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](mailto:planningpolicyconsultation@communities.gov.uk)

Or posted to:

Planning Policy Consultation Team

Ministry of Housing, Communities and Local Government

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**By 7 December 2018**

**Your details**

|  |  |
| --- | --- |
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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.\*

**Other (please specify)**

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| The British Society for Population Studies (BSPS) is a non-profitable society of persons with a scientific interest in the study of human populations. |

If you selected other, please state the type of organisation

Please provide the name of the organisation (if applicable)

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| British Society for Population Studies (BSPS) |

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**

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| It should be the most recently available set of estimates and projections that are the starting point for assessing housing need. ONS act as an independent body to provide decision makers with the latest and best information on statistics that feed into population estimates and projections. Best practice has always been to use the most recent data, which not only reflects the detailed work by ONS to make improvements to methodology and quality but also gives planners a more accurate starting point. It is important that planning policy is based upon the most recent and therefore most accurate household projections available and the ONS 2016-based household projections incorporate a number of important adjustments not reflected in the 2014-based projections. If a policy-related adjustment needs to be made, it should be made to the standard method itself, not to the statistical inputs. There is no statistical justification for staying with the 2014-based projections and we would encourage MHCLG to adopt an approach that embraces the latest information. The UK Statistical Authority (UKSA) also advises the use of the latest information; under the General Principles on guidance for information and official statistics from the UKSA, the body governing ONS, the section labelled "Maximum value", 4.3 states..."When making important decisions, the best available data should be used." and current Planning Guidance (Paragraph: 009 Reference ID: 2a-009-20180913) states "The government’s official population and household projections are generally updated every 2 years to take account of the latest demographic trends" ; this proposal is ignoring its own advice. It will also contradict Paragraph: 012 Reference ID: 2a-012-20180913 which states that "The National Planning Policy Framework requires strategic policies to look ahead over a minimum 15 year period from adoption, although authorities are required to keep their policies under review. Reviews will ensure that plans are based on the most up-to-date evidence available for the plan period, including the latest assessments of housing need." i.e. the plan will immediately be out of date because it is not using the most up-to-date evidence available. |

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**

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| The results of the household projections are dependent upon the chosen household formation assumptions, as well as a range of decisions made in the production of the national and subnational population projections that form inputs to them. The draft guidance not to use the latest official projections to determine housing need, suggests a mismatch between what the projections represent and MHCLG requirements. We recommend that MHCLG works with ONS and other stakeholders to determine a specification for projections used to underpin subnational housing policy. Housing need should be assessed using the latest information, not least to take account of recent policy on housing and employment developments that will have had an impact on the components feeding into more recent Mid Year Estimates and therefore into the trends for more recent projections. If there is to be a change of policy, then MHCLG must allow Planning Authorities to anticipate its effects (which ONS are not allowed to do). Planning authorities need some certainty, but basing that certainty on old numbers will not be very helpful in local debates. The fact that the new projections have distributional effects is important, and should be incorporated into planning policy decisions as soon as possible. If it is adopted as an approach, then it should only be a stop-gap between the current situation and the time required to develop a new formula for the standard method. MHCLG should be mindful of recent changes to internal migration (London's growing net outflows) and international migration (changing dynamics due to the impact of Brexit), which while the latter would not yet be reflected in the trends for the 2016-based projections, are components that will need to remodelled to better reflect the current situation but with the 2016-based projections (and, ideally, ONS 2017 Mid Year Estimates) as the starting point. |

Applying the cap to spatial development strategies

**Question 3**

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

**Not sure**

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| There needs to be some regard for where a local authority embarks on a major new urban extension over the next decade after a slower building phase, then its household growth 'projection' must be adjusted to allow for this and maybe reduce the house-building targets of adjacent Local Authorities. There also needs to be a central body that monitors and maintains a database on the aggregate numbers - at the England level - of Households, Dwellings and Population resulting from Housing Requirement from Local and Strategic Plans. It is unsustainable and unrealistic to assume that every area can increase its population (and number of jobs) simultaneously (a product of increased housing requirement above the trend based ONS Sub-National Population Projections & CLG/ONS Sub-National Household Projections [it is assumed there is limited scope for increasing Household Representative Rates]). There must an overall limit which is bounded by the national population projections, produced by ONS, and can only be superseded if international migration increases above current projections (as all movements within the UK must sum to zero). |

Housing land supply

**Question 4**

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

**Please select an answer from this drop down menu**

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| Click here to enter text. |

The definition of deliverable

**Question 5**

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

**Please select an answer from this drop down menu**

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| 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?

**Please select an answer from this drop down menu**

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| Click here to enter text. |