

Dear Cllr Mooney,

Thank you for your email regarding concerns related to the annualised housing target for the district.

The approved recommendation at Local Plan Committee on 17<sup>th</sup> September is as follows:

- (a) Instructs Officers to go back to the authors of the above-mentioned study to investigate the matters raised by the Committee in respect of figures and assumptions in the study and to explore the possibility of revising its conclusions with a view to setting lower housing growth figures for Tendring such that it was no greater than 479 dwellings per annum, as detailed in Section 4.39 of the Appendix

Officers have implemented this request by setting up and hosting a workshop with the author of this study. The author gave a full presentation and took questions both from members and the two relevant public speakers from that committee.

You raise a number of issues and I have put these to the author – your thoughts and his responses are as follows:

The PBA consultant did highlight some of the many opportunities to achieve a lower DPA target figure. These include:

- Define a different HMA:- Possibly Colchester and Tendring. Different consultants?

A different HMA will not change the Tendring answer. The numbers are derived 'bottom up' from the district and then added to the HMA total. The Tendring 'starting share' will not change.

Excluding Braintree & Chelmsford will do nothing to the sums but will result in a HMA which is very different from the CLG / CURDs HMA and that being used by plan objectors elsewhere. This will only cause problems.

- Population forecasts:- I believe that we were told that the revised approach to the UPC left a flat trend between the censuses. So, investigate the data/maths in detail to understand how a flat 2001 – 2011 trend becomes a 280dpa figure on a 5 year trend and 479dpa on a 10 year trend.
- 280 is simply a reflection of the recession – where national migration was suppressed. Where there is evidence that a longer trend is very different (as is here) then the 5 year trend is not really defensible.
- As to why a flat trend turns into a growing one key message I don't think I got across well enough and answers the question as to why we think Tendring will grow in the future is that the district is particularly attractive for older age migration. As the nation gets ever more elderly the pool of people wanting to move to Tendring increases. Assuming their propensity to migrate remains largely unchanged the larger pool of people wanting to moving increases the Tendring number... (if that makes sense!).
- Demographics :- At some point in the process, possibly prior to getting to 479dpa, PBA have taken into account; increased migration from a larger UK population, smaller households, longer lives. We should see

the data/maths for these. Increased UK population is down to international immigration, which does not come to Tendring, and there is no data to support a decrease in household size during the plan period. Longer lives is [presumably] correct, but offset by people working longer. We should see the data/maths.

I am not sure that the maths / data will get anyone any further.

The Demographic data used is not from PBA but from Edge Analysis (for the EPOA). They use nationally consistent methods and software.

Keeping average household sizes fixed may not be sensible. No Inspector has agreed with this and even the most recent 2012 based Headship rates are being challenged. E.g. see Canterbury Inspectors letter in August.

- Housing restriction:- The consultant was very keen that there was evidence a restriction in housing supply, in the face of the house price facts and ignoring affordability data. Indeed contradicting their own report. Failing that he said we would pick up a 10% or 20% uplift because there had been a gap when we did not have an approved plan in place. The rationale for this stance on uplift requires further investigation.

The uplift is driven by the EPOA employed persons scenario. This single calculation could stand on its own to give you the uplift. The EPOA employed persons scenario is still almost zero job growth over the period (140 per annum and given the size of Tendring this is effectively zero). The job growth in Tendring is almost the lowest of all the LPAs considered in the EPOA report (6.7% - Only Castle Point is lower). The rate of growth is less than 50% of the EPOA average.

The other points only further support the need for an uplift:

The plan gap leaves the Council very vulnerable especially when coupled with a lack of 5 year supply. It is very easy for developers to say that development would have been higher should a plan have been in place and they were not forced to rely on windfalls. An upward adjustment in these circumstances is warranted in the PG ('rate of development' – under market signals).

- EPOA jobs adjustment:- We need to see the data/maths on this. It may very well be that there is a need for more people to maintain the working age population, but this does not all have to be done in dpa. A fall in unemployment would be welcome.

The EPOA data is in the Phase 7 report along with the UE and Commuting assumptions. UE reduces from 5.5% to 3.6%. Commuting changes slightly.

I hope this at least provides a response to some considerations and concerns that you have. Chelmsford, Braintree and Colchester Council's have agreed their figures from the relevant joint reports and in addition Braintree and Colchester have agreed to consider accommodating the difference between Tendring's housing requirement of 705 dpa and the minimum of 597 dpa. The authorities have also made it clear that they consider that the Tendring Plan will be unsound at anything less than 597 dpa. An adjacent Local Authority taking this stance will almost certainly be accepted as a reason for a Planning Inspector to reject Tendring's plan.

After taking this all in to account I do want members to feel assured that the 597 is indeed the lowest figure that will at least give us a fair hearing at the Examination. To this extent I

have commissioned an independent validation of the work. Mr John Hollis, (former GLA chief demographer, Chair of the British Society of Population studies and advisor to the DCLG and ONS) will be carrying out this work. The findings of which will be reported to the next Local Plan Committee.

**PLEASE NOTE – all of this is based on the UPC data being as it is. We do still have the potential golden ticket of the data being used by the ONS being incorrect for Tending and therefore all studies reading from it being incorrect. We are pursuing this UPC issue and its use by Edge analytics and again will report if we hear that this could support a lower figure.**