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Dear Kerry Trueman,

## **ALLERDALE LOCAL PLAN PART 2: PROPOSED POLICY CHANGES SA3 & SA5**

Thank you for consulting with the Home Builders Federation on the Allerdale Local Plan (Part 2) Site Allocations Document Proposed Policy Changes to Affordable Housing Policy (SA3) and Housing Standards Policy (SA5).

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 SA3: Affordable Housing**

The HBF does not dispute the need for affordable housing within Allerdale and indeed supports the need to address the affordable housing requirements of the borough. The HBF appreciates the recognition that there was not the appropriate evidence, particularly in relation to viability, to support the previous policy requirement for 20% affordable housing across the Borough and the inclusion of a 10% requirement.

The HBF is generally supportive of the amendments to paragraph 30 which include text in relation to not undermining the overall viability of housing schemes.

The HBF is also generally supportive of the flexibility within paragraph 33 which states that the Council will consider a variation to the required tenure mix where there is evidence of a specific identified local need or site specifics, such as viability.

**Policy SA5: Housing Standards**

The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, as stated previously the HBF does not consider that the Council has sufficient evidence to require all new homes to be designed and constructed to meet the M4(2) standard. Therefore, the HBF consider that the proposed policy for developments of 10 or more units to provide 20% of dwellings to M4(2) standards is an improvement. The HBF also appreciate the addition of part (c) of the policy which includes sites where step-free access cannot be achieved.

The HBF also consider that the amendment to paragraph 49 is appropriate in relation to wheelchair adaptable dwellings.

**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.

Yours sincerely,



**Joanne Harding**

**Local Plans Manager – North**

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