

## THE HOME BUILDERS FEDERATION

Date: 1st May 2015

Development Plans team, South Lakeland District Council, South Lakeland House, Lowther Street, Kendal, Cumbria LA9 4DQ

Email: developmentplans@southlakeland.gov.uk

Sent by Email only

Dear Sir / Madam,

## Arnside & Silverdale AONB Development Plan: Site Assessment Pro-forma

Thank you for consulting with the Home Builders Federation (HBF) on the site assessment pro-forma.

The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock.

The criteria included within the site assessment pro-forma are generally considered self-selecting. The distance criteria of 400m walking distance and 100m to services are, however, considered overly restrictive and in the opinion of the HBF should be increased. The existing criteria are also heavily weighted towards constraints, whilst this is an important part of site consideration it is important that the Council consider the opportunities that development may bring. For example it may meet a specific local need, provide community facilities, ensure existing facilities remain viable or provide essential infrastructure. The HBF consider that the inclusion of these additional criteria would provide greater balance to the assessment.

The assessment pro-forma does not provide any information to indicate how the various criteria they will be applied. It is recommended that the Council consider how it will apply each of the criteria and consider providing appropriate weighting to each. For example the weighting applied to a site being within flood zone 3 compared to being more than 400m from community facilities / transport route. The weighting of the relevant criteria will ensure that they are applied consistently and enable appropriate comparisons between sites to be made. It

is also possible that some of the constraints may be overcome, for example a new development currently more than 400m from a bus route may lead to a diversion of the route. In regard to weighting and consistency it is recommended that the Council consider the letter from the inspector of the Doncaster Sites and Policies DPD, dated 3<sup>rd</sup> June 2014.

I trust that the Council will find this response useful and I look forward to being consulted upon further iterations of this and other DPDs.

Yours sincerely,

MJ Good

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