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**Delivered by email**

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Ref: MATS3000

Dear Ms Copsey

## **BRAINTREE SECTION 1 LOCAL PLAN - IMPLICATIONS OF 2018 HOUSEHOLD PROJECTIONS – REPRESENTATIONS ON BEHALF OF PARKER STRATEGIC LAND**

### **RESPONSE TO CONSULTATION ON 2018-BASED HOUSEHOLD PROJECTIONS**

We write following the Inspector's invitation, to submit comments on the implications of the 2018-based household projections for the housing requirements in the Braintree District Section 1 Local Plan. This letter addresses the Inspector's two questions as set out in his letter of 9<sup>th</sup> September 2020.

#### **(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]?**

We agree with the stated position of Braintree District Council in the NEA's submitted response that the 2018-based household projections do not for the purpose of the Local Plan proceeding represent a meaningful change (NEA/020). We note that this view is also supported by the other North Essex Authorities.

In this context we recognise as set out in the Council's submitted evidence (NEA/018) that the latest 2018 SNHP project a lower level of household growth over the plan period. We agree that:

- household projections are the starting point, and do not, in their own right, establish what the housing requirement for an area should be;
- *"The ONS 2018-based projected growth of 357 dpa is unstable, and hence unreliable, due to the trend period for migration being just two years."*; and
- the 2018-based household projections are themselves a consequence of lower housing requirements in the District.

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In the case of the latter point this is clearly acknowledged at Paragraphs 4.13 and 4.14 of NEA/018a, which states:

*“... As we have seen, the main reason why the 2018 projections are lower than the 2014 ones appears to be that in the first five years of the plan period housing delivery has been too low to accommodate the projected growth. Consequently population and household growth in those years was below that predicted in the old projections, and the new projections rolled forward that low growth into the future.*

*In summary, the main reason why the projected housing growth went down is that since the base date of the submitted plan the planned land supply has fallen short of the original projection. In other words, the assessed housing need from 2013 onwards was correct. The reason why that need appears to have gone down is that it has not been met – a self-fulfilling prophecy.”*

This is further reinforced by the Objectively Assessed Housing Need Study - Update 2016 (paragraph 5.41) which states:

*“Braintree saw sharply reduced housing delivery from 2008-09 onwards, partly due to the introduction of housing targets well below earlier rates of delivery, and land allocations to match. Thus, the indications are that planning in Braintree undersupplied housing demand. But this undersupply has not resulted in house price growth above the general trend. The likely reason is that Braintree’s unmet demand was transferred to other areas in the HMA and beyond.”*

Furthermore, we note Stantec’s observation in NEA/018a that the PPG does not provide a meaningful change but that: *“To determine this issue requires judgment, to balance the benefit of revising the numbers against any cost, effort or delay to the plan that would be required to make the change”*. In this context it is important to reflect on the fact identified by the NEAs that a delay to the Local Plan process could mean that a new methodology for calculating housing need would be in place where the Draft Plan was delayed and/or withdrawn. Where the draft Section 1 Local Plan refers to the housing requirement for Braintree District being 716 dwellings per annum the current standard method calculates a need of 857 homes per annum, which is evidently higher. By way of reference the revised standard method recently consulted upon by the Government as part of its proposed changes to the planning system also projects a higher, albeit reduced, need of 776 homes per annum.

The comparative scale of the affordability challenge in Braintree is the key factor behind the higher levels of housing need calculated under the standard method and the proposed revision. The severity of this issue being also identified in the Objectively Assessed Housing Need Study - Update 2016 (paragraph 5.39), which states:

*“Measured in relation to workplace earnings, housing affordability in Braintree has always been worse than the national and regional average, though close to the Essex average. The gap between the district and England has tended to widen over the years, and particularly in 2014 and 2015.”* The recognition of the severity of this issue further supports the Council’s approach to maintain its proposed housing requirement as an appropriate minimum.

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

The response above confirms our judgement, in accordance with the Council’s similar conclusion, that it would not be a sound approach to reduce the housing requirement for Braintree District. This recognises the national imperative to boost significantly the supply of housing (as per NPPF, 2012 against which this Plan is being examined), to support economic growth and because the reduction would not help to address housing affordability issues.

Yours sincerely

David Murray-Cox  
**Director**