

Session 2 – Tuesday 27 September 2022 (to follow Session 1)
Matter 2
Housing Need, Requirement and Supply

Issue 1: Housing Need and Requirement

Policies to be covered by Matter 2: Policies SP1 and HP1

Main Evidence Base

SDPR01 – Publication draft Schedule of Revisions to the Wyre Local Plan (2011-2031) [November 2021]

EDPR02 – Implementation of Policy LPR1 Background Paper [November 2021]

EDPR03 – Housing Implementation Strategy Partial Review [November 2021]

EDPR04 – Authorities Monitoring Report

1. In principle and taking into account the contents of the WLP, is it justified for the WLPPR to use the standard method as a basis for the housing requirement¹ rather than undertaking a new housing needs assessment?

CPRE agrees that a regular review of local plan policies is helpful to ensure identified housing and jobs needs are met and our natural and built environment are best protected by steering development to the most sustainable locations.

Importantly, CPRE has repeatedly informed the Government¹ that its ‘Standard Method’ is based on flawed assumptions about supply and affordability, which do not bear out in reality. This is because a house is not only a place to dwell but is also a form of investment. The Government will not listen as it chooses to listen to the housebuilding sector. It is important that the public understands how housing requirements are calculated, as often local planning authorities are wrongly blamed.

CPRE has also articulated that the Government’s mandated use of ONS 2014 based population, which are based on ‘unusually high’ rates of growth is wrong. It results in the over planning of houses, across the country, and is ‘needlessly’ accelerating the loss of green fields in countryside, including protected Green Belt.

CPRE argues that more recent datasets such as ONS 2016, 2018, 2020 and Census 2021, which evidence how excessive the 2014 dataset figures are. The Census 2021 shows that Wyre (area code E07000128) had 111,900 people, females 57,500 and 54,400 males.

Government’s own best practice is to use up-to-date data to inform local plan evidence bases, which it ignores. This is not a sound approach to town and country planning.

¹ The WLPPR uses the standard method for the period 2019/20 to 2030/31

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To illustrate, CPRE's recent research 'Set up to fail: *why housing targets based on flawed numbers threaten our countryside*' found that in effect the guidance asks local authorities to base their plans on aspiration rather than need. The result is that requirements are based on made-up numbers that the construction industry has neither the capacity, nor will, to meet. The situation is then made worse because where the Council fails the Housing Delivery Test the protection for land not allocated in the local plan – no longer applies. The result is that Government's national policy is compelling local authorities. Developers are then able to pick the most profitable sites, usually greenfield ones. However, they do not necessarily have the motivation or capacity to build faster. Building rates stay low; housing targets are missed; countryside is needlessly lost: the worst of all worlds.

<https://www.cpre.org.uk/wp-content/uploads/2019/11/set-up-to-fail-why-housing-targets-based-on-flawed-numbers-threaten-our-countryside.pdf>

CPRE contends it is important to keep the housing requirement at a reasonable level and although it welcomes the reduction from 9,200 dwellings to 7,232 dwellings, it queries given the over supply of housing in Wyre, and neighbouring geographies, as shown in Table 1 below, whether there is good reason to reduce the requirement even further to take unnecessary pressure of Wyre's remaining green fields.

Table 1: Housing Delivery Test, 2021

ONS Code	Area Name	Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2021 measurement	Housing Delivery Test: 2021 consequence
		2018-19	2019-20	2020-21		2018-19	2019-20	2020-21			
E07000125	Rossendale	208	180	127	515	123	94	77	294	57%	Presumption
E07000121	Lancaster	400	376	273	1049	302	701	430	1433	137%	None
E07000118	Chorley	418	382	278	1078	573	640	306	1519	141%	None
E07000128	Wyre	317	282	197	796	406	375	620	1401	176%	None
E07000119	Fylde	287	252	181	719	471	634	292	1397	194%	None
E07000122	Pendle	153	134	97	383	314	208	348	870	227%	None
E07000126	South Ribble	209	189	127	525	437	412	424	1273	243%	None
E07000127	West Lancashire	204	181	129	513	323	616	455	1394	272%	None
E06000009	Blackpool	108	104	81	293	368	335	161	864	295%	None
E06000008	Blackburn w D	157	146	103	406	485	303	484	1272	313%	None
E07000120	Hyndburn	60	53	37	151	174	167	191	532	353%	None
E07000124	Ribble Valley	153	136	95	383	403	559	453	1415	369%	None
E07000123	Preston	234	221	166	621	785	747	909	2441	393%	None
E07000117	Burnley	66	58	41	165	251	165	298	714	434%	None

2. If the use of the standard method is justified, for what period should it apply?

CPRE recommends 3 years.

There have been indications from Government that changes are likely to occur through the Levelling-Up Bill, which has been delayed due to the change in Prime Minister. CPRE successfully campaigned to fight off the Planning White Paper, which threatened democracy and our countryside, and we will continue to work in coalition with other environmental organisations to lobby for reforms that will make the system more effective and more sustainable. We want justified development to be steered to the right locations for the right reasons, focusing on the reuse of brownfield land in our towns and cities.

3. Taking into account that the standard method should be taken as the minimum, do the circumstances exist to support an uplift on the housing figure derived from the standard method?

CPRE does not think there is a justification for an uplift.

See comments in answer to question 2.

4. For example, should the housing requirement be increased to take into account economic growth aspirations, strategic infrastructure improvements, choice, and competition in the housing market, and/or affordable housing need?

Brexit has caused a -15% shrinkage in economic growth, Covid -2% and there are ongoing economic uncertainties due to the Russian aggression causing high levels of inflation.

Brexit trade deals are unlikely to be resolved any time soon.

There is also an energy crisis due to the monopoly of the energy companies over the market. The crisis looks like it will be for an extended period of time as the Government has lifted the moratorium on fracking. CPRE was involved in the planning process and met Cuadrilla, the Oil and Gas Authority and the Environment Agency many times. Fracking cannot be undertaken safely in the Bowland Shale due to its highly faulted and fractured nature. Cuadrilla recognised this and never actually fracked (defined by volumes of frack fluid) and it has handed back its licence. Fracking is unviable as it costs more than £1 to exploit a £1 of gas. It is only possible with Government subsidy. Fracking is completely unsustainable, and it leads to more burning of fossils. Fossils should be kept in the ground. We are in a climate and biodiversity crisis of human making and related to fossil use. The Government must invest in cleaner technologies to protect rural areas and reduce energy bills in the future.

5. Do recent levels of delivery in the Council area justify a higher housing requirement?

No. The recent bubble relates to house builders speculatively applying for consent on farmland not intended for development in advance of the local plan being adopted.

6. How should the 380 dwellings provided through the Fylde LP Partial Review to meet Wyre's needs be accounted for?

Wyre successfully achieved 176% delivery against the housing target and Fylde 194% and Blackpool 295%. This is a consequence of major housing developments applied for on a speculative basis across the geography. The oversupply necessitates a reduction in the housing requirement going forward.

² EDPR03 shows delivery at an average of around 478 dpa for the five-year period of 2016/17 to 2020/21

Issue 2: Implications of the housing requirement

7. Have the implications of using the reduced housing requirement for the Plan strategy as a whole been taken into account?

The reduced housing requirement will still provide enough houses that are identified as needed.

8. In particular

(a) Will the Plan as reviewed deliver the affordable homes needed?

The Government's definition of affordable housing is rejected by CPRE as most people cannot afford 80% of market values. This is particularly true in rural areas, where property prices have rocketed compared to wages, which are typically low.

Discounted market housing is only affordable at the single point of sale and not in perpetuity.

Genuinely affordable housing is not delivered on greenfield land as developers renege on agreed contributions due to viability claims. Mixed tenures and social rent are more likely to be affordable to the least well-off households. The local plan needs to ensure in perpetuity affordable housing.

(b) Will the reduced figure constrain jobs and economic growth, including in connection with initiatives such as the Hillhouse Enterprise Zone?

No there is no constraint to growth as there is an adequate supply of houses identified. Of course, landowning interests will argue differently.

9. Would an alternative housing requirement figure, e.g., 479 dpa, be justified, based on up-to-date evidence?

There is no reason the housing figure should be inflated. Please see reference to CPRE research Set up to Fail, mentioned in answer to question 1 above.

10. What implications would there be for the WLP and WLPPR, if an alternative housing requirement figure was justified?

CPRE recommends a housing requirement based on up-to-date CENSUS 2021 data.

The WLP includes a requirement to deliver a minimum of 43 hectares of employment land between 2011-31 reflecting the Objectively Assessed Employment Need. The WLPPR does not propose any changes to the employment land requirement.

11. Should the employment land requirement be amended taking into account the reduced housing requirement?

No. CPRE recommends the employment requirement stays the same as it is adequate as it is. There should be recognition that land in farm production is important to the rural economy, and jobs in agriculture. The UK needs food security, especially at the current time with Russia threatening supply chains.

12. Are there any significant implications for the soundness of the Plan, if the employment land requirement is not altered?

No.

Issue 3: Housing Supply

13. Will the up-to-date housing supply position be clearly shown in the Plan (base date of 31 March 2022)?

14. Is there any evidence that allocations in the WLP overall are not coming forward as projected?

CPRE is not aware of any evidence, the Housing Delivery Test performance suggests there are no such issues, rather an over supply of non-local plan sites, due to Government approvals, contrary to its claims to protect land in the countryside and support to farmers.

15. Does the evidence base support the Council's housing supply position, including the existence of a 5-year housing supply?

CPRE recommends that the WLP identifies all brownfield and other reasonable alternatives.

Below are the issues concerning reasonable alternatives.

- Allowance for Net Conversions and Changes of Use – due to the Covid pandemic, changes in retail and other market uncertainties, such as Putin's illegal invasion of Ukraine, more buildings are becoming vacant and are available for reuse. The Government has loosened permitted development rights to support the reuse of empty buildings for housing and therefore the allowance for net conversions and change of use should be increased.
- Allowance for windfalls – from a previous precursory investigation of the Brownfield Registers revealed some sites that had not been included as 'suitable' sites. All Councils are required to have an accurate and up to date record of suitable brownfield sites. The windfall allowance should be increased.
- Empty Homes – there should be inclusion of an allowance of more than 10% for the return of empty homes, the 'Places for Everyone' JDP may underplay the level of housing vacancy.
- Missed opportunities – JDP misses opportunities such as achieving higher density development, securing residential conversion in empty property in town centres, and misses not only vacant brownfield sites, but those still occupied but under-used that are likely to

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come forward during the plan period and, which are important for the revitalisation of settlements across Wyre.

16. On the basis that the housing requirement remains as set out in the WLPPR, is there likely to be insufficient or too much flexibility in the supply?

CPRE recommends any surplus land be put back into countryside policy protection or Green Belt as appropriate.