

HS Response to Government Consultation on Updates to National Planning Policy and Guidance December 201

Q1: Do you agree that planning practice guidance should be amended to specify that 2014-based projections will provide the demographic baseline for the standard method for a time limited period?

NO

The Heswall Society strongly disagrees that the 2014 base projections should be used even for a time limited period. The 2016 base ONS projections are lower for two main reasons: population projections and trends in household formation (household size)

Population projections - These relate to real and natural changes such as lower births and less improvement in life expectancy and lower migration and there is no basis for using other than the most up-to-date figures. The reduced population projections account for **over half the difference** between the 2014 and 2016 base household projections. There can be no basis for dismissing new population forecasts as would be the case if the 2014 base household projections continue to be used, even in the short term. Furthermore, the difference between the 2014 and 2016 base population projections varies across the country. To use projections which are spatially incorrect would not make a proportionate and rational allocation of housing needs across the country and would not support the Government's objective of "the right homes in the right places". To use the old population forecasts will result in plans which do not address local needs.

Household Formation - The consultation argues that household size is constrained by the availability of houses and that is why household formation projections are not a satisfactory basis for assessing the need for homes. Even so it proposes to still continue to rely on 2014 base household projections in the short term. It is imply unscientific and arbitrary to continue to use the superseded 2014 base projections.

Trends in household formation are highly variable across the country, especially between the Home Counties and the North. In the former there is a particular issue about the low and declining household formation of 25-34 year olds. In contrast, in many parts of the North, the issue is one related to an ageing population requiring smaller houses for one / two people. There are areas in the North where populations are forecast to fall - clearly there is no constraint here on the formation of households. There are areas, such as Wirral, where after many years of population decline, although there has been a degree of stabilisation, current and forecast populations are substantially below historic levels. The 2014 household size projections are based on very old figures and have been set aside by ONS for very good reason. Outdated figures based on discredited projections should not be used simply to arrive at the required

overall total if the spatial distribution is distorted as a consequence. Once again it would result in not providing the right amount and type of house in the right place.

Housing needs assessments must be based on up-to-date data to ensure they reflect local needs in terms of the number type and size of homes.

The Heswall Society also questions whether the 300000 homes per year target is justifiable. It has to be assumed that this is based on population figures which are not supported by the new projections.

In addition to not leading to “the right homes in the right places”, using figures which are clearly excessive and outdated is inappropriate in developing Local Plans and informing decisions about the need for release of Green Belt.

Q2: Do you agree with the proposed approach to not allowing 2016-based household projections to be used as a reason to justify lower housing need?

Having explained why the 2014 population projections should not be used in answering question 1, we would reaffirm that the only rational basis for ensuring “the right homes in the right places” is to use the 2016 base population figures. These are projections of natural changes such as births and deaths. Using superseded population projections is unlikely to achieve the Government’s objective. Similarly not taking account of the latest projections of household size will not achieve the “right homes in the right places”.

Q3: Do you agree with the proposed approach to applying the cap to spatial development strategies?

We agree with the principle that the cap should be applied in this manner. However the need to create a cap points to a deficiency in the Standard Method.

Q4: Do you agree with the proposed clarifications to footnote 37 and the glossary definition of local housing need?

No

The 5 year housing land supply should include sites in the Brownfield Register and sites with any form of planning permission. We are also concerned about inadequacies in the Brownfield Register. There are extensive areas of brownfield land with outline planning permission which do not appear on the Brownfield Register in our local area because “As all matters are held in reserve, it has not been possible to identify a specific boundary for an a minimum number of additional new housing units”. In our experience large areas of brownfield land are not being recognised.

Q5: Do you agree with the proposed clarification to the glossary definition of deliverable?

The changes are far from adequate.

The “clarification” relates to the annually updated list of supply of “specific deliverable sites”

Approved planning applications on a list of specific deliverable sites may have been approved one to two years before the list is compiled. At the time of approval detailed planning applications have a life of 3 years. A typical small scheme might be completed and all houses delivered within 3 years of approval. Very small projects might be completed more quickly. This means that many projects which will deliver in the last two years of a five year list will not have permission when the plan is approved. The list needs to be much more flexible.

In our view the wording should recognise the ruling from Judge Lindblom, October 2017 (East Riding v St Modwen) which stated that to be deliverable, a site has to be capable of being delivered within 5 years, but it does not need to be certain or probable that the site actually will be delivered within five years. He added: “The fact that a particular site is capable of being delivered within five years does not mean that it necessarily will be.

Question 6

Do you agree with the proposed amendment to paragraph 177 of the National Planning Policy Framework?

No.

We are concerned that the insertion of the word “significant” is too loose and open to a weakening of protection. We look to the maintenance and strengthening rather than the weakening of environmental protection.