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Dear Carmel,

Sefton Local Plan: DCLG 2014-based household projections

Thank you for consulting the Home Builders Federation (HBF) on the Inspector's note on the recent release of the 2014-based household projections.

The HBF agrees that whilst the 2014-based household projections are more up to date than the 2012 projections, upon which the plan housing requirement is based, this does not automatically render the housing requirement out of date. Indeed, as noted by the Inspector, the PPG confirms this point (ID 2a-016). The HBF is also mindful that further modifications will simply delay plan adoption and consequently slow down the release of much needed housing allocations. This would not only impact upon short-term housing delivery in Sefton but also run counter to the Government's expectation that all Councils should have an adopted Local Plan in place as soon as possible.

It is noted that the 2014 based projections are lower than their 2012 counterparts (average 536dpa to 576dpa over the plan period). Given the marginal nature of the difference it is not considered sufficient to warrant a reconsideration of the housing requirement. In this regard it must be noted that whilst the projections are the starting point they do not necessarily represent the end point for determining an objectively assessed housing need (PPG 2a-017). As such although lower it does not necessarily mean that the end result would change.

Within our representations upon the submitted Sefton Local Plan and examination hearing statements we considered that the objectively assessed needs of the area were greater than the proposed plan average of 640dpa. The HBF would therefore have strong objection to any reduction within the housing requirement for the Sefton Local Plan. It is also worth noting that the Council is committed to a number of regional studies including a Strategic Housing and Employment Land Market Assessment. If this study were to identify a significantly different housing need this would trigger an immediate full or partial review of the plan. Thus providing further safeguards that the updated position will be considered in due course.

In conclusion, due to the reasons provided above, I can confirm that the HBF agrees with the Inspector and do not consider that the new projections warrant further modifications and delay to the plan.

Yours sincerely,



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