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Planning, Economic Development & Regulatory Services  
Town Hall  
Market Street  
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SENT BY EMAIL  
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Dear Planning Policy Team,

## **PENDLE LOCAL PLAN: SCOPING REPORT**

1. Thank you for consulting with the Home Builders Federation (HBF) on Pendle Local Plan Scoping Report.
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.

### **Evidence**

3. The HBF supports the Council in looking to update its evidence base, including the preparation of a Housing Needs Assessment (HNA), Strategic Housing Land Availability Assessment (SHLAA), a Review of Urban Capacity and a Viability Study.

### **Plan Period**

4. The Council propose a plan period of 1<sup>st</sup> April 2022 to 31<sup>st</sup> March 2040. The HBF considers that any update should ensure that the Plan covers a period of 15 years from the adoption of the Plan.

### **Proposed Strategic Policies**

5. The Council propose to include a policy setting out the Presumption in Favour of Sustainable Development to reflect paragraph 11 of the NPPF. The HBF considers that this policy is unlikely to be necessary as it is likely to be repetitious of the policies contained within the NPPF.
6. The Council propose to include a policy setting out the development requirements and broad approach to be taken to its delivery. The HBF would expect that housing requirement to reflect the guidance set out in the NPPF and the PPG. The NPPF<sup>1</sup> states that to determine the minimum number of homes needed, strategic policies should be

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<sup>1</sup> NPPF 2021 Paragraph 61



informed by a local housing needs assessment, conducted using the standard method set out in the PPG. The PPG sets out the method for calculating the minimum annual local housing need figure<sup>2</sup>. The HBF would also expect the Council to investigate the circumstances where it might be appropriate to plan for a higher housing need figure as set out in the PPG<sup>3</sup>, these circumstances include where there are growth strategies for the area, where there are strategic infrastructure improvements, where an authority is taking unmet need from a neighbouring authority, and where previous levels of housing delivery, or previous assessments of need are significantly greater than the outcome from the standard method.

7. The Council propose to include a policy in relation to climate change and the steps to be taken to achieve zero carbon development and to address the effects of climate change on new developments. The HBF would encourage the Council to not set any policies or standards that contradict what the Government are trying to achieve through Building Regulations and the move towards the Future Homes Standard. There are numerous potential policy approaches that could contribute to mitigating against climate change and help towards a zero-carbon future including: reducing greenhouse gases through the appropriate the location of development and services; active and sustainable transport; digital technology and connectivity; water issues; renewable energy provision; the impact of development on biodiversity and nature; what resources are used, and waste is produced; air quality; flood and climate resistance; the wider effect housing has on its social and built environment. However, these policies may also require input and collaboration from a broad range of stakeholders, which will also need to be given consideration. The Council will need to ensure that the any policies introduced are deliverable and viable and have the support of all of the industries and sectors involved.

### **Policies Map**

8. The Council suggests that the Housing Allocations, Settlement Boundaries and Open Countryside are likely to be reviewed as part of the Plan. The HBF considers that this is likely to be appropriate.
9. The Council suggests that subject to the findings of new evidence the Green Belt designation is unlikely to be altered. The HBF would remind the Council that it is not possible to determine that the Green Belt will not need to be altered at this stage as the evidence has not been gathered in relation to the Housing Need (HNA), SHLAA or the Urban Capacity. The HBF considers that it is inappropriate to make this assumption at this stage and is concerned that making this sort of public commitment may cause issues in future consultations if the Green Belt does require a review.

### **Monitoring and Review**

10. The Council has set out that they will continue to produce an AMR and set out what they will report on including the number, type, size, tenure and location of new homes. The Council also sets out that they will review the Plan and they include a potential mechanism that would lead to an early review. These triggers include the number of new

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<sup>2</sup> PPG ID:2a-004-20201216

<sup>3</sup> PPG ID: 2a-010-20201216

homes delivered falling to less than 75% of the required total over a rolling three-year period as indicated through the Housing Delivery Test (HDT). The HBF considers that having a monitoring policy setting out when an early review could occur is appropriate, however, the Council could also consider alternative methods that could address any shortfalls in housing supply in the short term, this could include working with the home building industry to bring forward additional sustainable sites.

### **Future Engagement**

11. 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.
12. 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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