

Development Plans Team
Liverpool City Council
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SENT BY EMAIL
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Dear Sir / Madam,

LIVERPOOL LOCAL PLAN ADDITIONAL AND REVISED EVIDENCE BASE

1. Thank you for consulting with the Home Builders Federation on the Liverpool Local Plan Additional and Revised Evidence Base Publication consultation.
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.

Viability Assessment

3. As set out in our previous response the HBF have concerns about the late point at which the viability assessment has been undertaken and at which the consultation has been undertaken. It is not clear how the Council can have been confident they were submitting a 'sound' document without the appropriate viability information to support a number of policies or the cumulative impact of the Plan. Particularly where national planning policy guidance and the national planning policy framework require viability to be part of the assessment of the policy e.g. affordable housing or the optional housing standards.
4. As set out in our previous response the HBF have concerns in relation to the viability of a number of policies within the Plan, these concerns appear to have been borne out by the Viability Assessment which highlights that there are a number of allocations, zones and house types which are not viable within the area. From the evidence within the Assessment it would appear that only development within Zone 4 is capable of supporting the cumulative

requirements of the Local Plan and even then given the impacts small changes in assumption can have on viability, this may be subject to change.

5. Paragraph 7.36 of the assessment states that *'our viability testing demonstrates that in relation to new housing development not all parts of the City will be able to support the cumulative plan policies'*, it also states that a test of viability will ensure that there is sufficient flexibility to allow development to come forward where viability may be an issue. Whilst the HBF consider that clause allowing for flexibility where viability is an issue is useful, the HBF do not consider that it should be utilised to justify a policy that is generally not viable and will require a significant number of developments to produce Viability Assessments.
6. Outwith of our concerns in relation to the viability of the policies, the HBF also have some concerns in relation to the methodology and assumptions made within the Viability Assessment and would like clarity in relation to how much involvement the housebuilding industry has had in the production of the assessment.

Strategic Housing Land Availability Assessment (SHLAA)

7. It would appear that the SHLAA has been based on the NPPF (2012), given the change in definition of 'deliverability' in the NPPF (2018) this appears a significant oversight. Particularly in relation to the consideration of the deliverability of sites with outline permission or major development, where under the new definition of 'deliverable' the HBF would expect the Council to have collated clear evidence that housing completions will begin on site within five years.
8. NPPF (2018) states that *'Sites that are not major development¹, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years'*.
9. Whilst the Local Plan will be tested based on the NPPF (2012), in reality as soon as the document is adopted it will be used alongside the NPPF (2018), which will set a much higher bar.
10. The HBF consider the more detailed description of what the Council are considering as windfall development is a useful improvement over the previous draft version of the document. However, it is not clear why this definition means it is appropriate to include windfalls from Year 1. The HBF would recommend

¹ Defined in the NPPF (2018) as *'development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more'*.

that if a windfall allowance is considered appropriate it is only included after year 3 to avoid double counting of development.

11. The HBF support the use of a lapse rate to reflect that no all planning permissions will come forward or will not come forward at the level previously assumed or to the timescales previously assumed.

Future Engagement

I trust that the Council will find these comments useful. 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 the progress of the document. Please use the contact details provided below for future correspondence.

Yours sincerely,



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