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SENT BY EMAIL
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Dear Planning Policy Team,

SOUTH LAKELAND LOCAL PLAN REVIEW: ISSUES AND OPTIONS

1. Thank you for consulting with the Home Builders Federation (HBF) on South Lakeland Local Plan Review Issues and Options 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.

Policy Options 1.2: Achieving Carbon Reduction from new development.

Question 4: Which of these policy options for achieving carbon reduction in new development do you support and why? Please give your reasons, noting the reference number, and add any other comments or alternative suggestions.

3. The HBF considers that the Council should await the higher energy efficiency standards set nationally by Government and not set higher local standards as set out in Option PO1.2/i.

Policy Approaches 1.3: Sustainable Construction and Design

Question 5: Which of these policy approaches to sustainable construction and design to mitigate climate change impacts, do you support and why? Please give your reasons, noting the relevant reference number, and add any other comments or alternative suggestions.

4. The HBF considers that it would be appropriate for the Council to prepare a Local Design Guide as a Supplementary Planning Document, in accordance with guidance in the National Model Design Code, which provides clear guidance on requirements and advice on sustainable construction, design, and energy efficiency, to help mitigate the impacts of climate change arising from new development in line with Option PA1.3/b. However, it should be noted that PPG¹ states that '*Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material*

¹ ID: 61-008-20190315



consideration in decision-making. They should not add unnecessarily to the financial burdens on development. Therefore, the Council will need to ensure that any SPD will not be introducing new policies and will not add unnecessarily to the financial burdens on development.

Policy Approaches 1.7: Other Policy Approaches relating to Climate Change

Question 10: Which of these policy approaches to adapting to or mitigating the impacts of climate change do you support and why? Please give your reasons, noting the relevant reference numbers, and add any other comments or alternative suggestions.

5. The HBF considers an overarching strategic policy on climate change in line with national policy and guidance may be considered appropriate. The HBF considers that tackling climate change by promoting greater energy efficiency via a nationally consistent set of standards and timetable, which is universally understood and technically implementable, is the most appropriate way forward. The Future Homes Standard will ensure that new homes will produce at least 75% lower CO2 emissions than one built to current energy efficiency requirements. By delivering carbon reductions through the fabric and building services in a home rather than relying on wider carbon offsetting, the Future Homes Standard will ensure new homes have a smaller carbon footprint than any previous Government policy. In addition, this footprint will continue to reduce over time as the electricity grid decarbonises.
6. On 27 July 2021, the Future Homes Delivery Plan² was published (click for the link to [The Future Homes Delivery Plan](#) – Summary of the goals, the shared roadmap & the Future Homes Delivery Hub). To drive and oversee the plan, the new delivery Hub will be launched in September, with the support and involvement of Government. The Hub will help facilitate a sector-wide approach to identify the metrics, more detailed targets where necessary, methods and innovations to meet the goals and the collaborations required with supply chains and other sectors. It will incorporate the needs of all parties including the public and private sector and crucially, consumers, such that they can all play their part in delivering environmentally conscious homes that people want to live in.
7. The HBF considers that the Councils should comply with the Government's intention of setting standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of individual Council's specifying their own policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. The Council should not need to set local energy efficiency standards to achieve the shared net zero goal because of the higher levels of energy efficiency standards for new homes proposed in the 2021 Part L uplift and the Future Homes Standard 2025.
8. The HBF generally considers that it is appropriate to promote sustainable development and to reduce the need to travel or promote the use of active and sustainable travel.
9. The HBF considers that it could be appropriate for the Council to include policies that would promote or encourage carbon sequestration, rather than a requirement, or that

² <https://www.futurehomes.org.uk/delivery-plan>

would promote or support the retrofitting of existing buildings to include energy efficiency measures or climate adaptation or mitigation or renewables.

10. The HBF considers that it should not be necessary to introduce or prepare a Sustainability Statement for development. Assuming that the Local Plan is prepared on the basis of creating sustainable development, any proposals that is in accordance with the Plan should be sustainable. Any sustainability statement or checklist will just provide another unnecessary burden on the applicant.
11. The HBF considers that it can be useful for the Council to monitor their plan, this may include the annual change in carbon dioxide emissions and the progress towards carbon neutrality.
12. The HBF recognises that electric vehicles will be part of the solution to transitioning to a low carbon future. However, the Council should acknowledge that this proposed policy approach may be superseded by the Government's proposals to change Building Regulations and may not be needed. The Department of Transport 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 requirement for EVCPs under Part S of the Building Regulations. The inclusion of EVCP requirements within the Building Regulations will introduce a standardised consistent approach to EVCPs in new buildings across the country.
13. The HBF does not consider that it is necessary for South Lakeland to set a standard for sustainable construction or for additional flood resilience features. If the Council does consider it appropriate to include any additional local or higher standards the HBF considers that the Council will need to consider the detail, the potential impact on viability and deliverability and the impact on the liveability of the development. The HBF considers that increasing the numbers of locally set standards reduces the opportunities for developers to use modern methods of construction (MMC), increases the cost of development and potentially slows down the development of new homes.

Policy Options 5.1: Providing the right number of new homes

Question 113: Which of these policy options for setting a new housing requirement in the Local Plan do you support and why? Please give your reasons, noting the reference number, and add any other comments or alternative suggestions.

14. The HBF considers that the Council should use the standard method as the starting point for their consideration of the housing requirement as set out in the NPPF, however, the PPG highlights circumstances when it may be appropriate to plan for a higher housing need figure than the standard method indicates. This includes previous assessments of need such as the Council's Strategic Housing Market Assessment (SHMA) and where previous levels of housing delivery are significantly greater than the outcome of the standard method.

Policy Options 5.2: Providing the right number of new affordable homes

Question 114: Which of these policy options for requiring affordable housing do you support and why? Please give your reasons, noting the reference number, and add any other comments or alternative suggestions.

15. The HBF considers that the Council should update their evidence in relation to affordable housing need and viability and work to ensure that their policy provides an appropriate balance. It may be appropriate for the Council to consider a flexible approach to affordable housing looking at the viability implications in different areas and for different site types. The Council will need to consider the implications of emerging national and local policies such as those in relation to the Future Homes Standard, Biodiversity Net Gain and EV Charging as part of their viability assessment, particularly those elements that will become mandatory and will need to be addressed prior to the provision of any affordable homes.

Policy Options 5.3: Providing the right types of affordable housing

Question 115: Which of these policy options for affordable housing types do you support and why? Please give your reasons, noting the reference number, and add any other comments or alternative suggestions.

16. The HBF considers that the Council should give consideration to the Governments requirements for affordable homes. The NPPF looks for major development to provide a least 10% of the total number of homes to be available for affordable home ownership. The PPG looks for at least 25% of all affordable homes to be First Homes. The provision of First Homes can contribute to the 10% affordable home ownership requirement.
17. The HBF also considers that the Council should consider the viability impacts of any requirement, it may be that the provision of an increased proportion of homes for affordable home ownership rather than affordable rent may be more viable, and may allow for more affordable homes to be delivered. The Council will have to balance this against the level of need for affordable homes, and the type of affordable home that can be afforded by those in need.

Policy Options 5.4: Providing the right types and mix of new homes

Question 116: Which of these policy options for housing mix and types do you support and why? Please give your reasons, noting the reference number, and add any other comments or alternative suggestions.

18. The HBF considers that the Council should maintain the current flexibility of the different types / sizes that should be provided (Approach PO5.4/i). If the Council were to set up specific requirements the HBF considers that the Council will need to ensure that they refer to the most up to date evidence and allow for alternate forms of evidence to be considered, not just the SHMA.

Policy Options 5.5: Supporting delivery of self-build homes

Question 117: Which of these policy options for supporting self-build do you support and why? Please give your reasons, noting the reference number, and add any other comments or alternative suggestions.

19. The HBF considers that a policy which provides encouragement for self and custom build and identifies where it would be supported in principle is appropriate (Approach PO5.5/i). The HBF also considers that it may be beneficial in addition to this to identify

sites through working with those on the self-build register, local community groups and landowners to allocate specifically for self and custom build homes.

Policy Options 5.6: Providing homes for local people

Question 118: Which of these policy options for local occupancy housing do you support and why? Please give your reasons, noting the reference number, and add any other comments or alternative suggestions.

20. The HBF considers that current policy approach, whereby only affordable homes will continue to be restricted to people with local connections who will live in them as their main homes (Approach PO5.6/i), is appropriate.

Policy Approaches 5.8: Older People's Housing

Question 120: Which of these policy approaches to older people's housing do you support and why? Please give your reasons, noting the relevant reference numbers, and add any other comments or alternative suggestions.

21. The HBF considers that it could be beneficial to allocate sites specifically for specialist housing. This could help to promote choice and range in the types of housing available for older people, allowing for their varying needs to be met.

Policy Approach 7.3: Parking Provision

Question 136: Do you support this policy approach to Parking Provision? Please give your reasons, noting the relevant reference numbers, and any other comments or alternative suggestions.

22. The HBF recognises that electric vehicles will be part of the solution to transitioning to a low carbon future. The Department of Transport 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 requirement for EVCPs under Part S of the Building Regulations. The inclusion of EVCP requirements within the Building Regulations will introduce a standardised consistent approach to EVCPs in new buildings across the country. Therefore, it is unlikely that this will form part of any need for an update or amendment to the current policy.

Policy Approaches 7.4: Infrastructure Delivery and Developer Contributions

Question 137: Which of these policy approaches to Infrastructure Delivery and Developer Contributions do you support and why? Please give your reasons, noting the relevant reference numbers, and any other comments or alternative suggestions.

23. The HBF considers that it would be useful for the Council to identify infrastructure requirements for proposed site allocations and for them to be set out in site specific policies and considered as part of the viability assessment.
24. The HBF also considers that the Council should work closely with infrastructure and service providers to ensure that appropriate provision can be provided, to identify capacity issues and to help to address these issues.

Policy Approach 7.5: Broadband and Digital Infrastructure

Question 138: Do you support this policy approach to Broadband and Digital Infrastructure? Please give your reasons, noting the relevant reference numbers, and any other comments or alternative suggestions.

25. The HBF generally considers that digital infrastructure is an important part of integrated development within an area. The house building industry is fully aware of the benefits of having their homes connected to broadband and digital infrastructure. However, the HBF considers that the Council should acknowledge that the provision of digital infrastructure is not within the direct control of the homebuilder and that service providers are the only ones who can confirm access to the appropriate infrastructure. The HBF considers that the Council should seek to work closely with the telecommunications providers to ensure appropriate provision is made.

26. Policy Approaches 7.6: Development Viability

27. *Question 139: Which of these policy approaches to Development Viability do you support and why? Please give your reasons, noting the relevant reference numbers, and any other comments or alternative suggestions.*

28. The HBF considers that it would be appropriate to undertake a viability assessment of the Plan that considers the cost of all policy requirements at both national and local level. The HBF also considers that it would be appropriate for the Council to include a policy which identifies that a viability assessment can be undertaken by the applicant where there are viability issues in relation to the proposed development. An application-level viability assessment may be appropriate where the evidence underpinning the Plan level Viability Assessment is out of date, where there have been a change in circumstances, or where there are site specific issues that have not been considered as part of the Plan level assessment, there may be further circumstances where an application level assessment is required and these will need to be considered on a case by case basis.

Policy Approaches 8.2: Protecting and Enhancing Nature Conservation Assets and Delivering Biodiversity Net Gain

Question 143: Should the Council seek a higher percentage than 10% of net gain in biodiversity? Are you aware of any sites or land that may be available for habitat creation/restoration to support the implementation of this requirement?

29. The HBF considers that a policy in relation to biodiversity net gain is not necessary as the Government's proposals as set out in the Environment Bill include a mandatory national requirement for biodiversity gain. The Government also intends to make provision for a transition period of two years, the specifics of this transition period will provide clear and timely guidance on understanding what will be required and when. The HBF does not consider that it is appropriate for the Council to seek a higher percentage net gain, as this is likely to compromise viability. There are significant additional costs associated with biodiversity gain, which should be fully accounted for in the Council's viability assessment.

Policy Approaches 8.5: Achieving Quality Design

Question 147: Which of these policy approaches to achieving high quality design do you support and why? Please give your reasons, noting the relevant reference number, and adding any other comments or alternative suggestions.

30. The HBF considers that the Council may want to consider preparing Design Codes, whether that is a general document for the Council area or more site-specific document. The HBF considers that the Council should work closely with the development industry to ensure that any Design Code produced is realistic and deliverable, and meets the expectations of those looking to buy a new home in the area.

Future Engagement

31. 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.

32. 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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