



## Representation form for Submission Version of the Epping Forest District Local Plan 2011-2033 (Regulation 19 publication)

This form should be used to make representations on the Submission Version of the Epping Forest District Local Plan which has been published. Please complete and return by 29 January 2018 at 5pm. An electronic version of the form is available at <http://www.efdclocalplan.org/>

**Please refer to the guidance notes available before completing this form.**

**Please return any representations to:** Planning Policy, Epping Forest District Council, Civic Offices, 323 High Street, Epping, Essex, CM16 4BZ

Or email them to: [LDFconsult@eppingforestdc.gov.uk](mailto:LDFconsult@eppingforestdc.gov.uk)

**BY 5pm on 29 January 2018**

This form has two parts –

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

***Please attach any documents you wish to submit with your representation***

### Part A

1. Are you making this representation as? (Please tick as appropriate)

a) Resident or Member of the General Public  or

b) Statutory Consultee, Local Authority or Town and Parish Council  or

c) Landowner  or

d) Agent

Other organisation (please specify)

**2. Personal Details****3. Agent's Details (if applicable)**

Title	<input type="text"/>	<input type="text" value="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Oliver"/>
Last Name	<input type="text"/>	<input type="text" value="Bell"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Associate Director"/>
Organisation (where relevant)	<input type="text" value="St Congar Provincial c/o Agent"/>	<input type="text" value="Nexus Planning"/>
Address Line 1	<input type="text"/>	<input type="text" value="3 Weybridge Business Park"/>
Line 2	<input type="text"/>	<input type="text" value="Addlestone Road"/>
Line 3	<input type="text"/>	<input type="text" value="Weybridge"/>
Line 4	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text" value="KT15 2BW"/>
Telephone Number	<input type="text"/>	<input type="text" value="01932 837850"/>
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**Part B – If necessary please complete a separate Part B form for each representation**

4. To which part of the Submission Version of the Local Plan does this representation relate?  
(Please specify where appropriate)

Paragraph  Policy  Policies Map

Site Reference  Settlement

5. Do you consider this part of the Submission Version of the Local Plan:  
\*Please refer to the Guidance notes for an explanation of terms

a) Is Legally compliant Yes  No

b) Sound Yes  No

If no, then which of the soundness test(s) does it fail\*

Positively prepared  Effective

Justified  Consistent with national policy

c) Complies with the duty to co-operate Yes  No

6. Please give details of why you consider the Submission Version of the Local Plan is not legally compliant, is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance, soundness of the Local Plan or compliance with the duty to co-operate, please also use this box to set out your comments

Please see attached representations

*(Continue on a separate sheet if necessary)*

7. Please set out what change(s) you consider necessary to make the Submission Version of the Local Plan legally compliant or sound, having regard to the test you have identified in the question above (Positively prepared/Justified/Effective/Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the Submission Version of the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see attached representations

*(Continue on a separate sheet if necessary)*

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

**No**, I do not wish to participate at the hearings

**Yes**, I wish to participate at the hearings

9. If you wish to participate at the hearings, please outline why you consider this to be necessary:

Due to the complex and significant nature of our concerns, it is vital that we are able to participate in the oral hearing sessions.

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

10. Please let us know if you wish to be notified when the Epping Forest District Local Plan is submitted for independent examination (Please tick)

Yes       No

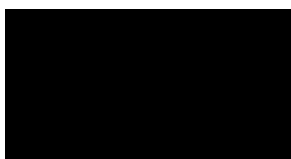
11. Have you attached any documents with this representation?

Yes       No

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Signature:



Date:

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# Representations to Policy SP 2 Spatial Development Strategy 2011-2033

1. Nexus Planning is instructed by St Congar Provincial to prepare representations to the Submission version of the Epping Forest District Local Plan (EFDLP). St Congar Provincial control land at Old Farm, Chigwell (the site).
2. St Congar Provincial is aware that the Council has significantly expedited the Local Plan process in order to enable a submission of the Plan by the end of March 2018. The 14<sup>th</sup> December 2017 Full Council Papers detail that this is specifically to avoid the implications of the housing target required by the Government's standardised housing need methodology. Indeed, the Foreword to the Local Plan highlights the potential *"risk"* of exposing the Council to an increase in the housing requirement, which would increase from 518 per annum (the Council's purported figure) to 923 per annum. The Council's justification for this includes citing the considerable amount of additional work, resource and time delay. Whilst St Congar appreciate the desirability of having an up-to-date Local Plan and therefore plan-led growth, it does not consider that this should be at the expense of adequately addressing the severe and acute housing pressures in the District faces. Furthermore, this approach is at odds with the thrust of the National Planning Policy Framework (NPPF) in respect of housing in terms of the need to *"boost significantly the supply of housing"* (paragraph 47) and to make *"every effort"* (paragraph 17) to meet identified local need, which requires local planning authorities to *"respond positively"* (paragraph 17) to opportunities for growth.
3. In any event, St Congar Provincial considers that the Council's objective assessment of housing need (OAN) is substantially too low, based on upon current guidance, as detailed further below.

## Objectively Assessed Housing Need

4. The housing requirement within the EFDLP is underpinned by the West Essex and East Hertfordshire Strategic Housing Market Assessment, September 2015 and subsequent updates ("the SHMA"). The SHMA concludes that the Full Objectively Assessed Need ("FOAN") for housing in Epping Forest is 12,573 dwellings (572 dwellings per annum ("dpa")) between the period 2011 to 2033. The FOAN for the Wessex and East Hertfordshire Housing Market Area ("the HMA") is 51,710 dwellings (2,350 dpa) over the same 22-year period.

5. However, as set out detail within **Appendix 1**, our review of the SHMA against current national policy set out within the National Planning Policy Framework ("NPPF") and national guidance within the National Planning Policy Framework ("PPG") has concluded that the SHMA fundamentally under assesses FOAN for Epping Forest and the wider HMA. Our concerns regarding the SHMA principally relate to the downward demographic adjustments applied to the official population and household projections but also the SHMA's failure to appropriately respond to worsening market signals.
6. Under the current national policy and guidance, our analysis concludes that FOAN for Epping Forest is 15,696 dwellings between 2011 and 2033 (713 dpa). The resulting FOAN for the HMA as a whole would be 59,273 dwellings between 2011 and 2033 (2,694 dpa).

#### Housing Requirement

7. Paragraph 2.43 of the EFDLP identifies that the full OAN for the District is 12,573 dwellings over the period 2011-2033. We note that even if the Council's OAN figure is accepted (which it is not), Policy SP 2 details that the Council will only plan for a minimum of 11,400 new homes over the period 2011-2033, which is demonstrably lower than the Council's own calculation of OAN. This might be expected where the Council advances a case that it is environmentally constrained and therefore has unmet housing needs however, the Plan does not indicate such a scenario anywhere, save for paragraph 2.43 which suggests that the OAN figure for the District is a starting point and does not take into account environmental policy and infrastructure constraints.
8. St Congar Provincial fully accept that OAN should be a 'policy off' figure however, there is no evidence published by the Council that it cannot accommodate its purported OAN in full. Indeed, the Council's Housing Implementation Strategy (December 2017) actually identifies that over the Plan period the Council will seek to deliver 13,152 dwellings i.e. more than OAN.
9. Accordingly, even if our calculation of OAN is not accepted, Policy SP 2 should be amended to state that a minimum of 12,573 new homes will be allocated. A failure to do so would render the policy unsound, namely failing to be positively prepared as it would not require the Plan to meet OAN, when it is demonstrably capable of doing so.
10. St Congar Provincial is aware that other authorities within the HMA are proposing to deliver in excess of their purported OAN, although Table 2.1 of the EFDLP still shows a shortfall against the OAN for HMA of 600 dwellings. In any event, paragraph 14 of the NPPF identifies that *"Local planning authorities should positively seek opportunities to meet the development needs of their area"*, paragraph 17 advises that *"every effort should be made objectively to identify and then meet the housing...needs of an area"* and paragraph 50 requires LPAs *"to deliver a wide choice of high quality homes, widen opportunity for home ownership and create sustainable, inclusive and mixed communities"*. It is therefore clear that the Council should do everything it can to meet its OAN in full, irrespective of another authority's strategy for growth. Furthermore, paragraph 47 of the Framework requires LPAs to *"boost significantly the supply of housing"*, so the fact that Harlow District Council (HDC) is proposing to exceed

its purported OAN, does not justify another authority within the HMA failing to meet even its demonstrably too low OAN.

11. Notwithstanding the above concerns with the Council's calculation of housing need, we do support the expression of the housing requirement within Policy SP2 of the EFDLP as a minimum, as this approach closely aligns with the requirement of the NPPF to "*boost significantly*" the supply of housing (paragraph 47).

#### Sequential Approach to Housing Allocations

12. Policy SP2 of the Epping Forest District Local Plan (EFDLP) sets out a sequential approach to allocating new sites. Point 'iv' identifies that the Council will offer a relative priority to developing sites located on open space within settlements where such selection would maintain adequate open space provision within the settlement.
13. St Congar Provincial agree that land within built-up areas should be prioritised for development before Green Belt land, in accordance with the National Planning Policy Framework (NPPF), this clearly this relates to previously developed land within built-up areas, rather than cherished open space.
14. The District is clearly facing significant development pressures, with demonstrably insufficient capacity within the built-up area to meet even the Council's own calculation of OAN over the plan period (a figure that we do not accept). As a result, the Council is rightly seeking to make the most efficient and effective use of previously developed land, with Policy SP 3 advocating densities of more than 50 dwellings per hectare in towns and large village centres, which would leave limited opportunities to incorporate meaningful new open space. This alone will place greater pressure upon existing open space within the settlements (as acknowledged at paragraph 4.4 of the EFDLP) but within built up areas, the small scale (and potentially larger scale) intensification of existing residential sites will occur over the Plan period in addition to the allocations currently made, having regard to national policy within such areas. Open space within urban areas is clearly finite and adopting a strategy which actively prioritises building upon such spaces now is only likely to lead to a future deficit, resulting in adverse environmental and social issues that are effectively impossible to resolve, due to the evitable land constraints within built up areas.
15. In this context, it is appropriate to note that chapter 8 of the NPPF sets out the important role the planning system has in promoting healthy communities, with paragraph 73 stating that "*Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.*", and this is echoed in the EFDLP which identifies that "*Open space provision is critical to the physical and mental health of our communities...*" (paragraph 4.44).
16. Overall, St Congar Provincial consider that the Council's strategy to build upon existing open space within built up areas fails to maximise the opportunities presented through the preparation of a new local plan and instead, adopts a short-sighted strategy, which will likely



result in significant long term adverse environmental impacts for residents of urban areas. Instead, St Congar Provincial consider that the Council should allocate more growth on greenfield sites on the edge of sustainable settlements, where greater flexibility exists for development to be properly planned in a coherent manner and with sufficient open space provision to serve a variety of needs.

Distribution of Development

- 17. Part B of Policy SP 2 sets out the Council’s proposed distribution of development, which includes 3,900 dwellings of the Council’s own needs around Harlow, although we note that HDC is already proposing to deliver 1,791 dwellings more than its purported OAN over the period 2011-2033 (9,200 in total).
- 18. St Congar Provincial note that the HMA authorities are proposing to allocate significant growth on the edge of Harlow, in order to support its regeneration. Whilst St Congar Provincial do, to some degree, understand the rationale for allocating significant growth in one particular area, this must be considered against other housing pressures in the HMA.
- 19. For example, the NOMIS travel to work data (2011) shows that the greatest number of residents commuting out of Epping Forest go to the City of London (18%), which increases to 89% of all out commuting for the District when combined with data for other London Boroughs. It is therefore clear that a significant driver for housing pressures in the area (and therefore issues of affordability) derive from a demand for housing in locations easily commutable to London. St Congar Provincial consider that this is a critical consideration for the distribution of development proposed within Epping Forest District, which appears to have been somewhat overlooked in the Plan. For example, we note that Harlow, which is due to receive substantial growth experiences the majority of out-commuting to Epping Forest and East Hertfordshire and as a result, it is not seen as commuting location for London relative to other authorities within the HMA with, only 7% travelling to the City of London and 20% travelling to London Boroughs as a whole.
- 20. The Council’s Settlement Hierarchy Technical Paper (2015) provides the evidence base that establishes the settlement hierarchy across the District. It is understood that the settlement hierarchy was determined by identifying the range of services and facilities available within each place. The scoring methodology for defining settlement categories is set out below:

<b>Settlement Category</b>	<b>Combined Facilities</b>
Town	21+
Large Village	14-20
Small Village	7-13
Hamlet	0-6

- 21. St Congar Provincial note that Chigwell scored 20 points and was therefore at the highest end of the 'Large Village' category and only one point away from a Town designation, based on access to services and facilities. This is the highest performing Large Village, save for Buckhurst Hill (noting that this settlement actually scored sufficiently high to be a Town but the Council

opted to define it as a Large Village), but is only proposed for limited growth in the EFDLP (376 dwellings). In respect of the sustainability credentials associated with Chigwell paragraph 3.11 of the Settlement Hierarchy Paper states that:

*"...due to a combination of (i) a frequent bus service, (ii) Central Line stations, and (iii) a range of education and health facilities the more densely populated settlements have a greater level of accessibility. This applies particularly to Loughton, Buckhurst Hill and Chigwell."*

22. As detailed earlier, the NOMIS travel to work data (2011) shows that the greatest number of residents commuting out of Epping Forest go to the City of London and other boroughs within London. Furthermore, paragraph 1.38 of the Plan advises that there is a high use of "Underground, metro, light rail or tram" public transport for commuting from the District due to the proximity of London and the presence of many London Underground Central Line stations in the District, such as Chigwell. Indeed, the NOMIS travel to work data shows that 29% of all out commuting from the District is via the underground alone.
23. The spatial strategy proposed within the Plan does not therefore appear to adequately consider that a significant driver for housing pressures in the area derive from a demand for housing in locations easily commutable to London. Concerns with the level of growth proposed at Harlow have already been highlighted but it is also noted that North Weald Bassett, the worst performing Large Village (having regard to the Settlement Hierarchy Paper), yet the settlement is proposed for the highest level of housing growth within its category (and indeed the third highest in the District), does not benefit from any railway links to London with the closest being more than 3 miles away.
24. Conversely, Chigwell is located geographically close to London and on a key commuter line and therefore provides a clear opportunity to locate new homes closest to the source of demand, where significant housing pressures exists, as exhibited by higher than average house prices for the area.
25. Furthermore, in adopting basic sustainability principles, and in accordance with the NPPF (paragraphs 27 and 34) the Council should be allocating a greater proportion of housing on the edge of the wider London urban area, closest to the source of demand or on desirable public transport commuter lines, both of which apply to Chigwell.
26. Policy SP2 proposes to deliver only 376 new dwellings at Chigwell over the EFDLP period (17 dpa). A level of growth that represents only 3.2% of the planned housing growth within the District.
27. In light of the level of planned housing growth at Chigwell we have assessed the extent to which 17 dpa is an appropriate level of housing growth to support the settlements projected demographic-based housing needs over the EFDLP period.

28. As set out in detail within Appendix 1, our assessment concludes that the level of population change resulting from constraining housing growth to only 376 dwellings will result in a population change significantly lower than historical trends. Indeed the settlement's population change will shift from longstanding positive growth at around 0.75% per annum to only around 0.35% per annum. The consequence being that Chigwell's population change will shift towards stagnation and potential decline over the longer time period. Furthermore, our analysis demonstrates that constraining housing growth to 376 dwellings will result in a declining working age population.
29. Overall, our Chigwell housing need analysis concludes that the most appropriate level of housing growth over the EFDLP period is 1,544 dwellings (70 dpa). This level of housing growth aligns with the settlement's long-term population change trends; will help to maintain a balanced and mixed demographic population structure; will help address worsening market signals; and will maintain Chigwell's role within the District's settlement hierarchy.
30. For the reasons set out above, and having regard to paragraph 182 of the NPPF, it is considered the EFDLP is unsound in failing to be the most appropriate strategy, namely not allocating sufficient growth at Chigwell.

#### **Suggested Change**

31. The Council should update its assessment of FOAN for the District and increase it to 15,696 dwellings over the period 2011-2033 (713 dpa).
32. If our OAN figure is not accepted, Policy SP 2 should at least be amended to include provision for a minimum of 12,573 new homes over the Plan period, as opposed to the current figure of 11,400 new homes.
33. The relative priority given to developing open space within built up areas should be significantly reduced in the sequential approach set out within Policy SP 2.
34. The distribution of housing should be revised to include a greater proportion of housing in settlements with stronger commuting links to London, such as Chigwell. We consider Chigwell should accommodate 1,544 dwellings over the Plan period.

# **Appendix 1: Epping Forest OAN Review**

NEXUS  
PLANNING

# Epping Forest OAN Review

**on behalf of St Congar Provincial**

January 2018



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## 1.0 Introduction

- 1.1 The housing requirement within the Regulation 19, Epping Forest District Local Plan ("the LP") is underpinned by namely the: (a) West Essex and East Hertfordshire Strategic Housing Market Assessment, September 2015 ("the SHMA September 2015"); (b) The Updating the Overall Housing Need, August 2016 update ("the SHMA, August 2016 Update"); and (c) The Establishing the Full Objectively Assessed Need, July 2017 ("the SHMA, July 2017 Update"). Within this report, the above are collectively referred to the "SHMA".
- 1.2 The SHMA July 2017 Update concludes (Figure 5) that the Full Objectively Assessed Need ("FOAN") for housing in Epping Forest is 12,573 dwellings (572 dwellings per annum ("dpa")) between the period 2011 to 2033 ("the LP period"). The FOAN for the Wessex and East Hertfordshire Housing Market Area ("the HMA") is 51,710 dwellings (2,350 dpa) over the same 22-year period. The approach and conclusion taken within the SHMA (for Epping and the wider HMA) is summarised within Table 1 below:

<b>Table 1.1: SHMA Aug 2016 Update FOAN</b>		
<b>Stage</b>	<b>Epping Forest (per annum)</b>	<b>HMA (per annum)</b>
<b>HOUSEHOLDS</b>		
<b>Demographic Starting Point</b> (Ministry for Housing, Communities and Local Government ("MHCLG") Household Projections)	14,374 (653)	50,688 (2,304)
<b>Adjustment for local demographic factors and migration trends</b> (UPC and 10-year migration trends)	-3,806 (173)	-6,939 (315)
<b>Household Starting Point</b>	10,560 (480)	43,758 (1,989)
<b>DWELLINGS</b>		
<b>Housing need base on household projections taking account of local circumstances</b>	11,065 (503)	45,507 (2,069)
<b>Further adjustments</b>	In response to balancing jobs and workers	0 (0)
	In response to market signals, suppressed household formation and migration pressures	1,508 (68)
<b>FOAN 2011-33</b>	<b>12,573 (572)</b>	<b>51,710 (2,350)</b>



- 1.3 Our review of the SHMA against current national policy set out within the National Planning Policy Framework (“NPPF”) and national guidance within the National Planning Policy Framework (“PPG”) has concluded that the SHMA under assesses FOAN for Epping Forest and the wider HMA. Our concerns regarding the SHMA are set out within the remainder of this report and principally relate to the following aspects:
- (a) Demographic starting-point housing figure; and
  - (b) Market signals adjustments.
- 1.4 In addition to reviewing FOAN for Epping Forest we have also considered the demographic-led housing needs of Chigwell to understand the extent to which planned housing needs over the LP period will meet the settlements projected demographic housing needs.

## 2.0 Demographic Starting Point

- 3.1 The PPG is clear (ID: 2a-015) that household projections published by the Department for Communities and Local Government (now the Ministry of Housing, Communities and Local Government (“MHCLG”)) should provide the starting point estimate of overall housing need.
- 3.2 The demographic starting-point figures within the SHMA (14,374 households for Epping Forest and 50,688 households for the HMA as a whole) are based on the 2014-based HHP. The 2014-based HHP is underpinned by the 2014-based SNPP. Although these projections are almost two years old, and are soon to be superseded by the 2016-based projections, they currently remain to be the most up-to-date official household and population projections.
- 3.3 To convert households into dwellings the SHMA applies vacancy rates derived from the 2011 Census (SHMA, Sept 2015, paragraph 3.77). Although the Census 2011 data is now dated (7-years old), we broadly support this approach.
- 3.4 Based on the official 2014-based projections (the PPG ID: 2a-015 starting point) and the same vacancy and second home rates applied within the SHMA, we have calculated within Table 3.1 below, the demographic based starting point housing figures for Epping and the HMA as a whole:

<b>Table 3.1: Starting Point Outputs for the SHMA period (2011 to 2033)</b>			
<b>Area</b>	<b>Population Change 2011 to 2033 (per annum)</b>	<b>Household Change 2011 to 2033 (per annum)</b>	<b>Dwelling Change 2011 to 2033 (per annum)</b>
Epping Forest	30,120 (1,369)	14,374 (653)	14,834 (674)
HMA	105,056 (4,775)	50,697 (2,304)	52,571 (2,390)

- 3.5 However, as set out within Table 1 above, whilst the SHMA July 2017 Update demographic ‘household’ starting point is taken from the 2014-based HHP, the SHMA has applied significant downward adjustments for local demographic factors and migration trends (a meaningful 3,806 households for Epping Forest (26.5%) and 6,939 households for the HMA as a whole (13.2%).
- 3.6 It is accepted that the PPG does outline (ID: 2a-017) that ‘plan makers may consider sensitivity testing, specific to local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates. Account should also be taken to the most

recent demographic evidence, including the Office for National Statistics population evidence'. However, the PPG is expressly clear that 'any local changes would need to be clearly explained and justified on the basis of established sources of robust evidence'.

3.7 As set out within the remainder of this section, contrary to national guidance, the SHMA demonstrably fails to justify, based on robust local evidence, the demographic adjustments made for Epping Forest or the wider HMA. Our concerns principally relate to two key areas:

- (a) Migration trends; and
- (b) Unattributable Population Change.

### **Migration Trends**

3.8 The SHMA, September 2015 outlines (paragraph 3.30) that '10-year trend migration scenarios are more likely to capture both highs and lows and are not as dependant on trends that may be unlikely to be repeated. Therefore, we favour using 10-year migration trends as the basis for our analysis'. It is also noted that the SHMA, August 2016 outlines (paragraph 16) that following a Planning Inspectorate Advisory Visit to East Hertfordshire it was agreed that a 10-year trend period was more appropriate than the 5-year trend period used within the official population and household projections.

3.9 Whilst we accept that migration flows within Epping Forest, and the wider HMA more generally, fluctuate on an annual basis; and that a 10-year trend can help to smooth out unusually high peaks and troughs, we are mindful that the PPG is clear (ID: 2a-017) that any local changes made to the official household projections need to be clearly justified.

3.10 However, no evidence is presented within the SHMA to demonstrate that the 5-year internal and 6-year international migration trends for Epping Forrest, which underpin the 2014-based SNPPs, are not likely to broadly continue into the future, i.e. they have been influenced by short term shock factors within the past five years, such as the recession, a large employer moving in or out of an area, or the expansion of an education facility etc.

3.11 Without this local evidence the approach taken within the SHMA currently fails the NPPF paragraph 182 'justified' soundness test and does not follow the requirements prescribed within the PPG (ID: 2a-017).

3.12 However, whilst we have some reservations over the lack of local Epping Forest specific evidence presented within SHMA, our own analysis of migration trends would suggest there is potentially a degree of annual fluctuation volatility within Epping Forest, which could skew projections based on shorter-term trend periods. In view of this, we would broadly support the need to at least consider 10-year migration trends alongside the shorter 5- / 6-year migration trend methodology applied by the ONS.

### Unattributable Population Change

3.13 The SHMA July 2017 Update infers (paragraph 2.6) that the 2014-based SNPP, and therefore the 2014-based HHP, are not robust as the 2014-based SNPP do not take into account the corrections that ONS make to reconcile the mid-year population estimates ("MYE") component of change data with the Census. The SHMA, September 2015 outlines (paragraph 3.17) that the correction made by the ONS for the HMA as a whole was almost -2,000 persons (the actual figure is -1,940 persons). A figure which represents only approximately 1.9% of the England wide (-104,000 persons) correction made. Specifically for Epping Forest, the correction made was -1,600 persons (82.5% of the HMA wide correction total).

3.14 However, the view that the projections prepared by the Government body responsible for population projections are not robust is not justified. Alongside the 2014-based SNPP, the ONS issued a Quality and Methodology Information paper ("the ONS Q&MIP"). This paper sets out that '*rigorous quality assurance is carried out at all stages of production*' of the population projections and that '*specific procedures include:*

- *scrutinising input data to investigate the accuracy of any abnormal values*
- *scrutinising trends in the total population and components of change projected over time for plausibility*
- *comparing current projections with previous projections and population estimates, to see where large changes are taking place and understand the reasons for these*
- *examining sex ratios to find any areas of imbalance*
- *double-checking output tables to ensure that there are no errors or inaccuracies during the*

*creation of published tables’.*

3.15 Whilst it is acknowledged that an additional component of population change, referred to as Unattributable Population Change (“UPC”), was incorporated into the 2001-2011 MYE’s following the Census 2011 to make allowances for methodological changes and estimated errors in the components over the 2001-2011 period, for the reasons set out below, it is not accepted that any UPC adjustments for Epping Forest and the wider HMA can be robustly applied.

3.16 Specifically regarding UPC the ONS Q&MIP states:

*“It was proposed not to make an adjustment for UPC in the 2012-based (or, subsequently, the 2014- based) subnational population projections or in the series of population estimates based on the 2011 Census since the UPC is unlikely to be seen in continuing subnational trends as:*

- it is unclear what proportion of the UPC is due to sampling error in the 2001 Census, adjustments made to population estimates following the 2001 Census, sampling error in the 2011 Census and/or error in the intercensal components (mainly migration)*
- if it is caused by either the 2001 Census or 2011 Census, then the components of population change will be unaffected*
- if it is caused by international migration, it is likely that the biggest impacts will be seen earlier in the decade between 2001 and 2011 and will have less of an impact in the later years when improvements were introduced to migration estimates*

*An adjustment for UPC would only be made if it could be demonstrated that it measured a bias in the trend data that would continue into the future. Quality assurance of the 2012-based subnational population projections did not reveal any problems indicating that adjustments for UPC were necessary and the resulting projections generally appeared to better reflect trends across all the local authorities than recent sets of projections.*

*As part of the 2012-based subnational population projections consultation, users were consulted on the proposals for handling UPC in the 2012-based subnational population projections. A projections consultation paper explained how UPC had occurred and the reasons behind the decision not to make an adjustment for UPC. The majority of users (72%) who responded to the consultation agreed with the approach not to make an adjustment. The remainder (28%) either*

*disagreed or asked for an additional set of variant subnational population projections to be produced which include an adjustment for UPC. The consultation responses were published after the consultation alongside the consultation papers.*

*Following the approach taken with the 2012-based subnational projections, the 2014-based subnational projections do not include an adjustment for UPC".*

- 3.17 No evidence is presented within the SHMA that confirms the extent to which the UPC for Epping Forest relates to Census 2001 and / or 2011 Census errors. Furthermore, nor has any evidence presented over which migration flow(s) the UPC relates. Consequently, the UPC adjustment made within SHMA is neither justified nor credible.
- 3.18 We are firmly of the view that UPC adjustments should not be applied when assessing the demographic starting point housing figure for Epping Forest or the wider HMA – a view, as set out above, shared by the ONS, the Government body for responsible population estimates and projections.

## 4.0 Market Signals

4.1 The PPG is clear (ID: 2a-020) that a worsening trend in any market signal indicator will require upward adjustment to planned housing numbers compared to ones based solely on household projections.

4.2 Overall, there is no doubt that a market signals adjustment is necessary within Epping Forest and the wider HMA more generally. Indeed, the SHMA July 2017 Update confirms (paragraphs 3.21 to 3.22):

*“Based on the housing market signals indicators for the West Essex and East Hertfordshire HMA, the original SHMA was right to propose a 20% uplift overall given the need to increase migration (to align jobs and workers) and address suppressed household formation.*

*An increase of 20% in response to market signals would also be consistent with other HMAs experiencing considerable housing market pressures...”.*

4.3 The PPG (ID: 2a-020) does not provide any guidance on what scale of uplift should be applied to the demographic starting point housing figure (with appropriate demographic adjustments). But what is clear from the PPG is that the response should lead to a shift in the balance of demand and supply such that affordability pressure might ease over time. In the context of the significant, affordability issue within Aylesbury and the wider HMA the market signals uplift should reasonably be a ‘large additional supply response’.

4.4 However, against the background of worsening market signals the Council’s latest SHMA Update (July 2017) (paragraph 3.25) now concludes that an uplift of only 13.6% represents the most appropriate ‘reasonable’ uplift. An uplift 6.4 percentage points lower than previously concluded as a PPG (ID: 2a-020) compliant ‘reasonable’ uplift.

4.5 Although not currently formal national policy or guidance, it is noted that based on the Governments proposed revised standardised methodology for calculating housing need that a 40% (the maximum) uplift would be applied to help address worsening signals within Epping Forest. Given that emerging Government policy indicate that uplifts of 40% are wholly ‘reasonable’, it demonstrably cannot be accepted that a 20% uplift (only half) is unreasonably high.

4.6 In light of the above, we are firmly of the view that the evidence within the SHMA undoubtedly supports the need for a 20% uplift and that this level of uplift is reasonable in the context of both current and

emerging national policy and guidance.

- 4.7 Based on the official 2014-based projections (the PPG ID: 2a-015 starting point) and the same vacancy and second home rates applied within the SHMA (Table 3.1 above), we have calculated within Table 4.1 below, the demographic based starting point housing figures for Epping and the HMA as a whole with a 20% market signals uplift

<b>Table 4.1: Epping Forrest Alternative Demographic Starting Point Scenarios with Market Signals Uplift</b>		
<b>Area</b>	<b>Demographic Starting Point Dwelling change between 2011-33 (per annum)</b>	<b>20% Market Signals Uplift Dwelling change between 2011-33 (per annum)</b>
<b>Epping Forest</b>	14,834 (674)	17,801 (809)
<b>HMA</b>	52,571 (2,390)	63,085 (2,868)



## 5.0 Alternative FOAN Assessment

5.1 In light of the above, to understand the sensitivities associated with shorter (5/6-years) and longer (10-year) migration trends and UPC assumptions applied when assessing FOAN for Epping Forest and the wider HMA, Nexus Planning have prepared, using the POPGROUP demographic projection software, the following alternative demographic starting point figure scenarios covering the period 2011 to 2033 (Table 5.1):

Table 5.1: Alternative Scenarios	
Scenario	Scenario Assumptions
<b>Scenario 1:</b> 2014-SNPP updated to reflect MYEs	Population: MYE's between 2011 and 2016 Fertility and Mortality: 2014-based SNPP rates Internal Migration: 5-year trends between 2009/10 and 2013/14 International Migration: 6-year trends 2008/09 and 2013/14
<b>Scenario 2:</b> 2015 based 10-year trends	Population: MYE's between 2013 and 2016 Fertility and Mortality: 2014-based SNPP rates Internal Migration: 10-year trends between 2004/05 and 2014/15 International Migration: 10-year trends between 2004/05 and 2014/15
<b>Scenario 3:</b> 2015 based short term trends	Population: MYE's between 2013 and 2016 Fertility and Mortality: 2014-based SNPP rates Internal Migration: 5-year trends between 2010/11 and 2014/15 International Migration: 6-year trends 2009/10 and 2014/15
<b>Scenario 4:</b> 2016 based 10-year trends	Population: MYE's between 2013 and 2016 Fertility and Mortality: 2014-based SNPP rates Internal Migration: 10-year trends between 2005/06 and 2015/16 International Migration: 10-year trends between 2005/06 and 2015/16
<b>Scenario 5:</b> 2016 based short term trends	Population: MYE's between 2013 and 2016 Fertility and Mortality: 2014-based SNPP rates Internal Migration: 5-year trends between 2011/12 and 2015/16 International Migration: 6-year trends 2010/11 and 2015/16

5.2 For each scenario, we have also applied the same household formation and vacancy rate assumptions:

**Household Formation Rates:** 2014-based HHP household formation rates.

**Vacancy Rates:** Census 2011 rates held constant over the period between 2011 and 2033.

5.3 The projection outputs for each scenario for Epping Forest are summarised within Table 4 and for the HMA within Table 5 below.

<b>Table 5.2: Epping Forest Alternative Demographic Starting Point Scenarios</b>			
<b>Scenario</b>	<b>Population change between 2011 and 2033 (per annum)</b>	<b>Household change between 2011 and 2033 (per annum)</b>	<b>Dwelling change between 2011 and 2033 (per annum)</b>
<b>Scenario 1:</b> 2014-SNPP updated to reflect MYEs	29,819 (1,355)	14,178 (644)	14,846 (675)
<b>Scenario 2:</b> 2015 based 10-year trends	25,947 (1,179)	12,894 (586)	13,502 (614)
<b>Scenario 3:</b> 2015 based short term trends	27,718 (1,260)	13,042 (593)	13,656 (621)
<b>Scenario 4:</b> 2016 based 10-year trends	25,136 (1,143)	12,492 (568)	13,080 (595)
<b>Scenario 5:</b> 2016 based short term trends	27,338 (1,243)	13,041 (593)	13,656 (620)

<b>Table 5.3: HMA Alternative Demographic Starting Point Scenarios</b>			
<b>Scenario</b>	<b>Population change between 2011 and 2033 (per annum)</b>	<b>Household change between 2011 and 2033 (per annum)</b>	<b>Dwelling change between 2011 and 2033 (per annum)</b>
<b>Scenario 1:</b> 2014-SNPP updated to reflect MYEs	104,700 (4,759)	50,437 (2,293)	52,452 (2,384)
<b>Scenario 2:</b> 2015 based 10-year trends	94,817 (4,310)	47,362 (2,153)	49,247 (2,239)
<b>Scenario 3:</b> 2015 based short term trends	99,171 (4,508)	48,593 (2,209)	50,529 (2,297)
<b>Scenario 4:</b> 2016 based 10-year trends	95,606 (4,346)	47,506 (2,159)	49,394 (2,245)
<b>Scenario 5:</b> 2016 based short term trends	100,421 (4,565)	49,291 (2,240)	51,249 (2,330)

- 5.4 For Epping Forest, the migration trend scenarios result in a demographic based housing figure range of between 13,080 and 14,846 dwellings over the period 2011 to 2033. For the wider HMA the range is between 49,247 and 52,454 dwellings over the same period. What is evident from the five-migration trend scenarios tested is that the shorter-term migration trend scenarios are consistently higher than the 10-year trend scenarios. This is potentially a reflection of notably high level of net migration on 2013/14.
- 5.5 Overall, we consider that the alternative Scenario 4 and 5 represent the most up-to-date demographic assessment of housing needs within Epping Forest and the wider HMA. However, given as previously referred, that annual migration flows within the HMA are fairly volatile, we conclude that Scenario 4, which is underpinned by the latest 10-year migration trends (2006 and 2016), is the most justified demographic starting point housing figure for Epping Forest and the wider HMA.

5.6 However, as referred above, we are also firmly of the view that an uplift of at least 20% above the demographic starting point figure for Epping Forest, and the wider HMA, is justified and reasonable. In light of this, we have calculated within Tables 5.4 and 5.5 below, the resulting Epping Forest and overall HMA housing figures for our Alternative Demographic Scenarios with a 20% upward market signals adjustment. Whilst we conclude that Scenario 4 is the most justified starting point figure, for completeness we have also calculated the 20% uplift for all scenarios assessed.

Table 5.4: Epping Forrest Alternative Demographic Starting Point Scenarios with Market Signals Uplift		
Scenario	Demographic Starting Point Dwelling change between 2011-33 (per annum)	20% Market Signals Uplift Dwelling change between 2011-33 (per annum)
Scenario 1: 2014-SNPP updated to reflect MYEs	14,846 (675)	17,815 (810)
Scenario 2: 2015 based 10-year trends	13,502 (614)	16,202 (736)
Scenario 3: 2015 based short term trends	13,656 (620)	16,387 (745)
<b>Scenario 4: 2016 based 10-year trends</b>	<b>13,080 (595)</b>	<b>15,696 (713)</b>
Scenario 5: 2016 based short term trends	13,656 (620)	16,387 (745)

Table 5.5: HMA Alternative Demographic Starting Point Scenarios with Market Signals Uplift		
Scenario	Demographic Starting Point Dwelling change between 2011-33 (per annum)	20% Market Signals Uplift Dwelling change between 2011-33 (per annum)
Scenario 1: 2014-SNPP updated to reflect MYEs	52,452 (2,384)	62,942 (2,861)
Scenario 2: 2015 based 10-year trends	49,247 (2,239)	59,096 (2,686)
Scenario 3: 2015 based short term trends	50,529 (2,297)	60,635 (2,756)
<b>Scenario 4: 2016 based 10-year trends</b>	<b>49,394 (2,245)</b>	<b>59,273 (2,694)</b>
Scenario 5: 2016 based short term trends	51,249 (2,330)	61,499 (2,795)

5.7 Overall, we therefore conclude that for Epping Forest our Alternative Scenario 4 provides the most appropriate and justified demographic starting point housing figure (13,080 dwellings). A starting point housing figure some 1,754 dwellings (11.8%) lower than the PPG demographic starting point housing figure (14,834 dwellings), which is based on the unadjusted official 2014-HHPs (Table 3.1 above).

- 5.8 However, in response of worsening market signals within Epping Forest and the wider HMA, we conclude that an upward adjustment of at least 20% is necessary, reasonable and justified. With an appropriate market signals adjustment, the resulting **FOAN for Epping Forest is 15,696 dwellings between 2011 and 2033 (713 dpa)**. The resulting FOAN for the HMA as a whole would be 59,273 dwellings between 2011 and 2033 (2,694 dpa).
- 5.9 Whilst under the current national policy and guidance we conclude that the FOAN for Epping Forest is 713 dpa, we are very mindful that the Government is proposing to imminently introduce a revised standardised methodology for assessing housing needs. Under this emerging methodology, the resulting FOAN for Epping Forest is 923 dpa. In light of this, we would recommend that Epping Forest should commit to an immediate LP review once the emerging LP is adopted.

## 6.0 Assessment of Chigwell's Housing Needs

- 6.1 Policy SP2 of the emerging LP proposes to deliver only 376 new dwellings at Chigwell over the LP period (17 dpa). A level of growth that represents only 3.2% of the planned housing growth within the District.
- 6.2 In light of the LP's planned housing distribution, the remainder of this section assesses the extent to which 17 dpa is an appropriate level of housing growth to support Chigwell's projected demographic-based housing needs over the LP period (2011 to 2033).
- 6.3 Although the Chigwell settlement boundary is not defined, the settlements approximate area, for the purpose of the demographic analysis within this report, has been defined using ONS Lower Super Output Areas ("LSOAs").

### Population Change Trends

- 6.4 As illustrated within Table 6.1 below, over the past 15-years (for which data is available) the population of Chigwell has broadly remained at around 10% of the District's total population.

Table 6.1: Population Change Trends - Chigwell and Epping Forest				
Area	Population 2001	Population 2006	Population 2011	Population 2016
Chigwell	12,448	12,638	13,012	13,708
Epping Forest	120,896	122,530	124,880	130,321
Proportion of Epping Forest Population	10.3%	10.3%	10.4%	10.5%

- 6.5 If Chigwell is to remain as a settlement that is home to broadly 10% of the District's resident population then approximately 10% of future housing growth should theoretically be apportioned to Chigwell. The LP apportionment of 3.2% is clearly meaningfully lower than 10%.
- 6.6 By way of illustration and without prejudice to our overarching concerns regarding the assessment of FOAN at the District and HMA level, based on the LP Policy SP2 figure of 11,400 dwellings (which is not accepted) a 10% apportionment to Chigwell would equate to 1,140 dwellings (52 dpa). Based on the Council's purported FOAN figure of 12,573 dwellings (which is also not accepted) a 10% apportionment to Chigwell would equate to 1,272 dwellings (58 dpa). Based on our alternative assessment of FOAN for Epping Forest (15,696 dwellings) a 10% apportionment to Chigwell would equate to 1,570 dwellings

(71 dpa).

6.7 As illustrated within Graphic 6.1 and Table 6.2 below, the rate of population change within Chigwell has progressively increased over the past 15 years. Over the past 5-years Chigwell’s population has grown by an average of 0.87% per annum compared to 0.82% over the past 10 years and 0.64% over the past 15 years. The rate of population change within Chigwell over the past five years appears to have notably increased in comparison to longer term trends.

**Graphic 6.1: Chigwell Population Trends**

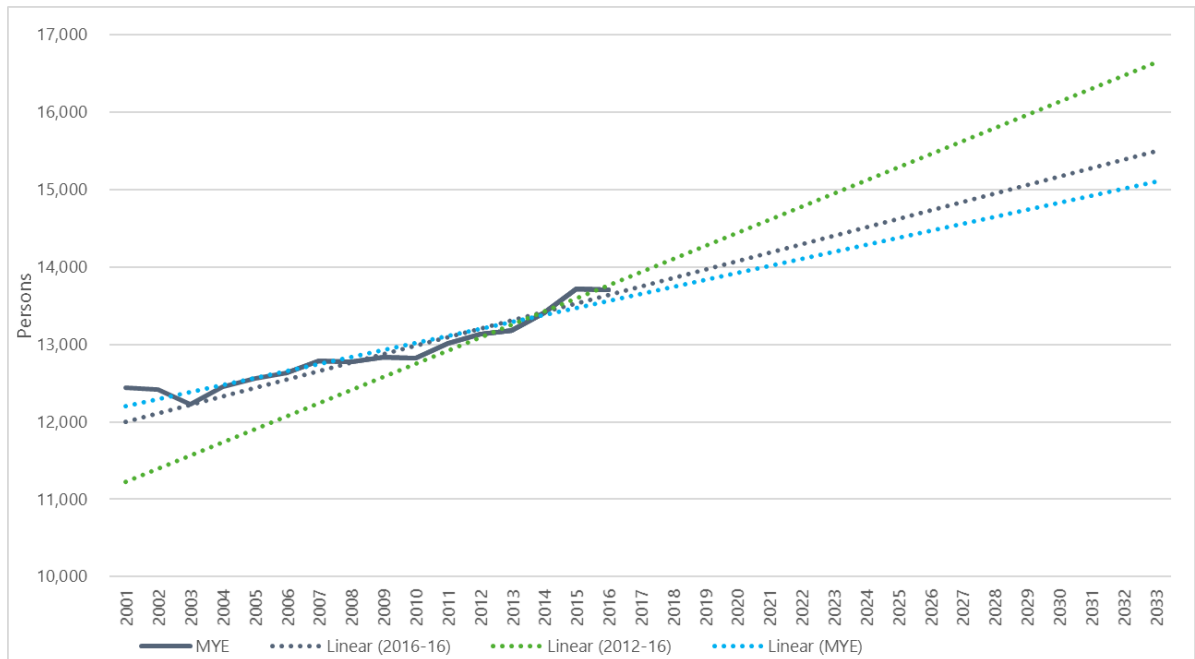


Table 6.2: Rate of Population Change – Chigwell and Epping Forest						
	2001-16		2006-16		2011-16	
	Absolute Change	CAGR	Absolute Change	CAGR	Absolute Change	CAGR
<b>Chigwell</b>	1,260	0.64%	1,070	0.82%	580	0.87%

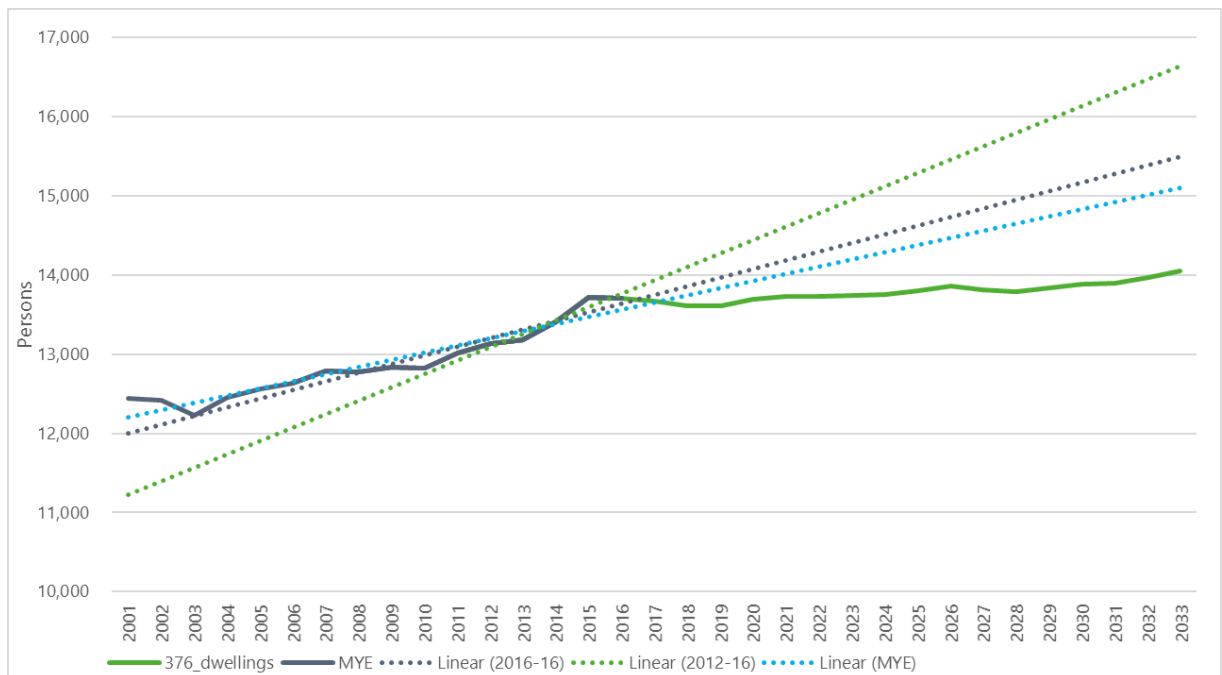
**Planning Housing Growth**

6.8 To understand the implications of planned housing growth of 376 dwellings at Chigwell over the LP period against historic population change we have modelled, using the POPGROUP projection software, Chigwell’s population change over the LP period if population and household growth is constrained by delivery of 376 dwellings (17 dpa). The Council’s LP housing trajectory for Chigwell (LP,

Appendix 5) has been applied within our demographic modelling.

- 6.9 As illustrated within Graphic 6.2 below, the level of population change resulting from delivery of 376 dwellings (S4\_376) is significantly lower than historical trends. Indeed the settlement population change will shift from longstanding growth towards stagnation and potential decline over the longer time period. Annual population change over the LP period would drop to only 0.35% per annum. The settlements population by 2033 would reduce to approximately 9.2% of the overall District population.

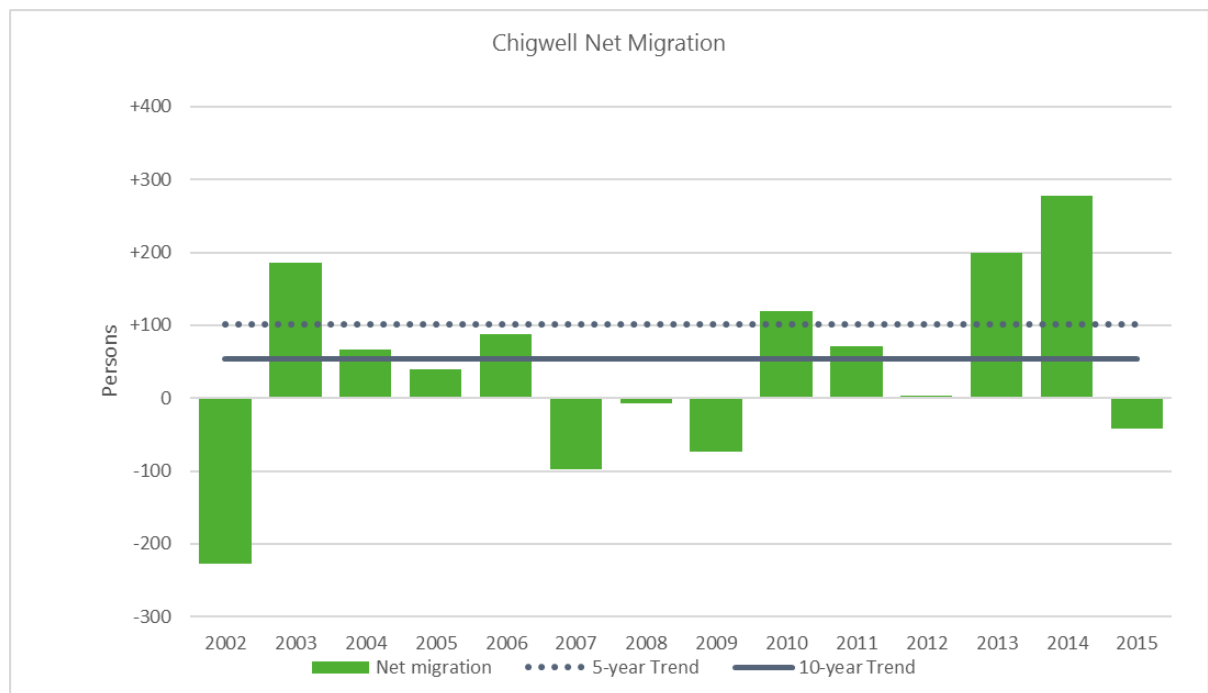
**Graphic 6.2: Chigwell Population Trend and Projected (376 dwellings per annum)**



**Chigwell’s Demographic-Based Housing Needs**

- 6.10 To understand Chigwell demographic based starting point housing figure should be if population and household change was not unnecessarily constrained by housing growth we have modelled Chigwell’s unconstrained demographic-based population, household and dwelling needs.
- 6.11 As illustrated within Graphic 6.3 below, analysis of Chigwell’s migration flow trends show notable annual net migration fluctuations. In light of this, we have applied 10-year migration trends within our Chigwell projection analysis. Our Chigwell scenario is referred to as ‘Chigwell S4’. As referred above, the application of 10-year trends is an accepted way of helping smooth out peaks and troughs in annual migration flows.

**Graphic 6.3: Chigwell Net Migration Trends**



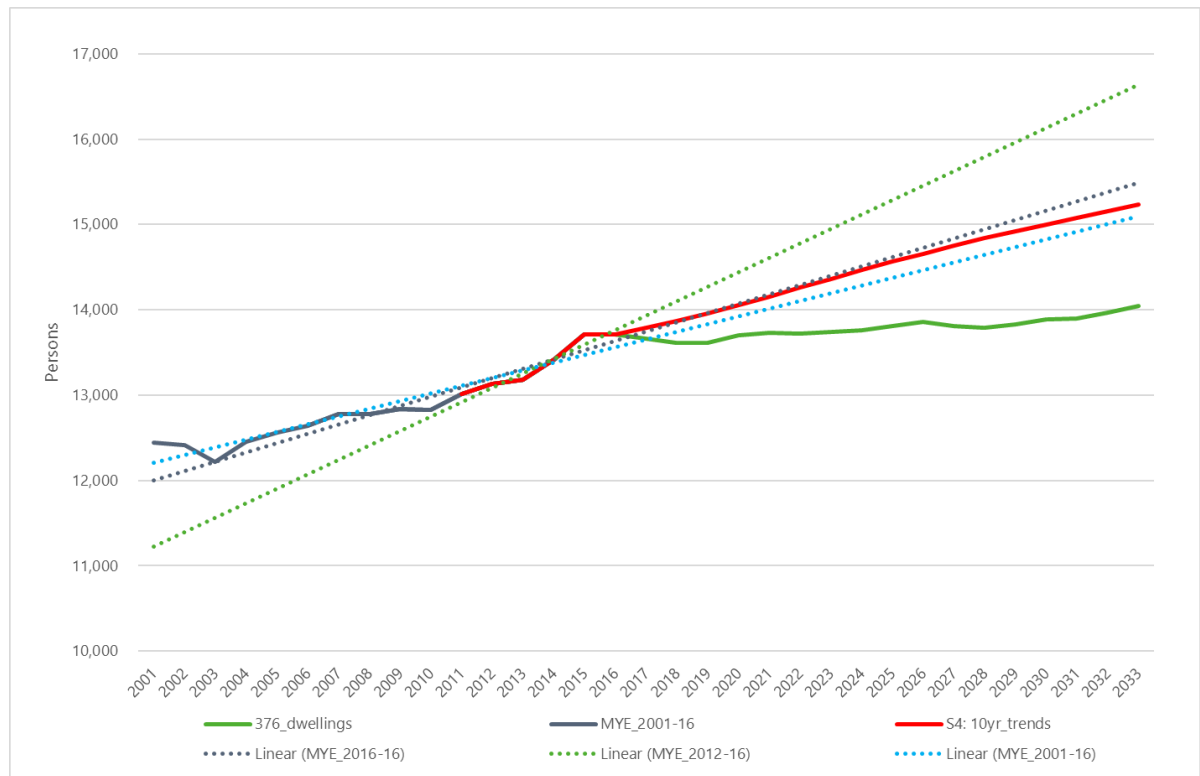
6.12 Our Chigwell S4 scenario represents a demographic-led apportionment of the overarching District S4 scenario (10-year migration trends between 2006 and 2016). The key outputs of our Chigwell S4 scenario are summarised within Table 6.3 below:

Table 6.3: Chigwell S4 Demographic-Led Scenario			
Scenario	Population change between 2011 and 2033 (per annum)	Household change between 2011 and 2033 (per annum)	Dwelling change between 2011 and 2033 (per annum)
Scenario Chigwell S4: 10 year migration trends between 2006 and 2016	2,219 (101)	1,230 (56)	1,287 (59)

6.13 As illustrated within Graphic 6.4 below the level of projected population change falls within short and long-term population change trend lines for Chigwell. Indeed the projected rate of population change is 0.72% per annum, which falls within the range observed over the 10- and 15-year trends. The settlements proportion of the overall District population at the end of the LP period would remain at broadly unchanged at 10.2%.

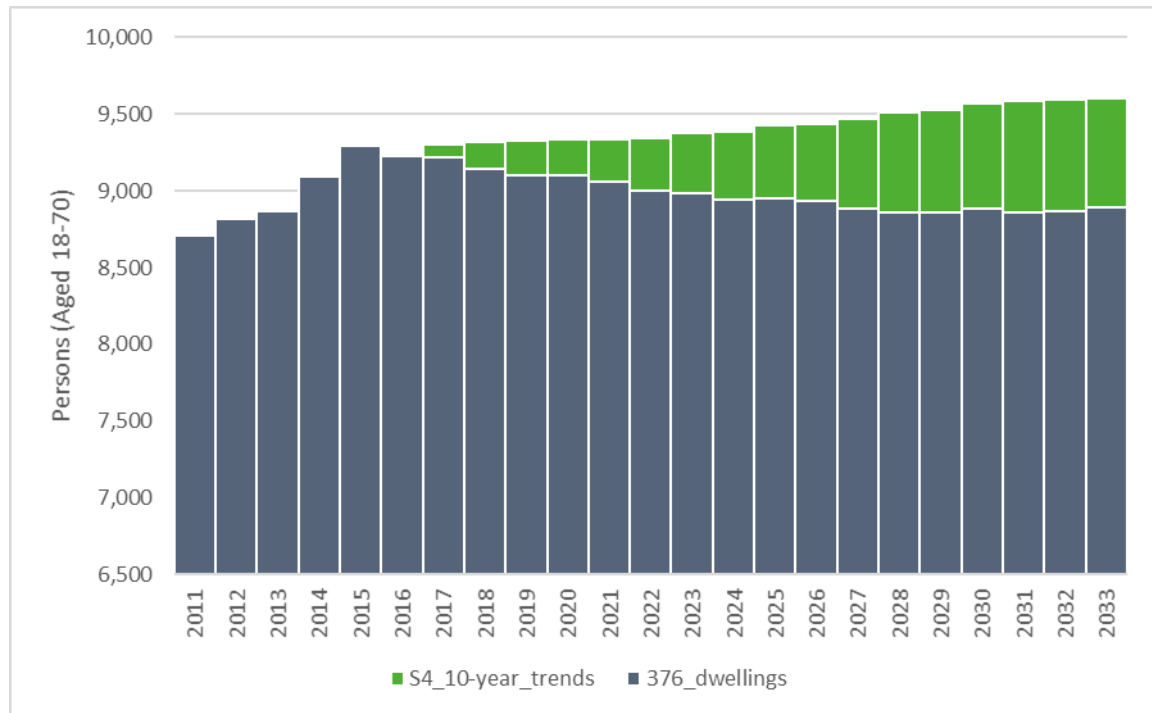


**Graphic 6.4: Chigwell Population Change Trend and Projection (Chigwell S4 Scenario)**



6.14 As illustrated within Graphic 6.5 below, by constraining housing growth to only 376 dwellings over the LP period would result in a decline in working age residents. A shift towards a declining working age population could undermine the vitality of Chigwell, particularly over the longer time-period. However, under the unconstrained demographic-based scenario (Chigwell S4) working age population change increases in line with long term trends. The communities existing balanced population structure would remain.

**Graphic 6.5: Chigwell Projected Working Age Population Change: 376 dwellings and Chigwell S4 Scenarios**



- 6.15 As previously referred, evidence presented within the SHMA is demonstrably clear that a 20% uplift from the demographic starting point housing figure is wholly justified to help address worsening market signals. With the application of a 20% market signals uplift the Chigwell S4 demographic-led housing figure increases from 1,287 dwellings (59 dpa) to 1,544 dwellings (70 dpa) over the LP period.
  
- 6.16 In light of the above, we conclude that the most appropriate level of housing growth at Chigwell over the LP period is **1,544 dwellings (70 dpa)**. This level of housing growth aligns with the settlement long-term growth trends; will maintain a balanced and mixed demographic structure; will assist with helping to address worsening market signals; and will maintain Chigwell’s role within the District’s settlement hierarchy.