

For and on behalf of  
**Peer Group PLC**

**Epping Forest Local Plan Examination**  
Response to MIQ's Matter 6: Housing Supply, including Sources of  
Supply; the Housing Trajectory; and the Five Year Supply

**The Ongar Park Estate  
North Weald Bassett**

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## 1.0 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?

1. 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? If so, should the table be updated to reflect this? Should the table indicate how much housing is expected to be provided through allocations outside the Garden Communities? Should it be made clear whether the total housing supply for the Plan period will be above or below the requirement?
  2. 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?
  3. Is the expected windfall allowance of 35 dwellings per annum for 11 years (385 in total) justified? Representations suggest that the figure might be either higher or lower.
  4. 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?
- 1.1 The Council's trajectory will be used as the basis for calculating the revised housing land supply position of the District using the housing requirement identified by Epping Forest District Council in their emerging Local Plan of 11,400 dwellings across the plan period to 2033 or 518 dwellings per annum.
  - 1.2 SPRU have combined Appendix 3 and Appendix 4 of the Council's Housing Implementation Strategy (2017) into one trajectory, which we consider to be the Council's position of land supply. We have then used this as a starting point to assess the Council's supply of housing land. This provides an overall total supply to 2033 of 11,827 dwellings (excluding completions from 2011 to date which provides an overall total of 13,157 dwellings to 2033).
  - 1.3 Within the Council's trajectory there are also a number of sites which have either been double counted or sites with planning permission that has expired, erroneously in the trajectory. These are listed in Appendix A of this document. It is important to note that there may be more double counting than those sites outlined in Appendix A. The Council should undertake a thorough assessment of their land supply to rule out any further instances of double counting or sites with expired consents.
  - 1.4 **In terms of the plan period supply, adjustments made by SPRU identify a supply of 10,229 dwellings to 2033 (a reduction of 1,598 dwellings from the Council's anticipated figure of 11,827<sup>1</sup>.)**
  - 1.5 This shows that there is **a shortfall in supply of 1,171 dwellings** over the plan period.

<sup>1</sup> The Council's supply figure of 13,157 dwellings includes 1,330 completions between 2011 and 2017, and this has been deducted from the projected supply to calculate the target for the remainder of the plan period of 11,827 dwellings

## 2.0 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 AS REQUIRED BY PARAGRAPH 47 OF THE NPPF?

1. 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 The table below compares the policy position with delivery over the last 6 years. This suggests that there has been a **shortfall of -1,778 dwellings** since the start of the plan period in 2011. In the years since 2011, only 43% of the requirement has been delivered.

2.2 It is clear the Council have a poor record of delivery, and further to this, it has taken ten years to bring forward a new Plan since the East of England Plan was adopted in 2008.

2.3 It has been over 10 years since the council last produced a plan (the Combined Policies of Epping Forest District Local Plan (1998) And Alterations (2006) Published February 2008).

2.4 The recent published Housing Delivery Test HDT and in terms of delivery EFDC is 303<sup>rd</sup> out of 316 LPA's having only delivered 49% of its requirement and as such it will need to apply a 20% buffer to its housing land supply calculations.

**Table 1. Comparison of Completion Rates Against Policy Requirements**

Year	Net Completions	Requirement	Difference	% of Target Delivered
2011/12	288	518	-230	56%
2012/13	89	518	-429	17%
2013/14	299	518	-219	58%
2014/15	230	518	-288	44%
2015/16	267	518	-251	52%
2016/17	157	518	-361	30%
<b>Total</b>	<b>1,330</b>	<b>3,108</b>	<b>-1,778</b>	<b>43%</b>

2.5 The council are acting contrary to Government guidance in applying the "Liverpool" approach to deal with the backlog of delivery. In assessing five year land supply the "Sedgefield" method of dealing with the backlog in the first five years must be used in these circumstances otherwise the submitted plan fails the Duty to Cooperate.

2.6 The Government guidance is clear that shortfall should be dealt with in the first five

years. Paragraph: 035 Reference ID: 3-035-20140306 states that local planning authorities should aim to deal with any undersupply within the first five years of the plan period where possible. Where it is not possible to address the shortfall within the first five years then the guidance requires that the Council approach neighbouring authorities though the Duty to Cooperate to establish if they could assist in meeting this shortfall in the next five years.

- 2.7 There is no evidence that the Council have sought to approach the neighbouring authorities on this basis as such there is no justification under this guidance for the adoption of the “Liverpool” approach i.e. meeting what is a substantial shortfall over the whole plan period.
- 2.8 Further the fact that the Council cannot meet its shortfall early in the plan period is a direct result of the Council’s choice of site allocations. There is clear evidence that there are suitable, available and deliverable sites which have been omitted from the plan, including the Peer Group site at North Weald Bassett which could be delivered within the first five year Plan period. This is a policy choice and cannot be used to justify not meeting the Council’s housing needs in the short term.

**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?**

- 2.9 In accordance with the Framework, local authorities need to apply an additional buffer of 5% applied to ensure choice and competition in the market for land. However, where there has been a record of persistent under-delivery of housing, local authorities should increase the buffer to their requirement to 20%.
- 2.10 The data in Table 1 shows that the Council have a poor record of housing delivery. Table 1 shows that there has been **a shortfall of -1,778 dwellings** since the start of the plan period in 2011. Table 1 highlights that the Council has failed to meet the target set since the start of the plan period in 2011. In the years since 2011, only 43% of the requirement has been delivered.
- 2.11 Going back further, the development plans for the period since 2001, for which we have the data, are summarised below:
- Essex and Southend-on-Sea Structure Plan (Adopted 2001) required the provision of 2,400 dwellings for the period 1996-2011, or 160dpa (Policy H1);
  - East of England Plan (Adopted 2008) requires the provision of 3,500 dwellings for the period 2001-2021 or 175 dwellings per annum (Policy H1);
  - Emerging Local Plan requires the provision of 11,400 dwellings for the period 2011-2033 or 518 dwellings per annum (paragraph 2.59).
- 2.12 It is clear the Council have a poor record of delivery. Therefore, a buffer of 20% is considered appropriate in accordance with Paragraph 47 of the Framework.
- 2.13 When moving from a 5% to a 20% buffer, on the Council’s land supply position, they would not be able to demonstrate a 5 year supply of housing.

**Conclusion of 5 Year Requirement**

- 2.14 Taking the above issues into account, this results in a five-year requirement for 5,242 dwellings, as shown in Table 2 below.

**Table 2. SPRU's Revised Supply with Council's SHMA OAN and Sedgfield Method**

	No. of Dwellings
Requirement for housing for plan period	11,400
5 year supply requirement (518dpa x 5)	2,590
shortfall (since 2011)	1,778
ADD TO 5 YEAR SUPPLY	4,368
5 year supply requirement including 20% buffer	5,241.6

2. On the basis of the answer to Question 1, will there be a five-year housing land supply upon adoption of the Plan? What evidence is there to support this? Can the Council produce a spreadsheet to show how individual sites are expected to contribute to delivery in each year?

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?

2.15 No, the evidence shows that this is not realistic. SPRU have undertaken an assessment of lead-in times between the date on which a site first obtained planning permission to the year the first completion was recorded on site as recorded in the AMRs. It is of note that there are very few outline applications contained in the published AMRs that have delivered completions to run this exercise.

2.16 This analysis of local lead-in times (the time between the approval of the application to the first completion on site) shows the following:

**Table 3. Summary of Lead-In Times by Application Type for Epping Forest Council**

Lead-In Times by Type of Application	Average No. of Months (Years)
Outline Planning Permission	86 months (7 years)
Full Planning Permission	50 months (4.0 years)
<b>Average</b>	<b>68 months (5.5 years)</b>

2.17 The average lead-in time in the Epping Forest District from grant of planning permission through to first completion on site is currently averaging approximately 5.5 years.

2.18 SPRU have also run this exercise for neighbouring authorities Uttlesford and East Herts. This analysis is summarised in the table below. The average lead-in time for all three authorities is **2.91 years** for full planning applications, and **4.43 years** for outline planning applications. This is broadly in line with national evidence on lead-in times (by comparison, Savills suggest a period of 4.3 years from submission of outline planning application to completing site preparation).

2.19 This problem will be compounded by the site allocations proposed by the Council. It is selecting sites in North Weald Bassett which are remote from the settlement edge such that delivery will be dependant on infrastructure. The Peer Group site is immediately adjacent to the settlement edge and could be delivered early in the Plan period, but it has not been allocated for reasons that appear to be political rather than planning.



**Table 4. Summary of Lead-In Times by Application Type for East Herts and Uttlesford Council's**

Lead-In Times by Type of Application	Average No. of Years)
Outline Planning Permission (East Herts)	2.88 years
Full Planning Permission (East Herts)	1.73 years
Outline Planning Permission (Uttlesford)	3.4 years
Full Planning Permission (Uttlesford)	3 years
<b>Average</b>	<b>2.75 years</b>

2.20 SPRU have undertaken an assessment of Epping Forest's five year land supply (See Appendix A for the full assessment). This has identified a number of issues with the Council's assessments:

- Referencing of sites (the reference in the trajectory of the New Garden Town Communities compared with the references in the emerging Local Plan);
- Referencing of Harlow extension site capacity (mixing up the capacity of Latton Priory and East of Harlow);
- Double counting of 13 sites;
- Site Capacities in the Local Plan do not match what sites have permissions for (some are lower, some are higher) i.e. CHIG.R2 has planning permission for 25 retirement living apartments and erection of a 72-bed care home, but is recorded in the trajectory as 23 dwellings.

2.21 This raises issues with the overall robustness of the assessment carried out by the Council. In summary the adjustments required to reflect government guidance and the available local and national evidence on lead in times and delivery result in there being a significant shortfall in the five year land supply at the date of adoption.

2.22 Appendix A sets out the findings for individual sites. In summary, the contested sites are:

- New Garden Town Communities (Latton Priory, Water Lane Area and East of Harlow)- a reduction of **-1,324 dwellings** from the plan period;
- BUCK.R1; Land at Powell Road- a reduction of **-16 dwellings** from the five year supply;
- BUCK.R2; Land at Queens Road Car Park- a reduction of **-41 dwellings** from the five year supply;
- CHIG.R7; Land at Chigwell Convent- a reduction of **-28 dwellings** from the five year supply period;
- ONG.R1; Land West of Ongar- a reduction of **-19 dwellings** from the five year supply period;
- ONG.R2 Land at Bowes Field- a reduction of **-15 dwellings** from the five year supply period;
- NAZE.R1; Land at Perry Hill- a reduction of **-17 dwellings** from the five year supply period
- NAZE.R3; Land to the Rear of Pound Close- a reduction of **-20 dwellings** from the five year supply period;
- NAZE.R4; Land at St Leonards Farm- a reduction of **-11 dwellings** from the five year supply period;
- NWB.R5; Land at the Acorns, Chase Farm- a reduction of **-51 dwellings** from the five year supply period;



- THOR.R2; Land East of High Road- a reduction of **-40 dwellings** from the five year supply period.

2.23 There are also a number of sites which have either been double counted or sites with planning permission that have expired, erroneously in the trajectory. These are listed in Appendix A. It is important to note that there may be more double counting than those sites outlined above. The Council should undertake a thorough assessment of their land supply to rule out any further instances of double counting or sites with expired consents.

**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?**

2.24 No, it is entirely unrealistic to assume that these three sites will deliver any completions in the five year period to 2022.

2.25 The spatial strategy contained within the Draft Local Plan includes the provision of three new Garden Communities with the intention of delivering 3,900 new homes by 2033:

- 1) Latton Priory (approximately 1,050 homes by 2033);
- 2) Water Lane Area (approximately 2,100 homes by 2033);
- 3) East of Harlow (approximately 750 homes by 2033).

2.26 The Draft Local Plan states that all three Garden Town Communities will deliver and be fully completed by the end of the plan period. The Council consider that two sites (Water Lane Area and East of Harlow) will contribute to the five-year supply period (2017-2022).

2.27 Expressions of Interest to developers were sought in October 2016 by East Herts Council, Epping Forest District Council and Harlow Council for Harlow and Gilston Garden Town, a larger area which these three sites sit within. There is no evidence of the outcome of this exercise and there is yet to be any evidence of any developers with interest in the site. Latton Priory is being promoted by Hallam Land but has yet to be sold to a developer.

2.28 The bidding proforma outlines that the first applications are expected late-2018. Given the scale of these sites, one would expect at least an EIA scoping request to have been made to the Council.

2.29 An annual rate of delivery of 83 dwellings has been applied to each of these site in line with the local research on delivery rates. The average lead-in times for these sites will likely be a minimum of 4 years from the date of first receiving planning permission.

2.30 Considering none of these proposed garden town communities have either planning permission of a planning application lodged, it is unrealistic that these three sites will deliver any completions in the five year period to 2022. A masterplan (which conforms to the Council's expectations) is required to be prepared prior to the submission of any application and there is yet to be any evidence of these having been prepared. This is likely to add a delay to the usual lead-in times, as well as the cross-boundary collaboration required between Harlow, Epping Forest and East Herts which have been factored into SPRU's assumptions. These sites will require extensive amounts of infrastructure to support the development. SPRU have updated the trajectory to reflect this position, as shown in Table 5 below.

**Table 5. Summary of Difference for New Garden Town Settlements**

	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	Total	Outside Plan Period
Latton Priory (EFDC)	0	0	0	0	50	100	100	100	100	100	100	100	100	100	100		1050	-
Latton Priory (SPRU)	0	0	0	0	0	83	83	83	83	83	83	83	83	83	83	83	913	137
Water Lane Area (EFDC)	0	0	0	0	100	200	200	200	200	200	200	200	200	200	200		2100	-
Water Lane Area (SPU)	0	0	0	0	0	83	83	83	83	83	83	83	83	83	83	83	813	1187
East of Harlow (EFDC)	0	0	0	0	0	50	100	100	100	100	100	100	100				750	-
East of Harlow (SPRU)	0	0	0	0	0	83	83	83	83	83	83	83	83	83	3		750	
<b>Difference</b>																	<b>-150</b>	

- 2.31 It is highly unlikely that any of the Garden Town Communities will deliver the number of dwellings anticipated in the emerging Local Plan. This has resulted in a reduction of - **150 dwellings** from the five year supply period and **-1,324 dwellings** from the total plan period supply.

#### **Overall Conclusions on Five Year Housing Land Supply**

- 2.32 Drawing on the above information, we have reassessed the five year housing land supply for Epping Forest. We have deducted 464 dwellings from the five year supply period. This reduction and the application of the correct approach to dealing with the existing shortfall in the first five years of the plan result in a likely level of housing supply at the time of adoption of just **2.88 years supply**.

**Table 6. SPRU's Revised Supply with Council's SHMA OAN and Sedgefield Method**

	No. of Dwellings
Requirement for housing for plan period	11,400
5 year supply requirement (518dpa x 5)	2,590
shortfall (since 2011)	1,778
ADD TO 5 YEAR SUPPLY	4,368
5 year supply requirement including 20% buffer	5,241.6
Annual supply required	1,048.32
Supply	3,022
<b>5 year housing land supply position</b>	<b>2.88</b>

- 2.33 The submitted plan will not provide for a five years supply of housing land at the time of

adoption. This is the case even if the “Liverpool” approach is used and this is due to the nature of the sites selected by the Council and the fact that they have made unrealistic assumptions regarding lead in times and delivery rates without any reference to local or national evidence. The Council approach, unlike this report, is not supported by any credible assessment of the local or national evidence and is therefore unsound in the context of the tests of soundness in the Framework.

2.34 In terms of housing land supply, the conclusion is that the submitted plan is unsound.

**3.0 ISSUE 3: DOES THE PLAN MEET THE REQUIREMENTS OF PARAGRAPH 10 OF THE PLANNING POLICY FOR TRAVELLER SITES (PPTS) IN RESPECT OF DELIVERY?**

**1. Is the plan consistent with paragraph 10 part a) of the PPTS? What is the five year requirement for the delivery of Traveller sites and will this be achieved upon adoption?**

**3.1** No further comment.

## APPENDIX A – REVISED HOUSING TRAJECTORY

### i) Housing Allocations

#### **BUCK.R1- Land at Powell Road**

	2017/18	2018/19	2019/20	2020/21	2021/22	Total
EFDC	0	0	0	15	16	31
SPRU	0	0	0	0	15	15
<b>Difference</b>						<b>-16</b>

A1.1 SPRU do not dispute the rate at which the site will deliver. This site has had two previous applications for assisted living accommodation under references EPF/3021/15 and EPF/2925/14. These applications were for 57 assisted living units for the elderly. The first application was withdrawn, and the second application was refused on the grounds that the site lies within the Green Belt and would be an inappropriately dominant development which fails to provide affordable housing. It is reasonable to assume that until the Local Plan has been adopted and the site has been removed from the Green Belt, it is unrealistic that planning permission will be granted. The adoption of the Local Plan is currently anticipated for autumn 2019 and therefore we have moved on the first year of anticipated completions by one year to account for this.

A1.2 This results in a reduction of **-31 dwellings** from the five year supply period.

#### **BUCK.R2- Queens Road Car Park**

	2017/18	2018/19	2019/20	2020/21	2021/22	Total
EFDC	0	0	0	20	21	41
SPRU	0	0	0	0	0	0
<b>Difference</b>						<b>-41</b>

A1.3 SPRU do not dispute the rate at which the site will deliver, but rather the year the site will begin to deliver completions. The site is currently in operation as a car park run by Epping Forest District Council and is within 100m of Buckhurst Hill underground station. There is no planning permission on the site and there are no planning applications lodged. Applying the standard lead-in rates and considering the site is still in operation as a car park, would suggest it is more realistic that completions will be delivered on site in the year 2022/23.

A1.4 It is understood that the site is owned by Transport for London. There is no evidence that this site is available for development, furthermore, there is no evidence that the current car park is no longer required. Given its location, it would seem reasonable to think it is used by commuters. There is no car park rationalisation strategy by the Council, available on the evidence base list, which may explain the Council's approach to losing car parking spaces close to transport hubs.

A1.5 This results in a reduction of **-41 dwellings** from the five year supply.

**CHIG.R7 Land at Chigwell Convent**

	2017/18	2018/19	2019/20	2020/21	2021/22	Total
EFDC	0	0	0	14	14	28
SPRU	0	0	0	0	0	0
<b>Difference</b>						<b>-28</b>

A1.6 The site has no planning permission or a planning application lodged. The emerging plan also requires a masterplan to be produced to “enable the regeneration of the site and to ensure that development proposals are ‘front-loaded’, recognising the scale and complexity of delivering communities”. There is no evidence that this has been prepared at January 2018.

A1.7 Allowing for a lead-in time for submission of a planning application to first completions on the site of 4 years, results in completions likely to commence from the year 2022/23. This results in a reduction of **-28 dwellings** from the five year supply period.

**ONG.R1 Land West of Ongar and ONG.R2 Land at Bowes Field**

	2017/18	2018/19	2019/20	2020/21	2021/22	Total
EFDC (ONG.R1)	0	0	0	0	19	19
SPRU (ONG.R1)	0	0	0	0	0	0
EFDC (ONG.R2)	0	0	0	0	15	15
SPRU (ONG.R2)	0	0	0	0	0	0
<b>Difference</b>						<b>-34</b>

A1.8 These two proposed housing allocations do not benefit from an extant planning permission and does not have an application currently lodged. The emerging Local Plan requires sites ONG.R1 and ONG.R2 to be developed in accordance with the Concept Framework Plans. Policy P4 of the Emerging Local Plan states that these relate to a number of sites which should be undertaken jointly between these two applicants of the site allocation subject to the Concept Framework Plan and shall be produced by the applications prior to the submission of any planning applications. This is likely to add a delay to the delivery of the site which, in combination with the planning status of the site, would make it unrealistic to expect completions in the five year period. We do not dispute the rate of delivery anticipated by the Council.

**NAZE.R1 Land at Perry Hill, NAZE.R3 Land to the Rear of Pound Close and NAZE.R4 Land at St Leonards Farm**

	2017/18	2018/19	2019/20	2020/21	2021/22	Total
EFDC (NAZE.R1)	0	0	0	16	17	33
SPRU (NAZE.R1)	0	0	0	0	16	16
EFDC (NAZE.R3)	0	0	0	19	20	39
SPRU (NAZE.R3)	0	0	0	0	19	19
EFDC (NAZE.R4)	0	0	0	10	11	21
SPRU (NAZE.R4)	0	0	0	0	10	10
<b>Difference</b>						<b>-48</b>

- A1.9 These three sites do not benefit from planning permission and currently lies within the Green Belt. NAZE.R1 has been subject to four previous applications for residential development on the site, two of which have been withdrawn (EPF/0202/14 and EPF/2880/16) and two refusals on the basis of its location in the Green Belt (EPF/2009/15 and EPF/0937/16). These applications comprised NAZE.R1 and additional land to the east of the proposed housing allocation.
- A1.10 The site also lies within the South Nazeing Concept Framework Plan Area which requires all relevant allocated sites to produce a Concept Framework prior to the submission of any applications. In relation to South Nazeing this relates to NAZE.R1, NAZE.R3 and NAZE.R4. This is likely to delay these sites from coming forward. NAZE.R1, NAZE.R3 and NAZE.R4 are all currently located within the Green Belt.
- A1.11 In order to allow for these sites to be released from the Green Belt and a planning application considered, the first year of anticipated completions has been moved on one year. This results in a reduction of **-48 dwellings** from the five year supply period.

**NWB.R5 Land at the Acorns, Chase Farm**

	2017/18	2018/19	2019/20	2020/21	2021/22	Total
EFDC	0	0	0	25	26	51
SPRU	0	0	0	0	0	0
<b>Difference</b>						<b>-51</b>

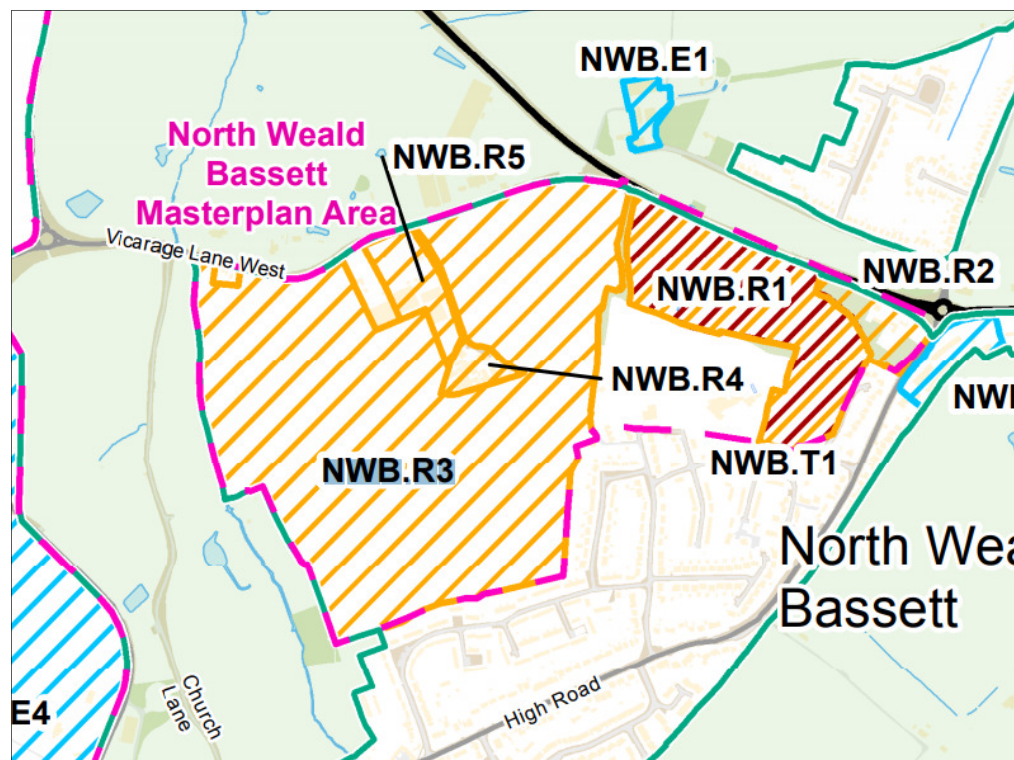
- A1.12 The site is required to comply with a strategic masterplan for the North Weald Bassett Area which will be formally endorsed by the Council. The site is surrounded on three sides by proposed housing allocations NWB.R3 and NWB.R4. NWB.R3 abuts the residential area (see figure 1 below), but NWB.R5 in its current form is surrounded by farmland. It would not make sense for this site to come forward ahead of NWB.R3 and NWB.R4 as currently anticipated by the Council.
- A1.13 It is unclear from the evidence base whether access to the site will be provided for by NWB.R5 to NWB.R3 to provide the justification for NWB.R5 coming forward first, but the site selection assessment suggests that NWB.R3 has its own separate access point on Vicarage Lane West.
- A1.14 The site is also currently allocated as Green Belt so realistically will not come forward



for development until it has been released.

- A1.15 As such SPRU have pushed back the site to start delivering in the same year as NWB.R3 as well as accounting for the site's current Green Belt allocation.

**Figure 1. Map showing Cluster of Sites in North Weald Bassett**



**THOR.R2 Land East of High Road**

	2017/18	2018/19	2019/20	2020/21	2021/22	Total
EFDC	0	0	8	20	20	48
SPRU	0	0	0	0	8	8
<b>Difference</b>						<b>-40</b>

- A1.16 The site does not have an extent planning permission and there are currently no planning applications lodged and the site is currently located in the Green Belt, yet the Council consider the site capable of delivering completions in the year 2019/20.
- A1.17 As such, SPRU consider it unrealistic for completions to be delivered before the adoption of the Local Plan anticipated for Autumn 2019 when considering the site's designation in the Green Belt. For these reasons, it is considered more realistic for the site to deliver completions in the year 2021/22 allowing for a period of two years from the anticipated date of adoption of the Local Plan to obtain planning permission and the first dwelling to be completed.

**ii) Sites with Planning Permission**

- A1.18 From our assessment we have identified several sites within the trajectory which appear to have been double counted. These are either entered twice with the same reference number for the same capacity, or have been recorded twice where a more recent application has replaced the original and both have been included in the trajectory.

These are outlined in the following paragraphs.

- A1.19 Those sites which have been double counted are highlighted in yellow. We have left both entries in the table but removed the figures from the relevant row for clarity.

**188-194 High Road, Loughton**

- A1.20 The site acquired prior approval for 12 residential units in October 2015 under reference EPF/2398/15. A new application was then submitted in 2016 for the change of use of the property and rear extension to create 14 residential units under reference EPF/1245/16 and was approved in July 2016.
- A1.21 The planning statement submitted under EPF/1245/16 confirms that *“as the scheme had already acquired prior approval for 12 residential units there were no outstanding issues with regards to the principle of development”*.
- A1.22 Therefore, SPRU have removed **-12 dwellings** from the supply period to reflect this double counting.

**2 & 3 Sewardstone Road, Waltham Abbey**

- A1.23 The site is entered twice under references EPF/0454/16 and EPF/0396/16, both for 9 dwellings. The latter of the two is a prior notification application for the change of use of the property to 9 flats. EPF/0454/16 relates to a site on Station Road in Sheering and has already been counted in the supply. There is only 1 application for residential development at the site and as such, **-9 dwellings** have been removed from the supply period.

**25 Forest Avenue, Chigwell**

- A1.24 This site is entered twice for 1 dwelling, both with the same planning application number. There are two applications on the site for 1 residential unit under references EPF/1419/14 and EPF/1035/17, both approved. The most recent application is described in the officer report as *“effectively an amendment to the previous approved scheme which showed the dwelling attached”*. This revised application proposed a detached dwelling rather than the previously approved semi-detached dwelling. As such, **-1 dwelling** has been removed from the supply.

**61 North Street, Nazeing**

- A1.25 This site is entered twice and with the same reference number for both with delivery anticipated in years 1 and 3 respectively. The application under reference EPF/0563/16 is for the conversion and subdivision of an existing detached dwelling to create 2 dwellings. There are no further applications at the site address for any other residential development. As such, SPRU have removed **-1 dwelling** from the supply to reflect this double counting.

**Canes Farm, Hastingwood, North Weald Bassett**

- A1.26 There are two entries for this site under application references EPF/1120/14 and EPF/2639/16. The first application is for the demolition of two former barns and construction of one detached dwelling and approved in July 2014. The second, and more recent application, was approved in November 2016 for the demolition of two barns and creation of 1 pair of semi-detached houses and 1 detached house.
- A1.27 The Design and Access Statement submitted under EPF/2639/14 states that “A previous

planning permission, which is still current, of 1st August 2014 under reference EPF/1120/14 granted consent for the removal of these buildings and replacement with 1 large detached house, however it was felt that this was not appropriate in this location and there is more of a need for smaller units and therefore 3 smaller dwellings are preferred to 1 larger unit.”

A1.28 As such, SPRU have removed **-1 dwelling** from the supply.

***Danbury, Lippitts Hill***

A1.29 This site is entered twice under application references EPF/0947/16 and EPF/2804/14 for 3 dwellings deliverable in year 3. The first application (EPF/2804/14) was for the change of use and conversion of outbuildings to form three residential units and was approved in December 2014. The application under reference EPF/0947/16 is for the demolition of existing outbuildings and construction of 3 bungalows.

A1.30 The Officer's Report for the application under reference EPF/0947 states that *“consent has previously been granted for the change of use of these stables into three one bed dwellings. The only difference between this scheme and that previously granted consent is that the dwellings would now be new buildings to replace the stables rather than conversions”*.

A1.31 For these reasons, **-3 dwellings** have been removed from the supply.

***Land and Garages adjacent 97 Queensway***

A1.32 This site is entered twice under the same application reference number EPF/0212/16 for 4 dwellings delivered in year 3 and 1&2 respectively.

A1.33 The site has only been subject to one planning application and, therefore, **-4 dwellings** have been removed from the supply.

***Poppy's Café, 309-311 High Street***

A1.34 This site has been entered twice under planning application reference EPF/0623/16 for two dwellings, the first entry expects 2 dwellings to be delivered in year 1, and the second entry in year 3.

A1.35 There are two applications relevant to this scheme, the first being the full planning application and the second being listed building consent. As such, **-2 dwellings** have been removed from the supply.

***Stone Hall Farm, Downhall Road, Matching Green***

A1.36 Once again, this site is entered twice into the housing trajectory under planning application references EPF/2494/13 and EPF/1349/15 for 6 and 9 houses respectively. Application EPF/1349/15 states in the officer report that “this development only proposed 3 additional residential units, over the previous consent and removed a significant amount of business traffic”.

A1.37 As such, and counting the most recent application of **-9 dwellings** in the supply, a further six dwellings have been removed from the total supply.

***Garage block adj 14 Harveyfields, Waltham Abbey***

A1.38 This site is entered in the trajectory under planning application reference EPF/2040/13 for 9 dwellings. The planning permission expired in October 2016 and not all the pre-

commencement conditions were discharged prior to this date. As such, **-9 dwellings** have been removed from the supply.

***Roydon Marina, Village Road, Roydon***

- A1.39 This site is entered in the trajectory under planning application reference EPF/2444/13 for 14 dwellings. This planning permission expired in December 2016 and was for C1 Use. As such, **-14 dwellings** have been removed from the supply.
- A1.40 It is important to note that there may be more double counting than those sites outlined above. The Council should undertake a thorough assessment of their land supply to rule out any further instances of double counting.

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