

Sent by email to: [planning.policy@molevalley.gov.uk](mailto:planning.policy@molevalley.gov.uk)

05/11/2021

Dear Sir/ Madam

### **Response by the Home Builders Federation to the consultation on the draft Mole Valley Local Plan**

1. Thank you for consulting the Home Builders Federation (HBF) on the draft Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

#### **Duty to co-operate**

2. Section 33A of the Localism Act places a duty on local planning authorities to co-operate in maximising the effectiveness of plan preparation. In particular, it requires local planning authorities to engage constructively, actively and on an ongoing basis in the preparation of development plan documents so far as they relate to strategic matters. A strategic matter is defined in the act as “*sustainable development or use of land that has or would have a significant impact on at least two planning areas*” and as such the failure of a neighbouring area to meet its housing needs would be considered a strategic matter.
3. The Council have considered the issue of unmet housing needs in neighbouring areas in its statement of co-operation. Table 8 sets out a summary of the responses from these areas and shows that a number of areas with whom the Council has a strategic and cross boundary relationship are not meeting their housing needs. Most pertinently it is evident that the three other local planning authorities the Council consider to be in their housing market area (HMA), Kingston upon Thames, Elmbridge and Epsom and Ewell, are unlikely to meet their needs in full. In particular we note that Elmbridge has recently paused the publication of its regulation 19 local plan in order to remove proposed amendments to the Green Belt which will clearly result in substantial unmet needs for this borough alone. Whilst these authorities are yet to formally identify the level of unmet needs this should not be a barrier to Mole Valley District Council (MVDC)



considering how they could best increase their supply of development land to ensure housing needs across the HMA are met in full.

4. Outside of the HMA there are also identified unmet needs in the neighbouring Borough of Reigate and Banstead (RBBC) where the Council has maintained its constraints-based requirement of 460 dpa, 180 dpa short of the Council's assessed needs of 640 dpa. It is also the case that the Council would have been aware of this long-standing level of unmet housing needs given it first arose in the examination and adoption of RBBC's current local plan.
5. However, in preparing this local plan MVDC do not appear to have considered a spatial strategy that could have addressed these unmet needs. The Sustainability Appraisal, and its earlier iterations, for example do not appear to consider levels of development beyond the minimum requirements established through the standard method of 7,752 dwelling per annum. As such it is not clear whether the MVDC examined the potential to deliver higher levels of growth and the impact of unmet needs on their housing market and in particular the cost of housing for newly forming households in the Borough. Across the Co-operation Statement it would appear that there is agreement between authorities that needs would not be met in full, with no consideration as to how unmet needs could be addressed. If co-operation is to be considered to have maximised the effectiveness of plan making there must at least be a consideration when deciding on the spatial strategy for an area.
6. Whilst it is accepted that there are constraints in MVDC that may prevent either their own needs or the needs from other areas being met there should still have been a detailed analysis as to whether the allocation of additional land to address the unmet needs of another area would significantly and demonstrably outweigh the benefits. Furthermore, such a discussion may well have informed decisions with regard to the Council's ability to meet its own housing needs, recognising that there will be negative impacts arising from other areas not meeting their housing needs. Therefore, whilst the NPPF and the duty to co-operate does not require a Council to address the unmet needs of a neighbouring area it stands to reason that for the process of co-operation to be deemed to have maximised the effectiveness of plan preparation that a spatial strategy addressing some of the unmet needs arising in neighbouring areas should have been considered. Without such considerations the approach to the duty is purely tick box exercise and suggests the Council never had any intention of addressing this key strategic and cross boundary issue.

### **S1: Sustainable Mole Valley**

Failure to meet housing needs in full is unsound as it is unjustified.

7. Policies S1 and H1 establish the housing requirement for Mole Valley over the plan period as at least 6,000 homes - 353 dwellings per annum (dpa). As the Council recognise this level of housing provision does not meet the minimum

requirements established through the application of the standard method of 456 dpa or 7,752 over plan period. There is a 1,751 (103 dpa) shortfall against minimum housing needs.

8. The Council's justification for not meeting housing needs is based on paragraph 11 of the NPPF which states that minimum housing needs must be met unless: *"the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area"*. The constraints referred to in paragraph 11 are then set out in footnote 7 and the Council have considered those constraints relevant to Mole Valley in its constraints analysis. Whilst there are absolute constraints such as SSSIs, Special Protection Areas and functional flood plain the main constraint that restricts development in the Borough from meeting housing needs is Green Belt which covers 76% of the Borough's undeveloped land.
9. As the Council are aware Green Belt is not an absolute constraint but a policy constraint that can be amended, in exceptional circumstances, by the Council after once it has ensured, as set out in paragraph 141 of the NPPF, that its strategy makes as much use as possible of suitable brownfield sites and underutilised land, optimises density and has been informed by discussion with neighbouring authorities as to whether they could accommodate some of their identified unmet needs. We would agree that the Council have clearly met these tests with regard to paragraph 141 and therefore it is necessary for them to consider whether there are the exceptional circumstances required to amend Green Belt boundaries.
10. The Council have set out their evidence with regard to exceptional circumstances in the Green Belt Exceptional Circumstances Topic Paper with the outcome of this assessment, alongside the Green Belt Review, that 20 of the sites in the Green Belt that were submitted for allocation exhibit the exceptional circumstances required to amend Green Belt boundaries. Whilst we would agree with Council that there are the exceptional circumstances required to amend Green Belt, we are concerned that the evidence and the approach used in identifying sites to be removed from the Green Belt is flawed and has been overly restrictive in the site selection process and that further sites could have been allocated in the local plan. In considering the Council's approach it is also necessary to recognise that paragraph 11 states that the application of policies in the NPPF that protect assets or land must provide a **"strong reasons for restricting the overall scale of growth"** (our emphasis). This suggests that the impact of not meeting needs is considered to be a significant issue to be taken into account when considering the restriction of development and that the evidence and approach taken by the Council must be sufficiently robust to show there are strong reason for not meeting their minimum requirements for new development.
11. Our concerns regarding the Council's approach to considering sites in the Green Belt are in relation to:

- Whether the Green Belt Review and approach to the sifting of sites for consideration of exceptional circumstances is sufficiently robust; and
- Exceptional circumstances and the severity of the pressures facing Mole Valley.
- The need to ensure that green belt boundaries can endure beyond the plan period.

*Green Belt Review and site-specific exceptional circumstances*

12. There is no prescription set out in national policy or guidance with regard to undertaking a review of Green Belt boundaries. However, there are examples across the Country of sound Green Belt reviews that have generally taken an approach that considers the overarching strategic nature of the Green Belt in the area followed by the identification of different parcels of Green Belt with a final finer grained assessment in relation to those sites submitted for consideration to be allocated in the local plan. MVDC's have taken a two-stage approach that has examined relatively large ill-defined areas of Green Belt against the purposes set out in paragraph 139 of the NPPF followed by an assessment of submitted sites.
13. The disadvantages of such an approach are highlighted in terms of the final assessment of submitted sites which screens out any site in one of the broad areas where there is considered to be significant harm. A similar approach was undertaken by Welwyn Hatfield who concluded that it was unable to meet its housing needs on the basis of their Green Belt review that was, as the inspector states in his note on Green Belt following the initial hearings:

*“... at such a strategic level as to render its findings on the potential harm to the purposes of the Green Belt, caused by development within the large parcels considered as a whole, debatable when applied to smaller individual potential development sites adjacent to the urban areas.”*

14. Therefore, to rule out what might be a relatively small part of what are, in some instances, very substantial areas of land without further consideration of site-specific circumstances and potential mitigating measures cannot be considered to be a robust approach. A finer grained assessment of well-defined parcels would have better identified variations in how land performs against purposes of Green Belt and potentially allowed more sites to come forward.
15. In addition, by not defining smaller parcels on the basis of clearly defined boundaries the Council are failing to consider properly the impact of such boundaries with regard to infrastructure such as roads and rail can define different areas of land and either have an urbanising effect or indeed maintain the separation of towns. For example, area LH contains the M25 which provides a physical and visual barrier between Ashted and Leatherhead. By considering this area as a whole, the impact of the M25 and the visual separation this provides between these two areas is not sufficiently taken into account and its classification

as having a significant impact on the separation of Ashted and Leatherhead removes any consideration of development opportunities in this area. We recognise that the Council has considered the impact of the M25 in its assessment of area LH but in considering the area as a whole rather than separate parcels the extent of the separation created by the motorway is potentially downplayed.

16. In order for the assessment to be robust we therefore consider that it was necessary for those sites that were dismissed prior to the consideration of site-specific exceptional circumstances to be assessed by the Council to establish whether or not exceptional circumstances are present at a site level to support their release. This can be only robust approach given the fact that the areas of land assessed against the Green Belt purposes are significant and as such development sites within these areas may have minimal impact on the overarching performance of that area of Green Belt. Without such consideration, alongside the overarching exceptional circumstances supporting the amendment of Green Belt boundaries, the Council cannot state that there are strong reasons why needs should not be met in full.

*Exceptional Circumstances severity of pressure on Mole Valley's housing market*

17. The Council outline the acuteness and intensity of housing needs in Mole Valley and the pressures on the housing market in paragraphs 3.21 to 3.24 in the Green Belt Exceptional Circumstances Topic Paper. It is clear from the Council's evidence that there is insufficient brownfield land in Mole Valley to meet needs and that without Green Belt releases there would be an even more significant shortfall in housing supply. It is also evident that the continued failure of the Council and its neighbours to deliver sufficient new homes to meet needs over recent years has contributed to the worsening of the affordability ratios. The lower quartile affordability ratio in Mole Valley has risen from 10.48 in 2011 to 14.46 and median ratio from 9.59 to 14.74. A similar situation can be seen in the neighbouring authorities with Elmbridge and Epsom and Ewell experiencing similar trends.
18. The Council also has a significant need for affordable housing that will get substantially worse without further sites being allocated. Over the last 5 years just 104 affordable homes were built, an average of just 20 homes per annum against a stated target of 47 such homes per annum and a deficit of 556 affordable homes. The Council have stated that there is a need to deliver 143 homes per annum. We could find no statement by the Council as to how many affordable homes are likely to be delivered through this local plan but given the scale of need, we would expect there to be a substantial shortfall between the stated need and supply. The poor delivery of affordable housing in the area and the growing need clearly provides additional weight to our position that the circumstances faced by Mole Valley require more sites to be released from the Green Belt and housing needs met in full.
19. These significant pressures are not only present within Mole Valley but also in the wider housing markets affecting South West London and Surrey. In considering

the degree to which Green Belt boundaries can be amended and the strong reasons for not meeting needs the scale of the potential shortfalls in housing delivery and worsening affordability of housing should have been given greater weight. It would clearly be appropriate given the affordability issues and lack of past delivery for the Council to allocate sites for development even in those parts of the Green Belt where it is considered to play a significant role in meeting the purposes of this designation.

*Green Belt boundaries that endure beyond the plan period.*

20. It is notable, as seen in the appendix to this representation, that the Council will not have a five-year housing land supply from 2026/27 and as such from this date the plan will be considered out of date. Whilst this position is somewhat inevitable given that the housing requirement is based on housing supply the HBF are concerned that this means that an early review and further Green Belt amendments are inevitable. It is important to recognise that paragraph 140 of the NPPF requires that strategic policies have regard to the need to ensure that Green Belt boundaries can endure beyond the plan period. Therefore, the fact that the local plan will be out of date within five years of adoption does not suggest that the boundaries can endure in the long term and that further amendments should be made in this local plan to ensure development needs are met in full.

*Conclusions and recommendations on Policies S1 and H1*

21. The HBF do not consider the Council to have provided the necessary justification for not meeting housing needs in full, or indeed to draw the conclusion that they cannot meet the needs from a neighbouring area. Firstly, the broad-brush approach to assessing the performance of Green Belt in different areas against its purposes is insufficient to reject sites before considering site specific exceptional circumstances. A finer grained assessment of more defined parcels prior to site selection would have offered a more robust consideration of the contribution land designated as Green belt makes to the purposes of this designation. As such the Council's approach is insufficiently robust and, as such, they cannot justify the proposed housing requirement in the Local Plan. The Council should reassess all those sites in the Green Belt that were rejected at the first sift and consider their suitability for allocation. Alongside this we would recommend that the Green Belt assessment considers parcels that are more clearly defined in order to ensure a more balanced consideration as to how different areas perform against the purposes of Green Belt on their own and in relation to other parcels.
22. Secondly, the circumstances faced by the Council with regard to the limited supply of brownfield sites, the affordability of housing locally, the failure to meet the need for affordable housing and the pressure on the housing market from the failure of other areas to meet needs all suggest that there is justification for releasing further sites from the Green Belt. In fact, we would suggest that these circumstances are sufficient to justify amendment to Green Belt boundaries even where the Council consider it to have a significant role with regard to at least one of the purposes.

23. Finally, the Council will seemingly not have a five-year housing land supply from 2026/27 and as such from this date the plan will be considered out of date. This does not suggest that the boundaries can endure in the long term and that further amendments should be made in this local plan.

### **H1: Housing Delivery**

The policy is unsound as it has not been robustly justified.

24. As set out in our representation on policy S1 the HBF consider the housing requirement for this local plan to be unsound. With regard to supply the HBF does not comment on the delivery of specific sites that contribute to housing supply in the local plan. However, we are concerned that whilst there is evidence provided as to the average windfall over the last ten years in the 2020 SHELAA the annual breakdown of supply from these sources does not seem to have been set out by the Council to indicate whether there is a consistent supply of such sites or whether this may diminish over the course of this local plan.

### **Policy H3 Affordable housing**

The policy is unsound as it has not been fully justified.

25. It is not clear that the viability assessment has considered the issue of First Homes correctly and as such does not full reflect the costs associated with delivering residential development in MVDC. Whilst these homes fall under the definition of affordable housing in terms of viability, they cannot be treated the same as an affordable home ownership product as they are developed and sold by the developer. This is fundamentally different to a shared ownership unit or affordable home for rent which are both bought up front by a housing association with the developer in effect acting as a contractor. As the risk is lower as there is no need to put the house on the open market the developer accepts a lower level of profit.
26. However, a First Home would be sold by the developer and as such they retain the risk and costs that would apply to any home sold on the open market. Therefore, the proportion of new homes delivered as First Homes should be treated in the same way as other market homes for sale. Given the Council's concern with regard to the marginal viability of some site typologies it will be important that these additional costs, and other highlighted in our representations, are considered through a revised viability assessment to ensure this policy and the plan as whole is deliverable.
27. Finally, paragraph 4.16 sets out the Council's position with regard to site viability assessments. However, given that the viability assessment indicates at paragraph 10.54 that viability on some sites is tight we would suggest that it is referred to in policy to ensure its effectiveness.

## **H6 Housing for older persons and specialist housing**

### The policy is unsound because it is not effective

28. The Council recognise that an increasing elderly population will require the delivery more specialist accommodation in future. As such, the priority should be for the Council to allocate sites promoted for such accommodation in the local plan. Only through site allocations can the Council be certain that the needs of older people be met.
29. However, the HBF recognise that it may not be possible to allocate sufficient sites for specialist accommodation to meet the needs of older people. As such it is important that the policy provides an effective mechanism through which decisions on accommodation can be made on the basis of the need for and supply of such development. It is therefore important that this policy sets out how many specialist homes for older people are required in Mole Valley and a commitment is made to monitoring supply against this level of need across the plan period. In addition the HBF would also recommend that a presumption in favour of development be applied if the supply of land for such development falls below identified needs.

## **H9: Housing Mix**

### The policy is unsound as it is not effective

30. The HBF considers the size mix set out in part 2 of H9 to be overly prescriptive especially in relation to smaller sites. Whilst we understand the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is effective and ensures that housing delivery will not be compromised or stalled due to policies that are prescriptive in applying evidence for a district wide mix of housing on every site. In particular such prescriptive policies have most impact on smaller sites where it is inevitably harder to achieve a prescribed mix of housing types. We recognise the Council has provided some flexibility in the policy with regard to town centre sites and low-density development, but we consider these to provide insufficient flexibility.
31. It is important to remember that whilst Strategic Housing Market Assessments (SHMA) can provide a broad snapshot in time of what is needed across an LPA or HMA they do not provide a definitive picture as to the demand for different types of homes in specific locations. So, whilst we support Council's in seeking to achieve a broad mix across the plan period this should not be translated directly into policy. It should be left for developers to supply the homes they consider are necessary to meet demand. The development industry understands what types of homes are needed to meet the demands of its customers, if it did not then the homes would not sell.



32. We would therefore suggest that the policy requires applications for housing development to have regard to the evidence on housing mix but that the final mix is left to agreement between the applicant and decision maker on a site-by-site basis. This would establish a flexible approach to housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location.

### **H10 Standards for Accessibility, Water and Space**

The adoption of the national described space standards is not sound as it as not been adequately justified.

33. The NPPF requires Councils to justify the use of the optional technical standards in relation to accessibility, water, and space. MVDC's justification for the application of these standards is set out in optional technical standards evidence paper. Whilst we have no comments on the Council's justification for its accessibility standards or the water use standards, the evidence supporting the adoption of nationally described space standards (NDSS) is not particularly robust. Firstly, much of the evidence comes from changes of use rather than new build development. As the Council will be aware such development will now be required by law to meet the NDSS. With regard to other types of development there does not appear to be any evidence that there is an endemic problem with regard to development below NDSS in new build housing. In fact, the Council provide only one example of a new build development being below space standards.
34. Whilst the HBF shares the Council's desire to see good quality homes delivered across Mole Valley we also consider that space standards can, in some instances, have a negative impact upon affordability issues and reduce customer choice. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards, but which would allow on lower incomes can afford a property which has their required number of bedrooms. Given the poor affordability of property in the area and the tight constraints on development it is therefore important that the Council can provide robust evidence that there is a need to introduce the optional space standards.
35. Should the Council be able to provide the necessary evidence we would also suggest that some flexibility is included within the policy to allow for well-designed homes that are below space standards to come forward. As set out above there are circumstances where a smaller home will meet consumer needs and including a degree of flexibility will be allow those needs to be met.
36. Finally, with regard to the requirement relating to wheelchair accessible housing the Council will need to make the distinction between a wheelchair adaptable home and wheelchair accessible home under part M4(3) as PPG states that wheelchair accessible home can only be required through the local plan where the council has nomination rights for that house.

## EN9: Natural Assets

The policy is unsound as it is inconsistent with national policy.

37. The requirement for a 20% net gain in biodiversity is not sound. No justification has been provided as to why MVDC is any different to the rest of the country and should set a higher requirement for net biodiversity gains. If Government considers 10% sufficient to mitigate the impact of new development in future, then this should also be an appropriate level of net gain for MVDC. It is important to recognise that the Environment Bill does not set this as a minimum and at present there is no suggestion that this legislation will allow for a higher requirement to be set in local plans. It is also the case that the Environment Bill allows for a 2-year transitional period from Royal Assent, a position not currently reflected in the Council's policy.
38. A 20% requirement will also have a significant additional cost to development. The costs set out by Government in its impact assessment indicates that overall, a 20% net gain requirement would lead to, roughly, a £20,000 per hectare increase in the direct costs to developers. Whilst this evidence is a helpful broad assumption as to the cost of delivering net biodiversity gains it is important to recognise that this assessment was based on estimates at a national and regional averages and so is not directly comparable to local delivery where costs could be higher. As such headroom must be available in the plan wide viability assessment to take account of higher local costs.
39. It is also important to note that the Government's impact assessment for a 20% net gain requirement is based on scenario B where the majority of the net gain is delivered on site. An additional 10% of net gain would not necessarily follow this scenario with more offsite delivery being required. A higher degree of offsite mitigation is likely to be required in order to deliver a 20% net gain which will mean a far higher cost to the developer. If scenario C of the Government's impact assessment is taken as a broad assumption as to costs facing a developer, the proposed 20% net gain requirements could see costs rise significantly per hectare. If all of the additional 10% net gain above the proposed legislation being suggested by the Council had to be delivered offsite that could see costs rise by over £60,000 per hectare<sup>1</sup>.
40. This is a considerable additional burden compared to that set out in the viability assessment<sup>2</sup> and one that could impact on the viability and deliverability of some sites. Even if delivery could be achieved on site a higher net gain requirement would need more land reducing the developable area of a site, reducing the gross development value and site viability. On the basis that the Viability Assessment

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<sup>1</sup> Table 14 of Defra Biodiversity net gain and local nature recovery strategies Impact Assessment indicates scenario C would cost developers in the South East of England £63,841 per hectare to deliver 10% net gains off site.

<sup>2</sup> Paragraphs 10.38 of the Viability Assessment outlines that an additional £20,000 per hectare has been included in development costs to cover the 20% net gain requirement to its initial estimates of £20,000 per hectare for the 10% requirement originally tested.

outlines that development viability in MVDC is tight and delivering larger sites will be challenging we are concerned that delivering a 20% net gain in biodiversity could impact on the deliverability of some sites.

41. Therefore, we recommend that the policy is amended to ensure that it reflects the approach established in the Environment Bill that requires a 10% net gain in biodiversity and includes a 2-year transitional period before it is implemented.

### **EN13: Standards and targets for combatting the climate emergency**

Parts of this policy are unsound as they are inconsistent with national policy or unjustified.

42. The HBF supports a clearly defined national approach to improving the energy efficiency of new homes. Such an approach allows not only house builders but those industries supporting it to develop the necessary supply chains that will ensure these standards are met whilst maintaining the delivery of new homes. As such we are supportive of the Government's phased approach to this matter. As these standards will be a requirement of building regulations on the adoption of the local plan then it is will not be necessary to include these in policy as set out in points a, b and c of part 1 this policy. This approach is inconsistent paragraph 16 of the NPPF which states that local plans should avoid unnecessary duplication. We would therefore recommend that points a, b and c of part 1 are deleted.
43. In addition, the HBF does not consider point of part 1 of this policy which requires all major new residential development to be zero carbon to be consistent with national policy. The housebuilding industry, through the HBF, recognises that there is a need to improve the environmental performance of new residential development. In order to achieve this, we established, with a wide range of partners, the Future Homes Task Force. This task force examined how the house building industry can work toward delivering net zero homes by 2050. The initial outcomes of this work can be found at <https://www.futurehomes.org.uk/> with a summary of the Delivery Plan resulting from this work attached to this response.
44. The delivery plan published by the task force outlines the need to operate on a collective basis recognising the need for housebuilders, their supply network and the trades people building homes to successfully transition to the delivery of low carbon homes. In addition, it recognises the need for both national and local government alongside housebuilders to ensure those people buying new homes are confident in the technologies and systems being used. This approach, which allows for a transition to low carbon is also consistent with paragraph 152 of the NPPF.
45. This stepped approach would ultimately see all new homes deliver a 75% reduction in emissions compared to 2013 Building Regulations from 2025 whilst allowing supply chains to develop and ensure deliverability of the higher standard

at the appropriate time. The Council must recognise that this not just an issue of viability but also one of deliverability and that, as the Government notes in paragraph 2.53 of their consultation response, the interim part L standards are a key stepping stone to implementing the higher standards from 2025.

46. As such the HBF consider the national standardised approach being promoted by Government to be the most effective way forward as it balances improvements to building performance with the continued delivery of housing and infrastructure and that 1e is deleted.
47. Part 2b sets out the Council's requirements with regard to electric vehicle charging points. Whilst the HBF accept that electric vehicles will form a key part of the Government's strategy to reduce carbon emissions it is necessary for these to be properly considered with regard to their potential impact on the viability of new development. However, whilst the Viability Assessment highlights at paragraph 8.68 the cost of installing an electric vehicle charging point at just under £1,000 no allowance seems to have been made with regard to potential improvements to the electricity supply infrastructure that may be required to support the use these charging points.
48. The HBF and its Members also have serious concerns about the capacity of the existing electrical network in the UK. The supply from the power grid is already constrained in many areas across the country. Major network reinforcement will be required across the power network to facilitate the introduction of EVCPs and the move from gas to electric heating as proposed under the Future Homes Standard. These costs can be substantial and can drastically affect the viability of developments. If developers are funding the potential future reinforcement of the National Grid network at significant cost, this will have a significant impact on their businesses and potentially jeopardise future housing delivery. The Government's current proposal automatically levies a capped figure of £3,600 per charge point on developers for upgrading local electricity networks, therefore this figure should also be included in the Council's viability assessment to ensure there is some consideration as to the likely cost of this policy on new development.

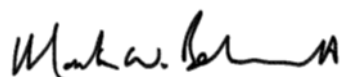
## **Conclusion**

49. At present we do not consider the plan to be sound, as measured against the tests of soundness set out in paragraph 35 of the NPPF, for the following reasons:
  - Insufficient justification for not meeting housing needs in full;
  - Incorrect consideration in the viability study with regard to First Homes provision, Electric Vehicle Charging Points, and the requirement to deliver 20% net gain in biodiversity;
  - Ineffective approach to older people's housing provision;
  - Overly prescriptive approach to housing mix;
  - Insufficient justification to support the application of space standards;
  - Requirement to deliver 20% net gain in biodiversity is inconsistent with national policy;

- Duplication of national policy with regard to uplifts to part L and F of the building regulations; and
- Requirement for major development to be zero carbon is inconsistent with national policy.

50. We can also confirm that we would welcome the opportunity to participate in the hearings in order to ensure that the concerns of our members are articulated to the inspector examining the local plan.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Mark Behrendt', with a stylized flourish at the end.

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## Appendix 1: Five-year housing land supply

	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37
<b>Req</b>	353	353	353	353	353	353	353	353	353	353	353	353	353	353	353	353	353
<b>Cumulative</b>	353	706	1,059	1,412	1,765	2,118	2,471	2,824	3,177	3,530	3,883	4,236	4,589	4,942	5,295	5,648	6,001
<b>Delivery</b>	274	354	334	478	627	603	543	480	337	223	222	247	179	257	257	292	293
<b>Cumulative</b>	274	628	962	1,440	2,067	2,670	3,213	3,693	4,030	4,253	4,475	4,722	4,901	5,158	5,415	5,707	6,000
<b>Surplus/ deficit</b>	-	-78	-97	28	302	552	742	869	853	723	592	486	312	216	120	59	-1
<b>5-year req</b>	1,765	1,765	1,765	1,765	1,765	1,765	1,765	1,765	1,765	1,765	1,765	1,765	1,765				
<b>add deficit/ surplus</b>	1,765	1,765	1,769	1,771	1,763	1,745	1,726	1,708	1,693	1,687	1,693	1,699	1,704				
<b>Buffer</b>	88	88	88	89	88	87	86	85	85	84	85	85	85				
<b>Total req</b>	1,853	1,853	1,858	1,859	1,851	1,832	1,812	1,793	1,777	1,772	1,777	1,784	1,789				
<b>5-year supply</b>	2,067	2,396	2,585	2,731	2,590	2,186	1,805	1,509	1,208	1,128	1,162	1,232	1,278				
<b>Surplus/ deficit</b>	214	543	727	872	739	354	-7	-284	-569	-644	-615	-552	-511				
<b>5YHLS</b>	5.58	6.46	6.96	7.34	6.99	5.97	4.98	4.21	3.40	3.18	3.27	3.45	3.57				

