

Epping Forest District Council Local Plan Examination

**Clare Hutchinson on Behalf of
Mrs Bridget Uncle
(19LAD0030)**

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



CONTENTS

1.0 INTRODUCTION3

2.0 ISSUE 1: HAVE THE PLAN’S HOUSING ALLOCATIONS BEEN CHOSEN ON THE BASIS OF A ROBUST ASSESSMENT PROCESS?3



1.0 INTRODUCTION

- 1.1 This hearing statement is on behalf of Mrs Bridget Uncle, owner of allocated sites SHR.R1 and SHR.R3 in the village of Sheering.
- 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 1**, We support the overall methodology adopted by the Council in regard to the site selection for housing allocations and believe the sites proposed for allocation, in particular sites SHR.R1 and SHR.R3 are sound as they stand.
- 2.2 However, in the case of allocated site SHR.R1 adjustments to the boundaries of the site made during the preparation of the 2018 Site Selection Report (EB805 and associated appendices) to make the site smaller than previously allocated at the regulation 18 stage/recommended in the 2016 Site Selection Report (EB801), are not justified by the Site Selection Methodology, and are unsound in light of the circumstances that the Council find themselves in in terms of an inability to meet housing need in the first five years of the Plan.
- 2.3 The Council is adopting a stepped housing trajectory (Housing Implementation Strategy Update, 'HISU' - EB410A). Part of the justification for this approach is that the Council do not consider it feasible to identify additional new sites (HISU, paragraphs 4.10 to 4.13), arguing that, *"...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...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."*
- 2.4 Whilst we accept that meeting full need in the first five years could be challenging, and a stepped trajectory or adoption of the Liverpool method might still be required, we do not consider this justifies making no attempt to ameliorate the shortfall where there are



sites could be allocated/expanded without further technical assessment, consultation and testing.

- 2.5 For the reasons set out in response to Question 3 below, we consider the sound approach would be to allocate the site boundaries for SHR.R1 as shown at the regulation 18 stage, which would increase the site capacity from 10 dwellings to 16 dwellings. Whilst this is a modest increase in housing numbers, any contribution to meeting housing need in the first five years of the Plan should be taken by the Council given the circumstances.
- 2.6 We do not consider that making this amendment will give rise to any of the issues identified at paragraphs 4.10 to 4.13 of the HISU. The larger site allocation was consulted on at regulation 18 stage and the modest increase does not require further technical assessment of impacts. Such an amendment would be easily dealt with at the modifications stage.
- 2.7 In regard to **Question 3**, The 2016 regulation 18 draft Plan and the 2016 Site Selection Report (EB800) proposed the allocation of a larger site than is currently comprised by SHR.R1, with the inclusion of a linked parcel of land to the north west of that land allocated within the submission Plan. This is illustrated by the proposals map extracts reproduced below.



Allocation as Proposed in the Draft Plan



Allocation as Previously Proposed in the 2016 Regulation 18 Draft Plan

- 2.8 Paragraph 2.137 of the 2018 Site Selection Report (EB805) states, *“The site allocations proposed for inclusion in the Local Plan Submission Version are broadly consistent with those contained in the Draft Local Plan. Amendments to the Draft Local Plan site allocations were made in the following settlements for the reasons set out below. If a settlement is not listed below the site allocations remain as proposed in the Draft Local Plan.”* Sheering is not however listed, despite the extent of SHR.R1 changing between the regulation 18 draft Plan and the submission draft Plan.
- 2.9 It was not possible at the regulation 19 consultation stage to fully explore the reasons why the site had been made smaller as the appendices to the 2018 Site Selection Report had not been published at that point. However, in our response to the consultation on the Site Selection Report Appendices B and C, held during Spring 2018, we highlighted that it was clear that this reduction in the size of the site was not fully justified.
- 2.10 Appendix B1.6.4 of the 2018 Site Selection Report (EB805N), concerns ‘Results of Capacity and Deliverability Testing’. The relevant page for SR-0033 (the reference number given to site SHR.R1 in the Site Selection Report) states under ‘further boundary amendment’, that, *“Development should be limited to the southern part of the site fronting Sheering Road which is 0.41 hectares, equating to 67% of the site area.”* No justification is given for this amendment.
- 2.11 Appendix B1.6.6 of the 2018 Site Selection Report (EB805P) which concerns the results



of identifying sites for allocation, states, *“This site was identified as available within the first five years of the Plan period. Although there is no evidence of it having been marketed, it has no identified constraints or restrictions which would prevent it coming forward for development. It was considered that the irregular configuration of the site proposed for allocation in the Draft Local Plan (2016) may impact upon its deliverability thus, it is proposed that development is limited to the southern portion of the site. This area is proposed for allocation.”*

- 2.12 No reasons are provided as to why the shape of the site could affect deliverability. Appendix B1.4.2 of the 2018 Site Selection Report (EB805Fi) which contains site suitability assessments, raises no concerns regarding the configuration of the site.
- 2.13 Adequate access can be achieved between both parts of the site to adoptable highways standards. Notwithstanding this, the Council is aware from information submitted on behalf of the landowner at previous stages of the Local plan process (2008 Call for Sites, 2012 Community Choices Consultation, 2016 Site Survey) that the land to the north and east of SR-0033 is within the ownership of the same landowner. We do not consider additional land is required to deliver the site, however if the Council have concerns to the contrary there is flexibility in the site boundaries.