

# COGGESHALL PARISH COUNCIL

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## Coggeshall Parish Council Response to consultation on 2018 based household projections. 27 June 2018 [IED/023]

### Summary

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It is no surprise to CPC that these questions arise as it is stated very clearly in the letter responding to garden communities dated 15<sup>th</sup> May 2020 where para 272 states:-

*In addition, if the official 2018-based household projections are published while the examination is still in progress, consideration will need to be given to any implications the projections may have for the soundness of the housing requirement figures in the Plan.*

Whilst we recognize the need to accept the modifications to the local plan, accept the section 1 modification such that section 2 can be inspected and BDC can actually have a local plan in place along with the protection that affords, we welcome the opportunity to provide comments on the question asked in the letter and have summarised our response as

- 1) CPC do think that the change in housing numbers based on the revised ONS numbers from 716 to 346 per year is meaningful and, given the size of the change, will change any subsequent calculations
- 2) CPC suggest that given the above level of change there is sufficient allocated housing in section to meet the districts housing need and that this allocation can be adopted without the need for further consultation.

A more details response is provided below

# 1 Question 1

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*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]?*

It is inevitable that there will be a latency in any protections, consequently CPC refer directly to the comparison between growth figures actually contained in the ONS report (that includes the growth figures from the DCLG and the ONS).

The DCLG 2014<sup>1</sup> projections showed the growth to be 2.2 million over the plan period whereas the ONS projected an increase of 1.6 million showing the DCLG prediction being 27% more housing in the current period.

If we now consider the actual percentage change over the same period we see a year on year reduction of the housing number projections of some 1.5% (3% over 2 years) since 2014 as shown in figure 1 below

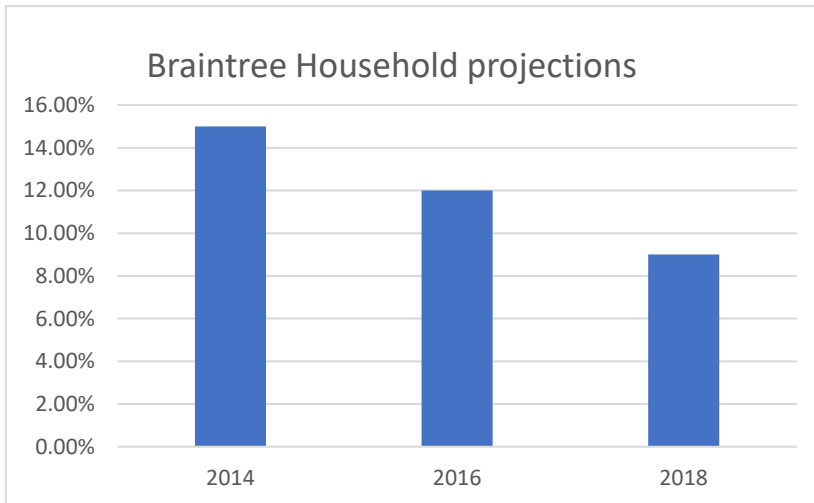


Figure 1 Braintree housing projections

The above graph clearly shows a 6% reduction to 9% from 15% ( $6/15=0.4$ ) or a 40% reduction in actual housing projections

Furthermore up to date projections on UK population growth show .06 Million less population compared with the 2014 projections due to *lower assumptions for future levels of fertility and international migration, and a slowing rate of increase in life expectancy with a projected population is 0.4 million less in mid 2028 and 0.9 million less in mid 2043*<sup>2</sup>.

These facts combined confirm that the published ONS figures show a meaning full change, is linear, and did exist when the letter of 27 June 2018 [IED/012] was produced.

CPC accept that there are other mechanisms and influencing factors that determine the housing supply for the plan period such as jobs, houses delivered and a buffer, however this level of change, when added, subtracted or used to multiply any figure that leads to an final housing requirement calculation will inevitably result in a reduction because it is a 'reducing factor'.

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<sup>1</sup> 2018 ONS Household projections for England

<sup>2</sup> National Population projections 2106 bulletin

## 2 Question 2

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*If so, what are the implications of that change for the soundness of the housing requirement figures in the submitted Section 1 Plan?*

If we look at the housing supply for BDC we can put the changes in the context of the existing supply as follows <sup>3</sup>

1. The housing requirement to 2033 stands at 14320 dwellings
2. The housing delivered to June 2020 is approx. 3334 dwellings
3. Sites with planning inc outline provide 6099 dwellings
4. Total sites with planning and delivered 9433 dwelling (1+2 )
5. Sites Identified to 2033 is 4986 dwellings
6. Total 14419 dwellings
7. Using the new ONS numbers the balance required from 2020 to 2033 is approx. 4537 (ie 13 x 349) so excess of 449 dwellings
8. The total requirement for housing (delivered 2 above and 7 above) 10636 dwelling
9. Total reduction in housing 3684 dwellings to be provided 2020-2033

In response to the above CPC believe that there are the following implications when changing the housing requirements

1. The reduction in the district housing requirements  
Based on the above there is a case for actually reducing the allocation within the section 2 allocated housing thereby relieving pressure on the district and establishing a more meaningful and achievable housing delivery test and 5 year supply
2. That Section 2 allocated housing may need 'reconsulting'  
CPC believe that there is ample allocated housing within section 2 to address the districts housing need, and given the oversupply as shown above (even allowing for a buffer), there is no need to go to consultation since the allocated land has already been consulted on (in much the same way as Tendering have done)
3. That the 5 years supply changes  
Again this change is for the better insomuch as it means that BDC can and are meeting their 5 year supply (assuming changes accepted) with all the protection this affords against speculative development
4. Faster implementation of Local plan  
BDC currently does not have a local plan in place due to the delays in section 1, moving forward in the manner suggest herein should allow the speedy adoption of section 2 (without West of Braintree and Colchester Braintree boards garden communities) and without further consultation will provide protection against speculative development

## 3 Requested reading

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You have requested that responses refer to the following specific letters and we have commented briefly on these letters

### 3.1 [NEA018 - NEA Statement on 2018-based Household Projections - 31st July 2020.](#)

BDC simply remove the uplift in order to prevent further consultation and delay, it does not accommodate any of the changes highlighted herein and consider the impact of progressing section 2 'un-consulted, we think this is incorrect

### 3.2 [NEA020 - Further response on 2018 Household projections - 24th August 2020.](#)

In this response the NEA's have concluded that at this time it does not believe there has been a significant change in the housing need situation for Braintree District which represents a meaningful change such that the presented figure would be unsound ignoring or overlooking the ONS trends and its implications.

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<sup>3</sup> Source BDC trajectory issued July 2020

### 3.3 Santech report

The NEA have used the Stantec report out of context since it states

*new projections imply a reduction in Braintree's housing need of between 208 and 273 dpa. The evidence suggests that this is due to changes in underlying realities, rather than just technical changes in method. Specifically, the reduction is caused by two changes that have occurred since the 2014 projections :*

and the report goes on to cite migration to Braintree is falling and that life expectancy has flattened out actually supporting the ONS figures