

Introduction

1. The purpose of this note is to identify issues relating to housing set out in Chapter 3, The Development Strategy of the Plan and to seek further information from the Council about their approach. For avoidance of doubt the note relates to the submitted version, titled East Herts District Plan pre-submission consultation 2016 (document reference SUB/001) (EHDP).

Housing requirement and objectively assessed need

2. The EHDP indicates that the combined level of housing need across the Market Housing Area (encompassing East Herts, Harlow, Uttlesford and Epping Forest) is 46,058 homes for the period 2011-2033. For East Herts, the Plan indicates that the level of need is 16,390 by 2033, 745 new homes per year.
3. The figures use as their starting point the Department of Communities and Local Government (CLG) household projections of 2012 to define objectively assessed need (OAN), upon which their housing requirement is based. However, on 12 July 2016 the Department of Communities and Local Government published its 2014 household projections, updating the 2012 data. The 2014-based projections take into account the Office of National Statistics (ONS) 2014-based sub-national population projections published on 25th May 2016.
4. The EHDP acknowledges that the most recent (2014) projections are relevant and these show an increase in likely population and households. The Plan indicates that this could lead to a requirement of around 19,500 new dwellings during the plan period. However, instead of basing the EHDC housing requirement on the updated and most recent figures, the Plan maintains the lower figure of 16,390 new dwellings and proposes to deal with the increase by way of an early review.
5. The National Planning Policy Framework (NPPF) indicates that to boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed need. Planning Policy Guidance advises that household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need. In maintaining the lower requirement and seeking a review, the EHDP would not, therefore, be adopting an approach to OAN and the housing requirement that is consistent with national policy.
6. To remedy this, and since submitting the EHDC for examination, I am advised that the Council are undertaking further work on their OAN and subsequent housing requirement correctly using the 2014 projections as the starting point. I assume this work is in addition to work already

undertaken in the background document 'Updating the Overall Housing Need-based on 2014 projections for West Essex and East Hertfordshire' (reference HOP/011).

7. I would therefore like to establish the following points:
 - a) The exact nature of the work on housing being undertaken by the Council in the updated housing studies,
 - b) Will it address the Housing Market Area as a whole and require a further Memorandum of Understanding between the Market Area Authorities?
 - c) Whether it will set out the Council's position on migration and unmet need from London?
 - d) Whether the Council are likely to suggest modifications to the housing requirement policies and any other relevant policies in the EHDC based on their findings,
 - e) A detailed timetable for submission of the updated housing study and suggested modifications,
 - f) The Council's views on how consultation should take place if modifications are suggested to housing policies.
8. It would be helpful if the Council could ensure that the proposed changes to household projections set out in the ONS consultation document (and referred to in the Council document reference HOP/012) are not applied to the Council's OAN, as it is too early in the process to rely on the suggested changes.

Housing supply and the spatial strategy

9. The development strategy shows that housing sites are proposed around Stevenage, Welwyn Garden City and Harlow, settlements which are outside the District. It would be helpful to know what stage the strategic plans are at for each of these areas and how the sites fit into their spatial strategy? Can the Council demonstrate that these sites are the best and most sustainable options to meet the housing requirement?
10. Given the extent of the Green Belt (GB) in the Borough, can the Council point to the evidence which demonstrates that more housing should not be located outside of the GB? What options were tested in terms of a greater number outside of the GB?
11. Policy DPS3 sets out that the total housing supply 2011 – 2013 is anticipated to be 18,040 (1,650 above the 16,390 figure). If the

aforementioned further work on housing undertaken by the Council suggests that the supply should increase and further sites are needed, it will be up to the Council to identify these and I will not be assessing each omission site in this regard.

12. An updated position statement on the delivery of infrastructure should be provided alongside any updated housing study as this is fundamental to the delivery of the planned growth.

Five Year Housing Land Supply

13. This should be revisited as part of the Council's on-going housing work. In accordance with the NPPF the Council must demonstrate that they have a 5 year housing land supply. It must be robust and supported by evidence including a realistic prospect of delivery of sites (including commitments). I would like to see evidence of delivery rates (to establish the buffer) for a longer period than from 2011. Can I have details of delivery for the past 15 years as the NPPF indicates it must be persistent under delivery to warrant a 20% buffer? What evidence is there that Neighbourhood Plans will deliver any housing in the villages during the next 5 years? Could the approach to development in the villages lead to double counting with elements of the windfall allowance for the wider 2017-2027 period (i.e. In the future, will what would have come as forward as Windfalls in villages come forward as allocations in instead)?

The comments in this note are restricted to housing issues set out in the Development Strategy chapter of the EHDP and in particular the work being undertaken by the Council. It is likely that further notes will follow on other matters in due course.

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Inspector

16th May, 2017