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Our Reference:

Your Reference: 478

*Please ensure you quote Our Reference in all correspondence*

10<sup>th</sup> July 2019

Dear Kerry

***Allerdale Borough Council Local Plan (Part 2) Examination - Affordable Housing Policy SA3 and Housing Standards Policy SA5***

Thank you for consulting Story Homes on the proposed policy changes published by Allerdale Borough Council as ABC.16 Modifications for SA3 and SA5, ABC.17 Policy SA3 – Affordable Housing and ABC.18 Policy SA5 – Housing Standards. We offer the following comments:

**Policy SA3 – Affordable Housing**

We note the proposed changes to Policy SA3 – Affordable Housing and the proposed introduction of the zoning structure. In particular, it is important the policy recognises the flexibility required to negotiate the affordable provision on viability grounds where necessary.

**Policy SA5 – Housing Standards**

We are broadly supportive of the proposed changes to Policy SA5 – Housing Standards to reduce the requirement for all new housing to meet the requirements of M4(2) of the Optional Housing Standards and replace with 20% of dwellings for developments of 10 units or more. It is noted that the requirement of M4(3) of the Optional Housing Standards for 5% of dwellings on developments of 30 units or more remain unchanged.

We accept that Allerdale is experiencing an ageing population and support the need to address this. However, although the Council has undertaken more work to consider the viability of the proposed Housing Standards policy, it is still questionable as to whether the policy is supported by a robust local evidence base. For this reason, we support the reduction but challenge whether the proposed policy is justified.

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In addition, it is unclear from the 'Reason for modification' column in ABC.16 Modifications for SA3 and SA5 'Modifications proposed to Policies SA3 (Affordable Housing) and SA5 (Housing Standards)' exactly which elements of M4(3) the policy intends to require. The proposed policy wording is unclear in identifying exactly which elements of the M4(3) the policy is trying to secure.

The 'Reason for modification' states:

"To make it clear that the Council has chosen not to include the wheelchair accessible element of M4(3) standards at this time, only requiring 5% of units on schemes of 30 units or more are required to be wheelchair adaptable"

If this is the intention then the policy wording should be amended to clarify that the Council has chosen not to include the wheelchair accessible element of the M4(3) standards. The proposed policy wording is silent on this. One suggestion is that the policy wording could be amended as follows:

"...should be designed and constructed to meet optional Building Requirement M4(3)  
– ensuring that the dwellings are wheelchair adaptable **as a minimum**"

This would have the affect of confirming there is an expectation for at least the wheelchair adaptable element of the optional Building Requirement M4(3).

We remain committed to the delivery of housing in Allerdale and believe it is in the best interest of the Council, Development Industry and local community for the Plan to be found sound at the earliest opportunity.

Yours sincerely



Paul Fenton  
**Strategic Planner**