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9<sup>th</sup> October 2020

Dear Mr Clews,

**Response to Consultation on 2018-based Household Projections**

Persimmon Homes Essex welcomes the opportunity to comment on the implications of the 2018-based household projections and whether they represent a meaningful change in the housing situation from that which existed in June 2018.

**Persimmon Homes**

Persimmon Homes are one of the UK's leading builders of new homes with a track record of delivery in the Essex region. Persimmon Homes are a developer with significant experience of both market and planning issues in the area, as well as being a 'user' of the Development Plan.

Persimmon Homes are a Member of the Home Builders Federation (HBF), the principal representative body of the house building industry in England and Wales. Their members account for over 80% of all new housing built in England and Wales in any one year.



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## **2018-based Household Projections**

In responding to whether there has been a meaningful change in the housing situation from that which existed in June 2018, the focus needs to be placed upon that of Braintree District Council's future projected housing situation. The Councils of Colchester and Tendring show little change in their projected growth in both the periods from 2013-2033 and 2013-2037 which are not thought to be considerable in their differences.

The main impact of the 2018-based household projections is with regard to the much-reduced level of household growth expected within the Braintree District over both 2013-2033 and 2013-2037. The scale of this reduction is set out both in your letter and in the Council's paper on this matter (NEA018a).

As with any statistics and projections the background must be assessed to understand why a pattern or trend is occurring and whether this is justifiable reasoning for any marked increase or decrease in assessed numbers. The population projections are based on past trends which show a substantial decline in migrating and reduced growth rates in Braintree. This may be as a reaction to the conditions of a limited housing supply within the District and resultant household's requirements being met by a surplus of provision in the Colchester borough. This however may not be repeated and should not be relied upon as a solution to future housing needs.

A larger issue at play is the shortfall of housing provision in London which will primarily need to be met by the South East authorities including those such as Braintree.

Concern has been raised for some time within the housebuilding industry on London's inability to meet its housing needs with the capital failing to meet its requirement of delivering 42,000 homes per year. This failure to deliver sufficient homes has been reflected in the new London Plan which is still to be adopted following the changes requested by the Secretary of State.



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This plan identified a housing need of some 68,000 dwellings per annum to meet future needs and the backlog in delivery from the current London Plan.

This shortfall across the Plan period will contribute to out-migration from the capital to the adjacent wider South East area where this shortfall will need to be met.

The below table from the Home Builders Federation shows this impact upon the South East and more specifically, upon the Braintree District.

<b>LPA</b>	<b>Net internal migration to Braintree 2011</b>	<b>Net Internal Migration to Braintree 2019</b>
Basildon	77	137
Brentwood	57	102
Castle Point	25	40
Chelmsford	371	591
Colchester	-60	-125
Epping Forest	24	127
Harlow	54	88
Maldon	114	-17
Rochford	-17	12
Tendring	0	-113
Uttlesford	84	-1
London	465	813

Source: ONS Internal migration detailed estimates, HBF analysis

As can be seen in the table above net internal migration to Braintree from London was higher compared to the other Essex authorities and is substantially increased since 2011. This migration pattern indicates that when looking at all Essex authorities it is Braintree which takes the greatest internal migration population numbers.



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Should London continue to suffer from housing number shortfalls, Braintree will be at the forefront of taking some of this unmet need within Essex and therefore cannot reduce its housing requirement over the Plan period.

As well as the above, it must also be reaffirmed that the Government continue to have the target of delivering 300,000 homes per year and the reduction of authority's housing requirements will not aid in meeting this.

## **Conclusion**

In responding to whether there has been a meaningful change in the housing situation from that which existed in June 2018, the focus needed to be placed upon that of Braintree District Council's future projected housing situation given the greater projected decline compared to the authorities of Colchester and Tendring.

Despite this projected change in the 2018-based household projections the impact of London's inability to meet its housing need greatly effects the housing requirements across the South East. Coupled with this, across all of the Essex authorities it is Braintree which has received the highest internal migration rates from the capital. It is therefore essential that the housing requirement figures are not modified in response to the latest household projections.

Within the background of the Section One Local Plan being examined under the transitional arrangements and keeping in mind the Government's target of delivering 300,000 homes per year, we consider that the 2018-based household projections do not represent a meaningful change from the situation which existed in June 2018. We therefore consider it not necessary to modify the housing requirements on the basis of the most recent demographic projections.



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Yours sincerely

**Persimmon Homes Essex**