
EPPING FOREST LOCAL PLAN EXAMINATION

Matter 6: Housing Supply

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

1. ISSUE 1: WILL THE PLAN PROVIDE A LAND SUPPLY SUFFICIENT TO DELIVER THE HOUSING REQUIREMENT OF AT LEAST 11,400 DWELLINGS

1.1 This Statement has been prepared on behalf of Bullwood Ltd who are promoting Land at Woolston Manor Golf Club (see Appendix 1) for development. This is an omission site which could contribute to housing – and supporting non-residential infrastructure complimentary to adjacent existing development – delivery in the five-year period and beyond.

Q1. 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?

1.2 Based on Table 1 in EB410A we understand that completions over the 2011-18 period total 1,856 homes. Commitments on sites with extant planning permission total a modest 1,497 units but the Council applies a 10% non-implementation allowance (-149 dwellings) meaning the effective assumed supply from this source is 1,348 dwellings.

1.3 Allocated sites without planning permission (based on EB410A Appendix 1) total 9,551 dwellings, based on the Council's figures; and a windfall allowance has been included from 2023 onwards (a total of 350 dwellings through the remaining plan period).

1.4 The total supply thus, on the Council's figures, totals 13,105 dwellings over the plan period. This in theory exceeds the putative requirement of 11,400 by 15%.

Q2. Policy SP2(c) indicates that additional housing could be delivered through Neighbourhood Plans and on rural exception sites in accordance with Policy H3. Is it possible to quantify this contribution and should it be reflected in Table 2.3?

1.5 The NPPF requirement is to identify a supply of specific deliverable sites for Years 1-5 from adoption, and a supply of specific developable sites or broad locations for growth for Years 6-10 and where possible Years 10-15.

1.6 There are currently no adopted neighbourhood plans which include housing allocations. There is no certainty that neighbourhood plans would allocate sites, or what yield could arise from any such allocations; nor any certainty regarding the scale of any further housing which might be achieved from rural exception site development. For example, the Examiner's Report into the Chigwell Neighbourhood Plan has found a range of deficiencies in the Plan, including in respect of housing policies, and concluded that the Plan should not proceed to a referendum.

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- 1.7 On this basis, any development coming forward from these sources should only be counted as contributing to the allowance already included for windfall development (35 dpa post 2023).

Q3. Is the expected windfall allowance of 35 dwellings per annum for 11 years (385 in total) justified?

- 1.8 The windfall allowance is not justified. The NPPF (Para 48) requires compelling evidence that windfall sites have consistently become available in the local area and will continue to provide a reliable source of supply. It is thus insufficient to simply refer to historical trends, which have clearly been influenced by the lack of an up-to-date plan. The Council has not demonstrated compelling evidence that windfall development will, moving forwards, will continue to be a reliable source of supply.
- 1.9 There is a lack of clarity on how the windfall allowance has been determined with the Council's Housing Implementation Strategy (EB410A) arguing simply that it is below total average net annual completions since 2006. The evidential basis justifying this figure is lacking.

Q4. 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?

- 1.10 Yes. The assumptions used in assessing site capacity are high level, and have had little regard to considerations such as the appropriate massing taking account of the local context, and car parking requirements. We consider that there is a clear risk that site capacities on some sites have been over-estimated. For example:
- LOU.R1 (Loughton Station Car Park): the Plan identifies the capacity of this site as approximately 165 dwellings. Yet the Site Selection Methodology Report (EB805N), Appendix B1.6.4 identified an indicative capacity of this site at 113 units; and this assumes re-provision of London Underground parking at basement level, which may not be either technically feasible or viable.
 - LOU.R2 (Debden Station Car Park): the Plan identifies the capacity of this site as approximately 192 dwellings. This is consistent with the Site Selection Methodology Report (in contrast to LOU.R2 above) but again assumes re-provision of the London Underground parking at basement level, which may not be either technically feasible or viable.
 - LOU.R4 (Borders Lane Playing Fields): the Plan identifies the capacity of this site as approximately 217 dwellings. This is based on the Site Selection Methodology Report's assessment that the College consider that "around 50% of the site should be developed for housing and 50% should be retained for provision of new college facilities and sports

provision.” This is a very high level assessment and once other policy requirements are considered, it is likely the developable area will reduce and that the yield will be lower.

2. 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?

Q1. 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?

- 2.1 Taking an annualised requirement of 518 dpa over the 7-year period to 2018 yields a requirement for 3,626 dwellings (518 x 7). Set against this are completions of 1,856 dwellings, resulting in a shortfall of 1,770 dwellings. Delivery over this period has been poor, meeting little over half (51%) of the level of housing required; a level which itself arguably understates the District's housing need.
- 2.2 A crucial reason for poor delivery in this District has been the lack of an up-to-date development plan. The housing allocations in the adopted Local Plan were delivered by 2006 (EB410A Para 3.22) and there has been no effective forward planning in recent years. The new Local Plan was originally intended to be examined in 2013 and adopted in April 2014 (see 2011-12 AMR EB1708H Table 10). Regrettably, its preparation has been subject to significant delay for various reasons, albeit delivery problems are not wholly contingent on this factor and it has been the highly-restricted approach to land identification and earmarked release which has undermined effective land promotion and the meaningful progression of schemes.
- 2.3 In any event, and notwithstanding, it is unacceptable and contrary to national policy for housing delivery to be further delayed by an approach which seeks to phase delivery towards latter years, the effect of which is to compound historic under-delivery and underperformance against objectively-assessed needs until beyond 2023.
- 2.4 The Government's objectives are clear - to boost significantly the supply of housing to address housing affordability, which in this District is acute. Government has been clear in the PPG, through local plan examinations, and through appeal decisions, that a Sedgefield approach should be used where possible. A stepped trajectory should not be used simply to delay meeting identified development needs, as is proposed by the Council here.

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- 2.5 We consider that the Inspector should test both a) whether a stepped trajectory is justified; and b) if it is, whether the stepped figures put forward by the Council are justified.
- 2.6 The Council has put forward its rationale for adopting a stepped trajectory in EB410A. We do not accept this and consider that an alternative and obvious strategy could have been pursued that sought to allocate additional sites in sustainable locations which can contribute to delivery in the short-term. This has been required by Inspectors at other recent Local Plan Examinations, for example in Canterbury and Guildford where additional allocations were required to bolster the prospects of having a realistic land supply position.
- 2.7 Moreover, the Council's proposed stepped trajectory continues to under-deliver against its OAN (which itself falls well below the figure arising from the Government's standard methodology) over the period to 2023, allowing the delivery shortfall to grow and compounding the economic and social problems associated with housing under-delivery. Notwithstanding issues affecting the ability to meet a historic shortfall, this is clearly inconsistent with national policy which focuses on identifying and then meeting development needs. As a minimum, the housing requirement should meet the district's housing need over the five years from adoption – otherwise it is planning for a further deterioration in affordability.
- 2.8 The five-year land supply position can be boosted through the inclusion of additional housing allocations which are not contingent on major infrastructure and can start delivering before 2023. Development of land at Woolston Manor Golf Course, Loughton can contribute to boosting housing delivery in the short-term within the five-year period; and maintaining delivery beyond Year 5. The Inspector examining the Guildford Local Plan has required additional housing allocations to be identified, tested and included in the Local Plan, including through the further amendment of Green Belt boundaries, to contribute to early delivery.
- 2.9 The requirement to identify and allocate additional land for housing is particularly justified given that the Plan as drafted falls substantially short of meeting the District's local housing need as defined using the standard method (725 dpa), and addressing this now is clearly preferable to deferring the issue to a future plan review, the effect of which would be to simply further constrain housing delivery and the ability to meet housing need in the short- and medium-term – contrary to national policy.

b. What buffer should be included in the five-year supply requirement (moved forward from later in the Plan period) to ensure choice and competition in the market for land? Is the relevant buffer justified? The Housing Trajectory in Appendix 5 indicates that 5% has been added to the annualised requirement for every remaining year of the Plan period. Why is this?

- 2.10 It is clear that a 20% buffer should be applied whether the 2012 or 2019 Framework approach is used.

2.11 The scale of under-delivery over the plan period to date is very significant, with under-delivery against the OAN in each year between 2011-18; a sizeable cumulative under-delivery of 1,770 dwellings and delivery which has met just 51% of the OAN. Using the 2012 Framework approach, the evidence shows persistent under-delivery.

2.12 Following adoption of the Plan, the five-year land supply will be assessed for decision-making purposes against the 2019 NPPF. This requires a 20% buffer where there has been significant under-delivery over the previous 3 years; and where there is not an up-to-date plan requirement (as is the case here) assesses delivery against the household projections (and from 2018 forwards against the standard method local housing need). Over the three-year period to 2018, the household projections indicate household growth of 1,982 households.¹ Set against this, net completions of 950 dwellings represents a delivery performance of 48%. As this falls well below an 85% threshold, using the recently published 2019 Framework approach, significant under-delivery exists and a 20% buffer would be warranted.

On the basis of the answer to Question 1, will there be a five-year housing land supply upon adoption of the Plan? 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?

2.13 We consider that the supply of deliverable sites has been over-stated. We would wish to make the following comments:

- The 10% non-implementation allowance for existing commitments is too low given the inclusion of a number of prior approvals in the committed supply.² This should be increased to at least 20%.
- In respect of CHIG.R7 we note that there is no current planning application, significant local objections exists, and the emerging neighbourhood plan proposes the designation of the site as local green space.
- We would question whether there is sufficient evidence to demonstrate that the large urban extensions to Harlow (SP 5.1 – 5.3) will contribute to delivery within the five-year period, given the lead-in time to develop strategic masterplans, submit planning applications, coordinate strategic infrastructure provision, appoint development partners and progress reserved matters

¹ Using household growth of 654, 661 and 667 for the three proceeding years based on MHCLG Household Projections as per the Housing Delivery Test Rulebook

² E.g. Sterling House and Howard Business Park.

applications etc. We note, for example, the risks associated with the delivery of M11 Junction 7a which would have a severe impact on delivery timescales.

- 2.14 In contrast to the sites at Harlow, the delivery of the Woolston Manor site is not contingent on significant upfront infrastructure and could contribute to delivery in the five-year period and beyond. The site benefits from exceptional sustainability credentials, it is highly accessible, and it is not in agricultural use - thereby making it sequentially-preferable to a number of draft allocated sites and all other omission sites.

APPENDIX 1: SITE LOCATION PLAN

