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Dear Sir / Madam,

### **LANCASTER LOCAL PLAN REVIEW: SCOPING CONSULTATION**

1. Thank you for consulting with the Home Builders Federation (HBF) on the Lancaster Local Plan Review Scoping Consultation.
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 notes that this Plan Review will not be revisiting the housing and employment land allocations or numbers and that the review will only consider climate change issues in the context of the planning system.

#### **Q1. What changes would you like to see made to the Local Plan from a climate change perspective?**

4. The HBF considers that the construction of new homes creates unique opportunities to protect and enhance our environment in a multitude of exciting ways. The HBF considers that the Council should work with the homebuilding industry closely to ensure that any changes to the Plan are both realistic and viable, and that as far as possible they do not overlap with changes being made at a national level.

#### **Q4. What do you think are the main challenges we face in the district?**

5. The HBF considers that one of the main challenges will be to provide an appropriate balance between protecting the environment and addressing climate change and ensuring sufficient homes are delivered. This will mean ensuring that any policies implemented locally are viable and achievable.

**Q8. What impacts do you think new planning policy in the context of climate change could have on your business, organisation or community?**

6. The HBF notes that through robust design and with great sensitivity to our surroundings, today's new build developments are nearly unrecognisable from what has gone before helping our sector to play its part in protecting our natural resources (new homes built today already produce carbon emissions 70% lower than a typical older property).
7. Dependent on the policy introduced in relation to climate change there are numerous considerations that may need to be factored in including; achieving net zero greenhouse gases; water issues; the impact of new homes on bio-diversity and nature; what resources are used and waste is produced; air quality; flood and climate resistance; the wider effect housing has on its social and built environment. However, these policies may also require input and collaboration from a broad range of stakeholders, which will also need to be given consideration. Technologies will need to be developed and proved and then mainstreamed – not least with regards to post gas heating solutions; whilst consumers will need to be consulted with and educated as new technologies emerge. Supply chains will need to be created; new skills and training developed for production and maintenance of new technologies, and person capacity built.
8. The Council should note that a new cross sector Future Homes Task Force has announced that a multi-million-pound Delivery Hub will be set up to manage the home building industry's drive to meet the environmental targets set out by Government. The Task Force comprises of representatives from across all the sectors that shape new homes including government, house building, utility provision, material suppliers and environmental groups.

**Policy DM2 – Housing Standards**

9. The consultation suggests that the climate change review provides the opportunity to reassess and potentially widen the scope of the standards currently included in the Plan in relation to energy efficiency. The consultation states that the Council is awaiting the outcomes of the Government's consultation on the 'Future Homes Standard'.
10. Today's new homes are very energy efficient with lower heating bills for residents compared to existing older homes. The HBF supports moving towards greater energy efficiency via a nationally consistent set of standards and a timetable for achieving any enhancements, which is universally understood and technically implementable.
11. The Council should also note that the Government estimate the Future Homes Standard increased costs by circa £2,557 - £4,847 per dwelling, this will need to be considered in relation to the viability of delivery of homes in the future.

## Policy DM29 – Key Design Principles

12. The consultation suggests that these design principles will be reviewed to reflect the climate change agenda.
13. The currently adopted principles state that *'the Council will expect development to incorporate electric vehicle charging points'*. The HBF is supportive of encouragement for the use of electric and hybrid vehicles via a national standardised approach implemented through the Building Regulations to ensure a consistent approach to future proofing the housing stock. The Department of Transport held a consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings, which ended on 7th October 2019.
14. This consultation set out the Government's preferred option to introduce a new functional requirement under Schedule 1 to the Building Regulations 2010, which is expected to come into force in 2020/2021. The inclusion of EVCP requirements within the Building Regulations 2010 will introduce a standardised consistent approach to EVCPs in new buildings across the country. The requirements proposed apply to car parking spaces in or adjacent to buildings and the intention is for there to be one charge point per dwelling rather than per parking space. It is proposed that charging points must be at least Mode 3 or equivalent with a minimum power rating output of 7kW (expected increases in battery sizes and technology developments may make charge points less than 7 kW obsolete for future car models, 7 kW is considered a sufficiently future-proofed standard for home charging) fitted with a universal socket to charge all types of electric vehicle currently on the market and meet relevant safety requirements. All charge points installed under the Building Regulations should be un-tethered and the location must comply with the Equality Act 2010 and the accessibility requirements set out in the Building Regulations Part M. The Government has estimated installation of such charging points add on an additional cost of approximately £976.
15. The Government has also recognised the possible impact on housing supply, where the requirements are not technically feasible. The Government's recent consultation proposed introducing exemptions for such developments. The costs of installing the cables and the charge point hardware will vary considerably based on site-specific conditions in relation to the local grid. The introduction of EVCPs in new buildings will impact on the electricity demand from these buildings especially for multi-dwelling buildings. A requirement for large numbers of EVCPs will require a larger connection to the development and will introduce a power supply requirement, which may otherwise not be needed. The level of upgrade needed is dependent on the capacity available in the local network resulting in additional costs in relation to charge point instalment. The Government recognises that the cost of installing charge points will be higher in areas where significant electrical capacity reinforcements are needed. In certain cases, the need to install charge points could necessitate significant grid upgrades, which will be costly for the developer. Some costs would also fall on the distribution network operator. Any potential negative impact on housing supply should be mitigated with an appropriate exemption from the charge point

installation requirement based on the grid connection cost. The consultation proposes that the threshold for the exemption is set at £3,600. In the instances when this cost is exceptionally high, and likely to make developments unviable, it is the Government's view that the EVCP requirements should not apply and only the minimum Energy Performance of Buildings Directive requirements should be applied.

16. In conclusion, it is not necessary for the Council to specify provision of EVCPs because of the Government's proposed changes to Building Regulations.

#### **Policy DM30 – Sustainable Design**

17. The consultation suggests that this policy is considered permissive due to wider viability matters and proposes that the policy is reviewed in light of the climate emergency and is tightened up. It identifies that this may have viability issues which will need to be considered. The HBF also considers that if this policy was to be tightened up it would need for significant consideration to be given to the viability implications. Consideration would also need to be given to the detail that would go with this policy to allow for the industry to fully understand the requirements and how the policy will be implemented.

#### **Policy DM34 – Surface Water Run-Off and Sustainable Drainage**

18. The consultation suggests that this policy will be reviewed to determine if it is appropriate to require the provision of Sustainable Drainage System (SuDS). This policy already looks for all new development to implement sustainable drainage systems, and states that alternatives will only be permitted where it has been demonstrated to be inappropriate or impracticable. The HBF is not clear how this policy could be amended further.

#### **Policy DM58 – Infrastructure Delivery and Funding**

19. The consultation proposes to clarify within this policy the role of infrastructure in mitigating the impacts of climate change and to set out whether the Council will introduce a Community Infrastructure Levy (CIL).
20. The HBF would support the Council in providing more clarity as to whether the Council will introduce a CIL and to give consideration to the viability of this proposal. In plan-making, viability is very closely linked to the concept of deliverability.
21. The HBF would also generally support the Council in providing more detail on the role of infrastructure in mitigating the impacts of climate change, this could be provided through the Infrastructure Delivery Plan (IDP).

#### **Policy DM59 – Telecommunications and Broadband Improvements**

22. The consultation suggests that the review provides the opportunity to further explore the issue of digital connectivity and how this can assist in reducing the need to travel.
23. The HBF generally considers that digital infrastructure is an important part of integrated development within an area. However, the inclusion of digital

infrastructure such as high-speed broadband and fibre is not within the direct control of the development industry. The house building industry is fully aware of the benefits of having their homes connected to super-fast broadband and what their customers will demand.

24. The HBF considers that the Council should seek to work proactively with telecommunications providers to extend provision and not rely on the development industry to provide for such infrastructure.

#### **Future Engagement**

25. I trust that the Council will find these comments useful as it continues to progress its Local Plan Review. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
26. 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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