

Planning Policy
Cheshire West and Chester Council
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Ellesmere Port
CH65 0BE

SENT BY EMAIL
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05/03/2019

Dear Sir / Madam,

CHESHIRE WEST AND CHESTER LOCAL PLAN (PART 2): LAND ALLOCATIONS AND DETAILED POLICIES MAIN MODIFICATIONS

Thank you for consulting with the Home Builders Federation on the Cheshire West and Chester Local Plan (Part 2) Land Allocations and Detailed Policies 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 HBF are pleased to see that the Council are now close to the completion of their Local Plan and we would like to submit the following representations in response to the Council's proposed main modifications.

MM54 - DM20

The HBF support the deletion of the second paragraph of the policy.

The HBF object to the proposed amendment to criterion 2 of the policy. The HBF do not consider that the Council can provide the evidence to support this policy and do not consider that the addition of the words adaptable and accessible homes is appropriate as the policy is currently worded.

The HBF support the deletion of text in relation to the M4(2) and M4(3) standards in paragraph 12.15. However, the HBF do not support the additional text proposed which still looks for developers to provide M4(2) and M4(3) homes.

The PPG is clear that where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to requirement M4(2) and / or M4(3) of the optional requirements in the Building Regulations (ID 56-008). It is also clear that the optional standards can only be introduced in a Local Plan where there is appropriate evidence. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. As was identified at the Examination the Council do not have the evidence to support this policy.

Therefore, the HBF do not consider that the proposed wording is appropriate. The HBF consider that the Council could potentially include wording to support developers providing homes to these standards if they chose to do so, but they cannot include a policy requiring this type of development, as they do not have the evidence to do so.

Future Engagement

I trust that the Council and the Inspector will find these comments useful as they continues to progress the Local Plan. 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,



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