

Carter Jonas

# **MATTER 3 HEARING STATEMENT**

**Epping Forest District Council Local Plan Examination**

**SUBMITTED ON BEHALF OF LONDON SQUARE DEVELOPMENTS**

January 2019

**Contents**

1 Introduction.....3

2 Matter 3 – The Quantitative Requirements for Development.....4

## 1 INTRODUCTION

- 1.1 This statement has been prepared on behalf of our client, London Square, who are the landowners of 'Front Site, Former Grange Farm, High Road, Chigwell' (Site 2).
- 1.2 Site 2 was acquired by London Square in January 2015 along with Site 1 which is located to the north east of Site 2 on Grange Farm Lane. Both Sites 1 and 2 originally formed part of 'Grange Farm' which was historically occupied for leisure and recreational uses as a camping ground. Grange Farm Centre is now located to the north of Site 2 providing recreational and sports facilities. Members resolved to grant planning permission for 43 residential units at Site 1 in November 2015 and permission was granted on 1 August 2016.
- 1.3 Site 2 has been promoted for release from the Green Belt for the purposes of residential development at every consultation opportunity associated with Epping Forest District Council's draft Local Plan. Whilst the site was identified as a suitable and deliverable housing site in the previous draft iterations of the Local Plan, it has been removed from the submission version of the plan without any prior notification or evidence to justify it.
- 1.4 As a result, London Square cannot support the Draft Local Plan and Carter Jonas will attend the hearing sessions most relevant to Site 2 on behalf of London Square's behalf
- 1.5 This statement outline's London Square's comments in respect of Matter 3.

## 2 MATTER 3 – THE QUANTITATIVE REQUIREMENTS FOR DEVELOPMENT

2.1 We respond to the specific issues arising in relation to Matter 3 below:

***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?***

***Question 4. Is it justified for the HMA as a whole, and for Epping Forest DC specifically, to plan for less than the OAN as established by the SHMA 2017, at 51,100 and 11,400 homes respectively?***

***Part a. Has the alternative of delivering the OAN been tested through Sustainability Appraisal? If not, is the SA process deficient?***

2.2 For the period 2011-2033, the Strategic Housing Market Assessment (SHMA) (July 2017) found the OAN for the HMA as a whole to be 51,710 additional homes. The OAN for Epping Forest was found to be 12,573 new homes, amounting to 572 per annum. These figures represent the most adequate, up-to-date and relevant assessment undertaken by the Council prior to the submission of the Local Plan.

2.3 The Submission Version Local Plan (December 2017) sets out the approach to housing across the HMA in Table 2.1 'Housing Distribution'. The table explains that a total of 51,100 net new homes will be planned for across the HMA within 2011-2033. In particular, within Epping Forest District Council a requirement of 11,400 net new dwellings has been set for within the same timeframe.

2.4 Therefore, the Submission Version of the Local Plan appears to set out an approach which includes a shortfall of 1,173 dwellings within the District and an overall shortfall of 600 homes in the HMA when compared with the 2017 SHMA. Clearly the shortfall is greater in Epping than in any other authority forming part of the HMA. A Memorandum of Understanding (MoU) has been signed that commits all four authorities within the HMA to meet their individual housing needs within their own administrative boundaries which further highlights the shortfall in Epping.

2.5 The Sustainability Appraisal (EB204) (December 2017) explains the background to the figures referenced in paragraph 2.3 above. The 'Co-operation for Sustainable Development Member Board' agreed to test three levels of growth:

- ~46,100 new homes in line with the 2015 SHMA;
- ~49,638 new homes in line with the (D)CLG 2012-based household projections; and
- ~57,400 new homes in line with early advice from ORS in light of more recent information including the CLG 2014-based household projections (NB this figure was later revised down to 54,608).

2.6 Six options were then considered to deliver the above levels of growth. Of the six options, only one option contained any variance on the level of growth delivered through the potential allocations/broad locations, with

all other variances relating to the number of units associated with the Harlow Fringe. Given the lack of variation in respect of testing delivery through potential allocations/broad locations, the Sustainability Appraisal's methodology is considered far from robust. The failure is such that the Sustainability Appraisal cannot be considered to have sufficiently complied with Regulation 12 of the SEA Regulations<sup>1</sup> and the requirement to identify and evaluate reasonable alternatives to implementing the Plan's objectives.

- 2.7 Were different spatial distribution options tested across the District, the assessment may well have concluded that the Plan would be able to deliver a higher quantum of housing in a sustainable way.
- 2.8 Paragraph 6.18 of the Sustainability Appraisal recognises the fact that the Plan does not reflect the most up to date, available housing projections; and that the figure is based on the CLG 2012-based household projections rather than the CLG 2014-based household projections:

*“At c. 51,000 new homes, the planned level of housing growth is higher than both the established OAHN within the published 2015 SHMA (46,100) and the figure based on the CLG 2012-based household projections (49,638). It is lower than ORS’ estimated OAHN figure taking into account recent information including the CLG 2014-based household projections (54,608) but nonetheless represents good progress towards this higher figure. Overall, the figure of c. 51,000 indicates that the four HMA authorities are positively seeking opportunities to meet the development needs of their areas in line with the National Planning Policy Framework (NPPF), and, furthermore, significantly boosting the supply of housing (NPPF, para. 47)”.* (Emphasis added).

- 2.9 In respect of the 2017 SHMA identifying a higher OAN, the Sustainability Appraisal goes on to note at paragraph 7.6 that:

*“Higher numbers including figures approximating to and in excess of 51,710 new dwellings had already been tested and so there was no need to revisit the HMA-level optioneering work”.*

Whilst a higher figure had been tested, this was a much larger number of 57,400 homes. This is clearly not a relatively comparable figure to the 2017 SHMA's requirement for 51,100 dwellings and as such, we do not consider that a robust assessment of the most up to date OAN was undertaken.

- 2.10 We therefore conclude, that there is no justification for the HMA as a whole and for Epping Forest DC specifically to plan for less than the OAN established in the SHMA 2017 as a robust reasoning for using the 2012 based household projections instead of the later 2014 household projections has not been demonstrated.
- 2.11 Furthermore, the alternative for delivering the OAN as set out in the 2017 SHMA has not been tested in the Sustainability Appraisal. The earlier 2016 Sustainability Appraisal considers the delivery of a much greater

---

<sup>1</sup> The Environmental Assessment of Plans and Programmes Regulations 2004

number of new homes (57,400) but this is not considered comparable to the OAN of 51,700 and is of course much more likely to result in sustainability concerns; hence why it was disregarded.

- 2.12 Overall, it is concluded that the Plan does not meet the tests of soundness as it has not been positively prepared with a clear and robust methodology. It fails to meet the OAN for the District which systematically results in a failure to meet the OAN of the HMA. Furthermore, the Sustainability Appraisal fails to meet the legal requirements set out in the Environmental Assessment of Plans and Programmes Regulations 2004 which requires Local Plans to suitably assess the reasonable alternatives for meeting the OAN of the District.