

## Home Builders Federation

### Matter 11

## MAIDSTONE LOCAL PLAN EXAMINATION

### Matter 11 Achieving Good Design

#### *Issue 1: Setting Design Expectations*

Q11.1 Will Policy LPRSP15 be effective and consistent with national policy in setting a strategic policy for securing good design in the Borough?

No comment

Q11.2 What is the role of the forthcoming Design & Sustainability DPD and what will be its relationship with the LPR? In respect of design and sustainable construction do the relevant LPR policies appropriately meet the challenge of climate change in so far as they can having regard to evolving Building Regulations, the specific requirements set out separately for Heathlands and Lidsing and viability considerations in general?

It is important that policies in relation to sustainable construction, and any guidance in future SPDs, are consistent with Building Regulations and the Government's approach to improving the energy efficiency of new homes. The Government are looking to deliver improvements in the energy efficiency of new homes to support national carbon reduction ambitions through building regulations which will deliver zero carbon ready homes through the Future Homes Standard. The HBF is supportive of this approach as it allows for development of key market and skills required to deliver zero carbon ready homes to be developed, ensuring delivery of the homes needed alongside the necessary improvements in energy efficiency.

Q11.3 Is the optional standard on water efficiency in Policy LPRQ&D1 justified?

No comment

Q11.4 Is the approach to energy efficiency for both residential and non-residential buildings in Policy LPRQ&D1 justified and effective? Should the policy be modified to



reflect recent amendments to Building Regulations in June 2022, as part of the incremental progress towards the Future Homes Standard by 2025?

There is no need for the Council to include reference to the latest Building Regulations within planning policy. The Government have set out a clear road map to achieving zero carbon ready homes from 2025 and there is no need to replicate this in the local plan.

Q11.5 Would Policy LPRQ&D2 provide an effective approach on external lighting, particularly in protecting dark skies in the Borough, including in and around the AONBs?

No comment.

Q11.6 Are the optional technical standards in Policy LPRQ&D6 justified, viable and their inclusion supported by proportionate evidence as referred to in the associated section of the Planning Practice Guidance<sup>3</sup>?

We could not find any evidence supporting the proposed adoption of the nationally described space standards. It is made clear in footnote 49 at paragraph 130 of the NPPF that evidence of need is required to support the adoption of these standards. Therefore, the Council will need to provide the necessary evidence if it is to adopt minimum space standards though this local plan.

With regard to Part M4(2) the Government have signalled in their response to the consultation on raising accessibility standards<sup>1</sup> that this will become the mandatory standard for all new homes. If this standard comes into force prior to the adoption of the local plan, we recommend that reference to it is removed from this policy.

Q11.7 Policy LPRQ&D6 requires all new homes to be built to optional standard M4(2). Policy LPRSP10(b) also sets this requirement for M4(2) in relation to affordable housing or should there be a reference to the higher M4(3) standard?

The HBF does not consider it necessary for the soundness of the local plan to make reference to part M4(3) of the Building Regulations.

Mark Behrendt MRTPI  
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<sup>1</sup> Raising accessibility standards for new homes: summary of consultation responses and the government's response, DHLUC (July 2022)