

Examination of Epping Forest District Local Plan (2011-2033)

Dandara Ltd Hearing Statement for Matter 4: The Spatial Strategy / Distribution of Development

- 1.1 This Hearing Statement has been prepared by Dandara Ltd (ID: 19LAD0129) in response to the MIQs raised by the Inspector for discussion in weeks one and two during 12th to 26th February 2019. This Statement should be read alongside Dandara Ltd's representations to the 2017 Submission Version Local Plan and supplemental representations to the 2018 Site Selection Evidence Base.

Issue 1

Does the distribution of development place too much reliance upon the Garden Community Sites around Harlow at the expense of testing capacity at other settlements?

- 1.2 Table 2.2 of the Regulation 19 Plan explains that circa 16,100 homes will be delivered in and around Harlow across the Plan period with 3,900 delivered on land surrounding Harlow but falling within EFDC. Table 2.1 demonstrates that Harlow will accommodate circa 32% of all housing delivered within the HMA over the Plan period. For EFDC, land on the edge of Harlow will accommodate circa 34% of the Districts growth.
- 1.3 Para. 6.3 of the 2017 SA (EB204) explains that *"Harlow was recognised as the most sustainable location within the HMA to focus residential development given its role as a sub-regional centre for employment, its Enterprise Zone status; its important location on the London Stansted Cambridge corridor and the wider economic growth aspirations for the town"*. The 2016 SA 'Strategic Spatial Options for the HMA' (EB203) explored spatial options for the delivery of housing across the HMA that primarily focused on exploring different levels of growth in and around Harlow (Section 1.3, pg. 3).
- 1.4 Our Hearing Statements for Matter 1, Issue 4 and Matter 3, Issue 1 explain Dandara Ltd's soundness concerns regarding the pre-determination of the SA process which tests spatial growth options that primarily differ based on the number of homes delivered around Harlow. This pre-determined focus on Harlow by the HMA authorities has not been objectively tested through the SA, including opportunities for other sustainable settlements to accommodate additional growth, especially those with a direct relationship with Harlow.
- 1.5 Our Regulation 20 representations raised the following concerns regarding the distribution of development placing too much reliance upon housing delivery at the Garden Community Sites around Harlow.

Reliance on Harlow Completions

- 1.6 Harlow as a location and housing market is not representative of the HMA including EFDC. Figure 21 of the 2015 SHMA (EB405) demonstrates that Harlow experiences significantly lower than average house prices and slower rates of house price growth than the majority of the HMA. Average house prices in Harlow ranged between £186,000 - £276,000 whilst almost all immediately adjacent areas, including EFDC, show average prices of £332,000 plus. This difference is clear when considering Harlow's 2017 lower quartile house price to earnings ratio of 10.81 which is not only significantly below the equivalent EFDC value of 16.08, but represents a ratio not seen in EFDC since 2011.

- 1.7 To be 'effective', the Plan must demonstrate that the quantum of new homes to be delivered around Harlow, both in total and when considered on an annualised basis, can be delivered by the market taking into account the comparatively depressed market conditions of the town. For example, Appendix 2 of the 2017 'Housing Implementation Strategy' (EB410) projects seven consecutive years when the three 'garden town communities' are cumulatively projected to deliver 400 dpa which represents circa 75% of total supply based on the OAN of 518 dpa. At the same time, land on the edge of Harlow is accommodating housing for the other HMA Authorities.
- 1.8 To be sound, the Plan must demonstrate that Harlow, as a localised housing market, is able to deliver this annualised number of homes. There is a real risk that one of the weakest performing local housing markets within the HMA in respect of average house prices and house price growth is unable to absorb such significant numbers of new homes without risking market saturation and a subsequent shortfall in required housing completions.
- 1.9 The OAN for Harlow itself is given within the 2017 SHMA update as 7,490 yet the town, including land adjacent to the existing urban edge, is expected to accommodate 16,100 homes. There is insufficient consideration of whether the market can deliver such numbers and whether Harlow as a location meets the aspirations of those future residents looking to live within EFDC and other constituent HMA authorities.

Harlow Infrastructure

- 1.10 Pg. 25 of the 2016 SA (EB203) concludes as follows:
- "The transport modelling indicated a 35-40% increase in trips on the network by 2033 based on 14,000 new homes in and around Harlow ... a major improvement at Junction 7 of the M11 and a new Junction 7A were both **essential** to deliver growth. It was also concluded that a major improvement at Junction 8 was also **essential** to support HMA growth ... it was also concluded that early delivery of a second crossing over the River Stort was **essential** ..."*
- 1.11 More information on the delivery of these essential highway improvements is included in the 2017 MoU covering highways and transport infrastructure (EB1201). Dandara Ltd has two principal concerns regarding the deliverability of the housing strategy and therefore the effectiveness of the Plan from a soundness perspective:
- (a) **Timing** - The MoU recognises at A2.2 that *"the M11 Junction 7 interchange is nearing capacity, which is constraining access to and from the M11. This in turn is constraining Harlow town's growth opportunities"*. Part B of the IDP (EB1101B) suggests that improvements to Jct 7 of the M11 will not be delivered until 2025-30 whilst the delivery of a left turn slip road from Jct 7a of the M11 will not be delivered until 2031-33. By 2025 the HIS housing trajectory (EB410) is anticipating 1,350 completions in Harlow on land falling within EFDC alone. Given the advice contained within the SA that these improvement works are **essential** to delivering growth, the Plan risks adding vehicles associated with 1,350 new homes onto the highway network prior to any improvements to Jct 7 of the M11 being completed, conflicting with para. 32 of the NPPF;
- (b) **Funding** – Improvements to Jct 7 of the M11 are costed within Part B of the 2017 IDP at £29 million. It is unclear whether full or part funding for such improvements, including a new Jct 7a, has been secured as without committed funding, the Plan is not 'effective' as the

quantum of new housing around Harlow may not be deliverable if essential highway improvements do not receive the necessary funding.

Harlow Viability

- 1.12 Concerns have been raised regarding the comparatively depressed housing market in and around Harlow compared with the remainder of the HMA. These market challenges may be exacerbated by the financial burden placed on future development to assist with funding significant infrastructure improvements required for the town to accommodate the scale of housing growth envisaged. The 2017 *'Viability Study Stage 2'* (EB301) concludes for strategic sites that whilst the proposed Harlow allocations are 'very likely' to be viable, "... *albeit (and as is always necessarily the case) with the achievable planning obligations packages needing detailed resolution in due course*". It is imperative to soundness that various viability scenarios are tested for development proposed at Harlow if, for example, a significant cost such as the £29 million M11 Jct 7 works are added to the overall planning obligation package.

Issue 1, Question 3

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?

- 1.13 Our Hearing Statements for Matter 1, Issue 4 and Matter 3, Issue 1 go into detail regarding Dandara Ltd's soundness concerns regarding the pre-determination of the SA process which tests spatial growth options primarily by reference to variations in housing numbers around Harlow. This focus on housing delivery surrounding Harlow, equating to 32% of EFDC's housing target, has impacted the vitality and viability of individual sustainable settlements over the Plan period.
- 1.14 Taking Roydon as an example, the 2011 Census reports that Roydon Parish contains a total of 1,119 households (www.nomisweb.co.uk). The Regulation 19 Plan identifies a total of 62 new homes for Roydon across the Plan period at Policy SP2 all of which will be delivered across two years being 2020-22. This represents only a 5.5% increase in total households compared with the 2011 Census up to 2032/33.
- 1.15 The number of homes allocated for Roydon is not an outcome of the sustainability of the settlement but, as explained within para. 5.124 of the Plan, "*the provision of approximately 62 homes has been informed by the aspiration for Roydon to maintain its existing character and local feel*". This approach is unsound for the following three principal reasons:

Relationship with Harlow

- 1.16 Para. 6.3 of the 2017 SA (EB204) is reproduced in para. 1.3 above and explains that Harlow represents the most sustainable location within the HMA to focus residential development. Whilst the SA and EFDC Plan uses the sustainability of Harlow to justify the allocation of 3,900 homes on its edge, it does not consider the role that existing sustainable settlements with a strong and direct relationship with the town could play in making best use of its sustainability credentials.
- 1.17 As para. 1.14 of the Plan recognises, "*there is one national railway station in the District at Roydon on the Liverpool Street to Stansted and Cambridge line ...*". Roydon station provides access into the centre of Harlow in less than four minutes with four trains departing

between 8am and 9am. Unlike the ‘garden communities’ proposed within the Plan, Roydon benefits from direct, regular and affordable train links into Harlow town centre where job opportunities are located. Roydon also sits on the London, Stansted, Cambridge corridor and provides direct services to these major centres.

- 1.18 The Regulation 19 Plan has missed a major opportunity to recognise the inherent sustainability of settlements such as Roydon which are geographically proximate to Harlow and provide ease of access by public transport modes. Instead, the allocation of only 62 new homes fails to take advantage of Roydon’s unique public transport connectivity and risks reducing by lack of growth the current regularity of train services.

Lee Valley Regional Park

- 1.19 As explained within our Hearing Statement for Matter 2, Issue 1, Roydon contains the only mainline railway station which serves the eastern part of the LVRP. Whilst the LVRPA published Park Development Framework highlights opportunities associated with Roydon station forming a sustainable ‘gateway’ into the Park, it identifies the western edge of the settlement as a ‘landscape enhancement area’ and ‘harsh, visually detracting edge’. The EFDC Local Plan misses an opportunity to build upon this sustainable ‘gateway’ into the Park by recognising opportunities for development to deliver positive, tangible improvements to the interface between the Park and settlement. Instead, the limited development proposed fails to support the vitality or viability of Roydon as a key nodal arrival point into the Park.

Sustainability Credentials

- 1.20 As explained in para. 3.3 of our Regulation 20 representations, Roydon also contains a range of shops, services and community facilities including primary school, shop, post office, public houses, village hall, church and a range of leisure / recreation facilities which serve the existing community. The delivery of only 62 new homes over a 22 year Plan period equates to only 3 new homes per year which does nothing to support the vitality or viability of existing services nor encourages additional services or facilities to establish within Roydon.

Issue 2

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

- 1.21 The settlement hierarchy for EFDC is established in Table 5.1 of the Regulation 19 Plan. It is informed by the 2015 ‘*Settlement Hierarchy Technical Paper*’ (EB1007) which is “... a *planning tool which identifies how existing settlements function and establishes a measure of relative sustainability of and between those settlements*”.
- 1.22 The Technical Paper uses a blunt method of assessment with 29 sustainability indicators considered for each settlement. All services and facilities are afforded the same weight being ‘1 point’. For example, Roydon station as the only mainline station in the District is afforded the same weight in sustainability terms as any other indicator including services that are not fundamental to the sustainability of a settlement including optician or fire.
- 1.23 Using Roydon as an example of the technical paper’s methodological deficiencies, the settlement scores 14 points and thus sits 9th out of 26 settlements assessed. Whilst Roydon is identified as one of twelve ‘smaller villages’ within the Table 5.1 settlement hierarchy, it has only one point less than North Weald Bassett (15 points) and three points less than

Theydon Bois (17 points) both of which are 'large villages'. Conversely, only Roydon (14 points), Abridge (12 points) and Naezing (10 points) achieve double figures with other 'small villages' gaining significantly less, as low as 3 points for Lower Sheering.

- 1.24 Pg. 62 of the Technical Paper recognises that “... **Roydon contains the necessary number of services and facilities to be considered a large village** ...”. However, this conclusion is preceded by the acknowledgement that “**strong representations have been received from local Ward Councillors, and the Parish Council on the position of Roydon in the Settlement Hierarchy**” leading to the conclusion that “... when taken in comparison with other settlements in both this category and the small village category, it would appear to fit more comfortably within the small village category”. What was intended as an objective technical evidence base document has clearly been influenced by external pressures to retain certain settlements within a specific tier of the settlement hierarchy.
- 1.25 Dandara Ltd considers that the settlement hierarchy is unsound being informed by a subjective evidence base which fails to recognise:
- The different value of particular services and facilities which contribute to the sustainability of a settlement. Consider the value of a railway station to the achievement of sustainability compared to the availability of an optician, both of which are ascribed the same sustainability value;
 - The inability to derive from Table 5.1 of the Plan the relative sustainability credentials of each settlement. For example, whilst Roydon and Lower Sheering are both classed as 'small villages', Roydon benefitted from a sustainability score of 14 compared to Lower Sheering's 3. Conversely, Roydon's 14 was only one point short of North Weald at 15 which is classified, despite having no railway station, as a 'large village'.
- 1.26 This lack of differentiation between settlements falling within the same settlement hierarchy tier, and the lack of differentiation between settlements within different tiers but with very similar sustainability scores, has led to the Regulation 19 Plan being unsound from a distribution of development perspective:
- NWB is to accommodate 1,050 homes within Policy SP2. If we compare this allocation to Roydon, which obtained one sustainability point less than NWB within the 2015 Technical Paper, growth for NWB is 17 times that of Roydon (62 homes versus 1,050). This is despite both settlements having almost identical sustainability scores;
 - Villages such as Naezing and Thornwood, which benefit from no railway station and obtained less sustainability points than Roydon being 8 and 10 versus 14, are to accommodate double and almost triple respectively the number of homes proposed for Roydon.
- 1.27 Dandara Ltd considers that the Table 5.1 settlement hierarchy is not informed by a sufficiently objective nor nuanced evidence base in the 2015 Technical Paper. It neither considers the relative sustainability merits of particular services or facilities, instead treating them all equitably, nor considers the large sustainability discrepancies between settlements that fall within the same tier. Furthermore, it is clear in the case of Roydon, a settlement that the Technical Paper notes warrants designation as a 'larger village' based purely on sustainability consideration, that external influences informed the decision to maintain its 'small village' status. These evidence base deficiencies have informed an unsound spatial

strategy where settlements with few public transport options are being identified for significant growth despite the availability of an inherently sustainable settlement in Roydon which accommodates the District's only mainline railway station, with connections to Harlow in four minutes, yet is allocated for only 62 homes.

Issue 4, Questions 1, 2 and 5

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

- 1.28 The EDFC Local Plan on pgs. 48 and 49 has adequately demonstrated that 'exceptional circumstances' exist in the context of NPPF para. 83. Given that Policy SP2 of the Regulation 19 Plan is 1,173 homes short of meeting full OAN as identified within the 2017 SHMA update and 92% of EFDC is Green Belt, it is clear that Green Belt release is required to deliver the number of homes necessary to satisfy the social strand of sustainable development as per NPPF para. 47.
- 1.29 The Local Plan is informed by a robust Green Belt evidence base comprising Stage 1 and Phase 2 assessments (EB704A and EB705A). The Green Belt evidence base is not however the reason why the Plan is unable to meet OAN. As an example, land being promoted by Dandara Ltd at Temple Farm, Roydon is assessed within the Stage 2 Green Belt Assessment on pg. 353 of the Technical Annex (EB705A and B). It concludes as follows:
- No contribution to checking urban sprawl;
 - Weak contribution to preventing merging;
 - Moderate contribution to safeguarding countryside from encroachment (n.b. proposed development parcel);
 - No contribution to preserving character of historic town.
- 1.30 Appendix B1.4.2, part 3 of the 2018 Site Selection Report (EB805Fiii) concludes for land at Temple Farm, Roydon (ref. SR-0303-N) that the *"site is within Green Belt, where the level of harm caused by release of the land for development would be very low, low or medium"*. The overriding NPPF objective of not developing on the most valuable Green Belt land is not therefore the reason that EFDC and the HMA are unable to meet OAN.
- 1.31 Dandara Ltd will consider the site selection process under Matter 5 but does consider that land which is not considered to materially contribute to the five main purposes of the Green Belt should be revisited and reassessed to achieve OAN.
- 1.32 The Inspector should be aware in the context of EFDC being unable to meet current OAN alongside the OAN increase applying the Government's standard housing method that there are available sites such as Temple Farm which do not result in any material harm to the Green Belt; are located in inherently sustainable settlements and benefit from mainline railway services including to the key HMA town of Harlow. Given the potential increase in housing target from the figure of 518 dpa to 923 dpa applying the standard housing method, it is considered that the Council will be required to look at future Green Belt release as part of a Local Plan review, assuming the Regulation 20 Local Plan is adopted.

Issue 6

Is the distribution of development justified in respect of its effect upon transport and other infrastructure in the District?

- 1.33 The 'vision' of the Regulation 19 Plan on pg. 19 aims to ensure that *"development needs will be met in the most sustainable locations"*. Despite this strong rhetoric, a significant number of proposed allocations fail to support this wider 'vision'. Examples have already been given of significant growth in locations such as NWB, Ongar and Thornwood which benefit from no railway stations and would require significant investment to ensure sustainable transport modes are optimised.
- 1.34 Whilst we recognise that the Plan is not being examined under the 2018 NPPF, we nevertheless draw attention to para. 138 which states that *"where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport"*. It is important for the Inspector to be aware, using Temple Farm, Roydon as an example, that in an Authority not achieving OAN, there are available sites which are located immediately adjacent to railway stations; are not considered to materially contribute to Green Belt purposes; can achieve various LVRPA objectives and in the view of the new NPPF representing latest Government policy, is sequentially preferable in terms of Green Belt release.
- 1.35 A 'step-change' in promoting sustainable transport use will not be achieved until the Council rebalances its spatial strategy away from growth in settlements poorly served by public transport and recognises opportunities associated with existing sustainable settlements that already benefit from good quality public transport. At present, the allocation of only 62 new homes at Roydon, which boasts EFDC's only mainline station, not only fails to build upon existing public transport infrastructure but risks undermining the future viability of the station by supressing growth.