

St Cuthbert's Garden Village  
Economic Development  
Carlisle City Council  
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Carlisle  
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SENT BY EMAIL  
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21/12/2020

Dear Sir / Madam,

### **ST CUTHBERT'S GARDEN VILLAGE CARLISLE LOCAL PLAN: PREFERRED OPTIONS CONSULTATION**

1. Thank you for consulting with the Home Builders Federation (HBF) on the St Cuthbert's Garden Village Local Plan Preferred Options Policies 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 wishes to make the following comments upon Preferred Options for the St Cuthbert's Garden Village. The Council is encouraged to engage with the industry to ensure that the concepts proposed are realistic, achievable and viable. The HBF and our members can often provide valuable information and experience with regards to the collection of evidence and information.

#### **Delivering St Cuthbert's**

4. This policy looks for land to accommodate approximately 2000 new homes between 2022 and 2030. It states that *'developers will need to demonstrate that their proposals contribute to an overall mix of dwelling types, sizes and tenures which help to meet identified local housing need'*.
5. 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.

### ***Delivering St Cuthbert's Questions***

*Is the policy sufficiently strong and clear enough to prevent piecemeal development?*

6. It is not entirely clear what the Council is trying to achieve through this question but the HBF would assume that if the Council works closely with the homebuilding and development industry bringing forward sites within this area that any negative connotations associated with piecemeal development can be avoided.

### **Planning Obligations**

7. This policy looks for development to deliver, or contribute towards, the provision of supporting infrastructure. It goes on to state that for larger applications which require a phasing schedule that the ability of the developer to move on to the next phase will be dependent on the infrastructure in previous phases having been delivered. It also sets out when consideration will be given to the need for reduced planning obligations.
8. The HBF has some concerns around the practicality of the requirement for infrastructure to be provided in phases and whether this will be the most appropriate or most effective way to serve the development. The HBF would also be interested to know whether any consideration has been given to whether this would be viable for larger developments.

### ***Planning Obligations: Questions***

*In order to take into account, the continually changing market, should there be a mechanism to review contributions at fixed stages throughout a development:*

1. *Should this only apply to a certain threshold? If so, what threshold do you suggest?*
  2. *What fixed stages would be deemed appropriate?*
  3. *Do you agree that any re-assessment should be equally applicable in a rising market as a falling market?*
9. The HBF does not consider that review mechanisms are an appropriate tool to improve viability or incentivise owners to sell, and as such, the HBF would urge the Council to think carefully about the impact such a mechanism may have on the future delivery of land to the market and what the aims and objectives would be. The HBF would be happy to assist in this deliberation but would strongly suggest some reflection is needed as this approach is more likely to disincentive investment decisions.

### **Affordable Housing Policy**

10. This policy requires development proposals of 11 or more houses will be required to deliver 20% affordable housing on site, with a tenure split of 50%

social or affordable rent and 50% for intermediate low-cost home ownership housing.

**Affordable Housing Policy Questions:**

1. *Should the policy include a % requirement for specific affordable house types on site e.g. bungalows or apartments?*
2. *Should the policy have a higher threshold above which the requirement to provide affordable housing will be triggered?*

11. It is difficult to comment on the appropriateness of the affordable housing policy, and whether it should be amended, without updated viability evidence to determine whether this policy is appropriate and achievable. The HBF would recommend that the Council seek to update the evidence base to support this policy and ensure that the any policy is achievable.

**Low Carbon Development**

12. This policy states that *'as a minimum it will be expected that all new residential developments should demonstrate a reduction in CO2 emissions of 20% above part L in line with the Future Homes Standard embracing high building fabric standards and low carbon heating systems such as heat pumps, triple glazing and high levels of insulation'*.
13. It also looks for development to enable the behavioural shift of its occupants towards smart and sustainable living by including electric vehicle charging points, access to high-speed broadband, smart energy efficient heating systems, highly accessible and secure cycle storage, systems to allow for the efficient use of water and / or grey water harvesting / usage, and photovoltaic panels.

**Low Carbon Development Questions:**

1. *Do you agree with the proposal to introduce requirements for new homes ahead of the standards proposed through the Government's 'Future Homes Standard' consultation?*
2. *Should this policy make allowances for carbon offsetting? If so, how should this be reflected in the policy?*
3. *Should this policy be more ambitious?*
4. *How could this policy be expanded to include a greater emphasis on climate change resilience and more on the use of renewable energy?*

14. The HBF considers that the Council should not be getting ahead of Government proposals for national policy concerning climate change and should not be seeking to be more ambitious than any national standard. The Future Homes Standard consultation (ended on 7th February 2020) set out the Government's intention to future proof new homes with low carbon heating and world-leading levels of energy efficiency. This consultation addressed options to uplift standards for Part L (Conservation of Fuel & Power) and changes to Part F (Ventilation) Building Regulations. The HBF considers that it is more appropriate for these standards to be set a national level and do not consider that an additional policy in this document is appropriate.

15. The Council should also note that the Government estimated that the Future Homes Standard increased costs by circa £2,557 - £4,847 per dwelling, this will need to be considered in any viability assessment.
16. In relation to some of the other elements of the policy particularly in relation to smart living the Council should also consider the costs and viability of these requirements, and whether a policy is required highlighting their need, given Government's proposals for national policies and regulations.
17. In relation to electric vehicle charging points (EVCP) the Department of Transport held a consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings (ended on 7th October 2019) set out the Government's preferred option to introduce a new functional requirement under Schedule 1 to the Building Regulations 2010. 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.
18. The Government has also recognised the possible impact on housing supply, where the requirements are not technically feasible. For example, the Government recognises that the cost of installing charge points will be higher in areas where significant electrical capacity reinforcements are needed. 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 introduction of EVCPs along with other electric demand technology could lead to problems with capacity not only in the grid but inside the dwelling too. The proposals place an undue burden on new build dwellings without making any inroads into provision of EVCPs in the existing housing stock.
19. In relation to highspeed broadband, the Council should not impose new electronic communications requirements beyond the provision of infrastructure as set out in statutory Building Regulations. In the Budget (11th March 2020), the Government confirmed future legislation to ensure that new build homes are built with gigabit-capable broadband. The Government will amend Part R "Physical Infrastructure for High-Speed Electronic Communications Networks" of the Building Regulations 2010 to place obligations on housing developers to work

with network operators to install gigabit broadband, where this can be done within a commercial cost cap. By taking these steps, the Government intends to overcome any existing market failure.

20. The HBF also considers that it will also be important that the Council ensures that it liaises with the appropriate service providers to ensure that the provision of all these smart and sustainable requirements are achievable, and that they are not solely relying on the development industry to undertake this work.

### **Smart Environments**

21. This policy requires developers to show how their development will connect to the internet, with a connection of 1Gb/s expected, applicants are required to engage with internet providers to establish how and when this will be achieved.
22. It also states that all electric vehicle charging points, either intended for private or communal use, must be capable of a cloud-based connection to the internet.

### **Smart Environments Questions:**

*1. This policy seeks to make it easier for people to make smarter choices about how they live and work. What do you think a new home should include to help support home working?*

*2. Are the proposed highspeed broadband statements asking for the right information?*

*3. Should the policy encourage and support expanding the 5G network across the area?*

23. There is a widespread sense that households, having spent months in lockdown, have revalued the importance of 'home'. Importantly, while demand has been strong post lockdown, the pattern of purchasing has shifted greatly. Changes in house prices show that it is houses rather than flats that are most in demand. Data from ONS for August 2020 suggested prices of detached homes were up 3.1% on a year earlier, while prices of flats fell 0.5%. This inevitably suggests that Covid-19 is a factor, among those who re-evaluated their housing needs during lockdown. Research by Zoopla suggest that topping the most-search terms for home buyers list for 2020 was a 'garden', with detached, secluded and rural all making it to the top ten. 'Garden' also topped the list for renters.
24. It has almost become a cliché of the Covid-19 crisis that the pandemic has not so much changed the way we do things as accelerated underlying trends. This is particularly true when it comes to changing working patterns. In repeated studies this year (see Arup, CBRE, and Savills) well over 80% of respondents to their surveys say they will continue to work at home for at least part of the week in future. During lockdown, the Office for National Statistics estimated that more than a third of the UK workforce worked from home, without travelling to work at all, a further 9% mixed working at home with going to work. That suggests about 10 million people were working exclusively from home with almost 3 million more working at home some of the time. The working from home genie is well and truly out of the bottle. However, working out how many people might shift to

permanent homeworking, or become far more flexible in where they work, is hard to know.

25. The most obvious implication for housebuilders of a rapid rise in homeworking is the increased need among households for a 'spare room' in which to work. However, the calculation of whether this means building more larger new homes, or not, is far from straightforward. It will rest on the existing stock in any given housing market relative to the demand.
26. 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. The HBF considers that the Broadband Statements required should not be overly onerous on the developer and should recognise the role of both the developer and the providers.
27. 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.

#### **Biodiversity Net Gain**

28. This policy requires all new development to deliver a measurable biodiversity net gain at a minimum of 10%. It states that consideration will be given to applications that seek to achieve greater than 10%.

#### ***Biodiversity Net Gain Questions:***

1. *Does a minimum requirement of 10% net gain go far enough?*
  2. *Should all development be required to deliver a net gain in biodiversity? If not, what types/sizes of development should be excluded from the requirement?*
29. It is the HBF's opinion that the Councils should not deviate from the Government's proposals on biodiversity gain. In 2019 Spring Statement, the Government announced that it would mandate net gains for biodiversity in the forthcoming Environment Bill. This legislation will require development to achieve a 10% net gain for biodiversity. The Government will use the DEFRA Biodiversity Metric to measure changes to biodiversity under net gain requirements established in the Environment Bill. The mandatory requirement offers developers a level playing field nationally and reduced risks of unexpected costs and delays. It is also likely that Government will set out the potential exemptions to the requirement.

#### **Self and Custom Build Housing**

30. This policy requires development proposals for 100 or more new dwellings to provide at least 5% of plots for self and custom build development.

#### ***Self and Custom Build Housing Questions:***

1. *Is a 5% requirement for self/custom build plots on applications over 100 dwellings reasonable?*
2. *Should the Council seek to provide a fully serviced pilot site for self and custom build development?*
3. *Is it reasonable to enforce a three-year time limit on self/custom builders to avoid unimplemented plots within wider development sites?*

31. Many of our members will be able to assist the custom build sector either through the physical building of dwellings on behalf of the homeowner or through the provision of plots for sale to custom builders. The HBF is, therefore, not opposed to the idea of increasing the self-build and custom build sector for its potential contribution to the overall housing supply. However, the Council's approach is restrictive rather than permissive by requiring the inclusion of such housing on sites of 100 dwellings or more. This policy approach only changes the house building delivery mechanism from one form of house building company to another without any consequential additional contribution to boosting housing supply. The HBF would also be interested to see the evidence to support the idea that those wanting to self-build would actually consider building within a larger housing development.
32. The provision of a fully serviced pilot site for self and custom build may be beneficial in boosting supply. The HBF would recommend appropriate evidence is collated to ensure that house building delivery from this source provides an additional contribution to boosting housing supply. This is likely to include engaging with landowners and working with custom build developers to maximise opportunities.

### **Monitoring framework**

33. The Monitoring Framework is not provided within the document, but the document states that alongside each policy an objective, indicator, trigger and potential actions will be established to ensure that the policy is monitorable [SMART principles will be used]. The HBF would generally support this proposal.

### **Future Engagement**

34. 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.
35. The HBF would like to be kept informed of the progress of this document. Please use the contact details provided below for future correspondence.

Yours sincerely,



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