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# The Process for Developing Robust Housing Evidence for Local Development Plans

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## **Y broses ar gyfer datblygu tystiolaeth gadarn ynglŷn â thai ar gyfer Cynlluniau Datblygu Lleol**

### **Sylwer:**

Ers cwblhau'r ymchwil hwn ym mis Rhagfyr 2015, mae Llywodraeth Cymru wedi cyflwyno Argraffiad 8 o Bolisi Cynllunio Cymru sy'n cynnwys eglurhad o'r asesiad o'r amcanestyniadau aelwydydd, yn enwedig y pwysoliad sydd i'w roi i amcanestyniadau a'r ystod o faterion i'w hystyried yn rhan o'r sail dystiolaeth ar gyfer y ffigyrau gofyniad tai mewn Cynlluniau Datblygu Lleol. Mae'r Sefydliad Cynllunio Trefol Brenhinol yng Nghymru yn croesawu'r eglurhad hwn a'r canllawiau ychwanegol ar asesu amcanestyniadau aelwydydd mewn egwyddor.

Rydym yn pwysleisio'r angen brys i ddatblygu sgiliau i sicrhau bod gan Awdurdodau Cynllunio Lleol y wybodaeth dechnegol a'r gallu ystadegol i wneud y gwaith a amlinellir ym mharagraff 9.2.2 o Bolisi Cynllunio Cymru, sy'n cynnwys modelau i ddarparu gwahanol sefyllfaoedd ar gyfer amcanestyniadau Llywodraeth Cymru. Mae adnoddau ar gyfer hyfforddiant o'r fath yn bryder mawr i'r Sefydliad Cynllunio Trefol Brenhinol yng Nghymru, o ystyried y cyfyngiadau parhaus ar gyllidebau Awdurdodau Cynllunio Lleol, ac rydym yn credu y dylai'r Sefydliad Cynllunio Trefol Brenhinol yng Nghymru, Llywodraeth Cymru a rhanddeiliaid eraill weithio gyda'i gilydd i ddarparu mwy o hyfforddiant a datblygu cyfleoedd i ddatblygu sgiliau dehongli, addasu a mireinio data amcanestyniadau aelwydydd at ddibenion cynllunio'r defnydd o dir fel y nodir yn argymhellion yr ymchwil hwn.

## **The Process for Developing Robust Housing Evidence for Local Development Plans**

### **Note**

Since completion of this research in December 2015, the Welsh Government have issued Edition 8 of Planning Policy Wales which includes clarification on the assessment of household projections, in particular the weight to be given to projections and the range of issues to be considered as part of the evidence base for the housing requirement figures in Local Development Plans. RTPI Cymru welcomes the clarifications and further guidance on assessing household projections in principle.

We stress the urgent need for the development of skills to ensure LPAs have the technical knowledge and statistical ability to undertake the work outlined in PPW para 9.2.2, which includes modelling to provide alternative scenarios to the Welsh Government's projections. Resources for such training is a major concern for RTPI Cymru, given continued budget constraints for LPAs and we believe that the RTPI, Welsh Government and other stakeholders should work together to deliver further training and skills development opportunities on interpreting, adapting and refining household projections data for land use planning purposes as set out in the recommendations of this research.

## Y broses ar gyfer datblygu tystiolaeth gadarn ynglŷn â thai ar gyfer Cynlluniau Datblygu Lleol

### Crynodeb gweithredol

Crynodeb yw hwn o ymchwil a gomisiynwyd gan y Sefydliad Cynllunio Trefol Brenhinol yng Nghymru i archwilio'r defnydd o amcanestyniadau aelwydydd a'r dull o'u dehongli wrth baratoi Cynlluniau Datblygu Lleol. Cynhaliwyd yr ymchwil mewn ymateb i ansicrwydd rhai awdurdodau cynllunio lleol, a phryderon ynghylch faint o hyblygrwydd sydd ganddynt wrth ddehongli amcanestyniadau aelwydydd. Mae'r ymchwil – a wnaed gan Ysgol Gynllunio a Daearyddiaeth Prifysgol Caerdydd – yn seiliedig ar gyfweiliadau gydag amrywiaeth eang o randdeiliaid a chyfres o astudiaethau achos. Mae'r adroddiad llawn ar yr ymchwil ar gael yn <http://www.rtpi.org.uk/the-rtpi-near-you/rtpi-cymru/policy-in-wales/wales-planning-research-agenda/process-for-developing-housing-evidence-for-ldps/>

#### *Cynlluniau Datblygu Lleol a Thai*

Mae'n ofynnol i bob awdurdod lleol yng Nghymru baratoi Cynllun Datblygu Lleol. Mae Cynlluniau Datblygu Lleol yn ddogfennau statudol pwysig, ac mae ganddynt swyddogaeth bwysig wrth gynllunio ar gyfer tai. Mae'n ofynnol i awdurdodau cynllunio lleol asesu gofynion tai eu hardal, a chynnwys polisiâu a dyraniadau yn eu Cynlluniau Datblygu Lleol i gefnogi'r ddarpariaeth o dai.

#### *Amcanestyniadau aelwydydd*

Mae polisiâu cynllunio Llywodraeth Cymru yn nodi y dylai amcanestyniadau aelwydydd lefel awdurdod lleol Llywodraeth Cymru fod yn fan cychwyn pan fydd awdurdodau cynllunio lleol yn asesu eu gofynion tai. Mae awdurdodau cynllunio lleol hefyd yn cymryd i ystyriaeth ystod o ddata a thystiolaeth arall wrth baratoi eu Cynllun Datblygu Lleol.

Mae amcanestyniadau aelwydydd awdurdodau lleol Llywodraeth Cymru yn amcanestyniadau sy'n seiliedig ar dueddiadau, ac maent yn amcangyfrif nifer yr aelwydydd newydd yn y dyfodol fesul ardal awdurdod lleol dros gyfnod o 25 mlynedd. Cânt eu rhyddhau bob dwy neu dair blynedd, a rhyddhawyd yr amcanestyniadau aelwydydd diweddaraf yn 2014. Defnyddir yr amcanestyniadau aelwydydd hyn ar gyfer ystod eang o weithgareddau, gan gynnwys cynllunio'r defnydd o dir.

#### *Canfyddiadau allweddol*

- **Amcanestyniadau aelwydydd.** Mae amcanestyniadau aelwydydd lefel awdurdodau lleol Llywodraeth Cymru yn ddull gwerthfawr o asesu gofynion tai mewn Cynlluniau Datblygu Lleol. Mae rhanddeiliaid yn deall natur amcanestyniadau aelwydydd a rhai o'r cyfyngiadau wrth eu defnyddio at ddibenion cynllunio'r defnydd o dir. Gwneir llai o ddefnydd o amcanestyniadau aelwydydd amrywiol a gyflwynir ochr yn ochr â'r prif amcanestyniadau aelwydydd. Mae'r amcanestyniadau aelwydydd amrywiol yn newid rhai o'r tybiaethau ynglŷn â newidiadau mewn poblogaeth ac aelwydydd, a gallant fod yn ddefnyddiol ar gyfer cynllunio'r defnydd o dir. Mae'r ymchwil yn nodi bod awdurdodau cynllunio lleol yn gallu gwroddi wrth amcanestyniadau aelwydydd Llywodraeth Cymru pryd y gallant ddarparu tystiolaeth gadarn bod hyn yn briodol.
- **Llywodraeth Cymru a'i pholisiâu cynllunio.** Mae Llywodraeth Cymru wedi darparu cymorth gwerthfawr i awdurdodau cynllunio lleol gyda'r dasg o baratoi Cynlluniau Datblygu Lleol. Ar y cyfan, mae cynnwys Polisi Cynllunio Cymru yn addas i'w ddiben, ac nid oes angen ymestyn

y polisi cynllunio cenedlaethol ar amcanestyniadau aelwydydd a'r defnydd ohonynt mewn Cynlluniau Datblygu Lleol. Byddai mân fireinio cynnwys Polisi Cynllunio Cymru yn ddefnyddiol. Eglurodd Llywodraeth Cymru ei pholisïau cynllunio ynglŷn â'r defnydd o amcanestyniadau aelwydydd mewn Llythyr Egluro Polisi yn 2014. O ganlyniad, mae rhai awdurdodau cynllunio lleol yn nodi bod newid pwyslais wedi digwydd yn y modd y dylid bellach ddefnyddio'r amcanestyniadau aelwydydd wrth baratoi Cynlluniau Datblygu Lleol.

- **Data lleol a mireinio amcanestyniadau aelwydydd.** Mae ystod eang o ddata sy'n rhwydd cael gafael arno ar gael i awdurdodau cynllunio lleol a rhanddeiliaid eraill er mwyn dadansoddi a mireinio amcanestyniadau aelwydydd Llywodraeth Cymru ar lefel lleol. Bu datblygu methodoleg a rennir ar gyfer mireinio amcanestyniadau aelwydydd, a datblygu amcanestyniadau amrywiol gan ddefnyddio gwahanol dybiaethau, yn ddefnyddiol iawn. Gall peth o'r data – yn enwedig data ynghylch mudo a maint aelwydydd – amrywio'n sylweddol dros amser. Gall yr amrywiadau hyn arwain at niferoedd aelwydydd sy'n wahanol iawn pan gaiff tueddiadau byrdymor eu hamcanu ymlaen dros gyfnodau hirach.
- **Sgiliau, arbenigedd a hyfforddiant.** Mae'r ymchwil yn nodi bod y sgiliau a'r arbenigedd ar gyfer dehongli ac addasu data amcanestyniadau aelwydydd yn amrywio'n sylweddol rhwng awdurdodau cynllunio lleol. Mae faint o'r sgiliau hyn sydd ar gael mewn awdurdodau lleol wedi gostwng dros amser. Mae'r prinder sgiliau ac arbenigedd mewn rhai awdurdodau cynllunio lleol yn golygu nad yw amcanestyniadau aelwydydd yn cael eu cymhwyso i amgylchiadau lleol mewn modd priodol bob amser. Mae'r prinder sgiliau ac arbenigedd hefyd yn golygu nad yw awdurdodau cynllunio lleol yn gallu amddiffyn gofyniad cynllun anheddiad sy'n uwch neu'n is na'r hyn a awgrymir yn wreiddiol gan amcanestyniadau aelwydydd Llywodraeth Cymru. Mae atebion ymarferol i'r diffyg sgiliau hyn yn cynnwys rhannu arbenigedd ac adnoddau rhwng awdurdodau cynllunio lleol, a defnyddio ymgynghorwyr cynllunio neu ymgynghorwyr eraill.
- **Archwilio Cynlluniau Datblygu Lleol.** Rhoddir cryn bwysau i amcanestyniadau aelwydydd Llywodraeth Cymru wrth archwilio Cynlluniau Datblygu Lleol. Cyflwynir ystod eang iawn o wahanol ofynion tai wrth archwilio, yn dibynnu ar y tybiaethau a wnaed gan y rhai a gymerodd ran yn y broses o lunio'r cynllun. Mae prosesau archwilio'n gadarn, ac yn caniatáu ar gyfer dull sy'n seiliedig ar dystiolaeth o asesu gofynion tai. Mae prosesau archwilio'n effeithiol wrth nodi anghysondebau yn y dadleuon a'r dystiolaeth a gyflwynwyd wrth archwilio. Mae'r broses archwilio hefyd yn annog camau i fireinio data a thystiolaeth wrth i'r broses fynd yn ei blaen. Yr her i awdurdodau cynllunio lleol yw cadw eu dystiolaeth yn gyfredol, er y gall y broses archwilio ymdrin â data diwygiedig Llywodraeth Cymru ar amcanestyniadau aelwydydd hyd yn oed ar gamau diweddarach yn y broses.

## Argymhellion

Mae'r prosiect yn nodi sawl argymhelliad, gyda'r pwyslais ar y canlynol:

- Darparu rhagor o gyfleoedd hyfforddi a datblygu sgiliau er mwyn galluogi awdurdodau cynllunio lleol a rhanddeiliaid eraill i ddehongli, mireinio ac addasu data amcanestyniadau aelwydydd;
- Gwneud mân ddiwygiadau ac esboniadau i Bolisi Cynllunio Cymru;

- Paratoi canllaw arfer da ynglŷn â'r defnydd o amcanestyniadau aelwydydd wrth baratoi Cynlluniau Datblygu Lleol; ac
- Archwilio datblygiad amcanestyniadau aelwydydd lefel awdurdodau lleol Llywodraeth Cymru gan ddefnyddio data am dueddiadau tymor hirach i fod yn adlewyrchiad gwell o gymeriad a dibenion y system gynllunio.

# The Process for Developing Robust Housing Evidence for Local Development Plans

## Executive summary

This is a summary of research commissioned by Royal Town Planning Institute Cymru to explore the use and interpretation of household projections in preparing Local Development Plans. The research was carried out in response to some local planning authorities' uncertainty and concerns about how much flexibility they have to interpret household projections. The research – carried out by Cardiff University School of Planning and Geography - is based on interviews with a wide range of stakeholders and a series of case studies. The full report of the research can be found at <http://www.rtpi.org.uk/the-rtpi-near-you/rtpi-cymru/policy-in-wales/wales-planning-research-agenda/process-for-developing-housing-evidence-for-ldps/>

### *Local Development Plans and housing*

Each local planning authority in Wales is required to prepare a Local Development Plan. Local Development Plans are important, statutory documents and play a significant role in planning for housing. Local planning authorities have to assess housing requirements for their area and include policies and allocations in their Local Development Plans to support the delivery of housing.

### *Household projections*

Welsh Government planning policies state that Welsh Government local authority level household projections should form the starting point when local planning authorities assess their housing requirements. Local planning authorities also take into account a range of other data and evidence in preparing their Local Development Plan.

Welsh Government local authority household projections are trend-based projections and estimate the future number of new households by local authority area over a 25 year period. They are released every two to three years and the latest household projections were released in 2014. These household projections are used for a wide range of activities including land-use planning.

### *Key findings*

- **Household projections.** The Welsh Government local authority level household projections are a valuable mechanism for assessing housing requirements in Local Development Plans. Stakeholders understand the nature of household projections and some of the limitations in using them for the purpose of land-use planning. There is less use of variant household projections issued alongside the principal household projections. The variant household projections vary some of the assumptions about population and household change and can be useful for land-use planning. The research identifies that local planning authorities can deviate from the Welsh Government household projections where they can provide robust evidence that this is appropriate.
- **The Welsh Government and its planning policies.** The Welsh Government has provided valuable support for local planning authorities with the task of preparing Local Development Plans. The content of Planning Policy Wales is generally fit for purpose and there is no need for an extension of national planning policy on household projections and their use in Local Development Plans. Some minor refinement of the content of Planning Policy Wales would

be useful. The Welsh Government clarified its planning policies on the use of household projections in a Policy Clarification Letter in 2014. This has resulted in some local planning authorities stating that there has been a change in emphasis on how household projections should now be used when preparing Local Development Plans.

- **Local data and refinement of the household projections.** There is a wide range of easily accessible data available to local planning authorities and other stakeholders to interrogate and refine the Welsh Government household projections at local level. The development of a shared methodology for refining household projections and developing variant projections using different assumptions has been very useful. Some of the data, particularly data for migration and household size, can vary considerably over time. These variations can lead to widely differing household numbers when short-term trends are projected forward over longer timescales.
- **Skills, expertise and training.** The research identifies that the skills and expertise to interpret and adapt household projections data varies considerably between local planning authorities. The availability of these skills within local planning authorities has declined over time. The limited skills and expertise in some local planning authorities means that household projections are not always applied to local circumstances in an appropriate way. The limited skills and expertise also mean that local planning authorities cannot always defend a plan's dwelling requirement that is above or below that initially implied by the Welsh Government household projections. Practical solutions to this skills deficit include sharing expertise and resources between local planning authorities and using planning or other consultants.
- **Examination of Local Development Plans.** The Welsh Government household projections are given considerable weight in examination of Local Development Plans. A very wide range of different housing requirements are presented during examination depending on the assumptions made by participants in the plan-making process. Examination processes are robust and allow an evidence-based approach to assessing housing requirements. Examination processes are effective in identifying inconsistencies in the arguments and evidence presented at examination. The examination process also encourages the refinement of data and evidence as the process progresses. The challenge is for local planning authorities to keep their evidence up-to-date, although the examination process can deal with revised Welsh Government household projections data even at later stages of the process.

## **Recommendations**

The project makes several recommendations focusing on:

- Delivering further training and skills development opportunities so that local planning authorities and other stakeholders can interpret, refine and adapt household projections data;
- Making minor amendments and clarifications to Planning Policy Wales;
- Preparing a good practice guide on the use of household projections in preparing Local Development Plans; and
- Exploring the development of Welsh Government local authority level household projections using longer-term trend data to better reflect the character and purposes of the planning system.

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# 1. The process for developing robust housing evidence for Local Development Plans

## Introduction and context

The Royal Town Planning Institute Cymru (RTPI Cymru) commissioned research in September 2015 'to identify issues in the interpretation of housing projections and make initial recommendations for improvement as appropriate'<sup>1</sup>. The project specification identified that some local planning authorities had expressed uncertainty about how much flexibility they have to interpret Welsh Government local authority household projection figures when preparing Local Development Plans. The project specification referred to anecdotal evidence that revised figures which depart from the Welsh Government local authority level household projections have not always been supported at Local Development Plan examination. Finally, the project specification also noted that the latest 2011-based local authority level household projections, released in 2014, report substantial decreases in projected households for most local planning authorities in Wales.

Many recently adopted Local Development Plans will have been prepared in the context of higher figures for household projections than have been projected in the most recent household projections. The client specification notes that this may have led to more land being allocated in Local Development Plans for housing than is required. The project specification also identified a series of related concerns in relation to Joint Housing Land Availability Studies and the ability of local planning authorities to ensure a five year supply of land for housing. This sits within a context of further concerns for the level of new homes being constructed, the affordability of housing, and economic growth and regeneration.

## The purpose of the research

The purpose of the research is stated in the project specification as:

(1) To establish evidence to indicate:

- i) How local planning authorities interpret and use the Welsh Government projections, in particular how they consider the appropriateness of the projections for their area, taking into account specific local issues;
- ii) Welsh Government views on the role intended for household projections - essentially, exploring their own interpretation of their own policies on projections being a starting point;
- iii) Views of Welsh Government on the projections used in local planning authorities' submitted plans, if they are different to those set out in the national projections;
- iv) How Inspectors at examination consider the quality and robustness of the evidence given at examination for concluding with figures different to those set out in the national projections.

(2) Depending on the findings of the study, consider and propose ways in which uncertainties around the projections could be reduced.

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<sup>1</sup> RTPI Cymru. 2015. The process for developing robust housing evidence for Local Development Plans, Invitation to Tender, August 2015.

## **The approach to the research**

A research team in the School of Planning and Geography at Cardiff University was appointed to undertake the research. The research was carried out between September and December 2015. The research comprised the following elements:

- a desk-based review of existing policy, research and literature on the use of household projections in Local Development Plan preparation;
- A series of one-to-one interviews with key stakeholders. The stakeholders included various divisions of Welsh Government, local planning authorities, professional bodies and interest groups, The Planning Inspectorate, as well as planning consultancies;
- An open invitation to local planning authorities to submit evidence, representations and other material to inform the study. The local planning authorities that submitted responses are identified in an appendix;
- A set of three case studies of Local Development Plans, carried out principally by a study of the relevant examination libraries and complemented, where possible, by an interview with the lead officer for each of the local development plans. The case studies were of Carmarthenshire, Denbighshire and Newport;
- A focus group to examine the initial findings of the project and develop conclusions and recommendations. Welsh Government, The Planning Inspectorate, The Home Builders Federation, local planning authorities and the planning consultancy sector attended the focus group.

## **The structure of this report**

This main sections of this report are structured as follows:

- Section 2 sets the scene for the project by documenting the role of Welsh Government household projections in the preparation of Local Development Plans;
- Section 3 explores a range of different stakeholders' perspectives on the use of the Welsh Government household projections in preparing Local Development Plans;
- Section 4 focuses on local planning authorities' perspectives on the same issue;
- Section 5 documents three case studies of Local Development Plans and examines the role played by the Welsh Government household projections;
- Section 6 outlines the project's main conclusions and sets out a short series of recommendations.

## **2. Setting the scene: household projections and their use in Local Development Plans**

### **Introduction**

This section explains the role of Welsh Government household projections in the preparation of Local Development Plans. The section (1) explains what the household projections are, (2) summarises other research into the use of household projections in Local Development Plans, (3) outlines Welsh Government planning policy on the use of household projections in assessing housing requirements, and (4) captures key points from recent evaluations of the 2011-based Welsh Government household projections. The section concludes with key findings based on a review of policy and published documents.

### **Local Development Plans and housing land**

Each local planning authority in Wales is required to prepare a Local Development Plan. The Local Development Plan is an important statutory document and is the cornerstone of a plan-led system. Local Development Plans play an important part in new housing provision by assessing housing requirements in their area and setting out policies and allocations for the delivery of housing. Local Development Plans are also required to quantify the housing requirement for their area for both market and affordable housing. Planning Policy Wales at paragraph 9.2.2 states that 'The latest Welsh Government local authority level Household Projections should form the starting point for assessing housing requirements' and identifies a range of other issues that local planning authorities must take into account.

### **Welsh Government household projections**

The Welsh Government states that 'household projections are trend-based projections that provide estimates of the future numbers of households and are based on population projections and assumptions about household composition and characteristics'<sup>2</sup>. Data on household projections is used to inform a wide range of different activities, and land use planning is only one of these. It is important to recognise that the household projections are not developed specifically for the purposes of the land use planning system, although they are clearly important in land use planning.

The 2011-based household projections for Wales are the latest release and project forward the trend-based assumptions for the 25 year period from 2011 to 2036. The household projections data is provided at national level and also at local authority level. Welsh Government local authority level household projections have been available since 2008 when the 2006-based household projections were released. Sub-national population and household projections were not published by Welsh Government prior to 2008 and local planning authorities adopted different methodologies for identifying housing land requirements than are used now. The statistical releases of household projections include local authority areas but do not include figures for National Park Authorities either individually or collectively.

The household projections data include both the principal projections and variant projections. The principal projections are based on fertility, mortality and migration data over a five year period. The variant projections make different assumptions about fertility and mortality rates, or about migration rates. The 2011-based projections also included for the first time a variant projection with an average migration rate calculated over a longer, ten year period.

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<sup>2</sup> Statistics for Wales. 2014. Household projections for Wales (2011-based). First Release. 27 February 2014.

The Welsh Government point out that the assumptions underpinning the household projections are generally based on past trends, and that the household projections do not make allowance for the effects of government policies or socio-economic factors. The release of household projections data is accompanied by statements that highlight the limitations of using data of this kind<sup>3</sup>, including:

- that the household projections are not policy-based forecasts;
- that they only indicate what may happen in future should the trend-based assumptions become true;
- that projections become increasingly uncertain the further they are carried forward;
- that the relative impacts of assumptions made about migration, mortality, fertility and household formation will vary between local authorities;
- that it is unlikely for any projections to be completely accurate as many varied factors, including those outside of the United Kingdom, will influence the components of population change;
- that trends in population and household growth have varied considerably over the previous decade.

The basis on which household projections data should be used is therefore set out clearly. The assumptions made and the limitations in their use are also clearly stated. The variant projections also highlight the point that the household projections are based on key assumptions about data and trends, and that varying these may have significant effects on the number of projected households.

#### **The National Assembly for Wales' review of the use of population and household projections in Local Development Plans**

The use of population and household projections for the purposes of land use planning was the focus of examination by the National Assembly for Wales Environment and Sustainability Committee in early 2013. The Committee received evidence from local authorities, Welsh Government and The Planning Inspectorate, and also explored some of the outcomes of recent LDP examinations. The Committee wished to explore the practicality and feasibility of Local Planning Authorities in Wales producing their own population and household forecasts that were robust enough to enable them to deviate from the projections produced by the Welsh Government. The examination of these issues was carried out prior to the release of the 2011-based Welsh Government household projections and as discussion on planning reforms in Wales was taking place. The Committee concluded that it was practically feasible for local planning authorities to produce their own population and household forecasts, given the availability of software and data<sup>4</sup>. However, the Committee also noted that this area of work is complex and requires specific expertise, which varied between local planning authorities. The Committee also anticipated that changes proposed to the planning system would lead to a more regional approach to planning, including those aspects related to housing requirements.

The Committee made two recommendations focused on (1) strengthening the ability of local planning authorities to develop their own population and housing forecasts, and (2) examining whether a longer timeframe from which to base projections would enhance their robustness. The Minister's response welcomed the findings of the Committee, especially on the point that it is

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<sup>3</sup> Statistics for Wales. 2014. Household projections for Wales (2011-based). First Release. 27 February 2014.

<sup>4</sup> Local Development Plans - Population and household forecasts. Letter from Lord Dafydd Elis-Thomas AM, Chair of Environment and Sustainability Committee to Carl Sargeant AM, Minister for Housing and Regeneration, Welsh Government, dated 6th August 2013.

practical and feasible for local planning authorities to produce their own population and household forecasts. This was interpreted as validation of the Welsh Government's policy and confirmation 'that LPAs can indeed deviate from our latest population and household projections where their evidence indicates otherwise'<sup>5</sup>. The response also noted positively that strategic planning and cross-boundary working would be addressed in planning reforms, and that 2011-based variant projections were being developed using longer time frames for migration.

### **Welsh Government planning policy on the use of household projections in Local Development Plan Preparation**

The preceding section highlighted the emphasis in Planning Policy Wales<sup>6</sup> on the latest Welsh Government local authority level Household Projections for Wales acting as 'the starting point' for assessing housing requirements. Planning Policy Wales also provides additional policy on the use of the household projections. It states local planning authorities 'should consider the appropriateness of the projections for their area' using all sources of local evidence. Importantly, Planning Policy Wales states that 'Where local planning authorities seek to deviate from the Welsh Government projections, they must justify their own preferred policy-based projections by explaining the rationale behind them in terms of the issues listed at paragraph 9.2.1'. Paragraph 9.2.1. of Planning Policy Wales lists a variety of issues that need to be taken into account, including the latest household projections, local housing requirements, the capacity of an area in terms of social, cultural and environmental factors, climate change and infrastructure capacity, among others.

The Minister for Housing and Regeneration issued Policy Clarification Letter CL-01-14 in April 2014 on the use of the 2011-based household projections for land use planning purposes. Policy Clarification Letters are used to 'provide urgent clarification of policy or procedure issued by the Minister or Planning Division'. The letter followed the publication of the 2011-based Household Projections for Wales and reminded local planning authorities of Welsh Government's policy and expectations in this area. The letter noted that the 2011-based household projections had been 'significantly affected by recent past economic conditions resulting from the global economic crisis'. It also noted that 'it is not prudent for a Plan, looking 15-20 years ahead to replicate a period of exceptionally poor economic performance'. The letter also clarified that 'local planning authorities must seek to provide for the level of housing required as the result of the analysis of **all** relevant sources of evidence rather than relying solely on the Welsh Government's household projections'.

### **Trends reflected in the 2011-based household projections for Wales**

The Policy Clarification Letter discussed above is in part a response to the very different household projection figures for local authorities included in the 2011-based household projections when compared with the 2008-based household projections. The 2011-based household projections for Wales utilise data from the 2011 Census, while the 2008-based household projections relied on the 2001 Census for a number of assumptions. Household projections data using recent Census data are typically considered to be more accurate as they are based on Census population data rather than mid-year estimates. In addition, all household projections reflect the population and household formation changes of the preceding period from which the trend has been derived. The 2011-based projections are no different in this sense from the 2008-based projections.

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<sup>5</sup> Letter from Carl Sargeant AM, Minister for Housing and Regeneration, Welsh Government to Lord Dafydd Elis-Thomas AM, Chair of Environment and Sustainability Committee, dated 13th September 2013.

<sup>6</sup> Edition 7 of Planning Policy Wales, released in July 2014, was the latest edition at the time of the research being carried out.

The 2011-based household projections data therefore reflect population and household formation trends over a time-frame that includes a period of economic recession. Household formation rates during the period 2001-2011 were lower compared to historic trends. The period also shows an increase in average household size, which has been attributed to a range of factors, including younger people staying in the parental home longer due to factors such as job instability and difficulties in accessing mortgage finance. Additionally, migration assumptions for the principal 2011-based household projections are derived from the preceding five year period and therefore will be impacted upon by the lower migration rates seen during the most recent recession.

The effects of the above on the number of projected households varies by local authority. The households projected for two local authorities - Newport and Wrexham - show an increase with the release of the 2011-based household projections. Every other local authority shows a reduced household projection figure when comparing the 2008-based with the 2011-based projections. Table 1 shows the change between the 2008-based and 2011-based household projections by unitary authority. The reduction in projected households is very significant for many local authority areas, with over half of local authority areas seeing a reduction in the number of projected households of over 50%. The very different household projections figures arising from the 2008-based and 2011-based projections create an unstable and uncertain environment in which to plan for housing and calculate a housing land requirement in a Local Development Plan.

### **Interpreting the 2011-based household projections for Wales**

The very significant differences in projected household numbers between the 2008-based and 2011-based household projections have resulted in a series of documents exploring what these differences may be attributed to and whether the 2011-based projections are consistent with longer-term trends. A report by Nathaniel Lichfield and Partners<sup>7</sup> for a consortium of house builders and the Home Builders Federation highlights the fact that the 2011-based household projections reflect a period of economic recession. The report argues that the 2011-based household projections underestimate the number of new houses that are likely to be needed in Wales in the period 2011-2031 by some 63,200 dwellings. The report assumes that recovery from economic recession will see a return to trends occurring prior to recession, and re-bases the 2011-based household projections by using an index of the 2008-based projections. Detailed evidence is given in the report to support the argument that it presents significant risks to plan for levels of household change identified in the 2011-based household projections. Other planning consultancies<sup>8</sup> in Wales have also analysed the changes for projected household numbers arising from the 2011-based household projections. These analyses also highlight the effects of the recession on household formation and migration, and argue that the 2011-based household projections need to be used with a degree of caution.

The most recent of the significant commentaries and evidence on housing in Wales is the report of the Public Policy Institute for Wales – an organisation funded in part by Welsh Government - on Future Need and Demand for Housing in Wales<sup>9</sup>. This report is not a simple projection of past trends, but does establish estimates of need and demand for housing in Wales for the period 2011-2031. The report produces two estimates - one based on official Welsh Government projections for household formation of 174,000 households, and an alternative projection of 240,000 households

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<sup>7</sup> Nathaniel Lichfield and Partners. 2015. Assessing the Need for Housing in Wales. A re-evaluation of the Welsh Government 2011-based Household Projections. May 2015.

<sup>8</sup> Barton Willmore. 2014. 2014 Household projections for Wales. Barton Willmore Guidance Note.

<sup>9</sup> Public Policy Institute for Wales. 2015. Future Need and Demand for Housing in Wales. September 2015.

that builds in a return to earlier trends in household formation. The alternative projection leads to a significantly higher estimate of need and demand, some 66,000 units higher than the principal projection. The report also extends to consideration of market and social sector housing. The report argues that 'if future need and demand for housing in Wales is to be met, then there needs to be a return to rates of house building not seen for almost 20 years'.

### **Setting the scene: summary of findings based on review of policy and related literature**

This account of the policy context and related commentaries provides the basis for some preliminary findings:

- Welsh Government local authority level Household Projections for Wales play an important role as a 'starting point' for assessing housing requirements in Local Development Plans. This is set out clearly in Planning Policy Wales.
- The information accompanying statistical releases for Household Projections for Wales clearly identifies how household projections are calculated and explains some of the limitations that arise in using household projections.
- The National Assembly for Wales Environment and Sustainability Committee found that it was feasible and practical for local planning authorities to produce their own population and household forecasts, yet expressed some reservations about the availability of suitable expertise in local planning authorities. It also suggested extending the time period used for projecting migration trends.
- The 2011-based Welsh Government local authority Household Projections for Wales have generated renewed discussion on the use of household projections in preparing Local Development Plans. This has arisen because of the marked difference in the number of projected households for most local authorities between the 2008-based and 2011-based projections.
- The marked reduction in projected households for the majority of local authority areas is seen by some as a reflection of changing rates of household formation and migration patterns during a period of economic recession. Some studies have anticipated a return to longer-term trends with emergence from recession and argue that the 2011-based household projections should be used with a degree of caution.
- The extent of the change in projected household numbers, as well as how that data was being interpreted, led the Welsh Government to issue an 'urgent' Policy Clarification Letter on the use of household projections for land use planning purposes.

**Table 1: Change between 2008 and 2011 household projections for Wales by Unitary Authority**

	2011 to 2016				2011 - 2021				2011 - 2026			
	2008-based Projection	2011-based Projection	Absolute change	Percentage change	2008-based Projection	2011-based Projection	Absolute change	Percentage change	2008-based Projection	2011-based Projection	Absolute change	Percentage change
Isle of Anglesey	1398	452	-946	-67.7%	2593	764	-1829	-70.5%	3544	886	-2658	-75.0%
Gwynedd	1977	1246	-731	-37.0%	3868	2773	-1095	-28.3%	5533	4300	-1233	-22.3%
Conwy	2194	792	-1402	-63.9%	4310	1443	-2867	-66.5%	6136	1881	-4255	-69.3%
Denbighshire	2736	1113	-1623	-59.3%	5450	2208	-3242	-59.5%	7929	3148	-4781	-60.3%
Flintshire	2927	1742	-1185	-40.5%	5451	3214	-2237	-41.0%	7386	4359	-3027	-41.0%
Wrexham	3469	3379	-90	-2.6%	6801	6678	-123	-1.8%	9851	9855	4	0.0%
Powys	3819	1848	-1971	-51.6%	7306	3455	-3851	-52.7%	10314	4535	-5779	-56.0%
Ceredigion	1547	687	-860	-55.6%	3117	1457	-1660	-53.3%	4472	2056	-2416	-54.0%
Pembrokeshire	3000	1468	-1532	-51.1%	5698	2790	-2908	-51.0%	7998	3827	-4171	-52.2%
Carmarthenshire	5909	2704	-3205	-54.2%	11595	5416	-6179	-53.3%	16634	7886	-8948	-53.2%
Swansea	6276	4501	-1775	-28.3%	12420	9262	-3158	-25.4%	18290	13913	-4377	-23.9%
Neath Port Talbot	3680	768	-2912	-79.1%	7060	1610	-5450	-77.2%	10066	2319	-7747	-77.0%
Bridgend	3786	2265	-1521	-40.2%	7352	4364	-2988	-40.6%	10604	6164	-4440	-41.9%
Vale of Glamorgan	3482	1998	-1484	-41.8%	6682	3909	-2773	-41.5%	9561	5599	-4002	-41.9%
Cardiff	14122	10959	-3163	-22.4%	28796	22721	-6075	-21.1%	43122	34790	-8332	-19.3%
Rhondda Cynon Taf	4013	2645	-1368	-34.1%	7682	5052	-2630	-34.2%	10821	7068	-3753	-34.7%
Merthyr Tydfil	941	601	-340	-36.1%	1721	1167	-554	-32.2%	2321	1601	-720	-31.0%
Caerphilly	3749	1829	-1920	-51.2%	6976	3500	-3476	-49.8%	9653	4780	-4873	-50.5%
Blaenau Gwent	1458	258	-1200	-82.3%	2668	517	-2151	-80.6%	3599	588	-3011	-83.7%
Torfaen	934	771	-163	-17.5%	1665	1457	-208	-12.5%	2133	1945	-188	-8.8%
Monmouthshire	2095	728	-1367	-65.3%	3969	1351	-2618	-66.0%	5441	1781	-3660	-67.3%
Newport	2604	2466	-138	-5.3%	5070	5197	127	2.5%	7136	7987	851	11.9%

Source: Knowledge and Analytical Services, Welsh Government (2010) Local Authority Household Projections for Wales, 2008-2033, StatsWales, <https://statswales.wales.gov.uk/Catalogue/Housing/Households/Projections/Local-Authority/2008-Based/Households-by-LocalAuthority-Year> & Knowledge and Analytical Services, Welsh Government (2014) 2011-based household projections for local authorities in Wales, 2011 to 2036, StatsWales, <https://statswales.wales.gov.uk/Catalogue/Housing/Households/Projections/Local-Authority/2011-Based/HouseholdProjections-by-LocalAuthority-Year>

### **3. Stakeholder perspectives on the use of household projections in preparing Local Development Plans**

#### **Introduction**

This section of the report is based on one-to-one interviews with stakeholders with an interest in planning for housing and especially the use of household projections in assessing housing requirements in Local Development Plans. The views of selected local planning authority interviewees are included here, although a later section of the report focuses specifically on local planning authorities' perspectives.

#### **Household projections**

##### *Household projections as a useful starting point*

The Welsh Government local authority level household projections are widely considered to be useful as a clear reference point to support work on Local Development Plans. There is a strong view that the activity of assessing housing requirements has to start somewhere, and that the household projections are a logical, robust and useful starting point for doing this. The household projections also receive support for being produced at national level, applying a consistency of method, and being robust and transparent.

Stakeholders understand that the projection figures are simply the projection into the future of a series of recent trends. They are recognised by stakeholders as being a projection and not a forecast. The household projections are considered to be accurate in so far as they are a projection of past trends. The household projections were also recognised by one Welsh Government stakeholder as having reached a considerable degree of refinement, considering the data sources used and the degree of uncertainty that exists in carrying out projections. This suggests that the Welsh Government household projections are a valuable source of information in assessing housing requirements in Local Development Plans.

The household projections as a future projection of a past trend are also welcomed for not being 'politically influenced', in that they do not reflect the political objectives of Welsh Government or any other stakeholder. This is made clear in the information in the statistical release accompanying the household projections. One Welsh Government stakeholder noted that some local interests may nevertheless perceive the figures as reflecting Welsh Government objectives.

##### *Multiple sources of information on household projections*

There is some concern among local planning authorities that competing or multiple sources of household projections can cause confusion. This concern is derived largely from the Welsh Government commissioned report from the Public Policy Institute for Wales on future need and demand for housing in Wales which presents two estimates of future housing requirements for Wales – one based on official household projections and an alternative, higher projection based on a partial return to longer-term trends. A single set of projections would add clarity in the view of these stakeholders. Other stakeholders - including planning consultants and those with some degree of expertise in this area - argued that all sources of data were helpful so long as they made clear and transparent the data that is being used and the assumptions that are being used in producing an alternative or variant projection. It is also noted that the Welsh Government Household Projections

for Wales perform a different role and function from other reports that address housing need and demand by sector.

#### *Using household projections for the purposes of land-use planning*

There is good awareness among stakeholders of the limitations of using household projections in planning for housing and in preparing Local Development Plans. They are particularly aware of the challenge of using *past* trends to plan for *future* development, and that the projections do not account for any policy at national and local level. These factors in themselves suggest some understanding that the household projections cannot be simply taken as 'a requirement' to be planned for in Local Development Plans.

Some stakeholders also noted the other uses of population and household projections beyond the planning system, and that the household projections are not created specifically or exclusively for planning purposes. This again supports the principle that Welsh Government local authority level household projections need to be evaluated carefully when being used to assess housing requirements in the plan-making process.

There appears to be less awareness or use of the variant projections issued alongside the Welsh Government principal household projections, such as those with different assumptions on migration rates. These appear to be particularly valuable for land use planning purposes as varying assumptions about migration can have significant impacts on projected households.

The 2011-based projections are widely acknowledged by stakeholders as being a reflection of a period of recession. However, as a set of projections aligned with the 2011 Census they are recognised by some stakeholders as being more accurate than inter-censal projections in terms of migration data. There are differences of view among stakeholders on whether the 2008-based projections are an appropriate indicator of longer-term trends. Similarly, there are differences of view as to whether there is a 'return to trend' in relation to household formation rates and patterns of migration following emergence from recession.

#### *The role of the household projections in plan review and revision*

The Welsh Government household projections have informed the preparation of the first round of Local Development Plans in Wales. Some of the earlier Local Development Plans to be adopted were also informed by practices for the apportionment of housing requirements between local planning authorities working on a regional basis. The role of the Welsh Government household projections will in many cases now be to inform review and revision of Local Development Plans. Annual Monitoring reports (AMRs) can be used to evaluate the implementation of Local Development Plans. Future releases of Welsh Government household projections may through the process of AMRs trigger a process of plan review. This project focuses on the experience of using Welsh Government household projections to inform Local Development Plan preparation. Additional lessons may emerge in future as local planning authorities review, revise and replace their Local Development Plans.

### **Welsh Government planning policy and the role of the Welsh Government**

#### *The content of Planning Policy Wales*

The content of Planning Policy Wales is considered by most stakeholders to be clear in identifying Welsh Government household projections as a starting point for preparing a Local Development Plans. There is no support for Welsh Government producing an extension of the amount of policy in

this area. Many stakeholders felt that the present policy was sufficient for setting a framework for Local Development Plan preparation at local level. Some minor refinement to Planning Policy Wales was identified as possible. The suggestions for refinement focus on: (1) clarifying that deviations from the Welsh Government projections may comprise projections that refine the projection figures based on local and more recent data, as well as the policy-based projections referred to in Planning Policy Wales; (2) distinguishing between the principal and variant projections and how these may be used to inform land use planning policies; and (3) identifying those issues such as household formation rates and migration data that need particular attention in assessing housing requirements.

#### *Welsh Government clarification of its planning policy on the use of household projections*

The Policy Clarification Letter CL-01-14 on household projections issued in April 2014 is considered by many stakeholders to be useful. The Letter was recognised as necessary to address the actions of some local planning authorities and others who understood the lower figures for projected households to mean providing for fewer dwellings and less land for housing. However, the content of the letter has been understood by some stakeholders - particularly local planning authorities - as implying a change in how Planning Policy Wales and household projections should be interpreted.

There is a view among some local planning authorities that the 2006-based and 2008-based household projections were treated as similar to 'targets' or requirements. The policy clarification letter is therefore understood by some as advising a more cautious use of household projections than previously. The fact remains that a principal household projection is primarily a projection of the trends occurring during the preceding five years. The preceding five years on which the trend is based may be unusual for a range of reasons. Planning Policy Wales could incorporate material that clarifies this point and requires local planning authorities to reflect on whether the trends during that period are (a) consistent with longer-term trends and (b) are likely to continue during the plan period.

#### *Additional 'policies' relevant to use of household projections and identifying housing requirements*

The interviewees also identified some aspects of using household projections in Local Development Plan preparation that can be described as 'unwritten' policy. The foremost example of this is the general understanding or 'rule of thumb' of allowing for a 10 percent contingency when assessing housing requirements. This was identified by several stakeholders across different sectors as an appropriate figure to allow for when, for example, sites do not come forward as envisaged, sites do not deliver the expected number of dwellings or if other factors inhibit the intended delivery of housing. Yet this figure has no basis in planning policy or in other guidance published by Welsh Government. It is appropriate to consider whether this generally accepted figure should be formally incorporated into written policy or guidance, with opportunity to modify the level of contingency based on the plan's approach and local circumstances.

#### *A role for good practice guidance*

Some stakeholders suggest that good practice guidance to support national planning policy would be useful. This could usefully exchange experience on different local planning authorities' approaches after the 'starting point' of the Welsh Government household projections, including: development and refinement of projections to lower, neighbourhood scales or sub-areas within the local planning authority; assessing the appropriateness of assumptions for local areas; and potential ways to explore the relationship between planning policy objectives and household projections, such as in relation to a growth-led planning strategy or one based on urban regeneration goals.

### *The role of the Welsh Government in supporting Local Development Plan preparation*

A series of stakeholders have identified the very positive role played by Welsh Government in supporting local planning authorities in preparing their Local Development Plans, including the provision of local authority level household projections since 2008, training in use of population projections software, and provision of 'critical friend' advice at early stages of plan preparation. The Welsh Government has funded access to software and training for local planning authorities, which has been widely welcomed. The Welsh Government appears to play an early and informal role in supporting local planning authorities in preparation of Local Development Plans, as well as a more formal role in submitting evidence and comments at the examination stage of Local Development Plans.

Some stakeholders in the private sector have identified the role of Welsh Government in reviewing Annual Monitoring Reports (AMRs) as in need of clarification. There is also some concern among these stakeholders about whether Welsh Government is acting on the information identified in AMRs. There is a counter view expressed by one Welsh Government interviewee that the Annual Monitoring Report is a document prepared by a local planning authority on its own plan, and that actions in the light of AMRs need to be determined locally.

### **Local evidence and localised projections**

#### *The availability of data and evidence*

Planning Policy Wales states that local planning authorities 'should consider the appropriateness of the projections for their area, based upon all sources of local evidence'. Evidence and data to support adaptation of Welsh Government household projections is widely available. Stakeholders did not identify any problems arising from a lack of available data or evidence. The free-to-use StatsWales website was highlighted by stakeholders as being of particular value in supporting preparation and examination of Local Development Plans. Stakeholders value the accessibility and transparency of this data. There was nevertheless criticism of some of the 'black boxing'<sup>10</sup> of assumptions made by consultants and local planning authorities in interpreting data and using evidence. This can be interpreted as a request for even greater transparency by all participants in how they have arrived at particular figures or particular conclusions when assessing housing requirements.

Various different data are used in developing household projections, including that on fertility, morbidity, household formation rates and migration. The significance of different components of data for the purposes of calculating housing requirements will vary locally. Nevertheless, some data was held to have significant implications or particular significance for land-use planning purposes. Migration rates and factors affecting average household size are identified as being the key variables or assumptions that can lead to very different housing requirements at local level.

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<sup>10</sup> The term 'black boxing' refers to processes, assumptions and methods of analysis not being transparent to others. The phrase suggests that these activities are contained within a 'black box' that others cannot see inside. This, in the case of household projections and housing requirements, then makes it difficult for people to understand, accept or challenge the figures arrived at.

### *The use of common software and methodologies*

There are advantages in Welsh Government and local planning authorities using the same software packages to develop variant or localised household projections. This can support the delivery of training and avoid detailed discussion about the merits of different software packages. Local planning authorities and Welsh Government have worked collaboratively in developing models. Multiple methodologies and software packages are considered by some stakeholders across different sectors to compound confusion and misunderstanding. The Welsh Government's financial and other support for developing a shared methodology for preparing household projections has therefore been very positive. This is claimed to have reduced the extent of debate at examination on the appropriateness of different models for preparing and adapting household projections. Stakeholders in the planning consultancy sector recommended that it would be useful if the Welsh Government model could also be shared with those representing development interests.

### *Availability of skills and expertise to use household projections data*

The key limitation identified by stakeholders was the availability of skills and expertise within local planning authorities to analyse and interpret the available evidence, as well as to generate variant projections using different assumptions. This is identified as being highly variable between different local planning authorities. The findings here echo those of the National Assembly for Wales when its Environment and Sustainability Committee reviewed the use of household projections in Local Development Plans in 2013. Some local planning authorities did have internal expertise, although at reduced capacity than was the case historically. This in-house expertise is considered to be very useful and provide considerable flexibility in developing alternative, localised projections. One local planning authority was actively trying to develop its in-house expertise because of these perceived advantages.

Some stakeholders anticipated that the introduction of Strategic Development Plans (SDPs), alongside reorganisation of local government, would mean that the deficit of skills and expertise in local planning authorities would become less significant. The limited skills and expertise that is available, they argued, would be aggregated within larger units or could be shared more effectively. There is some basis for this view, although SDPs will not be in place for several years and will not cover all local planning authorities. Some stakeholders also pointed to a decline in relevant expertise in local planning authorities in recent years with experienced staff retiring and not being replaced. Consequently, the deficit in skills and expertise in local planning authorities is unlikely to recede as a problem and may be exacerbated.

### *Use of consultants to provide evidence and expertise*

Some local planning authorities have used planning consultancies or other consultancies to produce housing evidence for LDP preparation where this does not exist in-house. There are considered to be advantages and disadvantages of using either in-house or bought-in expertise. Using consultancy expertise is considered to provide access to people who regularly are engaged in household projections work and therefore remain up-to-date in their expertise, as well as being able to draw on wider experience across various different local planning authorities in England and Wales. However, commissioning work from consultants is considered to be expensive and in some cases the methods and data used may not account for local circumstances. Using consultants was also felt by some stakeholders to leave no real skills and expertise with the local planning authority, which could be a disadvantage when engaging with others during the process of examination. Of particular concern were comments that some local planning authorities do not have sufficient skills in this area of

household projections and related data to be able to properly interpret the work produced for them by consultants.

#### *Linking housing provision and economic growth*

Planning Policy Wales at paragraph 9.2.1 notes that local planning authorities must take into account the needs of the national and local economy when planning the provision of new housing. The relationship between economic growth and housing provision is a key issue in preparing a Local Development Plan. Stakeholders argued that considerable difficulties can arise when these two elements of a local development plan are not aligned or are inconsistent with one another. Some Welsh Government interviewees and planning consultants questioned strategies put forward by local planning authorities that welcomed employment and jobs - and made appropriate land use allocations for these - but did not provide for appropriate levels of housing.

#### *Local politics and household projections*

The adaptation of Welsh Government local authority level household projections by local planning authorities is a task demanding technical expertise. However, local politics also plays a significant role in preparing local development plans and this can create challenges for the plan-making process. This is particularly so when household projections imply a level of housing provision that is considered to be politically unacceptable at the local level. The 2006-based and 2008-based household projections - which projected the trends of the preceding five years - were considered challenging for many local planning authorities in terms of the housing requirements to be delivered locally.

#### *Household projections and uncertainty*

Most stakeholders did not raise any significant concerns about certainty or uncertainty arising from the use of household projections during the plan-making process. There are nevertheless some uncertainties about how an Inspector will conclude on housing figures where various disagreements on this are expressed during the examination. Some uncertainty was noted in relation to the delivery of affordable housing.

### **Examination of Local Development Plans**

#### *Examination and the production of 'sound' plans*

Local planning authorities submit for examination a plan that they consider to meet the various tests of soundness. A key aspect of a plan being sound is that it is based on a robust evidence base. Planning Policy Wales advises on the use of Welsh Government local authority level household projections as a starting point for assessing housing requirements, and these understandably form a key part of the evidence reviewed at examination. Other sources of housing evidence are also used during examination, including past completion rates, site viability and deliverability, and evidence derived from Local Housing Market Assessments<sup>11</sup>.

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<sup>11</sup> Local Housing Market Assessments provide local authorities with an understanding of the nature and level of housing demand and need in their local housing markets. An assessment provides a 'snapshot' of the housing market at a particular point in time, which is projected forwards five years. The Welsh Government issued a Local Housing Market Assessment Guide in 2006 to support local authorities in preparing their assessments. The Welsh Government and the Welsh Local Government Association published 'Getting Started With Your Local Housing Market Assessment – A Step by Step Guide' in 2014 to provide practical guidance to local authorities and to supplement the Welsh Government's guide.

Difficulties are identified as usually arising at examination when the plan and its housing policies are not evidence-based. The absence of evidence to support claims or arguments is usually revealed through the examination process. There is also a focus at examination on assessing the consistency of different elements of the plan and whether these are aligned, particularly for housing and employment.

Some stakeholders, including those in the private sector, questioned whether Planning Inspectors are always sufficiently well-equipped to engage with detailed discussions on household projections that are advanced by some participants in examination sessions. It is recognised by a variety of stakeholders that a plan will raise quite technical issues related to a wide range of topics, and that it is challenging for Inspectors to be expert in all aspects of a plan's content.

The requirement is that a local planning authority submit a sound plan for examination, yet the process of preparing a LDP was identified by stakeholders as one that improves the availability and quality of evidence as the process progresses, including during the examination process itself. Overall, stakeholders generally supported the examination process and considered it to be robust in dealing with household projections and the subsequent assessment of housing requirements.

#### *The weight given to household projections at examination*

There is a consensus that significant weight is given to Welsh Government household projections at examination of Local Development Plans. This is consistent with the projections being identified in Planning Policy Wales as 'a starting point'. Stakeholders argued that examination processes tend not to focus on questioning the household projections themselves. This probably reflects the straightforward premise that the household projections are simply the projection of past trends. Consequently, the household projections are accepted as an accurate statement of what they are and with the limitations that usually apply to them. The focus at examination stage is instead on the assumptions that are made in adapting these to reflect local circumstances.

#### *The challenge of keeping household projections data and evidence up-to-date*

The length of time taken to prepare a local development plan can itself create some difficulties in ensuring that data is up-to-date when the plan is examined. The period for preparing a plan and taking it through examination to adoption is typically several years. Evidence can be collated during initial plan preparation that has become quite dated and superseded by new evidence or data by the time of examination. In addition, it would not be unusual for two or even three sets of Welsh Government local authority level household projections to be released during the period when a plan is under preparation or examination. Some concerns were expressed that local planning authorities were not refreshing data during the plan-making process, resulting in a need to gather further evidence during the process of examination. A small number of local planning authorities have also had to navigate revised Welsh Government household projections at an advanced stage of plan preparation or examination. The need to address revised Welsh Government household projections during examination was considered to be frustrating, but not problematic. The examination process was capable of addressing any changes even at this late stage of plan scrutiny.

### **Monitoring of Local Development Plans**

#### *Annual Monitoring Reports*

Local planning authorities are required to prepare an Annual Monitoring Report (AMR) following adoption of their Local Development Plan. Some local planning authorities with more recently adopted plans have yet to enter into the preparation of AMRs, while local planning authorities which

adopted plans earlier have engaged in several periods of annual reporting. In some cases, the preparation of AMRs has triggered a process of plan review. The relationship of the monitoring process to the topic of Welsh Government household projections is the question of whether the plan is delivering the level of housing provided for in the plan, and whether trends anticipated at the time of plan preparation are occurring. The key issue that private sector stakeholders identified with monitoring is whether local planning authorities and Welsh Government are acting on the data that is identified through the process of preparing Annual Monitoring Reports.

#### *Joint Housing Land Availability Studies*

Several stakeholders also expressed concern for recent figures on housing land supply being produced through Joint Housing Land Availability Studies. Stakeholders identified that many local planning authorities are unable to demonstrate a five year housing land supply, even in cases where a Local Development Plan had been recently adopted. This was felt to risk undermining confidence in the plan-led system. The reasons advanced for many LPAs having significantly less than a five year housing land supply were varied, and included the revised methodology for assessing land availability introduced in January 2015<sup>12</sup>, as well as many adopted plans being ambitious or aspirational in character, with the result that they had in recent years not supported the delivery of housing as anticipated. There is also a growing concern for the viability and deliverability of sites allocated in Local Development Plans. Some stakeholders - particularly local planning authorities - also expressed concern for the capacity of the house-building industry to deliver the level of housing provided for in plans, although others contest this. There is little evidence on this issue.

#### **Stakeholders' recommendations for change**

Interviewees were invited to suggest changes to the system of planning for housing, including the use of household projections, which would lead to an improvement in the system for preparing Local Development Plans. Stakeholders offered few suggestions for significant changes that would improve the processes for developing housing evidence for Local Development Plans. There is from the interviews no overall or clear consensus on the key changes that would lead to an improved system. Stakeholders did nevertheless identify a series of smaller changes that may lead to improvements. The various proposals for change identified by interviewees included:

- minor alterations to Planning Policy Wales, such as making Planning Policy Wales more explicit about the linkage between economic growth and housing provision, or emphasising the most significant variables affecting household projections;
- informing participants about when the latest housing-related data is released;
- the collation and dissemination of good practice between local planning authorities;
- the need for continuing training and skills development in using and adapting household projections;
- promoting greater consistency in the approach to housing evidence between different local planning authorities;
- encouraging local planning authorities to develop various scenarios as part of Local Development Plan preparation, based on varying assumptions about factors influencing housing;
- and using longer-term trend-based data to 'smooth out' cycles of boom and bust, leading to better evidence for forward planning purposes.

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<sup>12</sup> Welsh Government. 2015. Technical Advice Note 1: Joint Housing Land Availability Studies. January 2015.

These recommended changes inform our own recommendations at the end of the report.

### **Conclusions based on stakeholders' perspectives**

The findings based on the initial interviews with stakeholders can be summarised as follows:

- The Welsh Government household projections are considered by stakeholders to be a useful starting point for assessing housing requirements in Local Development Plans;
- There is a good understanding of the characteristics and limitations of household projections data, including for land-use planning purposes. There is understanding that *past* trends are not in themselves a basis for planning for *future* development.
- There has been a gradual refinement of the data and methodology for producing Welsh Government household projections. The development of a shared methodology between Welsh Government and local planning authorities has been useful.
- There is scope for greater use of variant projections issued alongside the principal projections.
- Stakeholders consider Planning Policy Wales to be clear, yet some consider that the Welsh Government's policy clarification letter on the use of household projections for land use planning purposes indicates a change of emphasis on the role that household projections should play in assessing housing requirements.
- Stakeholders express some concerns about the availability of skills and expertise to use and adapt household projections data.
- Welsh Government household projections are given significant weight at examination of Local Development Plans. Examination processes are considered to be robust in exploring household projections data and other housing evidence.

## **4. Local planning authorities' perspectives on the use of household projections in Local Development Plan preparation**

### **Introduction**

This section of the report focuses on local planning authorities' perspectives on the use of household projections in preparing Local Development Plans. A small number of local planning authority officers were included in the initial stakeholder interviews reported in the previous section. Royal Town Planning Institute Cymru wished to provide all local planning authorities in Wales with an opportunity to comment on the use of Welsh Government household projections. Consequently, all local planning authorities in Wales were invited to submit written responses under several headings. Eleven local planning authorities provided comments and two collective responses were received from local planning authorities in north Wales and the three National Park Authorities. The purpose of this section is therefore to capture local planning authorities' perspectives on the use of Welsh Government household projections in preparing Local Development Plans. This is an important perspective as local planning authorities are responsible for developing the evidence base for their Local Development Plan and for submitting for examination a plan that they consider to be sound. The project specification also cited uncertainty among local planning authorities on how much flexibility they have to interpret Welsh Government local authority household projection figures. This perspective is therefore central to the project's objectives.

### **Household projections**

#### *Limitations on the use of the Welsh Government household projections for land-use planning*

Welsh Government household projections are generally considered by local planning authorities to be useful as 'a starting point' in assessing housing requirements. However, this was accompanied by reservations about whether a five year projected trend is an effective basis for forward planning over longer time-frames of 10 to 15 years. It was suggested in responses that principal projections based on trends over longer time frames of 10 years or more are a better basis for land-use planning. One response noted the 10 year migration variant included in the 2011 projections was a useful addition to the Welsh Government household projections.

There is also some concern among local planning authorities about the frequency of the Welsh Government household projections, which aim to be released every two years but are not consistently released at this frequency. The timescale for LDP preparation - which is typically several years - can also mean that revised projections are released during key stages of the plan-making process with implications for needing to revisit either the plan strategy or the detail of its housing policies. Clear schedules for the release of Welsh Government household projections would enable local planning authorities to devise their own schedules for plan preparation around these.

Welsh Government household projections are used for quite different purposes across different public sector functions (education, health, land use planning etc). The preceding points on both the period planned for in an LDP and the timescales for plan preparation highlight how there are some particular characteristics of land use planning that require attention to longer time-frames. The availability of the agreed model and methodology for developing household projections, as well as the availability of historic data, nevertheless enable Welsh Government and local planning authorities to develop alternative household projections that are based on trends over longer time-frames. There is also some acknowledgement that housing data today is both better and more

transparent than it was historically, which supports the possibility of local planning authorities developing alternative projections using longer-term trend data.

#### *Interpreting the changes between the 2008-based and 2011-based household projections*

The significant variation between the 2008-based and 2011-based Welsh Government local authority household projections was the focus of some local planning authorities' comments. The fact that the 2011-based household projections are significantly different to the 2008-based projections may have resulted in a greater appreciation among local planning authorities of the limitations of the projections for planning purposes. The very significant effect on the number of projected households by basing the household projections on a period only three years later has reaffirmed that the Welsh Government local authority household projections are simply a projection of a recent trend.

There is recognition of the effects of the recession on the 2011-based household projections and a concern that basing a plan on the 2011-based projections would mean 'forward planning for decline', which is challenging to accept politically. One response suggested that the five year period preceding 2008 (a period largely of growth) was as exceptional for housing as the five year period preceding 2011 (a period including recession), and that neither set of projections accurately reflects longer-term historical trends. Consequently, this local planning authority's response would challenge both sets of projections based on 2008 and 2011 as a sound basis for forward planning over the longer-term. Nevertheless, the 2011-based household projections are reinforced by the availability of data from the 2011 Census, and therefore avoid some of the data inaccuracies that arise during inter-censal periods.

### **Welsh Government planning policy and role of the Welsh Government**

#### *Interpreting Welsh Government planning policies*

Local planning authorities' responses on planning policy in Wales and the wider role of the Welsh Government in Local Development Plan preparation tended to focus on a few key areas, including: whether the Welsh Government household projections are only a 'starting point' in assessing housing requirements or are portrayed as a target or minimum requirement; whether the 2011-based household projections are being interpreted differently to earlier household projections; and perceptions of the relationship between the Welsh Government and other stakeholders. The responses did not call for any significant change to Welsh Government planning policies on housing and the use of household projections.

#### *Changing perceptions: from household projections as 'targets' to a more flexible approach*

There is some argument by local planning authorities that different parts of Welsh Government have different understandings of what the household projections are and can be used for. It is claimed that the Statistical Division sees household projections for what they are, which is simply the projection forwards of a past trend. Planning Division is claimed by some local planning authorities to portray the projections much more as 'targets' that evidence is required for if they are to be departed or deviated from. In other words, the Welsh Government local authority household projection is seen as more than a 'starting point' and becomes a default figure in the absence of evidence to deviate from this. This is argued as particularly the case for earlier household projections, where Welsh Government is considered by some local planning authorities to have treated the 2008-based projections as if they were 'targets' rather than trend projections, and enforced these as a minimum level of provision that can only be revised upwards.

There is also a view among some local planning authorities that the Welsh Government has changed its stance on the role of Welsh Government local authority household projections as a consequence of the change between the 2008-based and 2011-based projections. The significantly lower 2011-based projections have been interpreted as Welsh Government now emphasising a more flexible approach to interpreting the projections. It appears that the Policy Clarification Letter issued in April 2014 is the basis for forming this view. The Policy Clarification Letter is generally noted as positive by local planning authorities, who in some cases claim that it more strongly reflects the appropriate position of examining all sources of available evidence in assessing housing requirements. The same issue is alluded to in a perceived shift from 'having to justify a deviation from the projections' to now 'having to justify why it is appropriate to use the projections'.

#### *Welsh Government's role in the plan-making process*

Local planning authorities report varied experience of how useful the contribution of the Welsh Government has been in the plan-making process. This is very positive in some cases. In other cases the experience has been problematic. The problematic cases for local planning authorities appear to focus on claims of a lack of consistency in the Welsh Government's advice throughout the plan-making process. It is evident from the responses that relationships of trust between Welsh Government and one local planning authority have been damaged by the experience of working with Welsh Government. This is attributed by the local planning authority to a failure by Welsh Government to raise at pre-deposit stage issues later raised as representations at examination stage. There was also one claim that Welsh Government does not fully recognise the 'political realities' of preparing a Local Development Plan, understood as the local political pressures around the release of land for housing.

Most of the local planning authority responses focused on the often positive working relationships with staff in the Planning Division of Welsh Government. Some of the responses extended beyond this and commented on the wider relationship between Welsh Government, local government and other stakeholders. One respondent distinguished between positive working relationships with Welsh Government at officer level and less constructive relationships at institutional level. Some comments made by local planning authorities focused on the Welsh Government's relationship with housing developers, stating the perception that the relationship between the Welsh Government and the house-building industry was too close, citing Ministerial statements<sup>13</sup> or 'pacts' on delivery of housing and recent changes to TAN1 as the basis for such perceptions.

#### **Local evidence and localised projections**

##### *Using evidence to challenge the household projections*

Some responses suggested that local planning authorities often have tried to reduce the 'target' set by the Welsh Government household projections, but have been unsuccessful in arguing for this. The intention in many cases to reduce the figures below the level indicated by the Welsh Government household projections appears to be politically driven and based on constraints and policy preferences. Consequently, it is sometimes a political or policy decision to produce a figure that deviates from the Welsh Government household projections. However, it was stated in one response that not all deviations from Welsh Government household projections are 'policy-based'

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<sup>13</sup> The Welsh Government in September 2015 signed an agreement with the Home Builders Federation to increase housing supply. The Welsh Government announced that the pact will help to ensure housing supply meets growing demand and will address the Welsh Government priority of increasing housing supply.

projections, as is implicit in Planning Policy Wales, but can be a refinement of the projections locally based on improved or more recent data.

One of the key reasons for local planning authorities deviating from the Welsh Government household projections is that the projections do not factor in any aspects of economic policy or economic change. The economic strategy underpinning a Local Development Plan was recognised by some respondents as an important factor in justifying a deviation from the figure derived from the Welsh Government household projections. Economic strategy and jobs growth are also not factored into the PopGroup software that many local planning authorities use, although one respondent referred to the possibility of developing this into the software in future.

#### *Generating multiple scenarios and localised projections*

Some local planning authorities referred positively to the development of multiple scenarios, including ones with different assumptions about levels of growth, as part of preparing their Local Development Plan. This was felt to help explore alternatives and work towards the most 'realistic' or preferred scenario. However, one local planning authority identified a concern with using multiple scenarios or levels of growth in preparing the Local Development Plan. The local planning authority generated a series of high/medium/low growth scenarios, yet this proved problematic 'when expected to evidence a particular figure' that was supported politically and locally. This can be interpreted as the challenge of integrating evidence and political aspirations, or alternatively as a case where the evidence does not support the strategy that is politically derived. There are occasional references in the responses to difficulties in accessing evidence to substantiate some of the assumptions made in developing a localised projection. Other responses referred to there being no lack of evidence on housing.

#### *Use of shared software and a common methodology*

Many local planning authorities utilise PopGroup software, which is consistent with that used by Welsh Government. It was, however, noted that not all local planning authorities subscribe to the PopGroup software, and that it was costly to do so which may result in some local planning authorities unsubscribing in the future. HouseGroup software was reported as being made available by Welsh Government at no extra cost, yet this does not allow exploration of population projections, and it was claimed that the software has not been reissued following the 2011-based projections and is therefore out of date. It was also identified that using different models - such as the Chelmer model - can result in figures very different to the Welsh Government projections as it has a different methodology and underlying assumptions, including on average household size. Aside from the issues about use of different models for generating and interpreting household projections, local planning authorities identified particular issues with the local modelling of migration data.

#### **Skills and expertise in local planning authorities**

Local planning authorities themselves recognise that in-house skills and expertise are highly variable between different local planning authorities. The significant risk arising from this is that a lack of expertise may result in acceptance of the Welsh Government household projections without sufficient critical interpretation and interrogation of them. In effect, the deficit of skills and expertise in this area means a household projection is accepted as a housing requirement. Local planning authorities recognised that the contracting or buying-in of expertise from consultants is an option, but that this is considered to be expensive. An earlier two-day training session on using household projections organised through the South East Wales Strategic Planning Group was referred to as excellent, although there is a continuing need to deliver training of this kind to local planning

authorities at a time when it is most relevant to each Local Planning Authority's stage of plan preparation.

### **Examination of Local Development Plans**

#### *The weight given to household projections and other housing evidence*

Some of the local planning authority responses suggest that the weight given to Welsh Government household projections at examination is significant, and that the household projections outweigh other sources of evidence. There are also claims that it is difficult to argue locally for an alternative figure to the Welsh Government household projections. Nevertheless, it was noted that various other figures for household projections and housing requirements do come forward as part of the plan preparation and examination process. The examination process was characterised typically as 'the council arguing lower figures and developers arguing higher ones'. The various competing projections being presented at examination by the local planning authority and others, they argued, can result in the Inspector agreeing with the Welsh Government household projections in default 'as a figure somewhere between the higher and lower figures'.

Local planning authorities in some cases argued that insufficient weight is given at examination to past completion rates for housing. They argued that these have often indicated that housing completions in recent years have rarely hit the levels suggested as required by the 2008-based household projections. These local planning authorities suggested that examination processes should place a greater burden on developers to justify their capacity to deliver anticipated levels of development on sites. Some local planning authorities also questioned if Welsh Government is always asked to produce evidence at examination to justify its position, or whether it is simply afforded weight as the 'view' of Welsh Government. These comments together suggest that local planning authorities wish others' evidence and arguments to be given greater scrutiny at examination, equal to that which they feel the local planning authority's claims are subject to.

### **Monitoring and implementation**

#### *Deliverability and viability of housing sites*

There is a concern among some local planning authorities that the sites anticipated as delivering housing during the plan period are not delivering as expected following adoption of the plan. Local planning authorities identified that the viability and deliverability of sites included in adopted Local Development Plans are becoming a more significant concern. It is clear that some local planning authorities' plans face a situation of significantly changed viability of housing sites now compared to the point of plan adoption. This is compounded by reservations among some local planning authorities about the capacity of the house-building industry to deliver the higher levels of housing provided in plans than has been delivered historically.

#### *Joint Housing Land Availability Studies*

A number of local planning authorities raised particular concerns that recent Joint Housing Land Availability Studies report figures of less than five years housing land supply for many local planning authorities. This is attributed to several factors, yet changes to Technical Advice Note 1<sup>14</sup> on assessing housing land availability are considered by many local planning authorities to have contributed to unreliable measures of genuine housing land availability. This is attributed in part to

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<sup>14</sup> Welsh Government. 2015. Technical Advice Note 1: Joint Housing Land Availability Studies. January 2015.

the revised methodology employed in the Welsh Government's technical advice. One response noted a degree of scepticism, arguing that a developer may claim that a site will not come forward within the next five years, given that this claim may result in the need to then deliver more sites through the speculative release of land. This was regarded as a form of 'conflict of interest' on the part of the developer. These various issues mean that some local planning authorities are likely to have to review their Local Development Plans earlier than anticipated. The reasons for a limited housing land supply figure - even where there is a recently adopted plan - are complex and need to be looked at carefully. This research has not focused on the methodology for preparing Joint Housing Land Availability Studies, or on whether local planning authorities are ensuring a five year housing land supply<sup>15</sup>. Nevertheless, these are increasingly important issues that reflect back on the robustness of Local Development Plans and the use of Welsh Government household projections as the 'starting point' for assessing housing requirements.

### **Suggestions for improvement arising from Local Planning Authorities' responses**

Local planning authorities were requested to identify changes to improve how Welsh Government household projections are used in assessing housing requirements in Local Development Plans. The following suggestions were identified by local planning authorities:

- Welsh Government could use longer-term trends as a basis for developing household projections for the purposes of land-use planning, with a preference for periods of 10 years or more rather than the 5 year period that the principal projections are currently based on.
- Welsh Government's 'Knowledge and Analysis' section could usefully issue more analysis alongside the data when releasing revised household projections so as to better inform and assist plan-makers in understanding the changes. This is especially important when the revised projections result in significant change from the previous projections.
- Welsh Government household projections for National Parks should be released at the same time as for local authorities to support Local Development Plan preparation.
- Revise the relevant section of Planning Policy Wales so that it is clearer about the need to focus in analysis more fully on the key areas of migration and household formation rates.
- The Planning Inspectorate should ensure that examination processes scrutinise more fully the capacity of the house-building sector to deliver higher levels of housing.
- The Planning Inspectorate should place greater weight on evidence of past completion rates at examination.
- Training on use of household projections should be available at a point when it is most relevant to the key stages of plan preparation for each local planning authority.

### **Conclusions based on the responses of local planning authorities**

The local planning authorities' responses have echoed some of the issues arising from the interviews with the wider range of stakeholders. However, they have also added a more critical perspective on some aspects of the use of Welsh Government household projections in the Local Development Plan process. These critical points will be explored further in the next section of the report which is based on three case studies of Local Development Plans in Wales. Nevertheless, the following preliminary findings are based on the local planning authorities' written responses:

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<sup>15</sup> Section 9.2.3 of Planning Policy Wales, Edition 7, July 2014.

- Local planning authorities generally accept that the Welsh Government local authority household projections are a useful starting point for assessing housing requirements, but express reservations about the use of a five year trend as a basis for effective forward planning over a 10-15 year timescale;
- The significant change in numbers of projected households between the 2008-based and 2011-based household projections has changed the way that local planning authorities understand and interpret the household projections. Local planning authorities have a more nuanced perspective than some other stakeholders on whether there is a post-recession reversion to trends indicated in earlier household projections.
- Some local planning authorities do argue that Welsh Government portrayed the 2008-based and earlier household projection as 'targets' or minimum requirements, and that these were to be accepted in the absence of evidence to justify deviating from them. These local planning authorities have also interpreted the Welsh Government's Policy Clarification Letter in 2014 as indicating a change of position by the Welsh Government in which the household projections form a less significant part than previously in assessing housing requirements.
- Local planning authorities generally comment positively on the role of Welsh Government's Planning Division in the process of preparing Local Development Plans, although there are some exceptions to this. Local planning authorities noted some concerns about the wider role of Welsh Government and its relationship to stakeholders in the house-building industry.
- Local planning authorities recognise that the skills and expertise on using household projections are variable between different authorities. Training and skills development has been welcomed by local planning authorities, yet there is a recognised need to ensure that training and skills development opportunities continue to be available.
- Local planning authorities argue that the Welsh Government household projections play a significant role at examination of Local Development Plans, but that these need to be complemented by greater weight being placed on other forms of data such as past completions of dwellings. They also identify the capacity of the house-building industry to deliver higher levels of development as an area that requires greater scrutiny at examination.
- Local planning authorities express significant concern about what they regard as some of the perverse outcomes of revisions to the methodology for calculating housing land availability introduced in January 2015.

## 5. Case studies of Local Development Plans in Wales

### Introduction

This section of the report focuses on the use of Welsh Government household projections in Local Development Plans through cases studies of Carmarthenshire, Denbighshire and Newport. The purpose of the case studies is to explore key themes introduced earlier in the report in greater detail. The case studies are also a useful way of verifying some of the claims made by different stakeholders, as well as exploring where there are differences of perspective.

The particular case studies were selected based on the need to address several different criteria, including: a range of urban and rural contexts; the use of in-house or consultancy expertise; and the effects of the different Welsh Government household projections, including where the 2011-based projections indicate significant change compared to the 2008-based projections. The selection was based on recent adoption of Local Development Plans, with some of the case study authorities engaged in production of Annual Monitoring Reports.

The case studies were developed using the examination library and publicly available documents for each local development plan. The case studies for Carmarthenshire and Denbighshire are also informed by an interview with the respective Local Development Plan team leader. A summary of each case is outlined before some general lessons from the case studies are identified.

### Carmarthenshire

#### *Introduction and context*

Carmarthenshire County Council adopted its Local Development Plan in December 2014. The plan was adopted around 7 months after the end of the hearing sessions, and just over a year after it was submitted for examination. The plan was initially developed in the context of the 2006-based Welsh Government household projections which projected an increase in the number of households of just over 35% by 2031. The projections also assumed a decreasing average household size over the period to 2031. The 2008-based household projections were published prior to consultation on the Local Development Plan. These were reviewed by the Council but not utilised as the basis for the plan at this stage as they were only marginally lower than the 2006-based Welsh Government projections.

#### *Developing alternative projections and scenarios*

The Council decided that the assumptions underpinning the Welsh Government local authority level household projections did not properly reflect the urban-rural mix of the County. The Council also considered the migration data used in the Welsh Government projections did not reflect local circumstances. The Council therefore contracted consultants to assess the assumptions underpinning the Welsh Government projections and develop revised projections based on six community areas. The Council did have internal expertise to carry out household projections work, and used consultants principally because of capacity issues rather than skills deficits.

A series of five 'net-migration' scenarios were developed using PopGroup software based on data for demographic changes in the past six years. One scenario derived assumptions on future migration from data that reflected periods of both very high and very low net migration experienced during the past decade. This scenario produced a substantially lower figure for the increase in households over the plan period than identified in the 2006-based and 2008-based Welsh Government projection. The Home Builders Federation expressed concerns with the lower figures, arguing that

the Council had relied only on its commissioned report for assessing its housing requirement, as well as the impacts that a lower housing requirement figure would have on delivery of affordable housing.

Welsh Government noted that the Local Development Plan provided for a lower figure than identified in the Welsh Government projections, yet agreed that the consultancy report provided evidence and analysis that justified a lower housing figure based partly on a decline in migration into the County. Welsh Government's key concerns were (1) with the household to dwelling conversion rate used by the Council, which fell below the rate preferred by the Welsh Government, and (2) that the consultants' report did not account for a suitable vacancy rate in determining housing requirements.

The examination process also explored concerns in relation to the ability to deliver higher levels of housing than previously. Past completion rates identified in Joint Housing Land Availability Studies illustrated a highest completion rate of 807 units per annum, while the chosen scenario required 1,013 homes to be completed per annum. The figure of 1,013 completions per annum was lower than the figure of 1,190 units per annum required to meet the Welsh Government household projection. This, alongside concerns arising from the economic downturn, generated concerns about whether the housing requirement was realistic and deliverable.

A contingency figure is usually included in a Local Development Plan's housing requirement to anticipate the possibility that sites may not come forward for housing development, or other factors that may result in less units being developed than provided for in a plan. This is designed to ensure a degree of flexibility is built into the plan. The contingency level at deposit stage was 8% and was reduced to 7% at examination stage to reflect changes made to the plan. Welsh Government noted its preference for a 10% contingency level, but was comfortable with an 8% contingency. Welsh Government expressed some concerns with a 7% contingency figure, but thought it was not unreasonable if historic evidence could be produced to support this.

#### *Responding to release of new household projections data*

The 2011-based Welsh Government household projections were released in early 2014 during the examination period. The projections showed a significant decline in projected households for Carmarthenshire compared to earlier projections. Carmarthenshire County Council had to reflect on the change in projected households, but determined that there was sufficient evidence to continue with a growth-based strategy. The Welsh Government's Policy Clarification Letter of 2014 was interpreted by the Council as confirmation that its growth-led housing strategy was an appropriate one. The extent of employment land allocated in the plan was reduced in response to Welsh Government concerns on over-allocation. This prompted discussion on whether the provision of land for housing should also be reduced, although the Council again decided that there was sufficient evidence to maintain its planned level of housing provision. The Planning Inspectorate found the plan to be sound, noting that the 2011-based Welsh Government household projections had been considered but that a deviation upwards from these figures had been justified by local evidence.

#### *Key issues identified from the Carmarthenshire Local Development Plan*

The case study highlights the following key issues:

- The Welsh Government household projections are important in assessing housing requirements. Challenging the Welsh Government projections requires that robust evidence is produced to support alternative projections.

- Migration data was identified as being particularly variable and this supported the questioning of some of the assumptions underpinning the Welsh Government household projections and their application to local circumstances.
- The use of consultants can be a useful way of enhancing capacity in this area even when there is some internal expertise within the local authority. The availability of internal expertise allowed for appropriate interpretation of the consultants' work. The use of PopGroup as an established software package was also useful here.
- The use of scenarios was helpful in allowing participants to engage in a discussion to reach a balanced view on housing growth.
- The provision of land for housing and land for employment need to be explored in a connected way, given the importance of the relationship between housing and employment.

## **Denbighshire**

### *Introduction and context*

Denbighshire County Council submitted its plan for examination in August 2011 and hearing sessions were held in January 2012. An exploratory meeting followed in February 2012 which resulted in a consultation on additional evidence. Further hearing sessions were held in May 2012. The plan was adopted by the Council in June 2013.

### *Identifying the dwelling requirement*

The early stages of plan preparation were undertaken in the context of the 2006-based Welsh Government household projections. The 2008-based projections were released prior to submission of the Local Development Plan for examination and the plan was evaluated against the figures in these projections. The Council's projection of additional households over the plan period was, however, largely derived from an apportionment exercise undertaken collectively by local planning authorities in north Wales in 2009. This led the Council to propose a figure of 7500 dwellings over the plan period based on 500 units per annum. The Council acknowledged that this provision was below that identified in the 2008-based Welsh Government household projections, which identified 8400 new households over a period broadly aligned with the plan period. The figure of 7500 is also below that identified in the 2006-based projections. The Home Builders Federation criticised the Council for using figures derived from the earlier apportionment exercise over the latest household projections. Welsh Government acknowledged that the Local Development Plan included a lower housing requirement than indicated by the Welsh Government projections, but stated that the scale of under-provision did not have implications for the overall strategy of the Local Development Plan and did not affect it being a sound plan. Welsh Government anticipated that further sites may come forward during the examination process, yet also cautioned against any further deviation from the 2008-based household projections.

### *Reasons for deviating from the Welsh Government household projections: environmental capacity and house-building capacity*

The Council's reasons for deviating from the Welsh Government household projections were given as environmental capacity and the capacity of the local construction industry. The Council was also concerned by the average requirement for 500 units per annum in its plan, given that annual completions data over the preceding decade ranged from 201-387 units and averaged 267 units per annum. The Council is noted during earlier stages of the examination as accepting the 2008-based Welsh Government projections as a reasonable account of housing requirements, but argued that

capacity constraints meant this could not be delivered. The examination process revealed that the reasons given for deviating from the Welsh Government projections were not based on evidence. The Inspector also identified inconsistencies in the Council's arguments. For example, the Council had assumed increased construction capacity in the later stages of the plan period, and had also during later stages of the examination acknowledged that additional sites without environmental constraints could be brought forward for inclusion in the plan. The Inspector concluded that the Council's original reasons for deviating from the Welsh Government household projections were not based on evidence.

The Inspector issued preliminary findings in February 2012 and concluded that the Local Development Plan did not make sufficient provision for housing. The Council had relied in part on a commissioned consultancy report on household projections from 2005, which the Inspector noted as being superseded by more recent evidence, including the Welsh Government household projections. The level of contingency allowed for in the plan was 4%, which was noted by Welsh Government as significantly below the usual figure applied by local planning authorities of around 10%. The Inspectors also criticised the limited allowance for contingency in their preliminary findings.

#### *Change of strategy: challenging the household projections data*

The examination process led to a wide range of alternative dwelling requirement figures over the plan period. The Home Builders Federation argued for meeting the 2008-based Welsh Government household projection figure of 8,400 households in full, plus an additional 10% allowance for contingency. Other participants in the examination argued that a dwelling requirement of 10,000 was required if the plan's housing provision was to align with its economic strategy. The Inspector in preliminary findings concluded that the Local Development Plan should provide for 8400-8586 units plus a level of contingency. The Council was presented with two options: (1) provide more evidence to justify not meeting the figure identified in Welsh Government household projections; or (2) allocate sites to meet the shortfall below the Welsh Government household projections.

The Council at this stage took several actions to respond to the Inspector's concerns, but also adopted a different strategy to justifying its dwelling requirement. The Council, rather than relying on claims of lack of environmental or construction industry capacity, started to interrogate the assumptions underpinning the Welsh Government 2008-based household projections and their application to local circumstances. The Council commissioned work from Conwy County Borough Council which used more recent data on births, deaths, fertility and mortality, as well as a 9-10 year migration rate to develop its own, refined 2010-based projections. This evidence allowed the Council to argue for a requirement of 5750-6800 units depending on assumptions about migration rates. This evidence appears to have been pivotal in the Inspector accepting a dwelling requirement that deviates from the Welsh Government household projections, although not by as substantial a margin as argued in the Local Planning Authority's updated evidence. The originally proposed dwelling requirement of 7500 units over the plan period - which gave rise to concern during the examination process - therefore remained intact on adoption, although for very different reasons than were argued at the opening of the examination.

## *Key issues identified from the Denbighshire Local Development Plan*

The case study highlights the following key issues:

- The need for local planning authorities to address the latest Welsh Government local authority household projections in preparing their Local Development Plan, and ensure that evidence is kept up-to-date as the plan-making process progresses.
- There is flexibility for local planning authorities to deviate from the Welsh Government household projections, but only where there is robust evidence to support this. For example, arguments about restricted environmental capacity and the capacity of the house-building industry were found to be without evidence in this case. The evidence commissioned at a late stage of plan preparation to prepare a refinement and updating of the Welsh Government household projections was pivotal in this case, and provided a stronger basis for deviating from the Welsh Government projections. This also underlines the importance of access to skills and expertise.
- The additional households projected during the plan period and the dwelling requirement based on this can vary considerably depending on the various assumptions made. The alternative figures presented by different organisations during the examination of Denbighshire's Local Development Plan range from 5,750 to 10,000 dwellings.

## **Newport**

### *Introduction and context*

Newport County Council initially deposited its plan in April 2012 but decided that a revised deposit plan was required based on representations to the original deposit plan, particularly in relation to Gypsy and Traveller site allocations. These representations also included those related to the need for additional evidence on housing need, population change and employment land. A revised plan was deposited in December 2013 and hearing sessions took place in two phases during April-May 2014 and September-October 2014. The plan was adopted in January 2015 following receipt of the Inspector's report in December 2014.

### *Clarifying the methodologies used to prepare earlier versions of the plan*

The initial version of the plan deposited by the Council combined a series of different trends captured in the 2006-based and 2008-based household projections, and proposed a phasing of housing provision to reflect these trends. Welsh Government expressed its concerns to the Council about the mismatch of methodologies used in preparing the initial deposit plan which were not supported by robust evidence. The first deposit version of the plan also did not provide sufficient justification for why the Welsh Government household projections were appropriate locally for planning purposes. The Council subsequently commissioned planning consultants to explore the implications of using the 2008-based Welsh Government household projections. This work also identified a misalignment between the housing figures proposed and the employment growth forecasts underpinning the economic strategy of the plan. The consultants' report developed a series of policy scenarios and explored the impact of these on household projections. This resulted in selection of an economic growth-led scenario that aligned with a revised household projection figure.

### *Aligning the housing requirement with the economic growth strategy*

The plan was developed in the context of the 2008-based Welsh Government household projections which identified a figure of 7,136 new households between 2011 and 2026. The 2011-based Welsh Government household projections were released during the first round of hearing sessions into the plan. Newport is one of only two local planning authorities in Wales where the later 2011-based Welsh Government household projections identified an increase over the 2008-based projections. The 2011-based projections increased the figure from 7,136 households to 7,987 households. The revised deposit plan was based on an economic growth scenario of 10,350 new households during the plan period, as outlined above. The Council was concerned that basing housing requirements on the 2008-based or 2011-based Welsh Government household projections would not align with the economic growth anticipated by the plan and would lead to an increase in commuting. The fact that the 2011-based Welsh Government household projections reflected a period of recession was used by the Council to support continuation with its original figure aligned with its economic strategy. The Inspector supported the higher, economic-growth led housing figure as it also aligned with affordable housing and infrastructure provision expected in the plan.

### *Changing from Unitary Development Plans to Local Development Plans*

Some representations on the plan argued that the housing requirement figure in the Local Development Plan should be increased further to make up for a shortfall in delivery by the earlier Unitary Development Plan. This argument was not supported by the Inspector who pointed to different approaches to identifying housing requirements between the former UDP system and the present Local Development Plans system. This argument was also dismissed in discussions on the level of contingency allowed for in the plan, where the Local Development Plan allowed for a figure of 12%. This figure was accepted based on it being a suitable figure given the sites allocated in the plan and it being comparable to the figure used by other local planning authorities.

### *A sound plan*

The Inspector's report in December 2014 found the revised deposit plan submitted for examination to be sound and supported the economic growth-led strategy. Welsh Government also supported the Council's approach. The Inspector required that some housing sites be removed from the plan due to flood risk or other constraints on delivery, to be replaced with other sites. There was also a requirement to adjust affordable housing contributions to better reflect local housing market evidence on development viability. The Inspector also required that a better-defined monitoring framework be provided to ensure that housing delivery remained aligned with economic growth. The plan was adopted in January 2015. The plan was adopted in January 2015 and the economic growth strategy underpinning the plan is currently on track to deliver the highest number of annual housing completions in 2015-16 for over 25 years.

### *Key issues identified from the Newport Local Development Plan*

The case study highlights the following key issues:

- The need for clarity of methodology when utilising household projections data from different base years;
- The importance of aligning the housing strategy and economic strategy in the Local Development Plan, as well as ensuring that economic growth is closely related to housing provision;

- The value of developing a series of policy-based scenarios and linking these with local, variant household projections;
- The importance of exploring the economic and social characteristics of the period from which the trends in the Welsh Government household projections are derived and subsequently projected;
- The capacity for a local planning authority to adopt an ambitious economic strategy when this is allied to appropriate provision of land for housing.

### **Key themes arising from the case studies**

Each case study has identified a set of key issues or lessons. This final section identifies the wider lessons arising from the three case studies:

- The case studies identify that there is flexibility to deviate from the Welsh Government household projections based on refinement of data at local level and/or the development of policy-based projections.
- The case studies underline the significance of robust and up-to-date evidence in supporting a deviation from the Welsh Government household projections and delivering a sound plan. There is some evidence that the Welsh Government household projection for a local authority area becomes a default figure in the absence of evidence to justify a deviation from it.
- Access to suitable expertise and skills played a key part in each case study, particularly in justifying a deviation from the Welsh Government household projection figure.
- The range of figures put forward by different stakeholders for dwelling requirements over the plan period can be considerable, depending on the different assumptions made.
- Examination processes are particularly effective at identifying inconsistencies in arguments and evidence presented during examination of Local Development Plans.

## 6. Conclusions and recommendations

### Introduction

The earlier sections of this report have provided detailed information and evidence on the role of household projections in preparing Local Development Plans. This concluding section outlines the main findings based on this evidence, identifies a series of recommendations, and outlines some areas for further research.

### Key findings of the research

The key findings of the research are organised into the following thematic headings:

#### *Household projections*

- The Welsh Government local authority household projections are a valuable mechanism for assessing housing requirements in Local Development Plans. They should be retained as a 'starting point' in assessment housing requirements.
- Stakeholders understand the nature of household projections as the projection of recent trends. The limitations of the household projections, particularly for the purposes of land use planning over the medium-term, are well recognised. There does, however, appear to be less use of the variant projections issued alongside the principal projections.
- Significant improvements have been gradually made over time in establishing a common methodology and transparent framework for interpreting population and household projections. The data needed to interpret and adapt projections is generally of good quality and is openly accessible.
- There is evidence that local planning authorities do have the ability to deviate from Welsh Government household projections, so long as local planning authorities provide robust evidence to justify their position.

#### *The Welsh Government's role and planning policies*

- The work of the Welsh Government to support local planning authorities in interpreting household projections and preparing their local development plans is generally welcomed and recognised by local planning authorities and other stakeholders.
- Planning Policy Wales provides a clear statement on the role of Welsh Government household projections in preparing local development plans. Some minor amendments to Planning Policy Wales may enhance the clarity of the policy, yet it is generally fit for purpose. There is no support for an extension of planning policy in this area.
- The Policy Clarification Letter issued by Welsh Government in 2014 has been interpreted by some stakeholders, particularly local planning authorities, as a change in Welsh Government's position on the use of household projections.

#### *Local data and refinement of household projections*

- The establishment of a common or shared methodology and software between Welsh Government and local planning authorities provides a platform for local planning authorities to prepare local variant projections using refined data and by varying assumptions.

- Data availability is good, easy to access, and is open and transparent. There is no shortage of local data to support the use, interpretation and refinement of household projections.
- Some of the data used in producing household projections is very stable. Other data is less stable or reliable and can have significant implications for assessing housing requirements in local development plans. Migration data is a key example of data that can change housing requirements significantly.
- Local politics plays an important part in preparing a local development plan, and particularly in assessing housing requirements and identifying sufficient land for housing. There is scope in the plan-making process to determine local, political priorities, yet these also need to be clearly supported by evidence.
- The skills, expertise and capacity to interpret and adapt the Welsh Government household projections - whether this be in-house or consultancy expertise - is an important factor in developing a sound Local Development Plan.

#### *Examination of Local Development Plans*

- The Welsh Government household projections play an important part at plan examination. The projections are given considerable weight in examining Local Development Plans.
- Various different dwelling requirement figures are presented by various stakeholders during examination of local development plans. These can vary considerably depending on the assumptions that are made.
- Examination processes are robust in terms of assessing the use of household projections and other forms of data. These processes allow for an evidence-based approach to identifying housing requirements. The processes are also effective at identifying inconsistencies in the arguments and evidence presented during examination.
- The challenge for local planning authorities is to ensure that the evidence base on population and household change is kept up-to-date as the plan-making and examination process continues, including responding to additional release of Welsh Government household projections.

#### *Skills, expertise and training*

- There is considerable support for the identification of good practice and preparation of practice guidance in this area to support local planning authorities.
- Local planning authorities vary considerably in their skills and expertise in using and adapting populations and household projections. The availability of these skills in local planning authorities is likely to decline further. The sharing of skills and expertise between local planning authorities is valuable.
- Planning consultants provide an additional source of expertise and advice that can play a valuable role in assessing and preparing household projections as part the preparation of Local Development Plans. This is particularly the case for aligning housing requirements with the economic strategy of a Local Development Plan.

## Recommendations

*1. The Royal Town Planning Institute, Welsh Government and other stakeholders should work together to deliver further training and skills development opportunities on interpreting, adapting and refining household projections data for land use planning purposes.*

There are various areas of the land use planning system where there is pressure to develop better skills and expertise. The ability to develop robust housing evidence, including through the capacity to adapt household projections data, is a key area where skills and expertise needs arise. The significance of assessing housing requirements to the preparation of a Local Development Plan suggests that this should be a priority for development of skills and expertise.

*2. Welsh Government should make some minor amendments to Planning Policy Wales to clarify some aspects of its policy and how it should be interpreted.*

The amendments to Planning Policy Wales should: highlight the scope for refining the Welsh Government household projections as well as developing policy-based projections; encourage greater use of the Welsh Government variant projections as well as the principal projections; emphasising that Welsh Government household projections reflect the trends of the preceding five years, and encourage local planning authorities to explore how these trends relate to longer-term trends and whether the shorter-term trend is likely to continue during the plan period.

*3. The Royal Town Planning Institute, Welsh Government and other stakeholders should develop a good practice guide on the use of household projections in preparing local development plans.*

The research has identified several areas where this practice guidance could make a valuable contribution, as well as help to reinforce Planning Policy Wales:

- explaining clearly for all stakeholders and users the way that household projections are prepared and how these can be used to inform land-use planning;
- promoting greater use of the variant projections alongside the principal projections in the Welsh Government households projections;
- using data to refine, improve and update the Welsh Government household projections;
- promoting the development of multiple, alternative policy-based scenarios and projections;
- advising on the 'shelf-life' of population and housing data during the process for preparing a Local Development Plan;
- emphasising the particular significance of household formation rates and migration data to the assessment of housing requirements;
- outlining mechanisms for exploring whether established trends are likely to continue as projected;
- providing guidance on the appropriate level of contingency to allow for in setting a housing land requirement, and the factors that may support the use of higher and lower levels of contingency.

The role of the practice guidance could be fulfilled by a document in the Welsh Government's Technical Advice Notes series or developed collaboratively by a range of stakeholders. The practice guidance could be prepared in an accessible and easy-to-use format for a range of different stakeholders. There is in any case some value in the Welsh Government endorsing the practice guidance to support its use in local development plan preparation.

*4. Welsh Government should explore the practicality of preparing a set of Welsh Government local authority level household projections specifically for the purposes of land use planning that utilise longer-term trend data on which to base the projected figures. This should include the possibility of developing household projections for National Park Authorities.*

This recommendation recognises that Welsh Government household projections are used for a variety of different purposes and activities, and that land-use planning has some distinctive qualities that are not addressed through use of shorter-term trend projections. The 10 year migration trend is one example that has been incorporated into the Welsh Government household projections, and the recommendation requests that an extension of this practice be explored.

#### **Further research**

This research has focused on the use of Welsh Government household projections in preparing Local Development Plans. Several related issues have been identified during the research that are not within the scope of the project but have important implications for a plan-led system of housing provision. The areas that would benefit from further research are:

- The effects of the revised methodology for calculating housing land supply introduced in January 2015 with the revision of Technical Advice Note 1: Joint Housing Land Availability Studies; and
- The deliverability and viability of sites included in adopted Local Development Plans and the impacts of these on the supply of housing. This could compare the information provided on site deliverability and viability at examination stage with the deliverability and viability of sites post-adoption.

Stakeholders argued that these issues were ones that risked undermining the credibility of a plan-led system and should therefore be addressed as matters of importance.

## Appendix: notes on participants in the research project

The research project was managed for RTPI Cymru by Rhian Brimble.

The project team at Cardiff University comprised Neil Harris, Brian Webb and Bob Smith.

Participants in the stakeholder interviews were:

- Simon Coop, Nathaniel Lichfield and Partners
- Mark Harris, Home Builders Federation Wales
- Neil Hemington, Welsh Government
- Alan Jackson, Welsh Government
- Rhian Kyte, Caerphilly County Borough Council
- Mark Newey, Welsh Government
- Steve Palmer, Welsh Government
- Stuart Ropke, Community Housing Cymru
- Paul Selby, The Planning Inspectorate
- Ben Stephenson, Barton Willmore
- Terry Stevens, independent planning consultant

Additional organisations were also invited to provide an interview but did not participate in the project.

The local planning authorities that responded individually to the call for written responses were:

- Blaenau Gwent County Borough Council
- Bridgend County Borough Council
- Caerphilly County Borough Council
- Ceredigion County Council
- Denbighshire County Council
- Merthyr Tydfil County Borough Council
- Monmouthshire County Council
- Pembrokeshire County Council
- City and County of Swansea
- Vale of Glamorgan County Borough Council
- Wrexham County Borough Council

Collective responses were also received from:

- The three National Park Authorities
- Local planning authorities in North Wales comprising Wrexham County Borough Council, Gwynedd County Council, Denbighshire County Council, Conwy County Borough Council, Flintshire County Council, and Snowdonia National Park Authority

Interviews to support the local planning authority case studies included:

- Angela Loftus, Denbighshire County Council
- Ian Llewelyn, Carmarthenshire County Council



Participants at the focus group included:

- Mark Harris, Home Builders Federation Wales
- Neil Hemington, Welsh Government
- Sue Jones, Bridgend County Borough Council
- David Rees, City and County of Swansea
- Paul Selby, The Planning Inspectorate
- Ben Stephenson, Barton Willmore

The research was completed in accordance with the ethical approval processes of Cardiff University.



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## About the research

This report is based on research conducted for RTPI Cymru by Neil Harris, Bob Smith and Brian Webb at Cardiff University School of Planning and Geography.

## Further information

The report is available on the RTPI website at: <http://www.rtpi.org.uk/the-rtpi-near-you/rtpi-cymru/policy-in-wales/wales-planning-research-agenda/process-for-developing-housing-evidence-for-ldps/>

## About the RTPI

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Information on RTPI Cymru's research projects can be found at: <http://www.rtpi.org.uk/the-rtpi-near-you/rtpi-cymru/policy-in-wales/wales-planning-research-agenda/>

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