



THE HOME BUILDERS FEDERATION

Planning Policy,
Wyre Council,
Civic Centre,
Breck Road,
Poulton-le-Fylde,
FY6 7PU.

Date: 7th August 2015

Email: planning.policy@wyre.gov.uk

Sent by Email only

Dear Sir / Madam,

Wyre Local Plan: Issues and Options

1. Thank you for consulting with the Home Builders Federation (HBF) on the issues and options for the Wyre Local Plan.
2. The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock.
3. We would like to submit the following comments to the questions posed in the consultation document.

Question 1: Do you agree that the Spatial Portrait set out above is factually correct? Is there anything that should be added, deleted or amended?

4. The spatial portrait (paragraph 2.11) usefully identifies the number of dwellings which have been completed between 1st April 2003 and 31st March 2014, which provides an average of 242 dwellings per annum (dpa). Since 2011 it is understood that dwelling completions have been lower at around 200dpa. This figure is significantly less than the potential housing requirements set out within the Fylde Coast Strategic Housing Market Assessment 2013 (SHMA 2013), which identified a demographic led housing requirement of 377dpa and economic led housing requirement of 485dpa between 2011 and 2030. Whilst the actual housing requirement is still to be fully considered the spatial portrait could usefully provide further discussion around this issue.
5. The National Planning Practice Guidance (PPG) identifies a number of key housing indicators, referred to as market signals (paragraph 2a-019). These

include; land prices, house prices, rents, affordability, rate of development and overcrowding. To enable a full understanding of these issues it would be useful if the housing section of the spatial portrait provided a brief summary of each.

Question 2: Have the key issues been identified? Are there any others you feel the Local Plan should address?

6. The importance of housing delivery to the wider economy should not be underestimated. The HBF is therefore disappointed that there is no reference within the economy sections of the spatial portrait or key issues chapters on the contribution housing provides to the wider economy. The HBF has recently undertaken work upon the economic impacts of housing development. This research outlines that over the last year within Wyre housing delivery has provided 1,075 jobs, 10 apprenticeships and over £320,000 in council tax as well as many other benefits. Increasing the rate of housing delivery over the plan period will have a significant positive effect upon the local economy. Given the need to significantly increase housing delivery across the area it is unclear why Table 2.2 suggests that the potential for future growth within the construction industry is low. Further information upon the economic benefits of housing development can be found on the HBF website (www.hbf.co.uk).
7. Whilst the housing section (paragraphs 3.10 to 3.14) accurately identifies many of the key housing issues facing the area, there is little emphasis placed upon the need to increase the delivery of market housing. As already mentioned, the 2013 SHMA indicates a significant increase in delivery will be required to meet the objectively assessed housing needs of the area. The identification of the scale of the need for market housing together with mechanisms for delivery are likely to be two of the most significant issues the Local Plan will have to address. In terms of delivery the Council, together with stakeholders, will need to identify suitable housing allocations to ensure that the housing needs of the area can be met in full, we provide further commentary upon this in response to question 6.
8. The HBF agrees with the statements in paragraph 3.13 that a greater mix of housing sites will be required in the future. The HBF note that the Council has been successful in promoting the re-development of previously developed land in the past and this success combined with the need to significantly increase the rate of housing delivery over the plan period inevitably means that increased rates of development upon greenfield sites will be required.
9. The HBF also agrees that the density of development is a further key issue and one which should not be taken lightly. Whilst the NPPF enables the Council to set out its density requirements for development the HBF strongly recommend that any such requirement is not overly prescriptive as this can not only have a negative impact upon the wider setting of a development but also upon the economic viability and marketability of a scheme. A flexible approach to density will enable developments to respond to local character as well as viability and market needs.

Question 3: Do you support the Vision for Wyre and feel that it reflects the key challenges and opportunities? Is there anything that should be added to, amended or deleted from the Vision in order to improve it?

10. The HBF generally support the vision and it is considered to largely reflect the key challenges and opportunities. The HBF is particularly supportive of the desire to provide economic growth within Wyre, it is however important that the housing requirement is fully aligned with the economic growth aspirations of the plan.

11. The HBF is also encouraged to note the inclusion of housing, providing housing choice and meeting the needs of the community as part of the vision. However we recommended paragraph 4.5 be further strengthened to state that the housing needs of present and future residents will be fully met within the area, and that the housing needs will be fully aligned with the economic aspirations of the area.
12. Furthermore, whilst it is understandable that the vision is strongly focused upon Wyre, there is no discussion of how the plan and area will interact with neighbouring authority areas. This is particularly important in the context of housing where the 2013 SHMA indicates that the housing market area spans Wyre, Blackpool and Fylde Council areas. It is therefore recommended that consideration be given to inclusion of further text within the vision that addresses the key interactions and working relationships with neighbouring authorities. This would not only strengthen the vision but also provide useful context for the Councils responsibilities under the 'Duty to Co-operate'.

Question 4: Do you agree with the Strategic Objectives? Is there anything that should be added, deleted or amended?

13. The HBF generally support the strategic objectives, particularly those relating to economic growth and housing delivery. It is, however, considered that strategic objective 6 could be improved, the following amendments are recommended;

*'To provide a range **and choice** of new, high quality housing to meet the **full** needs of all sections of Wyre's community, including affordable housing and housing for the elderly;'*

Question 5: Which of the options do you think should be taken forward as the Spatial Strategy showing where development will be directed? Can any of the Options be amended to make it more sustainable, deliverable or to increase the extent to which it would help to achieve the Vision and Strategic Objectives? Is there an alternative or hybrid option which would be more appropriate?

14. It is difficult to comment upon the relative merits of each option without a fuller understanding of the housing requirement, the proposed split of development between settlements, the deliverability of the options including economic viability considerations and whether it would be appropriate to release Green Belt, the latter will need to be informed by a thorough Green Belt Review.
15. It is important that whichever option is chosen the Council can demonstrate that there are sufficient sites which can be delivered within current market conditions to ensure that the plan requirements are met. It is therefore important that the Council continue to work with the development industry to ensure that all such sites are identified at an early stage in the plan making process.
16. The HBF supports the principles of sustainable development and it is therefore considered appropriate that development is focused upon the larger settlements and close to existing employment and transport opportunities. It is, however, equally important that the needs of rural areas are also delivered to ensure that the smaller settlements remain viable and sustainable in their own right. In this regard, and based upon the limited evidence available, the HBF consider that a hybrid option which combines options 1 and 2 would appear the most appropriate. This hybrid would enable development to utilise the deliverable opportunities available within the main urban areas of Fleetwood, Cleveleys, Thornton and Poulton-le-Fylde whilst also ensuring that the opportunities presented along the A6 corridor including the North Preston Growth Area are not missed. It appears that such an option would

also limit the deliverability problems, due to viability, associated with option 1 whilst still enabling regeneration to occur in these areas.

17. It is recommended that whichever option the Council identifies as the most appropriate that it does not seek to phase site delivery. To provide the increase in housing delivery required to meet the housing needs of the area will require a wide variety of sites to deliver across as wide an area as possible early in the plan period to ensure that the number of sales outlets are maximised. Restricting sites to later phases of the plan would not provide the right conditions to ensure that the required step change in delivery can be achieved.

Question 6: Sites

18. The HBF does not wish to comment upon the acceptability or otherwise of individual sites. It is, however, important that all the sites contained within the plan are deliverable over the plan period. To provide the maximum opportunities for delivery discussions should be held between the Council and site promoters / developers so that a full appreciation of any barriers to delivery are understood. It is also imperative that the obligations placed upon market housing by plan policies are not unduly onerous so as thwart development coming forward. The HBF would be willing to discuss general issues concerning delivery and economic viability further with the Council if necessary.

19. It is also important that the plan not only seeks to provide sufficient development opportunities to meet the housing requirement but also provides a buffer over and above this requirement. The reasons for the inclusion of such a buffer are two-fold. Firstly the NPPF is clear that plans should be positively prepared, aspirational and significantly boost housing supply. In this regard the housing requirements set within the plan should be viewed as a minimum requirement, this interpretation is consistent with numerous inspectors' decisions following local plan examination. Therefore if the plan is to achieve its housing requirement as a minimum, it stands to reason that additional sites are required to enable the plan requirements to be surpassed. Secondly, it is inevitable, due to a variety of reasons, some sites will either under-perform or fail to deliver during the plan period. A buffer of sites will therefore provide greater opportunities for the plan to deliver its housing requirement. The HBF recommend a 20% buffer of sites be included within the plan.

Further Consultations

20. 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 in the footer to this response for future correspondence.

Yours sincerely,



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