

Stakeholder Reference:  
Document Reference:

Part A

Making representation as Agent on behalf of Landowner or Land Promoter

Personal Details		Agent's Details (if applicable)
Title	Mr	
First Name	Simon	Brian
Last Name	Butler-Finbow	Flynn
Job Title (where relevant)	Planning Director	Associate
Organisation (where relevant)	Pigeon Investment Management Ltd	Carter Jonas LLP
Address		
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## Part B

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### REPRESENTATION

**To which Main Modification number and/or supporting document of the Local Plan does your representation relate to?**

MM no: 5

Supporting document reference:

**Do you consider this Main Modification and/or supporting document of the Local Plan to be:**

Legally compliant: Yes

Sound: No

If no, then which of the soundness test(s) does it fail? Justified

**Please give details of why you consider the Main Modification and/or supporting document is not legally compliant or is unsound. 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.**

Main Modification MM5 provides updated data on the amount of affordable housing that is needed during the plan period, which is that a total of 2,851 affordable dwellings are needed between 2016 and 2033. Pigeon Investment Management's comments on MM5 are relevant to representations to other Main Modifications also.

The data on affordable housing need referenced in MM5 is derived from the Strategic Housing Market Assessment Affordable Housing Update 2017. This data is now therefore several years old. Given the extended Examination process for this emerging Local Plan, and the impact this has had on housing delivery in the District since 2017, the baseline data required to establish the actual affordable housing need should now be reviewed to ensure that the full needs of the District are known and able to be met.

It is noted that as of 31st December 2020 there were 1,323 households on the Council's Housing Register, which comprises of those qualifying households with an immediate or short term need for housing. This figure does not however represent the full affordable housing need.

Notwithstanding the above comment, MM5 identifies the amount of affordable housing that is needed during the plan period. The inclusion of the explanatory table does not mean that sufficient affordable dwellings will however actually be provided.

The delivery of affordable housing in the District is currently very poor. A need for 2,851 affordable dwellings between 2016 and 2033 equates to an average of 168 affordable dwellings per annum.

The latest annual monitoring data demonstrates that there has been inadequate delivery of affordable housing in Epping District, and it has fallen well short of what is required.

Table 2 of the Annual Monitoring Report 2019-20 (EB17080) shows the affordable housing delivery in recent years as follows:

- 2013/14 – 9 dwellings;
- 2014/15 – 69;
- 2015/16 – 38;
- 2016/17 – 0;
- 2017/18 – 89;
- 2018/19 – 45;
- 2019/20 – 93;

Only 343 affordable dwellings have been provided between 2013/14 and 2019/20, compared with

an annualised average requirement for 1,176 affordable dwellings during this period; a shortfall of more than 800 affordable dwellings.

The current affordable housing shortfall and the past performance of affordable housing delivery indicates that it is likely to be very challenging to meet the affordable housing needs of Epping Forest District during the plan period. What is also clear is that a very significant uplift in the delivery of affordable housing is required if this trend of under delivery is to be addressed.

The Main Modifications that have now been published will have a significant adverse impact on the delivery of affordable housing within the District. For example, Main Modification MM15 seeks to introduce a stepped housing trajectory that would reduce the delivery of housing and affordable housing during the early years of the remainder of the plan period. Main Modification MM115 amends the housing trajectory so that the strategic allocations on the edge of Harlow and at Epping South (significant contributors to the planned delivery of housing) will now be delivered later in the plan period with associated delays to the delivery of affordable housing. Other Main Modifications also reduce the total quantum of new homes to be delivered through allocations, removing nearly all of what was already a relatively modest buffer in the housing trajectory. With much of the district falling within the Green Belt, the reduction in allocated sites reduces the opportunity to deliver affordable housing and also increases the risk of under delivery.

The Main Modifications therefore presented have failed to demonstrate that the identified affordable housing need remains up to date and accurate. The data that is however available confirms that the delivery of affordable housing has fallen well below the need identified in 2017. The significant and urgent need for new affordable housing has not been addressed so far during the Plan period with the shortfall in delivery of much needed affordable homes increasing rather than decreasing. Many of the Main Modifications now published have the effect of delaying the delivery of new affordable housing with a significant proportion of the affordable homes that are required now being unlikely to be delivered until the end of the Plan period. These Main Modifications therefore:

- Fail to prioritise the delivery of affordable housing;
- At best will delay the delivery of much needed affordable housing for several years
- Increase the risk of the full affordable needs of the District not being met during the plan period.

**Please set out what change(s) you consider necessary to make the Main Modification and/or supporting document 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.**

Pigeon would therefore request that the supporting data used to identify the affordable housing need be reviewed and updated. When considering the soundness of other Main Modifications it also requested that the proposed alterations to the Submitted Plan be reviewed in the context of the delivery of affordable housing.

Signature: Carter Jonas LLP Date:  
23/09/2021