EPPING FOREST DISTRICT LOCAL PLAN EXAMINATION

MATTER 8: GARDEN
TOWN COMMUNITIES

ID: 19LAD0121

INEMETAIS SNIMA

Date: February 2019

On behalf of: Pigeon Investment Management Ltd

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MATTER 8 – GARDEN TOWN COMMUNITIES

Introduction

- 1.1 This Matter 8 Statement has been prepared by Carter Jonas LLP on behalf of Pigeon Investment Management Ltd (Pigeon) to respond directly to the Inspector's questions for this Matter. The Statement only responds to the Inspector's Questions which are relevant to Pigeon's interests. Representations were submitted to the Epping Forest District Local Plan 2011-2033 (EFDLP) on behalf of Pigeon (Id. 19LAD0121). Pigeon are promoting land East of Epping for a residential-led mixed use development for around 400 dwellings (or greater)(Site Ref. SR-0153), which is generally consistent with the 2016 draft EFDLP (Regulation 18) which proposed at least 930 homes shared between South (not the Regulation 19 South) and East, but with East having a frontage onto Stewards Green Road included to provide independent access to East Epping and south being land east of the railway line. Pigeon has also promoted a more extensive area of land at East Epping based on Garden Settlement principles, replacing the allocation of 950 homes South of Epping. Alternatively, East Epping could in full or part supplement the South Epping preferred allocation.
- 1.2 East Epping has been promoted as a site that could deliver a mix of uses providing added benefits for Epping, including: a range of housing typologies including a high proportion of bungalows and self-build plots; a high quality mixed use community hub which could include a local convenience store and doctor's surgery and car parking to serve the local facilities and nearby tube station; a C2 Care Village; Primary School site; potential leisure centre with sports pitch provision; and an Eastern link road between Steward's Green Road and Stonards Hill which would assist in reducing traffic having to travel through the Town Centre.

MATTER 8: Garden Town Communities

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?
- 1.3 It is expected that the four Garden Town Communities would be delivered independently of one another, and in due course it is anticipated that they will function as separate communities but part of Harlow. The relationship between the four Garden Community Sites does matter. However, as set out in Pigeon's Matter 6 Hearing Statement, the close proximity of these four developments will have some impact on housing delivery rates at the sites, and as such these allocations will have some relationship with one another during the delivery phase. In addition, the close proximity of other strategic sites within Harlow that are still under construction or allocated on the edge of Harlow will also affect delivery rates at the three Garden Community Sites e.g. development is still being completed at New Hall on the eastern edge of Harlow. There is no evidence in the Housing Implementation Strategy [Doc Ref. EB410] or any other evidence document, that realistic delivery rates have been applied to the predicted housing delivery rates at the four developments to take into account their close proximity to one another. It is likely that all four developments will compete for housebuilders and some are likely to be involved in the delivery of more than one development parcel in the different allocations. It is also likely that the four developments will compete for house purchasers, and those that seek to purchase a new house in Harlow will have a choice between housebuilders and sites. The completion between housebuilders and sites for house purchasers will affect delivery rates. It is requested that housing delivery rates at the four garden community developments around Harlow reflect the close proximity of these sites.

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

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?

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- 1.4 It appears that the Councils are working together on the strategic masterplan for strategic allocation at East of Harlow. However, there is no evidence that the assumptions about housing delivery for the parts of the site within Harlow and Epping Forest District are complementary.
- 1.5 The land East of Harlow is allocated for a combined total of 3,350 dwellings, with 2,600 dwellings within Harlow District and 750 dwellings within Epping Forest District. Map 2.1 in EFDLP (see pg.39) shows the relationship between the two parts of the proposed allocation. It is highly likely that the first part of this development to be completed will be on land adjacent to the existing urban area i.e. land within Harlow District, and for practical reasons this is what would happen in order to deliver infrastructure and to connect neighbouring developments with one another. The Trumpington Meadows development on the southern edge of Cambridge is an example where the first phase of a strategic development is delivered adjacent to the existing urban area; this site crosses the administrative boundary between Cambridge and South Cambridgeshire, and development has been delivered within the Cambridge area for a number of year but dwellings have only recently been delivered within South Cambridgeshire. It is considered that the way that the East of Harlow development would be delivered is similar to that of Trumpington Meadows. Therefore, it would be realistic to assume that the 2,600 dwellings within Harlow District would be delivered in advance of the part of the development within Epping Forest District. It would take approximately 13 years for housing to be delivered at the East of Harlow site within Harlow District once planning permission has been granted; assuming a housing delivery rate of 200 dwellings per annum. As such, the housing at the East of Harlow site within Epping Forest District would not occur until beyond the plan period for EFLDP i.e. 2033. On this basis, Pigeon request that the 750 dwellings included in the housing supply from the land at East of Harlow are deleted from the housing trajectory and the housing land supply for sites on the edge of Harlow.
- 1.6 It is considered that additional sites will need to be allocated to make up the shortfall that will result when realistic delivery rates are applied and the supply from the land East of Harlow site within Epping Forest District is deleted because it will not be delivered during the plan period. The shortfall will be at least 750 dwellings, and probably much more when realistic delivery rates are applied.

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