

**EPPING FOREST
DISTRICT LOCAL PLAN
EXAMINATION**

MATTER 11: HOUSING

ID: 19LAD0121

HEARING STATEMENT

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MATTER 11 – HOUSING

Introduction

- 1.1 This Matter 11 Statement has been prepared by Carter Jonas LLP on behalf of Pigeon Investment Management Ltd (Pigeon) to respond directly to the Inspector's questions for this Matter. The Statement only responds to the Inspector's Questions which are relevant to Pigeon's interests. Representations were submitted to the Epping Forest District Local Plan 2011-2033 (EFDLP) on behalf of Pigeon (Id. 19LAD0121). Pigeon are promoting land East of Epping for a residential-led mixed use development for around 400 dwellings (or greater)(Site Ref. SR-0153), which is generally consistent with the 2016 draft EFDLP (Regulation 18) which proposed at least 930 homes shared between South (not the Regulation 19 South) and East, but with East having a frontage onto Stewards Green Road included to provide independent access to East Epping and south being land east of the railway line. Pigeon has also promoted a more extensive area of land at East Epping based on Garden Settlement principles, replacing the allocation of 950 homes South of Epping. Alternatively, East Epping could in full or part supplement the South Epping preferred allocation.
- 1.2 East Epping has been promoted as a site that could deliver a mix of uses providing added benefits for Epping, including: a range of housing typologies including a high proportion of bungalows and self-build plots; a high quality mixed use community hub which could include a local convenience store and doctor's surgery and car parking to serve the local facilities and nearby tube station; a C2 Care Village; Primary School site; potential leisure centre with sports pitch provision; and an Eastern link road between Steward's Green Road and Stonards Hill which would assist in reducing traffic having to travel through the Town Centre.
- 1.3 The housing related representation relevant to Matter 11 is Rep Id. 19LAD0121–10.

MATTER 11: Housing

Issue 1: Will Policy H1 be effective in securing an appropriate mix of housing?

1. Is Part A sufficiently specific in relation to the mix of housing required such that a potential developer would know how to react to the policy? Should it reflect up to date evidence on the actual mix required?

- 1.4 Pigeon supports the flexible approach in the policy that the housing mix will be determined by site characteristics and the type of housing currently provided in an area. It is considered that a mix of house types and sizes should only be applied to major developments.

4. Does the policy require all new homes to meet the Optional Technical Standards M4(2) and/or M4(3) of the Building Regulations for accessible & adaptable dwellings and wheelchair user dwellings respectively? If so, is the need for these standards justified by evidence such as that suggested by the PPG? Should the policy allow for consideration of site specific factors which might render such standards unachievable or unviable?

- 1.5 It is considered that the mandatory Part M4(1) standard for new homes will provide sufficient accessibility for most older people, and as such, the requirement for all new homes to comply with the Part M4(2) standards is disproportionate to the likely needs during the plan period

6. Will the policy be effective in providing opportunities for self-build/custom housebuilding? Having regard to the duties set out in the Self-build and Custom Housebuilding Act 2015, should the Plan set out how many such homes it aims to deliver, and should it be stronger in terms of how the necessary land will be secured?

- 1.6 It is considered that the policy will be effective in providing self-build/custom housing, in that landowners and developers will be engaged in identifying suitable sites for such housing.

Issue 2: Will Policy H2 be effective in securing the delivery of sufficient affordable housing of an appropriate type and size? Are the requirements for affordable housing provision from market sites justified by reference to evidence of development viability?

1. Paragraph 3.9 states that 2,851 affordable homes are required over the period 2016-2033. How many is the Plan aiming to provide as a result of Policy H2? If the requirement for 2,851 would not be met, has consideration been given to increasing the total housing requirement to help deliver more? Should the number of affordable homes expected to be delivered over the Plan period be specified in the policy for monitoring purposes?

- 1.7 As highlighted in Paragraph 3.9 of EFDLP, the identified affordable housing need between 2016 and 2033 is 2,851 dwellings, which equates to an average of 178 affordable dwellings per annum. The annual monitoring data demonstrates that there has been inadequate delivery of affordable housing in Epping and it has fallen well short of what is required. – see Table 3 in the Annual Monitoring Report 2017-18 [Doc Ref. EB1708M].
- 1.8 Table 3 in the Annual Monitoring Report 2017-18 shows affordable housing delivery in recent years as follows:
- 2013/14 – 9 dwellings;
 - 2014/15 – 69;
 - 2015/16 – 38;
 - 2016/17 – 0; and,
 - 2017/18 – 89.
- 1.9 The data for the remaining part of the plan period is set out in the Annual Monitoring Reports for 2011/12 (EB1708H, paragraph 4.2.1.7) and for 2012/13 (EB1708I, paragraph 4.2.1.7), these reports confirm that zero and 33 affordable units were delivered in 2012/23 and 2011/12 respectively. Therefore, the Council's monitoring data confirms that a total of 238 affordable dwellings have been provided between 2011/and 2018, compared with a requirement for 1,246 affordable dwellings during this period. This represents just 19% of the quantum of affordable housing that should have been delivered. The current affordable housing shortfall and the past performance of affordable housing delivery indicates that the affordable housing needs of Epping Forest District have not been met up to 2018 and a combination of the significant shortfalls that already exist, and the Council's development strategy mean that the affordable housing needs of the district will not be met during the plan period.
- 1.10 If the current under delivery and shortfall of affordable housing is included then the annual requirement for affordable housing should now be set at 290 dwellings. It is considered that a significant stepped change is therefore needed to increase the supply of affordable housing, from an annual delivery rate of 34 affordable dwellings to the annual average requirement of 290 affordable dwellings. As set out below, additional housing sites that can provide affordable dwellings are needed.
- 1.11 In earlier examination hearing sessions the Council has confirmed that its development strategy is unable to meet the identified objectively assessed needs in the early years of the plan period, and propose a stepped trajectory to deal with this issue. As a result of the strategy the restrained housing delivery is set to continue. In the Council's Matter 6 statement the proposed housing targets are as follows: 265 dwellings for 2011-2018; 425 dwellings for 2018-2023; and, 742 dwellings for 2023-33. It is considered that even if EFDLP is capable of delivering the full affordable housing requirement (which we have significant reservations about, see below) a significant stepped change in the delivery of affordable housing is unlikely to occur until after 2024 at the very earliest, and in the interim period the affordable housing need will continue to increase and the affordable housing backlog will be substantial.
- 1.12 In addition, as set out in Pigeon's Matter 6 Hearing Statement, there will be a housing shortfall when realistic delivery rates are applied to all of the Garden Community Sites around Harlow and a larger proportion of those developments would happen beyond the plan period. The edge of Harlow sites within Epping Forest District are large sites that are expected to make a significant contribution to the overall supply of affordable housing. If, as anticipated, less housing is delivered from the edge of Harlow sites then there would be an associated reduction in the delivery of affordable housing in Epping Forest District during the plan period, which further increases the expected under-delivery of affordable housing.
- 1.13 It is noted that of the 10,000 dwellings predicted to come forward in Epping Forest District between 2019 and 2033, approximately 5000 dwellings are to be delivered from the three Garden Community Sites and Epping

South. As set out in Pigeon's Hearing Statements for Matters 6 and 8, it is considered that the quantum of development proposed to come forward on the edge of Harlow indicates that the predicted housing delivery rates are unrealistic. If overall housing delivery is delayed at the Garden Community Sites then the delivery of affordable housing will be reduced further. It is often the case that large strategic sites, which need to provide significant levels of physical and community infrastructure, are unable to deliver policy compliant levels of affordable housing. As will be set out in Pigeon's Hearing Statement for Matter 15, the delivery of a bridge over the railway line for the Epping South site may have implications for the viability of that development and the delivery of affordable housing. If this is the case for the three Garden Community Sites and Epping South, how will any under delivery of affordable housing in the early phases be addressed. It is unlikely that affordable housing would be increased to above policy compliant levels in later phases, and it would be undesirable to have later phases dominated by a single form of housing tenure. If the alternative of collecting commuted sums to offset the provision of affordable housing on site is selected it is not clear how and where that money would be spent in an authority constrained by the Green Belt.

- 1.14 Therefore, the decision to focus development at three Garden Community Sites and at Epping South demonstrates that EFDLP is not sufficiently flexible, and would not deliver the quantum of affordable housing to meet identified needs. As a result, amendments are required to EFDLP.
- 1.15 As set out in Pigeon's Matter 3 Hearing Statement, the inadequate delivery of affordable housing supports a higher market signals uplift to the objectively assessed housing need which results in a higher housing target; Pigeon requested that the housing target should be increased to a minimum of 13,278 dwellings to reflect a 20% uplift for market signals.
- 1.16 Therefore, the option to increase the housing requirement to deliver more affordable housing has not been considered. The current shortfall in the delivery of affordable housing, the under-delivery of affordable housing from the edge of Harlow sites during the plan period, the significant need for affordable housing, and the high affordability ratio in Epping Forest District, the potential under delivery of affordable housing at Epping South indicates that there is a case for a higher housing requirement to deliver more affordable housing.
- 1.17 The land East of Epping promoted by Pigeon would deliver affordable housing early in the plan period if allocated for development in EFDLP.
- 1.18 If it is decided that additional sites do not need to be allocated in EFDLP then it is considered that a robust mechanism of monitoring should be put in place, and safeguarded land should be identified so that housing land can be brought forward if monitoring demonstrates that it is needed to meet a housing land supply shortfall.

