



Planning Advisory Service



Making the numbers work

Can we agree a housing number ?

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www.pas.gov.uk

This session

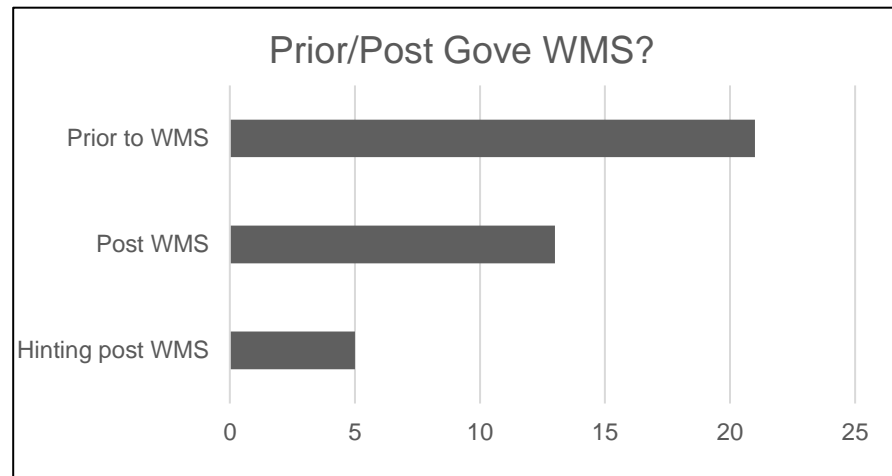
- Housing numbers – need and requirement
 - LURB / NPPF Reforms Consultation
 - One LPA's story
 - Local circumstances – how would you go about it?
 - Winners and losers - what's the 'least worst' way of doing this?
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The context



Councils delaying, slowing, stopping their Local Plan:

- **Rhetoric:** Some slowing down
- **Truth:** Many ploughing ahead

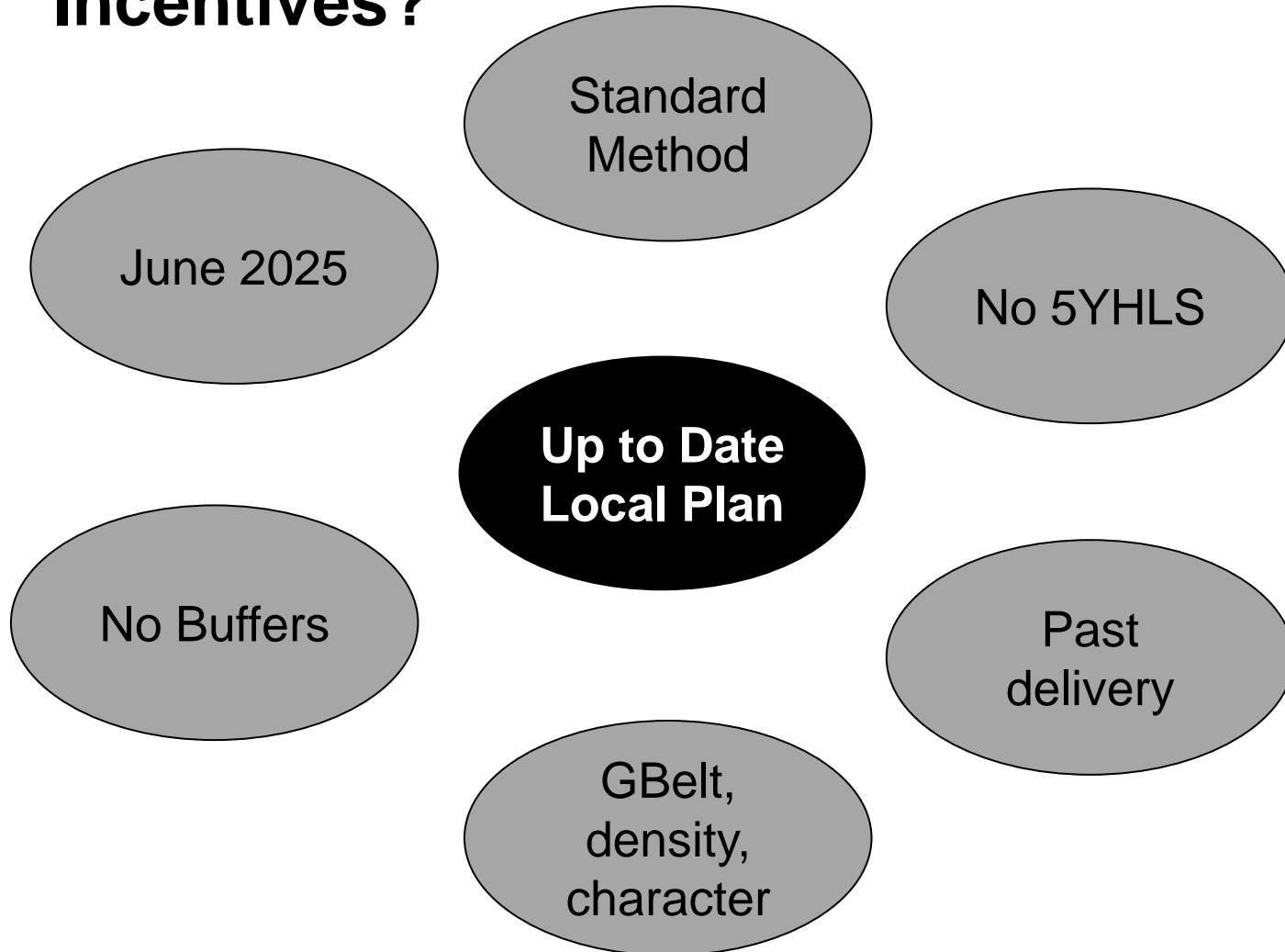


- **Numbers** are at the heart of the matter whether slowed, stopped or ploughing ahead

The consultation

We will... make clearer in the Framework that the outcome of the **standard method is an advisory starting-point** to inform plan-making. The reforms consultation: ‘... also propose to give more **explicit indications** in planning guidance of the types of **local characteristics** which may **justify the use of an alternative method**, such as islands with a **high percentage of elderly residents**, or university towns with an **above-average proportion of students**’.

Incentives?



The consultation

- LHN = standard method
- Starting point
- 'alternative approach' in exceptional circumstances

Not Changing



- Standard Method = 'advisory'
- Departures from standard method - local characteristics - more explicit

Changing?



Q.8: *Do you agree that policy and guidance should be clearer on what may constitute an exceptional circumstance for the use of an alternative approach for assessing local housing needs? Are there other issues we should consider alongside those set out ?*

Need Vs Requirement

- Stage 1 - “**Need**” = Nationally evidenced (‘Standard Method’)
- The starting point for every local plan

= *n*

- Stage 2 - “**Requirement**” = Locally evidenced
- Take *n*, consider land availability, constraints, market and other local factors and arrive at:

= *r*

- ***r* = the requirement that the local plan will set out to deliver**
-

A quick story... how easy is all of this?

OAN using Standard Method = 822.

We don't like this because:

- Past 'over' delivery
- Infrastructure hasn't caught up (our place needs a rest!)
- AONB
- Water stress

Cabinet has agreed:

'...to establish an alternative to the standard method, and to establish whether the housing requirement should be less than housing need based on constraints...'

A quick story...

Scenarios to consider:

- Using different demographic projections; and
- Not applying the standard method's affordability uplift

Plus:

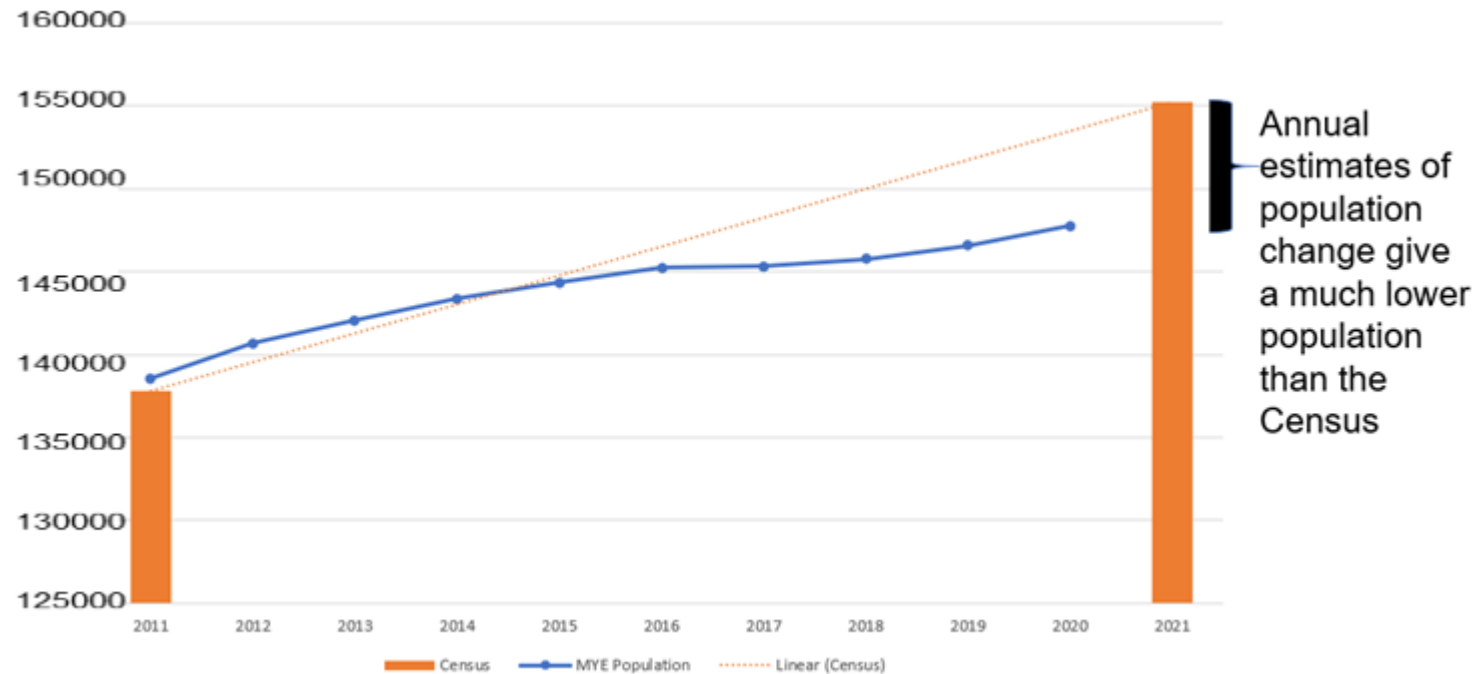
An independent study on constraints – including infrastructure

A quick story...

Table 2 Household estimates

<i>Scenario</i>	<i>2020</i>	<i>2040</i>	<i>Annual average change</i>
1. Standard Method	68,921	88,526	822
2. 2014-based projected estimate	74,022	86,519	626
3. 2016-based projected estimate	72,149	81,231	452
4. 2018-based projected estimate	70,897	74,732	237
5. Natural growth only 2018-based	70,897	74,699	184
6. 2011 to 2021 Census based projection	72,864	94, 526	1,098
7. Alternate 2011 to 2021 Census projection	72, 864	88,526	497

Could we use more recent data and get a lower housing number?



Probably not... the annual population data (the 'Mid Year Estimates') may underestimate the population in the latter part of the decade. Results in need for 1,098 dwellings pa (without affordability uplift).

Case study summary

- Standard Method requirement is **822 dwellings per annum**.
 - Consultant's view - **no exceptional circumstances**. A departure from the Standard Method could be **risky**.
 - Alternative approach to housing numbers may be based on different **household projections**. Migration data is key.
 - **Recent Census nationally-produced population estimates may contain errors**. Treat this data with caution. Expect data to be 'rebased' in May 2023.
 - **Specific modelling** based on the changes recorded between the Census years appears to result in a **higher housing requirement**. **Possibly** uplifted by one-off migration linked to Covid. Extent of effect uncertain.
 - Risk of making assumptions with currently available data. **More data will become available over the next 18 months** that will prove or disprove any approach.
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The consultation



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Q.8: Do you agree that policy and guidance should be clearer on what may constitute an exceptional circumstance for the use of an alternative approach for assessing local housing needs? Are there other issues we should consider alongside those set out ?

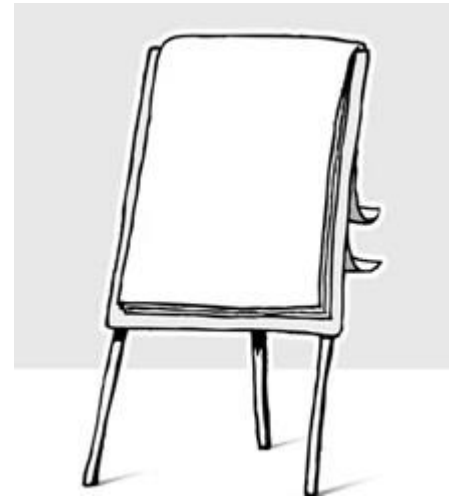
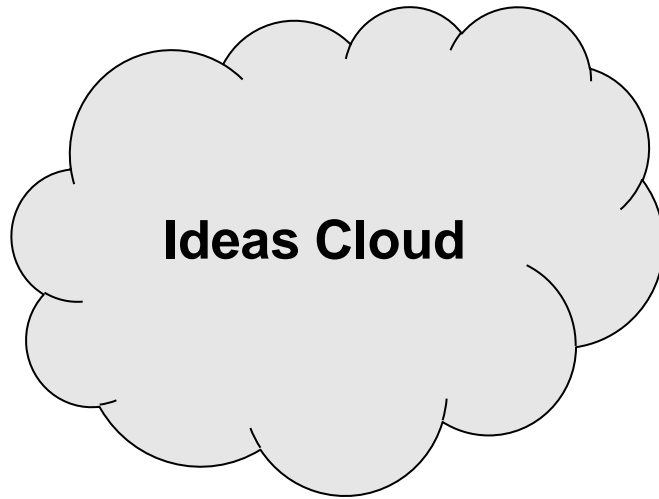


Slido poll

What are the risks of using an alternative approach?

- No guarantee that number will be lower
- How low is acceptable? (places may get a lower (but still unacceptable) number and be back in their current position)
- How long will it take to evidence and agree your approach?

Risk = time and resources lost



10-15 mins

what's the 'least worst' way of doing this?

If a Council wants to use an alternative method

Exceptional Circumstances (broadly)

- Must be relevant to Stage 1 (Need)
 - Unusually and specifically arising in the context of a particular area
 - Not generic criticisms of the Standard Method methodology
 - Circumstances that apply elsewhere are unlikely to be 'exceptional'.
-

Impact (3) – plan delay, meanwhile...

- Development ends up in the wrong places
- Planning by appeal
- Intervention (Plan Making and Decision Making)

Risk = community loses confidence
