

MATTER 6: Housing Supply, including Sources of Supply; the Housing Trajectory; and the Five Year Supply.

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?

In determining the contribution of allocated sites to the housing land supply, how have site densities been worked out? Is there any general risk that the capacity of sites has been over-estimated?

Regarding apartment buildings, it appears capacity has been under-estimated and restricted to less than efficient use of land. Two examples:

SR-1009	130 Hainault Road, Chigwell	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.
SR-1010	146 Hainault Road, Chigwell	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, and there has been an incorrect and unfair site assessment. Criterion 1.3 of the Stage 4/6.4 Capacity and Deliverability Assessment states that the “Site is not subject to any known restrictions. No data is held on on-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 SVLP.

In document EB805N, Settlement Character was a key driver to reduce density for SR-1009 and SR-1010. This ignores all findings by the Planning Inspector regarding the character of the area, and ignores the reality of densities existing at the time, ranging from 70-100dph.

As a result, SR-1009 was removed from the Local Plan. Based on a 70 dwellings per hectare, this site could have contributed eleven flats to the housing supply, which is already approximately 10% below the OAN.

Remedy: Include site SR-1009 (130 Hainault Road) on the Local Plan, with capacity for 11 flats.