



# Phase 2

**EPPING FOREST DISTRICT COUNCIL:**

**Examination of the District Local Plan 2011 – 2033**

**Examination Statement:**

**MATTER 3: The Quantitative Requirements for Development**

On Behalf of

**Bloor Homes Ltd**

**January 2019**

**Our Ref: C16133**

**Phase 2** PLANNING & DEVELOPMENT LIMITED

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## **1. Introduction**

- 1.1 The following Examination Written Statement has been prepared on behalf of Bloor Homes Ltd, who has land interests to the north east of the settlement of Ongar (Site ref SR-0051), and has made representations to the Submission draft of the Local Plan, promoting the land for housing, possibly as a first phase of a wider development to achieve a bypass for the town and other benefits.
- 1.2 As requested, this Statement does not duplicate those representations, but addresses where relevant the issues raised by the Inspector in her Matters, Issues and Questions relating to Matter 3: The Quantitative Requirements for Development.
- 1.3 It will respond only to issue 1 of the questions raised by the Inspector, as follows. We have no comments on other issue raised.

### **Issue 1: Is the housing requirement for the plan period 2011-2033 appropriately defined having regard to the composition of the Housing Market Area (HMA); and the Objectively Assessed Need (OAN) for housing within the HMA?**

- 1.4 The Inspector has rightly raised the issue of the various figures for OAN appearing in various background documents, including the SHMA; whether or not the standard methodology set by the PPG has been followed; how neighbouring authorities have been taken into consideration, and whether the suggested non-discounted OAN within the SHMA has been tested via sustainability appraisal.
- 1.5 These are matters that we raised in our representations to the Pre-Submission draft of the Plan, where we also raised the matter of previous years' underperformance in meeting housing needs, within the context of the Frameworks emphasis on needing to boost the supply of housing, and the clear upward direction of travel of national policy in this respect.
- 1.6 The current strategy will mean that either the Council can artificially constrain or limit its Local Plan OR commit to an early review. However, each scenario renders the local Plan unsound through a failure to meet its OAN or the identification of Green Belt boundaries that require alteration at the next review. Both scenarios fail to address fundamental matters of sound planning practice.
- 1.7 This is important as a strategy that is artificially constrained, coupled with a reliance on large allocations where for example we have expressed concerns about delay/ deliverability/over reliance of Garden Towns, risks not delivering housing needs where they occur.

- 1.8 In terms of settlements such as Ongar, it is important to recognise that these can accommodate greater levels of growth, and that in reviewing Green Belt boundaries it is essential to establish boundaries that will endure.
- 1.9 The Inspector's questions in this regard cannot be clearly answered until the response from EFDC is received, and we may need to expand on these points in light of the Council's response.



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