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SENT BY EMAIL  
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06/12/2017

Dear Sir / Madam,

## **WAKEFIELD DISTRICT LOCAL PLAN 2036: EARLY ENGAGEMENT**

Thank you for consulting with the Home Builders Federation on the Wakefield District Local Plan.

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.

We would like to submit the following comments upon selected questions posed within the Early Engagement consultation document. These responses are provided in order to assist Wakefield Council in the preparation of the emerging local plan. The HBF is keen to ensure that Wakefield Council produces a sound local plan which provides for the housing needs of the area.

### **Question 1: a. Do you support our Vision for Wakefield? b. Should anything else be included to deal with key issues for the district?**

There are a number of positive elements within the vision including 'supporting a high quality of life'; 'making a significant contribution to the prosperity of Leeds City Region'; and 'residents and businesses will benefit from . . . inclusive economic growth'. However, the vision does not make any direct reference to housing even though homes are listed as a key issue to deal with. Meeting the housing needs of the area should be a key element of the plan, as it will not only provide social benefits but is required if the Council is to meet its economic aspirations. The HBF therefore

recommends reference be made to meeting the housing needs of current and future generations within the vision statement.

It is noted that the document states that the *'plan will make provision for the objectively assessed need for sustainable development'*.

**Question 2: a. Do you think the Council should plan for a reduced level of growth of new homes? b. What level of growth of new homes do you think the Council should plan for?**

The HBF does not consider that the Council should plan for a reduced level of growth of new homes.

The Wakefield Strategic Housing Market Assessment 2016 (SHMA 2016) identifies that the alignment of housing growth with economic growth is a key requirement, and goes on to state that *'it is important that the OAN calculation takes account of increased dwelling need linked to jobs growth'*. The HBF considers that it is important for the Council to deliver an appropriate level of housing growth that supports economic growth. The SHMA 2016 identifies an adjustment to support jobs-led dwelling need of 516 dwellings. It is likely that even if the demographic need were to be updated to reflect the latest household and population projections that the need for further adjustments to be made would remain.

The HBF recommends that the Council update their evidence base appropriately and ensure that the level of new homes planned for is appropriate to support future economic growth, household growth, household aspirations and the need for affordable homes.

**Question 3: Which option do you think we should take and why? And Question 4: Are there other options we should consider?**

The HBF consider that whichever option is selected it is imperative that it is demonstrated to be deliverable and viable over the plan period. This assessment should conform to footnote 11 of the NPPF, paragraph 47.

**Question 5: Do you think we are right to raise aspirations about the quality of design and places?**

Whilst aspirations to deliver better places and higher quality design are generally considered positively these need to be weighed against the deliverability of sites. It is important that the Council takes into consideration the viability of development and the need for flexibility, allowing individual schemes to determine the appropriate development for the site.

**Future Engagement**

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.

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 black ink, appearing to read 'Joanne Harding', with a stylized, cursive script.

**Joanne Harding**

**Local Plans Manager – North**

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