



PEER GROUP PLC

Ms Louise St John Howe
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6th November 2020
By email only

Dear Ms St John Howe

**EFDC – Local Plan
Response to Inspector’s Consultation
2018 Population and Household Formation Projections**

I am responding to the Inspector’s invitation to comment on the Updated Overall Housing Need using the 2018 ONS population and household projections, as assessed by Opinion Research Services in September 2020 (Opinion Research) on behalf of EFDC.

The Opinion Research advice concludes that the 2018 ONS population and household projections are not a meaningful change and, consequently, there is no requirement to modify the submitted Local Plan for that reason.

Notwithstanding the above, the Inspector is reminded that under Standard Methodology, the housing need in EFDC would be 923 dwellings per annum (18,460 over a 20 year plan period) which is significantly higher than the Housing Target of 11,400 in the submitted Plan. Standard Methodology is based on the 2014 MHCLG projections which are demonstrably more robust than the 2016 or 2018 ONS projections. This is primarily because the latter ONS projections are based on a much shorter two-year period of historical data, which fails to fully take into account the under-delivery of homes (which feeds directly into a reduction in household formations) over a five or ten year period. This gives a false and depressed picture of previous housing need, which is then erroneously projected into the future.

Peer Group is also deeply concerned that the Council failed to recognise the very serious situation caused by the allocation of housing sites within the inner and outer zones of influence to the Epping Forest SAC. This is likely to require a significant number of allocated housing sites within the submitted Plan to be deleted. That would result in a certain failure to meet even the very low Housing Target in the submitted Plan.

The Council has brought the Epping Forest SAC situation upon its own head by failing to prepare a sound Plan with the most suitable site allocations. This is particularly the case because there are, in fact, alternative sites which are both suitable and sustainable outside the SAC zone of influence which were not allocated by the Council for reasons that were not rational, objective or justified. Quite clearly, as these sites would not cause harm to the Epping Forest SAC, they should now be considered for allocation in preference to sites which are within the SAC zone of influence.

A further material consideration in terms of the Housing Target, housing distribution and site allocations is the requirement for SANG provision, as required by the Inspector in her advice to EFDC dated 2 August 2019.

In North Weald Bassett there is a specific requirement for a SANG. This can be provided on the Ongar Park Estate which comprised 190 hectares (500 acres) to the east of that settlement on land which adjoins the settlement and is, in part, on previously developed land.

The Ongar Park Estate can far exceed the Inspector's expectations for a SANG in every respect, but EFDC refuses to engage with Peer Group to discuss that opportunity. Instead, the Council is seeking to pursue a SANG on land that is wholly unsuitable and inferior for that purpose, adjacent to the airfield and in close proximity to the M11. The Council itself, shown at Appendix 3 paragraph 1.30 of its Green Infrastructure Strategy (2019), identify that the minimum requirements for a SANG are:

"SANG needs to reproduce the quality of the experience that a visit to the Epping Forest would provide, so an air of wildness, even when there are significant numbers of visitors on site is important."

The Council also identifies;

"A SANG must be free from unpleasant intrusions which would detract from its attractiveness as a place to visit."

The Council is therefore (1) failing to apply its own requirements for a SANG and (2) refusing to even consider the reasonable alternatives.

A further copy of the SANG brochure that Peer Group prepared and submitted to the Council earlier this year is attached to this representation. We trust the Inspector will find time to consider the SANG being offered by Peer Group in North Weald Bassett and will guide the Council to explore this opportunity objectively and constructively in her next advice note to the Council.

From the above, I hope the Inspector will appreciate that the latest consideration of the ONS population and household projections is just one element of a larger problem with the EFDC Local Plan. The submitted Plan should not be found sound until the unnecessary adverse impacts on the Epping Forest SAC are resolved and the SANG requirement in North Weald Bassett is delivered in the most suitable way.

With kind regards

Yours sincerely

Howard Dawson
Managing Director