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South Lakeland District Council
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SENT BY EMAIL
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14/12/2017

Dear Sir / Madam,

ARNSIDE & SILVERDALE AONB DPD PUBLICATION DRAFT (Reg 19)

Thank you for consulting with the Home Builders Federation on the Publication Draft of the Arnside and Silverdale AONB DPD.

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.

Policy AS03 – Housing Provision

This policy is not considered to be sound, as it is not considered to be effective.

This policy requires that proposals for new housing development will be supported where they deliver no less than 50% affordable housing. It goes on to state that only where this is demonstrably unachievable will a lower percentage be acceptable.

Whilst the HBF supports the delivery of affordable housing, the delivery of affordable housing must, however, be balanced against economic viability considerations. The HBF consider that the affordable housing requirement proposed is not viable and will hinder the delivery of both market and affordable housing if development cannot occur. The evidence contained within the Viability Study (October 2016) also highlights that the 50% affordable housing requirement is not viable, and that a number of sites are not viable even at the lower 35% level.

HBF propose that the policy is modified as follows:

- *Proposals for new housing development will be supported where they **contribute to the provision of** ~~deliver no less than 50%~~ affordable housing.*

~~Only where this is demonstrably unachievable will a lower percentage be acceptable.'~~

Future Engagement

I trust that both Councils will find these comments useful as they continue to progress the DPD for the AONB. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

I would like to be notified that the DPD has been submitted for independent examination. I would also like to express my interest in attending any relevant hearing sessions at the Examination in Public. Should you require any further clarification on the issues raised in this representation please contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Harding', with a stylized flourish at the end.

Joanne Harding

Local Plans Manager – North

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