

Local Plan Consultation  
Bath & North East Somerset Council  
Manvers Street  
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SENT BY EMAIL  
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01/11/2022

Dear Planning Policy Team,

## **BATH & NORTH EAST SOMERSET LOCAL PLAN PARTIAL UPDATE: MAIN MODIFICATIONS**

1. Thank you for consulting with the Home Builders Federation (HBF) on the Bath & North East Somerset Local Plan Partial Update Main Modifications consultation.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

### **MM5: Policy SCR6 – Sustainable Construction Policy for New Build Residential Development**

3. The HBF continues to consider that Policy SCR6 is not sound as it is not justified, and it is not consistent with national policy. There is no justification for the specific requirements for new residential dwellings set out in Policy SCR6. Under the 2021 NPPF, the planning system should support the transition to a low carbon future in a changing climate (para 152) and any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards (para 154b). The NPPG sets out that any local requirements for a building's sustainability and for zero carbon buildings should be based on robust credible evidence and tested for impacts on viability (ID: 6-009-20150327). The NPPG also clarifies that locally set energy performance standards for new housing should not exceed the equivalent of Level 4 of the Code for Sustainable Homes and any requirement for a proportion of used energy to be from renewable and / or low carbon energy sources should be reasonable (ID: 6-012-20190315). Policy SCR6 should not undermine the Government's intention to set energy efficiency standards through the Building Regulations via the 2021 Part L Interim Uplift, which is effective from June 2022, and the 2025 Future Homes Standard.

### **MM7: Policy SCR8 – Embodied Carbon**

4. The HBF continues to consider that Policy SCR8 is not sound as it is not justified, and it is not consistent with national policy. The HBF maintains that there is no clear evidence



justifying the requirement for an Embodied Carbon Assessment demonstrating a score of less than 900kgCO<sub>2</sub>e/m<sup>2</sup> or for the site threshold of 50 dwellings, which will place unduly onerous requirements onto smaller sites and SME developers.

**MM9: Policy SCR9 – EV Charging**

5. The HBF consider that following the production of the Building Regulations Part S, this policy is no longer required, and its retention provides opportunities for conflicts between the planning decision making process and the building regulation requirements. The HBF recommends that this policy is deleted, as it creates unnecessary duplication.

**Future Engagement**

6. I trust that the Council will find these comments useful as it continues to progress its Local Plan to adoption. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
7. The HBF would like to be kept informed of the adoption of the Plan and any other consultations in relation to the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



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**Planning Manager – Local Plan (North)**

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