

Calderdale Local Plan examination

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Note to Calderdale Council – 10th July 2020

Office for National Statistics: 2018-based household projections

- 1.1 The submitted Calderdale Local Plan sets out a housing requirement of 840 dwellings per annum (dpa) between 1st April 2018 to 31st March 2033. Although the Plan was submitted under transitional arrangements¹, both the Plan and the Council's evidence base make it clear that this figure is based on the application of the Government's standard methodology for calculating housing need and the 'minimum starting point' (as set out in the revised National Planning Policy Framework (NPPF) 2019 and updated Planning Policy Guidance on Housing and Economic Needs Assessment (PPG)).
- 1.2 Following the Stage 1 hearings, the Council published a consultation paper in January 2020 which proposes a higher housing need figure of 997 dpa. This was informed by further work carried out by Turley on economic modelling and the estimated number of dwellings needed to support projected employment growth over the Plan period. In effect it appears to apply an 'economic uplift' to the minimum starting figure of 840 dpa (reflecting paragraph 010 in the PPG).
- 1.3 The Office for National Statistics has recently published new household projections which are 2018-based. The previous PPG (paragraph 016) relating to transitional Plans advises that:

'The government's official population and household projections are generally updated every 2 years to take account of the latest demographic trends. [...] Wherever possible, local needs assessments should be informed by the latest available information. The National Planning Policy Framework is clear that Local Plans should be kept up-to-date. A meaningful change in the housing situation should be considered in this context, but this does not automatically mean that housing assessments are rendered outdated every time new projections are issued.'
- 1.4 The Council has indicated that the proposed housing requirement in the draft Plan is based on the Government's standard methodology, which involves the application of 2014-based household projections as a matter of course. Nevertheless, as Calderdale is a transitional Plan I am writing to the Council to

¹ As set out in paragraph 214 in the National Planning Policy Framework (2019).

obtain your view on whether the 2018-based household projections have any implications for the soundness of the Plan.

- 1.5 The Council is requested to provide a statement, with evidence-based reasons, on whether or not they consider the publication of the 2018-based household projections represents a meaningful change in the housing situation; and if so whether there are any implications for the housing requirement figure in the submitted Plan as proposed to be amended (in the January 2020 consultation paper).
- 1.6 As part of this the Council should confirm whether the higher housing requirement proposed in the January 2020 consultation paper is based on the government's standard methodology, with an economic uplift applied (e.g. taking account of the updated economic modelling). This appears as Question 7n in the Inspector's Pre-Hearing Questions (27th May 2020).
- 1.7 It would be appreciated if the Council could provide a statement by **Friday 24th July 2020**. If you need additional time, please let me know via the PO.
- 1.8 After receipt of the Council's response I will provide an opportunity for other interested parties to comment on the matter. This letter and any responses will need to be published on the examination website at that point.
- 1.9 If you have any questions, please do not hesitate to contact me via the PO.

Katie Child

INSPECTOR