

WYRE FOREST LOCAL PLAN, APPENDICES Matter 2

Campaign to Protect Rural England (Worcestershire Branch)

November 2020

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APPENDIX 2.1

Standard Methodology Diagrams

Housing Calculation Tables (Standard and new Standard Methodology, ONS 2014-2018, 2019 Affordability)

1. Annual Housing Need 2020-2030
2. Annual Housing Need Affordability Add On 2020-2030
3. Housing Need Affordability % Add On 2020-2030

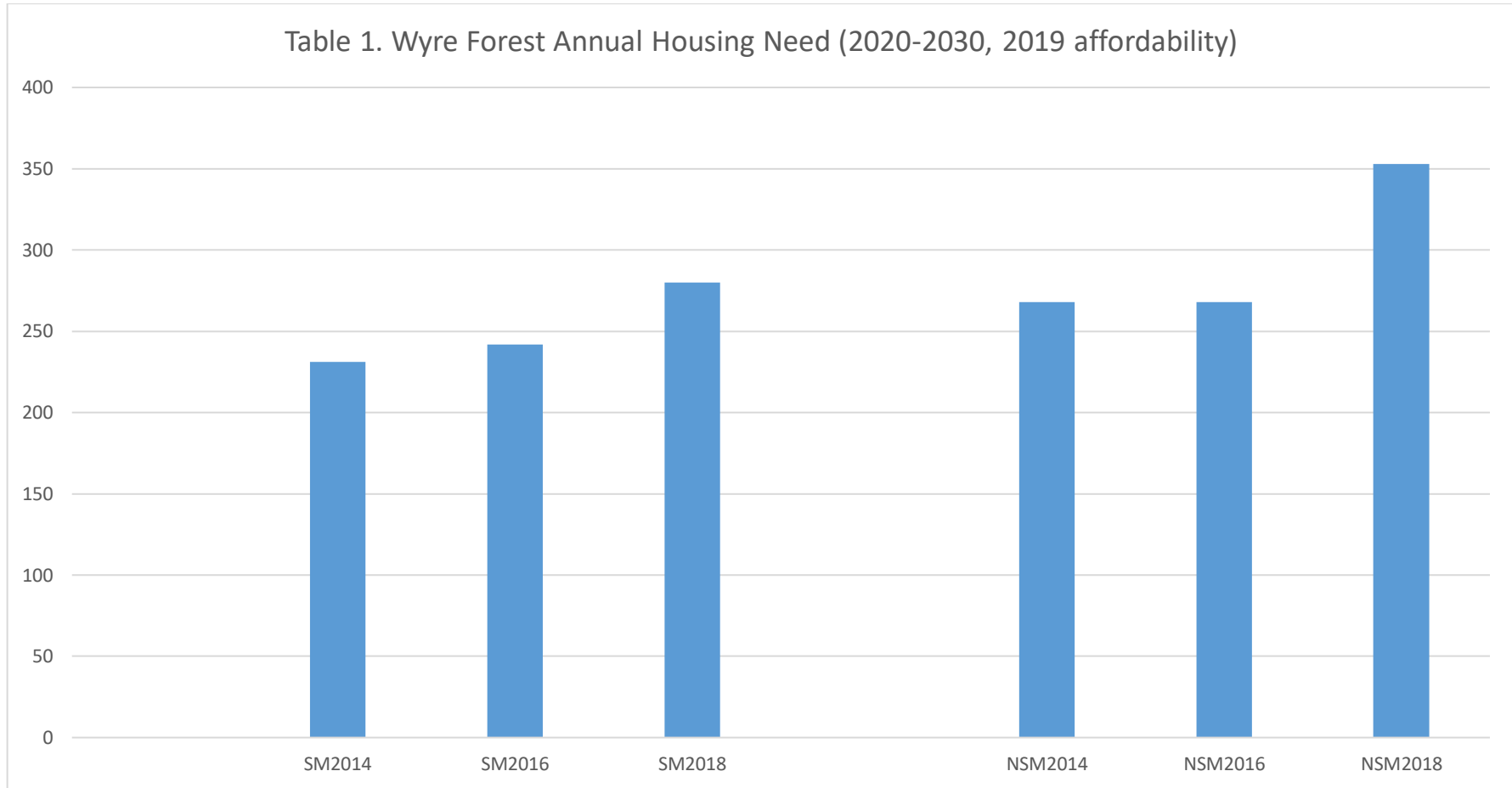
4. Annual Housing Need 2020-2036
5. Annual Housing Need Affordability Add On 2020-2036
6. Housing Need Affordability % Add On 2020-2036

7. Comparison of SM2014-2018 with Black Country, Birmingham and the West Midlands Combined Authority

8. NSM2018 Affordability adjusted start date 2010-2018*
9. NSM2018 Affordability % adjusted start date 2010-2018

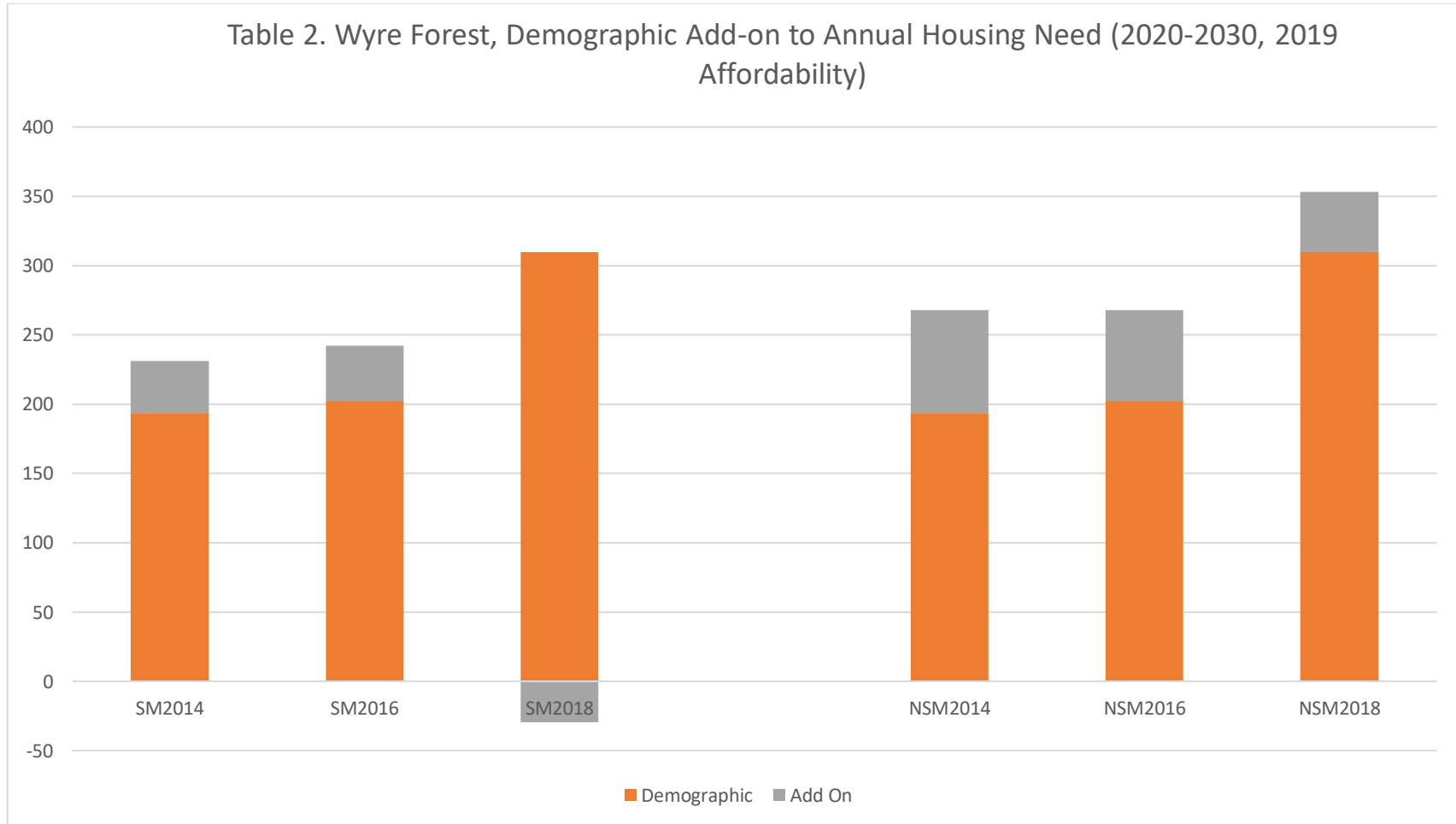
*This is a theoretical exercise where I adjust the start date of the NSM to change the affordability calculation. In reality the end date would also change which could cause either more or less volatility. Wyre Forest shows some volatility, although some local authorities have greater swings.

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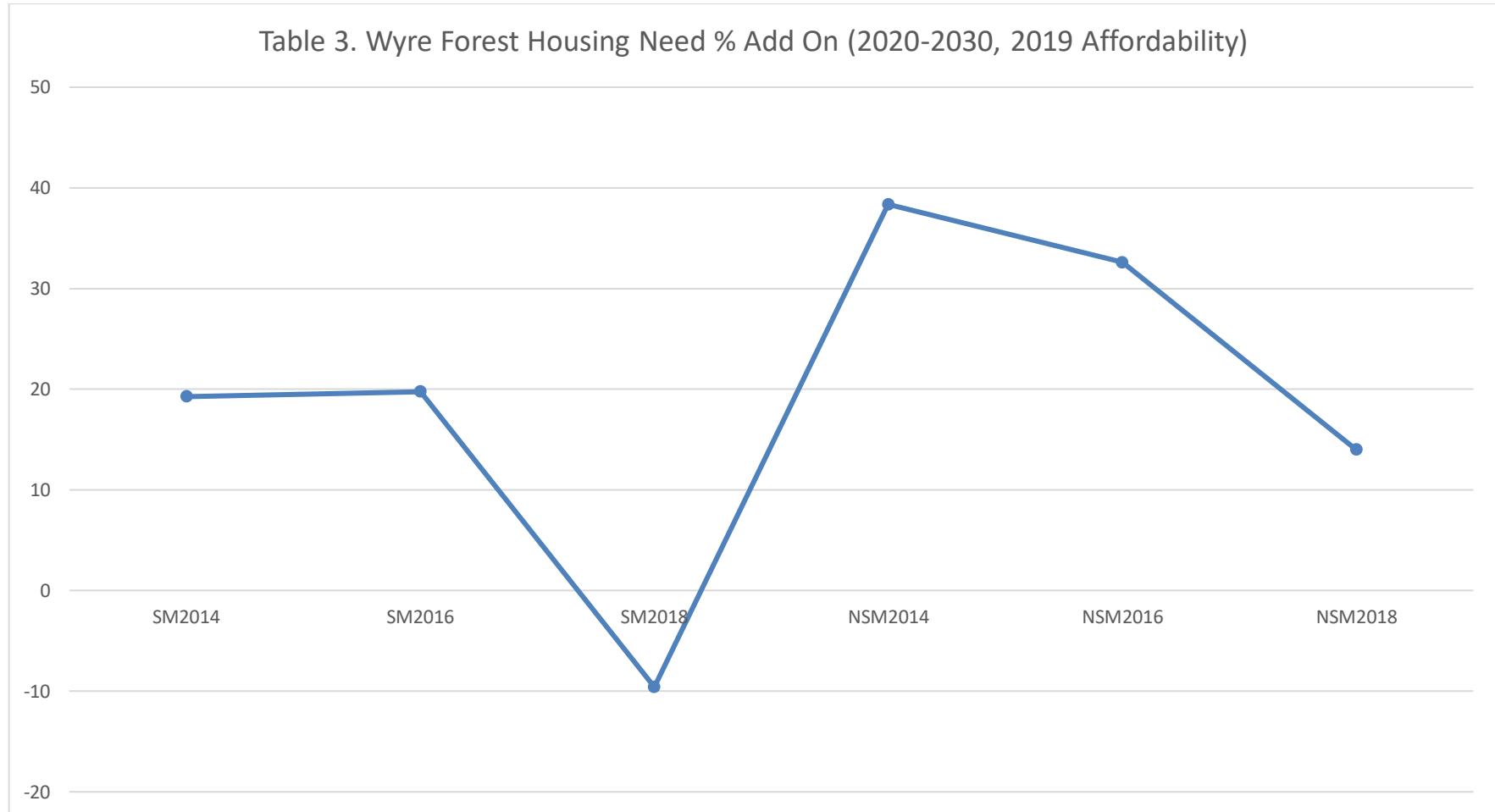
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Table 2. Wyre Forest, Demographic Add-on to Annual Housing Need (2020-2030, 2019 Affordability)

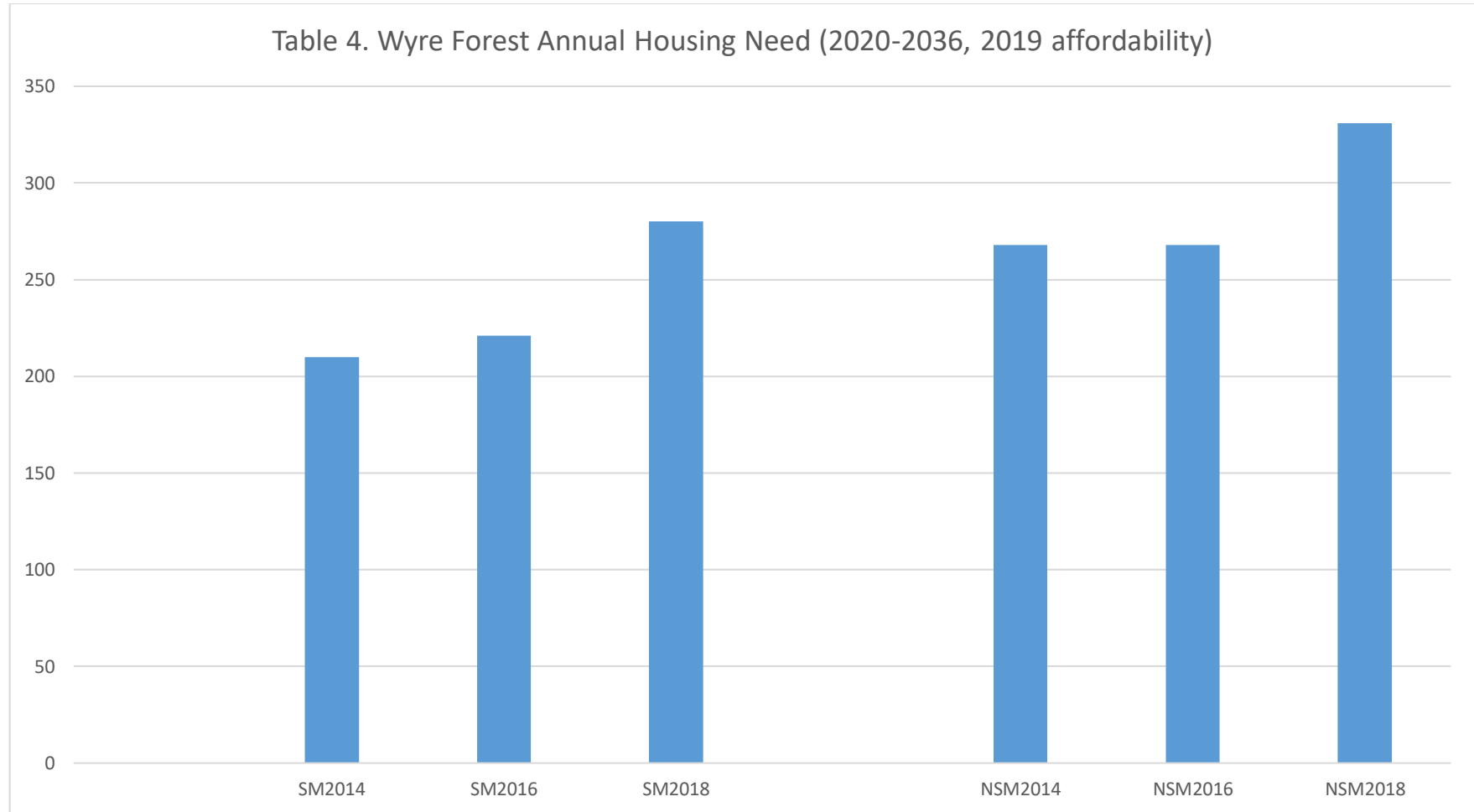


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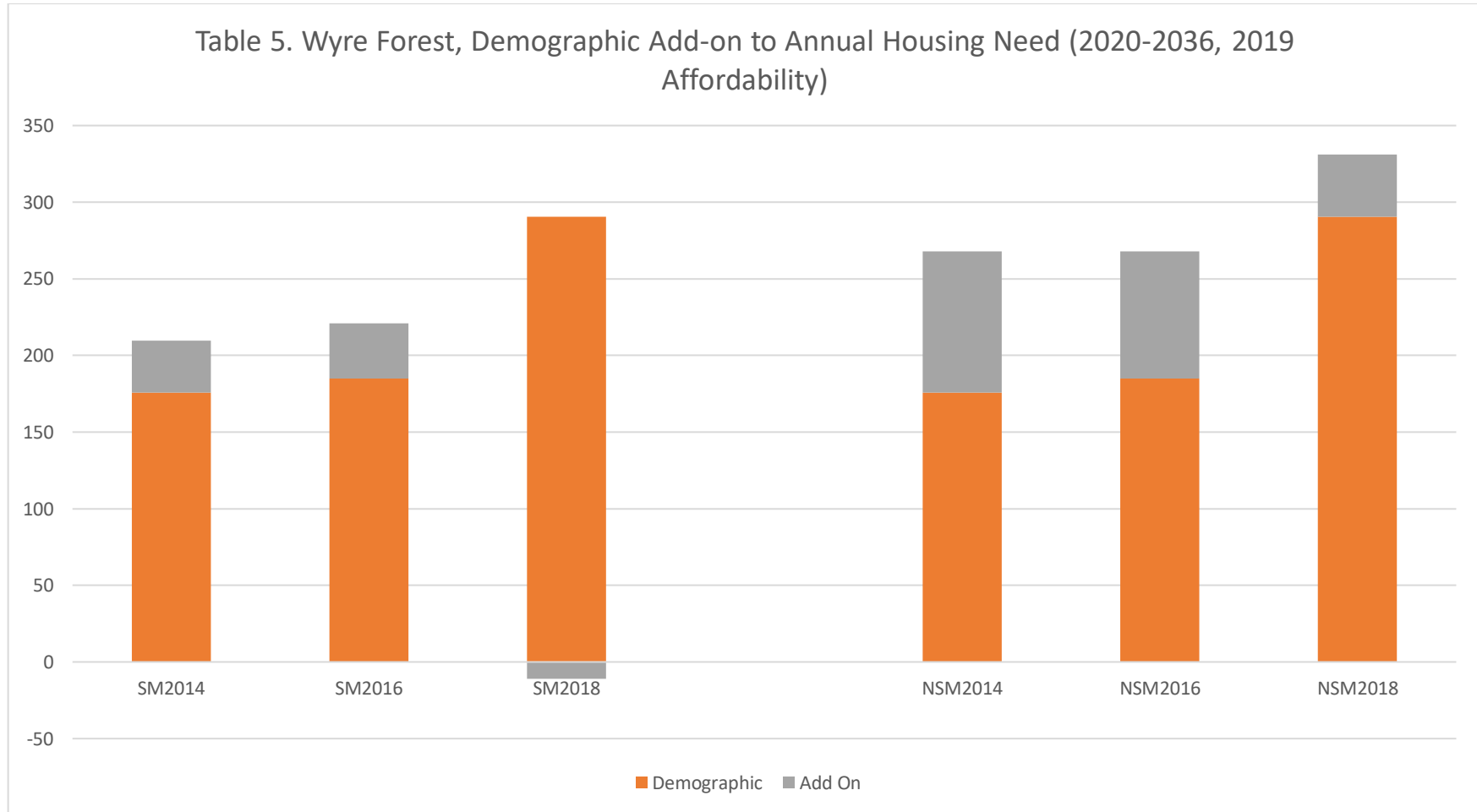
Table 3. Wyre Forest Housing Need % Add On (2020-2030, 2019 Affordability)



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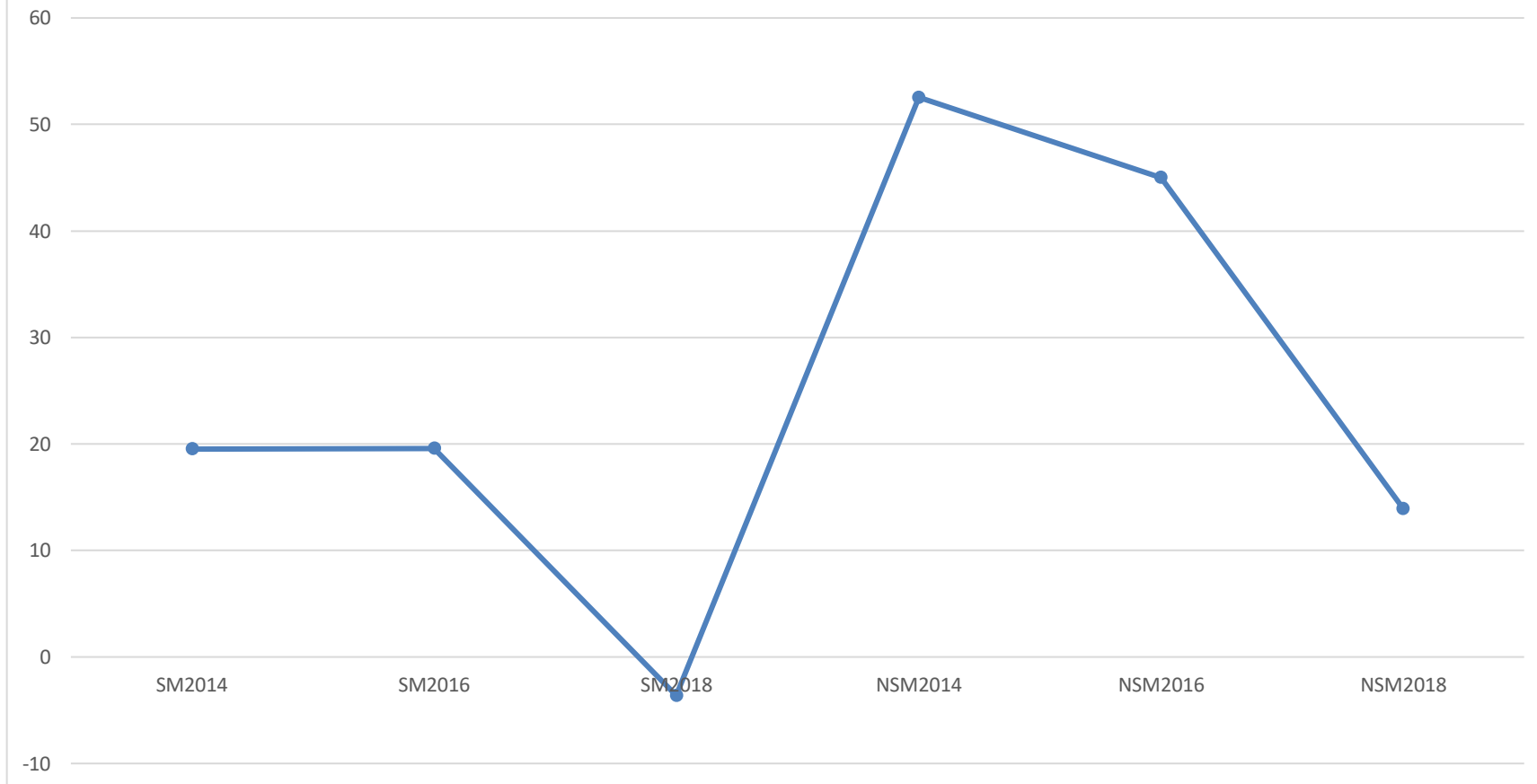


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Table 5. Wyre Forest Housing Need % Add On (2020-2036, 2019 Affordability)



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Table 7. Annual Housing Need, Standard Methodology, (2020-2030), 2019 Affordability

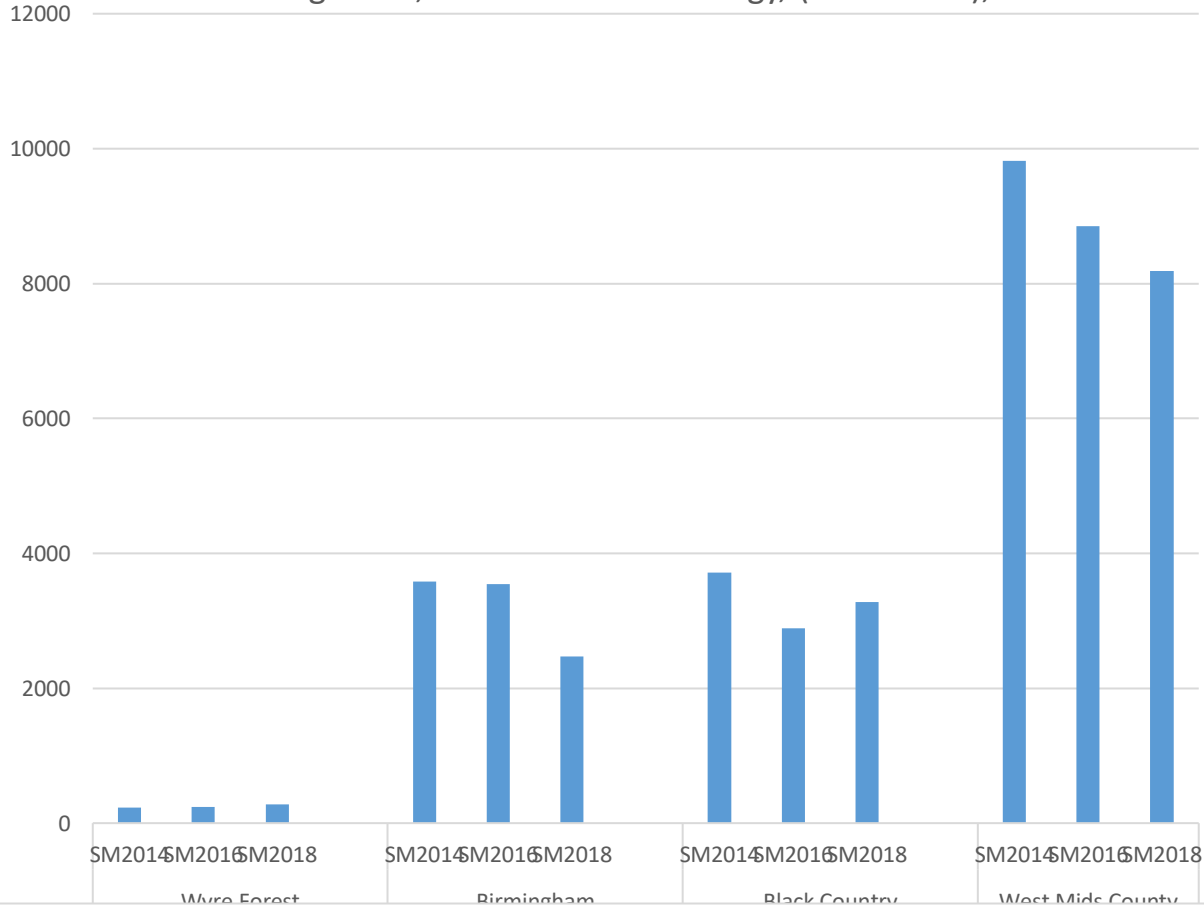


Table 8. Impact of Changing Affordability Start Date on Wyre Forest NSM (ONS2018) Annual Housing Requirement (2020-2030, Affordability end date 2019)

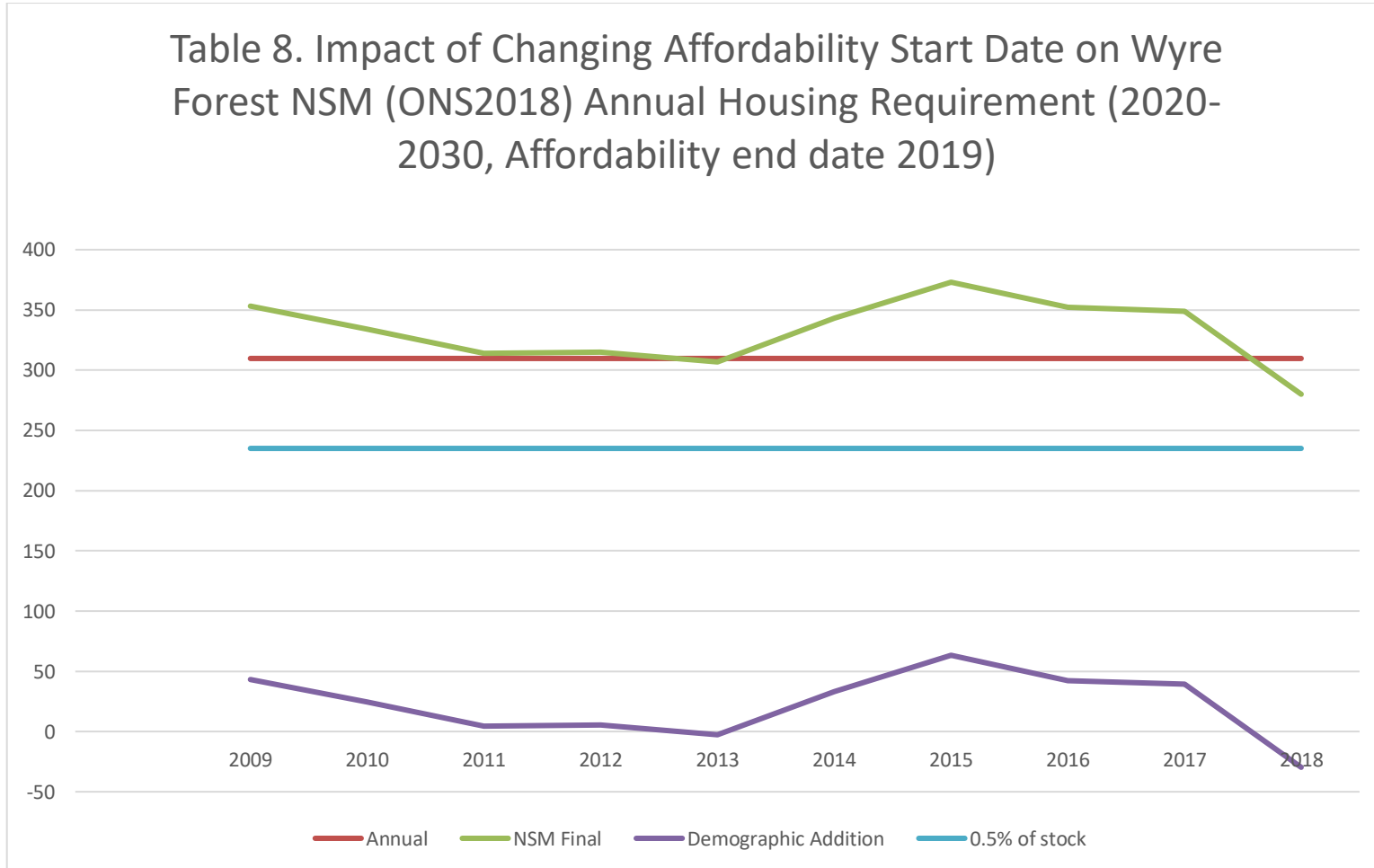
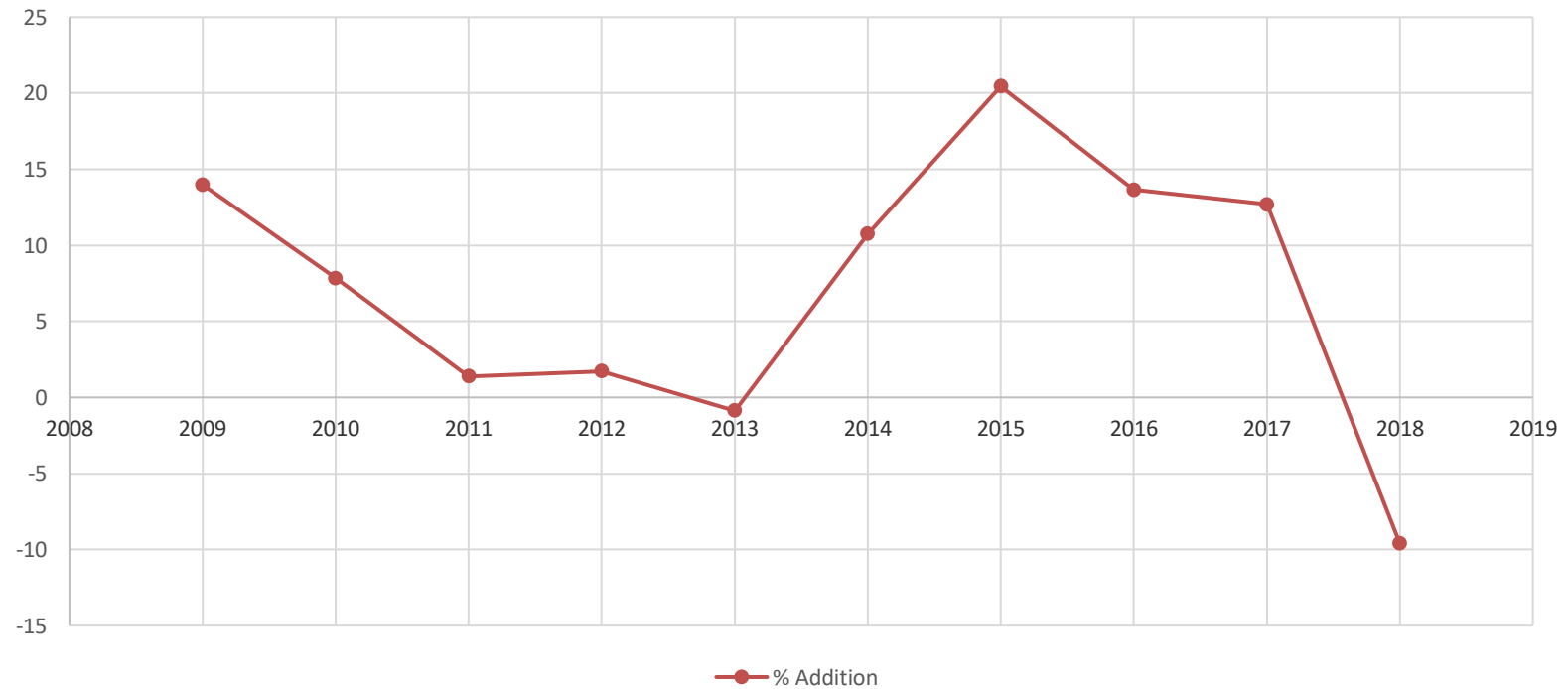


Table 9. % Addition to Housing Requirement in Wyre Forest NSM (2018 ONS) using different affordability start dates (2020-2030, 2019 Affordability end)



APPENDIX 2.2

ABCA letter to West Midlands CPRE (22.7.20)



Association of Black Country Authorities
Dudley, Sandwell, Walsall and Wolverhampton

Our Ref: HP/CW Date:
22 July 2020
Please ask for: Christine Williams Direct
Line: 01922 652089

Mary B L Booth, Chaiman, CPRE
Staffordshire Peter King, Vice-Chair, CPRE
West Midlands c/o CPRE Staffordshire

Staffordshire Place 2
Stafford ST16 2DH

By email : CPRE@staffordshire.gov.uk

Dear Ms Booth and Mr King

We write to you as the Association of Black Country Authorities (ABCA) in response to your email dated 22 June 2020 regarding the Black Country Plan review process. Set out below is a response to the 4 questions raised in your email which we hope you will find useful.

- 1) Using the 2016 ONS household projections, (instead of the out of date 2014 figures) would give a more realistic level of housing need, reducing the figures by 17,081.

Response: The National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG) are clear that the national standard method must be used to calculate the minimum local housing need figure. The 2014-based household projections are used within the standard method to provide stability for planning authorities and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes. Therefore, it is not within the power of the Black Country authorities to use 2016-based household projections at this time. The standard method is due to be revised by the Government within the next few months.

- 2) Continuing with the 2036 end date for the plan would reduce the deficit in housing by 7,522 homes.

Response: The NPPF and NPPG require a Local Plan which is addressing strategic issues such as housing land supply to cover a period of at least 15 years from adoption. National policy (NPPF and NPPG) identifies that strategic policies set out within the local plan should look ahead over a minimum 15 year period from adoption so that they are able to anticipate and respond to long term requirements and opportunities, such as those which may arise from major improvements in infrastructure. Under the updated current Black Country Plan timetable the Plan would be formally adopted in 2024 and so the 15 year time period would extend to 2039.

- 3) Reviewing the housing supply evidence, principally to include an allowance for larger windfall sites, more houses in centres and moderate increases in housing density could reduce the deficit by between 5,000 and 10,000 homes.

CPRE 260520/Wyre Forest/Appendices Matter 2

Response: The Black Country Urban Capacity Review 2019 (UCR) addresses in some detail the potential housing capacity which could arise from windfall sites, increases in housing density, and sites within centres. This evidence is under review and will be updated on a regular basis as housing monitoring information is updated and the Black Country Plan process progresses. However, current evidence suggests that such sources of supply are unlikely to yield significant amounts of housing capacity over the Plan period, beyond that already accounted for in the UCR.

- 4) Undertaking a joint review of potential strategic employment land with adjoining authorities, including Shropshire and South Staffordshire, to avoid double-counting need, especially for large sites.

Response: The Black Country authorities are already working closely with neighbouring local authorities, including Shropshire and South Staffordshire, to ensure that there is no double counting of both land supply and need through our Economic Development and Needs Assessment (EDNA) and the Duty to Cooperate.

We hope that the above information clarifies the current position for you. However if you wish to discuss the matter further, the Black Country Planning Lead Officers will be happy to arrange a virtual meeting with you. Please contact Ian Culley, Lead Planning Manager (Regional Strategy) Ian.Culley@wolverhampton.gov.uk

Yours sincerely

Councillor Patrick
Harley Leader
Dudley Metropolitan Borough Council

Councillor Mike
Bird Leader
Walsall Metropolitan Borough Council

Councillor Maria Crompton Deputy Leader
Sandwell Metropolitan Borough Council

Councillor Ian Brookfield Leader
City of Wolverhampton Council

APPENDIX 2.3

Impact of different migration trend lengths, ONS, March 2020 (Extract)

Article

Impact of different migration trend lengths: March 2020

Considering the impact of different migration trend lengths in the 2018-based subnational population projections for England.

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+44 (0)1329 444461

Release date:
24 March 2020

Next release:
To be announced

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2. [Approaches for our 2018-based projections](#)
3. [The results: impact of the different migration trend lengths](#)

1 . Introduction

The purpose of population projections is to provide indications of likely local growth or decline if recent trends continue. Variant projections may also be produced, where alternative trends are considered.

However, what constitutes “recent trends” is not straightforward. There is no definitive definition of how many years of source data are needed to determine a recent trend. A further challenge is that even if a certain definition is preferred, there may not be a consistent series of data available for that length of time.

An area of particular discussion is how many years of data should be used to inform projections of migration at local level. To address these challenges, for the 2018-based subnational population projections we have published variant projections using alternative lengths of migration trend. This article explains these variants and their differing results, and considers the pros and cons of each.

2 . Approaches for our 2018-based projections

Principal projection

We refer to our main projection as our principal projection.

Our usual approach for subnational population projections is to use five years of trend data. What this means is that when we calculate the numbers of births, deaths or migrants at local level, our starting point is the average of what has happened over the past five years. The logic is that five years may be more representative of local patterns than a single, possibly atypical, year of data.

However, for our 2018-based principal projection, we used just two years of trend data for internal (within England) migration. This was because the new improved method for estimating internal migration within England was introduced to the Office for National Statistics’s (ONS’s) population estimates in the year ending mid-2017, such that by the starting point of the projections in mid-2018 there were only two years of data available using this new method.

This gave us a choice of whether to base our internal migration calculations on either:

- two years of data solely using the new method, which better accounts for moves of graduates after they finish their studies and uses a replacement data source to account for those who moved more than once, or were born, died, immigrated or emigrated during the year
- five years of data: two using the new method, and three using the old method

For some areas the estimates of internal migration changed substantially once the new method was introduced, so our preference was to base our projected internal migration entirely on this new method.

This decision was a trade-off: the new method should offer a better projection of reality and is also consistent with the approach currently used in the population estimates. However, for the purpose of the projections this may be either enhanced or offset by how reflective two years of data (rather than five) are of that reality. There is no right answer to this: in some areas the new method will be more accurate than in others, and everywhere will differ in terms of how typical internal migration levels over the past two years have been.

APPENDIX 2.4

Three Extracts from Hansard (8 Oct 2020/16 Nov 2020)

Planning and House Building Next

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08 October 2020

Volume 681

Extract 1

The Minister for Housing (Christopher Pincher)

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I am grateful for the contributions of all 39 right hon. and hon. Members who have spoken today, and I do not for a minute underestimate the insight and the wisdom that I have heard, not least that of my hon. Friend the Member for Hazel Grove (Mr Wragg) in his very kind but entirely unsolicited testimonial during his remarks.

I hope that we will not lose sight of where we have come from, because this Government have delivered more than one and a half million new homes since 2010. We have built more than 241,000 in England in the past year alone. This year, we will announce a £12.3 billion package of affordable homes, which will see more than 50% of them delivered at discounted rent. We will take no lectures from representatives of the Opposition: we built more council homes in one year than they built in the entire 13 years. In Wales, they managed to build just 12 council homes last year—not even enough homes for a Welsh rugby team.

We can be rightly proud of our success, particularly as it has been achieved despite a slow and outdated planning process. We are determined to deliver on our manifesto commitment and deliver 300,000 new homes each year by the mid-2020s in the areas that really need them to meet that most fundamental Conservative value to own our own home and to have a stake in the country and the future of it. We want more people, especially younger people, to realise that aspiration. We also want to enhance our environment, protecting our green belt, increasing biodiversity and safeguarding our precious green spaces.

Extract 2

Christopher Pincher

I can give my right hon. Friend that absolute assurance.

On the question of the near-term local housing need calculation, it might be helpful if I explain the background to our proposals to revisit it. In 2018, we introduced a standard method for calculating local housing need that was designed to give communities the transparency they deserve by showing the minimum number of homes that areas need, but it is clear that the current formula for local housing need is inconsistent with our manifesto aim to deliver 300,000 homes a year by the mid-2020s. Existing adopted local plans provide for only 187,000 homes per year across England. This is not just significantly below our ambition but lower than the number of the homes we delivered last year. It is also lower than the estimate of groups as diverse as KPMG and Shelter who say that we need to deliver homes for sale or for rent north of 250,000 per year to meet our need.

To address that in the short term, we committed to reviewing the standard method at this year's Budget. The consultation is now closed, but I can assure the House that over the past two months my Department has actively engaged with the sector and is listening to feedback. Many right hon. and hon. Members will know that I too have been listening and discussing carefully. I am especially mindful that Members are concerned about geographic imbalance—having too many homes in the south and not enough in the midlands and the north. Equally, I recognise anxieties about what these changes might mean for our countryside in contrast to our urban areas. I therefore want to reassure the House that through this consultation process we are committed to addressing any supposed imbalances. I recognise that our future is not just about what we build but where we build it. The standard method has focused on affordability. That is natural, because our concern is that there are areas that are least affordable, and it cannot be right that where historically supply has not kept up with demand, people are prevented from living where they most want or need to live. But we must also consider other factors. The House has considered, and we will consider, such factors as stock renewal, so we level up those areas of our country—not just the midlands and the north; there are areas of East Anglia, too—that suffer from poor-quality housing and infrastructure; and brownfield regeneration, so we improve home-building opportunities in our towns and cities on urban land for too long derelict or unloved.

Our changes to the standard method in the short term will be just a starting point. We know that the housing numbers generated by the standard method will not necessarily be the numbers that areas plan for, because of the physical and geographic constraints placed on them, as my right hon. Friends the Members for Epsom and Ewell (Chris Grayling) and for East Hampshire (Damian Hinds), my hon. Friends the Members for Colne Valley (Jason McCartney) and for Leigh (James Grundy) and many others mentioned. Land availability or local constraints might mean that there is a need for neighbouring

areas to meet demand more appropriately. We look forward to giving our detailed response to the consultation following a careful analysis of all responses. Until such time, all the figures that are bandied about in the media, some of which were quoted in the House today, are entirely speculative.

Our White Paper “Planning for the Future” represents our long-term aspirations to reform our planning system to make it fit for the future. Anyone who knows our planning system knows it to be opaque, slow and almost uniquely discouraging for all but its most expert navigators. Currently, it takes on average seven years to complete a plan and a further five years for associated permissions to be granted. Our planning White Paper proposes a modern, digitalised and map-based system, with up-front strategic controls, leaving local planning authorities and, crucially, local communities much more empowered to design the neighbourhoods that they want, that look the way they want, and that have the infrastructure they need.

The House will be concerned to hear that only around 3% of local people respond to planning applications. In local plan consultations, engagement can fall to less than 1% of the local community. That is simply not acceptable in a modern democracy, and we will change the system to increase local involvement. Our planning White Paper proposes a simpler, clearer process for planning design.

Oral Answers to Questions

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16 November 2020

Volume 684

Extract 3

[Jerome Mayhew](#)

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Given that the likely response to covid will mean that office space is needed much less in the future, and that that is likely to be a long-term trend, does my right hon. Friend agree that that should have a profound impact on the algorithmic distribution of housing numbers anticipated by the planning White Paper?

[Robert Jenrick](#)

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My hon. Friend makes an important point. We are seeing the most substantial change to our city centres and town centres since the second world war, and that does give us pause for reflection. We now need to consider what the opportunities will be for the repurposing of offices as residential and for turning retail into mixed use, and that will, I think, lead us to a different approach to distributing housing numbers across the country. The consultation that he refers to has closed; we are considering the responses, and I will make a statement on that in the weeks ahead.