

## Councils Response to Inspectors Initial Questions Friday 24<sup>th</sup> May 2019

### 8. Question 8

Planning Practice Guidance (Paragraph: 010 Reference ID: 2a-010-20190220) considers when it might be appropriate to plan for a higher housing need figure than the standard method indicates. It advises that “there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.

This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);
- strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;

There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests”.

**Have the Council carried out such an assessment and if so where can we find it?**

- 8.1. Assessment of Housing Need has been set out in PPC committee reports, initially in September 2017, as included in Q8 Appendix 1. In brief, this September 2017 PPC report sets out:

*Department for Communities and Local Government (DCLG) Housing Methodology consultation*

*4.3 The Government (in their recent Housing White Paper – HWP) proposes a new standard methodology for assessing housing need (based on recommendations from the Local Plan Expert Group - LPEG). This will be used to calculate housing need in the new Local Plan approach.*

*Extract - DCLG Planning Update Newsletter - 31 July 2017*

*Local housing need*

*In the Housing White Paper, the Government committed to consult on a new way for councils to assess their local housing need. Work is continuing on this to ensure the*

*new approach is simple, straightforward and transparent. We intend to publish the consultation when Parliament returns in September.*

*We recognise that a number of areas have already made significant steps in preparing their plan. In order to give you greater certainty we want to make it clear that if you submit your plan for examination on or before 31 March 2018 you will be able to progress with your plan, using the existing methodology for calculating local housing need, as set out in current guidance.*

*If a plan is withdrawn from examination or found unsound, depending on the outcome of the forthcoming consultation, you would prepare a new plan based on the new standardised method. We also intend to consult on what constitutes a reasonable justification for deviating from the standard methodology, and make this explicit in the National Planning Policy Framework.*

- 8.2. The use of the 'standard methodology' was confirmed in the March 2019 PPC Report

*3.3...In particular, the draft Plan is based on the NPPF (2018 and 2019) 'standard methodology' for assessing housing need*

- 8.3. None of the four circumstances described in the PPG (for "when it might be appropriate to plan for a higher housing need figure than the standard method indicates") or any other circumstances, apply in the situation of this District for this Local Plan. This was the case in September 2017 and remains the case now.

***growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);***

- 8.4. No such 'Housing Deal' or similar growth strategies exist for the area.

***strategic infrastructure improvements that are likely to drive an increase in the homes needed locally;***

- 8.5. No such strategic infrastructure improvements exist for the area.

***an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;***

- 8.6. No such agreement to take unmet need from neighbouring authorities exists for the area.

***where previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method.***

- 8.7. Previous levels of delivery are far lower than the 'standard method' – generally circa 360 homes per annum; and the SADC SHMA and the South West Herts SHMA show significantly lower levels of need than the 'standard method'