



Our Ref: A4187

Your Ref:

1 October 2020

FAO Andrea Copsey

Programme Officer

(By email only: copseyandrea@gmail.com)

Dear Mrs Copsey

**North Essex Authorities Local Plan – Section One
Housing Requirement
Publication of 2018-based household projections**

1. Artisan is instructed on behalf of the Vistry Group Ltd to submit representations on its behalf in response to the Inspector's invitation dated 9 September 2020 to consider the 2018-based household projections. In particular, the Inspector asks two questions:
 - (a) Do you consider that the publication of the 2018-based household projections represents a meaningful change in the housing situation from the situation that existed when I produced my letter of 27 June 2018 [IED/023]?
 - (b) If so, what are the implications of that change for the soundness of the housing requirement figures in the submitted Section 1 Plan?
2. The relevant documents reveal that the general consensus is that Tendring is unaffected by the 2018-based projections and that the change in Colchester is marginal. The rest of these representations, therefore, only consider the change in the Braintree district.
3. The 2018-based projections suggest that the housing situation has changed from that which previously existed. Indeed, the latest projections apparently indicates that the need has decreased by some 41% in Braintree.
4. We do not share the apparent reluctance of the NEAs to reach the conclusion that these latest figures should not be relied upon (NEA/018 and NEA/020). Moreover, it is suggested that the fact that each iteration of the calculation of housing need for Braintree is lower than the last, the downward trend provides justification for a lower housing requirement. By contrast, we consider that the explanation of why there is a downward trend per the Stantec report is highly significant and plainly material to the decision on whether or not to reduce the housing requirement for Braintree.

5. It is important to note that PPG advises at paragraph 2a-015-20140306 (the old version is relevant under transitional arrangements) that evidence of suppressed housing need by virtue of the under-supply of housing is an important consideration. The Stantec report is very clear that the main reason later data shows a decline in projected household growth is that Braintree has failed to meet its housing need – see paragraph 4.14. Therefore, later projections are evidence of suppressed need within the meaning of the PPG. If the Inspector were to reduce the housing requirement in line with more recent projections, it would require an immediate uplift to address the historic under-delivery contributing to suppressed need across the district.
6. There is a real and serious risk that the use of figures derived from the 2018-based household projections will entrench suppressed need. This will compound the historic under-delivery by ensuring its continuation during the plan period. It is submitted that the Plan would not be sound if the housing requirement was reduced in response to the 2018-based projections. While this is of course a matter of planning judgment for the Inspector, the Stantec report could not be clearer in its conclusions: the need appears to have gone down because it has not been met. It is a “self-fulfilling prophecy.” The Stantec report goes on to suggest that this does not provide justification for a reduction in the assessed need from 2013. We agree.
7. Furthermore, it should also be noted that the more recent household projections use fewer data points in its calculations (see paras. 3.4-3.9 of the Stantec report). Generally speaking, a smaller data sample produces more unreliable results. The Stantec report also notes that the projections calculated from only two data points might be unreliable and not representative. The issue of widely fluctuating migration is mentioned in the Stantec report.
8. The 2014-based projections uses data points from the 1971 census. It will therefore cover full economic cycles and different periods of home ownership policy. While it is noted that the period 2001-2011 saw a downturn in demand, the current level of unaffordability has resulted in a national housing crisis, which the government is desperately trying to remedy. Part of that remedy includes calculating need using the 2014-based projections. While the standard method is not relevant to this Local Plan, the fact that the government is still using the 2014-based figures is, we say, relevant.
9. We must of course keep in mind one of the key national planning policies, which is that the supply of homes should be “significantly boosted”. It is submitted that any reduction to the housing requirement in the Braintree district from that already considered sound would run counter to this aim.
10. We note that a challenge to a decision of another Local Plan Inspector that made similar findings to the submissions set out above was rejected by the High Court: see *Keep Bourne End Green v Buckinghamshire Council* [2020] EWHC 1984 (Admin).

11. The other key point to note from the Stantec report is that it is the change to internal migration that has caused the reduction in projected growth in Braintree. The data shows that due to the under-delivery of housing in the district, that growth has shifted elsewhere – to Colchester for example. However, the 2018-based projections show a marginal increase to Colchester’s projected growth. Therefore, per para. 4.8 of the Stantec report, “... *the insignificant increase in Colchester’s projected growth is not remotely enough to counterbalance the reduction in Braintree’s projection.*” The danger of mixing housing requirements using different projections is noted at 4.12 of the Stantec report.
12. It is clear, therefore, that the evidence strongly indicates that the 2014-based figures should be used. The 2018-based projections are unreliable and have technical weaknesses. It does not represent a meaningful change for the purpose of the PPG and they should not be used to justify the reduction of the housing requirement already found sound. It is contended that any reduction risks making the plan unsound in relation to the requirement to be positively prepared and the clear aim of national planning policy to boost significantly the supply of homes.
13. Finally, we note that the primary reason for the more pessimistic household projections is that not enough housing was planned for. We must be careful not to allow poor planning to suppress growth any further in this district.

Your sincerely

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