

Our Ref: VJS/cjd/JCG17038
Your Ref:

E-mail: valerie.scott@cgms.co.uk
Date: 10 August 2016

Mr M. Moore
The Planning Inspectorate
Room 3/B
Temple Quay House
2 The Square
Temple Quay
Bristol BS1 6PW

Dear Mr. Moore,

OFFICE FOR NATIONAL STATISTICS PUBLISHED 2014 – BASED SUB- NATIONAL POPULATION AND HOUSEHOLD PROJECTIONS FOR CANTERBURY DISTRICT

We write on behalf of O.W. Presland Ltd in response to your invitation, via an email from the Programme Officer dated 13 July 2016, to comment on any implications the recently published 2014 – based Sub-National Population and Household Projections may have for the Canterbury District Local Plan.

We attach our response overleaf.

If the Inspector decides to hold a further hearing into these matters we would like, if possible to be heard.

Yours sincerely,

VALERIE SCOTT
Director

Enc.

cc: Angela Furlong, Programme Officer (by email)
Mario Balducci, Kitewood (by email)
Sara Sweeney, Kitewood (by email)
Karen Britton, Planning Policy Manager, Canterbury City Council (by email)

**CANTERBURY LOCAL PLAN – 2014 BASED SUB-NATIONAL POPULATION AND
HOUSEHOLD PROJECTIONS
REPRESENTATIONS ON BEHALF OF O.W. PRESLAND LIMITED**

1.0 INTRODUCTION

- 1.1 On the 25 May 2016, the Office of National Statistics (ONS) published the 2014 – based Sub National Population Projections (SNPP). These update the earlier ONS 2012 – based SNPP and provide projections of population change for all Local Authorities over the period 2014 to 2039.
- 1.2 On the 12 July 2016, the Department of Communities and Local Government published 2014-based Sub-National Household Projections (SNHP) based on the earlier population projections.
- 1.3 These projections represent new information of potential future population and household changes within Canterbury District and as such may have implications in relation to the housing needs identified for the District as part of the evidence base for the Local Plan and on the potential of Canterbury District to meet their 5 + year Housing Land Supply.

**2.0 CHANGES TO POPULATION AND HOUSEHOLD GROWTH BASED ON 2014
BASED SNPP AND SNHP**

- 2.1 The 2014-based SNPP for Canterbury projects an increase in population of 31,625 people in the District between 2014 and 2039. This is a higher level of population growth than in the previous 2012 – based SNPP which projected population growth of 20,839 over the period 2012 – 2037. This is circa 10,000 increase in population over the period to 2039, which over the 25 year period would not be particularly significant on an annual basis.
- 2.2 The 2014 – based figures for household projections published by CCC on 12 July 2016 now estimates the following household figures for the Canterbury District:

2016: 65,000
2031: 75,000
2039: 83,000

2.3 The 2012 based figures published on 27 February 2015 were as follows:

2016: 63,000

2031: 73,000

2039: 77,000

2.4 This indicates a higher rate of growth with the 2016 figures predicted to be 2,000 more households than shown in the 2012 based projections.

2.5 The growth between 2016 – 2031 (Local Plan period) for the 2014 – based figure is now 12,000 new households over this 15 year period compared to 10,000 new households on the 2012 – based figures. This represents an increase in growth of 133 dwellings per annum, which over a five year period could potentially result in a housing need of 666 new dwellings.

2.6 The Council have not as yet advised whether they propose to update their objectively assessed housing needs to reflect these new household projections. The Plan as modified currently aims to provide 800 dwellings over the plan period (2011 – 31) and a need for 4,624 dwellings for the 5 year residual requirement x 5% buffer (2015/16 – 2019/20).

Comments

2.7 We anticipate that during the period of the plan there may be a further need for new housing than that currently being programmed as part of the Local Plan and in these circumstances consider that it would be helpful if there could be increase flexibility built in to the Plan particularly in relation to the release of small to medium housing sites where delivery could be achieved without the need for significant infrastructure.

2.8 We do however, consider that some sites already proposed for allocation as part of the Plan could come forward more quickly than as shown in the Council's 5-year land supply forecast and in terms of the site proposed to be developed by O.W. Presland on land south of the John Wilson Business Park we anticipate delivery of 250 of the 300 dwellings within the first five years as opposed to only 80 dwellings shown in the Council's 5-year land supply forecast.

- 2.9 In order to speed up delivery of new housing in Canterbury District we consider that it is extremely important that there should be no delay to the adoption of the Local Plan in terms of any need to review the housing need figures. The Local Plan is now at an advanced stage of the Examination and rather than causing delay to this process we consider that the best way to provide for any additional housing need would be to require an early review of the Local Plan as a modification. This approach is consistent with the Council's comments as set out in their statement sent with their letter dated 14 June 2016 in response to the 2014 – based SNPP.
- 2.10 We also consider that this would be in line with the advice set out in the National Planning Policy Framework (NPPF) and Planning Policies Guidance (PPG).
- 2.11 Whilst the PPG at ID:2A-2016 states that local needs assessments should be informed by the latest available information, the NPPF states that a meaningful change in the housing situation does not mean that housing assessments are rendered outdated every time new projections are issued.
- 2.12 The PPG at ID:2A-017 – 20140306 states that plan makers may consider sensitively testing, specifically to their local circumstances, based on alternative assumptions in relation to the underlying demographic projections and household formation rates. This goes on to highlight some of the local issues that might be considered e.g. expansion in education or facilities for older people. Impact in relation to the large student population in Canterbury is particularly relevant in terms of predicting future housing need.
- 2.13 These local matters will need to be taken into account when considering the need for more housing in the district and an increase in population and household projections may not necessarily in a significant need for more housing than that which has already been considered following which we consider to be a very robust housing needs assessment albeit using 2012 based ONS figures.
- 2.14 For all of the above reasons we would urge the Inspector not to consider any further postponement of the Examination to enable a new Housing Needs Assessment to be carried out but to seek an early review of the Local Plan to take account of this new information.