

Regeneration and Planning
Planning and Housing Policy Team
Lancaster City Council
Lancaster Town Hall
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SENT BY EMAIL
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07/10/2019

Dear Sir / Madam,

LANCASTER LOCAL PLAN: MAIN MODIFICATIONS

Thank you for consulting with the Home Builders Federation on the Local Plan for Lancaster District.

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.

PART ONE: STRATEGIC POLICIES AND LAND ALLOCATIONS DPD

SPLA MOD_05: Policy SP6: The Delivery of New Homes

SPLA MOD_05 is not considered to be sound as it is not positively prepared for the following reasons:

The new paragraph after paragraph 9.19, new Table 9.1 and amendments to Policy SP6 introduce the stepped approach to the housing requirement. The HBF are concerned that this stepped approach will mean that there are potential households in need of homes that will be required to wait longer before homes are provided. The HBF consider this is a particular issue in light of the Council's own evidence which suggests that the OAN is in the order of 617dpa to meet the economic growth identified in the Review of the Employment Land Position for Lancaster District (RELPA) (baseline+ scenario). The OAN Verification Study continues to highlight that the demographic scenarios will not accommodate the level of jobs growth likely to occur and that there is a need for additional homes to be provided to meet the jobs growth. The HBF consider that the Council could have introduced more sites and

increased the variety in the sources of supply in order to bring forward housing sooner in the housing trajectory.

PART TWO: REVIEW OF THE DEVELOPMENT MANAGEMENT DPD

DM MOD_02: Policy DM2: Housing Standards

The HBF support the addition of text in relation to the viability of the scheme and the flexibility to be applied to the requirements of this policy.

It would, however, be useful if the justification provided more information about how this will work in practice, as it is not clear which of the policy requirements could take precedent in terms of any viability assessment and flexibility allowances.

DM MOD_03: Policy DM3: The Delivery of Affordable Housing

The HBF support the Council in setting affordability targets that reflect the viability evidence.

DM MOD_36: Policy DM59: Telecommunications and Broadband Improvements

The HBF support the amendment to Policy DM59 which reflects discussion at the Examination.

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 production of the Inspectors Report and the adoption of the Local Plan. Please use the contact details provided below for future correspondence.

Yours sincerely,



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