

18th November 2020

Our ref: LP/KER410 217037 003 12 11 20

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Dear Ms St John Howe

RE: INSPECTOR'S LETTER TO THE COUNCIL ON 14 JULY 2020 (ED111) AND THE COUNCIL'S RESPONSE OF 4TH SEPTEMBER 2020 (ED114 AND ED114A)

Thank you for inviting comments regarding the above. This letter is sent on behalf of Eales White, Kerr, Kerr and McKinney, landowners of draft allocated site ONG.R1. (19LAD0070).

We support the conclusions of West Essex and East Hertfordshire Strategic Housing Market Assessment: Updating Overall Housing Need using the 2018-based projections (ORS September 2020) that the 2018-based household projections do not represent a meaningful change in the housing situation.

In accordance with the 2014 national guidance (pertinent to plans being examined under the 2012 transitional arrangements), the 2018-based sub-national population projections (SNPP) are the starting point for the estimate of housing need. However, these are trend based and require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends. As demonstrated by ORS, it is justified to apply longer-term migration trends and make adjustments to allow for the impact of suppressed household formation on past trends.

We fully support the conclusion that the latest information does not represent "a meaningful change in the housing situation" and agree that the projections do not warrant a change to the housing requirement and the plan's proposed Green Belt releases remain fully justified.

It is, however, notable that whilst that the OAN for Epping Forest of 11,920 set out in ED114A is lower than the OAN of 12,573 dwellings originally assessed for the purposes of the Local Plan, it is still higher than the 11,400 housing requirement set by the Plan.

We would like to reserve our right to comment further on the matter in any future hearings, if necessary.



I would like to further confirm that our clients continue to support the proposed allocation of site ONG.R1. (19LAD0070).

Yours sincerely

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