

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

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

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

**FEBRUARY 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 6: Housing Supply, including Sources of Supply; the Housing Trajectory; and the Five Year Supply. and provides the Council's response to all of the Inspector's questions associated with Issues 1 to 3 (ED5, pp 13-14).

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:

- [EB410A Housing Implementation Strategy Update 2019;](#)
- [EB805 Site Selection Report 2018; and](#)
- [EB803 Settlement Capacity Study 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: Will the Plan provide a land supply sufficient to deliver the housing requirement of at least 11,400 dwellings over the Plan period?***

**Inspector's Question 1**

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?

***Response to Question 1***

1. Monitoring data on housing completions and extant planning permissions is now available up to 31 March 2018 and the Council proposes an amendment to Table 2.3 on page 29 of the LPSV to reflect the updated monitoring data.
2. In addition, further amendments are proposed to the Table to indicate how much housing is expected to be provided through allocations outside the Garden Communities, based on latest data set out in the Housing Implementation Strategy Update (EB410A).
3. These updated figures make it clear that a minimum of 13,103 new homes will be delivered across the District over the Plan period. This is circa 15% over the identified housing requirement and will give sufficient flexibility for the requirement to be achieved.
4. The Council proposes the following amendment to the LPSV:

**Table 2.3 page 29**

|  |         |
|--|---------|
| <b>The components of housing land supply over the period 2011-2033 are as follows:</b> |         |
| Minimum number of homes required to be built 2011-2033: 518 x 22 years                 | ~11,400 |

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|   |  |
|---|--|
| Homes Built (Completions) 2011-2017 up to 31 March 2018                               | 4,330 <u>1,856</u>   |
| <b>What is available in the future (supply)</b>                                       |  |
| Sites with planning permission up to 31 March 2018 + 10% non-delivery rate            | 1,621 <u>1,347</u>   |
| Windfalls 35 x <u>10</u> years  | 385 <u>350</u>   |
| Requirement met through Garden Town Communities around Harlow within EFDC             | 3,900  |
| <u>Requirement met through allocations outside the Garden Communities within EFDC</u> | <u>5,651</u>   |
| <b><u>Total supply</u></b>  | <b><u>3,336 13,103</u><br/><u>(1,703 above</u><br/><u>the 11,400</u><br/><u>Local Plan</u><br/><u>requirement)</u></b> |
| <del>Remaining requirement to be provided elsewhere in the District</del>             | 4,146  |

**Inspector's Question 2**

- 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?**

***Response to Question 2***

5. At this stage it is not possible to quantify the quantum of any additional housing that could be delivered through Neighbourhood Plans and/or on rural exception sites. There are 10 emerging Neighbourhood Plans in the District and whilst it is likely that these will include at least some housing provision above and beyond that of the Local Plan it is not possible to say with any degree of certainty how many such houses would be delivered at this stage. Similarly, while the Council expects some housing provision will be delivered through rural exception sites, it is not possible to quantify the amount of new homes that could be delivered given the sporadic nature of this kind of development.

**Inspector's Question 3**

- 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.**

***Response to Question 3***

6. The expected windfall allowance of 35 is justified. The Council's monitoring data demonstrates that all of the housing allocations in the current adopted Local Plan had been realised by 2006. Therefore, all new homes completed since 2006 (an average of 242 new dwellings per annum) could be viewed as windfall development. The Council does not expect the rate of windfall delivery to continue at this rate following the adoption of the LPSV. It is considered that a windfall allowance of 35 new homes per annum is reasonable and realistic and represents a relatively conservative estimate taking into account the amount of housing delivered on windfall sites since 2006. No windfall allowance is made in the first five years of the Plan period to avoid potential double counting against existing commitments.

**Inspector's Question 4**

- 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?**

***Response to Question 4***

7. Appendix 6 to the LPSV includes an indicative net density for each proposed residential site allocation. These indicative net densities for each site were arrived at through the capacity assessment undertaken as part of the site selection process. The methodology for undertaking this site capacity assessment is summarised in Appendix B1.5.3 Detailed Methodology for More Detailed Assessment for Housing Sites (EB805J), with the results arising from the application of the methodology documented in the relevant site proformas at Appendix B1.6.4 Results of Stage 3/6.3 Capacity and Stage 4/6.4 Deliverability Assessments (EB805N).
8. The Council does not consider there to be a general risk that the capacity of sites has been over-estimated. Paragraph 2.107 of the Site Selection Report (EB805) confirms that the application of the indicative net capacity assessment resulted in an overall reduction in the number of homes which could be delivered through the sites assessed. Furthermore, the density assumptions used as part of the capacity assessment are consistent with national planning policy and Policy SP 3 of the LPSV both of which seek to ensure the best and most efficient use of land. Applying density ranges to sites within the district was also demonstrated to be appropriate through the Settlement Capacity Study (EB803), in particular the opportunity site visualisations included in Appendix 8 to the study (EB803H).

***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?***

**Inspector's Question 1**

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?
  - 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?

***Response to Question 1***

9. Based on the annualised housing requirement of 518 dwellings, the shortfall in housing delivery since the start of the Plan period up to 31 March 2018 is 1,770 dwellings. The Council applied a 5% buffer in the LPSV five-year supply requirement. The approach is justified and is set out in paragraphs 2.14 and 2.15 on pages 7 and 8 of the Housing Implementation Strategy (EB409).
10. Since the LPSV was published, the Council has undertaken further work to take into account the latest data and delivery assumptions which has resulted in the Housing Implementation Strategy (HIS) Update (EB410A and EB410B). This has been developed through consultation with stakeholders and the development industry. The HIS Update indicates that it is not practical or appropriate to meet shortfall through either the 'Sedgefield' or 'Liverpool' approach (see paragraph 3.25 on page 10 of EB410A), and therefore a stepped approach needs to be applied.
11. The justifications for the proposed stepped requirement are set out under section 4 and section 5 of the HIS Update (EB410A). The Council considers that a stepped requirement to housing delivery is the most appropriate and only realistic

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option to meet development needs over the Plan period and ensuring that development remains plan-led. In summary, the Council proposes that the annual housing requirement throughout the plan period should be split into three steps as follows:

**Step 1: Previous years (2011/12 – 2017/18):** the housing requirement for this period has been set at a level that reflects the actual delivery rate during the same period i.e. 265 per annum. This will help to ensure that Local Plan housing delivery target over the remaining plan period is realistic and meets the residual requirement in full.

**Step 2: Years 1 to 5 (2018/19 – 2022/23):** the housing requirement for the five-year period starting 2018/19 is set at 425 new homes per annum (2,125 new homes for five years). Taking into account all the considerations stated above, the Council considers this to be a realistic and achievable target and will be able to demonstrate 6.2 years of housing land supply upon adoption of the Plan in 2019 based on this target, taking in to account the requirement set out under paragraph 47 of the NPPF 2012 for a 5% buffer to ensure choice and competition. If a 20% buffer is applied, the total five-year housing requirement for the five year period will increase to 510 new homes per annum (2,550 new homes for five years) and the Council would still be able to demonstrate 5.4 years of land supply.

**Step 3: Years 6 to 15 (2023/24 – 2032/33):** to meet the overall Local Plan housing requirement of 11,400 new homes, the Council will need to deliver 742 new homes per annum during the last 10 years of the Plan period. Most of the strategic allocations are expected to commence delivery from 2023 onwards, making this target achievable, albeit challenging.

12. With this approach in mind there will be no delivery shortfall from the early years of the Plan period against the stated requirement for step 1 (265 dwellings per annum). Any shortfall identified in the future will be taken into account based on requirements set out under paragraph 47 of the NPPF.



**Inspector's Question 2**

- 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. Is 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?**

***Response to Question 2***

13. On the basis of the Council's proposed stepped housing requirement and latest projected delivery rate for individual sites (document reference EB410B) there will be a five-year housing land supply upon adoption of the Plan.
14. In accordance with the latest estimate, as set out in Appendix 6 of the Housing Implementation Strategy Update (EB410B), Local Plan allocations which have not yet received planning permission are expected to start delivering from 2021/22 onward.
15. The Council considers it realistic to expect a small amount of delivery on sites requiring the endorsement of a Strategic Masterplan, including the Garden Town Sites, for the purpose of five-year housing supply. This approach is considered to be robust and pragmatic. Paragraph 3.14 to 3.20 of the Housing Implementation Strategy Update (EB410A) explains how the Council has considered lead-in times and build out rates for strategic allocations, and concluded that a small amount of new homes could be delivered within Masterplan Areas and contribute towards the five-year supply, so long as they do not prejudice future development or infrastructure provision across the whole Masterplan area. The Council has sought to agree assumptions of delivery rates with individual site promoters and the latest projected delivery rates have received support from a number of key site promoters (see Appendix 4 of EB410A).

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

**Inspector's Question 1**

- 1. Is the plan consistent with paragraph 10-part a) of the PPTS? What is the five-year requirement for the delivery of Traveller sites and will this be achieved upon adoption?**

***Response to Question 1***

16. Yes, the plan is consistent with paragraph 10-part a) of the PPTS and provides for a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against the locally set target.
17. The five-year requirement for the delivery of Traveller sites over the period 2017/18 – 2021/22 is 33 pitches as shown in Appendix 5 of the LPSV. This table also shows that the supply for the corresponding period will be 34 pitches. Therefore, the five-year requirement will be achieved upon adoption of the Plan. The Housing Implementation Strategy (EB410) provides further explanation of the future requirement and supply [p15 and Appendix 5].

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

| <b>Reference</b> | <b>Name</b>  | <b>Author</b>                  | <b>Date</b> |
|------------------|--|--------------------------------|-------------|
| EB410            | <a href="#">Housing Implementation Strategy</a>                                      | Epping Forest District Council | 2017        |
| EB410A           | <a href="#">Housing Implementation Strategy Update 2019</a>                          | Epping Forest District Council | 2019        |
| EB410B           | <a href="#">Housing Implementation Strategy Update 2019 – Appendix 5 and 6</a>       | Epping Forest District Council | 2019        |
| EB805J           | <a href="#">Appendix B1.5.3 – Detailed Methodology Capacity Assessment</a>           | Arup                           | March 2018  |
| EB805N           | <a href="#">Appendix B1.6.4 – Results of Capacity and Deliverability Assessments</a> | Arup                           | March 2018  |
| EB805            | <a href="#">Site Selection Report</a>  | Arup                           | March 2018  |
| EB803            | <a href="#">Settlement Capacity Study Epping Forest District Council</a>             | Fregonese Associates           | 2016        |
| EB803H           | <a href="#">Settlement Capacity Study – Appendix 8 Visualisation</a>                 | Fregonese Associates           | 2016        |