

## **Response to Inspector's 2018-based Household Projections Question, IED026**

*Matthew O'Connell, Braintree District resident*

There is no doubt that this is a challenging component of the examination of the soundness of the NEA Local Plan, both in itself and also due to the fact that the significantly lower ONS 2018 figures have been released "late in the day" in relation to the examination timeline.

I believe that the NEAs' approach in commissioning a summary report from Stantec was appropriate and proportionate. Given the long period since the Inspector's initial post-hearings letter (June 2018) – even though this delay is admittedly largely of the NEAs' making – it is of particular importance to bring the examination to a close at the earliest possible opportunity, as speculative development is rife in Braintree district and therefore it is very much in the public interest for the Section 2 examination to proceed in the near future.

I also believe that the NEAs' original response suggesting a movement to 623dpa, a reduction of 13% from the 716dpa figure in the draft Local Plan currently, is actually most appropriate in context, although I note that the NEAs could perhaps have explained their reasoning more clearly and better linked said reasoning to the PBA / Stantec reports.

The figure for Braintree provided by the 2018 ONS household projections is clearly very significantly lower than the 2014 and 2016 figures; Stantec's explanation of this being primarily linked to migration (and a much shorter historical input time range) seems comprehensive. However, it is clear that the short historical input time range is troubling, with the high migration figure for 2019 providing a warning as to how volatile the migration element can be.

Therefore while *prima facie* there is a material change in the households requirement for the district, the high level of uncertainty around the new figures means that the most appropriate thing to conclude that in fact there have been no reliable new ONS figures which would give rise to a material change to the household projections used to inform the Local Plan previously.

Indeed, from a soundness perspective the NPPF (2012, para 182) requires that Local Plans must be Positively Prepared in order to be legally sound. It is difficult to see how a plan based on a heavily reduced OAN which itself relies on a short historical time range for a volatile input is compatible with being positively prepared to meet "household and population projections, taking account of migration and demographic change" (para 159, first sub-bullet).

If there were further supporting data, e.g. a 2019-updated EEFM model, to provide confidence around a significantly lower households figure than that in the 2014 data, the situation might be very different, but based only on the data at hand, a reduction driven by the 2018 ONS figures seems problematic against this Positively Prepared requirement.

Working on the basis then that the 2014 data-driven 623dpa number remains a starting point for a Positively Prepared plan, it is reasonable to revisit the question of the "market signals" uplift of 15%, which was – Stantec's predecessor entity PBA admitted at the time of writing their initial report (in para 5.100) – somewhat marginal in terms of its inclusion.

Indeed, the fact that as Braintree housing completions (e.g. across 2014-2018) have increased vs the start of the decade, there has still been a fall in migration (i.e. as per the short-dated 2018 ONS figures, which are useful at least for this purpose), implies that the Braintree housing market was likely not fundamentally undersupplied and therefore not responsible in itself for reducing the statistical assessment of new households requirement. As mentioned above, it is unfortunate that the NEAs do not explain this point well in their original letter to the Inspector.

Given the 2014 data and the inclusion – or not – of the market signals uplift to that data have been examined previously and were found by the Inspector to be in line with the prevailing PPG, then it seems entirely legally sound for the Inspector not only to be comfortable with the retention of the 2014 data, but also to allow for a removal of the market signals uplift, such that the OAN moves to 623dpa. This movement is, I assert, the only

material change to come out of a review of the OAN composition at the present time in the examination, and this change would make the Plan up-to-date and sound.

In summary then, the 2018 ONS figures are sufficiently uncertain that they cannot be taken to represent a material change to the OAN for Braintree district; indeed their inclusion as an OAN “starting point” would seem at odds with a Positively Prepared Local Plan. The Inspector may well though feel it is appropriate to revisit the OAN in the Plan and reduce it to 623dpa based on the lack of a requirement now for a market signals adjustment to the 2014 figure. Given that the 2014 data and the original PBA report were comprehensively examined already, it seems entirely appropriate that this material change from 716dpa to 623dpa – consistent with the PPG as such a change would be – could be made without reopening the examination, a move which would not be in the public interest.