

**Epping Forest District
Council
Examination**

**Hearing Statement
Matter 6**

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

**Sworders
February 2019**



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1.0 INTRODUCTION

- 1.1 This hearing statement considers Matter 6 – Housing Supply and the 5-Year Supply, specifically, Issue 3.
- 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 considers the Inspector’s Matters, Issues and Questions in relation to Week 3 Matter 6 of the Epping Forest Local Plan Examination
- 1.4 **I confirm I wish to attend the hearing.**

2.0 ISSUE 2: WILL THE PLAN ENSURE THAT THERE IS A REASONABLE PROSPECT OF A FIVE-YEAR SUPPLY BEING ACHIEVED UPON ADOPTION AND THROUGHOUT THE LIFETIME OF THE PLAN AS REQUIRED BY PARAGRAPH 47 OF THE NPPF?

- 2.1 In response to **Question 2b)**, we consider it reasonable to expect deliveries from sites within Strategic Masterplan Areas in the first five years post adoption.
- 2.2 The Council acknowledge, in the Housing Implementation Strategy Update: Discussion Paper (December 2018), that the requirement to prepare a Strategic Masterplan could have an impact on delivery timescales. However, to address this the Council is working closely with partners to facilitate timely (and where possible accelerated) delivery of allocations that form part of identified Masterplan Areas and Concept Framework Areas which will contribute significantly to housing supply in the middle to long term.
- 2.3 Specifically in the case of site NWB.R1, this forms part of the North Weald Basset (NWB) Masterplan Area where the landowners consultant team has been working pro-actively and collaboratively with the Council, Neighbourhood Plan Steering Group and other landowners and undertaken a significant amount of background studies to establish the baseline and begin the masterplan process for the combined sites. Therefore, the Masterplan Area will be in a good position to start delivering after adoption of the LPSV.



- 2.4 The LPSV housing trajectory at appendix 5 includes deliveries from the NWB Masterplan Area in years four and five post adoption.
- 2.5 This has been updated by the Housing Implementation Strategy Update which assumes longer lead-in times for larger allocations. This includes the first deliveries from the NWB Masterplan Area in 2022/23, year five post adoption.
- 2.6 Whilst this is a realistic assumption, site NWB.R1 could be delivered quicker.
- 2.7 The Housing Implementation Strategy Update is clear that in some cases, smaller parcels could be delivered within the Masterplan areas ahead of the larger parcels, if they are in compliance with it and will not prejudice future development across the whole Masterplan area.
- 2.8 Site NWB.R1 is of a scale and position which could come forward as a full application, separate from the other sites within the NWB Masterplan Area. It benefits from existing accesses and road frontage and is of sufficient size to be a standalone scheme, whilst still contributing to the objectives of the Strategic Masterplan.

3.0 ISSUE 3: DOES THE PLAN MEET THE REQUIREMENTS OF PARAGRAPH 10 OF THE PLANNING POLICY FOR TRAVELLER SITES (PPTS) IN RESPECT OF DELIVERY?

- 3.1 In response to **Question 1**, we consider that the plan is not consistent with paragraph 10 part a) of the PPTS. The LPSV is not clear what the five-year requirement for the delivery of Traveller sites is, nor whether this be achieved upon adoption.
- 3.2 Paragraph 10 part a) states that, in producing their Local Plan, local planning authorities should identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against their locally set targets.
- 3.3 The LPSV appears not to identify an annual or five-year requirement.
- 3.4 As set out in our statement in response to Matter 3 Issue 2, the LPSV lacks clarity regarding the identified need for Gypsy & Traveller pitches over the plan period, but understand this is to be clarified through an amendment to the policy wording.



- 3.5 With regard to the five year requirement, Appendix 5 of the LPSV contains trajectories for housing, employment and traveller sites and does break down the Local Plan requirement into distinct five-year periods.
- 3.6 However, the trajectory for Traveller provision does not specifically set out an annual or five-year requirement. It shows the bulk of deliveries in the early years of the plan period, between 2017 and 2022 and a seemingly corresponding requirement. However, it is not clear from the LPSV or evidence base, how the requirement has been identified or how this would relate to a rolling five-year requirement.
- 3.7 As set out in our response to Matter 3 Issue 2, the timing of the deliveries shown in the Appendix 5 trajectory for Traveller provision and do not correspond to the trajectory for housing deliveries made through the same allocations.
- 3.8 Specifically, Policy P6 requires both sites NWB.R1 and NWB.T1 to be delivered through the NWB Strategic Masterplan on the same site. However, the trajectories do not correspond; the Traveller pitches are proposed to be delivered between 3 and 5 years prior to housing deliveries and ahead of the NWB Masterplan which is clearly not deliverable.
- 3.9 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.
- 3.10 Site NWB.T1 will not contribute to the first five years of the plan post adoption, meaning a likely shortfall in the first five years. This would be contrary to paragraph 10a) of the PPTS and paragraph 182 of the NPPF.

4.0 SUMMARY

- 4.1 This hearing statement is submitted on behalf of Mr Martin Eldred, who supports the allocation of site NWB.R1 and considers it possible to deliver homes from this site in the first five-years following adoption. However, site NWB.T1 will not deliver within the first five years of the plan period. Specifically;
- The LPSV lacks clarity and fails to identify an annual or five-year requirement for Gypsy & Traveller sites in accordance with the PPTS.



- Even if this need is identified, site NWB.T1 will not deliver within the first five years of the plan period, so will not contribute to an element of this need.