



Summary proof of evidence of Ben Pycroft BA (Hons), Dip TP, MRTPI in relation to housing land supply

Residential development of up to 100 no. dwellings – Land
rear of Oakdene, Chain House Lane, Whitestake,
Lancashire

for Wainhomes (North West) Ltd

Emery Planning project number: 18-294

PINS ref: APP/F2360/W/19/3234070

LPA ref: 07/2018/9316/OUT

Project : 18-294
Site address : Land rear of Oakdene,
Chain House Lane,
Whitestake, Lancashire
Appellants : Wainhomes (North West)
Ltd
Date : 16th February 2021
Author : Ben Pycroft

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1. Introduction and summary

- 1.1 This summary proof of evidence is submitted on behalf of Wainhomes (North West) Limited (i.e. the Appellant) in support of its appeal against the decision of South Ribble Borough Council to refuse to grant outline planning permission for the erection of up to 100 dwellings at land to the rear of Oakdene, Chain House Lane, Whitestake, Lancashire (LPA ref: 07/2018/9316/OUT).
- 1.2 This summary and my main proof of evidence specifically address matters relating to housing land supply. It should be read alongside the proof of evidence prepared by Mr Harris, which deals with all other planning matters in relation to the appeal.

Qualifications

- 1.3 I am Benjamin Michael Pycroft. I have a B.A. (Hons) and postgraduate diploma in Town Planning from the University of Newcastle-upon-Tyne and am a member of the Royal Town Planning Institute. I am a Director of Emery Planning, based in Macclesfield, Cheshire.
- 1.4 I have extensive experience in dealing with housing supply matters and have prepared and presented evidence relating to five year housing land supply calculations at several Local Plan examinations and public inquiries across the country. I prepared and presented evidence in relation to five year housing land supply on behalf of the Appellant at the first public inquiry into the appeal in November 2019.
- 1.5 I understand my duty to the inquiry and have complied, and will continue to comply, with that duty. I confirm that this evidence identifies all facts which I regard as being relevant to the opinion that I have expressed and that the Inquiry's attention has been drawn to any matter which would affect the validity of that opinion. I believe that the facts stated within this proof are true and that the opinions expressed are correct, and comprise my true professional opinions which are expressed irrespective of by whom I am instructed.
- 1.6 I provide this summary, my main proof of evidence and a set of appendices. I also refer to several core documents and the statement of common ground regarding housing land supply matters.

2. South Ribble's Five Year Housing Land Supply

2.1 Paragraph 73 of the Framework states:

“Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies or against their local housing need where the strategic policies are more than five years old.”

2.2 Footnote 37 of the Framework explains that unless the housing requirement set out in the strategic policy has been “*reviewed and found not to require updating*”, local housing need will be used for assessing whether a five year supply of specific deliverable sites exists using the standard method set out in the PPG once the strategic policy is more than five years old.

2.3 The housing requirement for South Ribble is 417 dwellings per annum as set out in Policy 4 of the Central Lancashire Core Strategy. The Core Strategy is more than 5 years old. However, it is common ground that the housing requirement set out within Policy 4 was reviewed in 2017 when the Central Lancashire authorities commissioned the production of a Strategic Housing Market Assessment (SHMA) and then signed a Memorandum of Understanding (MOU) which agreed that the housing requirement figures should continue to be applied prior to or pending adoption of a replacement local plan¹.

2.4 In its statement of case, the Council now asserts that there has been a significant change in circumstances since the 2017 review through the introduction of the standard method to assess local housing need. The Council states that because the local housing need using the standard method of 191 dwellings per annum is significantly less than the adopted housing requirement of 417 dwellings per annum it renders Policy 4 of the Core Strategy out of date and supersedes the review of that policy which culminated in the 2017 MOU.

2.5 Whilst the review of Policy 4 took place before the July 2018 Framework was published and the standard method for calculating local housing need was introduced, footnote 37 of the Framework is clear that where the housing requirement has been reviewed and found not to require updating, it should continue to be used to measure the five year housing land supply. This part of footnote 37 was introduced in the July 2018 Framework without any transitional

¹ Please see paragraph 6.7 of the Council's Statement of Case

arrangements. Therefore, from the day the 2018 Framework was first published, even if the strategic policy was over five years old, as long as it had been reviewed and found not to require updating then the housing requirement within it should continue to be used for five year housing land supply purposes. There is no distinction in the Framework between reviews undertaken before or after the publication of the 2018 Framework. This is clear from the terms of the Framework (in both its 2018 and 2019 versions) and is confirmed in the PPG. Paragraph 68-005 of the PPG² is within the section entitled: "Housing supply and delivery". It states:

"Housing requirement figures identified in adopted strategic housing policies should be used for calculating the 5 year land supply figure where:

- *the plan was adopted in the last 5 years, or*
- *the strategic housing policies have been reviewed within the last 5 years and found not to need updating.*

2.6 Paragraph 68-005 was last updated on 22nd July 2019 and therefore would apply to any review which had been undertaken from July 2014 onwards i.e. including those reviews undertaken before the 2018 Framework was published. Indeed, the previous version of this paragraph contained within paragraph 3-030³ was published the same day as the PPG provided the standard method for calculating local housing need in September 2018. It contained similar wording to paragraph 68-005 and stated:

"Housing requirement figures identified in strategic policies should be used as the starting point for calculating the 5 year land supply figure:

for the first 5 years of the plan, and

where the strategic housing policies plans are more than 5 years old, but have been reviewed and are found not to need updating."

2.7 As the policy which contains the housing requirement for South Ribble has been reviewed and found not to need updating, national planning policy contained within footnote 37 of the Framework and supported by guidance contained within paragraph 68-005 of the PPG is clear that the five year housing land supply should be measured against it.

² Paragraph: 005 Reference ID: 68-005-20190722: "What housing requirement figure should authorities use when calculating their 5 year housing land supply?"

³ Paragraph: 030 Reference ID: 3-030-20180913: "How can an authority demonstrate a 5 year supply of deliverable housing sites?"

2.8 It is common ground that assessing the five year housing land supply against the adopted housing requirement means that the Council cannot demonstrate a deliverable five year housing land supply. Against the adopted housing requirement plus shortfall and a 5% buffer, the Council's supply figure of 2,546 dwellings equates to 3.8 years.

2.9 I have assessed the supply and conclude that 120 dwellings should be removed because the Council has not provided clear evidence for the inclusion of sites with outline planning permission for major development or allocated sites without planning permission as it is required to do so under the definition of "deliverable" as set out on page 66 of the Framework. I also conclude that the Council has not provided compelling evidence for the inclusion of a windfall allowance of 600 dwellings and conclude that a further 423 dwellings should be removed from the supply. This means that the deliverable supply at 1st April 2020 is 2,003 dwellings. Against the adopted housing requirement plus shortfall and a 5% buffer, this equates to 2.99 years as summarised in the following table:

Table 2.1 – South Ribble Borough Council's Five Year Housing Land Supply at 1st April 2020

	Requirement	
A	Annual requirement	417
B	Past shortfall at 1 st April 2020	1,108
C	Amount of past shortfall to be addressed in the five year period	1,108
D	Total five year requirement (A X 5 + C)	3,193
E	Requirement plus 5% buffer (D + 5%)	3,353
F	Annual requirement plus buffer (E / 5 years)	671
	Supply	
G	Five year supply 1 st April 2020 to 31 st March 2025	2,003
H	Years supply (G / F)	2.99

2.10 The implication of this is addressed by Mr Harris.

3. South Ribble, Preston and Lancashire City Deal

- 3.1 The South Ribble, Preston and Lancashire City Deal is referred to in Preston's Housing Land Position Statement (base date 31st March 2019)⁴ as one of the reasons why Preston decided to continue to measure its housing land supply against the adopted housing requirement even after the 2018 and 2019 Frameworks were published. It is discussed in paragraphs 1.19 to 1.21 on page 11 of the Preston Local Plan and in the foreword to the South Ribble Local Plan and is relevant in terms of the number of homes South Ribble has agreed with the Government that it is going to deliver. It is also discussed in the first and second MOUs.
- 3.2 The City Deal was signed in September 2013. It is an agreement between the Government and four local partners; Lancashire County Council, Lancashire Enterprise Partnership, Preston City Council and South Ribble Borough Council. A total of £434m new investment will lead to the expansion and improvement of the transport infrastructure in Preston and South Ribble at an unprecedented rate, enabling a forecast 20,000 new jobs and 17,420 new homes to be created over a 10 year period⁵.
- 3.3 Completions and commitments in the area would mean 12,613 dwellings would be delivered by 2025 i.e. a year after the term of the City Deal. The shortfall against the City Deal is therefore at least 4,787 dwellings. The commitment to deliver 17,400 homes by 1st April 2024 is clearly not going to be met unless additional housing sites come forward and are delivered.
- 3.4 In summary, the Council is committed to delivering many more new homes than even the adopted housing requirement set out in the Core Strategy requires. Within this context, it is surprising that South Ribble Council now considers that its five year housing land supply should be measured against a figure of just 191 homes per year.

⁴ Core Document **1.23**

⁵ Core Document **1.17**

4. Affordable housing supply

- 4.1 Affordable housing completions have been below the net need identified in the SHMA and more recent Central Lancashire Housing Study.
- 4.2 The Council's claimed deliverable supply over the five year period is 2,546 dwellings. Of these, only 264 (10%) are affordable as I set out in appendix **BP11**. Therefore, the affordable housing need identified in the SHMA and the Central Lancashire Housing Study will not be met by the existing housing land supply.

5. Conclusions

- 5.1 My main proof of evidence concludes that the five year housing land supply should be measured against the adopted housing requirement set out in policy 4, plus backlog and a 5% buffer. This means that the Council cannot demonstrate a deliverable five year housing land supply. I have assessed the supply and conclude that against the adopted housing requirement plus shortfall and a 5% buffer, the supply equates to 2.99 years. The implications of this are addressed by Mr Harris.
- 5.2 I also conclude that the Council will not deliver the number of homes it has agreed it will deliver with the Government through the City Deal without additional housing sites. Finally I conclude that the Council's deliverable housing land supply will not meet the identified affordable housing need. The implications of this are also addressed by Mr Harris.