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SENT BY EMAIL

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22/08/21

23/08/2021

Dear Planning Policy Team,

LIVERPOOL LOCAL PLAN: MAIN MODIFICATIONS

1. Thank you for consulting with the Home Builders Federation (HBF) on the Liverpool Local Plan Main Modifications.
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.

MM3 – Policy STP2

3. The HBF generally supports the deletion of part a of this policy which stated that new development '*as a first priority, be located on previously developed land*'. Whilst the HBF considers that the re-use of previously developed land is generally a positive way to contribute to sustainability, it should not limit the development of other sustainable sites. The HBF also considers that it is important that the prioritisation of previously developed land does not compromise the delivery of housing to meet local needs.

MM6 – Policy STP4 Infrastructure Provision

4. The HBF generally supports the deletion of 'primarily be located on previously developed land'.

MM33 – Policy H1 Housing Requirement

5. The HBF generally supports the Council amending the policy to state 'at least 34,780 net additional dwellings . . . equates to 1,739 or more dwellings per year'.

MM41 – Policy H12 Accessible Housing

6. This policy is proposed to be amended to state in Part 2 that '*to achieve this all new housing development must comply with Building Regulations Part M4(2) accessible and adaptable dwellings or any subsequent update, as a minimum standard*'. It goes on to state in Part 3 that '*the City Council will also apply Part M4(3)(2a) of the Building*



Regulations to 10% of all new homes in a development'. Part 4 of the policy now states that *'where the dwelling is to provide accommodation for a known wheelchair user the dwellings should be designed to meet the needs of occupants who use wheelchairs in accordance with Part M4(3) (2b) wheelchair accessible dwellings of Building Regulations'*. The HBF does not consider that these proposed amendments are sound, and does not consider that they have been justified and does not consider that they are consistent with national policy.

7. Whilst the HBF is generally supportive of providing housing for specialist needs, as has been set out through each of our responses the HBF does not consider that the evidential threshold has been met to introduce the optional technical standards. Evidence of an ageing population or those with a disability does not in itself justify the requirements of this policy, without appropriate evidence the HBF would not support the introduction of this policy. In summary, the HBF does not consider that the future need identified in Liverpool is sufficient to require the standard; it does not provide sufficient evidence to determine that there is a need for all house types or locations to provide for the M4(2) standard, it does not provide any evidence in relation to the accessibility and adaptability of stock in Liverpool; and it is not evident that the requirement is viable for all homes and locations.
8. If the policy is to be retain the HBF considers that the amendments to part 2 and 3 have improved the clarity of the policy. However, Part 4 is still unclear, and it is not apparent as to when this would be applied.
9. The HBF considers that the inclusion of Part 5 of the policy in relation to the consideration of site-specific factors is an improvement to the policy. However, there are further text should be included in relation to where step-free access is not viable, and in which case neither of the Optional Requirements in Part M should be applied.

Future Engagement

10. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
11. 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,



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