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15/10/2024

Dear Leicestershire County Council,

**Charnwood Transport Contributions Strategy Consultation August 2024**

1. Thank you for consulting the HBF Home Builders Federation (HBF) Charnwood Transport Contributions Strategy. We have significant concerns about the premise and legality of the approach being proposed.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.
3. It is disappointing to note that that despite the engagement of the HBF and its members on this issue to date and the industry's request to both Leicestershire County Council and Charnwood Borough Council to reconsider their proposed approach to transport contributions, the Charnwood Transport Contributions Strategy continues to attempt to introduce roof tax-style transport contributions policies to sites within Charnwood. Such an approach is simply unjustified and inappropriate. Policy making about Section 106 contributions should only be done through the plan-making process.
4. HBF is also concerned that the proposed approach could make housing delivery in Charnwood unviable. The new government is committed to delivery 1.5 million new homes over the next 5 years. In the midst of a housing crisis, it is incredibly frustrating that the County Council is seeking to require Local Planning Authorities to ask for unjustified and potentially illegal transport contributions that fail to comply with the CIL regulations.
5. As an industry there is a strong desire to develop new housing within Charnwood. The industry recognises that there is a need to mitigate the impact new developments, but developers cannot and should not be expected to pay to address existing deficiencies.
6. I trust that the Council will find these comments useful. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
7. Please let me know if you have any further questions.

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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