

Home Builders Federation

Matter 2

CENTRAL BEDFORDSHIRE LOCAL PLAN EXAMINATION

Matter 2 - Housing and Economic Needs

Q1. What is the difference in the objectively assessed need for housing in Central Bedfordshire when calculated using the 2018-based household projections, compared to the 2014-based projections?

This is for the Council to answer.

Q2. Have the figures for Central Bedfordshire in Examination Document EXAM 119 been arrived at correctly and on a robust basis? Are the key assumptions reasonable?

We broadly support the approach taken by the Council in its consideration of the 2018-based household projections. The assessment recognises the key limitation with regard to the principal projections and its use of only 2 years of migration trend data. Such a short period cannot be considered an appropriate basis over which to consider migration trend and more weight should be given to the projections using the 5- and 10-year migration trends that have also been provided by ONS. However, we do not share the consultants concerns that the previous estimates of migration used in both these estimates overstates the position. As is noted in EXAM119 levels of housing delivery would support higher levels of migration and as such we believe more weight can be given to the projections using both the 5-year and 10-year migration trend in the latest projections than is suggested by the Council.

Q3. Has there been a meaningful change in the housing situation in Central Bedfordshire for the purposes of the PPG – the objective assessment of housing need ('the OAN') and the housing requirement?

It is clear from the evidence presented in paragraph 7 of the EXAM119 that there has not been a meaningful change in the housing situation facing Central Bedfordshire as set out in the submitted Strategic Housing Market Assessment (SHMA) on the basis of the latest household projections. Both the 5-year and 10-year migration trend show minimal difference between the level of household growth over the plan period compared to those in the SHMA and indicate that no adjustment to the demographic starting point is required.



It is important when considering the latest data to remember that this plan is being examined under the transitional arrangements as set out in paragraph 214 of the 2019 NPPF. This transitional period was included in the NPPF to allow LPAs that had submitted plans, or were close to submission, to continue with their existing evidence base. The transitional period reflects the Government's desire for a plan led system and the drive to ensure all LPAs had local plans. A key part of this was to allow those Councils caught by the changes to the NPPF to rely on their existing evidence as preparing new evidence would inevitably slow the process for such authorities. What the transitional period was not meant to lead to was a continued updating of the evidence of supporting local plans submitted prior to January 2019. It was meant to do the exact opposite – to ensure plans could come forward and be examined on the evidence as submitted. In particular it should not see submitted plans being amended were this would be inconsistent with the Government's restated ambition to boost housing supply in order to deliver a minimum of 300,000 homes per year¹.

Indeed the continued reliance on the submitted evidence for transitional plans is supported in the November 2018 letter to Chief Planning Officers which states in its update on the use of the 2016-based household projections in the standard method that plans submitted on or before the 24 January 2019 can be based on existing assessments of housing need at the time of submission. This would suggest that the Government were not endorsing the use of the later household projections within transitional plans in the same way that they did not endorse their use in the current standard method.

The Council has, as required by PPG, considered the latest data, and concluded no change is required. But even if there had been a significant change in the latest data it would be both justified and consistent with national policy for a plan in transition between the two frameworks to continue with the housing requirement in the submitted local plan on the basis of the evidence submitted with that plan.

Q4, Q5 and Q6 – Luton's housing needs

The consideration of Luton's OAN under this methodology using the 2018-based household projections is a moot point as should Luton prepare a new plan it would be required to on the basis of the policy in place at that point and not that set out in the 2012 NPPF and its associated guidance. As such no weight should be attached to assessment of Luton's housing needs as set out in note 2 of EXAM119. The only sound basis against which to consider Luton's unmet needs is against the adopted plan.

It is also not for this examination to consider whether there has been a meaningful change in Luton's housing needs. This can only be done through the review and examination of the Luton Local Plan. Even if this examination could consider Luton's future development needs in this manner it would have to draw its conclusion on the basis of current planning policy and not the 2012 NPPF. If the Luton Local Plan were

¹Paragraph 6 'Changes to the current planning system' (MHCLG, 2020)
<https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>

being examined under current policy the starting point for setting their housing requirement would be the local housing needs assessment using the standard method as set out in paragraph 60 of the 2019 NPPF and its associated guidance. This results in a minimum annual requirement for Luton of 1,376 dpa, substantially higher than the current OAN.

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