

Epping Forest District Council**Local Plan 2011 - 2033****Examination****Hearing Statement on behalf of Mr John Padfield (REF: 19LAD0069)****Matter 5: Site Selection Methodology and the Viability of Site Allocations****Introduction**

- 1.1 This statement has been prepared on behalf of Mr Padfield, in response to the Inspector's Questions for the following hearing session Matter 5: Site Selection Methodology and Viability of Site Allocations.
- 1.2 Submissions have been made at previous consultations on the draft Local Plan and this statement should be viewed in the context of previous comments. The proposals for the site have been discussed with officers at the Council.

Site Selection**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?

- 1.3 The Council has undertaken a robust analysis of sites, the SLAA provided the starting point for the site selection process and represents one of the inputs into the process and the EB805AJ states that the approach adopted in the SLAA in respect of filtering sites was reviewed for the Site Selection Methodology (SSM) to ensure that all potentially suitable sites were considered. This is also confirmed in Figure 5 page 22 of the Sustainability and Equalities impact Appraisal 2017 (EB204).

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

1.4 This is a question for the Council to answer but the establishment of the SSM is set out in detail in EB805AK and states at paragraph 1.1 and 1.2:

“This note explains the proposed methodology for identifying suitable sites for residential and employment development to meet identified needs, the most suitable of which will be selected and included as proposed site allocations in the Epping Forest District Local Plan (“the Local Plan”) – Draft Local Plan Consultation. A separate note addresses the methodology to be followed for identifying and selecting preferred sites allocations for traveller site development in the Local Plan. Stage 6 of this note has been updated following the Regulation 18 consultation and associated analysis of representations to outline the process that will be followed to identify proposed residential and employment site allocations in the Regulation 19 Pre-submission Local Plan. Sections 2 and 3 of this note along with Stages 1 to 5 of Section 4 remain unchanged from the version published in October 2016 as part of the Draft Local Plan consultation.

The site selection methodology (SSM) takes account of relevant government policy and practice guidance contained within the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG), respectively; together with the work undertaken by a number of other planning authorities at varying stages of plan making, including from adopted plans. The review of the methodology in February 2017 also took into account the proposed amendments to the NPPF identified in the Housing White Paper Fixing our broken housing market.”

1.5 It is contended that this detailed note (EB805AK) is robust.

c. What is the relationship between the SSM and the sequential approach to site selection set out in Policy SP2(A)?

1.6 Please refer to paragraph 1.17 below.

d. What was the role of the Sustainability Appraisal in selecting between the various sites?

1.7 The SSM (EB805AK) states that:

- The Council has identified three key stages during the plan making process where reasonable alternatives should be subject to Sustainability Appraisal (SA). These key stages are: (1) Districtwide spatial distribution alternatives (which is outside of the scope of the site selection process); (2) settlement-specific spatial distribution options; and (3) site options, which will be integrated into the SSM. (Further detail is provided in Section 4 (below)) (paragraph 3.3);
- Paragraph 4.46 states that the SA assessment, undertaken by AECOM, will establish the impact of the candidate Preferred Sites alone and in combination.
- Finally, at paragraph 4.91 the SSM states that for the 'Site Selection Work – Post Completion Work' that following conclusions of the site selection process, the Council will undertake further work to inform the Local Plan including:
 - A review of Green Belt boundaries to identify proposed amendments to the Green Belt boundary to accommodate the proposed site allocations;
 - SA and HRA, which will include, as necessary, assessment of the Tranche 2 sites in accordance with the relevant regulations.

e. Was any other evidence taken into account in the site selection process? In particular, how has the historic environment been taken into account? Have Historic Impact Assessments been undertaken as recommended by Historic England and, if not, is this necessary?

1.8 The Council has undertaken a number of assessments which, whilst not necessarily all site specific, underpin the site selection process. The SSM (EB805AK) states at paragraphs 3.6 to 3.11, that a number of the evidence base studies have been produced for the Council, which contain reference to and recommendations about how data should inform later stages of the planning making process including site selection, including, among others: The Level 1 Strategic Flood Risk Assessment 2015 (EB909); the Landscape Character Assessment 2010, and The Settlement Edge Landscape Sensitivity Study 2010 (EB712).

1.9 The assessments have informed the final site selected, the number of dwellings proposed and the scale and scope of infrastructure and facilities required to support development.

1.10 With regards to Historic Impact Assessments, the historic environment has been taken into account in the numerous evidence base and submission documents including:

- The Epping Forest Historic Environment Characterisation Study (EB900);

- The Heritage Asset Review (EB902);
- The SLAA 2016 (EB800) which identifies in its methodology chapter and in paragraphs 4.3 that the purpose of the initial site filtering was to ensure that sites which would have no potential for coming forward for strategic housing development were excluded at an early stage and that were applied including, inter alia, sites which are wholly constrained by an international or national designation are filtered, including heritage designations such as Listed Buildings, Scheduled Ancient Monuments or Historic Parks & Gardens. This is reflected in the Site Appraisal for each site, 40 factors were considered important in determining whether a site should be considered as suitable including national heritage assets including Listed Buildings, Scheduled Ancient Monuments and Historic Parks & Gardens
- The Site Selection Report 2016 (EB801), considered the historic environment, for example the Stage 2 Assessment tables (EB801F) confirms the criterion assessment includes impact on Scheduled Ancient Monument / Listed Building / Conservation Area / Historic Park or Garden and impact on Archaeology;
- Site Selection Report 2018 (EB805), considered the historic environment for example in (EB805AK) Site Selection Methodology for Stages 2 and 6.2 of the site selection as set out in Appendix A states that criterion 1.8 is ‘impact on Scheduled Ancient Monument, Listed Building, Conservation Area, Historic Park or Garden’;
- The Settlement Edge Landscape Sensitivity Study (EB712) considers and assessed the historic environment in its historic character and designated environmental constraints sections for each statement e.g. on page 22 to 24;
- The Sustainability Appraisals of the Local Plan (EB202, EB203, and EB204)
- The Green Belt Review Stage 1 2015 (EB704A) considers the historic environment albeit in the wider sense with regards to the Purpose 4 of the Green Belt purposes as defined in the NPPF i.e. ‘to preserve the setting and special character of historic towns’
- The Green Belt Review Assessment Stage 2 2016 (EB705A) considers the historic environment albeit in the wider sense with regards to the Purpose 4 of the Green Belt purposes as defined in the NPPF i.e. ‘to preserve the setting and special character of historic towns’

1.11 Furthermore, draft policies Policy DM 7 (Heritage Assets) and DM 8 (Heritage at Risk) refer directly to the need for development proposals to conserve or enhance the historic environment and the requirements of draft Policy SP3 (Place Shaping) which is to be read in conjunction with these policies would ensure the master planning of the Epping South allocation would have regard to the character, appearance and/or setting of heritage assets.

2. How were the conclusions reached about individual sites checked for accuracy and consistency? Were sites visited or were they assessed through a desktop 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).

1.12 It is submitted that the conclusions in the Evidence Base documents relating to Site EPP.R1 site are consistent and accurate. The site has been discussed on numerous occasions with officers at the Council.

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?

1.13 The subject site, allocated site EPP.R1, has consistently been allocated for development in the development plan and consistently identified as being suitable for development in its evidence base, this is set out as follows:

1. In the Epping Forest District Draft Local Plan Consultation Version (October 2016 (EB123) the site is allocated in Draft Policy P 1 (Epping) for residential development as sites:
 - i) SR-0069 (land at Ivy Chimneys Road) – approximately 79 homes;
 - ii) SR-0069/33 (land South of Epping) – approximately 255 homes; and
 - ix) SR-0333Bi (Epping south-west area) – approximately 24 homes,
2. In the Epping Forest Submission Version (EB114) the site is allocated as site EPP.R1 Land South of Epping, West – Approximately 450 homes;
3. The SLAA 2016 (EB800) identifies the site as a site ‘suitable outside current policy (Green Belt)’ and ‘available, achievable and deliverable’ (Appendix 5 and EB800A);
4. The Site Selection Report 2016 (EB801) in Appendix B1.6.5 Results of identifying sites for allocation (EB801M) confirms that the site is proposed for allocation (sites SR-0069, SR-0069/33, SR-0333Bi, SR-0445);
5. The Site Selection Report 2018 (EB805) confirms, the site is proposed for allocation (sites SR-0069, SR-0069/33, SR-0333Bi, SR-0445) (at Appendix B1.6.6 (EB805P);

6. The Settlement Edge Landscape Sensitivity Study (EB712) considers that South Epping (Landscape Setting Area 4) in which the site is located has a low overall sensitive to change may be suitable for development in landscape terms and is considered to have a less significant role in contributing to the structure, character and setting of the settlement (paragraph 2.6.1);
7. The Sustainability Appraisal (EB204) in paragraph 7.44 which states *“The results from the technical assessments of alternatives set out above, together with analysis of the Draft Local Plan consultation feedback and the updated evidence base, fed into the Council’s preferred approach and led to the following: - Less growth overall in Epping but higher growth in the South of the settlement, to reduce impacts on traffic congestion and air quality on Epping Forest. Focus on non-urban brownfield sites to the south of the settlement to ensure greater alignment with the emerging Epping Neighbourhood Plan that reflects local aspirations for a greater level of growth in the South of the settlement...”*

1.14 Furthermore the Epping Neighbourhood Plan ‘Draft for Consultation’ (May 2018) allocates the site as follows (page 15):

“POLICY 5 ‘South Epping’ is a ‘sustainable urban extension’ located on land to the south of Ivy Chimneys Road / Bridge Hill / Brook Road to provide residential development supported by a school, GP surgery and pharmacy, local centre, a bus stop on a route connecting with Epping town centre, and public open spaces, with advance connecting road infrastructure. The location and extent of ‘South Epping’ plus indicative infrastructure are shown on Map 1. South Epping is expected to in excess of 800 homes with a mix of dwelling types and sizes. The range of affordable housing provided within South Epping alongside the required infrastructure provision would be the subject of negotiation with developer(s) and Essex CC as Highway Authority.”

4. Having regard to Question 1c above, 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))?

5. Now that the site selection process is complete for the purpose of making allocations in the Plan, is it necessary to include the sequential approach within Policy SP2(A)?

1.15 It is contended that it is not necessary to include the sequential approach within Policy SP2(A). It is clear that the SMM applied a sequential approach to identify candidate preferred sites (Stage 3). This is set out in paragraphs 4.26 to 4.27 of EB805AK. It is considered that the sequential approach

to site selection has already been undertaken and therefore it is not necessary to include it within the policy. It is suggested that criteria ii to vii in Policy SP2(A) be removed.

Viability Issue 4: At the broad strategic level, are the Plan's allocations financially viable?

- 1. Having regard to paragraph 173 of the NPPF, are the Plan's allocations for housing (including for Travellers) and employment financially viable, having regard to the normal cost of development and mitigation; and all relevant policy costs, including for affordable housing, space standards, building requirements, design and potential infrastructure contributions?**

1.16 At the broad strategic level, EFDC appointed Dixon Searle Partnership to provide development viability advice and evidence in support of the Local Plan process (EB300, EB300A-D, EB301, EB301A-E) and the Council have taken this into account as part of their evidence base in preparing the Local Plan.