners

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- Restricting growth in the District's workforce which could constrain economic performance and the ability of businesses to recruit
  - Limiting population growth with impacts on the district's town and local centres, which are under threat from growth in online retail spending.

1.17 At an HMA level, the option of focusing development at areas beyond the Green Belt was assessed in the SA of Strategic Spatial Options (EB203, Option X) and was considered unreasonable given the sub-regional geography.

**Are the changes proposed to the Green Belt boundary informed by a robust assessment of the contribution made by individual sites to the purposes of the Green Belt? How were the findings of the Green Belt Review weighed in the balance with other planning considerations in the site selection process?**

1.18 As assessment of the contribution to sites to Green Belt purposes has been undertaken to inform the selection of sites only after the distribution between growth at Harlow and elsewhere in the District had been determined. This is inappropriate and results in a situation where higher performing Green Belt sites are proposed for development (see EB1608 Para 3.15).

1.19 Had performance of Green Belt sites been assessed on a consistent basis, alternative sites with low performance against Green Belt purposes could have been brought forward instead.

**Having regard to paragraph 85 of the NPPF, and to the potential for an increased level of housing need in the District to be identified in the future, how has the Council satisfied itself that Green Belt boundaries will not need to be altered at the end of the Plan period? It is necessary to identify areas of safeguarded land between the urban area and the Green Belt?**

1.20 The NPPF is clear that Green Belt boundaries should be set having regard to their intended permanence in the long-term so they can endure beyond the plan period. The Plan does not do this.

1.21 The 2018 NPPF is clear that where an authority is not planning to meet its applicable local housing need figure (which would be the case here), it is likely to require early review. It is therefore reasonable to expect that the Council would need to review the Plan in the short-term and need to remove further land from the Green Belt to meet development needs.

1.22 The Plan has not been prepared with sufficient foresight meaning. It is clear that safeguarded land should therefore be identified and removed from the Green Belt now; and an immediate review of the Plan progressed.

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**Issue 5: Is the distribution of development justified in respect of the approach to flood risk; and to protecting water quality?**

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**Flood Risk**

- 1.23 East Harlow (SP 3.5) falls partly in Flood Zones 2, 3a and 3b as is the case for a number of the other sites listed in Q2.
- 1.24 It is clear that the Council has adopted an inconsistent approach to site selection, when other sites which fall partly within these zones have automatically been screened out in the Site Selection Report and Green Belt Assessment (e.g. EB705A Para 2.20).
- 1.25 The approach adopted is both inappropriate and inconsistent. For example, the Green Belt Stage 2 Assessment has discounted an obvious and logical Green Belt release site at Loughton (land parcel DSR-030) on the basis that part of the site falls partly within the flood plain. This approach is clearly erroneous and contrary to the approach outlined in Paragraph 3.14 of the Stage 2 Report, which indicates that in the absence of a distinct feature on the ground that corresponds to the edge of the constraint, the parcel may include the constraint within it, which is clearly the case with land parcel DSR-030.
- 1.26 There is potential for development of sites where part of a site is susceptible to flooding, as this area many not fall within the developable area and may be appropriate for open space or other uses.

**Waste Water Treatment Capacity**

- 1.27 Thames Water has identified notable capacity constraints at a number of WWTWs in the District. It is clear that an understanding of infrastructure constraints has not informed the site selection process. There appear to be outstanding uncertainties regarding the potential for improvements to Treatment Works in some instances, the timescales over which this may happen, and whether this may constrain housing delivery.