

**West Lancashire Local Plan Review
Preferred Options (2012-2050)
Representation by CPRE Lancashire**



Planning Appraisal by Jackie Copley, MRTPI MA BA(Hons) PgCert

Demographic Appraisal by Piers Elias, BA (Hons)

December 2018

CONTENTS

Section 1.Context

Section 2.National Legislation, Regulations, Policy and Guidance

Section 3.Critical Review of the Evidence Base

Section 4.Comments on the Preferred Options

Section 5.Conclusions and Recommendations

APPENDICES

1.0 Demographic Appraisal

2.0 Professional Qualifications and Experience

Section 1.Context

Introduction to CPRE Lancashire

1. The Lancashire Branch of the Campaign to Protect Rural England (CPRE Lancashire) is a leading, local, countryside charity that has been standing up for rural areas for more than 80 years. We have had remarkable success, helping to protect ordinary countryside as well as protecting the special landscapes of the Forest of Bowland and Arnsdale and Silverdale Areas of Outstanding Natural Beauty, and important Green Belts around our towns and cities.
2. We believe that a beautiful, thriving countryside is important for everyone, no matter where they live. Millions of town and city dwellers recharge their batteries with a walk or a bike ride in the local Green Belt, spend weekends and holidays in the countryside, or enjoy fresh local produce. People who live in rural areas keep our countryside beautiful and productive. We want the countryside to be inclusive, and accessible to all, for the benefit of everyone in the future.
3. The countryside is unique, essential, precious and finite - and it's in danger. Every year, a little more is lost forever to urban sprawl, new roads, housing and other developments. Rural shops and services are closing, and increasingly intensive farming is changing the character of the countryside. Climate change, too, will have serious implications for the way we all have to plan in the future, especially in rural environments.
4. Despite comments to the contrary (usually by developer lobbyists), we are not NIMBYs; our membership shares a love of the great outdoors. So yes, we do urge politicians and planners for positive progress. and protection for Lancashire's rural areas in the future. But we are really, local plan enthusiasts, as we agree that plan-led development is the best way to achieve sustainable development, and best protect rural places, but only if the policies and land allocations are sound, because they are based on robust evidence and logical analysis.
5. CPRE Lancashire focuses on the following five themes:
 - I. Countryside (rural landscape protection, tranquillity, promoting green infrastructure - trees, hedgerows, ecosystems, footpaths, light pollution etc)
 - II. Food and Farming (ensuring local produce and rural jobs, including in the visitor economy are supported through local plan policies)
 - III. Housing and Planning (ensuring the right type of housing is planned in the right places, with respect for Green Belt boundaries)
 - IV. Transport (promoting sustainable transport modes, particularly public services to keep unsustainable commuting to a minimum)
 - V. Energy and Waste (contributing to energy security through cleaner technologies and minimising waste, and by reduce, reuse and recycling of materials).

The Local Plan Review - Preferred Options

6. West Lancashire borough is predominantly rural. It has towns that need a boost. But most significantly it is a place of beautiful and tranquil countryside areas, providing valuable space for crop growing on some of England's most fertile land. It is identified by Natural England as within Natural Character Profile Area (NCPA) 32: Lancashire and Amounderness Plain. It has ecology of note and numerous nature reserves so it is important that the Preferred Options protect these natural assets. The people of West Lancashire enjoy the rural character of the place and want to help shape the future of the borough.
7. The publication of the Preferred Options resulted in CPRE Lancashire receiving an unprecedented surge in enquiries from local people with serious concerns that the Preferred Options are excessive, unjust, and potentially harmful. Consequently, we have considered the details of the consultation document and supporting evidence base in considerable detail. Everyone wants West Lancashire's economy, environment and people's health and well-being to prosper in the future, however the Preferred Options, are likely to be counter-productive, indeed damaging to the Borough's vision and strategic aims.
8. The parish councils and residents groups concern is so great that they helped co-fund a study by Piers Elias who is an independent expert demographer (President, British Society for Population Studies) in order to check the robustness of the housing evidence base. The finding of this review is that for multiple reasons the housing evidence is flawed, and too many houses are planned. This will lead to over-planning with needless harm to countryside land. Therefore it is recommended that the number of houses to be planned be reduced significantly. The Demographic Appraisal is at Appendix 1.0.
9. In this representation, we evidence that the estimate of job growth in the borough specified in the consultation document is excessive, resulting in a corresponding unnecessary allocation of employment land and an unnecessary uplift housing numbers.
10. We show that the large scale of Green Belt land proposed for release is unjustified. The Preferred Options will not support the borough's vision or ten strategic objectives by promoting such unsustainable development.
11. In terms of legislation, National Planning Policy Framework and National Planning Practice Guidance (PPG) the Preferred Options fail. The Council will not be able to meet the strict Housing Delivery Tests imposed by Government if it over-plans for housing. The development industry simply does not have the capacity to build so many houses.
12. Despite being very disappointed by the Preferred Option document, we have encouraged local people to engage with the consultation in a constructive way, and genuinely hope the consultation leads to an improved version. Local people deserve to be listened to when their surroundings are being planned.

Section 2. National Legislation, Regulations, Policy and Guidance

Planning and Compulsory Purchase Act 2004

13. In drafting the Preferred Options, the Council must have due regard to *The Planning and Compulsory Purchase Act 2004*, which places the duty on local planning authorities to prepare development plan documents (also known as the local plan). In particular, we draw attention to Section 13 relating to the need to keep an up to date evidence base, and Section 19, detailing the process required in the preparation of local plan documents.
14. In addition, Sections 20 to 23 relate to the examination of local development documents through to adoption, to be addressed at later stages of the local plan process.

The Town and Country Planning (Local Planning) (England) Regulations 2012

15. The regulations governing Local Plans are contained in The Town and Country Planning (Local Planning) (England) Regulations 2012 (the Regulations). The Regulations set out the duty to cooperate, the form and content of local plans, public participation, local plan preparation, independent examination through to document adoption. The Council must have due regard to the content and requirements laid out within the Regulations in the preparation of the Preferred Options.

The National Planning Policy Framework

16. The Government sets out its requirements of local planning authorities with regard to local plan making in the revised version National Planning Policy Framework, July 2018 (NPPF, 2018). The NPPF, 2018 (Paragraph 15) reiterates that “The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area, providing a framework for addressing housing needs and other economic, social and environmental priorities, and a platform for local people to shape their surroundings”. The NPPF, 2018 (Paragraph 22) states that the timescale for local plans must look ahead at least 15 years.
17. The Preferred Options must be considered against NPPF, 2018 and not the original NPPF, 2012 which was in force when the local plan team progressed the Preferred Options. Although much of national policy has remained the same, such as local plans being the bedrock for decision taking, there are some policy changes relevant to the Preferred Options, such as:
 - making changes to Green Belt boundaries is more difficult;
 - ancient woodland and veteran trees are better protected;
 - countryside has a heightened environmental role, as well as for its intrinsic beauty;
 - there is greater emphasis on well-designed development; and,
 - a new section on making better use of land is included.
18. The NPPF, 2018 gives design central importance to planning, not just for buildings but also for settlements. There is also an emphasis on making better use of previously developed/brownfield land. This valuable, but underused land resource should be prioritised for development in advance of farm fields or wildlife habitat.

19. The overall principle of the planning system is that development should be plan-led and be informed by up to date evidence. Below is a concise summary of the Sections of the NPPF, 2018 of importance to the West Lancashire local plan, with text underlined to add emphasis.
20. The objective of sustainable development can be summarised as “meeting the needs of the present without compromising the ability of future generations to meet their own needs”. For plan-making this means that:
- a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
 - b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas⁵, unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area(Footnote 6 explains the restrictions); or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
21. The ‘unless’ at the end of NPPF. 2018 Paragraph 11, bullet b) is of considerable note for West Lancashire, as in combination with NPPF, 2018 Footnote 6, it is particular potent as much of the high grade farmland in open countryside in West Lancashire Borough is protected by Green Belt designation. Harm to Green Belt purpose, which is a nationally significant issue arises from the Preferred Options wholesale approach to Green Belt release. It is doubtful that exceptional circumstances for release of Green Belt exist due to the flaws in the evidence base, see below. Furthermore, the enhanced protection afforded to the ancient woodland and veteran trees by the NPPF, 2018 needs to be reflected in the Preferred Options.
22. In Preferred Option Paragraph 1.13 the Council also acknowledges that the local plan should meet its objectively assessed need unless there are over-riding adverse impacts of doing so.
23. At examination, an independent planning inspector will assess whether the local plan has been prepared in accordance with legal and procedural requirements, and whether it is sound. Plans are ‘sound’ if they are:
- a) **Positively prepared** -as a minimum the local plan should seek to meet its objectively assessed needs; unmet need from neighbouring areas can only be planned where it is practical to do so and is consistent with achieving sustainable development;
 - b) **Justified** - the local plan must contain an appropriate strategy, taking into account the reasonable alternatives, and be based on proportionate evidence;
 - c) **Effective** - the policies must be deliverable over the plan period, and based on effective joint working; and

d) **Consistent with national policy** - enabling the delivery of sustainable development in accordance with the policies in the NPPF, 2018.

24. These tests of soundness will be applied taking into account the extent to which they are consistent with relevant strategic policies for the area.
25. The NPPF, 2018 Section 3 sets out how plan making should be done, how strategic policies should set out the overall pattern, scale and quality of development and make sufficient provision for housing, employment and other land uses, with adequate supporting infrastructure for transport, waste, flood risk, community facilities. Importantly, how plan making should have strategic policies for the conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation is also included.
26. Section 5 of the NPPF, 2018 sets out how the Council must deliver a sufficient supply of homes. CPRE Lancashire agrees the local plan should identify enough land for housing over the life time of the plan. A new Housing Delivery Test was introduced by the Government when it revised the NPPF, 2018. For this reason it is important that there is a reasonable prospect that the number of houses being planned can be delivered, otherwise there are harmful consequences, such as the Council losing control over its development control function, as decisions are decided at costly appeals. This could cause even more threats to West Lancashire's countryside through sporadic and unsustainable development. It is crucial that the housing requirement identified in the Preferred Options is proportionate.
27. The Government is holding a consultation to see if it should use out of date 2014-based household growth figures or updated 2016-based household projections based on a more robust method and data analysis. We have responded to say that while the Government is entitled to its policy of growth, but it should adhere to the principle that decisions and policy must be founded on the most up to date data.
28. Section 6 of NPPF, 2018 sets out how Councils should plan for a competitive economy. Paragraph 83 sets out how planning policies and decisions should enable:
 - a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;
 - b) the development and diversification of agricultural and other land-based rural businesses;
 - c) sustainable rural tourism and leisure developments which respect the character of the countryside; and
 - d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.
29. Section 7 of NPPF, 2018 states how planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.

30. Section 8 of NPPF, 2018 sets out policy for healthy and safe communities. Paragraph 93 states “Planning policies and decisions should consider the social, economic and environmental benefits of estate regeneration. Local planning authorities should use their planning powers to help deliver estate regeneration to a high standard.”
31. Section 9 of NPPF, 2018 sets out how Councils should promote sustainable transport. The Preferred Options lacks policies that get to grips with this issue.
32. Section 11 of NPPF, 2018 relates to making effective use of land. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed or ‘brownfield’ land. The Brownfield Registers need to be used in a way to ensure all sites can have a prospect of being reused in the future.
33. Section 12 of NPPF, 2018 is concerned with achieving well-designed places. Paragraph 127, states that “planning policies and decisions should, among other things, ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting; and create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.
34. Section 13 of NPPF, 2018 states how Councils should protect Green Belt land. The Government attaches great importance to them. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The five planning purposes are:
- a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns; and
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
35. Once the general extent of Green Belt is established, Councils can only alter it if exceptional circumstances are demonstrated. The NPPF, 2018 makes it much more difficult for Councils to erode Green Belt boundaries during local plan making. This part of national planning policy is most important for West Lancashire due to the importance of Green Belt planning designation that requires adherence to the five purposes outlined above. Green Belt should be viewed as a valuable asset locally with beneficial impacts for the people of the area.
36. Section 14 of NPPF, 2018 sets out national planning policy for meeting the challenge of climate change. Every day, new evidence is emerging from reputable organisations on the urgent need to alter the way we use our natural resources, and proper planning is crucially important to the support of sustainable development and affects the way land is used. The problem of flooding must be properly planned out, and mitigated so places will be more resilient in the future.

37. Section 15 of NPPF, 2018 sets out the policy for conserving the natural environment and is of particular relevance to West Lancashire given it is predominantly rural and has natural assets to conserve. NPPF, 2018 Paragraph 170 says “planning policies and decisions should contribute to and enhance the natural and local environment by, among other things, a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan); and b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services - including the economic and other benefits to the best and most versatile agricultural land, and of trees and woodland”. Now countryside is also recognised as having an environmental role.
38. In addition to the NPPF, 2018, the Government also recently published a consultation on proposals to mandate that development must deliver biodiversity net gain. It is their first action in its *25 Year Plan to Improve the Environment*, committed to embedding net gain principles in the planning system. It is very important that biodiversity net gain is achieved by the Council’s local plan.

National Planning Practice Guidance

39. The Preferred Options need to reflect Planning Practice Guidance (PPG) for Local Plans as revised September 2018.

What should a Local Plan contain?

40. PPG states that the Local Plan should make clear what is intended to happen in the area over the life of the plan, where and when this will occur and how it will be delivered. This can be done by setting out broad locations and specific allocations of land for different purposes; through designations showing areas where particular opportunities or considerations apply (such as protected habitats); and through criteria-based policies to be taken into account when considering development.
41. A policies map must illustrate geographically the application of policies in a development plan. The policies map may be supported by such other information as the Local Planning Authority sees fit to best explain the spatial application of development plan policies.
42. Local Plans should recognise the contribution that neighbourhood plans can make in planning to meet development and infrastructure needs. The Preferred Options should do more to embrace neighbourhood planning to support rural communities in the future.

How should local planning authorities express the need for different types of housing in their Local Plan?

43. Local planning authorities should ensure that the policies in their Local Plan recognise the diverse types of housing needed in their area and, where appropriate, identify specific sites for all types of housing to meet their anticipated housing requirement. This could include sites for older people’s housing including accessible mainstream housing such as bungalows

and step-free apartments, sheltered or extra care housing, retirement housing and residential care homes.

A Green Future: Our 25 Year Plan to Improve the Environment (2018)

44. A material consideration is the DEFRA: *A Green Future: Our 25 Year Plan to Improve the Environment (2018)*. Planning decisions should work on the principle of leaving our environment in a better state from then we found it. Therefore developments must contribute net gains for the environment.

Climate Change Act 2008

45. The Government has taken a number of steps to limit the UK's emissions of greenhouse gases through legally binding targets, both now and in the future. The Climate Change Act 2008 sets the framework for how the UK will manage and respond to the threat of climate change. It includes:
- 2050 Target - committing the UK to reducing total greenhouse gas (GHG) emissions by at least 80% in 2050 from 1990 levels.
 - Carbon Budgets - limits on the total amount of GHG emissions the UK should emit for specified 5-year periods as advised by the independent Parliamentary Committee on Climate Change and with which the government has promised to comply.
46. West Lancashire Borough Council is required by law to plan for reduced GHG emissions by 80% in 2050. The Preferred Options must accord with this and plan in a sustainable way, embracing good practices for a low carbon future.

Section 3. Critical Review of the Evidence Base

47. To understand how the Preferred Options land use policies and land allocations have been derived we have considered the most important documents that form the evidence base.
48. The purpose of this section is to validate whether up to date data, realistic assumptions for the modelling, and the most probable scenarios are relied upon. The analysis must be found to be intelligent, and use the robust data in a way that interprets the local issues properly for the Local Plan in a meaningful way, in the context of national legislation, regulations, policy and guidance.
49. We set out our findings in the critical review below.

Liverpool City Region Strategic Housing and Employment Land Assessment (SHELMA)

50. The SHELMA is an important document as it has a fundamental role in determining the development plans of the six constituent local planning authorities, namely Halton, Knowsley, Liverpool, Sefton, St. Helens and Wirral.
51. An important point is that the SHELMA document produced by GL Hearn is yet to be finalised, or independently tested at examination. The SHELMA is currently out of date and it is being reviewed in light of significant Government changes to the method of estimating housing need, and the publication of the Office of National Statistics 2016-based household formation rates, which show growth rates have slowed significantly, but which again the ONS has under review.
52. The SHELMA was also flawed. It lacked economic and demographic modelling to adequately identify realistic future needs for employment and housing needs. It merely reported on what had happened previously, and subsequently pushed the trends forward. In doing so, it ignored the reality of market fluctuations, and the development of a greatly expanded Capacity at the Port of Liverpool. Such key issues need to be anticipated more precisely in the short, medium and long term. It is therefore unsafe to plan on the basis of the SHELMA, which should be afforded limited planning weight.
53. We ask therefore, where are the people coming from to live in the new houses and take up the jobs? This is a serious question for the Council when progressing its planning policy for land use and allocating sites. There is no additional source of people identified.
54. We made the case to Liverpool Combined Authority that urban sprawl into West Lancashire is unjustified, and that urban concentration should be the focus of the forthcoming Liverpool City Region's Spatial Development Strategy to effectively steer sustainable development.
55. West Lancashire is not a constituent authority of the Combined Authority, yet it was identified for urban growth. The SHELMA plans for growth in all areas of the Liverpool City Region. The same is true for Greater Manchester and all geographies in the North, Midlands and South of the country. The question is how can all places grow simultaneously,

unless there is going to be mass immigration? Brexiteers intended to curb immigration from Europe.

56. The City Region, and wider North West area, has significant brownfield land resources existing in a vacant and underused condition. Encouraging the more effective use of previously developed land is NPPF, 2018 policy compliant. It represents a win/win for the communities brownfield sites blight, and the rural communities that would struggle to cope with additional urban sprawl. For full details please refer to the representation at the following link: www.cprelancashire.org.uk/news/current-news/item/2464-strategic-plans-for-liverpool-city-region-engulfs-west-lancashire-and-threatens-preventable-countryside-loss?highlight=WyJzaGVsbWEiXQ==

Economy Thematic Spatial Evidence Paper (2017)

57. It is noted that the economic thematic spatial evidence paper (2017) refers to a wide range of evidence sources. It sets out a current baseline, and sets out a future baseline with issues for the local plan.
58. It was found that the analysis presented is weak, based on an overly simplistic ‘predict and provide’ approach to predict future economic land use needs and other local plan issues. This approach would not stand up to scrutiny at an examination. The result is an excessive amount of employment land being identified as ‘needed’ over the plan period based on overly optimistic growth predictions.
59. There are a number of examples to show how poor the evidence base is for the economy. In overview, at all stages of the process, the economic land requirements are adjusted upwards, with more jobs added, for erroneous reasons, than can reasonably be filled by local people. Significant uncertainties, associated with ongoing global economic recession, and market instability due to Brexit, do make economic predictions more difficult than usual. However the economic projections rely on unjustified and unrealistic aspirations concerning job growth numbers on a ridiculous scale. Consequently the evidence base is gravely flawed.
60. We note that more women are employed than men, but self-employment by women is very low and that unemployment is focused in Skelmersdale, and in some northern rural areas. Compared to the North West, and nationally, the borough’s jobs per unemployed person is low, but there are still four jobs seekers per unfilled vacancy.
61. The Preferred Options should consider more work space for new start businesses and look at boosting jobs in Skelmersdale suited to the people who are out of work, and appropriate types of jobs in rural areas to boost the rural economy.
62. The Government’s definition of benefit claimants includes carers, those claiming disability and incapacity benefit, income support, pension credit, job seeker’s allowance and severe disablement allowance. The percentage of claimants across the borough between 2005 and 2007 remained relatively static. A higher proportion of residents within Skelmersdale and Up Holland claim Job Seekers Allowance than other parts of the borough. New jobs need to

be created in Skelmersdale, but until educational attainment and enrolment on training courses improves, the jobs will need to be low skilled to match the skill set of people out of work. Carers and those with incapacity cannot work.

63. Excessive numbers of future jobs are planned on the basis of flawed evidence. An obvious question is: *if the jobs are created at the excessive volume suggested, how will they be filled?* Recruitment is already a problem due to labour supply constraints, there are four job vacancy per JSA claimant as it is. Across the Liverpool City Region there are major economic developments in the pipeline, such as Liverpool 2, which will attract significant investment. The local plan should look at ways of connecting local unemployed people with these jobs. The lack of a train station in Skelmersdale is a problem as is the lack of other public transport, low car ownership and rural isolation means people of West Lancashire will struggle to connect with these jobs.
64. The largest occupational sector is professional, second is elementary occupations and then admin and secretarial. The public sector accounts for a large proportion of employment. The economic paper's Table 3.6 shows the breakdown of occupations by different parts of the borough. As expected, the largest proportion of employees from most occupations come from Skelmersdale and Ormskirk, and two thirds of those people who have never worked or are long term unemployed reside in Skelmersdale.
65. More than 40% of students live in Ormskirk, which is unsurprising as this is the location of Edge Hill University. Contrary to the economic paper, and other economic evidence base documents, gross student numbers at Edge Hill University have reduced, year on year. Full time places have increased, but the net number has fallen, as enrolment on short term courses has plummeted, a trend attributed to the introduction of university fees. This ought to be recognised in land use planning policies. It cannot be said the University is growing.
66. International migrants play an important role in the rural workforce, and surveys have shown migrant workers have a positive effect of responding to labour demands as required. It is likely Brexit will cause a significant gap in the number of flexible farm workers and the impact on farm businesses is yet to be fully understood.
67. The biggest job change has been a substantial decline in wholesale, retail and repairs, followed by jobs in energy, water and mining. Growth has occurred in accommodation and food services, then health and professional, science and tech, so the economic paper states these are the predicted growth sectors. More decline is anticipated in manufacturing.
68. It would appear counter-productive, therefore, to rely on further wholesale and retail in the form of more large scale B8, at the expense of prime agricultural land, supplying local food and drink businesses, which are in an identified growth sector. Introducing many more distribution jobs could suck away employees from established agriculture businesses, with negative impacts to operations at busy times, and associated impacts to the companies on the upward chain such as food processing, and food and drink sector

69. As a rural borough there is a lower job density, than elsewhere in North West, and nationally. The West Lancashire Rural Economy Study identified that more than half the companies, 40% of the jobs, and higher business start-ups are in rural areas. Agriculture, horticulture, and food and drink sector are recognised as important economic sectors. Skills and labour supply deficiencies were identified as problematic. Prime farm land is a valuable asset to the rural economy and must not be lost on account of flawed analysis.
70. It is recommended that Best and Most Versatile (particularly Grade 1, 2, and possibly 3a) land should be expressly protected. It is a national asset and it ought not to be undervalued for short term profit, and the long term economic harm should not be underestimated.

Summary of the Demographic Appraisal

71. It was considered that an independent demographic review was required to check whether the Council's Objectively Assessed Housing Need (OAHN) evidence base is fit for purpose and to better inform us when responding to the Preferred Options consultation. Therefore, the Demographic Appraisal, located in Appendix 1.0, was commissioned by CPRE Lancashire and co-funded by local parish councils.
72. The report is comprehensive and considers all aspects of the Housing and Economic Development Needs Assessment 2017 (HEDNA) and the West Lancashire Housing Growth Scenarios 2017 report builds on the findings of the HEDNA. We hope the Demographic Appraisal will be accepted as a constructive piece of expert evidence and utilised by Council planners when progressing the local plan. The HEDNA was produced by GL Hearn who produced the Liverpool City Region SHELMA.
73. The first part of the report (Chapters 4 to 8) looks at the demographic trends that feed into the OAHN and considers how the latest estimates and projections, from both the Office for National Statistics (ONS) and the Ministry for Housing Communities and Local Government (MHCLG), have impacted on the projections in the HEDNA Report (published March 2017) in terms of OAHN. These were originally based on 2014 based estimates and projections (published June 2015 and May 2016 respectively) but have been updated with data from ONS' 2015 Mid Year estimates (published in June 2016).
74. The second part of the report (Chapters 9 to 13) looks at how the housing target is built up, at the jobs led projections which were provided by Oxford Economics and at the longer term plans from the West Lancashire Local Plan Review Technical Paper 1: Strategic Development Options and Site Allocations, September 2018 .
75. The key recommendations, as shown in Appendix 1.0, Section 3, are as follows:
- Counter to Core Conclusion 4, headship rates should not be uplifted and the OAHN adjusted accordingly
 - The evidence provided for a market signals uplift of 10% is weak and should not be applied. The OAHN should be downward adjusted accordingly.

- Until the numbers of new jobs can be validated and shown to fit in with the projections for population and dwellings then the uplift for the economic growth part of the OAHN should be discounted; Oxford Economics jobs growth numbers need to be tested in POPGROUP or other projection software to assess plausibility and consistency across population and dwelling changes. The levels of new job growth are not consistent with population and dwelling change.
- Reducing unemployment rates is a very sustainable way to improve the local economy without any additional infrastructure and should be a policy considered as part of the planning process.
- It finds the OAHN is in fact 175 dwellings per annum.
- Reducing vacancy rates further should be part of local housing policy as it uses existing housing and reduces the need for developing on Greenfield sites.

76. The Demographic Appraisal demonstrates clearly where the evidence base is flawed and why the housing numbers need to be substantially reduced.

77. Therefore the Council is in a position where it must reduce its housing requirement.

Duty to Co-operate Statement, September 2018

78. The Duty to Cooperate Statement captures conversations in officer's meetings concerning cross border issues. CPRE Lancashire queries the level of delegated authority to the officers involved as they appear to take important decisions about strategic development principles.

79. We advocate key decisions should be influenced by the public, through the democratic process, and via their local politicians to agree on important matters such as whether West Lancashire will meet a neighbouring borough's unmet housing need leading to large-scale Green Belt release.

80. Some of the evidence base was jointly commissioned. Some of it dated. For example, a Green Belt Study, 2011/12 is referenced.

81. The SHELMA is a significant document relied upon by the duty to co-operate statement. As mentioned this is flawed, and subject to a review.

Technical Paper 1.Strategic Development Options for Site Allocations.

82. The development requirements identified in paragraph 2.1 are an inefficient use of land, contrary to NPPF, 2018 as the development density identified for housing is only 25 dwelling per hectare, whereas 40 dwellings per hectare is standard.

83. This technical paper is too heavily reliant on the Liverpool City SHELMA, which we have shown is flawed. It finds the OAHN for West Lancashire is 241dpa. This is despite the technical paper in Paragraph 2.29 showing in a Table that the Ministry for Housing, Communities, Local Government (MHCLG) the local housing need for West Lancashire is 212 dwellings per annum (dpa) (September 2017).
84. We refer to the Demographic Appraisal contained in Appendix 1.0, which shows the objectively assessed housing need is in fact lower still, at 175 dwellings per annum. We recommend these figures are relied upon in the future.
85. The Demographic Appraisal Table 9.Housing Completions, Market Signals & Affordability and Specialist Housing Need Housing Completions, clearly shows the reality of housing completions in West Lancashire since 2001. Since 2008, annual completions have only ever exceeded the local plan target of 324 dwellings per annum in 2014, when 370 dwellings were completed. There are a number of reasons for this as highlighted in the Government's 2017 white paper: *fixing our broken housing market*.
86. The Letwin Review has recently reported on the slow progress of housing delivery of large sites, widely regarded as due to land banking practices of the housing industry. The Letwin report refers to market absorption rates being slow due to market saturation, and the speed at which developers are prepared to build. The Council has performed well concerning its five year housing land supply.
87. However, this good performance will not perpetuate in the future, if the Council sets a housing requirement that is too high. It will not be able to demonstrate enough completed houses, and in effect it will be set up to fail. When authorities fail the five year housing land supply, it is their communities who are penalised. Further greenfield land, never intended for development is lost to developers. It is a vicious circle and the Council should not fall into the trap. Please see our research report: Set Up to Fail: Why housing targets based on flawed numbers threaten our countryside
<https://www.cpre.org.uk/resources/housing-and-planning/housing/item/4158-set-up-to-fail-why-housing-targets-based-on-flawed-numbers-threaten-our-countryside>
88. GL Hearn's conclusion that any provision of housing over and above that OAHN could be seen as meeting any unmet needs from other authorities, such as Sefton, is contrary to the NPPF, 2018 paragraph 11, Footnote 6, and is not based on fundamental principles that enables sustainable development (refer to Section 2, paragraphs 20 and 21 of this document).
89. It is not appropriate for a rural authority, with high grade farm land, ecology and Green Belt protections to take unmet need from a more urban neighbour, when these unmet needs have yet to be assessed, or identified. West Lancashire should enjoy some benefits of being located near to the Liverpool City Region, but ambition of the borough to draw an excessive amount of households and employees from more urban places, when it incurs large chunks of Green Belt release, is not compliant with the NPPF,2018 or no doubt the ambitions of Liverpool Combined Authority. The West Lancashire local plan should not inhibit the regeneration ambitions of places like Liverpool.

90. The technical paper offers the Rail Link as an ill-conceived enticement. It suggests that if the borough releases lots of high grade farmland in the specific location in Bickerstaffe owned by Knowsley Estate, it will get a rail link, but not otherwise. Of course there are other planning options that ought to be considered. The technical paper seems inappropriately balanced in favour of the land owning interest of the Knowsley Estate, rather than the community, in which some local people who will lose their homes and livelihoods. The negative impacts are not presented at all.
91. The reality is that Skelmersdale needs a rail link regardless. A rail link would help unemployed people better connect to the urban conurbation of the Liverpool City Region for employment. But, if new housing is to be delivered, it should support existing town centres, and not establish new ones. The additional uplift of 120 dwellings per year for a Skelmersdale Rail Link is not justified. Bickerstaffe is an unsustainable location for new housing.
92. The idea of the critical mass needed from the development is in part true. Any large site considered as a 'sustainable urban extension' should deliver necessary infrastructure and be master planned to ensure for high quality. Sustainable extension is usually land at the fringe, not in open countryside.
93. The uplifts leading to an OAHN of 421 dwellings per year, equates to 15,992 new homes over the period 2012-2050 is not justified. This figure must be revisited and reduced significantly.
94. The idea that all the development land will be immediately available is risky. Developers will cherry pick the most choice sites and it will cause viability issues. The Council needs a local plan that provides it with some development management control. The evidence base seems to assume that allocating much more land will reduce the price of land and therefore the unit cost of housing and impact on affordability. However, we can't emphasise enough how this is just not the case. This is because households live where they need to be, in a size of house suitable. That is why it is so important to properly evidence what type of housing is needed and where, using robust data and analysis.
95. The economic analysis of the employment land is flawed, and excessive, relying on assumed high growth, which is improbable. It will lead to disproportionate allocations and harm to best and most versatile farm land. The Knowsley Estate is not a suitable location for B8. B8 is identified in the economy paper as being a declining sector in West Lancashire.
96. The type of jobs being offered in large B8 facilities are subject to replacement by technology. The predicted job density for B8 warehousing for large scale distribution will be very low. The negative impacts of developing on productive farmland is not outweighed by the benefits of providing a distribution site, which leads to the import of more goods from overseas and only offers low density, low skilled types of jobs. There is no control over where the staff employed would live and it is likely many would be from outside the area. The predicted number of jobs created is grossly exaggerated.

97. There is already 67 hectares of land allocated for employment in the adopted local plan. On the basis of take up data, other market intelligence, and more proportionate growth applied we believe no further employment land is required at the current time. We would recommend this situation is reviewed every five years.

Habitats Regulations Assessment

98. The Habitats Regulation Assessment (HRA) looks at the likely effects of the Local Plan on designated nature conservation sites within and close to West Lancashire.
99. CPRE Lancashire is an advocate of HRAs to ensure environmental impacts are understood, particularly on designated nature sites so they may be adequately protected.

Strategic Flood Risk Assessment

100. A Strategic Flood Risk Assessment (SFRA) assesses the risk to an area from flooding from all sources (river and coastal, surface), now and in the future. It takes account of the impacts of climate change and assesses the impact that land use changes and development in the area will have on flood risk. A 'Level 1' SFRA looks at flood risk in more general terms. A 'Level 2' SFRA looks at site-specific matters.
101. West Lancashire has particular issues relating to the artificial drainage of land. The Environment Agency has served notice to stop pumping the water, which would lead to flooding of best and most versatile land. Perhaps the local plan can identify a mechanism for a partnership approach to this problem. Building in the floodplain is not a good idea.

Ecological Networks

102. Ecological networks are a series of sites located across a district that enable wildlife to move safely from one place to another, for example to forage. It is hope the local plan supports an enhanced and expanded ecological network for the benefit of wildlife and biodiversity in the future.

Summary

103. Broadly speaking, the evidence base is inaccurate, leading to inflated development quantum being identified as 'needed'. The outcomes of the Duty to Co-operate must be intensely scrutinised. The Council must review its evidence base documents underpinning economic and housing requirements. Local plan policies for land use and site allocation are so important that they must be informed by trusted evidence.

Section 4. Comments on the Preferred Options

104. On the basis of our findings set out in Section 3 concerning the flawed evidence base, we are genuinely sceptical as to the merits of some of the local plan policies and allocations that follow, particularly SP2 and SP7. These are the policy aspects that most angered local residents and parish councils. However, in the spirit of being positive and constructive, we provide comments on relevant policies below.
105. The Council acknowledges in Paragraph 1.5 of the Preferred Options that the West Lancashire Local Plan 2012-2027 is not out of date. Therefore, a key question is whether the Council is over-reaching its role by focusing on an unnecessary radical rewrite of the entire local plan rather than a simple early review of the current West Lancashire Local Plan 2012-2027, as recommended by the examiner at the examination. It is the opinion of a great many local people that the Council should have progressed a more straightforward review in line with expectations.

Key Issues

106. The main issues identified are broadly supported, as is the vision, and objectives.
107. Preferred Option Paragraph 1.9 encourages developers to promote their sites and make the case for the suitability of land to be delivered. A call for sites stage of a local plan is necessary, but filters should be applied by the planners to rank sites that are suitable from a sustainability, environmental/planning designation, ecology, local amenity, landscape impact, etc point of view. Otherwise, there will be adverse results of over allocating farmland for development, with the loss of farmland, related jobs and homes.

Chapter 3: Strategic Policies

108. As previously stated, the strategic policies are based on a flawed evidence base.
109. A map of the whole of the borough to give an appreciation of the location of strategic sites and proposed release of Green Belt across the whole area in relation to the public transport hubs would be helpful in the next version of the local plan.

Policy SP1: Delivering Sustainable Development

110. Please include what the specific policies referred to in NPPF, 2018 Footnote 7 are to aid the public to understand what is meant.
111. Please update the settlement hierarchy to show Skelmersdale and Up Holland not as Regional Towns, but as Borough Towns, or without a rail station, a Key Service Centre.

Policy SP2: Strategic Development Requirements

112. This policy of the Preferred Options has most angered local residents and parish councils and everyone comments that Policy SP2 is dangerous and it will cause much more harm, to the economic, social and environmental factors of West Lancashire, than deliver good. CPRE Lancashire believes it will undermine the borough's own housing and regeneration

ambitions, and those of Councils elsewhere in the Liverpool City Region. This issue must be revisited as it is unsustainable and is inconsistent with policies in the NPPF, 2018 when taken as a whole.

113. The local plan period is too long. Planning for a 32 year period is a highly risky strategy and it should not be allowed.
114. The NPPF, 2018 Paragraph 22 states “local plans should aim to be of a more manageable 15 year minimum duration”, so the Council more than doubling this period is outside reasonable interpretation of this specification. As the Demographic Appraisal confirms, it is impossible to meaningfully plan based on projections that will be way off reality, this far ahead (see Appendix 1.0). The projections cannot be relied upon due to margin of error implied. A more reasonable timeframe is a plan period running for 15 years to 2037.
115. The second policy aspect of SP2 that has most angered the public is that it proposes to take unmet need from Sefton a neighbouring area. Yet, evidence shows the links between Sefton and Liverpool are stronger than with West Lancashire. Furthermore, this is not a valid reason to trigger exceptional circumstance to require the release of land in Green Belt due to the alternative sites that exist across the Liverpool City Region area for unmet need, namely on the widespread brownfield sites, captured on Brownfield Registers. Incidentally, there is not a single mention of West Lancashire’s brownfield register in the whole of the Preferred Options document.
116. The quantum of housing is excessive based on flawed evidence and it is recommended that 175 dwelling per annum (dpa), plus buffer (20%) and backlog (20%) equal to 245dpa should be planned annually. Over 15 years this equates to 3,675 dwellings. It shows just how excessive and disproportionate the proposed +15,000 dwellings requirement is. In effect, 11,000 homes have been added due to uplift adjustments, which are shown to be invalid. See Appendix 1.0.
117. The more realistic figure has a reasonable prospect of being achieved during the plan period, and using an average build density of 40 dwellings per hectare as standard, requires less than 92 hectares of land for housing development over the plan period. It is important to identify the types of housing for local need and include smaller, affordable and homes suitable for the elderly and disabled. The local plan must guard against the development of unaffordable larger homes.
118. Similarly, the employment land requirement of 190 hectares is excessive based on flawed thinking regarding growth, despite current economic uncertainties, and ungrounded analysis. Currently 67 hectares of employment land is allocated in the local plan and we think it should remain so in the future, distributed between B1, B2 and B8 uses. There is a negative impact in over-planning for employment use.
119. Accordingly, we set out a table of recommended housing and employment land requirements below.

Table of recommended proportions of development by area

	Housing dwellings	Employment hectares
Skelmersdale and Southern-Eastern Parishes	1,970	53
Ormskirk and Aughton	689	4
Burscough and Central Parishes	344	8
Northern Parishes	330	2
Western Parishes	212	-
Eastern Parishes	130	-
Total Requirement	3,675	67

120. We advocate effective cooperation between neighbouring authorities, but it should be in the spirit of enabling sustainable development, focused on urban concentration rather than countryside encroachment as this is proven to have a lower carbon per capita, which is much more socially responsible. We are troubled as to why this has happened in reverse and need to more clearly understand who decided to take unmet development need from Sefton, and why?

121. Allocating so much greenfield land for development all at once, without any use of phasing or safeguarding, is also deeply contentious. It is widely seen as based on flawed assumption that the affordability of development land and housing would be improved. The basic ‘supply and demand’ model does not apply to development land values and house prices. Releasing all land for development at once will remove the ability of the Council to appropriately manage housing development in the future, and more countryside locations will be threatened. A recent research report on housing affordability, shows that releasing Green Belt land does not in fact lead to lower house prices. It in fact leads to countryside loss, more deprivation in urban areas, and higher house prices.

<https://www.cpre.org.uk/media-centre/latest-news-releases/item/4785-rural-communities-denied-affordable-housing-as-developers-exploit-loophole?highlight=WyJzaGVsdGVyIiwic2hlbHRLcidzIl0=>

Policy SP3: Settlement Boundaries

122. CPRE Lancashire broadly agrees.

Policy SP4: Development in the Green Belt

123. CPRE Lancashire broadly agrees as development in the Green Belt is inappropriate. We suggest a tightening of the wording of the policy.

Policy SP5: Skelmersdale Town Centre

124. The Preferred Options fails to make the effective use of land as set out in NPPF, 2018 11.6. The urban sprawl and countryside encroachment into the rural hinterland undermines the role of town centres, in particular the role of Skelmersdale is not being fully supported by the Preferred Options this would be contrary to the policies set out in NPPF, 2018 Section 7.

125. New housing allocations should be focused on the existing town.

Policy SP7: The Creation of Garden Villages and Employment Areas to the west and south-west of Skelmersdale

126. CPRE Lancashire strongly objects to the proposal to create not one, but three, garden villages and employment areas in open countryside land, on prime farmland protected by Green Belt proposed under SP7. Exceptional circumstances do not exist to release land.

127. The people of Bickerstaffe live in a very rural place. Development here will negatively impact on people’s homes and livelihoods. We do not believe the development at the location is sustainable. There will be negative impacts that outweigh the benefits for local residents and business that are threatened in the area of Bickerstaffe. A better alternative is to focus sustainable urban extensions around the borough’s town centres, namely Skelmersdale.

128. All of the parish councillors, residents and residents group are united in their strong opposition and with CPRE Lancashire they will tenaciously defend the principle of development at the following sites:

- to the north of the A577 Dicket’s Lane / Blaguegate Lane (circa 1,500 dwellings);
- to the east of the B5240 Lyelake Lane (circa 2,500 dwellings); and
- to the north-east of the A570 Rainford Bypass (circa 2,000 dwellings).

Photo: land proposed for development at SP7. Beautiful prime farm land.



Policy SP8: Land to the south-east of Ormskirk and Aughton

129. Exceptional circumstances do not exist to release this land from Green Belt. CPRE Lancashire objects to the needless development of these sites:

- To the east of Alty’s Lane, Ormskirk (circa 400 dwellings);
- To the west of Alty’s Lane, Ormskirk (circa 700 dwellings);
- To the north-west of Parr’s Lane, Aughton (circa 400 dwellings); and
- To the south of Parr’s Lane, Aughton (circa 500 dwellings).

Photo: South of Parr's Lane, Aughton with a flock of geese grazing on the field.



130. The people of Aughton view themselves as living in a rural place and they want the local rural character to be retained in the future. The development sites proposed in Aughton will merge it together with Ormskirk and cause further rural encroachment. Local people are strongly opposed.
131. Contrary to Green Belt purpose the development of these sites would form almost 'ribbon development', which is precisely what it is intended to prohibit. The unnecessary release of land protected by Green Belt, which is safeguarded until 2027 should therefore be prohibited until other more sustainable locations are delivered.
132. Each site has particular issues, such as Red Squirrels at HO2 Ruff Wood, and consequently this may not be a suitable housing site. Other issues include the road capacity as it is already limited according to the local parish council and local residents. See further comments under housing policy H2.
133. At this location, new development will cause urban sprawl onto land to the south-east of Ormskirk and Aughton. CPRE Lancashire would like the need for more expansion at Edge Hill University to be robustly justified, given the trend over the past ten years for decline in student numbers.

Chapter 4: Economic Policies

134. CPRE Lancashire has shown the economic base is flawed.
135. We request a map of the whole of the borough to give an appreciation of the location of employment site distribution across the whole area in relation to the strategic road network and rail stations would be helpful in the next version of the local plan.

Policy EC1: Delivering New Employment Developments

136. The need for more B8 uses in West Lancashire should be properly evidenced. The location should if demonstrated as needed be on the strategic highway, but there are alternative locations that are not so prominent in the landscape and so rural in character. The built intrusion would be unacceptable, so CPRE Lancashire strongly objects to the Logistic Park at Junction 3 of the M58. The location is unsuitable for B8 use or any urbanising development. The need to release Green Belt land here has not been justified. The

impacts to the environment would be significant. The idea of a logistic park at this particular location should be abandoned.

Policy EC2: Managing Development on Existing Employment land

137. CPRE Lancashire broadly agrees.

138. There is believed to be planning oddities/history at the Simonswood Industrial Area. Landfilling is understood to have occurred despite the existence of a nature reserve on the site. We recommend that the matter is looked closely into by the planning department to ensure no breaches of planning or environmental regulations have taken place.

Policy EC3: The Rural and Visitor Economy

139. The Council has a prominent policy for the rural economy. It is recommended that the policy should recognise the value of all farmland for future agricultural use, especially that of Best and Most Versatile (Grades 1-3a) in accordance with NPPF, 2018 Paragraph 170 as it is an important source of local food and jobs, supporting a large number of businesses and crucial for the entire local economy. The policy wording needs to be tightened in order to be more effective, and so the Council is seen to recognise its economic, social and environmental value.

140. The borough's rural economic sectors contribute to that of the wider City Region's Gross Value Added. Given the uncertainties linked to Brexit, it is highly likely that food security, and local employment will be significant issues. If food prices rise, local businesses may grow, as in recent years the squeeze on prices by the large retailers have all but priced local farmers out of business. We hope the fortunes of farming is more prosperous in the future.

141. Whilst we want to support rural businesses, this does not have to be at the expense of urbanising the countryside. Where large premises are needed alternative sites should be identified where the landscape character is too negatively impacted. It is right that proposals for significant extensions to agricultural packing should not be permitted if the local landscape is adversely impacted.

Chapter 5: Housing Policies

142. The Demographic Appraisal looked at the housing evidence base in detail and presented relevant findings for use by the Council in the next stage of the process.

Policy H1: General Housing Policy

143. Land outside settlement boundaries should not usually be permitted for development. The Council should state in policy that it expects development to comply with the local plan policies and allocations. The Council should prohibit 'off-local plan' applications. This will reduce hope values and vexatious applications to develop land in rural places.

144. The density of housing should average at 40 dwellings per hectare. Density should be highest in town centres.

Policy H2: Housing Site Allocations

145. Some of the Preferred Options site allocations are just in the wrong locations and would lead to increased car based commuting, contrary to climate change commitments and the need to reduce our greenhouse gases. We discuss the general inappropriateness of the proposed housing allocations relating to SP7 and SP8 above, but include specific site commentary below. CPRE is also opposed to the development of the following (this list is not exhaustive):

HO1- Land at Ruff Lane -this site has red squirrels and therefore should not be developed.

HN1 - Alty Brickworks, Hesketh Bank below the high tide and therefore susceptible to flooding.

HN2 - Land West of Church Road, this site is being opposed by the Conservation Officer due to ecological issues.

HW2 - Fine Jane's Farm is liable to flooding and unsuitable.

HW4 - Southport Road, Scarisbrick has red squirrels and therefore should not be developed.

HE1- Lawrenson's Farm, Newburgh is a site used for wintering birds, especially geese and it should not be disturbed due to the harm to wildfowl and other ecology.

HSE15 - Glenside, Appley Bridge has significant ecology on the neighbouring nature reserve called Fairy Glen and it should not be developed for housing.

Photo: HSE15 Fairy Glen site is liable to flooding



HSE3 - Land east of Appley Lane is restricted due to the narrow country lane and we therefore object on highway grounds. (see photo below)



The Alternative Housing Site to the north of Aughton should not be developed as the separation from Ormskirk is impinged. And the Alternative Housing Sites in Halsall, and Haskayne should not come forward as they would over develop the hamlets.

Policy H3: Affordable Housing

146. CPRE objects to the private sector model of affordability as ‘starter homes’ are ultimately market homes, and they do not stay affordable once sold. CPRE recently teamed up with Shelter to consider the problem of not enough affordable homes being built.

<https://www.cpre.org.uk/resources/housing-and-planning/item/4781-viable-villages-closing-the-planning-loophole-that-undercuts-affordable-housing-in-the-countryside>

Policy H7: Accommodation for Temporary Agricultural / Horticultural Workers

147. CPRE Lancashire broadly agrees. The landscape character should be assessed. Materials and design should be sympathetic to blend in with traditional styles.

Policy H8: Viability Appraisals on Residential Developments

148. We have evidence to show that developers routinely renege on affordable housing contributions and affordable housing is not being delivered in rural places. In CPRE Lancashire’s view the Government has weakened the planning rules in this regard. Yet, there are policy references in NPPF, 2018 to say developers have to bring forward adequate community infrastructure and that is what must be captured in the local policy.

149. When brownfield land is developed or land in urban places, the infrastructure is already available. When sites in the countryside are developed new infrastructure has to be delivered and developers ought to cover the costs. The public otherwise has to pick up the bill.

Chapter 6: Infrastructure and Services Policies

Policy IF1: Strategic Transport Infrastructure

150. West Lancashire is poorly served by public transport. Train connections are comparatively poor and services are hindered by Northern Rail's infrequent timetables, and old rolling stock. Today Skelmersdale does not even have a rail station, as it was closed due to the Beeching Report. But, we think the reintroduction of a rail station is a fantastic idea, but the addition of a rail link in Skelmersdale will not make out-lying rural villages like Bickerstaffe better able to cope with additional housing numbers.
151. Bus services have been severely cut due to cuts to local authority budgets by Government. This has added to social isolation and rural deprivation. Developer contributions may be able to support more bus services.
152. Liverpool's Superport has a deficiency in its strategic rail connections making it an unsustainable development (London's Superport has 40% of goods transported by rail compares to Liverpool paltry 2%), overly reliant on using heavy goods vehicles (HGVs) to transport imported goods from the Far East and America into the country.
153. Most of Rural West Lancashire is served by narrow lanes, entirely unsuited to HGV traffic. Small rural villages like Rufford have HGV traffic travelling at high speed down lanes with carriage widths unable to cope. There needs to be a better hierarchy of roads, some for HGVs and quieter rural lanes for quiet enjoyment on foot and bicycle to promote tranquillity and pleasant rural recreation.
154. We understand British Sky Cycle Team trains on the flat rural roads of West Lancashire, along with thousands of road-bike enthusiasts who ride throughout the Borough.

Policy IF2: Community Facilities

155. It is most important that the level of development contributions is adequate enough to deliver needed community facilities. The local plan should ensure higher contributions in more affluent parts of the Borough, and adequate contributions elsewhere to ensure sufficient community infrastructure is delivered.
156. Land in countryside, if unavoidable, when developed should be charged a higher rate of Community Infrastructure Levy to cover the additional costs associated with developing land with no existing services.

Policy IF4: Low Carbon and Renewable Energy Development

157. In our view the Preferred Options fall short of NPPF, 2018 Section 14 and will promote unsustainable development by being too focused on building on greenfield land, mostly high grade agricultural land. This will be to grossly exacerbate climate change due to increased greenhouse gases associated with increased traffic in rural places.
158. The Preferred Options is terribly weak in this area, and it needs to mitigate the impacts of the way land is used in the future, in the first instance by limiting the amount of

countryside allowed for development. The over development of housing in greenfields will place a substantial burden on the area's flood resilience, particularly as there is an issue about pumping at Alt Crossens that remains unresolved as the Environment Agency will cease pumping flood water, with the negative impact of flooding high grade farmland.

Chapter 7: Green Infrastructure Policies

159. CPRE Lancashire is broadly supportive of all the policies that focus on protecting and enhancing green infrastructure across West Lancashire.

Policy GI1: Provision of Green Infrastructure

160. CPRE Lancashire is broadly supportive of this policy.

Policy GI2: Open Space and Outdoor Sports / Recreation Facilities

161. CPRE Lancashire is broadly supportive of this policy.

Policy GI3: Nature Conservation and Ecological Networks

162. The Council is committed to ensuring the protection of nature conservation sites when planning for the future which is a good thing. We agree that priority species and habitats need to be protected in the future.

Policy GI4: Trees, Woodland and Hedgerows

163. We trust the Council in progressing the Local Plan will recognise the natural capital value of woodland, the older the more valuable and irreplaceable, the benefits of hedgerows that are protected under the Hedgerow Regulations 1997. Please refer to the Hedgerow Regulations in the policy wording. Land owners need to understand it is an offence to destroy significant hedgerows. This will make it less likely that hedgerows are needlessly lost due to ignorance concerning the legislation.

Policy GI5: Landscape Character and Land Resources

164. Landscape character is an important factor when planning rural areas. In recent times CPRE Lancashire has produced a Landscape Character Assessment for Rufford Parish Council to help it protect its landscape character in the future. We hope this will help underpin a neighbourhood plan in the future.

Chapter 8: Sustainable Development and Design Policies

165. We broadly agree with the policies in Chapter 8.

Policy SD1: Designing Sustainable Layouts

166. Local Plans should recognise the contribution that Neighbourhood Plans can make in planning to make sustainable layouts.

167. CPRE believes that the Local Plan Review could do more to embrace neighbourhood plans and support more locally focused decision making by rural communities in the future.

Policy SD2: Sustainable Design

168. CPRE Lancashire broadly agrees with this policy.

Policy SD3: Preservation of Heritage Assets

169. CPRE Lancashire broadly agrees with this policy.

Policy SD4: Managing Flood Risk

170. CPRE Lancashire broadly agrees with this policy.

Policy SD5: Managing Contamination and Pollution

171. CPRE Lancashire broadly agrees with this policy.

Section 5 Conclusions & Recommendations

Conclusions

172. The overall principle of the planning system is that development should be plan-led and be informed by up to date evidence, which can stand up to scrutiny at examination, which currently the evidence base fails to do.
173. Based on flawed evidence, and unjust uplifts to housing and job numbers and excessive amount of employment and housing has been identified as needed. Consequently, too much greenfield land, especially Green Belt, is proposed for allocation,.
174. The negative impacts of over-planning jobs and housing is the unnecessary loss of land in the countryside, used for nature, wildlife and farming. It also will inhibit regeneration and development ambitions in the borough and neighbouring areas.
175. The process of the duty to cooperate needs to be revisited as there is no planning merit for a predominately rural borough to accept unmet housing from a more urban neighbour, particularly when the unmet need has not even been evidenced. If West Lancashire has unmet need perhaps an urban neighbour will be keen to help.
176. Local plan policies for land use and site allocation are so important that they must be informed by trusted evidence. This has resulted in a disjunct between what the Preferred Options says it wishes to deliver in the vision and strategic objectives, and then what the land use policies contain, and where the site allocations are identified.
177. There is no exceptional circumstance to justify the release of Green Belt. More, should, and could be done to reuse brownfield land and sites focused on existing settlements or to focus new development at existing settlements. Brownfield Registers should be mentioned in the evidence base, local plan policies and allocations.
178. Best and most versatile land (1-3a) is unnecessary at risk from development. There should be strong policy protection.
179. Local people are strongly opposed to the Preferred Options, particularly policies SP7: The Creation of Garden Villages and Employment Areas to the west and south-west of Skelmersdale; and SP8: Land to the south east of Ormskirk and Aughton. There is a commitment from local people and parish councils to defend against these allocations.
180. The benefits of neighbourhood planning is not particularly addressed.

Recommendations

181. CPRE Lancashire, parish councillors, local groups and local residents agree that 'enough needed' houses should be planned and built. But they want attention to be given to where is suitable and what type of homes to respond to future needs, specifically suited to the requirements of disadvantaged, young, old and disabled households.
182. The evidence base must be reviewed and made robust. The development quantum for housing and employment must be reduced to be proportionate and justified.
183. The Preferred Option policies and allocations need a radical refocus in order to be compliant with the NPPF, 2018 and so that the vision and strategic objectives of the Local Plan are properly supported by improved policies and allocations. There should be more of a brownfield land reuse focus and regeneration of existing settlements is required in advance of greenfield allocations. Nature conservation should be promoted more in the policies.
184. West Lancashire under its duty to cooperate should not accept unmet housing from urban neighbours, rather it should see if any of its unmet need, if evidenced, can be met by them. Due to the availability of brownfield land this may not be necessary.
185. More should be done to reuse brownfield land, with the introduction of a brownfield target, and using brownfield registers more effectively. Skelmersdale needs improved policy support in line with this.
186. Site allocations should reflect the vision and strategic objectives more fully, especially with regards to climate change, which needs to be more responsibly planned with real reductions in greenhouse gases, associated with urban focused development and much less greenfield development.
187. A stronger policy should protect best and most versatile land. There should be a presumption against development on prime farm land.
188. Land allocations under policies SP7, SP8, and other housing sites that suffer constraints, should be deleted in accordance with justified reason, including local opinion. The site suitability of future housing and employment land allocations needs further consideration.
189. More references to neighbourhood planning and the value of this local tier of planning policy protection for landscape character, promotion of good design, increasing green infrastructure and leading to more sustainable transport modes such as walking and cycling should be included in the local plan. Many parish councils may not realise they are able to decide how to spend a larger amount of Community Infrastructure Levy (25% as opposed to 15% with a made plan). CPRE Lancashire is keen to support parish councils progress neighbourhood plans.

APPENDICES

Appendix 1.0 Demographic Appraisal by Piers Elias.

The study was commissioned by CPRE Lancashire, but kindly funded by two West Lancashire residents groups and the following ten Parish Councils:

Aughton Parish Council

Bickerstaffe Parish Council

Burscough Parish Council

Dalton Parish Councils

Hesketh with-Becconsall Parish Council

Lathom South Parish Council

Newburgh Parish Council

Parbold Parish Council

Rufford Parish Council

Scarisbrick Parish Council

All of the above are opposed to needless countryside loss.

West Lancashire Local Plan Review - Housing and Economic Development Needs Assessment (HEDNA)

Demographic Appraisal

on behalf of the

Campaign to Protect Rural England, Lancashire

By Piers Elias

Independent Demographer

12 December, 2018

Table of Contents

[Chapter 1](#) - *Piers Elias - Personal Biography*

[Chapter 2](#) - *Introduction and Background to the Report*

[Chapter 3](#) - *Recommendations & Executive Summary*

[Chapter 4](#) - *2014 Based Projections and 2015 Mid Year Estimates*

[Chapter 5](#) - *Analysis of the Core Conclusions from the HEDNA*

[Chapter 6](#) - *Internal Migration - Moves within the UK*

[Chapter 7](#) - *Internal Moves - Migration within the UK - General Analysis*

[Chapter 8](#) - *International Migration - Moves to and from Outside the UK*

[Chapter 9](#) - *Housing Completions, Market Signals & Affordability and Specialist Housing Need*

[Chapter 10](#) - *Jobs Led Projections*

[Chapter 11](#) - *Objectively Assessed Housing Need (OAHN)*

[Chapter 12](#) - *Suggestions for alternative scenarios and double checking*

[Chapter 13](#) - *Longer term planning and Unmet need*

[Glossary](#)

1. *Piers Elias - Personal Biography*

- 1.1. Piers Elias has a joint honours degree in Mathematics and Economics (Loughborough, 1981-84) and has over 21 years' experience in Local Government working for the Tees Valley Joint Strategy Unit and then the Tees Valley Local Enterprise Partnership (now Tees Valley Combined Authority) providing demographic insight and projections for school rolls, electors for ward reviews, household, population and labour force projections for Local Plans and the Tees Valley Strategic Economic Strategy.
- 1.2. He currently works as an independent demographer providing advice and guidance on a range of demographic issues including projections and methodology - his website can be viewed [here](#)¹. He has an excellent working knowledge of the POPGROUP software, having been a user since 2006 and worked briefly for Edge Analytics, the current licence holder, in 2015.
- 1.3. During his time in Local Government he sat on Office for National Statistics (ONS) working groups for small area estimates, Local Authority population estimates and Census definitions. He was also the Local Authority lead on the Central and Local Information Partnership (CLIP) Population sub-group for 10 years and is well versed in ONS methodology.
- 1.4. He is a strong supporter of the Census and was the Local Authority representative for the Independent Working Group on the future of the Census² and also represented Local Government at a Public Administration Select Committee (PASC)³ and at a Parliamentary Office Science & Technology (POST) seminar⁴; this lobbying helped in securing funding for a 2021 Census. He sat on the Census Advisory Group as a Local Authority representative for six years.
- 1.5. He is currently President of the British Society for Population Studies and has recently been re-appointed to the CLIP Population sub-group, acting as an independent advisor. He also acts as non academic grants assessor for the Economic and Social Research Council.

[Contents](#)

2. *Introduction and Background to the Report*

- 2.1. This report is written on behalf of the Campaign to Protect Rural England (CPRE) Lancashire Branch. It constitutes a response to the West Lancashire Local Plan Review of the Housing and Economic Development Needs Assessment (HEDNA), released in March, 2017. The report considers the demographic factors that have gone into calculation of Objectively Assessed Housing Need (OAHN) with a view to assessing the integrity of the inputs and the plausibility of the outputs from a demographic view-point. Recommendations and an executive summary are given in Chapter 3.
- 2.2. The first part of the report (Chapters 4 to 8) looks at the demographic trends that feed into the OAHN and considers how the latest estimates and projections, from both the Office for National Statistics (ONS) and the Ministry for Housing, Communities and Local Government (MHCLG), have impacted on the projections in the HEDNA Report (published March 2017) in terms of OAHN. These were originally based on 2014 based estimates and projections (published June 2015 and May 2016 respectively) but have been updated with data from ONS' 2015 Mid Year estimates (published in June 2016).

¹ www.demographicssupport.co.uk

² [independent-working-group](#)

³ <http://www.parliament.uk/business/committees/committees-a-z/commons-select/public-administration-select-committee/news/future-of-the-census-1/>

⁴ <https://www.parliament.uk/documents/post/The%20future%20of%20the%20Census%2025%20Nov13,%20POST%20flyer.pdf>

- 2.3. The second part of the report (Chapters 9 to 13) looks at how the housing target is built up, at the jobs led projections which were provided by Oxford Economics (OE) and at the longer term plans from the West Lancashire Local Plan Review Technical Paper 1: Strategic Development Options and Site Allocations, September 2018⁵.
- 2.4. The report will also look at the migration changes up to and including data to Mid 2015 (with more recent data included for observation) for moves between West Lancashire and the rest of the UK (internal migration) as well as moves with the rest of the world (international migration).
- 2.5. Trends from the latest figures on National Insurance allocations for non-UK residents, GP registrations for overseas nationals and births to mothers born overseas will be assessed to see if any recent trends are changing.
- 2.6. There are early signs of changes to international migration patterns as a consequence of the Brexit vote; data released by ONS on Long Term International Migration (LTIM) on 29th Nov 2018 shows a slow-down in net migration from EU nationals offset by an increase in non-EU nationals⁶.
- 2.7. Edge Hill University has only a small percentage (<1%) of students from the EU and so Brexit will have negligible impact on student numbers.

[Contents](#)

3. Recommendations & Executive Summary (Ch refers the Chapter within the report)

- 3.1. Recommendation 1: Counter to Core Conclusion 4, headship rates should not be uplifted and the OAHN adjusted accordingly. Chapters 5, 11 and 3.11 below give more detail.
- 3.2. Recommendation 2: The evidence provided for a market signals uplift of 10% is weak and should not be applied. The OAHN should be adjusted accordingly. Chapter 9 gives more detail.
- 3.3. Recommendation 3: Until the numbers of new jobs can be validated and shown to fit in with the projections for population and dwellings then the uplift for the economic growth part of the OAHN should be discounted; Oxford Economics jobs growth numbers need to be tested in POPGROUP or other projection software to assess plausibility and consistency across population and dwelling changes. The levels of new job growth is *not* consistent with population and dwelling change. Chapters 10 & 12 give more detail.
- 3.4. Recommendation 4: Ch10.8: Reducing unemployment rates is a very sustainable way to improve the local economy without any additional infrastructure and should be a policy considered as part of the planning process.
- 3.5. Recommendation 5: Ch4.5: Reducing vacancy rates further should be part of local housing policy as it uses existing housing and reduces the need for developing on Greenfield sites.
- 3.6. Ch4.2: Whilst it is considered best practice to use more recent data, as it captures the most recent trends, and is in line with current Planning Guidance (See HEDNA 7.4), it

⁵ <https://www.westlancs.gov.uk/media/544510/tp1-strategic-development-options-and-site-allocations-final.pdf>

⁶ <https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/populationandmigration/internationalmigration/datasets/migrationstatisticsquarterlyreportprovisionallongterminternationalmigrationtimestimates/current/provisionalestimatesoflongterminternationalmigrationyejune2018.xls>

should be noted that the projections for an individual area or areas are no longer controlled to a national target, as would be the case for the ONS-produced 2014 based SNPPs.

- 3.7. Ch4.7: The impact of the trends from the 2015 Mid Year Estimates (MYEs) adds slightly to the overall number of households and dwellings, and provides a sound basis as the starting point for Objectively Assessed Housing Need (OAHN). However, the headship rate uplift should not be applied.
- 3.8. Ch5.3 Response to Core Conclusion 1: : 2014-BASED SNPP. It is important that regular reviews of trends are carried out, particularly for long term planning purposes; Tables 8 to 11 of the ONS report on accuracy of SNPPs shows the extent of the differences that can occur.⁷
- 3.9. Ch5.5 Response to Core Conclusion 2: Recessionary Impacts. Taking account of longer term trends, particularly to cover period of both recessions and growth is a sensible approach; most recent trends are more likely to occur in the short term, hence a mixed approach could be considered, using the last five years worth to project up to five years ahead, and then phase into a ten or fifteen year trend for year ten and beyond.
- 3.10. Ch5.7 Response to Core Conclusion 3: Unattributable Population change (UPC.) UPC has not been included in the projections as a) the numbers are relatively small, b) ONS cannot quantify the amount of UPC and c) It is unlikely that the errors between the 2001 census and 2011 will be replicated in 2021 due to changes in ONS MYE and Census methodology.
- 3.11. Ch5.8 Core Conclusion 4: Headship Rates (also known as Household Representative Rates - HRRs) - basis for uplift. There is no justification for this uplift for the following reasons (more detail in 5.8 to 5.9.11).
 - 3.11.1. International Migration net inflows are falling.
 - 3.11.2. Black and Minority Ethnic (BME) category has been incorrectly calculated to include "Other White".
 - 3.11.3. Declining student numbers at Edge Hill University relative to 2011 census results.
 - 3.11.4. Student debt and affordability could turn into a cohort effect, reducing HRRs.
 - 3.11.5. HRRs are based on long term trends which are more appropriate for long term planning.
- 3.12. Ch6: The increase in moves to and from West Lancashire suggests that mobility has been improving. All regions in the UK experienced net inflows of within-UK migration, except for London whose net outflows exceeded 100,000 in the year to Mid 2017.
- 3.13. Ch6.2 to 6.5. All Local Authorities are competing for extra residents to fulfil economic growth ambitions and to increase the housing supply - within the UK, migration must balance - migrants cannot be in two (or more) places at once.
- 3.14. Ch6.6: Local and strategic plans need to be compared - at the very least, at a Regional level - to test for consistency and realistic assumptions on use of migrants to satisfy dwelling and economic growth aspirations.
- 3.15. Ch7.3 There is a strong need for more sub-national variant projections from ONS (Wales and Scotland already do this) that will provide consistent and objective results for a

7

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/methodologies/subnationalpopulationprojectionsaccuracyreport>

variety of scenario testing, in particular longer migration trends. ONS are currently considering such a proposal.

- 3.16. Ch8.14: Analysis of Administrative data for international migrants up to 2015 suggests a steady number coming into West Lancashire; however, statistics on those leaving each year are not available and so a net figure is not available. Recent trends (beyond 2015) are stable, in spite of Brexit uncertainties.
- 3.17. Ch8.16: General Comment: Projection scenarios that assume above-trend growth must take extra migrants **either** from elsewhere in the UK, in which case those migrants should be subtracted from the population from whence they came **or** taking someone else's share of the international migrant pool. One area's gain is another area's loss **unless** allowance is made for the net flow of international migrants to increase.
- 3.18. Ch9.2: It is clear that the Ministry for Housing, Communities and Local Government (MHCLG) will have to reconsider how household projections are interpreted and used when assessing housing need and how to make best use of the new projections.
- 3.19. Ch9.3: West Lancashire have only managed to build above the proposed phasing in two years (2014 & 2015) since the recession in 2007/08 and the aggregate build planned for 2012 to 2018 was 2,180 and only 1,920 have been built (net). There is clearly an issue relating to capacity and / or demand.
- 3.20. Ch9.6.11: From Section 9 of the HEDNA, GL Hearn provides little evidence to justify uplift due to market signals and finds limited issues with affordability and yet still applies a 10% uplift. West Lancashire has been building roughly to previous targets, has a higher value mix of properties than the surrounding area and has been building higher value properties in recent years. It should be targeting smaller sites and lower value properties that will have the effect of lowering the affordability ratio.
- 3.21. Ch 9.6.14: GL Hearn to clarify the status of specialist housing in terms of whether residents are part of the Communal Population, as per CLG definitions or included in the household population.
- 3.22. Ch9.6.15: The number of full time students living in bespoke accommodation should be included as communal population but because ONS keep the numbers of communal population fixed at 2011 census level, these students will be incorrectly added to the household population. See 5.9.7. and 5.9.8 for further detail. ONS are considering a change in methodology to allow for changing levels of student accommodation which will improve estimates for the communal population.
- 3.23. Ch10.2 & 10.5: There is no information on how Oxford Economics establish their population projections. A consistent set of baseline population projections are essential in order to assess how the extra jobs impact on population and dwelling requirements. Further information should be sought to clarify their methodology. Clarification is needed from GL Hearn to establish the base year from which the numbers of new jobs is calculated.
- 3.24. Ch10.3: The assumption that the economy will grow without a recession for the next 25 years is not realistic, but is exactly what these forecasts assume. Certainly in the short term, the proposed level of GVA growth looks achievable.
- 3.25. Ch10.9 & 10.10: The numbers of dwellings arising from the extra 6,000 jobs is totally inconsistent and requires further explanation. The dwellings per annum (dpa) from

HEDNA 8.26 of 21 is out by a factor of 10, if the jobs are on top of those from the 2014 based projections.

- 3.26. Ch13.2 & 3: Planning long term using the SNPPs & SNHPs is uncertain, particularly for a single Local Authority. In their report on accuracy of SNPPs, ONS warn that "*the main findings are that the projections are less accurate for smaller geographical areas and when the period between the projection and the reference year (2011) increases*"⁸.
- 3.27. Ch13.2 & 3: Looking as far forwards as 2050, from a demographic viewpoint, is too far ahead to give sensible figures. ONS report on their 2016 SNPPs say the following: "*Projections become increasingly uncertain the further they are carried forward. In the longer-term, demographic patterns are increasingly likely to differ from recent trends. This is particularly so for smaller geographical areas and detailed age and sex breakdowns.*"⁹ i.e. projections closest to Census year are the more accurate as MYEs include errors that are corrected every ten years.
- 3.28. Ch13.4: The Shelf life of SNPPs in England by Professor Ludi Simpson¹⁰ shows that the smaller the area (population size) the higher the error. For Shire Districts (see Table 3) it estimates that after 10 years, you can be 80% sure the projections are within 6% of the forecast, at 20 years it is 11%.
- 3.29. Ch13.13: Local Plan Review: Technical Paper 1(TP1¹¹), Sept 2018. The (over) ambition of delivering 421 dpa seems to ignore the figures from the West Lancashire HEDNA (March 2017), where the OAHN is 241 dpa. This would imply an extra 180 dpa for policy-on options which would add approximately 16,000 more residents, and require another 7,500 to 8,000 MORE jobs ON TOP OF the 6,000 jobs from the OE Baseline Scenario.
- 3.30. Ch13.14 It is not clear how many of the additional dwellings in TP1 are accommodated by the increase in jobs from OE, nor is it shown how many jobs result from the 2014 SNPP/2015 MYE population projections BEFORE the additional 6,000 jobs are added. These numbers need clarifying to ensure consistency.
- 3.31. More recent MYEs (to Mid 2017) and 2016 based sub national population and household projections, now both produced by ONS, have not been considered but produce lower figures for projected households (129 households per annum for 2012-2037).

[Contents](#)

⁸ <https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/populationandmigration/populationprojections/methodologies/subnationalpopulationprojectionsaccuracyreport/snppaccuracyreportfinaltcm774144461.pdf>

⁹ <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/subnationalpopulationprojectionsforengland/2016based/pdf>

¹⁰ <http://hummedia.manchester.ac.uk/institutes/cmist/archive-publications/working-papers/2018/Simpson%20Wilson%20Shallev%202018%20The%20shelf%20life%20of%20subnational%20projections%20CMI%20paper%2004%20Sept2018.pdf>

¹¹ <https://www.westlancs.gov.uk/media/544510/tp1-strategic-development-options-and-site-allocations-final.pdf>

4. 2014 Based Projections and 2015 Mid Year Estimates

4.1. The original data for the West Lancashire HEDNA were the 2014 based sub-national population projections from ONS (SNPPs)¹² which in turn fed the MHCLG 2014 Sub-National Household Projections (SNHPs)¹³.

4.2. GL Hearn have used the then more recent ONS Mid Year Estimates for 2015 (Published in June¹⁴) to roll the starting point of the projections forward one year. The impact is small upward effect on the projections which result from a) higher net inward internal migration (from within the UK) which is partially offset by b) slightly lower net inward international migration and c) small changes in natural change (births minus deaths). Overall this change adds around 800 to the population by 2037. Table 1 shows the base figures, the original ONS SNPPs and the revised projection using the 2015 MYE as the base.

Whilst it is considered best practice to use more recent data, as it captures the most recent trends, and is in line with current Planning Guidance (See HEDNA 7.4), it should be noted that the projections for an individual area or areas are no longer controlled to a national target, as would be the case for the ONS-produced 2014 based SNPPs.

Table 1 : 2014 Based & 2015 Based Population Estimates & Projections for West Lancashire.

Local Authority	Base	Source	Mid 2012	Mid 2013	Mid 2014	Mid 2015	...	Mid 2037	Change 2012-37
West Lancashire	2014 Based	ONS SNPPs	110,930	111,310	111,940	112,180	...	116,170	5,250
West Lancashire	2015 Based MYEs	ONS Original MYEs	110,930	111,310	111,940	112,740			
West Lancashire	2014 Based/2015 MYEs	Revised SNPPs	110,930	111,310	111,940	112,740	...	116,980	6,050

Source: ONS 2014 based SNPPs © Crown Copyright. Note: Figures are rounded to nearest 10.

4.3. MHCLG 2014 Based sub-national Household projections and dwelling calculations based on the ONS 2014 Based SNPPs, are shown in Table 2 below.

Table 2 : 2014 Based Household & Dwelling Projections for West Lancashire.

Local Authority	Base		Mid 2012	Mid 2013	Mid 2014	Mid 2015	...	Mid 2037	Change 2012-37	Annual Mid 2012-37
West Lancashire	2014 Based	Households	45,590	45,750	45,990	46,210	...	49,710	4,120	165
West Lancashire	2014 Based	Vacancy Rate	2.5%	2.5%	2.5%	2.5%	...			
West Lancashire	2014 Based	Dwellings	46,750	46,930	47,170	47,390	...	50,980	4,230	169

Source: MHCLG 2014 based SNHPs © Crown Copyright & GL Hearn Assumptions on Vacancy.

Note: Base figures are rounded to nearest 10. Annual figures based on unrounded figures.

4.4. The number of households in West Lancashire was projected to grow by 9% over the plan period, with average annual household growth of 165 and for dwellings, assuming a 2.5% vacancy rate, 169.

4.5. **Vacancy:** Numbers of households are converted to dwellings using the vacancy rates (Dwellings= Households/(1-Vacancy Rate) which are derived from the MHCLG Tables 125 (Dwellings) and Tables 615 (Vacant)¹⁵, which in turn are based on Council Tax returns. Figures for 2012 show West Lancashire had a vacancy rate of 3.3% in 2012 and by 2015, it had fallen to 2.8%. For the projection period, an assumption of 2.5% has been used.

¹²

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/subnationalpopulationprojectionsforengland/2014basedprojections>

¹³ <https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections#based-live-tables>

¹⁴

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/annualmidyearpopulationestimates/mid2015/relateddata>

¹⁵ <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>

The assumptions around vacancy rates are sound and reflect current thinking that vacancy rates should be reduced as part of local housing policy.

- 4.6. Table 3 shows the impact of the move to using ONS 2015 MYEs as the base in conjunction with the 2014 household projections. GL Hearn have not shown the household projection figures including the move the 2015 MYEs *before* including the headship rate (also known as Household Representative Rate - HRR) uplift (from HEDNA Section 7.53 Table 15). However, by deduction, the move from what is labelled "2014 Based SNPP" to "2014 Based SNPP + MYE" should be equivalent and shows an increase of 7 dwellings per annum (as per the difference between rows two and three in Table 3 below).

Table 3 : 2014 SNHPs/2015 MYE Based Household Projections for West Lancashire.

Local Authority	Base	Households Mid 2012	...	Households Mid 2037	Annual Households 2012-37	Vacancy Rate	Annual Dwellings 2012-37
West Lancashire	2014 Based Unadjusted	45,590	...	49,710	165	2.5%	169
West Lancashire	2014 Based Adjusted	45,590	...	50,310	189	2.5%	193
West Lancashire	2014 Based Adjusted/2015 MYEs	45,590	...	50,472	195	2.5%	200

Source: MHCLG 2014 based SNHPs © Crown Copyright & GL Hearn adjusted projections. Note: Figures are rounded to nearest 10.

- 4.7. Table 3 also reveals the impact of the uplift to headship rates which adds 24 dwellings per year (the difference between rows one and two. Section 5.8 to 5.9.11 will argue why that uplift should not be applied.

The impact of the trends from the 2015 MYEs add slightly to the overall number of households and dwellings, and provides a sound basis as the starting point for Objectively Assessed Housing Need (OAHN). However, the headship rate uplift should not be applied.

- 4.8. Projections for births and deaths at Local Authority level follow the long term trends from the National Population Projections, but are adjusted to reflect the differentials in age and sex fertility and mortality rates within each Local Authority. This is replicated in the POPGROUP models and birth and death rates react to changes in the overall population age and sex structure that result from whatever migration assumptions are used. There are no issues surrounding the use of the Fertility and Mortality rates from the SNPPs or the move to using the 2015 MYEs

[Contents](#)

5. Analysis of the Core Conclusions from the HEDNA

- 5.1. HEDNA 7.12 : CORE CONCLUSION 1: 2014-BASED SNPP
"The 2014-based SNPP is a sound population projection in terms of the methodology employed by ONS. It is however limited by the fact that it is based on short-term trends. 2015 ONS Mid-Year Population Estimates have been released and it is therefore not necessary to project population growth 2014-15."
- 5.2. This covers two aspects. Firstly, the suggestion that using a 5 to 6 year base for long term (25 years) projection is a limitation is a very useful point to raise. Using a longer term trend to cover peaks and troughs in the economic cycle is an idea being considered by ONS and a ten year trend base may be released as an alternative scenario. The advantage of an ONS produced scenario would be that the results would be controlled to a nationally consistent figure.
- 5.3. Secondly, using the latest actual data to replace projected figures is exactly what should be done, and fertility, mortality and migration rates should all be recalculated and new base trends established.

It is important that regular reviews are carried out, particularly for long term planning

purposes; Tables 8 to 11 of the ONS report on accuracy of SNPPs shows the extent of the differences¹⁶.

- 5.4. HEDNA 7. CORE CONCLUSION 2: RECESSIONARY IMPACTS;
"Given the difference between pre- and post-recession migration trends, it is reasonable to model alternatives to the SNPP which take account of longer-term migration trends."
- 5.5. This is a sensible approach over the longer term though most recent trends are more likely to occur in the short term, hence a mixed approach could be considered, using the last five years worth to project up to five years ahead, and then phase into a ten or fifteen year trend for year ten and beyond. This should be considered alongside recent house building activity (has it been above or below what is likely to happen in the next five years) which may either suppress or enhance recent migration figures.
- 5.6. HEDNA 7.25 CORE CONCLUSION 3: UNATTRIBUTABLE POPULATION CHANGE (UPC)
"Given the difference in the significance of UPC in the City Region, it is reasonable to model alternative long-term scenarios to take account of this. However, any UPC adjustment should a) be treated with caution, b) only be applied to longer-term trend based projections and c) outputs should be considered alongside equivalent unadjusted projections in the form of a range."
- 5.7. It is indeed reasonable to test out scenarios with and without UPC. For West Lancashire UPC was negative - meaning that ONS MYEs through the 2000s had over-estimated the population by 2011 (by around 1,300). However, ONS methodology has changed and errors that will fall in 2021 will be of a different nature as a result.
Consequently, ONS made the decision to exclude UPC and their reasoning is explained in their SNPP Accuracy Paper, Annex B.¹⁷
- 5.8. HEDNA 7.49 CORE CONCLUSION 4: HEADSHIP RATES
"This section has provided a detailed interrogation of household formation rates. For West Lancashire there is local evidence that more positive household formation amongst those aged 25-34 and 35-44 would be a reasonable planning assumption."
- 5.9. There are five reasons to disagree with this assumption.
- 5.9.1. Reason 1: International Migration. The HEDNA was written after the decision to leave the EU though at that stage there was no information on how International migration might change. ONS recently (29th November, 2018) release long term international migration estimates (LTIM) for the year to June 2018 which gives a view two years after the vote¹⁸. The latest figures are shown in Table 4 below.

¹⁶

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/methodologies/subnationalpopulationprojectionsaccuracyreport>

¹⁷

<https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/populationandmigration/populationprojections/methodologies/subnationalpopulationprojectionsaccuracyreport/snppaccuracyreportfinaltcm774144461.pdf>

¹⁸

<https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/populationandmigration/internationalmigration/datasets/migrationstatisticsquarterlyreportprovisionallongterminternationalmigrationtimestimates/current/provisionalestimatesoflongterminternationalmigrationyejune2018.xls>

Table 4 - ONS Long Term International Migration Estimates by Nationality (000s)

Time Period Year Ending	IN	British	EU	Non-EU	% British	% EU	% Non-EU
YE Jun 16	652	77	284	291	12%	44%	45%
YE Jun 17	566	79	226	262	14%	40%	46%
YE Jun 18 ^p	625	80	219	326	13%	35%	52%
	OUT	British	EU	Non-EU	% British	% EU	% Non-EU
YE Jun 16	316	127	95	95	40%	30%	30%
YE Jun 17	340	127	123	90	37%	36%	26%
YE Jun 18 ^p	351	128	145	78	36%	41%	22%
	NET	British	EU	Non-EU			
YE Jun 16	+ 336	- 49	+ 189	+ 196			
YE Jun 17	+ 226	- 48	+ 103	+ 172			
YE Jun 18 ^p	+ 273	- 49	+ 74	+ 248			

Notes: YE Jun 18^p Provisional Figures. As a survey it has confidence intervals of +/- 40,000 to 50,000

5.9.2. 7.39 of the HEDNA states "Whilst the international migration impact is not expected to change, any suppression as a result of the economy and housing market could improve in the future."

Firstly, overall UK international migration has fallen by 63,000 since June 2016. Secondly the mix of migrants has changed with fewer EU Migrants (fewer IN and more OUT, down 115,000 net) and more non-EU migrants (more IN, fewer OUT, Net up 52,000).

Brexit is an excellent example that demonstrates the need to review assumption regularly and that it is difficult to make assumptions when there is no similar event to compare it with.

5.9.3. For West Lancashire, numbers of International migrants are small, in the mid hundreds with net flows of between 100 and 300 over the last 6 years (since Mid 2016 - ONS MYEs).

Reason 1. International Migration is falling and the impact of current negotiations is unlikely to have a positive effect on household formation rates, particularly in the short term. Furthermore, numbers are small and thus unlikely to have even a marginal impact.

5.9.4. Reason 2 - Assumptions about Black and Minority Ethnic (BME) Population. The HEDNA 7.45 categorises White Other from the 2011 Census as BME - this is incorrect; BME predates the split of White ethnicities so it excludes White minority ethnicities. Analysis of the 2011 Census Table QS211EW - Ethnic group (detailed) shows that most of the change is actually white Europeans and not BME, as seen in Table 5 below. This is also supported by National Insurance Number application data from DWP and the Council's own website.

Table 5 - Census Table QS211EW - Ethnic group (detailed)

QS211EW - Ethnic group (detailed)	West Lancashire
Ethnic Group	E07000127
All categories: Ethnic group	110,685
White: English/Welsh/Scottish/Northern Irish	105,775
White: Irish	584
White: Polish	555
White: Other Western European	352
White: Baltic States	314
White: European Mixed	297
White: Other Eastern European	241
White: Italian	36
White: Greek	15
White: Greek Cypriot	9
White: Gypsy or Irish Traveller	8
White: Cypriot (part not stated)	3
White: Any other ethnic group	2,496

Source: 2011 Census ONS Crown Copyright. Table QS211EW.

- 5.9.5. West Lancashire Council's own web-site concurs..." *The ethnicity of residents is almost entirely White British - around 5% of the population in Skelmersdale declared themselves to be White Other which could reflect the Eastern European community living and working in the area.*"¹⁹
- 5.9.6. Furthermore, National Insurance Number (NINO) allocations data shows that since accession in 2004/5, the proportion of EU allocations each year up to 2016/17 made up between 85% and 94% of all NINO allocations. EU citizens under the age of 35 account for 70% of all allocations.²⁰
Reason 2 - Assumptions about the change in the BME population are incorrect. There is no need for an uplift on headship rates for younger age groups based on international migrants.
- 5.9.7. CORE CONCLUSION 5: STUDENTS
 "West Lancashire has a notable student population that could potentially impact on the population and household projections. However, the demographic projections contain limited additional growth from students (and student households) and so this cohort of the population is not unduly influencing local projection data."
- 5.9.8. Reason 3 - Assumption on Student Numbers. The main student population relates to Edge hill University, located in Ormskirk. The University used to be predominantly part-time students who made up two thirds of all students in 2010/11 but who now make up just 25% in 2015/16 (Source: HESA²¹). MHCLG and the new ONS methodology retain a fixed number of communal (also known as Institutional) establishment residents for the under 75 from the 2011 Census (unlike the over 75s

¹⁹ <https://www.westlancs.gov.uk/about-the-council/how-the-council-works/equality-and-diversity/find-more-information/demographic-breakdown-of-west-lancs.aspx>

²⁰ <https://stat-xplore.dwp.gov.uk/webapi/metadata/NINO/NINO.html>

²¹ <https://www.hesa.ac.uk/data-and-analysis/publications/students-2014-15> and similar to 2010/11

where a proportion is used). Numbers attending the University have fallen from just under 28,000 in 2010/11 (the time of the 2011 Census) to 15,500 and it is likely that the Communal Establishment population in both the 2014 and the newly released 2016 SNPPs & SNHPs will be under-estimated, especially as the Campus now boasts 2,500 bespoke student rooms.

Reason 3: The declining student numbers at Edge Hill University relative to 2011 census results, combined with an increase in bespoke accommodation results in too many students being counted in the household population and thus incorrectly adding to household population and household representative rates.

- 5.9.9. Error in HEDNA 7.57 - Correction required. *"The population aged 18-24 increased by 12,200 persons (42%), influenced by strong growth in the student population at Edge Hill University. The ONS 2014-based demographic projections do not assume further growth, indeed they assume a 7% fall in the population in these age groups through to 2029."*

Firstly, the 18-24 age group grows from 8,590 in 2001 to 12,204 in 2015 and not "increased by 12,200".

Secondly, the fact that this age group is projected to fall is heavily influenced by the trends in births over preceding years. The low numbers of births nationally around the turn of the millennium can be seen in lower numbers of 18-24 in the early 2020s 1990s and similar peaks (1990 and 2012) and troughs (can be seen following these patterns 20 or so years later; the increase is not due to student numbers, as shown in section 5.9.8 above.

- 5.9.10. **Reason 4: Student Debt.** Recent trends may continue and turn into a cohort effect which may reduce HRRs in future years at older ages. Those with student debt and priced out of the market are going to have to rent and share more or return to the family home which could lead to larger household sizes (Average Household Size - AHS in the UK didn't fall between the 2001 and 2011 Censuses) and would therefore lower HRRs at older ages. The article from Town & Country Planning (T&CP) by Professor Ludi Simpson²² looks at this issue and there has been no evidence presented to suggest that HRRs will return to 2008 levels for those aged 25-44 - it ignores the trends in an arbitrary way. By 2035, almost the entire cohort aged 25-44 who undertook higher education in England will have experienced higher university fees for the duration of their course(s). It is also an early warning that affordable housing is still an issue after a near halving in number in 2015/16 compared to the previous year²³; numbers have recovered though are still below any year since 2005/06.

Reason 4: Suppressed demand in the younger age groups due to student debt and affordability could turn into a cohort effect, reducing HRRs further.

- 5.9.11. **Reason 5 - Long term trends:** The presumption to increase HRRs for the 25-44s ignores the long term trends - the Stage 1 HRRs (MHCLG Methodology Report²⁴) used in the MHCLG SNHPs are based on long term trends starting in 1971 and continuing to 2011 Census data, and then supplemented by the latest information from the Labour Force Survey (LFS). There is no objective basis for choosing to adjust any age group.

Reason 5: HRRs are based on long term trends which are more appropriate for long term planning.

²² <https://www.escholar.manchester.ac.uk/api/datastream?publicationPid=uk-ac-man-scw:243721&datastreamId=POST-PEER-REVIEW-PUBLISHERS.PDF>

²³

²⁴ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/758193/Live_Table_1000.xlsx
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/536705/Household_Projections_2014-based_Methodology_Report.pdf

[Contents](#)**6. Internal Migration - Moves within the UK**

- 6.1. In line with PPG paragraph 2a-017 is an analysis of migration within the UK (internal migration) and international migration (Section 7). This is intended to demonstrate any changes in trends. ONS publish detailed estimates for internal moves (annually from 2011) and data are available by Single Year of Age and Sex for all Local Authorities in the UK.
- 6.2. Moves to and from West Lancashire, within the UK are shown in Table 6 (2011-12) and Table 7 (2014-15) and these compare how the top ten moves INTO and OUT of West Lancashire have changed and look at where the main flows lie.

Table 6 : Top Ten flows INTO (and OUT of) West Lancashire 2011-12.

LA_Code	LA_Name	HMA_Area	Moves INTO	% of Total	MOVES OUT	% of Total	Net Flows
E07000127	West Lancashire	Central HMA	5043		5055		-12
E08000014	Sefton	Central HMA	870	17%	930	18%	-60
E08000010	Wigan	Outside_HMA	484	10%	513	10%	-29
E08000012	Liverpool	Central HMA	331	7%	358	7%	-27
E07000126	South Ribble	Outside_HMA	187	4%	126	2%	60
E08000011	Knowsley	Central HMA	169	3%	101	2%	69
E08000013	St. Helens	Central HMA	130	3%	158	3%	-28
E07000118	Chorley	Outside_HMA	126	2%	188	4%	-62
E07000123	Preston	Outside_HMA	113	2%	115	2%	-2

Source: ONS Detailed Migration, Local Authority Moves, 2011-12, (c) Crown Copyright.

- 6.3. Table 6 shows that Sefton is the main Local Authority that exchanges migration, almost double any other Local Authority and accounting for more than 1 in 6 IN flows and OUT flows. In net terms, most areas cancel each other out with very little net change. For Sefton, almost one third of migration (IN and OUT) is between the City of Liverpool and around 10% between West Lancashire. Net flows for Sefton are also small with the exception of City of Liverpool and Knowsley where there are larger net IN flows and net OUT flows to University Cities (Lancaster, Leeds & Manchester). Overall, net UK migration for Sefton was almost zero (+17).
- 6.4. Table 7 looks at the same flows but for the flows that make up the 2015 MYEs.

Table 7 : Top Ten flows INTO (and OUT of) West Lancashire 2014-15

LA_Code	LA_Name	HMA_Area	Moves INTO	% of Total	MOVES OUT	% of Total	Net Flows
E07000127	West Lancashire	Central HMA	5812		5374		438
E08000014	Sefton	Central HMA	922	16%	881	16%	40
E08000010	Wigan	Outside_HMA	513	9%	546	10%	-33
E08000012	Liverpool	Central HMA	399	7%	431	8%	-33
E07000118	Chorley	Outside_HMA	238	4%	247	5%	-9
E08000013	St. Helens	Central HMA	200	3%	185	3%	14
E08000011	Knowsley	Central HMA	179	3%	133	2%	47
E07000126	South Ribble	Outside_HMA	172	3%	139	3%	33
E08000003	Manchester	Outside_HMA	119	2%	126	2%	-7

Source: ONS Detailed Migration, Local Authority Moves, 2014-15, (c) Crown Copyright.

- 6.5. Table 7 shows that again, Sefton remains the top Local Authority for migration exchange. Again, net flows are still small. Overall flows have increased in both directions, with a net IN flow of over 400 for 2014-15. The only change is Preston has dropped out of the

top ten and is replaced by Manchester. For Sefton, it remains that almost one third of migration (IN and OUT) is between the City of Liverpool and around 10% between West Lancashire. Net flows for Sefton remain small with the exception of City of Liverpool and Knowsley where there are larger net IN flows and net OUT flows to University Cities of Leeds & Manchester. Overall, net UK migration for Sefton is now more positive at +600.

- 6.6. For West Lancashire to grow its population using internal migration, it is going to have to attract more population from the Liverpool City Region area and then from Greater Manchester - however, the Greater Manchester Strategic Framework (second draft pending) is also looking to grow and will need to top-up its population with migrants from these same areas - Liverpool, Cheshire & Lancashire - there is a danger that these migrants are being used twice.

Local and strategic plans need to be compared - at the very least, at a Regional level - to test for consistency and realistic assumptions on use of migrants to satisfy dwelling and economic growth aspirations.

[Contents](#)

7. Internal Moves - Migration within the UK - General Analysis

- 7.1. At the UK level, population changes occur through ageing, natural change (births minus deaths) and international migration (net flows). Internal moves within the UK are a zero sum result - one Local Authority's gain is another Local Authority's loss.
- 7.2. The National (UK) Population Projections (NPPs) are produced by ONS in collaboration with the devolved Statistical Agencies of National Records Scotland (NRS), StatsWales and the Northern Ireland Statistical Research Agency (NISRA). Projections for each constituent country (available here²⁵ and 2016 NPPs have also been released²⁶), along with a set of variant projections (high and low fertility, high and low life expectancy, high and low migration, zero net migration) are also produced and are used by several government departments such as Education (School Roll Planning), Home Office (immigration Policy), HMRC (Tax revenues), DWP (Pensions forecasts), MHCLG for Household Projections - each has its own requirements and each looks at differing time scales.
- 7.3. Currently, in England, ONS take the Principal Population Projection and use it to publish sub-national population projections with the sum of all the components of change at the Local Authority level controlled to the national figure. No variant population projections for migration are yet produced but ONS are considering producing a ten year migration trend variant²⁷.
- To do so would help resolve the issue of doubling counting of migrants across the UK if two different sets of projections are in use at the same time. At the moment, outside ONS projections, there is no mechanism to ensure that movers within the UK cancel each other out.
- 7.4. To add such a constraint outside the national context would be very difficult; all Plans (Strategic & Local) would have to be agreed simultaneously. Having a nationally produced set to balance internal migration would resolve this issue; Local Authorities could still

²⁵

<http://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/nationalpopulationprojections/2015-10-29/relateddata>

²⁶

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/nationalpopulationprojections/2016basedstatisticalbulletin>

²⁷

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/methodologies/2016basedsubnationalpopulationprojectionsfrequentlyaskedquestions>(Section 17).

grow their population above the "official" trend base, but only through policies that grow international migration or by agreeing trade-offs of migrants, perhaps within a regional context.

- 7.5. As it stands, the POPGROUP software models each Local Authority independently and each Local Authority, can, in turn, take migrants without limit and without a balancing reduction from the pool that the migrants have come from. There is no attempt to remove extra migrants gained in one area from the areas they have come from with the effect that:-
 - 1). UK internal migration will not sum to zero, as it should and
 - 2). International migration numbers will need to be higher than in the UK projections, if all areas are attempting to grow at a rate above the ONS SNPPs.
- 7.6. Consider the UK as a whole; the POPGROUP software would allow you to increase flows of internal in-migration for all Local Authorities at the same time - there is no constraint on the overall total, which in reality, should sum to zero in net terms. This is why it is important that ONS and the other devolved statistical agencies publish variant projections that are controlled correctly and provide a balanced set of internal (and international) migration and that the same set is used as the starting point.
- 7.7. As the process currently stands, the duty to cooperate with neighbouring Local Authorities would have to be extended so that there is agreement that not all Local Authorities can gain at the same time. Simultaneous above-trend growth can only really occur if net international migration is increased, and that is certainly NOT a Government Policy at the moment. On Planning, the Government Policy is aimed at driving growth through Strategic Plans while Local Plans are being challenged for not being ambitious enough - but the sum of the parts is greater than what is mathematically possible. This issue needs to be seriously considered.

[Contents](#)

8. *International Migration - Moves to and from Outside the UK*

- 8.1. ONS measure the movements of international migrants using the International Passenger Survey (IPS) which is principally used for Balance of Payments calculations. It has long been recognised as the weakest part of the population estimation process, particularly at Local Authority level as the sample size of long-term migrants (those coming to stay (or leaving the UK) for a period of more than one year, and therefore classed as a resident, is very small - in 2015, approximately 2,100 for in-migrants and 1,200 for out-migrants²⁸ for the whole of the UK.
- 8.2. These numbers are scaled up to the totals that make up the flows that appear in the Long Term International Migrations (LTIM) Statistics that are released on a rolling quarterly basis. Figures for the year to Mid 2015 for the UK were estimated to be 639,000 in-migrants and 303,000 out-migrants²⁹.
- 8.3. International flows for West Lancashire are shown in Tables 8 below.

²⁸

<https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/populationandmigration/internationalmigration/datasets/internationalpassengersurvey/marginsoferror/table102/current/1.02ipsmarginsoferror1975to2017.xls>

²⁹

<https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/populationandmigration/internationalmigration/datasets/migrationstatistics/quarterlyreport/provisional/longterminternationalmigration/ltimestimates/current/provisional/estimatesoflongterminternationalmigration/yejune2018.xls> (See Table 1).

Table 8 - Inward migration from outside the UK into West Lancashire - 2001/02 to 2014/15

International Migration Flows	IN flows	OUT flows	Net Flows	Rolling 6 Year Average
Year to Mid 2002	107	148	-41	
Year to Mid 2003	171	144	27	
Year to Mid 2004	98	168	-70	
Year to Mid 2005	189	258	-69	
Year to Mid 2006	564	304	260	
Year to Mid 2007	534	357	177	47
Year to Mid 2008	522	303	219	91
Year to Mid 2009	497	232	265	130
Year to Mid 2010	568	167	401	209
Year to Mid 2011	492	179	313	273
Year to Mid 2012	442	236	206	264
Year to Mid 2013	416	261	155	260
Year to Mid 2014	492	274	218	260
Year to Mid 2015	468	274	194	248
Year to Mid 2016	509	264	245	222
Year to Mid 2017	495	368	127	191

Source: ONS 2015 MYE Components of Change © Crown Copyright.

8.4. Table 8 above - international migration inflows are lower in 2014/15 than in the years just after the EU Accession countries (A8) gained freedom of movement in 2004. The impact of Brexit vote is still uncertain, however, the net flows are lower in the more recent ONS MYEs. Clearly this an area that will need close monitoring over the next few years.

Recommendation: Review international migration every two years - as ONS do for their national and subnational population projections.

8.5. ONS revised its methodology to improve the allocation of international migrants across Local Authorities and now uses statistics from a range of administrative sources including National Insurance Allocations, GP registrations, student data from the Higher Education Statistical Agency (HESA)³⁰.

8.6. Some of these data are available on the ONS Local Authority Migration Indicator (LAMI) Tool³¹ and recent trends are shown in Table 9 below.

³⁰ <http://www.ons.gov.uk/ons/guide-method/method-quality/imps/improvements-to-local-authority-immigration-estimates/overview-of-improved-methodology.pdf>

³¹ <https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/populationandmigration/migrationwithintheuk/datasets/localareamigrationindicatorsunitedkingdom/current/publicviewmastercopylocalareamigrationindicatoraugust2018.xlsx>

Table 9 - International Migration Indicators for West Lancashire, 2008 to 2017

Period	Annual	April to March	April to March	Mid Year	Annual	Mid Year
Year	NINO	NINO % EU	% Under 35	GP Registrations	% Births to Non-UK Born Mothers	Short Term International Migrants
2008	789	89%	83%	483	6.3	220
2009	721	93%	83%	559	7.5	147
2010	672	92%	85%	521	7.7	65
2011	652	90%	81%	535	7.8	79
2012	624	89%	83%	435	10.4	172
2013	589	91%	79%	455	10.1	148
2014	629	90%	79%	498	9.0	241
2015	704	94%	76%	444	11.5	172
2016	713	93%	76%	458	10.5	225
2017	705	93%	75%	454	10.4	NYA
2018	665	85%	69%	NYA	NYA	NYA
Sources	A	B	C	D	E	F

All available on ONS Local Area Migration Indicators Spreadsheet, ONS³² NYA - Not Yet Available

Source A: ONS, NISRA, National Insurance Number allocations - Department for Work and Pensions (DWP)s.

Source B: <https://stat-xplore.dwp.gov.uk/webapi/jsf/tableView/tableView.xhtml#>

Source C: <https://stat-xplore.dwp.gov.uk/webapi/jsf/tableView/tableView.xhtml#>

Source D: ONS, NISRA, Patient Register Data Service (PRDS)

Source E: ONS, NISRA, National Insurance Number allocations - Department for Work and Pensions (DWP)s.

Source F: International Passenger Survey (IPS), ONS and administrative data sources

- 8.7. **NINO:** Column A: Numbers of National Insurance Number (NINO) Allocations fell following the banking crisis of 2007/08. More recent figures for 2014 and 2015 are back to those levels and even post Brexit vote, the numbers remain around the 700 mark for 2016 and 2017 whilst for 2018, there are signs of a slow-down. Overall, this suggests continuing job opportunities in West Lancashire for overseas migrants. However, information on net change is not available as there is no requirement to de-register when leaving the country.
- 8.8. **NINO:** Column B & C shows that the vast majority of NINO allocations are for EU citizens and that ratio of 9 out of ten is holding in all but the most recent data while Column C shows that up until 2017, over three quarters of NINO allocations were to the under 35s. As the proportion of EU allocations fall, so will the mix by age and nationality.
- 8.9. **GP Registrations:** Column D. Numbers of non-UK nationals who register with a GP have been averaging around 475 per annum. Most recent figures for 2016 and 2017 have held steady at around 450. This is around the same level as the Inflows from the MYEs, though the MYEs apply only to Residents i.e. those staying in the UK for over a year whereas eligibility for GP Registration is based on an intention to stay at least 6 months. As with NINO allocations, net change is not available as there is no requirement to de-register when leaving the country.
GP Registrations cover all ages and will include some non-residents (MYE definition).
- 8.10. **Births to Overseas Mothers:** Column E - Mothers born overseas have a higher number of children than their UK born counterparts. The estimated total fertility rate (TFR) for UK born women remained unchanged, with 1.76 children per woman in 2015; for non-UK born women the estimated TFR decreased to 2.08 compared with 2.10 in 2014³³.
However, births have little impact on the numbers of dwellings needed over the next 20

³²

<https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/populationandmigration/migrationwithintheuk/datasets/localareamigrationindicatorsunitedkingdom/current/publicviewmastercopylocalareamigrationindicatoraugust2018.xlsx>

³³

<http://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/livebirths/bulletins/parentscountryofbirthenglandandwales/2015>

years but may affect the type of houses needed in terms of size.

Trends currently show that TFRs for non-UK born mothers are slowly converging. In 2012, the figure was 2.3 vs. 1.9 and in 2004, 2.5 vs. 1.7. Latest figures for 2017 show that convergence continuing 1.95 for non-UK born women vs. 1.71 for UK born women.

8.11.Short Term Migrants: Column F - Numbers come from the International Passenger Survey (IPS) and cover those staying in the UK for between 3 and 12 months. Numbers are very small, at around 0.2% of the resident population, below the national average for England (0.36%).
These migrants are not accounted for either in the MYEs or the SNPPs as they are not classified as residents. However, they do need accommodation and will add to the demand for housing, though these numbers can include students and so may be absorbed into communal student accommodation.

8.12.Overseas Students. These data come directly from HESA Tables available here³⁴ and are not included in the ONS LAMI Spreadsheet. Edge Hill University, based in Ormskirk, is the only University sited within West Lancashire. Table 10 below shows the dramatic changes it has seen since 2010/11.

Table 10 - Numbers of Students at Edge Hill University, 2010/11 to 2016/17

	All Students	All Students	All Students	All Students	All Students	All Students
Academic Year	Part Time	Full Time	% Part Time	Total Students	% EU	% Non-EU
2010/11	18,465	9,490	66%	27,955	0.8%	1.0%
2011/12	12,240	10,110	55%	22,350	0.7%	0.3%
2012/13	7,885	10,650	43%	18,535	0.5%	0.3%
2013/14	6,075	10,670	36%	16,745	0.5%	0.5%
2014/15	5,315	10,860	33%	16,175	0.4%	0.5%
2015/16	4,395	11,145	28%	15,540	0.4%	0.5%
2016/17	3,740	11,475	25%	15,215	0.7%	0.9%

Source: HESA Annual Statistics. Postgraduates & Undergraduates combined.

8.13.Aggregated figures show significant falls in 2010/11, 2011/12 and 2012/13, as the numbers of part-time students plummeted, presumably due to the introduction of the tuition fees. Full time students have grown slightly each year, with overall numbers falling from 28,000 to 16,200 in 2014/15, and have held steady since. There are very few international students making up less than 2% of the total.

8.14. Overall, numbers of international migrants are small with gross flows in the mid hundreds and net flows in the low hundreds. The administrative data shows steady levels of NINO allocations, GP registrations and proportions of births to non-UK born mothers with no signs - yet - of changes due to Brexit

8.15.ONS fixes the numbers of international migrants from 2021 for the remainder of its projections period (in the case of the 2014 based National Population Projections, this is up to 2114) for the UK and for each Local Authority (in the 2014 based SNPPs up to 2039). The proportion of the UK total for Local Authorities remains the same from 2021. This broad assumption highlights the uncertainty of international migration at a local level and so will need regular monitoring.
UK Migration with the rest of the world is projected to decrease significantly by 2021.

³⁴ <https://www.hesa.ac.uk/data-and-analysis/students/overviews>

8.16. In the same way that UK internal migration must sum to zero, the pool of international migrants is finite, unless the Government is prepared to accept higher net flows to satisfy growth.

Projection scenarios that assume above-trend growth must take extra migrants either from elsewhere in the UK, in which case those migrants should be subtracted from the population from whence they came or taking someone else's share of the international migrant pool. One area's gain is another area's loss unless allowance is made for the net flow of international migrants to increase.

[Contents](#)

9. Housing Completions, Market Signals & Affordability and Specialist Housing Need

Housing Completions

9.1. Housing completions give a good indication of what the capacity for house building is within an area. Figures for West Lancashire are shown in Table 11 and are based on MHCLG Live Tables on net completions (Table 120³⁵) and compared with Local Authority information.

Table 11 - Dwelling Net Completions & Local Authority sourced Completions 2001 to 2018

Year to March	Dwelling Stock	Annual Net Change	Rolling 5 year Average	West Lancs Completions (AMR 2012 & 2018)	2013 Planned Phasing
2001	45,250				
2002	45,590	340		351	
2003	46,140	550		513	
2004	46,440	300		416	
2005	46,840	400		417	
2006	47,060	220	362	202	
2007	47,370	310	356	344	
2008	47,590	220	290	81	
2009	47,750	160	262	130	
2010	47,880	130	208	109	
2011	47,970	90	182	72	
2012	48,210	240	168	250	302
2013	48,340	130	150	139	302
2014	48,710	370	192	370	302
2015	49,080	370	240	237	302
2016	49,380	300	282	268	302
2017	49,700	320	298	309	335
2018	49,890	190	310	236	335

Source: Dwelling Stock: Census 2001, Census 2011, Housing Flows Reconciliation, the Greater London Authority and Regional Assembly joint returns & West Lancashire Strategic Planning Department.

9.2. Average net completions for the 5 years to 2014/15 (Rolling 5 year average column) were 240 dwellings, with a high of 362 in 2005/06 and low of 150 in 2012/13. The 2014 based ONS/MHCLG projections give an annual growth (2012-2037) in dwellings of 169, well within recent completion levels. It is worth noting that the more up to date 2016 based SNPPs and SNHPs, now both produced by ONS show a significant fall in the

³⁵ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/756093/Live_Table_120.xls

numbers of households projected to 129 (equivalent to 132 dpa) for the period 2012 to 2037.

It is clear that MHCLG will have to reconsider how Household projections are interpreted and used when assessing housing need and how to make best use of the new projections.

- 9.3. HEDNA 2.17 "*The adopted Housing requirement in the Local Plan is estimated an annual average of 324 dpa. This is distributed in phasing of 302 dpa for 2012-2017 and 335 dpa for 2017-2027. This is based on the Strategic Housing Land Availability Assessment (2013).*"

West Lancashire have only managed to build above the proposed phasing in two years (2014 & 2015) since the recession and the aggregate build planned for 2012 to 2018 was 2,180 and only 1,920 have been built (net). There is clearly an issue relating to capacity and / or demand.

- 9.4. Even at the 2014 SNHP build rate, there is an issue over a) house building industry capacity and skills shortages³⁶ and b) whatever capacity there may be for growth in the building sector, having simultaneous above-trend growth across the whole of the UK will require a further increase in capacity - are there the skills and manpower available for such nationwide increases?
- 9.5. The Government Inquiry in 2017 into the " Capacity in the homebuilding industry"³⁷ concludes as follows:
- 9.5.1. Large developers had no incentive to increase supply that will impact on profits, and control too large a share of the market.
 - 9.5.2. More help for smaller developers and release of smaller sites would help improve competition.
 - 9.5.3. There are concerns over social renting
 - 9.5.4. Proposed a standard approach to assessing housing need (Technical consultation currently under way)³⁸
 - 9.5.5. Proposed that a new method for assessing affordability should be introduced (now included in the proposed formula for assessing housing need).
 - 9.5.6. Green Belt should only be used in exceptional circumstances (Para 105) though better guidance for Local Authorities is needed.

Market Signals & Affordability

- 9.6. From Section 9 of the HEDNA, there is little evidence of uplift due to market signals and issues with affordability are limited.
- 9.6.1. HEDNA 9.5 Land values are below average for the sub-region
 - 9.6.2. HEDNA 9.6 Median House Prices are above average which reflects the mix of the housing stock (Council Tax bands - West Lancashire 32% at Band D to Band H vs. 21% for the NW - Source Valuation Office Agency Statistics³⁹)
 - 9.6.3. The change in council tax band mix since 2011 shows that new builds are of a higher value than the existing mix, with 47% of the change in Band D to Band H vs. a stock of 32% at Band D to Band H.
 - 9.6.4. HEDNA 9.12 shows the change in longer term house prices is in line with regional average (around 6%)
 - 9.6.5. HEDNA 9.15 Median private rents are slightly above the NW average reflecting the mix of properties in West Lancashire whilst rent increases (2011-16) are slightly below the NW average.
 - 9.6.6. HEDNA 9.17 shows the affordability ratio of lower quartiles of earnings to house prices and again this ties in with the higher value mix of West Lancashire; the ratio

³⁶ <https://www.constructionglobal.com/mission-critical/skills-shortage-uk-construction-industry>

³⁷ <https://publications.parliament.uk/pa/cm201617/cmselect/cmcomloc/46/46.pdf>

³⁸ <https://www.gov.uk/government/consultations/changes-to-planning-policy-and-guidance-including-the-standard-method-for-assessing-local-housing-need>

³⁹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/433412/Table_CTSOP1.0_2015.xls

given is 6.9 for 2015, though from the ONS most recent data, 2015 this was 6.5 (and is currently at 6.8 for 2017 - source ONS ⁴⁰). Warrington and Sefton follow very similar trends and are both above a ratio of 6.

- 9.6.7. HEDNA 9.20 Overcrowding is not an issue in West Lancashire. This also ties in with the higher value mix of properties which will tend to have more bedrooms.
- 9.6.8. Concealed households from the 2001 and 2011 census are both small in number and below the NW and national average.
- 9.6.9. HEDNA 9.24 Table 27 shows 3,412 completions 2002-2015. Both CLG Table 120 and West Lancashire's own figures show a higher number of completions (Table 11 above) 3,830 and 3,630 respectively, closer but still below the target of 3,906.
- 9.6.10. HEDNA 9.32 Table 28 demonstrates how out of touch with reality the methodology is, advocating 540 dwellings per annum. This is noted as "unreasonable" which it clearly is.
- 9.6.11. In spite of its own evidence HEDNA 9.34 states it "*This notwithstanding, the analysis of the housing market signals in West Lancashire suggests that it would be appropriate to consider an uplift to improve affordability in the Borough.*" and goes on to add, what PPG states should be "a level that is reasonable", an arbitrary 10% (HEDNA 9.38) and is on top of a 22% uplift for economic growth (Section 11 considers the implications of the economic growth projections).

West Lancashire has been building roughly to previous targets, has a higher value mix of properties than the surrounding area and has been building higher value properties in recent years. It should be targeting smaller sites and lower value properties that will have the effect of lowering the affordability ratio. Building higher value properties in greater numbers will not help.

Specialist Housing Need

- 9.6.12. HEDNA Section 10 looks at Specialist Housing need
Older Persons
- 9.6.13. The ONS SNPPs and the CLG SNHPs both take account of the ageing population on both terms of numbers and of changing HRRs. HEDNA 10.18 shows the calculation for extra care accommodation due to the increase in the over 75 age group is 57 additional places per annum. However, sheltered accommodation is part of the communal establishment population (See CLG 2014 Methodology⁴¹ Paper) and so some of the increase will already be included in the projections. Figures from the Communal Population from the 2014 SNHPs shows an increase of 978 in the over 75s or 39 pa suggesting the additional need is nearer 18 pa.
- 9.6.14. HEDNA 10.30 shows the additional need for Residential Care. Sheltered accommodation should also be included in this category and not as separate one. In effect, this is double-counting the elderly.

GL Hearn to clarify the status of specialist housing in terms of whether residents are part of the Communal Population, as per CLG definitions or included in the household population.

Student Accommodation

- 9.6.15. HEDNA 10.31 states " Student housing needs will arise principally from growth in student numbers." There is no evidence of any increase at Edge Hill University, in fact overall numbers have declined each year since 2011/12 . Full time students have, however increased and those living in bespoke accommodation should be included as communal population but because ONS keep the numbers of communal population fixed at 2011 census level, these students will be incorrectly adding to the household population. See 5.9.7. and 5.9.8 for further detail.

⁴⁰

<https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoresidencebasedearningslowerquartileandmedian/current/ratioofhousepricetoresidencebasedearningslowerquartileandmedian.xls>

⁴¹

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/536705/Household_Projections_2014-based_Methodology_Report.pdf

ONS are considering a change in methodology to allow for changing levels of student accommodation which will improve estimates for the communal population.

[Contents](#)

10. Jobs Led Projections

- 10.1. GL Hearn used Oxford Economics forecasts to produce projections with the "baseline" assumption of 1.9% growth in Gross Value Added. A second "growth" scenario of 2.5% growth in GVA was also considered, which included inputs from Liverpool City Region, West Lancashire, Halton and Warrington.
- 10.2. Oxford Economics have used their own set of population projections for the Baseline Scenario and the Growth Scenario. It is not clear how OE produce their population projections, nor whether anyone has tested the employment growth figures against the POPGROUP model to assess the impact on dwellings.
The methodology for the OE population projections should to be assessed and tested against other recognised software to ensure consistency between jobs, population and dwellings.
- 10.3. Whilst GVA over the last five years (Income based) gives an average growth of 2.9% (Source ONS GVA ⁴²), when the recession is included, the average GVA growth over the last ten years is 1.7% which perhaps gives a more realistic growth rate.
The assumption that the economy will grow without a recession for the next 25 years is not realistic, but is exactly what these forecasts assume. Certainly in the short term, the proposed level of GVA growth look achievable.
- 10.4. HEDNA 6.6. Table 6 - The OE 'baseline' projection results in 6,000 new jobs and the growth scenario, 6,800. Full Time Equivalents are shown in Table 7 (5,300 and 6,000). It is not clear whether this new growth is based on the current numbers of jobs or the numbers calculated from the SNPPs in 2037.
- 10.5. Looking at the change in the population aged 16 to 74, the 2014 SNPPs show a fall in population of 4,000 between 2014 and 2037 with very little change in the 16 to 44s but large declines in the older working age groups with the 45-54 age group falling by 3,800. Fewer jobs will result due to lower numbers of working age population.
This is why the OE 'baseline' jobs, households and population needs to be checked against the Popgroup model, for example and clarification is needed from GL Hearn to establish the base year from which the numbers of new jobs is calculated.
- 10.6. HEDNA 8.12 West Lancashire the double jobbing ratio is 3.4%. There is no mention of any change to this ratio, so it is assumed it has been held constant over the projection period.
- 10.7. The commuting ratio for West Lancashire is 1.04, which shows a net outflow for work i.e. more people living in the Borough than working there. This ratio has been held constant over the projection period, altered HEDNA 8.14.
- 10.8. Whilst West Lancashire has relatively low unemployment rates relative to the NW HEDNA 4.31, There is no mention of using unemployment rates to boost jobs for West Lancashire.

⁴²

<https://www.ons.gov.uk/file?uri=/economy/grossvalueaddedgva/datasets/regionalgrossvalueaddedincomeapproach/current/qvairerencetables2.xls>

Reducing unemployment rates is a very sustainable way to improve the local economy without any additional infrastructure and should be a policy considered as part of the planning process.

- 10.9. HEDNA 8.26 Table 20 shows the dwelling requirement for adding 6,000 jobs adds 21 dwellings per annum (dpa) and 41 dpa for 6,800 jobs. If this is 6,000 jobs above the SNPP 2014+2015MYE (Inc Adjusted Headship) then this makes no sense at all.

To increase the number of jobs by 6,000, whilst keeping commuting, unemployment and double-jobbing ratios constant, and with slightly declining economic activity rates (HEDNA Figures 27 & 28 - approx 60%) would need approximately 10,300 extra 16+ population and an extra 12,400 total population (16+ make up 83% of the SNPP at 2037). Allowing 2.6% (2037 - 2014 SNPPs) for Communal population and 2.28 persons per household (2037 - 2014 SNPPs), give a net increase of 5,300 households, 5,430 dwellings (using 2.5% vacancy rate) which is 217 dpa. These are *extra* dwellings on top of the 2014 SNPPs / SNHPs of 169 dpa (Table 2, Ch4.3) i.e. more than double the dwellings.

This demonstrates the disjoint between jobs led projections produced using one method (Oxford Economics) and demographic projections for population and households using another (Popgroup). There is a real need to cross-check the figures for all the outputs using the same model to ensure consistency.

[Contents](#)

11. Objectively Assessed Housing Need (OAHN)

- 11.1. The final stage of calculating the Objectively Assesses Housing Need (OAHN) is given in HEDNA sections 12.27 and 12.28 and shown in Table 45. It is built up from the 2014 SNPPs + 2015 MYEs (including the headship uplift) giving 200 dpa plus 21 dpa (for adding 6,000 new jobs) plus 10% affordability uplift (20dpa) giving a total of 241 as the OAHN.
- 11.2. Firstly, Until the numbers of new jobs can be validated and shown to fit in with the projections for population and households then the uplift for that part of the OAHN should be discounted.
- 11.3. Secondly, there is no justification for a headship rate uplift. It is unrealistic given the cohort of students with large debts and the reluctance of developers to build affordable homes.
- 11.4. The use of 2015 MYEs is good practice and in light of 14.2 and 14.3, the OAHN should be simply be based on those projections.

[Contents](#)

12. Suggestions for alternative scenarios and double checking

- 12.1. Any jobs led scenarios from organisations providing jobs led projections (e.g. Oxford Economics, Cambridge Econometrics, Experian) should be checked within the POPGROUP model (or other software if in use) to compare results and examine the impact on Population and Households/Dwellings. This is in line with PPG paragraph 2a-018 which suggests that "Evidence that links demographic change to forecasts of economic growth should also be assessed".
- 12.2. Test Scenario 1. Use the Oxford Economics baseline and growth scenario populations and run it within POPGROUP, if available, to see what numbers of a) households and b) jobs are produced to compare with the ONS/MHCLG 2014 based projections.

- 12.3. Test Scenario 2. Use the Oxford Economics number of new jobs for both scenarios as the target within POPGROUP, if available, to see what numbers of a) households and b) population are produced to compare with the ONS/MHCLG 2014 based projections.
- 12.4. In each case, the Economic Activity Rates should come from the Office for Budgetary Responsibility (OBR) projections as supplied by Edge Analytics (POPGROUP licence holders⁴³). Assumptions on commuting rates and unemployment can also be set to match Oxford Economics', though note that the Unemployment rate should not be just be the claimant count rate but should include those available and willing to work.
- 12.5. The purpose of these Test Scenarios is to challenge the robustness of the two models (Oxford Economics and POPGROUP). The relationship between changes in population, households and jobs should be similar across the two models. POPGROUP has had significant investment in aligning the methodology with ONS and MHCLG so that official projections can be replicated and any move away from the official trends are transparent both in terms of input and output. This provides the POPGROUP user with the ability and confidence to easily track changes. Less is known about the Oxford Economics model.

[Contents](#)

13. [Longer term planning and Unmet need](#) [Longer term planning](#)

- 13.1. The West Lancashire Local Plan Preferred Options, August 2018 outlines the strategic policy for housing up to 2050 (Policy SP2⁴⁴) and shows phasing patterns for 2012-19 (271 dpa) 2020 to 2027 (396 dpa) and 2027 to 2050 (475 dpa). All but the initial phasing are within the recent completion numbers.
- 13.2. Looking as far forwards as 2050, from a demographic viewpoint, is too far ahead to give sensible figures. ONS warn that "*Projections become increasingly uncertain the further they are carried forward. In the longer-term, demographic patterns are increasingly likely to differ from recent trends. This is particularly so for smaller geographical areas and detailed age and sex breakdowns.*"⁴⁵
- 13.3. ONS analysis on the accuracy of sub national population projections "*the main findings are that the projections are less accurate for smaller geographical areas and when the period between the projection and the reference year (2011) increases*"⁴⁶ i.e. projections closest to Census year are the more accurate as MYEs include errors that are corrected every ten years.
- 13.4. Shelf life of SNPPs in England by Professor Ludi Simpson⁴⁷ shows that the smaller the area (population size) the higher the error. For Shire Districts (see Table 3) it estimates that after 10 years, you can be 80% sure the projections are within 6% of the forecast, at 20 years it is 11%.

⁴³ <http://www.edgeanalytics.co.uk/popgroup.php>

⁴⁴ <https://www.westlancs.gov.uk/media/544362/master-lpr-po-v41-final.pdf>

⁴⁵ <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/subnationalpopulationprojectionsforengland/2016based/pdf>

⁴⁶ <https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/populationandmigration/populationprojections/methodologies/subnationalpopulationprojectionsaccuracyreport/snppaccuracyreportfinaltcm774144461.pdf>

⁴⁷ <http://hummedia.manchester.ac.uk/institutes/cmist/archive-publications/working-papers/2018/Simpson%20Wilson%20Shalley%202018%20The%20shelf%20life%20of%20subnational%20projections%20CMI%20paper%2004%20Sept2018.pdf>

- 13.5. West Lancashire Local Plan Review Technical Paper 1: Strategic Development Options and Site Allocations, September 2018 ⁴⁸ outlines the options, one to 20.
(Note: References to this document are preceded by "TP1")
- 13.5.1. The decision to make the Local Plan period 2012 to 2050, see TP1 2.16 "...the Council has decided upon the second option and intends to prepare a new Local Plan which will cover the period 2012-2050 which will mean that sufficient land is allocated for development for that entire period and no Safeguarded Land or phasing of any sort will be required."
- 13.5.2. TP1 2.6: The growth in housing demand that would arise from a successfully implemented Skelmersdale Rail Link. (TP1 2.33 - Adds 48 to dpa).
- 13.5.3. TP1 2.6: The growth in housing demand that would arise should West Lancashire take a share of the wider LCR need for large-scale B8 uses (which was calculated through the SHELMA at a LCR level, but not disaggregated to local authority level) (TP1 2.34 - Adds 72 dpa)
- 13.5.4. TP1 2.35 - West Lancashire have simply added the 48 and 72 dpa from above to the existing Local Housing Need calculation of 212 dpa. Taking ONS projections beyond their limit (2039 for the 2014 base) is highly risky.
- 13.6. There are no workings from GL Hearn to assess or comment on the impact of the extra dwellings on the population. Where are the residents for the new jobs and households going to come from? As suggested in TP1 2.48 " West Lancashire must be drawing job growth from the LCR and, with that job growth, the housing need". West Lancashire will be drawing in above-trends levels of growth in terms of population, while at the same time, all the other Local Authorities are planning for extra growth and will be assuming they can take some residents from West Lancashire.
- 13.7. A different approach is needed where all the potential migrants from a region or sub-region can be distributed in a way that balances migration - all movements from within an Planning Area, be it a Local Authority, an HMA, Combined Authority or County will cancel each other out with no net change overall. To grow as an area, migrants from outside have to be drawn in and those migrants themselves are needed to satisfy growth elsewhere at the same time.
- Unmet need beyond 2027**
- 13.8. As a result of the rejection of land at Switch Island in Sefton and limited availability of suitable sites in Sefton, West Lancashire is planning on the basis that it will have to take some of that unmet need.
- 13.9. The unmet need from Sefton is calculated as follows TP1 2.41 "42.5% of households in Sefton were in Southport and Formby at the 2011 Census, and in the absence of any more robust method of assessing need in the north of Sefton post-2027, it would be appropriate to assume that 42.5% of that Sefton-wide requirement (14,720 dwellings) would be the unmet housing need arising from Sefton post-2027, i.e. 6,256 dwellings." and the 14,720 figure comes from Sefton's annual currently assessed need of 640 dpa (TP1 2.40)
- 13.10. TP1 2.40 - Assuming continuing growth, above trend, without recession all the way to 2050 is not what the SNHPs are designed. Planning that far ahead should be a paper exercise and no-one can know or guess what the circumstances will be in 10 years from now, let alone 32 years.

⁴⁸ <https://www.westlancs.gov.uk/media/544510/tp1-strategic-development-options-and-site-allocations-final.pdf>

- 13.11.3.27 - Suggests a location for the unmet need. *"Ormskirk and Aughton is the most sustainable of these areas and arguably has the greatest connection to Southport and Formby, and so it is appropriate that a significant proportion of the unmet need from the LCR is met in that sustainable location, with lesser proportions being met in Burscough and Central Parishes and the eastern part of the Northern Parishes."*
- 13.12. Extra housing for the new rail link and the B8 land for employment at J3 of the M58 should fall in Skelmersdale as well as 1,800 from the unmet need from the rest of the LCR, and that the remaining 1,696 should be sited at " *Western Parishes (20%), Ormskirk and Aughton (45%), Burscough and the Central Parishes (25%) and the Northern Parishes (10%), with the proportions reflecting the relative sustainability of the areas, constraints to development and their connectivity to the north of Sefton in housing market terms.*" (3.31 and Table in 3.32). So Aughton and Ormskirk are allocated 763 dwellings, around 30 dpa between them and more detail is given in 4.14 to 4.21
- 13.13. TP1 5.2 acknowledges the over ambition of delivering 421 dpa but West Lancashire Borough Council claim that there will be a surge in completions after 2018. The figures do seem to be at odds with the figures from the HEDNA (March 2017), where the OAHN is 241 dpa (and INCLUDES 6,000 new jobs). This implies an extra 180 dpa for policy-on options which would appear to be highly ambitious. 180 extra dpa would add approximately 16,000 more residents, and require another 7,500 to 8,000 MORE jobs for the period 2012 to 2050.
- 13.14. It is not clear how many of the additional dwellings in TP1 are accommodated by the increase in jobs from OE, nor is it shown how many jobs result from the 2014 SNPP/2015 MYE population projections BEFORE the additional 6,000 jobs are added.
These numbers need clarifying to ensure consistency.

[Contents](#)

Glossary

A8 - EU Accession Countries. Czech Republic, Estonia, Hungary, Latvia, Lithuania, Poland, Slovakia, Slovenia

BME - Black and Minority Ethnic

BSPS - British Society for Population Studies

CLIP - Central and Local Information Partnership

CPRE - Campaign to Protect Rural England

DWP - Department for Work and Pensions

GM - Greater Manchester

GMSF - Greater Manchester Spatial Framework (

GVA - Gross Value Added which is the increase in the value of the economy due to the production of goods and services.

HESA - Higher Education Statistics Agency

HRR - Household Representative Rates = Headship Rates

HMRC - Her Majesty's Revenue and Customs

LAMI - Local Authority Migration Indicator (ONS Tool for Migration analysis)

LPEG - Local Plans Expert Group

LTIM - Long Term International Migration

MHCLG - Ministry for Housing, Communities and Local Government

MYEs - Mid Year Estimates (ONS)

NINO - National Insurance Number

NOMIS - National Online Manpower Information System (ONS)

NRS - National Records Scotland

NPP - National Population Projections (ONS)

NPPF - National Policy Planning Framework

OAHN - Objectively Assessed Housing Need = OAN

OBR - Office for Budgetary Responsibility

OE- Oxford Economics

ONS - Office for National Statistics

PASC - Public Administration Select Committee

POST - Parliamentary Office Science & Technology

RFMYEs - Rolled Forwards Mid Year Estimates (ONS)

SHMA - Strategic Market Housing Assessment

SHLAA - Strategic Housing Land Availability Assessment

SNPPs - Sub-National Population Projections (ONS)

SNHPs - Sub-National Household Projections (MHCLG)

T&CP - Town & Country Planning

TP1 - West Lancashire Local Plan Review Technical Paper 1: Strategic Development Options and Site Allocations, September 2018 ⁴⁹

UPC - Unattributable Population Change

[Contents](#)

⁴⁹ <https://www.westlancs.gov.uk/media/544510/tp1-strategic-development-options-and-site-allocations-final.pdf>

Appendix 2.0 Experience

Jackie Copley MRTPI MA BA(Hons) ad PgCERT

Professional Qualifications

190. Jackie Copley has been a chartered member of the Royal Town Planning Institute, since November 2000. She has a Masters in Town and Regional Planning, 1999 from Leeds Metropolitan University, a Bachelor of Arts from the University of Manchester 1992, and a Postgraduate Certificate in Urban Design, 2012 from the University of Salford. The focus of her masters was on place marketing.

Experience

191. In the public sector she held planning roles focused on the implementation of brownfield regeneration schemes in deprived inner areas of Manchester and Salford. She supported area wide master planning, the production of a City-wide design guide for Manchester and a number of site briefs. She helped bring brownfield land back into valued use in Salford Quays holding positions at Salford Quays as the Lowry Millennium project, Watersports Centre and Metrolink were on site. She supported the regeneration of Hulme, Manchester and Ordsall, Seedley and Langworthy in Salford through various estate renewal funding initiatives. She helped deliver a wide range environmental, physical, economic and social investment projects aimed at alleviating deprivation and making more effective use of wasted land.

192. In private planning consultancy she led regeneration and economic development research projects and managed multi-disciplinary teams on a variety of planning topics including transport, retail, tourism, housing and economic development, and brownfield regeneration. She advised clients, including local planning authorities on the most suitable site allocations for a variety of employment uses, and housing delivery, both in urban and rural contexts. She gave planning advice to a variety of clients including Transport Executives, English Partnerships, Homes and Communities Agency, North West Regional Development Agency, Local Planning Authorities, regeneration partnerships and to developers. She held positions on grant funding panels and managed a range of funding types.

193. Since working for the CPRE Lancashire she has developed expertise in rural planning matters and has responded to a great many local plan consultations, has critically reviewed evidence bases and has appeared at Examination in Public. She has worked to CPRE policy, which is not anti-development per se, rather concerned to prevent needless harm to land in countryside, and she has successfully convinced examiners of the case to reduce development to prevent unjustified Green Belt release. She has objected to damaging planning applications where harm outweighs benefit in open countryside and protected Green Belt land. She has expertise in neighbourhood planning and other rural planning, economic, social and environmental issues.