

TO: The Inspector for Epping Forest District Council (EFDC) Local Plan
Mrs Louise Phillips MA (Cantab) MSc MRTPI

FROM: The Chair of Theydon Bois Action Group (TBAG)
Dr John Warren BSc PhD

Ref:- ONS 2018-Based Household Projections, EFDC Examination Documents ED114 and 114A

Dear Mrs Phillips,

Further to your invitation to make comment, we wish to refute the conclusions made by EFDC and Opinion Research Services (ORS) and wish to make the following comments and critique for your consideration.

ED114 and EFDC

The methodology used, *taking all factors into account*, on the 2014-based figures for household growth (14,374) produced an OAN of 12,573 homes. The dramatic reduction (by 54%) in the 2018-based household growth of 6,616, gives rise to, on the same basis, an OAN of only 5,787 homes in stark contrast to the 11,920 now cited by EFDC's consultants, ORS. It is well known locally, that EFDC just want to get the local plan over with - done and dusted - as delays mean more time and work and cost money, particularly on outside consultants. In this respect, it is not in EFDC's interest to have the OAN reduced as it will mean more work on site selections to remove the most "environmentally sensitive sites". This was made clear at a Full Council Meeting on 30 July 2020, when a prepared statement from Alison Blom-Cooper was read out by the Planning Portfolio Holder, Cllr Bedford, along with the comments, "getting the local plan over the line" and "nothing will stop us getting the plan through". This Agenda item was a late addition to cover the Inspector's letter of 14 July 2020 to EFDC re-the latest 2018-based household projections and the justification for the plan's proposed Green Belt releases (ED111).

TBAG takes the view that, it should be *'the right number of homes in the right places'*, whereas EFDC seem to be acting with expediency being uppermost in its mind. We are concerned that an excessive, unnecessarily high, number of homes built on our Green Belt land, will impact detrimentally on **the environmental integrity of the Epping Forest (SAC & SSSI)** as well as dealing a blow to EFDC's declared (19 Sept. 2019) ***Climate Emergency***, because they are not prepared to reduce the level of development on Green Belt land, which serves beneficial purposes in the sequestration of carbon dioxide (A Green House Gas) and in flood prevention.

We are also concerned by EFDC's long delay in placing documents ED114 and 114A, (their reply to the Inspector's letter of 14 July), onto its local plan website and thus into the public domain. The delay of 19 days (from 4 to 23 September) is unacceptable, especially as the ORS document is 27 pages long and includes much graphical and tabulated data. The 'lost' 19 days meant that interested parties were disadvantaged in having significantly less time to give their full consideration of such detailed information, in the event that the Inspector invited further comments.

TBAG is also aware of the Local Councils' Liaison Meeting (7 Sept. 2020) with EFDC and chaired by Nigel Richardson, Director of Planning. Cllr Mary Dadd (Ongar) asked a question about the ONS 2018-based figures being reduced to 6000, and Mr Richardson replied that "this is all about Green Belt and all Green Belt Councils had been written to", mentioning that it was really one for Ms Blom-Cooper. He then added "It is very clear, the numbers are **not** going to change". No mention was made of Epping Forest. So had EFDC decided, in the light of the recent ORS document (ED114A), not to await on the Inspector's consideration of the matter and her potential, wider consultation?

ED114A, The Opinion Research Services (ORS) Report-September 2020

Note:- In reviewing this report, we have consulted with the **following ONS published documents;**

- (1) Quality and Methodology-Information, by Andrew Nash, 29 June 2020
- (2) Impact of different migration trend lengths, by Andrew Nash, 24 March 2020
- (3) Variant Household Projections for England, 2016-based, by Saffron Weeks, 16 May 2019

Re- the ORS report, we refute the assumptions, methodology and conclusions in the report as it applies to Epping Forest District. Our district, which is 90+% Green Belt, lies just outside of Greater London and attracts migration from adjacent London Boroughs including Redbridge and Waltham Forest. These, in turn, are subject to inward migration from within London and the ONS Reports make it clear that EU Accession has been a major driver of migration into London. This **unlimited** migration will cease under Brexit and so it is wrong to project, into the future, events of the previous decade. Covid 19 will have, at the very least, a medium term impact on economic activity and Jobs. Yet these are not mentioned in the ORS Report, which uses Jobs to justify houses.

The ORS Fig 5 for Epping Forest District, clearly shows what has been going on and the dramatic downwards and ongoing trend taking place - from +1500 at its peak in 2013/14 to only + 550 for 2017/18. Yet, ORS try to justify the use of a 10 year variant method to average out peaks and troughs (and so dilute the clear downward trend) against the fact that a "Systemic Change" (Ref2) has happened because of Brexit, and of course Covid 19. The ONS Report (Ref2) covers the disadvantages of the 10 year method, "dampening the effect of more systemic changes that occurred over the 10 years" and the "multiple methodological changes. For example, internal migration estimates have had 3 different methods over that time **which will necessarily impact on the quality of the figures.**"

ORS also produce a further 2,950 homes, almost as make weight, by way of "adjustments" for suppressed household formation and market signals (with an additional 12% uplift).

Finally, we wonder if the purpose of paragraph 9 of their report, re the endorsement of the Inspector of an aspect of the East Herts local plan, is an attempt to "bounce" the Inspector for Epping Forest District?

Dr John Warren

Chair, Theydon Bois Action Group

4 November 2020