

Carter Jonas

HEARING STATEMENT

Epping Forest District Council Local Plan Examination

SUBMITTED ON BEHALF OF COUNTRYSIDE PROPERTIES

February 2019

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1 INTRODUCTION

- 1.1 This statement has been prepared on behalf of our client, Countryside Properties, in relation to the land to the south-east of Chipping Ongar Road in Fyfield ('the Site').
- 1.2 The Site covers an area of approximately 2.65ha and is currently in use as an agricultural field. To the north, the site adjoins the existing residential area of Fyfield; to the east of the site lies the Fyfield Village Hall and Sports and Leisure Club. The Site lies adjacent to the heart of the settlement. Countryside have already carried out a technical review of the Site (see **Appendix 1**) as well as some initial masterplanning work (see **Appendix 2**).
- 1.3 The Site has been promoted for release from the Green Belt for the purposes of residential development at previous consultation opportunities associated with Epping Forest District Council's Draft Local Plan (DLP). The Site was identified as a suitable and deliverable housing site in the previous draft iterations of the Local Plan, however despite this and its ability to provide early delivery of much needed housing for the village of Fyfield as well as the wider District itself, 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, Countryside Properties cannot support the DLP and Carter Jonas will attend the hearing sessions most relevant to the Site on behalf of Countryside Properties.
- 1.5 This statement reiterates and emphasises the matters raised by Countryside Properties in representations to the DLP and provides comments in respect of Matters 5 and 6.

2 MATTER 5 – SITE SELECTION METHODOLOGY AND THE VIABILITY OF SITE ALLOCATIONS

2.1 We respond to the specific issues arising in relation to Matter 5 below:

Issue 1: Have the Plan's housing allocations been chosen on the basis of a robust assessment process?

Question 3: As raised in Matter 1, Issue 2, some sites which were proposed for allocation in the Regulation 18 version of the Plan are not proposed in the Regulation 19/submitted version and vice versa? Is this due to changes in the site selection process, or something else? Are the different conclusions reached about the relevant sites fully explained and justified?

- 2.2 Given that the site was put forward for consideration in the original call for sites (i.e. prior to 31 March 2016), it is assumed that it is considered a 'Tranche 1' site as defined in EFDC's Site Selection Report.
- 2.3 When the Regulation 18 version of the DLP was issued for consultation in October 2016, the document proposed the removal of the site (SR-0049) from the Green Belt and an allocation for approximately 85 homes.
- 2.4 Between the submission of representations to the Regulation 18 version of the DLP in October 2016 and the publication of the Regulation 19 version of the DLP at the end of 2017, Carter Jonas attended three 'Developer Forum' meetings at EFDC's offices in December 2016, February 2017, and May 2017 on behalf of various landowners. No reference was made at these meetings to changing the site selection process for draft allocations. When the Regulation 19 version was published in December 2017, it was completely silent on sites which had been proposed for allocation at the Regulation 18 stage but which were then removed. Therefore, there was no reference to SR-0049 at all. Furthermore, when Appendix B was published in March 2018, B1.4.2 (Results of Stage 2) the Site Suitability Assessments do not refer to any change in circumstances between Stages 1 and 2.
- 2.5 EFDC's Results of Stage 1 (EB801E) (extract containing SR-0049 attached at **Appendix 3**) dated September 2016 show that the site is not constrained by any of the listed criteria and that it should proceed to the next stage.
- 2.6 Also dated September 2016, the Results of the Stage 2 Report (EB901Gii Appendix B1.4.2 attached at **Appendix 4**) shows that where the site was considered to score poorly against various criteria (agricultural land and landscape), it was considered that these issues could be overcome. This is evident in document EB801M B1.6.5 'Decisions on Residential Sites for Allocation in Fyfield' (extract included at **Appendix 5**). The assessment of insurmountable constraints notes "*on-site restrictions have been identified, but it was judged that these could be overcome, and it was not felt that identified deficiencies in secondary school places would adversely affect the achievability of the site*". The site is proposed for allocation with the justification stating "*This site was identified as available within the next five years. It has been marketed and has no identified*

constraints or restrictions which would prevent it coming forward for development. The site should be allocated". The site therefore continued to proceed to Stage 3.

- 2.7 In January 2018, Countryside Properties submitted representations to the Council to object to the removal of the site from the allocations in the submission version of the Local Plan. The site also appeared to remain within the Green Belt (whereas it had been removed from the Green Belt in the earlier Issues and Options version). Concern was expressed regarding the process undertaken to confirm allocations as part of the Site Selection Assessment in relation to Appendix B. Appendices B and C were not available at the time of the publication of the Site Selection Report in December 2017. When the appendices were released in March 2018 Appendix B1.4.2 'Results of Stage 2' and Appendix B1.6.4 'Results of Capacity and Delivery Assessments' were both dated March 2018. This would imply that Stages 2 and 3 were both undertaken retrospectively i.e. after the publication date of the Site Selection Report in December 2017 which presents the results. Whether this is an anomaly, or an ex-post facto justification for a decision taken contrary to the evidence base is unclear.
- 2.8 At Stage 3 of the assessment (extract included at **Appendix 6**), the site was purported to score poorly in terms of landscape impact but, given it is partially wrapped around by existing development, it was considered that this constraint could be overcome. At Stage 4 of the assessment (extract included at **Appendix 7**), deficiencies in primary and secondary school places and GP surgeries were identified but it was considered that these would not adversely affect the achievability of the site. The updated indicative net site capacity at this stage was 82 units with a -10% local setting density adjustment.
- 2.9 Despite this, Document B1.6.6 'Results of Identifying Sites for Allocation' (extract included at **Appendix 8**) states that the site is *"not proposed for allocation"*. *This document explains that "while it was identified as available within the first five years of the Plan period and has no identified constraints or restrictions which would prevent it coming forward for development, on balance it was considered that an alternative site in Fyfield through Stage 6.4 (SR-0935) was more suitable and would provide for a scale of growth that is more appropriate to the settlement"*.
- 2.10 We would conclude that the conclusion reached in respect of site SR-0049 is neither adequately explained nor appropriately justified; the site's circumstances and characteristics did not alter between Stage 4 and the 'Results of Identifying Sites for Allocation' yet entirely different conclusions appear to have been reached. We do not consider there to be sufficient evidence to justify the allocation of the alternative site in Fyfield over our client's site. The site remains suitable, available and deliverable, and we were not made aware of any objections to the proposed allocation of the site in the DLP carrying sufficient weight to warrant its removal from the submission version. This further demonstrates that consultation responses have not been addressed in the Submission Version Local Plan.
- 2.11 Moreover, the decision to allocate a small site in Fyfield that will fail to deliver affordable housing will rob the local community of the social and economic benefits that would be realised through the allocation of SR-0049.

3 MATTER 6: HOUSING SUPPLY, INCLUDING SOURCES OF SUPPLY; THE HOUSING TRAJECTORY; AND THE FIVE YEAR SUPPLY

3.1 We respond to the specific issues arising in relation to Matter 6 below:

Issue 1: Will the Plan provide a land supply sufficient to deliver the housing requirement of at least 11,400 dwellings over the Plan period?

Question 1. Table 2.3 on page 29 sets out the different components of the housing land supply for the period 2011-2033. Is data on housing completions and extant planning permissions now available up to 31 March 2018? If so, should the table be updated to reflect this? Should the table indicate how much housing is expected to be provided through allocations outside the Garden Communities? Should it be made clear whether the total housing supply for the Plan period will be above or below the requirement?

3.2 Table 2.3 'Housing Land Supply: 2011-2033' of the Submission Version Local Plan explains that 1,330 homes were built between 2011 and 2017. The Authority Monitoring Report (AMR) for 2017/2018 is now available to view on the Council's website. The report explains that 526 net new homes have been completed across the District in the period, and this includes 89 net new affordable homes. If Table 2.3 was updated to include the housing completion data from 2017/2018, the number of dwellings completed since the start of the Local Plan period (i.e. 2011) would total 1,856.

3.3 We remain concerned with the accuracy of the housing completions data shown in Table 2.3 as there appears to be a discrepancy in the total number of dwellings completed stated in the AMR as compared with our calculations using Table 2.3 given that the AMR states "*the total number of dwellings completed since the start of the Local Plan period (2011) is 1,897*"¹.

3.4 Nonetheless, we believe that the Table 2.3 should be updated to reflect the latest data available in order to accurately understand the housing requirement in the District.

3.5 Whilst Table 2.3 sets out the housing requirement to be met through Garden Town Communities around Harlow within EFDC and elsewhere in the District, the table does not indicate how much housing is expected to be provided through allocations. Whilst the housing allocation figures for each settlement is set out within Policy SP2, we believe that this should be indicated within Table 2.3. This would then make it clear to the reader that the purported total housing supply for the Plan period (13,152 dwellings) will be above the requirement (11,400 dwellings).

Question 2. Policy SP2(c) indicates that additional housing could be delivered through Neighbourhood Plans and on rural exception sites in accordance with

¹ Authority Monitoring Report 2017/2018 p.23.

Policy H3. Is it possible to quantify this contribution and should it be reflected in Table 2.3?

- 3.6 Whilst we consider it possible to quantify the contribution of additional housing through made Neighbourhood Plans, we consider that the contribution of housing from rural exception sites is likely to be negligible. The Housing Trajectory as set out at Appendix 5 of the Local Plan expects 41 dwellings to be provided through 'other rural sites'. We are unable to accept that the Council has adduced sufficient evidence to justify the rural exception site allocations. We therefore do not believe that rural exception sites should be reflected within Table 2.3. The inclusion of variable and un-evidenced sources of supply does not provide confidence in the outputs.
- 3.7 Regardless of whether it is possible to quantify the contribution of rural exception sites, we do not consider there to be a need for such provision within the housing supply. In line with Policy H3 'Rural Exceptions' of the Submission Version Local Plan, planning permission for rural exception sites may be granted, where the Council *"is satisfied that there is demonstrable social and economic need for affordable housing for local residents which cannot be met in any other way"* (own emphasis). Given that these 41 dwellings could instead be allocated for residential development in the Local Plan, we do not consider that there is a need for this contribution from rural exception sites. Put simply it would be far better to plan positively for this housing and treat any rural exceptions as wholly exceptional as intended, rather than placing any reliance on them.

Question 3. Is the expected windfall allowance of 35 dwellings per annum for 11 years (385 in total) justified? Representations suggest that the figure might either be higher or lower.

- 3.8 As set out at Paragraph 48 of the NPPF *"Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens."* (own emphasis).
- 3.9 The Housing Implementation Strategy Update (2019) explains that according to the Council's monitoring data, all of the housing allocations in the current adopted Local Plan (1998) had been realised by 2006, therefore it can be argued that all new homes completed since 2006 (an average of 242 new dwellings per annum) could be viewed as windfall development. This document states that the Council does not expect the rate of windfall delivery to continue at this rate following the adoption of the Local Plan, however no evidence to support this statement is provided. We therefore do not consider the expected windfall allowance of 35 dwellings per annum for 11 years to be justified.
- 3.10 Rather, we would urge the Council to further minimise the windfall allowance, and instead introduce the expected 385 dwellings as housing allocations within the Local Plan. We believe this will assist the Council in protecting open space and residential character including stopping unwanted and unsustainable 'garden grabbing'.

- 3.11 It would be incorrect and improper to conflate the level of delivery from the tail end of a Plan adopted over 20 years ago with windfall supply. If the correct DLP is positively prepared, soundly based and adequate evidence is produced to support it then the level of windfall supply should be minimised.

Question 4. In determining the contribution of allocated sites to the housing land supply, how have sites densities been worked out? Is there any general risk that the capacity of sites has been overestimated?

- 3.12 The current estimated site capacities in the Local Plan were based on information collected through the Council's site selection process which comprises a gross density whilst taking account of identified opportunities and constraints, local character and the best use of land. For larger sites in particular, there is a concern that using gross density may result in the capacity of the site being overstated once the need for internal roads and other infrastructure is taken into account. There is therefore a general risk that the capacity of sites has been overestimated, and we would therefore urge the Council to consider the allocation of additional sites and/or the safeguarding of suitable and deliverable sites in sustainable settlements to assist in ensuring the delivery of the housing requirement over the Plan period as a whole.

Issue 2: Will the Plan ensure that there is a reasonable prospect of a five-year land supply being achieved upon adoption and throughout the lifetime of the Plan as required by paragraph 47 of the NPPF?

Question 1. What is the five-year supply requirement upon adoption of the Plan having particular regard to the following:

- a. ***With a requirement to provide 11,400 dwellings over the 22 year Plan period 2011-33, the annualised housing requirement would be 518 dwellings. What is the shortfall in delivery since the start of the Plan period (up to 31 March 2018 if appropriate); and how and over what period is it intended to make up for this? Is it justified not to seek to recover the shortfall within the first five-year period after the Plan is adopted?***
- 3.13 Given that requirement to provide 11,400 dwellings over the 22-year plan period 2011-33, the Council would have been required to provide 3,626 between 2011 and 2018. There is however a shortfall in delivery of 1,770 homes since the start of the Plan period.
- 3.14 The Council's 'policy-on' five-year housing land supply position based on the Local Plan Submission Version allocations and utilising the methodology set out in the Housing Implementation Strategy can be therefore be calculated as follows: $2,776 \text{ (Total supply)} / 3,340 \text{ (Five-year housing requirement)} \times 5 = 4.2 \text{ years}$.
- 3.15 This calculation seeks to utilise the application of the 'Liverpool Approach' in apply backlog to the entirety of the remainder of the Plan period, applying a 5% buffer to "ensure choice and competition".
- 3.16 In order for the Council to meet its own five year housing land supply requirement of 3,440 new homes, a minimum of 662 new homes will need to be identified in addition to the 2,776 new homes that have already

been identified. The Council has considered it necessary to propose a stepped requirement to housing delivery:

- Step 1: Previous Years (2011/12 – 2017/18) – the housing requirement for this period has been set at a level that reflects the actual delivery rate during the same period i.e. 265 per annum;
- Step 2: Years 1 to 5 (2018/19 – 2022/23) – the housing target for the five-year period is set at 425 new homes per annum;
- Step 3: Years 6 to 15 (2023/24 – 2032/33) – to meet the overall Local Plan housing requirement of 11,400 new homes, the Council will need to deliver 742 new homes per annum during the last 10 years of the Plan period.

3.17 These approaches² would be unjustified if applied in isolation. However, in seeking to apply them together the Council is significantly risking future affordability in the District and flying in the face of Governments policy to deliver 300,000 homes by the mid-2020s. It has already been raised to the Examination the acute affordability crisis facing residents locally. The District ranks as the 3rd least affordable local authority outside London when applying lower quartile house prices to work place earnings.

3.18 The need to address this crisis immediately is exemplified by the worsening of the situation since the start of the plan period, rising by over 50% from 10.6 in 2011 to 16.08 in 2017. This factor compares to a ratio nationally of 7.3, which has been stable for around 10 years.

3.19 As set out in Paragraph 3-035-20140306 of Planning Practice Guidance, the plan should “...*aim to deal with any undersupply within the first 5 years of the plan period where possible*”. This has not been recognised by the Council as the stepped approach and Liverpool approach would not address the housing needs of the previous 7 years until much later in the plan period. This situation will mean that affordability is likely to worsen, and household formation will continue to be suppressed.

3.20 The Inspector at the recent examination of the Guildford Local Plan raised concerns regarding the use of stepped trajectories and the Liverpool methodology where there is a significant undersupply:

“...the submitted plan’s level of delivery in the early years, based on a stepped trajectory combined with the Liverpool methodology, is not acceptable. It would negate the purpose of the 20% buffer (which the Council accept), frustrate attempts to address key factors affecting worsening affordability, and would be contrary to Government policy which is seeking to boost the supply of housing”.

The inspector concluded that “...*the Council should not accept a stepped trajectory, but should identify additional sources of housing delivery in the early years of the Plan*”. We contend that the position of Guildford is comparable to EFDC and therefore the Council must do more to address the undersupply.

² A stepped trajectory and applying the Liverpool Approach.

- 3.21 The utilising of the Liverpool Approach has been justified by local authorities elsewhere in the country. However, in these scenarios there has typically been a specific mitigating factor, such as the delivery of a significant piece of infrastructure to unlock housing delivery. In Guildford for example, the Council was reliant on the delivery of significant upgrades to the A3 by Highways England in order to unlock the delivery of the vast majority of growth in the Borough, this is not the case with EFDC.
- 3.22 There are a wealth of sites available to the Council that are eminently deliverable within the first five years of the Plan. The claim of the Council earlier in the Examination that because these sites are currently designated as Green Belt then they would not be able to be delivered early in the plan period is unfounded. A number of these sites, including that at Chipping Ongar Road, Fyfield, is under control of reputable developers, have been subject to extensive technical work, and could be progressed to application in the first instance.
- 3.23 As we understand from the Examination of earlier matters in the EiP, the Council agreed to modify the objectives of the plan to state that the plan will meet the OAN. We have taken this to mean that Policy SP2 will be amended to refer to the delivery of 12,573 dwellings (as taken from SHMA (2017)) rather than the 11,400 figure as included in the submission version of the plan. Running a calculation of previous under delivery against the Council's accepted OAN figure and annualised over the plan period, this shortfall increases to 2,145 dwellings.
- 3.24 If the Council were to correctly apply this shortly under the Sedgefield approach, alongside a 20% buffer in accordance with paragraph 47 of the NPPF, the proposed five year supply can be calculated as follows: $2,776$ (Total supply) / $6,000$ (Five-year housing requirement) x $5 = 2.31$ years
- 3.25 As such our concerns with the stepped approach are heightened, and we consider it imperative for the Council to consider an alternative approach to assist in meeting the increased housing requirement.
- 3.26 An alternative strategy to assist in meeting the five year housing land supply requirement would be to attempt to increase short term housing supply through further allocations. Whilst the Council have considered a version of this strategy, it was decided that *"this option would require a significant amount of new evidence and public consultation to be carried out to justify the quantum and location of any proposed new allocations"*³. We do not believe that the Council would have to undertake a substantial amount of further technical assessments and consultation since a pool of housing sites is available from previous rounds of consultation that could be considered.
- 3.27 Our client's site is one such example; the site was identified for allocation within the Epping Forest DLP (2016) for approximately 85 homes. Its identification was justified by evidence such as Site Selection (Sept 2016), the SLAA, and the GB Review. The Site however was removed from the submission version of the Local Plan without any prior notification or evidence to justify it. We suggest the Site to be deliverable (under both footnote

³ P.25 of Housing Implementation Strategy Update (2019)

11 of the NPPF and under the definition set out in the NPPF (2018)) given that it is available now, offers a suitable location for development now, and is achievable with a realistic prospect that housing could be delivered on the site within five years. We contend that the Site should be identified for housing development within the Local Plan for up to 85 residential units, or at the very least, should be removed from the Green Belt, for the following reasons:

- The Site contributes positively to the settlement of Fyfield;
- The scale of growth in Fyfield is not consistent with other comparable settlements in the District;
- The Site would enable the delivery of much needed affordable housing in Fyfield; and
- The Site would help to sustain local services and businesses by increasing the customer base and viability of the local services.

3.28 As such, we do not believe that it is justified not to seek to recover the shortfall within the first five-year period after the Local Plan is adopted. We contend that an attempt to increase short term housing supply through further allocations would be a more appropriate, realistic and achievable strategy in meeting the five year housing land supply requirement in the District as compared with the stepped requirement approach.

Question 2. On the basis of the answer to Question 1, will there be a five-year housing land supply upon adoption of the Plan? What evidence is there to support this? Can the Council produce a spreadsheet to show how individual sites are expected to contribute to delivery in each year? In particular:

a. If the Plan is not adopted until mid-late 2019, is it realistic to expect allocated sites to start delivering in 2018/19 and 2019/20?

b. Is it realistic to rely upon sites requiring the adoption of a Strategic Masterplan, including the Garden Town Sites, for the five year supply?

3.29 We do not believe that the Council will have a five-year housing land supply upon adoption of the Plan should it be calculated in line with the NPPF which requires undersupply to be addressed within five years of plan adoption. As has been demonstrated above, were the Council to apply a sound methodology, their actual five year supply would be as low as 2.31 years. This is before strategic site allocations are scrutinised for their ability to come forward within the first five years of the Plan.

3.30 It would be difficult for the Council to produce a spreadsheet demonstrating how individual sites can contribute to delivery in each year given the challenges in the delivery of strategic allocations. We suggest the Council should consider the allocation of additional smaller sites in the earlier years of the plan to address the undersupply rather than relying on a stepped trajectory involving the delivery of strategic sites in the later part of the plan period.

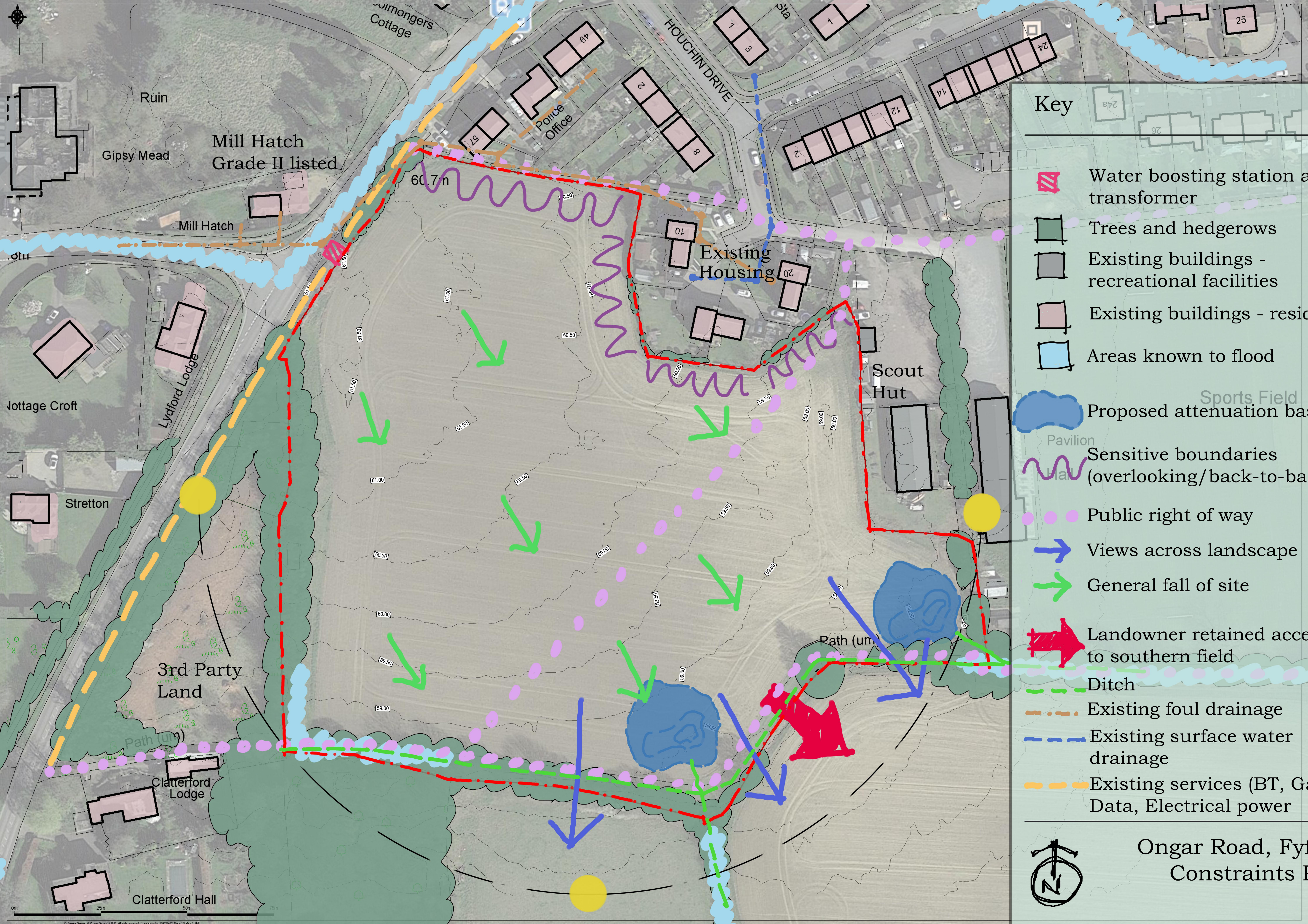
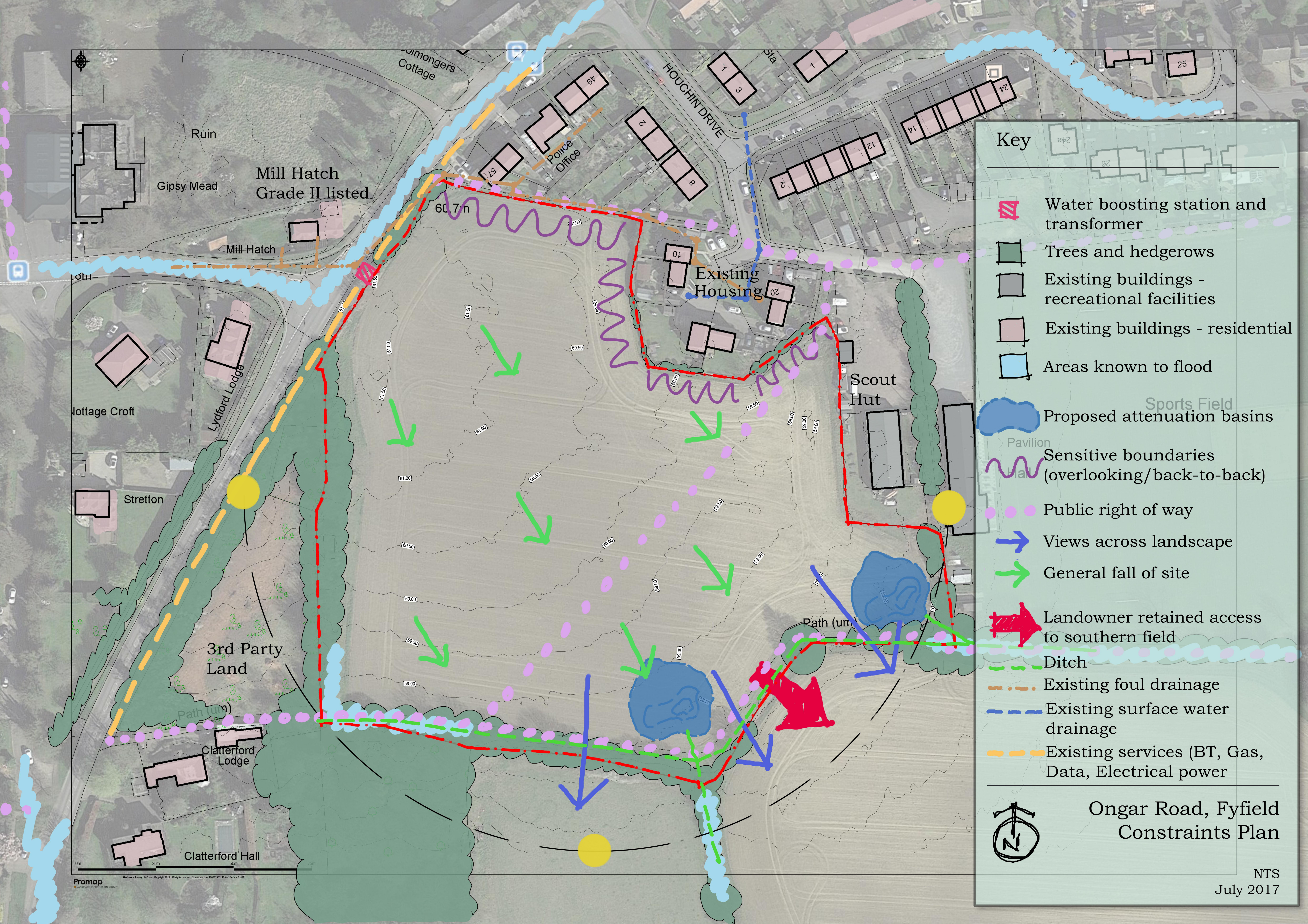
3.31 The provision of smaller sites, spread across the District would also provide choice to the market. This would give greater certainty on the delivery of a large number of homes earlier in the Plan period, rather than relying

on strategic locations to flood the local market in a single area. The recent Letwin Review highlighted absorption rates, particularly in relation to large, homogeneous ones, as a (if not the) key constraint to delivery.

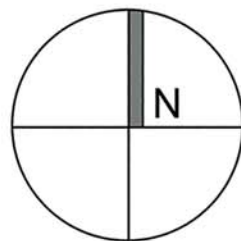
- 3.32 The Council rightly highlights within EB410A the NLP paper *“Start to Finish: How Quickly do Large-Scale Housing Sites Deliver?”* This analysed the delivery rates of large scale projects investigated both the realistic lead-in time for large-scale housing developments as well as the realistic annual build rate once the scheme starts delivering. The analysis considers the length of planning approval period for different sizes of site, including comparing largescale sites with small sites.
- 3.33 Even for sites that currently benefit from existing planning permissions considerable time is required to create an implementable permission, negotiating commercial deals, site clearance and infrastructure works all prior to the first housing completions being achieved.
- 3.34 The inaccuracy of forward supply projections has been a consistent problem across the country and a continual key matter of S78 appeals. It is these inaccuracies that have led to Government taking action under the 2018 NPPF by confirming the definition of “deliverable”. This confirms that sites comprising major development that do not benefit from detailed planning permission⁴, should only be included within a five year supply where *clear* evidence concludes housing completions will begin in that period. Whilst this Plan is not being tested under the 2018 NPPF, the supply will be when it comes to decision making following its adoption.
- 3.35 In this light, the inclusion of sites requiring a strategic masterplan or concept framework is entirely inappropriate. The complexities involved in forming and agreeing a masterplan where multiple ownerships are involved are well documented, with the increasing need on such sites from Homes England being a prime illustration of this.
- 3.36 Accordingly, if the Council wishes to ensure a five year supply can not only be demonstrated but also delivered, it should seek to identify a number of smaller sites across the District, giving greater certainty of their delivery within the first five years of the Plan. There are a number of ready-to-go sites, including that promoted by Countryside that can provide a robust, defendable five year supply.
- 3.37 This would act to reduce the pressure on the Council to deliver on strategic sites whilst maintaining sufficient housing land supply to address social and economic needs of the community. In the context of the affordability ratios in EFDC this measure would contribute to reducing the rise in social inequalities that are evident at present and set only to worsen under the proposed approach of the DLP.

⁴ So including sites with only outline permission.

APPENDIX 1 – CONSTRAINTS PLAN



APPENDIX 2 – SITE PLAN OPTION 1



APPENDIX 3 – EXTRACT FROM ‘RESULTS OF STAGE 1’ (EB801E)



Appendix B1.3
Results of Stage 1 Assessment for Residential Sites in
Fyfield

Site Reference	Site Address	Parish	Primary Use	1. Site entirely located outside Settlement Buffer Zones	2. Site entirely constrained by Flood Risk Zone 3B	3. Sites is entirely constrained by an internationally designated sites of importance for biodiversity.	4. Site is entirely constrained by County owned or managed wildlife site or Council owned or managed Local Nature Reserve	5. Site entirely constrained by Epping Forest and its Buffer Land	6. Site entirely constrained by HSE Consultation Zones Inner Zone	Overall	Site status	Justification
SR-0048	Land North of Chipping Ongar Road, Fyfield, Chipping Ongar Essex	Fyfield	Housing	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.
SR-0049	Land south-east of Chipping Ongar Road, Fyfield, Essex	Fyfield	Housing	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.
SR-0050i	Land to East of Fyfield, Fyfield	Fyfield	Housing	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.
SR-0050ii	Land to east of Fyfield, Fyfield	Fyfield	Housing	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.
SR-0128	Hérons Farm (1.75ha site), Herons Lane, Fyfield, Essex, CM5 0RQ	Fyfield	Housing	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.
SR-0131	Hérons Farm (6ha site), Herons Lane, Fyfield, Essex, CM5 0RQ	Fyfield	Housing	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.
SR-0399	Houchin Drive Playing Fields	Fyfield	Housing	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.
SR-0400	Land North of Willingale Road, Fyfield	Fyfield	Housing	No	Yes	No	No	No	No	Yes	Does not proceed	Site is constrained by Flood Risk Zone 3B.
SR-0879	Poultry Farm, Norwood End, Fyfield, Chipping Ongar, Essex	Fyfield	Housing	No	No	No	No	No	No	No	Proceed	Site is entirely or partially unconstrained.

**APPENDIX 4 – EXTRACT FROM ‘RESULTS OF THE STAGE 2 REPORT’
(EB901GII)**

Site Suitability Assessment

Site Reference: SR-0049
Parish: Fyfield
Settlement:
Size (ha): 2.65
Address: Land south-east of Chipping Ongar Road, Fyfield, Essex

Primary use: Housing
SLAA notes: Agricultural field

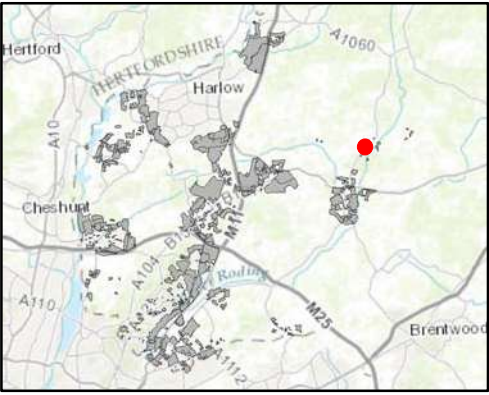
SLAA yield: 80 dwellings
SLAA source for baseline yield: Assumption based on 30 dph

SLAA site constraints: None

Site selection adjustment: None

Community feedback: The Council did not consult on a growth location which covers or is near to this site.

Dwellings: 80



Client

Epping Forest District Council

Job Title

Epping Forest District Local Plan

Drawing Status

Issue

Drawing No

SR-0049

Issue

P1

ARUP

Epping Forest District Council

www.eppingforestdc.gov.uk

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Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community



Criteria	Score		Qualitative Assessment
1.1 Impact on Internationally Protected Sites	0	Effects of allocating the site for the proposed use do not undermine conservation objectives (alone or in combination with other sites).	
1.2 Impact on Nationally Protected sites	0	Based on the Impact Risk Zones there is no requirement to consult Natural England because the proposed development is unlikely to pose a risk to SSSI's.	
1.3a Impact on Ancient Woodland	0	Site is not located within or adjacent to Ancient Woodland.	
1.3b Impact on Ancient/Veteran Trees outside of Ancient Woodland	0	No Ancient or Veteran trees are located within the site.	
1.4 Impact on Epping Forest Buffer Land	0	Site is unlikely to impact on Epping Forest Buffer Land.	
1.5 Impact on BAP Priority Species or Habitats	0	No effect as features and species could be retained or due to distance of BAP priority habitats from site.	The site is partially within a Deciduous Woodland buffer zone. The site may indirectly affect the habitat, but mitigation can be implemented to address this.
1.6 Impact on Local Wildlife Sites	0	Site has no effect as features and species could be retained or due to distance of local wildlife sites from site.	
1.7 Flood risk	(++)	Site within Flood Zone 1.	
1.8a Impact on heritage assets	(+)	No effect likely on historic assets due to distance from site.	
1.8b Impact on archaeology	(-)	Existing evidence and/or a lack of previous disturbance indicates a high likelihood for the discovery of high quality archaeological assets on the site.	
1.9 Impact of air quality	0	Site lies outside of areas identified as being at risk of poor air quality.	
2.1 Level of harm to Green Belt	0	Site is within Green Belt, but the level of harm caused by release of the land for development would be none.	
3.1 Distance to the nearest rail/tube station	(-)	Site is more than 4000m from the nearest rail or tube station.	
3.2 Distance to nearest bus stop	(+)	Site is within 400m of a bus stop.	
3.3 Distance to employment locations	0	Site is more than 1600m and less than 2400m of an employment site/location.	
3.4 Distance to local amenities	(-)	Site is more than 4000m from the nearest town, large village or small village.	
3.5 Distance to nearest infant/primary school	(+)	Site is less than 1000m from the nearest infant/primary school.	
3.4 Distance to local amenities	(-)	Site is more than 4000m from the nearest secondary school.	
3.7 Distance to nearest GP surgery	0	Site is between 1000m and 4000m from the nearest GP surgery.	
3.8 Access to Strategic Road Network		Not applicable.	
4.1 Brownfield and Greenfield Land	(-)	Majority of the site is greenfield land adjacent to a settlement.	100% greenfield site, adjacent to an existing settlement (Fyfield).
4.2 Impact on agricultural land	(--)	Development would involve the loss of the best and most versatile agricultural land (grades 1-3).	
4.3 Capacity to improve access to open space	0	Development unlikely to involve the loss of public open space.	
5.1 Landscape sensitivity	(--)	The site falls within an area of high landscape sensitivity - vulnerable to change and unable to absorb development without significant character change.	
5.2 Settlement character sensitivity	(-)	Development could detract from the existing settlement character.	The proposals are for higher density development than the neighbouring developments. Therefore, development is likely to affect the character of the area.
6.1 Topography constraints	(-)	Topographical constraints exist in the site but potential for mitigation.	
6.2a Distance to gas and oil pipelines	0	Gas or oil pipelines do not pose any constraint to the site.	
6.2b Distance to power lines	0	Power lines do not pose a constraint to the site.	
6.3 Impact on Tree Preservation Order (TPO)	0	The intensity of site development would not be constrained by the presence of protected trees either on or adjacent to the site.	
6.4 Access to site	(+)	Suitable access to site already exists.	
6.5 Contamination constraints	0	No contamination issues identified on site to date.	No potential contamination identified.
6.6 Traffic impact	0	Area around the site expected to be uncongested at peak time, or site below the site size threshold where it would be expected to affect congestion.	

**APPENDIX 5 – EXTRACT FROM ‘DECISIONS ON RESIDENTIAL SITES FOR
ALLOCATION IN FYFIELD’ (EB801M)**



Appendix B1.6.5
Decisions on Residential Sites for Allocation in
Fyfield

Site Ref	Address	Settlement	Size (Ha)	Capacity (Units)	Assessment of Insurmountable Constraints	Decision	Justification
SR-0049	Land south east of Ongar Road, Fyfield, Essex	Fyfield	2.65	82	On-site restrictions have been identified, but it was judged that these could be overcome, and it was not felt that identified deficiencies in secondary school places would adversely affect the achievability of the site.	Proposed for allocation	This site was identified as available within the next five years. It has been marketed and has no identified constraints or restrictions which would prevent it coming forward for development. The site should be allocated.

APPENDIX 6 – EXTRACT FROM ‘RESULTS OF STAGE 3’ (EB505I)

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Appendix B1.5.2
Results of Stage 3/6.3 Assessment for Residential Sites in
Fyfield

Strategic Option		Settlement		Option Suitability		Justification for Option Suitability			
Intensification		Fyfield		More suitable strategic option		The sites proposed for development are located around the centre of the settlement but are not clustered in one specific location. It is therefore not considered that there are distinct spatial options to locating residential development within Fyfield. Sites were assessed for their suitability on a case by case basis.			

Site Ref.	Address	Settlement	Site Size (Ha)	Capacity (Units)	Site Suitability	Justification for Site Suitability	Site Rank			Site Category	Site to Proceed for Further Testing
							Flood Risk	Location	Agricultural Land		
SR-0048	Land North of Ongar Road, Fyfield, Ongar, Essex	Fyfield	4.09	123	Not Suitable	This site scored poorly at Stage 2 in terms of landscape sensitivity and it was considered that it would promote unsustainable development patterns, as well as a scale of development that would harm the character of the village. It did not proceed any further.				N/A	The site did not proceed for further testing beyond Stage 3.
SR-0049	Land south-east of Ongar Road, Fyfield, Essex	Fyfield	2.65	80	Suitable	This site scored poorly at Stage 2 in terms of landscape impact but, given it is partially wrapped around by existing development, it was considered that this constraint could be overcome. The site therefore continued to proceed.	1	4	3	4	The site proceeded for further testing.
SR-0050i	Land to East of Fyfield, Fyfield	Fyfield	3.43	101	Not Suitable	This site scored poorly against several criteria at Stage 2, including landscape sensitivity. It was considered that it would promote unsustainable development patterns, ribbon development in an isolated location. The site did not proceed any further.				N/A	The site did not proceed for further testing beyond Stage 3.
SR-0050ii	Land to east of Fyfield, Fyfield	Fyfield	4.37	129	Not Suitable	This site scored poorly against several criteria at Stage 2, including landscape sensitivity. It was considered that it would promote unsustainable development patterns of ribbon development in a location that relates poorly to the existing settlement.				N/A	The site did not proceed for further testing beyond Stage 3.
SR-0128	Heron's Farm, Heron's Lane, Fyfield, Essex, CM5 0RQ	Fyfield	1.74	10	Not Suitable	This site scored poorly against several criteria at Stage 2, including landscape sensitivity, and would promote unsustainable development patterns in an isolated location away from the main part of the village. It did not proceed any further.				N/A	The site did not proceed for further testing beyond Stage 3.
SR-0131	Heron's Farm, Heron's Lane, Fyfield, Essex, CM5 0RQ	Fyfield	4.40	130	Not Suitable	This site scored poorly against several criteria at Stage 2, including landscape sensitivity, and would promote unsustainable development patterns in an isolated location away from the main part of the village. It did not proceed any further.				N/A	The site did not proceed for further testing beyond Stage 3.
SR-0399	Houchin Drive Playing Fields	Fyfield	2.75	83	Not Suitable	This site scored poorly against several criteria at Stage 2, including contamination. It was considered that the loss of playing fields in this location would not be desirable. The site did not proceed any further.				N/A	The site did not proceed for further testing beyond Stage 3.
SR-0879	Poultry Farm, Norwood End, Fyfield, Ongar, Essex	Fyfield	0.30	9	Not Suitable	This site scored poorly against several criteria at Stage 2, including landscape sensitivity, and would promote unsustainable development patterns in an isolated location away from the main part of the village. It did not proceed any further.				N/A	The site did not proceed for further testing beyond Stage 3.
SR-0935	Gypsy Mead, Ongar Road, Fyfield, Essex, CM5 0RB	Fyfield	0.81	25	Suitable	This site scored poorly against several criteria at Stage 6.2, including landscape sensitivity and TPO impact, but it was considered that these constraints could be overcome. The site is partially wrapped around by existing development and would comprise infill. The site therefore continued to proceed.	1	4	3	4	The site proceeded for further testing.

APPENDIX 7 – EXTRACT FROM ‘RESULTS OF STAGE 4’ (EB805N)

Site Deliverability Assessment

Site Reference: SR-0049

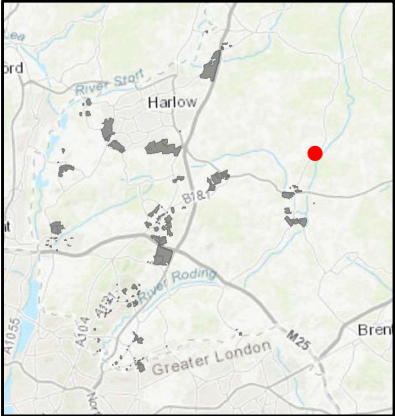
Settlement: Fyfield

Address: Land south-east of Ongar Road, Fyfield, Essex

Notes: Agricultural field

Land type: Low performing Green Belt adjacent to a settlement

Primary use: Residential



Client

Epping Forest District Council

Job Title

Epping Forest District Local Plan

Drawing Status

Issue

Date

March 2018

Drawing No

Issue

Rev 2

ARUP

Epping Forest District Council

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Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

Indicative Site Capacity Assessment

Site boundary amendment: None

Site constraints affecting extent of developable area

Site area (ha): 2.65

On-site major policy constraints: Not applicable.

Area of site subject to major policy constraints (ha): 0.00

On-site non-major policy constraints: Not applicable.

Area of site subject to non-major policy constraints (ha): 0.00

Unconstrained site area (ha): 2.65

Establishing indicative baseline density

Site located in: Small Village

Site setting is: Other

Site is near a commuter hub: No

Indicative baseline density (dph): 34.5

Indicative baseline yield (units): 91

Refining the indicative site density

Identified density constraints: No constraints

Constraints density adjustment: 0% **(dph):** 34.5

Justification for adjustment: No constraints affecting site capacity identified. No capacity adjustment made.

Local setting: No adjustment made for local setting.

Local setting density adjustment: 0% **(dph):** 34.5

Incorporate mixed use development: Site is promoted for residential use only. No mixed use capacity adjustment.

Mixed use density adjustment: 0% **(dph):** 34.5

Gross to net adjustment: -10% **(dph):** 31.1

Existing on-site development (units): 0

Indicative net site capacity (units): 82

Further site boundary amendment:	No
Justification for further site boundary amendment:	No amendment to site area.
Updated unconstrained site area (ha):	2.65
Updated indicative net site capacity (units):	82

Availability and Achievability Assessment

Criteria	Score		Qualitative Assessment
1.1 Ownership	(+)	Site is in single ownership	Information provided through the LPD Survey 2016 confirms that the site is in single ownership.
1.2 Existing uses	(+)	There are no existing uses on-site or existing uses could cease in less than two years	Confirmed by the LPD Survey 2016.
1.3 On-site restrictions	0	Site is subject to restrictions but agreement in place or being negotiated to overcome them, or not judged to be a constraint	Information provided through the LPD Survey 2016 indicates that a public right of way (Stort Valley Way) runs through the site. The promoter confirmed that this could be retained and would not constrain development.
1.4 Site availability	(+)	Site expected to be available between 2016 and 2020	Confirmed by information provided through the LPD Survey 2016.
2.1 Site marketability	0	Site is being actively marketed for development or enquiries have been received from a developer	Confirmed by information provided through the LPD Survey 2016.
2.2 Site viability	(+)	No viability issues identified	Although no viability testing has been undertaken by the site promoters, based on the site's postcode area the SHMA Viability Assessment has not identified any viability issues.
2.3 On-site and physical infrastructure constraints	(+)	There are no known on-site constraints which would impact upon deliverability	Information submitted through the Regulation 18 Draft Local Plan consultation confirms that there are no known on-site constraints which would impact upon deliverability.
2.4a Primary schools (Planning area)	(+)	Site is located in a school planning area with both existing and forecast capacity	
2.4b Primary schools	(+)	Site is located within 1km of a primary school with current capacity and no forecast deficit.existing and future forecast capacity.	
2.5a Secondary schools (Planning area)	0	Site is located within a Secondary Forecast Planning Group with either a current or forecast deficit but schools have the potential to expand, or the school planning area has forecast capacity but with limited ability to expand in the future.	
2.5b Secondary schools	(-)	Site is not located within 1km of a secondary school, or is located within 1km of a secondary school with both current and forecast capacity deficit.	
2.6 Access to open space	(-)	Site is more than 600m from existing publicly accessible open space.	
2.7 Health	(-)	Site is located more than 1km from a health facility (GP).	
2.8 Impact on mineral deposits	(+)	None of the site is located within a minerals safeguarding area	
3.1 Cumulative loss of open space in settlement		The site has not been included in the assessment as it is not proposed for allocation	
3.2 Cumulative impact on primary school (Planning area)		The site has not been included in the assessment as it is not proposed for allocation	
3.3 Cumulative impact on secondary schools (Planning area)		The site has not been included in the assessment as it is not proposed for allocation	
3.4 Cumulative impact on the green infrastructure		The site has not been included in the assessment as it is not proposed for allocation	
3.5 Cumulative impact on sewage treatment work capacity		The site has not been included in the assessment as it is not proposed for allocation	
3.6 Cumulative impact on Central Line capacity		The site has not been included in the assessment as it is not proposed for allocation	
3.7 Impact on water networks		The site has not been included in the assessment as it is not proposed for allocation	
3.8 Impact on wastewater networks		The site has not been included in the assessment as it is not proposed for allocation	B906

**APPENDIX 8 – EXTRACT FROM ‘RESULTS OF IDENTIFYING SITES FOR
ALLOCATION’ (EB805P)**

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Appendix B1.6.6
Decisions on Residential Sites for Allocation in
Fyfield

Site Ref	Address	Settlement	Size (Ha)	Capacity (Units)	Assessment of Insurmountable Constraints	Decision	Allocation Justification
SR-0049	Land south-east of Ongar Road, Fyfield, Essex	Fyfield	2.65	82	On-site restrictions were identified, but it was considered that these could be overcome, and it was considered that identified deficiencies in primary and secondary school places and GP surgeries would not adversely affect the achievability of the site; consideration of infrastructure requirements has been dealt with through the Infrastructure Delivery Plan (2017).	Not proposed for allocation	This site was proposed for allocation in the Draft Local Plan (2016). While it was identified as available within the first five years of the Plan period and has no identified constraints or restrictions which would prevent it coming forward for development, on balance it was considered that an alternative site assessed in Fyfield through Stage 6.4 (SR-0935) was more suitable and would provide for a scale of growth that is more appropriate to the settlement. The site is not proposed for allocation.
SR-0935	Gypsy Mead, Ongar Road, Fyfield, Essex, CM5 0RB	Fyfield	0.81	14	On-site constraints were identified, but it was considered that these could be overcome, and that identified deficiencies in secondary school places and GP surgeries would not adversely affect the achievability of the site; consideration of infrastructure requirements has been dealt with through the Infrastructure Delivery Plan (2017).	Proposed for allocation	This site was identified as available within the first five years of the Plan period. It has been marketed and has no identified constraints or restrictions which would prevent it coming forward for development. The site is proposed for allocation.