

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

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Letter or Email Response:

A RESPONSE BY THE HOME BUILDERS FEDERATION (HBF) TO THE EPPING FOREST DISTRICT COUNCIL DRAFT LOCAL PLAN

Thank you for consulting the Home Builders Federation (HBF) on the Proposed Submission Local Plan for East Hertfordshire District Council. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational plc's, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year. We hope that these issues will be considered by the Council and we would like to register our wish to participate in the examination in public. My apologies, but I only have time to make a few, brief, observations on the emerging plan. Duty to cooperate and Strategic Planning I am aware from the East Hertfordshire District Council (EHDC) Local Plan that Epping Forest is part of an HMA that includes Harlow, East Herts, and Uttlesford. I have noted the Epping Forest Plan. It would be helpful if the Council could clarify that the objectively assessed need for the HMA will be met in full. We assume this means that any potential unmet need arising from the constrained town of Harlow will be met in full within the districts of Epping Forest and East Herts. This is implied by paragraph 3.53 and Policy SP3 but it is unclear. It is also necessary to clarify whether Uttlesford Council will be meeting its own requirement (i.e. its share of the overall OAN) in full. If it considers that it is unable to do so, then this may require increases in land supply in Epping Forest and East Herts to bridge the gap. Epping Forest, East Herts and Harlow should seek confirmation from Uttlesford as to its intentions. Objectively assessed need (OAN) Apportionment I note paragraph 3.34. This indicates that the OAN is 46,100 dwellings for the HMA for the period 2011-2033. Epping Forest's share of this is 11,300 homes. As I have commented in relation to East Herts' Local Plan, the Council should clarify if the housing requirement for Epping Forest is an apportionment based on capacity, or whether it relates in any way to the individual demographic projection for the authority. If it is an apportionment then it is hard to refer to an OAN for Epping Forest (as the draft Plan does). This is unclear from the SHMA 2015. We accept the assessment of the OAN on the basis of the HMA, but this will require all four authorities to work together closely to ensure that the OAN will be met in full. This will need to be clarified by East Herts Council as the first of the four to bring forward its plan for examination. It is important to bear in mind that a joint plan is not being prepared, and nor do we have aligned plans as such, so this issue will require careful attention. If the OAN can only be understood at the level of the HMA, then if one authority fails to accommodate the required number of homes through its plan, then it means that the other three authorities' plans are unsound since the OAN has not been met. The new OAN I also note that the HMA authorities have undertaken a more recent assessment of the OAN based on the DCLG 2014 Household Projections. According to its analysis the new assessment indicates an OAN of 54,600 homes. The authorities have reassessed

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capacity in the light of this figure, but consider that they can only accommodate 51,100 homes. East Herts Regulation 19 Local Plan does not reflect this updated information. In Figure 3.3 of the Epping Forest draft Plan the table refers to a figure of 18,000 for East Herts. However East Herts Regulation 19 Local Plan only plans for 16,390 homes. We consider that the four authorities should review their emerging plans to make provision for the new OAN of 51,100 in full (notwithstanding the concerns we have about the OAN and its long-term migration adjustment). Secondly, the authorities should apply pressures on East Herts to make it review its emerging plan to accommodate the new OAN of 54,600 homes. The OAN The HBF has deep misgivings about the OAN for the HMA. We have examined this in greater detail in our response to the East Herts Regulation 19 Local Plan consultation. In summary, we are not convinced that the four authorities have justified the use of the long-term migration trend. This severely reduces the demographic starting point compared to the DCLG projections. We are aware that other HMAs in this sub region are deploying similar assumptions. One of these - the OAN for the Luton/Central Beds HMA - is being tested at examination at the moment. Once the downward adjustment has been made for lower migration, we are concerned that even after the adjustments for concealed households, employment and market signals, the resulting figure for the HMA is still lower than the DCLG projection (46,058 compared to 49,638 - as shown in Figure 75 of the SHMA 2015). We urge the HMA authorities to reconsider their approach to the treatment of migration. The HMA's proximity to London and the Mayor of London's own migration assumptions suggests that an assumption about much lower migration is unrealistic. We note paragraph 2.42 of the draft Plan relating to the attractiveness of the district to London commuters. In view of this we consider that the DCLG projections provide a reliable starting point for the assessment of need. Even these might represent an under-estimation of future needs. We refer the Council to the TCPA paper New Estimates of Housing Requirements in England, 2012 to 2037, by Neil McDonald and Christine Whitehead, TCPA, November 2015. On page 11 they refer to the likelihood that the DCLG 2012 Household Projections may have under-estimated the net inflows to other regions, particularly the East and the South East (see page 11). It also concludes that likely changes in internal migration would lead to more pressures in the South East as more Londoners move out (page 19). Draft Policy SP2 The draft Plan will provide for 11,400 homes. This is marginally higher than the Council's share of the OAN which is 11,300 homes. We note in paragraph 3.62 that the Council claims that the slightly higher requirement compared to the apportionment of the OAN, provides flexibility. We are unconvinced that 100 additional dwellings over 22 years will do much in terms of flexibility. Greater flexibility would be provided by the four authorities planning on the basis of the DCLG projections. Figure 3.5 We note that 4,550 homes will need to be provided 'elsewhere in the district'. In Draft Policy SP2 we note that the settlements in the District will provide a total of 7,390 dwellings excluding the sites around Harlow. It will be necessary to clarify if any of the 1,173 homes built since 2011 (Figure 3.5) form part of this 7,390. We assume they do. We strongly urge the Council to make as many allocations as possible at all its settlements and not delegate too much delivery to Neighbourhood Plans (Policy SP2, part iv). This will greatly assist with housing delivery.

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