

Appendix A:

Recommended response Technical consultation on updates to national planning policy and guidance, MHCLG October 2018

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?

Wokingham Borough Council strongly objects to the use of the 2014-based projections as the demographic start point for calculating Local Housing Need.

As a matter of principle, it is unsound and unprofessional to disregard up-to-date information and continue to use old information in any calculation of future needs. In all instances, up-to-date information should always form the starting point in any analysis, with adjustments made from that point where necessary.

Government policy on housebuilding to deliver 300,000 homes a year by the mid-2020s does not represent an objective assessment of future housing needs – it is a ‘policy on’ position. The consultation document itself acknowledges that the most recent population projections show population growth to be slower than previously expected.

The arguments put forward in the consultation simply do not justify the approach.

1. The standardised methodology would result in more homes being provided above the level of projected growth in households. This will help address the needs of ‘hidden’ households.
2. The use of two Census points within the 2016-based projections to consider trends is robust. Whilst a lesser period than previously used, it is sufficiently long to mitigate short term trends, whilst also sufficiently short to reflect actual changes in society. The use of five census points considerably dampens down actual social change.
3. The increase in average household size cannot be assumed to solely relate to access for housing. As referenced above, social change will influence this, including the differences in cultural approach to family.
4. Social changes cannot be assumed to be a reflection of no choice. Social change can be reflective of positive choices by individuals and families, for example reflecting flexible employment practices, caring for elderly relatives, or living in social groups.
5. Affordability will not be addressed by simply building more homes. Access to finance has a greater impact on house prices than supply, as will access to alternative housing tenures. If people can borrow more, house prices go up. If people cannot afford more, house prices remain static or decrease. The actions by Government to support house sales act to increase the cost of housing.

Should the Government wish for policy reasons to deliver 300,000 homes per year, it should seek to influence policy making through positive incentives such as Housing Deals and Infrastructure Funds. As stated above, it is unsound to bring a ‘policy on’ position into objective evidence.

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?

Wokingham Borough Council objects in principle to the use of the 2014-based projections as the demographic start point for calculating Local Housing Need for the reasons set out in our response to Question 1. As such, the 2016-based household projections should form the demographic starting point, with no need to consider them to form exceptional circumstances.

Q3:

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

Wokingham Borough Council welcomes the move to clarify the position regarding how the cap to increases in Local Housing Need is applied in the situation of joint plans.

Wokingham Borough Council objects, however, to the way the cap is applied. Whilst supporting the principle of applying the cap to ensure the output is realistic and deliverable, the application of a cap to the plan allocation is unreasonable. There will be many instances where a plan allocation represents an agreement for housing to be restricted in one authority and increase on another; that is the allocation represents a 'policy on' position made in the circumstances of a particular time. It is not acceptable for some local planning authorities to see the housing requirement capped against an objective 'policy off' position, whilst others are capped against a 'policy on' position.

By way of illustration, the Wokingham Borough Council adopted Core Strategy target (which evolved from the now revoked South East Plan) includes 2,500 dwellings on behalf of the greater Reading area. Since this time, Reading Borough Council has delivered a greater amount of housing than that envisaged. Applying the cap to Wokingham Borough on this basis therefore presents a 'policy on' approach and fails to reflect an objective assessment of local need and recent delivery.

We strongly request that the cap is applied only to the household projections, to ensure a 'policy off' approach so that all local authorities are treated consistently.

Q4:

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

Wokingham Borough Council welcomes the proposed clarification.

The issue the Government is seeking to address was raised in our response to the draft revised National Planning Policy Framework and we are glad that our concerns over the ambiguity have been recognised. It is unacceptable for alternative methodologies towards calculating need to be raised outside of the plan making process. To not close this ambiguity risks significant public funds being unnecessarily used in the determination of planning applications and appeals.

Q5:

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

Wokingham Borough Council welcomes the move to clarify that non-major developments benefiting from outline planning permission are in principle deliverable.

Wokingham Borough Council objects, however, that major developments that benefit from outline planning permission are not similarly defined as deliverable. Whilst we accept that developments involving hundreds of homes will not necessarily all be delivered within a five year period, the proportion that can be anticipated to be delivered, based on information from the landowner/developer or on historic delivery trends, should similarly be deemed deliverable unless there is clear evidence to the contrary.

We have undertaken research of development lead-in times in Wokingham Borough. Our records show that sites with outline planning permission can be expected to see housing completions an average of 31 months from the date of planning permission being granted. Lead-in times on sites between 10 and 49 dwellings were considerably quicker at 25 months. Sites with outline planning permission can clearly be expected to see completions within the five year period.

There is no evidenced justification for excluding any site with outline planning permission from being deliverable unless there is clear, site specific evidence.

Q6:

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

Wokingham Borough Council notes the proposed amendment which is intended to bring the NPPF in line with the ruling of the European Court of Justice case C323/17 (People over Wind, Peter Sweetman v Coillte Teoranta).

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