



THE HOME BUILDERS FEDERATION

Local Plan Team,
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Sent by Email only

Dear Sir / Madam,

New Residential Development SPD

1. Thank you for consulting the HBF on the New Residential Development Supplementary Planning Document (SPD) scoping report.
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 the principles and standards for new housing developments to ensure they are high quality and respect and enhance the surrounding area; including guidance on design, layout, access, housing type, density, gardens etc.
4. Presuming draft local plan policy HC3 - Residential development and development in Primarily Residential Areas remains following the examination of the local plan the general emphasis of the SPD would appear appropriate for developments within the designated PRA. We do, however, recommend the Council consider the following additions and amendments to the scope of the SPD.

Building for Life 12

5. The principles set out within Building for Life 12 (BfL12) provide an existing framework for many of the issues identified within the SPD. The BfL12 guidelines are widely recognised and understood by the industry and are designed to engage both the development industry and local residents alike. In addition, because the BfL 12 principles are set out in a non-prescriptive way they can be successfully applied to all sizes of development and a wide range of development contexts. The HBF recommends the Council utilise this existing framework rather than attempt to derive further guidelines.

6. In using BfL12 it is important the Council does not place onerous requirements upon every development, for example suggesting every scheme must achieve diamond status. This would be impractical and may have viability implications. Rather BfL12 should be used as a tool to facilitate dialogue between the Council, communities and developers on design.

Housing Standards

7. The scoping report identifies that the SPD will '*provide clear guidance to homebuilders on the standards the Council requires for new homes in developments of all sizes*'. Whilst no further details are included it is important this does not place additional burdens upon development as this would be outside the role of an SPD and contrary to the government's housing standards review. It is noted that the existing 'New Housing Development SPG' includes a section upon energy efficiency. The Council will be aware that by the time this SPD is adopted energy efficiency will solely be a matter for the Building Regulations.

Density

8. Policy HC3 refers to minimum densities of 30dph across sites unless specific criteria are met. The SPD should make clear that this density is based upon the net developable area and provide guidance upon what the net developable area includes. In addition further elaboration upon the exception criteria within HC3 would be beneficial.

Flexibility

9. Given the variable nature of sites and locations across Sefton it is important that the SPD is not overly prescriptive and provides sufficient scope for applicants to reflect the characteristics of the site and its location as well as viability issues. In addition a more flexible approach will enable innovation.

Information

10. I trust that the Council find the foregoing useful in the preparation of the SPD and I 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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