

NORTH ESSEX AUTHORITIES

Shared Strategic (Section 1) Plan

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To:

Emma Goodings, Head of Planning and Economic Growth, Braintree District Council

Karen Syrett, Planning and Housing Manager, Colchester Borough Council

Gary Guiver, Planning Manager, Tendring District Council

6 August 2020

Dear Ms Goodings, Ms Syrett and Mr Guiver

OFFICE FOR NATIONAL STATISTICS: 2018-BASED HOUSEHOLD PROJECTIONS

1. Thank you for your letter [NEA/018] entitled NEA Statement on 2018-based Household Projections, which you sent on 31 July 2020. It responds to my letter of 2 July 2020 [IED/023] in which I asked if the NEAs would

provide a statement, with evidence-based reasons, on whether or not they consider that the publication of the 2018-based household projections represents a meaningful change in the housing situation from the situation that existed when I produced my letter of 27 June 2018 [IED/012]; and if so, what the implications are for the housing requirement figures in the submitted Section 1 Plan¹.

2. Your statement NEA/018 makes it clear that the NEAs consider that the publication of the 2018-based household projections does not represent a meaningful change in respect of the submitted housing requirement figures

¹ The housing requirement figures are set out in policy SP3.

for Colchester and Tendring, which are 920 and 550 dwellings per annum [dpa] respectively.

3. Your statement NEA/018 also appears to suggest that reducing the submitted housing requirement figure for Braintree to 623dpa, by removing the 15% market signals uplift which I endorsed in IED/012, might be appropriate. But it is not clear from your statement whether the NEAs consider that there has been a meaningful change in the housing situation which means that Braintree's original submitted requirement figure of 716dpa is no longer supported by the evidence.
4. As you know, my role in the examination is to determine whether or not the submitted Section 1 Plan is sound and legally-compliant, and if it is not, to recommend main modifications to make it so. It is important, therefore, that I understand whether the NEAs consider either that the submitted housing requirement figure for Braintree remains sound, or that it is unsound because it is no longer supported by the evidence and the evidence now supports a different figure. I would be grateful if you would respond to this letter in order to clarify that point.
5. Could I ask that in your response you clarify a further point. Part of the evidence which supported the original submitted housing requirement figure for Braintree concerned employment trends. In IED/012 I summarised that evidence as follows:

The OAHN Study [EB/018] compares two economic forecasts of job growth and associated dwelling requirements for Braintree and Colchester. In each case the higher of the two dwelling requirement forecasts (from the East of England Forecasting Model) indicates that an increase in the starting-point figure for housing need is required if labour supply and economic growth are not to be constrained. The respective increased figures are 702dpa for Braintree (against a starting-point of 623dpa) and 920dpa for Colchester (starting-point 866dpa).

6. A reduced housing requirement of 623dpa would be significantly below the figure of 702dpa indicated by the evidence on employment trends which was before me in July 2018, and I note that your statement NEA/018 does not refer to employment trends. Could you please clarify if there is any additional evidence on employment trends which you would like to draw to my attention, which would assist in determining whether or not the original submitted housing requirement figure for Braintree remains sound, or that the evidence now supports a different figure.

7. I also have one query on the Stantec report on the 2018-based household projections that was submitted with your statement NEA/018. At paragraph 4.5, it explains that

We have modelled an alternative new projection that uses a five-year base period for migration, and also is 2019-based, so it takes account of the latest Mid-Year Population Estimates. This alternative projection ('NMSS 2019') shows growth of 430 households per year [in Braintree] over the plan period ...

8. Would you please provide the methodology and calculations for that alternative new projection (NMSS 2019), since it is now part of the evidence base for the examination.
9. Once I have your response on the three points underlined above, I will be able to advise on how this matter could be taken forward through the examination. I share your desire for an approach which minimises any delay to the examination but also ensures that the Section 1 Plan's housing requirements are soundly based.
10. As you suggest, the most appropriate next step is likely to be to invite representations from examination participants and members of the public on the question which I put to the NEAs in my letter of 2 July 2020 [IED/023] – see paragraph 1 above. As part of that process it would be sensible also to invite comments on the NEAs' statement NEA/018, the accompanying Stantec report and the NEAs' response to this letter. This could all be done at the same time as, or if necessary a little later than, the forthcoming consultation on the proposed main modifications.
11. Whether or not it is then necessary to hold a further hearing session to inform my consideration of the issue will depend on the nature of the representations received. Similarly, it is not possible to say at this stage whether or not any further main modification(s) will be necessary, and whether or not it will be necessary to consult on them.
12. I would however like to comment on your suggestion in NEA/018 that

If the Inspector considers that there is a need for further examination on the Braintree Local Plan, then the NEA request that a separate letter of soundness should be provided to Colchester and Tendring so that they can proceed to adoption and examination of their section 2 Plans without delay.
13. In your letter of 31 July 2020 entitled Modifications Request [NEA/019], the NEAs made a request to me under Section 20(7C) of the *Planning and Compulsory Purchase Act 2004* (as amended) to recommend main

modifications to make the Section 1 Plan sound and legally compliant. That section of the Act also requires me to give reasons for my recommendations. By "separate letter of soundness" I assume you mean a separate report containing my recommendations and reasons on the Plan in respect of Colchester and Tendring, but not Braintree.

14. The difficulty I see with that approach is that the Section 1 Plan is drafted as a shared plan covering the three North Essex Authorities. In order for me to provide a report covering just Colchester and Tendring, it seems likely to me, on the face of it, that I would need to recommend numerous main modifications to the Plan to remove specific references to matters concerning Braintree. That would seem to have the potential to increase, rather than reduce, any delay to the examination.
15. Having said that, I fully understand and share your concern to move both the Section 1 and Section 2 examinations forward as quickly as possible, and I will consider any further suggestions you may wish to make in that respect.

Yours sincerely

Roger Clews

Inspector