



THE HOME BUILDERS FEDERATION

Date: 19th March 2015

Consultee ID: 755915

Matter: 6

PENDLE CORE STRATEGY PLAN EXAMINATION

MATTER 6: HOUSING NEEDS

Question 1: Is the affordable housing target of 40% appropriate having regard to the evidence base of housing need?

1. The 40% target is identified within the SHMA based upon the significant need for affordable housing across Pendle. Whilst the HBF supports the need to deliver affordable housing such a requirement is clearly unviable within Pendle. This is demonstrated by the Council's viability evidence (ref: CD/07/01) and reflected in the current policy targets.
2. It is recognised that affordable housing contributions can be achieved by other mechanisms including rural exception sites and through funding. The HBF is unaware of the scale of such opportunities within Pendle but it seems unlikely they will be sufficient to plug the gap. To increase the amount of affordable housing provided the Council should consider increasing the overall housing requirement.

Question 2: Is the affordable housing target realistic and deliverable having regard to the doubts over the viability of the % of affordable housing provision that can be delivered and the area based affordable housing targets within Policy LIV4?

3. No, I refer the Inspector to our comments upon questions 1 and 3 of this hearing statement and our comments upon the Pre-submission Core Strategy.

Question 3: Are the size threshold and area based affordable housing targets in Table LIV4a justified and deliverable? Should affordable housing contributions be sought on a greater range of housing developments e.g. green field sites in the M65 corridor?

4. The threshold of five units within Rural Pendle is contrary to the Government policy set out within the Ministerial Statement dated 28th November 2014. This statement introduced a national affordable housing threshold of 10 units or development in excess of 1,000m² gross internal floorspace. Within designated rural areas, including national parks, areas of outstanding natural beauty and areas designated by the Secretary of State as being rural a lower 5 unit threshold can be applied. The HBF is not aware that this applies to the areas of Bradford where a 5 unit threshold is

prescribed. It is noted that the proposed main modifications MM008 amends table LIV4a to account for these changes. The HBF supports this change.

5. In terms of the targets the HBF supports a variable target based upon the variance of viability across the plan area. It is, however, worth noting that our concerns relating to the upper limits of 30% within Rural Pendle, discussed within our comments upon the Pre-submission plan, remain.
6. Proposed main modification MM09 identifies that the AMR will be used to update affordable housing targets where appropriate. The HBF contends that such an approach is entirely unjustified and contrary to national guidance. The NPPF, paragraph 174, clearly states;

‘Local planning authorities should set out their policy on local standards in the Local Plan, including requirements for affordable housing.....’

7. The recent Inspectors interim views and final report upon the Leeds Core Strategy concur with our opinion. Furthermore the amendment of targets through the AMR will not provide any certainty to developers seeking to make investment decisions nor will they be rigorously challenged through a local plan examination.
8. The HBF do not support contributions being made from green field sites within the M65 corridor as it is not considered that this is supported by the evidence. In order to boost affordable housing delivery the Council may, however, wish to consider alternative methods of delivery such as the Government’s proposed ‘Starter Home Initiative’.

Question 4: How is the size threshold for Rural Pendle affected by the recent change to the Government’s Planning Practice Guidance (PPG)?

9. See our response to question 3 above.

Question 5: How are different mechanisms expected to contribute to the target e.g. obligations on market housing sites, sites developed by social housing providers, exception sites, commuted sums, empty homes back into use, regeneration areas?

10. The HBF considers this is a matter for the Council to address.

Question 6: Is the requirement to retest viability if development does not start in 2 years within Policy LIV4 justified?

11. This requirement appears unduly onerous upon the developer, particularly when it is considered that it can often take two years for developments to commence on site for a whole host of reasons, including the need to discharge conditions and undertake preliminary assessments. The HBF consider a more appropriate time to reassess viability would be at the time of renewal of a planning application.

Question 7: Is the tenure split proposed by Policy LIV4 justified? Should ‘open market discounted housing’ be considered as an option?

12. Yes, the HBF considers that open market discounted housing should be included as an option. The inclusion of such tenures can, in some instances, enable affordable housing to be provided in cases where issues of economic viability are present.

Question 8: Does Policy LIV4 provide sufficient clarity as to when rural exception sites will be acceptable?

13. The HBF has no further comments at this stage.

Question 9: Is the guide to the property types and sizes within Tables LIV5a and LIV5b justified by the existing supply of small terraced houses, the requirement for lower density in some areas and the objective of higher value/aspirational housing?

14. It is noted that the policy identifies that Tables LIV5a and LIV5b are provided for indicative purposes only. The HBF recommends that they are retained as such and are not considered mandatory requirements for each site as this would inevitably impact upon the deliverability of sites and the ability of a developer to respond to the market needs of a particular area.

Questions 10 & 11

15. The HBF has no further comments at this stage.

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