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property & town planning

21 October 2020

Ms Louise St John Howe
Programme Officer
PO Services
PO Box 10865
Sudbury
Suffolk CO10 3BF

(No Representor reference available)

Dear Ms St John Howe

**RE: EPPING FOREST DISTRICT LOCAL PLAN. INDEPENDENT EXAMINATION IN PUBLIC.
WEST ESSEX AND EAST HERTS STRATEGIC HOUSING MARKET ASSESSMENT.
UPDATING OVERALL HOUSING NEED USING 2018 PROJECTIONS.
EPPING FOREST DISTRICT COUNCIL'S RESPONSE 4 SEPTEMBER 2020.
COMMENTS ON BEHALF OF MR MARK GREGORY.**

I refer to the above documents and the Inspector's request for comments on the Epping Forest Response.

On behalf of Mr Mark Gregory I submit the following observations.

- 1 The changes in methodology and especially in some of the variables in population, births, deaths and migration, and trends in household formation etc are noted.
2. However, there has been a shortfall in net additions to housing stock, despite recent increases. (para. 58). It is therefore agreed that the Full Objectively Assessed Housing Need has not reduced by an equivalent amount to changes in migration.
- 3 When suppressed household formation is taken into account (and high prices remain a concern for Epping Forest District in particular) (see para 68), the requirement of 48,950/2225 dpa for the FOAHN is agreed and supported.
- 4 The distribution of this need to Epping Forest District in Figure 21 for the period 2011-2033 at 12,946/589 dpa is likewise supported.
- 5 The conclusion of the Key Findings in the Summary is supported. The last information does not represent "a meaningful change in the housing situation".

Accordingly the conclusion of the Epping Forest District Council in their Response of the 4th September 2020 with regard to the overall housing requirement in the Local Plan Submission Version does not need to be changed is broadly supported.

However, it is not agreed with the Council that as a result of this finding the Green Belt boundaries and proposed green belt releases are adequate and sufficient to meet the FOAHN for the District over the Plan period.

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It remains the Representor's case that the Council has failed to consider brownfield land opportunities in the Green Belt properly and comprehensively, and that the potential for land within and adjoining smaller settlements in the Green Belt has been overlooked. Furthermore that the contribution that smaller sites can make to delivering the FOAN over the Plan period has been underestimated, especially in the early years of the Plan period.

This Response confirms these matters still require rectification.

Likewise the significant reliance on large site delivery with significant up-front infrastructure provision remains a more risky strategy for annual housing delivery than that which small site contributions can make from small scale green belt releases. These are still needed.

The lack of any meaningful change in the housing situation does not alter the need for the Local Plan amendments sought by the Representors to be made.

I trust the Inspector will give due weight to these comments in the Examination.

Alan Wipperman BA MRICS MRTPI C Dip AF

Copy: John Dagg
Mark Gregory.