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Dear Planning and Housing Strategy Team,

LANCASTER LOCAL PLAN: LANCASTER SOUTH AAP – TOPIC PAPERS

1. Thank you for consulting with the Home Builders Federation (HBF) on the Lancaster South Area Action Plan Topic Papers.
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.

Topic Paper 1: Establishing a Development Strategy

3. The Topic Paper suggests three approaches to identifying a timeframe for the Area Action Plan, these vary from having the same lifespan as the Local Plan (period to 2031), a 15-year span from adoption or a longer-term period of up to 50 years. The Council suggest that preparing a Plan which covers a 20-year period will allow for a planning framework which is holistic and deals with the broad location for growth in its entirety. The HBF considers that a 20-year period could be appropriate, assuming that this is sufficient to cover the development of the sites and that it is reviewed regularly to ensure that it remains appropriate throughout that period and that it is amended or updated if necessary.
4. The Topic Paper suggests three approaches to development densities these range from maximising opportunities to boost densities, to provide a balance of high and low densities and to provide low densities. The Council propose to use the balance of high and low densities approach as the starting point for investigating development densities. The Council also acknowledge that the density of development might be constrained by specific issues such as topography. The HBF considers that approach B which looks towards a balance between high and low density and acknowledges that there will be circumstances that will impact on the density of development appears to be an appropriate starting point.



Topic Paper 3: Addressing the Climate Emergency & Community Resilience

5. The Topic Paper sets out five potential approaches to Energy Efficiency Standards, these include not setting higher standards than the Building Regulations, using the standards set in the Climate Emergency Local Plan Review (CELPR), providing targets that focus on regulated energy use with net zero emissions for regulated energy, or providing targets focused on operational energy use. The HBF does not consider that the Council setting its own energy efficiency standards is the appropriate approach. Whilst the ambitious and aspirational aim to achieve net zero is lauded, the HBF is concerned that the Council is adding to the complexity of policy, regulations and standards that housebuilders are already expected to comply with. The key to success is standardisation and avoidance of individual Councils specifying their own policy approach, which undermines economies of scale for product manufacturers, suppliers and developers.
6. The Topic Paper identifies potential approaches to climate focused design in new buildings, these range from A - no further climate focused design policies other than those in the Local Plan, B- the Action Plan sets out broad design policies for climate focused development and C- the Action Plan looks to ensure that development in the Garden Village should deliver residential development that represents best practice for climate focused design. The Council propose that approach C will be used as the starting point for exploring climate focused design. The HBF does not consider that it would be appropriate for the Council to require residential development to meet locally derived standards that significantly over and above those applied by national design standards in relation to the climate focused design. However, the HBF does consider that it could be appropriate to provide support for these developments where homebuilders are able to provide best practice or if homebuilders wish to use new or innovative technologies as part of their homes in the Garden Village.
7. The Topic Paper sets out four potential approaches to addressing embodied carbon through new development, these range from embodied carbon not being included as a metric for net zero, that embodied carbon targets will be suggested and encouraged, that design codes which support a reduction in embodied carbon will be brought forward and full life cycle assessments will be required, and that embodied carbon targets will be set. The HBF considers that if the Council is to introduce a policy in relation to embodied carbon and whole life cycles it will have to closely consider how it will be monitored and what the implications are for the preparation of any assessment, particularly in relation to how easily accessible any data is, and that it will have to take into consideration that much of the responsibility for emissions will lie in areas outside of the control of the homebuilding industry, including material extraction and transportation, occupation and maintenance, demolition and disposal. The Council will also have to consider how this approach could interact with other policies for example in relation to energy efficiency or resilience to heat, as well as the viability and delivery of development.

Topic Paper 4: Securing Green & Blue Infrastructure and Biodiversity Net Gain

8. This Topic Paper suggests a couple of approaches to Biodiversity Net Gain, A – rely on the mandatory 10% Biodiversity Net Gain (BNG) target or B – adopt a higher percentage

BNG for the AAP area. The HBF considers that relying on the mandatory 10% BNG figure is appropriate, and allows for developers to provide for more BNG if they are able to. The Paper goes on to consider the delivery of BNG and considers establishing a policy requirement for BNG to be provided on site, establishing a habitat bank, designating habitat areas for enhancement through BNG, and allowing BNG to be provided off-site. The HBF considers that more detail will need to be provided in relation to these approaches in order for consideration to be given to whether they are appropriate, would be viable and would work in practice. The HBF considers that the Council should work closely with landowners and developers in the area to determine if these potential approaches are appropriate. However, it is likely that a flexible approach that potentially covers elements from a number of these approaches may be the most suitable policy.

Future Engagement

9. 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.

10. 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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