



Planning Policy
North Devon Council
Civic Centre
Barnstaple
EX31 1EA

SENT BY E-MAIL AND POST

27 October 2016

Dear Sir / Madam

NORTH DEVON & TORRIDGE JOINT LOCAL PLAN MAIN & MINOR MODIFICATIONS CONSULTATION

Introduction

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. 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. We would like to submit the following representations and in due course attend the Joint Local Plan Examination Hearing Sessions to debate these matters in greater detail.

PMM/1 – Policy ST05 : Sustainable Construction & Buildings. Under the Deregulation Act 2015 the Council may require a proportion of the energy used in residential development to be derived from local renewable or low-carbon sources but the Act removes the requirement for development to exceed the energy performance requirements set out in the Building Regulations. Policy ST05 should allow developers to select the most appropriate way to achieve the policy aim "to minimise energy consumption". It is most likely that this policy aim can be achieved by a fabric first approach using the integration of passive design and energy efficiency measures without resorting to renewable and / or low carbon energy generation. This likelihood should be reflected in Policy ST05. It is suggested that an amendment to para 3.38 should also have been incorporated into these proposed Main & Minor Modifications.

The HBF is supportive of the following proposed modifications :-

- **PMM/2** – deletion of the higher optional water efficiency standards ;
- **PMM/10** – deletion of the reference to Lifetime Homes ;
- **MM/3** - deletion of the reference to the Code for Sustainable Homes.

Conclusion

It is hoped that these responses are helpful in informing the next stages of the North Devon & Torridge Joint Local Plan. If any further information or assistance is required please contact the undersigned.

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



Susan E Green MRTPI
Planning Manager – Local Plans