

LICHFIELDS



How do you link jobs and housing to ensure greater sustainability?

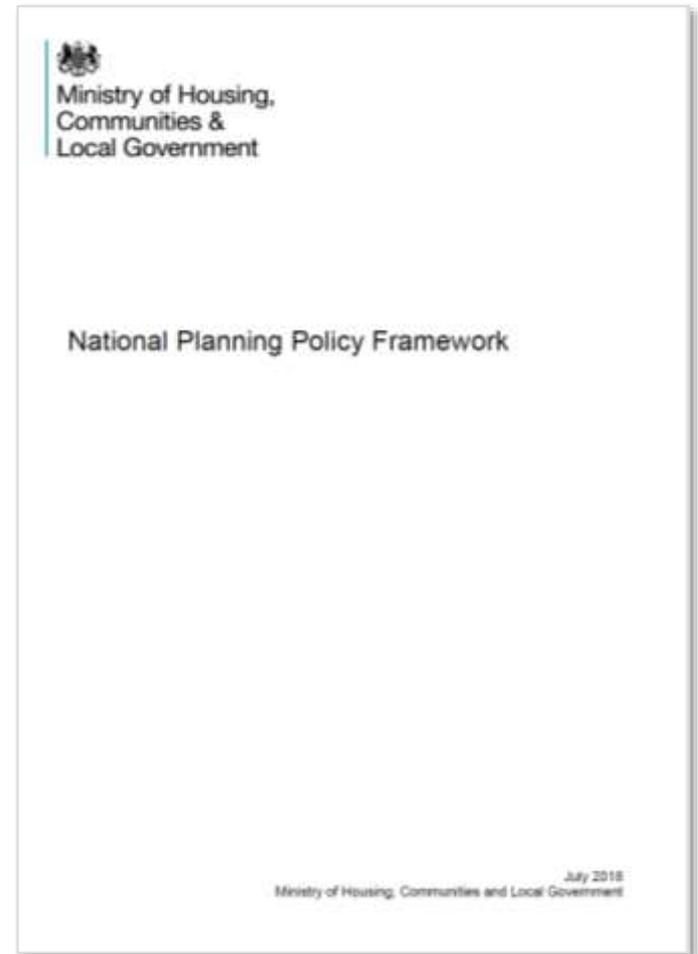
A review of plan making under NPPF 2.0

Matthew Spry, Senior Director

10th October 2019

Agenda

- Progress with plan making
- Delivering on housing needs?
- Aligning jobs and homes
- Conclusions



Progress with plan making

Suspended animation: NPPF 2012



- 34 Local Plans submitted since NPPF
- 20 of these to be assessed against old NPPF

Plans for the needs of older people?

INSIGHT
APR 2019

Solutions to an age old problem

Planning for an ageing population



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Key figures

60%

of Development Plans in England, Scotland and Wales⁴ have generic policies relating to a requirement for housing for older people

14%

of Development Plans in England, Scotland and Wales have specific policies relating to a requirement for housing for older people

7%

of Development Plans in England, Scotland and Wales include land allocations for housing for older people

81%

of Scottish authorities monitor delivery of homes for older people compared with 16% in England and Wales

5.2m

the number of additional people aged over 65 by 2036 (from 2016) in Great Britain

17m

the number of people aged over 65 in Great Britain by 2036

24%

of the population will be aged over 65 in Great Britain by 2036

⁴ Post NPPF adopted plans in England, all adopted Local Development Plans (LDPs) in Wales and Scotland

NPPF Changes to plan making

More difficult?

- Minimum 15 year time horizon
- Tighter definition of deliverable for 5YHLS
- *“Maximum clarity about design expectations”*
 - Building Better Building Beautiful Commission
- ‘Upstreaming’ the viability debate
- Small sites
- Housing mix
- Green Belt

Easier?

- More certainty over housing need
- “An appropriate strategy” rather than “the most appropriate”
- More codified rules on 5YHLS

Still challenging

- Strategic planning/duty to cooperate
- Large-scale sites

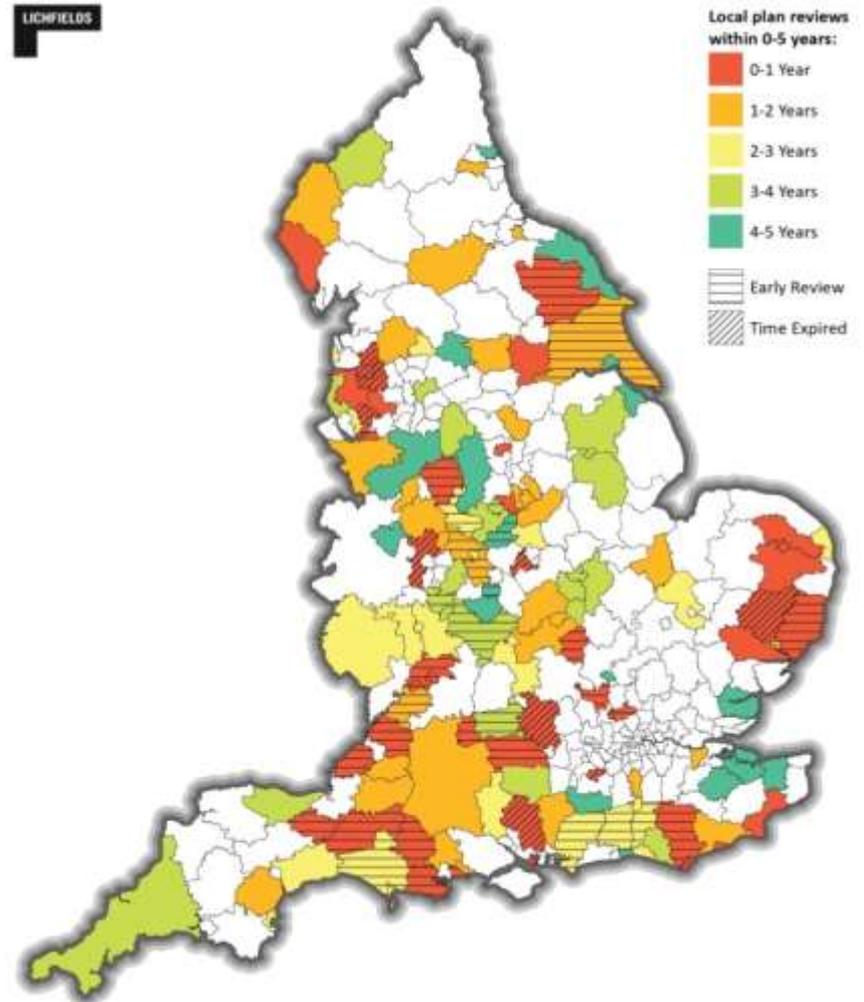
New NPPF Plans

LPA	Published	Submitted	Status
Hearing Sessions Complete			
Suffolk Coastal District Council	14-Jan-19	29-Mar-19	Hearing sessions concluded on 20th Sep
Hearing Sessions Underway			
Rossendale Borough Council	23-Aug-18	25-Mar-19	Hearing sessions underway
Sevenoaks District Council	18-Dec-18	30-Apr-19	Hearing sessions underway
Purbeck District Council	22-Oct-18	28-Jan-19	Hearing sessions underway
Northumberland	30-Jan-19	29-May-19	Hearing sessions underway
Hearing Sessions due to commence imminently			
Chesterfield	14-Jan-19	28-Jun-19	Hearing sessions to commence 15th October
Durham	25-Jan-19	28-Jun-19	Hearing sessions to commence 22nd October
Hearing Sessions due/likely to commence next year			
St Albans Council	04-Sep-18	29-Mar-19	Hearing sessions provisionally set for Jan/Feb 2020
Oxford City Council (2016-36 review)	01-Nov-18	22-Mar-19	Council still responding to Initial Questions, no date for Hearing Sessions
South Oxfordshire District Council	07-Jan-19	29-Mar-19	Council currently set to withdraw plan
Suspended			
Basildon District Council	01-Nov-18	28-Mar-19	Suspended in June 2019 before hearing sessions commenced due to request from Minister of Environment related to air quality

Excluding National Park / Devt Corporation

- Submissions running at a plan a month
- 17 'Strategic' policy plans anticipated over next 6 months

Plan Reviews – up to date?



Plan reviews – the loophole?

- Given post-NPPF 2012 plan coverage, NPPF 2.0 will predominantly be implemented through updates/replacement of plans
- Requirement to review plans every five years and update where necessary.... but who decides? LPA is judge in its own cause

Surrey council decides there is no need for five-year update to core strategy

28 July 2019 by Mark Wising

A local plan review by Reigate and Banstead Borough Council has concluded that "none of the policies in the core strategy requires updating or modification", despite an inspector advising that matters including housing requirements may need to be reassessed.



15. It is argued that the DMP should maximise the opportunities for housing delivery including through the Sustainable Urban Extensions (SUEs), seeking to minimise the unmet housing need in the plan period. The Council has commenced a review of the CS, which would take the form of a new Local Plan, reviewing the site allocations and development management policies. It is through this review that the housing requirements of the borough should be reassessed.

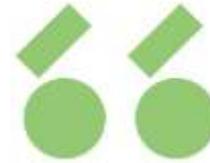
DMP Inspector's Report, 9th July 2019

Reviewing a plan means undertaking an assessment to determine whether the policies need updating. There is no prescribed format for a review, however, the process for undertaking a review is set out in legislation and national policy and there is some guidance within the Planning Practice Guidance.

In line with the statutory obligations, a thorough review of each individual policy within the Reigate and Banstead Local Plan: Core Strategy has been undertaken, following the legislation, national policy and PPG. This review concludes that each of the policies is in broad conformity with the provisions of the 2019 NPPF and all other relevant national policies. It also identifies that the latest evidence and monitoring data demonstrates that the policies of the Core Strategy are operating effectively and delivering positively against the requirements, objective and indicators in the plan. Consequently, it concludes that none of the policies in the Core Strategy requires updating or modification at this present time.

Reigate and Banstead Core Strategy Review, 2nd July 2019

Pragmatism creating moral hazard?



On the substance of plan examinations, I wanted to stress to inspectors – who are doing a challenging job – the importance of being pragmatic in getting plans in place that, in line with paragraph 35 of the NPPF, represent a sound plan for the authority and consistent in how they deal with different authorities.

Secretary of State's 18 July Letter

Intervention: a dog that didn't bark

- 15 local authorities without post-2004 plans identified in November 2017
- Wirral, Thanet, Castle Point identified for potential intervention in March 2018
- Most now submitted plans for examination
- But Wirral and Castle Point outstanding

I have noted above that Wirral is not an area of higher housing pressure, and therefore this criterion for prioritising intervention is not met. However, notwithstanding this, I consider that it would be appropriate to intervene because Wirral Council's performance in respect of the other criteria is lamentable. For example Wirral's last Local Plan was adopted in February 2000, covering a period up to March 2001, with the authority reliant on saved policies from the 2000 Local Plan to determine local planning applications. In comparison with other authorities written to by the former Secretary of State in November 2017, Wirral have made the least progress. Of those authorities still to submit their Local Plan for examination, Wirral are timetabled to submit significantly later than the other authorities.

Having considered Wirral's performance against the intervention policy criteria, I am satisfied that intervention action is justified.

Having considered all of the above, in my judgement, there is a compelling case for the Local Plan intervention action I have decided upon in Wirral, pursuant to powers in section 27(2)(b) of the 2004 Act. In my judgement, there is also compelling case to intervene to prepare the Wirral Local Plan pursuant to the powers in section 27(2)(a) of the 2004 Act. However, in recognition that the publication of the revised National Planning Policy Framework and related planning reforms will inform the preparation of your Local Plan, I have decided not to prepare the Wirral Local Plan at this time. I am offering you a final opportunity to demonstrate a clear path towards the delivery of your Local Plan. I will continue to closely monitor your Local Plan progress. Should a significant delay occur against the milestones set out in your March 2018 Local Development Scheme, should you fail to comply with the directions in this letter without a good reason or should your draft Local Plan fail at examination I am minded to take over the preparation of the Wirral Local Plan.

Strategic Plans – solution or delay?

PLANNING

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Fresh delay to Greater Manchester Spatial Framework announced

24 September 2019 by Ben Cooper

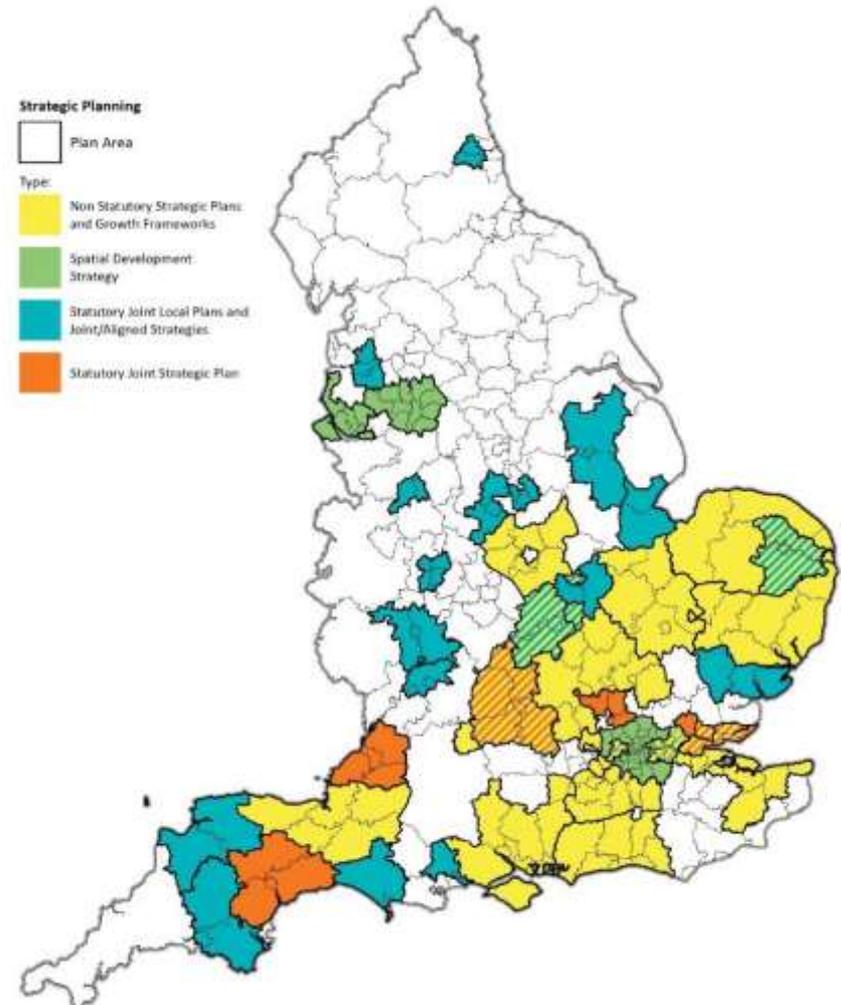
The Greater Manchester Combined Authority (GMCA) has announced a fresh delay in the production of a new spatial framework for the city region, with consultation on a final draft of the document pushed back by about a year.



Greater Manchester (pic: Stephen Burton, Geograph)

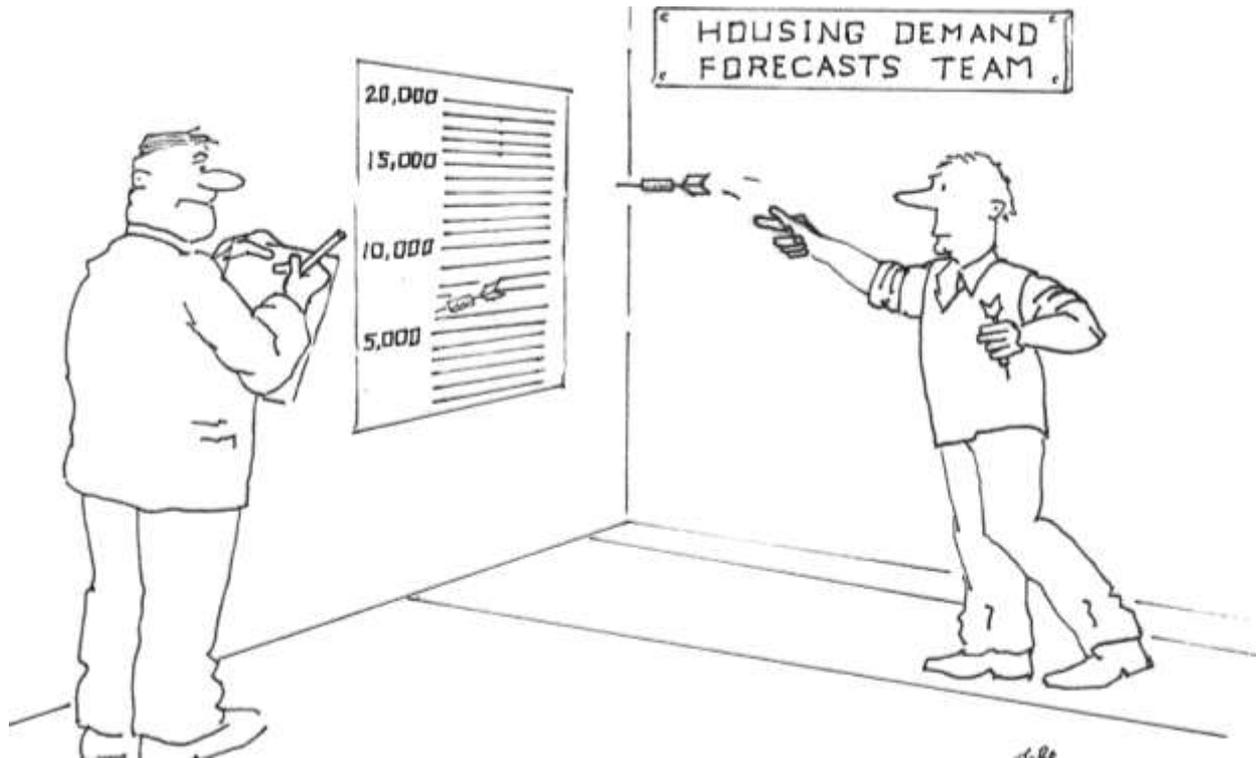
The draft Greater Manchester Spatial Framework (GMSF), published for consultation in January this year, set out proposals for, among other things, a minimum of 201,000 new homes in the metropolitan area and the release of green belt land to enable this target to be met.

A timetable in the January draft said the final draft of the plan intended to be produced for consultation in the summer of 2019 and then submitted for examination in early 2020, with adoption earmarked for late 2020 or early 2021.



Delivering on housing needs?

Goodbye to OAN



- Adopted post-NPPF plans provide for 164K homes per annum
- Plan-led approach to just 54% of Govt ambition or c.70-75% of completions

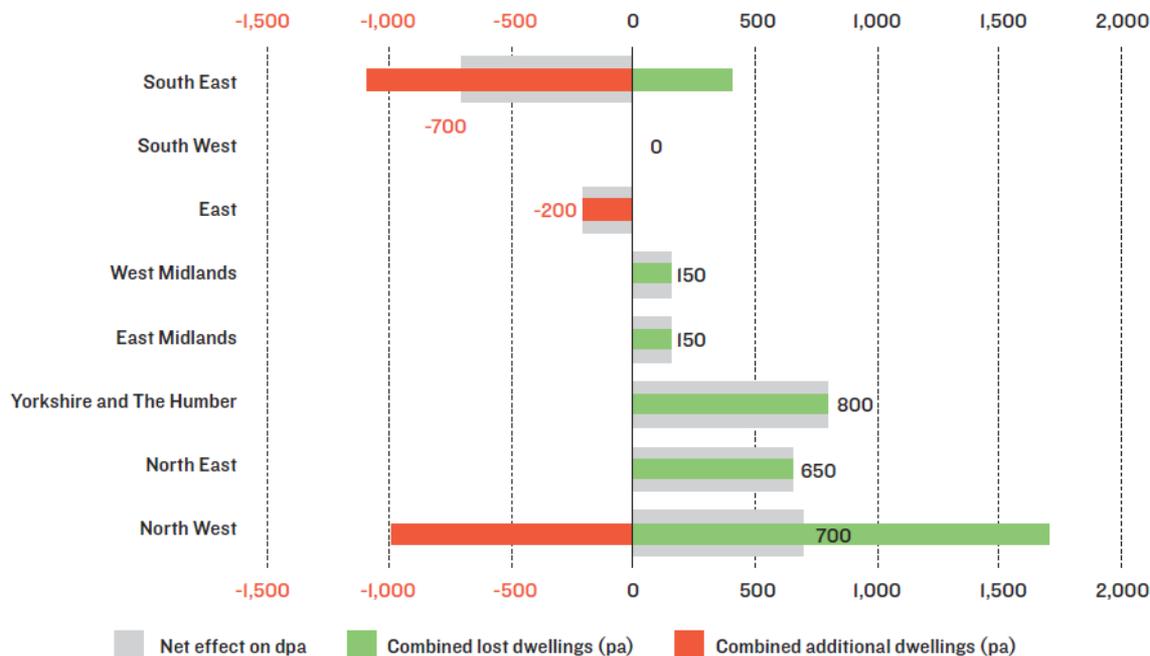
Hello to the Standard Method

- Cuts the debate
- 273K dpa
- But in some places also cuts the numbers
- ONS Methodology changes = credibility undermined
- Needs national uplift of 10% to get to 300K
- Clarity over upward adjustments?
- New method anticipated Summer 2020
- Hiatus on plan making?



How are plans responding?

- Review of 64 Plans under preparation (or submitted) with stated housing requirements against the Standard Method
- Aggregate boost above the minimum starting point is 4%
- Only two LPA challenging the SM itself; most citing constraints/redistribution



Source: Lichfields analysis

*Note: Figures for the North West include the IO Greater Manchester authorities where the standard method has been redistributed across the city.

The London delivery conundrum

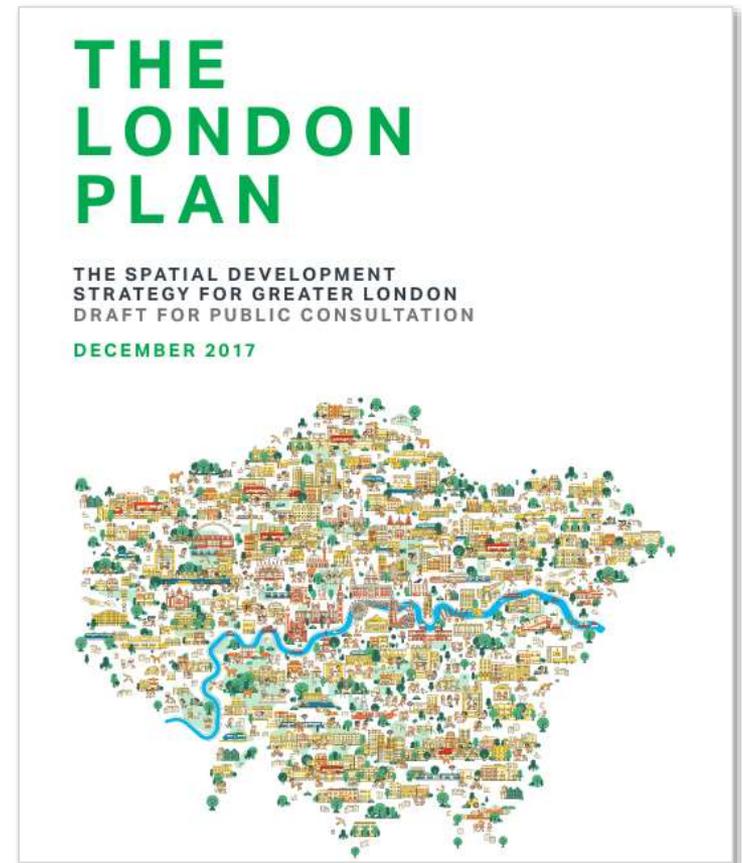
Evening Standard.

Sadiq Khan's 65,000 homes-a-year plan criticised as 'undeliverable'

ROSS LYDALL City Hall editor | Friday 27 September 2019 13:25 | 13 comments



Big issue: Mayor Sadiq Khan is under pressure to build more new homes in London (Alex Lentini)



(Heroic) extrapolation shows <300K



Aligning jobs and homes

Challenges on jobs and housing

- Ensuring economic growth is not undermined by shortage of housing
- Labour supply vs scale of employment
- Sustaining crucial services (including in health and care) in growth areas
- Providing right type of accommodation
 - Affordable
 - Entry-level owner occupation
- Aligning with Growth deals and infrastructure investment



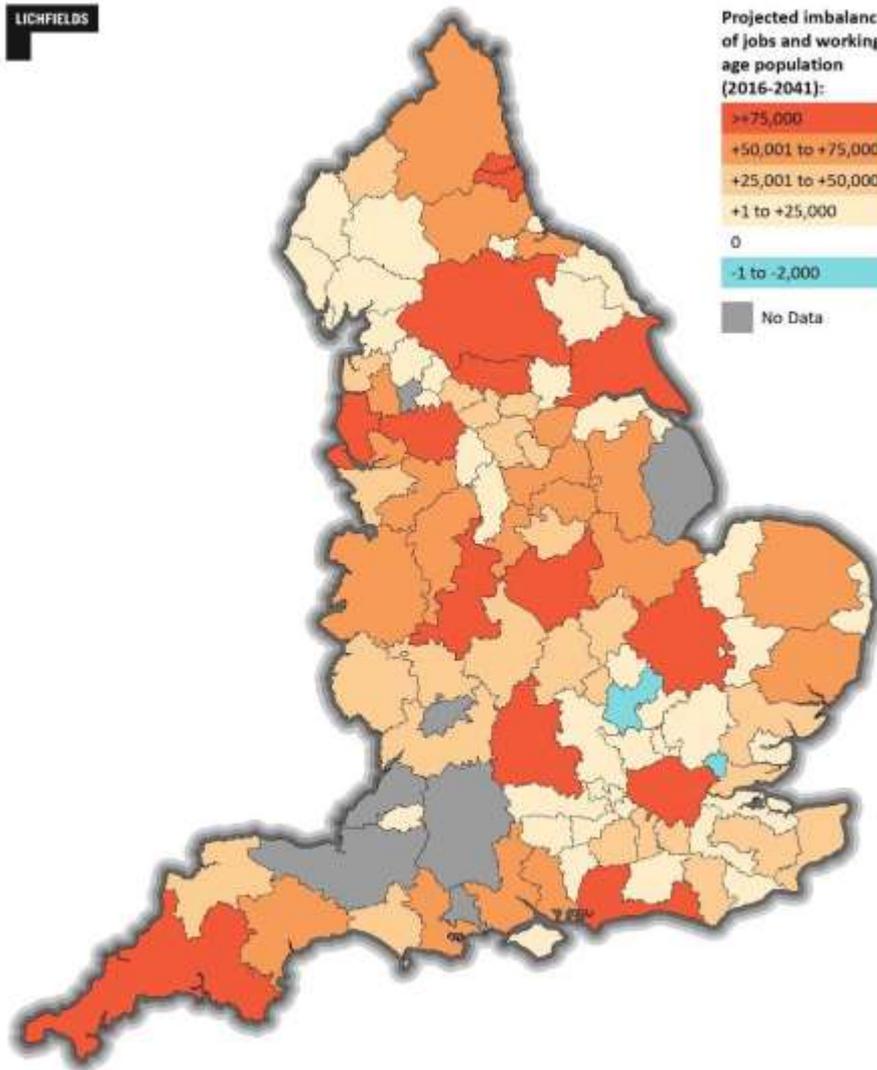
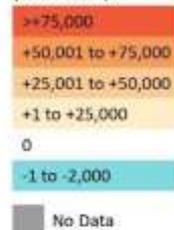
Planning policies should... seek to address potential barriers to investment, such as inadequate infrastructure, services or housing

NPPF Para 81

Potential labour market shortfalls

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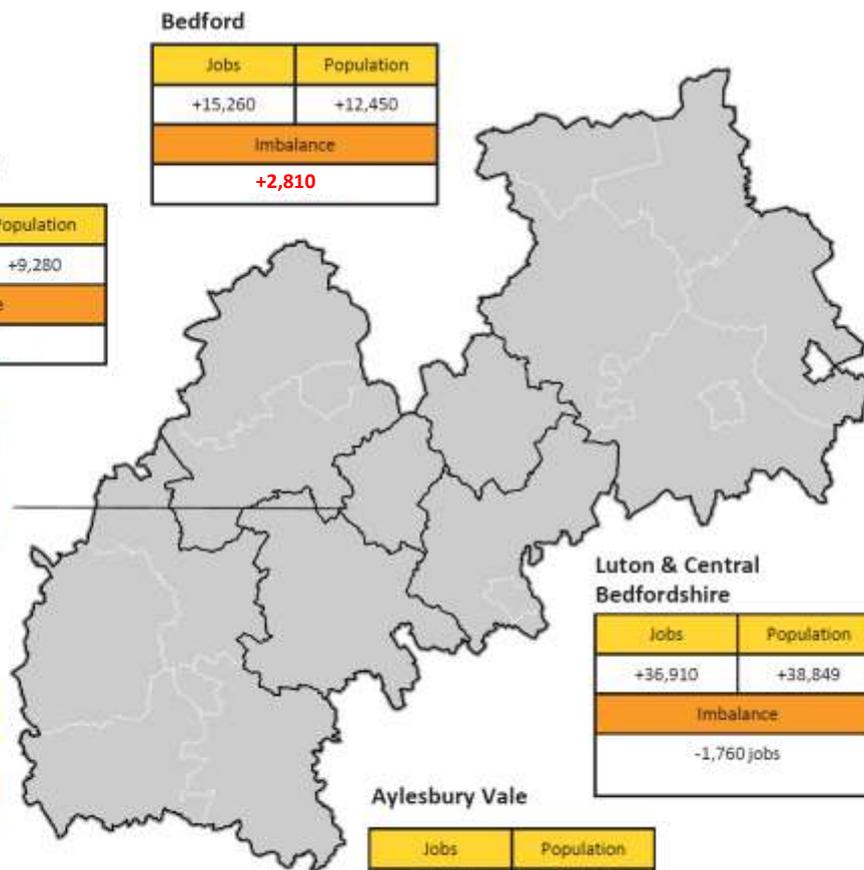
Projected imbalance
of jobs and working
age population
(2016-2041):



Note: Figures refer to projected population growth in LA/HMA over the 25 years from 2016 to 2041, rounded to nearest ten; jobs growth is projected forwards from 2001-2011 based on working population growth.

Source: ONS, Lichfields Analysis

Undermining potential of CaMKOx?



Northampton
(West Northants)

Jobs	Population
+52,220	+9,280
Imbalance	
+42,940	

Bedford

Jobs	Population
+15,260	+12,450
Imbalance	
+2,810	

Cambridge
(Cambridgeshire)

Jobs	Population
+116,920	-3,158
Imbalance	
+119,920	

Milton Keynes

Jobs	Population
+49,160	+15,310
Imbalance	
+33,850	

Oxford
(Oxfordshire)

Jobs	Population
+91,870	-3,158
Imbalance	
+95,028	

Luton & Central Bedfordshire

Jobs	Population
+36,910	+38,849
Imbalance	
-1,760 jobs	

Aylesbury Vale

Jobs	Population
+15,830	+18,160
Imbalance	
-2,330 jobs	

Projected job growth 2016-41 (2001-2011 trend-based)	Projected working age population growth 2016-41 (SNPP, 16-64)
Net imbalance between projected job growth and working age population living within the HMA	

Note: Figures refer to projected population growth in LA/HMA over the 25 years from 2016 to 2041, rounded to nearest ten, jobs growth is projected forwards from 2001-2011 based on working population growth.

Where were we with policy?

- NPPF 2012
- Employment growth was at least to some extent, part of the approach to assessing housing need
- What that growth was in practice dominated by opaque, circular and arguably discredited models
- Some difficulties around concept of “policy off” (OAN) and “policy on” requirement
- But legal judgments (e.g. Hunston, Solihull) helped to clarify some important issues

Where are we with policy?

- NPPF Para 11: Plans should, as a minimum, meet OAN
- NPPF Para 60 = minimum number of homes needed is informed by LHN assessment, conducted using standard method
- NPPF Glossary: LHN = standard method set out in PPG, or a justified alternative approach
- PPG gives us standard method, but also identifies that if uplift is capped (40%) the actual need is higher
- PPG also tells us there will be circumstances where one can consider whether actual need is higher
 - Growth strategies for the area are likely to be deliverable
 - Strategic infrastructure improvements will drive increase in need
 - Previous SHMAs showing higher figure
- PPG says any figure higher than standard method derived should be considered sound as it will have exceeded the minimum starting point.
 - What does that mean for areas that go higher, but not high enough?
- To be sound, a plan must be consistent with NPPF; what if housing need in standard method doesn't match paras 80 and 81 on economic growth?
- What actually is housing need? And how does it relate to the presumption in favour and a sound plan?

Growth Deals and Initiatives

- Return of regional planning?
- Carrots (but is there stick?)
- How to evidence?
- How to agree?
- How to reverse into Local Plans?
- Local conversations



PARTNERING FOR PROSPERITY:

A new deal for the Cambridge-Milton Keynes-Oxford Arc



NATIONAL
INFRASTRUCTURE
COMMISSION

12,250 homes delivered per year 2012-15

14,330 homes delivered in 2016-17

15,926 homes provided for in local plans

23,000 homes to meet local needs in full

30,000 homes to meet local needs & pressures from land constrained markets

Conclusions

Reflections on a year of the NPPF2

- Only now seeing plans submitted since January 2019 being tested
 - What will happen to these 'early adopters' at EIP?
- Delays to strategic planning and the review loophole are barriers to NPPF policies being implemented
- Limited signs of downward pressure on the standard method, but not enough LPAs are exceeding it to match Govt ambitions for 300K
- New methodology in Summer 2020 may mean hiatus in plan making
- Lack of clarity on how to plan for housing implications of local economic growth



More information...

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