

Development Strategy Team  
Blaby District Council  
Council Offices  
Desford Road  
Narborough  
Leicester  
LE19 2EP

SENT BY E-MAIL ONLY TO  
[planning.policy@blaby.gov.uk](mailto:planning.policy@blaby.gov.uk)

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Dear Sir / Madam

## **BLABY NEW LOCAL PLAN - OPTIONS CONSULTATION**

### **Introduction**

Thank you for consulting with the Home Builders Federation (HBF) on the above-mentioned 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. We would like to submit the following responses to specific questions contained within the Council's Options consultation documentation.

### **Q2. Do you consider that Blaby District meet only its own employment needs or contribute to meeting the needs of other areas in Leicester and Leicestershire?**

If the Council is to achieve Strategic Objective 11 of providing an appropriate quantity, quality and mix of land for employment uses to support a diverse range of business needs and of providing training / job opportunities for current and future populations, the Council must continue to work with the other Leicester and Leicestershire (L&L) authorities to determine the distribution of Leicester's unmet employment land needs, the distribution of large-scale Strategic Warehousing & Logistics sites across the L&L Functional Economic Market Area (FEMA) and the employment implications of a Strategic Rail Freight Interchange close to M69 J2. A Statement of Common Ground (SoCG) should be agreed on these matters.

The Council should seek to increase its competitive advantage whilst working collaboratively with neighbouring authorities in the L&LFEMA. Blaby District is well located to attract businesses because of its strategic location close to the M1 and the advantages of access to the wider Strategic Road Network. In the L&L Strategic Growth Plan (SGP) five key growth areas are identified of which Leicester Our Central City, the A46 Priority Growth Corridor and the A5



Improvement Corridor are relevant to Blaby. As set out in the 2019 National Planning Policy Framework (NPPF) to achieve sustainable development, overarching economic and social objectives should be pursued in mutually supportive ways (para 8). The positive and proactive encouragement of sustainable economic growth should address potential barriers to investment such as inadequate housing (paras 81a & 81c). There should be a balance between jobs and homes. If the Council is seeking to maintain and even strengthen its sub-regional employment role then the opportunity for more housing growth should be considered to support the economic growth ambitions of the L&LSGP.

The National Planning Practice Guidance (NPPG) clearly states that the Government's standard methodology for calculating Local Housing Needs (LHN) is the minimum starting point in determining the number of homes needed. (339 dwellings per annum) It does not produce a housing requirement figure (ID 2a-010-20190220). The NPPG explains that "circumstances" may exist to justify a figure higher than the minimum LHN (ID 2a-010-20190220). The "circumstances" for increasing the minimum LHN are listed in the NPPG including, but not limited to, situations where increases in housing need are likely to exceed past trends because of growth strategies, strategic infrastructure improvements, agreeing to meet unmet need from neighbouring authorities or previous levels of housing delivery / assessments of need, which are significantly greater than the outcome from the standard methodology (ID: 2a-010-20190220). In Blaby, the Council's ambition to increase its competitive economic advantage is justification for a housing requirement above the minimum LHN. A lack of labour should not become a constraint on realising the economic growth potential of the District. The Council should seek to achieve a sustainable balance between employment and housing growth.

The Council should also recognise economic benefits of housing development in supporting local communities as highlighted by the HBF's latest publication Building Communities – Making Place A Home (Autumn 2020). The Housing Calculator (available on the HBF website) based on The Economic Footprint of House Building (July 2018) commissioned by the HBF estimates for every one additional house built in Blaby, the benefits for the local community include creation of 3 jobs (direct & indirect employment), financial contributions of £27,754 towards affordable housing, £806 towards education, £297 towards open space / leisure, £1,129 extra in Council tax and £26,339 spent in local shops.

#### **Q4. Do you consider that the Locational Strategy should include Strategic Sites where there are higher levels of growth?**

The new Local Plan's Locational Strategy as set out in its strategic policies should ensure the availability of a sufficient supply of deliverable and developable land to deliver a housing requirement, which meets the District's housing needs and assists in meeting unmet housing needs from Leicester city. Leicester City has declared an unmet housing need. The Draft Leicester Local Plan confirmed an unmet need of circa 7,800 dwellings up to 2036. The

publication of the Government's Indicative Revised Housing Methodology (December 2020) results in an uplift to the housing need in Leicester City of approximately 35%, which means in addition to the confirmed unmet need a further unmet need of circa 10,000 dwellings. The L&LSGP (approved in 2018) indicates that a significant proportion of Leicester's unmet need should be accommodated in Blaby District.

As the Council will be planning for a housing requirement above the minimum LHN, the Locational Strategy should include Strategic Sites (sites over 1,000 dwellings). The HBF understand that four Strategic Sites have been submitted to the Council for consideration. These are :-

- Whetstone Pastures (estimated between 3,500 to 6000 homes) ;
- Land west of Stoney Stanton (estimated 5,000 homes) ;
- Land at Hospital Lane, Blaby (estimated 1,018 homes) ; and
- Land north of railway line, Elmesthorpe (estimated 1,100 homes).

The HBF have no comments on individual sites proposed for allocation as Strategic Sites. Long lead in times for the commencement of on-site development and build up to optimum delivery rates are associated with Strategic Sites. Such Strategic Sites should be considered over a long timeframe, which may extend beyond the proposed plan period of the Local Plan. It is critical that the Council's assumptions on lead in times and delivery rates are correct and realistic. These assumptions should be supported by parties responsible for delivery of housing.

The Council's Housing Land Supply (HLS) should provide a sufficient supply of land to meet the housing requirement, to ensure the maintenance of a 5 Year Housing Land Supply (YHLS) and to achieve Housing Delivery Test (HDT) performance measurements.

**Q5. Do you consider that a range of smaller and medium sites located across a settlement hierarchy will also be needed to ensure the delivery of the total housing requirement?**

If the Council is to achieve Strategic Objective 12 to sustain a vibrant rural economy and to support rural communities by retaining existing, and where possible provide new, services and facilities, then non-strategic sites as well as Strategic Sites should be identified. The Council should identify a range of small and medium sized sites located across the Settlement Hierarchy.

There should be a short and long-term supply of sites on brownfield and greenfield land. Housing delivery is maximised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector. The widest possible range of housing sites by both size and market locations should be sought to provide suitable land for small local, medium regional and large national housebuilding companies. A diversified portfolio of housing sites offers the

widest possible range of products to households to access different types of dwellings to meet their housing needs.

Housing growth is proposed in accordance with the Settlement Hierarchy. The proposed Settlement Hierarchy groups settlements according to the level of local services, access to public transport and access to employment opportunities. The proposed five-tiered Settlement Hierarchy is :-

- Principal Urban Area (Braunstone Town, Glenfield, Glen Parva, Kirby Muxloe Leicester Forest East, Lubbethorpe) ;
- Extended Principal Urban Area (Blaby, Countesthorpe, Enderby, Narborough, Whetstone) ;
- Medium Villages (Stoney Stanton, Cosby, Croft, Huncote, Littlethorpe, Sapcote) ;
- Smaller Villages (Elmesthorpe, Kilby, Sharnford, Thurlaston) ; and
- Hamlets (Aston Flamville, Leicester Forest West, Potters Marston, Wigston Parva).

At this stage of plan preparation, the Council recognises that Green Wedge, Area of Separation and Countryside designations will be subject to review and so will not prevent consideration of development sites for allocation in these locations.

**Q6: How should we diversify the housing market in the District to meet the requirement to provide more housing on smaller sites (less than one hectare in size)?**

As set out in the 2019 NPPF at least 10% of the housing requirement should be accommodated on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 68a). The Council should confirm that this national policy requirement will be achieved.

**Q7: If you have promoted a site for development and it is considered a reasonable option in the Council's site assessment work, would you consider sub-dividing the site to allow small and medium house-builders or self-builders to enter the housing market?**

The sub-division of larger housing development sites adds to the complexity and logistics of developing such sites. It is particularly difficult to co-ordinate from a practical and health & safety perspective, the provision of plots for self-builders with the development of the wider site, where at any one time, there are multiple contractors and large machinery operating on-site. Any differential between the lead-in times / build out rates of self-builders and the development of the wider site resulting in unfinished plots next to completed and occupied dwellings means customer dissatisfaction, construction work outside of specified working hours, building materials stored outside of designated compound areas, etc. It is also important that undeveloped plots are not left empty to the detriment of neighbouring properties or the whole development.

As well as on-site practicalities any adverse impacts on viability should be tested (also see HBF answer to Q32). The Council's updated viability assessment should acknowledge that sub-division of larger housing sites has a fundamental bearing on the development economics of the scheme. Cost implications include (but not an exhaustive list) :-

- up front site promotion costs, including planning and acquisition costs are unlikely to be recouped ;
- other costs including site externals, site overheads, and enabling infrastructure costs are fixed costs ;
- the profit otherwise obtainable if houses were built and sold on by the original site developer is foregone ; and
- the additional costs of disruption caused by returning to undeveloped self-build plots for construction out of sequence with the build programme of the wider site.

**Q8. What do you think about the proposed policy approach to urban design quality and place-making?**

The Council's proposed policy approach to urban design quality and place-making should accord with the 2019 NPPF, the latest NPPG, the National Design Guide and National Model Design Code. The Council's policy approach should provide specific local guidance rather than repeating national policy or guidance.

The use of best practice guidance like Building for a Healthy Life should remain voluntary rather than becoming a mandatory policy requirement, which could be signposted in supporting text. Any referencing in policy wording to design guidance contained in a Supplementary Planning Document (SPD) should not convey development plan status onto a document which has not been subject to the same process of preparation, consultation and Examination contrary to the Town and Country Planning (Local Planning) (England) Regulations 2012 (Regulations).

**Q9. What do you think about the proposed policy approach to mitigating and adapting to climate change?**

The Council's Strategic Objective 4 supports the move to a low carbon future and cutting carbon emissions by embedding consideration of climate change into the Local Plan.

The 2019 NPPF confirms that Local Plans should avoid unnecessary duplication (para 16f). The Government's Planning for the Future White Paper also states that a simpler planning process improves certainty. In this context, the Council is referred to the Government's proposed changes to the Building Regulations Part L (Conservation of Fuel & Power), Part F (Ventilation), Part M (Access to & Use of Buildings), Part R (Physical Infrastructure for High-Speed Electronic Communications Networks) & Part S (Electric Vehicle Charging in Residential & Non-residential Buildings) and the Government's proposals for

biodiversity gain set out in the Environment Bill. It is the HBF's opinion that the Council should not be setting different targets or policies outside of Building Regulations or the Environment Bill.

Today's new homes are already very energy efficient with lower heating bills for residents in comparison to older existing homes. Energy performance data has shown that around 8 out of 10 new build dwellings have an A or B energy efficiency rating, compared to just 3% of existing properties. An HBF report published in November 2019 found that, as a result, the average new build buyer in England and Wales saves £442.32 every year on heating costs compared to owners of existing dwellings.

As set out in The Future Homes Standard consultation (ended on 7<sup>th</sup> February 2020), the Government intends to future proof new homes with low carbon heating and world-leading levels of energy efficiency by uplifting standards for Part L (Conservation of Fuel & Power) and changing Part F (Ventilation) of the Building Regulations. The HBF recognise and support the need to move to The Future Homes Standard but there are difficulties and risks to housing delivery given the immaturity of the supply chain for the production / installation of heat pumps and the additional load that would be placed on local electricity networks in combination with Government proposals for the installation of electric vehicle charging points (EVCP) in new homes.

The Government Response to The Future Homes Standard : 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings dated January 2021 provides an implementation roadmap, the Government's aim is for the interim Part L (Conservation of fuel and power), Part F (Ventilation) & Overheating Regulations to be regulated for in late 2021 and to come into effect in 2022. The 2021 interim uplift will deliver homes that are expected to produce 31% less CO<sub>2</sub> emissions compared to current standards. To ensure as many homes as possible are built in line with new energy efficiency standards, transitional arrangements will apply to individual homes rather than an entire development and the transitional period will be one year. This approach will support successful implementation of the 2021 interim uplift and the wider implementation timeline for the Future Homes Standard from 2025.

The Future Homes Standard will ensure that new homes will produce at least 75% lower CO<sub>2</sub> emissions than one built to current energy efficiency requirements. By delivering carbon reductions through the fabric and building services in a home rather than relying on wider carbon offsetting, the Future Homes Standard will ensure new homes have a smaller carbon footprint than any previous Government policy. In addition, this footprint will continue to reduce over time as the electricity grid decarbonises.

The HBF support moving towards greater energy efficiency via a nationally consistent set of standards and timetable, which is universally understood and technically implementable. The Government Response to The Future Homes Standard consultation confirms that the Planning and Energy Act 2008 will not be amended, which means that the Council will retain powers to set local energy

efficiency standards for new homes. The HBF acknowledges that the Council may stipulate energy performance standards that exceed the Building Regulations but consider that the Council should comply with the Government's intention of setting standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of individual Council's specifying their own policy approach to energy efficiency, which would undermine economies of scale for product manufacturers, suppliers and developers. The higher levels of energy efficiency standards for new homes proposed in the 2021 Part L uplift and Future Homes Standard means that the Council should not need to set local energy efficiency standards in order to achieve the shared net zero goal.

Furthermore, the Council's policy approach should not compromise the viability of development (also see HBF answer to Q32). The Council's updated viability assessment should include additional costs for 2021 Part L uplift. The Government's estimated cost is £4,847 per dwelling.

**Q11. What do you think about the proposed policy approach to biodiversity and geodiversity?**

The Council's policy approach to biodiversity gain should not deviate from the Government's proposals on biodiversity gain as set out in the Environment Bill. This legislation will require development to achieve a 10% gain for biodiversity. It is the Government's opinion that 10% strikes the right balance between the ambition for development and reversing environmental decline. 10% gain provides certainty in achieving environmental outcomes, deliverability of development and costs for developers. 10% will be a mandatory national requirement, but it is not a cap on the aspirations of developers who want to voluntarily go further. The mandatory requirement offers developers a level playing field nationally and reduced risks of unexpected costs and delays.

The Council's policy approach should also reflect the Government's proposals for a transition period of two years as set out in the Environment Bill. The Government proposes to work with stakeholders on the specifics of this transition period, including accounting for sites with outline planning permission, in order to provide clear and timely guidance on understanding what will be required and when.

There are significant additional costs associated with biodiversity gain, which should be fully accounted for in the Council's updated viability assessment (also see HBF answer to Q32). The Government has confirmed that more work needs to be undertaken to address viability concerns raised by the housebuilding industry in order that net gain does not prevent, delay or reduce housing delivery. The DEFRA Biodiversity Net Gain & Local Nature Recovery Strategies : Impact Assessment Table 14 : Net Gain Delivery Costs (Residential) sets out regional costs (based on 2017 prices) in East Midlands of £19,951 per hectare of development based on a central estimate but there are significant increases in costs to £69,522 per hectare for off-site delivery

under Scenario C. There may also be an impact on gross / net site acreage ratio, which should be considered in the Council's updated viability assessment.

**Q14. How can the Local Plan best assist in the delivery of healthy communities?**

The Council is referred to the HBF's answer to Q15 below.

**Q15. What specific health-related requirements would you wish to incorporate in the Local Plan and its policies?**

The NPPG confirms that a HIA can serve a useful purpose at planning application stage and consultation with the Director of Public Health as part of the process can establish whether a HIA would be a useful tool for understanding the potential impacts upon wellbeing that development proposals will have on existing health services and facilities (ID 53-004-20140306). Any requirement for a HIA should be based on a proportionate level of detail in relation the scale and type of development proposed. The requirement for HIA without any specific evidence that an individual scheme is likely to have a significant impact upon the health and wellbeing of the local population is not justified by reference to the NPPG. Only if a significant adverse impact on health and wellbeing is identified should a HIA be required, which sets out measures to mitigate the impact.

**Q19. What do you think about the proposed policy approach to affordable housing?**

The Council's Strategic Objective 3 aims to provide a range of housing tenures to meet the needs of different groups including those with affordable housing needs. The NPPG sets out that households whose needs are not met by the market, which are eligible for one or more of the types of affordable housing set out in the definition of affordable housing in Annex 2 of the 2019 NPPF, are considered in need of affordable housing (ID 67-005-20190722). The Council should calculate its affordable housing need as defined by the NPPG. This figure may be significant in comparison to the minimum LHN. Total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments. As set out in the NPPG, an increase in the total housing figures may be considered where it could help deliver affordable housing (ID 2a-024-20190220). It is acknowledged that the Council may not be able to meet all affordable housing needs but a housing requirement above the minimum LHN will make a greater contribution to delivering more affordable housing.

The Council's affordable housing tenure mix should be consistent with the 2019 NPPF, which promotes affordable home ownership by requiring at least 10% of new dwellings built to be available for this tenure leaving only the remainder for other affordable housing tenures (para 64). The Government's Changes to the Current Planning System (ended on 1st October 2020) and The Government's



consultation on Draft Revisions to the NPPF (ending on 27th March 2021) also propose further changes to delivering First Homes.

Any proposed policy modification of site thresholds from 15 or more dwellings and / or the percentage of affordable housing provision (currently 25% in the adopted Local Plan) should be fully justified by updated evidence. As set out in the 2019 NPPF, all policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31).

Any proposed policy modification to site thresholds and / or the percentage of affordable housing provision should also be viability tested (also see HBF answer to Q32). As set out in the 2019 NPPF, the contributions expected from development including the level & types of affordable housing provision required and other infrastructure should be set out in the Local Plan (para 34). The viability of individual developments and plan policies should be tested at the plan making stage. As stated in the 2019 NPPF, development should not be subject to such a scale of obligations that the deliverability of the Local Plan is threatened (para 34).

**Q20. What do you think about the proposed policy approach to the mix of housing?**

The Council's Strategic Objective 3 aims to provide a range of housing types and sizes to meet the needs of different groups including older persons and specialist housing needs.

All households should have access to different types of dwellings to meet their housing needs. As set out in 2019 NPPF, the housing needs for different groups should be assessed to justify any policies on the size, type and tenure of housing including a need for affordable housing (paras 61 & 62). All policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). The Council's policy approach should be flexible allowing the market to determine the mix of type and size of housing based on evidence of housing needs. An overly prescriptive policy approach to types and sizes of housing is inappropriate.

When planning for an acceptable mix of dwellings types to meet people's housing needs, the Council should ensure that appropriate sites are allocated to meet the housing needs of specifically identified groups rather than seeking an overly prescriptive housing mix on individual sites. The new Local Plan should ensure that suitable sites are available for a wide range of different types of development across a wide choice of appropriate locations.

**Q21. What do you think about the proposed policy approach to older persons and specialist housing**

The Council's policy approach should accord with the latest NPPG on the needs of an ageing population (ID 63-001-20190626 to 63-019-20190626).

Any proposed requirement for inclusion of homes for older people and specialist needs (bungalows, retirement, sheltered, extra care, registered care and other specialist housing) on larger residential development sites should be justified by robust evidence of local need. As set out in the 2019 NPPF, all policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31).

The Council's policy approach to the inclusion of homes for older people and specialist needs should not compromise the viability of development (see HBF answer to Q32). The viability of housing sites will be affected because the financial dynamics of older persons housing are different to general housing. Build costs are higher due to specific design criteria suited to the needs of older people, a greater gross to net floor area for non-saleable shared facilities, elongated construction / sales periods and cashflows as no individual units can be occupied until communal areas are completed, which means substantial upfront investment before any return on capital is received.

Alternatively, the Council should consider allocating sites specifically for older persons and other specialist housing, where it is well located in respect of proximity to public transport, local amenities, health and other services. This alternative policy approach to support older persons and specialist housing is a positive and proactive way of meeting need for older persons housing.

If the Government implements proposed changes to Part M of the Building Regulations as set out in the "Raising Accessibility Standards for New Homes" consultation, which closed on 1 December 2020, the Council's proposed policy approach to accessible & adaptable homes and / or wheelchair homes will be superseded and policy requirements will be unnecessary.

In the meantime, if the Council wishes to adopt the optional standards for accessible & adaptable dwellings, then this should only be done in accordance with the 2019 NPPF (para 127f & Footnote 46) and the NPPG. Footnote 46 states "*that planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing where this would address an identified need for such properties*". As set out in the 2019 NPPF, all policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). If the Government had intended that evidence of an ageing population alone justified adoption of optional standards then such standards would have been incorporated as mandatory in the Building Regulations, which at present is not the case. Therefore, a policy requirement for M4(2) and M4(3) dwellings must be justified by credible and robust evidence. The NPPG sets out the evidence necessary to justify a policy requirement for optional standards. The Council should apply the criteria set out in the NPPG (ID 56-005-20150327 to 56-011-20150327).

All new homes are built to Building Regulation Part M Category 1 (M4(1)) standards, which include level approach routes, accessible front door thresholds, wider internal doorway and corridor widths, switches and sockets at accessible heights and downstairs toilet facilities usable by wheelchair users. These standards are not usually available in the older existing housing stock and benefit less able-bodied occupants. It is important to note that not all health problems affect a household's housing needs therefore not all health problems require adaptations to homes. M4(1) standards are likely to be suitable for most residents.

Many older householders already live in the District. Many will not move from their current home but will make adaptations as required to meet their needs, some will choose to move to another dwelling in the existing stock rather than a new build property and some will want to live in specialist older person housing. Recent research by Savills "Delivering New Homes Resiliently" published in October 2020 shows that over 60's households "*are less inclined to buy a new home than a second-hand one, with only 7% doing so*". The existing housing stock is considerably larger than the new build sector so adapting the existing stock is likely to form part of the solution.

When referencing M4(3) homes, the Council should distinguish between a wheelchair adaptable home (which includes features to make a home easy to convert to be fully wheelchair accessible) and a wheelchair accessible home (which includes the most common features required by wheelchair users). The Council is also reminded that the requirement for M4(3) should only be required for dwellings over which the Council has housing nomination rights as set out in the NPPG (ID 56-008-20150327).

The Council's policy approach should not compromise the viability of development (see HBF answer to Q32). The Government's consultation "Raising Accessibility Standards for New Homes" (ending on 1st December 2020) estimates the additional cost per new dwelling is approximately £1,400 per dwelling for homes that would not already meet M4(2). In September 2014 during the Government's Housing Standards Review EC Harris estimated the cost impact of M4(3) per dwelling as £15,691 for apartments and £26,816 for houses, however inflationary increases to build costs since 2014 should be added. M4(3) compliant houses are also larger than NDSS (DCLG Housing Standards Review Illustrative Technical Standards Developed by the Working Groups August 2013) therefore larger sizes should be used when calculating additional build costs for M4(3) and any other input based on square meterage.

**Q32. Are there any specific issues that the Local Plan should address in relation to planning obligations and developer contributions?**

Viability is a key issue in determining the soundness of the Local Plan at Examination. Without a robust approach to viability assessment, land will be withheld from the market and housing delivery will be threatened, leading to an unsound Local Plan and housing delivery targets not being met. In plan-making,

viability is inseparable from the deliverability of development. The viability of individual developments and plan policies should be tested at the plan making stage (also see HBF answers to Q7, Q9, Q11, Q19 & Q21). As set out in the 2019 NPPF, the contributions expected from development including the level & types of affordable housing provision required and other infrastructure for education, health, transport, flood & water management, open space, digital communication, etc. should be set out in the Local Plan. Development should not be subject to such a scale of obligations that the deliverability of the Local Plan is threatened (para 34). Viability assessment should not be conducted on the margins of viability. This will be particularly important in the aftermath of uncertainties caused by the Covid-19 pandemic and Brexit. If the resultant Benchmark Land Value (BLV) is lower than the market value at which land will trade, then the delivery of housing targets will not be met.

## **Conclusion**

It is hoped that these responses are of assistance to the Council in preparing the next stages of its new Local Plan. For the new Blaby Local Plan to be found sound under the four tests of soundness as defined by the 2019 NPPF, the Local Plan should be positively prepared, justified, effective and consistent with national policy (para 35). As the preparation of the new Local Plan progresses, the HBF look forward to submitting further representations during later consultation stages, in the meantime, if any further information or assistance is required please contact the undersigned.

Yours faithfully  
for and on behalf of **HBF**



**Susan E Green MRTPI**  
**Planning Manager – Local Plans**