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10/12/2021

Dear Sir/ Madam

### **Response by the Home Builders Federation to the consultation on preferred options for the Greater Cambridge Local Plan**

1. Thank you for consulting the Home Builders Federation (HBF) on the Greater Cambridge 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.

#### **Housing needs**

2. It is being proposed that the local plan include a housing requirement of 44,400 homes over the plan period 2020 to 2041, the equivalent of 2,111 dwellings per annum (dpa). This level of need is higher than the minimum housing need established using the standard method by some 40%. The HBF supports the Councils' ambitions to go beyond minimum needs and considers its approach to be consistent with national policy and guidance. As the Council note in the consultation document and supporting evidence, paragraph 61 of the National Planning Policy Framework (NPPF) is clear that the local housing needs assessment is the minimum number of homes the Council should be planning to meet with Planning Practice Guidance (PPG) outlining that there will be circumstances where housing needs will be greater than that arrived at using the standard method. In this case it is clear that the level of jobs growth in the Greater Cambridge area and the need to reduce the level of in-commuting to the area (in line with paragraph 104 and 105 of the NPPF) is sufficient justification to support a housing requirement in excess of the standard method.

#### **Housing Supply**

3. With regard to housing supply the consultation document outlines the Councils' intention to ensure a buffer of at least 10% between housing needs and supply. The inclusion of a buffer in supply is welcomed, however the HBF recommends



that such buffers should be at least 20% in order to offset the potential risks that development will not come forward as planned. Whilst the Council have examined the issue of delivery in relation to its sites and delivery trajectory in its Housing Delivery Study there is always uncertainty when bringing forward strategic sites of the size allocated in this local plan, and it will be important to ensure that these risks are mitigated through a higher buffer and the inclusion of additional development sites.

4. In addition, the level of windfall that is being proposed by the Council is significantly higher than in the past. Whilst the evidence suggests that windfall development has been higher than previous estimates indicate, it is important to remember there is a finite supply of previously developed land in the Borough and as such fewer homes will come from such sites in future. However, it is difficult to say how steeply this decline will be and as such the HBF advocate caution in the level of supply expected to come forward from windfall sites, especially where these include larger windfall sites which come forward with less regularity and certainty. Given the relatively high level of windfall that is expected across Greater Cambridge we would suggest that the Council either increases supply as outlined above or applies a discount to offset any potential future decline in delivery from windfall.
5. The Housing Delivery Study sets out the trajectory for each site that contributes to the overall supply across the plan period and makes an assessment as to the likely five-year land supply on adoption. The HBF does not comment on the deliverability or developability of individual sites, but we note that the expectation is that the five-year housing land supply on adoption in 2025 will be 5.15 years. This is a marginal five-year housing land supply and one that could easily fall below five years between now and the point at which the plan is examined and adopted should sites not come forward as expected. As such we would recommend that the Council give more consideration to allocating small sites of less than one hectare in the local plan that would bolster the Councils' housing land supply in the first five years following adoption.
6. In particular it will be important for the Council to show that they are meeting the requirements of paragraph 69 of the NPPF and have identified through the local plan, or the brownfield register sufficient sites of one hectare or less to accommodate at least 10% of the housing requirements. The Council state that they will exceed this requirement by some margin but include windfall sites in this assessment. As these sites are unknown to the Council, they cannot be considered to have been identified through the plan making process. Whilst they may come forward the intention of paragraph 69 is to provide the certainty to small and medium sized house builder that comes from having their sites allocated for development in the local plan. Therefore, the Council must be able to demonstrate it can meet the requirements of paragraph 69 either through allocations in the local plan or on sites identified on the Brownfield register. If they cannot meet this requirement of national policy the Councils must allocate such sites for development in the local plan.

7. Finally, the Councils propose to use the dwelling equivalent set out in the Housing Delivery Test in relation to the delivery of communal housing. Whilst the HBF acknowledges that some allowance can be made for communal housing in the housing supply estimates we consider it important that local evidence is provided with regard to equivalency rate for student housing. The equivalency rate in some areas will be significantly higher than the national average 2.5 students to each student house. In some areas this will be much higher and in order to ensure that supply of homes returning to the open market as a result of student accommodation being provided is not overestimated and it will be necessary for some local justification to be provided on this matter.

## **Viability**

8. In order for a local plan to be considered sound paragraph 34 requires local authorities to ensure that the cumulative impact of the policies it contains does not undermine its deliverability. It is therefore essential that the viability assessment underpinning the local plan takes into account all the policy costs being imposed on development across the plan period and that benchmark land values are accurate. As such it will be necessary for the Council to consider the impact of the following costs which have been underestimated in the viability assessment.

### *Policy costs*

9. The approach taken to First Homes in the viability assessment has been to treat them as an affordable housing product with regard to costs and their risk profile. Whilst First Homes are an affordable housing product they are marketed and sold by the developer. As such the costs and risks related to the sale of such housing when considered in any viability assessment should reflect those for market housing and not affordable housing. In particular the return on such homes should be set at those for market housing and not the 6% return usually expected for affordable housing.
10. The Council are proposing a 20% net gain in biodiversity on all sites at a cost of £1,211 per unit for Greenfield sites and £289 per unit on brownfield sites. These costs are based on the impact assessment on biodiversity net gain produced by Defra. However, this assessment is based on scenario B and the assumption that the additional 10% net gain will be delivered wholly on site. Firstly, it cannot be assumed that the additional 20% net gain could be delivered wholly 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 indication 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 circa £60,000 per hectare, a

considerable additional burden and one that could impact on the viability and deliverability of some sites.

11. Secondly, even if delivery could be achieved on site a higher net gain requirement would require more land reducing the developable area of a site, reducing the gross development value and site viability. This is an issue that does not appear to have been considered in the Government's impact assessment nor by the Councils' viability assessment.
12. The viability assessment includes a figure of £1,000 per electric vehicle charging point (EVCP) and £2,500 for a multi-charging point for every 4 flats. However, the HBF would consider this assessment as to the cost to be too low. 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 assesses the cost of installing an electric vehicle charging point 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.
13. The HBF and its Members 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 in this local plan and under the Future Homes Standard. These costs can be substantial and can drastically affect the viability of developments.
14. 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. Following the Government's announcement that all new homes with a parking space will be required to have a EVCP fitted from 2022 the details of this announcement are still to be set out in detail. However, the Government's proposal from its consultation in EVCPs in 2019 was to automatically cap charges to developers for upgrading local electricity networks at figure of £3,600 per charge point so clearly the costs could be significant and should be included in the viability assessment.
15. Finally in relation to policy costs, the Councils' viability assessment does not consider this policy can be delivered at no extra cost. However, this position fails to consider whether such measures will reduce the number of homes that can be delivered on site nor the potential need, as set out in the policy, for mechanical ventilation where passive or natural cooling mechanism cannot be delivered. It is important that these costs are factored into the viability assessment to ensure they are fully considered.

### *Land values*

16. The HBF are concerned that the land values used in relation to brownfield sites appear to be low for an area with a strong economy. Evidence from the VOA published by the Government on land value estimates indicates that in 2019 industrial land was valued at £1,100,000 per hectare, edge of centre office space at £24m per hectare and out of town office space at £3.9m. All these are significantly higher than the £988,400 used in the viability assessment and will have an impact as to whether such sites are viable alongside all the costs being placed upon them by the Council. As such the land values for brownfield sites should be reconsidered and increased to reflect these higher existing use values for brownfield land in the Greater Cambridge area.

### **Water supply**

17. The Councils' Integrated Water Management Plan indicates that current levels of abstraction from the chalk aquifer used to supply the Greater Cambridge area are unsustainable. As such the study outlines that there is a need for new strategic water supply infrastructure in order to provide for the longer term needs of the area if development is to be delivered beyond those levels already agreed as part of current Water Resource Management Plans (WRMP). The Councils highlight that a new WRMP is being prepared to cover the period to 2050 and it will be important that the proposed level of growth set out in this plan can be accommodated moving forward. Water companies have a statutory duty to develop and maintain an efficient and economical system of water supply in their areas and the Councils and relevant water companies need to ensure that the necessary resources and infrastructure are in place to secure the necessary supply required to meet the demands of not only Greater Cambridge, but all those areas affected.
18. If the necessary infrastructure is not in place a stepped requirement may be necessary but should be seen as a last resort. It will also be necessary, as set out in paragraph 68-021 of PPG, that the Councils will need to ensure that planned housing requirements can still be met within the plan period and does not become continually delayed.

### **Settlement hierarchy**

19. The HBF do not agree with the proposed policy that will limit the size of schemes within minor rural centres, group villages and infill villages. To set an indicative maximum scheme size fails to recognise the full potential of a site in such locations nor the potential benefits of such schemes in ensuring existing services remains sustainable into the long term. As such maximising development opportunities in such communities could have longer term sustainability benefits by ensuring existing services are maintained and, in some circumstances, new services are provided to the benefit of these communities. Rather than place an arbitrary limit on the size of development in these communities we would suggest a more appropriate approach would be to reflect paragraph 124 and 125 of the NPPF to

make the most effective use of land whilst taking into account housing needs, market conditions, infrastructure and serves as well as the character of the area. Such an approach would provide the necessary flexibility to maximise delivery whilst also taking into account wider considerations regarding the wider sustainability of such sites.

### **Settlement boundaries**

20. Whilst the Council reference rural exceptions sites in this policy no mention is made to First Home exception sites. Given that First Home exception sites are referred to in policy HE/S the Councils must ensure that policy S/SB refers to both rural exception sites and first homes exception sites in order to maintain consistency between these two policies.

### **Net zero carbon new buildings**

21. Parts A and B sets specific standards for space heating and energy use. The HBF recognises the need to move 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 on changes to Part L and Part F of the Building Regulations for new buildings published early in 2021 establishes a clear timetable for the transition to lower standards having regard to Government's legal commitment to be zero carbon by 2050. The transition to the Future Homes Standard in 2025 allows for an interim uplift that will require homes produce 31% less CO<sub>2</sub> emissions compared to current standards.
22. 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 interim uplift will see significant improvements on existing standards and allow the industry to ensure that by 2025 it is able to deliver the Future Homes Standard – which will require new homes to 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.
23. The HBF supports the Government's approach in allowing for a transition to the Future Homes Standard and the significant improvements this achieves as it recognises the difficulties and risks to housing delivery given the immaturity of the supply chains necessary to deliver the technologies required to meet the higher standards being proposed. Therefore, to support the industry, achieve the ambitious goals set by Government the HBF established a Future Homes Task Force to develop workable solutions for the delivery of the home building industry's contribution to meeting national environmental targets and objectives on Net Zero.

24. Early collaborative work is focussed on tackling the challenges of implementing the 2025 changes to Building Regulations successfully and as cost-effectively as possible, in particular providing information, advice and support for SME developers and putting the customer at the centre of thinking. To drive and oversee the plan, a new delivery Hub (<https://www.futurehomes.org.uk/>) has been launched by the HBF with the support and involvement of Government. The Hub will help facilitate a sector-wide approach to identify the metrics, more detailed targets where necessary, methods and innovations to meet the goals and the collaborations required with supply chains and other sectors. It will incorporate the needs of all parties including the public and private sector and crucially, consumers, such that they can all play their part in delivering environmentally conscious homes that people want to live in.
25. The Government's proposed approach which delivers a transition to low and zero carbon homes in line with its legal commitments is also reflected in national planning policy and guidance. Firstly paragraph 152 of the NPPF is clear that the planning system should support a transition to a low carbon future. As set out above a transition is necessary to ensure that homes can still be delivered before the higher standards required from 2025 come into force.
26. Secondly, the Government have now set out in Planning Practice Guidance the level of improvement to CO<sub>2</sub> Councils can require through their local plans. As the Council note in the consultation document the Government have confirmed that local authorities are able to set policy requirements related to carbon reduction in their local plans. However, paragraph 6-012 of PPG states that for new housing this can only be up to the equivalent of level 4 of the Code for Sustainable Homes. This is roughly the equivalent to a 20% improvement on the 2013 Building Regulations and will soon be superseded by the proposed changes to building regulations. Indeed, by the time this local plan is expected to be adopted in 2025 the future homes standard will be in place requiring a 75% improvement in CO<sub>2</sub> emissions.
27. Therefore, the policy being proposed which sets its own standards for operational emissions in new homes is not consistent with national policy. The HBF considers that the Councils should comply with the Government's intention of setting standards for energy efficiency through Building Regulations and not set its own standards as part of the local plan. The key to success is standardisation and avoidance of individual Councils specifying their own policy approach to energy efficiency, which will create difficulties by creating an entirely separate requirement alongside that of building regulations. Indeed, the Councils' own evidence for its proposed standards notes that for houses the recommended building fabric values are not much different to the Government's proposed Future Homes Standard that will be enforced from 2025. As such the Councils proposed approach to energy use and efficiency in policy CC/NZ will only cause confusion in its implementation and enforcement with seemingly little additional improvement in energy efficiency.

28. Part C requires development to generate the same amount of renewable energy as they demand over the course of the year. Whilst the NPPF requires development to comply with policies relating to decentralised energy supply it is also necessary to recognise, as set out in paragraph 157 of the NPPF, that the implementation of such policies must have regard to site specific viability and deliverability. In some case it may not be possible to meet the required standard, and this should be recognised in the policy. The policy also makes no allowance for the decarbonisation of the national grid through the increasing level of supply from renewable sources of energy generation. Such improvements will need to be taken into account within any assessment of energy use and the level of onsite renewable energy that is required to be generated.
29. Part D allows for offsetting of carbon emissions in exceptional circumstances and that an assured performance method be used to ensure operational performance reflect design intentions. Firstly, the HBF consider that offsetting should not be a requirement of the local plan where it is not feasible to deliver local plan requirements for decentralised energy supply. Development should deliver the energy efficiency improvement required by building regulations and where feasible and viable meet some its energy demand through onsite renewable energy generation. Further offsetting should not be required. Secondly, with regard assessing operational performance, and as highlighted above, the most effective mechanism for ensuring a building is built to the required standard is through building regulations. By requiring additional standards, the Council will require additional assessments to be applied in parallel to building regulations creating confusion and adding costs. As we state above the most effective mechanism for delivering improved energy efficiency in new homes is through the nationally applied change to building regulations being proposed through the Future Homes Standard.

### **Water efficiency in new development**

30. The Council recognise that this policy requirement is significantly lower than the minimum allowable technical standard for water efficiency as set out in PPG. The reason for placing an 80 litres per person per day is due to the unsustainable levels of abstraction from the chalk aquifer used to supply the Greater Cambridge area. However, the Council have noted that the position with regard to future supply and the necessary infrastructure to meet demands is still uncertain and that more detail will be known on publication of the net Water Resource Management Plan in 2022. Clearly should the necessary infrastructure be provided to address the demands in this area then the Council will need to review the necessity of the 80 litre per person per day requirement.

### **Designing for a changing climate**

31. Firstly, and as noted earlier in this response, the Councils' viability assessment consider this policy to be deliverable at no extra cost. However, there could be



additional costs associated with this policy and it will be necessary that these extra costs are factored into the viability assessment to ensure they are fully considered.

32. Secondly, whilst the HBF accept that new homes must be designed to take account of the impacts of climate change we do not agree with the Councils' assertion that they should be designed using the Good Homes Alliance Overheating in New Homes Tool and Guidance. As such we would suggest that any references to such toolkits are made outside of policy.

### **Reducing waste and supporting a circular economy**

33. Whilst the HBF and our members understand the need to reduce waste and promote recycling within development we are concerned that such issue need to be set out in a separate statement to support the application. Councils are placing more and more requirements on applicants without having the resources and knowledge to assess these reports or provide the necessary advice and guidance to applicants on such matters. The housebuilding Industry recognises the need for a more circular economy and but any such requirements on such matter must be done through national regulation not through local plans to ensure they are applied consistently across the Country and can be delivered effectively.

### **Biodiversity and geodiversity**

34. The requirement for a 20% net gain in biodiversity is not sound. No robust justification has been provided as to why the Greater Cambridge area is any different to the rest of the country and should set a higher requirement for net biodiversity gains from new development. 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 the Greater Cambridge area. It is important to recognise that the Environment Act does not set this as a minimum and at present there is no suggestion that in future policy will allow for a higher requirement to be set in local plans.
35. As set out earlier the HBF also has concerns that the impact of a 20% requirement has not been fully considered. A 20% requirement will have a more considerable cost impact than as is suggested in the viability assessment and one that could impact on the deliverability of some sites. Therefore, we recommend that the policy is amended to ensure that it reflects the approach established in the Environment Act that requires a 10% net gain in biodiversity.

### **Creating inclusive employment and business opportunities through new developments**

36. Whilst the HBF understands that the Council wishes to improve opportunities for those living in the Greater Cambridge area 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 necessary evidence must be provided to support this policy.

37. As the Council note the construction industry already contribute to improving skills and opportunities through CITB, who are leading a variety of programmes to develop skills through the levy's paid by the construction industry and provide significant benefits in terms of local funding and employment opportunities. Whilst we recognise that the Council want to support local businesses get access to opportunities it is important to recognise that commercial interests in ensuring the most appropriate supplier in terms of skills and costs will be the priority for businesses and should not be compromised. Therefore, whilst we recognise that the Council may want to encourage such activities this should be left to the developer to decide the most effective approach to delivering their scheme.

### **Affordable housing**

38. As set out above the HBF has concerns that the viability assessment has underestimated some of the costs in relation to policies and land values. Given that affordable housing is the principal cost placed on development through local plans it will therefore be necessary to reconsider this policy through an updated viability assessment. It may be necessary to reduce the affordable housing requirement on some development typologies in order to ensure the local plan is consistent with paragraph 58 of the NPPF which states that decision makers should be able to assume that applications that comply with all policies are viable.

### **Housing Mix**

39. The HBF consider the threshold of 10 or more dwelling proposed in this policy is appropriate. This is a very small level of development on which to achieve the proposed mix set out on page 268. The type of development on smaller sites will be dictated by its size, location, and topography and in many cases, it will not be possible to deliver mix proposed. We would therefore suggest a higher threshold is applied of greater than one hectare. It is also important to recognise that the mix being suggested in the proposed policy is a snap shot in time across each local authority area. Therefore, in considering the mix of homes on any site the policy should ensure that decision makers and application should not only have regard to the relevant and up to date housing study but should also have regard to other relevant evidence on housing needs and supply.

### **Space standards and accessible homes**

40. This policy reflects existing policies in both the Cambridge City Local Plan and South Cambridgeshire Local Plan, and it will important that the Council has sufficient evidence to support their continued inclusion in the Greater Cambridge Local Plan. With regard to Part M4(2) we would suggest that some consideration be given to the accessibility of the existing stock and degree to which those with mobility difficulties will be able to adapt their own home to meet their needs. With

regard to both space standards and accessibility standards it will be necessary to examine the impact the implementation of these standards has had on development, in particular on windfall sites and whether it has limited opportunities in Cambridge. We note that the Homes Topic paper mentions that the application of part M4(2) has been challenging in some instances and it will be important that this policy is sufficiently flexible to ensure schemes where it is either unfeasible or unviable to deliver these standards can still come forward.

### **Specialist housing and homes for older people**

41. The HBF consider it important that local plans look to allocate specific sites to meet the needs of older people. In particular the Council must look, in the first instance, to allocate those sites submitted for older people's accommodation that are in the most sustainable locations close to key services. Whilst some provision will be necessary in the new settlements provision should not be concentrated solely in such locations in order to provide a range of specialist housing and accommodation for older people across Greater Cambridge. In addition, we would suggest that the local plan goes further and looks to set out in policy:

- a target for the delivery of homes for older people and maintains a supply of land to meet that target. Whilst we recognise that there is not a requirement in national policy for the Council to maintain a specific supply of accommodation for older people identifying the level of need and monitoring supply the HBF consider it to be necessary to ensure the effectiveness of this policy and its application. Such an approach would also ensure effective monitoring in relation meeting the needs of older people and encourage positive decision making if there is a deficiency in supply; and
- support and encouragement for older persons accommodation on brownfield and other land in established urban and suburban environments and which is not allocated (for example, windfall sites) given the increasing level of need and that older people are most likely to prefer to continue to reside in established areas with which they are familiar.

### **Self-build and custom housebuilding**

42. The proposed policy would require all development of 20 units or more to provide at least 5% of homes as plots for self-build or custom housebuilding. This policy is considered to be justified on the basis that since 2016 there have been 639 entries added to the self-build register for Greater Cambridge, an average of 140 per annum. It would therefore appear from the evidence presented by the Councils that there are relatively high levels of demand for self-build and custom house building plots. However, what is not clear is whether the Council have revisited this register to ascertain whether individuals on it are still looking to self-build or whether they have acquired a plot since asking to be placed on the register.

43. When registers have been reviewed in other areas Councils have seen numbers fall dramatically. For example, when Runnymede Borough Council reviewed their register and introduced an entry fee of £65 for the register, and a £60 annual fee for each year after has led to the numbers of interested parties on the register fall from 155 to just 3. Similarly, when Fareham Borough Council introduced an annual registration fee from 1st August 2017 and as a result (as set out at paragraph 4.25 of their 2017-18 AMR), the Council's Self Build Register recorded those 35 individuals initially signed up in the first base period, which ran from 21st March 2016 (the date the register was created) to 30th October 2016. Following the introduction of the fee, the number who wished to remain on the register dropped to 12, a reduction of 65%. Whilst we recognise that requiring a fee will have an impact, however, it also suggests that many on registers may no longer be interested in self-build, and it is important to review the register regularly.
44. It will also be necessary for the Council to establish how many plots would be delivered through this policy. We could not find this evidence in the relevant topic paper and in order for the policy to be considered sound it must be reasonably related to the demand for self-build plots in Greater Cambridge.
45. With regard to the timescale for the reversion of self-build plots to the developer if they remain unsold this should be as short as possible. The provision of self & custom build plots on sites of more than 20 dwellings adds to the complexity and logistics of developing these sites. It is difficult to co-ordinate the provision of self & custom build plots with the development of the wider site. Often there are multiple contractors and large machinery operating on-site, the development of single plots by individuals operating alongside this construction activity raises both practical and health & safety concerns. Unsold plots should not be left empty to the detriment of neighbouring dwellings or the whole development. Any differential between the lead-in times / build out rates of self & custom build plots and the wider site may lead to construction work outside of specified working hours, building materials stored outside of designated compound areas and unfinished plots next to completed / occupied dwellings resulting in customer dissatisfaction. As such we would recommend a 6-month timescale after which unsold plots revert to the developer. This time period should be sufficient if the demand for self-build plots is in line with the Council's expectations.

#### **Parking and electric vehicle.**

46. When considering this policy, it will be necessary for the Council to take into account the Government's policy on the delivery of electric vehicle charging points. The Government have indicated that this will become a requirement for all new homes with a dedicated parking space and is likely to set out the type of charging facility to be provided. As we set out in our comments on policy CC/NZ it will be important for the Council not to apply its own standards where these are set out in Building Regulations to avoid confusion and conflict between local and national requirements.

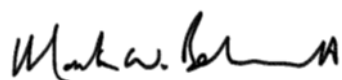
## **Digital infrastructure**

47. Under this policy residential developments will be expected to demonstrate that they have engaged with a range of providers to upgrade infrastructure to deliver gigabit-capable broadband infrastructure. The policy also requires residential developments will also deliver dedicated telecommunications ducting to facilitate the delivery of competitive fibre broadband services.
48. The Council should not impose new electronic communications requirements beyond the provision of infrastructure as set out in statutory Building Regulations. In the Budget of March 2020, the Government confirmed future legislation to ensure that new build homes are built with gigabit-capable broadband. The Government will amend Part R “Physical Infrastructure for High Speed Electronic Communications Networks” of the Building Regulations 2010 to place obligations on housing developers to work with network operators to install gigabit broadband, where this can be done within a commercial cost cap. The Department for Culture, Media and Sport (DCMS) has outlined its intentions on the practical workings of this policy, which will apply to all to new builds. Any type of technology may be used, which is able to provide speeds of over 1000 Mbps. All new build developments will be equipped with the physical infrastructure to support gigabit-capable connections from more than one network operator.
49. The Council’s approach is therefore unnecessary and repetitive of Building Regulations and should not be taken forward into the local plan.

## **Conclusion**

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

Yours faithfully



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