

1. INTRODUCTION

- 1.1 This Statement is submitted by Meridian Hill (Chigwell) Ltd (Participant Ref 19LAD0102) and relates to Matter 6: Housing Supply, including sources of Supply; the Housing Trajectory; and the Five Year Supply.
- 1.2 Meridian Hill (Chigwell) Ltd have an interest in the former landfill site at Hill House Farm, Chigwell. The site abuts the existing built up area and it is in close proximity to existing local facilities, services and public transport. It is owned by Essex County Council. This site is promoted for residential development of c100 dwellings, provision of a Care Home and public open space. The site is available, and is deliverable in the short term.

2. MATTER 6: HOUSING SUPPLY, INCLUDING SOURCES OF SUPPLY; THE HOUSING TRAJECTORY; AND THE FIVE YEAR SUPPLY

Issue 1: Will the Plan provide a land supply sufficient to deliver the housing requirement of at least 11,400 dwellings over the Plan period?

1. Table 2.3 on page 29 sets out the different components of the housing land supply for the period 2011-2033. Is data on housing completions and extant planning permissions now available up to 31 March 2018? If so, should the table be updated to reflect this? Should the table indicate how much housing is expected to be provided through allocations outside the Garden Communities? Should it be made clear whether the total housing supply for the Plan period will be above or below the requirement?

- 2.1 The Housing Implementation Strategy (HIS) Update 2019 (EB410A) provides the Council's updated position on Housing Supply. This includes an update on the housing completions and extant planning permissions.
- 2.2 There is a difference in the figures in the HIS Update, and those in Table 2.3 of the Epping Forest Local Plan Submission Version 2017 (EFLP). It is considered the figures contained within Table 2.3 of the LPSV are misleading, as it is not clear the overall supply figure.
- 2.3 It is recognised that Paragraph 2.77, and Appendix 5, of the EFLP, indicates that, in the Council's view, the planned supply exceeds the identified requirement, however it is clear this is to reflect a contingency to allow for flexibility. Nonetheless the supply should be clearly identified.
- 2.4 Overall, it is considered that the figures contained within Table 2.3 of the EFLP are misleading as it does not show whether the Council is meeting its housing in delivering the total number of houses for the Plan period. It should also be clear how the supply compares to the actual identified OAN figure. If there is a shortfall, which appears to be the case, then this will have a knock on effect on future housing requirement and supply for the District.

2. Policy SP2(c) indicates that additional housing could be delivered through Neighbourhood Plans and on rural exception sites in accordance with Policy H3. Is it possible to quantify this contribution and should it be reflected in Table 2.3?

- 2.5 It is not considered possible, reasonable, or appropriate to quantify contributions from additional housing that could come forward through Neighbourhood Plans or rural exception sites.
- 2.6 In relation to Policy H3 and Rural Exception Sites, the policy is clear that small scale affordable housing schemes will only be allowed if there is a clearly and evidenced local need, and specific criteria is met within the policies. Unless this information is known and evidenced it would not be possible to quantify the potential contribution. Rural exception site should be used to ensure additional homes are delivered to meet the unmet affordable housing needs.

2.7 Similar with Neighbourhood Plans, it is recognised that this could identify additional housing, however unless this is evidenced, and considered to meet the basic conditions, it cannot be quantified at this stage. A recent example is the Chigwell Neighbourhood Plan (CNP) 2018-2033, whilst it identified an additional site for residential development, it failed to meet local and national policies as stated in the Examiner's Report dated 5 November 2018, and it did not meet the basic conditions.

2.8 In addition, any sites within settlements are already accounted for as windfalls. Any sites outside settlements would be Green Belt and therefore unless the local plan has enabled that Neighbourhood Plan to remove land from the Green Belt, no such allocations can be made. Therefore it would not be appropriate to include the additional housing within the Plan's supply.

3. Is the expected windfall allowance of 35 dwellings per annum for 11 years (385 in total) justified? Representations suggest that the figure might be either higher or lower.

2.9 No comments.

4. In determining the contribution of allocated sites to the housing land supply, how have site densities been worked out? Is there any general risk that the capacity of sites has been over-estimated?

2.10 There is some concern regarding the estimated site capacities. Paragraph 2.68 of Policy SP 2 in the EFLP recognises that land is a finite resource, and that the District is subject to policy and environmental constraints. It is therefore critical that land for development is used in an efficient and effective manner. Consequently, it is expected that all new development will maximise densities on housing sites.

2.11 The HIS Update (Para 4.13) sets out that the current estimated site capacities in the Local Plan were based on information collected through the Council's site selection process which took account of identified opportunities and constraints, local character and the best use of land. Whilst the site selection process will be discussed in Matter 5, it is clear that the site selection process has not fully taken account of information available and results in a number of inaccuracies, and there is a risk that the capacity for sites have been over-estimated.

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?

1. What is the five-year supply requirement upon adoption of the Plan having particular regard to the following:

(a) With a requirement to provide 11,400 dwellings over the 22 year Plan period 2011-33, the annualised housing requirement would be 518 dwellings. What is the shortfall in delivery since the start of the Plan period (up to 31 March 2018 if appropriate); and how and over what period is it intended to make up for this? Is it justified not to seek to recover the shortfall within the first five-year period after the Plan is adopted?

- 2.12 The Housing Implementation Strategy Update (HIS, 2019) identifies a shortfall of 1770 dwellings since the start of the plan period. This is based on an annual requirement of 518 dwellings.
- 2.13 From our calculations, as set out in Appendix 1, the Plan would only begin to meet its backlog and annual requirement by 2025/26. This is considered the best case scenario, using the Council's housing requirement figure and the housing trajectory in the HIS Update for when sites are expected to be delivered over the plan period. However, it is highly likely it would be later again in the plan period, when taking into account the buffers in relation to 5 year supply, and also the case that the Housing Requirement figure should be increased.
- 2.14 It is recognised that to address this the Council's approach intends to spread out the backlog evenly over the plan period, and the Council also propose a stepped approach for the housing requirement. The HIS Update states this is the only realistic option and that the Council does not consider it to be feasible, appropriate or realistic to further increase short-term supply. This is not agreed and there has been no proper consideration of any other options, or evidence to demonstrate it is not possible to increase short-term supply, and address the backlog earlier in the Plan period.
- 2.15 The Council refer to the latest Planning Practice Guidance in relation to justifying the stepped approach, and that the housing requirement represents a three-fold increase from the previous adopted target. This is not agreed. Whilst it is recognised that the average housing completion has been low, this is not a sufficient reason to justify a lower provision, and for those reasons of previous low delivery, every effort should be made to address the shortfall now. This HIS Update 2019 seeks to justify this by reference to a number of other local plans. As was discussed during the debate on housing numbers, Epping Forest is the 2nd least affordable district in the East of England with a Lower Quartile affordability ratio of 16.08 in 2017. There is a pressing need to deliver more homes to help meet needs and address affordability issues. With regards the local plans quoted by the Council, the affordability ratios are nowhere near as severe as Epping with Arun at 12.86, Cheltenham 8.93, Tewkesbury 8.65, and Gloucester 6.29 (see Appendix 2). The pressing affordability issues in Epping Forest mean that a stepped approach would not be in accordance with the NPPF. It is clear there is other land which could be released from the Green Belt to help meet needs earlier in the plan process and hence avoid the stepped approach.

- 2.16 The rate of delivery in Epping Forest has been directly influenced by the out-of-date local plan which made no provision for housing delivery beyond 2011 and was based on the housing requirements of the Essex Structure Plan (2,400 dwellings in the period 1996-2011). The 2006 Alteration (adopted in 2008) contains no housing allocations again referring back to Structure Plan requirements that had already been satisfied. Delivery over the last 10 years or so has been characterised by windfall schemes, which will inevitably be low in a local authority that is dominated by significant areas of Green Belt. In these circumstances, past delivery rates have been artificially suppressed and do not reflect demand.
- 2.17 The NPPF paragraph 17 Core Principles includes that *'every effort should be made objectively to identify and then meet the housing...needs of an area, and respond positively to wider opportunities for growth'*. Paragraph 47 also states that to boost significantly the supply of housing the Council should use their evidence base to ensure that their Local Plan meets the full objectively assessed needs, and identify sufficient sites to provide five years' worth of housing against their housing requirements with an additional buffer. PPG is clear that local authorities should deal with any undersupply within the first 5 years of the plan period where possible. The Council has not gone far enough to meet the NPPF and PPG requirements. Every effort should be made to allocate additional sites in the early part of the Plan to address the backlog and housing requirement for the Plan period.
- 2.18 The 2019 HIS Update (Paragraph 4.5) sets out three possible actions and what measures have been undertaken to boost housing supply in the short term. This included identifying new deliverable sites and introduce new policies to increase short term supply. The Council state it does not consider it to be possible or appropriate to bridge the gap by allocating a large number of additional smaller allocations. However, there is no evidence to suggest this is the case, or if the Council have looked to reconsider the site selection process, or adopt a finer grain approach. It is considered the Council have been too narrow in their approach in the Site Selection Process and the Green Belt Assessment, and additional sites could come forward in the short term, in sustainable locations if a finer grain assessment of Green Belt had taken place.
- 2.19 The Council state that in the event sufficient new sites could be identified, then a substantial amount of further technical work would be required, and this would result in significant delays. However, this is not a new issue, and the Council have been aware of the backlog and five year supply issues for some time.
- 2.20 A similar issue has recently been considered as part of the examination for Guildford Local Plan. The Inspector identified that the stepped trajectory is not acceptable, and it would negate the purpose of 20% buffer, and frustrate attempts to address key factors affecting worsening affordability, and would be contrary to Government policy to boost the supply of housing. The Inspector states that the Council should identify additional sources of housing delivery in the early years of the Plan.

(b) What buffer should be included in the five-year supply requirement (moved forward from later in the Plan period) to ensure choice and competition in the market for land? Is the relevant buffer justified? The Housing Trajectory in Appendix 5 indicates that 5% has been added to the annualised requirement for every remaining year of the Plan period. Why is this?

- 2.21 Despite acknowledging that there has been a significant undersupply since 2011, the Council apply only a 5% buffer. The Housing Implementation Strategy Update 2019 does not provide any update on why the 5% buffer is considered appropriate, however reference is included in the earlier version, the Housing Implementation Strategy 2017 (EB410). This states that the 5% buffer is considered justified due to the historic delivery against the East of England Plan which included a significantly lower housing requirement. This does not accord with paragraph 47 of the NPPF.
- 2.22 There has been a persistent under delivery since 2011 (see appendix 1), resulting in a significant minimum undersupply of 1,770 dwellings or just 51% of the requirement having been met. This undersupply figure is likely to be higher given the concerns with the Housing Requirement figure. The 20% buffer must therefore be applied. To make matters worse, even by 2024 there still remains significant under delivery.
- 2.23 This has also been confirmed by the recent Housing Delivery Test Results 2018. This identifies significant under delivery of housing over the last three years, and that a buffer of 20% in accordance with the NPPF 2019 should be applied to improve the prospect of achieving the planned supply.

2. On the basis of the answer to Question 1, will there be a five-year housing land supply upon adoption of the Plan? What evidence is there to support this? Can the Council produce a spreadsheet to show how individual sites are expected to contribute to delivery in each year? In particular:

a. If the Plan is not adopted until mid-late 2019, is it realistic to expect allocated sites to start delivering in 2018/19 and 2019/20?

b. Is it realistic to rely upon sites requiring the adoption of a Strategic Masterplan, including the Garden Town Sites, for the five year supply?

- 2.24 As set out above, it is not considered there will be a five year housing supply upon adoption of the Plan. This is confirmed in the Council's HIS Update 2019, paragraph 3.24, which outlines a 'policy on' 5 year housing land supply calculation of 4.2 years. It is likely this figure would be lower again given the fact that a 20% buffer should be applied, as demonstrated in table 1 below, and also that the backlog should be addressed within 5 years, as demonstrated in table 2 below. This would be further compounded should the OAN increase, given the housing requirement concerns identified.

2.25 It is recognised that given the shortfall in five year housing land supply, it is for this reason the Council have applied a stepped approach to the housing requirement, in addition to the Liverpool approach and the 5% buffer. Whilst this assists the Council in demonstrating a 5 year land supply, for the reasons set out above, this approach is not considered justified or reasonable. Every effort should be made by the Council to deliver sufficient sites to meet the housing need, and it is clear that additional sites are required in the short term.

Table 1 Council's Housing Requirement of 518 per year plus Liverpool Approach and 20% Buffer

Year	Housing Requirement (+20%)	Cumulative requirement	Estimated delivery*	Cumulative delivery	Shortfall / Surplus	New Cumulative Shortfall
2018/19	763	763	480	480	-283	-283
2019/20	763	1,526	371	851	-392	-675
2020/21	763	2,289	244	1,095	-519	-1,194
2021/22	763	3,052	479	1,574	-284	-1,478
2022/23	763	3,815	1,204	2,778	+441	-1,037
5 year supply Calculation	(2,778 (total supply) / 3,815 (five year housing requirement)) x 5 years					3.6 years

Table 2 Council's Housing Requirement of 518 per year, plus Sedgfield Approach and 20% Buffer

Year	Housing Requirement	Cumulative requirement	Estimated delivery*	Cumulative delivery	Shortfall / Surplus	New Cumulative Shortfall
2017/18	1,045	1,045	480	480	-565	-565
2018/19	1,045	2,090	371	851	-674	-1,239
2019/20	1,045	3,135	244	1,095	-801	-2,040
2020/21	1,045	4,180	479	1,574	-566	-2,606
2021/22	1,045	5,225	1,204	2,778	+159	-2,447
5 year supply Calculation	(2,778 (total supply) / 5,225 (five year housing requirement)) x 5 years					2.7 years

*Source HIS Update 2019

2.26 The HIS Update 2019 provides a spreadsheet on how individual sites will contribute to delivery in each year. However, it is not considered realistic to rely on the larger strategic sites, and Appendix 3 sets out information on the delivery of strategic sites in the East of England. This demonstrates how long it takes to deliver such sites. It is not sound to assume completion on strategic sites in the timescales identified in the HIS, and therefore provides further doubt over the ability of the Plan to demonstrate a 5 year housing land supply.

Issue 3: Does the Plan meet the requirements of paragraph 10 of the Planning Policy for Traveller Sites (PPTS) in respect of delivery?

2.27 No comments.

APPENDIX ONE – HOUSING SUPPLY TABLE

Table: Housing Completions and Future Supply

Year	No. of completions	Housing Requirement (11,400 / 22)	Difference from requirement	Cumulative Difference	Percentage of Target
2011/12	288	518	-230		56%
2012/13	89	518	-429		17%
2013/14	299	518	-219		58%
2014/15	230	518	-288		44%
2015/16	267	518	-251		52%
2016/17	157	518	-361		30%
2017/18	526	518	+8		102%
2011/12 to 2017/18	1,856	3,626	-1,770	-1770	51%
2018/19	Expected 480	518	-38		93%
2019/20	Expected 371	518	-147		72%
2020/21	Expected 244	518	-274		47%
2021/22	Expected 479	518	-39		92%
2022/23	Expected 1204	518	+686		232%
2018/19 to 2022/23	Expected 2778	2590	188	-1394	107%
2023/24	Expected 1202	518	+684	-710	232%
2024/25	Expected 1091	518	+573	-137	211%
2025/26	Expected 975	518	+457	+320	188%

Source: HIS Update 2019 Housing Trajectory, Local Plan Policy SP2

APPENDIX TWO – AFFORDABILITY RATIOS

[Contents](#)**Table 6c**

Ratio of lower quartile house price to lower quartile gross annual (where available) workplace-based earnings by local authority district, England and Wales, 1997 to 2017

Region code	Region name	Code	Name	1997	2017
E12000006	East	E07000072	Epping Forest	<i>5.26</i>	16.08
E12000008	South East	E07000224	Arun	<i>4.50</i>	12.86
E12000009	South West	E07000078	Cheltenham	<i>3.96</i>	8.93
E12000009	South West	E07000081	Gloucester	<i>3.28</i>	6.54
E12000009	South West	E07000083	Tewkesbury	<i>3.93</i>	8.65

Source: Office for National Statistics

Notes:

1. House price data are taken from ONS House Price Statistics for Small Areas for the year ending September.
2. Earnings data are taken from the Annual Survey of Hours and Earnings. These figures are estimates of gross workplace-based individual full-time annual earnings w
3. Data for annual earnings are not available before 1999 and for some areas since 1999. For these areas the ratio of house prices to earnings has been calculated usi
Annualised weekly earnings are not produced on an identical basis to annual earnings and are therefore not directly comparable.

APPENDIX THREE – DELIVERY OF STRATEGIC SITES IN THE EAST OF ENGLAND

Site	Local Planning Authority	Lead Developer	Date of Adopted Local Plan	Homes	Submission of application	Committee resolution	Decision notice issued	start on site	occupation of first homes	Application submission to first occupations
Darwin Green	Cambridge City	David Wilson Homes	2006	1593	Dec-07	Jul-10	Dec-13	Aug-17	Dec-18	11 years
North West Cambridge	Cambridge City & South Cambs	Cambridge University	2009	3000	Sep-11	Aug-12	Feb-13	late 13	Jul-17	5 yrs 10 months
Clay Fram, Cambridge	Cambridge	Countryside	2006	2300	Jul-07	May-08	Aug-10	Oct-11	Mar-13	5.75 years
Trumpington Meadows	Cambridge City & South Cambs	Grosvenor/ Barratt	2006/7	1200	Dec-07	Jun-08	Oct-09	Nov-11	Dec-12	5 years
Northstowe	South Cambs	Gallagher	2007	1500	Dec-07	Oct-12	Apr-14	Apr-15	May-17	9.5 years
South east Bury St Edmunds	St Edmundsbury	Pigeon	2010	1200	Dec-15	Jan-17	tbc	tbc	tbc	tbc
North East Haverhill	St Edmundsbury	Hallam	2010	2500	Sep-15	Jul-17	Aug-18	tbc	tbc	tbc
North West Haverhill	St Edmundsbury	NWH Consortium	2006	1150	Sep-09	Feb-10	Mar-15	tbc	tbc	tbc