

Planning Policy,
Development Services,
Allerdale Borough Council,
Allerdale House,
Workington, CA14 3YJ
siteallocations@allerdale.gov.uk

24 March 2017

Dear Sir / Madam,

Allerdale Local Plan (Part 2) Site Allocations

1. Thank you for consulting with the Home Builders Federation (HBF) on the Allerdale Local Plan (Part 2) Site Allocations.
2. The HBF is the principal representative body of the housebuilding 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.
3. We would like to submit the following comments to selected questions posed within the consultation document.

Question 1: Do you agree with the proposed approach to the distribution of housing growth between the Local Service Centres?

4. Policy SA1 seeks to distribute up to 20% of the housing requirement amongst the defined Local Service Centres in accordance with Core Strategy policy S3. The HBF does not wish to comment upon the proposed distribution. However, the wording of Policy SA1 identifies very prescriptive growth targets for each settlement. The policy also effectively places a moratorium on further housing development within these settlements, unless specific criteria are overcome, if and when the growth target is met. This approach is not considered to be wholly consistent with the Core Strategy policy or the NPPF requirements for plans to be positively prepared and respond flexibly to changing circumstances.
5. Draft policy SA1 seeks to deliver 1,030 dwellings this represents approximately 19% of the housing requirement. It must, however, be recognised that the housing requirement is set as a minimum and as such should not be seen as a cap upon development levels. Furthermore the 'up to 20%' identified within Core Strategy

policy S3 is across all of the Local Service Centres, it is therefore imperative this amount is delivered in full. Whilst the HBF would anticipate indicative levels of development for each settlement to be identified, based upon the criteria outlined on page 16 of the Preferred Options, the draft policy (SA1) provides very specific criteria with little or no flexibility should one or more of the settlements fail to deliver its quota of the housing requirement. This would inevitably impact upon the delivery of the overall plan housing requirement.

6. Despite a review of the available evidence it is also not clear how the specific targets for each settlement have been derived and whether surpassing these targets would have a detrimental impact upon the plan and the principals of sustainable development. For example would it harm the settlement of Dearham if 250 dwellings were delivered, rather than 230?

7. The HBF therefore recommends that only if there are clear justifiable constraints to the amount of development that a settlement can deliver should a cap be provided. In all other circumstances the figures should be indicative. To do otherwise would be placing an arbitrary cap upon development which would reduce flexibility within the plan.

8. I also draw the Councils attention to the Inspector's report of the East Riding of Yorkshire Local Plan who in considering similar 'caps' in Rural Service Villages and Primary Villages concluded;

"The Government's aim of boosting significantly the supply of housing is clear from the NPPF. The proposed 'caps' do the opposite. They deliberately suppress the level of housing that would otherwise be delivered through the consistent application of the broad approach to housing distribution chosen by the Council. In my view, they are a somewhat artificial device for which there is no robust or otherwise satisfactory justification." (paragraph 110, Inspector's report)

9. Furthermore it is unclear how the 'moratorium' mechanism would be invoked. The draft policy states that;

"...In circumstances where monitoring confirms that the required level of supply to meet the growth target for an individual Local Service Centre has been met, proposals for further housing development will be resisted..."

This appears to make the presumption that every application for a dwelling will be delivered within the plan period. This is unlikely to be the case and may lead to

otherwise sustainable applications being refused due to the fact that the potential level of supply has already been met. This is considered contrary to the NPPF.

10. Draft criterion 'a' also lacks clarity as to what would constitute "...very small-scale infill or rounding-off development...". In addition draft criterion 'b' appears to be based solely upon existing infrastructure and takes no account of potential new infrastructure provided by the development.

Question 3: Do you agree that the Council should include a policy to manage the release of allocated sites? Do you agree with the proposed approach?

11. No, the HBF does not support a managed release of the allocated sites. The proposed allocations are presumably considered sustainable by the Council. The sites are also required to meet the housing needs of the area over the plan period, as a minimum, in conformity with Core Strategy policy S3. The justification for micro-managing the supply by the Council is therefore considered inappropriate and contrary to national policy.

12. The Ministerial foreword in the NPPF states;
*"...Development that is sustainable should go ahead, **without delay** – a presumption in favour of sustainable development that is the basis for every plan, and every decision..."* (our emphasis).

This is also re-iterated in paragraph 15 of the NPPF. The HBF consider that the only reason a site should be phased should be dependent upon the provision of necessary facilitating infrastructure. The market itself will naturally phase sites based upon demand and need. Furthermore given that the Council is so far failing to meet its Core Strategy housing requirement it should be looking to maximise its supply early in the plan period.

13. The justification for placing sites into specific bands is also unclear, this is effectively interfering with the market and is likely to inhibit rather than promote development. Whilst the HBF does not recommend sites are banded if this can be justified by the Council it will also need to provide very clear and robust justification for the banding applied to each site.

14. In terms of the monitoring and release of sites in later bands, and the two proposed criteria, the Council will no doubt be aware of the delivery tests placed

upon Council's in the recent Government Housing White Paper¹. Whilst this element of the White Paper is the subject of consultation it is clear that the Government wants to see action as early as possible where a plan is deemed to be under-delivering. Therefore from November this year it is proposed that an action plan is required if delivery falls below 95% of the plan requirement. Based upon the Council's *July 2016 Five Year Housing Land Supply Statement* delivery is well below 95% and only just above 85%, as of March 2016, it is therefore likely that an action plan will be required.

15. Whilst the details and content of an action plan are as yet unknown it would appear likely that the Council will need to consider releasing additional sites. In this regard it appears unlikely that the Council can justify not releasing sites from later bands until; "A significant under delivery of housing within an individual locality" has occurred. It would appear, based upon the Government's stance, these sites will need to be released now. This further adds weight to our argument that the banding of sites is not justified or appropriate.

Question 4: Do you agree that the Council should identify reserve sites? Do you agree with the reserve sites proposed?

16. The HBF supports the principal of identifying reserve sites, this is in conformity with the NPPF requirement for plans to be flexible and deal with changing circumstances. We do, however, query whether the amount of reserve sites provides sufficient flexibility within the plan.
17. The reserve sites provide capacity for an additional 290 dwellings, or 5% of the overall minimum plan requirement. The HBF notes the recommendations from the report to Government of the Local Plan Expert Group, which recommended the provision of 20% of such sites. The HBF suggests that the Council consider increasing its 'pool' of reserve sites
18. In addition to the two triggers ('a' and 'b') identified in the draft policy, the Council, will also need to consider inclusion of the relevant delivery tests proposed to be placed upon Council's in the recent Government Housing White Paper, discussed against question 3 above.

¹ DCLG (2017): Fixing our broken housing market

19. We do not wish to comment upon the specific sites identified but it is essential that the sites identified are in themselves deliverable.

Question 5: Do you agree the revised threshold?

20. Yes, the HBF agrees with the revised threshold of 11 dwellings or more which conforms to current national policy.

Question 6: Do you agree with the new tenure mix?

21. The new tenure mix will also need to take account of the proposed changes to the definition of affordable housing suggested within the Housing White Paper as well as the proposal to seek a minimum of 10% of all homes on individual sites for affordable home ownership products. The White Paper is suggesting a transitional period for policy review, and seeks to bring the new proposals into force by April 2018.

22. Whilst it is recognised that the affordable housing target of 40% in Cocker mouth and 20% elsewhere is based upon viability evidence before the Core Strategy examination the Council will need to consider whether this evidence remains appropriate, given it is now 6 years old. The introduction of a new policy, even though similar to the old, will need justification.

Further information

23. The HBF wish to be kept informed of future consultations upon this and other development plan documents. We would also be happy to discuss any of the issues raised in this representation further prior to next stage of consultation on the document.

Yours sincerely,

MJ Good

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