

RESPONSE TO CONSULTATION ON 2018-BASED HOUSEHOLD PROJECTIONS – NORTH ESSEX SECTION**1 LOCAL PLAN**

1. These representations are prepared on behalf of L&Q Estates Ltd (hereafter 'L&Q') regarding their land interests in Braintree. In particular, a site known as 'Straits Mill' which is draft allocated in the emerging Braintree Section 2 Local Plan under Policy LPP 19. The site received a committee resolution to grant permission in January 2020 subject to S106 agreement which is to be completed imminently.
2. This technical note answers the questions posed by the Inspector in his email to respondents dated 09 September in relation to the 2018-based household projections:
 - (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]?*
 - (b) *If so, what are the implications of that change for the soundness of the housing requirement figures in the submitted Section 1 Plan?*
3. The following sections consider the changes because of the projections and outlines why they are not considered to represent a 'meaningful change' when compared to IED/023 in respect of the starting point of the OAN.
4. Before considering the questions we wish to make clear that our representations relate solely to the starting point estimate of the OAN in North Essex as set out in the 2014 Planning Practice Guidance (PPG), and not whether additional uplifts are required to address market signals and employment trends in each of the Districts.

National Policy and Judgements

5. We do not consider that the publication of the 2018-based household projections represents a meaningful change in the housing situation across North Essex. The PPG (IED-023) states that *'this does not automatically mean that housing assessments are rendered outdated every time new projections are issued'*. It is therefore clear that new projections do not necessarily need to be considered in setting the OAN unless there is a 'meaningful change' in the housing situation for the assessment area.
6. A judgment handed down by the Planning Court (Holgate J) on 23 July 2020 in the case of *Keep Bourne End Green v Buckinghamshire County Council (formerly Wycombe DC) [2020] EWHC 1984 (Admin)* sets the legal principles in relation to this matter.
7. In short, the 2016-projections were released shortly after the closing of Examination and showed a c.40% decline to the 2014-projections which formed the basis of the Local Plan at Examination. The Inspector found that there were some concerns over the reliability of the 2016-projections and recognised that the projections form only the starting point. A decrease in housing also ran contrary to the Governments clear guidance to boost housing supply.
8. The judge rejected the claimants challenge that the Inspector *"misinterpretation or misunderstanding of national policy/guidance regarding published household projections, leading to the erroneous rejection of the 2016 projections as the demographic starting point for calculation of OAHN."*

Reliability of the 2018-Based Household Projections

9. A significant number of parties have technical concerns about the 2018-projections, a number of these concerns are similar to the concerns relating to the 2016-projections. These concerns regarding the 2016-projections were also shared by MHCLG and is reflected by the continued use of the 2014-projections as the basis for the housing standard method.
10. Despite this, the Examination is taking place under OAN and not the Standard Method, however these concerns are still relevant. They include:
 - Concerns around the suitability of the internal (UK) migration assumptions of the 2018-based Sub National Population Projections. In particular, the two year period this covers rather than the usual five years or 10 years which can skew figures.
 - In respect of the 2018-projections and the 2016-projections before them, they are not considered to be as robust at the 2014-projections used for this Local Plan. The 2014-projections were produced by MHCLG, whereas the 2016 and 2018 projections were produced by the Office for National Statistics (ONS).
 - Other technical concerns around the ONS' suppression of household formation by only focusing on data between two census points, rather than five as used by MHCLG

Comparison of Projections in North Essex

11. Notwithstanding the above, it is important to consider the implications of the above on North Essex. This should also be within the context of examination document IED/022, in which the Inspector concluded there was no 'meaningful change' between the 2014 and 2016 projections. The 2016-projections represented a 5.3% increase in the North Essex Housing Market Area (HMA).
12. The difference between the 2014 and 2018 projections is a 7.7% decline over a 24-year period. When compared to the difference between the 2014 and 2016 projections there is only as 2.4% difference. It is therefore reasonable to suggest that there has been no 'meaningful change', with the change broadly consistent with IED/022. The 2014-projections also sits between the 2016 and 2018 projections and therefore is not an outlier, instead it is the middle ground between the three sets of projections.

Conclusion

13. It is considered that for the reasons above there is no 'material change' in the housing situation since June 2018, and that the Examination should continue in accordance with the more robust 2014-projections which the Plan was produced against. The 2018-projections like the 2016-projections are not considered to be sound, and significantly may skew findings in either direction.