

My Reference WW/374

Dear Madam,

The LGA has circulated me with a copy of your consultation letter of 9th June. Having missed this on its first issue, I am aware that this response is late. However, I note that at one point, in discussing the issues relevant to your work, you say:

“Regional Planning Guidance sets out the volume of new housing needed in each region. This is then translated into allocations for each local planning authority. In many instances, especially in regions of high demand, the actual number built falls short of that planned.”

You should be aware that, for a variety of reasons, the information on the number of dwellings built which is issued by ODPM is incorrect. There is an inherent undercounting, resulting from the use of building control returns. In the case of the Bournemouth, Dorset and Poole Structure Plan area, the ODPM annual local housing statistics table 1b gives a figure of 10,350 completions for the period 1996-2001. This is substantially below RPG targets. The planning authorities' own annual completions survey shows the gross completions for this area to be 15,378 over the same period – that is, in line with RPG and in fact slightly ahead. As you can see, the discrepancy between the two sets of figures is very great.

I believe the same is true at the regional level. A report to the Executive Committee of the South West Regional Assembly by Dr Keith Woodhead notes that the government's Communities Plan states that in 2001 'only about 70% of the [RPG target of 20,200] new homes was being met', while the Assembly's monitoring system showed that actual completions were running at within 3% of target.

I am concerned that one of the fundamental assumptions underlying your study may be unreliable, if the understanding of house building levels is indeed based on the ODPM figures.

Yours sincerely

William Wallace