

**EXAMINATION IN PUBLIC OF THE EPPING FOREST DISTRICT LOCAL PLAN
HEARING STATEMENT**

21 February 2019

MATTER 6 – HOUSING SUPPLY, INCLUDING SOURCES OF SUPPLY; HOUSING
TRAJECTORY AND 5 YEAR HOUSING LAND SUPPLY
ELYSIAN RESIDENCES
REPRESENTOR 19LAD0094

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?

Point 4: In determining the contribution of allocated sites to the housing land supply, how have site densities been worked out?

1. Elysian Residences contends that it is not clear how the density of draft site allocations has been calculated. With particular regard to draft allocation ref. LOU.R14, Elysian Residences suggests that the capacity of the site has been under-estimated, having particular regard to the following:
 - The Site's location approximately 200m from Loughton town centre and Loughton London Underground station.
 - The site comprises brownfield land and benefits from a unique 'transitional' condition along Alderton Hill between municipal scale buildings that lie between the site and Loughton town centre and the more residential character heading east away from the town.
 - The site backs onto the London Underground Central Line; it does not back onto other residences or gardens, and would not be considered to represent infill or 'back garden' development between rows of houses.
 - The pressing need to deliver housing, particularly having regard to the Council's inability to demonstrate a 5 year housing land supply, as stated in the Council's January 2019 Housing Implementation Strategy Update.

2. Elysian Residences also contends that the site has potential to accommodate one or more types of residential accommodation (e.g. Use Class C2 extra care or nursing home elderly people's

housing, and/or Class C3 residential, dwellings) given its accessible location. Of particular importance, having regard to the Council's identified inability to demonstrate a 5 year housing land supply, is the potential for Class C2 development on the site to free up other local housing stock through elderly people relocating from larger, under-occupied properties in the area, helping to relieve pressure on housing delivery in the District.

3. However, the draft site allocation does not consider such alternative uses, nor is sufficient consideration given to the ability of different types of elderly care accommodation (i.e. Class C2 land uses) to contribute to meeting objectively assessed housing needs in the evidence base that supports the draft Local Plan. For instance, reference is made to the importance of elderly care accommodation and the aging population in the District at Section 7 of the December 2017 Housing Implementation Strategy ('HIS'), but no further reference is made to the potential contribution such accommodation can make to meeting projected needs in the HIS or draft Local Plan policies. Indeed, Class C2 units are excluded altogether from housing delivery figures in the table on page 5 of the Council's January 2019 HIS Update without explanation as to why.
4. There should be greater emphasis on, and recognition of, the role such types of accommodation can play in helping to deliver new housing options, free up existing stock and deliver wider social-economic benefits such as employment generation and reduced pressure on the National Health Service ('NHS'), to provide the best opportunity to achieve the draft Local Plan's objectives and wider aspirations. Such an approach would also accord with the NPPF's provisions for local planning authorities to positively seek opportunities to meet the needs of their area and to meet objectively assessed needs (NPPF, paragraph 14).

End.

DP9 Ltd

21st February 2019