

EXAMINATION OF THE EPPING FOREST DISTRICT LOCAL PLAN – 2011 – 2033

EXAMINATION STATEMENT ON BEHALF OF THE EPPING FOREST HOUSING FORUM

Matter 3 – Quantitative Requirements for Development

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16 January 2019

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EXAMINATION STATEMENT ON BEHALF OF EPPING FOREST HOUSING FORUM

Matter 3 – The Quantitative Requirements for Development

16 January 2019

1.0 Introduction

- 1.1 This Examination Statement provides a response on behalf of the Epping Forest Housing Forum ("the Forum"), to those Questions raised by the Inspector (dated November 2018), relating to the Calculation of the Objectively Assessed Need for Housing ("OAN") contained within the Epping Forest District Local Plan 2011 – 2033 ("the Plan") and its supporting evidence base.
- 1.2 In addition to the above, this Statement specifically highlights which areas of the Plan are considered to be unsound, and the basis upon which it fails the tests of soundness, and the changes sought.
- 1.3 This Statement has been prepared jointly by Neame Sutton and RPS on behalf of the Forum.

2.0 Matter 3 – Quantitative Requirements for Development

HMA:

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?

- 2.1 The housing market area (defined as the 'West Essex and East Hertfordshire') comprises four authorities including Epping Forest (Epping). The evidence underpinning this is set out in the West Essex and East Hertfordshire Strategic Housing Market Assessment (September 2015)¹ prepared on behalf of these LPAs by Opinion Research Services Ltd (ORS). The proposed grouping is suggested to represent the most appropriate 'best fit' for West Essex and East Hertfordshire², based on analysis of available evidence.
- 2.2 The Forum does not raise any principle objections regarding the boundary of the HMA as proposed. Nonetheless, it should be recognised that, even on the Council's own evidence, there are very strong commuting and migration linkages between the HMA and adjoining market areas, most notably London. This is not surprising given the geographical relationship between

¹ Examination Document EB405

² Paragraph 2.73 of EB405

the HMA and the conurbation, especially in the case of Epping, which should be properly reflected in the calculation of the OAN.

- 2.3 In the context of the London Boroughs the Forum considers that very little account has been taken of their influence on Epping Forest by the Council. This is particularly evident in the context of the housing requirement for the Plan period.
- 2.4 There are two key influences on the District that should be catered for within the Plan:
- Influence 1 – The pressure placed on the District by its proximity and connectivity to London, which consequently increases demand for housing and in turn has an upward influence on the affordability ratio; and,
 - Influence 2 – The unmet need that will inevitably arise from London (despite the suggestion by the Mayor that the new London Plan will meet its full OAN the draft document clearly confirms that unmet need will arise³).
- 2.5 Neither the SHMA or the Plan as drafted makes any allowance for the influence that London will have on the need for housing in the District. This is a clear failing of the Plan. It is also noted that there is no indication that any discussions have taken place with the neighbouring London Boroughs to agree the approach to be taken regarding unmet need under the Duty to Cooperate ("DTC"). Whilst reference is made to three London Boroughs in the DTC Statement (EB119)⁴ the corresponding Memorandum of Understanding ("MoU") (EB1202) has not been prepared with any input from the London Boroughs⁵. The Council cannot possibly suggest that this key influence has been considered and addressed.
- 2.6 In the Forum's view the close relationship between the District and London will have a direct impact on the housing need in the District. This is a common factor considered by a number of Inspectors recently in the context of Local Plan Examinations for those Districts and Boroughs surrounding London. We address the 'London issue' as it relates to Epping in more detail below (under question 2b).

³ Shortfall of 1,065 dpa against the SHMA requirement of 66,000 dpa as confirmed at Table 4.1 and Paragraph 4.1.1 of the draft new London Plan – 13 August 2018 - https://www.london.gov.uk/sites/default/files/draft_london_plan_-_showing_minor_suggested_changes_july_2018.pdf

⁴ Paragraph 3.2 on Page 3 of DTC Statement – EB119

⁵ Paragraph 5.1 on Page 17 of MoU – Distribution of OAN across the West Essex/East Hertfordshire Housing Market Area – EB1202

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 dpa.

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

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

- 2.7 The Forum does not support the approach proposed by the Council, which is not soundly based and is inconsistent with planning guidance. It is noted that the provisions of the standard methodology referred in the Inspector's question is not applicable to the Epping Forest Local Plan, which operates as a transitional authority under paragraph 214 of the 2018 NPPF.
- 2.8 The appropriate and correct methodology to be applied in the calculation of the OAN for the HMA, including Epping, is set out in the earlier version of the Planning Practice Guidance (PPG), which covered Housing and Economic Development Assessments⁶, dated 20th March 2015. The references quoted in this submission relate to that guidance specifically.
- 2.9 The 2014 PPG defines a number of factors that should be followed when calculating the OAN, and these are summarised below:
- Step 1a: CLG/ONS Population and Household Projections (the 'starting point');
 - Step 1b: Consideration of local migration trends (taken from the latest population projections);
 - Step 1c: Adjustment for Suppressed Household Formation Rates;
 - Step 2: Employment Trends and Forecasts; and
 - Step 3: Adjustments Responding to Market Signals.
- 2.10 In addition to these steps, consideration should also be given to the scale of affordable housing need (the OAN for affordable housing) at the local area and address how the FOAN can properly address these needs (referred to here as 'Step 4'). This is consistent with *Satnam Millennium Ltd*⁷.
- 2.11 The Forum has reviewed in detail the key components of Epping Forest's OAN in respect of the PPG steps and guidance summarised above. This we set out in a separate technical review paper titled *Epping Forest Housing Need Technical Review* (Section 2 to 5 refers) prepared by RPS on behalf of the Forum (**Appendix 1** to this submission). This submission will cross-reference to the paper in support of this statement, as appropriate. Additionally, RPS has also independently modelled the OAN for Epping Forest (see Section 6 of the technical paper), which arrives at a robust calculation of OAN, appropriate for the purposes of policy formation in the Local Plan.

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

⁷ *Satnam Millennium Limited v Warrington Borough Council* [2015] EWHC 370 (Admin), paras 39-43.

Step 1a: Demographic and household-projection based estimate of housing need

- 2.12 Our critique of the Council's consideration of the baseline projections ('starting point') is set out in more detail in section 2 of the technical review paper (paragraph 2.1 to 2.5 refers). To reiterate our position, the Forum consider that the 2014-based projections represent an appropriate starting point for the consideration of how the OHN is calculated. The 2016-based household projections published on 20 September 2018 represent the most recent published information, however there are clear concerns with using this data. The 2016-based household projections represent a significant shift in household growth from previous projections, and a number of authorities have seen numbers markedly drop. This was, in part, anticipated by the Government, who issued a clear health warning with the 2016-based projections and how these should be used in the context of the 'standard method' for calculating housing need. The Government's concerns were principally linked to whether these were capable of achieving growth of around 300,000 dwellings per annum, consistent with the national policy objectives.
- 2.13 Things have now moved on and these concerns have been realised by the Government following the publication of the 2016-projections. On 26th October 2018, the Government issued its Technical Consultation on changes to national planning guidance including revisions to the standard method for assessing housing need to be consistent with increasing housing supply. The Government considers that the 2014-based data will provide the demographic baseline for assessment of local housing need in the short-term. The Forum agrees with this approach as a sensible and reasonable way forward in terms of defining an appropriate starting point for the assessment of local housing need for Epping Forest. The 2016-based projections should therefore not be relied upon in any way.
- 2.14 The modelling undertaken by RPS utilises the 2014 demographic and household projections, published by the Office of National Statistics (ONS) in May 2016, which has been updated to account for revisions to subsequently published population estimates.

Step 1b: Consideration of local migration trends

- 2.15 The Council has considered past trends in migration across the four HMA authorities and our critique of this approach is set out in more detail in section 2 of the technical review paper (paragraph 2.11 to 2.17 refers). To reiterate our position, the PPG makes clear that any local changes in migration assumptions that differ from those underpinning the 2014-based projections need to be clearly explained and justified⁸, given that those assumptions are themselves derived from past trends (in this case covering the period 2009-2014).
- 2.16 The Council has applied a 'local migration adjustment' that reduces the demographic-based estimate of need for Epping from 14,374 to 10,568 dwellings, a reduction of 3,806 dwellings

⁸ PPG Paragraph: 017 Reference ID: 2a-017-20140306 Revision date: 06 03 2014

(representing a 26% discount). Underpinning this reduction is the use of a ten-year migration trend covering the period 2005-2015. As discussed in our technical review, we do not agree with this approach and suggest that the Council has sought to build into its projections the negative impacts of the recessionary period following 2007/8 financial crisis, which saw a reduction in migration into Epping between 2008 and 2012 (figure 2.1 of our technical review refers). Similar concerns were raised by the Aylesbury Local Plan Inspector (paragraph 2.16-2.17 of the technical review refers) with regards to the migration trends applied in the calculation of the OAN for Aylesbury and the insufficient levels of migration assumed within their projections.

- 2.17 To apply such a drastic reduction in this way is not justified and runs counter to recent (upward) trends in migration seen in Epping since 2012, the result being that insufficient migration has been accounted for in the Council's demographic-based projections. Consequently, in this case the Forum favour the use of the migration assumptions within the 2014-based sub-national population projections as a suitable basis for a demographic-based starting point.

Step 1c: Adjustment for Suppressed Household Formation Rates

- 2.18 RPS provides a critique of the Council's approach to household suppression in section 2 of our technical review paper (paragraph 2.19-2.23 refers). The PPG is very clear that any adjustment to household formation rates (HFRs) resulting from the household suppression not captured in past trends should be applied to the underlying household projections⁹. However, the Council has applied an allowance of 181 dwellings (or 8 dpa) based on concealed households and homelessness figures derived from Census 2011. The Forum does not agree with this approach as it is clearly contrary to the advice set out in the PPG, which makes little attempt to address the clear household suppression that has occurred in the District.
- 2.19 In response, we consider that an analysis of past rates within previous projections for those cohorts most likely to form new households (the 25-44 age cohorts) indicates that adjustments should be made to the 2014-based HFRs as part of the demographic-based projection. This would accord with the PPG advice and gives a clearer view on the impact such adjustments will have on the estimated housing need.
- 2.20 Consequently, RPS has applied an adjustment for household suppression, resulting in a change to the projected housing need in Epping (this is set out in more detail in section 6 of our technical review paper). This applies an upward adjustment to the household-based estimate of housing need OAN for Epping Forest to 709 dpa.

Step 2: Employment Trends and Forecasts

- 2.21 RPS provides a critique of the Council's approach to employment trends and forecasts in section 3 of our technical review paper. The PPG advice requires plan-makers to assess the likely change in job numbers based on past trends and/or economic forecasts as appropriate [our emphasis],

⁹ As stated in PPG Paragraph: 015 Reference ID: 2a-015-20140306 Revision date: 06 03 2014

and also have regard to the growth of the working age population¹⁰ to ensure that there are sufficient workers to supply the future growth in jobs.

Employment Trends and Forecasts

- 2.22 As discussed in more detail in our technical review paper, we have some fundamental concerns with the approach taken in the consideration of employment growth in Epping Forest, and across the HMA as a whole. The Forum does not consider that the Council has robustly considered the balance of likely future jobs and workers, and whether there is sufficient housing planned to satisfy future job increases.
- 2.23 Firstly, in terms of a methodology, the evidence base (EB405) utilises a single forecast derived from the 2014 East of England Forecasting Model (2014 EEFM). The 2014 EEFM incorporate the 2012-based sub-national population projections, which also been superseded by the 2014-based projections. On this basis alone, we raise concerns as to the credibility of the evidence underpinning the jobs growth set out in the Epping Forest Local Plan (c.10,000 new jobs between 2011 and 2033), which we suggest are now out of date.
- 2.24 Secondly, the 2014 EEFM forecasts have now been superseded by two more recent forecasts (for 2016 and 2017). However, even if the more recent EEFM forecasts are considered within the OAN, we have concerns with those forecasts as they relate to Epping Forest. As shown in figure 3.1 of our technical review paper, it is clear that the EEFM forecasts of future jobs change (from 2017 onwards) suggesting that future growth will stagnate up to 2033, as part of an average rate of employment growth of only 0.6%¹¹. This is very different to the change in jobs observed in the past, which presently stands at 1.46%¹². However, there is no justification anywhere in the Council's evidence that those forecasts are likely to happen in reality and why past growth rates will not continue to occur. Given our concerns, we consider that greater emphasis needs to be given to past trends, in line with the PPG.
- 2.25 Thirdly, as discussed in paragraph 3.13 of our technical review paper, no comparator forecasts have been used, which raises further concern as to the credibility of the Council's evidence relating to employment trends and forecasts due to the reliance on a single data source.
- 2.26 Consequently, we consider that past trends in employment growth are a useful and more appropriate basis for considering the likely future growth in jobs and impact this might have on labour supply and the demand for new homes in Epping. In doing this, we have utilised figures available from NOMIS¹³ up to 2017 as a more appropriate data source in this case.

¹⁰ PPG Paragraph: 018 Reference ID: 2a-018-20140306 Revision date: 06 03 2014

¹¹ Compound Average Growth Rate (CAGR) taken from 2017 EEFM Forecasts

¹² CAGR taken from NOMIS over the period 2000-2016

¹³ <https://www.nomisweb.co.uk/>

Balancing labour supply and job demand

- 2.27 In order to translate the economic forecasts (whichever are used) into a detailed understanding of the future workforce, it is necessary to factor in, as appropriate, assumptions relating to economic activity, commuting and unemployment, and double-jobbing. We set out our critique of the Council's approach to dealing with these assumptions in paragraphs 3.19-3.27 of our technical review paper.
- 2.28 To reiterate our position, whilst the Council's latest evidence (EB405) provides some commentary on these assumptions, it should be noted that these are considered at the HMA-wide level, and not at the level of individual authority. Consequently, it is not clear, for example, what commuting ratios have been applied to the projected population in Epping. This is important as the projected number of workers needed to supply the necessary labour to meet future job demand is highly sensitive to changes in the commuting ratio. This is also the case for the other assumptions highlighted here. We therefore suggest that further clarification is needed as to what assumptions have been applied at the local authority level, and where these are sourced from, in order to justify the Council's position regarding the balance of future jobs and workers in Epping.
- 2.29 The approach taken by RPS in applying appropriate assumptions to its own projections is set out in Section 6 of our technical review paper. These include the use of economic activity rates available from the Office for Budgetary Responsibility, as well commuting and unemployment figures derived from census 2011, which are considered more robust than the Council's assumptions.

Step 3: Adjustments Responding to Market Signals

- 2.30 RPS provides a critique of the Council's approach to dealing with market signals in Section 4 of our technical review paper. The fundamental concern is that the Council has sought to move away from earlier published market signal adjustments (20%) advocated in previous versions of the SHMA, which were higher than now proposed in the latest evidence (now 13.6% for Epping set out in the 2017 SHMA). This has been done in the face of clear evidence that would justify a much greater uplift to the OAN, as argued in our technical review paper (paragraph 4.20-4.25 refers). Furthermore, it is not clear what the justification is for the Council's change of mind, suggesting that the reduction has been made for reasons as yet unknown. As a result, the suggested uplift of 1,508 dwellings (bringing the suggested OAN up to 12,573 dwellings) is not justified, or appropriate.
- 2.31 It is noted that affordability concerns in the district are severe, and current workplace affordability ratios sit at 16.08 times house prices to earnings. This position has significantly worsened since 2011 (where the position was 10.6) and markedly higher than neighbouring authorities. The supporting appendix draws on a number of examples of how upward adjustments have been made to the OAN calculation to support worsening market signals

(paragraphs 4.26-4.27) and it is considered that there is justified support for increasing this provision beyond the 12% advocated by the Council.

- 2.32 Consequently, we would recommend that the latest market signals uplift is adjusted upwards so that it can make a meaningful response to affordability through the supply of additional housing. RPS considers that an adjustment of 25% as a market signals uplift is more likely to make a meaningful difference to affordability than the 13.6% proposed for Epping.

Affordable Housing Need (Step 4)

- 2.33 RPS provides a critique of the Council's approach to affordable housing need in section 5 of our technical review paper. To reiterate, we do not agree with the approach taken to assessing the ability (or inability) of current and future households to afford market housing, which appears to rely only on data relating to households in receipt of housing benefit (derive from DWP figures). This is contrary to the PPG advice, which suggests that plan-makers should estimate the number of households from other tenures in need and those that cannot afford their own home¹⁴. We suggest that a proportion of those households in Epping not in receipt of housing benefit are also likely to be unable to afford their own homes, however this is not presented in the Council's evidence as part of the calculation of gross unmet need. We suggest that the scale of gross unmet need is likely to be considerably higher than the figures presented in the Council's evidence, which would then increase the net affordable need (OAN for affordable housing).
- 2.34 Consequently, the Forum suggests that the Council revisits its assessment of affordable housing need as part of the examination process. By doing so, this may suggest that an adjustment would need to be made in light of the true scale of affordable housing need in Epping.

Summary of Forum Position on the OAN for Epping Forest

- 2.35 The Forum has followed the above steps in calculating the OAN for Epping Forest, which is outlined as part of the accompanying technical appendix (**Appendix 1**). Consequently, the Forum considers the OAN for Epping Forest to be 886dpa over the Plan period, as identified in the table below. This is higher than the Council's OAN of 572dpa, though lower than the calculation of local housing need under the Government's *standard method*, which would identify a need of 1,183dpa. The Forum considers the OAN of 886dpa to be robustly based, and appropriate in the context of the 2012 NPPF and 2014 PPG.

¹⁴ PPG Paragraph: 024 Reference ID: 2a-024-20140306 Revision date: 06 03 2014

Summary Table of Forum Derived OAN

		Dwellings Growth	Dwellings Per annum
RPS 1	Demographic OAN	13,816	628
RPS 2	Employment OAN	18,854	857
RPS 3	Market Signals OAN	19,492	886
	Forum Derived OAN	19,492	886

a. 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?

- 2.36 RPS provides a critique of the Council's approach to dealing with London's housing need in section 8 of our technical review paper (paragraph 8.1-8.5 refers). We wish to reiterate two key concerns we have with the current approach taken through the preparation of the SHMA. Firstly, the latest evidence (2017 SHMA) does not consider the matter of addressing the housing needs of London through the potential for a contribution towards that need within the HMA or at Epping specifically, and so no specific allowance is made for any of London's housing need. On the basis of the Council's own evidence, which suggests that strong linkages between the HMA and London, this is not a credible approach. This raises wider issues regarding the Duty to Cooperate and the soundness of the Plan. The Courts have helpfully clarified that failure to comply with the Duty can lead to concerns regarding soundness¹⁵. This is considered further in the Forum Matter 1 submission.
- 2.37 Secondly, other nearby authorities do include a contribution towards London's needs despite exhibiting relatively weaker linkages to the Capital. For example, the Local Plan Inspector in Ashford¹⁶ recommended (at paragraph 49 of that report) a specific uplift (of 546 dwellings) within the OAN to account, "...for positive net flows of households from London to Ashford...". In addition, other areas in close proximity to London have also recently included specific allowances (e.g. Waverley).
- 2.38 RPS has provided an analysis comparing Epping with Ashford and, as shown in Table 8.2 of our technical review paper, the migration flows between London and Epping are considerably stronger (three times as large for moves from London to Epping) compared to Ashford.
- 2.39 Consequently, the Forum are concerned that insufficient regard has been given to the housing need of London and, on that basis, the Council's suggested OAN is not justified.

¹⁵ *St Albans DC v SoS* [2017] EWHC 1751 (Admin), para. 59

¹⁶ <https://www.ashford.gov.uk/planning-and-building-control/planning-policy/local-plan-to-2030/local-plan-2030-examination/>

- 2.40 When the most recent evidence for the emerging Local Plan is considered¹⁷ in terms of the 10 year housing targets for the three London Boroughs the Council considers to be of most relevance¹⁸ it is apparent that there is already a substantial unmet need arising particularly in relation to London Borough of Redbridge that has recently adopted a Local Plan in March 2018. The other two authorities have yet to progress their Local Plans and therefore the extent of the potential unmet need is unknown.
- 2.41 In the case of Redbridge the extent of unmet need arising from its adopted housing requirement (Policy LP2¹⁹) when compared with the emerging London Plan 10 year housing target is some 8,560 dwellings. This shortfall, in a neighbouring Borough, is significant and clearly points to a need for some allowance to be made in this Plan.

What is the relevance of the OAN figure of 13,278 for Epping Forest DC referred to in paragraph 6.8 of the SA?

- 2.42 In short terms the Forum would like to understand why this figure has been referenced in the SA as well because it neither corresponds to the demographic starting point that ORS on behalf of the Council identify using the 2014-based household projections²⁰ (15,049 dwellings) nor does it correspond with the figure that ORS identify as the full OAN for the Plan period²¹ (12,573 dwellings) nor does it reflect the housing requirement that the Council is actually proposing in the Plan²² (11,400 dwellings).
- 2.43 The Forum reserves its right to respond on this point further at the Examination once it has reviewed the Council's answer to this question.

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?

- a. Has the alternative of delivering the OAN been tested through Sustainability Appraisal? If not, is the SA process deficient?***
- 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?***
- 2.44 In short terms the answer to this question is no. The Council is required by the Framework 2012 (Paragraph 47) to plan for the full OAN of the HMA. The Council has not done that.

¹⁷ London Plan Matter 19 Supplementary Questions and Mayor's Answers dated 14 January 2019 – Paragraph 3 - https://www.london.gov.uk/sites/default/files/nlp_ex_13_gla_response_to_matter_19_-_supplementary_question_-_inner_and_outer_london_boroughs_140119_final.pdf

¹⁸ See DTC Statement – Paragraph 3.2 on Page 3 – EB119

¹⁹ Redbridge Local Plan 2015 – 2030 (adopted March 2018) - https://www.redbridge.gov.uk/media/4934/10-redbridgelocal-plan_070318_web-1.pdf

²⁰ Paragraph 2.2 on Page 9 of ORS Review of OAN – July 2017 – EB407

²¹ Figure 5 on Page 25 of ORS Review of OA – July 2017 – EB407

²² Policy SP2 on Page 31 of the Submission Version of the Plan – EB114

- 2.45 The MoU confirms that the Council has failed in its duty under Paragraph 47 by proposing a housing requirement of 11,400 dwellings against an OAN of 12,573 dwellings²³. The Council presents no evidence for why it has taken this approach. Equally the Council cannot argue that the unmet need arising from its approach is being met elsewhere because the MoU confirms the constituent authorities within the HMA will not be meeting the OAN identified for the HMA as a whole. This unmet need equates to 610 dwellings, and is based on the difference between the OAN 51,710 dwellings (set out in the latest update to the SHMA²⁴ published in 2017) and the preferred 'spatial option' of 51,100 dwellings chosen as the basis for the Memorandum of Understanding (MoU) signed by the four authorities in March 2017²⁵.
- 2.46 With regard to Appendix 5 of the Plan the Council purport to be delivering a total of 13,152 dwellings over the Plan period in its housing trajectory. Whilst the detail of the housing trajectory is dealt with in the Forum's Statement for Matter 6 the key point to note here is that the Council cannot 'have its cake and eat it'. If the Council seeks to rely on a housing delivery trajectory that purports to deliver 579 dwellings over and above the OAN of 12,573 dwellings identified in the SHMA 2017 then it cannot possibly argue that the housing requirement figure in the Plan should be reduced below the OAN as currently proposed.
- 2.47 This is reason enough to support the housing requirement figure being aligned to the OAN as a minimum (notwithstanding the Forum's view that the OAN is incorrect and should be adjusted).

²³ Figure 5 on Page 25 – ORS Review of OAN July 2017 – EB407

²⁴ EB407, figure 5

²⁵Memorandum of Understanding on Distribution of Objectively Assessed Housing Need across the West Essex/East Hertfordshire Housing Market Area March 2017, Between East Hertfordshire District Council Epping Forest District Council Harlow District Council Uttlesford District Council (Document ref. EB1203)

3.0 Changes Sought

3.1 The Forum seeks the following changes to the Plan:

1. Increase the OAN to reflect the correct need identified by RPS of 886 dpa (19,492 dwellings 2011 – 2033);
2. Include an allowance for unmet need arising from London of at least 546 dwellings;
3. Include an allowance for unmet need arising from elsewhere in the HMA of at least 610 dwellings;
4. Amend to the Plan to allocate sufficient land for the following Housing Requirement:

Dwellings	
OAN	19,492
Unmet Need London	546
Unmet Need HMA	610
TOTAL HOUSING REQUIREMENT (2011-33)	20,648 (938 dpa)

5. Undertake update to SA to full test the above scenarios.
-