

Planning Policy Team
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SENT BY EMAIL
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31 October 2025

Dear Planning Policy Team,

CUMBERLAND LOCAL PLAN: ISSUES AND OPTIONS CONSULTATION (SEPTEMBER 2025)

1. Thank you for consulting with the Home Builders Federation (HBF) on the Cumberland Local Plan (CLP) Issues and Options consultation.
2. 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 multinational 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.
3. The HBF has answered the relevant questions posed on the Response Form provided by the Council. This letter adds further detail to some of the responses which could not fit on the form. This is so as to assist the Council in its plan preparation. The HBF is keen to work with the Council to ensure that Cumberland produces a sound Local Plan which provides appropriate policies for the area.

Housing Need and Supply

4. The HBF considers that it is fundamental that the emerging CLP should plan to meet both market and affordable housing needs in full and that this should be front and centre of the Vision and Objectives of the Plan. This is made clear in paragraph 61 of the National Planning Policy Framework (NPPF, 2024), with paragraph 62 then outlining that this should be informed by the area's Local Housing Need (LHN) derived from the Standard Method. In the case of Cumberland, this currently equates to a minimum figure of 1,112 dwellings per annum (based on the most recent housing stock and affordability data).
5. As outlined on the response form, the HBF also requests that the Council fully examines whether there is a need for an uplift to the LHN because of requirements to provide a range and choice of sites, the need for flexibility, viability considerations, alignment of jobs and new homes, unmet need from neighbouring areas, and whether higher levels of open-market

housing are required to secure an increase in the delivery of affordable housing. The HBF expects all these aspects to be explored thoroughly through the Council's evidence base.

6. Alongside this, the HBF considers the Council will need to provide a robust and realistic housing trajectory which demonstrates a sufficient supply of new homes over the plan period and for the Council to demonstrate that it can achieve and maintain a five year supply of deliverable housing land across the lifetime of the CLP (in line with paragraph 78 of the NPPF).

Spatial Strategy

7. The HBF expects the CLP to be based on a logical settlement hierarchy that can meet the needs of the whole of Cumberland and all areas of the housing market. This should include an appropriate mix of both larger strategic allocations and smaller non-strategic allocations and consider both greenfield and brownfield sites. In particular, the CLP should, through its evidence base, seek to identify and allocate 10% of their housing requirement on sites no larger than one hectare (in line with paragraph 73 of the NPPF).

Optional Technical Standards

8. The Response Form asks whether standards above current building regulations should be sought through the CLP; in particular the introduction of M4(2) and M4(3) standards. The Council will be aware that such standards should only be included where there is clear and robust evidence for their introduction. The Planning Practice Guidance (PPG) identifies the type of evidence required to introduce such policies (Reference ID: 56-007-20150327). It is therefore incumbent on the Council to provide a local assessment evidencing the specific case for Cumberland which justifies the inclusion of optional higher standards for accessible and adaptable homes in the CLP. This is also the case for internal space standards and water efficiency standards. The HBF is keen to emphasise that these are not "nice to haves" but should only be introduced where they are fully justified by robust evidence and even then, they should only be introduced in accordance with the parameters set out in the PPG and not exceed these.
9. The HBF considers that currently, there is no evidence to support the introduction of standards above building regulations and so cannot support their inclusion.

Self-Build and Custom-Build

10. Whilst the Council may consider a policy for self-build and custom build-plots in the CLP, any such policies will need to be carefully considered and based on the appropriate evidence. The HBF does not consider that requiring a proportion of self and custom building on all new residential development schemes of more than a certain size is the correct approach. Instead, the HBF advocates for self and custom-build policies that encourage self and custom-build development by setting out where it will be supported in principle or by allocating small and medium scale sites specifically for this purpose.

11. It is considered unlikely that the provision of self and custom build plots on new housing developments can be coordinated with the development of a wider and larger site. At any one time, there are often multiple contractors and large machinery operating on-site from both a practical and health and safety perspective, it is difficult to envisage the development of single plots by individuals operating alongside this construction activity.
12. The HBF also notes that many self-builders would prefer not to be on a large residential development. Consequently, having vacant plots on development sites that may never come forward because of a lack of demand or suitability is clearly undesirable and would not accord with the NPPF's requirement to use development land efficiently (paragraph 129).

Biodiversity Net Gain (BNG)

13. The HBF notes the introduction of Biodiversity Net Gain (BNG) which came in for large sites on 12 February 2024, and for small sites from 2 April 2024. It is therefore important for the CLP to fully reflect the legislation and national policy and guidance. It should also be noted that the PPG is clear that there is no need for individual Local Plans to repeat national BNG guidance (Reference ID: 74-006-20240214).
14. It is the HBF's opinion that the Council should not deviate from the Government's requirement for 10% BNG as set out in the Environment Act. The Plan should provide certainty for developers and a clear BNG policy with a fixed 10% figure rather than seek anything over and above this. The Council will be aware that there are significant additional costs associated with BNG both on greenfield and brownfield sites, which should be fully accounted for in any future viability assessment of the CLP. The HBF would encourage the Council to ensure the CLP fully considers and evidences how BNG has formed part of the site selection process. This should include understanding the BNG requirement, including undertaking an assessment of the baseline to support allocations.
15. The HBF is aware, through its members, of the challenges of delivering new homes in Cumberland due to viability pressures. We therefore consider that going above the 10% BNG figure set out in the Environment Act could further undermine the ability of the Council to meet its housing requirement over the plan period and may have an impact on other policy requirements such as affordable housing or other planning obligations. The HBF therefore does not support the introduction of a policy which requires BNG in excess of 10%.

Future Engagement

16. We trust that the Council will find these comments useful as it progresses the CLP. We would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

17. The HBF would like to be kept informed of all forthcoming consultations on the CLP and associated documents. Please use the contact details provided below for future correspondence.

Yours faithfully

Chris Martin

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