

Epping Forest Local Plan Examination

Response to message from Inspector dated 14 October 2020 regarding Objectively Assessed Housing

Dr. John Manning,

The response by EFDC in the form of ED114A is particularly broad brush and has no reference to the local regions within EFDC; many of the statistics treating the area of West Essex as the study area. As I identified in my submission to the Inquiry on Thursday 23 May 2019, Afternoon Session Matter 14 – Infrastructure and Delivery there is a document entitled “Settlement Hierarchy Technical Paper”, dated September 2015 which provides an analysis of the 2011 census within the EFDC area on a local basis. Appendix 3 of this document covers settlement profiles in towns, large villages, small villages and hamlets. At the Inquiry, I pointed out that this, surprisingly, is not a referenced document although it is referred to in ED45 and HW6. The 2011 census shows a relatively low household size of, generally, between 2 and 2.5 people per dwelling, which is typical for the Epping area. The number of new residents proposed in the LPSV proposals for housing is still unclear as is the impact which this will have on infrastructure requirements, viz. transportation, schools, doctor provision, recreation, green spaces.

The ORS Report shows little change in the predicted population in the study area between 2011 and 2018 and but no clear forecasts for change in the Epping Forest area are made and the reason for the reduction from a peak of 1500 population change in 2013-14 to 500 in 2017-18 (Figure 5) is not given.. The Report has no information on the location of the predicted number of aligning jobs and workers within the West Essex and East Hertfordshire area. It is well known that there is much migration of workers within this area. Examples of this are readily seen in Epping where a large proportion of the retail workforce travels in to the town and the demand for transport from the Epping Central Line Tube for connections to Harlow and wider locations.

Paragraphs 45 and 46 have clear statements viz. “the 10 year migration variant of the 2018-based projections would provide sufficient workers to align with the jobs growth”: and “On this basis there would not be any need to increase the housing number to accommodate any additional workers within the area”. With the current difficulties with the Coronavirus pandemic this observation has particular relevance. One can therefore question why the LPSV has such a high housing projection when there is no predicted employment requirement.

The household formation information cannot be directly compared with the 2011 census. However, there is a noticeable difference between the EFDC and the Harlow graphs and in Figure 18 for Household Representative Rates in the ranges 16-19, 20-24 and 25-29. This reflects the predominance of a younger population in the Harlow area and of older householders in EFDC area. This is possibly driven by house prices which is also a reason for migratory nature of the Harlow workforce as there is a larger pool of affordable housing in that locality.

The Report gives no information on the total available housing stock in the study area and how this is currently utilised. A small change in the household makeup would obviate the need for such a large number of new dwellings. The conversion of some of the large houses often occupied by two

people and the utilisation of infill areas , particularly in EFDC area , to make a provision for smaller units would have significant benefits and obviate the need for major urban development.

The OAN needs contained in Figure 21 take no account of the availability or need for infrastructure. It is inconsistent and illogical to propose 9,204 new housing units in EFDC area and 4,593 in Harlow. The urban makeup of these authorities is totally different; EFDC is made up of two small towns , (Epping and Ongar), and many outlying villages and rural areas , whereas Harlow is an established centre in need of major uplifting with well-publicized development and infrastructure plan, a new motorway link and a proposed new hospital.

The logic behind the plan in Figure 22 is difficult to comprehend. The requirement for housing outside the study area is meaningless without consideration of the migrant works who enter the area to undertake specific tasks on a short stay basis, and the influence of the proximity of London as a source of work, factors have a significant impact on infrastructure requirements.

It is inappropriate to plan for the housing demand as FOAN within the West Essex area on predictions which are pro rata to existing population, (see para 77), without regard to restraints which are imposed by demographic, geographic, environmental and historic considerations .

J . Manning