

Epping Forest District Council Local Plan Examination

**Clare Hutchinson on Behalf of
Mr. Graeme Watt
(19LAD0024)**

**Hearing Statement
Matter 5: Site Selection
Methodology and the
Viability of Site Allocations**



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1.0 INTRODUCTION

- 1.1 This hearing statement is on behalf of Mr Graeme Watt, owner of omission sites SR-0313-A1, SR-0313-B1 and SR-0313-C1, situated adjacent to the eastern development boundary of Lower Sheering and adjoining allocated site LSHR.R1.
- 1.2 I confirm I am making written representations only to matter 5 and am not seeking attendance at the hearing session itself.

2.0 ISSUE 1: HAVE THE PLAN'S HOUSING ALLOCATIONS BEEN CHOSEN ON THE BASIS OF A ROBUST ASSESSMENT PROCESS?

- 2.1 In regard to **Question 2**, we contend that the conclusions reached regarding individual sites within the 2018 Site Selection Report (EB805) are not robust or justified. Our full reasoning in this regard is set out within our original representations provided at the regulation 19 stage and in response to the separate consultation on the appendices to the 2018 Site Selection Report published in March 2018.
- 2.2 We note that the Council is adopting a stepped housing trajectory (Housing Implementation Strategy Update, 'HISU' - EB410A). and we have commented in further detail regarding this approach in our hearing statement for Matter 6. Part of the Council's justification for this approach is that they do not consider it feasible to identify additional new sites (HISU, paragraphs 4.10 to 4.13), because, "*...given the quantum of new allocations needed, the Council would have to undertake a substantial amount of further technical assessments and consultation to test potential impacts (individually and collectively) of these new sites on local infrastructure, environment and the communities. Such an approach would clearly result in significant delays in the adoption of the Local Plan, which will in turn delay both short-term and long-term housing delivery.*"
- 2.3 We contend that the quantum of new allocations needed to fully meet need in the early years of the Plan is not a justifiable reason to make no attempt at all to consider whether there are additional, small scale sites (or extensions of existing allocated sites), which could be delivered in the first five years of the Plan period without significant potential



individual and cumulative impacts. Whilst these additional allocations may not fully meet the shortfall, they would contribute to reducing it and ensure the Plan better reflects the requirement at paragraph 47 of the 2012 NPPF to ‘boost significantly’ the supply of housing. Whilst a stepped approach might be considered sound this should only be if the Local Plan has exhausted the supply of deliverable sites. We contend that there are further suitable, available and achievable sites that have been unjustifiably eliminated from consideration for allocation by the 2018 Site Selection Report as a result of a lack of robust assessment.

- 2.4 Within our regulation 19 representations we supported the proposed allocation of site LSHR.R1 within Lower Sheering, but outlined that there is additional deliverable land available within adjoining omission site SR-0313. LSHR.R1 and SR-0313 are within the ownership of the same family and a joint approach to developing the sites could be undertaken.
- 2.5 Our regulation 19 representations, and supplementary representations to the 2018 Appendices of the Site Selection report of March 2018, set out the reasons why we consider the site selection process is unjustified in rejecting SR-0313. In summary, we do not consider that the rejection of the site on the basis of the findings of the Settlement Edge Landscape Sensitivity Study (EB712) and Green Belt Assessment (EB705) is robust, with the key issue being the fact that both these studies were not undertaken at a site scale but instead at a larger, parcel scale. Within the 2018 Site Selection Report, sites were considered to have the same impact in Green Belt and Landscape terms as the wider parcels of which they form only a small part. This theoretical and desk top approach means an accurate assessment of the relative impact of developing individual sites has not been undertaken and as such the 2018 Site Selection Report does not reach justified conclusions, with sites rejected without due consideration.
- 2.6 As a result, the Council’s approach in regard to ensuring a five-year supply of deliverable sites is unsound as reasonable alternatives exist to improve the Plan’s ability to meet the acute levels of housing need in the early years of the Plan. These reasonable alternatives have been rejected erroneously due to a lack of robustness in the



assessment of sites through the site selection process.