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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 on Volume 1: Development Strategy, Strategic and Local Policies 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.

### **Vision**

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.

## **Policy WSP 5: Scale and Distribution of Additional Housing**

### Housing Requirement

This policy provides a housing requirement as a range with the lower figure a product of the standard methodology with the top figure set at 1,400 homes each year.

The MHCLG Standard Methodology identified a housing need of 1,033 homes each year for the period 2016-2026 (using the 2014 household projections). The HBF notes that the MHCLG figure is applicable for ten years but the Council intends to extrapolate this over the plan period. 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 Wakefield may have been affected by poor housing delivery (although it is noted there have been improvements in more recent years). The Council will be aware that MHCLG have undertaken a consultation in relation to changes to the parts of PPG relating to the standard method for assessing local housing need. The consultation highlighted that the Government's priorities continue to be to deliver more homes and to do so faster. But it also proposed that for the short-term, the 2014-based data will continue to provide the demographic baseline for assessment of local housing need.

The 2016 SHMA identified an Objectively Assessed Housing Need of 1,524 dwellings each year. Whilst it is noted that the 2016 SHMA is based on the 2012 SNPPs this does not reduce the need to provide for the economic growth of the area. 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 consider that the Council should consider the Standard Method the starting point for the housing requirement and should consider whether it appropriately reflects the affordable housing needs, households who may want to form new households and the economic growth of the area. The HBF continues to recommend 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.

### Windfall and Allocations

The plan proposes to include a windfall allowance and once this is taken into account to allocate sufficient specific sites to deliver the 1,400 homes a year in the period 2017/18 to 2035/36.

The HBF would generally recommend that windfall allowances are not included in the supply and instead form part of the flexibility in supply. However, 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. Again, 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.

The HBF does however, support the Council in seeking to ensure they allocate sufficient land to meet their housing requirement. 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 matters in relation to 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 an appropriate contingency (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.

#### Five Year Supply

The policy states that a five year supply of specific sites will be maintained at all times. Whilst the HBF support the Council in the commitment to maintain a five year supply, it would be useful if the policy provided more detail as to how the Council intends to ensure that this five-year supply is maintained.

#### Spatial Distribution

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.

#### Residential Density

The policy proposes a density of at least 50dph in Wakefield city centre and Castleford and Pontefract town centres and within 500m of a rail and bus station public transport hubs; at least 40dph throughout the rest of Wakefield, Castleford and Pontefract; at least 30dph in other urban areas, local service centres, villages and the Green Belt. The policy does state that in circumstances where individual site characteristics dictate and are justified, a lower density may be acceptable.

The flexibility provided by this policy in relation to individual site characteristics is noted, however, the HBF would recommend further amendments could be made to

create greater flexibility to allow developers to take account of the evidence in relation to demand, market aspirations and viability.

The Council will also need to consider its approach to density in relation to other policies in the plan. Policies such as open space provision, space standards and parking provision will all impact upon the density which can be delivered upon site.

## **Policy WSP 6: Housing Mix, Affordability and Quality**

### Housing Mix

This policy looks for all housing to provide a broad mix of homes, with large sites (60 homes or 2 ha) needing to reflect the local need for different types of specialist housing, for different sizes of homes, price and tenure.

The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to: overly prescriptive requirements; requiring a mix that does not consider the scale of the site; or the need to provide additional evidence. The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location.

It is not clear why a threshold of 2ha or 60 dwellings has been used within this policy, it does not appear to be justified by any evidence.

It is also not clear from the policy what is meant by the requirement for larger sites to provide different types of specialist housing to reflect the local need.

### Affordable Housing

This policy requires sites of 15 or more homes in the urban area or local service areas; and sites of 10 or more homes in villages, the green belt or outside of a settlement to provide 30% of the development as affordable homes.

The 2016 SHMA identifies a need for 604 affordable homes each year. This need for affordable homes is not disputed by the HBF and indeed the HBF generally support the need to address the affordable housing requirements of the Borough. The NPPF is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability. Paragraph 34 of the NPPF (2018) established the importance of viability to ensure that development identified in the Plan should not be subject to such scale of obligations and policy burden that their ability to be delivered might be threatened. The Council will need to confirm that this policy is viable, through its evidence.

The HBF also has concerns that given the extensive variations in the housing market areas across Wakefield district that a blanket approach to the affordable housing target may not be appropriate. The HBF consider that this should be further investigated within the viability evidence.

### **Policy WSP 7: Specialist Housing**

This policy states that *'with regard to market housing for older people sheltered and extra care accommodation and other open market provision is considered as being in use class C3 and relevant housing policies in the Local Plan will be applied to such proposals'*.

Use Classes are as defined by the Town and Country Planning (Use Classes) Order, it is therefore not appropriate for the Council to try to determine what will be considered as C3, or not, within a policy. Currently, Use Class C2 is defined as a use for the provision of residential accommodation and care to people in need of care (other than a use within class C3 dwelling houses). Whilst Class C3 is defined as a dwelling house used by a single person or by people to be regarded as forming a single household or not more than six residents living together as a single household where care is provided for residents or not more than six residents living together as a single household where no care is provided to residents.

The HBF consider that older people sheltered and extra care accommodation can fall within either use class dependent on the facilities, Use Class C3 (low range) or C2 (higher range), and a judgement will need to be made in each case.

### **Policy WSP 19: Digital Infrastructure**

This policy states that development proposals should achieve high quality, mobile and broadband digital connectivity above the level set out in part R1 of the Building Regulations.

The HBF generally consider that digital infrastructure is an important part of integrated development within an area. However, the inclusion of digital infrastructure such as mobile and broadband digital connectivity is not within the direct control of the development industry, and as such it is considered that this policy could create deliverability issues for development and developers. Service providers are the only ones who can confirm access to infrastructure. Whilst, paragraph 112 of the NPPF establishes that local planning authorities should seek to support the expansion of electronic communications networks it does not seek to prevent development that does not have access to such networks. The house building industry is fully aware of the benefits of having their homes connected to super-fast broadband and what their customers will demand.

The HBF consider that in seeking to provide broadband and fibre to homes the Council should work proactively with telecommunications providers to extend provision and not rely on the development industry to provide for such infrastructure.

The Council should also note that Part R of the Building Regulations clearly sets the appropriate standards for high speed electronic communication networks, that are within the control of the housebuilder. It is also not clear within the policy what exactly the Council are asking for over and above the regulations, which makes any assessment of the policy and implications impossible.

### **Policy WSP 23: Mitigating and Adapting to Climate Change and Efficient Use of Resources**

This policy states that the Council will encourage all development to incorporate energy from decentralised and renewable or low carbon sources. It then goes on to state that *'All larger development will be required to incorporate on-site renewable energy generation capacity, unless it is not feasible or viable or there are demonstrable alternative decentralised and renewable, or low carbon sources'*.

The HBF is generally supportive of the use of low carbon and renewable energy, however, it is queried whether this policy is in line with the Governments intentions as set out in Fixing the Foundations, the Housing Standards Review and the PPG, which specifically identified energy requirements for new housing development to be a matter solely for Building Regulations with no optional standards.

The Government has sought to set standards for energy efficiency through the national Building Regulations and to maintain this for the time being at the level of Part L 2013. The WMS published on 25 March 2015 sought to clarify the regulatory regime. At that time the Government decided to improve energy efficiency for residential buildings through Part L of the Building Regulations. The starting point for the reduction of energy consumption should be an energy hierarchy of energy reduction, energy efficiency, renewable energy and then finally low carbon energy. The HBF consider that Policy WSP 23 should allow developers flexibility to select the most appropriate way to achieve the general aims of this policy. For example, it is possible that the general aims of the policy can be achieved by a fabric first approach using the integration of passive design, fabric specification and thermal efficiency measures to reduce energy usage without resorting to renewable energy generation.

### **Policy WLP 2: Accessible Housing Standards**

This policy requires new build residential developments over 0.5ha or 10 or more homes should include 11% of homes at M4(2) standard and 2% of homes at M4(3) standard. It also states that on smaller sites, where percentages would deliver less than one homes, one home should be provided to meet the relevant building regulation.

The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG.

PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for Wakefield which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommend that an appropriate transition period is included within the policy. The Arc4 Supported and Specialist Housing Need Report provides some limited information in relation to the need for accessible and adaptable properties, utilising national data and the 2015 Household Survey, however, the HBF do not consider this work is sufficiently detailed to support the introduction of these optional standards.

The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances; and that policies for wheelchair accessible homes should only be applied to dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.

### **Policy WLP 3: Minimum Space Standards for Homes**

This policy requires all new homes to comply with the Nationally Described Space Standard (NDSS).

The nationally described space standards (NDSS) as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis.

PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states that *'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:*

- **Need** – *evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
- **Viability** – *the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
- **Timing** – *there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions'.*

The Council will need robust justifiable evidence to introduce any of the optional housing standards, based on the criteria set out above. The HBF consider that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional. The HBF do not consider that the Council currently has the evidence to demonstrate that this standard is necessary and it has not appropriately considered the implications of introducing such a standard.

### **Policy WLP 32: Electric Vehicle Charging Infrastructure**

This policy requires all applications for new development to meet the minimum standards of provision for electric vehicle charging points for residential development this is 1 charging point per dedicated parking space and where spaces are unallocated 1 charging point per 10 spaces. Whilst the HBF do not oppose the provision of electric charging points, the policy as worded is currently considered to be overly onerous. An element of flexibility would be beneficial and is considered to be compliant with the NPPF, paragraph 105. The HBF would also question the need

for one charging point per space rather than per dwelling, and would be interested to see the evidence to support this requirement.

The HBF would also encourage the Council to work with the appropriate infrastructure providers to ensure a balanced and flexible optimised energy system that can cope with the potential for a mix of electrical heating systems and electric vehicle systems.

The HBF would also encourage the Council to consider the viability of the provision of electric vehicle charging points particularly if higher standards of charging points are required.

This will also apply to Policy WLP 5: Residential Development in Town Centres, which states that *'proposals should include the provision of space for the storage of sustainable modes of transport such as bicycles and, where appropriate, electric vehicle charging points'*.

#### **Policy WLP 34: District Heating and Cooling Infrastructure**

This policy looks for developments of 10 dwellings or more to propose heating and cooling systems according to a hierarchy set out in the policy. The HBF do not consider that Wakefield should be requiring developments to connect to or to install district heating schemes or restricting the use of particular heating methods. The HBF consider that consideration needs to be given to the justification to this policy. If the policy is to be taken forward then consideration needs to be given not just to whether the development is technically viable but also financially viable and subject to viability testing. The HBF also consider that this policy may cause issues for future occupants as it is restricting future consumer choice to that particular provider of heat.

#### **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,



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