

Select Committee Agenda



Neighbourhoods Select Committee Tuesday, 21st November, 2017

You are invited to attend the next meeting of **Neighbourhoods Select Committee**, which will be held at:

**Committee Room 1, Civic Offices, High Street, Epping
on Tuesday, 21st November, 2017
at 7.30 pm .**

**Glen Chipp
Chief Executive**

**Democratic Services
Officer**

V. Messenger
Tel: (01992) 564243 Email:
democraticservices@eppingforestdc.gov.uk

Members:

Councillors N Bedford (Chairman), H Brady (Vice-Chairman), N Avey, R Baldwin, L Hughes, J Jennings, R Morgan, S Neville, A Patel, C P Pond, B Rolfe, M Sartin, G Shiell, E Webster and J H Whitehouse

SUBSTITUTE NOMINATION DEADLINE:

6.30 pm

1. APOLOGIES FOR ABSENCE

2. SUBSTITUTE MEMBERS (COUNCIL MINUTE 39 - 23.7.02)

(Director of Governance) To report the appointment of any substitute members for the meeting.

3. NOTES OF PREVIOUS MEETING (Pages 5 - 12)

To agree the notes of the meeting of the Select Committee held on 19 September 2017.

4. DECLARATIONS OF INTEREST

(Director of Governance). To declare interests in any items on the agenda.

In considering whether to declare a pecuniary or a non-pecuniary interest under the

Code of Conduct, Overview & Scrutiny members are asked pay particular attention to paragraph 9 of the Code in addition to the more familiar requirements.

This requires the declaration of a non-pecuniary interest in any matter before an OS Committee which relates to a decision of or action by another Committee or Sub Committee of the Council, a Joint Committee or Joint Sub Committee in which the Council is involved and of which the Councillor is also a member.

Paragraph 9 does not refer to Cabinet decisions or attendance at an OS meeting purely for the purpose of answering questions or providing information on such a matter.

5. TERMS OF REFERENCE AND WORK PROGRAMME (Pages 13 - 18)

(Chairman / Lead Officer) The Overview and Scrutiny Committee has agreed the Terms of Reference of this Committee. This is attached along with an ongoing work programme. Members are asked at each meeting to review both documents.

6. KEY PERFORMANCE INDICATORS 2017/18 - QUARTER 2 PERFORMANCE (Pages 19 - 32)

(Director of Neighbourhoods) To consider the attached report.

7. CORPORATE PLAN KEY ACTION PLAN 2017/18 QUARTER 2 POSITION (Pages 33 - 40)

(Director of Neighbourhoods) To consider the attached report.

8. LOCAL PLAN UPDATE (Pages 41 - 56)

(Director of Neighbourhoods) To consider the update on the current position of the Local Plan, which will include:

- (i) A verbal report will be given to the Cabinet report of 12 October 2017; and
- (ii) The response to the Government Consultation – Planning for the Right Homes in the Right Places.

9. LEISURE MANAGEMENT CONTRACT

(Director of Neighbourhoods) To report on 1st Leisure Management Contract Partnership Board meeting held on 6 November 2017.

10. REPORTS TO BE MADE TO THE NEXT MEETING OF THE OVERVIEW AND SCRUTINY COMMITTEE

To consider which reports are ready to be submitted to the Overview and Scrutiny Committee at its next meeting.

11. FUTURE MEETINGS

(Director of Neighbourhoods) To note the future meeting dates of this Committee, which are to be held on:

- 30 January 2018; and
- 20 March 2018.

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**EPHING FOREST DISTRICT COUNCIL
NOTES OF A MEETING OF NEIGHBOURHOODS SELECT COMMITTEE
HELD ON TUESDAY, 19 SEPTEMBER 2017
IN COMMITTEE ROOM 2, CIVIC OFFICES, HIGH STREET, EPPING
AT 7.30 - 8.50 PM**

Members Present: N Bedford (Chairman), H Brady (Vice-Chairman), N Avey, R Baldwin, L Hughes, J Jennings, S Neville, A Patel, C P Pond, B Rolfe, M Sartin, G Shiell, H Whitbread and J H Whitehouse

Other members present: W Breare-Hall, S Kane, J Lea and J Philip

Apologies for Absence: R Morgan and E Webster

Officers Present D Macnab (Deputy Chief Executive and Director of Neighbourhoods), A Blom-Cooper (Interim Assistant Director (Planning Policy)), K Durrani (Assistant Director (Technical Services)) and V Messenger (Democratic Services Officer)

14. SUBSTITUTE MEMBERS (COUNCIL MINUTE 39 - 23.7.02)

It was noted that Councillor H Whitbread was substituting for Councillor E Webster.

15. NOTES OF PREVIOUS MEETING

RESOLVED:

That the notes of the last meeting of the Neighbourhoods Select Committee held on 27 June 2017 be agreed.

16. DECLARATIONS OF INTEREST

There were no declarations of interest made pursuant to the Member's Code of Conduct.

17. TERMS OF REFERENCE AND WORK PROGRAMME

It was noted that the Terms of Reference were still relevant.

Regarding the review of the Work Programme, D Macnab said that the Neighbourhoods SC members could consider adding air quality to the work programme. The Council's Air Quality Officer, C Jaggard, gave a presentation on air quality in the District at the Local Councils' Liaison Committee on 11 September 2017, while Dr J Dagley, City of London Corporation, talked about the impact of local air quality on Epping Forest. C Jaggard would be happy to attend a future meeting of this SC in January 2018 and an officer from Public Health could also be invited.

Regarding monitoring of the Council's leisure contract with Places for People Leisure (PfP), the first meeting of the formal monitoring board would take place in October 2017, so this item could be brought forward and a follow-up report made afterwards. D Macnab asked members if they wanted to include this at the November meeting, to which Cllr J H Whitehouse replied this should be put into the programme.

Councillor S Neville commented that there were two items not in the work programme – land drainage officers and ECC passenger transport. D Macnab said that Councillor M Sartin had extended an invitation to Transport for London to O & S and this would include bus services in the south of the district.

Councillor A Patel asked about the Key Action Plan regarding PfP's contract and capital investment with the forthcoming works at Loughton Leisure Centre, as well as the complaints received from centre users. He was concerned whether the teething problems PfP had experienced since it had taken over the contract had been addressed, and asked about the service changes that had been made available to the public.

Agreed:

- (1) PfP Leisure – Report of the first formal monitoring board of the Council's leisure contract to be given at Neighbourhoods SC meeting on 21 November 2017.
- (2) Air Quality Officer, C Jaggard and a Public Health Officer to be invited to the Neighbourhoods SC meeting on 30 January 2018.
- (3) To invite Land Drainage officers within the Technical Services Directorate to a future meeting.

18. LOCAL PLAN UPDATE

The SC agreed to bring forward this item.

A Blom-Cooper said that this was an item where a regular progress report was made. The methodology for calculating housing need had been published by the Department for Communities and Local Government (DCLG) – Planning for the right homes in the right places: consultation proposals, 2017 and could be downloaded at this link:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/64495/5/Planning_for_Homes_consultation_document.pdf

The Forward Planning team had not had time to digest the report yet. A spreadsheet enclosed with the report indicated that for Epping Forest District Council there would be an increase in the number of houses from 514 to 923 a year, which equated to a 40 per cent increase. This was a huge concern that would need to be evaluated. The consultation started on 14 September 2017 and would run until 9 November 2017. The Council would be submitting a response, in addition to a joint response with neighbouring partner authorities, who were similarly affected. The Council had agreed to commission consultants to collate the feedback. Regarding the population and the adjustment to take account of the uplift ratio of house prices to earnings of people in the District, this must be based on salaries in the District, i.e. not London salaries even for those who worked in London. A Blom-Cooper said that she could only surmise that where salaries were higher than house prices, for example as at Oxford, these councils had received low increases. The Council needed to submit its Local Plan by 31 March 2018 and a report would be made to Cabinet at the meeting on 12 October 2017.

The good news was that the key focus for the pre-submission plan and the report detailing the findings of July 2017 were given on the website at: <http://www.efdclocalplan.org/> On site selection, the Forward Planning team was

looking at a mixture of 168 amended / new sites. The methodology and the sites being assessed were again on the website. Transport modelling of all sites was in the draft Local Plan, and included Highway measures and sustainability that needed to be put in place. The draft report on outdoor playing pitches was slightly behind but all these reports would feed into the infrastructure deliver plan.

There would be a workshop session with local councils, landowners and neighbouring authorities. All the work preparation of the Local Plan including if it was economically viable for developers and that the plan was viable were key pieces of evidence. On other work around employment, the final selection had not been done but four authorities had just been commissioned and this work would feed into the site selection list. Sustainability appraisal work would look at reasonable options and work was ongoing on this.

Habitat assessment was a key issue and the Forward Planning Team was preparing an action plan on how to mitigate this with Epping Forest, particularly air quality issues on future traffic levels and the flow of visitors to the Forest. The Council was leading the work to develop a joint strategy and an action plan, with other relevant local authorities, which would address potential adverse impacts on the integrity of Epping Forest Special Area of Conservation (SAC), as required under the Habitat Regulations Act.

The Council would liaise with Natural England on a housing implication strategy about the proposed growth from Gilston on land that could be used for sites in and around Harlow. The Council had not delivered 514 houses a year consistently since 2011. Therefore, because of this 'lower' delivery level, the Council would have to be able to show how it could make up this shortfall and demonstrate it had a 5-year housing plan. There would be meetings on this with other councils and a progress report would go to the Cabinet meeting on 12 October.

Development forum meetings had been held in June and September when updates were given on the Local Plan and Harlow – Gilston Garden Town project. Officers were also liaising with relevant landowners and ECC regarding transport infrastructure that was a key issue. At a Garden Town meeting on 18 September, a member board had been established with monthly meetings to follow. Consultants would also be appointed through the Garden Town, a key aim of which was to try and move people onto other forms of transport. A Garden Town officer had been appointed and would be based at the Civic Offices in Epping but would work across the District and with other authorities.

Councillor N Bedford asked if 11 hectares of employment areas were required, was the North Weald Police helicopter base in this allocation. A Blom-Cooper replied that this use would not be categorised as 'employment' in terms of the Local Plan.

Councillor J H Whitehouse asked if schools would be needed. A Blom-Cooper replied that only general discussions had been held with ECC on land infrastructure.

Councillor A Patel queried the Council's lack of housing stock. Councillor J Philip replied that since 2011 the Council had not been building an adequate quota and this would need to be recovered in the Local Plan providing the Council could show the availability of housing land and reasonably deliver housing stock.

Councillor M Sartin said that she had attended an exhibition on the future Garden Town and that as it comprised seven garden villages, she could not visualise how these would come together as a Garden Town. Councillor J Philip replied that the

garden villages would be developed within a garden town structure and the whole area would be assessed as an entity. This would include looking at what improvements could be made – i.e. shopping area requirements / locations and sustainable transport, to make it a good area to live. The logical idea was to continue the Garden Town into the green spaces around Harlow. Councillor M Sartin suggested two more crossings of the A414, such as another junction. Councillor J Philip said he would not speculate until the preliminary work had been done.

19. KEY PERFORMANCE INDICATORS 2017/18 - QUARTER 1 PERFORMANCE

D Macnab reported that 12 KPIs fell within the responsibility of this SC. Of these 3 were not meeting targets – NE1001 (How much non-recycled waste was collected for every household in the district?), NE1003 (What percentage of our district had unacceptable levels of litter?) and NE1013 (What percentage of all household waste was sent to be recycled or reuse?).

Councillor J H Whitehouse asked why NE1003 had not been achieved. Councillor S Neville remarked that there were unacceptable levels of litter in his ward and that bins were regularly overflowing so they had not been monitored sufficiently. Councillor W Breare-Hall was sorry to hear about this and wanted to know which bins were affected. He was disappointed with this figure and would take it up with Biffa.

Councillor N Bedford asked how was this measured. Q Durrani replied that random samples were taken by different officers and that the District was divided up. Litter bins in busier areas such as in high streets were emptied on a weekly or daily basis. He commented that when you looked at other districts, the level of litter was much lower in this District, which had to meet a very aggressive target. Biffa had achieved much but the situation should not be like this as there was an urban mix. Councillor M Sartin commended the Council for its work.

Councillor J Lea asked if this was affected by the problem that happened at amenity centres where car occupants dropped rubbish in bins. Q Durrani replied that ECC had not found a link between the increase in fly-tipping and the District, and this kind of fly-tipping would have been residual waste. D Macnab said that it was very difficult to accept as the trend on fly-tipping was already increasing, so had not changed. Councillor H Whitbread asked to what extent the Council worked with Macdonalds and other food takeaway outlets on litter. Q Durrani commented that there were new initiatives and this was a challenge with takeaways and those with a drive thru. Councillor H Brady asked if building waste / rubble was coming out of London, had London boroughs done the same as ECC by not allowing builders' waste at amenity sites. Also, regarding unscrupulous developers / builders, Nazeing and Roydon had been badly affected by fly-tippers and waste had even included asbestos. She struggled to accept that this was residential. If small builders were doing this then were all counties doing the same as ECC. Q Durrani said that waste should be disposed of responsibly. G Shiell asked if it was worth talking to Macdonalds at Hastingwood. Councillor N Bedford commented that North Weald Parish Council did have a team but it was the vehicle occupants using the drive thru that chucked the rubbish out of the window. Councillor S Neville said that every part of the waste should be biodegradable.

RESOLVED:

That the Select Committee reviewed and noted Quarter 1 Performance in relation to the key performance indicators within its areas of responsibility.

20. CORPORATE PLAN KEY ACTION PLAN 2017/18 - QUARTER 1 POSITION

D Macnab said the vast majority were on target or had been achieved. The St John's Road site was 99 per cent of the way through negotiations, the delay being related to the community benefits of the project, i.e. the cinema, which Frontier States had assured it would take up with the contractor.

Councillor N Avey commented that a delay had been caused by access to the site, whether via the High Street or St John's Road, which Epping Town Council had yet to see. D Macnab said a design and developer's brief had been produced to which interested parties had given feedback on the benefits to partners but the site access had never been specified. N Avey said he would leave Epping Town Council to respond but the original issue was around access through the Copped Hall site.

Councillor M Sartin asked about the shopping park highway works. D Macnab said these had almost been completed to allow the opening of the shopping park, but would finally be completed in mid-October. Reports from the stores that had opened was that they were trading well – TK Maxx, Hobbycraft (slightly behind but highest spend / per head of any store) and was generally encouraging.

RESOLVED:

That the progress of the first Quarter of the Corporate Plan Key Action Plan for 2017/18, in relation to its areas of responsibility was reviewed and noted by the Select Committee.

21. CORPORATE PLAN 2018 - 2023

D Macnab said the head of Transformation was D Bailey. The Corporate Plan, the Council's highest level strategic document, which would cover the period 2018 to 2023, was being reviewed and updated. The draft had been shaped from input from the Management Board, Leadership Team and Cabinet. The draft was an attempt this time to be illustrated in a diagrammatic fashion and a headline summary was given in Appendix 1. The purpose was to create a stronger council, fit for purpose and would move forward to give stronger communities. The draft vision, purpose, corporate aims and objectives were grouped under three themes: People, Place and Council. Appendix 2 (read from right to left) showed the strategic drivers, corporate aims and objectives, benefits and performance measures, and the action required for 2018–19 to enable delivery of the first year of the plan. It was anticipated that the Corporate Plan would be adopted by full Council later in the year.

Councillor G Shiell thought it was complicated and not very simple to follow. Councillor S Neville said the diagrammatic flowcharts helped to put the draft in simplistic terms. D Macnab said the Resources and Governance SCs had liked it and it was an attempt to make the plan more accessible.

Councillor J H Whitehouse asked where was the plan on how the Council was going to achieve these aims and objectives. D Macnab said that there would be an accompanying narrative. The business plans and service plans would be on the website so you could see how they were practically delivered.

Councillor A Patel said that regarding stronger communities, the Council would need a caption for mental health. He said he had represented the Council at the District Health Forum and every authority had incorporated key strategies and therefore mental health should be promoted in 1.1.2 (Promote mental and emotional

well-being). D Macnab said that within stronger communities, this could be more specific as it was implicit but not drawn out specifically and the word 'health' added into 'mental health'.

Councillor H Brady said there were no strings on the orange boxes in the flowchart, to which S Neville said that was because these were key benefits. D Macnab said the jargon was flexible and responsive to any changes in circumstance. Councillor J Philip said that the operational objectives could be measured.

Councillor J Lea asked about 1.2.1 (Redesign the Council's sheltered housing accommodation) under Stronger communities, and why the Council had allowed there to be eleven empty rooms at Abbey View in Waltham Abbey. As vacancies had not been advertised, the elderly people that lived there were worried the Council was going to shut the home. D Macnab said the Council had no intention of shutting the home but struggled to let a studio, which was not a popular size. The Council was combining studios into one bedroom flats, which were a more popular choice. Councillor J Lea asked if she could go and have a look. Councillor J Philip advised her to speak to Councillor S Stavrou, the Housing Portfolio Holder, while D Macnab also encouraged a visit to one of the Council's sheltered housing schemes.

22. CORPORATE GREEN WORKING PARTY

D Macnab said this was a standard report. Councillor S Neville said that Councillor S Kane would come onto the Corporate Green Working Party (CGWP) as the new Safer, Greener and Transport Portfolio Holder. He asked if there was any further news on the award, to which D Macnab replied the Council had no further update on the level of the award.

Councillor J H Whitehouse said the CGWP's minutes were not very informative, to which D Macnab said that in future he would ask for a proper report from officers.

Councillor S Neville queried the Green Infrastructure Board with the Council's operations, to which D Macnab replied, yes with regard to promotional activities and getting our work in order.

Councillor M Sartin asked further about the Leisure Centre emissions that were excluded from this year's report. D Macnab said yes, and that the new leisure centre building at Hillhouse, Waltham Abbey, would be more efficient from the equipment replacements being installed. The results from this refurbishment would feed through quite quickly. Loughton Leisure Centre should also have improvements made to the building.

Agreed:

Officers to provide reports for future agendas, instead of supplying the Corporate Green Working Party minutes.

23. REPORTS TO BE MADE TO THE NEXT MEETING OF THE OVERVIEW AND SCRUTINY COMMITTEE

There were no reports made for the next O & S Committee meeting.

However, Q Durrani advised that the Council's formal response on drinking water regulations and drought management plan would be published in the Council Bulletin, no 39 on 6 October 2017.

For further information see:

Defra Consultation on Drinking Water Legislation – Private and Public Supplies 2017, 22 September 2017. The consultation documents can be found on the below link:
<https://consult.defra.gov.uk/water-quality/drinking-water-regulations-2017/>

Affinity Water Drought Management Plan – Consultation 2018 - 2023

The consultation presents plans for dealing with low, moderate and extreme drought scenarios. The document can be found online at:

<https://stakeholder.affinitywater.co.uk/docs/Drought-Management-Plan-Non-Technical-Summary-August-2018.pdf>

24. FUTURE MEETINGS

It was noted that the future meetings of the Neighbourhoods SC in this municipal year would be at 7.30pm on the following dates:

- 21 November 2017;
- 30 January 2018; and
- 20 March 2018.

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NEIGHBOURHOODS SELECT COMMITTEE

TERMS OF REFERENCE – 2017/18

Title: Neighbourhoods Select Committee

Status: Select Committee

Terms of Reference:

General

1. To undertake overview and scrutiny, utilising appropriate methods and techniques, of services and functions of the Neighbourhood Directorate;
2. To consider any matter referred to the Select Committee by the Overview and Scrutiny Committee;
3. To keep under review:
 - (i) *Environmental enforcement activities;*
 - (ii) *Waste management activities; and*
 - (iii) *Leisure Management*
 - (iv) *Local Plan Scrutiny*
4. To respond to applicable consultations as appropriate;
5. To establish working groups as necessary to undertake any activity within these terms of reference;
6. To identify any matters within the services and functions of the Neighbourhoods Directorate that require in-depth scrutiny and report back to the Overview and Scrutiny Committee as necessary;

Performance Monitoring

7. To undertake performance monitoring in relation to the services and functions of the Neighbourhoods Directorate, against adopted Key Performance Indicators and identified areas of concern;

Environment

8. To monitor and keep under review the Council's progress towards the development and adoption of a corporate energy strategy / environmental policy and to receive progress reports from the Green Working Party.
9. To receive reports from the Waste Management Partnership Board in respect of the operation of and performance of the waste management contract;

Leisure

10. To monitor and keep under review leisure management matters and in particular the procurement of the Leisure Management Contract.

Chairman: Cllr. Bedford

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Neighbourhoods Select Committee (Chairman – Cllr Bedford) Work Programme 2017/18

Item	Report Deadline / Priority	Progress / Comments	Programme of Future Meetings
(1) Neighbourhoods Directorate Business Plan	June 2017	Receive briefing from each responsible PH on their business plan for the year. (COMPLETED)	27 June 2017; 19 September 2017; 21 November 2017; 30 January 2018; 20 March 2018.
	March 2018	Receive briefing from each responsible PH on their business plan for 2018-19 municipal year	
(2) KPIs 2016/17 – Outturn Review	First meeting of each municipal year	Outturn KPI performance report for 2016/17 - went to 27 June 2016 meeting (COMPLETED)	
(3) KPIs 2017/18 - Quarterly Review	Quarterly	Review of quarterly performance: Q1 in September 2017; (COMPLETED)	
		Q2 in November '17; Q3 in March '18	
(4) Corporate Plan Key Action Plan 2016/17 – Outturn Review	First meeting of each municipal year	Outturn Key Action Plan 2016/17 performance - went to 27 June 2017 meeting (COMPLETED)	
(5) Corporate Plan Key Action Plan 2017/18 – Quarterly Review	Quarterly	Review of quarterly performance: Q1 September 2017; (COMPLETED)	
		Q2 November 2017; Q3 March 2018.	
(6) To receive regular updates on the current position of the Local Plan	Update to go to each meeting	Committee to keep a watch in brief on the position of the District's Local Plan	
(7) Environmental Enforcement activity	March 2018	Annual report to Committee	

Neighbourhoods Select Committee (Chairman – Cllr Bedford) Work Programme 2017/18

Item	Report Deadline / Priority	Progress / Comments	Programme of Future Meetings
(8) To receive progress report of the Green Corporate Working Party	As appropriate. Next due January 2018	To monitor and keep under review the Council's progress towards the development and adoption of a corporate energy strategy/environmental policy. To receive Officer progress report (<u>not</u> Minutes). (Last update on current position received from meeting held on 5 September, next meeting to be held on 5 December 2017).	
(9) To receive an annual update on the Environmental Charter	June 2017	At their meeting on 28 June 2016 the Committee agreed to receive an annual update of the Council's Environmental Charter (COMPLETED)	
(10) Review of arrangements Licenced Taxi Drivers	June 2018	Item from the O&S Co-ordinating Group	
(11) Yearly Review of the Off-Street Parking Service	TBA	To review on an annual basis the off-street parking service recently taken over by EFDC from NEPP (agreed at November 2016 meeting). 1st meeting of Off-Street Car Parking Contract Partnership Board to be held on 16 November 2017.	
(12) Review of Leisure Management Contract	As appropriate. Next due March 2018	To review the Council's leisure contract with Places for People Leisure (PfP). Report of 1st Leisure Management Contract Partnership Board meeting of 6 November 2017.	

**Neighbourhoods Select Committee (Chairman – Cllr Bedford)
Work Programme 2017/18**

Item	Report Deadline / Priority	Progress / Comments	Programme of Future Meetings
(13) Emergency planning – report on Council's emergency response systems and emergency housing arrangements	March 2018	Following the Grenfell Tower Fire – to consider our procedures.	
(14) Land Drainage Officer, Technical Services Directorate	January 2018	Invitation to attend – to report on the various land drainage and flood matters with which officers are involved	
(15) Passenger Transport officers to be invited to a meeting on the District's Bus Services	January 2018	Transport for London invited to attend O & S meeting on 9 January 2018 (to include bus services in the south of the district).	
(16) Air Quality Officer	March 2018	Invitation to attend.	
(17) Public Health Officer	March 2018	Invitation to attend.	

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SCRUTINY



Report to: Neighbourhoods Select Committee

Date of meeting: 21 November 2017

Portfolio: Environment (Cllr Will Breare-Hall)

Subject: Key Performance Indicators 2017/18 – Quarter 2 Performance

Officer contact for further information: Monika Chwiedz (01992 562076)

Democratic Services Officer: Vivienne Messenger (01992 564265)

Recommendations/Decisions Required:

- (1) That the Select Committee reviews Q2 performance in relation to the Key Performance Indicators within its areas of responsibility.**

Executive Summary:

The Local Government Act 1999 requires that the Council make arrangements to secure continuous improvement in the way in which its functions and services are exercised, having regard to a combination of economy, efficiency and effectiveness.

As part of the duty to secure continuous improvement, a range of Key Performance Indicators (KPIs) relevant to the Council's services and key objectives, are adopted each year by the Finance and Performance Management Cabinet Committee. Performance against the KPIs is monitored on a quarterly basis by Management Board and Overview and Scrutiny to drive improvement in performance and ensure corrective action is taken where necessary.

Reasons for Proposed Decision:

The KPIs provide an opportunity for the Council to focus attention on how specific areas for improvement will be addressed, and how opportunities will be exploited and better outcomes delivered. It is important that relevant performance management processes are in place to review and monitor performance against the KPIs to ensure their continued achievability and relevance, and to identify proposals for appropriate corrective action in areas of slippage or under performance.

Other Options for Action:

No other options are appropriate in this respect. Failure to monitor and review KPI performance and to consider corrective action where necessary could have negative implications for judgements made about the Council's progress, and might mean that opportunities for improvement are lost.

Report:

- A range of thirty-two (32) KPIs for 2017/18 was adopted by the Finance and Performance Management Cabinet Committee in March 2017. The KPIs are important to the improvement of the Council's services and the achievement of its key objectives,

and comprise a combination of some former statutory indicators and locally determined performance measures. The aim of the KPIs is to direct improvement effort towards services and the national priorities and local challenges arising from the social, economic and environmental context of the district, that are the focus of the key objectives.

2. Progress in respect of each of the KPIs is reviewed by the relevant Portfolio Holder, Management Board, and Overview and Scrutiny at the conclusion of each quarter. This report provides an overview of all KPIs and includes in detail those indicators which fall within the areas of responsibility of the Neighbourhoods Select Committee.
3. A headline end of Q2 performance summary in respect of the KPIs falling within the Neighbourhoods Select Committee's areas of responsibility for 2017/18, together with a detailed performance report for each of these indicators, is attached at Appendix 1 to this report.

Key Performance Indicators 2017/18 – Quarter 2 Performance

4. The overall position for **all** thirty-two (32) KPIs at the end of the Quarter 2, was as follows:
 - (a) 25 (78%) indicators achieved target;
 - (b) 3 (9%) indicators did not achieve target,
 - (c) 4 (13%) indicators performed within the agreed tolerance for the indicator, and
 - (d) 26 (82%) of indicators are currently anticipated to achieve year-end target, 3 (9%) are uncertain whether they will achieve year-end target and a further 3 (9%) are anticipated not to achieve year-end target.
5. **Neighbourhoods Select Committee indicators** – Twelve (12) of the KPIs fall within the Neighbourhoods Select Committee's areas of responsibility. The overall position with regard to the achievement of target performance at Q2 for these twelve (12) indicators, was as follows:
 - (a) 10 (84%) indicators achieved target;
 - (b) 1 (8%) indicators did not achieve target, and
 - (c) 1 (8%) of these KPI's performed within the agreed tolerance for the indicator
 - (d) 9 (75%) of indicators are currently anticipated to achieve year-end target, 1 (8%) is uncertain whether it will achieve year-end target and a further 2 (17%) are anticipated not to achieve year-end target.
6. The 'amber' performance status used in the KPI report identifies indicators that have missed the agreed target for the quarter, but where performance is within an agreed tolerance or range. The KPI tolerances were agreed by Management Board when targets for the KPIs were set in March 2017, or were subsequently determined by the appropriate service directors.
7. The Select Committee is requested to review Q2 performance for the KPIs within its areas of responsibility. The full set of KPIs was also considered by the Finance and Performance Management Cabinet Committee on 16 November 2017.

Resource Implications: none for this report

Legal and Governance Implications: none for this report; however performance management of key activities is important to the achievement of value for money.

Safer, Cleaner, Greener Implications: none for this report

Consultation Undertaken: Relevant Select Committees and the Finance and Performance Management Cabinet Committee.

Background Papers: KPI submissions held by the Performance Improvement Unit.

Impact Assessments:

Risk Management: none for this report

Equality: none for this report.

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Key Performance Indicators 2017/18 – Quarter 2 Performance Report

Appendix 1

Neighbourhoods Quarterly Indicators		Q1 2017/18			Q2 2017/18			Q3 2017/18			Q4 2017/18			Is year-end target likely to be achieved?
		Target	Value	Status	Target	Value	Status	Target	Value	Status	Target	Value	Status	
NEI001	How much non-recycled waste was collected for every household in the district?	95	105		196	205		296			400			No
NEI003	What percentage of our district had unacceptable levels of litter?	8%	10.97%		8%	6%		8%			8%			Uncertain
NEI004	What percentage of our district had unacceptable levels of detritus (dust, mud, stones, rotted leaves, glass, plastic etc.)?	10%	4.83%		10%	5.1%		10%			10%			Yes
NEI005	What percentage of the issues and complaints received by the Environment & Neighbourhoods Team received an initial response within 3 days?	95.5%	98.19%		95.5%	97.77%		95.5%			95.5%			Yes
NEI006	What percentage of the recorded incidences of fly-tipping are investigated within 3 working days of being recorded?	90%	98.72%		90%	98.5%		90%			90%			Yes
NEI007	What percentage of recorded incidences of fly-tipping (contract cleared) are removed within 5	90%	92.77%		90%	93.99%		90%			90%			Yes

Neighbourhoods Quarterly Indicators	Q1 2017/18			Q2 2017/18			Q3 2017/18			Q4 2017/18			Is year-end target likely to be achieved?
	Target	Value	Status	Target	Value	Status	Target	Value	Status	Target	Value	Status	
working days of being recorded?													
NEI008 What percentage of the recorded incidences of fly-tipping (variation order/non contract) are removed within 10 working days of being recorded?	90%	94.74%	✓	90%	93.76%	✓	90%			90%			Yes
NEI009 What percentage of out of hours (OOH) noise complaints are responded to within 15 minutes?	90%	90.4%	✓	90%	92.28%	✓	90%			90%			Yes
NEI011 What percentage of the rent we were due to be paid for our commercial premises was not paid?	2%	1.51%	✓	2%	1.31%	✓	2%			2%			Yes
NEI012 What percentage of our commercial premises was let to tenants?	98%	98.9%	✓	98%	98.9%	✓	98%			98%			Yes
NEI013 What percentage of all household waste was sent to be recycled or reuse?	26%	23.75%	✗	26%	23.74%	✗	26%			26%			No
NEI014 What percentage of all household waste was sent to be composted or anerobic digestion?	33%	35.81%	✓	33%	36.12%	✓	33%			33%			Yes

Key Performance Indicators 2017/18 Quarter 2 Performance

Report Author: Monika Chwiedz (Performance Improvement Officer)

Reflecting on our performance:

There are 32 KPIs for this year

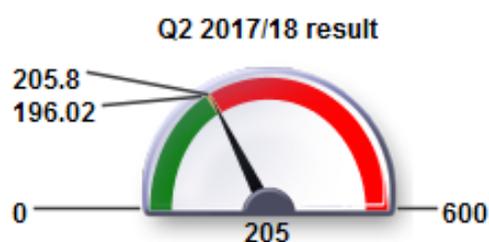
25 (78%) achieved target and 3 (9%) missed target and 4 (13%) performed within their amber tolerance.

Twelve (12) of the Key Performance Indicators fall within the Neighbourhoods Directorate.

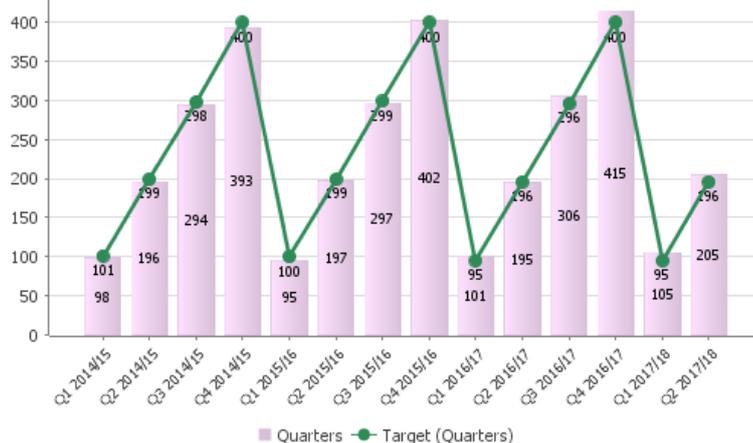
How much non-recycled waste was collected for every household in the

 **NEI001** district?

This indicator supports reductions in the amount of residual waste collected, through less overall waste and more reuse, recycling and composting. Quarterly targets and performance details for this indicator are measured in kilograms per household, and represent the cumulative total for the year to date.



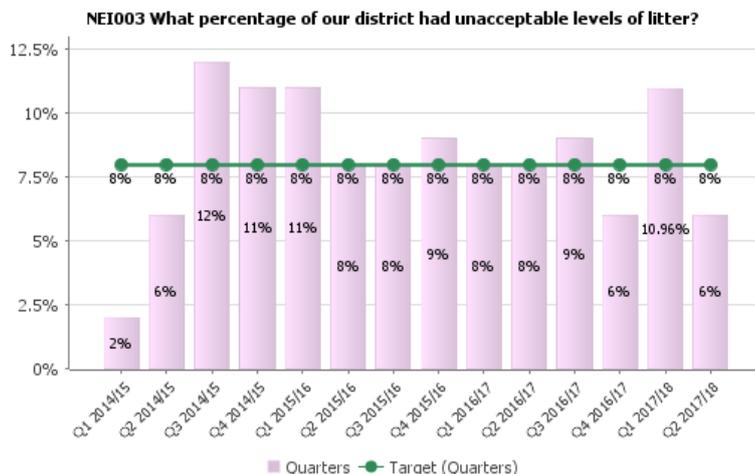
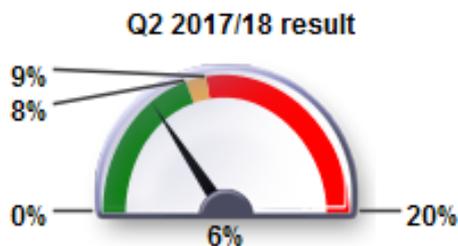
NEI001 How much non-recycled waste was collected for every household in the district?



Comment on current performance : This has not been achieved due to the overall increase in waste not only in this authority. Discussions are taking place about raising the target level.

NEI003 What percentage of our district had unacceptable levels of litter?

This indicator seeks to reduce unacceptable levels of litter. Performance is based on surveys of prescribed sites carried out over four quarterly periods each year, and represents the percentage of relevant land with deposits of litter which exceed the acceptable level.

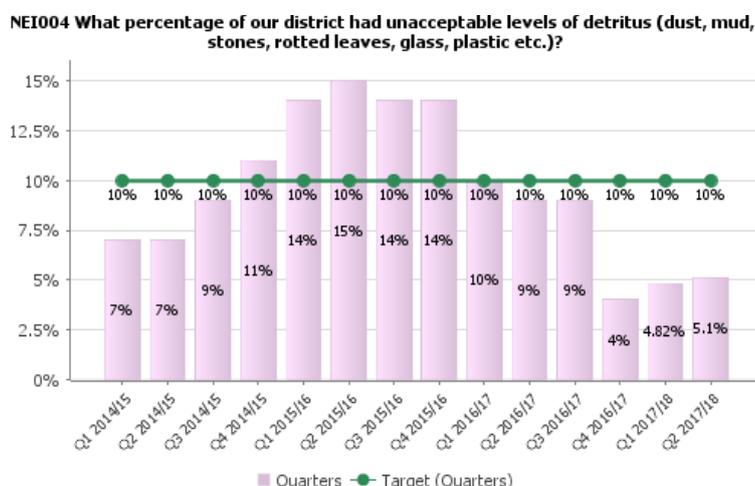
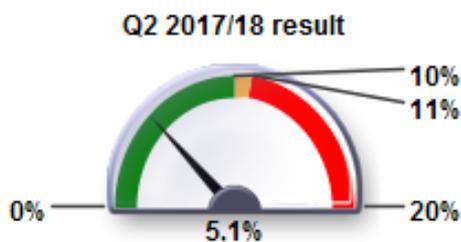


Comment on current performance ; Target met

What percentage of our district had unacceptable levels of detritus (dust, mud, stones, rotted leaves, glass, plastic etc.)?

NEI004

This indicator seeks to reduce unacceptable levels of detritus. Performance is based on surveys of prescribed sites carried out over the four quarterly periods each year, and represents the percentage of relevant land with deposits of detritus which exceed the acceptable level.

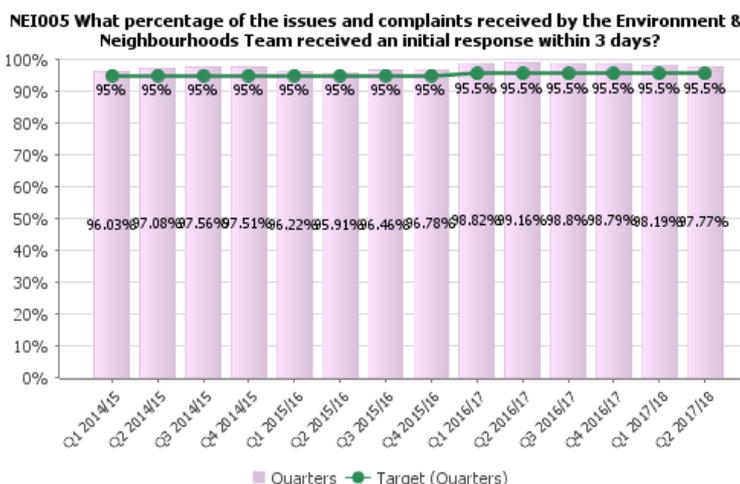


Comment on current performance ; Target achieved

What percentage of the issues and complaints received by the Environment & Neighbourhoods Team received an initial response within 3 days?



Dealing with 'enviro-crime' is a key element of the 'Safer, Cleaner, Greener' initiative, and this indicator measures the percentage of issues raised and complaints received by the Environment and Neighbourhoods Team that are responded to within three working days.

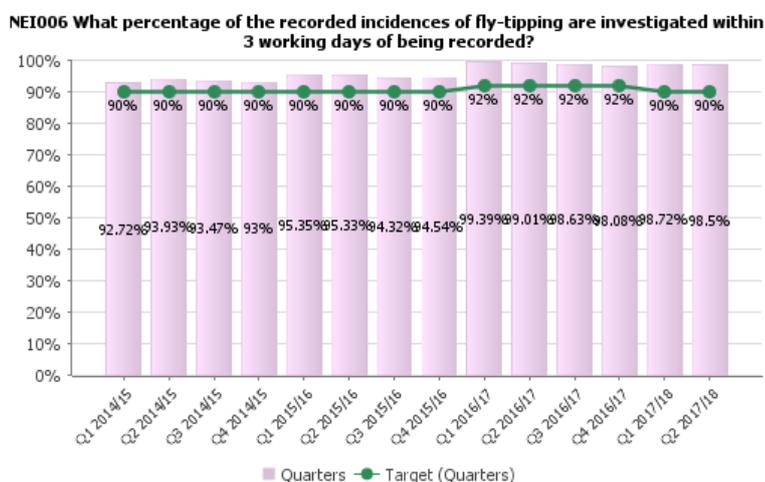
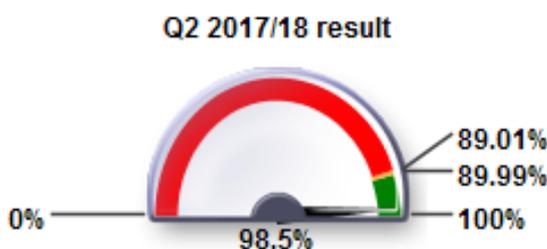


Comment on current performance : Target achieved. 2679 out of 2740 issues/complaints achieved the target.

What percentage of the recorded incidences of fly-tipping are investigated within 3 working days of being recorded?



The Team register all fly-tipping incidents reported or found on public and private land in the district. Incidents that may have evidence that can lead to the source of the waste are investigated, subject to resources and priorities at that time. Clearance is delayed until investigated (unless there are other factors that require the waste to be cleared immediately).



Comment on current performance : Target Achieved 131 out of 133 investigations achieved the target

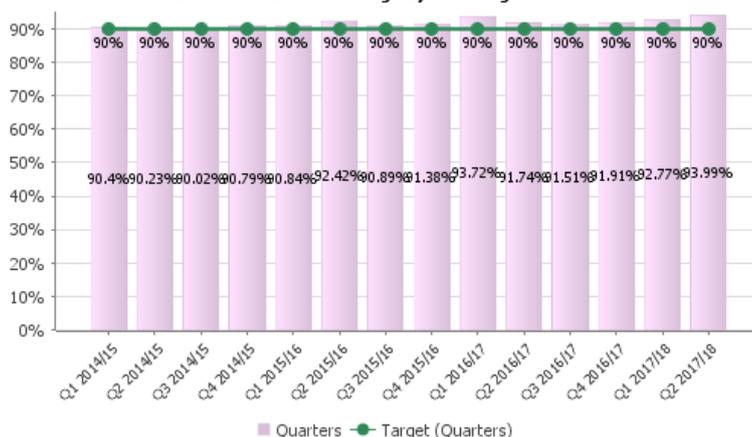
What percentage of recorded incidences of fly-tipping (contract cleared) are removed within 5 working days of being recorded?



NEI007 This indicator specifically considers fly-tip incidents which occur on land which the council is responsible for clearing and which can be cleared under the existing waste contract.



NEI007 What percentage of recorded incidences of fly-tipping (contract cleared) are removed within 5 working days of being recorded?



Comment on current performance: Target achieved for 485 out of 516 incidents

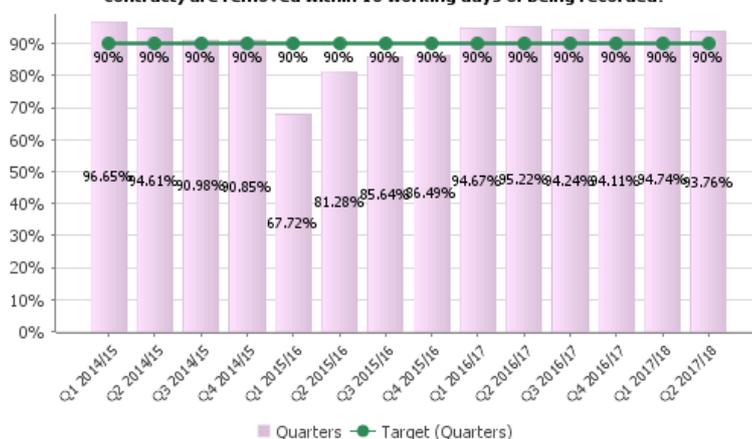
What percentage of the recorded incidences of fly-tipping (variation order/non contract) are removed within 10 working days of being recorded?



NEI008 This indicator specifically considers fly-tip incidents which occur on land which the council is responsible for clearing and which require an additional variation order or other non-contract clearance.



NEI008 What percentage of the recorded incidences of fly-tipping (variation order/non contract) are removed within 10 working days of being recorded?



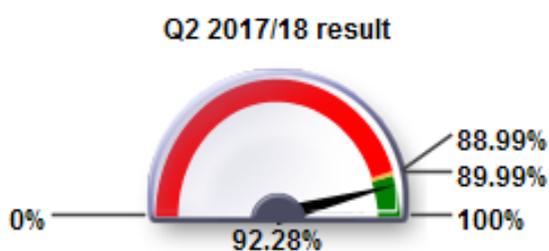
Comment on current performance: Target achieved for 451 incidents out of 481.

What percentage of out of hours (OOH) noise complaints are responded to within 15 minutes?



NEI009

The callout service for noise complaints is 24 hours (restricted emergency service after 00:00 and before 13:00 at the weekend). Calls are recorded by the Council's stand-by officer and passed to the duty noise officer who telephones the complainant. A response has been made when the duty noise officer has telephoned the complainant.



NEI009 What percentage of out of hours (OOH) noise complaints are responded to within 15 minutes?



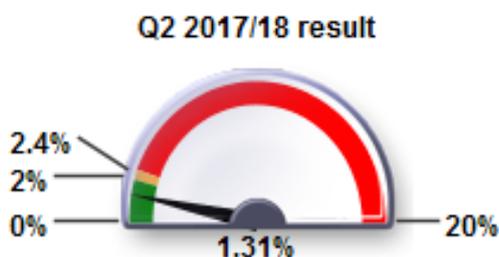
Comment on current performance: Target achieved 227 out of 246 complaints OOH responded to within 15 minutes.

What percentage of the rent we were due to be paid for our commercial premises was not paid?

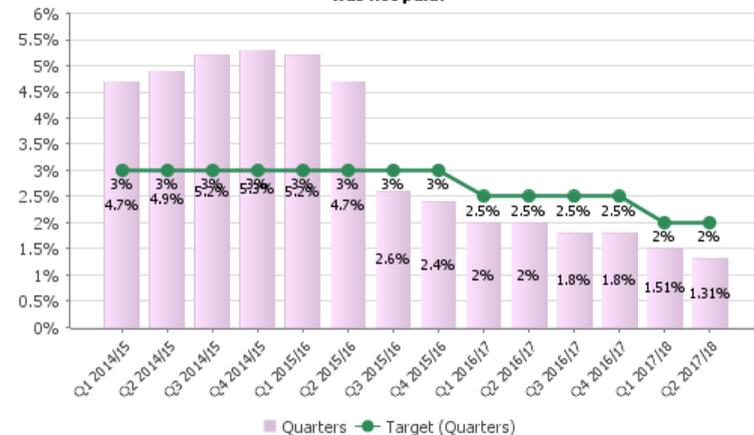


NEI011

This indicator is a measure of a local authority's rent collection and arrears recovery service for its property portfolio and assists in monitoring the collection of important income to the Council. Performance against this indicator is reported on a quarterly basis.



NEI011 What percentage of the rent we were due to be paid for our commercial premises was not paid?

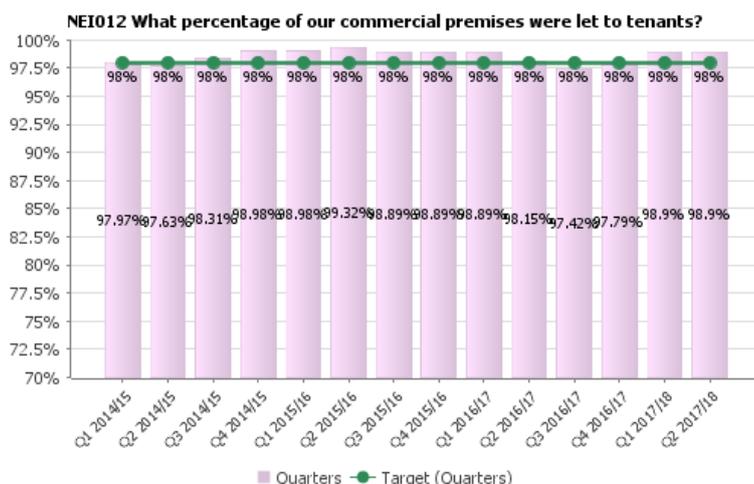


Comments on current performance: target exceeded mainly due to significant rental income uplift as a result of re-gearing leases at Brooker/Cartersfield Road, Waltham Abbey (Glyn Hopkin) and at David Lloyd, Chigwell. Improved performance also resulting from full implementation of Propman system, more pro-

active arrears management and legal action for persistent non-payers. Continue with pro-active arrears management and timely issuing of invoices and reminders.

NEI012 What percentage of our commercial premises were let to tenants?

This indicator monitors the effectiveness of the local authority's asset management function and helps to monitor the vitality of the Council's commercial and industrial portfolio. Performance against this indicator is reported on a quarterly basis.



Comments on current performance: performance improved for this quarter. This was due to completion of letting a vacant unit at the Broadway, Loughton and also the letting of two units in Waltham Abbey following the grant of planning permissions for changes of use.

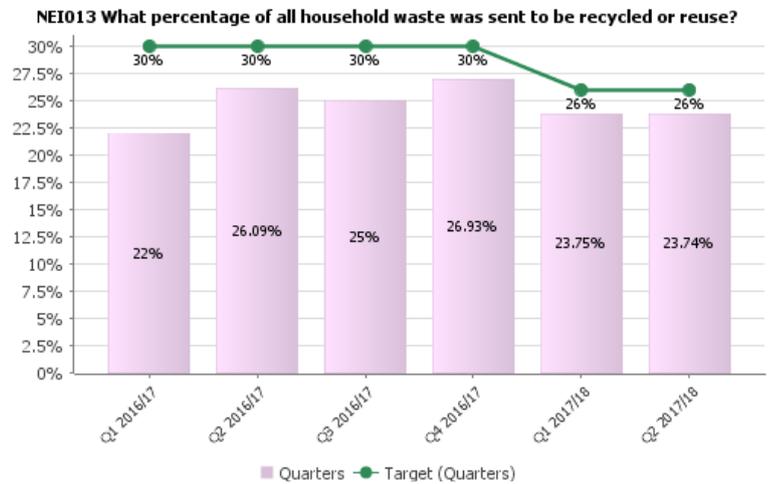
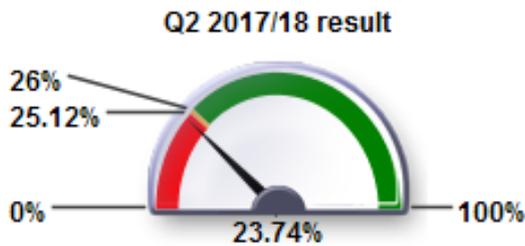
- 12 & 14 The Broadway, Debden, Loughton. Lease completed. Tenant fitting out.
- 65 The Broadway, Debden, Loughton: Santander vacated. Unit now under offer and tenant awaiting the outcome of planning application for change of use. Decision expected by end October 2017.
- 15 Market Square, Waltham Abbey – tenant found and unit is under offer in solicitors hands.

Corrective action proposed: continue to progress lettings at 65 The Broadway Loughton, monitoring planning situation with the proposed tenant and also at 15 Market Square, Waltham Abbey.



What percentage of all household waste was sent to be recycled or reuse?
NEI013

This indicator supports year on year reductions in the amount of residual waste collected, and measures the percentage of household waste arisings sent for recycling or reuse.

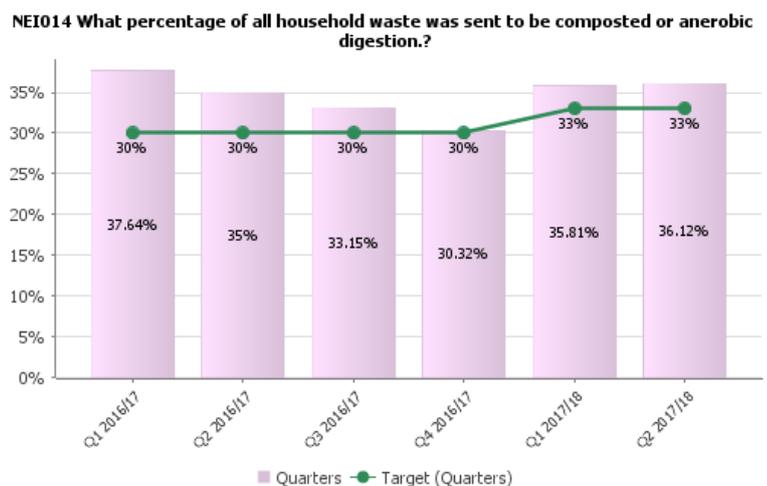
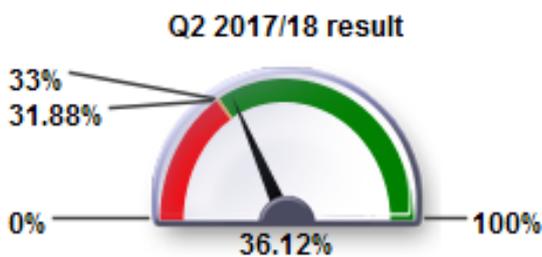


Comment on current performance: This is a new target and will be reviewed at the end of the year.



What percentage of all household waste was sent to be composted or anerobic digestion?
NEI014

This indicator supports year on year reductions in the amount of residual waste collected, and measures the percentage of household waste arisings sent for composting or anaerobic digestion.



Comment on current performance: There is a possibility that this target maybe increased next year to take account of actual tonnage collected.

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SCRUTINY



Report to: Neighbourhoods Select Committee

Date of meeting: 21 November 2017

Portfolio: Leader (Councillor C Whitbread)

Subject: Corporate Plan Key Action Plan 2017/18 – Quarter 2 progress

Officer contact for further information: Monika Chwiedz (01992 562076)

Democratic Services Officer: Vivienne Messenger (01992 564265)

Recommendations/Decisions Required:

- (1) That the Committee review the first quarter (Q2) progress of the Corporate Plan Key Action Plan for 2017/18 in relation to its areas of responsibility; and
- (2) That the Committee identifies any actions arising from the Corporate Plan Key Action Plan for 2017/18 Q2 within its areas of responsibility, which require in-depth scrutiny or further report on current progress.

Executive Summary:

The Corporate Plan is the Council's key strategic planning document, setting out its priorities over the five-year period from 2015/16 to 2019/20. The priorities or Corporate Aims are supported by Key Objectives, which provide a clear statement of the Council's overall intentions for these five years.

The Key Objectives are delivered by an annual action plan, with each year building upon the progress against the achievement of the Key Objectives for previous years. The annual action plans contain a range of actions designed to achieve specific outcomes and are working documents, which are therefore subject to change and development to ensure the actions remain relevant and appropriate, and to identify opportunities to secure further progress or improvement.

The Corporate Plan Key Action Plan for 2017/18 was adopted by Council at its meeting in September 2016. Progress in relation to all actions and deliverables is reviewed by the Cabinet, the Overview and Scrutiny Committee, and the appropriate Select Committee, on a quarterly basis.

Reasons for Proposed Decision:

It is important that relevant performance management processes are in place to review progress against the Key Objectives, to ensure their continued achievability and relevance, and to identify proposals for appropriate corrective action in areas of slippage or under-performance.

Some actions have cross directorate responsibility. Where this is the case the most appropriate Select Committee is requested to consider the action. This report presents

progress against the Key Action Plan for 2017/18 for actions most appropriately considered by the Neighbourhoods Select Committee.

Other Options for Action:

Actions with cross directorate responsibility could be considered by an alternative Select Committee, or not considered by the Select Committees.

Report:

1. The Corporate Plan 2015-2020 is the Council's highest level strategic document. It sets the strategic direction for the authority for the five year lifetime of the Plan. It focuses on a number of key areas that the Council needs to focus on during that time and helps to prioritise resources to provide quality services and value for money. These key areas are known as the Corporate Aims and are supported by a set of Key Objectives which represent the Council's high-level initiatives and over-arching goals to achieve the Corporate Aims. The Key Objectives are in turn, delivered via an annual Key Action Plan.
2. The Key Action Plan 2017/18 is populated with actions or deliverables designed to secure progress against each of the Key Objectives during 2017/18. During the subsequent years in the lifetime of the Key Objectives, annual action plans will be developed which build on progress achieved during preceding years.
3. The annual action plans are working documents, which are subject to change and development to ensure that the actions remain relevant and appropriate, and to identify opportunities to secure further progress or improvement.
4. Progress against the Key Action Plan is reviewed on a quarterly basis to ensure the timely identification and implementation of appropriate further initiatives or corrective action where necessary. Quarter 2 progress against the individual actions of the 2017/18 Key Action Plan, is as below and a schedule detailing outturn progress against the fifty (50) individual actions of the 2017/18 Key Action plan, is attached as Appendix 1 to this report. In reporting progress, the following 'status' indicators have been applied to the individual actions:

Achieved (Green) - specific deliverables or actions have been completed or achieved in accordance with in-year targets;

On-Target (Green) - specific deliverables or actions will be completed or achieved in accordance with in-year targets;

Under Control (Amber) - specific deliverables or actions have not been completed or achieved in accordance with in-year targets, but completion/achievement will be secured by a revised target date (specified) or by year-end;

Behind Schedule (Red) - specific deliverables or actions have not been completed or achieved in accordance with in-year targets and completion/achievement may not be secured by year-end; and

Pending (Grey) - specific deliverables or actions cannot currently be fully completed or achieved, as they rely on the prior completion of other actions or are dependent on external factors outside the Council's control.

5. There are fifty (50) actions **in total** for which progress updates for Q2 are as follows:
 - 41 (82%) of these actions have been 'Achieved' or are 'On Target'
 - 2 (4%) of these actions are 'Under Control'
 - 7 (14%) are 'Behind Schedule'
 - 0 (0%) are 'Pending'

Ten (10) actions fall within the areas of responsibility of the Neighbourhoods Select Committee. At the end of Q2:

- 9 (90%) of these actions have been 'Achieved' or are 'On-Target'
- 0 (0%) of these actions are 'Under Control'
- 1 (10%) of these actions are 'Behind Schedule'
- 0 (0%) of these actions are 'Pending'

6. The Committee is requested to review the Q2 progress against Key Action Plan for 2017/18 as set out in Appendix 1 of this report, and identify any actions that require more in-depth scrutiny or further progress reports.

7. This report will also be considered by the Cabinet on 7 December 2017 and the Overview and Scrutiny Committee on 9 January 2018.

Resource Implications: None for this report.

Legal and Governance Implications: None for this report. Performance monitoring contributes to the delivery of value for money.

Safer, Cleaner, Greener Implications: None for this report.

Consultation Undertaken: The performance information set out in this report has been submitted by each responsible service director.

Background Papers: Relevant documentation is held by responsible service directors.

Impact Assessments:

Risk Management: None for this report.

Equality: None for this report.

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Aim 1. To ensure that the Council has appropriate resources, on an ongoing basis, to fund its statutory duties and appropriate discretionary services whilst continuing to keep Council Tax low

Objective 1.b. To continue to review and develop the Council's own assets and landholdings for appropriate uses, in order to maximise revenue streams and capital receipts, and to deliver the following key projects:

- The Epping Forest Shopping Park, Loughton
- Council Housebuilding Programme
- St John's Redevelopment Scheme, Epping
- North Weald Airfield

Action	Lead Directorate	Target Date	.	Status	Progress notes
8. Sell the Council-owned Nursery site at Pyrles Lane, Loughton, to deliver a capital receipt	Neighbourhoods	31-Dec-2017	●	On Target	<p>Q2 – Marketing Agents appointed for Nursery Site. Hope to complete sale early in 2018. Further feasibility work commenced at Townmead with respect to building condition, flood risk and contamination to support planning application for new accommodation for relocated Nursery Service.</p> <p>Q1 - Report on the value and marketing strategy for Pyrles Lane Nursery now agreed by Cabinet, to include provision for affordable housing and a financial contribution to the redevelopment at Town Mead Depot to accommodate the Council's nursery service, which no longer can be accommodated at the new Oakwood Hill Depot.</p>
9. Deliver an approach to North Weald Airfield with an agreed operating partner, to maximise the use of the facilities	Neighbourhoods	31-Mar-2018	●	On Target	<p>Q2 – Employment Land allocation due to be considered as part of Regulation 19 Submission at Full Council in December 2017.</p> <p>Q1 - Awaiting results of the Local Plan Employment Land Review which will give direction to the scale and type of future uses that the Airfield could accommodate.</p>
10. Open the Epping Forest Shopping Park, to deliver local jobs and economic development	Neighbourhoods	30-Sep-2017	●	On Target	<p>Q2 – Practical Completion achieved by June 2017 and shop-fitting commenced. Four stores now trading as part of a soft-opening. Shopping Park now 85% let and final units in negotiation. S278 works now due to complete by end of October 2017. Official Park Opening planned mid-December</p>

					Q1 - Council received the building after practical completion in mid-June 2017. Tenants now fitting out with opening scheduled for late September 2017. Highways Section 278 Works to be completed by end of August 2017.
11. Develop the St John's Road site, to deliver local jobs and economic development	Neighbourhoods	31-Mar-2018		Behind Schedule	Q2 – Completion still to be achieved on the signing of the Tripartite Agreement. Delay largely due to negotiation of the final terms sought by Epping Town Council. Q1 - Negotiations completed on Tri-Partite Agreement with Town Council and Frontier Estates. In hands of Legal Representatives for final sign off end July 2017.

Objective 1.c. To explore appropriate opportunities to make savings and increase income through the shared delivery of services with other organisations, where such arrangements would provide improved and/or more cost effective outcomes

Action	Lead Directorate	Target Date	.	Status	Progress notes
4. Complete a new off-street parking contract to manage the Council's car parks with an alternative provider to increase efficiency and reduce costs	Neighbourhoods	01-Apr-2017		Achieved	Q2 – NSL still successfully delivering new off-street parking arrangements. Q1 - New Off-Street Contract successfully let to NSL who started their management responsibilities from 1 April 2017. Increased level of enforcement activity, particularly at weekends has been achieved.

Aim 2. To ensure that the Council has a sound and approved Local Plan and commences its subsequent delivery

Objective 2.a. To produce a sound Local Plan, following consultation with local residents and working with neighbouring councils, that meets the needs of our communities whilst minimising the impact on the District's Green Belt

Action	Lead Directorate	Target Date	.	Status	Progress notes
2. Complete the new Local Plan in accordance with the National Planning Policy	Neighbourhoods	31-Mar-2018		On Target	Q2 – Updated Local Development Scheme agreed October Cabinet. Regulation 19 Submission now scheduled for submission by the 31 March 2018, to take advantage of transitional arrangements arising from

Framework and in the timescales outlined in the adopted Local Development Scheme (LDS)					the DCLG consultation on standardised methodology for assessing housing need.
					Q1 - Results of the Regulation 18 Consultation reported to Cabinet. Key issues identified to include an analysis of Settlement Level. Local Development Scheme to be updated in October 2017.

Objective 2.b. To increase opportunities for sustainable economic development within the District, in order to increase local employment opportunities for residents

Action	Lead Directorate	Target Date	.	Status	Progress notes
1. Adoption and publication of the Local Plan Regulation 26, including site allocations for employment land and policies maps	Neighbourhoods	30-Oct-2018	●	On Target	Q2 – Work ongoing on evidence base to include the site assessment. Open Space Playing pitches and Indoor Sports Facilities completed. Transport modelling ongoing. Work commissioned on visitor study to Epping Forest by the Corporation to inform the Air Quality Action Plan.
					Q1 - Work to prepare evidence base ongoing. Workshops held with Members on Infrastructure Delivery Plan. Open Space, Playing Pitches and Indoor Sports Study commenced. Site Assessment work has started on the 160 new/amended sites arising as a result of the Regulation 18 Consultations.
3. Lead the development of Harlow and Gilston Garden Town in partnership with East Herts and Harlow Councils, to delivery housing and economic development across west Essex	Neighbourhoods	31-Mar-2018	●	On Target	Q2 – Further tranche of funding from DCLG of £175k successfully bid for and awarded. External Consultants appointed for feasibility work in relation to the North/South and East/West Sustainable Transport corridors through Harlow. Advert placed for the appointment of Project Director for the Garden Town. Joint Member Board meeting regularly.
					Q1 - Duty to Co-operate activities ongoing. Garden City Project proceeding with the commissioning of two pieces of external consultancy in relation to "Visionary" and "Governance". Work commenced on mitigation plan for the Air Quality MOU to reduce potential impacts on Epping Forest.

Objective 2.c. To deliver the Council's new Leisure and Cultural Strategy, in order to maximise participation and value for money in the provision of leisure and cultural services to local residents and visitors

Action	Lead Directorate	Target Date	.	Status	Progress notes
2. Deliver the transition of the Council's leisure facilities to a new partner through contract management	Neighbourhoods	01-Apr-2017	●	On Target	Q2 – Places for People have completed their investment of £270K in the refurbishment of the Health and Fitness Facilities at Ongar Leisure Centre. Work due to commence in October at both Epping Sports and Loughton Leisure Centres on the planned improvements to the facilities.
					Q1 - Contract with PfP successfully mobilised and management transferred to new contractor from the 1 April 2017. All staff successfully transferred under TUPE and service improvements have commenced to include major extension to Loughton Leisure Centre and reconfiguration of Health and Fitness facilities at Epping Sports Centre.
Page 80 Develop a new leisure centre in Waltham Abbey, to deliver savings and improved facilities	Neighbourhoods	30-Nov-2018	●	On Target	Q2 – Work commenced in September 2017 with site fully mobilised. Ground breaking Ceremony held in mid-October. Main pool and learner pool tanks formed. Construction on programme.
					Q1 - Detailed planning provision granted by District Development Management Committee and contractor mobilised on site to demolish existing community building. Main construction works for new Leisure Centre due to commence in September 2017 with practical completion targeted at November 2018.

Epping Forest District Council: Response to Government Consultation:

Planning for the right homes in the right places

14 September 2017 – 9 November 2017

Introduction

Epping Forest District is in the process of finalising its Pre-Submission Local Plan, which will be published under Regulation 19 of the Town and Country Planning Act (Local Planning) (England) Regulations 2012, in December 2017 and will be submitted to the Secretary of State for examination in March 2018.

Epping Forest District's Local Plan contains the requirement to deliver 11,400 new homes over the plan period 2011-2033; amounting to an average of 514 new homes per year.

The Council is submitting this representation to provide an Epping District specific response. In addition EFDC has submitted the attached response jointly with the other SHMA authorities in the West Essex/East Hertfordshire HMA (see Appendix A). EFDC intends for both of these representations to be considered as part of its response to the consultation.

EFDC's Housing Numbers

In Epping Forest District, the figure of 11,400 new homes for the period 2011-2033 amounts to an increase of almost 100% on the housing delivery targets contained within the now revoked East of England Plan of 230 per year. This is a very substantial increase in the rate of housing delivery and one which the Council is proactively planning for as part of the plan making process, which is in the advanced stages of production.

The proposed standardised methodology sets Epping Forest District's indicative housing requirement at a figure of 923 or 20,306 homes over the plan period. This would increase the District's recently assessed OAN figure by 75%. Compared with the figure in the Council's existing adopted Local Plan, this represents an increase of around 340%. This level of uplift in housing delivery is wholly unrealistic. Even if the Council were able to allocate sufficient land to accommodate this level of development, the market would not come close to delivering this level of development; the proportional increase is astronomical and wholly unachievable.

EFDC believes that the introduction of the proposed formula would be counterproductive; together with our SHMA partners (Harlow, East Hertfordshire and Uttlesford), Epping Forest District is seeking to provide for a step change in the level of housing delivery in the District and, collectively, across the entire SHMA area. All four authorities are positively preparing

Locals Plans that will facilitate substantial housing growth, in line with the OAN for the Housing Market Area.

From a political perspective, it is not an easy task to reach a position whereby Members agree to move forward with a Plan containing a significantly increased housing figure, as is the case with Epping Forest District. To be faced with the prospect of a further 75% increase on a housing target that has only relatively recently been increased by 100%, through objective assessment is completely unpalatable; nor is it acceptable in the pursuit of sustainable development. Exponential growth on scale proposed as a result of the consultation formula is completely at odds with the purpose of the planning system which seeks the achievement of sustainable development. In reality, the market simply will not deliver new housing at this pace in this District, even if a plentiful supply of development land was readily available.

Flawed affordability adjustment methodology

The affordability adjustment within the consultation proposals is fundamentally flawed. The adjustment comprises a ratio of work-place-based earnings against median house prices; this serves to give a wholly unrealistic affordability scenario. Epping Forest District has very high levels of out-commuting, with around half of working residents commuting into London. The result of this is that earnings levels of the District's residents are much higher than the figure for work-placed earnings. This means that affordability within the District is, in fact, much higher than the affordability adjustment used in the consultation methodology calculates it to be.

The ratio used, setting work-placed based earnings against median house prices within the District, means that Epping Forest District's housing number, set out within the consultation documents, increases astronomically above the OAN figure. A more appropriate ratio would be for any affordability adjustment to comprise a ratio between resident earnings (as opposed to work-place-based earnings) and median house prices; this would generate more sensible/realistic housing figures. The underlying flaw is that a small adjustment in the number of homes will not affect affordability across the District.

Failure to take into account local circumstances, Green Belt and conflict with national planning policy

The proposed formula completely fails to take into account local circumstances; it produces a =n arbitrary figure with no regard to the land constraints that may or may not exist within the respective administrative area.

Over 92% of the District is designated Green Belt and is, therefore, heavily constrained from a development point of view. Previous housing targets have reflected this constraint; the OAN figure has meant that EFDC has had to be bold and proactive in seeking to accommodate the identified need. There are limited sites available on previously developed land within settlements and the strategy in the Local Plan has sought to ensure that these are allocated before considering greenfield sites. Notwithstanding this in order to meet the assessed need the Council is proposing the allocation of sites in the Green Belt amounting to about 500 hectares, or around 1.5% of the District's existing Green Belt.

The NPPF states: 'The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence' (Paragraph 79). The NPPF goes on to state: 'inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.' (Paragraph 87) 'When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations' (Paragraph 88).

The proposed introduction of the formula appears to be in direct conflict with National Green Belt Policy. On one hand the Government is seeking to protect the Green Belt from development, while on the other, setting housing requirement figures that put the Green Belt under extreme threat. It seems that there has been no consideration whatsoever of the impacts of the proposed formula and its resultant housing numbers, in terms of the way that these relate to other planning issues, or of what it means for the respective areas. Local circumstances have been disregarded entirely and this means that delivery of the numbers resulting from the proposed formula is simply unrealistic and unachievable.

Dismantling of the plan-led system

EFDC considers that from a national perspective, the likely implications of the introduction of the proposed formula is that many local planning authorities will halt work on Local Plans and opt to take the approach of 'planning by appeal' on the basis that under the new housing needs formula this option would be the lesser of two evils. This approach contradicts the approach required by national planning policy contained within the National Planning Policy Framework (NPPF). The NPPF requires planning to be 'genuinely plan-led', to empower local people, to set out a clear strategy for allocating sufficient land, and to actively manage

patterns of growth. The introduction of the proposed formula would fly in the face of these core planning principles.

The proposed formula takes no account of local circumstances and will leave LPAs wholly disempowered and disengaged with the planning system. The perception of the proposed approach is that the Government is taking a top-down approach, in direct conflict with the localism agenda.

Undoing significant progress made towards increasing housing delivery

For many local planning authorities the introduction of this formula may mean going back to square one, wasting all the time and financial resources that have been put into preparing a Local Plan. We are pleased that we will be able to use the transitional period proposed in the consultation. Without this transitional period, the Council would have to generate all but a complete new evidence base and a significantly different strategy in order to deliver the new housing requirement proposed by the methodology. This would be extremely wasteful of public money and it would also put the Council in an extremely weak and vulnerable position, undoing all of the positive work and progress made on preparing the new Local Plan. The Council is of the view that the transition period should be extended, to allow local planning authorities who have made good progress to continue with that and to enable authorities to take a plan-led approach to development, as is required by national planning policy.

EFDC is supportive of the proposal to include transitional arrangements and the Council will continue to progress with the finalisation and submission of the Local Plan in order to make use of these transitional arrangements.

Summary

The Council supports the introduction of a straightforward, standardised methodology for calculating objectively assessed housing needs and agrees that there are currently too many areas of possible disagreement when establishing housing need. However, it is critical that any standard methodology must provide a realistic measure of the number of homes required to meet the housing needs of the area, whilst taking into account local circumstances; which the formula in the current consultation does not do.

In summary, EFDC considers that the government should not introduce the proposed methodology for calculating housing numbers for the following reasons:

- The proposed formula is too crude and is not fit for purpose

- The figure emerging from the use of the proposed formula for EFDC increases numbers so significantly in comparison to historical delivery rates that it is impossible for such rates to be delivered. Even if sufficient land could be allocated to accommodate that level of growth, the market simply would not deliver it.
- The affordability adjustment for work place earnings within the consultation proposals is fundamentally flawed
- The proposed formula fails to take local circumstances into account, notably for this District where 92% of the District lies within London's Green Belt designation.
- The proposed formula creates conflicts with national planning policy on Green Belt
- The proposed formula threatens and undermines the plan-led system
- Introduction of the proposed formula would be likely to lead to a reduction in the number of plans being progressed and adopted
- Introduction of the formula will result in the waste of immeasurable levels of time and resource and will undo the huge progress that has been made by many local authorities on preparation of Local Plans and an increase in housing delivery

Appendix A

West Essex and East Hertfordshire HMA response to the CLG proposed “standardised methodology”

Summary

This is a response from East Hertfordshire, Epping Forest, Harlow and Uttlesford District Councils to the CLG consultation on the proposed “standard methodology” for assessing housing need published on 14 September 2017.

We agree that there are currently too many areas of possible disagreement when establishing housing need and more clarity is needed. The Councils therefore support a straightforward, standardised methodology for calculating objectively assessed housing needs – **but we do not support the “standard methodology” that is currently proposed.** Any standard methodology must provide a realistic measure of the number of homes required to meet the housing needs, yet the rate of growth identified by the proposed approach simply isn’t credible for this housing market area.

The assessed level of housing need represents almost 71,300 dwellings over the period for the emerging Local Plans within the SHMA. This equates to two settlements equivalent to the current size of Harlow, and would need an additional new dwelling to be provided for every three homes that exist today.

The problem with the figure arises from the reliance on the latest CLG household projections. These identify an exceptionally high level of growth for the HMA, due to unprecedented levels of net migration recorded over the last five years – more than double the rate recorded by the Census. The projections assume that these exceptional trends are repeated every five years, despite such rates having never been seen before. The proposed affordability calculation then exacerbates this already very high rate of growth.

Taking any household projection as the starting point for the “standardised methodology” introduces many areas of uncertainty into the calculation. Unfortunately, local demographic data can be spurious. The data can’t be relied upon uncritically, and it would be wrong to put aside local evidence about this issue when establishing local housing need and the housing number for the Local Plan. Ignoring local evidence will inevitably undermine confidence in the planning system.

The second part of the standardised methodology relies on a single measure of housing affordability, but the approach that is currently proposed needs further thought and refinement. It cannot be correct that almost 100 local planning authority areas yield an uplift that is greater than 40% (the level of the proposed cap) and areas with limited housing pressures are still subject to a substantial increase, which lacks credibility. Any cap should be based on the overall housing need identified and not only on the affordability uplift. If the household projections are already very high, the cap should take account of this. Areas with lower household projections may need a bigger uplift to make sure that their needs are properly identified.

The Local Plans Expert Group concluded that there was no “silver bullet” that would enable CLG to centrally identify OAN (LPEG Discussion Paper Number 2, para 24). We agree with this conclusion.

However, we also agree with LPEG that there are currently too many issues that are open to a range of interpretations (LPEG Report, para 3.13). There is too much time currently wasted discussing housing need (especially at section 78 appeals relating to individual sites, where appellants seek to argue 5-year housing land supply), and this needs to be addressed.

The data on the current local assessments of housing need that were published by CLG as part of the consultation identify that local authorities own assessments now identify a total housing need for England of around 230,000 dwellings per year.¹ This is only 20,000 dwellings short of the 250,000 that is widely accepted as being needed nationally.

In other words, the current methodology is already yielding assessments that are well within 10% of the total needed nationally. Despite the rhetoric, the current system for assessing housing need isn't fundamentally broken. Providing guidance on some of the specific issues open to interpretation (such as a baseline position for any market signals uplift) could readily close this gap.

We believe that this fundamental change to the methodology for assessing housing need will have serious implications for plan preparation, and it is essential that any change reduces the time that is currently wasted arguing about housing need. Simply adopting a different approach that remains open to argument will not help. It would be better to stick with the current approach (which is already close to identifying the right number of homes nationally)

¹ Taking the latest CLG household projection without any uplift for those 18 areas where no local assessment of need was available

and tightening up guidance on those areas of ambiguity, which would be consistent with the LPEG conclusions.

Introduction

East Hertfordshire, Epping Forest, Harlow and Uttlesford District Councils have worked together as part of a SHMA and understand that it is important to have an honest assessment of housing need that ensures that the right number of homes are planned for their housing market area.

Over the decade from 2001 to 2011, housing supply in our area averaged fewer than 1,400 dwellings each year. We recognise that more housing needs to be built.

Together, we have identified a need to deliver 2,350 dwellings each year from 2011 to 2033 and we are planning to meet all of this need. This represents a total of 51,700 extra homes, and providing these homes will meet our household and population projections (taking account of migration and demographic change) and will ensure that there is sufficient housing supply to cater for housing demand and the associated job growth.

Meeting the housing need that we have identified will require a step-change in housing delivery that will increase housing supply by 70%. This is entirely consistent with the Government objectives to fix the broken housing market and boost the number of new homes being built. We fully support these Government objectives, but it is important that the honest assessment of housing need provides an accurate and robust basis to make sure that the right number of homes are provided.

The “standardised methodology” proposed

The Councils support a straightforward, standardised methodology for calculating objectively assessed housing needs. The Councils agree that there are currently too many areas of possible disagreement when establishing housing need, and more clarity is needed. However, any standard methodology must provide a realistic measure of the number of homes required to meet the housing needs of the area.

It is important that the needs of the area are properly measured in full (without being constrained by any historic plan targets which may not have sought to meet the local needs) but that needs of other areas are not included. Any unmet need from other areas must be considered separately when establishing the housing target for the local plan.

The “standardised methodology” proposed by the consultation document identifies a need for 3,240 dwellings each year across the West Essex and East Hertfordshire housing market area; a total of 32,400 dwellings over the 10-year period 2016-2026. This is comparable to the current number of homes in Harlow. The dwelling stock across the housing market area would have to increase by more than 17% over the decade. Over the plan period 2011-2033, the “standardised methodology” number means that an additional new dwelling would have to be provided for every three homes that exist today.

The Councils do not consider it realistic that such a high number of homes is needed to meet the needs of the local area, even taking account of established migration trends. The rate of growth identified by the proposed “standardised methodology” simply isn’t credible.

Whilst the Councils recognise that the Housing White Paper and the consultation both identify that there would be some opportunity for deviating from the methodology, the consultation paper suggests that there should be very limited grounds for adopting an alternative method which results in a lower need. The standardised methodology identifies similar rates of growth for around 50 local planning authorities (where an additional new dwelling would have to be provided for every three homes that exist today over 22 years), and more would have this level of need if it was not for the 40% cap applied to their recently adopted housing target.

It is likely that most (if not all) of these local authorities would reasonably argue that a lower number was justified in their areas – so whilst the standard methodology would give them a different starting point, it would not overcome the disagreement when establishing housing need. It is therefore important that the number identified by the standard methodology is credible and robust.

Problems with the proposed “standardised methodology”

The standardised methodology is based on a straightforward calculation, and that is to be welcomed. However, taking any household projection as the starting point introduces many of the areas of uncertainty into the calculation.

For example:

- Are the most recent 5-year migration trends that ONS use typical for the area; or given the cyclical nature of migration, are they either too high or too low? We consider it better to use a longer trend that will be more stable, such as 10 years.

- Have recent levels of housebuilding affected migration – either large developments drawing in extra migrants (such as in Uttlesford) or too few homes being built suppressing migration? We do not consider it right that areas already delivering housing have to deliver disproportionately more.
- Do the projected household formation rates provide a reasonable basis for establishing the number of households? Have they been suppressed? We do not consider that trends going back to the 1971 Census are still relevant.
- Can we rely on the data? Has the ONS got the mid-year estimates right in the past? Do the latest estimates reflect administrative data and local knowledge? We consider it right to take full account of local evidence that informs the projection.

All of these questions (and many others) arise from relying on household projections as a starting point. Indeed, most of the arguments at inquiries and examinations stem from the underlying demographic data.

Unfortunately, local demographic data can be spurious. The data can't be relied upon uncritically, and it would be wrong to put aside local evidence about this issue when establishing local housing need and the housing number for the Local Plan. Ignoring local evidence will inevitably undermine confidence in the planning system.

The second part of the standardised methodology relies on a single measure of housing affordability, which yields an uplift to the household projection of up to 40%. Whilst a clear and transparent approach is welcomed, we believe that this single adjustment is too simplistic.

Prior to any uplift, it is necessary to convert the household growth to a housing need which takes account of empty homes and homes used as second homes or holiday homes or otherwise not available to households. This adjustment is necessary even in areas where there is only limited uplift (if any) for affordability.

With regard to the affordability calculation itself, the approach that is currently proposed needs further thought and refinement. It is helpful that the calculation avoids any “cliff edge” effects, but it cannot be correct that almost 100 local planning authority areas yield an uplift that is greater than 40% (the level of the proposed cap). It would be reasonable to expect that any cap should only apply as an exception, and not a norm that affects almost a third of all areas. Furthermore, areas with far more limited housing pressures are still subject to a substantial increase based on the proposed calculation, which lacks credibility.

Notwithstanding these points, a standardised approach for addressing market signals would be welcome. We would propose that this should be based on residence-based earnings – as it is residents that pay local housing costs. We agree that a cap is appropriate, but this should be based on the overall housing need identified and not only on the affordability uplift. If the household projections are already very high, the cap should take account of this. Areas with lower household projections may need a bigger uplift to make sure that their needs are properly identified.

Finally, an honest assessment of housing need cannot be influenced by the housing target in any previously adopted plan. The housing target is not intended to provide a measure of housing need, for it will take account of constraints and may include unmet need from other areas. When planning for housing, it is important that the housing need is identified without constraint in order to provide an accurate and robust basis for planning the right number of homes. On this basis, existing housing targets cannot form part of that calculation.

Issues affecting the “standard methodology” in West Essex and East Hertfordshire

The CLG 2014-based household projections identify an exceptionally high level of growth for the West Essex and East Hertfordshire local authority areas.

The projected growth is largely due to exceptionally high (and previously unprecedented) levels of net migration recorded over the period 2009-2014, on which the projection is based. The Census showed net migration to the housing market area was around 11,200 persons over ten years between 2001 and 2011, and the ONS reduced their earlier mid-year population estimates as a consequence of the more reliable Census data. However, the ONS estimates from 2009-2014 suggest a gain of almost 13,700 persons over only five years. This estimate is more than double the rate recorded by the Census and has a significant impact on the household projections.

The latest CLG household projections for the West Essex and East Hertfordshire local authority areas essentially assume that the exceptional trends in migration from 2009-2014 are repeated every five years over the projection period – even though such rates have never been seen before. It would be wrong to ignore this when establishing an honest assessment of housing need.

Despite the household projections already identifying an unprecedented level of growth for the area, the affordability calculation yields an uplift of 63% in Epping Forest District, 52% in

Uttlesford and 46% in East Herts (which are all subsequently capped at 40%) and an uplift of 33% in Harlow.

All of these adjustments exacerbate the already very high rate of growth identified by the household projections, such that the assessed level of housing need is 3,240 dwellings each year across the housing market area. This represents 32,400 dwellings over the 10-year period 2016-2026 and almost 71,300 dwellings over the 22-year period 2011-2033 for the emerging Local Plans. This is comparable to providing two settlements equivalent to the current size of Harlow.

Whilst it may be necessary to consider for this level of growth when meeting unmet needs from other areas, it is unrealistic to suggest that this scale of development is necessary to meet the housing market area's own needs, even taking account of established migration trends. The rate of growth identified by the proposed "standardised methodology" simply isn't credible for this housing market area.

Conclusions of the Local Plans Expert Group

The Local Plans Expert Group concluded that there was no "silver bullet" that would enable CLG to centrally identify OAN (LPEG Discussion Paper Number 2, para 24). The Councils agree with this conclusion.

However, the Councils also agree with LPEG that there are currently too many issues that are open to a range of interpretations (LPEG Report, para 3.13).

It is helpful to consider the LPEG detailed conclusions on housing need that were set out in Discussion Paper Number 2 (emphasis added):

*24. Some respondents suggested to us that there can be a quick "silver bullet" to identify OAN, perhaps centrally by DCLG, which could save collectively millions of pounds in consultants' fees and years in terms of time taken to produce and agree OAN. **As DCLG Household Projections are the "starting point", why not simply take that starting point and apply a single, fixed adjustment?***

25. There are clear attractions in refining and adopting this type of approach. Calculating OAN would take hours rather than many months. Local authorities would not need to procure consultants or complex demographic models. Of the post NPPF local plans adopted so far, we were advised that on average they plan 109% above household projections. Requiring all local plans to do the same or perhaps better (say

20%) would be a simple, fast and positive step towards enhanced planning for housing delivery.

26. Whilst Government should consider this suggestion, on balance, **LPEG decided not to recommend it** for the following principal reasons:

- i. telling local authorities what their OAN must be is a distinctly “top down” approach which risks losing the advantage of acceptance that locally calculated needs should bring;
- ii. local circumstances do vary and **arriving at a fair, standardised adjustment from CLG projections would be difficult**. We were told, for instance, that the most recent set of official projections are can be vulnerable to statistical anomalies for areas of distinct demography such as university towns, in locations where trends in migration were unduly influenced by the recession, and in areas of low demand. In other words, **relying just on the ‘unvarnished’ projections could lead to inaccurate estimates of need**. Many local authorities and those within the consultancy sector have access to the necessary demographic modelling tools, and have developed sufficient familiarity with local demographic factors to apply the required adjustments, so there are no barriers to plan makers accessing the necessary expertise to apply relevant local adjustments, where clear guidance is available;
- iii. **a standardised upwards adjustment for market signals may be considered unfair for areas that have performed well in delivering housing** compared to others that have accumulated a significant backlog; and
- iv. **locally prepared SHMAs have other, important roles to play** in justifying policies on the **mix of dwellings**, arriving at estimates of **affordable housing need**, and supporting discussions under the duty to cooperate, notably in terms of how patterns of demand might influence **distribution of unmet need**.

The data on the current local assessments of housing need that were published by CLG as part of the consultation identify that local authorities own assessments now identify a total

housing need for England of around 230,000 dwellings per year.² This is only 20,000 dwellings short of the 250,000 that is widely accepted as being needed nationally.

In other words, as LPEG rightly concluded, the current methodology is already yielding assessments that are well within 10% of the total needed nationally. Despite the rhetoric, the current system for assessing housing need isn't fundamentally broken. Providing guidance on some of the specific issues open to interpretation (such as a baseline position for any market signals uplift) could readily close this gap.

However, there is too much time currently wasted discussing housing need (especially at section 78 appeals relating to individual sites, where appellants seek to argue 5-year housing land supply), and this needs to be addressed.

Possible outcomes from this consultation

Based on early consultation feedback, the Government (through presentations by CLG's Chief Planner) appears to be suggesting that the "standardised methodology" will simply provide a new starting point for assessing housing need, and numbers may go up or down from this starting point. This would be the worst of all possible outcomes, as it would "move the goalposts" for all local authorities currently preparing plans (but not yet in a position to submit) as they have to revisit their housing number, whilst doing little to reduce disagreement and debate about the numbers.

The Councils in the West Essex and East Hertfordshire HMA believe that a fundamental change to the methodology for assessing housing need will have serious implications for plan preparation, and it is essential that any change reduces the time that is currently wasted arguing about housing need. Simply adopting a different approach that remains open to argument will not help. It would be better to stick with the current approach (which is already close to identifying the right number of homes nationally) and tightening up guidance on those areas of ambiguity, which would be consistent with the LPEG conclusions.

If official household projections are to be relied on in any way for establishing housing need, it is essential that these are based on an approach which minimises the potential for fluctuations in short-term trends affecting the numbers. It is widely accepted that the use of 10-year trends for establishing migration help to mitigate against numbers that are either too low or too high. This approach has been endorsed by numerous Local Plan Inspectors, with

² Taking the latest CLG household projection without any uplift for those 18 areas where no local assessment of need was available

household projections going up from the CLG starting point (based on 5-year trends) in some areas and coming down from the CLG starting point in other places. If the standard methodology is to continue to rely on official household projections as the starting point, the Government should ask ONS to produce official sub-national household projections based on 10-year migration trends. Future household projections will also be improved by the changes already proposed by ONS in response to its consultation earlier this year.

Nevertheless, if the household projections are relied upon, it remains important that local authorities can deviate from these where there is convincing local evidence of problems with the underlying data – though it should be clear that this should be the exception rather than the norm. Official projections based on long-term migration trends should normally provide a robust basis for establishing local housing need.

As household projections identify household growth, it is necessary for these to be translated to a dwelling figure based on the proportion of usually occupied homes. This is not normally a controversial step in the current process, and CLG already publish data on occupancy rates. This step should apply to all areas, even those areas where affordability is less of a problem.

We also agree that an adjustment is needed to take account of market signals, the impact of affordability and the impact of possible suppressed household formation. However, this must take account of the rate of growth identified by the underlying household projections, as the housing need identified to meet projections may already result in a substantial increase to previous housing supply, especially in areas that have performed well in delivering housing.

On balance, we believe that the housing need that we have identified – a total of 51,700 dwellings over the 22-year period 2011-2033 – represents a robust assessment for our housing market area. Delivering this number of homes would increase the dwelling stock by 28.4% (1.3% per year), a rate that is 70% higher than housing delivery achieved over the last decade. We believe that this is an honest, realistic and credible assessment of the needs of our housing market area.

To deliver 250,000 homes nationally requires the dwelling stock to increase by just over 1% per year. The rate of growth that we have identified for our housing market area is around 25% higher than this national average; which is right, given our location in the Wider South East and proximity to Greater London.

We believe that any assessment based on a “standardised methodology” should identify a level of growth comparable to our own independent assessment. This rate of growth should be towards the upper end of rates of growth for meeting local housing need. Whilst figures for individual local planning authorities may be higher than this when considered in isolation, it is important that any “cap” is considered across housing market areas as a whole – and it should apply to the overall housing need and not to the affordability uplift in isolation.

The standard methodology as proposed yields rates above 1.4% for three quarters of local planning authorities, and this isn’t realistic. In contrast, existing local assessments across the Wider South East (including Greater London and the former East of England and South East regions) identify housing need at just under 1.2% each year. This isn’t enough; but moving towards a rate of 1.3% (or possibly even 1.4% in Greater London) would close the gap to achieve the 250,000 homes needed nationally.