

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

Dandara Ltd Hearing Statement for Matter 8: Garden Town Communities

- 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 three and four during 19th to 27th March 2019. This Statement should be read alongside Dandara Ltd's representations to the 2017 Submission Version Local Plan, supplemental representations to the 2018 Site Selection Evidence Base and Matters 1-4 Hearing Statements.

Issue 2

Questions 1 to 3

- 1.2 Figure 3 of the 2017 MoU on Highways and Transportation Infrastructure for the West Essex / East Hertfordshire HMA (EB1201) identifies a total of 16,100 new homes to be delivered in and around Harlow over the Plan period (n.b. reflected in Table 2.1 of the Plan).
- 1.3 The 2016 SA of strategic spatial options for the HMA (EB203) identifies on pg. 25 that based on housing growth of 14,000 in and around Harlow, "*... transport modelling indicated a 35-40% increase in trips on the network by 2033*". For Harlow to accommodate this level of growth without generating adverse impacts, conflicting with para. 32 of the NPPF, the SA advises the following:
- a major improvement to Junction 7 of the M11 is **essential** to deliver growth;
 - a major improvement to Junction 7a of the M11 is **essential** to deliver growth;
 - a major improvement to Junction 8 of the M11 is **essential** to deliver growth;
 - early delivery of a second crossing over the River Stort is **essential** to deliver growth.
- 1.4 The 2016 SA concludes that "*in terms of the level of development that can be accommodated in and around Harlow, the transport modelling undertaken to date indicates that growth of between 14,000 and 17,000 new homes in and around Harlow could be accommodated provided that key mitigation measures are delivered **during the Plan period***" (pg. 25).
- 1.5 More information on the delivery of these essential highway improvements is included in the 2017 MoU covering highways and transport infrastructure within the HMA. There are two principal concerns having reviewed the MoU:

Timing

- 1.6 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. Highways England and Essex County Council are investigating solutions and are working together to develop improvements to Junction 7, and a proposal for a new Junction 7A*". The MoU acknowledges at A2.3 that "*Highways England is at the very early stages of developing these proposals and once they have been refined, the scheme will go out to consultation*".

- 1.7 Part B of the 2017 Infrastructure Delivery Plan (EB1101B) suggests that improvements to Junction 7 of the M11 will not be delivered until 2025-30 whilst the delivery of a left turn slip road from Junction 7a of the M11 will not be delivered until 2031-33.
- 1.8 Having regard to Appendix 5 and 6 of the 2019 Housing Implementation Strategy Update (EB410B), housing completions are expected to start on the EFDC Harlow Garden Town Communities from 2022/23 with 150 completions which by 2025/26, being the earliest that Junction 7 improvements could be delivered, have risen to 1,200.
- 1.9 Given the clear advice contained within the SA that these improvement works are essential to delivering growth, we would question whether the Plan is in accordance with the NPPF by adding vehicles associated with 1,200 new homes onto the highway network prior to any improvements to Junction 7 of the M11 being completed, resulting in a significant adverse impact in conflict with para. 32 of the NPPF.
- 2.0 We consider that it is imperative that the Plan is modified to clarify the following:
- How many homes, if any, can be completed associated with the Harlow Garden Town Communities prior to the completion of the M11 Junction 7 works;
 - How many homes, if any, can be completed associated with the Harlow Garden Town Communities prior to the completion of the M11 Junction 7a works;
 - How does housing to be delivered through the EFDC Local Plan relate to other Garden Town Communities being delivered in neighbouring Authorities. As an example, if only a certain number of homes can be occupied prior to completion of the M11 Junction 7 and 7a improvement works, what is the implication on potential completions from EFDC if new homes at Gilston in East Hertfordshire have come forward earlier, taking-up the available M11 infrastructure 'headroom'.
- 2.1 It is also unclear whether financial contributions obtained from the Garden Town Communities, either via CIL or S106 obligations, are required to fund or part fund the essential infrastructure set out in para. 1.3 above, particularly that associated with the M11. It is imperative for the soundness of the Plan that the Council can demonstrate that funding is in place for these essential infrastructure upgrades especially as funding obtained directly from development may lag behind infrastructure spending if there is a limit on housing delivery prior to the infrastructure being delivered.

Issue 4

- 2.2 In response to the Inspector's query regarding the soundness and deliverability of the Harlow Garden Town Community proposals, we would reiterate two strategic points made within our Regulation 20 representations and under Matter 4.

Market Demand

- 2.3 As shown in Table 2.2 of the Plan, there is cumulatively proposed to be delivered 9,550 new homes as part of the Garden Town Community proposals alongside a further 6,600 dwellings to be delivered in Harlow itself giving a combined total of 16,150. There are two main soundness concerns that we have raised regarding the distribution of development.

Harlow Housing as Percentage of EFDC OAN

- 2.4 Within Policy SP2, there are a total of 9,816 new homes to be delivered across the various settlements listed. Of this 9,816 figure, a total of 3,900 new homes are to be delivered as part of the Harlow Garden Town Communities proposal, representing 40% of total supply.
- 2.5 As can be seen from Figure 21 of the 2015 SHMA (EB405), Harlow experiences significantly lower than average house prices and slower rates of house price growth than the majority of the HMA. Current average house prices in Harlow range between £186,000 - £276,000 whilst almost all immediately adjacent areas, including Epping Forest District, show average prices of £332,000 or more. As discussed at the Matter 3 Hearing, this is reflected in the house price to earning ratio for Harlow being significantly healthier than for EFDC.
- 2.6 To satisfy the 'effective' test of soundness, the Plan must demonstrate that the quantum of new homes, both in total and when considered on an annualised basis, can be delivered by the market taking into account the comparatively depressed market conditions in and around Harlow. For example, if one has regard to the Appendix 5 and 6 Housing Trajectory contained in the 2019 Housing Implementation Strategy (EB410B), the Council are projecting that from 2022/23 there will be significant new homes delivered on the three Garden Town Communities located to the south, west and east of Harlow on land falling within EFDC.
- 2.7 There are numerous years when these three Garden Town Communities are cumulatively projected to deliver 400 dpa which represents circa 75% of total supply based on the published OAN of 518 dpa. The Council must demonstrate that Harlow, as a localised housing market area, is able to deliver this annualised number of new homes. This is particularly important not only because it represents a significant proportion of EFDC's own OAN but because Harlow will also be expected to accommodate a further 12,250 new homes comprising Garden Town Communities in East Herts and Harlow District as well as housing within urban Harlow which are projected to be delivered during a similar period.
- 2.8 There is a real risk that one of the weakest performing local housing market areas within the HMA in respect of average house prices and house price growth is unable to absorb such significant numbers of new homes within what is a relatively localised market without risking market saturation and a subsequent shortfall in required housing completions. Demand for housing in Harlow is proportionally much weaker than elsewhere in the HMA.

Relationship to Harlow OAN

- 2.9 Figure 5 of the 2017 SHMA (EB407) identifies an OAN for Harlow District of 7,409 over the period 2011-33 equating to 337 dpa. In contrast, if the Garden Town Community proposals are added to housing planned for the existing urban area of Harlow, a total of 16,150 dwellings would be delivered. This represents 218% of the identified OAN.
- 2.10 Dandara Ltd recognises the inherent sustainability of Harlow as a settlement given existing levels of employment and public services as well as its location on the London-Stanstead-Cambridge rail corridor. We do however have concerns that objectives related to supporting the regeneration of Harlow through new development, to an extent which is significantly above its OAN, does not sufficiently take into account market demand, market conditions and personal aspirations about where individuals look to purchase a property. Market choice is an important consideration, especially given the differences between parts of Epping

Forest and Harlow, which has not sufficiently been taken into consideration as part of the Garden Town Community Proposals.

- 2.11 Dandara considers that the Plan should recognise that housing does not have to be located on the edge of Harlow to benefit from the inherent sustainability of the settlement. Roydon as a settlement is located immediately to the west of Harlow, is served by direct train services taking four minutes, and has low value Green Belt on the western settlement edge closest to the station that is not proposed for development due to a flawed site selection process. Settlements such as Roydon offer an adjustment to the spatial strategy that recognises the benefits of locating new homes close to Harlow, accessed by public transport modes, but does not represent a distortion of housing need and demand which ignores market signals, market attractiveness and market choice.