

**Braintree, Colchester and Tendring Local Plans Section One  
Implications of 2018 based Household Projections**



**October 2020**



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# 1 INTRODUCTION

## 1.1 Context

1.1.1 Gladman welcome the opportunity to comment on the Implications of the 2018 Household Projections on the Braintree, Colchester and Tendring Local Plans Section One.

1.1.2 Gladman Developments specialise in the promotion of strategic land for residential development and associated community infrastructure and has considerable experience in the development industry. From that experience, we understand the need for the planning system to provide the homes and jobs that are required to meet Central Government's objectives and the needs of local communities.

1.1.3 Our comments on the 2018-based household projections are contained in Section 2 below and are intended to be brief. However, should further hearings be needed to discuss the implications of the projections for the current Examination process, Gladman would request to be kept informed of any such sessions.

## 1.2 Plan Making

1.2.1 The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

## 2 IMPLICATIONS OF THE 2018 BASED HOUSEHOLD PROJECTIONS

### 2.1 General Comments

- 2.1.1 Gladman firmly support the NEA Councils' position, set out in the letter to Inspector (NEA/020), that the analysis of the 2018 based Household Projections shows that there has not 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"*. It is noted that both Colchester Borough Council and Tendring District Council share this view with Braintree District Council. Gladman concur with this conclusion.
- 2.1.2 We set out in our response to the Proposed Main Modifications, which were submitted on 9<sup>th</sup> October 2020, that we had concerns with the potential use of the 2018 Population Projections as a basis for the North Essex Plan Section One. We firmly believe that any consideration of the use of the 2018 Population Projections would need to be considered fully through the re-opening of the Hearing Sessions, as this would completely change the basis of the Plan and would be a significant departure from the Plan that was submitted for Examination. It is considered therefore, that the Plan should continue to use the 2014 Population Projections in order to avoid significant delay to the Examination and adoption process.
- 2.1.3 The North Essex Local Plan Section One is being examined under the transitional arrangements as set out in paragraph 214 of the 2019 NPPF which allowed Local Planning Authorities (LPAs) that had submitted plans, or were close to submission, to continue with their existing evidence base. This clearly reflects the Government's focus on a plan led system and is aimed at ensuring that all LPAs had up-to-date adopted Local Plans as soon as possible.
- 2.1.4 If the NEAs were to rely upon the new evidence contained within the 2018-based Household Projections, then this could lead to a significant delay in the plan preparation process which would be contrary to the purpose of the transitional arrangements. The hearing sessions would have to be reopened in order to consider the new evidence fully and this could lead to significant changes being required to the Section One Plan.
- 2.1.5 Use of the 2018 based Household Projections would also be inconsistent with the Government's restated ambition to significantly boost housing supply in order to deliver a minimum of 300,000 homes per year. The level of growth shown in the Projections overall is below the level shown in the 2016-based Household Projections, figures which the Government has firmly guided LPAs away from using.
- 2.1.6 The continued reliance on submitted evidence for transitional plans is also supported in the November 2018 letter to Chief Planning Officers which states, in its update on the use of the 2016-based household projections, that plans submitted on or before the 24 January 2019 can be based on existing assessments of housing need at the time of submission. This would suggest that the

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Government were not endorsing the use of the later household projections within transitional plans in the same way that they did not endorse their use in the current standard method.

- 2.1.7 There is also a concern with the 2018 based Household Projections when the data is analysed specifically for Braintree. The data clearly shows a reduced level of household growth within the district. However, as set out in the evidence-based document NEA/018, there are significant concerns with the robustness of the data owing to the trend period for migration being just two years.
- 2.1.8 With all of the issues with the 2018 based Household Projections highlighted above and indeed within the Councils' evidence base and correspondence, the only logical approach to ensure that the Section One Plan is adopted as quickly as possible, is to continue to rely on the evidence base for household growth that supported the Plan at the point of submission and has been relied on by the Councils throughout the Examination process.
- 2.1.9 However, if the NEAs or the Inspector wish to revert to the use of the 2018 based Household Projections then the only way of doing this is through the medium of reopened hearing sessions, providing the opportunity for all participants to fully explore this issue. If this is the case, Gladman would wish to be involved in those sessions.