

Sent by EMAIL ONLY to localplan@telford.gov.uk

31/1/2024

Dear Sir/ Madam

Response by the Home Builders Federation to the Telford and Wrekin Local Plan Review 2020-2040 consultation (Reg 18)

1. Please find below the Home Builders Federation (HBF) response to the First Draft Local Plan 2020-2040. 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.
2. HBF have not commented on every policy only those of relevance to our members.

General Comments

3. HBF welcomes the Council's efforts to ensure that they have an up to Local Plan. Plan-making is a fundamental part of a Local Authority's role and is essential to support the delivery new homes and jobs. HBF agree that there are many factors that support the need for a review of the Telford Local Plan. HBF support welcome plan proactive welcome approach pro-growth.
4. HBF note that this is consultation characterises the Reg 18 Local Plan consultation as part of a review and update of the Local Plan rather than a new plan. As this is approach being taken, then plan review should be looking at how well the ambitions and policies in adopted Local Plan are being delivered and what changes are needed to ensure delivery. In this regard, HBF welcomes the Council's past performance in housing delivery and the success of plan-making and effective housing supply. We note however that the majority of homes, some 55%, being 'planned for' in this plan have in fact already been built or consented.
5. As the current Telford and Wrekin Local Plan (adopted Jan 2018) covers the period from 2011-2031, a review of the delivery of that Plan should be ensuring the housing allocations and housing requirement to 2031 is being



met and what action is needed to address any shortfalls or difficulties. By extending the Plan period so that it runs from 2020-2040 the Plan should be planning for the continued growth of Telford and Wrekin going into the future. This should include setting a housing requirement that starts with the standard method, including any unmet need from elsewhere, and then considered if there are any other reasons that this figure needs to be higher.

6. Although, HBF is supportive of the Council's pro-growth approach, we would suggest that a plan for the next fifteen years where over half the housing has already been committed does not seem to set out a long-term vision for the area for the period beyond 2031, that continues to deliver housing in line with the pro-growth agenda and past delivery. It is important that the Plan does do this. HBF suggest planning for only 1,010 new houses per year should be the very minimum that is being planned for.

Need to reflect new Government Policy

7. It will also be important for the Council to consider the emerging Biodiversity Net Gain (BNG) PPG and DEFRA Guidance (of Dec 2023, with final version due to be published in Feb 2024), which HBF suggest should have an impact on this emerging Local Plan. HBF would strongly welcome further consultation on this issue.
8. We believe BNG should be a significant factor in emerging Local Plans and may require additional research, evidence work, policy and guidance for it to be made to work in practice. Plan-making is the appropriate stage for many BNG issues to be considered and we therefore suggest that the Telford and Wrekin Plan need to be reviewed and revisited to ensure that it is doing all it can to support the delivery of the national mandatory BNG policy through providing clear advice guidance and, wherever possible, certainty for developers and landowners and communities on what is expected.

Impact of new NPPF

9. HBF also note the recent (Dec 2023) changes to the NPPF and suggest it would also be helpful for the Council clearly set out in a statement their views on whether these changes have any impact on this current consultation exercise. Such a statement could explain their view on the implications, or not, of the recent changes to the NPPF on this Plan.

Section 2 *Vision, Priorities and Profile*

Vision for the Borough

10. Whilst HBF recognises the importance of green and blue infrastructure, and the need for the plan to address key environmental issues including addressing climate change and helping deliver mandatory BNG, at its heart a development plan should be about guiding and delivering new development.

HBF suggest the role of new housing in creating a sustainable Borough could be more explicitly recognised within the vision itself.

11. HBF suggest further explanation is also needed on what is intended by the term 'Forest Community' right at the beginning of the Plan. Within the document it is referred to as a policy, an approach and an ethos, without offering a clear definition or explaining how this impacts the Vision for the Plan. It would be helpful for the Plan to more clearly set out how the Forest Community and natural environment policies are intended to interact with new housing and other development. HBF suggest further thought should be given to the role and benefits of new housing development within the Plan, and the Vision could usefully reflect this.

Priorities

12. Although HBF is pleased to see securing better homes for all as a priority, the subsequent wording of that section refers only to delivering affordable housing. The Plan should recognise that there will also be a role for open market housing in meeting the housing needs of the Borough.
13. In relation to the Objectives listed after para 2.10, HBF have concerns about the amount of housing being planned for and the introduction of local policies and standards that deviate from Building Regulations. These comments are addressed in more detail in response to those policies later on in this representation.

Plan period

14. HBF would suggest that consideration should be given to extending the plan period. The plan needs to run for a minimum of 15 years from the date of adoption and it can take a lot of time for Plans to progress from Reg 18 through to Reg 19, Submission and Examination, Inspector's Report and Adoption. In light of the amount of time it can take to progress through the multiple stages of plan-making, a longer end date for the plan, of 2041, or even 2042, may be a more realistic. Whatever plan period is chosen there is a need for evidence to cover the whole plan period, it would therefore be sensible to ensure the evidence covers a longer time frame as well.

Naming and Numbering of Policies

15. HBF observe that the numbering of the policies within the Plan reads as slightly odd. It would be more normal to refer to the policies as Strategic Policy S1, not Policy Strategic S1.

Section 3 *Development Strategy and Strategic Policies*

Policy Strategic S1 Protecting and Enhancing the Boroughs Green Spaces

16. HBF questions if there is a need for a strategic policy on protecting green space, and if this matter is better addressed as part of the spatial strategy and/or development management policies. The policy as currently written adds nothing to the other policies on this subject in the Plan and does not assist in the determination of a planning application. If it is retained, it will be important for the policy to set out how the approach to protecting open spaces links to mandatory BNG, and in particular if and how BNG units can be provided on open spaces and/or within woodlands.

Policy Strategic S2 Nature conservation

17. HBF questions if there is a need for a strategic policy on nature conservation as this issue is already adequately addressed in the chapter on green and natural environment. The policy as currently written adds nothing to the other policies on this subject in the Plan and does not assist in the determination of a planning application. If it is retained, it will be important for the policy to set out how the approach to nature conservation links to the delivery of mandatory BNG.

Policy Strategic S3 Economic delivery strategy

18. HBF suggest that the Telford and Wrekin Local Plan should be planning for a higher number of houses for a variety of reasons including supporting economic growth. The Plan could do more to recognise the links between housing and employment and the impacts that failing to properly plan for housing will have on the economic performance and competitiveness of wider West Midlands Region.
19. HBF request that a clearer link and explanation is made between the spatial strategy, housing and employment allocations and the topic specific policies later in the Plan. Such matters may need to be considered on an area-by-area basis that fully recognises the links between housing policy and employment policy. Employment allocations and opportunities within a particular area could give rise to an additional housing need that should be accommodated within that area.
20. The failure to provide new housing close to where people work results in longer commuting times, less sustainable patterns of development and harms the economic performance of an area. What is needed is a plan that plans effectively for the housing and employment growth within Telford and Wrekin. Whilst HBF are support of the Council's approach to the need for plan-making and its pro-growth agenda, this should be further supported through a higher housing requirement and additional housing allocations. We would wish to see the strong track record of housing delivery in Telford Wrekin continue not only to 2031, but also to 2040 and beyond.

Policy Strategic S4 Housing delivery strategy

Criterion 1. The housing requirement.

21. The policy states that “The council has 55% of its identified housing requirement of 20,200 homes consented, under construction or already built. The Council is planning to deliver an average of 1,010 dwellings a year through existing supply and land allocations”. It is not clear as it could be from the wording in the Policy, or the supporting text, how this number of 20,200 has been arrived at, and how it relates to the existing Local Plan housing requirement of 17,280 net new dwellings up to 2031. Although the Housing Technical Paper¹ provides an explanation for the approach the Council is taking, HBF suggest this needs to be included more explicitly within the wording of the Plan.
22. On the face of it the Council has extended the Plan period by 9 years but only increased the housing requirement by 2,920 resulting in less than 325 new homes per additional year. HBF therefore suggests that overall housing number may need increasing, especially when the standard method as set out in the technical paper² identified a figure of 475 per annum using the standard method.
23. Para 61 of the newly revised (Dec 2023) NPPF says that “to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area”. Para 67 states that “The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.”
24. HBF strongly support the need for more housing in the Telford and Wrekin Local Plan for a variety of reasons including addressing the current housing crisis, meeting housing need, providing affordable housing, to support small and medium house builders and to support employment growth. HBF would request that the Council considers the proposed housing requirement fully considers all of the issues that may result in a need for a higher housing requirement, including the need to provide a range and choice of sites, the need for flexibility, viability considerations and whether higher levels of open-market housing are required in order to secure increased delivery of affordable housing.

¹ HOUSING REQUIREMENT TECHNICAL PAPER Telford & Wrekin Local Plan 2020 – 2040 DRAFT PLAN CONSULTATION VERSION Prepared by Strategic Planning Research Unit DLP Planning Ltd Bedford, Oct 2023

² *ibid*

25. HBF are also very aware of the challenges facing the Local Planning Authorities in the West Midlands and the Black Country to meet their own housing requirements. The issue of unmet needs has proven problematic with many neighbouring West Midlands authorities all saying they cannot meet their own needs because they are constrained and then asking each other to take their unmet needs, without success. HBF are aware that one of the issues amongst those currently troubling the Shropshire Local Plan Examination in Public is the issue of unmet housing and employment need arising from the Black Country. It will be important for the Council to explicitly consider, set out their position, and if needed address, whether any such issues require consideration through the Telford and Wrekin Local Plan process. Again, although this is referred to in the technical paper³, HBF suggest this needs to be referenced more explicitly within the Plan itself.
26. Although the housing technical⁴ paper includes reference to making a contribution to the Black Country needs, if any such contribution is to be made it should be explicitly set out in the Plan and monitored separately. In light of the scale of unmet need within both Birmingham and the Black Country HBF would suggest the Council could be doing more to help to meet some of this unmet need, and increasing the housing requirements for Telford and Wrekin as a result.
27. HBF would expect Telford and Wrekin's Plan (or Plan review) to be an ambitious plan that plans for the future development of the Borough, detailing where new housing will go, meeting housing needs, providing certainty for the house building industry and setting out a long-term vision for the area, in accordance with the NPPF. Instead, as references in para 3.36 the Council seeks to rely on the Economic and Housing Development Needs Assessment (EHDNA). HBF can see merit in the arguments put forward by the Council that seek to justify a departure from the standard method. Ultimately HBF support the need for a higher housing requirement in the Telford and Wrekin Local Plan.
28. The EHDNA dates from Oct 2020 but has been updated by the 2023 technical paper. The NPPF requires the standard method to be used unless exceptional circumstances justify an alternative approach. HBF note the Council's view that there are exceptional circumstances which would warrant a different approach than the standard method being used for Telford and Wrekin, and we are sympathetic to many of the arguments in support of this approach.
29. However, perhaps what is more important to note is that HBF would support higher housing figures being used than the standard method, as the Council is proposing to do. HBF clearly has no objection to the Council looking to increase the housing requirement above the standard method, for the

³ ibid

⁴ ibid

reasons listed in the technical paper. Many other Councils seeking to depart from the standard method do so to constrain their housing numbers, HBF note and welcome the Council is seeking to depart from the standard method to increase their housing requirements. To some extent therefore HBF concerns are a technicality. It is important to HBF that the final outcome for the Plan is a higher housing number. This must not get lost in technicalities around the standard method.

30. The Government has made it clear that it still supports the national target of 300,000 new homes per year. The standard method housing requirement has always been only the starting point for setting the housing requirement in a Plan.
31. Indeed, HBF would support more housing than the standard method housing requirement in order to support economic growth, provide a range and type of sites and to support small and medium house builders. There is a need to provide a range and choice of sites, a need for flexibility and viability considerations to be taken into account and a need for the Council to consider whether higher levels of open-market housing are required in order to secure the delivery of affordable housing and/or support economic growth.
32. As the housing requirement is a minimum figure, the wording of the policy should refer to the minimum housing requirement (which HBF argue should be higher) rather than inferring that the housing requirement is a figure to be met but not exceeded.

Criteria 2 and 3. Plan, monitor, manage.

33. HBF are however pleased to see the plan, monitor and manage approach to housing delivery has been explicitly recognised in this this plan, and in particular are supportive of the wording of criterion 2 which states “The delivery of new dwellings will be managed and monitored on an annual basis against the housing trajectory”.
34. Although Criterion 2 references the Housing Trajectory and the term housing trajectory is defined in the Glossary for the Plan, no Housing Trajectory has been provided within this Reg 18 Plan. HBF believes a housing trajectory should be an integral part of the Plan, particularly due to its key role in housing monitoring.
35. Criterion 3 of the policy continues “If monitoring indicates that delivery is likely to fall below the level required to maintain an adequate supply of deliverable sites then the Council will proactively seek to increase the delivery of sites through the planning process.”
36. HBF are pleased to see such explicit references to the actions that the LPA can and would take in the case of under-delivery. HBF do not support the

inclusion of policies within a Local Plan that merely triggers a review of the Local Plan if monitoring shows housing delivery is not occurring as expected. Such a policy does nothing to address the housing crisis or undersupply of homes. There are other more effective and immediate measures that could be introduced into policy that would enable the Council to address housing under deliver, much more quickly than would be possible through the production of another plan, or plan review.

37. Although HBF content that the housing requirements figure should itself be higher, we agree that it is important that houses are brought forward, and the matter addressed as soon as possible, if any under-delivery is observed. Although HBF are very supportive of the policy wording in Criterion 3 we would also suggest that the Plan needs to include a Monitoring Framework within it.
38. HBF would wish to see a Monitoring Framework included within the Plan, which clearly sets out the targets for housing (and other matters) that will be monitored and the triggers for action being taken, and what that action will be. Monitoring is essential to see if the Plan is delivery housing as expected. The monitoring framework is part of the way that the Plan delivers the flexibility is needed, so that the Council is able to respond to any changing circumstances.

Criterion 4: Housing Land Supply

39. Although HBF welcome the Council's commitment to housing delivery inferred from the wording of criterion 4, we are concerned that Housing Supply in the Plan remains inadequate and the full range of options to address under-delivery have not been fully explored and utilised.
40. Criterion a) refers to the completion of sites with planning permission, and Table Four indicates that the Plan is seeking to rely on 11,378 dwellings that are commitments, defined as sites with permission not expired, sites with resolution to grant planning approval and remaining Local Plan housing allocations. It will be important for the Reg 19 version of the Plan to be supported by evidence, monitoring and analysis to demonstrate that these sites remain deliverable, and that they can continue to be relied upon.
41. Criterion b) refers to new housing allocations in Policy HO1. HBF's specific comments in relation to HO1 can be found in our response to that policy, but we are surprised that the Council has chosen not to include a list of the housing within the wording of either the Strategic Housing Policy or the housing allocations policy. Doing so would greatly assist the usability of the Plan and assist with the housing monitoring. Relegating the list of new allocated housing sites to Appendix C and the Local Plan map seems to minimise their importance and further indicates that this Plan does not seem to be about guiding new development as plan-making process requires.

42. The NPPF requires Local Plans to identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare, unless there are strong reasons why this cannot be achieved. The HBF has undertaken extensive consultation with its small developer members. One of the chief obstacles for small developers is that funding is extremely difficult to secure without a full, detailed, and implementable planning permission. Securing an implementable planning permission is extremely difficult if small sites are not allocated. Without implementable consents lenders are uneasy about making finance available or the repayment fees and interest rates they set will be very high. Small developers, consequently, need to invest a lot of money and time up-front in the risky business of trying to secure an allocation and a planning permission, and this is money that many small developers do not have.
43. The Council should set out in the Plan's policies and evidence base to set out how the plan will deliver 10% of homes on sites of less than one hectare, as required by paragraph 69 of the NPPF. Indeed, the HBF would advocate that a higher percentage of small sites are allocated if possible. Such sites are important for encouraging the growth in SME housebuilders who will tend to develop these sites but rarely see the benefits that arise from the allocation of sites in a local plan. Up until the 1980s, small developers once accounted for the construction of half of all homes built in this country resulting in greater variety of product, more competition, and faster build-out rates. Since then, the number of small companies has fallen by 80%.
44. HBF have been unable to find within the evidence base any analysis of how the small site requirement will be delivered within this Plan. This information needs to be provided and HBF may wish to comment on it once it has been.
45. HBF also note that support for small and medium builders need not be limited to only small sites of less than 1Ha. SMEs also deliver on other types of non-strategic sites (for example up to 100 units). The inclusion of additional non-strategic allocations would expand the range of choice in the market, and (possibly most importantly), be of a scale that can come forward and making a contribution to housing numbers earlier in the plan period.
46. Although HBF do not comment on specific site allocations, we are of the view, for the reasons details elsewhere in our representation, so not repeated here, there need to be more housing allocations.
47. Criterion c) references that windfalls make up part of the housing supply in this Plan, with para 3.37 stating that an "allowance of 60 dwellings per year on small windfall sites (sites not identified in the Local Plan) is based on past delivery. The overall housing supply includes a flexibility allowance to ensure choice and a buffer against non-delivery".
48. The NPPF (para 72) only permits an allowance for windfall sites if there is compelling evidence that such sites have consistently become available and

will continue to be a reliable source of supply. By including windfalls within the Plan's housing requirement, the opportunity for windfalls to provide some additional housing numbers is removed. Windfalls do not provide the same choice and flexibility in the market as additional allocations.

49. There is no housing trajectory provided as part of this Reg 18 consultation Plan. It is therefore not possible see how much reliance is being made on windfalls, or from when. The Plan should include a Housing Trajectory that includes a breakdown of the housing numbers into different sources of supply.
50. HBF are of the view that any allowance for windfall should not be included until the fourth year of a housing trajectory, given the likelihood that dwellings being completed within the next three years will already be known about (as they are likely to need to have already received planning permission to be completed within that timeframe).
51. HBF are also of the view that any buffer provided by windfall sites should be in addition to the buffer added to the housing need figures derived from the Standard Method to provide choice and competition in the land market. HBF therefore request that any windfall allowance in the Plan is properly explained and evidenced in the Housing Trajectory. We would also wish to comment on the Housing Trajectory.
52. Criterion d) references rural exception sites and housing in rural areas. This does nothing to address the requirement for allocations of 10% as small sites.
53. Criterion e) allows for self-build homes in accordance with policy HO11. Again, this does nothing to meeting the small sites allowance requirements.
54. As the housing need and requirement figures for the Plan are minimum (not maximum) figures the Council could also specifically identify additional and/or reserve sites and/or include policies that would allow for additional windfall housing sites that could/would be brought forward sooner to address any under delivery whatever the reason for that under performance. This could be a shortfall in market housing permissions granted and/or completions, affordable housing permissions granted and/or completions and any failure against the Housing Delivery Test or local plan monitoring.
55. Therefore, HBF suggest, as a minimum, that explicit reference should be made both within the Plan's policy and within the monitoring framework of the potential to bring forward additional housing supply earlier, and the ways in which this could be done.

Policy Strategic S5 Mitigating and adapting to climate change

56. The proposed wording in this policy, particularly at Criterion 4 suggests that the Council is seeking to move away from the carbon reduction methods set out in Part L of the Building Regulations. HBF supports the Council in seeking to minimise carbon emissions and reduce heat and power demand through energy efficient design. However, the HBF does not consider that the Council setting its own standards is the appropriate method to achieve these outcomes.
57. Whilst the ambitious and aspirational aim to achieve zero carbon is lauded, the HBF is concerned that the Council is adding to the complexity of policy, regulations and standards that housebuilders are already expected to comply with. The key to success is standardisation and avoidance of individual Councils specifying their own policy approach, which undermines economies of scale for product manufacturers, suppliers and developers. The impact of this requirement along with others in this Plan may have considerable viability implication and may lead to the non-delivery homes and needs to be fully considered within the Viability Assessment.
58. HBF would caution against policies that seek to go further and faster than national legislation and policy changes, which would lead to the creation of a patchwork of differing local policies which could inadvertently undermine the delivery of the wider environmental objectives the Council is seeking and create unnecessary delays to much needed new housing.
59. HBF would highlight the latest publication 'Future Homes, One Plan Building a generation of high quality, affordable and sustainable homes and communities, together' https://irp.cdn-website.com/bdbb2d99/files/uploaded/Future%20Homes%20One%20Plan_Future%20Homes%20Hub%20Prospectus-%20FINAL%20WEB.pdf. This was published in Nov 2023 and highlights what actions are needed to support the delivery of sustainable homes.
60. In particular, HBF would highlight 'Issue 9. The Partnership Imperative' on page 15 which states in the Local Government section that "Local planning requirements must align with the overall plan for improving performance standards at national level. For example, avoiding divergence of local energy standards that make it harder to accelerate improvement in standards at national level, and avoiding conflict between local planning conditions and new requirements of building regulations."
61. The government has also recently provided further advice for local authorities through the Written Ministerial Statement which says "the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of

scale.” See <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/HCWS123>

62. To be consistent with national policy, HBF request the Council rely on the Building Regulations process as the way to manage improving energy efficiency standards and as such no policy on this issue is needed in the Strategic or non-strategic policies in the Telford and Wrekin Local Plan.

Policy Strategic S6 Healthy stronger communities

63. Again, HBF questions what this over-arching policy adds anything to policies elsewhere in the Plan.

Policy Strategic S7 Developer contributions and infrastructure delivery

64. Development can only be required to mitigate its own impact and cannot be required to address existing deficiencies in infrastructure or services. It is therefore essential for the IDP to clearly show the existing and known deficiencies in the current infrastructure, before reaching any conclusion on the cumulative effects of new development, and any contribution that is needed from new development to mitigate any additional individual and/or cumulative impacts.
65. Whole Plan viability testing is an important part of the plan-making process. However, as noted in PPG (ID: 10-003-20180724) assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable.
66. HBF would therefore request that additional flexibility should be included within this policy. This was needed because whole plan viability assessments use methodologies that test typologies of sites, and not the detailed circumstances of individual sites. As such there may be individual sites that are already not viable, for example if the costs or values of a specific site fall outside the parameters used of a typology that was tested. Some site will be on the very margins of viability and other sites may already be unviable even without a change of circumstances. Therefore, additional flexibility is needed in the policy, and without this flexibility the plan is unsound because it was neither justified nor effective.
67. HBF suggest the policy wording should include the opportunity for negotiation around policy requirements for site specific reasons, as any sites whose circumstances fall outside the parameters of the typologies tested could already be unviable under the proposed Local Plan policies. The current wording of para 3.55 of the Plan is not in accord with the PPG viability guidance⁵ which does allow for site specific viability considerations to be

⁵ <https://www.gov.uk/guidance/viability> Paragraph: 007 Reference ID: 10-007-20190509

taken into account. Overage clauses may not be appropriate in all cases, particularly for single phased developments.

68. HBF have been unable to locate a draft whole plan viability assessment for this Reg 18 Plan. This will be an important part of the evidence base. HBF have provided some detailed comments on Viability which can be found in response to Policy HO4: Affordable Housing and so these are not repeated here. It will be important for the policy to set out how it links to mandatory BNG.

Section 4 *Development management policies*

69. HBF question the format of this section, and whether it should be a stand-alone section. It seems in fact to be an introduction to the development management policies in the Sections 5 to 13.

Section 5 *Green and natural environment*

Policy NE1 Biodiversity and geodiversity

Designated ecological, biodiversity and geological

70. HBF recognise that the new BNG requirements and guidance do not change the existing protections to the designated sites and species. HBF suggest it would be helpful to keep the different elements of green and natural environment policies separate. The wording of this policy is confusing, as muddles very different concepts together in a way that is unhelpful.

Habitats and species

71. Although it will be important for the Plan to set out how the different nature and conservation policies are meant to work together, HBF suggest that the criterion 3 is unnecessary as the Plan must be read as a whole.
72. Criterion 4 of this policy references BNG, which has a separate policy NE3, and Urban Greening which also has a separate policy NE4, it also references Buffer Zones- which are not required in relation to BNG sites or Urban greening, the wording of criterion d, in the context of this policy is confusing. HBF request the Council revisit the wording of this policy and revise it to only cover matter not already covered by other policies within this Chapter or elsewhere in the Plan.

Policy NE2 Trees, hedgerows and woodlands

73. It will be important for the Plan to set out how the different nature and conservation policies are meant to work together, HBF suggest this policy on

trees, hedgerows and woodlands needs to be clearer on how this policy links into mandatory BNG requirements.

Policy NE3 Biodiversity Net gain

74. This policy will need reviewing and revising in light of the new guidance on BNG that has published during the consultation period for this Plan. The Council will need to review this policy to ensure it fully reflects all the new legislation, national policy and guidance.
75. HBF has been involved in a significant amount of work, being led by the Future Homes Hub, on BNG preparedness for some time and note the draft Planning Practice guidance from DLUHC and the Draft DEFRA BNG Guidance has been released during your consultation period.
76. Currently the BNG PPG has been published in draft form to allow for “familiarisation” and as such some details may change between now and the implementation date which is now confirmed as 12th February 2024. Similarly, HBF understand the DEFRA Guidance is still being refined before the implementation date, and indeed may be further refined once mandatory BNG is working in practice, to reflect any early lessons learnt.
77. HBF note that there is a lot of new information for the Council to work through and consider the implications of, in order to ensure that any policy on Biodiversity Net Gain policy so that it complies with the latest policy and guidance as it is finalised. It should also be noted that the PPG is clear that there is no need for individual Local Plans to repeat national BNG guidance.
78. It is the HBF’s opinion that the Council should not deviate from the Government’s requirement for 10% biodiversity net gain as set out in the Environment Act. The Plan should provide certainty for developers and a clear BNG policy with a fixed 10% figure, rather than the policy including the phrase “at least 10%” would help to provide this.
79. There are significant additional costs associated with biodiversity gain, which will need to be fully accounted for in the Council’s viability assessment. It is important that BNG does not prevent, delay or reduce housing delivery. Although the national policies requiring 10% BNG cannot be subject to site specific viability discussions, any policy requirements over 10% can be. Any policy seeking more than 10% BNG needs to reflect this position.
80. It is also important to note that for large and complex sites where the development is phased, the guidance is clear that the 10% must be delivered at the end of the development, and this may not result in 10% BNG on each phase. Additional advice on phased development is still awaited.
81. HBF also suggest particular care is needed in terminology to ensure the BNG policy reflects the national policy and guidance. For example, on-site and off-site biodiversity is referred to as units, and the statutory national credit system of last resort is referred to as credit. Similarly, it will be important to

differentiate between the mitigation hierarchy, which seeks to avoid harm and then mitigate it in relation to protected habitats and the BNG hierarchy which prioritises on-site BNG delivery, then off-site units and finally allows for statutory credits. National BNG policy allows for all three of these options, and therefore the Plan should also reference statutory credits.

82. The costs of BNG must also be considered as part of the whole plan viability assessment and should be specified as a single specific item, not combined into a generic s106 costs item. There are significant additional costs associated with biodiversity net gain, which should be fully accounted for in the Council's viability assessment, some of which are unknown at this time. It is important that BNG does not prevent, delay or reduce housing delivery.
83. As this is an emerging policy area and the market for off-site provision, and statutory credits are not yet known, any figure used for BNG costs will need to be kept under review as BNG implementation progresses and a greater understanding of actual costs become available. The Whole Plan Viability Assessment should clearly set out how it considered the implications of mandatory BNG and how it was arrived at using the most up to date BNG costs information available.
84. HBF suggest that there will also be a need for this policy and supporting text to say more about Local Nature Recovery Strategies. As the LNRS emerges it will be important for this Local Plan to be kept under review and further public consultation on the interaction between the two documents and/or changes to Local Plan policy to reflect the LNRS may be needed.
85. HBF would also encourage the Council to ensure the Local Plan fully considers the new BNG requirements in relation to site allocations. This is likely to require undertaking an assessment of the baseline to support the allocation to enable an understanding the BNG requirements for a site to be allocated and the impact this may have on viability and other policy requirements and considerations. It will be important to understand the BNG costs of mandatory BNG as this is non-negotiable and as such may impact on the viability of the site and its ability to deliver against other policy requirements such as affordable housing or other s106 asks.
86. HBF also notes that there seems to be significant potential for confusion around environmental hierarchy, and suggest particular care is needed to avoid any confusion between the well-established mitigation hierarchy and the new BNG hierarchy. There is need for the policy wording and/or supporting text to be clearer about the differentiation between the mitigation hierarchy (which seeks to avoid harm in the first place, then mitigate and only then compensate it in relation to protected habitats) and the BNG hierarchy (which prioritises on-site BNG delivery, then off-site units and finally allows for statutory credits). There seems to be significant potential for confusion between the two difference hierarchies. HBF therefore suggest that the Reg 19 Plan should do all it can to explain how the two hierarchies work in different ways and that they seek to achieve different aims. We would suggest the use of the term "BNG spatial hierarchy" may help with this issue.

87. Reference could also usefully be made within the Plan to the small sites metric. This is intended to be a less complex statutory metric that can be used to set out how 10% BNG will be secured on small sites. It can only be used for on-site BNG delivery. The national mandatory 10% BNG policy will apply to small sites from April 2024.
88. The new DEFRA and DHLUC guidance is clear that going beyond the mandatory 10% requires evidence and there is a need to show that this will not impact viability. No such evidence exists to support a higher figure in Telford and Wrekin.

Policy NE4 Greening factor

89. Criterion 1 of the policy states that “The council will require all major development proposals to contribute towards the greening of the borough through the integration of multifunctional green and blue infrastructure within a development’s site design.”
90. Criterion 2 requires “All major residential development proposals, or proposals that are predominately residentially led, should meet a minimum Greening Factor of 0.4” and Criterion 3 requires “all major non-residential development, or proposals that are predominately non-residentially led, should aim to meet a Greening Factor of 0.3.”
91. Criterion 4 of the policy states that “where the Greening Factor cannot be met on site, then the council will work with applicants to identify offsite opportunities to enhance local green infrastructure. This would be secured by planning conditions and/or obligations and delivered in line with locally identified needs.”
92. HBF note that Urban Greening is likely to be a new concept for many. Although the supporting text of the policy attempts to explain what the Urban Greening Factor is, what is unclear from the policy is how the level of Urban Greening that would be required through the use of the Urban Greening Factor relates to the 10% Biodiversity Net Gain (BNG) required by the Environment Act.
93. There would appear to be the potential for significant overlap with BNG that will need to be explored to ensure that the Council is not creating unnecessary administrative burdens on all applicants. Also, without a whole plan viability is also currently impossible to know how this might impact on the viability of development.
94. HBF suggest that if the Council were to take forward the use of the Urban Greening Factor, it should not be a requirement on all sites. For example, smaller sites or sites near existing open spaces might be encouraged but not required to use the urban greening factor to inform the design. It would also seem inappropriate to require its use where specific provision has been

agreed as part of a site allocation. The Plan will also need to clearly set out UGF relates to the wider BNG and LNRS objectives.

Policy NE5 Green network

95. Again, this policy needs to be clearer on how it links into BNG, particularly whether off-site BNG can be provided through enhancements to existing Green Networks.

Policy NE7 Strategic green gaps

96. HBF are of the view, for the reasons detailed elsewhere in our representation, and so not repeated here, that the Council need to allocate more sites for housing, including possibly some within Strategic Gaps.

Section 7 Housing

Policy HO1 Housing development principles

97. As mentioned in our response to Policy Strategic 4, HBF are surprised that the Council has chosen not to include a list of the housing allocations within the wording of either the Strategic Housing Policy or this housing allocations policy. Doing so would greatly assist the usability of the Plan and assist with the housing monitoring. Relegating the list of new allocated housing sites to Appendix C and the Local Plan map seems to minimise their importance and further indicates that this Plan does not seem to be about guiding new development as plan-making process requires.
98. HBF have made comments on the policies in climate change, energy efficiency and low carbon energy in the relevant policy section of this representation. They are not repeated here.

Policy HO2 Sustainable Urban Extension Sites

99. Although HBF do not comment on individual allocations, including the three potential Sustainable Urban Extensions (SUE) sites, we would offer some general comments on the reliance of SUEs to deliver housing in the Telford and Wrekin Local Plan.
100. SUEs can take time to bring forward. HBF welcomes the Council's ongoing engagement with SUE promoters, as this will be essential in ensuring their delivery. Similarly a clear plan-making framework is essential to give confidence to the development industry around new SUEs locations. HBF strongly supports the Council in their endeavours to provide this certainty.
101. As set out in policy HO2, there is a need for such sites to be brought forward in a planned way and this takes time. It will therefore be important for the Plan to make a clear decision on the preferred site or sites for the SUEs as soon as possible to enable them to be progressed, especially when the

SUE(S) are expected to make a contribution to the housing supply over the plan period.

102. As noted elsewhere in our representation, HBF would be supportive of a higher housing requirement for the Telford and Wrekin Local Plan (Review) and this would necessitate additional housing allocations. The council is seeking views on which SUE(s) is/are preferred. HBF suggest the sale of housing need is such that the Council should not be relying on only one of the SUEs. They may all have a role to play. Further clarity is needed on how SUEs will be assessed and allocated. It is important that the housing needs of Telford and Wrekin are met in full. HBF support the role SUEs can make in meeting this need both within the plan period and beyond.
103. In relation to the policy wording of HO2 itself HBF observe that in criterion 2b) the policy also references the Council's Homes for All Supplementary Planning Document (SPD). In doing so the Council is seeking to give Local Plan policy status to SPD which is contrary to national guidance. Planning policy must be made through the Local Plan process. This is subject to mandatory requirements for public consultation and independent scrutiny through the Examination process. Seeking to give Local Plan status to the existing SPDs is not appropriate. Any reference to the SPD should be moved to the supporting text.
104. Criterion 2d) require 5% of plots to be for self-build or custom-build. HBF does not consider that requiring major developments to provide for self-builders is appropriate. Instead, the HBF advocates for self and custom-build policies that encourage self and custom-build development by setting out where it will be supported in principle. The HBF considers that Councils can play a key role in facilitating the provision of land as set in the PPG. This could be done, for example, by using the Councils' own land for such purposes and/or allocating sites specifically for self and custom-build home builders- although this would need to be done through discussion and negotiation with landowners.
105. It is considered unlikely 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. HBF also question if there is a mismatch between the kind of plots and locations that self-builders are looking for, and the kind of plots that would result from this policy.
106. It is the HBF's opinion that 5% self-build plots should not be required on SUEs. However, if the policy remains, it needs to be clear what happens where plots are not sold. The Council's policy approach should be realistic to ensure that where self and custom build plots are provided, they are delivered and do not remain unsold. If demand for plots is not realised, there is a risk of plots remaining permanently vacant effectively removing these undeveloped

plots from the Council's HLS. The Council should also consider the application of a non-implementation rate to its HLS calculations.

107. It is important that plots should not be left empty to the detriment of neighbouring properties or the whole development. The timescale for reversion of these plots to the original housebuilder should be as short as possible from the commencement of development because the consequential delay in developing those plots presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site. There are even greater logistical problems created if the original housebuilder has completed the development and is forced to return to site to build out plots which have not been sold to self and custom builders. Any self-build policy would therefore need to make it clear that unsold plots remaining after a certain period would revert back to the original developer. HBF suggest this should be a maximum of six months.
108. Criterion 2k) seeks "in excess of 10% BNG". HBF comments on BNG policies can be found elsewhere in this representation and not repeated here. However, we would note that a policy seeking "in excess of 10%" is imprecise, and a specific figure is needed. HBF do not support the Council going beyond the 10% mandatory BNG, for reasons listed elsewhere in this representation.
109. Criterion 2. l. seeks "urban greening" measures. These are already required in policies NE1, NE4 and HBF would question if there is any need for a third reference to this policy concept, when the plan needs to be read as a whole.
110. Criterion 2. p. seeks to require SUEs to "exceed the Building Regulations on carbon emissions and energy efficient buildings." HBF comments on carbon emissions and energy efficient buildings policies can be found elsewhere in this representation and not repeated here.
111. Criterion 2.q. seeks "on site renewable energy generation at property, street and site level in order to minimise draw on the electricity grid." HBF's comments on renewable energy generation policies can be found in that section and are therefore not repeated here.
112. Criterion 3 states that "The SUE needs to be delivered to the agreed masterplan and deliver a range of uses. Details should be submitted with applications to clearly demonstrate the stewardship arrangements for the site including how and when any land would be transferred." HBF are unclear what is meant and required by this policy, and why transferring land needs to be specifically referred in this policy. Surely this should be a matter for the Masterplan.

Policy HO3 Housing mix and quality

113. Criterion 2 requires all development to meet Nationally Described Space Standards. HBF does not support the introduction of the optional Nationally Described Space Standard through policies in individual Local Plans. If the Council wanted to do this they would need robust justifiable evidence to introduce the NDSS, as any policy which seeks to apply the optional nationally described space standards (NDSS) to all dwellings should only be done in accordance with the NPPF which states that “policies may also make use of the NDSS where the need for an internal space standard can be justified”.
114. The NPPF requires that 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. The PPG identifies the type of evidence required to introduce such a policy. It states that ‘where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:
- Need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.
 - Viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.
 - Timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions’.
115. HBF also remind the Council that there is a direct relationship between unit size, cost per square metre (sqm), selling price per sqm and affordability. The Council’s policy approach should recognise that customers have different budgets and aspirations. An inflexible policy approach to NDSS for all new dwellings will impact on affordability and effect customer choice. Well-designed dwellings below NDSS can provided a good, functional home. Smaller dwellings play a valuable role in meeting specific needs for both open market and affordable home ownership housing.
116. An inflexible policy approach imposing NDSS on all housing removes the most affordable homes and denies lower income households from being able to afford homeownership. The introduction of the NDSS for all dwellings may mean customers purchasing larger homes in floorspace but with

bedrooms less suited to their housing needs with the unintended consequences of potentially increasing overcrowding and reducing the quality of their living environment. The Council should focus on good design and usable space to ensure that dwellings are fit for purpose rather than focusing on NDSS.

117. HBF considers that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional.
118. If the proposed requirement for NDSS is carried forward, then the Council should put forward proposals for transitional arrangements. The land deals underpinning residential sites may have been secured prior to any proposed introduction of the NDSS. These sites should be allowed to move through the planning system before any proposed policy requirements are enforced. The NDSS should not be applied to any reserved matters applications or any outline or detailed approval prior to a specified date.
119. Criterion 5 again seeks to give Local Plan status to the Council's existing Homes for All Supplementary Planning Document (SPD). This is not appropriate. In doing so the Council is seeking to give Local Plan policy status to SPD which is contrary to national guidance. Planning policy must be made through the Local Plan process. This is subject to mandatory requirements for public consultation and independent scrutiny through the Examination process. Seeking to give Local Plan status to the existing SPDs is not appropriate. Any reference to the SPD should be move to the supporting text.
120. Criterion 6 requires all major development to include M4(2) and M4(3) housing standards. HBF note that the requirements to meet Part M4(2) will be superseded by changes to residential Building Regulations. The Government response to 'Raising accessibility standards for new homes' states that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations. There is therefore no need for this element of the proposed new policy.
121. HBF also notes that the PPG states:

"What accessibility standards can local planning authorities require from new development?"

Where a local planning authority adopts a policy to provide enhanced accessibility or adaptability they should do so only by reference to Requirement M4(2) and/or M4(3) of the optional requirements in the Building

Regulations and should not impose any additional information requirements (for instance provision of furnished layouts) or seek to determine compliance with these requirements, which is the role of the Building Control Body. They should clearly state in their Local Plan what proportion of new dwellings should comply with the requirements. There may be rare instances where an individual's needs are not met by the wheelchair accessible optional requirement.

122. Local Plan policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable. Where step-free access is not viable, neither of the Optional Requirements in Part M should be applied.”
123. The PPG sets out some of the circumstances where it would be unreasonable to require M4(2) and M4(3) compliant dwellings. Such factors include flooding, typography and other circumstances. HBF suggest that flexibility is needed in the application of these standards to reflect site specific characteristics, and the policy wording should reflect this.
124. There is also a need to differentiate between Part a) and part b) of M4(3) technical standards. M43a sets out standards for wheelchair adaptable housing, where M43b relates to wheelchair accessible housing which can only be required on affordable housing where the Council has nomination rights. This part of the policy needs to be amended to recognise this distinction. The viability Assessment should also consider the cost implications resulting from any requirements for the provision of M43a and/or M43b requirements. HBF therefore request that the policy is amended so that it is applied flexibly. This issue should also be factored into the whole plan viability assessment as both M4(3)a and M4(3)b impact on viability, with M4(3)b being considerably more expensive.

Policy HO4 Affordable housing requirements

125. The policy seeks 25% affordable homes in the Telford built-up area and 35% affordable homes in Newport and the rural area. HBF have been unable to locate a current whole plan viability appraisal that supports this policy percentage.

Policy HO5 Affordable housing delivery

126. HBF note that there is a conflict between policy HO5 and HO4. Criterion 4 of Policy HO4 recognises the role that First Homes can play as part of the Affordable Housing calculations, but criterion 2.e. of Policy HO5 for which require on-site affordable housing to be transferred to an RSL to be

provided would not apply to First Homes, which are sold directly to their future occupiers.

127. The layout of this policy is also very confusing. It seems to be clear that sub-criteria a. b. and c. relate to criterion 1, and sub criterion e. f. and g. relate to criterion 2, but it is not clear how h. and i. relate to criterion 3. It is unclear if h. and i. are 'exceptional circumstances' referred to in criterion 3, if so, are they the only ones? Clarity is needed on this point.

128. In relation to criterion i. HBF note that overage clauses may not be appropriate in all cases particular single phased developments para 7.37 does not reflect the diversity, and emergence on new models of housing for older people, within both the market housing and affordable housing sectors.

Policy HO6 Supported and specialist housing

129. The viability of the development of older persons housing (including extra care schemes) is different for a number of reasons including:

- Less efficient net to gross ratios than general purpose housing.
- The inclusion of extensive communal areas, providing care and other ancillary uses.
- Different net to gross ratios, typically of 70% compared with 85% for low rise general purpose flatted blocks.
- Specialist housing developments for older people tend to have longer sales periods, as purchasers prefer to view the flat they intend to buy which results in very little off-plan buying during construction.
- Sales and marketing budgets are typically higher as a result of the lengthier sales period.

130. The policy needs to reflect this. HBF would expect the whole plan viability to consider the viability of older person's housing as a separate and specific scenario.

Policy HO10 Stalled development sites

131. HBF welcome the Council's intention to be proactive in their efforts to bring stalled sites forward, however this should not be limited only to delayed vacant or derelict brownfield land. Pro-active support and interventions may also be needed to help bring forward allocations and possibly even windfall sites.

Policy HO11 Self-Build and custom housebuilding

132. HBF have provided detailed comments in relation to the 5% requirements for self-build plots in our response to Policy HO2 Sustainable

Urban Extension Sites. They are not repeated here, other than to underline that HBF do not support the requirement for self-build plots on larger allocations, for the reasons listed elsewhere in this representation.

Policy HO12 Housing development in the rural area

133. The wording and layout of this policy is confusing. It covers a range of rural housing issues and as such HBF suggest as a minimum some sub-heading should be included to split out the New Housing in Rural Areas, Infill Development, Replacement Dwellings, Conversions and Change of Use.
134. HBF are unclear what the Council mean in criterion 1.a. when they say rural housing will be supported by directing it to sites with unimplemented permissions. This does nothing to provide certainty, contribute to the small sites requirement, or support SME builders.
135. In relation to criterion 1.c. HBF are again surprised that the policy says allocations will be made in some villages without listing either the villages or the allocations. The wording seems to refer to a subsequent list, but then no list of key settlement is provided.
136. HBF do not believe it is appropriate to refer to a separate document the Rural settlement Paper for the definition of the existing settlements. This should be included within the Plan itself and they should be listed at 1.d. Table 7 then randomly appears within the policy box without any explanation. This needs clarification, perhaps through a title for table 7.

Section 8 *Climate change*

Policy CC1 Sustainable construction and carbon reduction

137. The proposed wording suggests that the Council is seeking to move away from the carbon reduction methods set out in Part L of the Building Regulations. HBF supports the Council in seeking to minimise carbon emissions and reduce heat and power demand through energy efficient design. However, the HBF does not consider that the Council setting its own standards is the appropriate method to achieve these outcomes.
138. Whilst the ambitious and aspirational aim to achieve zero carbon is lauded, the HBF is concerned that the Council is adding to the complexity of policy, regulations and standards that housebuilders are already expected to comply with. The key to success is standardisation and avoidance of individual Councils specifying their own policy approach, which undermines economies of scale for product manufacturers, suppliers and developers. The impact of this requirement along with others in this Plan may have considerable viability implications and may lead to the non-delivery of homes and needs to be fully considered within the Viability Assessment.

139. HBF would caution against policies that seek to go further and faster than national legislation and policy changes, which would lead to the creation of a patchwork of differing local policies which could inadvertently undermine the delivery of the wider environmental objectives the Council is seeking and create unnecessary delays to much needed new housing.
140. HBF would highlight the latest publication 'Future Homes, One Plan Building a generation of high quality, affordable and sustainable homes and communities, together' https://irp.cdn-website.com/bdbb2d99/files/uploaded/Future%20Homes%20One%20Plan_Future%20Homes%20Hub%20Prospectus-%20FINAL%20WEB.pdf. This was published in Nov 2023 and highlights what actions are needed to support the delivery of sustainable homes.
141. In particular HBF, would highlight 'Issue 9. The Partnership Imperative' on page 15 which states in the Local Government section that "Local planning requirements must align with the overall plan for improving performance standards at national level. For example, avoiding divergence of local energy standards that make it harder to accelerate improvement in standards at national level, and avoiding conflict between local planning conditions and new requirements of building regulations."
142. The government has also recently provided further advice for local authorities through the Written Ministerial Statement which says "the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale." See <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/HCWS123>
143. To be consistent with national policy, HBF request the Council rely on the Building Regulations process as the way to manage improving energy efficiency standards and as such no policy on this issue is needed in the Local Plan.

Policy CC2 Renewable energy in developments

144. HBF is concerned about mandatory requirements to connect to district heating networks. HBF considers that it is important that this is not seen as a requirement and is instead implemented on a flexible basis. Heat networks are one aspect of the path towards decarbonising heat, however, currently the predominant technology for district-sized communal heating networks is gas combined heat and power (CHP) plants. Over 90% of district networks are gas fired. As 2050 approaches, meeting the Government's climate target of reducing greenhouse gas emissions to net zero will require a transition from gas-fired networks to renewable or low carbon alternatives such as large heat pumps, hydrogen or waste-heat recovery but at the moment one of the major reasons why heat network projects do not install such technologies is

because of the up-front capital cost. The Council should be aware that for the foreseeable future it will remain uneconomic for most heat networks to install low-carbon technologies. This may mean that it is more sustainable and more appropriate for developments to utilise other forms of energy provision, and this may need to be considered.

145. Government consultation on Heat Network Zoning also identifies exemptions to proposals for requirements for connections to a heat network these include where a connection may lead to sub-optimal outcomes, or distance from the network connection points and impacts on consumers bills and affordability.
146. Furthermore, some heat network consumers do not have comparable levels of satisfaction as consumers on gas and electricity networks, and they pay a higher price. Currently, there are no sector specific protections for heat network consumers, unlike for people on other utilities such as gas, electricity or water. A consumer living in a building serviced by a heat network does not have the same opportunities to switch supplier as they would for most gas and electricity supplies.
147. The Council's proposed policy approach is unnecessary seeks to go beyond the 2021 Part L Interim Uplift and the Future Homes Standard without justification. It is the Government's intention to set standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of individual Council's specifying their own policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers.
148. The Council should be aware that the long awaited consultation on the Future Homes standard was published on Dec 13th 2023 and consultation closes in 6 March 2024. The consultation documents can be found online at <https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation>
149. HBF is also concerned about any policies which mandate on-site renewable energy generation, as this may not be appropriate in all cases,

Policy CC4 Water re-use, conservation, efficiency and quality

150. The policy seeks to require development to ensure an estimated water consumption of no more than 110 litres/person/day. HBF do not believe such a policy is needed in the Local Plan because current Part G Building Regulations require 125 litres per day, and house builders are frequently delivering 115-110 litres per day which means the house building industry is already improving upon the regulations. There is no need for Local Plan policies to repeat Building Regulations and it is in fact unhelpful to do so as Building Regulations may change during the course of the plan period.

Future Engagement

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

A handwritten signature in blue ink that reads "R. H. Danemann". The signature is written in a cursive style with a light blue background behind it.

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