

NORTH ESSEX AUTHORITIES
Shared Strategic (Section 1) Plan

Inspector: Mr Roger Clews

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Address: Examination Office, PO Box 12607, Clacton-on-Sea, CO15 9GN

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

4 September 2020

Dear Ms Goodings, Ms Syrett and Mr Guiver

OFFICE FOR NATIONAL STATISTICS: 2018-BASED HOUSEHOLD PROJECTIONS

1. Thank you for your further letter [NEA/020] entitled NEA Further Response on 2018 Household Projections, which you sent on 24 August 2020. Your letter responds to mine of 6 August 2020 [IED/024] in which I asked for three points to be clarified:
 - whether or not the NEAs consider that the housing requirement figure for Braintree in the submitted Section 1 Plan policy SP3 (716 dwellings per annum) remains sound;
 - whether there is any additional evidence on employment trends which would assist in determining whether the housing requirement figure for Braintree remains sound;
 - the method used by NMSS to arrive at an alternative 2019-based household projection for Braintree. That alternative projection was referenced in the Stantec report on the 2018-based Household Projections which was enclosed with your previous letter on this topic.
2. In NEA/020 you provided a thorough response to my requests for clarification which can be summarised as follows:

- having weighed carefully all the evidence, the NEAs do not believe there has been a significant change in the housing need situation for Braintree District which represents a meaningful change such that the submitted housing requirement figure of 716dpa would be unsound;
 - the 2019 EEFM forecast has not been made publicly available and the NEAs do not have a publication date for it. The NEAs have not considered it appropriate at this stage to commission a further run of the Experian model. Therefore the 2017 EEFM is the most recent employment-led scenario. This has already been considered in the examination (see my letter IED/022);
 - a note on the method used by NMSS to calculate the 2019-based household projections for Braintree was provided with NEA/020.
3. NEA/020 also draws attention to two minor errors in the original Stantec report which have now been corrected.
 4. In NEA/020 you go on to say that *we would welcome a clear expression of your view on this matter and we will take forward any next steps which you believe are appropriate to deal with this issue and to move the examination of the Local Plan forward as quickly as possible.*
 5. As I made clear in IED/024, I share your desire to move the examination forward as quickly as possible. But it would be inappropriate, in my view, for me to reach a conclusion on the implications of the 2018-based household projections for the soundness of the housing requirements in the submitted Section 1 Plan, until I have also sought the views of other interested parties on the matter.
 6. I therefore intend to write to all the examination participants and other parties on the NEAs' Local Plan consultation databases, inviting them to submit their views on that matter and allowing four weeks for their responses. In their responses, they will of course also have the opportunity to comment on the Stantec report and the NMSS method note.
 7. I cannot say at this point whether any further steps will then be needed before I am able to reach a conclusion on this matter. As with the consultation on the main modifications, however, I will be guided by the *Procedure Guide for Local Plan Examinations*¹, which advises at paragraph 6.9 that "further hearing sessions will not usually be held, unless the Inspector considers them essential to deal with substantial issues raised in the representations, or to ensure fairness".

¹ <https://www.gov.uk/government/publications/examining-local-plans-procedural-practice>

8. Finally, I would like to reiterate that I will do everything I can to minimise any delay to the examination, while also doing what is necessary to meet my legal duty to ensure that the plan is sound and legally-compliant².
9. Please publish this letter on the examination website as IED/025.

Yours sincerely

Roger Clews

Inspector

² See section 20 of the *Planning and Compulsory Purchase Act 2004*, as amended.