

APPENDIX F: Examinations in Public which have been stalled or suspended on the 'Objectively Assessed Need', 'Boost' and general Strategic Housing Market Assessment Issues

Rother

CS Status: Authority is proposing to increase its housing target to be in line with RSS figures.

PINS: PINS interim conclusions refers back to the South East RSS numbers, and state that the LPA housing evidence seems based upon policy and land supply considerations rather than objectively assessed need.

Inspector also states that the economic downturn is not a reason to lower housing figures over a 20 year time period, and references NPPF re. boosting significantly housing supply.

Proposed Modifications include a commitment to an early review of the Core Strategy.

Lessons: In areas where they are still extant, RSS figures are still the benchmark. Objectively assessed needs should be identified separately to supply considerations.

The economic downturn is not a reason to lower housing figures over a 20 year time period.

An option for authorities not looking to meet their "objectively assessed needs" is to commit to an early review of the Core Strategy.

Boosting significantly the supply of housing is a relevant consideration.

Salford

CS Status: Evidence for District Housing Requirement based on SHMA (discounted RSS figures)

PINS: SHMA recommended between 1350-1411dpa. Inspector concluded that LPA should be aiming for 1,600dpa (RSS figure) rather than the proposed 1,300dpa.

Core Strategy withdrawn due to this, and also due to the associated lack of identification of sufficient housing and employment land supply.

Lessons: In areas where they are still extant, RSS figures are still the benchmark.

Suffolk Coastal

CS Status: Council is now consulting on proposals for Main Modifications to the Core Strategy including revised housing target.

PINS: Objectively assessed need figure initially identified was below RSS and below from EEFM modelling outputs; this figure was identified using a "policy judgement" relating to environmental constraints. Inspector stated that such matters were not relevant to identifying objectively assessed needs.

Inspector is seemingly allowing a revised housing target (higher than proposed initially, but still around 1,000 lower than RSS levels), on the basis that Suffolk Coastal commit to an early review (I&O publication in 2015), a review that also relates to an identified land supply shortfall in relation to the selected housing target.

Lessons: Objectively assessed needs should be identified separately to supply considerations.

An option for authorities not looking to meet their "objectively assessed needs" is to commit to an early review of the Core Strategy.

East Hampshire

CS Status: Considering suspending its examination

PINS: Inspector questions lack of up-to-date SHMA to support housing number (despite the proposed number conforming to the RSS requirement).

Also stated that needs should be identified, even if environmental designations prevent this need being met.

Noted that no duty to cooperate discussions had taken place regarding meeting unmet need.

East Hants did have an NLP produced 2011 Local Housing Requirements study, and a 2012 Housing Needs Assessment Update.

East Hants proposed to undershoot the housing figures in their Housing Requirements Study.

Lessons: An up-to-date SHMA is required.

Objectively assessed needs should be identified separately to supply considerations.

If need will go unmet due to land constraints, NPPF requires that needs be assessed and communication take place with neighbours to discuss meeting unmet need.

High but deliverable affordable housing need can influence an increased housing target.

Rushcliffe

CS Status: Considering suspending its examination after Inspector questions main housing requirement, due to its not proposing to meet the East Midlands RSS number.

Following an exploratory meeting to discuss the Inspector's initial concerns, principally regarding their housing total, the Inspector is recommending a withdrawal of the Core Strategy, or at least a 6 month suspension of the Examination.

PINS: Inspector cites ONS SNPP projections, and the fact that the Council does not propose to meet these figures; all adjoining councils criticised Rushcliffe's housing policy during consultation.

Inspector noted that since the authorities in the HMA can't agree what the overall HMA housing demand figure should be, it makes it very difficult to identify that number.

Inspector references NPPF "boosting significantly the supply of housing" as a relevant factor.

Notes that adjoining districts were all openly critical of the Plan's housing policy.

Recommends that if the problem is focused on the distribution, not the amount, of housing demand, the HMA authorities should discuss this, outside of the Examination.

Lessons: National population and household projections should be seen as the starting point for assessing housing demand.

In areas where they are still extant, RSS figures are still the benchmark.

SHMA should identify a total housing figure for the HMA.

If an authority disagrees with the spatial distribution of housing figures across district boundaries, this should be resolved prior to Examination through meetings with HMA authorities.

Boosting significantly the supply of housing is a relevant consideration.

Ryedale

CS Status: Submitted to PINS. Inspector's draft interim conclusions released.

PINS: Proposing to undershoot ONS SNPP projections, and didn't test the sustainability of higher levels of housing provision.

Inspector noted that it didn't show an objective identification of housing demand.

When shown evidence as to why environmental constraints meant that the housing requirement should not be increased, agreed to a proposed 25% "local buffer" approach allowing flexibility over the headline minimum housing target.

Inspector required commitment to review the Plan within the next 5 years.

Lessons: National population and household projections should be seen as the starting point for assessing housing demand.

Objectively assessed needs should be identified separately to supply considerations.

An option for authorities not looking to meet their "objectively assessed needs" is to commit to an early review of the Core Strategy.

Dacorum

CS Status: Council has agreed to Inspector's suggestion that they commit to an early review of their Core Strategy.

PINS: Inspector suggests that Dacorum's selected housing target is based upon environmental constraints, not demand.

Cites CLG housing projections in his discussion of objectively assessed need.

Emphasises that housing demand assessment should take place first and separately from supply assessments.

Suggests that Dacorum & St Albans should have communicated about St Albans meeting Dacorum's unmet demand.

Lessons: Objectively assessed needs should be identified separately to supply considerations.

National population and household projections should be seen as the starting point for assessing housing demand.

If need will go unmet due to land constraints, NPPF requires that needs be assessed and communication take place with neighbours to discuss meeting unmet need.

Hull

CS Status: Withdrawn Dec 2012.

PINS: Inspector initially stated that it was very difficult to understand what the derivation of the selected housing target was.

In proposed modifications, Hull proposed to lower their housing target based on Census 2011 results.

In arriving at these figures they contradicted evidence from the 2009 SHMA regarding predicted migration change.

Inspector questions legitimacy of "selective" housing numbers report, and also questions legitimacy of "outdated" SHMA 2009 Update.

In recommending the withdrawal of the CS, the Inspector stated that updating Housing Market Assessment would be essential.

Lessons: An up-to-date SHMA is required.

Methodologies for arriving at housing numbers should be transparent.

Housing target requirement papers should consider all relevant forecasts, rather than being "selective".

Bath & North East Somerset

CS Status: Core Strategy Examination suspended Sept 2012. Examination Hearings intended to be resumed in July 2013.

PINS: Inspector noted that:

SHMA did not identify an overall housing demand figure for the HMA;

The district's housing requirement was established at district rather than HMA level;

Housing figure based upon linear and inflexible multiplier between jobs and homes, and did not consider population or household projections; and

Affordable housing needs would not be addressed by housing target.

Lessons: An up-to-date SHMA is required.

Objectively assessed needs should be identified separately to supply considerations.

Aligning housing targets solely to jobs growth is too narrow- a rounded assessment is needed.

Methodologies for arriving at housing numbers should be transparent.

With regard to economic growth, it is impossible to say that one projection is right and others wrong; there is too much uncertainty.

In assessing soundness, the degree of alignment with the economic strategy of the Local Enterprise Partnership and flexibility to respond to changing economic circumstances are both important matters

Coventry

CS Status: CS thrown out.

PINS: Have not met the legal requirements of the 2004 Act in that Council has not engaged constructively with neighbouring local planning

authorities on the strategic matter of the number of houses proposed in the Plan.

There is a lack of broad consistency in the way housing need is being calculated between the various LPAs in the Coventry housing market area

This calls into question whether they are all capable of meeting their housing requirements within their borders, consequently there is no requirement for any local authority to meet any part of its housing requirements in another area.

It has not collaborated with its neighbours to produce a joint SHMA for the housing market area even though paragraph 159 of the Framework says it should

The evidence does not show that cooperation between Coventry and its neighbouring councils has been constructive, as required by the 2004 Act, or effective as is expected by paragraph 181 of the Framework.

Lessons: There needs to be a single, consistent method for calculating housing need in the HMA.

There is a need for a joint, up-to date SHMA.

This is vital if full duty to co-operate is to be demonstrated.

Hertsmere

CS Status: Now adopted (in Jan 2013), having made modifications as recommended by the Inspector after initial submission in 2012(headline points outlined below).

PINS: The proposed housing targets had not been adequately justified against RSS.

The evidence available for Hertsmere does not amount to Objectively Assessed Need, as required by the NPPF.

Fully addressing the Framework will require significant additional evidence gathering, collaboration and positive planning with other authorities, including consideration of any need to review the boundaries of the Metropolitan Green Belt (Green Belt)

Required that the Plan's housing target to be a minimum figure and for the Council to delete the proposed phasing approach, which was considered to unnecessarily constrain delivery

The Council should review the CS early, so as to address the points to do with objectively assessed need and evidence base.

Lessons: Where an RSS is not revoked, it (and its evidence base) should not be brushed aside.

It is vital that the full Objectively Assessed Need is shown.

An updated SHMA is needed.

Key Conclusions

The need for an up-to-date evidence base, in particular an up-to-date SHMA is evident almost across the board. This is vital for understanding the full Objectively Assessed Need, as outlined in the NPPF.

The Duty to Cooperate is another reoccurring issue, and relates to the above point about the spread of housing required across various Districts in the Housing Market Area. Again, this is reliant on sound evidence.

Objectively Assessed Needs should be identified separately to supply considerations.

In the earlier EiPs that were taking place in the immediate wake of the publishing of the NPPF, Inspectors seem to have allowed for Plans and Core Strategies to continue on the basis that they can be reviewed early. This is unlikely to be a luxury afforded to any Plans coming forward in 2013/14, as it will be almost 2 years since the NPPF was published. Indeed, Coventry is a good example of this lack of leniency.