

Regeneration and Planning Policy
Burnley Borough Council
19 Parker Lane
Burnley
BB11 2BY

SENT BY EMAIL
localplan@burnley.gov.uk

27/04/2018

Dear Sir / Madam,

BURNLEY LOCAL PLAN: MAIN MODIFICATIONS CONSULTATION

Thank you for consulting with the Home Builders Federation on the Burnley Main Modifications consultation

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.

MM1 – Policy SP2: Housing Requirement 2012-2032

The HBF supports the amendment to the text to 'a minimum of' it is consider this is in line with the NPPF requirements for plans to be positively prepared and boost significantly the supply of housing.

The HBF continues to consider that the housing requirement should be higher than both the 194 now proposed and the 209 per annum originally proposed.

MM8 – Policy HS2: Affordable Housing Provision

As set out in our previous submissions the HBF does recognise that there is a need for affordable housing in Burnley. However, we continue to have concerns in relation to this policy. Without a specific target for delivery there is little certainty for a developer to assess the investment potential of a site, which may have an impact on the deliverability of sites. The viability evidence continues to highlight the issues with viability of development in the area, and the Council may need to be more accepting that very little affordable housing will be delivered, particularly in light of other policy requirements. As such the HBF continue to consider that the Council should delete

the affordable housing requirement or provide an appropriate target based on suitable viability evidence.

MM9 – Policy HS3: Housing Density and Mix

The HBF are generally supportive of the proposed amendments to Policy HS3, particularly the recognition of the marketability of the dwellings that will be provided.

Future Engagement

I trust that the Council and the Inspector will find these comments useful as they continue to progress the Local Plan to adoption. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

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 'J Harding', with a stylized flourish at the end.

Joanne Harding

Local Plans Manager – North

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