

Representations on Epping Forest District Local Plan Submission Document (Regulation 19)

On behalf of 111 Invest Ltd.

Affordable Housing within Epping Forest District

January 2018



1. Background and overview

- 1.1 These representations on the Epping Forest Local Plan Submission Version (LPSV) are submitted by Strutt and Parker on behalf of 111 Invest Ltd, who are actively engaged in seeking to delivery homes within Epping Forest District on a number of small and medium-sized sites.
- 1.2 These representations concern Policy H2 – Affordable Housing of the LPSV.
- 1.3 We wish to raise an objection to this policy, and in particular the proposed threshold which proposes that sites of 11 or more homes or with residential floorspace of more than 1,000 sq m (combined gross internal area), will be required to provide 40% affordable housing.
- 1.4 Our concerns are that the introduction of a sudden change in threshold from 15 or more dwellings (as per Policy H6A of the current adopted Development Plan) to that proposed through Policy H2 of the LPSV will undermine the delivery of sites capable of accommodating 11-15 dwellings, which – cumulatively – have the potential to make a significant contribution to meeting housing needs, particularly in the short term.
- 1.5 We consider such concerns particularly relevant as we are of the view that the LPSV does not adequately address housing needs in the short-term. The imposition of a more onerous affordable housing threshold will impact on viability which will likely impact on short-term delivery, and it is unclear how this has been considered.
- 1.6 We suggest that rather than an immediate imposition of the proposed revised threshold, the requirement is brought in later within the plan period. Such an approach would ensure that it does not negatively impact on housing delivery in the short-term, that prospective developers have time to adjust to the new threshold, and that the viability of the schemes with the potential to come forward to meet the acute current housing shortage is not undermined.
- 1.7 Further details are set out within this representation.

2. Current housing need, short-term delivery and Policy H2

- 2.1 There is evidently an acute housing shortage in Epping District, as demonstrated by the Local Plan evidence base and the objectively assessed housing need work undertaken as part of the plan-making process.
- 2.2 Furthermore, it is clear that in recent years delivery within Epping Forest District has been considerably below need. The most recent calculation of objectively assessed housing need (2017) suggests the District requires the equivalent of approximately 572 net additional homes per year between 2011 and 2033. However, the Council's housing trajectory (as per Appendix 5 of the LPSV) confirms that between 2011 and 2017 there was a total of just 1,330 completions – an average of just 221 additional homes per year. A substantial level of unmet housing need has built up over recent years.
- 2.3 As we have noted in other representations, there are two potential approaches to address shortfall in housing land supply. The first, the 'Liverpool approach' is where the shortfall is spread across the remaining Plan period and is sought to be met over this period. The alternative, the 'Sedgefield approach', seeks to make up the shortfall within the five-year period.
- 2.4 The PPG is clear that the Sedgefield approach should be applied where possible, stating:
- "Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the 'Duty to cooperate". (PPG, Paragraph: 035 Reference ID: 3-035-20140306).
- 2.5 The Sedgefield approach is also aligned with the requirements of the NPPF and the need to boost significantly the supply of housing and address under delivery.
- 2.6 Nevertheless, the housing trajectory in Appendix 5 confirms that the LPSV proposes to adopt the Liverpool method to addressing backlog, i.e. by seeking to make up existing shortfall over the entirety of the plan period.

- 2.7 It is considered that such an approach is contrary to national policy; and justification for adoption of this method has not been provided.
- 2.8 In any case, we are concerned that even the proposed trajectory is somewhat optimistic – given the proposed strategy set out in the LPSV – and that the five-year requirement will not be delivered.
- 2.9 The trajectory in Appendix 5 shows delivery of Local Plan allocation sites from 2018/19. The Local Plan is not scheduled to be adopted until after this year, in May 2019.
- 2.10 It is clear that there is substantial reliance on sites, the delivery of which is not dependent on the adoption of the Local Plan, to make up shortfall in the immediate short-term.
- 2.11 Generally, there will be reliance on small-scale sites to contribute towards housing need in the early years of the plan period, given that large-scale strategic allocations will inevitably take time to deliver.
- 2.12 The housing trajectory in Appendix 5 of the LPSV shows a sudden and significant increase in delivery rate from 2018/19, when 696 completions are projected. In order to achieve such an increase, it is imperative that the LPSV does not discourage smaller sites capable of coming forward in the short-term from being delivered.
- 2.13 The sudden imposition of a reduced threshold for affordable housing has the potential to impact on the delivery of smaller sites in the short term, with prospective developers having previously been looking to bring forward sites predicated on the threshold in the adopted Development Plan.
- 2.14 A possible solution to this concern, and one which would ensure that the policy does not harm efforts to ensure housing development needs in full – in particular in the short-term when there is such an acute need – would be to delay the introduction of the new threshold until after the first five years of the plan period had elapsed.
- 2.15 Whilst it is acknowledged that the adoption of a new Local Plan will often result in a sudden change of the affordable housing threshold, given Epping Forest District’s circumstances vis-à-vis housing need and reliance on smaller sites for delivery in the short term, it is considered such an approach would be justified in this instance.