

## **Department for Communities and Local Government: Technical consultation on updates to national planning policy and guidance**

### **Elmbridge Borough Council Draft Response:**

**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-

Elmbridge Borough Council (EBC) still considers that the standardised method is fundamentally flawed, over simplistic and relies upon a limited range of datasets, that by themselves, do not provide a complete assessment of housing need within an individual local authority area or across Housing Market Areas (HMAs). We would still like the Government to consider factors such as employment growth and other market signals such as land prices, rents, concealed households, and homelessness, as a more nuanced standard method would more accurately reflect actual housing need.

However, we recognise that the government is not consulting on the method as such, which was introduced to ensure local authorities and the communities they serve have a consistent starting point when understanding how many homes are needed in their local area. Instead, for the short-term, the government is specifying that the 2014 ONS based data will provide the demographic baseline for assessment of local housing need not the most recent ONS data.

EBC is one of the authorities that will be submitting a plan for examination after 25<sup>th</sup> January 2019. Therefore, we welcome the certainty and stability of a consistent ONS method. This enables us to be clear what the method requirement is, and we can then develop the appropriate evidence base and plan accordingly. It is important that this method is not changed on a regular basis to allow progress with local plans. By keeping the method consistent it also gives Councils, Elected Members and the public a clear and transparent direction.

**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-

In the case of Elmbridge, neither the 2014 or the 2016 ONS projections when used, reflect a level of housing provision that can be realistically achieved. We strongly believe that the method introduces 'a numbers game' and the use of 2014 or 2016 ONS projections is still a further step away from the very essence of a spatial planning system and the very nature of 'planning for the right homes in the right places'.

The Council is supportive of the governments intentions to tackle the housing problems. However it is difficult to explain to residents that the Government is proposing to amend the inputs into the previously agreed method, because the updated housing figures conflict with the Governments aspirations to build 300,00 new homes per year.

Therefore, EBC welcomes paragraph 15. of the consultation document in which the government acknowledges that the standard method is only designed to provide an appropriate starting point and is not a mandatory target. Paragraph 15. also sets out that local authorities may decide that exceptional circumstances justify the use of an alternative method but will need to identify justifications and should then expect them to be tested at examination.

EBC would urge the government to expand on this and give more details of what might be considered a 'sound' method and justification. As the government is pushing for local plans to be adopted, it would be to the benefit of all plan makers if the parameters were known prior to examination. This will avoid costly delays and the possibility of having to make amendments or being turned back at examination. Therefore, we feel it is imperative that the government clarifies what would constitute 'exceptional circumstances,' and sets out more details on what inspectors will be looking to test.

**Question 3: Do you agree with the proposed approach to applying the cap to spatial development strategies?**

This is not applicable to EBC.

**Question 4: Do you agree with the proposed clarifications to footnote 37 and the glossary definition of local housing need?**

Yes-

We have no objection to the clarification to footnote 37 and the glossary definition of local housing need, however the answers to Q1 & Q2 above set out our concerns with the standard method.

**Question 5: Do you agree with the proposed clarification to the glossary definition of deliverable?**

Yes-

The clarification of 'deliverable' is welcomed as this will hopefully reduce the need to debate the definition at appeals and examinations and should streamline the process.

However, we would welcome further opportunity for deliverability tests to consider local circumstances.

**Question 6: Do you agree with the proposed amendment to paragraph 177 of the National Planning Policy Framework?**

Yes-

The amendments are welcomed as they bring much needed clarity to the regulations. We will await further instructions on whether these arrangements apply once the UK has left the EU.