

**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 an 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.