

Local Plan Review – Housing Numbers

Briefing Note No. 23-16

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This briefing note has been prepared in advance of the publication of the emerging Local Plan Review (LPR), so that Members are informed about the way in which housing land requirements are calculated and any implications emerging from government changes to the National Planning Policy Framework (NPPF).

Local authorities have a statutory duty to make sure that they are planning for sufficient homes to meet the need for their area. For the period 2020-2038, Wiltshire needs to provide for sufficient land to deliver 36,738 homes. The LPR will only be allocating enough land that is absolutely required. It will take account of homes that have already been built since 2020 and committed (including housing with planning permission or allocated within existing plans that are not yet built), together with other sources of new housing supply that will be provided over the plan period. These include Neighbourhood Development Plans, windfall sites, as well as new LPR allocations. For the LPR to withstand the scrutiny at Examination in Public, the council will need to be confident that sites will come forward during the Plan period and deliver sufficient homes, of the right type, to meet the projected need.

Between 22 December 2022 and 2 March 2023, the government sought views on how it might develop new national planning policy to support its wider objectives. Within that consultation, the government had indicated that changes would be introduced in the spring of 2023. This included a proposal to introduce new flexibilities to meeting housing needs. Related to this, paragraphs 7 and 8 of the consultation¹ stated:

Introducing new flexibilities to meeting housing needs

7. We propose making the following changes to take effect from spring 2023:

8. **Using an alternative method:** local authorities will be expected to continue to use local housing need, assessed through the standard method, to inform the preparation of their plans; although the ability to use an alternative approach where there are exceptional circumstances that can be justified will be retained. We will, though, make clearer in the Framework that the outcome of the standard method is an advisory starting-point to inform plan-making – a guide that is not mandatory – and also propose to give more explicit indications in planning guidance of the types of local characteristics which may justify the use of an alternative method, such as islands with a high percentage of elderly residents, or university towns with an above-average proportion of students. We would welcome views on the sort of demographic and geographic factors which could be used to demonstrate these exceptional circumstances in practice.

¹ Chapter 4, Levelling Up and Regeneration Bill: reforms to national planning policy, DLUHC (December 2022)

The consultation suggests that government intends to dilute the requirement for Local Planning Authorities to use the standard method for calculating housing need, and instead allow greater discretion by stating that this is not mandatory and that it only forms the starting point to inform plan-making. This headline has been incorrectly interpreted by some to mean that councils can take a more relaxed approach to planning for future housing growth. However, this is not the case.

The government has repeatedly stated that it remains committed to increasing the number of homes built and to boosting the housing supply. This includes an aspiration to deliver 300,000 new homes each year – a manifesto pledge that has been diluted from a ‘mandatory’ to an ‘advisory’ commitment. The proposed changes to the NPPF, if taken forward, retain government policy to boost housebuilding, and a commitment to continue to build more homes in more sustainable locations, with discretion to provide less in areas that are most heavily constrained.

While the details of any changes and the timescales for when these would be introduced remain uncertain, it is not anticipated that this would make any material difference to the number of homes that Wiltshire needs to plan for. This is because the changes that have been proposed are expected to introduce greater flexibility to reduce housing numbers in areas that simply can’t meet their need without eroding sensitive landscapes and protected areas – for instance, those areas that have large areas of Green Belt protection. It is expected that the “exceptional circumstances” will only apply to a small proportion of local authorities. Those more constrained authorities will need to prepare objective evidence to demonstrate why they are planning for a figure that is below their housing need figure.

While parts of Wiltshire are constrained by important and sensitive landscapes, this does not apply across the whole of the county. Work on the emerging LPR suggests that sufficient land can be found in the county to meet Wiltshire’s objectively assessed housing need in a sustainable way. This emerging strategy will be presented in the report to Cabinet in July 2023.

Irrespective of changes that may or may not be introduced by government, it is important to remember why Wiltshire Council is preparing a new Local Plan and needs to get an up-to-date Plan in place as soon as possible:

- The LPR is one of the most important strategic documents for Wiltshire Council.
- Local Authorities have a statutory duty to renew their Plan every five years and should have an up-to-date plan. Wiltshire’s Local Plan is already eight years old.
- The lack of an up-to-date Local Plan is harming the council’s ability to plan for the right growth, in the right locations.
- A new Local Plan will help the council to meet its zero carbon aspirations for all future developments.
- Failure to have an up-to-date Local Plan affects the council’s five-year housing land supply, encouraging speculative development.
- Lack of progress on updating the Local Plan puts the council at risk of having its planning powers removed through government intervention.
- A new Local Plan will allow the council to secure high-quality development, in keeping with the county’s heritage and setting.
- The LPR will deliver a choice of housing types, including affordable homes, to meet future housing needs and not leave this to speculative housing developers.
- The LPR delivers much more than housing. It secures high-quality employment space for businesses, providing jobs for local people. It protects historic buildings. It supports towns, villages, and the rural economy. It provides facilities to enhance the visitor economy. It delivers

roads, schools, and other infrastructure. It protects our most valued open spaces. It provides the basis for securing government funding and delivering ambitious regeneration.