

Planning Policy
Wyre Council
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SENT BY EMAIL
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18/01/2022

Dear Planning Policy Team,

WYRE LOCAL PLAN PARTIAL REVIEW: PUBLICATION DRAFT

1. Thank you for consulting with the Home Builders Federation (HBF) on Publication Draft Wyre Local Plan Partial Review Schedule of Revisions to the Wyre Local Plan (2011-2031)
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.
3. The Council is undertaking a Partial Review, with policies SP1: Development Strategy, SP4: Countryside Areas, HP1: Housing Requirement and Supply, HP3: Affordable Housing, HP4: Exception Sites and EP5: Main Town Centre Uses being reviewed.

Chapter 1: Introduction

4. New paragraphs 1.2.5 and 1.2.6 set out the Council's update to the objectively assessed housing need for Wyre. It identifies a new housing requirement figure of 296net dwellings per annum (dpa). It sets out the total housing requirement for the Plan period at 7,232 net dwellings with 460dpa between 2011 and 2018/19 and 296 dpa between 2019/20 and 2031.
5. The 296dpa identified as the proposed housing requirement appears to be based on the current local housing need (LHN) as identified by the Standard Method using the 2014 Sub National Household Projections (SNHP), 2021 as the current year and 2020 affordability ratio of 6.29. The HBF generally supports the Council in using the standard method as the starting point to assess the housing need for the area. However, the HBF considers that the housing need is likely to be higher than the housing requirement currently identified. The PPG¹ sets out that there may be circumstances where it is appropriate to consider whether the actual housing need is higher than the standard method indicates. These include growth strategies for the area, strategic infrastructure improvements, meeting an unmet need from neighbouring authorities and where previous levels of delivery or previous assessments of need are significantly greater than

¹ PPG ID: 2a-010-20201216



the outcome of the standard method. The HBF recommends that the Council investigate these circumstances and consider if a further increase in the proposed housing requirement is required.

6. The proposed housing requirement is a significant decrease from the housing requirement in the current Local Plan of 460dpa. It is also significantly below the 433dpa that have been provided on average over the period 2016/17 to 2020/21. The HBF considers that the housing requirement should be increased to better reflect this evidence.

| Housing Completions (taken from DLUHC Table 122: Housing Supply, net additional dwellings by LA ²) | | | | | | |
|--|---------|---------|---------|---------|---------|------------|
| | 2016/17 | 2017/18 | 2018/19 | 2019/20 | 2020/21 | Average |
| Wyre | 462 | 370 | 396 | 361 | 576 | 433 |

7. The HBF also notes that the adopted Local Plan identified an annual affordable housing need of 134dpa in the first five years up to 2022 and rising to 189dpa thereafter. The Council does not appear to have updated the evidence in relation to the affordable housing need or proposed to amend this identified need within the Local Plan. This identified affordable housing need would be a significant proportion of the proposed housing requirement. The HBF considers that the housing requirement should be increased to allow for this affordable housing need to be met.
8. It is noted that the Council do not propose to amend the employment land requirement, the HBF is concerned that this reduction in the housing requirement will lead to an imbalance between economic development and residential development. The NPPF³ is clear that planning policies should seek to address potential barriers to investment such as inadequate housing provision. The HBF considers that the housing requirement should be increased to allow for an appropriate balance between employment and housing, as this will help to create a more sustainable area.
9. The HBF does not consider that the proposed change to the housing requirement is sound, as it is not positively prepared, justified or consistent with national policy.

Chapter 4: Local Plan Strategy

10. Paragraph 4.1.6 is proposed to be amended to identify the housing requirement as 296dpa and 7,232 dwellings over the Plan period, based on the use of the standard method for the period 2019/20 and 2031.
11. The HBF does not consider that the proposed change to the housing requirement is sound, as it is not positively prepared, justified or consistent with national policy, for the reasons set out in paragraph 5 to 9 above.

Chapter 5: Strategic Policies

² <https://www.gov.uk/government/statistical-data-sets/live-tables-on-net-supply-of-housing>

³ Paragraph 82 NPPF 2021

12. The Council proposes to amend Policy SP1 to read 'within the period 2011 to 2031, the Local Plan will deliver a minimum 7,232 dwellings and 43 hectares of employment land'. This is a reduction in the housing requirement from 9,200 dwellings in the previous iteration of the Plan.
13. The HBF does not consider that the proposed change to the housing requirement is sound, as it is not positively prepared, justified or consistent with national policy, for the reasons set out in paragraph 5 to 9 above.

Chapter 7: Housing

14. Again, the Council propose to amend the text in relation to the housing requirement. They have also updated the supply information with the table now showing 3,490 completions, 762 dwellings on large sites with permission, 363 dwellings on small sites with permission, 2,573 dwellings on allocated sites with permission, 1,885 dwellings on allocated sites without permission and a windfall allowance of 350 dwellings. It is noted that the Council propose for the windfall allowance to take effect from 31st March 2024.
15. The Council propose to replace Policy HP1 with the following: *'There is a minimum housing requirement of 460 net additional dwellings per annum between 2011 and 2019. There is a minimum housing requirement of 296 net additional dwellings per annum between 2019 and 2031. Between 2011 and 2031, the Local Plan will deliver a minimum of 7,232 net additional dwellings, of which, 5,192 will be on allocated sites in policies SA1, SA3 and SA4'*.
16. The HBF does not consider that the proposed change to the housing requirement is sound, as it is not positively prepared, justified or consistent with national policy, for the reasons set out in paragraph 5 to 9 above.
17. The Council also propose to amend Policy HP3 to ensure consistency with the PPG in relation to First Homes it will read: *'The size, type, mix and tenure of affordable dwellings provided shall be negotiated on a case by case basis having regard to the most up-to-date Strategic Housing Market Assessment, Rural Affordable Housing Needs Survey and the requirement of national policy and national planning guidance, including First Homes'*.
18. The Council also propose to amend Policy HP4 to include First Homes and entry level exceptions in line with the NPPF.
19. The HBF considers that reference to First Homes and the requirements of the NPPF in relation to affordable homeownership are appropriate. The HBF considers that the policy would benefit from further information within the justification text as to how this will be applied in practice.

Future Engagement

20. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

21. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Joanne Harding', with a stylized flourish at the end.

Joanne Harding
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