

Planning Policy
Hyndburn Borough Council
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SENT BY EMAIL
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08/04/19

Dear Sir / Madam,

HYNDBURN LOCAL PLAN: CORE STRATEGY REVIEW (Reg 18)

Thank you for consulting with the Home Builders Federation on the Core Strategy Review and Site Allocations DPDs Consultation (Regulation 18).

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.

These comments build on previous comments provided to the Issues and Options consultation from April 2018 and will hopefully prove useful in taking your plan forward.

Vision and Objectives

The HBF support the recognition for a good choice of homes within Hyndburn and the role it can play in creating a sustainable, healthy and great place. The HBF also generally support the objectives of the plan, but in particular Objective 2 in looking to provide for a greater choice and quality of housing.

Policy CS1: The Spatial Development Strategy

The HBF consider that part 3 of the policy could take a more positive tone, rather than providing 'sufficient' land. An amendment that looks to 'Increase the supply of land within the Borough to meet the identified needs for employment, retail and housing', would be an improvement, this would better reflect the NPPF requirements for plans to be 'positively prepared' and to 'boost significantly' housing supply.

The HBF also has concerns in relation to the priority to be given to developing brownfield land within the urban areas first. Whilst the HBF consider that the re-use of previously developed land is generally a positive way to contribute to sustainability, it should not limit the development of other sustainable sites. The HBF also considers that it is important that the prioritisation of previously developed land does not compromise the delivery of housing to meet local needs.

The NPPF (paragraph 117) refers to promoting rather than prioritising the effective use of previously developed land. It is therefore recommended that the policy text be amended to refer to sustainable sites, or if reference to brownfield land is to be retained that 'Priority' is replaced with 'Support'.

Policy CS9: Housing Provision

This policy states that over the plan period the Council will make provision for at least 4,320 dwellings (equivalent to an average of 216 dwellings each year). The HBF support the Council in deciding to utilise a housing requirement over and above the level proposed by the CLG Standard Methodology. The HBF note that the housing requirement is the same as the housing need set out in the GL Hearn Housing and Economic Need Assessment (HENA) 2018.

It is noted however, that the housing requirement is below the medium housing growth option set out in the previous consultation and which was considered to be the most beneficial in terms of sustainability. It is therefore considered that there may be scope for an increase in the housing requirement.

The HBF support part 2 of the policy which seeks to maintain a rolling five year supply of specific deliverable sites throughout the plan period.

The HBF do not consider that the first sentence of part 3, which seeks '*to maximise the opportunities for the delivery of affordable housing*' is necessary, it is an aspiration rather than a policy and could be interpreted to be more onerous than the remainder of part 3 of the policy. The HBF does however, consider that the reference to viability should be retained and this should be incorporated within the requirements set out in the second sentence. In general, the HBF supports the need to address the affordable housing requirements of the borough, however, it must be determined that any requirements are viable, and homes will still be delivered. The NPPF is, clear that the derivation of affordable housing policies must not only take account of need but also viability. Paragraph 34 of the NPPF (2019) established the importance of viability to ensure that development identified in the Plan should not be subject to such scale of obligations and policy burden that their ability to be delivered might be threatened.

The HBF supports the efficient use of land and understands the inclusion of a density policy. The HBF consider that this part of the policy would benefit from an element of flexibility allowing developers to take into account local and site characteristics, market aspirations and viability in determining the appropriate density of the site. The following text could be added '*Densities below those set out above may be considered appropriate where local variations in housing need, local characteristics,*

site-specific circumstances or scheme viability indicate a different density is required in order to achieve local plan objectives’.

Policy CS10: Suitable Range of Housing

The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to: overly prescriptive requirements; requiring a mix that does not consider the scale of the site; or the need to provide additional evidence. The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location.

It is not clear if part 1(b)(iii) of this policy is an aim, as set out in the final sentence of part 1 or a requirement. It is recommended that the Council consider the format of the policy and seek to improve the clarity.

The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG. 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. It is incumbent on the Council to provide a local assessment evidencing the specific case for Hyndburn which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy. The HENA 2018 does provide some limited evidence in relation to the likely future need for housing for older people and disabled people it provides limited information in relation to the size, location, type or quality of dwellings needs and no evidence in relation to the accessibility and adaptability of the existing housing. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommend that an appropriate transition period is included within the policy.

It should also be noted that the PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances; and that policies for wheelchair accessible homes should only be applied to dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.

Implementation and Monitoring

The HBF would expect the Local Plan to contain a monitoring framework with appropriate targets and triggers and appropriate remedial actions which would be taken if the targets or triggers are not met. In terms of housing such triggers for action could include the lack of a five-year supply or delivery which is below the anticipated housing trajectory, potential actions could include working with

developers, producing masterplans, allocating further sites, reducing Local Plan requirements or preparing a new Local Plan.

Future Engagement

I trust that the Council will find these comments useful as it continues to progress its 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,

A handwritten signature in cursive script, appearing to read 'J Harding', written in dark ink.

Joanne Harding

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