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02/08/2016

Dear Sir / Madam,

Sefton Local Plan: Modifications Consultation

Thank you for consulting the Home Builders Federation (HBF) on the proposed Main Modifications to the Sefton Local Plan.

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.

The HBF would like to submit the following comments upon the main modifications, these comments should be read in conjunction with our previous submissions upon the plan and examination hearing statements.

Main Modification M1, Paragraph 1.17

The HBF is supportive of the recognition of the need for an immediate review of the plan based upon the outcomes of the sub-regional studies. This accords with our previous comments upon this issue.

Main Modification M3: Paragraph 4.12

The HBF supports the increase in the housing requirement from 615dpa to 640dpa. Whilst this remains somewhat short of our assessment of need (at least 710dpa), based upon the Council's evidence (July 2015 *Review of the Objectively Assessed Need for Housing in Sefton* and November 2015 *Labour Supply Sensitivity Tests*) we are aware of the Inspector's Initial Findings in this regard. Our arguments in terms of the housing requirement are set out within our comments upon the publication version of the plan and our matter 3 hearing statement.

Main Modification M6: Paragraph 4.44

The HBF supports the commitment towards an immediate review dependent upon the findings of the regional *Strategic Housing and Employment Land Market Assessment* (SHELMA).

Main Modification M8: Figure 4.3

The HBF consider the proposed modification to be unsound as it will not be effective.

The proposed modification reduces the anticipated supply of dwellings for the whole area from the 11,793 identified within the submitted plan to 11,461. This is despite the increase in the housing requirement from 11,070 in the submitted plan to 11,520 (proposed modification M3).

Whilst the identified position may be a truer reflection of likely delivery from the sources identified in the plan it effectively means that the anticipated delivery will fall marginally short of the plan requirement, by 59 dwellings. Whilst the Inspector's comments at paragraph 12 of his Initial Findings are noted and windfalls and allocations may deliver more than anticipated the current evidence before the examination does not reflect this. To ensure that there are sufficient opportunities to meet the plan requirement the

HBF recommend a buffer over and above the requirement is identified. In common with the recent recommendations from the Local Plan Expert Group report to Government it is recommended that a 20% buffer be provided. This will not only provide flexibility and choice as required by the NPPF but will account for any under or none delivery from allocations, windfalls or permissions over the plan period.

As a minimum the HBF recommend that the delivery against the requirement is included as a further trigger for early plan review. The trigger should be based upon a failure to either meet the plan requirement for three years and / or a 10 to 20% deviation below the anticipated housing trajectory.

Main Modification M12: Policy MN1

The HBF supports the increased housing requirement but in common with our comments upon main modification M3 this is lower than we consider necessary. The inclusion of Part 5 of the policy is also supported, particularly the time limited nature of the review. In common with our comments upon main modification M8 it is recommended that the reasons for a partial or full plan review be expanded to include poor delivery against the local plan housing targets.

Main Modification M15: Paragraphs 6.14A to 6.14C

The HBF support the proposed additional paragraphs which add clarity to the review mechanism identified in the revisions to Policy MN1. In line with our previous comments it is recommended the review be expanded to failure to meet the housing target or trajectory set within the plan.

Main Modification M60: Policy HC2 & Main Modification M61: Paragraph 8.31

The proposed modification is considered unsound as it has not been justified by evidence.

The deletion of Lifetime Homes from part 2 of the policy is supported. However its replacement by the optional Building Regulations M4(2) is unjustified.

The PPG (paragraph 56-007) identifies which criteria must be considered through the examination process to enable the introduction of the optional standards. In terms of M4(2) the criteria are;

- the likely future need for housing for older and disabled people (including wheelchair user dwellings).
- size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).
- the accessibility and adaptability of existing housing stock.
- how needs vary across different housing tenures.
- the overall impact on viability.

Whilst the SHMA (examination ref: HO5) provides some of this information significant elements are missing or do not support the introduction of the optional standard. Specifically the viability evidence (examination ref: MI2) does not consider the costs of implementing such a requirement, nor does it provide any comfort that such requirements would be viable.

The HBF therefore does not consider that the Council can currently justify the introduction of the optional standard. If this can be evidenced and justified at a later date it could be included as part of the early review of the plan. It is therefore recommended that part 2 of the policy and paragraph 8.31 be deleted.

Information

The HBF would like to be involved in further hearing sessions if considered relevant and necessary.

We would also like to be informed of the following;

- Publication of the inspectors' recommendations
- Adoption of the Local Plan

Yours sincerely,

MJ Good

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