



21 January 2018

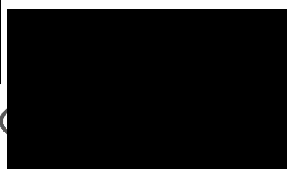
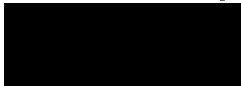
Planning Policy  
Epping Forest District Council  
Civic Offices  
323 High Street  
Epping  
Essex  
CM16 4BZ

Dear Sirs

**Epping Forest District Local Plan (regulation 19 publication)**

Please find enclosed my comments on paragraphs 2.44 and 2.49 of the Local Plan.

Yours faithfully,



Michael Young





**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.

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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**

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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*

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### 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	MR	
First Name	MICHAEL	
Last Name	YOUNG	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
E-mail Address		

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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**

SEE ATTACHED

(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.

SEE ATTACHMENT

*(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:

MY POINTS CONCERN HOUSING NEED FIGURES WHICH  
CONSTITUTE THE VERY BASIS OF THE PLAN

*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:

[Redacted Signature]

Date:

21/1/18





## **Epping Forest District Local Plan – Response to Regulation 19 Draft Plan – paragraph 2.44.**

### **1. Housing Need**

The assessment of housing need has been based on work conducted by the consultants, ORS, who produced the SHMA covering four adjoining districts which included Epping Forest. However I have considerable reservations about the calculations.

The calculations are based upon forecast produced the Office for National statistics (ONS) and the DCLG. In addition, ORS have taken into account the work carried out by the Greater London Authority (GLA) which was also based on the DCLG forecasts.

But there the similarity ends. A simple comparison between the housing need figures for the two districts of Epping Forest and Uttlesford is telling.

All the forecasts produced by the ONS, the DCLG and the GLA show a much greater housing need for Epping Forest than for Uttlesford. Over the plan period the figure for Epping Forest is between 2,000-3,000 dwellings (or 20 to 25%) greater than that for Uttlesford. Not so the figure from ORS, where the Uttlesford figure is 750 higher.

Despite repeated requests I have never received any attempt at an explanation.

Attachment 1 shows the relevant figures, including the latest government suggestions that show an even greater discrepancy.

### **2. Epping Forest District Proposals**

Although the latest ORS calculations indicate a housing need of 12,573 over the plan period the council has chosen a housing need figure of 11,400 which is based an earlier Memorandum of Understanding by the four SHMA districts. The suggested figure of 11,400 by EFDC is therefore out of date.

However, the council is actually planning for the building of 13,152 dwellings over the 22 year period with details appearing in Appendix 5 of the Plan. The latest calculations from the DCLG and GLA would indicate a figure in the range 13,000-15,000 so that the EFDC proposal is not too far out.

But this figure should not be presented as an overprovision compared to housing need. In fact, it represents a rather conservative assessment of the true figure of housing need.

### **3. An assessment of the latest ORS forecast**

In the latest forecast (Establishing the Full Objectively Assessed Need, July 2017) ORS have accepted the GLA figures of household numbers and have based their figures on the GLA total of the four districts.

But having accepted the GLA total of the four districts ORS have, quite bizarrely, not accepted the GLA individual totals for each district. Instead they have split the GLA total between the four districts on the basis of previous ORS calculations. This can have a significant effect; for example, this

resulted in the EFDC being reduced by 797 dwellings but the Uttlesford figure increasing by 2,136 dwellings.

Basing the total for the four districts on the GLA calculations would seem reasonable. But then not accepting the GLA figures for each district but splitting the total on a different basis is both illogical and nonsensical.

#### 4. A detailed analysis of the ORS forecast

There follows a more detailed analysis of the latest ORS report.

In July 2017 the consultants, ORS, issued a report (Establishing the Full Objectively Assessed Need) on housing need which takes into account the latest forecasts produced by the Greater London Authority (GLA).

As a result ORS amended the total housing need of the four SHMA districts from 54,609 to 51,710. The figures for each district were then simply, and inexplicably, reduced proportionately from the previous ORS figures with the Epping Forest figure falling from 13,278 to 12,573.

The ORS calculations start with the GLA household increase figure (central trend) for the four SHMA districts of 47,248. This is then uplifted twice. Firstly to give a dwellings figure of 49,116 and then an adjustment relating to average household sizes which produces a figure of 51,710. *(I do have reservations about these two uplifts but the differences are relatively minor and do not affect the major point).*

It should be stressed that this figure of 51,710 is based entirely on the GLA forecasts.

Having got this far ORS then look back at their previous calculation of housing need for the SHMA districts of 45,507 before the market signals uplift of 20% (this was produced in August 2016).

ORS then amend the market signals uplift to 13.631% in order to get to the revised GLA total of 51,710. This percentage is frequently referred to as being 14%. It is not, as 14% would result in a figure of 51,878. It is simply the uplift needed to get to the GLA-based figure of 51,710. It must be concluded that the figure of 51,710, which is based the GLA calculations, is being put forward as the total housing need for the four districts.

So far, so good. But it is then that difficulties arise. This concerns the numbers for the individual districts. Rather than use the GLA-based figures for each district, ORS have gone back to the figures for each district used in their August 2016 calculations (that totalled 45,507) and have uplifted each by 13.631%. The differences between the figures shown in the GLA forecasts and those being put forward by ORS are quite significant, with an increase of 797 for Epping Forest (from 12,573 to 13,370) and increases for East Herts of 762, for Harlow of 577 and a decrease for Uttlesford of 2,136. A full analysis is shown in the attached schedule (Attachment 2). The GLA figures are taken from the central forecast on the website - <https://data.london.gov.uk/dataset/2016-based-projections-national-outputs> and a summary is given in Attachment 3.

It seems incomprehensible that having used the GLA results to determine the total figure for the four districts then the GLA individual figures for each district are ignored. Instead the old ORS figures are used to determine a split between the four districts.

There would seem to be no logic in producing a total for the SHMA districts based on the GLA figures, but then ignoring the GLA split between the four districts and substituting the old ORS figures for each district.

It is inexplicable as the calculations seemed to have mixed up "apples and pears".

On the face of it this seems to be a straightforward error. I have questioned this with my own council, Uttlesford, but have never received an explanation.

## **5. Other Matters**

### **5.1 Adjustment for Household Sizes**

In their most recent calculations ORS make an adjustment for household sizes based on an argument that average household size will reduce in 2033 to 2001 levels. I cannot agree with this since a) no justification is offered for using 2001 household sizes and b) I cannot see from where the suggested household sizes in 2001 have been obtained (in fact my research suggests that the figures were higher rather than lower in 2001).

### **5.2 Market Signals**

ORS have now reduced the uplift for market signals from 20% to 13.631% and although this would seem to be a step in the right direction it is still higher than many neighbouring districts e.g.

South Cambs 10%

North Herts 10%

Central Beds 5%

Brentwood 0%

Broxbourne 0%

Milton Keynes 0%.

### **5.3 Consultants**

For almost two years I have been asking my own council in Uttlesford to employ an outside consultant to check the figures. This has never been done.

However some "outsiders" have commented on the figures which cover the calculations for all four districts and I believe that their comments are relevant.

A consultant from the Planning Advisory Service stated that "the method of apportionment between the authorities is not clear" and he could find "no explanation". He went on to comment that the most significant gap was the lack of evidence on the increased housing need identified in the latest DCLG household projections. A further narrative was essential to explain the final strategy.

A QC employed by Uttlesford district council stressed that work needed to be strengthened so that it was more explicit as to how the figures were derived.

And an Inspector from the Planning Inspectorate stressed the need for the figures to be defensible when robustly challenged at Examination. He made the point that the Spatial Options Study “didn’t show its workings, not that the conclusions were necessarily right or wrong, but the process wasn’t clear”. You simply couldn’t tell.

It needs to be stressed that none of these individuals are statisticians who have actually checked the mathematical models. They are simply individuals with experience of local plans who having taken a critical look at the reports presented are unable to find evidence to justify the results.

#### **5.4 Exceptional Growth Figures.**

It must be pointed out that the forecast growth for the SHMA area is exceptionally high. For my own district of Uttlesford this shows an increase over the plan period of 43% (now reduced to 41%) which is far higher than any of the neighbouring authorities (see attachment 4). In fact I can only find two districts in the entire country with higher growth rates of housing need and these are both in Oxfordshire. Housing growth in that county has been exceptionally low over the last 15 years and so its districts are now playing catch-up. Also one of the districts claims it is unable to absorb massive growth and is asking its neighbouring districts to share the load.

Uttlesford is the main example within the SHMA area but the figures for the other three districts are also exceptionally high.

Michael Young



January 2018

**Attachment 1**  
**Epping Forest/Uttlesford Comparison**  
**Household/Dwellings Increase 2011 to 2033**

	Epping Forest	Uttlesford	Difference
Office of National Statistics (ONS)	14,570	11,825	- 2,745
Dept. for Communities and Local Govt.(DCLG)	14,374	11,427	- 2,947
Greater London Authority (GLA)	12,216	10,230	- 1,986
Latest Govt. proposals (not approved)	20,306	16,280	- 4,026
<i>Figures above are households</i>			
ORS latest (dwellings)	12,573	13,332	759

**Notes**

1. The difference between households and dwellings is minor, typically 3% and so the figures are comparable.
2. The ONS figures are taken from the population forecasts and converted to households using the DCLG ratios.
3. The gov't. proposals are the latest suggestions. They are based on DCLG calculations but it is not known if they will become policy.



**Attachment 2  
Housing Increase 2011-2033**

	DCLG 2012 July 2014 Households	ORS SHMA Sept 2015 Dwellings	DCLG 2014 July 2016 Households	ORS Update Aug 2016 Dwellings before uplift	ORS Update Aug 2016 Dwellings	GLA Households	GLA Dwellings	GLA with uplift Dwellings	ORS Update July 2017 Dwellings
East Herts	17,139	16,400	17,243	16,189	19,427	17,505	18,197	19,158	18,396
Epping Forest	14,371	11,300	14,374	11,065	13,278	12,216	12,699	13,370	12,573
Harlow	7,163	5,900	7,653	6,520	7,824	7,297	7,586	7,986	7,409
Uttlesford	10,965	12,500	11,427	11,733	14,080	10,230	10,634	11,196	13,332
<b>TOTAL</b>	<b>49,638</b>	<b>46,100</b>	<b>50,697</b>	<b>45,507</b>	<b>54,609</b>	<b>47,248</b>	<b>49,116</b>	<b>51,710</b>	<b>51,710</b>

Note: It is possible that there may be small difference in the figures for each district in the GLA columns where I have taken the SHMA average and ORS have used individual figures (e.g. for East Herts I have used the average household to dwellings conversion of 3.95% whereas ORS may have used 3.5%). The differences will not be significant.





**Attachment 3  
GLA Households**

	2011	2033	Increase
East Herts	56,811.08	74,316.80	17,505.72
Epping Forest	52,084.38	64,300.45	12,216.07
Harlow	34,699.31	41,995.88	7,296.57
Uttlesford	31,569.33	41,799.16	10,229.83
	175,164.10	222,412.29	47,248.19



**Attachment 4**  
**Housing Growth over Plan period**  
**Uttlesford and its neighbours**

	Growth	"Updated"
	%	
Braintree	28	28
Chelmsford	25	25
East Herts	33	31
Epping Forest	24	23
Harlow	22	21
North Herts	28	28
South Cambs	35	35
<b>Uttlesford</b>	<b>43</b>	<b>41</b>



## **Epping Forest District Local Plan – Response to Regulation 19 Draft Plan – paragraph 2.49**

### **Stansted Airport**

Although the Plan does not specify a number it appears from the background papers that the housing need figure has been calculated on the basis of 8,000-10,000 extra jobs being created at the airport over the plan period. It is not clear what effect this had on the calculation of housing need.

The Stansted Sustainable Development Plan 2015 (Economy and Surface Access, page 15) predicts onsite employment to reach 18,800 at 35 mppa. In 2011 the actual number employed at the airport was 10,231 and so this would indicate an increase over the period of 8,569.

These figures are rather different to those shown in the report by the consultants, Hardisty Jones, in September 2015. They used a figure of 10,000 extra jobs which had been supplied to them by the local councils. Hardisty Jones made it very clear that they had “not assessed the validity of these growth ambitions”.

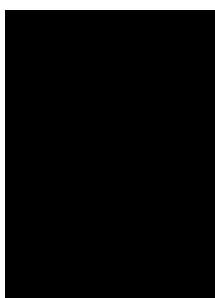
Unfortunately, it is not clear which figures have been used in the calculation of housing need or what effect they have had on that figure.

It needs to be pointed that these figures for employment growth bear no relation to past experience. In a report prepared for the London Stansted Cambridge Consortium (whose main sponsors are the airport owners and supporting businesses) it is stated that past experience shows employee numbers increasing at the rate of 290 per one million passengers (see Appendix 2 of the Oxford Economics report, “Economic Impact of Stansted Scenarios” November 2013).

In 2011 passenger numbers were 18 million and so an increase of 17 million to 35 million would at historic rates produce just under 5,000 extra jobs. But these are historic rates and do not allow for future economies. Between 2011 and 2015 onsite employment increased by 733 and passenger numbers by 4.6 million which gives an employment rate of 159 per one million passengers. This would yield only 2,700 extra jobs (say, 3,000 at most) over the plan period of 2011-33.

So it would seem that the suggested figure for extra on-site employment is vastly overstated. But, as stated above, it is impossible to know what effect making such adjustment would have the figure for housing need since it is impossible to tell what was the effect of the initial calculation.

Michael Young



January 2018

