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*Sent via email only to Louise St John Howe (louise@poservices.co.uk)*

Dear Ms Phillips,

**Epping Forest District Council: Examination of the District Local Plan 2011-33**

I write in connection with the recent consultation of examination documents ED114 and ED114A submitted by Epping Forest District Council (EFDC) dated 4<sup>th</sup> September 2020. These documents relate to the evidence based written statement which has been jointly prepared by ORS for the Strategic Housing Market Area (SHMA) partners: Harlow, East Herts and Uttlesford District Councils.

We have considered the relevant documentation submitted by EFDC and have the following comments to make.

Firstly, in continuation with our previous representations, this response has been prepared on behalf of our clients Croudace Strategic, who own Land at Stonards Hill, Epping (incorporated within EFDC site references EPP-B, SR-046ii, DSR 049 & 049.1). In association with Croudace Strategic, KLW have been promoting the site for residential development for some time through the Local Plan process.

We acknowledge the conclusions reached in the ORS report - that the full objectively assessed need household projections, using the 2018 based projections for the SHMA, do represent some change between the 2017 and 2015 findings put forward as part of the draft Local Plan. We also recognise that notwithstanding this slight variation, EFDC did not consider it material to alter the housing requirements put forward in its draft Local Plan. In fact, the projection based on the 2017 update was slightly higher at 51,700 dwellings than the 2018 based projections, at 48,950 dwellings for the SHMA, and EFDC are willing to



stand by the higher housing projections which we also support. We do however, query if this should be increased further still, given the household projections are based on 2018 data and projection methodology.

We have considered the detail of the updated “household formation” methodology for household projections introduced by the Office of National Statistics (ONS), which has added a new allowance of 4,669 households across the Housing Market Area for suppressed household formation (2020 SHMA report by ORS, ED114A). These suppressed households are one of the most striking measures of the impact of the failure to deliver enough housing on society as a whole. These are people and families who, if given the same access to housing opportunities as their parents’ generation, would be expected to form households within this plan period. Just over half of this allowance of 4,669 households comprises potential households which had already been suppressed at the start of the plan period in 2011, estimated at 2,408.

This estimate of suppressed household formation is substantially greater than the previous allowance of 641 concealed and homeless households that was made in the 2015 and 2017 SHMA updates under the previous methodology. By only counting households that were actually homeless or had formed but were concealed, it would appear that the previous methodology significantly underestimated the scale of suppressed household formation rates.

ED114A argues (paragraph 66 onwards) that this increased rate of suppressed household formation was implicitly allowed for in the previous SHMAs as part of the market signals allowance. However, the 2017 SHMA Update (EB407) does not appear to support the argument that the level of suppressed household formation was considered to be that high – paragraph 3.11 of EB407 indicates that the component of the increase attributable to suppressed household formation was 1,100 dwellings (allowed for within the market signals uplift) – a long way short of the 4,669 allowance now deemed appropriate. As such, we are concerned by the way in which the market signals allowance has been reduced from 20% in 2015 to 13.6% in 2017 and to 12% in ED114A, ostensibly in order to avoid double counting. The effect of this reducing market signals allowance has been to enable the Council to claim that it has allowed for the changing components of assessed need, yet not make changes of the appropriate scale to the resulting Objectively Assessed Need for housing or the draft plan’s housing target and consequently the number of sites allocated for development.

Therefore, whilst we note the Council’s view that there has not been a meaningful change in the housing situation, we believe that it is possible that the actual plan target should be higher. We are aware that the 2018-based projections only consider household formation rates based on the 2001 and 2011 censuses, rather than back to the 1971 census as previously. As such, it is reasonable to expect the first projections following the 2021 census to have greater clarity on household formation rates and will allow more accurate calibration of the suppressed household formation rate. We believe the data in ED114A suggests that need for housing after taking into account suppressed household formation rates, if coupled with a proper market signals uplift, would already indicate a higher need for housing than being allowed for in the draft plan.



As such, **we propose that an early Local Plan Review must be explicitly required**, should the Inspector agree to accept EFDC's latest evidence submission (ED114 & ED114A) and adopt the EFDC Local Plan. A review would be beneficial in order to assess the most up to date census data when it becomes available and inform the housing requirements for EFDC more accurately. Any review process would take account of any material policy changes or updates to the evidence base, such the outcome of the MHCLG Planning White Paper consultation in addition to updated Census data.

We hope you accept our arguments and look forward to your thoughts in due course.

If you should have any queries, please do not hesitate to contact me to discuss.

Yours sincerely,

**Louise Caney** MRTPI  
Associate Planner  
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