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**Braintree, Colchester and Tendring Section 1 Local Plan Examination**

**Examination Hearing Statement – Matter 3: Meeting Housing Needs**

Prepared by Strutt & Parker on behalf of City & Country (ID: LPPuD264, LPPuD291) and M. Scott Properties (ID: LPPuD293, LPPuD294)

December 2017

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## **North Essex Section 1 Local Plan Examination**

### **Hearing Statement**

#### **Matter 3: Meeting housing needs**

This Hearing Statement has been produced by Strutt and Parker on behalf of our clients City & Country and M. Scott Properties on whose behalf we submitted representations on the Regulation 19 Draft Local Plan. The contents of this Hearing Statement seek to supplement our representations and, as per the Inspector's instructions, we have endeavoured to avoid repeating points already made within our previous submissions.

**2. Are the proposed overall housing requirement in policy SP3 of 43,720 dwellings (2,186dpa), and the constituent requirement figures of 14,320 (716dpa) for Braintree, 18,400 (920dpa) for Colchester and 11,000 (550dpa) for Tendring, based on a sound analysis of the available and relevant evidence, and do they reflect the full, objectively-assessed need for housing over the period 2013-2033?**

We have substantial concerns in respect of the proposed overall housing requirement for the three authorities through Policy SP3; and in particular in relation to the approach taken to determining objectively assessed need for Tendring District.

Our concerns, without repeating the points we raised in our representations at the Regulation 19 consultation stage, are set out below.

**a) Is the PBA Study justified in using a baseline household growth figure of 445dpa for Tendring, rather than using the 625dpa figure from the 2014-based DCLG household projections?**

We set out concerns in respect of the Council's decision to disregard DCLG household projections within our Regulation 19 representations.

Since our Regulation 19 representation, the issue of Tendring District Council's approach to determining objectively assessed housing need has been explored through a Section 78 appeal in respect of Land north west of Sladbury's Lane, Clacton (Appeal Ref: APP/P1560/W/17/3169220).

It should be noted that as part of the inquiry into the Sladbury's Lane, Clacton appeal (Appeal Ref: APP/P1560/W/17/3169220) the Council presented additional evidence in respect of its approach to objectively assessed housing need. This sought to address the issue of Unattributable Population Change (UPC), which the Council cites as justification for its decision not to use official household projections.

The Council's evidence submitted as part of this appeal included that provided by an independent adviser and commentator on housing demographics, Neil McDonald. A copy of the proof of evidence submitted by Mr McDonald is provided as **Appendix 1** to this statement. Within this proof of evidence, uncertainties in respect of the causes of UPC are confirmed and reaffirmed at paragraphs 14 and 20.

The proof of evidence (paragraph 30) suggests a range for the baseline household growth figure for Tendring District, dependent on the proportion of the UPC that is due to errors in migration flows. The figures in paragraph 30 range from 420 to 540 dwellings per annum as a starting point (i.e. before consideration of market factors). The smaller the proportion of the discrepancy due to migration error, the larger the baseline housing growth figure.

Separately, it is understood that ONS has looked into the issue of UPC in Tendring in some detail and has produced a note discussing the matter. This note was provided as evidence at the Sladbury's Lane appeal, and is appended again here (**Appendix 2**).

Within this note produced by the ONS, they assert that the discrepancy due to migration is likely to be – at most – 5,000 to 6,000 dwellings (with the remainder due to Census errors). The total discrepancy is 10,533. 5,000 – 6,000 of the discrepancy equates to 47-57% of the total, i.e. the ONS' view is that *at most* 47-57% of the discrepancy is due to migration errors.

This results in a baseline household growth figure of 483-510 dwellings per annum, as established through the Sladbury Lane appeal (see paragraph 29 of the Appeal Decision). However, it should be emphasised that this is a minimum. ONS has confirmed that the discrepancy is at most 47% - 57%. If in reality the proportion of the discrepancy due to migration error were to be less than 47% (as can be inferred from ONS' view is a distinct possibility), then the baseline household growth figure is greater than 510 dwellings per annum.

Having regard to the above, there are substantial doubts as to whether a baseline household growth figure of 445dpa is justified.

On 30th November 2017 ONS updated its Uncertainty Estimates, and included data relating to the 2016 MYEs. Tendring's figures have been revised downwards slightly, suggesting that the level of certainty regarding Tendring's Mid-Year Estimates post 2011 is even higher than the ONS had previously concluded. Furthermore, only 3 authorities in England and Wales have a lower level of uncertainty regarding their 2016 MYEs than Tendring District's figure of 0.62. This suggests that ONS considers that the certainty that can be attached to Tendring's MYE post 2011 is very high when compared to other Districts nationally.

In addition, the approach to identifying the quantum of homes which the Local Plan will seek to deliver in Tendring should not be viewed in isolation from the purposes of determining need: the NPPF is clear that Local Planning Authorities "should have a clear understanding of housing needs in their area" (paragraph 159); should "use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area" (paragraph 47); with the aiming of seeking to "boost significantly the supply of housing" (paragraph 47).

In light of the above, and having regard to the uncertainty surrounding the causes of UPC, it is particularly disconcerting that Tendring District Council is seeking to use a baseline housing growth figure that is well below the level of need suggested by official projections.

It is also very relevant to note that the Council's justification for departing from official projections is UPC, and the Local Plan Expert Group have expressly advised the Government that it should *not* be open for plan-makers to reject the use of official projections due to perceived concerns with UPC.

Such a recommendation is entirely logical: Tendring is not an island; Government guidance is clear that individual authorities should not examine their housing need in isolation; and if internal out migration is greater than officially projected – and official projections are wrong – then Tendring's housing need has not vanished, but has simply been displaced (the most logical conclusion, assuming the housing market has been correctly identified, is that it has been displaced to elsewhere within the housing market area, i.e. Braintree District and / or Colchester Borough).

The Government clearly has concerns with how some Local Planning Authorities are using unorthodox approaches to calculate need. It was noted within the White Paper published by the Government in

February 2017 ('Fixing our broken housing market') that: "some local authorities can duck potentially difficult decisions, because they are free to come up with their own methodology".

Further to the publication of this White Paper, the Government published proposals to reform the planning system to increase the supply of new homes and increase local authority capacity to manage growth within 'Planning for the right homes in the right places'. This includes proposals to introduce a standard methodology for calculating housing need. The consultation document makes very clear that: the Government will be introducing a standardised methodology for Local Authorities to use to calculate their housing needs; that the approach will utilise official projections as a starting point, which will then be adjusted for market signals; and that the Government expects there to be very limited grounds for adopting an alternative approach which would result in a lower need than the proposed method (as Tendring District's current approach does). This clearly identifies the direction of travel for housing need within this market area and particularly in Tendring District. The aforementioned should be seen within the context of their being substantial uncertainty in respect of the approach currently being undertaken by Tendring District Council.

**3) Should the Section 1 Plan make provision for higher or lower housing requirement figures, and if so, what is the justification for the alternative figures?**

In addition to the comments set out within our Regulation 19 representations (which included a robust assessment of the District's objectively assessed housing need undertaken by Lichfields which identified a housing need for Tendring District of between 761 and 775 dwellings per annum), we have the following to add at this stage.

It should be noted that as part of the Statement of Common Ground which was produced by the appellant and the Council for the Section 78 appeal in respect of Land north west of Sladbury's Lane, Clacton (Appeal Ref: APP/P1560/W/17/3169220), the Council confirmed it was confident how the figure of 550 dwellings per annum was derived:

"The Council's calculation of 550 dwellings per annum as the objectively assessed housing need is derived from the mid-point of the range of 500-600 dwellings identified in the January 2016 Objectively Assessed Housing Needs Study (produced by Peter Brett Associates), which the July 2017 Objectively Assessed Housing Needs Study update (again by PBA) suggested remain unchanged."

The relevant extract from this Statement of Common Ground is provided as **Appendix 3** to this statement.

It is considered that, even if Tendring District's approach to calculating housing need is found to be sound (and we submit it is not) then the Council's approach to the findings is not. In the event that a housing need range is identified is not considered justified nor consistent with national planning policy to simply opt to utilise the mid-point of the range. The NPPF is clear that housing needs should be met in *full*.

In the event that a range of 500-600 dwellings per annum is calculated, the Local Plan should seek to deliver a minimum of 600 dwellings per annum as a starting point.

Failure to do so would entail a substantial risk that actual housing needs were not being met. Such an approach is particularly problematic given the need to significantly boost housing land supply, and the Council's persistent failure to meet housing need in recent years. If the Local Plan were to utilise a mid-point within the identified needs range, there is a very real risk that not only would the District's housing supply shortage fail to be addressed, but that the shortage would be exacerbated. This would result in significant negative social and economic impacts for the District.

Conversely, if the Local Plan were to propose a number of dwellings which were to exceed housing need, this would not engender social or economic harm, and would still accord with national policy. The Council has not provided any evidence to suggest that the delivery of 600 dwellings per annum in the District would be unsustainable. In short, the only risk is that the Local Plan underestimates housing need and as such, a cautious approach where there is uncertainty would be to utilise the higher figures calculated.

As such, if the approach taken to calculating Tendring District's housing need is found to be sound, then the Local Plan should seek to deliver a minimum of 600 dwellings per year in the District in order to meet need.

In respect of all three authorities, it is noted that the Government's proposed standardised methodology to calculating housing need would result in a greater need than currently proposed to be planned for, as illustrated below:

	<b>Dwellings proposed through Policy SP3</b>	<b>Housing need based on proposed standardised approach</b>
<b>Braintree District</b>	716 dpa	835 dpa
<b>Colchester Borough</b>	920 dpa	1095 dpa
<b>Tendring</b>	550 dpa	749 dpa
<b>TOTAL</b>	2,186 dpa	2,679 dpa

Policy SP3 proposes to deliver nearly 500 fewer homes per year than the proposed standardised methodology suggests is needed. Clearly this would result in a substantial unmet housing need within the sub-region, with resultant significant negative social and economic impacts.

Whilst it is acknowledged that the standardised methodology was published for consultation after the Regulation 19 iteration of the Section 1 Local Plan had been published, this does illustrate that the proposed approach to housing delivery lacks sufficient flexibility to respond to rapid change, as per the requirements of paragraph 14 of the NPPF.

The approach contrasts with other authorities, whose approach does seek to provide flexibility. For example, neighbouring Chelmsford City Council identified a housing need of 805 dwellings per annum (prior to the publication of the standardised methodology). Recognising the need to ensure flexibility and to help significantly boost housing land supply, the Chelmsford Local Plan Preferred Options (May 2017) proposed to provide capacity for an additional 20% on top of this need. It is unclear why a similar approach could not be undertaken in the case of Braintree, Colchester and Tendring.

As a further example of the need for an uplift, Tendring District Council has only delivered 26 affordable dwellings in the past 3 years, for which data is available, out of a total of 716 housing completions – a rate of just 3.6%. In order to increase the delivery of affordable homes, it is suggested that there should be an uplift in housing delivery.

Indeed, it is particularly notable that at the Regulation 18 stage in the preparation of the Local Plan, Policy SP2 (Meeting Housing Needs) of the Draft Local Plan (2016) proposed 845 dwellings per annum be provided in Braintree District (reflecting what was at that time the identified objectively assessed need, and which closely reflects what the standardised methodology suggests is the need). This figure was tested through Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) as

required. The SA/SEA (relevant extract provided as **Appendix 4**) did not report any negative impacts for this level of provision, and identified a number of positive effects. Full comment regarding housing supply in the Braintree District is provided in our initial representations.

We trust that the above is useful in relation to the forthcoming examination.





**Proof of Evidence by Neil McDonald**  
**NM Strategic Solutions Ltd**  
**on behalf of Tendring District Council**

**Appeal by Mr R Giles**  
**against refusal of Planning Permission on**  
**Land North-West of Sladbury's Lane, Clacton-On-Sea, Essex**

**July 2017**

**Planning Inspectorate Ref. APP/P1560/W/17/3169220**

**Local Authority Ref. 15/01351/OUT**

## PROOF OF EVIDENCE

### Expertise in housing demographics

1. My name is Neil McDonald. I have a BA degree in Natural Sciences from Cambridge University. I am an independent adviser and commentator on housing demographics, working with local authorities and others on the estimation of housing need and related issues. I have appeared as an expert witness at both local plan examinations and S78 appeal hearings.
2. I was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. My seven years as a Director included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit until its closure in 2010. I left the Department in March 2011 and have since worked with the Cambridge Centre for Housing and Planning Research (CCHPR) as a Visiting Fellow (2012-15), collaborating in particular with its founder director, Professor Christine Whitehead.
3. My recent publications include:
  - New Estimates of Housing Requirements in England, 2012 to 2037 (November 2015)<sup>1</sup>
  - Making Sense of the New English Household Projections<sup>2</sup> (April 2015)
  - Planning for Housing: Understanding recent changes in household formation rates and their implication for planning for housing in England<sup>3</sup> (January 2014)

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<sup>1</sup> New Estimates of Housing Requirements in England, 2012 to 2037, Neil McDonald and Christine Whitehead, TCPA, November 2015. See: <http://www.tcpa.org.uk/pages/new-estimates-of-housing-requirements-in-england-2012-2037.html>

<sup>2</sup> Making sense of the New English Household Projections, Ludi Simpson and Neil McDonald, Town and Country Planning, April 2015. Available from the TCPA at <http://www.tcpa.org.uk/pages/our-journal.html> Ludi Simpson is Professor of Demographics and the University of Manchester.

<sup>3</sup> Planning for housing in England: Understanding recent changes in household formation rates and their implications for planning for housing in England, RTPI Research Report no.1 January 2014, Neil McDonald and

- Choice of Assumptions in Forecasting Housing Requirements: Methodological Notes<sup>4</sup> (March 2013)
- “What Homes Where?” an Excel-based tool that provides easy access to the key official datasets for planning for housing<sup>5</sup>

## Purpose and Structure of Evidence

4. This proof responds to the proof of evidence submitted by Samuel Hollingworth of Strutt and Parker dated July 2017. In that proof Mr Hollingworth draws attention to that the Planning Practice Guidance (PPG) statement that the starting point for determining the objectively assessed housing needs (OAN) of an area should be based on the DCLG’s sub-national household projections (the SNHP). He notes that the Council have used a different basis for assessing the District’s OAN and highlights the acknowledgement by the Council’s advisers<sup>6</sup> that that estimate is subject to considerable uncertainty. He then asserts that the most appropriate figure to be used in planning decisions is one based on the 2014-based SNHP. However, he offers no evidence to suggest that he has reviewed the 2014 SNHP for Tendring to determine whether it provides a sound basis for planning for housing.
5. In view of the challenges made to the existing evidence base, I have been asked by Tendring District Council to give an independent view on the District’s objectively assessed need for housing.
6. In my proof I will:

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Peter Williams (then Director of the Cambridge Centre for Housing and Planning Research). See [http://www.rtpi.org.uk/media/819060/rtpi\\_research\\_report\\_-\\_planning\\_for\\_housing\\_in\\_england\\_-\\_january\\_2014.pdf](http://www.rtpi.org.uk/media/819060/rtpi_research_report_-_planning_for_housing_in_england_-_january_2014.pdf)

<sup>4</sup> Choice of Assumptions in Forecasting Housing Requirements: Methodological Notes, Cambridge Centre for Housing and Planning Research, edited by Neil McDonald with contributions from Sarah Monk, Alan Holmans, Christine Whitehead and Peter Williams, March 2013. See: [http://www.howmanyhomes.org/resources/Choice\\_of\\_Assumptions.pdf](http://www.howmanyhomes.org/resources/Choice_of_Assumptions.pdf)

<sup>5</sup> See: <http://www.howmanyhomes.org/5.html>

<sup>6</sup> ‘Objectively Assessed Housing Needs Study’ (Updated November 2016) Peter Brett Associates

- Note that the PPG clearly envisages that it may be appropriate in certain circumstances to depart from the household growth figures suggested by the DCLG projections.
- Show that there are very strong reasons for doubting the reliability of the DCLG's household growth projections for Tendring and that it is probable that they exaggerate the likely growth in the number of households.
- Set out alternative projections for household growth in Tendering which are based on adjusting the DCLG's 2014-based projections. These indicate that, when corrections are made for the inaccuracies in the historic migration flow data on which the projections are based, a housing need of 420 to 540 homes a year 2013-37 is indicated.

**The PPG envisages that it may be appropriate to depart from a method based on the latest DCLG household projections**

7. In Paragraph 5 of the section of the PPG on "Housing and economic development needs assessments" addresses directly the question of whether alternative approaches can be used to assess housing need besides the one recommended in the guidance:

***Can local planning authorities use a different methodology?***

*There is no one methodological approach or use of a particular dataset(s) that will provide a definitive assessment of development need. But the use of this standard methodology set out in this guidance is strongly recommended because it will ensure that the assessment findings are transparently prepared. Local planning authorities may consider departing from the methodology, but they should explain why their particular local circumstances have led them to adopt a different approach where this is the case. The assessment should be thorough but proportionate, building where possible on existing information sources outlined within the guidance.*

*Paragraph: 005 Reference ID: 2a-005-20140306*

8. Later on in the same section of the PPG there is discussion of the limitations of the DCLG projections. Paragraph 15 contains the following:

*The household projections are trend based, i.e. they provide the household levels and structures that would result if the assumptions based on previous demographic trends in the population and rates of household formation were to be realised in practice. They do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour.*

*The household projection-based estimate of housing need may require adjustment to reflect factors affecting local demography and household formation rates which are not captured in past trends.*

*Paragraph: 015 Reference ID: 2a-015-20140306*

9. This is discussed further in paragraph 17:

*The household projections produced by the Department for Communities and Local Government are statistically robust and are based on nationally consistent assumptions. However, plan makers may consider sensitivity testing, specific to their local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates. Account should also be taken of the most recent demographic evidence including the latest Office for National Statistics population estimates.*

*Any local changes would need to be clearly explained and justified on the basis of established sources of robust evidence.*

*Paragraph: 017 Reference ID: 2a-017-20140306*

10. The message here is straightforward: the use of the DCLG projections is not mandatory and that where they are used they “may require adjustment”. In line with this there are numerous examples of Inspectors agreeing to adjustments being made to the DCLG projections, including cases in which they have accepted that the figure suggested by the official projections should be reduced to take account of Unattributable Population Change (UPC). A recent example is the Inspector’s report on the Swale Local Plan, extracts from which are at Appendix A.
11. In what follows I will show that the migration trend data for Tendring which has been used in the latest DCLG projections is inaccurate and that as a consequence those projections require adjustment before they can safely be used to assess Tendring’s housing needs.

#### **Evidence that the migration trend data used in the latest DCLG projections is inaccurate**

12. The ONS’s statistics provide two estimates of the change in Tendring’s population between 2001 and 2011.
  - The censuses in 2001 and 2011 provide estimates of the District’s population in those years. Subtracting one estimate from the other gives an estimate of the change in the population.
  - The ONS produces annual statistics for the births and deaths in each district and for the migration flows into and out of each district (from the rest of the UK and abroad). Adding births to migration flows into a district and subtracting deaths and migration flows out of a district gives an estimate of the change in population.
13. In Tendring’s case there is a very large discrepancy between these two estimates: the two censuses suggest that the population of the District **fell by 740** between 2001 and the births, deaths and migration statistics (known collectively as the ‘components of change’) suggest that the population **grew by 9,793**. The **difference is 10,533** or 7.6% of the census-based estimate for 2011. This is discrepancy (referred to as the

‘Unattributable Population Change’ or UPC) is one of the largest of any local authority in England, which indicates that there are substantial problems with the demographic data for the District and that methods that may be perfectly satisfactory in other areas cannot be relied upon in Tendring.

14. In the UK we have rigorous systems for registering births and deaths which produce high quality data. It is therefore highly probable that the discrepancy is due to inaccuracies in either the censuses or in the statistics for the migration flows or both. Whilst we cannot be certain where the inaccuracies lie, we can be sure that they add up to 10,533 people. This implies that any inaccuracies that cannot be accounted for by inaccuracies in the censuses must be due to inaccuracies in the migration flow estimates. In the next section I will show that it is improbable that the more than half of the discrepancy is due to inaccuracies in the censuses and that the proportion might well be less. This implies that at least half of the discrepancy is due to errors in the estimates of migration flows – estimates that have been used to estimate the trends used to produce the DCLG projections.

#### **How large might the inaccuracies be in the census population estimates for Tendring?**

15. There are a number of ways in which it is possible to gauge how large the errors in the census population estimates might be:
  - The ONS’s own estimates of the error margins in the censuses.
  - Views expressed separately by the ONS.
- (a) ONS census error margins**
16. The ONS publishes 95% confidence intervals for its census population data. Ordinarily it would be thought extremely unlikely that the actual figure lies further from the stated figure than these intervals. The figures for Tendring are:
  - 2001: 1.1% i.e. 1,527



- 2011: 0.83% i.e. 1,151

17. If the 2001 figure were too high by its 95% interval and the 2011 figure were too low (a very unlikely situation), the contribution that errors in the censuses would make to discrepancy would be 2,678 or 25% of the discrepancy. This would imply that the error attributable to the migration flows was at least 75% of the total figure.

**(b) Views expressed separately by the ONS**

18. I have discussed the discrepancy with the ONS. It is a case that they have studied in some depth. They believe that around 4,500 of the discrepancy is due to the 2001 census base. Allowing for the possibility that there may be (much smaller) inaccuracies in the 2011 census, this suggests that around half of the discrepancy may be due to the two censuses. That would imply that around half is due to errors in the migration flow estimates.

19. I would note that an over-estimate of 4,500 amounts to 3.2% of the estimated population in 2001. That is a very large error margin for a census: the ONS's published data on the levels of uncertainty in the 2001 census results show that only 2 local authorities outside London were subject to greater uncertainty than this.

20. Two reasons have been suggested for the view that the 2001 census figure may have been over-estimated :

- **A comparison of the census population estimate with GP lists.** Normally GP lists suggest a larger population than the census because of what is known as "list inflation" i.e. more people being registered than are actually resident in an area due GP's not pruning their lists sufficiently. In Tendring's case, list inflation was negative for some age and sex groups in 2001 i.e. the lists were smaller than the census estimate of the population. This suggest that the census population estimates may have been too high. However, the extent of list inflation varies considerably for area to area. If Tendring's list inflation were at the median level for England and Wales that would imply a census error of more than 4,500, but it if were at the lower quartile level the error

would be in the 1,000 - 1,500 range. Given that there are clearly issues with data collection in Tendring, the possibility that GP list inflation was at the lower quartile level or below cannot be ruled out.

- **A comparison with council tax data.** The council tax data for 2011 suggests that there were 63,187 occupied dwellings, 1.7% more than the 62,105 estimated by the census<sup>7</sup>. That kind of difference is to be expected as the definitions used are different. However, in 2001 the council tax data suggested there were 3% fewer occupied dwellings than estimated by the census. If the actual number of occupied households on the census definition in 2001 were the same proportion of the council tax figure as it was in 2011, then the 2001 census would have overestimated the number of occupied dwellings by 1,052. Multiplying that figure by the average number of people per household in 2001 suggests that the 2001 census estimate may have been 2,369 too high – rather less than the 4,500 figure suggested by the ONS.

### **Conclusion on inaccuracies due to census data**

21. Weight should be given to the ONS view that around 4,500 of the discrepancy may be due to the 2001 census. However:
  - this would imply a very large error in the 2001: the actual error may be less as:
    - a comparison with the council tax data suggests that the over-estimate in the 2001 census was significantly less than 4,500
    - the evidence from GL list inflation is open to interpretation.
  - Even if the error in the 2001 census was 4,500 it would only result in more than 50% of the discrepancy being attributable to the two censuses if there was also an error in the 2011 census that was close to the 95% confidence interval and

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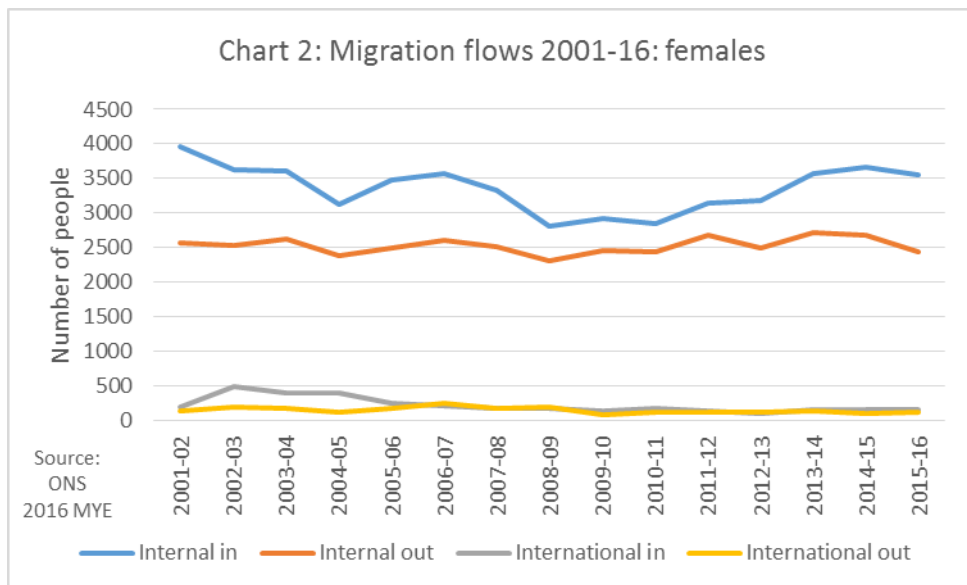
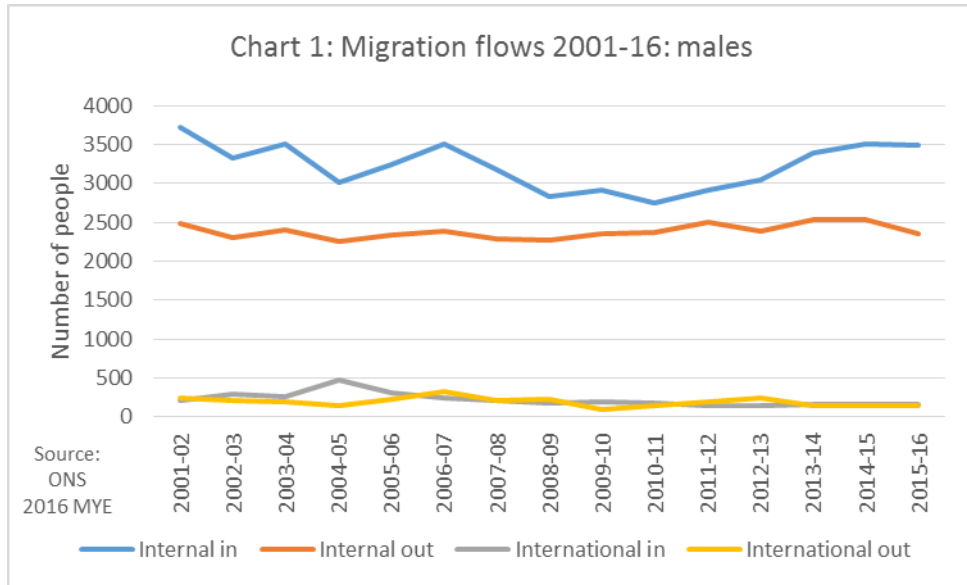
<sup>7</sup> Figures provided by Tendring District Council.

the error was in the right direction (i.e. the census under-estimated the actual figure); and,

It therefore seems improbable that more than half of the discrepancy is attributable to the censuses and entirely possible that the proportion may be less. This implies that at least half of the discrepancy is likely to have been due to errors in the migration data.

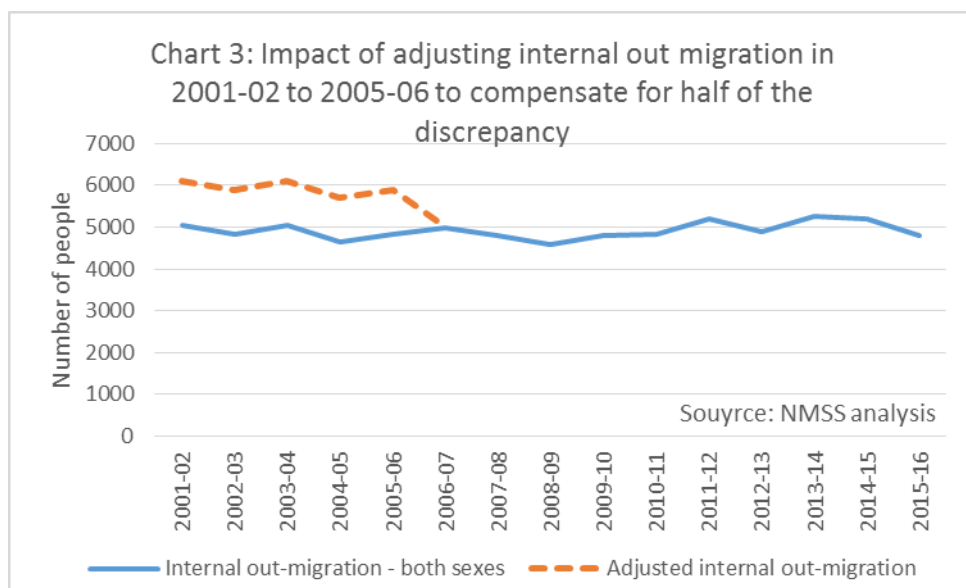
### **Timing of inaccuracies in migration estimates and implications for projections**

22. The 2014-based DCLG household projections are based on the ONS's 2014-based sub-national population projections (2014 SNPP). Those population projections take the 5 years 2009-10 to 2013-14 as their trend period for migration flows within the UK and the 6 years 2008-09 to 2013-14 as their trend period for international migration flows. If the estimates made for flows in these periods were inaccurate the population projections on which the 2014-based DCLG projections are based will also be inaccurate and, as a result, those projections will either under or over-estimate the likely growth in the number of households in Tendring. It is therefore important to understand whether there are likely to have been inaccuracies in the flow estimates during the trend periods.
23. It has been suggested that, as result of methodological improvements made by the ONS, any inaccuracies in the components of change estimates are likely to have been predominantly in the earlier part of the period between the censuses. If this were the case, given the size of the inaccuracies which there must have been in the migration estimates, you would expect the improvement in the statistics to be obvious from the published data. Charts 1 and 2 show the ONS estimates for migration flows into and out of Tendring over the period 2001-16.



24. These charts show that, with the exception of a fairly typical dip in internal migration inflows during the economic downturn, the flows have been remarkable consistent. They do not suggest that there has been a correction in the statistics of the scale required to rectify the inaccuracies that must have existed. For example, to explain half of the discrepancy of 10,533 i.e. around 5,250 over the 10 year period, the average annual error would have been 525 people a year. A correction on that scale would have been obvious in the above charts. This suggests that the inaccuracies were spread relatively evenly over the years between the censuses and appear to have continued since 2011: they were not concentrated in the earlier years and subsequently corrected for.

25. Another way of showing that it is unlikely that the discrepancy was caused by inaccuracies in the data in the early part of the period is to consider what the actual profile of flow would have looked like had this been the case. To do this it is helpful to consider which flow or flows is likely to be responsible for the discrepancy.
26. From Charts 1 and 2 it is clear that the international migration flows are relatively small. This means that there would need to have been very large percentage errors in those flows for them to have made a significant contribution to the discrepancy. That suggests strongly that most of the inaccuracies in the migration flows must have been in the flows to and from the rest of the UK.
27. In terms of the impact on total population figures it makes little difference whether the inaccuracies are in the inflows from the rest of the UK or in the outflows. Chart 3 shows how much higher the actual out-migration flows must have been if an inaccuracy equal to half of the discrepancy had been concentrated in the years 2001-02 to 2005-06 and the data for 2006-07 and subsequent years has been accurate:



28. Bearing in mind how consistent the estimated outflow figures are (even during the period following the recession), it does not seem plausible that the actual figures were so much higher in the early part of the period and then dropped off to the extent shown. This further corroborates the view that the inaccuracies were spread

throughout the period between the censuses and are likely to have continued after 2011.

29. If, as seems probable, internal migration outflows have been under-estimated and the under-estimation has continued beyond 2011, this means that the internal migration outflow rates used in the 2014 SNPP will have been under-estimated, leading to the under-estimation of flows out to the rest of the UK. As a result, the projected increase in the population will have been exaggerated and the DCLG’s 2014’s based household projection will have over-estimated the likely increase in households.

### **Alternative projections for household growth in Tendring**

30. In order to estimate the impact which the inaccuracies in the migration flow data may have had on the DCLG 2014-based household projections I have re-worked those projections for a range of assumptions about the proportion of the discrepancy that is due to errors in the migration flows. The results are in the following table. In each case the lower figure is on the assumption that the errors are in the inflows from the rest of the UK and the higher figure on the assumption that they are in outflows.

<b>Percentage of discrepancy due to migration</b>	<b>Over-estimation in 2001 census</b>	<b>Homes needed a year 2013-37</b>
<b>40%</b>	<b>5900</b>	<b>510 - 540</b>
<b>50%</b>	<b>4900</b>	<b>470 - 500</b>
<b>60%</b>	<b>3900</b>	<b>420 - 470</b>

The figures in the table range from 420 to 540 homes a year. They can be compared with the 2014-based DCLG projection suggests 625 households a year. That equates to 670 homes a year if it is assumed that 6.57% of homes are vacant or used as second homes. Even allowing for the fact that different assumptions would have produced different figures, this analysis suggests strongly that the 2014-based projections are over-estimating household growth by a substantial margin.

31. I would note that the alternative projections have been produced by adjusting the DCLG projections as envisaged in the PPG.

32. I would also note that my results are consistent with the entirely separate analysis carried out for the Council of a different basis which concluded that 480 homes a year was a “sound demographic starting point” and that that figure should be uplifted to 550 homes a year to help accommodate affordable housing need and allow for uncertainty.

## **Conclusions**

33. The Government’s Planning Practice Guidance explicitly recognises that alternative methods can be used to estimate a district’s housing needs and that, where the DCLG projections are used, it may be necessary to adjust them to provide a sound basis for planning for housing.
34. The massive difference (10,533 people) between the estimate of the population growth between 2001 and 2011 indicated by the census data and that suggested by the ONS data for births, deaths and migration flows shows that there are major problems with the population data for Tendring. That on its own should be sufficient to suggest that the household projections may need adjustment as envisaged by the PPG. It also means that it is inappropriate to do as Mr Hollingworth suggests and use the DCLG projections without careful scrutiny.
35. The scale of the discrepancy between the census-based estimates of the population change and the figure calculated from the births, deaths and migration data suggests that is highly unlikely that as much as half of that discrepancy is due to inaccuracies in the census data. That implies that at least half of the discrepancy is in the births, deaths and migration data. As we have good quality data for births and deaths in the UK it is probable that at least half of the discrepancy is due to errors in the migration data.
36. The consistency of the estimates of migration flows in the period between the censuses and the subsequently suggests that it is unlikely that the discrepancy was due to a problem in the early part of the period that has been corrected by subsequent

improvements in ONS methodologies. This means that it is likely that the inaccuracies have affected the trend periods used to construct the population projections on which the latest DCLG household projections are based. As a result those projections are likely to overstate the increase in the number of households.

37. Adjusting the latest household projections to correct for the inaccuracies in the migration flow data suggests a housing need of 420 – 540 homes a year, depending on the assumptions made. Whilst different assumptions would have produced different estimates, the scale and direction of the changes suggest strongly that the DCLG projections have significantly over-estimated the likely increase in the number of households.

Neil McDonald

27 July 2017





## EXTRACTS FROM INSPECTOR'S REPORT ON SWALE LOCAL PLAN



The Planning Inspectorate

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## Report to Swale Borough Council

by Sue Turner BArch MSc MRTPI

an Inspector appointed by the Secretary of State for Communities and Local Government

Date: 20 June 2017

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40. The Swale 2015 SHMA sets out the results of testing of the ONS 2012 SNPP and the CLG 2012 Household Projections, which lead to a requirement for 861 net new homes per annum for the period 2014 – 31. However, it highlights concerns that the five-year trend period may not correctly reflect long term migration into Swale and that the SNPP based figure may be too high due to the failure to adjust for unattributable population change (UPC). It explores a number of alternative projections, using both 5 and 10-year trend periods and 2014 based projections and identifies the 2004-14 trends projection as the preferred scenario. This scenario reflects the GLA's demographic modelling and reflects the level and age profile of inward migration to Swale. The 2015 SHMA proceeds to test this scenario against market signals and future job growth to conclude that the OAN remains at 776 dwellings per annum for the period 2014-2031.
41. Part 2 of the SHMA identifies a net need of 288 affordable dwellings pa, which when refined to meet the local housing market becomes 190 affordable dwellings pa, which is approximately 25% of the OAN. It concludes that this number can be met through the OAN. However, it advises that when setting the affordable housing target, the Council will need to consider the full range of evidence, including viability assessment.
42. The Council's Position Statement (PS/031) explores viability, particularly in the context of differences across the Borough and the proposed variable policy for affordable housing provision. I endorse the Council's conclusions on this matter and agree that an increase in the housing target to improve the rate of affordable housing delivery is unnecessary and in any event would undermine the settlement strategy by requiring an increase above OAN in Faversham and the rural areas.
43. It is argued that the 2015 SHMA has methodological failings, that it proposes a scenario based on inappropriate data and that there is inadequate justification for lowering OAN from the 2012 SNPP figure of 861. Criticism has also been levelled at the inclusion of a UPC adjustment, the allowance for the younger age profile of inward migration and the weight given to supporting employment growth and boosting affordable housing. However having considered all these matters I am satisfied that the report follows a methodical and logical process which is consistent with the NPPG and that its conclusions are robust.

## Thoughts on issues with the population estimates for Tendring between 2001 and 2011

1. Population estimate rolled forward from 2001 was 10,533 higher than the 2011 Census based population estimate; the rolled forward estimates 7.6% higher than the Census based estimate.
2. Assume Births and deaths are fine
3. Assume any negative impact of international migration is low due to there being few international migration moves (5,197 in, 3732 out over the decade, net=1465).
4. Internal migration has a potentially larger impact than the other components due to the volume of moves (65,284 in, 48,404 out, net=16,880). Our traditional view of this has been that areas that gain population over a period are more prone to underestimation than overestimation on the basis that.
  - a. Assuming human behaviour is relatively constant we miss moves at a constant rate both into and out of any location. Rates of missingness will vary by age and sex but should vary little for inflows and outflows.
  - b. On a net inflow we will miss more moves, in absolute terms, on the inflow than the outflow.

For an area like Tendring, with net inward internal migration, we'd probably end up underestimating as a consequence. But, Tendring tends to have net internal migration of relatively well behaved people in their middle/old age, we tend not to miss moves for these age groups as they interact well with GPs.

If we are missing flows out of Tendring, measured primarily via GP registrations it would follow that we must also be missing some flows into Tendring as these are measured via the same method. Given that flows in are in excess of flows out we would expect to miss more flows into Tendring than flows out of Tendring.

5. The relationship between the PR and mid-year estimate/Census in 2001 provides us with two possible avenues for believing that the 2001 Census may have overstated the population – or more accurately - how the 2001 Census and 2001 PR may have lead to overestimation of the 2011 MYE.

The first is relatively obvious; the 2001 Census sits above all of our comparator admin data (mainly the PR and state pension's recipients) for a large number of age groups. The 2001 One Number Census QA pack for Tendring shows this <http://www.ons.gov.uk/ons/guide-method/census/census-2001/data-and-products/quality-of-the-census-data/local-authority-data-quality/england/s-t/tendring-onc-qa-pack.pdf>. The charts at the end of the document show Tendring had an unusual relationship between the PR and the Census in 2001; generally the PR sits above the Census estimates, in Tendring the PR sits below the Census for the majority of age/sex groups above 45. These are the charts I supplied via email previously.

The second is a bit more complicated and is not actually about the 2001 estimate being overestimated. If we imagine that the 2001 census for Tendring was perfect, this means that the patient register is missing large numbers of people. We drive our internal migration estimates using data from the patient register, any moves involving people resident in

Tendring in 2001 (and captured/estimated by the Census) but absent from the 2001 patient register will have been missed. Therefore we will miss outflows from Tendring, and the most likely consequence of this is that we will overestimate the population. I suspect the first case (the Census being overestimated) to be more likely than the second case (the PR understating the population) for Tendring. The second scenario tends to occur in inner London local authorities with very high levels of internal migration for 20-40 year olds who are less likely to interact regularly with GPs.

Further, the 95% confidence intervals give us a range within which we would expect the population estimate to fall 95 times out of 100. 5 times out of 100 the estimates could fall outside of this range. The confidence interval around the Census estimates should not be taken as a guarantee that an estimate is within a particular range. Following the 2001 Census a number of adjustments were made to the mid-year population estimates to account for inaccuracies in the 2001 Census. Some of the issues with the 2001 Census are discussed in this paper <https://www.ons.gov.uk/ons/guide-method/method-quality/specific/population-and-migration/pop-ests/local-authority-population-studies/2001-census---local-authority-population-studies--full-report.pdf>. The 2011 Census learnt from a lot of the difficulties of the 2001 Census and produced more robust population estimates as a result.

6. The age/sex distribution of the discrepancy for Tendring is quite informative. Generally speaking the discrepancies between Census based and rolled forward estimates are greatest for the young adult population. This reflects the high level of population churn for this group and the difficulty in measuring internal migration for this group given their generally good health and their poor levels of interaction with the health service. Tendring's discrepancies are different, they tend to be spread relatively evenly a wide part of the age range with a particularly large amount of discrepancy at the end of the age distribution. Given the low volume of moves for older people (say 70+), due to both internal migration and international migration, for these individuals it is difficult to see how this error could have been caused by migration. Much more likely is that we started off with a base population that was slightly overestimated and this discrepancy was carried through the entire decade.

It is also interesting that the discrepancy is relatively symmetrical for males and females (5,682 males, 4,851 females). If the problem were overwhelmingly internal migration based we might also expect the discrepancy to be substantially larger for males than females.

7. As you may be aware we are in the process of changing some of methods ([see appendix 2 for details](#)). One of these changes involves removing part of internal migration process called "scaling factors", these were used to adjust the level of raw internal migration flows picked up using the patient register and HESA to account for moves by people who did not appear on the beginning and end patient register (those who were born, died, immigrated or emigrated during 12 months preceding the mid-year point) and those who moved more than once during the year. In effect this applied a multiplier to the levels of in inflows and outflows to each local authority. The removal of these scaling factors has, very recently, revealed some interesting side effects of the scaling process. For Tendring the impact of

scaling factors would have been to make internal migration flows increasingly positive and may have been a partial contributor to the unattributable difference found in 2011.

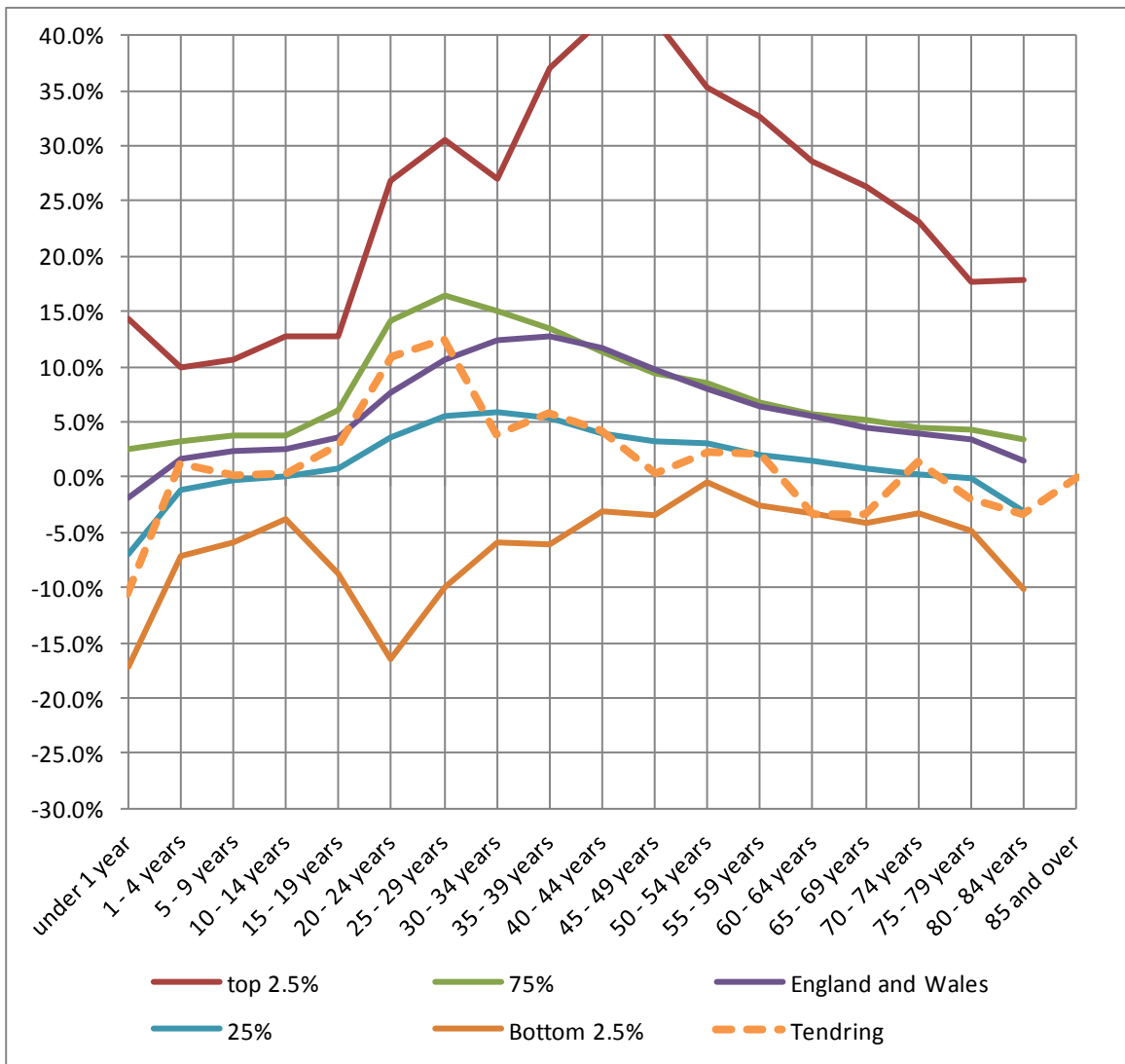
8. We think the evidence suggests that around 4,500 of the discrepancy is due to the 2001 Census base. Some of the remaining difference may be due to sampling error relating to the 2011 Census but this is still likely to leave 5-6,000 of the difference unexplained.

We would therefore think that the discrepancy due to migration is likely to at most 5-6,000. The impact of scaling that I mentioned in point 7 *may* account for 3-4,000 of the difference. Our traditional viewpoint on LAs such with net internal inflows has been that any internal migration discrepancy would have lead to an underestimate of the population rather than an overestimate.

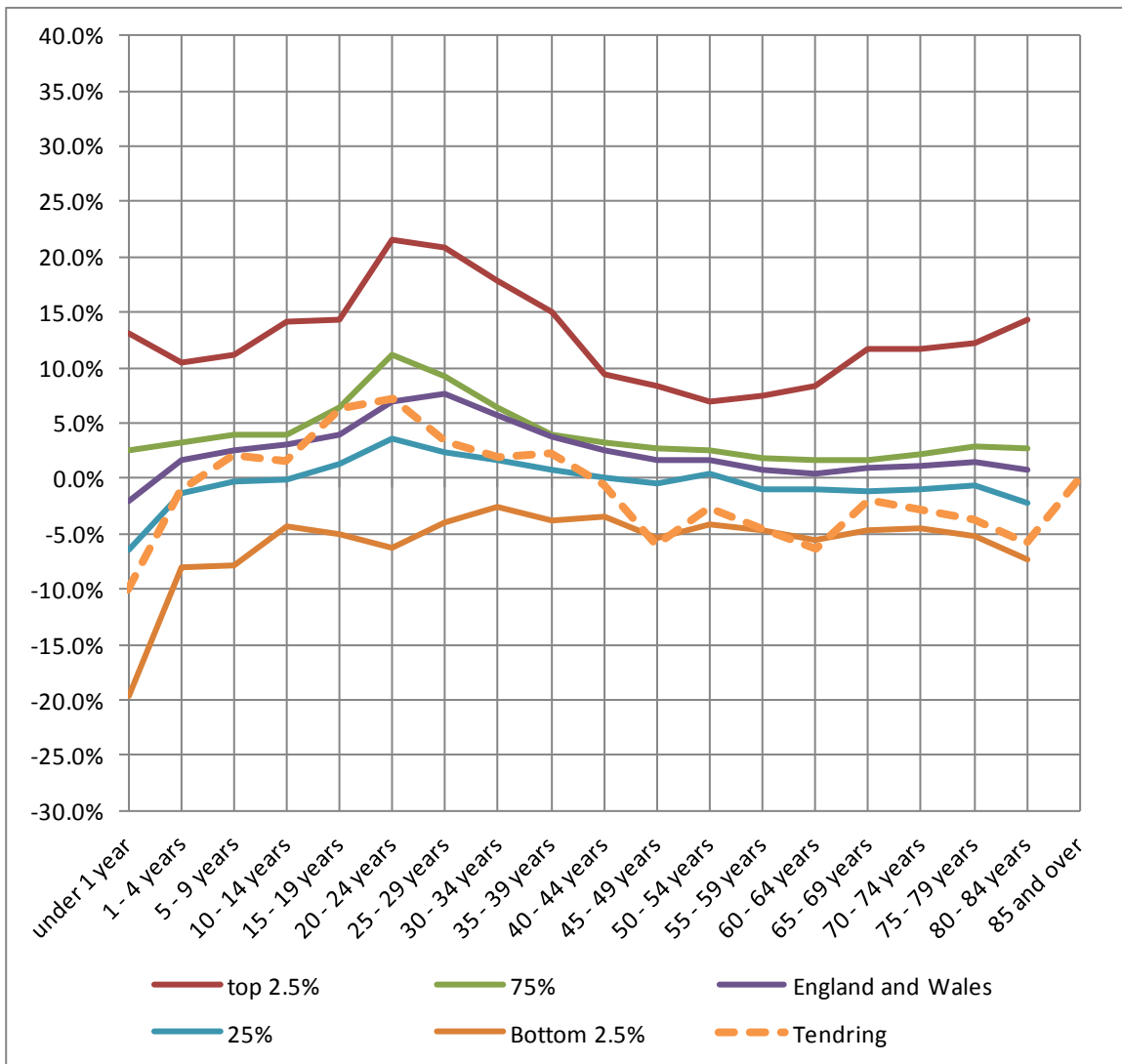
I've mentioned, as part of 7, that because we don't simply use GP patient registrations, it is possible for us to both over-estimate the inflows and the outflows. The findings I mentioned in point 7 are only about 2 weeks old, assuming these don't change (a flaw in the analysis could yet be found) it suggests that overestimation of the inflow was a more significant driver of the discrepancy than underestimation of the outflow.

This would leave around 2-3,000 of the difference unexplained. The "[understanding discrepancies tool](#)" I previously linked you to suggests that international immigration may have been overestimated for young these are the charts I included (I've added the 2011 equivalents as well).

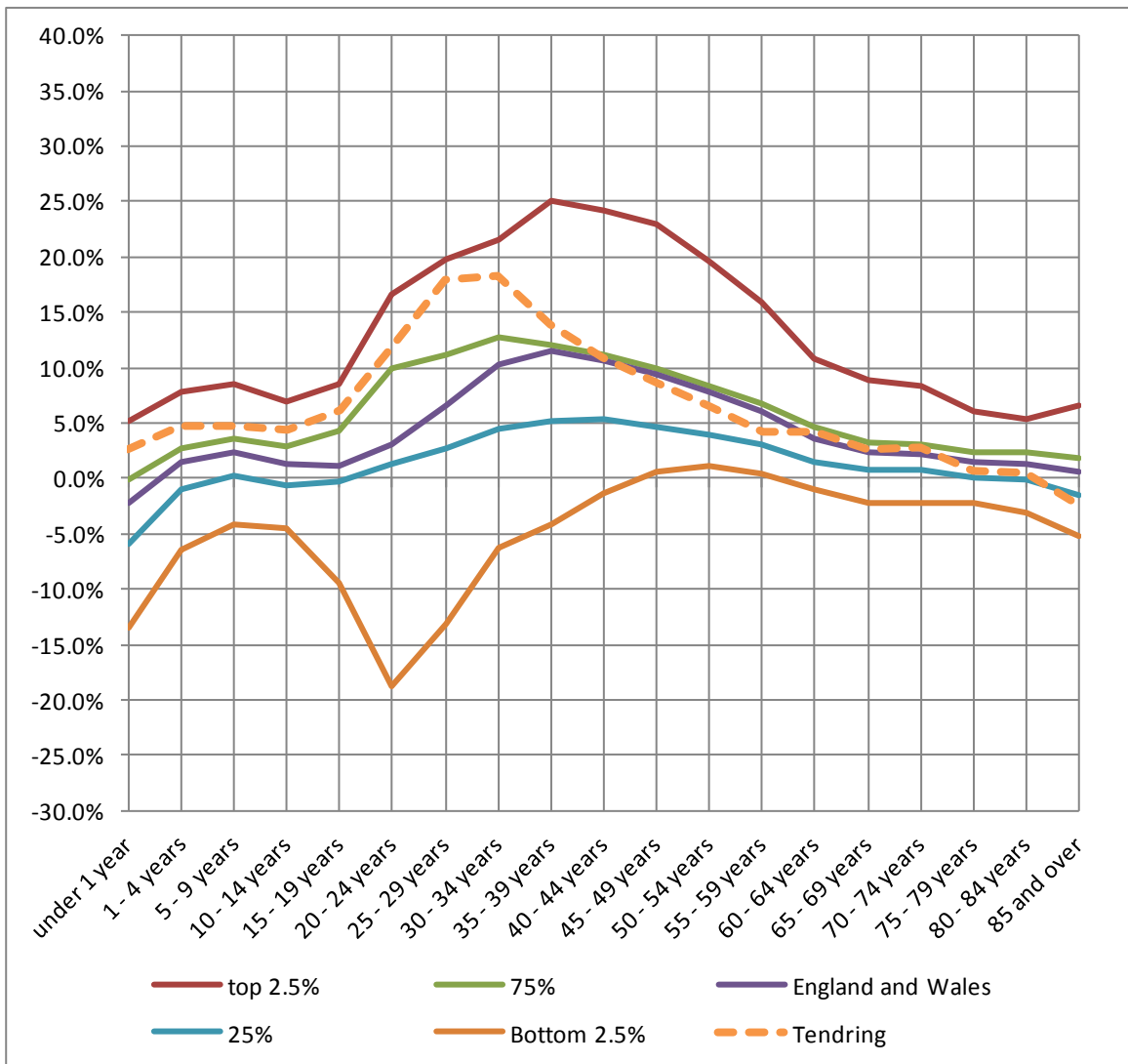
% difference between PR and Census for LAs, 2001 (males)



% difference between PR and Census estimate for LAs, 2001 (females)

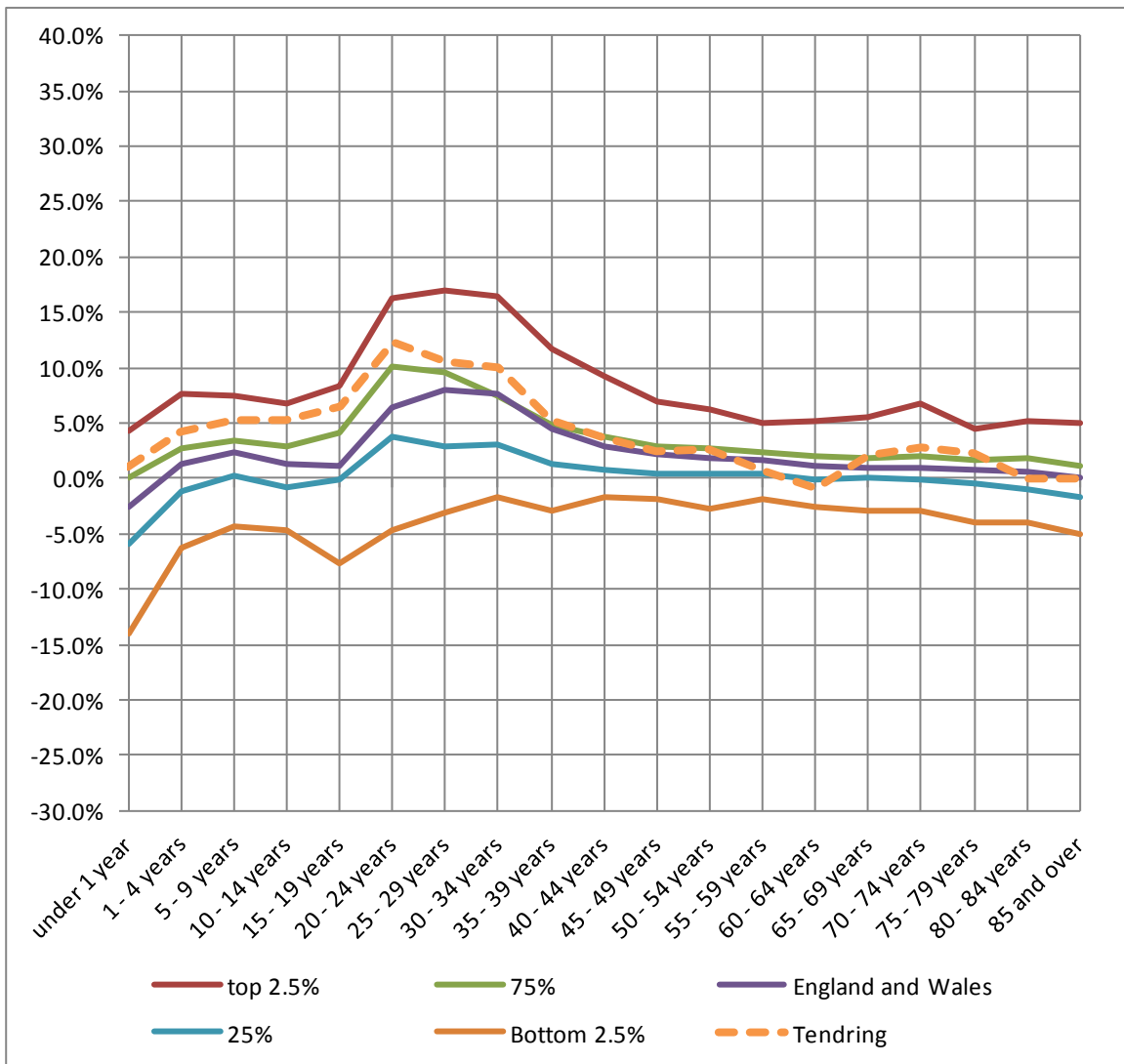


% difference between PR and Census estimate for LAs, 2011 (males)





% difference between PR and Census estimate for LAs, 2011 (females)



adults (those aged 20-39).





# Phase 2

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## Statement of Common Ground

**Prepared By:** Phase 2 Planning  
**Site:** Land North-West of Sladbury's Lane, Clacton-On-Sea  
**Appeal By:** Mr R Giles  
**In relation to:** Refusal of Outline Planning Permission by Tendring District Council  
**Application Reference:** 15/01351/OUT

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## 5. 5 Year Land Supply Shortfall

- 5.1 Peter Brett Associates (PBA) have been instructed on behalf of the north Essex Districts of Tendring, Colchester, Braintree and Chelmsford to prepare evidence on the Objectively Assessed Housing need for the Housing Market Area. The PBA Objectively Assessed Housing Needs Study published in January 2016 and updated in November 2016 advises that the OAN for Tendring District for the period 2013-2037 should be between 500 and 600 dwellings per annum, and recommended using 550 dwellings per annum where a single figure is required.
- 5.2 In the absence of an up to date Local Plan, the parties agree that the OAN for the District should be used to determine the District's housing requirement. The calculation set out in the PBA November 2016 represents the most recent estimate of OAN. The Council's Local Plan Committee has agreed that the objectively assessed housing need for Tendring is between 500 and 600 dwellings per annum between 2013 and 2033 based on the content of this report. The parties agree that the Council's calculation of 550 dwellings per annum as the objectively assessed housing need is derived from the mid-point of the range of 500-600 dwellings identified in the January 2016 Objectively Assessed Housing Needs Study (produced by Peter Brett Associates), which the July 2017 Objectively Assessed Housing Needs Study update (again by PBA) suggested remain unchanged.
- 5.3 The Council has also agreed that 550 dwellings per annum will be used for development management in calculating five-year housing supply requirements. 550 dwellings per annum also forms the basis of the housing requirement of 11,000 in the Council's publication draft Local Plan. This figure has not been calculated using official, sub-national population and household projections as the starting point; but rather through an approach which departs from these, and uses an alternative 'demographic starting point' of 480 dwellings per annum.
- 5.4 In relation to the appropriate demographic starting point, Planning Practice Guidance states:
- "The household projections produced by the Department for Communities and Local Government are statistically robust and are based on nationally consistent assumptions. However, plan makers may consider sensitivity testing, specific to their local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates. Account should also be taken of the most recent demographic evidence including the latest Office for National Statistics population estimates.
- Any local changes would need to be clearly explained and justified on the basis of established sources of robust evidence".
- 5.5 The parties agree that the most recent sub-national household projections are the 2014-based projections published by DCLG in 2016; and that these project the number of households in the District will increase from 62,500 to 77,508 between 2013 and 2037.



## **North Essex Authorities – Common Strategic Part 1 for Local Plans**

### **Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)**

#### **Environmental Report – Preferred Options:**

#### **Non-Technical Summary**

**June 2016**

The policy is as follows:

<b>POLICY SP2 – MEETING HOUSING NEEDS</b>			
<p>The local planning authorities will identify sufficient deliverable sites or broad locations for their respective plan period, against the requirement in the table below.</p> <p>Each authority will maintain a sufficient supply of deliverable sites to provide at least five years' worth of housing; and will work proactively with applicants to bring forward sites that accord with the overall spatial strategy and relevant policies in the plan.</p>			
	Plan period	Net additional dwellings per annum	Total requirement for plan period
Braintree	2016-2033	845	14,365
Colchester	2013-2033	920	18,400
Tendring	2013-2033	550	11,000
North Essex		2,315	

**Table 10: Impact on Sustainability Objectives: Policy SP2**

Temporal Impacts	Sustainability Objectives (SO)														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
Short	N/A	++	N/A	+	N/A	N/A	N/A	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Medium	N/A	++	N/A	+	N/A	N/A	N/A	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Long	N/A	++	N/A	++	N/A	N/A	N/A	+	N/A	N/A	N/A	N/A	N/A	N/A	N/A

### 6.4.2 Significant and Temporal Effects

Significant positive impacts have been highlighted in the short to long term associated with the housing need (SO2) targets set out in the Policy. There will also be positive impacts in the short-medium term on employment growth (SO4), progressing to significant positive impacts in the long term associated with the requirement that Garden Communities be forthcoming to meet residual or unmet need. This is due to the number of new homes being needed to provide sufficient labour to meet the number of forecast jobs, as per the methodology behind the identification of the need in the OAN Report, and the need to provide a range of employment opportunities in association with Garden City Principles. Although the Policy is primarily concerned with setting out housing needs across the three authorities, the link between this and employment derives from a 15% 'future employment' uplift over the whole HMA in order to cover any 'market signals' adjustment that can reasonably be justified; this ensures that a key tenet of sustainability is met associated with delivering housing and employment needs in unison.

For context, the OAN Report states that projections are robust, 'with one exception: the figures for Tendring are heavily affected by Unattributable Population Change - an error in the Census which we are unable to explain. Depending on the view taken about the UPC, the official projections may

overstate need in Tendring. If we use an alternative projection that adjusts for the UPC, the demographically projected need for Tendring falls from 705 to 479 dpa.'

In considering the assessment of the Policy alongside the alternatives (see below), it should be acknowledged that 550 dwellings a year is suggested as the indicative objectively assessed need for Tendring because at this level of provision affordable need can be met. This, in conjunction with review, is considered an appropriate response to the uncertainty arising from the UPC and for this reason has been selected, in line with Tendring's Local Plan policy and evidence base requirements.

Please note that for the rest of the Sustainability Objectives, 'N/A' has been highlighted. This is due to many of these objectives being more closely related to the detailed distribution of housing in specific areas. In focusing the appraisal of this policy on more direct or directly relevant Objectives, the conclusions of the Common Strategic Part 1 for Local Plans can be better informed in relation to the whole document, with recommendations being more focused to the specific purpose of relevant elements or Policies.

### **6.4.3 Secondary Effects**

There will be a long term secondary effect associated with education and skills (SO8) associated with the development of Garden Communities to meet residual unmet need beyond the identification of suitable sites within the context of the authorities' Local Plan requirements. This is associated with the principles of such settlements, in addition to the indirect effects of identifying growth requirements in conjunction with identifying housing growth in order to provide sufficient labour to meet forecasted employment requirements.

### **6.4.4 Alternatives Considered**

The NPPF is clear that the HMA as whole should work to meet its OAN in full, provided that it has the sustainable capacity to do so consistent with the policies in the NPPF. How provision should be distributed between districts will depend on supply factors and policy objectives. In response to this, it should be noted that each authority has identified a justified and achievable indicative housing target in line with their work towards a Local Plan in each instance and these needs are reflected in the policy. This work has factored in the requirements of LPAs to identify a 5 year housing supply in line with, and as well as other requirements of the NPPF, notably regarding the evidence gathered through Local Plan call-for-sites processes and resultant work in the production of Strategic (Housing) Land Availability Assessments (S[H]LAAs). This work identifies land that is suitable, achievable and available (within Local Plan periods) and alternatives surrounding each authority's capacity for new growth are explored in more detail in the SA of their Local Plans, which also factor in non-strategic allocations.

The scope of the Common Strategic Part 1 for Local Plans explores options for the delivery of the residual or 'unmet' growth beyond those sites that represent a 5 year housing supply and are otherwise suitable, achievable and available over Local Plan periods in each authority. On this basis, the alternative options for both housing and employment supply largely represent the conclusions of this SA, in exploring the sustainability of the proposed Garden Community options.

Nevertheless, at the strategic level alternatives exist that could initially be perceived as reasonable across the HMA and more specifically within the three authorities participating in exploring options within the Common Strategic Part 1 for Local Plans document. The Objectively Assessed Housing



Need Study and SHMA update seek to establish a balance between jobs and homes across the area, although there is some uncertainty in relation to this arising from unattributed population change (UPC) within Tendring. A total of 550 dwellings a year is suggested as the indicative objectively assessed need for Tendring because at this level of provision affordable need can be met. This reasonable rounded figure, which should be kept under review, is considered an appropriate response to the uncertainty arising from the UPC.

For the purposes of robustness however, the alternative scenarios presented in the OAN Report have been subject to appraisal in this report. These respond to different percentage uplifts in future employment than for the 15% iterated within the preferred policy above. The alternatives, as sourced within the OAN Report are:

- Alternative 1 – A lower uplift than the policy approach. This responds to 8% uplift over the HMA and represents an indicative split where Tendring still meets its SNPP provision and the uplift is reduced for the HMA partner authorities.
- Alternative 2 – A higher uplift than the policy approach. This responds to 17% uplift over the HMA and represents an approach where Tendring provides only enough homes to meet its projection before any uplift is applied.

Temporal Impacts	Sustainability Objectives (SO)														
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
<b>Alternative 1 - A lower uplift than the policy approach</b>															
Short	N/A	+/?	N/A	+/?	N/A	N/A	N/A	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Medium	N/A	+/?	N/A	+/?	N/A	N/A	N/A	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Long	N/A	+/?	N/A	+/?	N/A	N/A	N/A	+/?	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<b>Alternative 2 - A higher uplift than the policy approach</b>															
Short	N/A	++	N/A	+	N/A	N/A	N/A	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Medium	N/A	++	N/A	+	N/A	N/A	N/A	0	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Long	N/A	++	N/A	++	N/A	N/A	N/A	+	N/A	N/A	N/A	N/A	N/A	N/A	N/A

Alternative 1 has been appraised to represent an indicative lower uplift than the 15% used in the preferred policy approach. The implications of this scenario are that housing requirements are comparatively evenly spread across the three authorities, with approximately 700 dwellings per annum identified for Tendring. The OAN Report indicates that under this alternative scenario it is possible that Tendring would have a surplus of homes against those needed to support the HMA baseline job growth and commuting patterns would shift slightly. Although similar impacts could be expected for both this alternative and the preferred policy approach, it is important to consider that this is based on two key assumptions; that housing provision in Tendring meets the SNPP 2012 housing demand, and that any surplus of workers over jobs is available to work in the rest of the HMA. For this reason impacts are uncertain. Work towards agreeing a housing requirement undertaken by Tendring District Council for the purposes of their Local Plan calculates that capacity exists as indicated and espoused in the preferred policy, as evidenced by extant planning

permissions, windfall allowances, submitted sites in the LPAs call-for-sites process as deemed suitable, achievable and available in their SHLAA and inconformity to their settlement hierarchy. For these reasons this alternative has been rejected.

Alternative 2 has been appraised to represent an indicative higher uplift than the 15% used in the preferred policy approach. In this alternative the scale of the uplift in new homes needed increases from 15% to 17% for the HMA. This is because the OAN 'starting position' for Tendring is now lower than the SNPP. This responds to an additional 50 dwellings per annum in Tendring over the plan period, with no additional changes to the preferred policy approach's housing requirement figures for the other two authorities. Although this could be perceived as a small increase over the entire HMA, which is reflected in the above appraisal, it does not address the question regarding UPC and would have implications on available land in Tendring. Impacts would be similar largely due to the alternative not being distinctly different from the preferred policy approach at the strategic level over the HMA; however the implications at the micro level, in Tendring are likely to be more significant. As per Alternative 1, work towards agreeing a housing requirement undertaken by Tendring District Council for the purposes of their Local Plan calculates that capacity exists as indicated and espoused in the preferred policy, as evidenced by extant planning permissions, windfall allowances, submitted sites in the LPAs call-for-sites process as deemed suitable, achievable and available in their SHLAA and inconformity to their settlement hierarchy. For these reasons this alternative has been rejected.

#### **6.4.5 Proposed Mitigation Measures / Recommendations**

No mitigation measures or recommendations are proposed at this stage.