

Addendum to Matter 3: Strategic policies & housing

Issue 1: Housing need and the approach to supply

1. Is the identified need of 13,360 homes as set out in Policy WS 1.1 soundly based, and does it accord with the evidence and national planning policy and guidance?

1. The Council proposed to amend the plan period to 2022 to 2039, and to amend the housing requirement to 13,600 (800dpa) to reflect this period and an updated LHN.
2. The HBF does not consider that this proposed amendment is sound. There is no evidence or justification for changing the housing requirement or the approach taken to the housing requirement at this stage in the Plan preparation. There is also no justification or evidence to support the need to amend the base date of the Plan.

Issue 2: Affordable housing and housing mix

1. Does Policy WS3.1 set out a justified and effective approach to securing housing to meet affordable housing need in Wirral over the plan period?

3. The HBF continues to consider that insufficient affordable homes will be provided.
4. The Councils Response to AD06 accepts that annual delivery has not achieved 374dpa, and the next couple of years are still unlikely to meet the 374dpa. The response also highlights the role of RSL and public initiatives in providing affordable homes.
5. The HBF considers that given the historic reliance on RSL provision, and a historic trend of less than 374dpa being provided, that this cannot be relied upon by the Council to meet the need in the future either. The HBF considers that the only way affordable housing provision can be increased is by increasing the provision of affordable homes from S106, and this can only be done by increasing the provision for homes on sites in deliverable and viable locations.

2. Why does the affordable housing needs figure differ from 705 dpa previously evidenced? Is that robust?

6. The Council's Response to AD06 identifies¹ there is an increase in existing households in need, from 12,705 to 14,865 households and that the current gross unmet need after affordability testing has also increased, from 7,326 to 8,726. Highlighting the actual increasing need for affordable homes, rather than a reduction.
7. The response also states that if the affordable housing need backlog was cleared over five years (1,246dpa) this would not be realistic as it would be significantly higher than the annual need for housing in general². The HBF does not consider that this is appropriate reason for not seeking to address the need or for not considering an uplift to address the affordable need.

¹ Paragraph 2.28 and 2.29 of the Council's response to Additional Documents AD06 Affordable Housing, data taken from Table C.7 of the SHMA Technical Appendices (October 2021)

² Paragraph 2.57 of the Council's response to Additional Documents AD06 Affordable Housing

Home Builders Federation (HBF) (ID: 1237833)
response to the Inspector's Matters, Issues and Questions for the
Examination of the Wirral Local Plan

8. The Council state that the SHMA sets out why no further uplift for affordable housing was recommended³. The HBF notes that the SHMA only states that given the scale of ongoing affordable housing delivery it is not necessary at this time to recommend a further uplift. Given previous data about the historic provision and potential future provision, the HBF does not consider that this is sufficient justification for not including an uplift for affordable housing.

³ Paragraph 2.62 of the Council's response to Additional Documents AD06 Affordable Housing