



Phase 2

EPPING FOREST DISTRICT COUNCIL:

Examination of the District Local Plan 2011 – 2033

Examination Statement:

MATTER 4: The Spatial Strategy/Distribution of Development

On Behalf of

Bloor Homes Ltd

January 2019

Our Ref: C16133

Phase 2 PLANNING & DEVELOPMENT LIMITED

1. Introduction

- 1.1 The following Examination Written Statement has been prepared on behalf of Bloor Homes Ltd, who has land interests to the north east of the settlement of Ongar (Site ref SR-0051), and has made representations to the Submission draft of the Local Plan, promoting the land for housing, possibly as a first phase of a wider development to achieve a bypass for the town and other benefits.
- 1.2 As requested, this Statement does not duplicate those representations, but addresses where relevant the issues raised by the Inspector in her Matters, Issues and Questions relating to Matter 4, The Spatial Strategy/Distribution of Development, within the context of paragraph 182 of the 2012 Framework, which given the submission date of the Plan will be used as the basis for assessment.
- 1.3 It will use the same issue headings set by the Inspector, as follows.

Issue 1: Does the distribution of development in the Plan 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?

- 1.4 With regard to points 2 and 3 of this issue, it is important to note that the Framework emphasises that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed (NPPF para 59). This is recognised as the need to allocate sites for identified growth across the District and support development in sustainable locations and to meet development needs where they arise (Plan para 2.137).
- 1.5 This needs to be read in conjunction with NPPF para 7(c) which emphasises the need to reduce pollution and mitigating and adapting to climate change, including moving to a low carbon economy. This is a thread that has clearly influenced a number of the Inspector's questions within Matter 4.
- 1.6 It is clear that the 3 Garden Town Sites, which take up nearly half of the remaining housing requirement after deducting committed sites, coupled with the disproportionate expansion of other smaller settlements will draw a significant level of growth from other parts of the District, which will involve a number of settlements having their housing needs in part met by developments in other parts of the District.
- 1.7 In the case of Ongar which is defined as a District Centre, this results in an overall allocation of only 590 dwellings from 2011-2033. These have been distributed between settlements on a constraints basis (Policy SP2) rather than a proportionate approach, and this will be referred to later in this statement. In addition, there is no comment on the lack of housebuilding compared to needs over previous years on a settlement by settlement basis, for example in 2016 (5 Year Land Supply 2016-22), only 34 dwellings were committed by planning permissions in Ongar which were expected to contribute in the following 5 years.
- 1.8 It is important to also recognise the difficulties and clarity required in bringing forward strategic level proposals, as recently experienced by the North Essex authorities with the significant delay in the Examination due to the need for further background studies relating to 3 new Garden Settlements. In this case in a letter to the North Essex Authorities [NEAs] dated 10 December 2018, the Inspector has announced a pause in the examination while the NEAs carry out further work on the evidence base and Sustainability Appraisal [SA]. The Examination will not be reopened until this information is complete, leading to a significant delay.
- 1.9 In addition to the apparent difficulties in evidencing the deliverability of Garden Settlements within a Local Plan, the physical delivery of housing within such settlements is also fraught with delay and lengthy lead in times as strategic infrastructure requirements, such as roads, are often required before construction on houses can commence.

Therefore given the above, the delivery of a substantial proportion of the Council's remaining housing need from Garden Towns should be supplemented and supported by a range of housing sites. Indeed the reliance on Garden Towns increased the need for small and medium sized sites which can make an important contribution to meeting the housing requirement of an area as they can be built out quickly and contribute at an early stage to meeting needs in the early years of the Plan, particularly in a district that has fallen well short of its current five year housing supply.

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

- 1.10 In the context of para 1.7 above, table 5.1 in the Plan raised in issue 2, defines Ongar as a District Centre, as well as Epping, Loughton, and Waltham Abbey but with substantially the smallest housing allocation compared to these other towns, and indeed much lower than another settlement within a lower tier in the hierarchy.
- 1.11 In addition limited growth at Theydon Bois and Buckhurst Hill is lower than would normally be expected at second tier settlements. In addition, draft Policy SP2 proposes allocations for 175 dwellings in "small villages" which are locations that conflict with the "Core Principles" of the NPPF. These villages include settlement such as Coopersale, Fyfield, High Ongar, Lower Sheering, Roydon and Stapleford Abbots, all of which have little or no service base. These locations are therefore not sustainable locations for development of this scale and their identification is inconsistent with the Sustainability Appraisal.
- 1.12 As such it is clear that the settlement hierarchy set out in table 5.1 has no relevance to the distribution of development, which itself discords with Vision A(iv) and Objective A(ii) on pages 19 and 20 of the Plan. In particular given this discrepancy, it is not clear on what basis the distribution of development relates.
- 1.13 In addition, it is not clear that the proposed distribution best meets housing needs in the place that they occur. Para 1.41 of the Submitted Plan states that housing affordability in the District has been a significant problem in more recent times. This is the same for similar areas situated on the border of Greater London, which are attractive to city commuters. It goes on to state that the Council's own housing waiting list stood at 1,360 households in August 2016, significantly higher than other SHMA districts (figure 90 SHMA).
- 1.14 In support of this, table 4.1 of the Council's Housing Strategy document 2017-22 indicates that in the previous 4 years, very few affordable housing completions were made, with none in 2016/17. In addition, tables 4.2 and 5.2 of the same document suggest that at that time only 13 affordable dwellings were in the pipeline in Buckhurst Hill, Ongar and High Ongar.

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- 1.15 Affordable housing need is not broken down on a settlement basis, but we know from discussions with the Ongar Neighbourhood Plan Group that this is a significant problem in Ongar, and that the housing distribution strategy does not take this into account.
- 1.16 Clearly there has been very limited private and affordable housing developments in Ongar over the last few years that has not kept pace with housing need, and the limited allocation of housing to Ongar in the draft Plan falls short of addressing this. There is therefore scope to distribute further allocations in Ongar to address both existing and future housing needs.

Issue 3: Is the distribution of employment land in the Plan justified in light of the distribution of housing?

- 1.17 The Local Plan Objectives at point C(ii) state that 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. However, despite policy SP 2 at E(iii) promoting new small-scale employment opportunities within mixed-use developments, no employment allocations are made in Ongar.

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

- 1.18 With regard to points 2 onwards, the Council's background evidence to the Examination on Green Belt is provided by the Epping Forest Green Belt Assessment August 2016, which in Stage 2 assesses the contribution made by particular areas of land on the edge of settlements. We have in our previous representations pointed to a number of anomalies in the assessment, which have fed into the Site Assessments undertaken by Arup.
- 1.19 For instance, land on the east and north east of Ongar makes no contribution to Green Belt purposes 1 and 2 (figs 4.1 and 4.2), but like most other land around Ongar is noted as making a strong contribution to purpose 3 safeguarding the countryside from encroachment (4.3) and is also noted as having an impact on setting of an historic settlement (4.4). Given that the area of land assessed includes all land on the eastern side of Ongar, no distinction is made for land such as our client's land that is distant from heritage interests.
- 1.20 However, despite this, virtually all land is identified as having a high or very high level of harm to the Green Belt, including land that is the subject of allocations, some of which were harmful to 3 or more of the purposes, compared to only a purported 32 in the case of eastern Ongar.

1.21 As such we consider that the assessment is not sufficiently robust to justify the allocations made.

1.22 With regard to point 5, paras 5.16 and 5.17 of the 2016 Green Belt Assessment acknowledge that:

“Paragraph 85 of the NPPF indicates that, when defining Green Belt boundaries, local planning authorities should, where necessary, identify areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. No further guidance is provided on the circumstances where safeguarded land may be necessary

On the basis of current trends, there are likely to be unmet housing needs beyond the plan period. We therefore recommend that EFDC considers the need for safeguarded land. Where areas of the Green Belt are identified as being suitable for release in this plan period, parts of them may be retained as safeguarded land. The location of such areas should be informed by this study and other evidence”.

1.23 Despite the above, and despite the clear advice of para 83 that requires boundaries that will endure beyond Plan periods, the Council has failed to build in any flexibility beyond the Plan period, or indeed make any allowance for the Government’s increasing emphasis on the delivery of housing, which will in any case probably lead to an early review of the Plan, particularly as the Council are not proposing to meet their full objectively assessed housing needs..

1.24 As a consequence the Plan conflicts with the approach of para 85 of the Framework.

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

1.25 We have no specific comments in this regard, although the Inspector will note from our representations to the Submitted Plan that the omission site is located in zone 1.

Issue 6: Is the distribution of development justified in respect of its effect upon transport and other infrastructure in the District? Will the Plan be effective in securing the infrastructure necessary to support proposed growth?

1.26 The approach of the Plan in having a number of very small allocations on the edge of Ongar results in a piecemeal approach to obtaining contributions which often results in

improvements to infrastructure which are short term and the impact is likely to be restricted to the immediate locality of the site. Therefore the very small allocations are unlikely to deliver, through meaningful contributions, infrastructure that would mitigate existing problems within Ongar such as reducing traffic flows through the town or car parking provision, given the impact on viability of smaller schemes. Indeed, in the longer term, the small allocations are likely to have a negative impact on existing infrastructure.

The current strategy for Ongar therefore misses the opportunity to allocate a larger strategic residential allocation which could deliver and facilitate infrastructure improvements to Ongar, including potential part delivery of a new bypass, which we understand will be reserved within the emerging Neighbourhood Plan, together with leisure and employment uses which are closely aligned with the objectives of the draft Plan.

2 Conclusions on Matter 4

- 2 In relation to matter 4, it is submitted that the Plan is justified given the lack of clear background evidence in relation for instance to the definition of Green Belt boundaries and in relation to having a clear and justified Spatial Strategy. In addition, the Plan is not consistent with national policy in that it does not address the need to define Green Belt boundaries that endure beyond the Plan period, leading to uncertainty and the likely need for an early review of the Plan and further Green Belt releases to meet future housing needs.



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