

Sent by email to: localplan@uttlesford.gov.uk

18/12/2023

Dear Sir/ Madam

Consultation on the Draft Uttlesford Local Plan

1. Thank you for consulting the Home Builders Federation (HBF) on the Draft Uttlesford 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.

Duty to co-operate and unmet housing needs.

2. Whilst the Government have committed to the removal of the duty to co-operate following the royal assent of the Levelling Up and Regeneration Act our understanding is that until enabling regulations are introduced the duty remains in force until it is replaced by an alternative approach to the consideration strategic and cross boundary issues affecting the local plan. As such the Council will need to take into account of one of the key challenges facing the south of England of unmet housing needs that have arisen due to constraints such as the Metropolitan Green Belt. It will be for the Council to work closely not only with neighbouring LPAs in Essex, Cambridgeshire, and Hertfordshire to ascertain whether there are unmet needs in those areas but also to consider whether the plan should increase supply to address the growing unmet needs for housing in London that will have an impact on those housing market areas that surround the capital.

3. The issue of unmet housing needs is discussed in the Interim Sustainability Appraisal. It highlights the risk of unmet needs from within Essex and that UDC will need to be mindful of the need to support the Greater Cambridge area should it not be able to meet its own housing needs. However, what is not mentioned is the significant level of unmet needs arising in London. It is important to recognise when considering unmet needs that the NPPF discusses neighbouring areas rather than local planning authorities. This is broader test that requires authorities to consider unmet needs on a more strategic basis. As the Council will be aware the mayor considers London to be a single housing market area (HMA) and this area adjoins, and has a significant influence on, the West Essex and East Herts HMA. As such it is necessary for those authorities in areas affected by the capital's housing market to take account of its unmet needs when considering the number of homes to be planned for.
4. 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 essential for areas affected by the London housing market and with strong links to the capital to consider how it could increase its own housing supply to address some of these unmet needs.
5. It is also necessary for the Council to recognise that the GLA has informed Councils across the south of England that it cannot meet its own needs and was seeking willing partners to provide support. This position is set out in paragraph 2.3.4 which states:

“... the Mayor is interested in working with willing partners beyond London to explore if there is potential to accommodate more growth in sustainable locations outside the capital ...”.

So, even if there is no direct plea for assistance there is a clear call for support that must inform the Council's decision making on housing needs and supply. Without any in depth consideration of London's unmet needs there is a risk that the plan will not be considered legally compliant. In particular it will require the Council to at least consider and appraise reasonable alternative spatial strategies that plan for a housing requirement that is substantially above the current requirements.

Core policy 1: Addressing Climate change.

6. This policy provides an overview of the Council's approach to addressing both the causes and consequences of climate change and acts a reference point as to those specific policies the council consider to be key with regard to this issue. In addition, the policy requires all applications for new residential development of one or more dwellings, non-residential development of 100 sqm or more and major applications for refurbishment and changes of use to submit a climate change and sustainability statement covering how the proposed development addresses each of these issues. Whilst the Council note that these should be proportionate to the scale of the development and reference table 4.1 it is notable that this table requires virtually the same level of evidence from all applications. The only difference is that smaller developments of between 1 and 9 dwellings must provide less detailed information with regard to use of materials and embodied carbon. This provides very little in the way of guidance to the decision maker or applicant as to what level of evidence is proportionate to the different scale of development. The Council should be far clearer as to its expectations to ensure that time and money is not wasted by applicants providing too much information that is not required or applicants being refused because of insufficient information.

Core Policy 2: Meeting our housing needs.

Housing needs.

7. The Council are proposing a housing requirement over the plan period of 13,680 homes. This requirement is consistent with the minimum number of homes the Council needs to plan for using the standard method of 684 dwellings per annum (dpa). However, given that the NPPF is clear that this is a minimum we would suggest that the housing requirement is prefixed as such.
8. The Council do not consider there to be exceptional circumstances to justify using an alternative method for assessing housing need. The HBF would agree with this position. The Council also do not consider that past delivery rates suggest a higher level of housing need or that the number of homes being planned for will act as a barrier to the economic growth of an area. However, the HBF would suggest that the Council work closely with the Greater Cambridge area to understand their growth aspirations and housing needs and

whether this will require more homes to be delivered in Uttlesford. In addition to these considerations the unmet needs of London must be considered and, as set out above, the HBF consider the scale of these unmet needs require the Council to test a housing requirement and spatial strategy that delivers growth that is above the minimum required by the standard method.

Housing supply

9. The council state that the plan provides for the delivery of at least 14,377 homes over the period providing a buffer between needs and supply of 717 homes. The HBF advocates all councils to include a buffer between housing needs and supply in order to ensure that any unexpected changes in the delivery of the sites allocated in the plan do not lead to the Council not meeting its housing needs. In effect the buffer ensures the council's plan is deliverable across the plan period as required by paragraph 35 of the NPPF. However, the HBF do not consider the 5% buffer being proposed by UDC to be sufficient. Whilst there is no hard a fast rule as to what an appropriate level of additional supply is necessary to ensure development needs are met the HBF consider a 10% buffer to be the minimum. This level of buffer is necessary to take account of the unforeseen circumstances that delay the delivery of sites and to offset what tend to be naturally optimistic assumptions made by both site promoters and the council and a tendency of all parties to plan for the best-case scenario.
10. A housing trajectory has not been included in the local plan. As the Council will be aware the NPPF states at paragraph 74 that strategic policies should include a housing trajectory illustrating the expected rate of housing growth over the plan period. Information on the expected rates of delivery on all sites is set out in Housing Trajectory paper however this trajectory does not include the non-strategic allocations mentioned in the table in Core Policy 2 as these are to be identified in the Regulation 19 local plan and as such we cannot comment at this stage as to whether the Council will have a five-year land supply on adoption.

Sites of no more than one hectare

11. In addition, the Council have not identified whether the proposed supply will ensure that at least 10% of the housing requirement will be delivered on small sites identified in this plan or in the brownfield register. Firstly, it is important to note that this a is a minimum figure, and

we would encourage the council to go beyond this in recognition of the importance of small sites in supporting SME house builders and the benefits this has not only to the variety of homes being provided in Uttlesford but also to the local economy. Allocating small sites and supporting SME house builders not only ensures a stronger supply in the short term but also improves the diversity of choice within local housing markets, support local and regional supply chains and are often pivotal in bring forward innovation and supporting jobs growth locally, with 1 in 5 of the SME work force comprising of apprentices.

12. A failure to allocate small sites will contribute to the continued decline in small and medium sized house builders. Recent research by the HBF has found that there are 85% fewer small house builders today than there was 20 years ago and that of a survey of 202 SME house builders 87% said they were considering winding up their residential activities in the next three years. Whilst this decline is due to a range of factors more allocations of small would ease the burden on many SME developers and provide more certainty that their scheme will be permitted allowing them to secure the necessary finance that is often unavailable to SMEs until permission is granted.
13. In seeking to meet this requirement of national policy the council must also ensure that these are sites that are either allocated in the local plan or identified in the brownfield register as being suitable for development. They cannot come from sites that have been delivered or from windfall. The NPPF makes a clear distinction in paragraph 69 of the NPPF with part a) setting out the 10% requirement followed by part c) which establishes that other policies in the local plan should be support the delivery of windfall sites. This is further reinforced in the Glossary which states that windfall developments are "*sites not specifically identified in the development plan*". In seeking to meet this provision of the NPPF ideally the Council would have in the first instance looked to allocate sufficient small sites and then looked to deliver the remaining homes on other larger sites. This would have been the positive approach to small sites that the Government is clearly looking to advocate through this policy.
14. However, the Council still has the opportunity to ensure that the 10% is delivered through allocations as part of the non-strategic site allocations that will be included in the next iteration of this local plan, and we would encourage the Council to prioritise small sites within this process. In order to be consistent with national policy the HBF recommends that Council should in the first instance identify sufficient allocations on sites of one hectare or less to meet 10% of its housing requirement. Once this is achieved then it should seek to identify the remaining supply from other sites. If the Council cannot meet the requirement of

paragraph 69a) then it should work proactively with SME housebuilders to identify additional sites for allocation. The HBF can help facilitate this engagement with its SME members if that would assist the Council.

Core Policy 22: Net Zero Operational Carbon Development

15. In recent years there has been some uncertainty as to the degree to which local planning authorities can require higher energy efficiency standards in new buildings in light of the improved building regulations which came into force in June 2022 which rendered the 2015 Written Ministerial Statement moot. The Government have now provided some clarity as to the policy position on this matter through a written ministerial statement (WMS) published on the 13th of December 2023¹. In this statement the Housing Minister notes that “*Compared to varied local standards nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes*” and that local standards can “*add further costs to building new homes by adding complexity and undermining economies of scale*”. The 2023 WMS goes on to state that any standard that goes beyond building regulations should be rejected at examination if the LPA does not have a well-reasoned and robustly costed rationale that ensures:

- That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.
- The additional requirement is expressed as a percentage uplift of a dwelling’s Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).

16. With regard to the first bullet point the HBF do not consider the council to have properly and fully considered the implications of this policy on the deliverability and viability of new development. Firstly, the proposed standards are higher than the proposed Future Homes Standard expected to be introduced in 2025 and seemingly will require higher levels of fabric efficiency. This will require new skills and materials that may not be readily available, and which could slow delivery the short to medium term as these are developed. As such consideration will need to be given as to the delivery rates of development in the early years

¹ [Written statements - Written questions, answers and statements - UK Parliament](#)

of the plan period with fewer homes potentially coming forward in this period as these much higher standards will take time to embed.

17. The Council must also ensure that the costs of its implementation are properly reflected in the viability evidence. The Viability Study states on page 47 that there are a range of sources as to costs and the assumption made is that it will fall in the range of an additional 8-10% on base build costs. This uplift is from the 2013 Building Regulation on the basis that current BCIS will not reflect the here part L standards that came into force in June 2022. The HBF considers this may be an underestimate of the costs. The Future Homes Hub has undertaken some work to support and inform the implementation of the Future Homes Standard which is set out in "Ready for Zero"². This study tests a number of archetypes against a range of specifications from the current standards set out in the 2021 Building Regulations through to standards that will achieve similar standards to those proposed by the Council, however it must be noted that these are based on the use of SAP which the Council consider to underestimate the energy efficiency performance of new homes.
18. "Ready for Zero" indicates that in order to deliver a similar standard to that being proposed by the Council would be around a 15% to 20% increase in per unit costs compared to the 2021 Building Regulations. Whilst the specifications and assessment methodology may not be directly comparable to those being proposed by the Council it provides an indication as to the costs and that these are likely to be higher than those proposed in the viability assessment.
19. The second bullet point in the WMS quoted above requires any policy to be expressed as a percentage uplift to the Total Emissions Rates calculated using the specified version of the Standard Assessment Procedure. As such the Council's policy, which requires development to achieve a specified level of space heating demand and energy use, is inconsistent with national policy. The Council will need to amend its policy in line with this statement and ensure that it is consistent with SAP.
20. We note that the Council state in paragraph 9.25 that an accurate predictive energy modelling, such as Passivhaus Planning Package or CIBSE TM54, should be used in the energy assessment. If the policy is considered to be justified, then any statement/ evidence required with regard to development achieving the standard set out in policy must also be

² Ready for Zero Task Group Report [Link](#) (Future Homes Hub, 2023)

based on SAP. The requirement of any other assessment package would be inconsistent with national policy.

Performance monitoring

21. Requirement 5 of this policy is that in addition to the predicted level of performance, all development will be required to submit as built performance information at completion and prior to occupation. Developments of a 100 or more dwellings will also be required in use monitoring for the first 5 years on 10% of dwellings. Firstly, the Council will need to ensure that the additional cost of testing of the energy efficiency levels of each home will need to be included in the cost of development. This does not appear to have been considered in the council's viability assessment. Secondly it is not clear as to the purpose of the in use energy assessment. It is not stated as to whether this will need to be submitted to the Council and if it must be submitted what the Council. Without any clear purpose as to what this requirement is seeking to achieve the HBF would recommend that it is unsound and is deleted.

Core Policy 23: Overheating

22. The HBF recognises the need for development to take into account overheating. However, we object to the inclusion of specified standards within the policy itself. Whilst the policy seeks to encourage their use the HBF would consider this should be part of the supporting text rather than policy to avoid decision makers expecting the use of the two performance standards set out in the policy.

Core Policy 24 Embodied carbon

23. No evidence has been provided as to the deliverability of the proposed targets. Whilst these may theoretically be deliverable there is no assessment as to the cost of achieving these; the impact on delivery timescales; and whether current environmental product declarations are sufficiently accurate and robust to enable a target-based approach to be adopted through planning policy.

24. The Council refer to the LETI/RIBA standard which itself acknowledges that embodied targets are a developing knowledge area. This position is reflected in reports produced by the Future Homes Hub which found that based on a small set of embodied carbon

assessment there were significant and unexplained variability between apparently similar buildings. This was potentially the result of differing assumptions, defaults and the EPDs selected by each assessor all of which were acceptable within the scope of the RICS professional standard. As is noted in the report this highlights the need for consistency and guidance for those carrying out assessments. The HBF is concerned that there is insufficient information to support consistent and effect assessment of embodied carbon in a development at this time for this policy to be effectively implemented. As such the HBF would suggest that the policy encourage development to reduce the level embodied carbon but not require it to achieve a specific standard.

Core policy 29 – Electric and low emission vehicles

25. This policy requires development to maximise the opportunity of occupiers and visitors to use electric vehicles and the provision of residential and public electric vehicle charging plug in points. The council should be clear that the requirement to provide electric vehicles in relation to new residential and non-residential development is set out in Approved Document S of the building regulations. A requirement to maximise could be taken as requiring development to go beyond these standards and the HBF would suggest that this policy is deleted.

Core Policy 34 – Water supply and Protection of Water Resources

26. Whilst it is important for water companies to reduce the abstraction of potable water the impact of new homes on abstraction is likely to be minimal with far greater gains being achieved through the prevention of leaks and improvements to the water efficiency of existing properties to ensure that they are as efficient as those built to the current standard of 110 litres per person per day (lppd). The Council point to the fact that the area is in an area of serious water stress but as the PPG notes this is part of the evidence required to implement the 110 lppd and as such cannot be the basis for a lower requirement.
27. The HBF are aware that lower standards are being adopted in the north of Sussex. However, this is not required on the basis of a shortage of supply but due to Natural England's concerns that abstraction is likely to have a significant negative impact on a protected habitat. As such local plans in that area must be able to ensure there is no further harm if development is to be permitted now and in future. Part of the mitigation strategy in this area is a lower water usage standard than those set out in the optional technical

standards in PPG. This standard, alongside other measures, is required to ensure the affected Councils in Sussex can conclude in their Appropriate Assessments that there will be no further harm from development to the protected area. This is not the case in Uttlesford and whilst there are concerns regarding water use these do not go beyond the consideration set out in PPG and as such the policy is unsound and the 90 lppd replaced with the 110 lppd.

28. The final part of this policy requires planning proposals and increase demand for off-site water or and sewage services will only be granted permission where sufficient capacity exists or where they can demonstrate extra capacity will be provided at time of occupation. This is unsound. Water companies are under a legal duty to provide water and sewerage services to new development. Section 37 of the Water Industry Act 1991, as amended by the Water Act 2014. The requirements of this policy would, consequently, be contrary to the approach that has been established nationally, and in law, as it places the onus on the applicant to demonstrate capacity rather than the provider of water services to ensure that it invests to meet planned requirements as established through this and other local plans. The Council therefore needs to work with the relevant water companies to ensure there is sufficient water resources to support new development across the plan period.

Core Policy 40: Biodiversity

29. The HBF does not consider the requirement for new development to deliver a 20% improvement in BNG to be sound. The HBF recognise that the Environment Act sets the 10% as a minimum and Government statements indicate that Councils can go further in local plans, but this needs to be justified and that there is both a need to go beyond 10% and that this requirement will not, when considered in combination with other policies impact on the deliverability of the local plan. Whilst the Council have considered this policy in the Viability Assessment it has provided no evidence as to why an additional 10% net gain in biodiversity is necessary to make development acceptable in Uttlesford. Without any justification as to why the policy is needed the 20% requirement is unsound. However, if 20% BNG requirement is retained the council need to set out that where 20% is not deliverable it will seek to negotiate the level that can be provided over the 10% minimum required by the Environment Act 2021.
30. The policy should avoid referencing specific metrics as these are likely to become out of date as national policy and legislation on BNG evolve. Whilst the HBF recognise that the

policy refers to successors to Metri 3.1 it would be more appropriate to simply state “...measured using the latest metric required by DEFRA”.

31. In same paragraph as 20% BNG council refers to creating sites of greater biodiversity or geological value. BNG refer to habitats and as such we cannot see the reason for improving geological value and its relevance in this paragraph. The HBF would recommend that the reference to geological value in this sentence is removed.

Core Policy 52 Good Design Outcomes and Process

32. The policy states that all major development should make use of pre application discussion with the local planning authority and others as appropriate. This is unsound. Whilst the HBF recognises that pre application discussions can be helpful they cannot be made a requirement of policy. It must be the choice of the applicant not the Council as to whether they chose to use pre application advice.

Development policy 9: Public Art

33. This policy sets out the need for major development to contribute to a public art fund. However, the HBF do not see how this is necessary to make development acceptable planning terms. Whilst public art in general may be important for the Council there is nothing in the evidence base to say why this is required to make development acceptable. The Council may want to encourage the inclusion of public art as part of the design of new development but there is no justification to require its provision or contributions to support its provision elsewhere in the Borough.

Core Policy 53: Standards for new residential development

34. The policy requires development to accord with most up to date Local Housing Needs Assessment. As the Council will be aware it cannot seek to set policy outside of the local plan by requiring development to accord with evidence or guidance. The HBF therefore recommend that the policy state that development should have regard to the most up to date evidence on housing needs and that where schemes diverge significantly from this mix

applicants will be required to prove that this is necessary on the grounds of an alternative assessment of need or viability.

35. The policy states that all residential schemes will be 100% wheelchair accessible before referring to the requirement for all homes to be built to Part M4(2) of the Building Regulations. The policy then states that 10% of market homes must be built to M4(3) and 20% of affordable homes M4(3). Firstly, the Government in responding to the consultation regarding accessible homes stated that they would make part M4(2) the mandatory standard. If this becomes mandatory prior to submission, then the Council will need to amend this policy to remove reference to M4(2). Secondly, the reference to 100% of homes being wheelchair accessible is confusing. Whilst M4(2) will allow a wheelchair user to visit a home the standard for a wheelchair accessible home is set out in M4(3)b). It is clear from the rest of the policy that it is not the council's intention to require all homes to meet this M4(3)b and we would therefore suggest that this first part of the opening sentence is deleted. The Council must also ensure that it clear that market housing will be expected to deliver wheelchair adaptable homes as wheelchair accessible homes, as outlined above, can only be required where the Council has nomination rights regarding the occupation of that property.

Core Policy 54: Specialist housing

36. CP 54 will require strategic housing sites to delivery 5% extra care dwellings (C3) as part of overall mix or alternatively an equivalent amount of alternative specialist housing for older people where extra care housing is not desirable in a particular location. Firstly, whilst the HBF welcome the inclusion of the stated need for specialist accommodation in paragraph 11.26 this would be more effective if it were included in policy with a stated aim that these needs will be met.
37. Secondly the HBF would suggest that the Council should not rely only on strategic sites to meet the need for specialist accommodation to the exclusion of standalone allocations for this type of development and in particular retirement accommodation. Whilst there is general support for such development the policy, we encourage the council to be more proactive in working with providers of this type of development to identify appropriate sites for allocation. This approach would provide far more certainty to the council that the need for such accommodation will be met in full.

38. Thirdly, it is also not clear what the Council is referring to in reference to extra care housing not being in a desirable location. The Council will need to be more specific as to what this means both in the policy itself and the supporting text.
39. Finally, the policy states that specialist housing will be required to meet the policy requirements of CP56: Affordable housing. We note that the Viability Assessment (VA) indicates at Table 2f in Appendix 2 that a scheme delivering 30 unit flatted sheltered accommodation on PDL is only viable at highest value points and at table 2i that a 60 unit extra care scheme on PDL is only viable at a 20% affordable housing requirement. The VA suggests that such schemes often attract a premium that will enable such development to achieve the policies being proposed but states that no direct comparable are available. Given that specialist housing must be located near to services it is often located on PDL and if such development cannot achieve these much higher values, it will be made unviable by the policies included in the local plan. It will therefore be necessary for the VA to provide some evidence as the values that can be achieved if it is to requires the full 35% affordable housing requirement to be delivered on specialist housing for older people.

Core Policy 55: Residential Space Standards

40. The HBF could not find any evidence relating to the need for the national described space standards. Footnote 49 of the NPPF and the relevant passages in the PPG state that the optional technical standard must only be adopted where there is an identified need. Without any evidence the Council must delete this policy as it is unjustified.

Core Policy 56: Affordable Dwellings

41. This policy requires all major residential development to provide 35% of the homes on site as affordable housing. As mentioned in our comments on CP22 the Council will need to update the viability assessment to take account of the higher costs of meeting the energy efficiency standards proposed in this local plan.
42. The policy states that the dwelling mix should accord with that set out in the LHNA. As we have already mentioned in our comments on CP53 the Council cannot require development to accord with documents or evidence that are not development plan documents. As such the policy should be amended to state that applicants should have regard to the LHNA.

43. Finally, the policy refers to the requirement set out in CP53 that 20% of affordable homes should be built to part M4(3). The HBF considers this repetition of a policy requirement to be unnecessary and recommends that it is deleted from CP56.

Core Policy 58: Custom and Self-Build Homes

44. This policy is set out in three parts with the first two elements looking toward decision making with regard to applications for self-build and custom house building on windfall sites or where the whole site is expected to be delivered as self-build or custom housebuilding, with the third part placing a requirement on developments of 100 homes or more to provide 5% of the units as serviced plots for self-build housing.
45. The HBF's concerns relate to the third part which we do not consider to be justified. In general, the HBF does not consider it appropriate for a blanket requirement for self-build homes on large housing sites to be appropriate as the deliverability of self-build plots will vary from site to site. On some sites it will not be possible for example that the provision of self and custom build plots on new housing developments can be co-ordinated with the development of the wider site. At any one time, there are often multiple contractors and large machinery operating on-site from both a practical and health and safety perspective, it is difficult to envisage the development of single plots by individuals operating alongside this construction activity.
46. However, alongside this broad concern the Council's own evidence suggest such a requirement is not needed with windfall sites coming forward to meet the demand for self-build plots in Uttlesford. The Council state at paragraph 11.48 of the Draft Local Plan that in the three year period ending in October 2022 the Council had permitted 278 plots. In addition, the evidence in figure 7.2 of the LHNA shows that since 2016 the council has permitted on average 134 dwellings for self-build or custom house building. This has comfortably met the level of demand in the Self Build register of 30 plots per annum. On the basis of this evidence there is clearly sufficient sites available in Uttlesford to support self-build without requiring larger developments to provide further plots. Whilst the LHNA points to broader evidence of demand it is not clear how relevant this information is to Uttlesford nor how NaCSBA arrived at the estimated demand for plots in Uttlesford.
47. The Council state paragraph 11.48 of the Draft Local Plan that that number of self-build plots is a result of a high level of speculative development that will reduce once the plan is

adopted. However, given that the council is not allocating small sites for self-build it is likely that this level of self-build will not have been affected by the lack of a local plan and will continue in future. As such the HBF do not consider the requirement for sites of 100 units or more to provide 5% of homes as plots for self-builders to be justified

48. Finally, if the third part of the policy is maintained the HBF would consider the marketing period of 18 months too long. If there is the demand for plots suggested by the Council, then a 6 or 12 month marketing period would be sufficient and would be consistent with the approach taken in many other local plans.

Core Policy 66: Planning for Health

49. The policy requires all major development undertakes a Health Impact Assessment (HIA). Whilst the HBF would agree that they are an essential part of plan making to ensure the Council understand the health outcomes it is seeking to achieve and creates a plan that seeks to deliver these. This should be achieved through the preparation of a whole plan HIA which will inform the Council that the policies it contains address the key health outcomes for the area. As the plan and the policies, it contains has been prepared to address the key health issues it is therefore unnecessary for future development proposals that accord with this plan to undertake a separate HIA. If a development meets the policies in the plan, then it is by default addressing the health outcomes already identified by the Council. An HIA as part of the application would merely be repetition of the work the council has already undertaken. The only circumstance where an HIA may be appropriate would be for a larger unallocated site where the impacts may not have been fully considered by the council as part of the plan wide HIA.
50. With regard to the other aspects of the policy set out in part ii and iii this seems to offer little to the decision maker with part iii merely repeating what will be achieved from other policies in the local plan. In fact, the approach taken by the Council reinforces the point made above that the range of policies in this plan already address the health outcomes identified by the Council and make an HIA or reference to health and well-being issues in the design and access statement to be unnecessary. Without a clear purpose CP66 is ineffective and should be deleted.

Future Engagement

51. I trust that the Council will find these comments useful. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry if that would be helpful. The HBF would like to be kept informed of the progress and adoption of the Local Plan. Please use the contact details provided below for future correspondence.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Mark Behrendt'.

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