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Dear Planning Policy Team,

## **WYRE LOCAL PLAN FULL REVIEW: SCOPING CONSULTATION AND CALL FOR SITES**

1. Thank you for consulting with the Home Builders Federation (HBF) on the Wyre Local Plan Full Review Scoping Consultation and Call for Sites.
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 adopted the Local Plan in February 2019, and they have started an early partial review of the Plan in line with Policy LPR1 in relation to meeting the objectively assessed housing need. The Council has taken the decision to commence a full review of the Plan, this consultation is to determine the scope of the new Plan.

### **Plan Period**

4. The current Plan covers the period 2011 to 2031. The HBF considers that any review should ensure that the Plan covers a period of 15 years from the adoption of the Plan. This is likely to mean the Plan will need to cover the period until 2040 and will mean that much of the evidence that had supported the previous Plan will need to be updated.

### **Housing Requirement**

5. The HBF notes that the Council are considering the housing requirement as part of the partial review. However, it is likely that the housing requirement will require further consideration as part of any Plan Review, particularly in relation to any increase in the Plan period, and giving consideration to the development strategy included in the Plan.

### **Green Belt**

6. The HBF considers that the Council will need to assess their housing land supply and any other circumstances that may lead to the need to remove land from the Green Belt. The Council are likely to need to update their Green Belt Review to assess parcels of land against the purposes of the Green Belt, and determine if they are appropriate to be removed from the Green Belt designation.



### **Affordable Homes**

7. The HBF considers that the Council will need to update their affordable housing policy to reflect the Government's requirements in relation to First Homes and Affordable Home Ownership. The Council are also likely to need to update their evidence in relation to affordable housing need and viability to ensure that it is up to date and appropriate to support any updated requirements in the Plan.

### **Optional Standards**

8. If the Council wishes to adopt the optional technical housing standards in relation to accessible & adaptable homes, water and nationally described space standards (NDSS) the Council should only do so in line with the Governments guidance set out in the PPG.
9. In relation to the accessible and adaptable homes the PPG<sup>1</sup> 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.
10. In relation to the water standards the PPG<sup>2</sup> states that it will be for the authority to establish a clear need for their introduction based on existing sources of evidence, consultations with the local water and sewerage company, the Environment Agency and catchment partnerships and consideration of the impact on viability and housing supply.
11. In relation to the NDSS the Council need to provide justification for the standards taking into account, need, viability and the need for a transitional period in line with the requirements for the PPG<sup>3</sup>.

### **Viability**

12. The HBF considers that any policy requirements contained within the Plan should be informed by evidence of need and an assessment of viability. If the policies contained within a Plan are not viable this will lead to the non-delivery of homes and potentially the Plan.

### **Site Allocations**

13. The Council's housing land supply should include a short and long-term supply of sites with both strategic and non-strategic allocations for residential development. Housing delivery is optimised where a wide mix of sites is provided, with a range of sites by both size and market location. A wide mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice and competition in the land market. The Council should identify at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target in line with the NPPF requirements. The Council should also provide some headroom

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<sup>1</sup> ID: 56-007-20150327

<sup>2</sup> ID: 56-015-20150327

<sup>3</sup> ID: 56-020-20150327

between its minimum housing requirement and overall housing land supply. Whilst there is no numerical formula to determine the appropriate quantum of headroom, if the Local Plan is highly dependent upon one or relatively few sites and geographical locations then greater numerical flexibility is necessary than where supply is based on a more diversified portfolio of sites.

### **Future Engagement**

14. 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.
  
15. 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 cursive script, appearing to read 'Joanne Harding'.

**Joanne Harding**  
**Planning Manager – Local Plan (North)**

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