

Sent by email to: local.plan@hertsmere.gov.uk

06/12/2021

Dear Sir/ Madam

Response by the Home Builders Federation to the consultation on Hertsmere Local Plan

1. Thank you for consulting the Home Builders Federation (HBF) on the latest consultation on the Hertsmere 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.
2. Before commenting on specific policies being proposed we would like to raise an overarching comment with regard to the use of SPDs and other guidance. Across a variety of policies, the Council sets out that it will expect applicants to accord with supplementary documents outside of the local plan, as the Council will be aware such documents are there to provide additional guidance as to how a policy should be implemented and should not set standards or requirements that could be used to refuse an application.
3. In order for the Council to require compliance with any standards they must be included in the local plan as they are policies against which an application could be refused, they are legally considered to provide more than just guidance to the applicant. The issue of what is policy is explored in detail in the High Court Judgement between William Davis Ltd, Bloor Homes Ltd, Jelson Homes Ltd, Davidson Homes Ltd & Barwood Homes Ltd and Charnwood Borough Council. In this case Justice Gilbart quashed the SPD on the grounds that it contained policies that should have been contained in the local plan because they could be considered to fall under regulation 5(1)(a)(i) and 5(1)(a)(iv) of the Town and Country Planning Regulations (2012).
4. As such policies in the local plan cannot refer to standards set elsewhere or defer in future to subsequent revisions of standards that are set out in supplementary documents to the local plan. Such changes would need to be made through a focussed review of the local plan in order to allow the proper scrutiny of any changes being made. Therefore, any reference to supplementary guidance in policy should state that applicants "*have regard*" to this guidance but must not state that they should accord with it. Where standards are included in the local



plan the Council should also ensure that any requirement to accord with future guidance should also be removed.

Strategic policies

5. It is not clear from the consultation document which policies are considered to be strategic and which are non-strategic. Paragraph 21 requires local plans to explicitly state which policies are strategic to set out the Council's strategic priorities and provide a clear starting point for any non-strategic policies that are needed, and the Council should make this clear in the next iteration of the local plan.

Policy H1 – the supply of new homes

6. The HBF would agree with the Council's assessment as to the minimum number of homes it is required to deliver using the standard method as being 724 dwellings per annum (dpa). However, we are concerned that the:
 - unmet needs of neighbouring areas have not been taken into account in establishing their housing requirement;
 - consideration of the capped requirement
 - plan period is not consistent paragraph 22 of the NPPF;
 - minimum housing requirement is not set out in policy H1;
 - buffer between needs and supply is insufficient to ensure that needs are met in full;
 - No evidence has been provided as to exceptional circumstances for amendments to Green Belt boundaries; and
 - No indication is provided as to whether 10% of homes will come forward on sites of less than one hectare.

Unmet needs from neighbouring areas and the duty to co-operate

7. In establishing the housing requirement for an area paragraph 60 of the NPPF sets out that alongside the local housing needs assessment the Council must also take into account the unmet needs of neighbouring areas. However, no mention is made within the local plan as to whether there are unmet needs in neighbouring areas and how the Council are considering these needs. Firstly, there is the perennial issue for those Councils in housing market areas that are heavily influenced by London and its failure to meet its own housing needs, an issue most recently established in the adopted London Plan 2021.
8. Over the next ten years there is projected to be a shortfall of 14,000 homes per annum in the capital that resulted from the over assessment of delivery from small sites and the subsequent amendments by the Panel examining the London Plan. Whilst the mayor intends to produce a revised London Plan before the termination date of the new London Plan with revised targets the constraints on the capital will continue make it very difficult for the city's needs to be met in full and it will be

important for areas that adjoin London, such as Hertsmere to consider how it could increase its own housing supply to address some of these unmet needs.

9. One of the key issues arising from the examination of the London Plan was the difficulty in reaching any form of agreement with regard to the potential redistribution of unmet housing needs from the capital given the lack of regional co-ordination. The Mayor of London was looking for willing partners but without any strategic planning bodies at a higher spatial level these requests were ignored by the rest of the wider south east. The Mayor of London cannot force others to address the capital's unmet housing needs, it is therefore the responsibility of Councils in the wider south east, especially those bordering the capital such as Hertsmere, to give proper consideration as to how they may assist in addressing this strategic matter.
10. There are also expected to be shortfalls in the neighbouring local authority of Three Rivers that will need to be considered by the Council when establishing their housing requirement. As the Council will be aware Three Rivers published a consultation document in July setting out that they expect a shortfall of 1,705 new homes over the period of their new local plan. This is a considerable shortfall and one that the Council will, alongside others in South West Hertfordshire (SWHerts), need to ensure are met in full in those local plans currently being prepared. What the Council and its partners in SWHerts cannot do is defer this matter, or indeed other cross border or strategic issue, to the joint strategic plan that is currently being taken forward. The Government have been clear in paragraph 61-022 of Planning Practice Guidance (PPG) that strategic matters, such as unmet housing needs, should not be deferred and it will be important that the Council considers how it may address some of the unmet needs arising within the joint planning area, or indeed any other neighbouring area that cannot meet its own needs.
11. Moving forward the Council will also need to assess, as part of the Sustainability Appraisal (SA), the likely significant effects of delivering a higher level of housing than is being proposed. The SA report published as part of this consultation does not test a higher figure than that presented in Draft Local Plan. Given that, as set out above, the London Plan is acknowledged not to meet needs in full and Three Rivers have stated that they are unlikely to meet their own needs this is clearly a reasonable alternative for the Council to consider. A failure to include such an option moving forward into the next stage of plan preparation would clearly indicate that the SA process was insufficiently robust to inform decision making with regard to spatial strategy and the level of housing that should be delivered in Hertsmere.

Capped local housing needs assessment

12. Whilst the minimum of number of homes the Council are required to deliver is 724 dpa, and the plan could be found sound on this basis, it is important to note that this figure has been capped. However, PPG does state that the cap is intended to ensure the housing requirement is as deliverable as possible and as such does

not reduce the level of need itself and where a cap is applied consideration can still be given to whether a higher level of need could realistically be delivered. Therefore, if there are sustainable sites that are available for development that would support the Council in meeting, or getting closer to meeting, the uncapped figure the Council should consider allocating such sites. Through such allocations the Council would reduce the need for an early review in order to update the plan as would be required by paragraph 2a-007 of PPG if the capped figure is adopted.

13. Therefore the Council should, as set out above, consider the option of delivering a housing requirement that goes beyond the minimum level of need established using standard method as part of the SA. It is clear that this is a reasonable alternative and one that should have been considered throughout the plan making process.

Plan period

14. The Council are proposing a plan period to run between 2022 to 2038 and state in the consultation document that this will ensure a 15-year period from adoption in line with the NPPF. However, the housing target set by the Council is for a 16-year period from 2022 meaning that the plan runs to the end of 2037. This is later confirmed in figure 3 with the housing trajectory being shown to cover the year from 2022 to 2037. Therefore, if the local plan was adopted in line with the Council's LDS in June 2023 there would be less than 15 years remaining on the plan period. However, given the delays already seen to the timetable set out in the LDS the plan is unlikely to be adopted by June 2023.
15. Even using the Council's ambitious timetable given the delays already it would appear that the Council could at the earliest submit the plan at end of 2022. Even with a relatively short examination in public it is unlikely that the plan could be adopted before the end of 2023 with the likelihood of adoption being in the first quarter of 2024. Given the plan period runs to the end of 2037 this would mean that from adoption there would be less than 14 full years of the plan period remaining.
16. Therefore, our first recommendation on the plan period is that the Council are clear as to when the plan period ends. If period is expected end in 2037 then this should be clearly stated in the local and be reflected in the plan period. Secondly, on the basis that the plan would appear to end in 2037 there is likely to be only 14 years from the point at which the local plan is adopted. We would therefore recommend that the plan period is extended by a single year to take account of delays to plan preparation and ensuring that the plan is consistent with paragraph 22 of the NPPF.

Including the minimum housing requirement in policy

17. The Council are proposing that provision will be made for 760 dwelling per annum (dpa) over the plan period. This level of need is based on the outcomes of the

standard method, 724 dpa, plus a 5% buffer to ensure choice. However, what is not clear is whether the Council consider this to be their housing requirement or the level of homes they expect to deliver. On the basis of the housing trajectory in figure 3 it would appear that the Council consider the 760 homes to be their housing requirement.

18. Whilst the HBF is supportive of Councils who seek to plan beyond their minimum requirement, indeed we consider it necessary in order to ensure these are met in full, it would appear that the Council is confusing the expectation at paragraph 75 of the NPPF that the Council should seek to maintain a supply of developable land for at least 5 years plus 5%. However, this is a buffer all authorities are required to have within their land supply is to ensure choice and competition in the market for land and as such should form part of supply and not be added to the housing requirement. This is because this figure is variable and could be 20% should the Council fail the Housing Delivery Test. If the Council do, consider the 760 dpa to be their minimum requirement against which their five-year land supply will be assessed then they should clearly state this. If this is not the case and in order to avoid confusion and uncertainty for decision makers and applicants alike when considering whether or not the Council has a five-year land supply, we would suggest that the Council amend the opening paragraph of H1 to read:

In order to meet the minimum requirement to deliver 724 new homes each year provision will be made for the delivery of at least 12,160 additional dwellings between 2022 and 2038 equating to a minimum of 760 dwellings per year.

Insufficient buffer in overall supply

19. As mentioned above the Council have included a 5% buffer in supply over its minimum requirement in order to ensure choice in the market. As outlined above the HBF also considers it necessary to ensure that there is a buffer between minimum requirements and the level of housing supply coming forward through a local plan. However, as set out above it is important to distinguish between the generic 5% buffer required with regard to the five-year housing land supply and a buffer in overall supply that seeks to address the specific risks to overall supply from the spatial strategy that is adopted. Those plans where there is the expectation that a significant proportion of new development over the plan period will come forward from strategic allocations must recognise that such sites may not come forward as expected either in terms of timescales or levels of delivery.
20. This is not to say that a new settlement, or the strategic expansion of an existing settlement, should not be a key element of the land supply in this local plan. Such allocations provide a secure supply of land for development well into the future. However, in making such allocations we would advise the Council to take a cautious approach recognising the complexity of delivering such development and the impact this has on the point at which such schemes will start delivering new homes. Too often Councils are overly optimistic about the delivery of new

settlements ultimately leading to trajectories being pushed back later on in plan preparation once the strategy has been decided upon in order to maintain a five-year land supply. In some cases, this can lead to plans being found unsound.

21. It is therefore important that a buffer of around 20% is included in overall supply to ensure sufficient flexibility and choice in the land market to ensure needs are met in full. Given that over 50% of the Council's supply over the plan period will come from large strategic allocations, with 20% from the new garden settlement, we consider it necessary for the Council to provide a more significant buffer than is currently the case. A 5% buffer in overall supply is unlikely to provide the necessary flexibility to ensure needs are met in full and address the risks to meeting needs in full present within the proposed spatial strategy.

Exceptional circumstances

22. The HBF considers there to be the exceptional circumstances for the amendment of Green Belt boundaries in Hertsmere, a position that Hertsmere clearly agree with given the statements made in the local plan. However, whilst the Council's Green Belt Review provides evidence as to the potential for such amendments the Council to not appear to have set out its evidence on exceptional circumstances. It is important that this assessment is provided in the next stage of consultation and include an assessment as to the exceptional circumstances for going beyond the minimum housing requirement in order to meet the needs of neighbouring areas or deliver a level of housing closer to the uncapped level of housing need. There are clearly significant benefits from higher housing delivery given the poor affordability of housing in Hertsmere and level of affordable housing need that provide the exceptional circumstances to amend Green Belt boundaries to deliver a high level of housing than is currently set out in the local plan.

Sites of less than one hectare

23. The Council will need to identify, as required by paragraph 68(a) of the NPPF, sufficient sites of less than one hectare in its allocations or on its brownfield register to meet at least 10% of its housing requirement. We could not find any evidence presented by the Council on this matter. If the Council cannot meet this requirement it will need to provide strong reasons as to why this cannot be achieved.

H2 - Affordable Housing

24. The Council recognises that the NPPF requires local councils to ensure that the contributions required from development should not undermine the deliverability of the local plan. However, the Council have not published any viability evidence as part of this consultation and as such we cannot comment on whether the requirement for all sites of over 10 units to deliver 40% of homes as affordable units is sound. However, we would like to make some broad comments on viability for the Council to consider in taking the plan forward. Alongside these broader comments on viability the HBF are also concerned that the policy is inconsistent

with national policy by requiring financial contribution from developments of between 5 and 9 units.

Viability

25. As mentioned above the Council have not published a viability assessment as part of this consultation, so it is not possible to say whether this policy is justified, and that development will be deliverable when all the costs placed on it by the local plan are taken in to account. However, in considering the impact of these costs and the approach taken with this policy it is important, as set out in paragraph 58 of the NPPF that the Council are confident that decision makers can assume a development meeting all costs is viable given that the Government are seeking to reduce the number of sites on which affordable housing contributions are negotiated. This may require a policy that varies such requirements on the basis of location or type of development reflecting the different costs and values that occur across the Borough.
26. In order to assist local planning authorities in preparing their viability assessments the HBF have prepared a briefing note setting out our members key concerns with regard to viability testing and the approach taken by Councils which is attached to this response. Whilst this note focuses on all aspects of the viability testing of the residential development and should be taken into account, we would like to highlight four particular issues with whole plan viability assessments.
27. The first issue is with regard to the approach taken to abnormal infrastructure costs. These are the costs above base construction and external costs that are required to ensure the site is deliverable. Prior to the 2019 NPPF viability assessments have taken the approach that these cannot be quantified and were addressed through the site-by-site negotiation. However, this option is now significantly restricted by paragraph 57 of the 2019 NPPF. As such these abnormal costs must be factored into whole plan viability assessments. We recognise that the very nature of an abnormal costs is difficult to quantify, but it is a fact that they are often substantial and can have a significant impact on viability. Where and how these costs arise is also variable. They can occur in site preparation but can also arise with regard to the increasing costs of delivering infrastructure, such as upgrades to increase the capacity of utilities. It is also the case that abnormal costs are higher on brownfield sites where there can be a higher degree of uncertainty as to the nature of the site and the work required to make it developable.
28. Whilst the HBF recognise that abnormal costs are expected to come off the land value, we are concerned that if abnormal costs are high then it will result in sites not being developed as the land value will be insufficient to incentivise the landowner to sell. It is therefore important that a significant buffer is included within the viability assessment to take account of these costs if the Council are to state with certainty that those sites allocated in the plan will come forward without negotiation.

29. Secondly, we would encourage the Council to use the upper end of any of the ranges suggested with regards to fees and profit margins. Again, these will vary from developer to developer but given that the Government want to minimise negotiation on planning obligations it would make sense to use the highest point of any range. The changing landscape with regard to viability assessment could lead to development slowing significantly if the correct variables are not taken into account.
30. Thirdly, the council must ensure that all the policy costs associated with the local plan are included within the viability assessment. Whilst affordable housing and infrastructure contributions from the majority of the additional costs that are placed on developers by the Council it is important that the cumulative impact of all policies are tested. With regard to the local plan review the Council will need to consider the impact of its proposed policies on biodiversity net gains, electric vehicle charging, sustainable design and construction; and renewable energy. The viability assessment will also need consider the impact of future national policies on viability and whether there is sufficient headroom to ensure these standards can be addressed alongside the policies in the local plan.
31. Finally, the approach to land values needs to be a balanced approach and one that recognises that there will be a point at which land will just not come forward if values are too low to take account of policy and infrastructure costs. There are a variety of reasons why a landowner will look to sell their land and it cannot be assumed that they will absorb significant reductions in land values to meet policy costs. Land is a long-term investment and the returns being offered must take account of this.

Requirement for financial contribution from development of between 5 and 9 units.

32. Policy H2 states that development of between five and nine units will pay a financial contribution in lieu of onsite affordable housing provision. As the Council note on page 61 of the consultation document the NPPF clearly states at paragraph 64 that contributions for affordable housing should not be sought on residential developments that are not major development. The Council's justification for such an approach is that affordable housing needs are so acute that a financial contribution is required and that it will not adversely affect viability of such development.
33. Before considering the Council's justification it is worth reiterating why the Government introduced this particular policy. The Ministerial Statement that preceded the amendment to the NPPF was clear that the reason for introducing this policy was to "*ease the disproportionate burden of developer contributions on small scale developers*". This is distinct from whether or not such development is viable in general but whether they are a disproportionate burden on a specific sector that faces differential costs that are not reflected in general viability assessments. These costs have led to a reduction in the number of small and medium (SME) sized house builders. Analysis by the HBF shows that over the last

30 years changes to the planning system and other regulatory requirements, coupled with the lack of attractive terms for project finance, have led to a long-term reduction of total SME house builder numbers by about 70% since 1988. The Government is keen to reverse this trend and increase the number of small businesses starting up and sustaining this activity. Improving business conditions for SME home builders is the key to long-term supply responsiveness. Therefore, whilst the financial contributions may not make such schemes unviable they will still place a disproportionate burden on smaller housebuilders and in particular new housebuilder seeking to enter the market.

34. With regard to the acuteness of the affordable housing needs, whilst we would not dispute this assertion, we do not consider this to be a reasonable justification. Firstly, when introducing this policy, the Government was aware of the acuteness in the need for affordable housing yet still introduced the policy, clearly recognising the wider benefits of supporting smaller housebuilders. Secondly, there is no evidence presented as to how many affordable homes are likely to come forward from these payments or whether it will merely support the provision of affordable homes that would come forward anyway. Finally, the Council were concerned about the acuteness of this issue they would allocate further sites, as is suggested in paragraph 2a-024 of PPG, in order to help deliver the required number of affordable homes. As the Council note they will fall short of meeting affordable housing needs in full and the allocation of additional sites would be the most effective mechanism for addressing the acute need for these homes.

H6 - Housing Mix

35. Policy H6 requires all homes to be M4(2). The HBF and its members recognises that some homes will need to be built to either M4(2) or M4(3) however, we are concerned that sufficient evidence has not been presented by the Council to justify the Council's policy in line with what is required by national policy and guidance. Principally whilst the Council have presented evidence as to how many households will potentially contain an individual with a long-term health problem or disability, they have not considered whether the requirements of those individuals in need of adaptations could have those needs met in their current home or indeed within a home built to M4(1) of the building regulations. It must be remembered that many of the adaptations required to by an individual with a long-term health problem can be made to most homes, with relatively few people needing to move to a home built to a higher accessibility standard to have their needs met.
36. For example, The English Homes Survey also found that in 2014-15, 81% of households that required adaptations in their home, due to their long-term limiting disability, felt their current home was suitable for their needs and that only 10% of those households whose home required an adaptation were trying to move somewhere more suitable. So, whilst there are a growing number of individuals with long term health conditions and disabilities this does not directly lead to the need for all new homes built to higher accessibility standards. An ageing

population will lead to more people who are likely to have a mobility problem but not necessarily more people who need a new home built to the M4(2) standard. Many older people, and indeed those of all ages with a long-term limiting illness or disability, will be able to adapt their existing homes to meet their needs and do not need to find alternative accommodation. It is also the case that for many people a new home built to the mandatory M4(1) standard will offer sufficient accessibility and adaptability throughout their life.

H9 - Self build

37. The HBF is supportive of the self and custom housebuilding market and as such it will be important for the Council to consider whether it can allocate additional small sites for such development on the edge of settlements. Specific and relatively small-scale site allocations for self-build and custom housebuilding would support this sector and ensure it has a range of appropriate sites in the right location whilst also providing additional homes rather than merely changing the way a unit is delivered on larger allocated sites.

Policy E10 - providing local employment skills

38. Whilst the HBF understands that the Council wishes to improve opportunities for the residents to Hertsmere to enter the construction industry it is not clear how this is considered to be justified against the tests set out in paragraph 57 of the NPPF and regulation 122 of the CIL Regulations. Planning obligations must be necessary to make the development acceptable in planning terms and the Council will need to provide the necessary evidence supporting this policy. Should the Council provide sufficient justification it will also be necessary to ensure that the costs of such an approach are included within the whole plan viability assessment.

CC2 - Green House Gas reduction

39. This policy will require all residential development of more than 5 homes to achieve net zero emissions on site. As such it will require development to deliver energy efficiency improvements beyond current standards as well as ensure that any energy supplied to these homes is from zero carbon sources. Whilst 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, which has now become the Zero carbon Hub. 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.
40. A key finding of the Task Force, as set out in the delivery plan published in July, is the necessity 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. This is because there needs to be strong focus, as the industry transition to higher standards in 2025, on market creation as at present these are relatively small and weak. As such they are unlikely to be able to support the delivery, at present, of significant numbers of homes at higher standards which in turn will impact on deliverability if higher requirements are introduced by Councils through local plans. In order to build these markets requires the transitional approach that is being advocated by the Government.

41. In addition, the transitional approach 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. Poor installation due to a lack of skilled technicians will lead to poorly functioning units, poor energy performance and a lack of consumer confidence. House builders across the country will not want to move forward with schemes where there is not the skills to deliver those homes the required standard and as such this could delay delivery of new homes in Hertsmere.
42. The Government has been clear through both national policy and guidance that it supports a transition to a low carbon future (paragraph 152 of the NPPF) and the improvements to existing building regulations which will see buildings deliver a 31% improvement in CO₂ emissions on current standards moving to the 75% improvement in the future homes standard from 2025 provides that transition. As such the HBF do not consider that this policy requiring development to achieve net zero carbon on site is consistent with national policy.
43. Whilst we disagree with the Council's approach if the Council do move forward with this policy it will need to be clearly costed within the whole plan viability assessment. The costs of building zero carbon homes will be higher and when considered cumulatively alongside other costs being placed on development could impact on the deliverability of some schemes and require adjustments to other policy requirements.

DL2 – High quality safe and accessible development

44. The HBF do not consider the Council to have provided the necessary evidence to justify the requirement for all new homes to meet spaces standards and that the requirement to meet the highest standards of the BRE Homes Quality Mark, or other equivalent measures to be justified or consistent with national policy.

Space Standards

45. Policy DL2 requires all homes to meet the National Described Space Standards (NDSS). However, we could not find any evidence to support the adoption of the National Described Space Standards. It is important to recognise that the optional technical standards can, as set out in paragraph 56-002 of Planning Practice Guidance (PPG), only be introduced where they are needed and where they do

not impact on the viability of development. The application of space standards has been considered in the viability assessment, however no we could not find any evidence as to the need for such standards that has been published by the Council.

46. Whilst the HBF share the Council desires to see good quality homes delivered within Hertsmere 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, for example, 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 it is important that the Council can provide, in line with PPG, robust evidence that there is a need to introduce the optional space standards – that these standards are a must have rather than a nice to have policy.
47. The HBF is also not aware of any evidence that market dwellings in the district that do not meet the NDSS remaining unsold or that those living in these dwellings consider that their housing needs are not met. There is no evidence that the size of houses built are considered inappropriate by purchasers or dwellings that do not meet the NDSS are selling less well in comparison with other dwellings. The HBF in partnership with National House Building Council (NHBC) undertake an annual independently verified National New Homes Customer Satisfaction Survey. The latest survey published in 2021 demonstrates that 92% of new home buyers would purchase a new build home again and 91% would recommend their housebuilder to a friend. The results also conclude that 94% of respondents were happy with the internal design of their new home, which does not suggest that significant numbers of new home buyers are looking for different layouts or house sizes to that currently built.
48. Given that there is little to suggest that development below space standards is an endemic concern within the district we would suggest that the requirement to meet NDSS is deleted from the plan. This would give the Council greater flexibility to maximise the number of sites that are developable as well as extending consumer choice to more households.

Homes Quality Mark

49. The NPPF recognises at paragraph 133 the benefits of using tools for improving the design of development and their use in the in the development of schemes, in particular large-scale housing and mixed-use developments. However, whilst the NPPF supports their use in helping to bring forward well designed schemes and that they should have regard to the outcome of any such assessments it should not be setting specific requirements to specific standards within these assessment frameworks.

50. We would therefore suggest the policy amended to outline that the Council will expect large scale development to use assessment frameworks, such as the BRE Homes Quality Mark and that the Council will have regard to the outcomes of the assessment framework in any decision. Such an approach would be more consistent with what is proposed in paragraph 133 of the NPPF.

Repetition

51. Finally, the policy repeats the need for homes to be accessible in accordance with policy H6 and tenure blind in accordance with H2. There is no need to repeat these requirements and the Council should decide where they are most appropriate and refrain from unnecessary repetition.

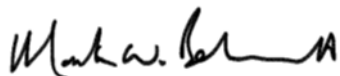
ST5 – Electric vehicles and mobility initiatives

52. Recent Government announcements indicate that all new homes will be required to have access to an electric charging point and the Council will need to reflect on these changes once they are introduced and whether the policy in part i. is necessary. With regard to part iv. of this policy the HBF does not consider it to be justified, as set out in part b, for developers to establish or make contributions to the establishment of new car clubs. We accept the principle that parking spaces should be made available for such clubs but it then for the market and the specialist companies operating in that market to provide the actual schemes. There is no justification for the development industry to deliver or subsidise car clubs and this requirement should be removed.

Conclusion

53. We hope these representations are of assistance in taking the plan forward. Should you require any further clarification on the issues raised in this representation please contact me.

Yours faithfully



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