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06/01/2023

Dear Planning Policy Team,

**BARNSELY SUPPLEMENTARY PLANNING DOCUMENT: SUSTAINABLE CONSTRUCTION AND CLIMATE CHANGE ADAPTATION**

1. Thank you for consulting with the Home Builders Federation (HBF) on the Sustainable Construction and Climate Change Adaptation Supplementary Planning Document (SPD).
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.
3. This SPD is intended to supplement Policy SD1: Presumption in Favour of Sustainable Development, Policies CC1-6 and Policy RE1: Low Carbon and Renewable Energy of the Local Plan.

**Whole Life Carbon**

4. The SPD requires a whole life carbon (WLC) assessment for all major developments, it expects the assessment to follow the model set out by RICs. The HBF considers that if the Council is to introduce a policy in relation to WLC it will have to closely consider how it will be monitored and what the implications are for the preparation of any assessment, particularly in relation to how easily accessible any data is, and that it will have to take into consideration that much of the responsibility for emissions will lie in areas outside of the control of the homebuilding industry, including material extraction and transportation, occupation and maintenance, demolition and disposal. The Council will also have to consider how the policy will interact with other policies for example in relation to energy efficiency or resilience to heat, as well as the viability and delivery of development. The HBF is also concerned around the costs in relation to this requirement in providing the assessment and in addressing any issues it may highlight.



### **Future Homes Standard**

5. The SPD states that the Council expect new development to adhere to Building Regulation Standards, both current and proposed future amendments, as a minimum. It goes on to state that the Council welcome and encourage higher standards where possible. The HBF considers that the use of national standards and the use of the building regulations as a way to measure these standards is appropriate, and the potential for developers to go above these if they so wish to. However, this encouragement should not be taken as a requirement.

### **Sustainable Materials**

6. The SPD covers the use of sustainable materials, it sets a list of criteria, and suggests that the use of natural materials is to be preferred, it also suggests other materials that are favoured are those that benefit from appropriately recognised sustainability certification or endorsement. The HBF considers that the Council will need to consider the costs associated with the use of these sustainable materials and the potential impact that they may have on the viability of development. The HBF also considers that the Council will need to balance the sustainability of these materials with other policy requirements and other sustainability considerations.

### **Passive Design**

7. The SPD looks to encourage Passive House design in all homes where possible, and states that it is particularly encouraged in self build developments and any development within villages. As previously, the HBF has no issue with the Council encouraging Passive House designs, however, this encouragement should not be taken as a requirement.

### **Water Consumption**

8. The SPD states that all development should be designed to minimise the consumption of water and should make adequate and appropriate provision for water recycling. It also states that a condition on all planning permissions for the development of new residential development will be imposed to trigger the optional requirement under Part G of the Building Regulations 2010.
9. The Building Regulations require all new dwellings to achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure. The Optional Technical Housing Standard is 110 litres per day per person.
10. As set out in the NPPF<sup>1</sup>, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned. Therefore, a policy requirement for the optional water efficiency standard must be justified by credible and robust evidence. If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, then the Council should justify doing so by applying the criteria set out in

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<sup>1</sup> Paragraph 31

the PPG. PPG<sup>2</sup> states that where there is a ‘clear local need, Local Planning Authorities (LPA) can set out Local Plan Policies requiring new dwellings to meet tighter Building Regulations optional requirement of 110 litres per person per day’. PPG<sup>3</sup> also states the ‘it will be for a LPA to establish a clear need based on existing sources of evidence, consultations with the local water and sewerage company, the Environment Agency and catchment partnerships and consideration of the impact on viability and housing supply of such a requirement’. The Housing Standards Review was explicit that reduced water consumption was solely applicable to water stressed areas. Yorkshire Water and Barnsley are not considered to be an area of Water Stress as identified by the Environment Agency<sup>4</sup>. Therefore, the HBF considers that requirement for optional water efficiency standard is not justified nor consistent with national policy in relation to need or viability and should be deleted.

### **Viability**

11. It should be noted that PPG (ID: 61-008) states that ‘Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development.’
12. The HBF has concerns particularly in relation to the additional financial burden this SPD would create for developers. The HBF would strongly recommend that the Council undertake a full viability assessment of this SPD to ensure that it is viable and that it does not impact on the delivery of homes. The NPPF<sup>5</sup> establishes the importance of viability to ensure that development identified in the Plan should not be subject to such scale of obligations and policy burden that their ability to be delivered might be threatened.
13. The HBF is also concerned that this SPD is being introduced without the full consultation and examination that would have been given during the examination process, as would be befitting a new policy approach as is set out in this document. The HBF does not consider that this is appropriate and does not consider that this SPD should be taken forward at this time.

### **Future Engagement**

14. I trust that the Council will find these comments useful as it continues to progress its Planning Policy. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

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<sup>2</sup> ID: 56-014-20150327

<sup>3</sup> ID: 56-015-20150327

<sup>4</sup> 2021 Assessment of Water Stress Areas Update: <https://www.gov.uk/government/publications/water-stressed-areas-2021-classification>

<sup>5</sup> NPPF (2021) Paragraph 34

15. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,

A handwritten signature in cursive script, appearing to read 'J. Harding', written in black ink.

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

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