

## THE HOME BUILDERS FEDERATION

Date: 29th October 2015 Consultee ID: 707

Matter: 7

## SEFTON LOCAL PLAN EXAMINATION

## Matter 7 - DESIGN, ENVIRONMENTAL QUALITY AND ENVIRONMENTAL ASSETS

The HBF would like to submit the following further comments in respect of Issue 7a, question 7.2. The HBF has no further comments, at this stage, in relation to Issue 7a, questions 7.1 and 7.3 to 7.13 inclusive.

Issue 7a: Whether the policies relating to design and environmental quality are justified and consistent with national policy.

7.2 By requiring major development to incorporate at least one specified energy efficiency measure, is policy EQ7 consistent with the government's streamlining of housing and construction standards? Does the text accompanying policy EQ7 merit updating to reflect recent changes to the housing technical standards regime and the non-implementation by government of the Allowable Solutions framework?

The HBF does not consider Policy EQ7 or the supporting text to be consistent with the streamlining of housing and construction standards. The ministerial statement dated 25<sup>th</sup> March 2015 clearly identifies that in relation to housing energy efficiency measures will be solely dealt with through the Building Regulations and optional standards do not apply. The Council cannot, therefore, require developers to go beyond the Building Regulations. Policy EQ7, as submitted, is clearly contrary to the national government stance upon this issue.

The HBF also consider that the text supporting policy EQ7 should be amended to reflect the recent announcements regarding the Allowable Solutions framework.

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