

**EPPING FOREST DISTRICT COUNCIL**  
**EXAMINATION OF THE DISTRICT LOCAL PLAN, 2011-2033**

**MATTER 3: THE QUANTITATIVE  
REQUIREMENTS FOR DEVELOPMENT**

**PRE-HEARING STATEMENT ON BEHALF OF  
EPPING FOREST DISTRICT COUNCIL**

**JANUARY 2019**

## **INTRODUCTION**

Epping Forest District Council ("the Council") submits this statement in response to the Inspector's Matters, Issues and Questions ("MIQs") (ED5). This statement addresses Matter 3: The Quantitative Requirements for Development and provides the Council's response to all of the Inspector's questions associated with Issues 1 to 4 (ED5, pp 6-8).

This statement has been prepared with the assistance of Opinion Research Services (Issue 1 and Issue 2) and Hardisty Jones Associates (Issue 3).

Where appropriate, the Council's responses in this statement refer to but do not repeat detailed responses within the hearing statements submitted by the Council concerning other Matters.

Key documents informing the preparation of this statement to which the Council may refer at the hearing sessions include:

- [EB405 West Essex and East Hertfordshire Strategic Housing Market Assessment \(2015\)](#);
- [EB407 Strategic Housing Market Assessment Establishing the Fully Objectively Assessed Need \(2017\)](#);
- [EB1202 Memorandum of Understanding on Distribution of Objectively Assessed Housing Need across the West Essex/East Hertfordshire Housing Market Area \(2017\)](#);
- [EB204 Sustainability Appraisal for the Epping Forest District Plan \(2017\)](#);
- [EB402 Epping Forest District Council Gypsy, Traveller and Travelling Showpeople Accommodation Assessment Need Summary Report \(2017\)](#);
- [EB409 Economic Evidence to Support the Development of the OAHN for West Essex and East Herts \(2015\)](#);
- [EB600 Economic and Employment Evidence to Support the Local Plan and Economic Development Strategy \(2015\)](#);
- [EB603 Employment Review \(2017\)](#);
- [EB610 West Essex and East Hertfordshire Assessment of Employment Needs \(2017\)](#); and
- [EB1008 Town Centres Review \(2016\)](#).

All documents referred to in this statement are listed in Appendix A of this statement together with links to the relevant document included within the Examination Library

Examination Library document references are used throughout for consistency and convenience.

**Issue 1: Is the housing requirement for the plan period 2011-2033 appropriately defined having regard to the composition of the Housing Market Area (HMA); and the Objectively Assessed Need (OAN) for housing within the HMA?**

**Inspector's Question 1**

**HMA**

- 1. Is the HMA comprising Epping Forest, East Herts, Harlow and Uttlesford Councils justified? Should the HMA include Broxbourne Borough? How has the influence of neighbouring London Boroughs been taken into account?**

***Response to Question 1***

1. The Housing Market Area (HMA) comprising Epping Forest, East Herts, Harlow and Uttlesford District Councils is fully justified.
2. Chapter 2 of the Strategic Housing Market Assessment (SHMA) 2015 (EB405), demonstrates that the selection of the HMA was informed by comprehensive and robust analysis that took proper account of government policy and practice guidance and the best available evidence. The analysis concluded that the most appropriate functional housing market area should be based on Harlow, with most of East Hertfordshire, Epping Forest and Uttlesford District administrative areas (EB405, p41, paragraph 2.73).
3. The SHMA analysis specifically addressed whether or not Broxbourne Borough ("Broxbourne") should be included within the HMA (paragraph 2.69) and found that commuting patterns suggested that Broxbourne could be considered part of the functional HMA. However, other factors including rental values, public transport infrastructure, and social and cultural networks suggested that it should be considered separately. On that basis, the SHMA analysis concluded that Broxbourne forms part of a separate Broad Rental Market Area and, accordingly, the SHMA concluded that Broxbourne should not be included as part of the functional HMA.
4. The detailed commuting analysis informing the SHMA recognised the importance of London and that the wider London HMA likely overlaps with other local housing market areas (paragraph 2.24). Indeed, the SHMA acknowledged that there are some parts of Epping Forest District and Uttlesford District where the majority of resident workers commute to work in Greater London (Figure 14).

5. As the functional relationships with London are evidently important, it would be possible to define a housing market area for London that extended beyond London's administrative boundaries. However, London is based on a two-tier planning system with the Mayor's London Plan covering the Greater London administrative area – so it is appropriate for the London HMA to also align with the administrative boundary of Greater London. This is a long-standing position which has been endorsed by the High Court.<sup>1</sup>
6. Whilst it would be inappropriate to include any neighbouring London Boroughs as part of the identified HMA, the SHMA takes full account of the influence of these areas when establishing the Objectively Assessed Need (OAN). This includes the functional relationships in terms of both migration and commuting.
7. Household projections provide the starting point for the OAN and these are based on population projections which take account of historic migration trends. Therefore, the well-established migration flows from London boroughs to the HMA are properly factored into the household projections and are counted within the OAN. Furthermore, the SHMA 2017 (EB407) ensures full alignment between the OAN and the Greater London Authority household and population projections, which inform the London Plan (EB407, at paragraphs 2.27-2.30, 3.14-3.17 and 3.25-3.29).
8. In aligning jobs and workers, the SHMA considers commuting flows from the HMA (including the large flows to some London boroughs) and recognises that many resident workers will not be available for local jobs. The SHMA 2015 considers the potential for a shortfall in the number of workers available locally (at EB405, paragraph 5.38), and the SHMA 2017 confirmed that there was alignment between jobs and workers having regard to commuting patterns and all other relevant factors (EB407, paragraph 2.26). Therefore, the well-established commuting flows to London boroughs from the HMA have also been properly considered when establishing the OAN.

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<sup>1</sup> *London Boroughs v Mayor of London & SSCLG* [2014] EWHC 751 (Admin)

**Inspector's Question 2**

**OAN for Housing and the Housing Requirement**

For the period 2011-2033, the Strategic Housing Market Assessment July 2017 (EB407) found the OAN for the HMA as a whole to be 51,700 additional homes. The OAN for Epping Forest was found to be 12,573 new homes, amounting to 572 per annum.

2. Does the SHMA July 2017 identify the full OAN for housing for the HMA and for Epping Forest specifically?

***Response to Question 2***

9. The SHMA 2017 (EB407) identifies the full Objectively Assessed Need (OAN) for market and affordable housing in the HMA and for Epping Forest District specifically, consistent with paragraph 47 of the NPPF.
10. The identified OAN meets household and population projections (taking full account of migration and demographic change), and caters for housing demand, consistent with paragraph 159 of the NPPF.

- a. Was the standard methodology recommended by the Planning Practice Guidance (PPG) followed? Are any departures, particularly in relation to how migration and market signals were taken into account, clearly explained and justified?

11. The approach used to establish the OAN followed the standard methodology recommended by the PPG on the 'Housing and economic development needs assessments' (Ref ID: 2a), first published on 15 March 2015. The version in force when the LPSV was approved by Full Council on 14 December 2017 is available on the National Archives website — archived on 7 June 2018.<sup>2</sup>
12. Whilst the Government has now published a new standard methodology (and has recently consulted on further proposed changes to update the Planning Practice Guidance on Housing Need Assessment)<sup>3</sup>, under the transitional arrangements

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<sup>2</sup> [PPG Ref ID: 2a \(Housing and Economic Needs Assessments\) — archived on 7 June 2018](#)

<sup>3</sup> [Technical consultation on updates to national planning policy and guidance, MHCLG, October 2018](#)

set out in Annex 1 to the revised NPPF (July 2018), the soundness of the LPSV should be judged against policies within the NPPF and the PPG published when preparing the Plan.

13. The approach to migration is discussed in detail in the original SHMA 2015, where the preferred use of a 10-year trend and the reliance on Census data is clearly explained and justified (EB405, pp 41-43, paragraphs 3.32-3.39). The interim demographic update 'Updating the Overall Housing Need' (EB406) considered the impact of more recent migration trends (paragraphs 15-24) and the SHMA 2017 took account of all of this evidence (EB407, paragraphs 2.9-2.17).
14. The SHMA household projections were scrutinised by the Inspector appointed to carry out the examination of the East Herts District Plan. In her Final Report July 2018 (EB1506), the Inspector concluded: "*Migration assumptions*. The updated figures are robust" (paragraph 31).
15. The approach to market signals is discussed in detail in the SHMA 2017 (EB407), where Chapter 3 clearly explains and fully justifies the most appropriate response to market signals based on a detailed analysis of the evidence. With regard to the proposed uplift, the report concludes (paragraph 4.3):

"The FOAN includes an uplift of 6,200 dwellings in addition to the household projection-based estimate of housing need of 45,500 dwellings. This represents an uplift of 14% on the housing need number suggested by household projections; however, more importantly, the FOAN represents a 69% increase in the rate of housing supply delivered over the previous decade 2001-2011."

16. The SHMA response to market signals and the associated uplift proposed were also considered at the East Herts District Plan examination. The Inspector's Final Report concluded (EB1506, paragraph 32):

"*Market signals*. The updated SHMA considers market signals affecting the HMA ... a 14% market signal uplift is appropriate as a response to address market pressures. This equates to over 6,200 dwellings across the HMA."

**b. Has consideration been given to the high level of housing need in the neighbouring London Boroughs emerging through the London Plan? If not, are the figures justified?**

17. The SHMA 2017 (EB407, paragraph 7) assumptions are fully consistent with the GLA household and population projections used to inform the London Plan
18. The OAN for housing establishes the housing need for the local authorities which form the HMA and it does not include housing need identified for neighbouring

London Boroughs. Where appropriate, any unmet need from neighbouring boroughs would need to be considered under the Duty to Co-operate. None of the neighbouring boroughs have approached the Council, or any of the other local authorities in the HMA to help address any unmet housing need.

19. The Independent Examination for the draft New London Plan<sup>4</sup> commenced on Tuesday, 15 January 2019. The hearings concerning 'Housing requirement (Matter 17) and 'Housing strategy' (Matter 18) will take place on 5 and 6 February 2019 respectively. Within the Draft New London Plan the Mayor has identified a need for 66,000 dwellings each year for at least 20 years (paragraph 1.4.3) and ten-year housing supply targets totalling 64,935 dwellings each year across the 33 London Boroughs for the period 2019/20 to 2028/29 (Figure 4.1). If the Panel finds the New London Plan sound in this respect, there would be a shortfall of 1,065 dpa, equivalent to 1.6% of the identified need; however, Policy H1 part D of the Draft New London Plan identifies that boroughs “*should work with the Mayor to resolve any anticipated shortfalls*”. On this basis, it would appear that the Mayor is seeking to meet the housing needs of Greater London in full until at least 2029.

### **Inspector's Question 3**

- 3. What is the relevance of the OAN figure of 13,278 for Epping Forest DC referred to in paragraph 6.8 of the Sustainability Appraisal (EB204)?**

### ***Response to Question 3***

20. The SHMA 2015 (EB405) originally identified a need for 46,100 dwellings (including 11,300 dwellings in Epping Forest) over the 22-year period 2011-2033. An interim demographic update (EB406) prepared in August 2016 identified that the need could be as high as 54,600 dwellings (including 13,278 dwellings in Epping Forest) over the same period. On this basis, the local authorities comprising the HMA considered housing need based on this broad range when developing scenarios to test through the Sustainability Appraisal (SA) (EB204), and it is the figure from the interim demographic update that is referred to in paragraph 6.8 of the SA.
21. The SHMA 2017 (EB407) provides the most recent OAN for housing. This identifies a need for 57,700 dwellings (including 12,573 dwellings in Epping Forest) over the 22-year period 2011-2033. This figure closely aligns with the housing requirement of around 57,100 dwellings (including 11,400 dwellings in

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<sup>4</sup> [https://www.london.gov.uk/sites/default/files/draft\\_london\\_plan\\_-\\_showing\\_minor\\_suggested\\_changes\\_july\\_2018.pdf](https://www.london.gov.uk/sites/default/files/draft_london_plan_-_showing_minor_suggested_changes_july_2018.pdf)

Epping Forest) that had previously been agreed through the Memorandum of Understanding (MoU) between East Herts District Council, Epping Forest District Council, Harlow District Council and Uttlesford District Council relating to the Distribution of Objectively Assessed Housing Need across the Housing Market Area (EB1202) in March 2017.

**Inspector's Question 4**

- 4. Is it justified for the HMA as a whole, and for Epping Forest DC specifically, to plan for less than the OAN as established by the SHMA 2017, at 51,100 and 11,400 homes respectively?**

***Response to Question 4***

4. The HMA as a whole, and the LPSV plan for marginally less housing than the OAN established by the SHMA 2017 (EB407). For the reasons explained below, the Council contends that this approach is justified.
5. The HMA partner authorities, supported by Essex County Council and Highways England signed a Memorandum of Understanding (EB1202) in March 2017 in order to agree the Distribution of Objectively Assessed Housing Need across the HMA. Paragraph 3.4 Figure 5 (EB1202) sets out the most suitable spatial option to deliver the agreed housing requirement of 51,100 dwellings across the HMA within the plan period. This includes approximately 11,400 dwellings to be delivered within Epping Forest District, taking account of the infrastructure constraints and specifically the capacity on the highway network, impact on the Green Belt and Epping Forest SAC.
6. Based on all of the evidence, a housing requirement figure of 51,100 dwellings was established for the HMA over the 22-year period 2011-2033. This took account of the likely scale of housing needed and the development constraints considered through the Sustainability Appraisal process (EB203), which tested alternative scenarios with delivery of up to approximately 57,400 new homes. The SHMA 2015 (EB405) originally identified a need for 46,100 dwellings over the 22-year period 2011-2033. The interim demographic update (EB406) prepared in August 2016 identified that housing need could be as high as 54,600 dwellings over the same period.
7. The MoU between the HMA partner authorities (EB1202) was agreed in March 2017 on this basis. This predated the SHMA 2017 (EB407) which was published in July 2017 as part of the evidence base for the East Herts District Plan Examination, which identified an OAN of 51,700 dwellings. The marginal increase in OAN identified within the SHMA 2017 (over and above the OAN requirement identified in the MoU (EB1202)) reflected the most up to date information available at that time, notably the 2014-based CLG household projections which had been published in July 2016.

8. PPG recognises that "There is no one methodological approach or use of a particular dataset(s) that will provide a definitive assessment of development need" (ID Ref: 2a-005); and that "Establishing future need for housing is not an exact science. No single approach will provide a definitive answer" (ID Ref: 2a-014).
9. As the latest OAN was only 1.2% higher than the housing requirement agreed through the MoU (and the difference represents only 600 dwellings over the 22-year plan period, equivalent to a total of 27dpa across the four local authorities that comprise the HMA), the latest OAN does not represent a meaningful change in the housing need identified for the HMA.
10. With regard to the specific figures for Epping Forest, the SHMA 2017 identified an OAN of 12,573 dwellings, but this only represents a starting point for the housing requirement as it does not take into account environmental, policy and infrastructure constraints. As set out above, these have been factored into the overall distribution of growth agreed through the MoU (EB1202). Furthermore, although the minimum housing requirement has been agreed to be around 11,400 dwellings, it should be noted that the LPSV provides for delivery of up to 13,152 dwellings overall, which is actually higher than the identified OAN (12,573 dwellings).

**a. Has the alternative of delivering the OAN been tested through Sustainability Appraisal? If not, is the SA process deficient?**

11. Yes, the alternative of delivering the Objectively Assessed Need (OAN) has been tested through the Sustainability Appraisal (SA) (EB204). A number of spatial options were tested through the SA process as set out at paragraph 6.14.
12. Whilst the SA was undertaken before the SHMA 2017 (EB407) established the OAN of 51,700 dwellings for the Housing Market Area (HMA), this is within the range of 46,100 dwellings to 54,600 dwellings that had previously been considered, and lower than the 57,400 dwellings tested through the SA process.

**b. Will the Plan in fact provide more housing than the OAN of 12,573 as found by the SHMA 2017 (13,152 indicated in Appendix 5)? If so, is it justified to set the requirement below this?**

13. Yes, the Plan will provide for 13,152 dwellings, and it is justified to set the housing requirement at a minimum of 11,400 dwellings.
14. As previously noted above the OAN only provides a starting point for the housing requirement. It does not take into account constraints that should rightly be

considered. These constraints were considered through the evidence base which informed the agreement of the preferred spatial option for the distribution of growth by the Cooperation for Sustainable Development Board (EB204, paras 6.16 - 6.18).

15. The difference between the housing requirement and the housing supply identified by the Plan represents a contingency equivalent to approximately 15% of the housing target. This provides for flexibility and will help to maintain a five-year housing land supply throughout the Plan period, ensuring that the housing target of at least 11,400 dwellings will be achieved.

**Issue 2: Does the Plan include an appropriate target for accommodation for Gypsies & Travellers and Travelling Showpeople District?**

**Inspector's Question 1**

1. Paragraph 2.46 indicates a need for 64 Gypsy & Traveller pitches and one Travelling Showpeople yard over the Plan period 2011-2033. Is this the full objectively assessed need as supported by evidence and does the Plan meet it? Should the requirement for the whole plan period (i.e. 64 pitches and 1 yard) be set out in Policy SP2(D) in the same way that it is for general housing in SP2(A)?

**Response to Question 1**

16. Yes, the full objectively assessed need supported by evidence (EB402 and EB402A) is for 64 Gypsy and Traveller pitches and one Travelling Showpeople yard over the plan period.
17. The Plan provides an adequate supply to meet the identified full objectively assessed need. The residual need for the Plan period is 32 Gypsy and Traveller pitches (64 pitches less 32 completed and committed making 32 pitches) and one yard for Travelling Showpeople. The LPSV provides for 38 pitches plus the single yard for Travelling Showpeople.
18. The Council considers that the requirement for the whole plan period should be set out in Policy SP 2(D) in the same way that it is for general housing in SP 2(A) and therefore proposes a modification to Policy SP 2(D) as follows:  
  
~~Delete: D. An additional 38 Pitches and 1 yard will be provided through the allocation of sites in the Local Plan to accommodate~~  
  
Replace with "D. Within the period 2011-2033 the Local Plan will provide for a minimum of 64 pitches and one yard to accommodate the needs of travellers as identified in Policy SP 5 and Chapter 5....."

**Inspector's Question 2**

- 2. Paragraph 2.46 explains that the figures above do not include an allowance for those who need to live in a caravan but who do not meet the definition of Gypsies & Travellers in the Planning Policy for Traveller Sites (PPTS). How will the needs of other persons defined by Section 124 of the Housing and Planning Act be met?**

***Response to Question 2***

19. The Council will meet the needs of the 'other persons' identified by Section 124 of the Housing and Planning Act through the consideration of applications for planning permission for caravans or moorings for houseboats from those who are not "travellers" as defined within PPTS, Annex 1: Glossary. These will be assessed against all policies in the Local Plan, but in particular Policy H 1 Housing Mix and Accommodation Types. Paragraph C of Policy H 1 refers to "sites upon which caravans can be stationed, or locations for mooring houseboats".

**Issue 3: Is the Functional Economic Market Area (FEMA) upon which the Plan is based appropriately defined; and are the requirements for job growth and employment land set out in the Plan justified?**

**Inspector's Question 1**

- 1. Has the FEMA, comprising Epping Forest, East Herts, Harlow and Uttlesford Councils been defined by reference to the advice in the PPG? Is it justified?**

**Response to Question 1**

20. Yes, the FEMA has been defined in accordance with PPG. Specifically, PPG ID 2a-007-20150320<sup>5</sup> which stipulates that “Local planning authorities should assess their development needs working with the other local authorities in the relevant housing market area or functional economic market area in line with the duty to cooperate. This is because such needs are rarely constrained precisely by local authority administrative boundaries”. Paragraph 2a-012-20140306<sup>6</sup> notes that there is “no standard approach to defining a functional economic market area”; however, there are a range of factors that can be taken into account and were considered.
21. The 2015 economic study to support the development of the OAHN for West Essex and East Herts (EB409) undertook work to define the FEMA, chapter 2 (pp. 3-6) and Appendix 1 (pp. 22-28) sets out the justification for defining the FEMA. This work included consultation with EFDC and neighbouring authorities and analysing Census data on commuting patterns. The conclusion of this analysis was that the FEMA aligned with the Housing Market Area (HMA), whilst accepting external influences were present from the surrounding hinterland and particularly from London.
22. Further analysis of the Epping Forest District FEMA was considered as part of the 2015 district wide economic and employment study (EB600). Chapter 2 (pp. 4-7) sets out the conclusions of this with more detailed discussion at Appendix 2 (EB600B, pp. 6-12).
23. The evidence points to complex functional economic relationships given the presence of significant arterial transport infrastructure e.g. M25, M11, Central line; and the close proximity of London (and to a lesser extent Cambridge). The FEMA is therefore shown

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5 <https://webarchive.nationalarchives.gov.uk/20180310103648/https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

6 <https://webarchive.nationalarchives.gov.uk/20180310103648/https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

to have fuzzy and porous boundaries and linkages beyond its core perimeter. Whilst the evidence suggested the potential inclusion of Broxbourne within the core FEMA, the analysis of impact in terms of employment forecasts and associated land requirements indicated minimal change in conclusions. The alignment of the FEMA with the SHMA area was therefore justified to provide a consistent policy basis, reflecting the core zone where a majority both live and work, and fits to district administrative boundaries for pragmatic planning and data analysis purposes.

24. The FEMA and associated work were considered during the recent examination of the East Herts District Plan. The Inspector concluded (EB1506, p12, paragraph 46) that the strategy for employment set out in the District Plan had been positively prepared and soundly based, stating in her final report:

“The FEMA authorities have worked together through the duty to cooperate to identify need and apportion the required land across the market area. A range of forecasts, assessments and land reviews support the employment need and distribution”.

### **Inspector's Question 2**

- 2. Have the conclusions of the Employment Needs Assessment (EB610) in respect of job change/growth and employment floorspace requirements for the FEMA as a whole and for Epping Forest specifically been arrived at by following the methodology recommended in the PPG? Are any departures clearly explained and justified? In particular, has the Assessment utilised an appropriate forecasting model? Was it justified to moderate the baseline utilised by the East of England Forecasting Model 2016? Has this resulted in the Plan proposing a level of job growth below that needed to balance the labour market? (Reps 19LAD0058)**

### ***Response to Question 2***

25. Yes, in combination, the West Essex and East Hertfordshire Assessment of Employment Needs 2017 (EB610) and the District level Employment Review (EB603) 2017 address matters of job change/growth and employment floorspace requirements for the FEMA and Epping Forest District respectively. These were prepared in accordance with PPG paragraphs 2a-030 to 2a-034 in particular<sup>7</sup>. Paragraphs 2a-032 to 2a-034 focus on future trends and requirements. The District Employment Review (EB603) provides additional local intelligence including stakeholder consultation and commercial market analysis (past, current and future trends). This allows the

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<sup>7</sup> <https://webarchive.nationalarchives.gov.uk/20180310103648/https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments>

formulation of more detailed locally specific evidence to inform policy making, building on the FEMA wide analysis.

26. The West Essex and East Hertfordshire Assessment of Employment Needs (EB610) sets the FEMA wide context. This utilises sectoral employment forecasts (labour demand) [Chapter 2, pp 5-15] which are adjusted to take account of locally specific evidence and sector drivers which were not captured in the overarching East of England Forecasting Model (EEFM) [Chapter 3, pp 16-24]. The employment scenarios were tested against demographic projections (labour supply) drawing on the SHMA [pp 17, 24 and 32]. This ensured that sufficient employment floorspace requirements were identified to meet the full needs of the projected population growth. Historic monitoring data was used to map past take-up [pp 32-33] and validate the emerging findings.
27. The EEFM was a justified basis for the assessment, providing consistent forecasts for each of the constituent districts. The EEFM is prepared by reputable economic forecast providers. The preparation of a moderated baseline was justified on the basis of the available evidence (specifically pp 9-11). This demonstrated clear anomalies with the spatial distribution of the forecast employment growth relative to long-term trend patterns.
28. The moderated baseline was further adjusted on the basis of clearly evidenced employment growth drivers such as the relocation of Public Health England to Harlow, creating an additional 3,250 jobs in the area above the moderated baseline and the planned growth of Stansted Airport, creating an additional 6,750 jobs in the area above the moderated baseline. This was justified on the basis of the evidence and the labour supply projections which indicated a need to deliver higher levels of employment growth. Adjustments were only made where there was a clear commitment and associated policy and plans in place.
29. The economic forecasts are translated into estimates of employment floorspace and land in accordance with the guidance at PPG, paragraph 2a-034. Broader market factors are also taken into account through the provision for replacement demand. Figure 4.2 of EB603 (p19) illustrates that the net position can significantly mask gross levels of activity in terms of both gains and losses of employment floorspace. It is vital that sufficient capacity is provided to enable the required gross levels of development to meet the requirements of the economy. The need for regeneration and redevelopment of existing stocks was also confirmed by stakeholders as cited at section 4.3 of EB603 (pp 21-22).
30. The LPSV is prepared on the basis of ensuring sufficient employment land and jobs to meet the full needs of the future labour market. The West Essex and East Hertfordshire Assessment of Employment Needs (EB610) Figure 3.7 identifies that following adjustment for the alternative scenarios there remains an additional job requirement of 2,100 across the FEMA (as quoted in Reps 19LAD0058). This is addressed at section 4.5 (p 32) with an additional allowance to accommodate a higher level of employment to bring both labour demand and supply into balance. The employment land provision within the LPSV alone meets, and exceeds, the additional requirement identified to

ensure labour market balance through the allocation of 23ha compared with its requirement for up to 19ha.

**Inspector's Question 3**

- 3. Will the identified job growth/floorspace requirements across the FEMA as a whole, and in Epping Forest District specifically, be met? In particular:**

**Response to Question 3**

31. Yes. At the FEMA level, a Memorandum of Understanding on the Distribution of Objectively Assessed Employment Need across the West Essex-East Hertfordshire Functional Economic Market Area (EB1203) has been agreed between the constituent Local Authorities as a commitment to meet the requirements identified within the West Essex and East Hertfordshire Assessment of Employment Needs (EB610).
32. Emerging and adopted Local Plans across the FEMA seek to meet the identified requirements in accordance with the agreed distribution. This is outlined in the Council's LPSV in paragraphs 2.48 to 2.52 and SP 2. See response to 3a below.

- a. Does the Plan seek to provide 10,800 jobs over the period 2011-2033 as indicated in paragraph 2.51?**

33. As per paragraph 2.51 of the LPSV, some 10,800 jobs will be provided for between 2011-2033.
34. The Council proposes a modification to point E of Policy SP 2 to set out how many new jobs are to be provided over the Plan period in as follows:

*"E. Within the period 2011-2033 the Local Plan will maximise opportunities provide for employment needs by jobs growth, with the aim of achieving a minimum of 10,800 new jobs in the District up to 2033. This will include making provision for:"*

The existing sub-paragraphs (i) to (iii) which follow from E remain unchanged.

**b. Where is the evidence that 2,900 jobs have already been provided during the period 2011-2016, leaving 7,900 to be provided over the period 2016–2033?**

35. This conclusion was drawn from the EEFM based analysis, but was also cross checked with available ONS data at the time of preparing the West Essex and East Hertfordshire Assessment of Employment Needs (EB610). Figure 3.6 (p 24) sets out the employment change for each five-year period. This shows the outputs of the moderated baseline indicating 2,900 additional jobs over the period 2011-16. At the time of preparing the assessment (EB610) an element of forecasting was included as official data for 2016 had not been released and the 2015 data would not have been available to the forecasters at the time the underpinning EEFM forecasts were prepared.
36. The ONS provides multiple sources of employment estimates each capturing slightly different aspects and often heavily rounded at the local area. The ONS Jobs Density measure provides the most comprehensive estimate of workforce jobs in an area. Analysis of timeseries data, available at the time of preparing the West Essex and East Hertfordshire Assessment of Employment Needs (EB610), for the period 2011-15 indicated a growth of 2,000 jobs ( $\pm 1,000$  due to rounding). The ONS Business Register and Employment Survey (BRES), a different measure of employment also indicated a growth of 2,000 jobs ( $\pm 1,000$  due to rounding) over the same period. ONS data for the period 2011-16 is now available and indicates a level of employment growth of 5,000 jobs ( $\pm 1,000$  due to rounding) on both of the stated measures.
37. The Council is satisfied that its figure of at least 2,900 jobs having been delivered from 2011 – 2016 is realistic and supported by all the available evidence.

**c. Table 2.5 on page 30 appears to cover the period 2011-2033, but the land requirements only cover the period 2016-33. Why is this? Will sufficient land be provided for the full 10,800 new jobs required over the whole Plan period?**

38. The Council proposes several modifications to Table 2.5 as outlined below, one of which clarifies that the land requirements in the table cover the period 2016-33.

**Table 2.5: Employment Land Requirements ~~2011-2033~~ 2016-33**

<b>The components of employment land requirement over the period <del>2011-2033</del> <u>2016-2033</u> are as follows:</b>	
Employment land (B uses) required 2016-2033 for offices	<b>2-5ha</b>
Employment land (B uses) required 2016-2033 for <u>industrial</u>	<b>14ha</b>
<u>Residual</u> <del>Remaining</del> requirement to be provided	<b>16-19ha</b>

39. The Council proposes a further amendment so that Table 2.5 is moved to be positioned between existing paragraphs 2.71 and 2.72 and that an additional sentence is added at the end of paragraph 2.71 stating as follows:

“Table 2.5 below outlines the employment land requirements for the District as reported in the October 2017 Functional Economic Market Area Assessment. These requirements take into account what has been delivered in the early part of the Plan period between 2011 and 2016.”

40. Sufficient land will be provided for the full 10,800 jobs required over the whole Plan period. During the period 2011-15 there were significant new employment floorspace permissions. EB610, Figure 4.9 (p 33) sets out historic Use Class B floorspace development for the period 2006-15 for Epping Forest District and within this the period 2011-15. This shows average annual gross floorspace completions of 11,910sqm across the District over the period 2011-15. This provided capacity for employment in the early part of the plan period. The residual requirement of 16-19ha for the period 2016-2033 will be met (and exceeded) by the approach set out within Part E of Policy SP 2 of the LPSV (p.32). This seeks to allocate 23 hectares of new employment land.

**d. Is it justified to rely upon the regeneration of existing sites to deliver approximately half of the future accommodation needs (paragraph 2.50)? Is there evidence to demonstrate that this will be effective?**

41. Yes, the Council contends that it is justified to rely upon the regeneration of existing sites as proposed and there is evidence to demonstrate that this approach will be effective. In the interests of clarity, the Council is proposing an amendment to the final sentence in paragraph 2.50 of the LPSV as follows to reflect that, as per the whole of paragraph 2.50, this is referring to the FEMA level:
- “... These figures take account of the fact that approximately half of the future accommodation needs at the FEMA level will be provided through the regeneration of existing office and industrial sites”.
42. Appendix 2 to the West Essex and East Hertfordshire Assessment of Employment Needs (EB610 pp 45-47) titled ‘Reuse of Land’ deals specifically with the veracity of assumptions for the regeneration of existing sites. This sets out analysis of historic monitoring records and considers future opportunities in Harlow in particular. Across the FEMA, the monitoring records indicate 54% of gross activity in the period 2011-15 was achieved through reuse of existing Use Class B sites and premises. This equates to 17,680 sqm per annum. The forecast analysis as set out in EB610, Figure 5.3 (p 36) indicates 52% of the estimated total requirement to be achieved through the re-use of Use Class B sites and premises. This equates to 20,570 sqm per annum. Whilst in absolute terms this is a modest increase in levels of re-use, this is primarily driven by high levels of re-use in Harlow underpinned by known redevelopment opportunities as set out at Figure A3.7 (EB610, p47).
43. For Epping Forest District, historic monitoring data shows that over the period 2006-15 there were average annual completions of B Use Class floorspace of 19,180 sqm. Of this, 34% (6,580 sqm per annum) was achieved through the redevelopment of existing Use Class B sites and premises. Over the period 2011-15 there was an increase in percentage terms, with 40% of completions achieved through the redevelopment of Use Class B sites and premises, equivalent to 4,770 sqm per annum. For forecasting purposes, it was assumed that 40% of gross completions could be achieved through re-use of land over the period 2016-33. In absolute terms, this equates to 2,790 sqm per annum, well below levels achieved historically as per the monitoring records. This is set out at p 46 of Wes Essex and East Hertfordshire Assessment of Employment Needs EB610 (penultimate paragraph). The Council’s designation of 53 existing employment sites in the LPSV (Paragraph 3.49) alongside Policy E1 A(i) provide a positive framework supporting the retention and enhancement of existing employment sites.

**e. Should Table 2.5 be amended to clarify that 14Ha of land is needed for industrial uses rather than offices?**

44. Yes, the Council agrees that Table 2.5 should be amended to clarify that the requirement for industrial employment land is 14ha over the period 2016-2033. The proposed modification is incorporated into the response to question 3c above.

**f. Should Policy SP2 set out how many new jobs are to be provided over the Plan period as well as how much land?**

45. The Council agrees that Policy SP 2 should set out how many new jobs are to be provided over the Plan period as well as how much land and therefore proposes a modification to point E of SP 2. This is detailed in the response to question 3a above.

***Issue 4: Is the Plan justified, effective and consistent with national policy in respect of the approach to meeting identified needs for retail development?***

**Inspector's Question 1**

1. Paragraph 3.53 of the Plan indicates that there is a net need for 39,700sqm of retail floorspace and that approximately 40% of that need will be met in Harlow. However, the Plan does not make any specific site allocations for the remaining 60%, or approximately 23,820sqm. In relation to this matter:

***Response to Question 1***

- a. To which period does the identified need for 39,700sqm of net additional floorspace relate?

46. The identified need for 39,700 sqm of net additional retail floorspace relates to the period 2016-2033 as set out in Table 9 of the Town Centres Review (2016) (EB1008) (p 21).
47. The retail need for the Plan period (plus two additional years - 2009 and 2010) is 59,700 sqm of floorspace. Paragraph 3.53 of the LPSV states that there is 'pipeline' development of some 20,000 sqm which, therefore, results in a residual demand for 39,700 sqm in the remainder of the Plan period. Section 3.3 of the Town Centres Review (EB1008) provides detail on pipeline supply.
48. It is recognised that the Local Plan evidence base does not directly correlate with the Plan period. The evidence base stems from the modelling undertaken for the Town Centres Study (2010) (EB1006) which addressed the period 2009-2031 and the Town Centres Review (2016) (EB1008) which extends the forecast period to 2033 to be consistent with the plan end date. For technical reasons the modelling within the Town Centres Review (2016) (EB1008) maintained the 2009 start point (see EB1008, section 3.1).
49. The Council proposes a modification to the sentence commencing on line 8 within paragraph 3.53 of the LPSV to clarify this matter as follows:

"The evidence suggests that retaining a constant market share is more realistic, and this identifies a need for up to 59,700 sqm of retail floorspace within the period 2009-2033".

**b. Is there evidence to demonstrate that 40% of this need will be met in Harlow during the relevant period?**

50. Yes, there is evidence to demonstrate that 40% of this need will be met in Harlow. Table 10 of the Town Centres Review (2016) (EB1008) (p 22) attributes the modelled demand for floorspace for Class A uses across the District's settlements. Broadly speaking it does this proportionally based on the share of residential development identified in the Site Selection Report (2016) (EB801) in each settlement (further details on the precise approach are provided in the paragraph preceding Table 10 of the Town Centres Review).
51. Harlow is included within Table 10 given the proximity of the town as a destination shopping centre for people who will be resident in the proposed Garden Communities (located within Epping Forest District) and surrounding villages. Modelling assumes that nearly 40% of A Use Class use floorspace will be provided in Harlow. This will include very local demand within the Garden Communities largely for convenience retailing but potentially for small amounts of other complementary A Use Class uses. This is supported by Policy SP 4, with further requirements for local centres within Garden Town Communities outlined in SP 5.
52. It is appropriate, also, to acknowledge that the Garden Communities will generate additional demand in Harlow town centre, which already functions as a sub-regional centre. There is commitment to ensure that the proposed Garden Communities are optimally knitted into Harlow's current fabric and Harlow recognises that the Garden Communities will help to create the critical mass to unlock the regeneration of the town centre. Administrative boundaries should not act as a barrier to the spatial planning for the Greater Harlow area and the clear functional economic linkages between the Garden Communities and Harlow town centre must be fully factored. The latter is fully reflected in the ongoing work of the Economic Development workstream of the Harlow and Gilston Garden Town. This group is one of a number of cross-border officer working groups which support the core Harlow and Gilston Garden Town Delivery Team.
53. The identified need to rejuvenate Harlow town centre and the wider economic growth aspirations for the town are evident in Harlow District Council's Corporate Objectives and its Local Plan Strategic Objectives. Paragraph 9.1 of Harlow's Local Plan Submission Version recognises that "the redevelopment and regeneration of the town centre is vital in supporting the overall sustainability and future vitality of the Harlow and Gilston Garden Town"<sup>8</sup>.
54. EFDC's approach in recognising the contribution to be made by Harlow is consistent with Harlow's LPSV which applies 'high growth' scenarios for both convenience and comparison floorspace capacity over the lifetime of its Plan. Policy RS2 (Future Retail

<sup>8</sup>

<http://www.harlow.gov.uk/sites/harlow-cms/files/files/documents/files/Harlow%20Pre-Submission%20Publication%20Local%20Plan.pdf>

Floorspace) in Harlow's 'Local Development Plan: Pre-Submission Publication' (at p 74) states that:

*“There is an identified need to provide up to 18,100sqm of comparison floorspace and up to 3,200sqm of convenience floorspace in Harlow up to 2026.*

*In order to plan for residential development coming forward in the Harlow and Gilston Garden Town beyond this period, an indicative requirement for up to 40,200sqm of comparison floorspace and up to 5,500sqm of convenience floorspace has been identified”.*

*A Town Centre Area Action Plan (HTCAAP) will be prepared for Harlow Town Centre. [...]*

*The HTCAAP will look to deliver a significant proportion of the retail floorspace requirements through site redevelopment and regeneration opportunities, and will identify the future retail floorspace capacity of the town centre*

*[...]”.*

**c. Why does the Plan not identify specific sites for the remaining 23,820sqm of necessary floorspace? Is this consistent with national policy in paragraph 23 of the NPPF?**

55. The residual requirement for Class A Use floorspace for the remainder of the District over the lifetime of the Plan period is considered to be relatively small; particularly when distributed across the higher order settlements within the District (as set out in the Town Centre Review EB1008, Table 10, p22). The Council is satisfied that its approach to planning for this remaining retail requirement, principally through Policy E 2 and requirements within strategic site allocations, is proportionate to the level of need.
56. Paragraph 3.54 of the LPSV outlines the Council's approach which is reflected in Policy E 2 and is consistent with paragraph 23 of the NPPF.
57. Chapter 5 of the LPSV articulates this commitment to the retail function of the two Town Centres and four Small District Centres within their respective Visions and place specific policies. In addition, larger residential-led developments (subject to Strategic Masterplans) within the remainder of the District make provision, as per Policy SP 3 ix, for retail development as part of the local and neighbourhood centres (e.g. South Epping Masterplan Area, North Weald Bassett Masterplan Area and Limes Farm Masterplan Area

58. The Council proposes a modification to Policy P 3 Waltham Abbey, (Waltham Abbey North Master Masterplan), paragraph N.(iv) (at p 129) to reflect that the Masterplan should include provision for retail use as follows:

“(iv) a new local centre ~~and~~ to include a community facility and retail use.”

59. Further, Appendix 6 of the LPSV sets out other locations where retail uses should be considered as part of residential-led development proposals. One such example is site allocation EPP.R3 Epping London Underground Car Park (pp 6-7), which includes the following requirement:

“Development proposals should consider incorporating retail uses at ground floor level in close proximity to the Epping London Underground Station forecourt”.

**d. Is any departure from national policy in this respect justified and how will the Plan ensure that this need is met?**

60. As stated above, the Council's approach is consistent with national policy and, as such, does not propose any departure from national policy.

**APPENDIX A: Examination documents referred to in this statement**

<b>Reference</b>	<b>Name</b>	<b>Author</b>	<b>Date</b>
19LAD0058	<a href="#">Representation on behalf of Martin Grant Homes, Persimmon Homes and Taylor Wimpey and Representation Martin Grant Homes and Harcourt Developments</a>	<i>Pegasus Group</i>	2018
EB1006	<a href="#">Epping Forest District Council Town Centres Study</a>  Note: because of the size of this document it is split into different downloads. The link above is to the Contents page. For individual chapters select Places on the <a href="#">Evidence Base homepage</a>	<i>Roger Tym</i>	May 2010
EB1008	<a href="#">Town Centres Review</a>	<i>Arup</i>	September 2016
EB1202	<a href="#">Memorandum of Understanding on Distribution of Objectively Assessed Housing Need across the West Essex/East Hertfordshire Housing Market Area</a>	<i>SHMA authorities</i>	March 2017
EB1203	<a href="#">Memorandum of Understanding on Distribution of Objectively Assessed Employment Need across the West Essex/East Hertfordshire Functional Economic Market Area</a>	<i>Cooperation for Sustainable Development Officer Group</i>	May 2018
EB1506	<a href="#">Report on the Examination of the East Herts District Plan 2011-2033</a>	<i>The Planning Inspectorate (PINS/J1915/429/1)</i>	July 2018
EB1600	<a href="#">Housing Background Paper</a>	<i>EFDC</i>	October 2016
EB203	<a href="#">Sustainability Appraisal of Strategic OAHN Spatial Options</a>	<i>AECOM</i>	September 2016
EB204	<a href="#">Sustainability Appraisal for the Epping Forest District Plan</a>	<i>AECOM</i>	December 2017
EB402	<a href="#">Epping Forest District Council Gypsy, Traveller and Travelling Showpeople Accommodation Assessment. Need Summary Report</a>	<i>Opinion Research Services</i>	September 2017

EB402A	<a href="#">Activity on Sites for Traveller and Gypsy Accommodation GTAA to LPSV</a>	<i>Opinion Research Services</i>	<i>September 2017</i>
EB405	<a href="#">West Essex and East Hertfordshire Strategic Housing Market Assessment</a>	<i>Opinion Research Services</i>	<i>September 2015</i>
EB406	<a href="#">Updating the Overall Housing Need based on 2014-based projections for West Essex &amp; East Herts</a>	<i>Opinion Research Services</i>	<i>August 2016</i>
EB407	<a href="#">Strategic Housing Market Assessment Establishing the Fully Objectively Assessed Need</a>	<i>Opinion Research Services</i>	<i>July 2017</i>
EB409	<a href="#">Economic Evidence to Support the Development of the OAHN for West Essex and East Herts</a>	<i>Hardisty Jones Associates</i>	<i>September 2015</i>
EB600	<a href="#">Economic and Employment Evidence to Support the Local Plan and Economic Development Strategy</a>	<i>Hardisty Jones Associates</i>	<i>September 2015</i>
EB600B	<a href="#">Economic and Employment Evidence to Support the Local Plan and Economic Development Strategy- Appendix 2: Evidence Base Review &amp; Consultations</a>	<i>Hardisty Jones Associates</i>	<i>September 2015</i>
EB603	<a href="#">Employment Review</a>	<i>Hardisty Jones Associates</i>	<i>December 2017</i>
EB610	<a href="#">West Essex and East Hertfordshire Assessment of Employment Needs</a>	<i>Hardisty Jones Associates</i>	<i>October 2017</i>