
EPPING FOREST LOCAL PLAN EXAMINATION

Matter 5: Site Selection Methodology and the Viability of Site Allocations

**Hearing Statement on behalf of Bullwood Ltd (Ref 19LAD0068)
Relating to Land at Woolston Manor Golf Course, 'Roding New
Garden Village'**

1. ISSUE 1: HAVE THE PLAN'S HOUSING ALLOCATIONS BEEN CHOSEN ON THE BASIS OF A ROBUST ASSESSMENT PROCESS?

Question 1: How was the initial pool of sites for assessment identified? How was the Site Selection Methodology (SSM) utilised in the Site Selection Report 2018 (EB805) established and is it robust? What is the relationship between the SSM and the sequential approach to site selection set out in SP2(A)? Was any other evidence taken into account in the site selection process? In particular, how has the historic environment been taken into account?

1.1 Part iv) of the Local Plan Vision states at Para 2.27 that: [*inter alia*]

“By 2033, Epping Forest will be a place where... iv) development needs will be met in the most sustainable locations”

1.2 It is evident that a fundamental aim of the draft Local Plan is to deliver growth in the most sustainable locations. Figure 1.1 of the draft Local Plan (appended at Appendix 2 of this Statement) denotes the transport infrastructure and key settlements in the District, and this provides a sensible starting point for informing sustainable patterns of growth. In comparison, Map 2.5 of the draft Local Plan (appended at Appendix 3 of this Statement) shows the areas that have been proposed for Green Belt release to accommodate future development across the plan period. On any rational analysis, there is a clear spatial disconnect between the key infrastructure/settlements and the distribution of land that is currently being earmarked for Green Belt release by the local planning authority. The degree of disparity calls into question both the site selection methodology and application of site assessment procedure, as well as the Council's assessment of the relevant constraints and credentials.

1.3 Having reviewed the accompanying site selection evidence, Bullwood Ltd consider that the Council has missed an opportunity to identify a deliverable and sustainable spatial strategy by undertaking a flawed site selection process that is not robust.

1.4 The Council's Site Selection Methodology (SSM) discounted sites that are located outside of 'settlement buffer zones' – land areas adjoining settlements that the Council asserts are defined in the Council's Settlement Hierarchy Technical Paper (2015). However, the Technical Paper does not appear to demarcate such Buffer Zones, and nor does it provide a clear methodology that can be understood by all parties. Accordingly, there are sites that adjoin settlements with the potential to create highly sustainable patterns of development, which have been erroneously dismissed on the basis of arbitrary measures with an incomplete and erroneous evidence base.

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- 1.5 The Council's approach to Site Selection does not consider, nor does it assess, the merits of the concept of Loughton-Debden expansion to the east because it determined that the M11 represented an infrangible limit of the settlement and that any land to the east of the M11 was beyond the settlement buffer zone.
- 1.6 The methodology deficiency is evident from viewing the map extracts for Debden-Loughton and Chigwell from the Site Selection Appendix B1.3, replicated for ease of reference at Appendices 4 and 5 of this Hearing Statement. Land to the east of Debden Tube Station clearly has a much stronger spatial relationship with Debden than Chigwell, yet it has been dismissed on the basis of its weak and distant relationship to the settlement of Chigwell, rather than its strong and prominent spatial relationship with Debden-Loughton – one of the largest settlements in the District and where highly sustainable patterns of development can be achieved due the level of service and infrastructure provision and the accessibility to public transport hubs like the tube station. This approach is clearly misguided and not in accordance with paragraph 84 of the 2012 NPPF, against which the draft Local Plan is being assessed, and nor does it conform with new national policy in the 2018 NPPF, which states at Paragraph 138 that [*inter alia*] “*where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously developed and/or is well served by public transport*”.
- 1.7 The concept of locating strategic-scale development beyond a motorway is not new or radical – particularly in close proximity to a junction. A good example of this is at Milton Keynes where Milton Keynes Council's Local Plan has established the concept of growth to the east of the M1 as a central component of the district's spatial strategy. In the case of Epping Forest District, the option of expanding one of the largest and most sustainable settlements in the District to the east of the M11 should, at the very least, have been tested. Moreover, were it not erroneously assessed in terms of Chigwell expansion, we believe that this growth option would have scored very highly in terms of sustainability, its deliverability, its merits relative to other large sites (for example it is not in agricultural use), and also in Green Belt impact terms.
- 1.8 When considered against draft Policies SP2 (Spatial Development Strategy) and SP3 (Place Shaping), it is evident that it was the Council's intention for growth to be channelled to the most sustainable locations, yet this envisaged pattern of planned growth does not correspond with the land that has been identified for major development in the draft Local Plan. If the Council's vision had properly informed the scope of an objective and reflective approach to site selection, locations such as land east of Debden to the east of the M11 would have been identified as a suitable and sustainable location for growth – be that through an allocation, or indeed the safeguarding of land to ensure that this Authority has potential developable land set-aside to meet the longer term growth requirements of the District (NPPF, Paragraph 85), especially in light of planning policy relevant to any subsequent Local Plan Review. This has not happened and, instead, the draft Local Plan presents a spatial strategy where growth has not been channelled to the most sustainable locations.

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- 1.9 Comparatively low levels of growth have been assigned to Loughton-Debden, despite it being one of the largest and most sustainable settlements within the District, with excellent road and public transport infrastructure. The Inspector is right to query the relationship between the Site Selection Methodology and the site selection criteria in SP 2(A). It is also valid to question the extent to which the SSM has influenced and informed the amount of growth at settlements identified in Policy SP 2(B). Had the SSM been applied objectively at Debden-Loughton, the potential for greater growth to be delivered on land with good accessibility and proximity to Debden Tube Station would have been considered – notably the site subject of this Hearing Statement, the land at Woolston Manor Golf Course (Appendix 1).

Question 2: How were the conclusions reached about individual sites checked for accuracy and consistency? What has been done to check the assessments in specific cases where their accuracy has been challenged?

- 1.10 The example highlighted at Loughton-Debden reveals that the methodology and application were eschew and that sustainable development opportunities have been erroneously dismissed at the initial stages of the high-level Desktop 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?

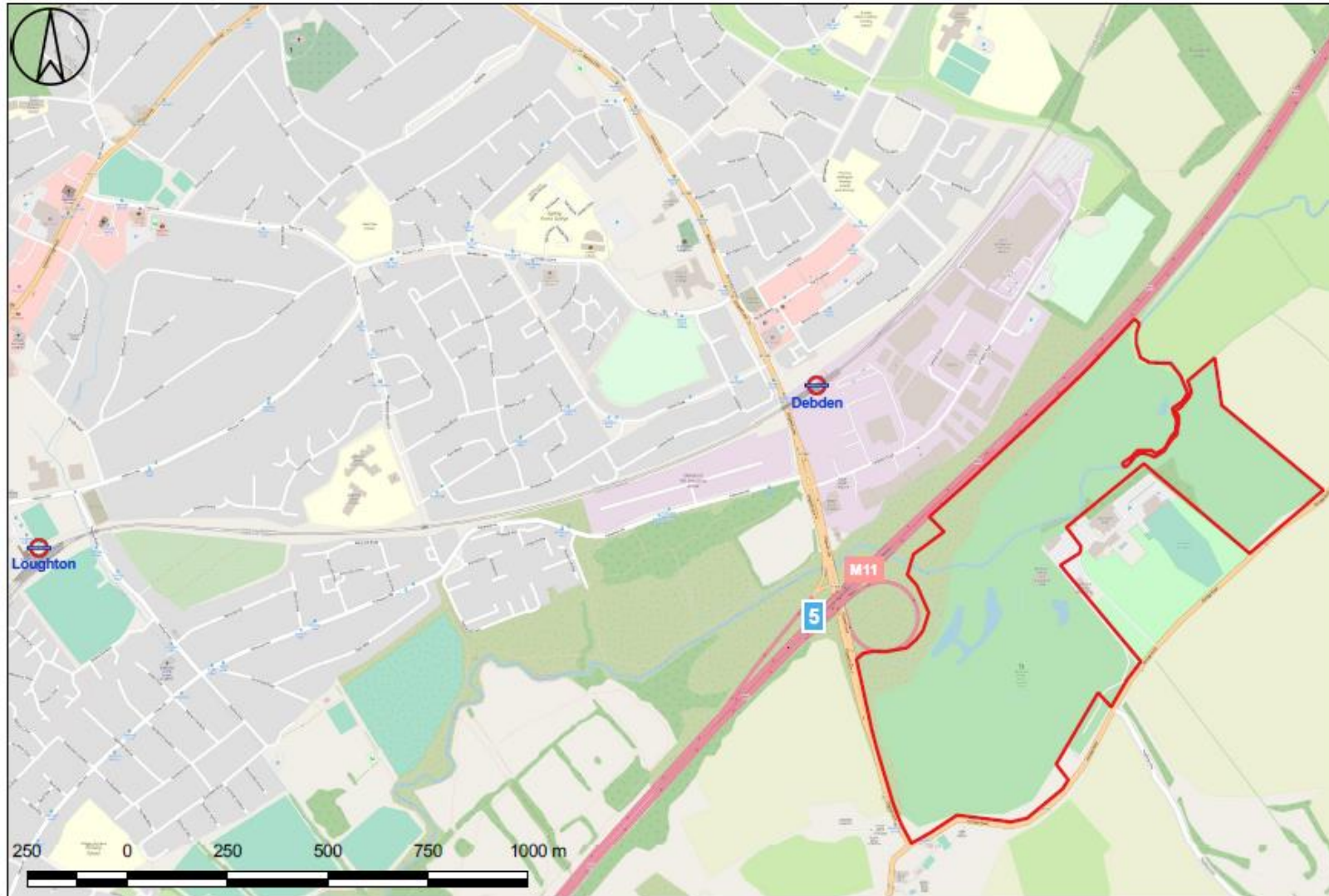
- 1.11 There was significant change between Regulation 18 and Regulation 19 versions of the Plan and it is unclear to Bullwood Ltd as to whether the changes result in a more or less sustainable Plan as a result. Whilst it is not a relevant test of soundness to demonstrate that the Plan's spatial approach is the most sustainable option available, it is a relevant test that the Plan is sustainable and justified. It is therefore a matter of some concern that sustainable growth options have not been properly considered and assessed and that the growth is not being channelled to higher tier settlements where the road and rail transport infrastructure is located in the District.
- 1.12 In addition, it is also unclear whether the Regulation 19 spatial strategy is likely to deliver homes at a faster or slower rate than the Regulation 18 version. There are fewer sites allocated in the Regulation 19 Plan, which would suggest that the change in approach will both dampen housing delivery in the early years, and lead to less overall housing completions across the plan period.

Having regard to Question 1c above (the relationship between the SSM and the sequential approach to site selection set out in Policy SP2(A)), is the sequential approach to site allocation set out in Policy SP2(A) justified, particularly in respect of the value placed upon

open spaces within settlements? How was the adequacy of remaining open space within a settlement measured (Policy SP2(A)(iv))?

- 1.13 Bullwood Ltd considers that it would be preferable, as a point of principle, to protect open spaces within settlements such as Debden-Loughton – particularly where there is clear potential adjacent to these settlements to create sustainable urban extensions. This would minimise planning harm to existing residents in those communities, whilst providing the opportunity to create new SANG and well-designed neighbourhoods that promote health and recreation opportunities.
- 1.14 It is understandable why the Inspector has queried the relationship between the SSM and the sequential approach at Policy SP2(A), given that Criteria 4.3 and 3.1 of the SSM (identified in EB805K) only scores a site positively if it improves access to open space and if it doesn't involve the loss of public open space. Consequently, the outlined sequential approach contradicts the SSM scoring assessment by prioritising sites that by necessity entail a quantitative loss of open space over sites that would create new additional open space for the benefit of both future and existing residents.

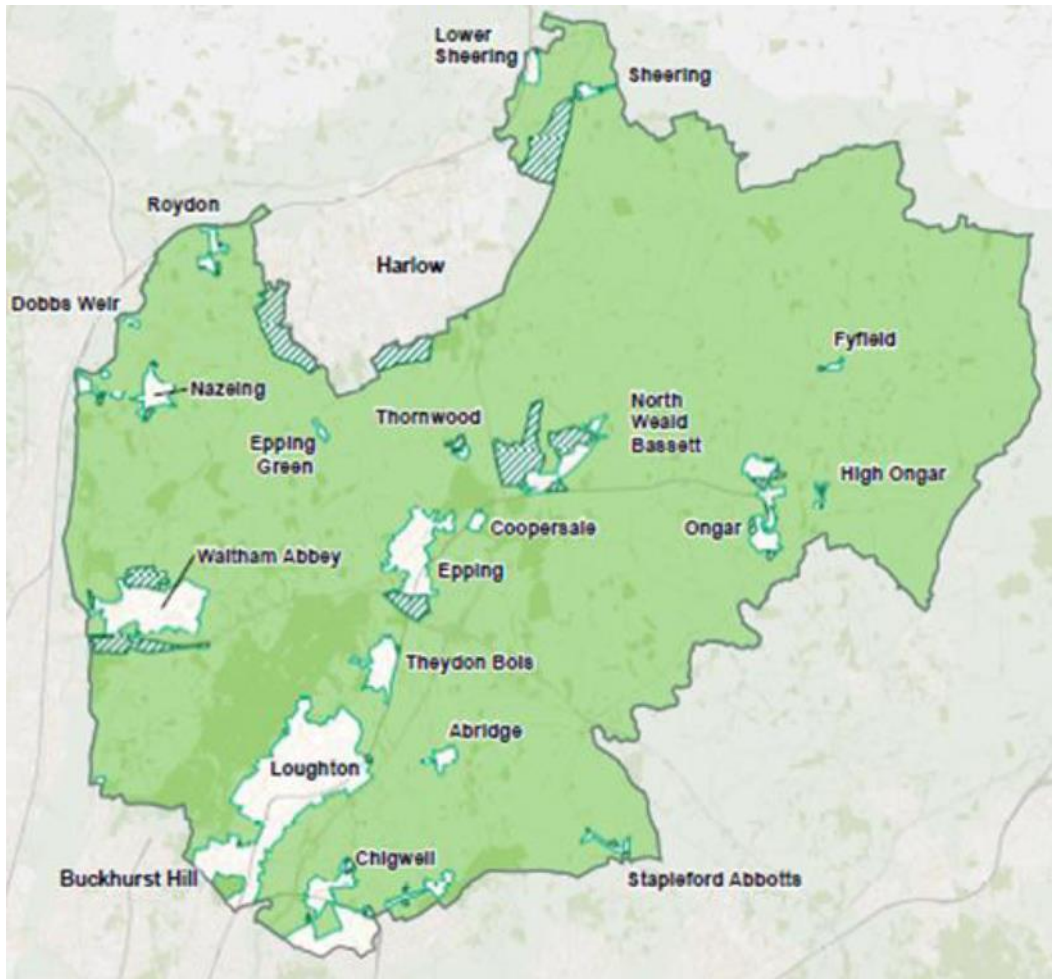
APPENDIX 1 – WOOLSTON MANOR GOLF CLUB SITE LOCATION PLAN



APPENDIX 2 – DRAFT LOCAL PLAN FIGURE 1.1 - PRINCIPAL SETTLEMENTS AND TRANSPORT INFRASTRUCTURE IN EPPING FOREST DISTRICT



APPENDIX 3 – DRAFT LOCAL PLAN MAP 2.5 – AREAS OF PROPOSED GREEN BELT REVIEW TO ACCOMMODATE MAJOR GROWTH



APPENDIX 4 – SSM ASSESSMENT OF DEBDEN-LOUGHTON FROM EB805AJ (Site annotated with red star)



APPENDIX 5 – SSM ASSESSMENT OF DEBDEN-LOUGHTON FROM EB805AJ (Site annotated with red star)

