

Examination of the Epping Forest Local Plan 2011-2033 - reconsidering Housing Targets

Following the publication of the 2018-based household projections the District Council was invited by the Inspector to say whether these had any implications for the OAN (Overall Assessed Need) for housing, the housing requirement or Green Belt release in the draft Local Plan.

Planning Policy Guidance states: 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should be considered in this context, but this does not automatically mean that housing assessments are rendered outdated every time new projections are issued.

Forecasting numbers of households needing new housing is complex, with many variables. It has involved several changes in method. It is unavoidably inexact, and unable to take account of relatively sudden changes in economy or society.

Although Planning Policy Guidance tells us that 'changes in the housing situation' do not automatically mean that previous assessments are outdated, there has been a consistent, steep downward trend in projections from 2014 to 2018, the latest figures available. This seems due mainly to changing trends in migration into and out of the SHMA - the Shared Housing Management Area of East Herts DC, Uttlesford DC, Harlow DC and Epping Forest DC.

Figures given in the ORS report (Opinion Research Services) show falls in estimates of households for the whole SHMA for the 2011-33 period, between those made in 2014 and in 2018, of from 50,697 down to 32,529, or from 50,697 down to 37,320 (depending on method) - that is, falls of around 18,000 or 13,000.

For Epping Forest District the relevant figures are from 14,374 down to 8,792 or to 6,616 - significant falls of around 5,000 or 7,000.

Nevertheless the report goes on to say "this analysis has demonstrated that changes to births, deaths and economic activity rates mean that the 2018-based projection 10-year migration scenario" - that is, 37,320 households for the SHMA - "would provide sufficient workers for the identified jobs growth."

But then two figures are added to this total for the SHMA:

- i) an estimate of 'suppressed household formation' - 4,669, bringing the total to 41,989;
- ii) a further estimate of 6,961, to take account, among other things, of 'market signals', previous under-supply and vacant and second homes:

These give a total figure of 48,950 dwellings - termed the Full Objectively Assessed Need, for the SHMA.

The equivalent figures for these two additions in Epping Forest district are 1,438 - suppressed household formation' and 1,271 for 'market signals', historic under-supply, vacant and second homes: together these add 2,709.

(I calculate an overall total for Epping Forest district as 11,501 - the ONS report includes a further adjustment and gives 11,920.)

These additional estimates of course 'cancel out' the significant fall in projected new households shown in the 2018 figures. Assumptions made and methods used in producing these estimates are complex and not wholly convincing, at least to this lay reader! For example, it can be argued that custom, income and personal needs shape what is or is not seen as a 'suppressed' household, and this can change quite quickly over time for reasons unrelated to housing supply. Do suppressed households estimated at the start of the plan period, 2011, and included in the calculation, have relevance now and to 2033? And should 'market signals' be calculated as independent from previous under-supply? In the absence of clear argument and an expert 'second opinion' these figures are of doubtful forecasting value and I would set them largely aside.

As quoted above (ORS report) the 2018-based projection (with 10-year migration trends) of 37,320 households for the SHMA is estimated to ensure sufficient workers for the identified jobs growth. This is a good enough basis for planning future housing growth in the SHMA. Beyond these numbers some inward migration deterred, and some outward migration taking place, need not be a disaster for the economy of the SHMA or for households involved.

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Affordable & Social Housing

One indication of household need which is not inexact and does not depend on estimates is the number of households on the Council's waiting list for social housing. In the Epping Forest district there are about 1,500 (latest available figures). The Council also could estimate demand for other types of affordable housing, and make a stronger case in planning and housing policy. Policies which addressed these needs effectively, rather than depending on difficult to enforce S.106 agreements with reluctant developers, would help to meet housing growth targets and solve local families' pressing needs at the same time.

Keeping Plans up-to-date

"Wherever possible, local needs assessments should be informed by the latest available information" (PPG above). The National Planning Policy Framework is clear that Local Plans should be kept up-to-date. Two significant events which post-date submission of the EFDC Local Plan are the Covid19 pandemic, and Brexit. The pandemic has already had an impact on the economy and will continue to affect activity during a recovery period of uncertain length. Brexit in the short term and possibly for longer may also slow the economy. Job creation, migration into and out of the area and new household formation may be affected.

In addition, if the government makes good its promise to 'level up' economic opportunity in the Midlands and the North of England, that too could mean relocation of some employment out of this area.

Further ONS household forecasts may not be available until 2022 but approval of the Local Plan 2011-33 is already overdue, so that the Council's planners should respond to these significant but unforeseen changes before then.

The EFDC Local Plan 2011-33 already involves considerable and unwelcome pressure on open spaces, on the Green Belt, on the eco-health of Epping Forest and, because of increased housing densities, on the quality of life in the towns, on parking and traffic volumes. The District Council should take this opportunity to examine critically the basis for the District's Local Plan target of 11,400 homes and the difficulties this has presented. It should also take into account medium- to long-term changes in the economy of the area likely to arise from the Covid19 pandemic, from Brexit and from regional 'balancing up' policies, and ask whether holding back some sites from the market, for review and reconsideration at a later date, would be a more prudent approach. A revised target closer to the 8,792 households of the 2018 forecast (see above) would be a useful guideline.

As a consequence, I conclude that the latest figures from the ONS (2018), taken into consideration with significant economic and policy changes arising since the Local Plan 2011-33 was submitted, do represent a meaningful change in the housing situation.

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