

Braintree Local Plan Section 2

Examination Hearing Statement

Main Matter 5 (A Prosperous District – Homes – Policy LPP 17)

**Prepared by Strutt & Parker on behalf of Pigeon Investment Management Ltd
(Respondent ID: 874569) and M Scott Properties Ltd (Respondent ID: 1022300 and 607901)**

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1. Introduction

- 1.1 This Hearing Statement concerns Main Matter 5 (A Prosperous District – Homes – Policy LPP 17) of the Local Plan Section 2 (LPS2) Examination, and is made on behalf of Pigeon Investment Management Ltd (Respondent ID: 874569) and M Scott Properties Ltd (Respondent ID: 1022300 and 607901). These two parties have separate interests in the LPS2, but share the same concerns in relation to the LPS2 relating to Main Matter 5.
- 1.2 Considerable time has elapsed since the LPS2 was prepared and published for consultation in 2017. The housing land supply position has understandably altered over the last four years, and we note that the Council has provided a revised housing trajectory within Local Plan Examination Topic Paper 2 (TP2). A review of this trajectory is provided as **Appendix A** to this Hearing Statement, and has informed our response.
- 1.3 As requested, we have sought to avoid repeating matters raised within our representations within this Hearing Statement.
- 1.4 The LPS2 is being examined in relation to the NPPF 2012, as per the NPPF 2019 transitional arrangements. As such, references to NPPF within this Hearing Statement are to the NPPF 2012, unless otherwise stated.

2. Main Matter 5

Question: Does BLP Section 2 and in particular Policy LPP 17 Housing Provision and Delivery demonstrate an adequate supply to meet Braintree's housing requirement as set out in BLP Section 1 (14320 new homes) and its timescale for delivery within the plan period 2013 - 2033?

Headroom above minimum requirements

- 2.1 It is important to note that the NPPF (paragraph 14) not only requires LPS2 to meet the District's development needs, but for it to be imbued with sufficient flexibility to be able to respond to rapid change.
- 2.2 In practice, this requirement usually entails provision of headroom above the minimum housing target. Such an approach helps allow for changing circumstances, such as allocated sites failing to come forward as anticipated, changes to housing need / demand, and provides for much more positive and flexible plan-making.
- 2.3 In terms of the degree of headroom required to achieve the requisite flexibility, there is no fixed percentage or number of dwellings, and approaches found sound have varied in different Local Plans.
- 2.4 In the case of the Guildford Local Plan, a headroom of 3,984 dwellings / 37% was deemed appropriate, and again in the context of this necessitating further Green Belt release beyond that required to meet the minimum requirement. In this instance, the Examination Inspector noted that such a headroom was justified, notwithstanding the additional loss of Green Belt this would engender, as it would help ensure a robust strategy for meeting needs in the event that there is slippage in the delivery of housing from the allocated or committed sites; as well as helping provide for the anticipated level of unmet need from neighbouring Woking, with the Inspector noting that there would be a continuing level of undersupply over the period of Woking's newly reviewed plan.
- 2.5 This scale of headroom above the minimum housing requirement deemed necessary within a Local Plan is by no means confined to those in which there was an unmet need in a neighbouring area. In the Inspector's Report on the South Oxfordshire Local Plan for example, it was concluded a headroom of 27% (6,506 dwellings in absolute terms) was appropriate, with the Inspector determining the reduction called for by some through the examination would make the plan "*much less resilient in the face of potential delays to one or more of the strategic allocations*"¹. Notably, and as with the Guildford Local Plan, this was in the context of further Green Belt being required to be released in South Oxfordshire to accommodate this headroom – a constraint that is not present in the case of Braintree.

¹ Paragraph 205 of the Inspector's Report on the examination of the South Oxfordshire Local Plan 2011-2034 (27 November 2020),

- 2.6 In the case of the Mansfield Local Plan, the Inspector's report (31 March 2020) concluded a headroom of 2,226 dwellings (34% of the housing requirement) was appropriate given that the Local Plan included reliance on two long-term strategic allocations.
- 2.7 More locally, Chelmsford Local Plan (adopted May 2020) approach to meeting housing needs entailed a strategy of delivering 21,843 dwellings against a requirement for 18,515 over the plan period 2013-2036. A headroom of 18%, or 3,328 dwellings in absolute terms. In relation to this, the Examining Inspector concluded:
- “Overall, some 21,843 dwellings have a realistic prospect of being delivered over the Plan period... It more than provides for the identified housing requirement of 18,515 dwellings... It also provides a suitable buffer to ensure that the Plan remains robust in the event that there is slippage in the delivery of any of the allocated or committed sites. It also supports the provision of more affordable housing, improving overall affordability in Chelmsford”².*
- 2.8 It is important to note that, as acknowledged at paragraph 2.31 of TP2, the housing supply LPS2 is now projected to deliver has been reduced compared with the submitted version of the Plan, i.e. fewer homes will be delivered than the version of the LPS2 that has been tested, appraised and consulted upon.
- 2.9 The submitted LPS2 reported it would deliver a supply of 15,366 dwellings 2017-2033, in addition to 1,405 completed 2013-2017 – a total of 16,771 dwellings. Against the minimum requirement of 14,320 dwellings, this equated to a headroom of 2,451 dwellings, or 17% of the minimum requirement.
- 2.10 However, TP2 reports that the LPS2 would now only deliver a total of 15,772 dwellings – a headroom of 1,452 dwellings / 10%.
- 2.11 Whilst there is a lack of definitive guidance as to what headroom should be provided, we suggest that the greater the uncertainty, and / or the likelihood of changing circumstances, the greater the need for flexibility. As set out within this Hearing Statement, there are a number of issues pertaining to housing delivery in and around Braintree District which we consider give rise to the need for greater flexibility, and the provision of a greater headroom to ensure that needs will actually be met in full. These include:
- Persistent under delivery of housing within Braintree District;
 - Current local housing need versus planned delivery within the housing market area;
 - Unmet needs in other neighbouring areas;
 - Potential changing patterns in housing demand as a result of the pandemic;

² Paragraph 154 of the Report on the Examination of the Chelmsford Draft Local Plan (25 February 2020)

- Concerns regarding the robustness of the latest housing trajectory (as set out in TP2, and discussed in Appendix A to this Hearing Statement);
- Reliance on windfall in projected supply.

2.12 The above are addressed in turn within this Hearing Statement. In addition, we note that TP2 includes the Council's mitigating factors regarding the reduction in projected housing delivery. These are also considered later within this Hearing Statement.

Persistent under delivery of housing in Braintree

- 2.13 The NPPF (paragraph 47) establishes the principle of the need for housing supply to incorporate a greater buffer above minimum requirements where there has been a persistent record of under delivery, stating that in such circumstances five-year housing land supply buffers should be increased to 20% to "*provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land*" (paragraph 47).
- 2.14 Braintree's 2020 Housing Delivery Test (HDT measurement) was 85%, making it the worst performing non-Green Belt authority in Essex. The HDT 2019 measurement was 67%. Only twice since 2013/14 has the annual number of net additional homes delivered met or exceeded 716 (the dpa requirement in the Local Plan Section 1). TP2 notes that annual housing completions have dropped to as low as 182 during 2013 and 2021, and have averaged 520dpa during this time.
- 2.15 We consider the District's delivery record suggests a need to provide a significant headroom above the minimum requirement within the supply, in order to avoid / minimise delivery continuing to fail to meet need.

Current local housing need in the housing market area

- 2.16 Braintree's housing market area (HMA) includes Chelmsford, Colchester and Tendring. All three of these authorities have adopted Plans setting out housing requirements (and in the case of Chelmsford, how these will be delivered). However, for all three, housing requirements were established through NPPF 2012 Plans, as opposed to current national policy.
- 2.17 Braintree's local housing need (as per the Standard Method) is less per annum than that in the adopted Development Plan (for 2021-2033, at least). However, and more importantly, the number of homes currently planned for the HMA as a whole falls short of meeting total needs for the HMA as per the Standard Method.
- 2.18 The adopted housing position versus the projected supply in the adopted Development Plan (or adopted target, in the case of Colchester and Tendring, where elements of the Development Plan that will establish projected supply are still being examined) is set out below. It shows that, unless there is an uplift within the housing supplies of Braintree,

Colchester and / or Tendring against their minimum adopted targets, there will be a significant shortfall for the HMA as a whole in relation to current local housing needs.

LPA	Adopted Development Plan		Local housing need ³ (dpa)	Adopted target / supply against local housing need (dpa)
	Housing Target (dpa)	Projected supply (dpa)		
Braintree	716	-	788	-72
Chelmsford	805	950	885	65
Colchester	920	-	1,061	-141
Tendring	550	-	861	-311
TOTAL	3,136		3,595	-459

Table 1 – Housing targets / projected supply versus local housing need

2.19 Notably, the 18% headroom provided by the Chelmsford Local Plan above its minimum requirement at the time the Plan was prepared, has imbued the strategy with sufficient flexibility such that it still has potential to meet its current local housing need.

Unmet needs in other areas

2.20 There is a strong relationship between Braintree and both the South Essex housing market area, and Greater London.

2.21 Housing market assessment for South Essex⁴ identified that of those migrating out of Southend-on-Sea, Braintree was the third most common destination. Braintree was also the third most common destination for out migrants from Rochford District (also within the South Essex HMA).

2.22 The South Essex HMA is heavily constrained by Green Belt, which severely restricts opportunities for growth in all authorities within this area. The HMA has one of the worst housing delivery records of any in the country: three of the five authorities which comprise the HMA were amongst the ten worst performing authorities in the country in the HDT 2020 measurements.

2.23 There is a strong probability that the significant under delivery within this HMA will result in additional pressure on Braintree's HMA.

2.24 The Braintree District Strategic Housing Market Assessment (2014)⁵ also considered internal migration levels, and identified significant levels of internal migration between

³ Standard Method, average annual projected household increase 2021-2031, and use of 2020 affordability ratios (published 2021)

⁴ Thames Gateway South Essex Fundamental Review of Strategic Housing Market Assessment Review 2013 (https://www.southend.gov.uk/downloads/file/500/thames_gateway_south_essex_strategic_housing_market_assessment)

⁵ Available via <https://www.braintree.gov.uk/downloads/file/3120/bdc011-strategic-housing-market-assessment-shma-2014>

Braintree and Greater London, with the balance very much skewed towards those moving from Greater London to Braintree. Movements from Greater London to the District represented the second largest contribution to in migration into Braintree, second to Chelmsford.

- 2.25 Greater London evidently has a vast unmet housing need, and one that the emerging London Plan suggests it will fall significantly short of meeting in full. Additional pressure on neighbouring HMAs is inevitable, and already high levels of out migration into areas such as Braintree are likely to increase.

Potential changing patterns in housing demand as a result of current pandemic

- 2.26 The longer term impact on housing demand resulting from the Covid-19 pandemic has yet to be realised. However, early indications are that there has already been an increased desire to move from more to less urban areas, driven by what has been dubbed the 'race for space' – the desire for homes with larger garden areas and home offices, better access to open space, and within less densely populated areas.
- 2.27 At the same time, the situation has forced many employers (although not within all sectors) to adapt and enable home-working. Whilst it is largely anticipated that there will be a degree of return to office-working, it is expected that the need for employees to be physically present within a particular office will be substantially reduced. As a consequence, it is anticipated that many more people will be prepared to live considerably further from their place of work. This is of particular relevance to Braintree, as a) London is accessible via railway services from parts of the District; and b) such accessibility is not as strong as other, more expensive, areas of Essex (particularly South and West Essex) – areas which were likely to be more appealing to London commuters pre-pandemic.
- 2.28 Given the existing relationship between Braintree and Greater London and South Essex, changing geographies as a result of the pandemic may well increase out migration from such areas to Braintree. Whilst the degree of such impact is unknown, this is an example of a known issue, the impact of which has yet to be quantified. Ensuring provision of sufficient flexibility within the strategy for meeting development needs can help address this uncertainty.

Robustness of TP2 housing trajectory

- 2.29 The trajectory provided in TP2 suggests that LPS2 will deliver 14,367 dwellings. However, we have a number of concerns both in terms of whether dwellings will be delivered as quickly as the TP2 trajectory suggests, and whether the total number of dwellings projected will be delivered within the plan period.
- 2.30 Such concerns are set out in Appendix A to this Hearing Statement. In summary, issues include what we consider to be a flawed approach to considering lead-in times, alongside overly optimistic delivery rates.
- 2.31 In particular, we note that one site (Land East of Great Notley Strategic Growth Location), is assumed to deliver at a very high rate of 195dpa, and to sustain this rate for 8 consecutive years. This takes no account of potential market fluctuations. In addition, the TP2 trajectory assumes the site will deliver dwelling completions from 2023/24, whereas a more realistic estimate would be from 2028/29. Revising the first year for completions to 2028/29 for this site would result in 970 dwellings in total being removed from the plan period supply, and 465 deleted from the projected five-year supply; and reduce the total projected plan period housing delivery to 14,802 – a headroom of just 482 dwellings above the minimum requirement.
- 2.32 We note the Council's suggestion (paragraph 3.8, TP2) that a stepped trajectory could be used to address issues with the current trajectory. We consider such an approach would be wholly inappropriate, and would simply delay much needed housing being delivered, contrary to the NPPF. A stepped trajectory would simply present the illusion that housing needs were being met, when in reality they would not be.

Windfall

- 2.33 The contribution relied upon by the TP2 trajectory from windfall totals 750 dwellings, and makes up a substantial element of the total projected supply 2023-2033. Of the 9,304 dwellings TP2 projects will be delivered 2023-2033, 750 (8%) are from windfall. S78 appeals have cautioned against placing significant reliance on windfall contributions to meet housing needs⁶.
- 2.34 By its very nature, the contribution from windfall is uncertain. The greater the contribution relied upon from such source, the greater the risk that needs will not be met.
- 2.35 If the windfall contribution were to be discounted, the remaining total supply 2013-2033 without any other adjustment to the TP2 trajectory would be reduced to 15,022 – providing a headroom of just 702.

⁶ See, for example, appeal reference APP/N2739/W/16/3144900 Land at Hodgson's Gate, East of Hodgson's Lane, Sherburn in Elmet, Selby. Decision date: 06 December 2016

2.36 Indicative of the precarious nature of the housing land supply, as proposed by LPS2, if one were to apply the national average lead-in time to the Land East of Great Notley Strategic Growth Location, and to discount the windfall contribution, the LPS2 would already fail to meet development needs in full. This is of course in a scenario where every other site is delivered as TP2 currently projects, and without critical review of assumptions applied to other sites.

Mitigating factors identified in TP2

2.37 TP2 sets out the following mitigating factors in relation to reduced housing land supply headroom:

- Additional sites added to the trajectory since the LPS2 submission draft.
- The housing target has not changed.
- Review of the Local Plan is likely, immediately upon its adoption.
- There is considerable uncertainty regarding a future housing target, and the current Standard Method suggests a lower target than the plan target for 2021-2033.
- Black Notley Growth Location may deliver more dwellings within the plan period.
- The 2018-based subnational household and population projections indicate a lower housing requirement

2.38 Looking at each of the above in turn:

Additional sites added to the trajectory since 2017

2.39 Such sites are accounted for in the TP2 trajectory, and still the projected delivery only provides limited headroom above the minimum requirement.

The housing target has not changed

2.40 The relevance of this is unclear. A greater headroom was proposed against the same proposed housing requirement in the submitted LPS2. The fact this housing requirement has been confirmed does not provide any greater certainty that sites in the trajectory will be delivered, nor does it negate the need for the strategy for meeting such requirements to be imbued with sufficient flexibility.

Review of the Local Plan is likely, immediately upon its adoption

2.41 An immediate / early review of a Local Plan does not negate the need for a Plan to be sound.

2.42 In any case, there is nothing within the LPS2 which commits the Council to an immediate review.

Standard Method suggests a lower target than the plan target for 2021-2033, and uncertainty regarding future needs

- 2.43 Whilst the Standard Method suggests a lower dpa requirement than the LPS2 for the period 2021-2033, it is important to remember that Braintree is not an island. Rather, it forms part of a wider HMA, which includes Chelmsford, Colchester and Tendring. As set out within this Hearing Statement, the proposed delivery within the HMA as a whole is currently significantly below the minimum housing requirement suggested by the Standard Method.

Black Notley Growth Location may deliver more dwellings within the plan period

- 2.44 Assuming this is reference to the Land East of Great Notley Strategic Growth Location, we consider the TP2 already assumes a very short lead-in time for delivery of this site. It would be wholly inappropriate to rely on an even quicker delivery.

The 2018-based SNHP and SNPP projections indicate a lower housing requirement

- 2.45 There are well established concerns with the use of the 2018-based SNHP to determine future housing requirements, which render them inappropriate for use in planning. An overview of these is provided as **Appendix B**. In summary, the 2018-based SNHP are likely to substantially understate actual housing need in Braintree, rendering them wholly inappropriate to rely on for the purposes of planning.

Overview

- 2.46 We consider that there is a lack of robust evidence to demonstrate that the LPS2 will meet housing needs in full.
- 2.47 In particular, as currently proposed, the LPS2 manifestly lacks the requisite flexibility to be able to adjust to rapidly changing circumstances and still ensure development needs are met. On the contrary, the TP2 trajectory suggests the LPS2's strategy for meeting housing need is very vulnerable to foreseeable circumstances that can be readily anticipated.
- 2.48 A key issues is the lack of headroom above the minimum housing requirement the LPS2 currently provides.
- 2.49 Until this issue is addressed through main modifications, we do not consider the LPS2 strategy can be considered to be appropriate, let alone the most appropriate strategy, as the NPPF requires. Such modifications should substantially increase the housing land supply headroom relative to the minimum requirement, by allocating additional land for residential development.

2,997 words

Commentary on Housing Trajectory provided within Braintree Local Plan Examination Topic Paper 2

1. This statement has been prepared by Strutt & Parker on behalf of Pigeon Investment Management Ltd and M Scott Properties Ltd. It provides commentary on the housing supply trajectory set out within Braintree Local Plan Examination Topic Paper 2 (TP2).
2. It does not provide a detailed site-by-site review of the trajectory, but instead considers the overarching approach and robustness of the purported supply position.

Delivery Rates

3. Lichfields published an updated study of the time that it takes for sites to deliver dwelling completions in early 2020: *Start to Finish: What factors affect the build-out rates of large scale housing sites, Second Edition* (February 2020) ('Start to Finish 2'). This provided an update to the 2016 study published by Lichfields.
4. Start to Finish 2 identified the following average dpa delivery rates for sites by site size:

Site size (dwellings)	Average delivery rate (dpa)
50-99	22
100-499	55
500-999	68
1,000-1,499	107
1,500-1,999	120
2,000+	160

Table 1 – National average delivery rates from Start to Finish 2 (Lichfields) (2020)

5. In terms of how the above compare to the rates in TP2, this is shown in Table 2 below:

Site size (dwellings)	Average delivery rate (dpa)	TP2 average (dpa)*
50-99	22	31
100-499	55	61
500-999	68	84
1,000-1,499	107	100
1,500-1,999	120	195
2,000+	160	-

Table 2 – National average delivery rates from Start to Finish 2 (Lichfields) (2020) compared with delivery rates in TP2 trajectory

*For sites 100+ dwellings, excludes first and last year of each site's projected contribution, as these can distort averages particularly on larger sites

6. It is clear that in almost every site-size category, the TP2 trajectory assumes a greater than national average delivery rate. In some cases, significantly so. Whilst these rates may be possible, we consider that if a strategy were to rely upon such an approach to meet development needs, this would present a risk.
7. We also consider that the TP2 trajectory takes a very optimistic approach in terms of the ability of sites to deliver at particular high rates over a sustained period of time.
8. For example, in the case of the Land East of Great Notley Strategic Growth Location, TP2 assumes it will consistently deliver at a high rate of 195dpa, and sustain this rate for 8 consecutive years. Whilst such delivery is not necessarily impossible, we would caution against a strategy that relies on such a high level of build-out.
9. In particular, the projected delivery rate does not account for potential fluctuations in market conditions, which are likely to occur over the course of the plan period. Again, the result is a trajectory that is highly optimistic.

Lead-in times

10. TP2 Appendix 4 reports the lead-in times for recent developments in the District.
11. However, the lead-in times in TP2 Appendix 4e overlook a crucial component: the planning approval period¹. We have reviewed the sites considered in TP2 Appendix 4, and accounting for this important component of lead-in times, provided revised figures for these sites. This is set out in Table 5 at the end of this statement.
12. In summary, once the planning approval process is taken into account, typical lead-in times within the District are vastly greater than TP2 Appendix 4 implies. Averages of the sites considered by TP2 Appendix 4 are set out below:

Site size (dwellings)	Average lead-in time (months)
0-99	39
100-199	36
200-299	35
300-399	47
400+	38
All site sizes	38

Table 3 – Average lead-in times for TP2 Appendix 4 sites, accounting for planning approval period

¹ The period of time between the validation date of the first planning application made for the proposed development, and the time the first detailed planning application for development is approved.

13. Separately, the sample size for sites of 400+ dwellings is a single site. In such circumstances, we consider it would be prudent to use the national average² lead in times, which are as follows:

Site size (dwellings)	Average planning approval period (years)	Average planning to delivery period (years)	Average total lead-in times (years)
100-499	2.1	1.9	4.0
500-999	3.3	1.7	5.0
1,000-1,499	4.6	2.3	6.9
1,500-1,999	5.3	1.7	7.0
2,000+	6.1	2.3	8.4

Table 4 – National average lead-in times for residential developments

14. Furthermore, the data presented in TP2 Appendix 4 (and even in Table 3) paints a somewhat distorted picture, in that it only includes sites that have successfully progressed through the planning approval process and on which completions have begun.
15. We are aware of other sites in the District where the principle of development has been secured for some years now, but development has yet to commence, as yet to progress through the planning approval process. Examples of such sites are set out in Table 5.
16. Having regard to all of the above, we do not consider the TP2 trajectory is robust. It risks significantly overestimating how quickly sites can come forward. In respect of Land East of Great Notley Strategic Growth Location, accounting for potential lead-in times, we suggest it would be prudent to avoid assuming contributions to the housing supply from the site until 2028/29. This would account for a 7-year lead-in time – the average for a site of this size, but would assume an application is made this year. In the case where an application is not made, it would be appropriate to push back the estimated first year of completions.
17. Assuming no change to TP2's projected delivery rate, completions from 2028/29 would result in 970 fewer homes being delivered within the plan period.

² As per *Start to Finish: What factors affect the build-out rates of large scale housing sites, Second Edition* (February 2020)

Table 5 – TP2 Appendix 4 Sites with planning approval period incorporated into lead-in times (site in italics have yet to deliver dwelling as of June 2021). Based on information available via the Council's online system.

Site	Total Dwelling Capacity	Date of validation of first application	Date of first completions	Lead-in time
Site Size 0-99 dwellings				
WJC Hospital site Braintree	29	November 2011	November 2014	36 months
Land at Braintree Road Great Bardfield	37	November 2015	August 2019	45 months
Land at Monks Road, Earls Colne	50	August 2016	March 2019	31 months
Sorrells Field Hatfield Peverel	50	April 2015	January 2021	69 months
Land NE of Station Road, Earls Colne	56	July 2015	March 2020	56 months
Land south of Rickstones Road	58	October 2017	February 2021	40 months
Land East Of Boars Tye Road Silver End Essex	59	October 2016	December 2018	26 months
Former PG Bones Builders Yard Station Approach Braintree	64	March 2009	July 2012	40 months
Land south of Mill Road Braintree	74	December 2013	August 2015	20 months
Harvard Place Station Road Earls Colne	90	February 2018	December 2020	34 months
Constance Close Witham	94	March 2010	April 2014	49 months
Bakers Lane, London Road, Black Notely	96	April 2016	October 2017	18 months
<i>Land South of the Limes, Gosfield</i>	19	<i>April 2017</i>	<i>N/A</i>	<i>N/A (Currently 50 months since validation of application)</i>

Site	Total Dwelling Capacity	Date of validation of first application	Date of first completions	Lead-in time
Site Size 100-199 dwellings				
Portway Place Halstead	103	October 2015	April 2018	27 months
Avondale Mill Lane Crossing	118	March 2016	January 2019	34 months
Rayne Gardens Braintree	127	November 2015	April 2018	29 months
Hatfield Grove Hatfield Peverel	145	January 2017	December 2020	47 months
Former Premdor Engineering Work Sible Hedingham	193	January 2013	November 2014	22 months
Inworth Road Feering	162	March 2016	February 2021	59 months
Site Size 200-299 dwellings				
Land at London Road Braintree (Pods Brook)	215	September 2015	July 2019	46 months
Land east of Sudbury Road Halstead	218	March 2017	June 2020	39 months
Phase 1 Oak Road Halstead	283	January 2015	September 2016	20 months
Phase 2 Oak Road Halstead				
<i>Land West Of Kelvedon Station Station Road Kelvedon</i>	250	<i>March 2017</i>	-	<i>N/A (Currently 51 months since validation of application)</i>
<i>Land Adjacent To Braintree Road Crossing Essex</i>	225	<i>December 2016</i>	-	<i>N/A (Currently 54 months since validation of application)</i>
Site Size 300-399 dwellings				
Western Road Silver End	350	March 2015	September 2020	65 months

Site	Total Dwelling Capacity	Date of validation of first application	Date of first completions	Lead-in time
Forest Road NE Witham	385	June 2015	October 2017	28 months
<i>Land North of Colchester Road, Coggeshall</i>	300	<i>December 2017</i>	-	<i>N/A (currently 42 months since validation of application)</i>
Site Size 400+				
Lodge Farm	750	April 2015	June 2018	38 months

Use of 2018-based SNHP to calculate housing need

Introduction

1. This statement has been prepared by Strutt & Parker on behalf of Pigeon Investment Management Ltd and M Scott Properties Ltd to accompany submissions made to the Braintree Local Plan Section 2 Examination.
2. Specifically it considers the use of the 2018 subnational household projections (SNHP) to determine future housing needs, for the purposes of planning.

The 2018-based SNHP

3. There are well established and acknowledged concerns with the use of the 2016-based SNHP to determine future housing needs.
4. As the ONS stated at Point 5 of its Methodology used to produce household projections:

“There was a view that only using the 2001 and 2011 Censuses would result in a downward trend in household formation for the younger age groups, which in turn would downplay the need for housing for younger people”.

5. The primary criticism of the 2016-based projections was they used just two points (2001 and 2011) to project headship rates up to 2021, after which they are assumed to be constant (previous projections drew upon data going back to 1971). The period 2001 – 2011 of course saw very low levels of housebuilding, and a dramatic worsening of affordability. This resulted in a substantial increase in concealed families, and an increasing number of young adults not leaving their parents’ home. As such, there were significant concerns that this suppressed the household formation rates used in the 2016-based SNHP, particularly within the 25-44 age cohort, resulting in the projections understating actual need. If housing delivery were to be based on projections calculated in this way, there would be a danger that these projections based on concealed households and adults remaining living with parents would, in effect, become a self-fulfilling prophecy.
6. The issue of the 2016-based projections understating the extent of household growth resulted in the Government confirming they should not be used to calculate housing requirements through the Standard Method which forms part of current national policy.
7. The 2018-based SNHP are subject to similar – and additional – concerns to the 2016-based 2016-SNHP insofar as their appropriateness for use in determining future housing needs.
8. As with the 2016-based SNHP, the 2018-based SNHP again only used two points (2001 and 2011) to project headship rates up to 2021, after which they are assumed to be constant. As

such, they are subject to the same concerns that rendered the 2016-based SNHP unsuitable for use in estimating future housing needs.

9. In addition, a period of just two years was used to consider internal migration trends (2016-2018). In Braintree, this period and that leading up to it, saw a sustained period of housing under provision. In such circumstances, it is probable that in migration would have been constrained by lack of availability of housing. This would then further suppress projections of future growth in the District.
10. Notably, current Government guidance remains that the 2014-based SNHP be used in the Standard Method for calculating local housing need.
11. In overview, the 2018-based SNHP are likely to substantially understate actual housing need in Braintree. It would be wholly inappropriate for any strategy to rely on these, or to seek to justify its approach based on such projections.