

Sent by email to: planningpolicy@peterborough.gov.uk

 xx/xx2023

Dear Sir/ Madam

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

*Question 3: Housing need*

*3a) This new Plan must have an end date of at least 2041. We think that 2044 is about right. What do you think?*

1. The HBF would agree with the timescale of at least 15 years from the point of adoption. Given the expectation that the plan is to be adopted in 2026/27 this period allows for any potential slippage in plan preparation.

*3b) Government policy says our minimum housing target should be around 19,860 new homes to 2044. To attempt to go lower would highly likely breach national policy, but we could go higher. Should we go higher? If, so why?*

1. The HBF would agree with the Council’s statement that a housing requirement which is lower than that arrived at using the standard method would be a breach of national policy and as such make the plan unsound. However, the HBF does consider there to be clear justification for setting a housing requirment that is higher than the minimum arrived at using the standard method. Firstly, the Council has a significant need for affordable housing that is not being addressed. The adopted local plan states at 6.3.6 that the need for affordable housing in Peterborough is 559 dpa – around 57% of the housing requirement, however, the evidence supporting that plan showed that new development can only viably deliver 30% of homes on site as affordable units. Therefore, even if the Council where to achieve this on all applicable sites there would still be a significant shortfall when considered against the number of affordable homes needed. Planning Practice Guidance (PPG) states at paragraph 2a-024 that “*an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes*”. Whilst an increase in the housing numbers is unlikely to deliver the required number of homes it would certainly ensure more of those needs are met and improve the delivery of affordable housing across the city.
2. Another key reason to potentially push beyond minimum housing need is the ambitious plan for economic growth put forward by the Cambridgeshire and Peterborough Combined Authority and the expectation set out in its Economic Strategy to double the Gross Value Added of its economy by 2040. Within this wider economy the Greater Peterborough is recognised as one of the fastest growing cities in the UK, firms sitting within the top 15 cities in the UK for business start-ups and patents. Recent inward investment, such as the recent completion of the Peterborough campus for Anglia Ruskin University, will continue to drive this growth forward and it will be important, and in line with paragraph 82 of the NPPF, that the ambitious growth expectations set by the combined authority are not constrained by the number of homes being delivered.
3. The Council will also need to consider whether investment in infrastructure will result in a higher level of housing need in the future. The Government have signalled its support for the region in funding the Oxford Cambridge Partnership, which seeks to take forward the ambitions set out for the Oxfordshire Cambridgeshire Arc. This on going support for the region, alongside improvements in east west rail between Oxford and Cambridge, may deliver wider benefits to economic growth across the whole Cambridge/ Peterborough combined area that should be considered, and if a positive impact is found, taken into account by the Council in this local plan.

*Question 6: Settlement Boundaries*

*6a) Should the new Local Plan continue to include settlement boundaries?*

1. The main concern HBF would have with the continued use of settlement boundaries is if these are drawn tightly to the edge of a settlement without any consideration as to whether there are opportunities for that settlement to grow. Too often boundaries are seen as a way of limiting growth, and in particular the delivery of small edge of settlement sites, rather than a means of defining where development can take place. Therefore, if the plan identifies a range of development opportunities across all settlements, then the HBF would not object to their use. In addition, we would suggest that a policy that allows in some circumstances for residential windfall development in the countryside on the edge of settlements or close by. One example of such a policy is HOU5 the Ashford Local Plan, reproduced in Appendix A. The HBF consider that it would be appropriate to include a similar policy in the Peterborough Local Plan to provide a mechanism through which appropriate development in smaller settlements could come forward.

*6b) If the new Plan includes settlement boundaries, how should we go about reviewing the boundaries? You may even want to suggest changes.*

1. In reviewing boundaries, the Council should consider whether development opportunities may be appropriate in future, such as areas of land that are largely enclosed by the settlement where development would lead to a strong and logical boundary to that settlement. Similarly features such as roads, water courses and tree lines can create strong boundaries to settlements whilst also offering logical locations within which new development can come forward.

*Question 7: Growth Options*

1. The Council have identified five broad options for delivering growth. Whilst the HBF does not have a preference as to where development needs are met, we are concerned that the spatial strategies being proposed in many local plans are becoming more reliant on new settlements or large strategic urban extensions as a way of meeting housing needs in full. Such allocations are important and the HBF support their allocation as a means of ensuring long term needs. However, the allocation of these strategic sites is often made to the exclusion of smaller sites and can lead to, as is the case in the adopted Peterborough Local Plan, the need for stepped trajectory to ensure a five-year land supply in the early years of the local plan. The aim of any local plan should be to ensure a consistent supply of homes across the plan period and avoid the need for a stepped trajectory and given the existing supply from allocated sits in the adopted local plan we would expect this to be the case in Peterborough.
2. However, given that the latest housing monitoring report published in September 2022 notes that urban extensions will contribute towards a high proportion of growth in the borough up to 2036 it will be important to have a strong focus on smaller sites in this local plan review. The Council’s monitoring indicates that there is likely to be some 15,000 homes coming forward on sites with outstanding planning permission and on existing allocations over the new plan period. With over 10,000 of these being on urban extensions. This will leave in excess 4,700 homes to be identified in this local plan on other sites.
3. We would urge the Council to have a strong focus on the allocation of smaller sites as suggested in option 5. The benefits of such sites in terms of delivery are outlined in option 5 however the HBF would suggest that the benefits of allocating more small sites goes beyond just the speed at which they deliver new homes. The Council should also recognise that allocating small sites and supporting SME house improves the level of choice within local housing markets, supports 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.
4. The allocation of small sites is also a priority for the Government with paragraph 68 of the NPPF stating that LPAs should identify through the development plan or brownfield register land to accommodate at least 10% of the housing requirment on small sites. this policy stems from the Government’s desire to support small house builders by ensuring that they benefit from the having their sites identified for development either through the local plan or brownfield register. The effect of an allocation is to take some of the risk out of that development and provide greater certainty that those sites come forward. This in turn will allow the SME sector to grow, deliver homes that will increase the diversity of the new homes that are available as well as bring those homes forward earlier in the plan period.
5. A failure to allocate small sites will contributing to the 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 there 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 there scheme will be permitted allowing them to secure the necessary finance that is often unavailable to SMEs until permission is granted.
6. The HBF would therefore encourage the Council to ensure that the spatial strategy taken forward a delivers substantial proportion of new development on smaller allocated sites. As a minimum this should ensure that at least 10% of the requirment – around 1,900 homes – come forward on sites of one hectare or less but we would encourage the Council to go well beyond this figure into order to better support the SME house building sector in Peterborough and Cambridgeshire area.

*Question 8: Urban Extensions Policy*

*8a) Do you agree or disagree with the need for an Urban Extension policy?*

1. The decision as to whether the urban extension policy should be retained will depend on whether this has been effective in bringing forward quality development in a timely and consistent manner. Given that there are still urban extensions to be brought forward, some form of policy will still be required to provide a framework for decision making. This could either be through a general policy as in the adopted local plan or through site specific policies that provide more tailored requirements to the issues facing those urban extensions yet to come forward.

*8b) If yes, what changes and or updates could be made to the policy to ensure sustainable development?*

1. We would not suggest any particular changes to the policy which provides a relatively broad framework to secure the sustainable delivery of urban extensions.

*Question 9: Climate Change*

*9) Should the Local Plan include a policy setting out overarching climate change principles that development should seek to achieve? If so, what should this policy cover?*

1. Many local plans now contain an overarching climate change policy that seek to set out the broad objectives of the Council with more detailed polices setting out the expectations from development. Whilst the HBF does not object to the inclusion of such policies they can often lead to repetition between the overarching policy and other detailed policies. The Council will therefore need to be careful how it is drafted. What these policies, or indeed more detailed policies, should not do is seek to require technical standards over and above what is required through building regulations, a point we return to in later questions. The focus of any overarching policy should be on ensuring development is located in a way that seeks to reduce CO2emissions and that the impacts of climate change are mitigated through the design and layout of a development.

*Question 11: Health and Wellbeing*

*11a) Should the Local Plan continue to require HIA for large scale residential developments? If so, do you agree with the current trigger for HIA of 500 dwellings or more? If no, what should the trigger be and why? For proposals less than 500 dwellings, should HIA continue to be optional?*

1. No. The HBF does not consider it to be justified to request Health Impact Assessments (HIA) on all residential development proposals of 500 or more dwellings. Where such sites are allocated then the health impacts of such a development will have been considered through the preparation of the local plan and the health impact assessment that should be undertaken by the Council. This whole plan assessment will ensure that the plan and the policies it contains will address any negative health outcomes that may arise from the development being proposed and as such not require further assessment when applying for planning permission. The only circumstance an HIA is appropriate is on larger developments that have not been allocated in the local plan and as such not been taken into account in the HIA of the local plan.

*11b) Should the new health and wellbeing policy go further and require the provision of food growing spaces, rather than encourage, within all major developments?*

1. No, the HBF does not support a policy that requires the provision of food growing spaces. If the Council were to require such an approach, they will need to provide robust evidence that there is demand for food growing spaces and insufficient capacity on allotments across the borough to meet any increase in demand as a result of new development.

*11c) Should the new health and wellbeing policy require new developments to incorporate Sport England’s Active Design Principles?*

1. If the Council are to include a reference to these principles it should be included in the supporting text to any policy on health and wellbeing as good practice and not policy.

*Question 13: Energy Efficiency*

*13a) Do you think that the new Local Plan should require higher energy performance standards than required by the building regulations for residential development, up to Level 4 of the Code for Sustainable Homes?*

1. No. As the Council note current Government policy is established in paragraph 6-012 of PPG. This paragraph sets out that Council’s should not go beyond a 20% improvement on the 2013 building regulations (an improvement equivalent to the long-abolished level 4 of the Code for Sustainable Homes). Given that this has now been exceeded by the current Part L Building Regulations introduced in 2021 it would appear that the Government’s intention is to use building regulations as the main focus for change on this matter and there is no need for higher standards to be set in the Peterborough Local Plan.
2. It is also important to note the significant improvements in energy efficiency that have been delivered by the housebuilding industry in recent years. Research by the HBF has identified that 85% of new build properties are rated A or B for energy performance compared to just 4% of existing homes. This means they require much less energy for day to day running, using approximately 9,400 kWh a year compared to older properties averaging over 21,000 kWh per year. This improvement can also be seen when size is taken into account with the average new build using 105kWh per m2 per year compared to 246 kWh per m2 in an existing property. New homes are already making a significant contribution towards meeting the national carbon reduction targets by allowing more people to live in more energy efficient homes.
3. This situation will only improve with the proposed changes to the Building Regulations. New homes are already being built to higher energy efficiency standards set out in the 2021 Building Regulations which will deliver a 30% improvement on previous regulations, with further improvements expected from 2025 with the introduction of the Future Homes Standard. The Future Homes Standard will mean that all new homes built as a result of this plan will be zero carbon ready. These improved technical standard means that the Local Plans approach to climate change should not focus on technical standards for energy efficiency as these are being addressed through building regulations. This approach is not just one supported by the HBF and its members. its development being supported by energy and water providers, bodies such as RSPB and three Government departments. The framework developed will ensure that the transition to zero carbon homes is feasible whilst maintaining house building levels that can address the current housing crisis facing the country. To then place additional requirements with regard to such matters is unnecessary and unjustified.

*13c) Should the Local Plan require developers to submit energy statements to demonstrate how energy requirements have been considered?*

1. No. Developments are required to be built to the energy efficiency standards set out in Building Regulations and as such no further statement should be required.

*Question 14: Embodied Carbon*

*14) How can the Local Plan encourage applicants to use materials that have less embodied carbon?*

1. HBF consider this to be an issue that can only be effectively addressed through Government intervention to provide a clear standard as to measuring embodied carbon. Work by the Future Homes Hub[[1]](#footnote-1) found that it was difficult to draw conclusion about current levels of emissions for different archetypes and what benchmarks might be and the best options for reducing whole life carbon with regard to the use of materials.
2. Given that there is still uncertainty as to the most effective approach to measuring whole life carbon emissions it is difficult for the council and house builder to know whether one approach is significantly better than another. What the study did find was that the greatest saving in terms of whole life carbon was the move from gas boilers to Air Source Heat Pumps which will be required from 2025 as part of Future Homes Standard[[2]](#footnote-2).
3. Given the uncertainty at present regarding appropriate standards the HBF consider the most effective approach will be one driven by central Government. Indeed, this approach is one that we support through our involvement with the Future Homes Hub and the through the implementation plan that will deliver the right tools and capacity across both the house building industry and its supply networks to reduce embodied carbon across all developments. As such we would suggest that until a set standard is obtained the Council should encourage the use of materials with low embedded carbon within any policy.

*Question 15: Adapting to a Changing Climate – Design of Buildings and Spaces*

*15a) Should the Local Plan set out design criteria to reduce the risk of overheating? Should applicants be required to demonstrate how the design of their development proposal minimises the impacts of overheating in the built environment?*

1. The Council recognise that this policy should not duplicate the relevant building regulations relating to overheating and ventilation and we would suggest that further detailed guidance on the design of buildings in relation to this issue is not necessary. However, it will be important that any policy on design recognises the need for development to take into account the issue of overheating early in the design of homes, their orientation and location in the development alongside other amenity issues in relation to design. How this is achieved will then be demonstrated through the design and access statement alongside other issues rather than as a separate statement.

*Question 16: Electric Vehicle Charging*

*16) Do you think the Local Plan should set out criteria for the design and location of Electric Vehicle Charging points?*

1. With regard to residential development the 2021 edition of Part S of the Building Regulations sets out the appropriate level and type of provision required. As such further policy is not needed in relation to residential development.

*Question 17: Carbon Sinks*

*17) Do you agree the new Local Plan should include a policy which sets out how*

*development proposals should protect and enhance carbon sinks across Peterborough?*

1. What is not clear within the consultation document is how the Council will define a carbon sink. The consultation document refers to peatlands, however these are protected habitats and as such would not be considered suitable for development. If the Council are to take forward such a policy, it will be essential that it is supported by a robust evidence base and clear approach to defining what is defined as a carbon sink to avoid confusion for both decision makers and applicants. The Council will also need to consider how this policy relates to BNG which ensures that any habitats lost through development are replaced and improved upon.

*Question 20: Meeting Housing Needs*

*20a) What size, types and tenure of homes do you think are needed, either across Peterborough or in your local area?*

1. The Council will need to undertake a housing needs assessment to obtain a broad understanding the type of home that is required across Peterborough. However, whilst such studies are helpful, they are only snap shots in time and that needs can change over the life of the plan and vary depending on the location of a site and what has already been built. Therefore, any policy approach should provide for sufficient flexibility to respond to different needs based on the location of the site and any updated evidence on bot need and supply.

*20b) Are there any other specific groups or specific housing types that you think are missing from the above list and should be included?*

1. The Council will need to take account of the needs of older people and demand for retirement accommodation. The HBF consider it important that local plans look to allocate specific sites to meet the needs of older people. In particular the Council must look, in the first instance, to allocate those sites submitted for older people’s accommodation that are in the most sustainable locations close to key services. We would also suggest that the local plan goes further and looks to set out in policy:
* a target for the delivery of homes for older people and maintains a supply of land to meet that target. Whilst we recognise that there is not a requirement in national policy for the Council to maintain a specific supply of accommodation for older people identifying the level of need and monitoring supply would aid decision makers in the application of this policy and ensuring needs are met over the plan period. Such an approach would also ensure effective monitoring in relation meeting the needs of older people and encourage positive decision making if there is a deficiency in supply.
* support and encouragement for older persons accommodation on brownfield and other land in established urban and suburban environments and which is not allocated (i.e., windfall sites) given the level of need and that older people are most likely to prefer to continue to reside in established areas with which they are familiar.

*20c) If new evidence identifies a continued need for more rented tenure affordable housing, should this be prioritised over the provision of first homes?*

1. The only concern the HBF has with regard to affordable housing mix is the need to ensure that development is able to viably deliver the level of affordable housing that is being proposed. With this in mind it will be important that policies regarding the tenure split are flexible to allow for changes in the split which might ensure a scheme can viably deliver the overall level of affordable housing required by the local plan.

*Question 21: Entry Level Housing*

*21a) How do you think the new Local Plan should address the need for entry level housing? Please provide reasons for your answer*

1. The HBF would support the use of exception sites to support the delivery of entry level housing. This approach is consistent with national policy and can deliver homes to support younger households access the housing market in areas that they may otherwise be beyond their ability to afford.

*Question 22: Housing Standards 22a) Should evidence identify a need; do you think the Local Plan should include requirements for wheelchair accessible and/or adaptable homes? If so, why?*

1. As well as considering the need for such homes the Council will also need to consider the impact on viability of requiring these homes, as set out in paragraph 56-007 of PPG. The Council will also need to distinguish between wheelchair accessible homes which can only be required where the local authority has nomination rights for that property and wheelchair adaptable housing which can be required for both market and affordable homes.

*22b) Should evidence identify a need; do you think the Local Plan should include Internal Space standards for all new homes or should this continue to only be applied to new rented tenure affordable housing? Or should it be extended to cover all affordable housing tenures? If so, why?*

1. As required by paragraph footnote 49 of the NPPF and paragraph 56-022 the Council will need to provide evidence as to both the need for such homes and the impact on the affordability of housing with in the area. It is important that there is an actual need for such a policy as it will restrict the flexibility to meet the needs of some households.
2. Whilst the HBF share the Council desires to see good quality homes we also consider that space standards can, in some instances, have a negative impact upon affordability issues and reduce customer choice. In terms of choice, for example, some developers will provide entry level two, three and four-bedroom properties which may not meet all the optional nationally described space standards, but which would allow on lower incomes can afford a property which has their required number of bedrooms. Therefore, the evidence to introduce space standards should be compelling and that there is a significant number of poor quality homes well below space standards being brough forward in Peterborough.
3. However, even If there is evidence to support the introduction of such standards, the HBF would suggest that some flexibility is added into the policy to allow well designed homes below space standards that seek to meet an identified need for such homes in Peterborough. The Council should also 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.

*22c) Do you have any evidence to suggest that the introduction of the above standards would significantly affect viability of housing schemes?*

1. This will be for the Council to test through the whole plan viability assessment where the cumulative impact of all the polices in the local plan can be considered.

*Question 23: Plots for Custom Build, Self-Build and Prestige Homes*

*23a) Should we require large housing sites to provide serviced plots for self-build and*

*custom build?*

1. 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.
2. If the Council chooses to require the delivery of self-build plots on larger sites, then they will need to provide the evidence to support this policy. Whilst the self-build register will provide a key part of this evidence the Council will need to ensure that it is robust and has been reviewed to ensure that those on the list are still looking to self-build and have the means to do so. The policy must be proportionate and relate to what is needed and not lead to a level of provision that is beyond identified needs.
3. The policy should also include a mechanism as to when self-build plots should return to the developer to be built out. We would recommend a period of 6 months from first being marketed to ensure that changes in conditions required for these to revert to the developer can be agreed prior to completion of the site.

*23b) Should we allocate sites which are specifically set aside only for self-build and custom build to meet the needs of the register?*

1. The HBF considers it appropriate for the Council to work with land owners and developers to identify where self-build might be appropriate and allocate land to meet those needs. The Council will also need to have considered other opportunities to meet their duties to meet demand for self-build housing set out in paragraph 57-029, such as how any land being disposed of for development by the Council could be used to support self-builders. The Council should also consider whether it might be more appropriate to release more small sites for self and custom build housing in the Green Belt rather than rely on larger sites which are less likely to meet the needs of many self-builders. Such an approach would not only better meet the expectations of those looking to build their own home but also ensure the Council meets the government’s expectation for delivery on small sites set out in paragraph 69 of the NPPF.

*Question 24: Gypsies and Travellers*

*24a) If a need for additional Gypsy and Traveller pitches is identified, should large scale housing sites be required to include an element of Gypsy and Traveller provision as part of the masterplanning of the site?*

1. No. The Council should undertake a call for sites to identify sites that could meet the needs of the Gypsy and Traveller community rather than place the burden of provision on large scale housing sites. In particular the Council should fully examine whether it would be possible to meet need through the expansion of existing Gypsy and Traveller sites.

*24b) What other suitable locations for Gypsy and Traveller pitches are there?*

1. See above.

*Question 28: Development in the Countryside*

*28) Should the Local Plan include a policy about development in the countryside and requirements to support the rural economy?*

1. See response to question 6.

*Question 36: Green and Blue Infrastructure Network*

*36) Do you think the new Local Plan should include an ‘Urban Greening Factor’ target score for development schemes to meet or exceed? Should this be applied across the whole of Peterborough, or vary by location or type of development?*

1. What is not clear from the consultation document is the level of urban greening that would be required through the use of the Urban Greening Factor, whether this would area specific, nor how it would relate to the 10% Biodiversity Net Gain (BNG) required by the Environment Act. 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 knowing the level of “greening” that may be required on a site it is also impossible to know how this might impact on the viability of development, especially the higher density developments that are likely to be a key source of new homes in Peterborough.
2. Therefore, without further detail it is not possible to state whether this is an appropriate approach for Peterborough. However, if the Council were to take forward the use of the urban greening factor, we would suggest that it is not a requirement on all sites. For example, small sites or sites near existing open spaces might be encouraged but not required to use the urban greening factor to inform the design.

*Question 42: Biodiversity Net Gain*

*42a) Do you think the new Local Plan should set a higher % of BNG than the national requirement of a minimum 10%? If so, what % should this be? Please give reasons for your answer*

1. No. The HBF does not support increasing the percentage requirment for BNG above 10%. Whilst we recognise the Government has stated that higher requirements can be set in local plans, we are concerned that this may for some development be undeliverable without significant offsite contributions and that, in the short term at least, the market for offsite credits is not sufficiently mature to support a higher requirment. In fact, we are concerned that the market is not sufficiently mature to support developments to achieve the statutory minimum let alone a higher percentage.
2. There is also the risk that the cost of offsite delivery may escalate as demand for offsite credits exceeds the market’s ability to supply these. Even at 10% BNG many sites will need to deliver some net gains offsite. Therefore, a higher percentage will require significantly more offsite delivery as anything above 10% is unlikely to be deliverable onsite, especially for small and medium sized sites. This will create significant demand for offsite units locally. At present the local market for credits in many areas is immature and will struggle to meet demand – a situation that will only worsen if a higher percentage of BNG is required. This situation will result in the price of local credits increasing alongside demand and developers having to purchase credits outside of the local area in order for their development to commence. Both could add substantially to the cost of development.
3. As the market matures and units are less scarce this issue may well be addressed. However, it should also be recognised that where development has to deliver off site net gains outside of the local area these generate fewer biodiversity units using the latest metric due to the spatial risk multiplier, compared to offsite delivery in the same location or national character area. Therefore, requiring levels of BNG over the 10% minimum, which is likely to require more offsite delivery, will be significantly more expensive in the short and medium term in order to proceed with their development. In addition, increasing demand may well increase costs across the region with more developers chasing a limited number of available credits.
4. Whilst a national statutory biodiversity credit will be available to support development where there is an absence of local offsite credits, this will be set at higher price to encourage the development of local markets for credits placing additional pressure on the viability of new development in Basildon. Therefore, the HBF suggests that the focus of the Council should be in supporting development to deliver the 10% minimum and seeking to improve the market for biodiversity credits locally not on placing further additional requirements and costs onto development that will affect its deliverability.
5. The Council will also need to ensure that proper consideration is given to the cost implications of achieving 10% BNG. There will always be significant uncertainty as to how much this will cost given that it is dependent on the base level of biodiversity on each development site. In time a clearer picture of the costs of delivering 10% BNG will arise, and it will be important for these to be taken into account but until then the Council needs to ensure that there is significant headroom within its viability assessment to ensure that sufficient account is made for the costs of delivering BNG.

*Question 43: Trees, Woodland and Hedgerows*

*43a) Should the new Local Plan ensure that new streets are tree-lined unless there were justifiable reasons why this would be inappropriate?*

1. PPG recognises that street trees can enhance the built environment and provide a wide range of benefits. However, the HBF would suggest that these are encouraged as part of a wider approach to landscaping rather than a specific requirement. In some circumstances street trees will be appropriate however on some sites the developer may seek to use other approaches such pocket parks as means of breaking up urban form and delivering tree cover to secure wider benefits of tree planting in the urban area. The approach taken should be informed by the site and the development being delivered rather than by a strict policy for street trees.

*43c) Should the new Local Plan set an area wide target for tree canopy cover for all development to achieve? If so, should this target be the same as the council’s (25%), higher or lower?*

1. No. Whilst the NPPF is supportive of the delivery of trees this should be part of a wider landscaping scheme that delivers the required open space and BNG. It may be the case that in order to deliver the necessary BNG on site a 25% tree canopy cover may not be deliverable.

**Conclusion**

1. We hope you find these comments helpful, and we would welcome the opportunity to discuss any these issues further if necessary.

Yours faithfully



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**Appendix 1 – Ashford Local Plan Policy HOU5 - Residential Windfall Development in the Countryside**

Proposals for residential development adjoining or close to the existing built up confines of the following settlements will be acceptable:

Ashford, Aldington, Appledore, Bethersden, Biddenden, Brabourne Lees/Smeeth, Challock, Charing, Chilham, Egerton, Great Chart, Hamstreet, High Halden, Hothfield, Kingsnorth\*, Mersham, Pluckley, Rolvenden, Shadoxhurst, Smarden, Tenterden (including St Michaels), Wittersham, Woodchurch and Wye. \*Existing Kingsnorth village

Providing that each of the following criteria is met:

a) The scale of development proposed is proportionate to the size of the settlement and the level, type and quality of day-to-day service provision currently available and commensurate with the ability of those services to absorb the level of development in combination with any planned allocations in this Local Plan and committed development in liaison with service providers;

b) The site is within easy walking distance of basic day to day services in the nearest settlement, and/or has access to sustainable methods of transport to access a range of services;

c) The development is able to be safely accessed from the local road network and the traffic generated can be accommodated on the local and wider road network without adversely affecting the character of the surrounding area;

d) The development is located where it is possible to maximise the use of public transport, cycling and walking to access services;

e) The development must conserve and enhance the natural environment and preserve or enhance any heritage assets in the locality; and,

f) The development (and any associated infrastructure) is of a high-quality design and meets the following requirements:

i) it sits sympathetically within the wider landscape,

ii) it preserves or enhances the setting of the nearest settlement,

iii) it includes an appropriately sized and designed landscape buffer to the open countryside, it is consistent with local character and built form, including scale, bulk and the materials used, it does not adversely impact on the neighbouring uses or a good standard of amenity for nearby residents, it would conserve biodiversity interests on the site and / or adjoining area and not adversely affect the integrity of international and national protected sites in line with Policy ENV1.

Residential development elsewhere in the countryside will only be permitted if the proposal is for at least one of the following:

* Accommodation to cater for an essential need for a rural worker to live permanently at or near their place of work in the countryside;
* Development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;
* It is the re-use of redundant or disused buildings and lead to an enhancement to the immediate setting;
* A dwelling that is of exceptional quality or innovative design\* which should be truly outstanding and innovative, reflect the highest standards of architecture, significantly enhance its immediate setting and be sensitive to the defining characteristics of the local area;
* A replacement dwelling, in line with policy HOU7 of this Local Plan;

Where a proposal is located within or in the setting of an AONB, it will also need to demonstrate that it is justifiable within the context of their national level of protection and conserves and enhances their natural beauty.

1. Embodied and Whole Life Carbon: 2023-20925 Implementation Plan for the Home Building Industry. (Future Homes Hub 2023) [↑](#footnote-ref-1)
2. ASHP deliver a 49% reduction in whole life carbon emissions with fabric options achieving around a 7% improvement. [↑](#footnote-ref-2)