

## **Matter 7 – Other housing needs**

*Issue - Does the Plan set out positively prepared policies to meet affordable housing needs and the housing needs of other groups, which are justified, effective and consistent with national policy?*

*[Policy WSP 5 section 3 Scale and distribution of additional housing]*

*[Policy WSP 6 Housing mix, affordability and quality]*

*[Policy WSP 7 Specialist housing]*

*[Policy WSP 24 Build to rent housing]*

*[Policy WLP 2 Accessible housing standards]*

*[Policy WLP 3 Minimum space standards for homes]*

*[Policy WLP 4 Sub-division and multiple occupation of homes]*

### **Questions**

#### **Affordable housing**

a) *How much affordable housing will be delivered over the Plan period, taking account of all potential sources of supply (including allocations and extant permissions)? Will supply meet identified needs?*

1. The HBF considers it is for the Council to identify the level of affordable homes that are expected to be delivered over the Plan period and to ensure that it meets the identified need. The 2019 SHMA identifies an annual net imbalance of 3,090 affordable homes.

b) *Are the affordable housing percentage requirements in part b of Policy WSP 6 justified by the Council's viability evidence? Do the housing viability Value Areas differ to those identified in the Community Infrastructure Levy (CIL) Charging Schedule, and if so, why? Is the requirement to secure a 'minimum' percentage of affordable homes justified?*

2. The 2019 Residential Viability Report has tested the affordable housing policy, it highlights that viability varies significantly across the district. It has tested affordable housing requirements from 30% down to 10% to determine which is the most appropriate requirement in each area. It considers that it is safest to utilise the requirements as now set out in the policy, with area 1 requiring 30%, area 2 requiring 20%, area 3 – 10% and area 4 – 0%.
3. The HBF considers that the requirement to 'maximise the provision of affordable housing and provide at least a minimum percentage of affordable housing' is not sound and is not effective. The wording of the policy creates uncertainty and ambiguity around what percentage of affordable housing the Council may actually require to be provided. The HBF considers that the Council should delete this requirement from the policy.

c) *Are the housing viability Value Areas shown on the Policies Map, as indicated in Policy WSP 6?*

4. The HBF is not aware of the Value Areas being shown on the Policies Map as indicated in Policy WSP6.

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

d) *Why does Policy WSP 6 propose that affordable housing will be sought from schemes of 15+ units? Is the Council's approach consistent with paragraph 65 in the NPPF which states that affordable housing should be sought from major schemes?*

5. The HBF considers it is for the Council to evidence the 15 unit threshold for the affordable housing requirement.

e) *Is the requirement for at least 10% of the affordable housing provision to be provided as affordable home ownership justified by the Council's evidence on local needs?*

6. The HBF considers the requirement for at least 10% of the affordable housing provision to be provided as affordable home ownership is not in line with the NPPF<sup>1</sup>, which states that where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership. The HBF considers that this means that Policy WSP 6 should be amended to as follows *'for all proposals where affordable housing is required at least 10% of the required affordable housing provision should be provided as affordable home ownership tenures'*, this would bring the policy in line with the NPPF. Unless the Council can evidence that this would significantly prejudice the ability to meet the identified affordable housing need.

f) *Notwithstanding that transitional arrangements apply, are there any implications for the Wakefield Plan arising from the Government's Written Ministerial Statement on First Homes? Is there a need to undertake an early review of the Plan?*

7. The PPG<sup>2</sup> states that the Plan is not required to reflect the First Homes policy requirement. However, the HBF considers that it would be beneficial if the Council were to consider the inclusion of First Homes and potentially seek to include an early review of policy to allow for this to be considered as part of the affordable housing provision.

### **Other housing needs**

g) *Are the standard density rates in Policy WSP 5 justified and consistent with paragraph 125 in the NPPF?*

8. The NPPF<sup>3</sup> looks for plans to contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible, it considers that these should include the use of minimum density standards for town centres and other locations that are well served by public transport. Policy WSP5 proposes a density of at least 50dph in Wakefield city centre; Castleford and Pontefract town centres; and within 500m of a rail and bus station public transport hubs; at least 40dph throughout the rest of Wakefield, Castleford and Pontefract; at least 30dph in other urban areas, local service centres, villages and the Green Belt. The policy does state that in circumstances where individual site characteristics dictate and are justified, a lower density may be acceptable.

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<sup>1</sup> Paragraph 65

<sup>2</sup> ID:70-018-20210524

<sup>3</sup> Paragraph 125

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

9. The flexibility provided by this policy in relation to individual site characteristics is noted, however, the HBF would recommend further amendments could be made to create greater flexibility to allow developers to take account of the evidence in relation to demand, market aspirations and viability. The Council will also need to consider its approach to density in relation to other policies in the plan. Policies such as open space provision, space standards and parking provision will all impact upon the density which can delivered upon site.

*h) Do the access requirements in Policy WSP 7 allow sufficient flexibility for specialist housing to come forward in areas of need?*

10. The HBF considers that it is important that Policy WSP7 is flexible enough to allow for specialist housing to come forward to meet local needs. The HBF considers that rather than restricting developments to accessible locations it could refer to locations that could be made accessible or sustainable.

*i) Is the Use Class definition of C2 and C3 in Policy WSP 7 consistent with case law and the legislative framework? If not, what modifications should be made to the text?*

11. This policy states that *'with regard to market accommodation for older people, retirement living or sheltered housing and extra care housing or housing with care is considered as being in use class C3 and relevant housing policies in the Local Plan will be applied to such proposals'*.

12. Use Classes are as defined by the Town and Country Planning (Use Classes) Order, it is therefore not appropriate for the Council to try to determine what will be considered as C3, or not, within a policy. Currently, Use Class C2 is defined as a use for the provision of residential accommodation and care to people in need of care (other than a use within class C3 dwelling houses). Whilst Class C3 is defined as a dwelling house used by a single person or by people to be regarded as forming a single household or not more than six residents living together as a single household where care is provided for residents or not more than six residents living together as a single household where no care is provided to residents.

13. The HBF considers that older people sheltered and extra care accommodation can fall within either use class dependent on the facilities, Use Class C3 (low range) or C2 (higher range), and a judgement will need to be made in each case. The HBF recommends that the policy is modified to simply state that *'where specialist accommodation is within use class C3 then relevant housing policies will be applied to such proposals, and where specialist accommodation is in use class C2 then relevant policies will not be applied to such proposals'*.

*j) Are the detailed criteria and requirements in Policy WSP 24 necessary to include in the Plan, in order to secure appropriate build for rent schemes?*

14. The HBF does not wish to comment in relation to this question at this time.

*k) Does the Strategic Housing Market Assessment 2019 provide sufficient evidence of local need for the accessibility standards in Policy WLP 2, in line with guidance in the PPG? If not, what additional information is required?*

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

15. This policy requires new build residential developments over 0.5ha or 10 or more homes should include 9% of homes at M4(2) standard and 3% of homes at M4(3) standard. It also states that on smaller sites, where percentages would deliver less than one homes, one home should be provided to meet the relevant building regulation.
16. The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG.
17. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for Wakefield which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy.
18. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommend that an appropriate transition period is included within the policy. The 2019 SHMA has reappraised the Supported and Specialist Housing Need Report 2018 and provides some limited information in relation to the need for accessible and adaptable properties, utilising national data and the 2015 Household Survey, however, the HBF does not consider this work is sufficiently detailed to support the introduction of these optional standards.
19. The SHMA document does not set out precisely what proportions it considers should be provided in each tenure, it also does not appear to provide any evidence in relation to the size, location, type and quality of dwellings needed based on future demand. The HBF do not consider that this limited amount of information provides sufficient justification for the policy requirements. The HBF may have expected to see information in relation to the proportion of people that may need an accessible home from the social rented tenure for example, or in relation to the how the need is consistent across the Borough rather than in particular locations, whether there were any sizes or types of homes that were of particular need for example will it be single people, older couples or will it be family homes with facilities for older or disabled members.
20. The SHMA also does not provide any evidence in relation to accessibility and adaptability of the existing stock in Wakefield. The HBF do not consider that this provides sufficient justification to introduce the optional standards.
  - 1) *Is there sufficient information on the size and type of dwellings currently being built to allow the impacts of adopting the minimum space standards (as set out in Policy WLP 3) to be properly assessed? What implications will the standard have on scheme densities and housing yield?*
21. This policy requires all new homes to comply with the Nationally Described Space Standard (NDSS). The NDSS as introduced by Government, are intended to be optional

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

and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis.

22. PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states that *'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:*
- **Need** – *evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
  - **Viability** – *the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
  - **Timing** – *there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions'.*
23. The Council will need robust justifiable evidence to introduce any of the optional housing standards, based on the criteria set out above. The HBF considers that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional. The HBF does not consider that the Council currently has the evidence to demonstrate that this standard is necessary and it has not appropriately considered the implications of introducing such a standard.
24. The National Housing Space Standards Need Assessment document provides the Council's evidence. The Council have considered 25 housing schemes, comprising 1,105 homes, and they measured 145 dwellings within this. They suggest that their findings show that only 14% of the dwellings measured complied with the NDSS. The Council, therefore, consider that this means that there is a need for the NDSS to be introduced.
25. The HBF does not consider that this is sufficient evidence to demonstrate need for the introduction of the NDSS. The Council have not provided evidence to show that these homes have not sold or that the residents of these properties are in anyway unsatisfied with their home. They have also provided no consideration of how these properties compare to other properties within the market area. The HBF considers that if the Government had just expected all properties to be built to NDSS that they would have made these standards mandatory not optional.
26. The HBF considers that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required

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

number of bedrooms. The industry knows its customers and what they want, our members would not sell homes below the enhanced standard size if they did not appeal to the market.

27. It should be noted that the HBF's Annual Industry Customer Satisfaction Survey<sup>4</sup> published March 2020 and completed by 63,418 new homeowners highlights that 91% of people who have bought a new home would do so again. It also highlights that 93% of homeowners are satisfied with the internal design and layout of their new home. This does not suggest that new homeowners have issues with the size of rooms provided or that there is a need for the NDSS to be introduced.

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<sup>4</sup> <https://www.hbf.co.uk/policy/policy-and-wider-work-program/customer-satisfaction-survey/latest-results/>