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Secretary of State for Housing  
c/o Planning Policy Consultation Team  
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**Ministry of Housing, Communities and Local Government**  
**Technical consultation on updates to national planning policy and guidance**  
**Evidence Submission: William Wragg MP**

I make this submission in my capacity as the Member of Parliament for the Hazel Grove Constituency. I do so having consulted with local residents and councillors, on not only the present matter, but over a number of recent years following developments in planning policy by the Ministry, and its predecessor DCLG, including on the National Planning Policy Framework, and the Housing White Paper – *Fixing The Broken Housing Market*.

Through this submission, and in my responses to those other related departmental consultations mentioned above, I have sought to represent my constituents' strong views on local planning matters. This has included over 4,000 residents signing petitions to give greater protection to greenbelt land from large scale housing developments.<sup>1&2</sup> The strength of local opinion is clear: The voices from not only my own, but neighbouring constituencies, are also clear: the greenbelt should be safeguarded, and previously developed land (brownfield sites) should instead be prioritised for housing. Greenbelt should not be used for housing development on the massive scale currently being proposed.

**General Remarks**

I am deeply disappointed in the overall direction of travel, objective, and method of the proposals for changes to planning practice guidance on the standard method for assessing local housing need contained within the consultation. I disagree strongly with its main two proposals, namely that 2014-based ONS household projections should provide the demographic baseline for the standard method for a time limited period; and to not allow the 2016-based household projections<sup>3</sup> to be used as a reason to justify lower housing need. **In essence, I disagree with the amendments to revising the standard method for assessing housing need as proposed by the consultation.**

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1 Hansard - 13 December 2016 Volume 618 - P001993

2 Hansard - 23 October 2018 Volume 648 - Column 247 - P002274

3 ONS - Household projections for England – 2016-Based:

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/householdprojectionsforengland>





To do so is, on the one hand, a short-sighted fudge proposing a temporary amendment to the standard method, which will create uncertainty in the medium term as it provides no surety about when this policy will end. **On the other hand, and more worryingly, it represents a clear attempt to by the Ministry to selectively consider evidence which justifies its pre-ordained housing needs figures. It is a departure from evidence based policy making, and is a case of cherry-picking its facts to ensure that the means to justify the ends.**

The proposals seek to disregard inconvenient facts, namely that 2016-base population and household growth forecasts are lower than previously thought when compared to the 2014-based figures. The proposals seek to retrospectively adjust method of calculating housing need in order to justify a preconceived housing target of 300,000. By the consultation's own contextual background the Government's aspiration is to enable the housing market to deliver 300,000 homes a year on average by the mid-2020s, as announced in the 2017 Budget. The 2018 draft National Planning Policy Framework provided a plan for around 266,000 homes across England. Using the standard method based on 2014 ONS household projections 269,000 new homes per year are needed. However, the more recently published 2016-based ONS figures, which forecast slower population growth than previously thought, give rise to a need of only 213,000 new homes per year.

It is clear from the proposals contained herein, that Government has taken a number (from the 2017 Budget), and is now wedded to it, come what may. Now that the population figures on which calculation ought to be based has changed negatively, it seeks to retrospectively 'fix' the formula to get the same, pre-conceived answer. The consultation paper gives reasons, such as providing 'Stability and certainty', 'Maintaining price signals' and 'Consistency with our aspirations', in order to justify, after-the-fact, a return to the pre-conceived housing target of 300,000, in spite of new evidence that future housing demand will be significantly below that figure. This proposals allow the Ministry to simply dismiss a piece of evidence which does not fit its own stated "ambitions", in the hope that more favourable evidence comes along in two years' time. This represents an unacceptable departure from evidence based policy making. The narrative of these *post hoc* justifications also exposes a bias in the Ministry's thinking by making explicit that the direction of travel is only one way.

It is my view that the 2016-base projections should be used and that the ensuing housing need figure of 213,000 be used. The 213,000 figure is also preferable as it is much closer to the number of new homes which were actually delivered in 2017, namely 217,000. The revised target based on the latest figures is therefore much more likely to be achievable. Moreover, it must be remembered through this that method assessing housing need, when translated to local level, provides a minimum figure which local authorities can exceed if they wish. It seems far preferable to set a target that is both more a) warranted, in terms of being in line with more recent population forecasts, and b) achievable, and by 2017 housing delivery figures would have been actually achieved and exceeded than it is to hold local authorities to ransom on unrealistic and unattainably high targets.

Against this backdrop of housing targets the country is seeing the continued destruction of precious habitats and green spaces through the continued erosion of the greenbelt. Yet this





building on the greenbelt is not solving the crisis in supply of affordable housing. The Campaign to Protect Rural England's (CPRE) annual 'State of the Green Belt' report (2018)<sup>4</sup> showed that that 72% of homes built last year on greenfield land within the Green Belt were unaffordable by the government's definition.

In England there are currently 460,000 homes planned to be built on land that will soon be released from the greenbelt, with less than a third of the proposed homes classed as affordable even if council policies are met. In October, Government data showed that almost 10,000 hectares of greenbelt land have been released from 'protected' greenbelt boundaries by local councils since 2012, with ten councils releasing more than 5,000 hectares in the past year alone. The report draws on earlier research carried out by CPRE into brownfield registers, which shows that local authorities in the greenbelt have sufficient brownfield land for over 720,000 homes.<sup>5</sup>

Almost half of the UK' population live in rural, semi-rural, or suburban communities, close to greenbelt land. In order to protect and enhance the countryside, which borders the homes of 30 million people, we need to introduce a genuine brownfield first approach to development. Greenbelt should not be used for housing development on the scale it currently is. The fact is we need more housing, but this should be implemented following a vigorous 'brownfield-first' policy, insisting that brownfield land which has had development on it previously, should be prioritised for the building of houses, and not greenbelt. This would encourage regeneration of towns, make best use of land, and be located where the necessary infrastructure such as transport and local services already exist.

Thanks to the Government's Brownfield Register we know, Greater Manchester has at least 1,000 hectares of brownfield land spread across 439 sites which have not yet been fully developed for housing, enough to build at least 55,000 homes, and it is likely more such land can be found. Stockport has many of these sites which have not yet been developed for housing. Across the country it is estimated by the CPRE there is enough brownfield land for to build some 720,000 homes, which is revised upwards of the 650,000 brownfield sites estimated in 2017 – these brownfield sites have the potential for making a significant contribution to the building the new homes needed.

### **Responses to Consultation Questions**

**Q1: 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?**

***A1: Strongly Disagree.***

***The 2016-based projections must be used to provide the demographic baseline for the standard method. The guidance should not be amended in this way.***

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<sup>4</sup> State of the Green Belt 2018 – CPRE, Campaign to Protect Rural England:  
<https://www.cpre.org.uk/resources/housing-and-planning/green-belts/item/4931-state-of-the-green-belt-2018>

<sup>5</sup> MHCLG (2018) Land use change statistics 2016 to 2017:  
<https://www.gov.uk/government/statistics/land-use-change-statistics-2016-to-2017>





Failure to use the most up-to-date evidence in creating policies is directly contradictory to the rules in the National Planning Policy Framework (NPPF). It is a general requirement of national planning policy, as explicitly stated in paragraph 31 of the 2018 NPPF, that the “preparation and review of all policies should be underpinned by relevant and up-to-date evidence”. The current proposal allows to make exception that this general rule should apply simply for the convenience to suit the current priorities of the Ministry. This is contrary to the spirit of the Framework.

It is also clear that the Ministry has, but its own admission in the consultation paper – under the heading: ‘Consistency with our aspirations’ (page 12) – taken a preconceived housing need target which it seeks to implement, and is determined to justify that target, come-what-may, either by fact or by fiction. This proposal allows the Ministry to simply dismiss a piece of evidence which does not fit its ambitions, in the hope that a more favourable evidence comes along in two years’ time. This represents a departure from evidence based policy making and is totally unacceptable.

Therefore I disagree with the amendment to the guidance for the reasons given above. Nevertheless, should the Ministry proceed with this ill-advised course, then it should be strictly limited to a period of two years. To have the amended guidance, using the 2014-base, stand for any longer than two years, and therefore beyond the publication of the *next* ONS projections (2018-base) would make the guidance even more divorced from the evidence base than currently proposed.

However even with a temporary two year limit, the amendment remains unsatisfactory. Given the proposal is designated as temporary, it is highly foreseeable that in two years’ time, when the 2018-based household projections are published by the ONS, the national planning policy guidance will have to be updated again. To have to go through a similar policy changing process again, in two years’ time, when the figures are next updated would present a considerable drain on the resources of the housebuilding sector and cost to both central and local Government in a further consultation exercise. It also generates considerable uncertainty about what planning policy will be from 2020. It is far preferable to provide greater certainty and confidence in what the policy will be, at least in terms of methodology for determining housing need, and that the outcome of the housing need assessment is updated periodically based on the most up to date and relevant ONS projections as and when they are released.

Therefore, I submit, that the planning practice guidance should not be amended as described.

**Q2: 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?**

**A2: Strongly Disagree.**

The guidance should not be amended in this way. It is both illogical and unacceptable to allow the ONS figures to be subject to directional bias in this way.





The proposal that the latest ONS evidence not to be allowed to lower the housing need targets, but presumably would have been allow to raise the housing need targets, had the population forecast shown an increase. This in essence gives rise to a ratcheting effect and that housing need calculations can be permitted to move up, but not down. It also exposes a bias in the Ministry's thinking by allowing it to selectively consider evidence which justifies its pre-ordained housing needs figures, and making explicit that the direction of travel is only one way.

**Q3: Do you agree with the proposed approach to applying the cap to spatial development strategies?**

**A3: Agree.**

The cap on spatial development strategies spanning multiple local authorities, such as the Greater Manchester Spatial Framework, should apply to the single top line strategic figure rather than at individual local authority level, if, but only if, it will allow greater flexibility within strategic plans, for housing demand to be allocated amongst constituent authorities not purely on a share of population, but to take into account local land supply and availability of suitable sites.

For example, if a combined authority area had plans for 10,000 homes and comprised five constituent local authorities with roughly equal populations, and a cap of 3,000 homes in any one authorities, then it could be reasonable to allocate 2,000 homes to each authority. Yet if one authority had readily available sites for up to 4,000 homes, and another only 1,000 homes worth of sites, it would be preferable to remove the cap on the constituent local authorities to allow that with the greater land availability the opportunity to meet the strategic need across the combined authority area as a whole.

**Q4: Do you agree with the proposed clarifications to footnote 37 and the glossary definition of local housing need?**

**A4: Disagree.**

For the reasons given in answer to Questions 1 and 2, the proposal will result in set targets for housing development that are higher than those required at a national level and those understood by local communities to relate to their genuine housing need, and which have been higher than house-builders can, or are willing to, deliver as evidenced by the 217,000 homes delivered in 2017 against a target of 269,000. It is therefore utterly wrong that local planning authorities will be held to account against these targets when they are, inevitably, not met. The result risks forcing councils to accept any speculative proposal for development, including, for reasons of expedience in meeting targets, or else to risk losing control over development in their area, to accept development on greenfield sites before alternative brownfield sites have been properly explored or fully developed. It therefore hinders the development of a proper 'brownfield-first' policy which is so badly needed and wanted in our planning policy.





**Q5: Do you agree with the proposed clarification to the glossary definition of deliverable?**

No Response.

**Q6: Do you agree with the proposed amendment to paragraph 177 of the National Planning Policy Framework?**

No Response.

**ENDS**

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