



Strategic Planning & Research Unit

For and on behalf of  
**Peer Group**

**Epping Forest Local Plan Examination**  
Response to MIQ's Matter 8: GARDEN TOWN COMMUNITIES

**The Ongar Park Estate  
North Weald Bassett**

**Prepared by  
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## 1.0 MATTER 8 : GARDEN TOWN COMMUNITIES

1.1 The original objection to policies SP 4 and 5 were in the form of the ability of these sites to deliver in accordance with the councils proposed trajectory. The basis for this objection is our wide experience in the promotion of strategic sites and the understanding that the proposals in the plan as submitted require significant further work if they are to be deliverable. This means that as currently drafted the plan is unsound as it is not effective.

### **Issue 1: What is the “Garden Town” concept as applied to proposed allocations SP5.1, SP5.2 and SP5.3 and is this significant for planmaking purposes?**

**1. Are the four Garden Town Communities (including Gilston in East Herts) intended to function together in some way, or are the allocations essentially separate entities? Does this matter?**

1.2 There would appear to be no mechanism for these sites to function collectively as they are dispersed geographically and will have a greater relationship with the adjoining areas in Harlow rather than each other or the remainder of the EFDC.

**2. If the communities are intended to function together, is this possible in light of their physical separation? Will the requirement for separate Strategic Masterplans be effective in achieving coherent schemes?**

1.3 It is most unlikely that any meaningful co-ordination will occur between these sites given the range of promoters and the two LPA's involved.

**3. Does the Garden Town approach have specific implications for how infrastructure needs are identified and provided? Have Harlow and Epping Forest Councils worked together constructively in making decisions about where to provide health and education infrastructure, for example?**

1.4 In examples such as Milton Keynes this type of approach is dependant upon there being a single lead developer who undertakes the planning and pays for the infrastructure provision prior to parcelling up serviced areas of land. This approach is usually guided by a detailed master plan drawn up between the lead developer and the council.

1.5 Our experience this approach often translates into much longer lead in times as the whole of the area is master planned prior to the start on site.

### **Issue 2: Are the Garden Town allocations deliverable in respect of their impact on transport infrastructure?**

**1. Are the requirements of Policy SP5 in relation to transport sufficient to mitigate the effects of the proposed development in all three communities upon existing Junction 7 of the M11 and to ensure that adequate financial contributions are made towards the provision of Junction 7a? Is it the case that the provision of Junction 7a and associated infrastructure is a prerequisite of development on these sites and, if so, is this sufficiently clear in the Plan?**

1.6 According to the latest SOCG (draft) for Latton Priory the transport improvement works to Southern Way and Second Avenue corridor, and upgrades to Junction 7 of the M11 are required to be delivered ahead of development commencing. It is further noted that the site is still being promoted by the landowners and there is no lead developer at present which would in our experience be a prerequisite for the co-ordinated delivery of

this site as a Garden Village.

2. **More generally, are the highway and transport improvements sought by the policy expected in the form of physical works or financial contributions? Is this clear?**
3. **Essex County Council has indicated that the Latton Priory development could not deliver an essential north/south sustainable transport corridor. What difficulties does this present and can they be resolved?**

1.7 The inability to deliver this essential sustainable transport corridor appears to undermine the sustainability characteristics of the development and as such the allocation should be reappraised in the revised SA.

**Issue 3: Are the criteria in Policy SP4 justified, effective and consistent with national policy?**

1. **Will the criteria within Policy SP4(C) ensure that sufficient regard is had to the historic environment, including built heritage; townscape; archaeology; and designed landscapes, in planning generally for the Garden Town Communities? (Reps HE).**

1.8 In this situation where there has been little progress made towards producing detailed master plans as part of the development plan process, there is a need to at least try and secure a planned form of development on these strategically important sites via detailed development plan policies as are being proposed here. This is clearly a less satisfactory way of taking forward such strategic allocations and will undoubtedly result in delays as the interpretation of these policies and their consequences for land use and costs are worked through by the individual land owners and developers.

**Issue 4: Are the site allocations (SP5.1, SP5.2 & SP5.3) in Policy SP5 sound and deliverable?**

**All sites**

1. **Should Policy SP5 and the relevant supporting text exclude reference to the size of schools to be provided for flexibility? Should a land area be specified instead? Should the policy make it clear that financial contributions could be sought towards school provision?**

1.9 Given the fact that for some locations there is no lead developer the issue of land take and costs will become an issue. Our experience of such situations elsewhere is that these discussions are essentially focused around land equalisation agreements which can take considerable time resulting in a long lead in times for proposed allocations.

2. **Will sufficient employment land be available in/near to the new Garden Town Communities to “enable residents to meet the majority of their day to day needs” within them and to “maximise the use of sustainable transport modes” as required by Policy SP4? Has consideration been given to providing more employment land (and less housing if necessary to achieve this) within the relevant allocations? (Reps Harlow and ECC).**

1.10 The level of employment being planned is insufficient to develop a truly sustainable garden village. The policy refers to (SP 5 B) SP 5.1- 5.3 being expected to make provision for appropriate “small-scale” employment, retail and community uses in accordance with other policies within the Plan. The only actual employment allocation in the three Garden Villages is in Latton Priory (SP 5 part F (ii)). This allocates 1 hectare of employment land to be provided at Dorrington Farm.

- 1.11 In these circumstances the large residential allocations appear to be almost entirely reliant upon Harlow's economic performance as the sites are not well located to assist with meeting the future labour force requirements of the larger settlements in EFDC.
- 3. What effect would the development of sites SP5.1, SP5.2 and SP5.3 have upon the purposes of the Green Belt? What would be the impact of Site SP5.2 (Water Lane Area) on the identity of Broadly Common and Old House Lane in Roydon Parish?**
- 1.12 The tables on the next two pages highlight the impact on the green belt as assessed by The Green Belt Assessment Stage 2 (EB705A and 705B).
- 1.13 What is immediately clear from this summary of the council's evidence base is that all these proposed allocations are considerably more damaging to the purposes of the Green Belt than alternatives that have not been fully assessed in the SA.
- 1.14 The Peer Group site at NWB (SR-0269-N) for example has an average score of 5 compared to these allocations which have scores of 9 to 14. The comparable score against the "sensitivity test" (excluding Green Belt Purpose 3) of these allocations is between 6 and 9 this compares with a score of just 1.5 for the Peer Group Site (SR-269-N).
- 1.15 The potential sustainability gains from the Garden Village approach are not nearly as well developed in policy terms to justify this scale of impact on the green belt where there are reasonable alternatives which can deliver housing and that have a much lower impact on the green belt. These alternative sites within the District have the added sustainability advantage of actually meeting local need where it arises rather than on the edge of the district. The location of provision within the district rather than on its edge will have a greater impact in terms of addressing the issue of affordability within EFDC area.

**Table 1. Comparison of assessed green belt function from EB705B**

	Site Reference in Green Belt Appraisal	to check the unrestricted sprawl of large built-up areas	to prevent neighbouring towns merging into one another	to assist in safeguarding the countryside from encroachment	to preserve the setting and special character of historic towns;	to assist in urban regeneration
<b>East Harlow</b>	003.1	Strong	Relatively Weak	Strong	No contribution	Not Assessed
	004.1 (part)	Moderate	Relatively Strong	Strong	Moderate	Not Assessed
<b>Latton Priory</b>	073.1	Strong	No contribution	Moderate	No contribution	Not Assessed
	073.2	Strong	No contribution	Moderate	No contribution	Not Assessed
	073.3	Relatively Strong	No contribution	Moderate	No contribution	Not Assessed
	073.4	Relatively Strong	No contribution	Relatively Strong	No contribution	Not Assessed
	073.5 (part)	Relatively Weak	Moderate	Strong	Weak	Not Assessed
	053.1	Strong	No contribution	Moderate	No contribution	Not Assessed
	053.2	Relatively Strong	Relatively Weak	Strong	Weak	Not Assessed
<b>Water lane</b>	067.1 (part)	Relatively Strong	Relatively Weak	Strong	No contribution	Not Assessed
	067.2 (part)	Relatively Strong	Relatively Weak	Moderate	No contribution	Not Assessed
	066.2	Relatively Strong	Weak	Relatively Strong	No contribution	Not Assessed
	066.1	Relatively Strong	Weak	Relatively Strong	No contribution	Not Assessed

**Table 2. Comparison of Scores fro green belt function from EB705B**

	Site Reference in Green Belt Appraisal	to check the unrestricted sprawl	to prevent neighbouring towns merging	safeguarding the countryside from encroachment	to preserve the setting and special character of historic towns;	to assist in urban regeneration,	Score	Score without purpose 3	Average for allocation	Average for allocation w/o purpose 3
<b>East Harlow</b>	003.1	5	2	5	0	0	12	7		
	004.1 (part)	3	4	5	3	0	15	10	14	9
<b>Latton Priory</b>	073.1	5	0	3	0	0	8	5		
	073.2	5	0	3	0	0	8	5		
	073.3	4	0	3	0	0	7	4		
	073.4	2	3	5	1	0	11	6		
	073.5 (part)	5	0	3	0	0	8	5		
	053.1	5	0	3	0	0	8	5		
	053.2	5	3	5	1	0	14	9	9	6
<b>Water lane</b>	067.1 (part)	4	2	5	0	0	11	6		
	067.2 (part)	4	2	3	0	0	9	6		
	066.2	4	1	4	0	0	9	5		
	066.1	4	1	4	0	0	9	5	10	6

**4. Do the maps of the Masterplan Areas require amendment to clarify that the “residential site allocations” are also expected to include land for schools and other services and infrastructure? (Reps ECC).**

1.16 Given the number of landowners and developers, combined with the lack of lead developers results in a requirement for a much more detailed master plan dealing with the location of different land uses and the attribution of costs in order to ensure that the sites are actually deliverable as Garden Villages.

**Site SP5.1: Latton Priory**

**5. Will Policy SP5(F) effectively preserve or enhance the setting of designated and non-designated heritage assets to the south of the site, including Latton Farmhouse; Latton Priory; two scheduled monuments; and two moated sites? (Reps HE).**

1.17 These issues should have really been addressed by a detailed master plan produced alongside the Local Plan so as to provide clear guidelines for the development of these strategic sites. The lack of such detailed guidance puts in jeopardy the delivery of any

development on these sites and in particular the high objective of delivery of the sustainable Garden Villages concept.

- 6. Does the Masterplan Area shown on Map 2.2. provide sufficient points of access to achieve a sustainable connection route to the B1393 Epping Road? (Reps ECC).**

**Site SP5.2: Water Lane Area**

- 7. Is this site deliverable in respect of the multiple land ownerships involved? In particular, are the owners of the nurseries in the northern part committed to the development?**

- 1.18 As highlighted above to deliver the Garden Village approach usually requires an agreement between land owners and a lead developer who is able to secure the permissions and then sell off serviced plots often accompanied by a design guide produced between the lead developer and the council.
- 1.19 At present there are a number of land owners and two sets of developers (albeit the West Katherines Consortium is made up of 3 housebuilders). None are taking on the role of Lead developer in terms of driving forward a comprehensive master plan and resolving the appropriate share of funding the required infrastructure.
- 1.20 At present the council have failed to secure Planning Performance Agreements with all parties. It is noted that there is an agreement to produce a draft Master Plan for the whole area the timing is still uncommitted. The need for one landowner to make provision for a new school will need to be resolved in terms of land values as this will place a cost on one land owner compared to others. Whilst this may be remedied by equalisation agreements there is no indication that these have been achieved. This potentially represent a serious delay in the delivery of this site.
- 1.21 The requirement to provide either on site or off site SANG's is a further issue of cost/land take which is still unresolved.
- 1.22 This approach in our view will increase the lead in time for the development and reduce the rate of delivery from the site as currently anticipated by the council in their trajectory.

- 8. Historic England states that this site includes part of the Nazeing and South Roydon Conservation Area and three Grade II Listed Buildings. Has regard been had to them in making this allocation and will Policy SP5(G) ensure they are preserved or enhanced? Will the setting of the numerous heritage assets in close proximity also be preserved or enhanced? (Reps HE).**

**Site SP5.3: East of Harlow**

- 9. Map 2.1 shows that the Masterplan Area for this allocation crosses the boundary with Harlow. Have the Councils worked together to ensure complementary proposals for this area?**
- 1.23 Given that the location of the new secondary school appears to remain unresolved this does not suggest close joint working.
- 10. Are the requirements in Policy SP5(H) intended to apply to the whole Masterplan Area or only to the part within Epping Forest? Should this be clarified? In particular, is the "local centre" required by Part H(v) needed to support the whole area or just that in Epping Forest?**



- 1.24 These issues are required to be addressed by a joint master plan and this should have been available for consideration at the same time as the submitted plan. Without guidance on these issues there is no clarity about delivery and this renders the allocation and hence the plan ineffective and hence results in the plan being unsound.
- 11. I understand that no firm decisions have been made about the preferred location for the new hospital campus or secondary school referred to in Part H(vi) and (viii) respectively. On this basis, is it justified to include these requirements in the Policy? What will happen to the land safeguarded for these purposes if ultimately it is not needed? Should this be clarified?**
- 1.25 Again, this highlights the lack of co-ordination and the absence of an appropriately detailed Master Plan to clearly demonstrate the proposed allocation is deliverable.
- 12. Should part H(xvi) concerning surface water run-off to Pincey Brook also require any increased volume of water discharging into the Brook to be mitigated? (See reps ECC).**
- 13. Are the requirements of Part H(xii) concerning the highway works required too specific at this stage? Should this part be reworded to allow for detailed solutions to be determined at the planning application stage? (Reps ECC).**

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