



THE HOME BUILDERS FEDERATION

Kerry Trueman,
Programme Officer,
Allerdale Borough Council,
Allerdale House,
Workington CA14 3YJ

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Email: kerry.trueman@allerdale.gov.uk

Sent by Email only

Dear Kerry,

Allerdale Local Plan (Part 1): Main Modifications

Thank you for consulting with the Home Builders Federation (HBF) on the Allerdale Local Plan (Part 1): Main Modifications.

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 HBF has already submitted comments upon some of the main modifications submitted by the Council prior to the examination. These comments were submitted as part of our hearing statement. In the interests of brevity these are not duplicated here.

Main Modifications not previously covered

The HBF would like to submit the following comments;

Main Modification MMX3 (Policy S8, page 62, paragraph 137)

The modification is considered unsound as it is not justified by the evidence.

The proposed modification indicates that the proposed level of affordable housing has been set taking account of the need and the available viability evidence. The HBF has consistently disputed the affordable housing requirement, both within our representations upon the Pre-Submission draft, dated 14th June 2013, and subsequent examination hearing statement dated 3rd January 2014.

The HBF would like to re-iterate that the Council's Housing Viability Studies as well as the May 2013 Cumulative Viability Topic Paper identify significant viability issues across Allerdale, particularly in the low market areas of Workington, Maryport and Wigton and do not justify the affordable housing contributions being sought.

The Allerdale Housing Viability Study (2011) indicates under current market conditions with affordable housing set at 20% only 8% of sites contained within the SHLAA would be viable with 81% being unviable. The Council's own evidence therefore suggests that the proposed affordable housing requirements will make the majority of development unviable and cannot therefore be justified as it is clearly contrary to the requirements of the NPPF.

The amendment also refer to previous completions of affordable housing. The Cumulative Viability Topic Paper update, October 2013 indicates that developments in low market areas have come forward and delivered affordable housing. Whilst this is encouraging it is noted that not all of the developments identified have been able to provide the 20% affordable housing required. The topic paper does not, however, provide any commentary upon how many sites have not come forward due to the overly ambitious affordable housing targets. The Council has a poor track record of overall housing delivery having failed to meet its housing requirement since at least 2003/4 (AMR 2011/12). The HBF therefore place little weight upon the identification of a few sites which have achieved the target given the overall poor performance across Allerdale. It should also be noted that the quoted permissions are based upon current policy requirements and take no account of the cumulative impact of proposed policies contained within the plan and the government's push towards zero carbon. A recent study by the Zero Carbon Hub (*Cost Analysis: Meeting the Zero Carbon Standard, Feb 2014*) indicates that the cost of achieving the government's ambitions for zero carbon homes for a detached home is likely to cost in the region of £6,700 to £7,500 above current 2013 Part L costs. This is a significant mandatory requirement for house builders and therefore should be considered in any viability assessment.

Given the Council's own evidence combined with the additional cumulative costs of plan policies and obligations and the government's push towards zero carbon the HBF contends that the affordable housing requirements across the whole of Allerdale are unjustified and will only serve to ensure that the district continues to under-perform against its housing requirement.

It is therefore recommended that the Council undertakes further viability work to assess the cumulative impacts of all policies and obligations in accordance with NPPF paragraphs 173 to 177 and sets its affordable housing requirement in light of this evidence. The affordable housing requirement should be set based upon the current economic conditions. If, in the future, viability across Allerdale improves sufficiently to request higher levels of affordable housing the Council can undertake a full or partial review of the plan to reflect this.

Main Modification MMX6 (Policy DM16, page 173, paragraph 386-387)

The proposed modification is unsound as it is not consistent with national policy.

Whilst the main modification attempts to 'water down' the previous plan requirement by indicating the sequential approach requiring previously developed windfall sites to be considered before green field sites will be 'light touch' there is no justification for this within the NPPF. Indeed the recent Secretary of State decision upon a section 78 appeal at Burgess Farm, Worsley, Manchester dated 16th July 2012 (APP/U4230/A/11/2157433) clearly sets out in paragraphs 14 and 17 that national planning policy in the Framework encourages the use of previously developed land (NPPF paragraph 17), but specifically does not promote a sequential approach to land use such as that advocated in policy DM16.

The policy would also create significant uncertainty and ambiguity over what constitutes a 'light touch' approach within this regard. Given this uncertainty and the clear message from central government, that a sequential approach is not appropriate, it is recommended that the policy and associated text be deleted.

Main Modifications covered by Hearing Statements

The following main modifications were covered within the hearing statements submitted by the HBF prior to examination. These have not been repeated here to minimise duplication. The HBF would, however, like to ensure that these comments are given due consideration as part of the consultation.

Main Modification MM1 (Introduction, Page 1, Paragraph 1) and **MM4** (Vision, Page 15, line 1)

Please refer to HBF Hearing Statement on Matter 2: The Extent of the Plan Period.

Main Modification MM12 (Policy S3, Page 25)

Please refer to HBF Hearing Statement on Matter 3: The scale of the Housing Requirement.

Main modifications MM17 (Policy S5, Page 33), **MM22** (Policy S6a, Housing, Page 36), **MM27** (Policy S6b, Housing, Page 40), **MM32** (Policy S6c, Housing, Page 44), **MM36** (Policy S6d, Housing, Page 48, 2nd bullet), **MM40** (Policy S6e, Housing, Page 52), **MM46** (Policy S6f, Housing, Page 56), **MM80** (Policy S30, page 122), **MM81** (Policy S30, page 122, Paragraph 288), **MM97** (Policy DM16, Page 173) and **MM98** (Policy DM16, Page 173, Paragraph 386-387)

Please refer to HBF Hearing Statement on Matter 15: The emphasis upon previously developed land.

Information

I would like to be informed of the following;

- Publication of the inspectors' recommendations

- Adoption of the Local Plan
- Other planning policy and Local Plan news

Yours sincerely,

MJ Good

Matthew Good
Planning Manager – Local Plans
Email: matthew.good@hbf.co.uk
Tel: 07972774229