

Matter 3 – Housing need and requirement

Issue - Is the identified housing requirement range in Policy WSP 5, comprising a base figure set using the standard methodology and a top range of 26,000 dwellings between 2017/18 and 2035/36 (1,400 per year) justified and consistent with national policy?

[Policy WSP 5 Scale and distribution of additional housing]

Questions

a) *Is the Plan period 2017/18 to 2035/36 justified and consistent with national policy which requires strategic policies to look at least 15 years ahead from adoption?*

1. It is noted that the Plan period runs from 2017/18 until 2035/36. The NPPF¹ looks for strategic policies in Plans to look ahead over a 15-year period from adoption. As the Plan is only starting the examination process during 2021, the Plan will not cover a 15-year Plan period on adoption. Therefore, the HBF considers that it may be beneficial to take a cautious approach and to extend the Plan period.

b) *Is the absence of a base range figure in Policy WSP 5 justified in the context of paragraphs 61 and 66 in the NPPF? What should the minimum annual figure and overall total be? [The Council is requested to supply detailed workings in its response].*

2. Policy WSP5 states that the housing requirement is a range using the standard method as the base of the range and a figure of 1,400 homes a year will provide the top of the range. The HBF does not consider it is appropriate to use a range and does not consider it is appropriate to include a base rate that is subject to change.
3. The HBF considers that this use of a range and the lack of a confirmed base rate has the potential to cause confusion and to make the policy difficult for people to understand or use effectively. The HBF does not consider that the policy is clearly written and unambiguous as required by the NPPF². The HBF considers that a range is not appropriate, it suggests that the top figure would be a maximum and could limit development of homes. The HBF does not consider that this is in line with national policy which looks to support the Government's objective of significantly boosting the supply of homes or in line with paragraph 61 of the NPPF which states that *'to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals'*.
4. The HBF has considered the local housing need (LHN) using the Standard Methodology set out in PPG and has calculated the LHN as 955dpa. It should be noted that the Standard Method identifies a minimum annual housing need figure, it does not produce a housing requirement figure. It should also be noted that the Government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The Standard Method provides a minimum starting point, and there may be circumstances where it is appropriate to consider whether the actual housing need is

¹ Paragraph 22

² Paragraph 16

Home Builders Federation (HBF) response to the
Wakefield Local Plan Examination
Matters, Issues and Questions

higher than the Standard Method indicates. PPG (ID: 2a-010) goes on to state that these circumstances can include growth strategies for the area; strategic infrastructure improvements; previous levels of delivery; or where previous assessments of need are significantly greater than the outcome from the Standard Method.

c) *Is the proposed uplift above Local Housing Need (LHN), to a figure of 1,400 dwellings per annum (dpa), justified by the Council's evidence? How was the figure selected? What jobs growth forecasts or other evidence was used?*

5. The Housing Technical Paper (October 2020) considers these circumstances and clearly identifies that there are growth strategies for the area including the Wakefield District Economic Strategy, which seeks to maintain current high levels of housebuilding and sets a vision for a quality and mixed housing offer in the district. The Leeds City Region Strategic Economic Plan which sets housing growth a key priority for achieving inclusive growth and identifies the City Fields urban extension and the Aire River Growth corridor as housing growth areas. The Paper also states that the Council is pursuing various funding streams for housing growth in the district.
6. The Housing Technical Paper goes on to identify the strategic infrastructure improvements which the Council is seeking to provide to ensure housing growth is appropriately supported. These include the South Featherstone Link Road, the Knottingley Relief Road, Castleford Growth Corridor Scheme, Leeds City Region Inclusive Growth Corridors and HS2.
7. The Housing Technical Paper also identifies the annual net housing completions between 2012/13 to 2019/20 it identifies an average delivery of 1,541.5dpa, with a peak of 2,112 in 2018/19.
8. The 2019 Strategic Housing Market Assessment (SHMA) states that the 977 dpa, identified as the LHN from the standard method, is too low, and goes on to state that the SHMA therefore supports a housing target of around 1,400 each year.

d) *Does the uplift figure align with planned employment growth over the Plan period? If not, what is the Council's justification for this?*

9. The Local Plan allocates 617 hectares of developable land for employment use. The Wakefield Employment Land Needs Assessment (2020) identifies that the area has seen substantial, above trend growth on key measures of economic performance in recent years. Economic output (GVA) has increased by an average of 3.5% per year in the post-recession period since 2009, compared to 3.3% nationally. It goes on to suggest that Wakefield's economy is likely to grow by an extra 9,600 FTE jobs, this would increase the number of FTEs in the district from 139,500 in 2017, to 149,100 by 2036. The Assessment suggests that this equates to a range of between 96 and 126 hectares of employment land. The HBF considers that it is essential that housing growth aligns with the strategy for economic growth, otherwise it risks stifling growth and creating unsustainable travel patterns.

e) *The Plan makes provision for 1,400 dpa and the Council has indicated that an uplift above LHN is justified. In this context is a range necessary?*

Home Builders Federation (HBF) response to the
Wakefield Local Plan Examination
Matters, Issues and Questions

10. The HBF does not consider that the LHN produced from the Standard Method would provide an appropriate housing requirement, it is evident that the actual housing requirement should be higher. The HBF does not consider that it would be appropriate to limit the housing requirement at the top end of the requirement either, and does not consider that this would be consistent with the NPPF requirement to support the Government's objective to boost the supply of homes. The HBF considers that the clarity of this policy could be improved, and recommend that the range is removed, and that the housing requirement is clearly set out as one net minimum figure. Based on the PPG guidance on the circumstances where it is appropriate to consider whether the actual housing need is higher than the Standard Method indicates, the HBF would suggest that there is clear evidence that the LHN in Wakefield is clearly significantly above the minimum figure provided by the standard method, and is also likely to be above the top end of the range proposed by the Council at 1,400dpa.

f) *Should there be a housing requirement for designated neighbourhood areas in Policy WSP 5? (paragraph 67 in the NPPF) If so, what should this be?*

11. The HBF considers that the Council should provide a requirement in line with the NPPF³ which states that within the overall housing requirement strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development.

³ Paragraph 66