



Latton Priory, Harlow

Epping Forest Local Plan Examination
Response to Matter 11



Boyer

Report Control

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MATTER 11: HOUSING

Issue 1: Will Policy H1 be effective in securing an appropriate mix of housing?

Q1: Is Part A sufficiently specific in relation to the mix of housing required such that a potential developer would know how to react to the policy? Should it reflect up to date evidence on the actual mix required?

- 1.1 Yes, generally the wording of this policy provides an appropriate balance between allowing for flexibility and site-specific judgements, whilst also directing developers to consider the most up-to-date assessment of housing need (as relevant to housing mix). It is important that applicants are able to respond to market conditions and demand, in order to ensure deliverability.

Q2: Does the policy, and the Plan generally, do enough to support the specific needs of older people?

- 1.2 Yes, we consider the Plan supports action to meet the needs of older people via the provision it makes for accessible and adaptable homes (subject to the evidence necessary to support this – see Q4 below) and through its support for the provision of specialist accommodation in Policy H1 sub paragraph E (again where this is appropriate and there is evidence to support its provision).

Q3: Is Part D, which simply cross-refers to Policy H2, necessary? Could it be deleted for clarity/simplicity?

- 1.3 Yes, it duplicates guidance which is more fully expanded in Policy H2 and could therefore be deleted.

Q4: Does the policy require all new homes to meet the Optional Technical Standards M4(2) and/or M4(3) of the Building Regulations for accessible & adaptable dwellings and wheelchair user dwellings respectively? If so, is the need for these standards justified by evidence such as that suggested by the PPG? Should the policy allow for consideration of site specific factors which might render such standards unachievable or unviable?

- 1.4 We generally support the principles of this policy and regard it as lending to a flexible, rather than prescriptive, approach. Nonetheless, the Council does need to present a clear justification for application of optional standards (M4(2) and M4(3)), including an assessment of any potential impact on development viability.

Q5: In Part E, should the term “specialist accommodation” be defined? How will unmet need for specialist accommodation be identified? Is compliance with this part of the policy dependent upon development viability and the identification of a specific provider of the specialist accommodation?

1.5 No comment.

Q6: Will the policy be effective in providing opportunities for self-build/custom housebuilding? Having regard to the duties set out in the Self-build and Custom Housebuilding Act 2015, should the Plan set out how many such homes it aims to deliver, and should it be stronger in terms of how the necessary land will be secured?

1.6 The policy is judged to be in accordance with national policy, which directs Council's to work closely with land owners to identify appropriate sites for self-build and custom-build housing. It is considered that this approach lends to flexibility and market responsiveness, and avoids a prescriptive 'percentage-based' approach (as adopted in other Local Plans) which tends to result in an overprovision of self-build plots, compared to market demand for such.

Issue 2: Will Policy H2 be effective in securing the delivery of sufficient affordable housing of an appropriate type and size? Are the requirements for affordable housing provision from market sites justified by reference to evidence of development viability?

Q1: Paragraph 3.9 states that 2,851 affordable homes are required over the period 2016-2033. How many is the Plan aiming to provide as a result of Policy H2? If the requirement for 2,851 would not be met, has consideration been given to increasing the total housing requirement to help deliver more? Should the number of affordable homes expected to be delivered over the Plan period be specified in the policy for monitoring purposes?

1.7 In our statements for Matters 1 and 3, we note that the Council recognises its OAN as 12,573 additional dwellings for the Plan period, as established by the 2017 SHMA update. In these statements we suggest that the Plan should meet that more recent figure and introduce modifications to achieve it. Clearly, as the proposed level of housing provision in the Plan is currently below the OAN this will impact adversely on the provision of affordable housing. This is an important additional consideration for the purposes of deciding whether the planned level of provision is sound. We consider there is a need to increase the Plan's housing target to deliver more affordable homes and meet the need for homes of all types and tenures.

Q2: Harlow DC has expressed concern that the Plan is silent on the matter of addressing unmet need for affordable housing in Harlow. What is the detail of this concern and is it an issue for the Plan?

1.8 There is a case for such matters being addressed at the HMA level, via an updated Memorandum of Understanding and to increase provision in Epping Forest District if the consideration of this matter suggests this is necessary. Nonetheless, it is relevant that masterplanning work being progressed in relation to the proposed Latton Priory allocation, suggests that the site has a capacity of approximately 1,500 dwellings, rather than the 1,050 presently envisaged. An uplift in overall provision at this allocation would provide a corresponding increase in affordable housing provision within the Harlow and Gilston Garden Town.

Q3: Is the Plan/this policy justified, effective and consistent with national policy in respect of the need for Starter Homes?

- 1.9 The Plan is being considered under the transitional provisions for the implementation of the NPPF (2019), such that it is to be assessed under the auspices of the archived NPPF (2012). The 2012 NPPF makes no reference to Starter Homes. Nonetheless, the Planning Practice Guidance concerning the matter (published on 27 March 2015) does make provision for Starter Homes and the concept is defined through legislation ('Housing and Planning Act 2016').
- 1.10 Accordingly, and whilst recognising that the supporting text to the Plan (at paragraph 3.13) does state that Policy H2 is intended to be flexible enough to accommodate future changes in national policy, the wording of this policy could nonetheless be clarified to ensure it is clear that alternative affordable housing formats may (where appropriate) be recognised as such, for the purposes of decision-taking.

Q4: Is the requirement for sites accommodating 11 or more dwellings to provide 40% of the units as affordable justified by viability evidence? As the threshold for making provision will be lower than the current plan level of 15 or more dwellings, is there a risk that the viability of sites providing 11-15 dwellings will be undermined in the short term? Is there a case for staggering the requirement so that it does not come into force immediately? (Reps 19LAD0022).

- 1.11 The policy allows for viability matters to be considered at the decision-taking stage and sets out a flexible approach for addressing such concerns. This occurs through the introduction of a transparent cascade of options, which allow development values to be successively replenished to the point that development may be rendered viable. This will help to facilitate delivery on constrained sites and in those instances where a viability case has been properly established, through a detailed financial and viability appraisal. It is relevant that the Plan is being considered under the transitional arrangements, such that it is to be assessed under the provisions of the NPPF 2012. The policies of the 2012 Framework are clear that viability matters require detailed consideration at the planning application stage.

Q5: Is it justified to apply the requirements for affordable housing to all types of housing, including that falling within Use Class C3?

- 1.12 The policy does not appear to address the question of whether affordable housing requirements should apply to types of housing other than within use Class C3 and there is no evidence to suggest its scope should be extended.

Q6: Does the requirement in Part A concerning build standards duplicate the requirements of Policy H1, Part A(v)? If so, should it be deleted?

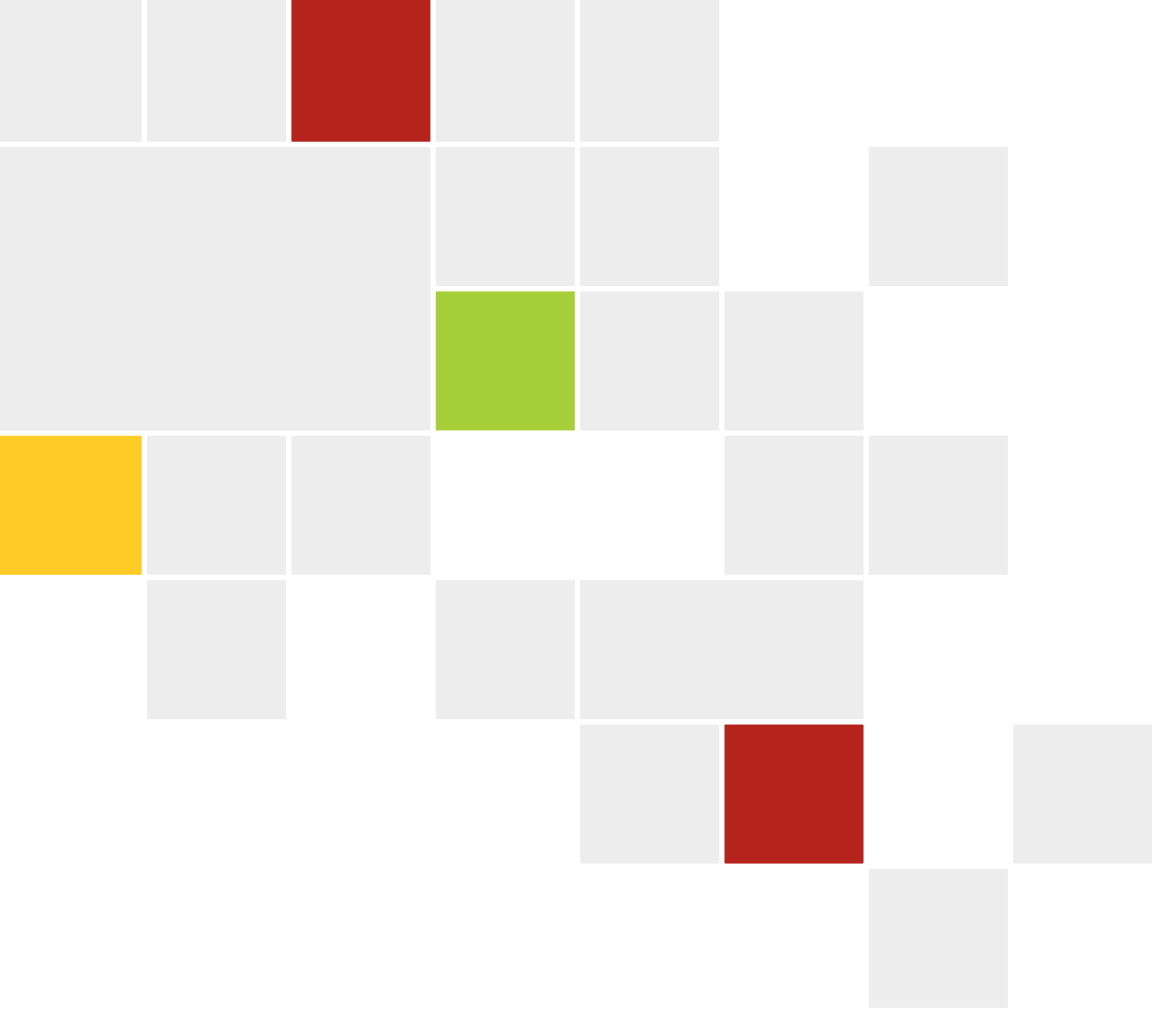
- 1.13 Yes it does appear to duplicate the provision within Policy H1 A(v) as this appears to be intended to apply to dwellings of all tenures.

Q7: Is there duplication between Part A and Part C of the Policy in respect of the mix of affordable homes required? Should the policy be more specific about the actual mix expected, or clarify where up to date evidence on this matter can be found? Is Part C justified in generally requiring the mix of affordable homes to reflect the mix of market housing? Would this meet the specific needs of those requiring affordable housing? Would it produce unnecessarily large houses that would not be genuinely affordable?

- 1.14 Yes, there is some degree of duplication. For clarity, it is suggested that reference to the mix of affordable housing (within Policy H2) should be restricted to Part C.
- 1.15 Part C would benefit from clarification, such that it is clear that the mix of affordable housing should be based on the latest available evidence of need for affordable provision, taking into account local needs and site-specific considerations. The appropriate mix of affordable and market housing (when based on an assessment of available evidence and local needs) is unlikely to be entirely consistent. The policy should be reworded to reflect this.

Q8: Part E of the policy indicates that the appropriate tenure mix is set out in the Policy, but it is not. Does this require correction?

- 1.16 Yes, the wording of the policy should be generally reviewed to ensure clarity.



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