



THE HOME BUILDERS FEDERATION

Local Plan Team,
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Email: local.plan@sefton.gov.uk

Sent by Email only

Dear Sir / Madam,

Affordable, special needs and older people's housing SPD

1. Thank you for consulting the Home Builders Federation (HBF) on the scoping report for the Affordable, special needs and older people's housing Supplementary Planning Document (SPD).
2. 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.
3. The scoping report identifies that the SPD will set out how affordable homes will be provided as part of the overall layout of the development, the financial arrangements for providing them, how any exemptions will be applied and guidance on making sure they remain as affordable homes in the long term. In addition it will also consider the different types of special needs and older persons' housing and how these will be provided. It will also set out how the requirements for Lifetime Homes should be met. Presuming draft local plan policies *HC1: Affordable and Special Needs Housing* and *HC2: Housing Type Mix and Choice* remain following the examination of the local plan the general emphasis of the SPD would appear appropriate. The HBF does, however, recommend that the SPD consider the following;

Bed space requirement

4. The HBF does not support the bed space requirement due to the difficulties inherent in its interpretation and the uncertainties this creates. In addition in many cases it also leads to higher overall affordable housing requirements, which consequently impact upon viability. It is also noted that Sefton is the also the only authority within the region which operates such a system.

5. Notwithstanding the above, if the Council is successful through the local plan examination, in retaining the bed space requirement it is considered essential that the SPD provides clear guidance upon its implementation. This could include worked examples.

Off-site contributions

6. It is recognised that the Council anticipates the majority of affordable housing contributions will be delivered on site. However, there will undoubtedly be occasions when this is impractical. In such cases an off-site contribution may be appropriate. The Council should provide explanation through the SPD upon the mechanisms and conditions under which this could occur.

Vacant buildings credit

7. The ministerial statement, 28th November 2014, introduced a vacant buildings credit which is further expanded upon within the Planning Practice Guidance (ID: 23b-022-20141128). The SPD could usefully refer to the credit and provide worked examples to aid interpretation.

Lifetime homes

8. The scoping report and Policy HC2 reference the Lifetime Homes Standard. The HBF supports the need for accessible homes but note that the Lifetime Homes Standard has effectively been withdrawn through the government's housing standards review. The ministerial statement, 25th March 2015, and the amendments to the PPG clearly identify accessibility standards will be implemented through the Building Regulations. Whilst there are two optional standards above Part M these can only be introduced following an examination of a local plan and its associated evidence base.
9. The HBF is unaware that the Council has provided the evidence required by the PPG (ID 56-007-20150327) to implement the optional standards. If the Council is successful in introducing an optional standard via the local plan process the SPD could usefully provide information upon compliance with the standard and any relevant targets.

Information

10. I trust that the Council will find the foregoing useful in the preparation of the SPD and would be happy to discuss these matters further, if required. The HBF would like to be kept informed of the progress of the SPD and any other planning documents.

Yours sincerely,

MJ Good

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