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SENT BY EMAIL  
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22/08/2022

Dear Strategic Planning Team,

### **COPELAND LOCAL PLAN: PUBLICATION DRAFT**

1. Thank you for consulting with the Home Builders Federation (HBF) on the Addendum to the Copeland Local Plan Publications Draft.
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 Council will be aware that the HBF has provided comments throughout the progression of this document, and we would like to submit the following comments upon the selected policies within this Addendum to the Publication Draft consultation document.

#### **Policy N5: Protection of Water Resources**

4. The first section of this policy suggests that new development must seek to protect or improve the quality of surface and groundwater. The HBF considers that it is not appropriate for the Council to require new developments to look to improve the quality of surface and ground water, this wording should be amended to protecting or maintaining the quality.
5. The newly added section of the policy in relation to the need for nutrient neutrality whilst a useful acknowledgement that the Council will be considering nutrients does little to add to the existing Habitats Regulations Assessment (HRA) process. The HBF is also concerned in relation to the implications of this policy, and particularly in relation to the viability of development, and considers that this may need further consideration.
6. The HBF would also suggest that the Council may want to further consider the role of the water industry in the protection of water resources and nutrient neutrality. This policy



places a lot of emphasis on the development industry to protect water quality, to ensure water resources, to protect the environment and to create nutrient neutrality, whereas most of the actual responsibility for these elements will be reliant on the work of the water industry.

7. The Council will be aware that the Government published a written ministerial statement (WMS) in relation to improving water quality during the consultation period for this addendum. The WMS announces a package of measures that the Government will introduce to tackle the challenge of nutrient pollution. It proposes an amendment to the Levelling Up and Regeneration Bill that will place a new statutory duty of water and sewerage companies in England to upgrade wastewater treatment works to the highest technically achievable limits by 2030. This will also need to be taken into consideration.

### **Future Engagement**

8. 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.
9. 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,



**Joanne Harding**  
**Planning Manager – Local Plan (North)**

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