

Wokingham BC's plan to build 856 houses per year is "sound"

*Briefing for the committee of the Great Langborough Residents' Association
David Nash, Secretary: 20 November 2016*

Given the reaction to Cllr. Gary Cowan's resignation of the Conservative whip in Wokingham Borough Council and the reasons reported in the web site of the Wokingham Paper¹, I decided to produce this brief.

Why has Wokingham Borough Council set a new housing target?

The abolition of mandatory targets laid down by central government has created a false impression that local authorities have complete freedom to set their own. Yes, in theory, they do. However, in practice, the Local Plans must be what is described as "sound". This simple word seems harmless enough, until you understand the consequences of having a Local Plan that can be judged to be "unsound" in any important aspect. This applies particularly to housing targets and the allocation of land for development.

The National Planning Policy Framework (NPPF) sets it out as follows²: -

To boost significantly the supply of housing, local planning authorities should:

- *use their **evidence base** to ensure that their Local Plan meets the full, **objectively assessed needs** for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including **identifying key sites which are critical to the delivery of the housing strategy** over the plan period;*

A parliamentary briefing explains this as follows: -

*Despite the abolition of national targets, LPAs (Local Planning Authorities) are encouraged to calculate their own housing figures and set aside enough land to satisfy housing demand. Although not mandatory, LPAs are encouraged by Government to have a Local Plan adopted, following examination by a planning inspector, which sets out housing need in the particular area. The Government does not want to lay down in detail the method of calculating housing need. **The estimate, however, needs to be based upon robust evidence in order to be approved by the planning inspector.**³*

So, now we understand!

The local authority can set its own targets – **but the Local Plan and its targets have to be approved as "sound" by the planning inspector.** Developers sometimes submit a planning application that does not conform to the Local Plan. If the choices made in the Local Plan can be shown on appeal to be "unsound", the decision of the appeal inspector is likely to support the developer. Then the local authority has lost control of development, with subsequent hazards to the rest of the plan – including health provision, education and road infrastructure.

¹ Wokingham Paper web site 18.11.2016, <http://www.wokinghampaper.com/conservative-councillor-quits-go-independent/>

² NPPF Chapter 6 para 47 <http://planningguidance.communities.gov.uk/blog/policy/achieving-sustainable-development/>

³ <http://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN03741>

As the Wokingham Borough Council web site explains it⁴: -

In England, there is a 'plan-led' system, which means that all proposals for development that require planning permission will be considered in the first instance against the Development Plan for the Borough. The Local Plan Update will in time become part of the Borough's Development Plan.

An important government Planning Policy Statement is quite clear on this⁵: -

Soundness

To be "sound" a DPD should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

"Justified" means that the document must be:

- *founded on a robust and credible evidence base*
- *the most appropriate strategy when considered against the reasonable alternatives*

What is the National Policy?

The Parliamentary Briefing⁶ summarises it as follows: -

It is generally accepted that not enough new homes are being built to meet growing need. February 2015 [housing projections](#) indicated that 220,000 additional households will be formed each year up to 2022. This exceeds the number of homes built in recently by a considerable margin – in the 12 months ending September 2014, 117,070 houses were completed.

The House of Commons [Communities and Local Government Committee](#) has raised concerns, alongside others, that NPPF provisions relating to the viability of housing land are "leading to inappropriate development." There is mixed reaction from planning professionals as to whether the provisions in the NPPF are working successfully to boost housing supply.

The Government aims to increase housing supply and access to home ownership. A number of policies to boost housing supply were set out in the [Conservative Party 2015 Manifesto](#) and have now become part of the [Housing and Planning Act 2016](#), including provision to allow an element of housing to be consented as part of the nationally significant infrastructure project process.

⁴ WBC FAQ on Local Plan Update

⁵ PPS 12 p.24 para .2

⁶ <http://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN03741>

But why has the target risen to 856? The current plan number is 661.

Well, yes. The current Local Plan that applies to March 2026 includes this lower target.

However, in preparation for the new Local Plan that will extend to 2036, all local authorities had to update their understanding of housing demand. Two neighbouring Housing Market Areas⁷ (HMAs) commissioned a combined study of future demand.

The resulting Strategic Housing Market Assessment (which Gary Cowan describes as “a dubious technical survey”) was published in February 2016. (Note: *published* – it is now the most current **evidence**)

The reassessment⁸ showed a forecast demand considerably in excess of the annual figure in the existing plan.

Table 139: Conclusions on Full Objectively-Assessed Housing Need by OAN, 2013-36

	2012-based Household Projection (adjusted to reflect 2013 MYE)	London Uplift	Economic Uplift	Reversing Suppressed Household Formation	Improving Affordability	OAN (Homes per annum)
West Berkshire	537	14	35	32	47	665
Reading	541	68	33		57	699
Wokingham	680	18	86		72	856
Bracknell Forest	535	24	0	32	44	635
Western Berkshire HMA	2,293	124	154	64	220	2,855
RBWM	657		0		55	712
Slough	875		0		52	927
South Bucks	339		0		37	376
Eastern Berks & South Bucks HMA	1,871		0	0	144	2,015
Study Area	4,164	124	154	64	364	4,870

So, the latest published evidence contains a new estimated annual demand of 856 per annum!!

Wokingham BC cannot ignore this. In formulating the new Local Plan to 2036, this has to be the new target reflected in the plan. Otherwise, the plan will be judged as **unsound**.

⁷ <https://www.gov.uk/government/publications/housing-market-areas>

⁸ Berkshire (including South Bucks) Strategic Housing Market Assessment February 2016
<http://www.wokingham.gov.uk/planning-and-building-control/planning-policy/evidence-topic>