

Ms Carmel Edwards  
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Dear Ms Carmel Edwards,

**LAKE DISTRICT NATIONAL PARK LOCAL PLAN: INSPECTOR'S MATTERS,  
ISSUES AND QUESTIONS**

Thank you for consulting with the Home Builders Federation on the Lake District National Park Local Plan Examination Inspector's Matters, Issues and Questions.

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.

The HBF would like to submit the following comments on selected questions posed within the Inspector's Matters, Issues and Questions.

Yours sincerely,



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**Main Matter 6 – Is the approach to assessing housing need robust and is the housing requirement figure justified and consistent with national guidance? Will the Plan provide for a choice and mix of housing to meet the needs of different groups in the community?**

*Relevant Policy – Policy 15*

*Context – The Planning Practice Guidance (PPG) indicates that the standard methodology is not to be used to assess local housing need in National Parks and that a housing need figure should be identified using a locally determined method and using the best available information on changes in households and local affordability levels.*

**1 The Edge Analytics Demographic Update (SD401) sets out three demographic scenarios using variant assumptions on migration – why has the ‘dwelling led’ scenario been selected to inform the Plan’s housing requirement in preference to the demographic scenarios?**

The HBF consider that this question is for the Council to answer. However, the HBF support the selection of the ‘dwelling led’ scenario rather than the demographic scenarios as the HBF consider that the other scenarios would result in further decline in the population.

**2 How have the Allerdale, South Lakeland, Eden and Copeland Strategic Housing Market Assessments (SHMAs) (SD230 & 230a, SD3231, SD232 & SD233) informed consideration of the level of housing needs and do they form an appropriate starting point for assessing need in the National Park?**

The HBF consider that these SHMAs form an appropriate starting point for assessing the housing need within the National Park. This is considered generally in line with PPG (ID: 2a-014) which states that where that data required for the model are no available such as National Parks, an alternative approach will have to be used. It goes on to state that they will need to consider the best available information on anticipated changes in households as well as local affordability levels.

However, it should be noted that the PPG (ID: 2a-015) does go on to state that consideration will be given to whether the different method used provides the basis for a plan that is positively prepared, taking into account the information available on household formation and affordability. Therefore, there may be a case for further information to be collated in order to ensure that the Plan is positively prepared and meets the housing needs of the area.

**3 Do the SHMAs include an assessment of ‘market’ need as well as affordable need?**

The Local Housing Needs Assessments (Mar 2018 & Jan 2019) do not set out any assessment of market need from the SHMAs identified. It is not apparent from the SHMAs that any assessment of market need has been undertaken for the Lake District National Park. Without this information it is difficult to determine if local housing need is being met or whether the housing requirement is appropriate, and whether it provides the basis for a plan that is positively prepared. It is also therefore not apparent if the plan is in line with the NPPF which states that ‘strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need

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*(and any needs that cannot be met within neighbouring areas) can be met over the plan period'.*

**4 Are the assumptions made in relation to the following factors reasonable and justified:**

- **Migration;**
- **Household formation; and**
- **Vacancy rates**

The HBF do not wish to comment on this question at this time.

**5 Has the scale and distribution of site allocations been informed by the level of need for the Housing Market Areas identified in the SHMAs?**

The HBF would expect the provision of new residential development of sites to be in line with the spatial strategy and the housing need, we would also expect the spatial distribution of sites to follow a logical hierarchy, provide an appropriate development pattern and support sustainable development within all market areas.

**6 Is the housing requirement of 1200 dwellings (80 dwellings per year) in Policy 15 justified when the Local Housing Need Assessment (2019) (SD225) identifies a need for 113 affordable dwellings per year?**

The HBF are concerned that the proposed housing requirement will not see the affordable housing need met within the Lake District National Park.

**7 What is the up to date position in terms of the assessment of need for Gypsy and Travellers and travelling showpeople?**

The HBF do not wish to comment on this question at this time.

**Issue: Choice and mix of housing and affordable housing**

**8 Is the approach in Policy 15 to restrict up to five dwellings to permanent local occupancy justified? How has the threshold been arrived at?**

Part 2 of the policy and Paragraph 3.15.15 state that on windfall sites and allocated sites capable of delivering more than five dwellings, the first five dwellings will be subject to a local occupancy condition and anything above that number will be on-site affordable housing reflecting the local community need.

It is not clear how the threshold of five dwellings has been arrived at. It is also not apparent from the Plan what the justification is for the permanent local occupancy and the HBF would seek assurances from the Council that this will not be an impediment to the effective delivery of homes.

**9 Is the threshold above which dwellings will be expected to be provided as affordable housing justified and based on a robust assessment of economic viability? Why has the threshold been 'raised' from the current figure of 3 as set out in Policy 18 of the Core Strategy (SD600) to 5 and what evidence justifies this?**

There is limited information available within the Viability Assessment, and it is not apparent what modelling has been undertaken to determine that the affordable housing requirement is deliverable. PPG (23b-004) states that policies should be informed by evidence of affordable

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housing need, and a proportionate assessment of viability. It is not considered that the Viability Assessment is proportionate and sufficient to determine if the proposed policy is justified.

Paragraph 34 of the NPPF states that Plans should set out the contributions expected from development including the levels of affordable housing, it goes on to state that such proposals should not undermine the deliverability of the plan. Without appropriate evidence it is not possible to determine if the plan is viable and deliverable.

***10 On developments of 6 or more dwellings, would affordable housing be provided on site or as a commuted sum? Does Policy 15 provide sufficient guidance in this regard?***

Paragraph 3.15.15 suggests that the additional homes will be expected to be provided on-site, this does not appear to be set out in the actual policy.

***11 What mechanisms will be used to secure and deliver permanent local occupancy and how will it be monitored?***

The HBF do not wish to comment on this question at this time.

***12 Has Policy 15 been positively prepared to meet the housing needs of different groups having regard to the findings of the SHMAs, including the need for accessible and adaptable homes and extra care accommodation?***

The PPG (63-006) states that authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. However, the HBF do not consider that the Council have appropriate evidence to introduce any of the optional standards in relation to accessible and adaptable homes (M4(2) or M4(3) standards), PPG (56-007) sets out a selection of potential evidence that the Council can use to introduce these standards, including the likely future need for housing for older and disabled people; the size, location, type and quality of dwellings needed to meet specifically evidenced needs; the accessibility and adaptability of the existing stock; how needs vary across different housing tenures and the overall impact on viability.

***13 Should Policy 15 make provision for market housing on rural exception sites where it could facilitate the delivery of affordable housing, as set out in paragraph 77 of the NPPF? What is the evidence in relation to the viability of rural exception sites?***

The NPPF states that Councils should consider whether allowing some market housing on rural exception sites would help to facilitate the provision of affordable housing to meet identified local needs. It is not apparent if the Council has given consideration to whether this would be beneficial or appropriate in the National Park.

***14 Does Policy 15 set out appropriate and clear criteria for the assessment of planning applications for Gypsy, Traveller and travelling showpeople's sites that may come forward in the plan period?***

The HBF do not wish to comment on this question at this time.

***15 Should any of the matters within the draft Housing SPD be included within Policy 15?***

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The HBF do not wish to comment on this question at this time.

## **Main Matter 11 - Is the housing requirement deliverable over the Plan period and will there be a 5 year supply of specific deliverable housing sites on adoption?**

*Relevant Policies – Policy 15 and Figure 10.*

*Note – the NPA has produced a revised housing trajectory in its Response to the Inspectors 6.9.19 (LDNPA-003).*

### **1 What is the 5 year requirement for the relevant period on adoption of the Plan?**

The HBF would assume that the five year requirement is 400 dwellings.

### **2 Where is the NPA's approach to the calculation of 5 year land supply set out in the Plan and evidence documents?**

The HBF have assumed this is a question for the NPA to respond to, but would appreciate clarity on the NPA's approach to the five year supply. PPG states that in plan-making strategic policies should identify a five year housing land supply from the intended date of adoption of the plan. The PPG also provides details on the evidence required to demonstrate the deliverability of sites included within the five year supply.

### **3 What is the estimated supply in the Plan period 2020-2035 from:**

- **Sites with planning permission for 10 or more dwellings (large sites)**
- **Sites with planning permission for less than 10 dwellings (small sites)**
- **Site allocations in the Plan**
- **Windfall sites?**

The HBF would appreciate a more information in relation to the potential supply, particularly in light of the requirements within the NPPF and PPG in relation to deliverable and developable sites.

### **4 Are the assumptions about dwellings on windfall sites justified and are there any policy changes which could change the rate of delivery in the future compared with historical rates?**

The HBF do not wish to comment on this question at this time.

### **5 Based on a requirement of 80 dwellings per year, would the Plan help to ensure a 5 year supply of deliverable sites over the Plan period? What evidence outlines the position in relation to 5 year supply?**

The HBF are not aware of the Council having provided further evidence on the five year housing land supply to support the deliverability of sites included. Particularly in light of the requirements from the PPG which states that evidence for including sites within the five year supply could include current planning status (e.g. how much progress has been made towards a reserved or full planning application, or discharge of conditions); a written agreement between the local planning authority and the site developer setting out the developers delivery intentions; firm progress with site assessment work; or clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.

## **Main Matter 14 – Whether or not the Plan would be viable and deliverable within the Plan period and whether the arrangements for monitoring are robust**

### ***1 Would new development be able to accommodate the Plan's policy requirements having regard to viability and is this supported by the evidence in the Viability Study (SD229)?***

It is not apparent from the Viability Assessment whether new development would be able to accommodate the Plan's policy requirements. Whilst the Viability Assessment sets out potential cost implications from policy requirements, there is no financial details included within the report, and the two case studies that have been undertaken are not provided within the report.

PPG sets out the standardised inputs and principles for carrying out a viability assessment. It states that viability assessment is a process of assessing whether a site is financially viable, by looking at whether the value generated by a development is more than the cost of developing it. This includes looking at the key elements of gross development value, costs, land value, landowner premium, and developer return. It goes on to state that the assessment should be proportionate, simple, transparent and publicly available. At present it is not considered that the Viability Assessment as provided by the National Park meets the requirements set out in the PPG.

### ***2 Will the monitoring framework provide a robust basis for assessing Plan outcomes and are the indicators, targets and triggers appropriate?***

The HBF consider that the monitoring framework could be improved by incorporating trigger points at which action will be taken, for example if the number of homes completed does not achieve 80 per annum, will any action be taken, how many years would the target have to be missed before action was taken. It may also be useful to consider what action would be taken, for example if a trigger and action were identified in relation to the number of homes granted permission this could mean that the NPA could have addressed this issue through actions before it meant that homes were not delivered.

### ***3 Does the Plan have sufficient flexibility to respond to changing circumstances?***

The HBF do not wish to comment on this question at this time.