

**Epping Forest District  
Council  
Examination**

**Hearing Statement  
Matter 3**

**Rachel Bryan  
On Behalf of  
Mr Martin Eldred  
19LAD0034**

**Sworders  
January 2019**



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## 1.0 INTRODUCTION

- 1.1 This hearing statement considers Matter 3 – Quantitative Requirements for Development, specifically, Issue 2.
- 1.2 It is submitted on behalf of Mr Martin Eldred, landowner of sites NWB.R1 and NWB.T1, (19LAD0034).
- 1.3 This Hearing Statement supplements Regulation 19 representations made on behalf of Mr Eldred in January 2018 and supplementary representations relating to the site selection report appendices in April 2018 and considers the Inspector’s Matters, Issues and Questions in relation to Week 2 Matter 4 of the Epping Forest Local Plan Examination.
- 1.4 **I confirm I wish to rely on this written hearing statement only and do not wish to participate in the hearing session. However, I would like to participate in further sessions, as appropriate.**

## 2.0 ISSUE 2: DOES THE PLAN INCLUDE AN APPROPRIATE TARGET FOR ACCOMMODATION FOR GYPSIES AND TRAVELLERS AND TRAVELLING SHOWPEOPLE IN THE DISTRICT?

- 2.1 In response to **Question 1**, we consider that policy SP2 and associated supporting text at paragraph 2.46 lacks clarity regarding the identified need for Gypsy & Traveller pitches. As such, it is inconsistent with paragraph 154 of the National Planning Policy Framework (NPPF).
- 2.2 Furthermore, the timing of delivery in the trajectory does not demonstrate that all the identified sites will be delivered in the timescales identified by the need. As such, the proposed target will not be deliverable meaning the plan is not positively prepared in respect of meeting this need, therefore inconsistent with paragraph 182 of the NPPF and paragraph 10 of the Planning Policy for Traveller Sites (PPTS).
- 2.3 Paragraph 2.46 refers to a requirement of 64 pitches to support the needs of the Gypsy and Traveller community and one yard to support the needs of Travelling Showpeople



over the period of the Local Plan (2011-2033). Table 2.4 deducts completions (16) and planning permissions (16) since the start of the plan period to identify a remaining requirement of 32 pitches and 1 yard to be identified through the LPSV allocations.

- 2.4 Policy SP2 identifies a provision of 38 pitches and 1 yard to be provided through allocations. These comprise the Garden Community allocations, NWB.T1 and WAL.T1 which total 25 pitches with the remaining 13 pitches shown in appendix 5 coming from rural sites. This equates to a total provision of 38 pitches.
- 2.5 However, SP2 does not set out the need, contrary to paragraph 3.23 which states that it does.
- 2.6 Clarity is required regarding the differences between “need”, “remaining requirement” and “provision”.
- 2.7 Regarding timing of deliveries, Appendix 5 of the LPSV contains trajectories for housing, employment and traveller sites. The trajectory for Traveller provision shows the bulk of deliveries in the early years of the plan, between 2017 and 2022 which comprises the rural sites, extant permissions and NWB.T1.
- 2.8 We do not consider that site NWB.T1 is deliverable within the timescales envisaged in the trajectory.
- 2.9 Site NWB.T1 is shown occupying the same site areas as NWB.R1 on map 5.12 and appendix 6. It is proposed to be delivered as part of the NWB Masterplan Area to deliver 1,050 dwellings through policy P6.
- 2.10 The traveller trajectory shows delivery between 2017 and 2022, however, the Housing Trajectory in appendix 5 shows the first deliveries for NWB.R1 in 2020 and completion by 2033. The Housing Trajectory Implementation Update Discussion Paper, 12 December 2018 pushes out the first deliveries for NWB.R1 to 2022/23 and completion in 2027/28.
- 2.11 These housing and traveller trajectories do not correspond for sites NWB.R1 and NWB.T1; Traveller pitches are proposed to be delivered between 3 and 5 years prior to housing deliveries. Site NWB.T1 will not realistically be delivered prior to



commencement of NWB.R1.

- 2.12 Delivery of sites NWB.R1 and NWB.T1 are both reliant on the production and endorsement of the same Strategic Masterplan. This process requires landowner collaboration, community and stakeholder engagement, Design Codes, Quality Review Panel input, EFDC endorsement, public consultation and potentially adoption as a Supplementary Planning Document.
- 2.13 The housing trajectory for site NWB.R1 takes account of the impact that this process will have on delivery timescales, hence no deliveries prior to 2022. However, the traveller trajectory for NWB.T1 does not allow for this process.
- 2.14 On the basis that policy P6 requires site NWB.T1 to be delivered through the NWB Strategic Masterplan on the same site as NWB.R1, the trajectories should correspond. The divergence means that the delivery timescales for NWB.T1 are unrealistic and not deliverable.
- 2.15 No justification is provided to explain why NWB.T1 is anticipated to deliver ahead of the NWB Strategic Masterplan, particularly in the context of sites within the other Strategic Masterplan Areas.
- 2.16 Sites comprising parts of the other Strategic Masterplan Areas (SP4.1, SP4.2, SP4.3 and WAL.T1) are not expected to deliver until between 2022 and 2032, either lagging behind or in tandem with the housing deliveries.
- 2.17 The inability for site NWB.T1 to deliver within the timescales contained in the trajectory will result in a failure to meet the need when it arises.
- 2.18 The trajectory states that the Local Plan requirement between 2017 and 2022 to be 33 pitches, with 34 allocated (which includes 16 extant permissions). This would result in a shortfall of provision of 4 pitches. Therefore, the Council will need to identify alternative sites to deliver the 2017-2022 need.
- 2.19 If site NWB.T1 is delivered in tandem with site NWB.R1 and the NWB Strategic Masterplan, deliveries would be later in the plan period when supply already exceeds the requirement.



2.20 Given the deliveries from site NWB.T1 are required within the first five years of the plan post adoption, this would be contrary to paragraph 10a) of the PPTS and paragraph 182 of the NPPF.

### **3.0 SUMMARY**

3.1 This hearing statement is submitted on behalf of Mr Martin Eldred and identifies concern regarding the clarity of policies relating to Gypsy & Traveller pitches and the ability of the proposed allocations to deliver the identified need within the timescales it arises. Specifically;

- Policy SP2 lacks clarity regarding need, unmet requirement and provision.
- Meeting this need within the required timescales is not achievable for site NWB.T1.