

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

Or posted to:

Planning Policy Consultation Team
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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.*

Local authority (including National Parks, Broads Authority, the Greater London Authority and London Boroughs)

If you selected other, please state the type of organisation

Click here to enter text.

Please provide the name of the organisation (if applicable)

Horsham District Council

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?

Please select an answer from this drop down menu

No. It is very disappointing to see the Government is not sticking to the rules that it itself gives to local authorities on local plan preparation viz. that authorities should provide "robust" and "up-to-date evidence" to support plan preparation. e.g. The Government's latest Planning Practice Guidance on "Housing and Economic land availability assessment" (Paragraph 030 Reference ID: 3-030-20180913, published 13 September 2018) states "In order to demonstrate 5 years' worth of deliverable housing sites, strategic policy-making authorities will need to provide robust, up-to-date (my emphasis) evidence to support plan preparation". Horsham District Council supports the Government position that more homes need to be provided, and that declining affordability is a serious issue that needs to be addressed. However, it should be done so on a national basis and on the most recent evidence available- that evidence is the 2016 Household projections from the Office for National Statistics, not those from 2014.

We note that the proposal to use the 2014 housing projections is a short-term measure and the long-term updating of a formula has yet to take place. That doesn't provide a great deal of certainty to plan making in the longer term and this issue should therefore be resolved sooner rather than later. Given that any mathematical formula will have outputs which can go up or down as the input variables change, there is a risk that any new formula could also run into similar problems. This could lead to continual formula variations and continued uncertainty in order to reach the 300,000 homes figure the Government seeks to achieve. Any solution therefore needs to avoid this particular problem arising.

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?

Please select an answer from this drop down menu

No, the 2016-based household projections are the latest available evidence and should be used. As set out in Question 1, that is the approach the Government advocates that local authorities use in preparing local plans, so why is the Government not following its own advice?

Applying the cap to spatial development strategies

Question 3

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

Please select an answer from this drop down menu

N/A

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

The proposed clarification to footnote 37 proposes adding reference to “local housing need” for assessing whether a five year supply of specific deliverable sites exists within an authority. This is only the case where an authority’s local plan is more than five years old, and therefore does not apply to Horsham District Council.

The other proposed amendment is to amend the definition of “local housing need” in the Revised NPPF Glossary from:

“the number of homes identified as being needed through the application of the standard method set out in national planning guidance, or a justified alternative approach” to

“The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 60 of this Framework)”.

Horsham District Council understands that this addition to the definition of “local housing need” is to clarify that local authorities should be using the “justified alternative approach” to the standard housing method during the preparation of strategic policies only, rather than local authorities using “justified alternative approaches” for applications and appeals. HDC supports this proposed amendment.

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

Yes. The proposed new definition of deliverable states (Yellow and underline represents proposed changed text):

“Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a

brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”

Under the current definition of “deliverable” in the Revised NPPF (July 2018), all sites with outline planning permission should only be considered “deliverable” where there is clear evidence that housing completions will begin on site within five years. Horsham District Council welcomes the proposed wording changes above that clarify that sites with outline permission for 1-9 units (i.e. non-major sites) are in principle considered to be deliverable. The proposed re-wording clarifies that it is sites with outline permission for 10 units + (major development) that should only be considered deliverable where there is clear evidence that housing completions will begin on site within 5 years. This is a welcome clarification from Government.

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

This proposed change is a result of a legal judgment that removed a common sense way of looking at risks to European nature conservation sites. This change therefore picks up the outcome of that finding and looks to be a sensible approach, given the circumstances we find ourselves in.