

Planning Policy Wyre Council Civic Centre Breck Road Poulton-le-Fylde FY6 7PU

> SENT BY EMAIL planning.policy@wyre.gov.uk 30/11/2022

Dear Planning Policy Team,

WYRE LOCAL PLAN (INCORPORATING PARTIAL UPDATE OF 2022): MAIN MODIFICATIONS

- 1. Thank you for consulting with the Home Builders Federation (HBF) on the Main Modifications consultation for the Wyre Local Plan (2011-2031) (incorporating the partial update of 2022).
- 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.

Housing Requirement (MM08, MM14, MM15, MM17, MM18, MM20, MM26, MM45)

3. The HBF continues to consider that the amendments to the housing requirements are not sound, as they are not positively prepared, justified or consistent with national policy, and that the housing requirement should be increased. The proposed housing requirement is a significant decrease from the housing requirement in the current Local Plan of 460dpa. It is also significantly below the 433dpa that have been provided on average over the period 2016/17 to 2020/21. The adopted Local Plan identified an annual affordable housing need of 134dpa in the first five years up to 2022 and rising to 189dpa thereafter. The Council does not appear to have updated the evidence in relation to the affordable housing need or proposed to amend this identified need within the Local Plan. This identified affordable housing need would be a significant proportion of the proposed housing requirement.

First Homes (MM27)

4. The HBF considers that the proposed new paragraph stating that the nationally set criteria in the PPG will apply in relation to market discount and price cap until this has been considered through the preparation of a new evidence base for the Local Plan Full Review is appropriate.

Future Engagement



Home Builders Federation HBF House, 27 Broadwall, London SE1 9PL Tel: 0207 960 1600 Email: <u>info@hbf.co.uk</u> Website: <u>www.hbf.co.uk</u> Twitter: @HomeBuildersFed

- 5. 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.
- 6. 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,

Planning Manager – Local Plan (North) Email: Phone: