

Ms Andrea Copsey
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9 October 2020

EP ref: 14-007

By e-mail only to: copseyandrea@gmail.com

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Dear Ms Copsey

Re: Response to consultation on 2018-based household projections

Emery Planning is instructed by the Williams Group to respond to the Inspector's questions in relation to the above. We respond as follows.

(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]?

No, the publication of the 2018-based household projections do not represent a meaningful change which would justify a change to the housing requirement for Braintree.

The housing need figures in the submitted Section 1 Local Plan were informed by the 2014-based household projections, which have since been superseded by the 2016-based and more recently the 2018-based household projections. For Braintree, the 2018-based household projections show annual growth of 357 households – a reduction of 249 households from the 2014-based household projections. This would mean Braintree's OAN reduces from 716 dwellings per annum per year to 422 dwellings per annum per year.

However, as set out in the Stantec Report (NEA018a), the reason why the 2018-based household projections are lower in Braintree is because of higher deaths and lower net internal migration. The report explains that the net internal migration to Braintree has fallen since 2013 as a result of constrained housing supply. It also explains that this is based on only two years of data and will rise in



the next release of the household projections. The Stantec Report refers to this as a technical weakness, which may make them unstable.

The response from the NEAs dated 24th August 2020 (NEA020) confirms that the NEAs conclude that the publication of the 2018-based household projections do not represent a meaningful change which would justify a change to the housing requirement for Braintree.

The response states that identifying an OAN has become a historic issue because of the introduction of the standard method for calculating local housing need in the 2018 / 2019 Frameworks. It also refers to the Government's recent consultation on proposed changes to the current planning system, which sought responses on a revised standard method for calculating local housing need. This latest consultation explains that the Government recognises there are problems with using household projections in the calculation of local housing need and therefore instead considers incorporating a percentage of existing housing stock as an alternative to the household projections in the calculation of local housing need. Within this context, the latest household projections should not be regarded as a meaningful change in the housing situation in Braintree as the Government itself recognises there is a problem in relying on household projections for assessing housing need.

Finally, the Inspector will be aware from our previous representations and our representations to the main modifications consultation that we consider the Section 1 Plan should commit to an immediate review. This is because the proposed housing requirement for Braintree (716 dwellings per annum) is significantly below the local housing need (858 dwellings per annum). In these circumstances paragraph 33 of the 2019 Framework and associated guidance in paragraph 61-062 of the PPG state that a review of the plan should take place in an earlier timeframe than five years to ensure that all housing need is planned for as quickly as reasonably possible. Within this context, there would be no logic to reduce the housing requirement further as it is already significantly below the local housing need.

(b) If so, what are the implications of that change for the soundness of the housing requirement figures in the submitted Section 1 Plan?

Because our view is that the 2018-based household projections do not represent a meaningful change, we provide no response to this question.

This concludes our representations. Should you or the Inspector require any further clarification of our client's position on this matter, please do not hesitate to contact me.

Yours sincerely
Emery Planning

Rawdon Gascoigne

**Rawdon Gascoigne BA (Hons), MRTPI
Director**