

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

- 1. The Council should provide a summary of the process by which the Plan's housing allocations were selected. In particular:**
  - a. How was the initial pool of sites for assessment identified?**
  - b. How was the Site Selection Methodology (SSM) utilised in the Site Selection Report 2018 (EB805) established and is it robust?**
  - c. What is the relationship between the SSM and the sequential approach to site selection set out in Policy SP2(A)?**
  - d. What was the role of the Sustainability Appraisal in selecting between the various sites?**
  - e. Was any other evidence taken into account in the site selection process? In particular, how has the historic environment been taken into account?**
  - f. Have Historic Impact Assessments been undertaken as recommended by Historic England and, if not, is this necessary?**

**How was the Site Selection Methodology (SSM) utilised in the Site Selection Report 2018 (EB805) established and is it robust?**

Day 1 of the hearing established that consultants responsible for producing parts of the evidence-base did not attend their own consultation sessions, (specifically, the consultants Global Four). Well-run consultation allows for faulty information at the ground level to be corrected, and conversely, if not carried out effectively, errors would persist.

Furthermore it is evident from the number of basic errors/inconsistencies in treatment of sites that the application of methodology has not been consistent or based on the facts on the ground. Paragraphs 1.3 and 1.4 of EB805AK – Site Selection Methodology state that:

*1.3 The evidence base informing the preparation of the Local Plan must include "adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area..." (NPPF paragraph 158).*

*1.4 To be adequate, the evidence base must be robust; assessments should be founded upon a cogent methodology, undertaken in a transparent manner and fully documented at key stages. Professional judgements require justification and site selection decisions must be clearly explained.*

The volume of inconsistencies and errors in site selection processes demonstrates the lack of robustness, and the flawed evidence-base and methodology application has led to unjustified decisions in site selection.

- 2. How were the conclusions reached about individual sites checked for accuracy and consistency? Were sites visited or were they assessed through a desk-top process? What has been done to check the assessments in specific cases where their accuracy has been challenged e.g. Site SR-0596? (Reps 19LAD0012).**

A range of inconsistencies are identified below. At no stage have these inconsistencies been justified or corrected.

Site Reference	Address	Classification Errors and Impact
SR-0557	The Limes Farm Estate, Chigwell	<p>This contains a large open green space that the draft neighbourhood plan sought to protect.</p> <ul style="list-style-type: none"> <li>- Local objection to the Draft Local Plan to include this site was extremely high.</li> <li>- There is no reference to the high number of objections within the Community Feedback section.</li> <li>- In Appendix B, the site has been classified as Urban Brownfield (and qualitatively assessed as 100% brownfield). Urban Open Space would evidently be more accurate.</li> </ul> <p>As a result of this site being taken forward, there will be a loss of open green space.</p>
SR-0478B	Part of Chigwell Nursery, 245 High Road Chigwell	<p>This is a garden nursery on green belt land. It is neighboured by listed buildings. If the site selection methodology had been followed correctly, this site is unlikely to have been selected for allocation in the LP.</p>
SR-1009	130 Hainault Road, Chigwell	<p>This is a detached house in an area characterised by flatted developments, houses and commercial developments. Neighbouring houses have been classified as Urban Brownfield (and qualitatively assessed as 100% brownfield) with no impact on settlement character. This site has been classified as urban open space and detrimental to settlement character, with no supporting evidence. As a result, density has been artificially capped below efficient use of land, based on unjustified and inconsistent site assessment.</p>
SR-1010	146 Hainault Road, Chigwell	<p>This is a detached house in an area characterised by flatted developments, houses and commercial developments. Immediately neighbouring houses have been classified as Urban Brownfield (and qualitatively assessed as 100% brownfield) with no impact on settlement character. This site has been classified as urban open space and detrimental to settlement character. There is nothing in the evidence base to support such a characterisation and it is inconsistent with equivalent neighbouring properties.</p> <p>As a consequence, housing density appears artificially capped below efficient use of land. The neighbouring development at 126 Manor Road has housing density of 86 dwellings per hectare (dph).</p> <p>Furthermore, criterion 1.3 of the Stage 4/6.4 Capacity and Deliverability Assessment states that the “<u>Site is not subject to any known restrictions. No data is held on on-</u></p>

site restrictions.” However Appendix B1.6.6 notes that *“On-site restrictions were identified”*. **This latter conclusion is unsubstantiated by the evidence-base of the LP, in fact the evidence-base contradicts Appendix B1.6.6.**

Appendix 6 then claims *“The site has access constraints. Development proposals should assess whether the current access to the residential property would provide a safe access point which has sufficient capacity to serve the proposed residential development. This includes ensuring that appropriate visibility splays can be accommodated within any existing or proposed access point.”*

Appendix 6 contradicts the evidence-base of the LP and is unsubstantiated.

Furthermore the Planning Inspector determined on appeal (APP/J1535/W/17/3190595) on 27 July 2018 that development was permitted for demolition and new build of 11 apartments (with housing density of approximately 65dph, versus LP indication of 50dph). The Planning Inspector set out the following in her findings regarding to access and capacity impact on highway safety:

*“The plans show both site accesses would be widened to four metres but the Highway Authority (HA) requires a width of 5 metres for the first 6 metres of an access to allow vehicles to pass each other. However, the site would have separate access and egress points, and **the HA has accepted that the southern access, which is proposed to be used to exit the site, would have sufficient visibility in both directions.** Accordingly a 5 metre width is not necessary to avoid increased risks to highway safety.”*

*“In relation to LP Policy ST4 (ii), **no evidence has been put forward by the Council to demonstrate that the proposal is likely to lead to an excessive degree of traffic congestion,** and the traffic survey submitted by the appellant concludes that there would be only a 1% increase in traffic on Hainault Road. **This evidence is unchallenged by the HA and the Council.** Whilst the development would increase the number of vehicle movements to and from the site there is no compelling evidence before me that this would have an unacceptably adverse effect on the operation of the local highway network, including the use of the nearby bus stop.”*

**The Council was unable to substantiate claims recorded in the LP and forming the basis for the refusal to the Planning Inspector when called to do so at appeal.**

This statement's appendix provides additional examples of inconsistencies and unreliable application of methodology.

We request that land definitions are classified correctly and consistently at the examination stage, given how definition of land can have significant social and legal implications. For example, the loss of open green space at Limes Farm is significant to the local community, yet the SSM has classified this as Urban Brownfield (100%).

We also seek remedy, as set out in table 2 of this statement's appendix, for the misclassifications, errors and inconsistencies identified therein.