

Inspector's Questions 118

The Office of National Statistics published the latest (2016-based) Household Projections on 20 September. I need to have AVDC's view as to whether the new household projections represent a meaningful change in the housing situation and if that should have any bearing on the soundness of the plan.

AVDC Response

For clarity the latest Office of National Statistics (ONS) household projections use a later base date of 2016 than those used by the council in its Housing and Economic Development Needs Assessment (HEDNA), which are 2014 based. Also, the approach used by ONS to generate the projections differs from that used for the 2014 based figures in that the 2016 based figures project forward from a shorter base period which means the 2016 projections are more susceptible to short term variations. This has produced a radical reduction in household projections across the country, with overall growth per annum reducing from a projected 210,000 households per annum to 159,000 households per annum.

It also must be emphasized that these are projections based on continuing previous population growth rates, rather than forecasts based on a range of factors including market factors as is the case for the HEDNA. The calculation method is also based on the previous NPPF's requirements and its supporting guidance, not the new LHN requirement required under the new NPPF.

The following table drawn up by ORS illustrates the comparison of projected household growth for the period 2013 to 2033 between the new projections and the previous projections for Bucks councils and two adjacent councils to Aylesbury Vale.

Authority	2014 Based Household Projections	New 2016 based Household Projections	Difference
Aylesbury Vale	+21,027	+23,513	+2,486
Chiltern	+4,720	+3,943	-777
South Bucks	+6,035	+4,016	-2,019
Wycombe	+10,990	+6,350	-4,640
Bucks HMA	+42,772	+37,822	-4,950
Milton Keynes	+29,515	+24,069	-5,446
Central Beds	+35,676	+31,814	-3,862

As can be seen in the table there is a 2,486 increase in projected households for Aylesbury Vale over the 20 year period, but this is balanced by an overall drop of 7,436 households in the rest of the Bucks councils meaning that the overall change in Bucks is a reduction of 4,950 households across the county and the 'best fit' HMA. The housing requirement in the VALP either with or without the Inspector's proposed changes is therefore on the generous side when all things are considered and there is no pressing need to change it at this stage. Moreover, three adjacent councils to Aylesbury Vale are at examination with their local plans: Wycombe, Milton Keynes and Central Bedfordshire. All are using the same HEDNA evidence base for their plan coupled with an earlier review to accommodate future changes.

It is appreciated that the Inspectors are independent but the need for consistency is self-evident and we see no justification for not continuing to rely on the HEDNA evidence base for this plan, either with or without the Inspector's suggested modifications. In addition, the publication of the projections and their implications has come very late in the process for VALP and these other three plans with all four at the examination stage and three of them having completed their hearings. A change to the plan's base evidence will have significant implications at this stage for the speedy adoption of all these plans which is wholly unnecessary. The reasons for this are that consideration of potential implications for VALP must take into account the intention to commence a review of VALP once it is adopted. Even if the plan is modified to take account of the corridor in some way as set out in the Inspector's Interim Findings, there are a number of other factors which will mean the need to review VALP in any case. There is, for example, the impact of the new Local Housing Need (LHN) calculation method which will raise the housing requirement for VALP even before any adjustment for the new projections is made by the Government after its promised consultation. Then there are the significant adjustments to areas of Government policy in the new NPPF, such as in the area of affordable housing. Therefore, significant adjustments to VALP through a review are expected in any case and can be adequately accommodated through that process.

The Government's position on the need to expedite the delivery of local plans has been clearly set out in the letter from Greg Clark the then Secretary of State to Simon Ridley Chief Executive of the Planning Inspectorate in July 2015¹. In it the Secretary of State stated:

"As inevitably a plan cannot exactly account for future circumstances there is a real value in getting a Local Plan in place at the soonest opportunity, even if it has some shortcomings which are not critical to the whole plan."

He also noted that *"many inspectors have already demonstrated commendable pragmatism and flexibility at examination to enable councils to get plans in place"* and that *"it is critical that inspectors approach examination from the perspective of working pragmatically with councils towards achieving a sound Local Plan"*. The Secretary of State then stated that he would *"clarify how early review may be used as a way of ensuring that a Local Plan is not unnecessarily delayed by seeking to resolve matters which are not critical to the plan's soundness or legal compliance as a whole"* and asked the Chief Executive to *"update your procedural guidance and support to inspectors so that all Local Plan examinations take full account of this letter"*.

This approach is supported by the subsequently produced Government planning guidance on 'Publication and examination of a Local Plan' which states under 'What is the role of the examination' (Paragraph: 004 Reference ID: 12-004-20160519) that:

The Inspector should work proactively with the local planning authority. Underpinning this is the expectation that:

- *issues not critical to the plan's soundness or other legal requirements do not cause unnecessary delay to the examination of the plan, and*

¹ <https://www.gov.uk/government/publications/local-plans-letter-to-the-chief-executive-of-the-planning-inspectorate>

- *consideration should be given to the option of the local planning authority making a commitment to review the plan or particular policies in the plan within an agreed period, where this would enable the Inspector to conclude that the plan is sound and meets the other legal requirements.*

In the context of this Government statement, the extant Government guidance, the impending imposition of the new LHN method, which itself is likely to be amended, the lateness of the emergence of the projections in the examination process and the proposed early review of VALP it is contended that they do not give rise to any need to delay the preparation of the VALP to address their implications.

Given the Government advice and guidance set out above, it would not be pragmatic to delay the plan to take account of the potentially wide ramifications of the new projections when the proposed early review can take any updated projections into account and will in any event be on the basis of the new LHN calculation, which itself may well have been amended by that time.