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Dear Charlotte

Thank you for the letter from the Inspector (EX 112) setting out his further questions with respect to the latest household projections published in September 2018 and the further consultation issued by the Government on 26 October 2018.

Our response to the Inspector's questions is set out below.

Q. The actual figures associated with the higher demographic starting point for Breckland referred to in the Council's response and with regard to the wider housing market area are provided.

A. Table 1 below sets out the figures for Breckland and the other authorities in the Housing Market Area derived from the standard housing methodology utilising the 2016 based household projections.

**Table 1 – Standard Housing Methodology derived from the 2016 based household projections**

Local Authority	Dwellings Per Annum
Breckland	770
Broadland	451
Norwich	409
North Norfolk	438
South Norfolk	895

For comparison, Table 2 sets out the figures calculated from the latest consultation version of the draft guidance on standard housing methodology published by the Government on 26 October 2018; and the original draft standard housing methodology figure published by the Government in September 2017.

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**Table 2 – Standard Housing Methodology derived from 2014 based household projections**

<b>Local Authority</b>	<b>October 2018</b>	<b>September 2017</b>
Breckland	697	680
Broadland	544	528
Norwich	543	511
North Norfolk	604	602
South Norfolk	918	922

Q. The Inspector also requests the view of the Council whether this represents a meaningful change.

A. Whilst there is no specific definition of what constitutes a meaningful change in the Planning Practice Guidance, the Council would consider that the figure set out in Table 1 above (770 per annum) does represent a meaningful change representing an increase of some 25.8% compared to the current plan requirement of 612 per annum.


Q. Further, he is also requesting that the Council provide its view with regard to the relevance of the current Government consultation on the standard housing methodology and the Government's view/analysis within the consultation document on the 2016 household projections.

A. The current consultation on the standard housing methodology, utilising the 2014 based household projections, would yield a lower figure for Breckland (697) compared to the figure generated by the 2016 based household projections (770). This figure is 13.9% higher than the plan requirement of 612 dwellings per annum. In terms of relevance, it is important to note that the current consultation states:

"The use of the standard method applies to plan-making for plans submitted on or after the 24 January 2019. Any period specified for using the 2014-based projections would use this as the start date."

It is clear that the application of the standard method is applicable to local plans yet to be submitted. As a result, it is the view of the Council that the need to consider the application of the standard housing method would therefore be required as part of an early review of the Local Plan.

Yours sincerely



Stephen Ottewell  
Director Planning & Building Control Capita Local Public Services