

Epping Forest District Council Local Plan Examination

**Clare Hutchinson on Behalf of
Mr. Graeme Watt
(19LAD0024)**

**Hearing Statement
Matter 6: Housing Supply**



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1.0 INTRODUCTION

- 1.1 This hearing statement is on behalf of Mr Graeme Watt, owner of omission sites SR-0313-A1, SR-0313-B1 and SR-0313-C1, situated adjacent to the eastern development boundary of Lower Sheering and adjoining allocated site LSHR.R1.
- 1.2 I confirm I am making written representations only to matter 6 and am not seeking attendance at the hearing session itself.

2.0 ISSUE 2: WILL THE PLAN ENSURE THAT THERE IS A REASONABLE PROSPECT OF A FIVE-YEAR LAND SUPPLY BEING ACHIEVED UPON ADOPTION AND THROUGHOUT THE LIFETIME OF THE PLAN AS REQUIRED BY PARAGRAPH 47 OF THE NPPF

- 2.1 The plan will not provide a 5 year supply of deliverable housing sites against the housing requirement as required by paragraph 47 of the NPPF.
- 2.2 The housing requirement figure of 11,400 stated in the LPSV is not the most up to date OAHN for the district. The Housing Implementation Strategy Update (EB410A) states at paragraph 2.3 that, *“The Strategic Housing Market Assessment 2017 provides the most recent OAHN for housing. This identifies a need for 57,700 dwellings (including 12,573 dwellings in Epping Forest) over the 22-year period 2011-2033.”*
- 2.3 The 2017 SHMA was found by the East Herts District Plan Examination Inspector to be a sound basis for the calculation of housing need in the HMA in 2017/18.
- 2.4 The Council set out no reason why the Plan should not meet the full OAHN and in fact the LPSV seeks to allocate sites to provide 13,103 homes during the plan period. As such, for the purposes of calculating a 5 year supply of housing against the housing requirement, the starting point housing requirement figure should be 12,573, equating to 572 dwellings per annum.
- 2.5 The shortfall in delivery during the 7-year period ending with the monitoring year 2017/18 is therefore 2,148 dwellings rather than the Council’s stated figure of 1,770. This is a substantial shortfall. The LPSV proposes to meet this over the lifetime of the Plan rather than during the first five years. The 2017 Housing Implementation Strategy



(EB410) sets out at paragraph 2.11 three reasons why meeting this shortfall in the first 5 years of the Plan is not considered appropriate. As set out in our regulation 19 representations (in response to policy SP2), we do not consider the reasons given to be justified.

- 2.6 2012 NPPF paragraph 47 bullet 2 provides that in the case of persistent under-delivery a buffer of 20% should be applied to the annual requirement figure, “...to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land.” This is not to ‘punish’ to local authority for past poor performance, but to ensure latent unmet need, which causes recognised social and economic problems, is eliminated as quickly as possible.
- 2.7 Table 2 of the 2019 Housing Implementation Strategy Update (EB410A) sets out that delivery has been less than the full OAHN since 2011. This constitutes ‘persistent under delivery’ and a 20% buffer should be applied. The 2017 Housing Implementation Strategy (EB410) indicates that a 20% buffer is inappropriate because (paragraph 2.14) the absence of an up-to-date Local Plan and local constraints including the extent of Green Belt coverage and the wider economic conditions as a result of the recession.
- 2.8 The 2017 Housing Implementation Strategy fails to acknowledge that the more expedient delivery of a new Local Plan, a matter under the full control of the Council, would have remedied this situation sooner. It is not tenable to argue in a district as economically buoyant as Epping Forest that delivery has been prevented by economic circumstances. The Council’s record on housing delivery is poor and it is appropriate to apply a buffer of 20%.
- 2.9 Using the full OAHN of 572 dwellings per annum, adopting a 20% buffer and spreading the shortfall over the first five years of the Plan period, shows that the submission plan provides for only a 2.3 year supply of housing during the first five years of the Plan, a substantial shortfall equating to 3,234 dwellings.
- 2.10 The 2019 Housing Implementation Strategy Update seeks to justify the stepped approach, citing the guidance in the NPPG. Whilst a stepped approach may be appropriate, this should only be used if the plan making process has exhausted the



supply of deliverable sites. This is acknowledged within the 2019 Housing Implementation Strategy Update, where paragraphs 4.7 – 4.13 set out potential actions to boost housing delivery in light of the lack of a five-year supply. One action is the identification of new deliverable sites. The reason for not identifying new sites is stated to be that meeting the entire quantum of the shortfall through the allocation of new sites would require further technical assessment, consideration of individual and collective impacts and consultation; which would delay the adoption of the Local Plan.

- 2.11 We do not consider it is a tenable position to argue that no further deliverable sites should be allocated because the shortfall is too great to be met in its entirety. Given the extent of the shortfall every effort should be made to at least reduce it where possible.
- 2.12 Additional small-scale deliverable sites, or extensions to existing allocated sites, could be allocated without significant individual or collective impacts. Moreover, allocating such sites and consulting on these via the major modifications procedure would not result in a significant period of delay.
- 2.13 The housing land supply situation in the early years of the Plan period could be more acute than set out above given the additional information contained within the Council's recently published trajectory for the LPSV site allocations contained within Appendix 6 of the 2019 Housing implementation Strategy Update (EB410A). The commentary in the table notes a number of existing uses are in situ on sites that are expected to contribute to supply in the first five years, namely LOU.R11, LOU.R4, EPP.R6, EPP.R7 and BUCK.R2. We would question whether the presence of these existing uses means these sites fulfil the requirement to be 'available now', as set out in the definition of deliverable sites at NPPF footnote 11.