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30/04/2026

Dear Sir/ Madam

Hyndburn Local Plan (Strategic Policies and Site Allocations): Main Modifications Consultation

1. Thank you for consulting with the Home Builders Federation (HBF) on the Hyndburn Local Plan (Strategic Policies and Site Allocations) Main Modifications.
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.
3. We set out our comments on the Main Modifications below.

MM19 – Policy SP3: Planning Obligations (Part 1)

4. The HBF agrees with the change made in MM19 which references the tests for planning conditions and planning obligations outlined in the National Planning Policy Framework (NPPF). Nevertheless, for clarity, for planning obligations the Local Plan also should reference that these tests have statutory weight in the form of Regulation 122(2) of the Community Infrastructure Levy Regulations 2010.

MM20 – Policy SP3: Planning Obligations (Part 3)

5. The HBF supports the deletion of the text identified in MM20, as outlined in our representations made at the Regulation 19 stage, the text lacked clarity and certainty for developers and so required removing.

MM35 – Policy SP10: Housing Provision (including affordable housing) (Part 2)

6. Amending Policy SP10 through MM35 is supported by the HBF. We have consistently outlined our concerns regarding the marginal viability of housing development in Hyndburn and so amending the affordable housing requirement on brownfield sites to 10% is a pragmatic move which is welcomed.
7. However, the HBF would go further in this regard and remove the requirement for First Homes contained in Part 2 of Policy SP10. The reason for this is that any development proposed in the Borough will need to have regard to the latest NPPF, which makes clear that First Homes is no longer a mandatory requirement. This will further assist in the deliverability of new homes in the area.

MM35a – Policy SP10: Housing Provision (including affordable housing) (Part 3 and new paragraph 6.10)

8. For the reasons outlined in our response to MM35 above, we agree with the changes proposed through MM35a given the viability challenges in delivering housing for older people.

MM43 – Policy SP13: Climate Change and Sustainable Development (Part A)

9. The HBF supports the deletion of this part of Policy SP13. As has been outlined in our previous representations, the move towards greater energy efficiency should be via a nationally consistent set of standards and timetable, which is universally understood and technically implementable. This is consistent with the Written Ministerial Statement of 13 December 2023 (Reference: UIN HCWS123) and the emerging revised NPPF (draft Policy PM13) which is expected to be published later this year.
10. In this regard, as the Future Homes Standard has now been published (subject to an implementation period running until March 2028), then the relevant policy and supporting text should be updated accordingly.

MM48 – Policy SP16: Natural Environment Enhancement (Part 1c)

11. The proposed change in MM48 is supported by the HBF. The Planning Practice Guidance (PPG) makes clear that plan-makers do not need to include policies which duplicate the detailed provisions of the Biodiversity Net Gain (BNG) statutory framework (Reference ID: 74-006-20240214). MM48 avoids this duplication and so now complies with national policy.

MM51 – Policy SP16: Natural Environment Enhancement (Paragraph 7.42 and new paragraph 7.43)

12. MM51 updates the supporting text to Policy SP16 so as to reflect the statutory framework for BNG. This is broadly supported by the HBF in order to ensure that this part of the Local Plan is consistent with national policy.
13. The paragraph added (7.43) explains the notion of the BNG sequential approach. The HBF suggests that given that this forms part of the statutory framework anyway, its inclusion within the supporting text to Policy SP16 is not necessary. However, if the Inspector determines that it should remain, then reference should also be made to how the sequential approach relates to the spatial risk multiplier, so that it is clear to applicants that the value of off-site biodiversity units reduces based on their distance from the site or if statutory credits are purchased.

MM150 – Monitoring Framework

14. The HBF supports the updating of the Monitoring Framework found in MM150 in that it clearly identifies how relevant policies will be monitored using identified sources of information. However, it is considered that for the Monitoring Framework to be effective, it also needs to identify appropriate remedial actions which would be undertaken if the targets 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 policy requirements or preparing a new Local Plan.

Future Engagement

15. The HBF trusts that the Council and the Planning Inspector will find these comments useful as the Local Plan progresses. We would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

Yours faithfully,

[Redacted signature]

[Redacted name]

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Home Builders Federation

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