

## **Addendum - Epping Forest District Local Plan – Response to Draft Plan – paragraph 2.44.**

### **Housing Need**

Please treat this submission as an addendum to my submission on the Regulation 19 draft Plan. The earlier submission is attached for ease of reference.

The calculation of housing need was carried out by the consultants, ORS.

A key figure in the calculation is the figure of 51,710. This is the total that ORS put forward as the total housing need for the four districts in the SHMA area.

This was based on calculations done for the Greater London Authority (GLA). These had been calculated for all English districts and ORS considered them the most appropriate figures to use, updating the previous calculations. ORS took the figure for the household increase across the four districts (47,248) and then converted this to dwellings, made an adjustment for household sizes, and this resulted in the figure of 51,710 for the SHMA area.

Using the GLA calculations the figure applicable to Epping Forest (EFDC) would be 13,370 (or 25.9% of the total).

But bizarrely and without any explanation ORS chose to divide the SHMA total (of 51,710) on a different basis. Instead the figure was split between the four districts on the basis of the relative numbers in a previous ORS calculation carried out in August 2016. This gave EFDC a total housing need of only 12,573 (or 24.3% of the total).

To calculate a total on one basis but then split on a different basis is, to say the very least, totally illogical and no explanation has ever been offered.

EFDC is currently proposing to build 13,152 properties over the Plan period and this should be compared to the housing need figure of 13,370. Although the two are reasonably close there is no margin, or contingency, to allow for possible slippage.

Details of the figures quoted are shown in attachment 2 to my previous submission.

### **An alternative approach**

The methodology applied by ORS seems to be very unusual and is not reflected in that used by the leading firms of consultants.

A common method that has been used by consultants such as Peter Brett and NLP has been to take the household projection figures produced by the ONS/MHCLG, convert to dwellings, and then add a percentage for market signals. This has been accepted by the Planning Inspectorate in numerous cases including, most recently, the nearby districts of Braintree and Colchester.

The latest household projections were issued by the ONS in 2018 but the government has recently recommended that these should not be used for housing need calculations. Instead the projections issued in 2016 by the MHCLG/DCLG should continue to apply.

For EFDC this would give a household increase over the Plan period of 14,374 which converts to dwellings of 14,942. To this must be added a percentage for market signals. I would suggest 10% as being appropriate (giving 16,436) although ORS has previously put forward a figure of 20% (giving 17,930).

It should be pointed out that the Planning Inspectorate have accepted market signals uplifts for Chelmsford of 20%, Colchester of 0% and Braintree of 15% (the Braintree figure was suggested as being 10%-15% with 15% as a maximum).

Both of these housing need figures (16,436 or 17,930) are, of course, considerably in excess of EFDC's proposals to build 13,152 properties.

### **Stansted Airport**

Please treat this submission as an addendum to my submission on the Regulation 19 draft Plan. The earlier submission is attached for ease of reference.

Since my previous submission there have been two significant developments concerning the employment figures.

The first was a report by the consultants, Hardisty Jones Associates (HJA), titled "West Essex and East Hertfordshire Assessment Employment Needs" which, although dated October 2017, did not get into the public domain until April 2018.

This concluded that there was a deficit of 20,000 jobs across the SHMA area in the Plan period. However, after considering a number of potential developments, including expansion at Stansted airport, this could be reduced to 2,100.

It then transpired that HJA had assumed an increase of 8,750 jobs at the airport (made up of 10,000, less job displacement in the area of 1,250).

Many considered the employment forecasts for the airport as being far too high and this was borne out by the second development when the airport submitted a recent planning application to increase passenger numbers.

The airport claimed that if permission was not granted employment numbers would increase by 3,000 (in the period up to 2028). If permission was granted then the airport forecast that a further 3,000 jobs would be created but this would depend upon passenger numbers reaching the new limit. In the event Uttlesford district council voted to give permission but this has not yet been enacted because of legal challenges.

It needs to be pointed out that the airport has a record of wildly optimistic forecasts for employment growth, that are never achieved in practice. So the numbers quoted should be treated as absolute maximums.

But even working on the basis of airport forecasts there is still a jobs deficit of 5,000-8,000 (see Note 1) and more likely one of 7,000-10,000.

There is no evidence that this has been taken into account when assessing housing need.

Note 1: The deficit of 8,000 is calculated by substituting 3,000 jobs for 8,750 and adding the difference (5,750) to the previous deficit of 2,100. The figure of 5,000 assumes that the expansion goes ahead and that a further 3,000 jobs are created. It should be pointed out that these figures are based on the airport's forecasts that are notoriously optimistic.

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