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Dear Julie Ward,

## **ALLERDALE LOCAL PLAN PART 2: MAIN MODIFICATIONS**

Thank you for consulting with the Home Builders Federation on the Allerdale Local Plan (Part 2) Site Allocations Document Main Modifications.

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.

### **MM3: Policy SA3: Affordable Housing**

The HBF generally support the amendments to Policy SA3 which see the inclusion of a variable affordable housing requirement of between 10% and 40% which reflects the limited viability of development in some areas.

### **MM4: Justification**

The HBF is generally supportive of the amendments to paragraph 55 which include text in relation to not undermining the overall viability of housing schemes.

The HBF is also generally supportive of the flexibility within paragraph 58 which states that the Council will consider a variation to the required tenure mix where there is evidence of a specific identified local need or site specifics, such as viability.

### **MM5: Policy SA5: Housing Standards**

The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, as stated previously the HBF does not consider that the Council has sufficient evidence to require all new homes to be designed and

constructed to meet the M4(2) standard. Therefore, the HBF consider that the proposed policy for developments of 10 or more units to provide 20% of dwellings to M4(2) standards is an improvement. The HBF also appreciate the addition of part (c) of the policy which includes sites where step-free access cannot be achieved.

**MM6: Justification**

The HBF also consider that the amendment to paragraph 74 is appropriate in relation to wheelchair adaptable dwellings.

**MM9: Policy SA7: Supporting Housing Development**

The HBF consider that it would be beneficial to have more clarity as to what information would be required as part of an assessment of evidence as to why the previous consent has not been implemented. It is considered that this information should not be overly onerous and should not cause further delay or issues with the delivery of these sites.

**MM32: Policy SA33: Broadband**

The HBF consider that the proposed amendments to Policy SA33 are an improvement and rightly looks for developers to engage with infrastructure providers rather than demonstrating that they can deliver.

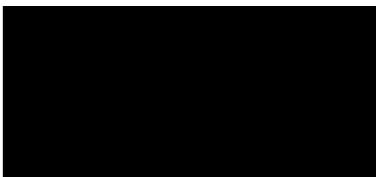
**Project Level Habitats Regulation Assessment (HRA)**

Whilst the HBF do not generally comment on individual sites, we have noticed a significant number of the modifications have included the requirement for Project Level HRA for site allocations. This seems like a subject matter where there may be better solutions than inserting the same requirement into a number of policies, particularly where the sites are already identified by the Council as allocations.

**Future Engagement**

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.

Yours sincerely,



**Joanne Harding**  
**Local Plans Manager – North**

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