

7



**Epping Forest
District Council**
www.eppingforestdc.gov.uk



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

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 / Agent :**3. Agent's Details (if applicable)/on behalf of :**

Title	Mr	Mr	Mr
First Name	Mike	David	Tom
Last Name	Newton	Lewis	Thornewill
Job Title (where relevant)			Hallam Land Management Ltd
Organisation (where relevant)	Boyer	CEG	
Address Line 1	Crowthorne House	Sloan Square House	10 Duncan Close
Line 2	Nine Mile Ride	1 Holbein Place	Moulton Park
Line 3	Wokingham	London	Northampton
Line 4	Berkshire		
Post Code	RG40 3GZ	SW1W 8NS	NN3 6WL
Telephone Number	01344 753 225		
E-mail Address	mikenewton@ boyerplanning.co.uk		

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

**Policy SP2 - Housing Need

Site Reference Settlement *Please see attached sheet

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 *Please see attached sheet

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 sheet.

(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 sheet.

(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:

In order to provide further information to assist the Inspector in assessing the soundness of the Plan and to inform a decision as to any necessary modifications to achieve this purpose.

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

Signature:



Date:



POLICY SP2 - Housing Need and Supply

- 1 It is well established that Local Plans should first establish Objectively Assessed Need (OAN) for housing and then, as a separate process, determine the extent to which that need can be met, consistent with the policies set out within the NPPF. Paragraph 47 of the NPPF is clear that the aim should be to meet the full OAN as far as is consistent with the NPPF policies.
- 2 As with the Regulation 18 Draft Local Plan however, there is no clear separation in the Pre-Submission Local Plan between the OAN and the Authorities' capability to meet it. In the interests of soundness they should be dealt with under separate headings, for both the HMA as a whole and for Epping Forest in particular. We consider these two processes below.

Objectively Assessed Need (OAN)

- 3 Epping Forest District lies within the West Essex and East Hertfordshire Housing Market Area (HMA) along with Harlow, East Hertfordshire and Uttlesford District Councils. The original Strategic Housing Market Assessment (SHMA) was published in 2015 and identified a need for 46,100 homes across the HMA. The individual OAN for Epping Forest was identified as 11,300 new homes over the Local Plan period (2011-2033).
- 4 Since the completion of the 2015 SHMA, revised household and population projections have been published, the most recent being:
 - CLG 2014-based household projections, published in July 2016;
 - ONS population estimates up to mid-2016, the most recent data published in June 2017; and
 - Greater London Authority (GLA) 2016-based household projections, published in July 2017.
- 5 The SHMA consultants, Opinion Research Services (ORS), have estimated that the revised household and population projections above results in an increase in OAN to 51,700 for the combined HMA authorities, an increase of some 5,600 homes. Their resulting report: 'West Essex and East Hertfordshire Strategic Housing Market Assessment: Establishing the Full Objectively Assessed Need' (July 2017), also estimates that the OAN for Epping Forest District increases to 12,573 dwellings (572dpa), as accepted in paragraph 2.43 of the Plan.
- 6 The Pre-Submission Plan, as with the previous Regulation 18 Draft Local Plan, proposes a constrained housing target of 11,400 homes, representing a shortfall of some 1,173 homes compared to its OAN, as discussed further below.
- 7 In September 2017 the Government released its consultation on the long awaited standardised methodology for calculating housing need. The idea of a standardised methodology was first suggested by the Local Plans Expert Group in early 2016. It was supported by the Government in the Housing White Paper 'Fixing our Broken Housing Market' in February 2017.
- 8 The draft standard methodology, as currently proposed, would result in a substantial increase in the annual housing requirement for all four HMA authorities, as illustrated in the table below. In particular, the annual requirement for Epping Forest would increase by 351 dpa, which would equate to an additional need of 7,722 homes over the plan period compared to the OAN identified in the 2017 SHMA Update.

	SHMA Update (July 2017) (2011-2033)	Proposed Standard Methodology (2016-2026)	Difference
East Herts	836 dpa	1,111 dpa	+275 dpa
Epping Forest	572 dpa	923 dpa	+351 dpa
Harlow	337 dpa	466 dpa	+129 dpa
Uttlesford	606 dpa	740 dpa	+134 dpa
Total	2,351 dpa	3,240 dpa	+889 dpa

- 9 The Government has indicated that, if it is taken forward, the new standard methodology would apply to all Local Plans submitted for examination after 31 March 2018. Epping Forest intends to submit the Plan to the Secretary of State before this date. From a political perspective, it is the Council's clear intention to submit the Plan for examination before 31 March 2018 to avoid a potential increase in its housing requirement. However, neither the Pre-Submission Plan nor evidence base makes any reference to the standard methodology itself. The Council's position on the standard methodology from a technical perspective is therefore unknown. This should be clarified as part of the examination process. The Council may not be obliged to adopt the figures from the standardised methodology but it needs to state why it is not doing so and the technical justification for this course of action.

Capability to Meet the OAN

- 10 To assess the sustainability of strategic spatial options for meeting the overall OAN within the HMA, the four west Essex/East Hertfordshire authorities, through the Co-op Member Board, jointly commissioned a 'Spatial Optioneering' (Spatial Options) study. We understand that this is not a single report or assessment as such but rather a process with three main components, with the overall aim of testing options for distributing different levels of growth across the HMA i.e.:
- Identifying and assessing options for the spatial distribution of OAN across the authorities
 - Sustainability Appraisal of these options (carried out by AECOM)
 - A Memorandum of Understanding (MoU) between the authorities setting out a high level agreement as to how OAN should be distributed across the HMA
- 11 This approach to joint working within the Housing Market Area is supported and provides a better co-ordinated and more effective approach to plan making within the area.

- 12 The process and output from the Spatial Options Study is reported in the previous Housing Background Paper (October 2016) and signed MoU (March 2017). We understand that the Study assessed six options that represented different levels of housing growth and its spatial distribution across the HMA, based in part on the previous SHMA Update published in August 2016. This resulted in a preferred Spatial Option, which proposed that a maximum of 51,100 homes be provided within the HMA area based on the latest demographic data available at the time, the level of infrastructure constraints and environmental and policy designations. It was agreed by the authorities that 11,400 homes would be provided in Epping Forest District.
- 13 As noted in paragraph 2.56 of the Draft Local Plan however, the work that underpinned the development of the MoU distribution focussed on the housing projections set out in the 2015 SHMA which were lower than the OAN identified in the July 2017 update. The Council accepts in paragraph 2.6 of the Housing Implementation Strategy (December 2017) that the July 2017 update figure of 12,573 represents that latest OAN for the District, however it is apparent from the Pre-Submission Plan and evidence base that no work has been undertaken to update the previously agreed spatial distribution across the HMA despite an increase in OAN for three of the four authorities involved, and across the HMA as a whole, compared to the distribution previously agreed in the MoU, as illustrated in the table overleaf.
- 14 The MoU states at paragraph A4.5 of Appendix 4 that the preferred spatial option *“is based broadly upon each local authority meeting its OAN within its own boundaries”*. That is not correct however as the 51,100 dwellings agreed in the MoU (and, of these, the 11,400 dwellings proposed for Epping Forest) are below the up-to-date OAN figures of 51,710 for the HMA and 12,573 for Epping Forest (and were also below the latest OAN figures published at the time the MoU was signed). We suggest that this indicates a need to update the MoU and spatial distribution in light of the most up-to-date evidence of housing need (i.e. the July 2017 SHMA Update), to ensure the soundness of the Epping Forest Local Plan, and indeed the emerging Local Plans for all authorities within the HMA.

	Original SHMA (September 2015)	MoU distribution (March 2017)	SHMA Update (July 2017)
East Herts	12,200	18,000	18,396
Epping Forest	8,100	11,400	12,573
Harlow	2,500	9,200	7,409
Uttlesford	9,700	12,500	13,322
Total	32,500	51,100	51,710

- 15 The conclusion that the HMA as a whole and that Epping Forest in particular cannot meet their OAN is an important one, and one which we consider is not given sufficient explanation within the Plan or its evidence base, specifically the Housing Implementation Strategy (December 2017), which states that:

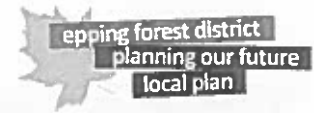
"2.6 The latest updates suggested a slightly increased OAHN for three of the four local authorities involved. However, as the increase has been largely anticipated and accounted for in the MoU, the overall housing need across the entire HMA is broadly consistent with what has been agreed in the MoU. The Council therefore accepts that the figure stated in the 2017 SHMA update represents the latest OAHN for the District, which is 12,573 new homes for the Plan period.

2.7 As stated in paragraph 47 of the NPPF, local authorities should "...ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area...". The Council is satisfied that the approach set out within the MoU will ensure that the OAHN within the HMA as a whole will be met over the course of the Plan period. As agreed and explained in the MoU, the housing requirement for the Epping Forest District Local Plan is 11,400 dwellings." (Our emphasis)

- 16 As illustrated in the table above however, the approach set out in the MoU has a shortfall of some 610 dwellings across the HMA as a whole compared to the OAN. The distribution to Epping Forest also falls 1,173 dwellings short of the District's specific OAN. It is not sufficiently clear within the Plan or evidence base why the Council is not proposing to meet this.
- 17 It is also noteworthy that East Hertfordshire District Council's Local Plan, which is currently undergoing examination, is planning for a higher number of dwellings (18,681) than the figure allocated to it under the MoU, which is also higher than the OAN identified in the 2017 SHMA Update. The figures agreed within the MoU evidently therefore do not necessarily represent the maximum level of housing development which can be accommodated by each respective authority.
- 18 We therefore consider that Epping Forest's capability to meet its OAN warrants particular further scrutiny if the Plan is to be found sound, especially as it appears to be based primarily on a cap for growth at Harlow dictated by highway capacity constraints. We consider this issue further below.



**Epping Forest
District Council**
www.eppingforestdc.gov.uk



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

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 / Agent :**3. Agent's Details (if applicable)/on behalf of :**

Title	Mr	Mr	Mr
First Name	Mike	David	Tom
Last Name	Newton	Lewis	Thornewill
Job Title (where relevant)			Hallam Land Management Ltd
Organisation (where relevant)	Boyer	CEG	
Address Line 1	Crowthorne House	Sloan Square House	10 Duncan Close
Line 2	Nine Mile Ride	1 Holbein Place	Moulton Park
Line 3	Wokingham	London	Northampton
Line 4	Berkshire		
Post Code	RG40 3GZ	SW1W 8NS	NN3 6WL
Telephone Number	01344 753 225		
E-mail Address	mikenewton@ boyerplanning.co.uk		

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

**Local Plan Vision and Objectives

Site Reference Settlement *Please see attached sheet

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 *Please see attached sheet

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 sheet.

(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 sheet.

(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:

In order to provide further information to assist the Inspector in assessing the soundness of the Plan and to inform a decision as to any necessary modifications to achieve this purpose.

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

Signature:



Date:



LOCAL PLAN VISION AND OBJECTIVES

- 1 In setting the strategic context for this Plan, emphasis is placed on the Council working with its partner authorities to deliver the vision for the London Stansted Cambridge Corridor (LSCC) Core Area. We support this principle and the key elements of the vision which we see as:
 - Complementing and supporting the economic performance of the corridor;
 - Delivering housing;
 - Capitalising on existing economic sectors and promoting growth of expanding industries;
 - Protecting and enhancing the natural environment;
 - Working with partners to invest in major infrastructure; and
 - The regeneration of existing urban areas.
- 2 We particularly welcome the emphasis given to the development and sustainable growth of Greater Harlow in the context of the LSCC Core Area vision.
- 3 We also support the Vision for the District set out on page 19 of the Plan, in particular that “significant residential development will be located around Harlow to support the economic regeneration of the town”.
- 4 We support the Local Plan Objectives on page 20 as an important set of principles to guide the specific policies and proposals of the Plan.

