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Planning and Place Service
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SENT BY EMAIL

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Dear Planning Policy Team,

LANCASTER LOCAL PLAN: CLIMATE EMERGENCY REVIEW MAIN MODIFICATIONS

1. Thank you for consulting with the Home Builders Federation (HBF) on the Lancaster Local Plan Climate Emergency Review Main Modification 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.

Strategic Policies and Land Allocations Development Plan

MM1: Policy CC1: Responding to Climate Change and Creating Environmental Sustainability

3. The Council proposes to amend paragraph 3 of this Policy to add 'should', so the policy now states that 'all development should integrate the principles of sustainable design and construction'. The Council also propose to amend paragraph 4 to add 'where appropriate'.
4. The HBF continues to consider that this policy is unsound as it is not consistent with national policy as it doesn't serve a clear purpose or avoid unnecessary duplication. The HBF continues to consider that the policy should be deleted.
5. However, if the policy is to be retained the HBF considers that the proposed additional flexibility that is incorporated by including 'should' and 'where appropriate' is an improvement to the original policy and would be in line with our previous recommendations.



Development Management Development Plan

MM13: Policy DM29: Key Design Principles

6. The HBF continues to consider that it is not necessary for part VII to refer to the need to meet the requirements of Policies DM30a, b and c, it is assumed the Plan is to be read as a whole. The HBF considers that this part of the policy should be deleted.

MM14: Policy DM30a: Sustainable Design

7. The Council proposes to delete part of this policy that requires a minimum 75% reduction in carbon emissions by 01/01/2025 and the net zero emissions by 01/01/2028. The HBF considers that this amendment is appropriate.
8. The Council proposes to make amendments to paragraph 11, 12 and 13 of the Policy in relation to the Energy and Carbon Statement. The HBF continues to consider that requirements for a Sustainable Design Statement, including the Energy and Carbon Statement, are unnecessary, however, if the Council does decide to go ahead with this requirement it should ensure that the requirement is not overly onerous and is proportionate to the scale of the development.

MM18: Policy DM 33: Development and Flood Risk

9. The Council proposes to amend paragraph 1 of this policy to delete the reference to access/egress, play/recreation areas and gardens. The HBF considers that this is appropriate and in line with the guidance set out in the PPG.
10. The Council also proposes to amend paragraph 2 of the policy so the development will have to take account of the Council's Flood Risk – Sequential Test and Exception SPD rather than being in accordance with it. The HBF considers that this is an appropriate amendment.

MM19: Policy DM34: Surface Water Run-Off and Sustainable Drainage

11. The Council proposes to amend the third paragraph of this policy to delete reference to 'above ground'. The HBF considers that this amendment is appropriate, as it allows for flexibility in relation to how SuDs are provided when considering an appropriate layout, particularly in relation to other planning policy requirements, the efficient use of land and the individual site circumstances. This flexibility is a fundamental aspect of the Sustainable Drainage Hierarchy. However, the HBF considers that the bullet points which also form part of this paragraph will also need consideration particularly in relation to the requirements for all SuDS to incorporate landscape and amenity enhancement and environmental and biodiversity benefits, which may not be possible in relation to underground attenuation.

MM30: Policy DM62: Vehicle parking provision and electric vehicle charging points

12. The Council proposes to delete the text that states that 'all new development and changes of use with associated car parking shall provide as a minimum one charging unit for each dwelling with an associated space and 20% of communal parking spaces to be provided with standalone charging'. The HBF considers that this an appropriate deletion and is appropriate in light of Building Regulations for EV Charging Points.

Future Engagement

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

14. The HBF would like to be kept informed of the adoption of the Local Plan and all forthcoming consultations upon the Development Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



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