

## Epping Forest District Council Representations to the Draft Local Plan Consultation 2016 (Regulation 18)

Stakeholder ID	4842	Name	KEN
			McDonald2

Method	Survey
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Date	
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### Survey Response:

1. Do you agree with the overall vision that the Draft Plan sets out for Epping Forest District?

Strongly disagree

Please explain your choice in Question 1:

"The Plan is founded on the Strategic Housing Market Assessment ("SHMA"), prepared by consultants ORS. This fundamental building block which forecasts housing need and underpins Epping Forest's planning is flawed in many ways. I summarise my concerns below. . 1: The choice of a 10 year base period. . The period between 2001 and 2011 Censuses has been used as the base period for projecting forward, but this period is exceptional and not representative of long term evolution. This comment applies especially to Uttlesford, but it presumably has an impact on all four districts covered by the SHMA. . Fig 75 [page 100] shows a "demographic starting point" of 49,638 households (the "CLG projection"). This figure is reduced by 12,739 to arrive at 36,899 "baseline household projection" (a figure from para 3.77, Figure 41). The reduction of 12,739 is apparently the effect of adopting a "long-term migration trend" of 10 years (2001-2011) rather than the 5 year trend in the CLG projection. However, both of these trends include the exceptional period of house-building and occupation on four sites close to Stansted Airport - initially approved in the mid 1990s as airport-related but not actually started until the early part of the 10 year base period. . The exceptional nature of inward migration to the area during this period is apparent from Figure 29 [page 37]. . The exceptional nature of the base period 2001 - 2011 is borne out by a chart that appeared in early drafts by ORS but which was, for want of a better expression, suppressed in the final version of the SHMA. ORS gave a PowerPoint presentation to a Project Meeting on 09 September 2014. This was entitled ""Strategic Housing Market Assessment - Information for Discussion"" [Attachment KRM-1]. Slides 20 to 23 showed population movements between 1981 and 2011 for each of the four districts. East Herts and Epping Forest have a fairly straight growth line and Harlow is quite erratic, but Uttlesford's is very clear - a steady growth at much the same rate as EFDC and EHDC until 2001 and then a rapid acceleration. This period of exceptional house-building then formed the basis for Uttlesford's flawed and withdrawn 2014 Local Plan, and has been used since as the benchmark against which development approvals have been given. That exceptional period has effectively set the target for Uttlesford's house-building for the period 2011 - 2021, so Uttlesford will have two exceptional decades out of line with the longer-term historic pattern. As the SHMA is silent on the allocation of overall "need" between the four districts, I am unable to say what impact there may have been

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on Epping Forest's projections. . Over the period from 1981 to 2011, the rate of growth between censuses in Uttlesford has been 8%, 4% and then 15%. Adoption of the SHMA by Uttlesford would mean ongoing growth of 15% per decade. The effect on Epping Forest from its allocation of the overall SHMA area "need" is unclear because the SHMA has no audit trail to show how the allocation was made. . 2: Over-simplistic approach to migration. . Consideration of the drivers of migration (in and out) focuses on a theoretical, mathematical approach, but there is no evidence of considering the actual push/pull factors. . The exceptional nature of inward migration to Uttlesford is apparent from Figure 29, with a step change from previous years to the period 2005-2014. It might be assumed that this was driven by airport expansion, but I suspect much was due simply to the increased availability of houses during that time - houses approved as 'airport-related' but, in reality, largely too expensive for the majority of airport workers. . Para 3.3, Fig 25 asks "Are there any known problems with local data? Do we need to take account of any anomalies?", and this is echoed by para 3.10, "need to take account of local evidence". Yet there appears to have been no consideration of the anomalies that arose from the rapid expansion (and subsequent stagnation) in the growth of employment at Stansted Airport, specifically Uttlesford's exceptional round of "airport-related" housing approvals in the 1990s and their construction / occupation during the 10-year base period that has been used to assess future need. This is surely an anomaly that should have been explored, especially as it was drawn to Uttlesford District Council's attention by me (several times) during the last iteration of this planning process in 2014. Figure 29 illustrates how the level of inward migration into Uttlesford's rose substantially and exceptionally during the period 2005 to 2014. . Para 3.19 highlights the exceptional migration into Uttlesford during the 10 years 2001 to 2011, with a gain of 9,000, whilst the net gain for the other three districts combined was only 2,200. The special airport-related-housebuilding effect has, apparently unthinkingly, been perpetuated in the forward forecasts in Figure 29. . Paras 3.26 and 3.27 cite official cautionary advice about the use of atypical or exceptional base periods, yet there appears to have been no review of the very obvious spike in migration. . Migration between districts is a key factor in population statistics and this is considered in paras 3.32 to 3.39. Whilst the report compares several ways of measuring past migration, the report focuses on comparing overall figures but does not consider, or even mention, the area's biggest employment site, Stansted Airport. The number of passengers grew from 2 million in 1992 to 12 million at the time of the 2001 census, to 24 million in 2007 before falling back to 18 million at the time of the 2011 census. This must have had a massive impact on employment at the airport and a significant impact on net migration into the four districts. Yet it does not feature in the report's considerations or analysis of migration. . 3: Questionable rationale of the Employment Trends review. . Employment trends are considered in paras 5.32 to 5.44. It is not easy to follow the discussion, but it appears to conclude by dismissing the results of the regularly-published East of England Forecasting Model ("EEFM") in favour of a higher level of forecast jobs and a higher level of housing need. This conclusion seems to be mainly founded on a forecast by a Bristol consultancy, Hardisty Jones (para 5.36), of even greater employment need at Stansted Airport. No detailed analysis of the reason to change from EEFM is provided. . Whilst it is not stated in the SHMA, the forecast of jobs has been greatly influenced by the unquestioning adoption by Hardisty Jones and then ORS of figures from a 2014 report published by Manchester Airports Group, owners of Stansted Airport. This was confirmed in a slide presentation by the consultants at an Epping Forest Member Briefing on 21 September 2015 [Attachment KRM-2]. . The SHMA includes an assumption that Stansted will handle 35 million passengers per annum (mppa) by 2025 and 45 mppa by 2030, with airport employment rising from 9,800 in 2013 to 18,800 in 2025 and 20,000 by 2030. These assumptions arose through adopting the figures in Stansted Airport's 2015 "Sustainable Development Plan". No consideration appears to have been given to the reality, from a planning perspective, of the airport's aspirational report, or to the alternative forecast in 2006 by the then owners, BAA, that only 15,800 jobs would be needed to handle 35 million passengers, not 18,800 as projected by the new owners, MAG. . A year ago, when the airport's "Sustainable Development Plan" and the SHMA forecast of housing need were being finalised, passenger numbers were growing at 16% per annum, so the airport was undoubtedly optimistic about its future. Whilst Stansted has recently returned to its record 24mppa, achieved in 2007, the annual rate of growth has fallen steadily to around 8%. . Even if there were to be demand for 45mppa, despite BREXIT and the anticipated third runway at Heathrow, and even if expansion beyond the current cap of 35mppa were to be permitted, how realistic is the forecast of 10,000 extra jobs? The SHMA jobs forecast is 7,900 more than is included in the East of England Forecasting Model. The 7,900 is one factor used to justify the 20% uplift in

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para 5.75 and Figure 75, having converted a 'rounded' 7,800 additional workers into 5,600 additional homes in para 5.44. . The inclusion of the airport's aspirations, with no evidence of any review or consideration of alternative forecasts, or indeed any obvious statement that the originator was MAG, is highly questionable. .

4: Double-counting of Stansted Airport's influence . The Employment Trends Review, which is later used to justify a 20% Uplift, is significantly impacted by assumptions of growth at Stansted Airport. However, growth in airport-related employment and related population and housing has been a significant element of the growth in population in recent years, a growth which has been used as part of the base assumptions (see my section 1 above). It is therefore inappropriate to consider adding this element a second time. . If there is an assumption that airport-related employment will grow faster during the next 22 years than during the base 10 year period this should be declared and substantiated. Given the planning and physical cap on passenger numbers and unlikely construction of a second runway, such an assumption would seem difficult to justify. .

5: Fundamental error within the "Market Signals" review. . The Market Signals review (paras 5.45 to 5.77) is based on what appears to be a mistaken and inappropriate choice of "areas with similar demographic and economic characteristics", namely South West Essex (Basildon, Brentwood and Thurrock), Stevenage and Crawley. . It is difficult to see a fit with three of the four districts covered by the SHMA. The Index of Multiple Deprivation is quoted as a source for identifying that they had similar characteristics, yet this index reveals more contrast than similarity. The 2015 index of 327 local authorities ranks Uttlesford at number 321 (the higher the rank, the less deprived), East Herts at 312, Epping Forest at number 231 and Harlow 176. Basildon, Brentwood, Thurrock, Stevenage and Crawley rank, respectively, at 83, 283, 146, 217 and 227. . An explanation for this curious choice of comparators appears in slide 39 of the presentation by ORS to a SHMA Project Meeting on 09 September 2014 [Attachment KRM-1]. Stevenage and Crawley are listed as having ""most criteria satisfied"". However, they are clearly identified as matching such criteria ""based on Harlow"". I can understand that, but they are clearly inappropriate comparators for Uttlesford, East Herts and Epping Forest. This casts serious doubt over the relevance of the Market Signals review. . I have not considered what the implications may be of this apparently mistaken choice, but the lack of fit must throw doubt on the value of any conclusions drawn, at least for Epping Forest, East Herts and Uttlesford. . I expand upon this particular concern in section 9 below..

6: The 20% uplift from the baseline projection. . After much consideration of potential adjustments for local factors, employment trends, market signals, etc, the report concludes at paragraph 5.75 that the "Baseline projection" should simply be raised by exactly 20%. The various detailed calculations, no matter how poorly explained or evidenced, have been simply swept aside by a simple rounding-up by 20% - what appears to be an almost random number. . There appear to be two main arguments for the uplift - Market Signals and future Stansted Airport employment. I have explained above why each of these arguments is fundamentally flawed. .

7: General lack of evidence and audit trail. . There is little evidence within the SHMA of how several key figures were derived - either where they could be found in some independent source or how they had been calculated by the report's authors. This is surprising given that one of the reasons for the Inspector's rejection of Uttlesford's Local Plan in 2014 was a lack of audit trail. . Para 3.7 refers to the CLG Household Projections and quotes precise figures that lead to the 49,638 households that are the starting figure in Figure 75, but no actual source is quoted. Can the source of this figure be verified - and the calculation and underlying assumptions be reviewed or tested? The paragraph concludes that 49,638 is equivalent, for example, to 653 households per year in Epping Forest. Again, can this be tested? . Paras 3.68 to 3.75 discuss "Household Representative Rates", "HRRs", but their values are not given. Figure 41 shows the number of projected households, based on population projections and HRRs - although it is not possible from what is shown to test these calculations. Fig 41 also converts the number of households into the number of dwellings required, but without showing how this has been done. . Despite all the rhetoric in the SHMA, there are effectively very few figures that seem to matter in arriving at the Objectively Assessed Need. I have not felt comfortable with any of the figures and have generally been unable to trace the steps that lead to the conclusion that Epping Forest should build 514 dwellings per annum. . Given the significance of that final figure within Epping Forest's planning process, I find it bizarre, nay unacceptable, that there is no clear audit trail. Perhaps the planning team has seen documentation that I have not, but why is it not obviously referenced or accessible? A planning inspector might expect to be able to trace the calculations - and furthermore might expect that any reasonable person considering the proposals should also be able to follow an audit trail. . Para 5.7 explains that most of the expected growth in England is

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expected to come from net international migration equivalent to 145,000 households per annum. However, para 5.9 states that the SHMA assumes this forecast to be too low, so has raised the projected overall average household increase in England from 210,000 to 239,000 per annum. The basis for this uplift is not shown, yet it presumably influences the projections for the four districts and for Epping Forest. . Other key figures without any apparent evidence include these that appear in Fig 75: 49,638 Households - the "Demographic starting point". 12,739 "Adjustment for long-term migration trends". 38,382 Dwellings - the "Baseline household projection" 20% - the uplift from the Baseline to arrive at. . 46,058 - the "Full Objectively Assessed Need" for West Essex and East Herts. . At para 5.91 and in Figure 76, that total is restated by district council, with 11,300 allocated to Epping Forest - without explanation. . 8: The basis for the allocation to Epping Forest . The basis is not explained. . A comparison of the total dwellings allocated in Fig 76 with the number of dwellings in 2011, as shown in Fig 41, reveals a tremendous difference between the individual districts, as follows: . 2011 Dwellings (Fig 41); Dwellings need (Fig 76); Need as % of 2011 Harlow  
35,835 5,900 16.5% Epping Forest 54,540 11,300 20.7% East Herts 58,600 16,400 28.0% Uttlesford  
33,138 12,500 37.7% Total 182,113 46,100 25.3% . If there are special factors that either relatively constrain or encourage growth in individual districts those factors should be visibly and clearly applied in the overall assessment of need, whilst their impacts on individual districts should be clearly demonstrated in the allocation between districts. . As it stands, it is not at all apparent how the adjustments that are applied to the total 4-district assessment are taken into account when deriving assessments for the individual districts. Given the diversity between allocations to individual districts, this is a gross and unacceptable omission. . 9: Reliance on ORS . A meeting with ORS was called by Uttlesford's Local Plan Working Group, apparently asking ORS to respond to my challenges to the SHMA. I was not present at the presentation on 27 January 2016, nor have I seen any minutes, so I do not know what discussion took place. I was advised that a copy of my detailed critique had been sent to ORS, so I was particularly interested to see how my concerns had been addressed within their slide presentation: . •The slides seemed to answer none of the questions that I had asked. •There was still no audit trail to explain how the final figures were derived, despite the warning that this was a deficiency noted by the inspector of the last draft plan. •Slide 25 was the closest to an audit trail, yet it was a "pig's breakfast", mixing households and dwellings, and did not add up. . Slide 17 ("Market Signals: House Prices and Affordability") did not encourage confidence in the rationale used by ORS. Sources were not quoted and the thinking appeared rather shallow, with no account taken of either the Harlow influence on average prices or of the effect that the threat of Stansted expansion had on house prices for several years. ORS did not respond to my comments regarding the Stansted expansion threat effect and, if anything, they highlighted their failure to understand it. . The first point on slide 17 stated "House prices are consistently higher than England". That is certainly true and can largely be explained by the historic rural context of the mix of dwellings with a greater proportion of detached or semi-detached dwellings and fewer terraced houses and flats, and also by the influence of the proximity to London where overall average prices are much higher than the local or national average. I hope there is no legislative presumption that planning authorities should be driven by a need to undermine historic housing patterns or to equalise prices to a national average. . The second point on the slide highlighted an increase in the gap between average local house prices and those for England as a whole, citing a rise from £40K in 2001 to £80K in 2013, that is an increase of around 100% in the size of the gap. However, Office for National Statistics data shows that Lower Quartile average prices in England as a whole rose during that period from £57,000 to £126,000, an increase of 120%. Thus, the gap actually narrowed as a proportion of average price. [Attachment KRM-4]. . The third point says "Lower quartile affordability has increased from a multiplier of 6.4 in 2001 to 10.1 in 2013". I am content with this choice of dates as they are, respectively, before and after the main period of Stansted expansion threat which depressed local house prices. However, this point fails to refer to the movement during this period in the multiplier for England as a whole - it grew from around 4.0 in 2001 to around 6.4 in 2013. Thus, the change in this area has mirrored what has happened in the country as a whole. . The fourth point, that the "Situation is worse than England in absolute terms, but has also been getting worse" is highly questionable in the light of my comments regarding the third point and the following fifth point. . Their fifth point, "The ratio [of lower quartile affordability] was 35% higher than England in 2006 but is more than 55% higher in 2013" is misleading. Figures have otherwise been stated for 2001 and 2013 whilst the choice of 2006 is unfortunate, being at the height of concern regarding Stansted expansion and during the period of significant local house

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price decline (certainly in Uttlesford) relative to Essex as a whole. A more meaningful starting ratio would be for 2001 when it was about 60%, compared to 55% in 2013. Thus the ratio has not worsened between 2001 and 2013. . ORS concluded that market signals justify a 20% increase in the forecast housing need. Yet most of their supporting arguments are not valid. . Despite the challenge in my critique, there was no attempt at explanation. The opportunity came at slide 25 ("Establishing OAHN for LPAs"), but this merely threw up more questions. . Slide 25 did not add up! The split between districts of the declared total Combined Uplift of 7,000 actually totals 9,100. (Presumably due to rounding, the uplift applied to reach the overall total of 46,100 is actually 9,200). The cause of this misleading slide is that it starts with apples and finishes with pears! The total figures come from figure 75 of the SHMA, but the 'apples' at the top of the chart are the numbers of households, whilst the 'pears' at the bottom are dwellings. I cannot start to guess what bits are correct. . It is difficult to have faith in consultants who produce such a chart in response to a challenge of their evidence and audit trails. ORS merely underlined my original concerns. . Insofar as the plan is built upon the SHMA, I fear it is built on sand, not rock. I was left with the impression that, whilst the language of the slides suggested that forecasts of future need were being moderated, in reality every opportunity had been taken to push the forecast upwards. Rather than a balanced approach, it looked like one that was motivated, for whatever reason, by a desire to increase house-building. . There was little evidence in their presentation that ORS had taken any notice of my critique or attempted to answer its many questions. This begs the question as to how open-minded they may have been in developing the SHMA. .  
[http://eppingforest.consultationonline.co.uk/wp-content/uploads/sites/5/gravity\\_forms/3-fce9873862dde780a40e3cbe24771a88/2016/12/Attachment-KRM-4-Extract-from-hpssadataset15lowerquartilehousepriceforationalandsubnationalgeographies.xls](http://eppingforest.consultationonline.co.uk/wp-content/uploads/sites/5/gravity_forms/3-fce9873862dde780a40e3cbe24771a88/2016/12/Attachment-KRM-4-Extract-from-hpssadataset15lowerquartilehousepriceforationalandsubnationalgeographies.xls) "

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2. Do you agree with the overall vision that the Draft Plan sets out for Epping Forest District?

(blank)

Please explain your choice in Question 2:

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3. Do you agree with the proposals for development around Harlow?

(blank)

Please explain your choice in Question 3:

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4. Do you agree with the proposed shopping area in...

Epping?

(blank)

Buckhurst Hill?

(blank)

Loughton Broadway?

(blank)

Chipping Ongar?

(blank)

Loughton High Road?

(blank)

Waltham Abbey?

(blank)

Please explain your choice in Question 4:

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5. Do you agree with the proposals for new employment development?

(blank)

Please explain your choice in Question 5:

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6. Do you agree with the proposed sites in your area?

Epping (Draft Policy P 1):

(blank)

Please provide reasons for your view on Epping:

Loughton (Draft Policy P 2)

(blank)

Please provide reasons for your view on Loughton:

Waltham Abbey (Draft Policy P 3)

(blank)

Please provide reasons for your view on Waltham Abbey:

Chipping Ongar (Draft Policy P 4)

(blank)

Please provide reasons for your view on Chipping Ongar:

Buckhurst Hill (Draft Policy P 5)

(blank)

Please provide reasons for your view on Buckhurst Hill:

North Weald Bassett (Draft Policy P 6)

(blank)

Please provide reasons for your view on North Weald Bassett:

Chigwell (Draft Policy P 7)

(blank)

Please provide reasons for your view on North Weald Bassett:

Theydon Bois (Draft Policy P 8)

(blank)

Please provide reasons for your view on Theydon Bois:

Roydon (Draft Policy P 9)

(blank)

Please provide reasons for your view on Roydon:

Nazeing (Draft Policy P 10)

(blank)

Please provide reasons for your view on Nazeing:

Thornwood (Draft Policy P 11)

(blank)

Please provide reasons for your view on Thornwood:

Coopersale, Fyfield, High Ongar, Lower Sheering, Moreton, Sewardstonbury, Sheering, Stapleford Abbots (Draft Policy P 12)

(blank)

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Please provide reasons for your view on Coopersale, Fyfield, High Ongar, Lower Sheering, Moreton, Sewardstonbury, Sheering, Stapleford Abbots:

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7. Do you agree with the approach to infrastructure provision being proposed in the plan?

(blank)

Please explain your choice in Question 7:

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8. An Interim Sustainability Appraisal has been commissioned to support the Draft Local Plan. We would welcome any comments you may have on this.
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9. Do you wish to comment on any other policies in the Draft Local Plan?