

NORTH ESSEX AUTHORITIES**Shared Strategic (Section 1) Plan****Inspector:** Mr Roger Clews**Programme Officer:** Mrs Andrea Copsey**Tel:** 07842 643988**Email:** copseyandrea@gmail.com**Address:** Examination Office, PO Box 12607, Clacton-on-Sea, CO15 9GN

9 September 2020

Dear Sir / Madam

IMPLICATIONS OF THE 2018-BASED HOUSEHOLD PROJECTIONS FOR THE HOUSING REQUIREMENTS IN THE SECTION 1 PLAN

1. As you may know, I am the Inspector carrying out the examination of the North Essex Shared Strategic Section 1 Plan [the Section 1 Plan]. I am writing now to invite you to submit responses, if you wish, on the two questions set out below. Please keep your comments as brief as possible, and **email or post them to the Programme Officer, Andrea Copsey, to arrive by 5pm on Monday 12 October 2020.**
2. The questions on which I am inviting responses are:
 - (a) **Do you consider that the publication of the 2018-based household projections represents a meaningful change in the housing situation from the situation that existed when I produced my letter of 27 June 2018 [IED/023]?**
 - (b) **If so, what are the implications of that change for the soundness of the housing requirement figures in the submitted Section 1 Plan?**
3. Before responding, please read the following sections of this letter, which set out the background to these questions and give further advice on how to respond. All the documents referenced in this letter (with reference numbers in square brackets) are available on the examination website: https://www.braintree.gov.uk/info/200643/section_1/1065/section_1_examination_publication_local_plan

BACKGROUND

4. Policy SP3 of the submitted Section 1 Plan sets out housing requirement figures for the plan period (2013-2033) for each of the three North Essex Authorities [NEAs]. The principal evidence base document supporting those figures is the *Objectively Assessed Housing Need Study, November 2016 update* [EB/018] by Peter Brett Associates. In my letter to the NEAs of 27 June 2018 [IED/012], I concluded that the housing requirements in the submitted Plan were soundly based.

5. Guidance on assessing housing need and setting housing requirements for local plans is given in the national Planning Practice Guidance [PPG] on Housing and economic needs assessment¹. At paragraph 016 (Reference ID: 2a-016-20150227), it advises that:

The government's official population and household projections are generally updated every 2 years to take account of the latest demographic trends. [...]

Wherever possible, local needs assessments should be informed by the latest available information. The National Planning Policy Framework is clear that Local Plans should be kept up-to-date. A meaningful change in the housing situation should be considered in this context, but this does not automatically mean that housing assessments are rendered outdated every time new projections are issued.

6. When the shared Section 1 Plan was submitted for examination in 2017, the most recent household projections were the 2014-based projections published in July 2016 by the then Department for Communities and Local Government. The 2014-based projections were taken into account in EB/018 and in other evidence provided by the NEAs to support the housing requirement figures in the submitted Plan.

7. The Office for National Statistics [ONS], having taken over responsibility for preparing the household projections, published the 2016-based projections in September 2018. I held a hearing session on housing need in January 2020 at which, among other things, the implications of the 2016-based projections for the Plan's housing requirements were discussed. In my letter to the NEAs of 15 May 2020 [IED/022], I concluded that there had not been a meaningful change in the housing situation that I considered in

¹ This version of the PPG continues to apply to the Section 1 Plan because the Plan is subject to the transitional arrangements set out in paragraph 214 of the National Planning Policy Framework (February 2019).

IED/012, and consequently that the Plan's housing requirement figures remained soundly based.

8. In June 2020 the ONS published their 2018-based household projections. In the table below I have summarised what I understand to be the 2014-based, 2016-based and 2018-based projections for each of the NEAs over the Plan period (2013-2033), and also over the period 2013-2037 which was studied in EB/018.

2014-based household projections (DCLG, July 2016) 1,000s of households, rounded to nearest 1,000					
	2013	2033	2037	Growth 2013-33	Growth 2013-37
Braintree	62	75	77	13	15
Colchester	74	91	94	17	20
Tendring	63	75	79	12	16
2016-based household projections (ONS, Sept 2018) 1,000s of households, rounded to nearest 1,000					
	2013	2033	2037	Growth 2013-33	Growth 2013-37
Braintree	62	72	74	10	12
Colchester	73	93	96	20	23
Tendring	63	77	80	14	17
2018-based household projections (ONS, June 2020) 1,000s of households, rounded to nearest 1,000					
	2013	2033	2037	Growth 2013-33	Growth 2013-37
Braintree	62	69	71	7	9
Colchester	73	91	94	18	21
Tendring	63	77	79	14	16

9. In order to determine whether or not the Plan's housing requirements remain soundly-based, I will need to consider whether or not 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].
10. The following letters and documents on the examination website are relevant to this issue. It would be helpful for you to read them before you respond to this letter, and you may of course refer to and comment on them in your response, if you wish.
- My letters to the NEAs of 5 July, 6 August, and 4 September 2020 [IED/023, IED/024 & IED/025]

- The NEAs' letters to me of 31 July and 24 August 2020 [NEA/018 & NEA/020]
- A report by Stantec providing supporting information to NEA/018 [NEA/018a]
- A note on the method used to calculate the alternative household projection (NMSS 2019) referenced in the Stantec report [NEA/020a].

HOW TO RESPOND

11. Please ensure that your response directly addresses the questions in paragraph 2 above, and includes any supporting evidence that you wish to refer to. There is no prescribed format or word limit for your response, but please keep it as brief as possible, and give it the heading "Response to consultation on 2018-based household projections".
12. Please **email or post your response to the Programme Officer, Andrea Copsey, to arrive by 5pm on Monday 12 October 2020**. I will consider all the responses received by that deadline before reaching a view on the questions in paragraph 2 above.
13. As you may be aware, separately from this invitation to submit responses, public consultation is currently taking place on the proposed main modifications to the Section 1 Plan. Details of that public consultation can be found at: https://braintree.objective.co.uk/portal/nea/s1_pmmods/

Yours faithfully

Roger Clews

Inspector