

The Forward Planning Manager
Wirral Council Economic and Housing Growth
PO Box 290
Brighton Street
Wallasey
CH27 9FQ

SENT BY EMAIL
localplan@wirral.gov.uk
26/10/2018

Dear Sir / Madam,

WIRRAL LOCAL PLAN: DEVELOPMENT OPTIONS REVIEW CONSULTATION

Thank you for consulting with the Home Builders Federation (HBF) on the Wirral Local Plan Development Options Review.

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 make comments on the following areas of the Development Options proposals.

The HBF is keen to work with the Council in order to achieve an adopted local plan which enables the delivery of homes across the Wirral. The following comments identify some areas where the HBF consider that any future documents would benefit from further evidence or modifications.

Plan Period

Whilst the HBF would normally support the use of a 15 year plan period, given the time it has taken the Council to prepare this plan and the dated nature of the UDP upon its adoption, the HBF would encourage the Council to consider a longer plan period.

Housing Requirement

The Development Options consultation suggests that the Council are intending to utilise the OAN produced by the Standard Methodology. The FAQs Paper states that this calculation currently shows an overall minimum need for new housing of 12,045 new dwellings over 15 years, equal to 803 dwellings per year (net of demolitions and other losses). The HBF notes that the MHCLG figure is applicable for ten years but

the Council has extrapolated this over the plan period. The FAQs Paper goes on to state that this is broadly consistent with the Council's earlier findings and a more recent assessment undertaken at Liverpool City Region Level. The paper also highlights that it does not allow for economic growth.

Planning Practice Guidance (PPG) draws attention to the wording of the Government's response to the revised NPPF which states that *'the Government was clear that reforms set out (which included the introduction of a standard method for assessing housing need) should lead to more homes being built. In order to ensure that the outputs associated with the method are consistent with this, we will consider adjusting the method after the household projections are released in September'*. Therefore, the Council should be aware that the housing figures provided by the MHCLG standard methodology are likely to change.

The figure generated by the standard method is considered as the minimum starting point, it is noted that it relies on past growth trends, which in the case of the Wirral may have been affected by the lack of appropriate site allocations and poor housing delivery. The HBF considers that there are circumstances where an uplift will be appropriate such as where growth strategies are in place (for example the Northern Powerhouse) or where funding is in place to facilitate growth such as the Housing Infrastructure Fund. It is therefore clear that in the case of Wirral an uplift would be considered appropriate.

Housing Supply

The Briefing Session Presentation identifies 2,634 dwellings with planning permission as of April 2018, 90 proposed housing allocations with a capacity for 2,403 dwellings, and 997 homes proposed at Wirral Waters Northbank. This differs slightly from the figures reported to Cabinet which identified 2,572 dwellings with planning permission, potential sites with capacity for 4,026 dwellings, 1,100 dwellings at Wirral Waters, 750 dwellings from conversions and 900 dwellings from windfall. The HBF recommend that the Council ensure that they have a good source of evidence for their supply and that it is used consistently.

Within the Briefing Session Presentation, the Council identify a shortfall of 4,990 dwellings, plus a 20% buffer for under delivery giving a shortfall of land for 7,390 dwellings. Within the Cabinet Report a shortfall of 4,794 dwellings is identified, again it would be useful to have consistency in the figures.

Extant planning permissions

The identification of sites with extant permission is noted, however, the HBF would seek assurance from the Council in relation to their consideration of the likely delivery of these sites. The Council will be aware that sites may not be developed for a wide range of reasons, this often leads to a lapse rate in planning permissions. A lapse rate is commonly applied to the supply in the examination of local plans. Ideally the scale of any lapse rate should be determined locally. In the absence of local information, a common approach, which has been accepted at a number of planning appeals, is to provide a 10% deduction in unimplemented housing permissions. It is recommended that this issue be given further consideration.

Windfall and Conversion Allowance

The HBF recommends that if the Council intends to include an allowance for conversions and windfalls that they have an appropriate evidence base to support this. The HBF also considers that historic trends may not always be an accurate reflection, as we would expect the delivery of homes from these sources will reduce over future years as sites allocated in the Local Plan are brought forward. The HBF would recommend that these allowances are not included in the supply and instead form part of the flexibility in supply. However, if an allowance is to be included within the supply the HBF would suggest that the allowance is not included within the first three years of the Plan to avoid double counting.

Proposed Housing Allocations

The HBF are keen that the Council produces a plan which can deliver against its housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period. The HBF and our members can provide valuable advice on issues of housing delivery and would be keen to work proactively with the Council on this issue.

The HBF also strongly recommends that the plan allocates more sites than required to meet the housing requirement; as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible. The HBF recommends as large a contingency as possible (circa at least 20%) to the overall housing land supply to provide sufficient flexibility for unforeseen circumstances and in acknowledgement that the housing requirement is a minimum not a maximum figure.

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 and planned to an appropriate strategy. The HBF would expect the spatial distribution of sites to follow a logical hierarchy, provide an appropriate development pattern and support sustainable development within all market areas.

The Council's assumptions on sites in relation to delivery and capacity should be realistic based on evidence supported by the parties responsible for housing delivery and sense checked by the Council based on local knowledge and historical empirical data.

Green Belt Review

The NPPF (2018), paragraphs 136 and 137, provides the mechanism for releasing Green Belt through the Local Plan process and requires local authorities to demonstrate exceptional circumstances. The Council will need to ensure that these exceptional circumstances are fully explored in their Local Plan. Providing that the authority is able to demonstrate that it has fully examined all other reasonable options, the need to meet the housing needs of an area has been accepted to meet exceptional circumstances in other Local Plan examinations.

The HBF generally agrees that the requirement to allocate sufficient land for the development of market and affordable housing to meet the identified needs are likely to constitute exceptional circumstances that justify the alteration of Green Belt boundaries through the preparation of the Local Plan. Indeed, it is noted that without such releases the amount of new development that could be significantly below identified needs, this would lead to significant reliance upon neighbouring authorities agreeing to take any unmet needs.

Safeguarded Land

Whilst there is no definitive guidance indicating the amount of land which should be safeguarded the NPPF (2018) is clear that where necessary Local Plans should *'identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period'*, and that local authorities should *'be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period'*. Given that the proposed plan will have a 15-year time horizon it is considered that safeguarded land requirement should seek to match this. This will not only provide a robust long-term Green Belt boundary but will also provide certainty for residents and developers alike in terms of likely growth locations beyond the end of the plan period.

The HBF would also anticipate the plan should provide triggers which would indicate when the safeguarded land would be considered for release, through a plan review. The Council will be aware of the housing delivery test, this will require an action plan to be taken if delivery falls below 95% of the Council's annual housing requirement. The release of safeguarded land could be linked to a trigger if the plan is failing to deliver as anticipated.

Future Engagement

I trust that the Council will find these comments useful as they continue to progress the 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,



Joanne Harding

Local Plans Manager – North

Email: joanne.harding@hbf.co.uk

Phone: 07972 774 229