

**From: Trevor and Rowena Plumb**

Date: Mon, 5 Oct 2020 at 10:28

Subject: North Essex Section 1 Plan – Invitation to comment on 2018-based household projections

To: <[copseyandrea@gmail.com](mailto:copseyandrea@gmail.com)>

Dear Mr Clews

Thank you for the opportunity to comment.

I am of the opinion that the difference between the housing requirement figures for Braintree set out in the Section 1 plan and those supplied by the ONS in June 2020 is so large that it cannot be considered anything other than a meaningful change. The justification of the plan figure by the NEAs appears to me to be an attempt to use alternative statistics to justify their position and as a private citizen I would favour the independent analysis and computation conducted by the ONS.

The second of your questions, what are the implications for the soundness of the housing requirement figures in the submitted Section 1 Plan, is much more difficult. The absence of a Local Plan has had an enormous impact on the rural communities of Braintree District in particular. Using the plan figure, BDC have struggled at times to demonstrate a 5 year land supply which has resulted in sites that are not allocated in section 2 of the plan receiving planning permission: their advocates cite that the current Local Plan is out of date and therefore silent. This highlights the clear disconnect that exists between Planning Policy and Planning Applications. Therefore on one hand the need to have an up to date Local Plan is crucial, but if that includes a figure that is far too high there will still exist an opportunity for the development of unallocated sites should the supply trajectory fail to deliver the five year land supply at any stage. This will result in further over-development in rural communities where there is no demonstrable requirement and no infrastructure to support an increased population. On the other hand, revising the plan to include a lower housing requirement will inevitably delay the adoption of the Local Plan. If a lower housing requirement is included this should mean that the five year land supply is always met during the plan period, hopefully inhibiting speculative development on unallocated sites, but this might mean that in order to produce a coherent plan section 2 some previously allocated sites might have to be de-allocated. This sounds a lengthy and fraught process!

I do not know the answer, but the lesser of two evils would seem to be revising the plan to reflect the lower, evidenced housing requirement and suck in the delay. A better solution would be to press on with the plan as now drafted, but to acknowledge that it over-delivers and thus use the ONS figures for calculating five year land supply. Is that possible? I would repeat my earlier observation that the current planning framework permits a huge disconnect between Planning Policy and Planning Applications that blights both processes.

I hope this is a valid response and thank you again for the opportunity to express my views. I hope you possess the wisdom of Solomon in your deliberations!

Yours sincerely

Trevor Plumb

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