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Planning & Transportation Services  
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SENT BY EMAIL  
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26/06/2023

Dear Planning Policy Team,

## **WAKEFIELD LOCAL PLAN: MAIN MODIFICATIONS**

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

### **Publication Draft Plan Volume 1: Development Strategy, Strategic and Local Policies**

#### **MM1.6: Paragraph 6.11**

3. The HBF supports the Council in amending this text to delete reference to the housing requirement being a range.

#### **MM1.7: Policy WSP5**

4. The HBF supports the Council in removing reference to a range within the policy text in relation to the housing requirement. However, the HBF continues to consider that the housing need could be higher than the 1,400 dwellings per annum housing requirement identified in the policy.

#### **MM1.12: Paragraph 6.14**

5. The Council propose to insert a new paragraph which states that the Local Plan does not provide a housing supply that meets the housing requirement over the Plan period. It identifies a housing supply of 25,594 dwellings compared to the housing requirement of 26,200 dwellings, therefore identifying a shortfall of 1,006 dwellings.
6. The HBF is concerned that the Council propose to adopt a Plan that will not meet the housing requirement and with little detail as to how the Council will work positively to



ensure that this shortfall is met, or how they will closely monitor housing delivery to try to promote additional dwellings. The HBF does not consider that this currently proposed modification is sound, as it is not justified or positively prepared.

7. The HBF considers that if this policy is to be implemented as is, it should include an early review mechanism, and / or the potential to include an additional presumption in favour of sustainable development if they are not delivering as expected.

**MM1.17: Policy WSP6**

8. The Council propose to amend the affordable housing policy to remove 'minimum' the HBF considers that this is an appropriate modification, and adds clarity to the policy.

**MM1.70 Policy WLP**

9. The Council propose to delete the reference to new housing achieving at least a 20% reduction in carbon emissions. The HBF considers that this deletion is appropriate.

**Future Engagement**

10. 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.
11. 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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