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Planning Department,
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SENT BY EMAIL
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5th August 2025

Dear Planning Policy Team,

BOOTLE AREA ACTION PLAN: MAIN MODIFICATIONS

1. Thank you for consulting with the Home Builders Federation (HBF) on the Bootle Area Action Plan 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. The HBF has submitted comments on these Main Modifications to assist the Council in producing a sound Plan.

MM3: Policy BAAP2 Best Use of Resources

4. The HBF continues to consider that this policy is unsound and the reference to the minimum requirement of 110 litres per person per day should be deleted. The HBF do not consider that the policy has been justified or evidenced.

MM7: BAAP17 New Section 6A

5. The Council propose to add a new section after section 6, which states that 'If the above requirements cannot be achieved because it is not economically viable, this will have to be clearly demonstrated to the satisfaction of the Council'.
6. The HBF considers that this is a useful addition to the policy, however, viability should not be the only consideration in relation to the mix provided. The Council should also give consideration to the market demand, local characteristics, and the need of those on the housing waiting list. The HBF recommends that further modifications are added to this policy.

MM10: Policy BAAP24

7. The Council propose to amend Part 3 of the policy to state that the total financial contribution can be offset through providing environmental improvements off-site, or on-site if these

are substantively over and above normal policy requirements and the Council considers that they provide clear benefits to future residents and the wider neighbourhood. The HBF continues to consider that the policy is not sound and should be deleted, however, if retained recognition that improvements can be made on site appears appropriate. The HBF is, however, concerned by the reference to 'substantively over and above normal policy requirements', the HBF would question why the provision needs to be 'substantively' over and how the level of provision will be determined.

Future Engagement

8. I trust that the Council will find these comments useful as it continues to progress its Local Plan to adoption. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
9. The HBF would like to be kept informed of the publication of the Inspector's Report, the adoption of the Plan and any other consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,

Joanne Harding
Planning Manager – Local Plan (North)