

Fylde Council,
Planning Policy Team,

SENT BY EMAIL
planningpolicy@fylde.gov.uk
22/03/2018

Dear Sir / Madam,

FYLDE LOCAL PLAN: SCHEDULE OF PROPOSED MAIN MODIFICATIONS

Thank you for consulting with the Home Builders Federation on the Fylde Local Plan Proposed Main Modifications.

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.

The Council will be aware that the HBF provided comments upon previous iterations of the Local Plan, the following comments are provided in light of the points previously provided.

MM6 - Policy DLF1

Modification MM6 is an improvement and sees the housing requirement increased to 8,715. However, the housing requirement remains below level recommended by HBF. The policy wording would still benefit from clarity in relation to whether this is a net or gross housing figure, with the HBF recommending that it should be a net figure.

MM29 & MM30 - Policy GD7 and Justification

The HBF supports the deletion of reference to the National Technical Standards. However, the HBF would continue to recommend the deletion of part (r) in relation to climate change.

MM40 - Policy H1

Modification MM40 is an improvement and sees the housing requirement increased to 415 net homes per annum. However, the housing requirement remains below level recommended by HBF.

The HBF does not support the insertion of '*calculated using the 'Liverpool' method*'. The use of the Liverpool method is not supported, and the HBF considers that this amendment to the policy should be deleted.

MM42 & MM43 - Policy H2 and paragraph 10.25

The HBF consider that the insertion of 'normally', helps to increase flexibility in relation to a minimum net density of 30 homes per hectare. Further text in relation to residential densities and the potential for lower net residential densities to reflect and enhance the local character of the area is generally welcomed.

Monitoring Framework

The HBF is generally supportive of the addition of 'Trigger for Action' and 'Contingency / Action' columns. However, it is considered that the actions identified would benefit from being more definitive and pro-active.

Future Engagement

I trust that the Council will find these comments useful as it continues to progress its Local Plan. Please notify the HBF of the publication of the Inspector's report, the adoption of the Local Plan or any future hearing sessions. Please use the contact details provided below for future correspondence.

Yours sincerely,



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