~ ~ -	n to existing cottage. Site access relocation. ng area – Spindle Cottage, Upper Mitchell,	5	No Objection	Approved with conditions
1 (0 0	Storage building (retrospective) – Ornua Ingredients UK Ltd, Hazel Park, Dymock Road, Ledbury, Herefordshire, HR8 2JQ	rs	No Objection	Approved with conditions
	I TC MEETING 12 November 2020			
111 -	Proposed extension of existing service staircase enclosure to enable installation of new lift at Netherhall, Church Street, Ledbury, HR8 1DJ	R	No Objection	No Decision
111	Proposed single storey dwelling house at Land at The Orchard, South		No Objection	Approved with conditions
	Proposed replacement of metal framed windows and uPVC front door to street facade only with painted timber casement windows at - Mistletoe Cottage, 73 The Homend, Ledbury, Herefordshire, HR8	N	No Objection	No Decision
L	Proposed detached 3-bedroom agricultural workers dwelling at - Land adjacent The New House, Old Kennels Farm, Bromyard Road, Lodhing Herefordshire HR8 11 G	3	No Objection	No Decision
dillulus sub-	Proposed ground floor extension at 1 Ledbury Park, Ledbury, Herefordshire, HR8 1LF	MN	No Objection	No Decision
	New single storey extension and various external alterations including nevised openings. Partial conversion of existing garage. Change existing shingles to timber cladding. Replace all existing doors and windows. External works to suit revised layout at 2 Larkrise, Knapp and Labius Herefordshire. HR8 1AN	N	No Objection	No Decision
T	Proposed conversion of existing garage into a home-office, new roof and windows at - Cropthorne House, Belle Orchard, Ledbury, Herefordshire, HR8 10D	MN	No Objection	No Decision
THE RESERVE TO STATE OF THE PARTY OF THE PAR	Full application for the approval of the 2 nd phase for the erection of 46 dwellings at Land to the South of Leadon Way	CB	That this item be deferred to the next meeting of Major Planning Applications	No Decision

			Working Party, with the outcome of the meeting	
LTC MEET!	LTC MEETING 10 December 2020		pering reported pack.	
202679	Change of use of upper two floors of property from officers to 2 no self-contained apartments — 15 The Homend, Ledbury, Herefordshire, HR8 1BN	g B	Objection	No Decision
202680		AB	Objection	No Decision
203822		N	No Objection	No Decision
203823	external ave due the wall 22 The uilding	N	No Objection	No Decision
203921		MN	No Objection	No Decisions
203847	Ground floor extension to provide accessible kitchen facilities – 126 Biddulph Way, Ledbury, HR8 2XL	MN	No Objection	No Decision

ECONOMIC	
DEVELOPMENT &	
PLANNING COMMITT	EE

14 JANUARY 2021

AGENDA ITEM: 17

Report prepared by Angie Price - Town Clerk

REQUEST TO CULTIVATE FULL PITCHER ROUNDABOUT

Purpose of Report

The purpose of this report is to provide Members of the Economic Development & Planning Committee with confirmation received from Balfour Beatty in respect of the Cultivation Licence for the cultivation of the Full Pitcher Roundabout on the A417, Ledbury bypass.

Detailed Information

A request had been received from "Hands-on-Cleaning" in respect of the cultivation of the roundabout situated at the Full Pitcher on the A417 Ledbury Bypass.

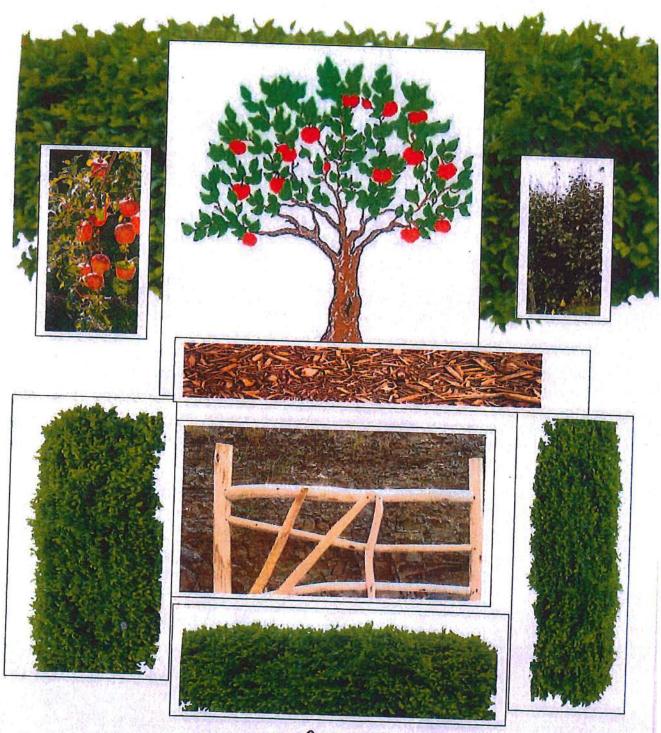
Subsequently a request was made to Balfour Beatty in relation to this request and attached is confirmation of the issuing of the Licence to Cultivate.

Also attached is a rough sketch of the proposed plants to be placed on the roundabout, a more detailed plan has been requested and it is anticipated that this will be available prior to the meeting.

The proposal is that the trees to be planted will be apple and pear trees and that when fully grown they will not exceed 4 feet in height. The hedges are to be maintained at a height of 2.5 feet using box trees.

Recommendation

Members of the Economic Development & Planning Committee are requested to give consideration to the attached information and decide whether they wish to grant the Licence to Cultivate the Full Pitcher roundabout on the A417, Ledbury Bypass to Hands-on-Cleaning as per their request, subject to a further more detailed plan being available for consideration.



Measurements: Treas 4ft when fully grown
Hedges to be Haintained at a height of
21/2 feat (Box trees). Futher plan tollow





Working for Herefordshire

Thorn Depot Unit 3, Thom Business Park Rotherwas, Hereford Herefordshire HR2 6JT

Ms N Young
Deputy Town Clerk
Ledbury Town Council
Town Council Offices
Church Street
LEDBURY
HR8 1DH

22 December 2020

Our reference: FLM/Licence No 1123

Dear Nicola

CULTIVATION LICENCE NUMBER 1123 SITE: FULL PITCHER ROUNDABOUT, LEDBURY

I enclose the formal documentation with respect to the above Cultivation Licence for the cultivation of the Full Pitcher Roundabout on the A417, Ledbury bypass.

I also enclose copies of the current utility plans for your records, as at November 2020. Please note that there are services under the roundabout. Also, there will be cables serving the illumination over the signs on the roundabout. These are not shown on Western Power's plan as they will be service cables rather than main supply cables. However, they may still need to be located.

If you have any queries, please let me know.

Yours sincerely

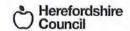
Fiona Miles

Licencing & Enforcement Officer

E-mail: Fiona.miles@BBLivingplaces.com

Tel: 01432 349546





Working for Herefordshire

HIGHWAYS ACT 1980

SECTION 96 - CONSENT - LICENCE NO 1123

The Herefordshire Council, as Highway Authority for the highway maintained, do hereby give Consent to the Ledbury Town Council to plant and maintain shrubs, plants, bulbs and grass in the highway verge at the following locations: Full Pitcher Roundabout, A417/A449, Ledbury.

The planting of the roundabout should cause no inconvenience, but the following notes and conditions should be observed by the Town Council.

- The shrubs, plants, bulbs and grass shall be planted/maintained on land forming part of the highway in positions, which will not cause obstruction or interference to any existing access, or to visibility on the highway.
- The planting scheme cannot be substantially changed without prior agreement from the highway authority in order to protect the visibility and underground utility services.
- 3. The Town Council shall stop cultivation and restore the roundabout to its previous condition including reinstating the turf in a level manner at any time at its own expense if it should become necessary to do so, on receiving 21 days notice from the Herefordshire Council to remove the shrubs and plants.
- The Highway Authority may remove any obstruction or hazard caused by, or on the verge, or adjacent to it, by reason of the planting, at the expense of the Town Council.
- The Town Council may be required to obtain the permission of the adjoining landowner who may be the owner of the subsoil and in order that he will be able to maintain his highway boundary fences.
- The Town Council will indemnify the Herefordshire Council against any claims in respect of injury, damage or loss, arising out of, or as a result of its works on the highway verge and the presence of employees carrying out works, including operating machinery and tools within the highway.
- The Town Council will ensure that the area of roundabout etc is left clean and tidy and nothing shall be deposited in the adjacent carriageway.
- 8. The Town Council shall ensure that all necessary steps are taken to prevent damage to any Statutory Undertakers', British Telecom and/or Sewerage Authorities' apparatus, which may be affected by the proposed planting. In this respect the Parish Council's attention is drawn to the comments contained in the attached copy letters.

AM/LIC/05-03 Version 1.0 January 2007 Herefordshire Council Unit 3, Thorn Business Park Rotherwas Industrial Estate Hereford HR2 6JT

Main Switchboard: 01432 260000

9. When the Town Council is prepared to proceed with the planting, it shall send a notice to the Network Regulation Manager, 7 days before the proposed starting date to enable him to give his requirements or supervise work as necessary.

Dated: 27th November 2020

Signed on behalf of the Council

Anthony Agate, Network Regulation Manager

Herefordshire Council Unit3, Thorn Business Park Rotherwas Industrial Estate Hereford HR2 6JT

Main Switchboard: 01432 260000





Agenda Item 19

- 1. Home (https://www.gov.uk/)
- 2. Housing, local and community (https://www.gov.uk/housing-local-and-community)
- 3. Planning and building (https://www.gov.uk/housing-local-and-community/planning-and-building)
- 4. Planning reform (https://www.gov.uk/housing-local-and-community/planning-reform)
- 5. Changes to the current planning system (https://www.gov.uk/government/consultations/changes-tothe-current-planning-system)
- Ministry of Housing, Communities & Local Government (https://www.gov.uk/government/organisations/ministry-of-housing-communities-andlocal-government)

Consultation outcome

Government response to the local housing need proposals in "Changes to the current planning system"

Updated 16 December 2020

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This publication is available at https://www.gov.uk/government/consultations/changes-to-the-current-planning-system/outcome/government-response-to-the-local-housing-need-proposals-in-changes-to-the-current-planning-system

Introduction

On 6 August 2020, the government published 'Changes to the current planning system'. The consultation paper set out four policy proposals to improve the effectiveness of the current system:

- changing the standard method for assessing local housing need, to plan for the delivery of 300,000 new homes a year and plan for more homes in the right places;
- securing First Homes, sold at a discount to market price for first time buyers, including key workers, through developer contributions;
- temporarily lifting the small sites threshold below which developers do not need to contribute to affordable housing, to up to 40 or 50 units, to support SME builders as the economy recovers from the impact of the COVID-19 pandemic; and
- extending the current Permission in Principle to major development so that landowners and developers can secure the principle of development for housing on sites without having to work up detailed plans first.

The consultation closed on 1 October 2020.

This government response provides a response to the first of the four consultation proposals – changes to the standard method for assessing local housing need (the 'standard method').

We are carefully considering the responses to the other proposed policy changes covered in this consultation. In doing so, we will assess whether the small sites threshold and extending Permission in Principle are best addressed in the context of our proposals for wider reform. We will be responding to proposals to secure First Homes through developer contributions in the short term in the New Year.

The detailed conclusions set out in this response have been informed by the responses to the questions directly relating to the standard method, and the responses relevant to the standard method in the question on the equality impacts relating to the overall impacts of the proposals.

Overview

There were 2,398 responses to the Changes to the current planning system consultation. Not all respondents answered every question. All responses have been analysed for the changes to the standard method policy questions (questions 1 to 7) and the equality impact question (question 35) and given full consideration in the preparation of this response. We are grateful to everyone who took the time to respond. The table below provides a breakdown of the general consultation responses by type of respondent.

Type of consultation respondent	Number of responses
Local Authority (including National Parks, Broads Authority, the Greater London Authority and London Boroughs)	321
Government / Arms-length body	9
Non-Governmental Organisation (NGO)	29

Type of consultation respondent	Number of responses
Community Group / Parish Council / Neighbourhood Forum	507
Developer / construction	68
Landowner	1
Land agent / Land promoter	10
Architecture / Urban design	5
Housing charity / campaign	22
Housing Association	34
Business / Trade body	28
Planning / development consultancy	44
Digital technology organisations	0
nfrastructure provider	2
Other	138
Organisation total	1,218
Personal / independent responses	1,180
otal number of responses	2,398

This document provides a summary of the consultation responses received. It does not attempt to capture every point made. It sets out the proposed changes the government is making, having taken the consultation responses into account. Where the government has decided not to make further changes to the consultation proposals, the reasons are explained.

Proposed changes to the standard method for assessing local housing need

We do not propose to proceed with the specific changes to the standard method that were consulted on. The reasons for this are set out below. Instead we will proceed with a reformed standard method which reflects our commitment to levelling up and enables regeneration and renewal of our urban areas as we recover from the COVID-19 pandemic.

In Changes to the current planning system, the government set out the importance of building the homes our communities need and putting in place measures to support our housing market to deliver 300,000 homes a year by mid-2020s. We set out that our proposed changes to the standard method were based on overarching principles as stated in paragraph 17 of the consultation. These were ensuring that the new standard method delivers a number nationally that is consistent with the

commitment to plan for the delivery of 300,000 new homes a year, a focus on achieving a more appropriate distribution of homes, and on targeting more homes into areas where there are affordability challenges. We remain committed to these principles.

We have listened carefully to the feedback on our proposals, within the consultation and outside of this, including in Parliament, through discussions with stakeholders and in the media, have heard concerns that the distribution of need was not right. In particular, we heard that too much strain was being put on our rural areas and not enough focus was on the renewal of our towns and cities.

In addition, since we published the consultation, the way that the country lives, works and travels continues to change more rapidly than at any time since the war. This has implications, for example, on demand for commercial and retail floorspace in our cities and urban areas. We want our towns and cities to emerge from the pandemic renewed and strengthened - more beautiful, more healthy, more environmentally sustainable and more neighbourly places, with greater public and private investment in urban housing and regeneration.

More broadly, we heard suggestions in the consultation that in some places the numbers produced by the standard method pose a risk to protected landscapes and Green Belt. We should be clear that meeting housing need is never a reason to cause unacceptable harm to such places. But harm or homes is not a binary choice. We can plan for well designed, beautiful homes, with access to the right infrastructure in the places where people need and want to live while also protecting the environment and green spaces communities most value. If we do this well, we can achieve all this whilst giving a new generation the chance to access the homes they deserve. The same chances generations before them were given. This is a matter of social justice and inter-generational fairness. It would be wrong for our built environment to respond only to the needs of older, wealthier people. We can and must strive to build more homes, but to do so with sensitivity and care for the environment, heritage and the character of existing communities.

A number of the concerns we have heard showed some misunderstanding about what was being proposed.

Many respondents to the consultation were concerned that the 'targets' provided by the standard method were not appropriate for individual local authority areas. Within the current planning system the standard method does not present a 'target' in plan-making, but instead provides a starting point for determining the level of need for the area, and it is only after consideration of this, alongside what constraints areas face, such as the Green Belt, and the land that is actually available for development, that the decision on how many homes should be planned for is made. It does not override other planning policies, including the protections set out in Paragraph 11b of the NPPF (https://www.gov.uk/guidance/national-planning-policy-framework/2-achieving-sustainabledevelopment#para011) or our strong protections for the Green Belt. It is for local authorities to determine precisely how many homes to plan for and where those homes most appropriately located. In doing this they should take into account their local circumstances and constraints. In order to make this policy position as clear as possible, we will explore how we can make changes through future revisions to the National Planning Policy Framework, including whether a renaming of the policy could provide additional clarity.

Next steps

Proposal

Having taken the responses into account, we have decided the most appropriate approach is to retain the standard method in its current form. However, in order to meet our principles of delivering more homes on brownfield land we will apply a 35 per cent uplift to the post-cap number generated by the standard method to Greater London and to the local authorities which contain the largest

proportion of the other 19 most populated cities and urban centres in England. This is based on the Office for National Statistics list of Major Towns and Cities, ranked in order of population size using the latest mid-year population estimates provided by the Office for National Statistics.

As at the date of this government response and in order of size beginning with the largest as per the 2019 mid-year estimates (latest estimates), these places are: London, Birmingham, Liverpool, Bristol, Manchester, Sheffield, Leeds, Leicester, Coventry, Bradford, Nottingham, Kingston upon Hull, Newcastle upon Tyne, Stoke-on-Trent, Southampton, Plymouth, Derby, Reading, Wolverhampton, and Brighton and Hove.

The 20 authorities which contain the largest proportion of the city or urban centre's population will have the 35 per cent uplift applied. The cities and urban centres list was objectively determined using national datasets provided by the Office for National Statistics to determine the urban local authorities which contain the largest proportion of the 20 most populated cities and urban centres in England.

Our rationale for doing this is as follows.

Rationale for cities and urban centres uplift

In relation to the cities and urban centres uplift, we have heard representations that we can do more to increase home-building in existing urban areas to make the most of previously developed brownfield land over and above that in the existing standard method. There are three strong reasons for doing so. First, building in existing cities and urban centres ensures that new homes can maximise existing infrastructure such as public transport, schools, medical facilities and shops. Second, there is potentially a profound structural change working through the retail and commercial sector, and we should expect more opportunities for creative use of land in urban areas to emerge. Utilising this land allows us to give priority to the development of brownfield land, and thereby protect our green spaces. And third, our climate aspirations demand that we aim for a spatial pattern of development that reduces the need for unnecessary high-carbon travel. We have heard support for these objectives. We have chosen a 35 per cent uplift to ensure consistency with the government's Manifesto commitment to see 300,000 homes per year delivered by the mid 2020s. The Government is also keen to ensure that all areas plan for the right, size, type and tenure of homes, and in particular to ensure that appropriate numbers of family homes come forward, and would encourage these all places, but particular the urban centres, to consider carefully how they deliver the right mix for their communities. Getting this mix right will maximise the beneficial impact that the delivery of more homes can bring. For example, planning for the right size homes can help address affordability and planning for specialist housing such as older peoples' housing can have the knock-on effect of freeing up much needed family homes. In addition, planning for more routes into home ownership, such as First Homes and Shared Ownership, will help younger people make that important first step onto the housing ladder.

The increase in the number of homes to be delivered is expected to be met by the cities and urban centres themselves, rather than the surrounding areas. In considering how need is met in the first instance, brownfield and other under-utilised urban sites should be prioritised to promote the most efficient use of land. Development should align with the character of local neighbourhoods in urban areas and support the building of green homes. This is to ensure that homes are built in the right places, to make the most of existing infrastructure, and to allow people to live nearby the services they rely on, making travel patterns more sustainable. Local planning authorities should co-operate on that basis, notwithstanding any longer-term proposals set out in the Planning for the Future White Paper which explain that we intend to abolish the Duty to Cooperate. We will set out any decisions and any associated proposed implementation following from consideration of the responses to that consultation in due course

This cities and urban centres uplift is being implemented through revisions to the relevant planning practice guidance. $1 \leq 4 \leq$

Rationale for retaining current approach

In addition, and having reflected on the points made through the consultation, the government has concluded that this approach will provide stability and certainty for plan-making and decision-making, so that local areas can get on and plan based on a method and level of ambition that they are familiar with. We know that change can cause uncertainty and delays and after a year of uncertainty due to COVID-19 it is particularly important that the standard method does not act as a barrier to planning for the homes needed. In particular:

- We will continue to use the 2014-based household projections. The government has carefully considered whether to use the 2018-based household projections and has concluded that, due to the substantial change in the distribution of housing need that would arise as a result, in the interests of stability for local planning and for local communities, it will continue to expect only the use of the 2014-based projections.
- · The government wants to ensure that work continues to progress Local Plans through to adoption as soon as possible and, at a minimum, by the end of 2023 to help ensure that the economy can rebound from COVID-19.
- · We will continue to specify that the most recent affordability ratios should be used ensuring relevant market signals continue to play a role.
- The government will retain the provision that caps increases in local housing need in each planning cycle at 40%, except for in areas where the cities uplift is applied.

London

It is clear that in London, in the medium term, there will need to be a much more ambitious approach to delivering the homes the capital needs. The Secretary of State for Housing, Communities and Local Government expects to agree the London Plan with the Mayor shortly. This new plan, when adopted, will set London's housing requirement for the next 5 years. The local housing need uplift we are setting out today will therefore only be applicable once the next London Plan is being developed. In order to support London to deliver the right homes in the right places, the government and Homes England are working with the Greater London Authority to boost delivery through the Home Building Fund. Homes England has been providing expertise and experience to support the development of key sites in London. Sites like Old Oak Common, Nine Elms and Inner East London provide opportunities to deliver homes on significant brownfield sites. The Secretary of State for Housing, Communities and Local Government will consider giving Homes England a role in London to help meet this challenge, working more closely with the Greater London Authority, boroughs and development corporations to take a more direct role in the delivery of strategic sites in London and the preparation of robust bids for the new National Homebuilding Fund.

Transition

In providing the important clarity and certainty to enable places to rapidly progress with their plans, and making no changes to the existing standard method, there will be no direct impact on the majority of authorities. These should continue to bring forward plans as quickly as possible. However, there will be transitional arrangements for those cities and urban centres delivering the additional cities and urban centres uplift. From the date of publication of the amended planning practice guidance which implements the cities and urban centres uplift, authorities already at Regulation 19[2], will have six months to submit[3] their plans to the Planning Inspectorate for examination, using the previous standard method[4]. In recognition that some areas will be very close to publishing their Regulation 19[5] plan, these areas will be given three months from the publication date of the revised

guidance to publish their Regulation 19 plan, as well as a further six months from the date they publish their Regulation 19 plan to submit their plan to the Planning Inspectorate for examination, to benefit from the transition period.

The standard method has a role not only in plan-making, but is also used in planning decisions to determine whether an area has identified a 5 year land supply for homes and for the purposes of the Housing Delivery Test (where strategic policies are more than five years old). Where this applies, the revised standard method (inclusive of the cities and urban areas uplift) will not apply for a period of six months from the publication of the amended planning practice guidance. After 6 months, the new standard method will apply.

Question responses

Question 1

Do you agree that planning practice guidance should be amended to specify that the appropriate baseline for the standard method is whichever is the higher of the level of 0.5% of housing stock in each local authority area OR the latest household projections averaged over a 10-year period?

Question 1 response

There were 2,121 responses to this question, with 1,952 respondents providing a comment, and 1,546 providing a yes/no/not sure response. The percentages quoted below relate specifically to those respondents where their response could be quantified, in other words, those who provided a yes/no/not sure response.

20% of organisations supported this proposal, with 66% disagreeing and the remaining respondents (14%) not sure.

7% of individuals supported this proposal, with 83% disagreeing, and the remaining respondents (10%) not sure.

Overall, this resulted in 14% support for the proposal, 74% against and 12% not sure.

Points raised from those who commented include:

- · Local authorities support the principle of bringing stability to the method, agreeing that it could spread housing more fairly across the country. However, they noted that stock is not a determinant of future housing need and acknowledged the volatility and unpredictability of household projections.
- Developers and the construction sector consider that the proposals would introduce a simpler method of quantifying the amount of housing an area needs. These respondents welcome a move away from the over-reliance on household projections, with some supporting a higher baseline figure for housing stock.
- · There are merits in introducing an element of standardisation to assess housing need to reduce uncertainty and increase data transparency. The proposals were seen as a positive addition to allow local planning authorities to plan for growth more effectively, but did not go far enough to support the levelling-up agenda.
- · Respondents acknowledge the known limitations of household projections from the consultation document but recognise it is a reliable and accessible dataset, and that the housing stock figure merely reinforces existing patterns of growth.

Government response

We are no longer proposing to take forward a stock element in the changes to the standard method and we propose to maintain the 2014-based household projections. The government has carefully considered whether to use the 2018-based household projections and has concluded that, due to the substantial change in the distribution of housing need that would arise as a result, in the interests of stability for local planning and for local communities, it will continue to expect only the use of the 2014-based projections Please refer to the policy response, stated under Proposed changes to the standard method for assessing local housing need and Next Steps.

Question 2

In the stock element of the baseline, do you agree that 0.5% of existing stock for the standard method is appropriate? If not, please explain why.

Question 2 response

There were 1,502 responses overall to this question with 1,240 respondents providing a comment and 1,293 providing a yes / no / not sure response. The percentages quoted below relate to those who provided a yes / no / not sure response.

18% of organisations supported this proposal, with 65% disagreeing and the remaining respondents (17%) not sure.

9% of individuals supported this proposal, with 71% disagreeing, and the remaining respondents (20%) not sure.

Overall, this resulted in 14% support for the proposal, 68% against and 19% not sure.

Points raised from those who commented include:

- Where the use of stock is supported, across a range of stakeholders there were suggestions
 that the level of stock should be higher, with suggestions ranging mostly between 0.7 and 1%.
- Linked to this were concerns from across the different groups about the different impacts the
 proposed level of 0.5% stock would have in different parts of England, including leading to more
 homes in London and the South East than the North, which does not sufficiently support the
 government's levelling up agenda.
- Those who are concerned felt that the focus on stock does not directly reflect need or demand.
 There are also concerns from local authorities, community groups and individuals, about the potential detrimental impact on rural areas or areas with constraints.

Government response

We are no longer proposing to take forward a stock element in the changes to the standard method.

Please refer to the policy response, stated under Proposed changes to the standard method for assessing local housing need and Next Steps.

Question 3

Do you agree that using the workplace-based median house price to median earnings ratio from the most recent year for which data is available to adjust the standard method's baseline is appropriate? If not, please explain why.

Question 3 response

There were 1,567 responses to this question, with 1,301 respondents providing a comment, and 1,382 providing a yes/no/not sure response. The percentages quoted below relate specifically to those respondents where their response could be quantified, in other words, those who provided a yes/no/not sure response.

31% of organisations supported this proposal, with 56% disagreeing and the remaining respondents (13%) not sure.

9% of individuals supported this proposal, with 74% disagreeing, and the remaining respondents (18%) not sure.

Overall, this resulted in 20% support for the proposal, 65% against and 16% not sure.

Points raised from those who commented include:

- · For those supporting the measure, respondents suggest the workplace-based median house price to median earnings ratio is the most appropriate and relevant metric to use, although some respondents noted that renters were not taken into account in this ratio.
- · Concerns about the effect of commuters on the affordability ratio, such as where high earners impact on local affordability especially in London and the South-East. Some respondents suggest the residence-based ratio could be used to overcome this. Comments also indicated that this could result in a geographical disparity between the north and south.
- That focus on affordability is too narrow, stating that house prices are affected by other factors than only supply (such as interest rates, economic growth) which can impact the affordability of an area.
- · That there may be effects of COVID-19 on house prices and earnings, which could affect the affordability ratio going forward. Some respondents suggest using a longer period to overcome year-on-year volatility.

Government response

In relation to the issue of the most appropriate affordability assessment to use, workplace-based or residence-based, we intend to continue using the workplace-based earnings ratio, published annually by the Office for National Statistics. This compares the median salary earnt in a local authority against the median house price in that same authority area. This ratio is used as people typically choose to live close to where they work - and therefore is a proxy for demand within the housing market.

Please refer to the policy response, stated under Proposed changes to the standard method for assessing local housing need and Next Steps.

Question 4

Do you agree that incorporating an adjustment for the change of affordability over 10 years is a positive way to look at whether affordability has improved? If not, please explain why.

Question 4 response

There were 1,430 responses to this question, with 1,113 respondents providing a comment, and 1,251 providing a yes/no/not sure response. The percentages quoted below relate specifically to those respondents where their response could be quantified, in other words, those who provided a yes/no/not sure response. 1549

36% of organisations supported for this proposal, with 49% disagreeing and the remaining respondents (14%) not sure.

17% of individuals supported this proposal, 59% disagreeing, and the remaining respondents (24%) not sure.

Overall, this resulted in 27% support for the proposal, 54% against and 19% not sure.

Points raised from those who commented include:

- Those respondents who show support considered the 10-year change proposal to be reasonable, logical or proportionate. Comments were that it worked well alongside the 10-year household projections time period and would make the methodology responsive to longer term trends as well as sudden changes such as a recession.
- For some people the 10-year period was not appropriate and should be either longer (20 years), shorter (5 years, (most commonly suggested by local authorities)), or a rolling average.
- That proposals overcomplicate the calculation by double counting affordability, or conversely oversimplify the approach by not including other important factors - for example developers suggested including job density data as another factor.
- · There is comment, including from planning and development consultancies, that this would not support the levelling up agenda between North and South.

Government response

We no longer propose to introduce this element to the standard method.

Please refer to the policy response, stated under Proposed changes to the standard method for assessing local housing need and Next Steps.

Question 5

Do you agree that affordability is given an appropriate weighting within the standard method? If not, please explain why.

Question 5 response

There were 1,620 responses to this question, with 1,352 respondents providing a comment, and 1,178 providing a yes/no/not sure response. The percentages quoted below relate specifically to those respondents where their response could be quantified, in other words, those who provided a ves/no/not sure response.

22% of organisations supported this proposal, with 60% disagreeing and the remaining respondents (18%) not sure.

10% of individuals supported this proposal, with 66% disagreeing and the remaining respondents (24%) not sure.

Overall, this resulted in 16% support for the proposal, 63% against and 21% not sure.

Points raised from those who commented include:



- · Affordability is given too great a weight in the proposals resulting in excessive uplift over the baseline, relative to other factors such as constraints, according to the majority of those opposed. Conversely, a very small number thought the weighting should be higher, with developers keen to ensure that constraints do not cause final figures to drop.
- · Certain groups are more favourable to the proposals, particularly the development industry.
- · Concern that the approach would skew housing need too strongly towards expensive regions such as London and the South East, and would therefore be detrimental in levelling-up the North. A related, less commonly expressed, concern is that development would be channelled towards expensive but sensitive rural areas and protected landscapes.
- · More generally, a common view is that the additional dwellings delivered due to the affordability uplift would not actually have the desired effect of reducing house prices.

Government response

In recognition of concerns that affordability was over-emphasised in our proposals, the new approach will not put any additional weighting on affordability within the formula. The existing weighting will be maintained.

Please refer to the policy response, stated under Proposed changes to the standard method for assessing local housing need and Next Steps.

Question 6

Do you agree that authorities should be planning having regard to their revised standard method need figure, from the publication date of the revised guidance, with the exception of: Authorities which are already at the second stage of the strategic plan consultation process (Regulation 19), which should be given 6 months to submit their plan to the Planning Inspectorate for examination? If not, please explain why. Are there particular circumstances which need to be catered for?

Question 6 response

There were 1,309 responses to this question, with 994 respondents providing a comment, and 1,078 providing a yes/no/not sure response. The percentages quoted below relate specifically to those respondents where their response could be quantified, in other words, those who provided a yes/no/not sure response.

35% of organisations showed support for this proposal, with 41% disagreeing and the remaining respondents (23%) not sure.

19% of individuals supported this proposal, with 55% disagreeing and the remaining respondents (26%) not sure.

Overall, this resulted in 27% support for the proposal, 48% against and 25% not sure.

Points raised from those who commented include:

· A six-month transition period is felt to be too short by many respondents and should be extended. Suggestions included nine to twelve months, particularly in light of current resourcing pressures faced by local authorities in meeting these timescales. They also consider that it would provide an opportunity to reflect on the COVID-19 crisis with the potentially substantial

implications on the housing market, and the effects of a change to home working, as well as future use of office property, commuting patterns, demand for larger homes and access to green spaces.

- · Developers consider that six months is appropriate in recognising the need for a transition period, although some felt it may be too long to ensure that housing numbers are brought up to date quickly. Comment also included that the transition period may create a period of uncertainty while areas process what the changes mean for them, potentially delaying delivery, while other plans might be rushed through ill-advisedly.
- · There are concerns about the consequential impact of the new LHN in relation to calculations of the 5-year land supply, and the presumption in favour of sustainable development, and comment that further transitional arrangements should be applied here.

Government response

We anticipate that transitional arrangements will only apply to a small number of authorities. We intend to implement a transition period as proposed in the consultation (i.e. authorities already at Regulation 19 will be given six months from the publication date of the revised guidance to submit their plans to the Planning Inspectorate under the existing standard method). However, this transition period is only for those areas delivering the additional cities and urban centres uplift and will not apply to other areas. We recognise concerns expressed by some in the consultation that the six months transition period may be too short, but we feel that six months is appropriate to ensure that the country begins planning for the numbers of homes we need without significant delay.

In recognition that the standard method has a role not only in plan-making, but also is used in planning decisions to determine whether an area has identified a 5-year land supply for homes and for the purposes of the Housing Delivery Test (where strategic policies are more than five years old), we want to be clear how the new standard method applies in these circumstances. For those areas with the additional cities and urban uplift, transitional arrangements will apply in decision-making in applying the standard method, to ensure that the 20 cities and urban centres are not immediately affected by increased land supply expectations. These transitional arrangements will apply for six months from the date of publication of the guidance. After six months, the standard method will apply.

Please refer to the policy response, stated under Proposed changes to the standard method for assessing local housing need and Next Steps.

Question 7

Do you agree that authorities should be planning having regard to their revised standard method need figure, from the publication date of the revised guidance, with the exception of: Authorities close to publishing their second stage consultation (Regulation 19), which should be given 3 months from the publication date of the revised guidance to publish their Regulation 19 plan, and a further 6 months to submit their plan to the Planning Inspectorate? If not, please explain why. Are there particular circumstances which need to be catered for?

Question 7 response

There were 1,317 responses to this question, with 987 respondents providing a comment, and 1,084 providing a yes/no/not sure response. The percentages quoted below relate specifically to those respondents where their response could be quantified, in other words, those who provided a yes/no/not sure response.

33% of organisations supported this proposal, with 44% disagreeing and the remaining respondents (23%) not sure.

19% of individuals supported this proposal, with 54% disagreeing and the remaining respondents (27%) not sure.

Overall, this resulted in 26% support for the proposal, 49% against and 25% not sure.

Points raised from those who commented include:

- The significant constraints imposed by typical resourcing levels at local authorities, allowing for
 existing plan-making work, the practical circumstances of the COVID-19 pandemic, and the
 realistic ability of local authorities being able to progress a local plan to second stage
 consultation in the timescale proposed.
- Suggestions for a longer transition period, particularly from local authorities, to publish a second stage consultation. An extension from three to six months is generally the most common suggested, although other suggestions were that areas that have published a first stage consultation should benefit from transitional arrangements.
- Other alternatives include a shorter or narrower transition period (particularly suggested by developers), no transition measures at all, or considering wider modifications to the application of LHN in the planning process.

Government response

See section on transitional arrangements for specific details of how the transitional arrangements will apply. We recognise concerns expressed by some in the consultation that transition periods may be too short, but we consider that the detailed proposals set out are appropriate to ensure that the country begins planning for the numbers of homes we need without significant delay.

Please refer to the policy response, stated under Proposed changes to the standard method for assessing local housing need and Next Steps.

Question 35

In light of the proposals set out in this consultation, are there any direct or indirect impacts in terms of eliminating unlawful discrimination, advancing equality of opportunity and fostering good relations on people who share characteristics protected under the Public Sector Equality Duty? If so, please specify the proposal and explain the impact. If there is an impact – are there any actions which the department could take to mitigate that impact?

Question 35 response

This question did not ask for yes / no / not sure options. There were 845 comment responses to this question.

It should be noted that this question related to all the policy areas consulted on in the 'Changes to the current planning system' consultation - changes to the standard method; securing First Homes through developer contributions; temporarily lifting the small sites threshold; and extending the current Permission in Principle to major development.

The analysis below relates only to the equality aspects related to the standard method. Those issues related to the remaining policy areas will be considered separately.

Points raised from those who commented include:

- With regard to transitional proposals, the importance of ensuring everyone has sufficient opportunity to engage in any local plan consultation processes, particularly where internet access or access to technology is an issue for some demographics and some areas of the country.
- · Concern that Gypsies and Travellers are not sufficiently accounted for in the proposed overall housing numbers.
- That unrealistic housing targets might be created by not accounting for communal establishments.
- · That proposals penalise those with equity saved in their homes, likely older people; prioritises homeownership which will benefit particular groups over others; and do not support the levellingup agenda by not supporting economically deprived areas which have, for example, a greater proportion of BAME individuals.
- Perceived reduction in Local Authority influence on housing need and allocation under the proposals.

Government response

The equality impact question was focused on the impacts of the consultation proposals which were not taken forward. However, the final policy proposals were considered in light of a detailed assessment of the equality impacts as required by the Public Sector Equality Duty (PSED).

As part of the PSED we sourced the relevant population and equality data using mid-year estimates and Annual Population Survey data to understand the impact a cities and urban centres uplift would have on our existing policy, comparing data between the 20 cities and urban centres and the England average. We concluded that uplifting the housing numbers in these cities and urban centres would appear to support younger people proportionately more, as well as men and those not reporting as white UK national. This will help support those from different ethnic minorities and younger people to access a greater number of homes. In particular this will support younger people into home ownership. While this may also mean that older people, women and those reporting as white UK national are less likely to live in cities and urban centres, we feel that this is mitigated by the fact that those areas which will not have a cities and urban centres uplift will continue with the same standard method as previously, so they do not experience a decrease in the number of homes being planned for. Please refer to the policy response, stated under Proposed changes to the standard method for assessing local housing need and Next Steps.

[2] For Spatial Development Strategies this would refer to consultation under s335(2) of the Greater London Authority Act 1999

[3] For spatial development strategies, 'submission' in this context means the point at which the Mayor sends to the Panel copies of all representations made in accordance with regulation 8(1) of the Town and Country Planning (London Spatial Development Strategy) Regulations 2000, or equivalent.

[4] As contained housing and economic needs assessment planning practice guidance, published February 2019

[5] For Spatial Development Strategies this would refer to consultation under s335(2) of the Greater London Authority Act 1999 1554

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Indicative Local Housing Need (December 2020 Revised Methodology)

Published 16th December 2020

All figures presented are based on data available at the date of publication and should not be All plans annual requirement figures used within the cap (step 3) have not been fully verified. All figures have been rounded to the nearest whole number.

ONS Code	Local Authority Name	
E07000223	Adur	
E07000026	Allerdale	
E07000032	Amber Valley	
E07000224	Arun	
E07000170	Ashfield	
E07000105	Ashford	
E07000004	Aylesbury Vale	
E07000200	Babergh	
E08000016	Barnsley	
E07000027	Barrow-in-Furness	
E07000066	Basildon	
E07000084	Basingstoke and Deane	
E07000171	Bassetlaw	
E06000022	Bath and North East Somerset	
E06000055	Bedford	
E08000025	Birmingham	
E07000129	Blaby	
E06000008	Blackburn with Darwen	
E06000009	Blackpool	
E07000033	Bolsover	
E08000001	Bolton	
E07000136	Boston	
E06000028	Bournemouth	
E06000036	Bracknell Forest	
E08000032	Bradford	
E07000067	Braintree	
E07000143	Breckland	
E07000068	Brentwood	
E06000043	Brighton and Hove	
E06000023	Bristol, City of	
E07000144	Broadland	
E07000234	Bromsgrove	
E07000095	Broxbourne	
E07000172	Broxtowe	
E07000117	Burnley	
E08000002	Bury	
E08000033	Calderdale	
E07000008	Cambridge	
E07000192	Cannock Chase	
E07000106	Canterbury	
E07000028	Carlisle	

E07000069 Castle Point E06000056 Central Bedfordshire E07000130 Charnwood E07000070 Chelmsford E07000078 Cheltenham E07000177 Cherwell E06000049 Cheshire East E06000050 Cheshire West and Chester E07000034 Chesterfield E07000225 Chichester E07000005 Chiltern E07000118 Chorley E07000048 Christchurch E07000071 Colchester E07000029 Copeland E07000150 Corby E06000052 Cornwall E07000079 Cotswold E06000047 **County Durham** E08000026 Coventry E07000163 Craven E07000226 Crawley E07000096 Dacorum E06000005 Darlington E07000107 Dartford E07000151 Daventry E06000015 Derby E07000035 **Derbyshire Dales** E08000017 Doncaster E07000108 Dover E08000027 Dudley E07000009 East Cambridgeshire E07000040 East Devon E07000049 East Dorset E07000085 East Hampshire E07000242 East Hertfordshire E07000137 East Lindsey E07000152 East Northamptonshire E06000011 East Riding of Yorkshire E07000193 East Staffordshire E07000061 Eastbourne E07000086 Eastleigh E07000030 Eden E07000207 Elmbridge E07000072 **Epping Forest** E07000208 Epsom and Ewell E07000036 Erewash

E07000041

E07000087

E07000010

Exeter

Fareham

Fenland

E07000112 Folkestone and Hythe E07000201 Forest Heath Forest of Dean E07000080 Fylde E07000119 Gateshead E08000037 Gedling E07000173 Gloucester E07000081 E07000088 Gosport E07000109 Gravesham **Great Yarmouth** E07000145 Guildford E07000209 Halton E06000006 Hambleton E07000164 Harborough E07000131 Harlow E07000073 Harrogate E07000165 E07000089 Hart E06000001 Hartlepool Hastings E07000062 Havant E07000090 Herefordshire, County of E06000019 Hertsmere E07000098 High Peak E07000037 Hinckley and Bosworth E07000132 Horsham E07000227 E07000011 Huntingdonshire Hyndburn E07000120 E07000202 **Ipswich** E06000046 Isle of Wight Isles of Scilly E06000053 Kettering E07000153 King's Lynn and West Norfolk E07000146 Kingston upon Hull, City of E06000010 Kirklees E08000034 E08000011 Knowsley Lancaster E07000121 Leeds E08000035 E06000016 Leicester Lewes E07000063 Lichfield E07000194 Lincoln E07000138 Liverpool E08000012 Luton E06000032 E07000110 Maidstone Maldon E07000074 Malvern Hills E07000235 Manchester E08000003 Mansfield E07000174 Medway E06000035 Melton E07000133

E07000187 Mendip E07000042 Mid Devon E07000203 Mid Suffolk E07000228 Mid Sussex E06000002 Middlesbrough E06000042 Milton Keynes E07000210 Mole Valley E07000091 **New Forest** E07000175 Newark and Sherwood E08000021 Newcastle upon Tyne E07000195 Newcastle-under-Lyme E07000043 North Devon E07000050 North Dorset E07000038 North East Derbyshire E06000012 North East Lincolnshire E07000099 North Hertfordshire E07000139 North Kesteven E06000013 North Lincolnshire E07000147 North Norfolk E06000024 North Somerset E08000022 North Tyneside E07000218 North Warwickshire E07000134 North West Leicestershire E07000154 Northampton E06000057 Northumberland E07000148 Norwich E06000018 Nottingham E07000219 Nuneaton and Bedworth E07000135 Oadby and Wigston E08000004 Oldham E07000178 Oxford E07000122 Pendle E06000031 Peterborough E06000026 Plymouth E06000029 Poole E06000044 Portsmouth E07000123 Preston E07000051 Purbeck E06000038 Reading E06000003 Redcar and Cleveland E07000236 Redditch E07000211 Reigate and Banstead E07000124 Ribble Valley E07000166 Richmondshire E08000005 Rochdale E07000075 Rochford E07000125 Rossendale E07000064 Rother E08000018 Rotherham

E07000220

Rugby

Runnymede E07000212 Rushcliffe E07000176 Rushmoor E07000092 Rutland E06000017 Ryedale E07000167 Salford E08000006 E08000028 Sandwell Scarborough E07000168 Sedgemoor E07000188 Sefton E08000014 E07000169 Selby Sevenoaks E07000111 Sheffield E08000019 Shropshire E06000051 Slough E06000039 Solihull E08000029 South Bucks E07000006 E07000012

E07000012 South Cambridgeshire
E07000039 South Derbyshire
E06000025 South Gloucestershire

E07000044 South Hams
E07000140 South Holland
E07000141 South Kesteven
E07000031 South Lakeland
E07000149 South Norfolk

E07000155 South Northamptonshire E07000179 South Oxfordshire

E07000126 South Ribble
E07000189 South Somerset
E07000196 South Staffordshire
E08000023 South Tyneside
E06000045 Southampton
E06000033 Southend-on-Sea

E07000213 Spelthorne E07000240 St Albans E07000204 St Edmundsbury

E08000013 St. Helens E07000197 Stafford

E07000198 Staffordshire Moorlands

E07000243 Stevenage E08000007 Stockport

E06000004 Stockton-on-Tees
E06000021 Stoke-on-Trent
E07000221 Stratford-on-Avon

E07000082 Stroud

E07000205 Suffolk Coastal E08000024 Sunderland E07000214 Surrey Heath

E07000113 Swale E06000030 Swindon

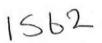
E08000008 Tameside E07000199 Tamworth E07000215 Tandridge E07000190 **Taunton Deane** E07000045 Teignbridge E06000020 Telford and Wrekin E07000076 Tendring E07000093 Test Valley E07000083 Tewkesbury E07000114 Thanet E07000102 Three Rivers E06000034 Thurrock E07000115 Tonbridge and Malling E06000027 Torbay E07000046 Torridge E08000009 Trafford Tunbridge Wells E07000116 E07000077 Uttlesford E07000180 Vale of White Horse E08000036 Wakefield E08000030 Walsall E06000007 Warrington E07000222 Warwick E07000103 Watford E07000206 Waveney E07000216 Waverley E07000065 Wealden E07000156 Wellingborough E07000241 Welwyn Hatfield E06000037 West Berkshire E07000047 West Devon E07000052 West Dorset E07000127 West Lancashire E07000142 West Lindsey E07000181 West Oxfordshire E07000191 West Somerset E07000053 Weymouth and Portland E08000010 Wigan E06000054 Wiltshire E07000094 Winchester E06000040 Windsor and Maidenhead E08000015 Wirral E07000217 Woking E06000041 Wokingham E08000031 Wolverhampton E07000237 Worcester E07000229 Worthing E07000238 Wychavon E07000007 Wycombe E07000128 Wyre

E07000239 Wyre Forest E06000014 York

ONS Code	London Authority Area
E09000002	Barking and Dagenham
E09000003	Barnet
E09000004	Bexley
E09000005	Brent
E09000006	Bromley
E0900007	Camden
E0900001	City of London
E09000008	Croydon
E09000009	Ealing
E09000010	Enfield
E09000011	Greenwich
E09000012	Hackney
E09000013	Hammersmith and Fulham
E09000014	Haringey
E09000015	Harrow
E09000016	Havering
E09000017	Hillingdon
E09000018	Hounslow
E09000019	Islington
E09000020	Kensington and Chelsea
E09000021	Kingston upon Thames
E09000022	Lambeth
E09000023	Lewisham
E09000024	Merton
E09000025	Newham
E09000026	Redbridge
E09000027	Richmond upon Thames
E09000028	Southwark
E09000029	Sutton
E09000030	Tower Hamlets
E09000031	Waltham Forest
E09000032	Wandsworth
E09000033	Westminster
	London Total

Joint Plan Area

Broadland; Norwich; South Norfolk
East Dorset, Christchurch
Lincoln, North Kesteven, West Lindsey
North Devon, Torridge
West Dorset, Weymouth and Portland
Malvern Hills, Worcester, Wychavon
Plymouth, South Hams, West Devon



ONS Code	Reorganised Authority Name
E07000244	East Suffolk
E07000246	Somerset West and Taunton
E07000245	West Suffolk
E06000058	Bournemouth, Christchurch and Poole
E06000059	Dorset

ONS Code	Re-organised Authority Predecessor Authority Name
E06000028	Bournemouth
E07000050	North Dorset
E06000029	Poole
E07000051	Purbeck
E07000205	Suffolk Coastal
E07000206	Waveney
E07000190	Taunton Deane
E07000191	West Somerset
E07000201	Forest Heath
E07000204	St Edmundsbury

Notes:

- 1. Plan numbers are for the local planning authorities that relate to the local authority areas I
- 2. Where a number of LA/LAs within a newly re-organised authority are part of a joint plan, a
- 3. Where a indicative result of "-" has been noted, the data does not allow for a calculation to
- 4. Where joint plans annual requirement figures are not able to split between authorities or v
- 5. A total London number is provided as it is for the Mayor to allocate need within London. Fc

Sources:

- 1. 2019 Affordability Ratio; House price to workplace-based earnings ratio, ONS
- 2. 2014-Based Household Projection, MHCLG
- 3. 2019 Mid-Year Population Estimates, ONS
- 4. ONS Major Towns and Cities, ONS
- 5. Local Plans Data, MHCLG

Contact:

planningpolicy@communities.gov.uk

considered as definitive for local planning decision or plan making as the inputs to the standard method are variable a

Indicative Local Housing Need (December 2020) 1,368 1,398 1,001 1,305 4,829 Refer to corresponding re-organised authority 2,300 1,247 3,196 Refer to corresponding joint plan

1,120 2,386

1,105

1,068

Refer to corresponding joint plan

2,820

1,266

2,325

1,189

Refer to corresponding joint plan

1,145

1,078

1,023

Refer to corresponding re-organised authority

CEE

-

1,666

3,763

2,341

Refer to corresponding joint plan

2,103

1,186

Refer to corresponding joint plan

3,527

1,662

1,114 1,806 1,399 Refer to corresponding joint plan Refer to corresponding re-organised authority Refer to corresponding joint plan 1,365 1,288 Refer to corresponding joint plan 1,551 Refer to corresponding joint plan Refer to corresponding re-organised authority Refer to corresponding re-organised authority

1,038 1,030

1,344 1,488 2,877 1,177 1,085 1,412 Refer to corresponding joint plan Refer to corresponding joint plan 1,353 1,181 Refer to corresponding re-organised authority 1,079 Refer to corresponding re-organised authority

Refer to corresponding re-organised authority

1,085

1,147

Refer to corresponding joint plan

1,369

Refer to corresponding re-organised authority

1,225

Refer to corresponding joint plan

Refer to corresponding joint plan

Refer to corresponding joint plan

Refer to corresponding re-organised authority

Refer to corresponding joint plan

2,006

1,013

Refer to corresponding joint plan

Refer to corresponding joint plan

Indicative Local Housing Need (December 2020)

2,983

5,361

2,394

3,574

1,211

2,117

154

3,109

3,188

4,397

4,408 2,514

1,736

2,495

2,538

2,579

3,651

1,554

3,117

1,347

2,038

2,259 4,178

2,051

4,882

2,122

595

4,453

807

6,190

3,206

3,425

2,946

93,579

Indicative Local Housing Need (December 2020)

2,008

806

1,086

756

800

1,263

1,517

Indicative Local Housing Need (December 2020)

Refer to corresponding re-organised predecessor authorities Refer to corresponding re-organised predecessor authorities Refer to corresponding re-organised predecessor authorities Refer to corresponding predecessor authorities and/or joint plan Refer to corresponding predecessor authorities and/or joint plan

Indicative Local Housing Need (December 2020)

1,459

353

823

177

512

361

596

94

362

452

isted, but exclude the plans of National Parks, the Broads Authority and Development Corporations with plan-making phousing need figure is given at a joint plan level. The remaining predecessor authorities are given a need figure at their be completed.

where the authorities within the joint plan have requested to be treated together (through HDT delta returns) a joint in or the purpose of the Housing Delivery Test and 5 Years Land Supply individual local authority indicative numbers are p