

TO: The Inspector for Epping Forest District Council (EFDC) Local Plan
Mrs Louise Phillips MA (Cantab) MSc MRTPI

Ref:- ONS 2018-Based Household Projections, EFDC Examination Documents ED114 and 114A

Dear Mrs Phillips,

On behalf of CPRE Essex I welcome your invitation to make comment. We wish to refute the conclusions made by EFDC and Opinion Research Services (ORS) and would make the following comments for your consideration.

The lower growth predictions for EFDC (ONS 2018), should provide EFDC with the opportunity to reconsider the proposed GB boundary alterations around a number of settlements, as outlined in the draft Local Plan.

It would appear that the methodology used, *taking all factors into account*, on the 2014-based figures for household growth (14,374) produced an OAN of 12,573 homes. The dramatic reduction (by 54%) in the 2018-based household growth of 6,616, gives rise to, on the same basis, an OAN of only 5,787 homes. ORS in the report produced for EFDC now indicates 11,920. Lower growth predictions for EFDC (ONS 2018), thereby enables withdrawal of the proposed GB boundary alterations, which would result in permanent harm to the surroundings of those settlements where significant increases of built development are being proposed - such as, Waltham Abbey, North Weald and Ongar.

It is understandable that EFDC wish to see the speedy adoption of the Local Plan as delays will require yet more additional work, costing time and money - particularly in respect of employing external consultants to review the site selection to reduce the figure from 11,400, which is their preferred target.

CPRE Essex feels strongly that the number of dwelling units should be constructed in the right place, respecting important environmental designations and to meet the needs of local people.

The SAC of Epping Forest is a much valued and essential part of the district and CPRE Essex is concerned that the excessive number of homes built on surrounding Green Belt land, will have a detrimental impact on the environmental integrity of the Epping Forest SAC and SSSI. This will also be at odds with EFDC's declared (19 Sept. 2019) Climate Emergency. Green Belt land in its present state serves beneficial purposes in the sequestration of carbon dioxide and in flood prevention.

It was unfortunate that there was a delay by EFDC in placing documents ED114 and ED114A onto its Local Plan website. Once in the public domain it did allow interested parties to access the detailed information within it but reduced the time available for any interested parties to give it their full consideration.

In assessing the accuracy of the methodology used by the consultants to come up with their figures, the following documents have provided useful data about migration levels.

- (a) Quality and Methodology-Information, by Andrew Nash, 29 June 2020
- (b) Impact of different migration trend lengths, by Andrew Nash, 24 March 2020
- (c) Variant Household Projections for England, 2016-based, by Saffron Weeks, 16 May 2019

As a result, I would like to draw your attention to the methodology used and conclusions in the report as it applies to Epping Forest District. The District, which is 90+% Green Belt, lies just outside of Greater London. As it is a pleasant area in which to live, it attracts migration from adjacent London Boroughs including Redbridge and Waltham Forest. These, in turn, are subject to inward migration from within London and the ONS Reports make it clear that EU Accession has been a major driver of migration into London. It would appear that any migration changes as a result of Brexit have not been considered. Thus projecting, into the future, events of the previous decade is inherently misleading. The impacts on population demographics as well as work patterns due to the current Covid 19 pandemic are likely to have a medium term impact on economic activity and employment rates. Neither of these are mentioned in the ORS Report which was prepared during the time when the impact of these two issues was being hotly debated.

A careful examination of the ORS Fig 5 for Epping Forest District, clearly shows what has been going on and the dramatic downwards and ongoing trend taking place - from +1500 at its peak in 2013/14 to only + 550 for 2017/18. That ORS uses a 10 year variant method to average out peaks and troughs, masking the downward trend against the fact that a “Systemic Change” (Ref2) is happening because of Brexit, and Covid 19. The ONS Report (Ref2) covers the disadvantages of the 10 year method, “dampening the effect of more systemic changes that occurred over the 10 years” and the “multiple methodological changes to prepare internal migration estimates have had three different methods over that time which will necessarily impact on the quality of the figures”!

Michael Hand

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