

Sent by email to:

11/12/2018

Dear Sir/ Madam

Response by the House Builders Federation to Plan:MK Main Modifications

Thank you for consulting the Home Builders Federation (HBF) on the publication of Local Plan for Milton Keynes. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

MM2 and MM3

Whilst the commitment in policy to an early plan review is welcomed, we still consider the plan period to inconsistent with Government policy. In our experience plan reviews are rarely delivered as set out in local plans. The only correct approach to addressing our concerns regarding the plan period is for it to be extended and additional allocations made to support the housing needs across the full plan period.

MM7

We support the statement being made in this modification that the Council will assess housing delivery using the Sedgefield methodology and ensure that any backlog arising will be addressed within 5 years. We also support the use of the 20% buffer at this stage, recognising that this will in future be considered through the housing delivery test.

MM24

We support the amendment made to HN2.

MM25

We do not consider the proposed amendment to be sound as it is a requirement to provide rather than an approach that seeks agreement between the land owner and Council. As we set out in our representations PPG outlines that such provision should be though agreement not through requirement. It is also unclear whether this amendment has been tested as part of the Council's viability study. However, if the



inspector considers such a modification to be appropriate, we would suggest that this be included with the caveat of the provision being viable.

MM38

We strongly disagree with the inclusion of policy D4 in the Local Plan. There is no basis in policy or guidance for requiring a specific proportion of new homes to be built using modern methods of construction. How a house builder decides to build out its homes should not be controlled through the planning system. What seems to be misunderstood by the Council in relation to this is that many house builders are already changing the way that they build houses to improve efficiencies. Such changes include increasing the amount of offsite construction to speed up the construction process. It is not possible to consider all the improvements that are being made and as such the policy cannot be considered an effective approach in achieving improvements in the delivery of homes

The policy is also inconsistent with national policy as it:

- seeks to impose methods of construction outside of the technical optional standards set out in PPG.
- Is not clear as to how the decision maker should react. As outlined above home builders are increasing using new methods to create efficiencies in the delivery of new housing and it is not clear whether this policy would recognise these efficiencies.

Our members understand the market for housing and what their customers want. If there is demand for modular construction and innovative design, then this will be delivered through the market not through planning policy. The policy should be deleted.

We hope these representations are of assistance in taking the plan forward to the next stage of plan preparation and examination. Should you require any further clarification on the issues raised in this representation please contact me.

Yours faithfully



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