



High Peak Borough Council
Planning Policy
Town Hall
Market Place
Buxton
Derbyshire
SK17 6EL

SENT BY E-MAIL AND POST

16 July 2015

Dear Sir / Madam

HIGH PEAK LOCAL PLAN – PROPOSED CHANGES CONSULTATION

Introduction

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. 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. We would like to submit the following comments and in due course attend the resumed Examination Hearing Sessions to discuss these matters in greater detail.

Objectively Assessed Housing Needs (OAHN)

Questions 4 – 8

The Update Report recommends an OAHN of between 310 to 350 dwellings per annum, which is a reduction from the previously stated OAHN of 420 – 470 dwellings per annum set out in the Housing Needs Study Final Report for High Peak Borough Council dated April 2014 by Nathaniel Lichfield & Partners (NLP).

As a consequence the Council is proposing a lower housing requirement of 350 dwellings per annum (7,000 dwellings for the plan period 2011 – 2031) reduced from 360 dwellings per annum in the submitted Local Plan. The submitted plan also made provision for an unmet need of 500 dwellings to be accommodated by the neighbouring authority of Cheshire East in its Local Plan. It is now proposed to delete this provision for unmet needs.

As stated in the NPPG (ID 2a-016-20150227) it is agreed that the starting point for OAHN is the 2012 household projections prepared by DCLG. For High Peak this starting point of household growth converted into houses using a 4.15% vacancy rate allowance is 296 dwellings per annum.

It is also agreed that because the 2012 household projections are only projections there is a built in deterioration of household formation rates (HFR) for younger age groups. Therefore it is appropriate to include a catch up of HFR as an adjustment to counter the inability of households to form and the growing number of concealed households. This adjustment increases the starting point from 296 to 315 dwellings per annum.

With regards to economic forecasts it is noted that 328 dwellings per annum is required for job stabilisation. An OAHN below this figure results in a decline in the working population and a decline in jobs contrary to the objectives of the Local Plan. Therefore a policy on jobs growth scenario (G) is recommended and its requisite OAHN figure of 352 dwellings per annum.

It is also agreed that an adjustment should be made for worsening market signals. However the extent of the adjustment is disputed. The Council's consultants NLP are proposing only 5%. As discussed during the Examination Hearing Sessions recent Local Plan Inspector's Reports for Eastleigh and Uttlesford respectively have suggested a 10% increase to OAHN as an appropriate response to worsening market signals. The NLP recommendation is even more surprising as in an up dated report on OAHN for Tamworth District Council written contemporaneously as the High Peak report NLP recommended an adjustment to HFR as well as a 10% uplift.

It is contended that the adjustment for market signals should be added onto the policy on jobs growth scenario. This adjustment increases 352 dwellings per annum to 369 (5%) – 387 (10%) dwellings per annum.

It is anticipated that the Council and its consultants may argue that the policy on jobs growth scenario and the catch up HFR plus a percentage increase for worsening market signals scenario are mutually exclusive assessments which ultimately achieve the same aims and the cumulative calculation above is a double count. However the OAHN of 310 – 350 dwellings per annum does not address the significant affordable housing need identified as between 878 (gross) – 526 (net) dwellings per annum. As stated in the NPPG an increase to the total housing figures included in the Local Plan should be considered where it could help deliver the required number of affordable homes. Moreover as identified in the Sustainability Appraisal a housing requirement above 350 dwellings per annum would achieve greater delivery of affordable housing as well as positive benefits such as improved health. The Council should be meeting as much of its affordable housing need as possible. Therefore an uplift over and above the policy on jobs growth scenario of 352 dwellings per annum would assist in moving towards meeting affordable housing needs and address other worsening market signals including rising house prices / rents, affordability and overcrowding. A housing requirement above 360 dwellings per annum would also boost housing supply. Therefore it

is suggested that the upper range of OAHN should be higher than 350 dwellings per annum.

The Council states that 350 dwellings per annum is the maximum housing requirement achievable within the parameters of paragraph 14 and 47 of the NPPF but the submitted Plan contains a housing requirement of 360 dwellings per annum. It is unacceptable for the Council to propose a reduced housing requirement especially given the substantial affordable housing needs. The Council's approach should be challenged. The fact that the Council's land supply may have decreased is not a justified reason for reducing the housing requirement as alternative land opportunities have been proposed to the Council.

Conclusions

For the High Peak Local Plan to be found sound under the four tests of soundness as defined by Paragraph 182 of the NPPF, the Plan must be positively prepared, justified, effective and compliant with national policy. The proposed reduction to the housing requirement in the submitted Local Plan from 360 dwellings per annum (7,200 dwellings between 2011 – 2031) to 350 dwellings per annum (7,000 dwellings between 2011 – 2031) is unsound. The Council's housing requirement is based on an overly pessimistic OAHN. There is no justification to reduce the housing requirement below the figure in the submitted Local Plan to do so is negative rather than positive planning which will not meet affordable housing needs nor boost the supply of housing as required by national policy. Therefore the Local Plan has not been positively prepared and properly justified so it will be ineffective. It is also non-compliant with the NPPF. It is recommended that the housing requirement is no less than 360 dwellings per annum but preferably it should be higher.

We trust that our comments will be helpful in informing the next stages of the High Peak Local Plan. In the meantime if the Council requires any further assistance or information please contact the undersigned.

Yours faithfully
for and on behalf of **HBF**



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