

NORTH HERTFORDSHIRE DISTRICT COUNCIL

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Planning Policy Consultation Team
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Government

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By email

7 December 2018

Dear Sir / Madam,

Technical consultation on updates to national planning policy and guidance

Thank-you for the opportunity to comment on the proposed revisions to the National Planning Policy Framework (NPPF) and Planning Practice Guidance. North Hertfordshire District Council's (NHDC) comments are provided below.

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?

The Council would provide strongly qualified support; the most appropriate approach must consider the outputs of the standard method calculation as a whole.

In light of our own current evidence and Government policy, a formula that produces a plan-period average of approximately 700 homes per year for North Hertfordshire (however this is derived) would be a broadly reasonable balance between housing need, the capacity to deliver new homes and satisfying your ambition to boost housing supply beyond historic averages.

Reversion to the 2014-based projections would, without further adjustment, result in a requirement for the District close to this level. However, our requirement would be around 1,000 homes per year once the proposed adjustment and capping mechanisms in the standard method are applied. Identifying sufficient sites for, and sustaining average delivery rates at, this higher level over an entire plan period would be very difficult to deliver in practice in North Hertfordshire. This is before any unmet needs from surrounding authorities are taken into account. This position was previously set out in our consultation response on the revised NPPF

Even if the Council were able, in future plan-making terms, to identify sufficient land for these targets, delivery would remain reliant on the performance of third parties over whom we can only exert limited control. Failure to meet delivery targets rebounds onto the District in terms of the Housing Delivery Test and / or measurement of five-year land supply.

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?

NHDC is aware of the criticisms levelled at the 2016-based household projections and agrees that the change in methodology may perpetuate trends in household formation experienced over the decade between 2001 and 2011. This includes the recession, low levels of housebuilding, a decline in housing affordability and increasing numbers of adults living at home for longer.

As such, the Council agrees that applying the headship rates from the 2016-based household projections would be unlikely to accurately reflect upon future housing need.

However, the Council is not aware of such criticisms being levelled at the underlying 2016-based population projections. These remain the most up-to-date forward-looking population data issued by Government. NHDC consider it remains legitimate to explore the implications of the 2016-based population forecasts on housing need and / or the standard method in any future plans.

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

No. From our reading of the proposal, this approach could inflate the minimum annual local housing need (MALHN) in joint planning areas and / or result in the requirement in constituent authorities effectively going 'uncapped'.

See worked example in the table below:

- Authority A's demographic baseline of 10,000 homes is subject to a 50% uplift for affordability, so MALHN is capped at 40%;
- Authority B's demographic baseline of 5,000 homes is subject to a 20% uplift for affordability so MAHLN is not capped;
- Under the current approach, a joint plan would be the sum of the capped figures while any individual plan would not exceed these figures;
- Under the proposed approach, the sum of the adjusted figures would not exceed the 40% cap meaning Authority A's contribution to the requirement is effectively based upon an uncapped 50% uplift.

	Baseline	Adjustment	Capped
Authority A	10,000	+50% (15,000)	+40% (14,000)
Authority B	5,000	+20% (6,000)	+20% (6,000)
Authorities A + B	15,000	+40% (21,000)	+33% (20,000)
		Proposed approach	Current approach

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

Yes. Section 78 appeals should not be used as a quasi-plan making exercise to determine alternate housing requirements.

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

Yes. The proposal to bring non-major outline permissions into the list of sites deemed deliverable is supported.

Q6: Do you agree with the proposed amendment to paragraph 177 of the National Planning Policy Framework?

Yes. This approach seems reasonable.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D. Levett', with a long horizontal flourish extending to the right.

Councillor David Levett
Executive Member for Planning Enterprise and Transport