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Dear Louise

Re: Epping Forest Local Plan Examination - Submission on behalf of CEG and Hallam Land Management – Implications of 2018 Household Projections (documents ED111, ED114 and ED114A)

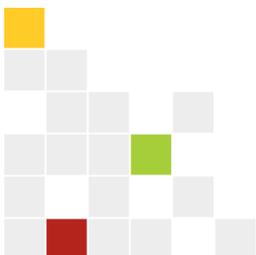
I write in response to your e-mail of 26 October 2020 that invited submissions in relation to the above issue and related documentation.

The Inspector's original letter on this issue (ED111 dated 14 July 2020) summarised the household growth in Epping Forest indicated by the 2014, 2016 and 2018 based household projections over the 22 year period 2011–33. The Inspector, in presenting this data, referred to a "noticeably lower level of household growth" in the new projections.

The report by ORS "Updating Overall Housing Need using the 2018-based projections" (ED114A September 2020) covered the four authorities within the SHMA area. This report, at Figure 3, records the fact that the 2018 projections detail three sets of household growth figures using 2-year, 5-year and 10-year migration trends. The 10-year migration trend household growth figure for Epping Forest for the 2011-33 period is 8,792 which is 2,176 higher than the figure of 6,616 that results from the 2-year trend quoted in the Inspector's letter.

ORS have consistently relied on the 10-year migration trend data in their reports for this SHMA area. ED114A notes that the 10-year trend is less susceptible to short-term fluctuation and concludes that "it is right to focus on long-term migration trends". On this basis the 2018 projections, although lower than previous projections, are not as low as set out in the Inspector's letter.

After taking account of past under-delivery of housing (and its impact in suppressing household formation), adjustment in response to market signals and the application of a vacancy rate, the OAN for housing in Epping Forest based on the 2018 projections (as set out in Figure 21 of ED114A) is 11,920.



This is only marginally lower than the OAN of 12,573 dwellings originally assessed for the purposes of the Local Plan. The ORS report is right to conclude that this is not “a meaningful change in the housing situation from the one that informed the Plan”.

However, it is important to note that the OAN for Epping Forest of 11,920 set out in ED114A is higher than the 11,400 housing requirement set by the Plan. This updated assessment of the Epping Forest OAN therefore underpins our view (and the position of other parties), expressed through the Local Plan examination, that the Plan housing requirement should be increased to match the level of need.

There are clear opportunities to increase housing provision within the Plan and we note in particular the evidence we have put forward to demonstrate that the housing capacity of the Latton Priory site is significantly higher than the allocated figure. We consider that action to increase the Plan’s housing requirement is necessary to ensure the Plan is sound in terms of it being “positively prepared” and “effective”.

Although this Plan is being examined under transitional provisions under the 2012 NPPF and the standard method to determine local housing need does not apply, it is notable that the current standard method results in a need for 953 dwellings per annum, significantly more than the 518 dpa proposed in the Plan. This disparity against the current, now established, method of assessing housing need emphasises the need to increase the Plan housing requirement to at least the level indicated by the ORS report.

Yours sincerely

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