



Local Plan Committee

Item

7

7 November 2016

Report of	Head of Commercial Services	Author	Karen Syrett 01206 506477
Title	Housing Numbers		
Wards affected	All		

The Local Plan Committee is asked to note the updated evidence base relating to housing numbers for the Borough.

1. Decision(s) Required

- 1.1 To consider the most up to date evidence in relation to housing numbers which supports the targets being used in the emerging local plan.

2. Reasons for Decision(s)

- 2.1 Housing targets tend to be the most controversial element of all Local Plans and the Committee need to ensure the previously agreed targets remain fit for purpose.

3. Alternative Options

- 3.1 The Committee could decide to review the housing numbers currently being used in the Local Plan. This would cause delay to the local plan process, undermine the duty to co-operate and could result in the plan being found unsound. In addition, as the evidence base is considered robust and up to date it is not considered that a review would serve a useful purpose. Further details are provided below.

4. Supporting Information

4.1 Background

Prior to 2010, the housing targets used in local plans or the local development framework, were informed by regional or county wide plans such as the Essex Structure Plan and the East of England Regional Plan. However, on the 27th May the Rt Hon Eric Pickles MP, Secretary of State (SofS) for Communities and Local Government indicated his intention to abolish Regional Spatial Strategies and said that housing numbers would be determined by local authorities based on robust evidence, in line with current policy in PPS3 ie Strategic Housing Market Assessments and Strategic Housing Land Availability Assessments. He also said that if local authorities sought amendments to their housing numbers and associated policies they should be based upon robust evidence.

- 4.2 At the same time, the Government indicated their intention to introduce new legislation on planning through the Localism Bill. The 'Draft Structural Reform Plan' prepared by the Department for Communities and Local Government in July 2010 included the action to:

"Radically reform the planning system to give neighbourhoods much greater ability to determine the shape of the places in which their inhabitants live..."

- 4.3 Initially this was thought to be an opportunity to review and reduce housing numbers and this committee considered a report on the matter in August 2010. The Government however made it clear that any revisions would have to be justified with evidence, which would have to be defensible at an Independent Examination; an Inspector could reject a council's evidence if it wasn't robust and impose a target; sufficient sites for at least a 15 year housing supply should be identified and the same national guidance was still relevant.

- 4.4 The existing Core Strategy was based on housing numbers contained in the now revoked Regional Plan. The Council has however regularly updated its evidence base to ensure it remains fit for purpose and adjusted annual targets as and when necessary to ensure it has retained a robust 5 year supply, as well as a pipeline of additional sites. This has meant that planning decisions can be made with confidence and that no appeals have been allowed based on housing land supply.

4.5 **Evidence Base**

The emerging Local Plan has incorporated a housing target of 920 units a year. This reflects a comprehensive evidence base which includes the following;

- Strategic Housing Market Assessments (SHMA's) for Chelmsford, Colchester and Braintree were completed by David Couttie Associates as part of a joint project also including the Councils of Maldon and Brentwood and were finalised in the summer of 2014.
- Objectively Assessed Housing Need Study produced by Peter Brett Associates (PBA) in July 2015 for Braintree, Chelmsford, Colchester and Tendring Councils.
- Review of the SHMA work in Chelmsford, Colchester, Braintree and Tendring to bring it into compliance with the NPPF and PPG - HDH Planning and Development Ltd, December 2015.
- Objectively Assessed Need Update October 2016.

- 4.6 The National Planning Policy Framework (NPPF) (March 2012) sets out the information that an SHMA should contain at para. 159;

Local planning authorities should have a clear understanding of housing requirements in their area. They should... prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of

housing and the range of tenures that the local population is likely to require over the plan period which:

- *meets household and population projections, taking account of migration and demographic change*
- *addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as families with children, older people, disabled people, service families and people wishing to build their own homes); and*
- *caters for housing demand and the scale of housing supply necessary to meet this demand (para 28).*

In addition Paragraph 50 of the NPPF (second bullet) indicates that local planning authorities should also 'identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand', which would also typically be informed by an SHMA.

- 4.7 Given that the original SHMA did not explicitly follow the steps set out in the PPG, Braintree, Chelmsford, Colchester and Tendring commissioned further work from Peter Brett Associates on housing numbers (Objectively Assessed Need) and HDH on the need for all types of housing. With the completion of the October 2016 update, the Councils now consider they have a comprehensive evidence base to address national guidance requirements for Local Plans.
- 4.8 This evidence base is considered to follow the method set out in the National Planning Practice Guidance (PPG), on the following five broad required topics:
- i. Defining the housing market area – to draw the boundary of the geographical area that the assessment should cover;
 - ii. Demography – to arrive at a trend-based projection that provides the 'demographic starting point' of the needs assessment;
 - iii. Past provision and market signals – to determine if the starting point should be uplifted in the light of market evidence;
 - iv. Future jobs – to determine if the starting point should be uplifted on the interest of labour market alignment, in order to provide enough workers to meet the future demand for labour;
 - v. Affordable housing - to assess if housing need factors covered by the HDH work, including affordable housing demand, resulted in a need to adjust the OAN figures.
- 4.9 The OAN Study has just been updated with the purpose of reviewing the findings of the original report in the light of the subsequent HDH report on housing need and following new evidence, producing a revised housing needs assessment for the same period, 2013-37.
- 4.10 In relation to the first of the five broad topics, the definition of the housing market area, no new evidence has emerged since the 2015 study. Hence the conclusion, that the four authorities form a housing market area within the meaning of the National Planning Practice Guidance remains unchanged.

- 4.11 By contrast, as regards demography, much new evidence has come to light, including the 2014-based official demographic projections. This is important since demographic forecasts form the basis of calculating housing need. Guidance requires that authorities take the Sub-National Population Projections (SNPP) figures produced by the Office for National Statistics which are then translated into a number of households by the Department for Communities and Local Government. These household projections assume that trends based on previous trends in population growth and rates of household formation will continue in future. They do not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. The OAN study takes these household projections and then considers the particular local considerations to produce the Objectively Assessed Housing Need figure for the Strategic Housing Market Area.
- 4.12 There are a number of key drivers behind changing trends in household numbers and housing demand, beginning with the rate of natural change, ie the number of births and deaths. Household formation rates are influenced by a number of trends including the rise in single households arising from the rise in divorced/separated households and elderly people. These upward pressures on household formation has been to some extent reduced by the suppression in new household formation resulting from grown up children having to live at home with their parents because they can't afford to move into their own accommodation.
- 4.13 These trends all influence migration which is the other broad category of population change. This category includes people moving house within the UK as well as international migration. So, for this Strategic Housing Market Area this means that someone moving in from an adjacent area, ie Suffolk or London, would be considered to be an in-migrant.
- 4.14 The main task of the update was to consider the implications of the new demographic data and whether the complex interaction of the various factors noted above had resulted in any significant changes to long term trends. The report considers implications for the 'demographic starting point' and then turns to labour market balance. It goes on briefly to discuss market signals - where the position has not changed significantly - and affordable housing need - where there is no new evidence on the level of need, but the national context has shifted slightly.
- 4.15 The table in Appendix 1 summarises the updated analysis for the three districts of Braintree, Chelmsford and Colchester. It also compares the results with those of the 2015 study. In the table, the sequence of columns follows the stages of the OAN calculation. Each stage is addressed in turn below. All figures relate to change per annum over the plan period 2013-37.

- 4.16 In the table, the first column of data shows the housing need derived from the 2012-based official household projection from the Department of Communities and Local Government (CLG 2012), which was the basis of the 2015 housing needs assessment. The second column shows updated figures derived from the new 2014-based projection (CLG 2014), published in July 2016:
- For the three districts together the figure is virtually unchanged, from 2,214 net new dwellings per annum (dpa) in CLG 2012 for 2,160 dpa in CLG 2014.
 - At the level of individual districts the two projections are also very close. For Braintree, the figure falls by just 64 dpa (9%) between the 2012 and 2014 projections. For the other two districts the differences are even smaller.
- 4.17 Behind these insignificant differences there are two main factors, both relating to the national assumptions that inform the 2014-based ONS population projections, from which the CLG household projections are derived. Firstly, the 2014-based projections assume more net migration to the UK than the previous version, though this only impacts on Colchester and Chelmsford. Secondly, the new projections assume shorter life expectancies and hence higher mortality rates, so there are fewer elderly people. These factors impact on household numbers, and hence on housing need, in opposite directions. Other things being equal, more population means more households; but fewer elderly people means fewer households for a given population, because older people tend to live in smaller households.
- 4.18 Column 3 of the table shows an alternative demographic scenario, created by PBA, which they use as a sensitivity test. While the official projections are based on rolling forward the migration trends of the last five or six years, their Trends 2005-15 scenario is based on a 10-year period; it is also updated to take account of the latest population data, from the ONS 2015 Mid-Year Population Estimates, which post-date the latest official projections.
- 4.19 For the area as a whole (though not for individual districts) the Trends scenario produces virtually the same result as CLG 2014. This suggests that for the three districts the 2014 projections are not unduly affected by short-term fluctuations that distort underlying migration trends.
- 4.20 From this sensitivity testing and other demographic analysis PBA conclude that the CLG 2014 projection is a reasonable reflection of past demographic trends. This means that it is the appropriate 'demographic starting point' for the housing needs assessment.
- 4.21 The updated analysis of market signals shows no significant change in the relative position of the three districts since the 2015 study. In that study it was concluded that the market signals uplift for the Housing Market Area as a whole should be in the region of 10%, and did not draw conclusions on uplifts for the individual districts. There was no need for such conclusions, because 'market signals' and 'future jobs' uplifts

overlap, and PBA judged that the future jobs uplifts they were applying exceeded any market signals uplift that could possibly be justified.

- 4.22 The present update provides a new analysis of future jobs, which in two of the three districts produces lower housing numbers than the 2015 version. Therefore PBA have re-examined the evidence on past provision and market signals, aiming to advise on possible uplifts for each district. In line with the PPG there is no clear 'scientific' basis for determining these adjustments; they depend on judgment as well as evidence. In PBA's judgment the following uplifts are justified:
- Braintree: 15%, mainly because housing land supply may have been constrained in the period whose trends the demographic projection rolls forward, and because affordability is poor.
 - Chelmsford 20%, also due to possible supply constraints in the past and poor affordability, plus relatively high house prices.
 - Colchester 0%, because there was no evidence of undersupply.

These percentages, and the uplifted housing numbers that result, are shown at Columns 4 and 5 of the Table.

- 4.23 In the 2015 study, the recommended 'future jobs' uplifts were based on the Greater Essex Demographic Forecasts Phase 7 study, produced by Edge Analytics for the Essex Planning Officers Association (EPOA). The Edge study started from the job forecasts shown in the 2014 East of England Economic Forecasting Model (EEFM). In its 'Employed People scenario' the study estimated the housing growth that would be required to accommodate enough workers to fill this demand for jobs.
- 4.24 The job growth forecast by EEFM 2014 is in Column 6 of the table above and the resulting housing need figures calculated by Edge in Column 7. In the 2015 study, PBA concluded that this Edge estimate of the job-led housing need provided the best available objective assessment of housing need over the plan period. For the area as a whole this OAN equalled 2,540 dpa – a 15% uplift against the 'demographic starting point'.
- 4.25 In the present update PBA have revisited the calculation of labour market balance, based on a new version of the East of England forecast, EEFM 2016. This time there are no Edge estimates of the housing implications of EEFM, because the EPOA has not commissioned a new phase of the Essex Demographic Forecast. But the gap is filled by the economic forecast itself. While EEFM 2014 only ran to 2031, EEFM now extends to the end of the plan period in 2037 and beyond. And EEFM provides its own figure on job-led housing growth. This figure, labelled 'demand for dwellings' shows how many new homes will be required to house enough workers to meet the forecast demand for labour.
- 4.26 In Table 1, Column 8 shows the job growth predicted by EEFM 2016 for the plan period and Column 9 shows the demand for dwellings that is part of the same forecast. For the three districts together the new forecast shows very slightly lower job growth than the old one – 2,143

net new jobs p.a. against 2,222 in EEFM 2014. It also shows slightly lower housing need, at 2,328 dpa against 2,540 dpa in the Edge report that informed the 2015 OAN study.

- 4.27 Against the demographic starting point (CLG 2014), for the three districts together the updated job-led housing figure represents an uplift of 9%. For each district the job-led figure is greater than the demographic starting point, suggesting that the population growth shown in the official demographic projections would not provide quite enough workers to meet labour demand over the plan period.
- 4.28 Although the EEFM housing demand produces similar results to those from Edge, PBA considered that the EEFM version is technically more robust, because it integrates economic with demographic modelling, using consistent assumptions and methods though the whole analysis.
- 4.29 Given that economic forecasting is highly uncertain, in the 2015 study PBA checked the EEFM / Edge analysis against a second opinion, from Experian. PBA have repeated this exercise using the latest version of Experian's local forecasts, dated September 2016. The results are at Columns 10 and 11 of the Table.
- 4.30 Unlike EEFM, Experian does not forecast the population and housing that would be needed to meet the demand for labour. Rather, it forecasts how many jobs an area will accommodate if population change as shown in the 2014-based official demographic projections; and it estimates whether that population will provide enough workers to meet demand. If the population is not enough, this means that job growth would be constrained by the labour supply resulting from the official projections, and therefore the projections should be uplifted.
- 4.31 From Column 10 of the table it can be seen that for the area as a whole Experian 2016 forecasts show more job growth than EEFM 2016 – 2,522 jobs p.a. (Experian) against 2,143 in EEFM 2016. But in regard to demographic implications the two forecasters disagree. For all three districts, Experian estimates that the officially projected population will be enough or more than enough to meet labour demand over the plan period, so there is no need for a 'future jobs' adjustment.
- 4.32 In the spirit of positive planning, PBA have based their conclusions on the EEFM analysis rather than Experian's, because EEFM implies higher housing need.
- 4.33 As explained in the 2015 OAN report, the market signals uplift and future jobs uplift overlap. Therefore the objectively assessed housing need is the greater of:
 - The market-signals-adjusted figure at Column 5 of the table
 - The future-jobs-uplifted figure at Column 9 of the table.

- 4.34 For the three districts together, these two figures give almost exactly the same answer. The total OAN of 2,441 dpa for the three districts is also very close (within 5%) the 2,540 dpa calculated in the 2015 study.
- 4.35 For Braintree the updated calculation assesses housing need at 716 dpa, against 845 dpa in the 2015 study. Behind this 15% reduction are decreases in both the official demographic projection and the EEFM view of future jobs. Braintree Council may choose to reflect this reduction in its emerging Local Plan. Alternatively it may consider it prudent to leave the target unchanged, given that projections and forecasts are unstable might produce higher numbers in future. For Chelmsford the updated OAN is 805 dpa, close to the 775 dpa in the 2015 study, and for Colchester it remains exactly the same at 920 dpa.
- 4.36 The analysis for Tendring takes a different approach, to correct the severe distortions due to Unattributable Population Change (the UPC). PBA's best assessment of housing need for Tendring over the plan period remains 550 dpa.
- 4.37 **Brexit:**
Since the referendum in June there have been calls for housing targets to be revised. However, the chronic national shortage in new housing supply has been well documented, with housebuilders building nowhere near the 300,000 new homes a year that the recent House of Lords Economic Affairs Committee said was needed just to meet existing demand for housing in this country.
- 4.38 Peter Andrew, deputy chairman of the Home Builders Federation, accepts that it is "too early" to understand all the implications of the Brexit vote for housebuilders, adding that "it is clear that after decades of undersupply we face an acute housing crisis and demand for new homes will remain high."
- 4.39 The difficulty when trying to predict the future, is that no one yet knows what form Brexit will take. Although some market stability has come in the aftermath of Brexit, there are some clear signs that there will be further volatility as the UK's two-year separation from the EU unfolds, which will have an adverse impact on activity levels in the property market. But the inherent undersupply of housing means that property prices are likely to increase further in the medium to long term, even if there is a dip in the short term.
- 4.40 A House of Commons briefing paper issued on 26th August - Brexit: impact across policy areas; states that at the moment, it is very unclear what kind of future relationship the UK might have with the EU and EEA/Swiss states after leaving the EU.
- 4.41 A key question, when considering the impact of leaving the EU on immigration policy and the immigration rights of British and EU/EEA citizens, is to what extent the UK might remain bound by EU free movement of people laws post-Brexit.

- 4.42 Based on the Office for National Statistics' projections, under the low migration scenario (which becomes more likely following Brexit) the population of the UK would be smaller by 1.06 million people in 10 years compared to the principal forecast. Lower immigration would mean less people looking for accommodation which would reduce the demand for housing. According to the Census 2011, there were 2.68 million people born in other EU countries living in the UK. At the time of the census, 8.7% of the London's residents were born in other EU countries, and approximately 3.6% of residents in the East of England were from the EU.
- 4.43 Leaving the EU means that the UK could set its own criteria for deciding which EU citizens can be admitted to the UK. This is assuming that it did not negotiate a future agreement with the EU (or certain Member States) which required the continued application of free movement law. The UK's approach to controlling EU migration is likely to be informed by broader considerations of the national interest, including the extent to which it wants to continue to attract certain types of migrant to the UK and ensure that British citizens have continued access to EU states, and whether it wants to continue to have access to the single market. It is not yet clear if the UK will be able to apply different visa requirements to different EU nationalities (as it currently does for visitors from non-EU states.)
- 4.44 It is still uncertain what shape the UK's immigration policy will take. It is possible that visas or residence permits would be granted to EU nationals currently living in the UK and that an application system would be set up for those wishing to relocate to the country. This may take a form similar to the current visa system for non-UK non-EU citizens.
- 4.45 At a recent Planning for Housing conference, Bob McCurry, planning director at consultancy Barton Willmore, told the conference that current UK housing projections are based on an in-migration figure of 180,000 a year. Yet for a few years in-migration had been at a level of 330,000 a year, he said. "There is a disparity there of about 150,000 people in migration terms that is not included in our housing projections," he said.
- 4.46 He argued that this meant that in-migration would need to fall by at least that figure to alter the current need for "potentially 300,000 homes a year".
- 4.47 There is still much uncertainty about changes to net EU migration and any changes will not happen immediately. It is however reasonable to conclude at this point in time that the need for new housing in Colchester is unlikely to change significantly in the plan period.
- 4.48 **Government Statements**
The Conservative Party conference saw government ministers set out clear plans to focus on housing by facilitating the neighbourhood

planning process, putting pressure on developers to speed up delivery and radically increasing brownfield development.

- 4.49 Even ahead of Prime Minister Theresa May's conference address, her promise that her reshaped government would do "far more" to provide sufficient homes of sufficient quality dominated the proceedings and a new housing white paper is expected to be published later this year. Also speaking at the Conservative Party conference, communities secretary Sajid Javid pledged to take "unprecedented steps" to boost housing delivery, saying housing is his "number one priority" and that tackling the housing crisis is a "moral duty". "Everyone agrees we need to build more homes, but too many of us object to them being built next to us. We've got to change that attitude", Javid said. The minister said that councillors and MPs have to be "prepared to make difficult calls, even if they're unpopular". He also said that big developers have to release their stranglehold on supply: "It's time to stop sitting on landbanks and delaying build-out. Home buyers must come first." He said the government wants to "radically increase" brownfield development and secure a higher density of housing around stations.
- 4.50 While planning permissions are coming through more quickly now, the local picture is patchy and ministers remain frustrated with councils who have still do not have Local Plans in place. Sajid Javid used an eve-of-conference interview with the Financial Times to warn that he would "be very tough" with councils that fail to identify enough land for housing.
- 4.51 A deadline of early 2017, by when councils have been told they must have completed this process or face intervention from the Secretary of State, is fast approaching. It remains slightly unclear precisely how the Government intends to intervene, however. Some councils argue that they simply do not have the land but there are some which are susceptible to lobbying by local residents. Javid clearly had this in mind when he told councils they were there to make "the right decisions, not the easy ones".
- 4.52 A series of new amendments to the Neighbourhood Planning Bill, which is currently at committee stage, have been tabled by the planning minister Gavin Barwell. One new clause tabled by the minister would allow the secretary of state to "give a direction requiring two or more local planning authorities to prepare a joint development plan document", according to an explanatory statement.
- 4.53 Another new clause tabled by Barwell would "enable the secretary of state to invite a county council to prepare or revise a development plan document in a case where the secretary of state thinks that a district council in the county council's area is failing to prepare, revise or adopt such a document". He explained that the provisions were "not powers that I anticipate using a lot but I think their existence will focus minds and ensure that we get plans in place". Barwell said that the amendment is "confirming there's a statutory duty to have local plans in place".

4.54 A briefing paper for the House of Commons Library is attached as Appendix 2. This provides a useful overview of planning and housing issues.

4.55 The Consequences of lower targets

A report by Nathaniel Lichfield & Partners – Positive preparations, a Review of housing targets and Local Plans, in March 2014 found that producing objectively assessed housing figures had been a cause for delay in making local plans. They reviewed 109 local plans submitted or examined since the NPPF was introduced and confirmed housing targets were the key issue at examination and the main reason plans are stalled. A third of plans found sound had to increase their housing target to pass the examination.

4.56 Research in 2015 looked at the impact of acknowledged shortfalls of housing supply on major housing appeals for 298 schemes involving more than 50 residential units determined since the introduction of the NPPF. While this analysis shows an almost equal split between appeals allowed and dismissed, the proportion dismissed rose to 62 per cent where an up-to-date local plan was in place. Critically, inspectors identified five-year housing land supply as a material factor in 54 per cent of the appeals allowed.

4.57 These findings support the view that councils' housing land supply evidence does not always bear scrutiny. Inspectors are giving considerable weight to five-year housing land supply in their decisions. For both plan-making and decision-taking, it is imperative that local authorities adequately assess and identify a deliverable supply of housing land. In total, 20,000 homes were granted consent through the planning appeal process last year.

4.58 It is clear that adoption of an up-to-date plan offers greater protection to councils in an appeal situation; where an up-to-date plan is in place, it is based on up-to-date evidence, including a SHMA, and therefore makes adequate provision for the area's housing need. The NPPF is working to some degree in both protecting planning authorities against unsustainable development and promoting growth to meet housing need.

4.59 In terms of plan making, the implications of not meeting an Objectively Assessed housing Need are clear and the following examples shed more light;

1. Castle Point

In 2011, the Council received some clear advice from a Planning Inspector examining its then proposed Core Strategy. It was to re-examine its approach to housing supply and in particular its approach to the Green Belt. In the light of the uncertainty surrounding strategic planning at that time the Council resolved to withdraw the Core Strategy, and start work on a New Local Plan. An issues consultation was launched in 2012. By 2013 the

Council had drafted a plan which it believed complied fully with the NPPF, and published this in 2014. In 2016, and following consideration of all of the responses received to the Draft New Local Plan consultation, the Council published the New Local Plan for submission. The plan includes provision for just over 2,000 homes in the period to 2031, but acknowledges that there is a need for 8,000 homes per annum over the same period. In September the new Inspector once again wrote to Castle Point because he had concerns about housing numbers and the duty to co-operate. The inspector has asked for further information on how the council has explored options for providing for unmet need and what the council's rationale was for reducing the housing requirement between the two versions of the plans. The Council's current Local Plan was adopted in November 1998. It was saved in its totality until 28th September 2007. Since that date only certain policies are still being used in decision making, creating very uncertain framework. Appeals are being allowed because of the current under-supply of housing sites.

2. Uttlesford

Between 2007 and 2014 the District Council consulted on a Core Strategy which was incorporated in to the Draft Local Plan. On 4 July 2014 the Local Plan and its supporting documents were submitted for independent examination to the Secretary of State for Communities and Local Government via the Planning Inspectorate. The Local Plan Examination was programmed for 18-21 November and 2-5 December 2014. The Inspector halted the Examination on 3 December. Further to the Inspector's comments on 19 December, that the submitted plan did not provide for a full PPG-compliant Objectively Assessed Need Uttlesford DC officially withdrew its Plan in January 2015. At least 12 appeals are currently in progress for residential development. The adopted plan which dates back to 2005 has been found to be partly in conflict with the NPPF.

3. Tendring

Members will have seen for themselves the number of planning appeals in Tendring district which have come about as a result of there being no up to date plan and no 5 year housing supply.

4.60 At paragraph 4.53 above reference is made to the possibility of county councils preparing local plans. The Government is currently taking the Neighbourhood Planning Bill through the House of Commons and reference is made therein.

4.61 On Wednesday 19 October, the Government, tabled an unexpected amendment to the Bill to introduce a new clause and accompanying schedule to enable the Secretary of State to invite a county council to prepare or revise a development plan document in a case where the Secretary of State thinks that a district council in the county council's area is failing to prepare, revise or adopt such a document. The detail indicates that districts would be responsible for certain costs incurred by the County Council in carrying out this function.

- 4.62 The District Council Network (DCN) will oppose the new clause and will set out its significant concerns in relation to the wider principle of locals plans, the lack of capacity or expertise in County Councils, how it would work in practice and the financial implications for districts. The DCN issued an immediate comment to the trade press as follows which sets out it's response to this proposal.

Cllr Gillian Brown, DCN lead member for planning, said:

The District Council Network has particular concerns around New Clause 5 which would give the SofS powers to intervene and ask County Council to prepare or revise existing local plans. County Councils are not planning authorities and therefore do not have the planning expertise required to discharge this proposed function which could lead to increased delays in the overall local plan process, in direct contrast to the Government intention. Additionally the financial costs of preparing local plans are significant and this proposal could lead to further additional costs which would adversely impact on the existing planning capacity of district councils....

- 4.63 Clearly this is a worrying development and reinforces the need for Colchester Borough Council to progress its own local plan.

5. Proposals

- 5.1 The Local Plan Committee is asked to note the updates to the Objectively Assessed Housing Need Study and other relevant commentary.

6. Strategic Plan References

- 6.1 Effective strategic planning supports the Strategic Plan Action Plan which includes a commitment to make Colchester a vibrant, prosperous, thriving and welcoming place.

7. Consultation and Publicity

- 7.1 N/A.

8. Financial Implications

- 8.1 None.

9. Equality, Diversity and Human Rights Implications

- 9.1 An Equality Impact Assessment has been prepared for the Local Plan and is available to view by clicking on this link:-

<http://www.colchester.gov.uk/article/4962/Strategic-Policy-and-Regeneration>

or go to the Colchester Borough Council website

www.colchester.gov.uk and follow the pathway from the

homepage: Council and Democracy > Policies, Strategies and Performance > Equality and Diversity > Equality Impact Assessments > Strategic Policy and Regeneration and select Local Development Framework from the Strategic Planning and Research section.

9.2 There are no particular Human Rights implications.

10. Community Safety Implications

10.1 None

11. Health and Safety Implications

11.1 None

12. Risk Management Implications

12.1 None.

13. Disclaimer

13.1 The information in this report was, as far as is known, correct at the date of publication. Colchester Borough Council cannot accept responsibility for any error or omission.

APPENDIX 1

Change p.a. 2013-37	ONS / CLG projections		Trends 2005-15	Market signals		Edge Phase 7		EEFM 2016		Experian 2016		Updated OAN	
Column No	1	2	3	4	5	6	7	8	9	10	11	12	13
	Dwellings 2012-based	Dwellings 2014-based	Dwellings	Uplift	2014-based dwlgs+ uplift	Jobs (EEFM 2014)	Dwellings (Edge)	Jobs	Dwellings	Jobs	Constrained by ONS 2014?	Dwellings	Change from SHMA
Braintree	687	623	507	15%	716	608	845	490	702	461	No	716	-129
Chelmsford	657	671	429	20%	805	1,013	775	725	706	952	No	805	30
Colchester	870	866	1,207	0%	866	601	920	928	920	1,109	No	920	0
Three districts	2,214	2,160	2,143	11%	2,388	2,222	2,540	2,143	2,328	2,522		2,441	-99

Source: ONS, CLG, Edge Analytics, EEFM, Experian, PBA.

Table 1 Summary assessment: Braintree, Chelmsford and Colchester