



THE HOME BUILDERS FEDERATION

Planning Strategy,
Room 409,
Blackburn with Darwen Borough Council,
Town Hall,
Blackburn,
BB1 7DY
Email: forwardplanning@blackburn.gov.uk
Sent by Email only

Date: 29th June 2015

Dear Sir / Madam,

Blackburn with Darwen Local Plan (Part 2) Site Allocations and Development Management Policies – Schedule of Main Modifications

Thank you for consulting with the Home Builders Federation (HBF) on the Main Modifications consultation. The following comments should be read in conjunction with the HBF response form. The HBF has also submitted a separate paper upon the amendments to the Councils *'Housing Land Supply Position Paper'* these amendments were made after the close of the hearing sessions and therefore were not part of any debate.

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.

We would like to submit the following comments. **If required the HBF would also wish to attend any further hearing sessions to debate these matters further.**

Main Modification MM5, Page 39, paragraph 4.5

The HBF supports the proposed modification.

The amendments bring Part 2 of the Local Plan (LP2) into conformity with the Core Strategy. Given that the LP2 is intended to implement the requirements of the Core Strategy this is considered appropriate. Within our comments upon the publication version of LP2 and matter 2 examination hearing statement (question 2.3) we clearly set out that the HBF does not support a phased housing requirement. It is, however, noted that the proposed amendments bring

the phasing within LP2 back into conformity with adopted Core Strategy Policy CS6 and as such it is considered appropriate in this case.

Main Modification MM37, page 78, Policy 18 (5)

The HBF does not support the proposed modification which is considered unsound as it is not justified or consistent with national policy.

The amendments indicate that;

‘All residential development will be required to conform to any standards that the Council adopt with respect to internal and private outdoor space’.

The ministerial statement, 25th March 2015, identified that the Government are introducing a new national space standard. The PPG (ID 56-020-20150327) clearly indicates the introduction of the internal space should be justified and examined through a local plan and provides the relevant assessment criteria, including an impact upon viability and affordability test.

It is therefore clear that the Council cannot simply introduce any standard which it wishes to adopt. Likewise the introduction of the national space standard must be clearly and robustly evidenced and debated through a Local Plan examination. This has not been the case and the HBF does not consider that the Council can currently demonstrate a case for the introduction of the national space standard based upon the criteria included within the PPG. Indeed the viability of development and relative affordability are already compromised in much of Blackburn with Darwen it would therefore be contrary to the NPPF paragraphs 173 and 174 to include such an additional standard at this stage.

The HBF recommends that reference to space standards within Policy 18 be deleted.

Main Modification MM38, page 78, Policy 18 (additional sentence paragraph 4.12)

The HBF does not support the proposed modification which is considered unsound as it is not justified or consistent with national policy.

The additional sentence refers to the space standard policy discussed against MM37 above. The same issues with MM37 therefore also relate to MM38.

The HBF recommends that the additional sentence be deleted.

Main Modification MM53(c), Appendix 3, Monitoring Framework

The HBF does not support the proposed modification which is considered unsound as it is not justified, consistent with national policy or effective.

The proposed monitoring framework makes numerous references to Lifetime Homes, the Code for Sustainable Homes (e.g. Policy CS13), and Secured by Design (e.g. Policy CS20). The ministerial statement (25th March 15), and subsequent changes to the PPG make it clear that these standards are being wound down as part of the Government’s Housing Standards Review and

replaced by the Building Regulations plus optional standards. The PPG also makes clear that the introduction of any optional standard must be based upon clear evidence, of which criteria are set, and tested at a Local Plan examination.

To ensure the monitoring framework is not immediately out of date upon adoption it is recommended that reference to these standards are deleted.

Notification

Please notify the HBF of the publication of the Inspector's report, the adoption of the Core Strategy DPD or any future hearing sessions.

Yours sincerely,

MJ Good

Matthew Good
Planning Manager – Local Plans
Email: matthew.good@hbf.co.uk
Tel: 07972774229