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6 November 2020

Dear Mrs Phillips

## **Epping Forest District Local Plan 2011-2033 | 2018-Based Household Projections**

We have prepared this letter on behalf of Freetown Homes in relation to the response from Epping Forest District Council ('EFDC') on whether the publication of the 2018-based household projections have any implications for the submitted Plan in respect of the objectively assessed need ('OAN') for housing, the housing requirement or Green Belt release. It should be noted that representations to Local Plan consultations have been submitted previously by Freetown Homes.

Having reviewed examination documents ED111, ED114 and ED114A, it is our understanding that EFDC do not consider that the housing requirement in the Local Plan needs to be adjusted as a result of the 2018-based household projections. The housing requirement set out within the Local Plan is based on the local needs assessment in the West Essex & East Hertfordshire SHMA July 2017 (EB407). This document takes the 2014-based household projections as the starting point for calculating the OAN for housing. This was found to be 12,573 dwellings for the Plan period, or 572 dpa, while the Local Plan sets the housing requirement at 518 dpa.

It is our view that the housing requirement established within the 2017 SHMA should continue to be used within the Local Plan and that the differentiation between the findings of the 2017 SHMA (51,700 dwellings across the market area) versus the 2018-based projections (48,950 dwellings across the market area) does not represent *"a meaningful change in the housing situation"* because this has implications for the future growth strategy of the District.

Furthermore, we consider it important for LPAs to be aspirational when setting housing targets. Seeking to lower the strategic housing requirement and annual housing target at this point would ultimately reduce the pressing need for a significant uplift in housing delivery in the District. This need is particularly acute given several years of below-average delivery and a worsening housing land supply position which has been exacerbated by the moratorium on development in relation to understanding potential impacts on the Epping Forest SAC and unprecedented delays in the housebuilding and construction sectors amidst Covid-19.

Should it be considered necessary to consider additional sites to ensure an adequate immediate and long-term housing land supply position, we maintain that Land East of Hainault Road, Chigwell, IG7 6QX represents a logical urban extension to the settlement of Chigwell. The site can contribute to meeting short and longer-term

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housing (and other land use / infrastructure) needs whilst still aligning with the requirement to facilitate sustainable patterns of development. The site is immediately available; suitable; and deliverable.

For clarity, a site red line plan is provided below. This shows the full extent of the site which could come forward as a residential-led strategic development opportunity or an appropriately-sized urban extension to Chigwell.



We trust the above clarifies our position, and we would like to confirm our interest in participating in future stages of the examination process.

Yours sincerely

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