



Programme Officer
Herefordshire Local Plan Core Strategy
c/o Herefordshire Council
Plough Lane
Hereford
HR1 0LE

SENT BY E-MAIL AND POST

22nd May 2015

Dear Sir / Madam

HEREFORDSHIRE LOCAL PLAN CORE STRATEGY MAIN MODIFICATIONS CONSULTATION

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation to which we submit the following representations.

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.

The Council should re-consider the following Policies for conformity with the Written Ministerial Statement dated 25th March 2015 :-

- H3 – Housing Mix (**MM044**) in particular Bullet Point (2) "provide housing capable of being adapted" ;
- SD1 – Sustainable Design & Energy Efficiency (**MM058**) in particular reference to Secure By Design standards, on-site renewable energy and exceeding Building Regulation standards ;
- SD3 – Sustainable Water Management & Water Resources (**MM066**) in particular reference to achieving the optional housing standard of 110 litres per person per day in Bullet Point (6).

If after re-checking these Policies are found to be incompatible with the Written Ministerial Statement further modifications should be undertaken. Otherwise without modification such policies would fail the NPPF test of soundness set out in paragraph 182 which requires compliance with national policy.

With reference to **MM61** the Council should be mindful that the NPPF (paragraph 154) specifies that Supplementary Planning Documents (SPD) should not add to the financial burden of development. The Regulations are equally explicit in limiting the remit of an SPD so that policies dealing with development management cannot be hidden in an SPD.

We trust that these representations are helpful in informing the final stages of the Herefordshire Local Plan Core Strategy. In the meantime if you require any further information or assistance please contact the undersigned.

Yours faithfully
for and on behalf of **HBF**



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