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Our Ref: RJC/EFDC LP  
Date: 6 November 2020  
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Dear Ms St John Howe

## **EPHING FOREST DISTRICT LOCAL PLAN – CONSULTATION ON 2018 BASED HOUSEHOLD PROJECTIONS**

Thank you for your message of 14 October 2020 consulting Essex County Council (ECC) on the above matter, including the report prepared by ORS, together with EFDC's conclusions on this in response to the Inspector's question on whether the new household projections represent a meaningful change in the housing situation for the emerging Epping Forest District Local Plan (Submission Version 2017) (LPSV).

ECC provides the following response, which reflects ECC's various functional and service delivery roles and as a participant in the LPSV preparation process. The response is made up of two main elements:

- Comments directly on the ORS technical report 'West Essex and East Hertfordshire Housing Market Assessment [Updating Overall Housing Need using the 2018-based projections](#) (September 2020)'
- Related summary information and wider comments relating to the planned HMA growth strategy and its focus - to be provided through Harlow & Gilston Garden Town (HGGT). This is considered relevant, since the EFDC LPSV growth strategy makes an important contribution of almost 4,000 new homes towards the planned Garden Town growth

### **ORS report on homes needs and growth for the EFDC LPSV**

The key points to make initially are that ECC considers this work and its findings / conclusions robust and reliable and compliant with the NPPF / PPG applicable at the time. Therefore, ECC also considers that for the purposes of the Inspector's key question, the 2018 based household projections do not represent a *meaningful change in the housing situation* that would require the LPSV to take a different approach towards its planned level of housing provision. The PPG makes clear:

- 'Establishing future need for housing is not an exact science';



- 'that these household projections provide the starting point estimate of overall housing need'. This then makes it clear that arriving at the overall outcome in respect of this important consideration needs to be a broader process inclusive of a wider range of factors;

And finally that:

- 'A meaningful change in the housing situation should be considered in this context, but this does not automatically mean that housing assessments are rendered outdated every time new projections are issued'. As ECC has outlined above, it is considered that the September 2020 ORS report demonstrates the latter point.

ECC also draws attention to some broader considerations outlined below.

### **The West Essex and East Hertfordshire HMA Growth Strategy and HGGT Vision**

ECC has been an active partner in the evidence base and planning work carried out under the Duty to Co-operate. This work (and earlier preceding work, including that for the 2008 RSS) concluded and showed that Harlow was the most appropriate and sustainable location at which to focus planned growth within the HMA. As such, ECC has retained a considerable interest over time in supporting this planned growth and its successful delivery. As the Garden Town documents identify ([HGGT Vision document](#)), this scale of transformational growth presents a once in a lifetime opportunity to transform the fortunes of this New Town and to secure its future.

ECC also wishes to emphasise a number of key factors that are considered fundamental to delivering the existing planned scale of growth at Harlow, including that to be located within Epping Forest district.

The overall planned infrastructure package necessary for Harlow to ensure the growth is sustainable is dependent on achieving sufficient critical mass to enable its delivery. This includes, for example, new infrastructure measures and investments on a considerable scale, such as M11 J7A, improvements to J7 and the sustainable transport corridors network, as well as the new Princess Alexandra Hospital (to be located within Epping Forest district) and new Public Health England (successor) HQ. It is vital to recognise and enable the integrity of the overall package of identified transport infrastructure measures, as set out in the MOU on Highways and Transportation Infrastructure for the West Essex / East Hertfordshire HMA (February 2017) – [EFDC LP examination document ref. EB1201](#). The emerging HGGT Transport Strategy and its ambitions to achieve a 60% sustainable travel mode share for travel associated with the new strategic developments (and 50% across the wider town) require a high quality network of walking / cycling and passenger routes to enable sustainable travel mode shift.

The need to secure sufficient developer funding for much of this infrastructure package is critical. This is tied to the planned scale of growth, as the HGGT IDP and viability assessment show.

The HGGT documents and wider evidence base also set out the imperative for successful regeneration of Harlow.



Other key elements of Harlow regeneration include increasing, widening and improving the town's currently limited housing offer. The currently planned scale of homes growth reflects the Government's key objective of boosting significantly the supply of homes (NPPF paragraph 59). The LPSV as proposed offers an important contribution towards delivering successfully on this aim, by providing the confidence and certainty on which landowners, developers and site promoters rely. More affordable homes remain vital for EFDC and Harlow, as evidenced by the SHMA (2017). Harlow DC's own IDP & HDLP viability assessment (the Delivery Study for Harlow and the Surrounding Area) provide helpful evidence on the pressing affordable homes need. These can be viewed through the HDLP examination webpages – [document ref.s HEBI1 and HEBI2](#).

Related to this is the need to rebuild Harlow's economy and foster inclusive local economic growth. This is partly to help ensure that the economy becomes resilient. Equally important is that the local population is upskilled, retrained and enabled to obtain well-paid employment in growing, future-proofed sectors and to provide a well skilled workforce for the future, meeting the needs of employers. The latest draft economic evidence work for HGGT indicates the scale of job creation at around 20,000 new jobs (over the Local Plan timeframe), representing a vast contribution to the local and wider economies.

These key growth derived benefits arising through the planned scale of growth at Harlow, are proposed to help position the town as a much more sustainable self-contained place. This will enable greater opportunities to live and work locally and redress in / out commuting patterns. The sustainable travel infrastructure will be able to serve both new and existing populations. The Government's commitment to achieve a carbon neutral position by 2050 will be promoted as a major step forward in efforts to address climate change.

### **Concluding Comments**

Through this submission ECC concludes that it endorses and commends the September 2020 ORS evidence report submitted by EFDC. In addition, it is considered that the wider but related considerations related in this letter are of equal weight and importance in reaching conclusions on this matter. Therefore, ECC concludes that in relation to the Inspector's key question (for the purposes of the PPG) a meaningful change to the housing situation has not arisen as a result of the 2018 based household projections insofar as the LPSV is concerned.

If you wish to discuss any of the above matters in further detail please contact me.

Yours sincerely

Rich Cooke  
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