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EXAMINATION OF THE EPPING FOREST DISTRICT LOCAL PLAN, 2011-33.

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Dear Ms Blom-Cooper,

OFFICE FOR NATIONAL STATISTICS: 2018-BASED HOUSEHOLD PROJECTIONS

 The examination of the District Local Plan 2011-33 is subject to the transitional arrangements set out in paragraph 214 of the National Planning Policy Framework. Consequently, the policies in the 2012 Framework and the supporting guidance in previous versions of the Planning Practice Guidance (PPG) continue to apply. The relevant guidance concerning how to calculate the Objectively Assessed Need (OAN) for housing includes the following:

The government's official population and household projections are generally updated every 2 years to take account of the latest demographic trends. [...]

Wherever possible, local needs assessments should be informed by the latest available information. The National Planning Policy Framework is clear that Local Plans should be kept up-to-date. A meaningful change in the housing situation should be considered in this context, but this does not automatically mean that housing assessments are rendered outdated every time new projections are issued.

- 2. The Council's local needs assessment in the West Essex & East Hertfordshire SHMA July 2017 (Document EB407) takes the 2014-based household projections as the starting point for calculating the OAN for housing. This was found to be 12,573 dwellings for the plan period, or 572dpa, while the plan sets the housing requirement at 518dpa.
- 3. However, for the purpose of the guidance above, the 2018-based household projections published by the Office for National Statistics on 29 June now need to be considered as part of the *latest available information*. I have summarised the various projections for the plan period in the table below, which the Council should check. The 2018-based projections forecast a noticeably lower level of household growth than did the 2014-based ones, continuing a downward trend indicated by the 2016-based projections. Clearly though, these projections do not take account of all the factors with the potential to affect household growth rates investigated within the SHMA.

	Households in 2011	Households in 2033	Growth 2011-33	Growth per annum 2011-33
2014-based	52,083	66,457	14,374	653
2016-based	51,938	62,781	10,843	493
2018-based	51,938	58,554	6,616	301

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- 4. As part of my examination of whether the Plan's housing requirement is sound, I will need to consider whether the 2018-based household projections represent a meaningful change in the housing situation from the one which informed it. As a first step, I would like to invite the Council to address this question in an evidence-based written statement. In reaching your conclusion about whether a meaningful change in the housing situation has occurred, please cover the following issues alongside any others which might be relevant:
 - The effect of the 2018-based projections on the OAN for housing vs. the 2014-based projections used in the SHMA;
 - Whether there are implications for the housing requirement set in the plan, having regard to any wider considerations/interrelationships across the HMA; and
 - Whether the projected reduction in household growth affects the justification for the plan's proposed Green Belt releases.
- 5. I would be grateful to receive your statement by the end of **Friday 31 July 2020**. If you require more time, please advise the Programme Officer as soon as possible. I will then consider whether it is necessary to seek the views of other participants in the examination and, if so, the best means of doing so.

Yours sincerely,

Louise Phillips
INSPECTOR
14 July 2020.