

Consultation response form

This is the response form for the technical consultation on updates to national planning policy and guidance. If you are responding by email or in writing, please reply using this questionnaire pro-forma, which should be read alongside the consultation document. You are able to expand the comments box should you need more space. Required fields are indicated with an asterix (*)

This form should be returned to:
planningpolicyconsultation@communities.gov.uk

Or posted to:

Planning Policy Consultation Team
Ministry of Housing, Communities and Local Government
2nd floor, South East
Fry Building
2 Marsham Street
LONDON
SW1P 4DF

By 7 December 2018

Your details

| | |
|------------------------|--|
| First name* | David |
| Family name (surname)* | Ball |
| Title | Assistant Director, Major Growth Projects and Housing Delivery, Wirral Council |
| Address | South Annexe, Brighton Street, |
| City/Town* | Wallasey |
| Postal Code* | CH44 8ED |
| Telephone Number | 0151 691 8395 |
| Email Address* | davidball@wirral.gov.uk |

Are the views expressed on this consultation your own personal views or an official response from an organisation you represent?*

Organisational response

If you are responding on behalf of an organisation, please select the option which best describes your organisation.*

Local authority (including National Parks, Broads Authority, the Greater London Authority and London Boroughs)

If you selected other, please state the type of organisation

Click here to enter text.

Please provide the name of the organisation (if applicable)

Wirral Council

Local housing need assessment

The Government's proposed approach

Question 1

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

While the policy impacts of the 2016-based projections as a result of the changes in the methodology by the ONS have been widely reported and are reflected in paragraph 11, the consultation paper arguably goes too far in critiquing the use of the household projections generally as a basis for calculating minimum housing need (paragraph 11-18 refers). While reverting to the 2014-based projections would address the policy impact of the methodological changes introduced by ONS, they would not address the other limitations with the use of household projections alone as a basis for planning, which the Government highlights in the consultation document. As household projections are the cornerstone of the standard method, the Government's approach risks undermining the credibility of the standard method in its current form as a basis for calculating minimum housing need as well as the credibility and reliability of statistics produced by ONS, by questioning the inputs to the method, when the results do not appear to suit a particular agenda. It also does not allow for the possibility that at local authority level, the 2016-base projections may still be a credible basis for calculating minimum housing need at a district level (see response to question 2). The criticism of household projections in general and the reference in paragraph 19(3) to reviewing the formula (at some unspecified time in the future) will not provide the certainty and stability for Local Planning authorities and communities which the Government is looking to achieve (paragraph 18 refers). The Government's approach will also increase the likelihood of challenges at Local Plan Examination that any calculation of minimum housing need based on the standard method (irrespective of which projections are used) is too low, irrespective of any local adjustments for affordability etc. NPPF paragraph 60 already states that housing should be "informed by" the standard method "unless exceptional circumstances justify an alternative approach...". It is therefore recommended that final decisions on the figures to be used, including any variance from the outputs from the standard method should be retained at local level, with the backstop of scrutiny at public examination.

Clarifying that 2016-based projections are not a justification for lower housing need

Question 2

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?

No

While the national minimum housing need has fallen significantly as a result of the 2016-based projections, strongly disagree that a blanket approach which discounts these projections as relevant evidence should be adopted, given that the Government has not undertaken an assessment of whether the 2016-based projections do or do not provide a sound basis for planning at an individual local authority level. The Council has commissioned the University of Liverpool to assess both the 2014 and 2016-based household projections (along with other alternative calculations based on previously recorded trends put forward during a recent public consultation), which will produce recommendations as to which provides the most appropriate basis for calculating the Borough's minimum housing need. It is therefore unreasonable to rule out the 2016 base projections as basis for calculating minimum housing need if there is a strong evidential case that they are reliable at a specific local authority level. Directing that Councils should effectively ignore the latest available information is contrary to the principle embedded in the NPPF at paragraph 31 that "The preparation and review of all policies should be underpinned by relevant and up-to-date evidence..." The Council wishes to be able to adopt the most up-to-date 2016-based household projections (which result in a minimum requirement of 488 dwellings per year) as a basis for assessing its future housing needs.

Applying the cap to spatial development strategies

Question 3

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

Yes

Click here to enter text.

Housing land supply

Question 4

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

Yes

Click here to enter text.

The definition of deliverable

Question 5

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

Yes

Click here to enter text.

Development requiring Habitats Regulations Assessment

Question 6

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

Yes

Click here to enter text.