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SENT BY EMAIL
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05/09/2024

Dear Planning Policy Team,

WESTMORLAND & FURNESS LOCAL PLAN: OUR PLACE OUR FUTURE – JOIN THE CONVERSATION

1. Thank you for consulting with the Home Builders Federation (HBF) on the Westmorland and Furness Local Plan: Our Place Our Future – Join the Conversation 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 is keen to continue to work with the Council in order to achieve an adopted local plan which enables the delivery of homes across Westmorland and Furness. The following comments addresses some of the questions provided in the consultation document with potential implications for the homebuilding industry. The HBF notes that around half of the Council's area is in national parks, including Lake District National Park and the Yorkshire Dales National Park.
4. The HBF also notes a consultation on the NPPF and the standard method for calculating housing need has commenced part way through this consultation on the Westmorland and Furness Local Plan, and that this is likely to have implications for the production of the Plan and the policies it contains. ‘Building the homes we need’ the Written Ministerial Statement (WMS) from Angela Raynor on 30th July 2024 highlights the importance of everyone local authority having a development plan in place, and states that areas at an earlier stage of plan development should prepare plans against the revised version of the NPPF and progress as quickly as possible.

Plan period

5. The HBF considers that the Council will need to ensure that their Plan covers an appropriate period. The NPPF¹ states strategic policies should look ahead over a minimum 15-year period from adoption and that where larger scale developments form

¹ NPPF December 2023 Paragraph 22



part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take in account the likely timescale for delivery.

People and Places

6. The Council have identified that how development is designed affects how towns, villages and countryside look and feel and strong influence on their character and qualities, and have stated that they are preparing a Design Code.

Question 2: How can the Plan support high quality design in new development?

7. The HBF would strongly recommend that the Council seek to work closely with the homebuilding industry in preparing their Design Code to ensure that the Code is realistic and deliverable. The Council should also take into consideration what they want to achieve in their area, including the delivery of sustainable and affordable homes and how other elements of policy including those relation to density, space standards, climate change, parking, waste storage, cycle storage etc may play a role in design.

Climate and Nature

8. The Council highlight that the Local Plan can influence the way we live, work and travel; produce energy; protect nature and use land and natural resources.

Question 3: How can the Plan reduce carbon emissions?

9. The PPG² provides examples of mitigating climate change by reducing emissions: through reducing the need to travel and providing sustainable transport; providing opportunities for renewable and low carbon energy technologies; providing opportunities for decentralised energy and heating; and promoting low carbon design approaches to reduce energy consumption in buildings. The HBF recommends that the Council seek to ensure that they produce a sustainable Plan which supports a balance of homes and employment and is in line with the guidance provided by the NPPF and the PPG.
10. The HBF considers that it is important that the Council does not set its own standards for development which may differ from the approach being taken by national Government, and that any such policy in relation to low carbon, local heat and energy solutions are implemented on a flexible basis, and that the Council recognise the decarbonisation of the national grid. This would be in line with the Written Ministerial Statement of December 2023³. The Council will also be aware that the Future Homes and Buildings Standards: 2023 consultation⁴ has been released covering Part L (conservation of fuel and power), Part F (ventilation) and Part O (overheating).

Question 6: How can the plan address flood risk?

11. The HBF considers that this should be undertaken in line with the NPPF⁵ which states that all plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future

² PPG ID: 6-003-20140612

³ <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/HCWS123>

⁴ <https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation/the-future-homes-and-buildings-standards-2023-consultation>

⁵ NPPF 2023 Paragraph 167

impacts of climate change. The NPPF also sets out where it is not possible for development to be located in areas with lower risk of flooding the exceptions test may have to be applied.

Housing

12. The Council have stated that the Local Plan will set a target for new house building, however, at this stage this isn't identified. The document sets out some of the elements that will be taken into consideration when setting the housing requirements, including population change, future economic growth, availability of affordable housing and availability of land. The HBF notes that the proposed new standard method would see an increase in the calculated local housing need to 1,430 dwellings per annum (dpa).

Question 7: Where should new housing be built?

13. The HBF considers that the Council will need to consider an appropriate balance of development, to ensure that all of their housing needs are met in terms of types and tenures; locations and markets, and to ensure that the Plan can deliver against its housing requirements.

Question 8: What types of homes do we need?

14. The HBF considers that it will be necessary to gather appropriate evidence including a housing needs assessment and a Viability Assessment to determine what types of homes may be needed and can be delivered in Westmorland and Furness. The HBF considers this is likely to include a wide range and variety of homes from homes to first time buyers, to family homes to homes to suit the older population. The HBF would encourage the Council to work with the home building industry working in the area to determine the types of homes that are currently being delivered, and where there is demand from home purchasers.
15. The HBF considers that it is appropriate for the Council to plan for the affordable needs of its community, and to ensure that it does this in line with the requirements in the NPPF⁶. This should ensure that any affordable housing requirements are clearly set out, are evidenced as viable through an assessment, and that flexibility is provided within the policy where viability may be an issue. The Council should also ensure that they have included an appropriate provision for both affordable home ownership and First Homes.
16. The HBF would highlight that if the evidence highlights a need for accessible, adaptable and wheelchair accessible homes and the Council wishes to include a policy in relation to the higher optional standards for accessible, adaptable and wheelchair homes, then Council should only do so by applying the criteria set out in the PPG. The PPG⁷ identifies the type of evidence required to introduce a policy requiring the M4 standards, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability.

⁶ NPPF 2023 paragraphs 34, 63-66

⁷ ID: 56-007-20150327

17. The Council should also note that the Government response to the Raising accessibility standards for new homes⁸ states that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations. M4(3) would continue to apply as now where there is a local planning policy in place and where a need has been identified and evidenced.

Health and Communities

18. The Council identifies that the Local Plan can support health and communities by delivering and promoting opportunities for recreation and active travel, improved air and water quality, good quality housing and housing which is adaptable to meet people's needs as they get older.

Question 14: How can we make our places healthier?

19. The HBF generally supports plans that set out how the Council will achieve improvements in health and well-being. In preparing its Local Plan the Council should normally consider the health impacts with regard to the level and location of development. Collectively the policies in the plan should ensure health benefits and limit any negative impacts and as such any development that is in accordance with that plan should already be contributing positively to the overall healthy objectives of that area.

Question 18: How can we help young people and families to stay here, and encourage those who want to live and work in the area to move here?

20. The HBF considers that many of the elements already identified by the Council will be key to helping young people and families to stay here or to move to Westmorland and Furness, these include providing appropriate homes including affordable housing, and promoting economic growth that is accessible to those people that the Council want to retain or attract to the area.

21. The Council will need to ensure that it is allocating sufficient land for homes, and supporting developments that provide a range of housing types and sizes.

Question 19: Would you like to be involved in planning the future of your local area and how can we make our consultation processes easier for you to get involved?

22. The HBF and our members would like to be involved in planning for the future of Westmorland and Furness, the HBF would encourage the Council to work closely with the home building industry to ensure that the Plan is appropriate and deliverable. The HBF would encourage the Council to continue to make documents accessible online, as well as in a format that can be downloaded and read at leisure at a later date. The HBF would recommend that any evidence that is provided to support the Local Plan is available in a timely manner and includes a plain English executive summary for ease of reading for all.

⁸ <https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes/outcome/raising-accessibility-standards-for-new-homes-summary-of-consultation-responses-and-government-response#government-response>

Viability

23. The Council will also need to ensure that they have considered viability, viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative costs of all relevant policies will not undermine deliverability of the Plan. The Council need to ensure that policy requirements should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned development to be deliverable without need for further viability assessment at the decision-making stage.

Monitoring

24. The HBF recommends that the Council include an appropriate monitoring framework which sets out the monitoring indicators along with the relevant policies, the data source and where they will be reported, this should also include the targets that the Plan is hoping to achieve and actions to be taken if the targets are not met. The HBF recommends that the Council provide details as to how the plan will actually be monitored, and identifies when, why and how actions will be taken to address any issues identified.

Future Engagement

25. 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.
26. 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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