

Planning Policy
Wyre Council
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FY6 7PU

SENT BY EMAIL
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24/10/2018

Dear Sir / Madam,

WYRE LOCAL PLAN: MAIN MODIFICATIONS CONSULTATION

Thank you for consulting with the Home Builders Federation (HBF) on the Wyre Local Plan Main Modifications consultation.

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.

The HBF are pleased to see that the Council are now close to the completion of their Local Plan and we would like to submit the following representations in response to the Council's proposed main modifications.

MM/002: Introduction (1.4 The 'Duty to Co-operate')

Whilst it is disappointing that the full OAN cannot be met either within Wyre or the housing market area at this time, the HBF considers that the modification to insert new paragraphs in relation to the Duty to Cooperate, the OAN and the Local Plan Review adds clarity and is beneficial.

MM/003: Local Plan Strategy

As stated above, whilst it is disappointing that the full OAN cannot be met either within Wyre or the housing market area at this time, the HBF considers that the modification to paragraph 4.1.21 in relation to a commitment to ongoing engagement is valuable. The commitment to an early review and therefore the modification to paragraph 4.1.21 is also supported.

MM/004: Strategic Policies (5.1 Introduction)

The HBF are supportive of the proposed amendment and the increase in the proportion of provision of the housing OAN.

MM/005: Strategic Policies (Policy SP1 Development Strategy)

The HBF are generally supportive of the proposed modification to Policy SP1, point 3, including the addition of 'a minimum' and the increase in the housing requirement.

MM/022: Housing (7.2 Housing Land Supply)

The HBF continues to have concerns in relation to a windfall allowance, as set out previously. However, the need to avoid double counting is supported.

Paragraph 7.2.5 states that the most appropriate way to deal with any shortfall since 1 April 2011 is for the shortfall to be met over the remainder of the Local Plan period. The HBF continue to consider that it is preferable to address any shortfall in delivery as soon as possible and preferably using the Sedgefield method, and that whilst that may be difficult in the short term, the Council should be actively working with homebuilders to deliver homes and reduce the shortfall.

The HBF agree with the addition of test to paragraph 7.2.6 to states that the figure in Policy HP1 is expressed as a minimum and there is no planning barrier to the early delivery of sites if circumstances and market conditions allow.

The HBF do not consider it is necessary to add the additional line at the end of paragraph 7.2.6 stating that the Sedgefield approach is not realistic, and it would lead to the Plan becoming out of date after adoption. It is considered that the final sentence is not effective as it adds little to the plan, and that it does not support a positively prepared plan as the issue identified could be resolved through the proactivity of the Council and housebuilders.

New paragraph 7.2.7 whilst it is considered that based on previous definitions of persistent under-delivery the 20% buffer would be appropriate it is noted that going forward this plan will be used in decision making alongside the 2018 NPPF. The 2018 NPPF provides details as to what buffer should be applied and in what circumstances. It is therefore queried if the addition of this paragraph is necessary or appropriate.

MM/023: Housing (Policy HP1 Housing Land Supply)

The HBF is supportive of the addition of 'a minimum', the addition of 'at least' and the increase in the housing requirement, within point 1 of Policy HP1. The HBF also supports the deletion of point 2 of the policy.

MM/024: Housing (7.3 Housing Mix)

The HBF supports the recognition within the text that the policy does not seek to impose any specific Building Regulation 'optional standards' but that it provides a flexible framework.

MM/026 Housing (7.4 Affordable Housing and Policy HP3 Affordable Housing)

The amendment to paragraph 7.4.2 and to Policy HP3 to increase the threshold to 11 or more dwellings is supported.

MM/034: Housing (Policy HP9 Green Infrastructure in new residential developments)

The amendment to Policy HP9 to increase the threshold to 11 or more dwellings is supported.

MM/089: Monitoring the Local Plan

The HBF is generally supportive of the proposed modifications particularly reference to the Housing Implementation Strategy and the Local Plan Review.

MM/090: New Policy LPR1 – Wyre Local plan Review

The HBF are supportive of the identification of the need to review the plan and the identification of clear timescales for that to happen.

MM/091: Table 10.1

The HBF generally supports the proposed modifications to the monitoring framework, and consider that this will help to ensure that monitoring is more effective.

Future Engagement

I trust that the Council and the Inspector will find these comments useful as they continue to progress the Local Plan to adoption. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

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,



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