

The Inspector of Epping Forest Local Plan  
c/o Mrs L St John Howe  
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By email only to: [louise@poservices.co.uk](mailto:louise@poservices.co.uk)

5 November 2020

Dear Madam

**Epping Forest Local Plan Examination  
Implications of the 2018-based household projections**

Thank you for the opportunity to provide comments in respect of the above.

M Scott Properties Ltd agrees with the Council's response in respect of the above, as set out in Document ED114, that the 2018-based household projections do not represent a meaningful change in the housing situation. As such, we agree with the Council's conclusions that the housing requirement in the Local Plan Submission Version should remain unchanged.

Whilst the report produced by Opinion Research Services (ED114A) ('ORS report') acknowledges that the 2018-based projections are considerably lower than previous official projections, it also recognises that these are based on relatively short-term migration trends. The report confirms that these do not provide an appropriate basis for establishing the OAN, nor would they generate sufficient workers to align with the planned jobs growth. Concerns as to the short-term migration trends used in the 2018-based projections have also been raised by other authorities who have had to consider the effects of the 2018-based household projections on their housing situations. One example is the North Essex Authorities (NEAs - Tendring, Braintree and Colchester). Evidence produced by Stantec for the NEAs also considers the migration trends used to be responsible in part for the considerable reduction in household growth as a result of the 2018-based household projections.

The ORS report notes that whilst the 2018-based household projections, when based on a 10-year migration trend, are lower than that identified by the 2017 SHMA update, it would be inappropriate to conclude that the OAN figure had also reduced by an equivalent amount given the need to take into

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account past under-delivery of housing and the impact of suppressed household formation. More specifically, the period used for internal migration trends (2016-2018) was a period of under provision. Between 2014 - 2018, an average of 303 additional dwellings were delivered in the District. This compares to the local housing need established through the Standard Method of 953dpa (which takes account of undersupply by the application of an affordability adjustment). This is also revealed in the Housing Delivery Test, which for Epping Forest was 50% of the housing requirement in 2019. The under-delivery of homes prior to and during 2016-18 has a clear potential to suppress internal migration over the period used in the 2018-based SNHP.

The report also refers to the requirement for housing need assessments to reflect the consequences of past under-delivery of housing, as set out in the PPG, given this can affect household formation. While the Housing requirement in the Local Plan Submission Version was not based on the Standard Method, being based on an agreement between the authorities in the Housing Market Area, the PPG is clear that 'Where an alternative approach to the standard method is used, past under delivery should be taken into account.' (Paragraph: 011 Reference ID: 2a-011-20190220)

We agree with the conclusions in the ORS report and the Council's opinion that the 2018-based household projections do not represent a meaningful change in the housing situation. As such, we also agree that the justification remains for the proposed Green Belt releases within the Plan.

Yours sincerely

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