



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

SENT BY E-MAIL AND POST

28 January 2016

Dear Sir / Madam

## **HIGH PEAK LOCAL PLAN – MAIN MODIFICATIONS CONSULTATION**

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.

With reference to **MM3** for the reasons previously set out in our letter dated 16th July 2015 the HBF considers the housing requirement of 350 dwellings per annum is based on a low estimate of objectively assessed housing needs (OAHN). The housing requirement should be no less than 360 dwellings per annum as proposed in the submitted plan. Alternative OAHN prepared by other parties identify that housing needs may even be higher.

The deletion of the brownfield first approach to development under **MM59** is supported by HBF. The introduction of a review of Policy H1 to bring forward additional sites if necessary is also supported.

However the introduction of "the aim to meet optional higher standards for accessible and adaptable homes as well as the nationally described space standards" to Policy H4 in **M63** and **M64** are not supported because the Council has not provided reasoned justifications in accordance with the criteria set out in the NPPG (ID 56-020-20150327) for this proposal.

Moreover the HBF strongly disagrees with the proposal under **MM35** for the optional higher water efficiency standards in the sub market area of Buxton

subject to viability (**MM36**). The HBF's objections are set out in our letter dated 10 August 2015.

**M65** to Policy H5 Affordable Housing changes the wording to the 7<sup>th</sup> Bullet Point from "seek" to "want". It is not obvious if this change has been adequately viability tested by the Council. The Government is particularly keen to encourage small / medium sized builders to develop more houses therefore the Council should not be overly burdening small sized sites so that site by site negotiations become routine rather than occasional as such negotiations inevitably cause extra costs in terms of time delays and expenses.

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. It is the HBF's opinion that the Council's proposed main modifications do not pass these four tests of soundness.

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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