

GR/CAM.0115

17 November 2020

Louise St John Howe  
Programme Officer  
PO Services,  
PO Box 10965,  
Sudbury,  
Suffolk  
CO10 3BF

Dear Ms St John Howe

**Epping Forest Local Plan Examination - Implications of the 2018-based household projections**  
**Respondent ID: 5799**

Thank you for the opportunity to comment on whether the 2018-based household projections have implications for the submitted plan in respect of the Objectively-Assessed Need (OAN) for housing. We submit comments on behalf of our clients: Martin Grant Homes, Persimmon Homes and Taylor Wimpey who have an interest in land forming part of the Water Lane Area allocation which is part of the Garden Town Communities (Respondent ID: 5799).

In considering whether there has been a meaningful change in the housing situation, we have reviewed the Council's joint response to the Inspector and their accompanying report dated 4 September 2020 (ED114 and ED114A). This report concludes that even though the 2018-based projections forecast a lower level of household growth than did the 2014-based ones, continuing a downward trend indicated by the 2016-based projections, this decrease in requirement is not considered to be a meaningful change in the housing situation. After taking account of market signals and making allowance for vacant and second homes, the Full Objectively Assessed Need using the 2018-based projections is 48,950 dwellings over the period 2011-2033, an average of 2,225 dpa. This housing need is higher than the OAN identified by the 2015 SHMA (46,100 dwellings) but lower than that identified by the 2017 Update (51,700 dwellings); however, the latest information does not represent a meaningful change in the housing situation.

It is our view that the LPA is correct in their re-evaluation of the housing situation further to the publication of the 2018-based household projections. The slight revision in the OAN from the 2014-based and 2017-based projections (approximately 5% change) does not

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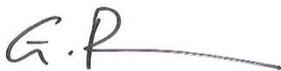
represent a meaningful change in the housing situation and the Local Plan housing requirement and Green Belt releases contained within the Local Plan Submission Draft do not need to be revised. These figures are clearly stated as minimum figures in the Local Plan which provide the necessary flexibility in the Plan to adapt to circumstances as they evolve during the Plan period.

There have already been significant delays in the preparation of this Local Plan. This plan is being examined under the transitional arrangements as set out in paragraph 214 of the 2019 NPPF having been submitted prior to January 2019. This transitional period was included in the NPPF to allow LPAs that had submitted plans, or were close to submission, to continue with their existing evidence base. The transitional period reflects the Government's desire for a plan led system and the drive to ensure all LPAs had local plans. The continued reliance on the submitted evidence for transitional plans is supported in the November 2018 letter to Chief Planning Officers which states in its update on the use of the 2016-based household projections in the standard method that plans submitted on or before the 24 January 2019 can be based on existing assessments of housing need at the time of submission. This would suggest that the Government was not endorsing the use of the later household projections within transitional plans in the same way that they did not endorse their use in the current standard method.

However, the Council has, as required by PPG, considered the latest data, and concluded no change is required, a position which is supported by my clients. It is in the best interests of all those involved to ensure that this Local Plan is progressed to adoption in a timely manner to provide certainty in the District in relation to the delivery of housing and economic development.

I trust these comments are useful in the consideration of this matter. I look forward to receiving details of the consultation on the main modifications of the Plan in due course.

Yours sincerely

A handwritten signature in black ink, appearing to read 'G. Rowan', with a long horizontal flourish extending to the right.

Gabrielle Rowan

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