



# THE HOME BUILDERS FEDERATION

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**Sent by Email only**

Dear Carole,

## **RE: WAKEFIELD PROVISIONAL SHLAA 2015**

Further to the circulation of the Council's Provisional SHLAA 2015 on Friday 11 September 2015, the HBF would like to take this opportunity on behalf of its members to highlight its significant concerns. We are keen to work with the Council to ensure that a robust, realistic and defensible SHLAA can be produced.

The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock.

### **1. Timescales**

The email circulating the Provisional SHLAA 2015 sets a consultation deadline of Friday 2 October 2015, which is only a 3 week window to review the SHLAA methodology, the new Windfall Allowance Report and review nearly 1,000 sites.

Our typical experience is for SHLAA's to be consulted upon for at least 6-8 weeks and as part of that process a meeting of the SHLAA Working Group should be convened. The HBF find this to be the most productive approach. The HBF is concerned that a meeting of the Wakefield SHLAA Working Group has not occurred since September 2008 and we therefore request that such a meeting is established. Without such engagement the robustness of the SHLAA must be brought into question.

## **2. Methodology**

The HBF has concerns with regards to the methodology. The assumptions including density and yields appear to be dated from 2008 and do not reflect current market conditions. The economy has been through major economic upheaval since 2008. The approach to delivery and yields appears to also be based on an understanding from 2008 and as such does not reflect current market conditions. The HBF advocates engaging with developers to understand properly the delivery rates on sites with planning permission or under construction, but also sites in the pipeline, which does not appear to have occurred in this instance. The rates identified in Table 3 appear to be overly optimistic and may artificially inflate the reality of the supply within Wakefield. Whilst it is recognised the SHLAA suggests this is in line with analysis carried out on sites of 50 or more completed over the last few years the HBF and our members would like the opportunity to consider and debate this evidence further including how rates are set for individual sites. Furthermore, the capacity of each site appears to be calculated on a gross site area rather than net, which leads to over inflated expectations.

## **3. Lapsed Permissions**

The HBF is concerned that the methodology explains that sites with lapsed permissions will be put into the 6-10 years category. However, a number of sites with lapsed planning permission are included in the 0-5 year category (e.g. SHLAA refs 669, 575, 641, 550, etc.). This contradicts the methodology and also national guidance on the preparation of SHLAA's.

## **4. Windfall Assumption**

The HBF notes the Council's aspirations to include a windfall allowance when calculating the 5 year land supply, but is concerned that this is being proposed at 600 dwellings per annum or 3,000 dwellings over the 5 year period. The current consultation period provides insufficient time to fully consider the Windfall Allowance Report its evidence base and implications.

## **5. SHLAA Information**

The HBF are concerned that the information circulated is insufficient to allow our members to review sites and respond accordingly. The Annex 1 table lists a considerable number of sites with the same address and the link circulated to the SHLAA maps does not show all the sites. The information circulated is therefore deficient and will not allow our members to respond appropriately. This information needs to be updated and rectified and then recirculated for consultation.

Should you require any further information or clarification then please do not hesitate to contact me.

Yours sincerely

*MJ Good*

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