

Planning Policy  
Eden District Council  
Mansion House  
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Penrith  
CA11 7YG

SENT BY EMAIL  
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22/01/2018

Dear Sir / Madam,

## **EDEN LOCAL PLAN: FURTHER MAIN MODIFICATIONS CONSULTATION**

Thank you for consulting with the Home Builders Federation on the Eden Local Plan Further Main Modifications consultation.

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.

### **FA01 – Policy LS1**

*The proposed modifications do not overcome our previous concerns with this policy, as such it is still considered to remain unsound as it is not justified.*

In relation to 'Key Hubs' the policy retains reference to sites which would increase the size of a village by more than 10% not normally being supported. The amendment clarifies this only relates to sites not included within the plan. Whilst the amendment is useful for purposes of clarification the HBF maintains that 10% is an arbitrary figure which has no regard to site or settlement characteristics, need or potential infrastructure benefits. This issue is further discussed within paragraphs 7 to 9 of our examination hearing statement (examination reference EL2.004).

In relation to Smaller, Villages and Hamlets the current policy wording effectively prioritises the re-use of previously developed land over and above greenfield sites, in terms of market housing, without consideration of the relative sustainability benefits or need for development. The HBF advocate that each site is viewed upon its merits and that such restrictions are not applied to either greenfield or previously developed land.

**FA04 – Policy LS2**

*The proposed modifications do not overcome our previous concerns with this policy, as such it is still considered to remain unsound as it is not adequately justified by the evidence.*

The HBF welcomes the increase in the housing requirement from 200dpa to 242dpa. This increase goes some way to addressing our previous concerns with the policy and overall Local Plan. We do, however, remain of the opinion that 242dpa remains below the full housing needs of the area. We remain of the opinion that this suppression in housing need is largely related to the methodology undertaken to identify the objectively assessed housing need (OAN) of Eden.

**FA15 – Policy HS1**

*The proposed amendments are not considered sound as they will not be effective.*

Whilst it is recognised this is not a change to the policy requirement, the HBF continues to have reservations regarding the requirement for 30% of all new dwellings to be affordable. This is considered in greater detail within our response to the submission version of the plan, dated 30th November 2015 (response ID109). The amendment to the threshold is, however, supported and is considered to confirm with current advice within the PPG.

Whilst the penultimate paragraph, relating to viability, is supported this should be expanded to include a relaxation of the local occupancy criteria. Which may equally impact upon viability. This will ensure that the policy is more effective.

**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 the publication of the Inspector's report and the adoption of the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



**Joanne Harding**

**Local Plans Manager – North**

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