

Keppie Massie



SENT BY EMAIL
bwdlp@keppiemassie.com
17/08/2021

Dear Keppie Massie,

BLACKBURN WITH DARWEN LOCAL PLAN VIABILITY ASSESSMENT

1. Thank you for consulting with the Home Builders Federation (HBF) on the Blackburn with Darwen Local Plan Viability Assessment Methodology and Assumptions consultation document..
2. 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.
3. The HBF has completed the relevant questions from the response form provided, this can be found below.

Future Engagement

4. I trust that the Council and Keppie Massie will find these comments useful as the continue to progress their Local Plan and Viability Assessment. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
5. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Joanne Harding', written in a cursive style.

Joanne Harding
Planning Manager – Local Plan (North)
Email: joanne.harding@hbf.co.uk
Phone: 07972 774 229

**BLACKBURN WITH DARWEN LOCAL PLAN VIABILITY ASSESSMENT
CONSULTATION:**

RESPONSES FORM

Questions & Feedback:

(1a) Do you consider that any changes are required to the residual methodology that is proposed?

(1b) If so, what are these changes and why do you believe that they are necessary?

BLACKBURN WITH DARWEN LOCAL PLAN VIABILITY ASSESSMENT CONSULTATION:

RESPONSES FORM

Questions & Feedback:

(2a) What are your views about the generic housing typologies being tested?

The HBF considers that it would be more appropriate for the secondary housing sites to be considered at a density of 30dph, which is likely to be more reflective of the character of the existing settlement areas.

The HBF also considers that the 45dph density proposed to be used may also need further consideration, as again it is likely that any development in these areas may need to give consideration to the local character.

(2b) Is the sample sufficiently broad and representative?

(2c) If you believe further site testing is required, what form should this take and why do you believe it is appropriate?

The HBF considers that it would be appropriate to consider lower density developments for both the secondary and tertiary sites.

BLACKBURN WITH DARWEN LOCAL PLAN VIABILITY ASSESSMENT CONSULTATION:

RESPONSES FORM

Questions & Feedback:

(3a) In relation to the generic development typologies being tested do you consider any adjustments are required to the gross to net site area ratios and if so why?

(3b) Do you have any comments regarding the overall dwelling mix and assumed house size?

The HBF is concerned that whilst the 1 and 2 bed dwellings are assumed to be built to the largest NDSS spec size, the 3 and 4 bed homes are not with 93sqm being used rather than 108sqm for the 3 bed, and 120 sqm rather than 130sqm. This use of smaller homes sizes could have implications for the viability for development.

The HBF considers that the housing mix should ensure that it is reflective of the policies proposed by the Council, and allows for the density proposed.

(3c) Do you feel that any variation is required and, if so, what variation and why?

The HBF considers that it would be more appropriate to use the larger NDSS sizes to prevent viability issues restricting the size of homes that can be provided.

**BLACKBURN WITH DARWEN LOCAL PLAN VIABILITY ASSESSMENT
CONSULTATION:**

RESPONSES FORM

**BLACKBURN WITH DARWEN LOCAL PLAN VIABILITY ASSESSMENT
CONSULTATION:**

RESPONSES FORM

Questions & Feedback:

(4a) What are your views about the commercial typologies being tested?

N/A

(4b) In your view is any further testing of employment uses required and, if so, why?

N/A

BLACKBURN WITH DARWEN LOCAL PLAN VIABILITY ASSESSMENT CONSULTATION:

RESPONSES FORM

Questions & Feedback:

(5a) Having regard to appropriate guidance on the matter of 'benchmark land values' do you believe that any variations are required to the figures proposed?

The HBF is concerned by the low land values proposed, and consider that it may be appropriate for the Council to ensure that a reasonable landowner would actually be willing to sell at these values.

(5b) If so, what are these changes and why do you believe them to be appropriate?

(5c) Please provide evidence to support your suggested changes.

The HBF is not a landowner, purchaser or developer. However, we would strongly recommend that the Council seeks further evidence to ensure that these land values are appropriate, as they currently appear particularly low.

These low values may also impact on any exceptional circumstances leaving no opportunity to reduce the land values further.

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CONSULTATION:**

RESPONSES FORM

Questions & Feedback:

(6a) Is there any other information regarding values that you believe we need to consider, if so, what is this?

(6b) Do you feel that any variations are required to the range of residential values that we have adopted?

(6c) If so, what are these and why?

**BLACKBURN WITH DARWEN LOCAL PLAN VIABILITY ASSESSMENT
CONSULTATION:**

RESPONSES FORM

Questions & Feedback:

(7a) Do you have any observations regarding the construction cost methodology?

(7b) If you believe any adjustments are required, what are these and why do you consider they are necessary? Please provide evidence.

BLACKBURN WITH DARWEN LOCAL PLAN VIABILITY ASSESSMENT CONSULTATION:

RESPONSES FORM

Questions & Feedback:

(8a) Do you have any observations regarding the developers profit assumptions?

The Council will need to reconsider the developers profit for affordable housing particularly in relation to First Homes, as it is likely that the risk for delivering these homes will lie with the developer rather than with a registered provider. As such the HBF considers that the developers profit should be reviewed and in relation to affordable housing will need to be increased.

(8b) If you believe any adjustments are required, what are these and why do you consider they are necessary?

As above.

**BLACKBURN WITH DARWEN LOCAL PLAN VIABILITY ASSESSMENT
CONSULTATION:**

RESPONSES FORM

Questions & Feedback:

(9a) What are your views on the other appraisal assumptions that we propose to adopt?

(9b) In your view are adjustments required to any of the inputs and, if so, why is this? Please provide evidence.

**BLACKBURN WITH DARWEN LOCAL PLAN VIABILITY ASSESSMENT
CONSULTATION:**

RESPONSES FORM

Questions & Feedback:

(10a) What are your views on the appraisal assumptions that we propose to adopt?

(10b) In your view are adjustments required to any of the inputs and, if so, why is this? Please provide evidence.

BLACKBURN WITH DARWEN LOCAL PLAN VIABILITY ASSESSMENT CONSULTATION:

RESPONSES FORM

Questions & Feedback:

(11a) Do you have any comments/observations about our approach to considering the impact of the various Development Management Policies listed?

The Council may want to consider the implications of potential national policies in relation to accessible dwellings and EV Charging, as well as the Future Homes Standard and Biodiversity Net Gain as these are likely to have implications for viability of development going forward.

(11b) Do you think any adjustments to the approach and/or costs are required and, if so, why?

As above.

(11c) Do you think we have identified all policies that have an impact on viability? If not what other policies need to be considered and why?