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South Lakeland District Council
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SENT BY EMAIL
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13/02/2020

Dear Sir / Madam,

SOUTH LAKELAND STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT (SHLAA): CONSULTATION ON PROPOSED METHODOLOGY

Thank you for consulting with the Home Builders Federation on the South Lakeland Strategic Housing Land Availability Assessment proposed methodology document.

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. Our comments upon the main modifications are provided below.

Consultation and Engagement

Q1: The HBF consider that the Council should convene a panel comprising of homebuilders, landowners, agents, developers and other key stakeholders to inform the SHLAA process. However, consideration will still need to be given to views of others not chosen to be on the panel as appropriate.

Q2: The HBF would consider becoming members of the panel and could encourage our members with an interest in the area to join.

Q3: The HBF consider that the Council should consult on a draft SHLAA report.

Site Size Threshold

Q5: The HBF consider that the proposed site size threshold of 0.2 hectares or 5 dwellings is generally in line with the methodology set out in the PPG and is appropriate for South Lakeland.

Identification of Sites

Q8: The HBF consider that the Council should take into account the evidence that is required by the PPG in demonstrating a five-year supply (ID: 68-007) as part of the draft Call for Sites Background Information and Guidance note in Appendix 3.

Exclusion Criteria

Q9 & Q11: The HBF do not consider that all sites that are located within the Open Countryside and that are unrelated to existing principal, key or local service centres should automatically be excluded from the SHLAA assessment. Particularly as it is not clear how 'unrelated' would be determined for the purposes of the SHLAA, it may be that these sites are still appropriate for development and/or sustainability could be suitable or improved.

Initial Site Survey

Q13: The HBF consider that if insurmountable constraints or issues are identified and there is no evidence or information from any stakeholder to suggest these can be overcome or mitigated then it may be appropriate to exclude these sites from further consideration. However, the Council will need to keep this under review as circumstances may change and further information may become available over time.

Site Assessment

Q14: Whilst the proposed framework is generally acceptable, the assessment of sites is not always as clear cut as suggested by the assessment conclusions. It is considered that the Council may want to keep a note of where a site is close to meeting the potentially suitable or suitable criteria or where small changes to the site may improve the suitability. It is also recommended that the Council works closely with the homebuilding industry and other stakeholders to ensure that the assessment is appropriate and takes account of all of the information available.

Q15: The HBF would support the Council in following the guidance set out in the PPG in relation to availability, this will include contacting landowners to ensure that they are willing to sell their sites and are committed to seeing their land come forward for development.

Site Capacity

Q17 & 18: The HBF would recommend that the Council work closely with the homebuilding industry and other stakeholders to ensure that appropriate gross to net ratios and density assumptions are applied to each site. It is possible that as policy requirements at both a national and local level that the net developable areas and density assumptions will change, the Council should further consider whether the sites assessed have met recent and emerging requirements.

Windfall Assumption

Q21: The HBF do not consider that the SHLAA should factor in any allowance for windfall sites over 5 units.

Future Engagement

I trust that the Council will find these comments useful in preparing their SHLAA. I would be happy to discuss these issues in greater detail or assist in facilitating

discussions with the wider house building industry. Should you require any further clarification on the issues raised in this representation please contact me.

Yours sincerely,

A handwritten signature in cursive script, appearing to read 'Joanne Harding', written in black ink.

Joanne Harding

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