

Planning Policy  
Development Services  
Allerdale Borough Council  
Allerdale House  
Workington  
CA14 3YJ

SENT BY EMAIL  
siteallocations@allerdale.gov.uk  
19/01/2018

Dear Sir / Madam,

### **ALLERDALE LOCAL PLAN: SITE ALLOCATIONS (Focused Consultation)**

Thank you for consulting with the Home Builders Federation on the Focused Consultation for the Allerdale Local Plan Site Allocations document.

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.

#### **Housing Standards**

*Question 1: Do you agree that the Council should introduce a Housing Standards policy?*

*Question 2: If a Housing Standards policy was introduced, is there a minimum development size to which it should be applied?*

In 2013, the Housing Standards Review (the Review) was launched which sought to simplify and rationalise the raft of housing standards which local authorities applied to development. At the heart of the Review was a desire to reduce developer costs and create attractive conditions to significantly boost housing delivery. The industry was heavily involved in the Review. The Government confirmed that the enhanced standards were intended to be optional and that they would only be needed and viable in certain local circumstances. Otherwise, they would have been made mandatory in Building Regulations across the country.

The Council propose to introduce a policy that requires a proportion of houses within a development to be built to category 2 (M4(2)) accessible and adaptable dwellings as defined in the Building Regulations.

The outcome of the Review was the establishment via Building Regulations of mandatory baseline standards which apply nationwide to all developments. The optional Building Regulations standards relating to accessibility can only be imposed through Local Plan policies where they are supported by appropriate evidence. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for Allerdale which justifies the inclusion of optional higher standards for accessible and adaptable homes. Whilst the SHMA may provide some of evidence, large elements such as the likely future need, impact on viability and adaptability of the existing stock need to be provided. Without appropriate evidence the HBF would not support the introduction of this policy.

### **Broadband for New Development**

*Question 3: Do you agree that there should be the introduction of a policy that requires new developments to have broadband connections?*

*Question 4: Should a policy be introduced, should there be a requirement for the provision of a minimum broadband speed?*

*Question 5: Should a policy be introduced, should there be a minimum development size that the policy should be applied to?*

The Council propose to introduce a policy requiring development proposals to: demonstrate early engagement with infrastructure providers; be accompanied by a 'Broadband Statement', make provision for superfast broadband; and for residential developments of 30 or more units to provide Fibre to the Premises.

The HBF generally consider that digital infrastructure is an important part of integrated development within an area. However, the inclusion of digital infrastructure such as high-speed broadband and fibre is not within the direct control of the development industry, and as such it is considered that this policy could create deliverability issues for development and developers. Service providers are the only ones who can confirm access to infrastructure. Whilst, paragraphs 43 to 46 of the NPPF establishes that local planning authorities should seek support the expansion of electronic communications networks it does not seek to prevent development that does not have access to such networks. The house building industry is fully aware of the benefits of having their homes connected to super-fast broadband and what their customers will demand.

The requirements of the policy in relation to a Broadband Statement setting out the current connectivity of the site and the potential for future provision may seem reasonable, however, the Council should be aware that some providers are no longer able to provide Connectivity Statements which may limit the information available to applicants and may again cause delay and limit deliverability.

The HBF consider that in seeking to provide broadband and fibre to homes the Council should work proactively with telecommunications providers to extend provision and not rely on the development industry to provide for such infrastructure.

**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.

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

Yours sincerely,

A handwritten signature in cursive script, appearing to read 'J. Harding', written in black ink.

**Joanne Harding**

**Local Plans Manager – North**

Email: [joanne.harding@hbf.co.uk](mailto:joanne.harding@hbf.co.uk)

Phone: 07972 774 229