

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

21/07/2020

Dear Sir/ Madam

Response by the Home Builders Federation to the consultation on the Guildford Local Plan: Development Management Policies – Issues, Options and Preferred Options

Thank you for consulting the Home Builders Federation (HBF) on the preferred options for its development management policies. 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.

Housing Density

The HBF agrees with the Council's preferred option set out in policy H4. We recognise the need to ensure that that optimal use of the land is achieved but it is important to ensure that there is flexibility within policies on density to ensure that the development being proposed is right for the location and topography of the site.

Biodiversity net gain

The HBF recognises the importance of new development supporting improvements in biodiversity and the decision to place legislative requirements on new development with regard to delivering net gains to biodiversity. Whilst we have raised concerns with the Government regarding the level at which net gains might be set, we consider it essential that the percentage required in legislation is not varied by local authorities. As the Council have set out in the consultation document the additional cost of any net gain proposed by Government is expected to come off the land value. A consistently applied national policy will help with this regard with all parties fully aware of the legislative requirements. However, in order to ensure this nationally consistent approach is effective it is essential that individual councils do not seek to move away from any required standards.

As such we are concerned that the Council's preferred option is to set the required biodiversity net gain from all development at 20%. As the Council note this is higher than the 10% being proposed in the Environment Bill. The justification provided by the Council is that a higher level necessary due to the uncertainty in achieving net gains



through the minimum 10% target and limited additional cost on development of providing 20% net gains.

However, the Government have stated that 10% achieves a level of improvement which the Government consider to, on balance, strikes “*the right balance between ambition, certainty in achieving environmental outcomes, and deliverability and costs for developers*”. If the Government are confident that a 10% requirement will deliver genuine net gain, offset the impacts of development and ensure development continues to come forward the Council should not seek to require additional improvements to address the impact of other factors that have led to the decline in biodiversity across Surrey.

The Council also point to the limited additional cost of providing a 20% improvement, however this has not been tested by the Council. The costs set out in the impact assessment are very broad and may not reflect the local cost of meeting a much higher target – especially if offsetting is required. There is also likely to be a much higher amount of open space required to meet the higher standard reducing the developable area of any site and reducing the level development achieved on every site affected by this policy.

Most importantly it is essential that the Council's policy is consistent with the legislation – a point noted paragraph 4.65 of the consultation document. The Council have seemingly failed to grasp the reason as to why a consistent approach is being advocated by the Government. As mentioned earlier, by setting a national standard the development industry, landowners and resident understand what is expected and how it can be delivered regardless of locality. Such a level playing field provides consistency in provision and will help to speed up the planning process. Diverging from this minimum requirement will inevitably create a conflict with legislation and create confusion and delay. As such we do not support the Council's preferred option. The Council should not seek to diverge from emerging legislation and policy and should amend its approach to reflect the Government's most up to date legal and policy position.

Climate change mitigation

We support the Council's option to only consider the necessary policy following the outcome of the consultation on the Future Homes standards. The HBF consider that improvement in building standards should be consistent across the country and allow for a reasonable transition period to ensure the continued delivery of new homes alongside improving standards related to energy efficiency and carbon emissions. Such an approach can only be achieved through building regulations and not through individual local plans.

Parking Standards

The Council is proposing to include requirements for the provision of electric vehicle charging infrastructure in new developments. The HBF is supportive of encouragement

for the use of electric and hybrid vehicles via a national standardised approach implemented through the Building Regulations to ensure a consistent approach to future proofing the housing stock. Recently, the Department of Transport held a consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings (ended on 7th October 2019).

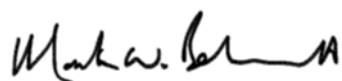
This consultation set out the Government's preferred option to introduce a new functional requirement under Schedule 1 to the Building Regulations 2010, which is expected to come into force in 2020. The inclusion of Electric Vehicle Charging Points (EVCP) requirements within the Building Regulations 2010 will introduce a standardised consistent approach to EVCPs in new buildings across the country. The requirements proposed apply to car parking spaces in or adjacent to buildings and the intention is for there to be one charge point per dwelling rather than per parking space. Given that the Government is proposing to include requirements for EVCPs in Building Regulations we do not consider it necessary for them to be included in this policy.

The consultation also sets out the technical standards for the provision of electrical charging points and it will be important that the Council consider these specifications and the additional costs to developers of providing EVCP. In particular the Government recognises that the cost of installing charge points will be higher in areas where significant electrical capacity reinforcements are needed. In certain cases, the need to install charge points could necessitate significant grid upgrades, which will be costly for the developer. Some costs would also fall on the distribution network operator but the consultation outlines that any potential negative impact on housing supply should be mitigated with an appropriate exemption from the charge point installation requirement based on the grid connection cost. The consultation proposes that the threshold for the exemption is set at £3,600. In the instances when this cost is exceptionally high, and likely to make developments unviable, it is the Government's view that the EVCP requirements should not apply and only the minimum Energy Performance of Buildings Directive requirements should be applied. As such if the Council wishes to ensure provision of EVCPs it may need to adjust other policy requirements within its local plan.

Conclusions

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. The HBF would like to be kept informed of the progress of the document. Please use the contact details provided below for future correspondence.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Mark Behrendt', with a stylized flourish at the end.

Mark Behrendt MRTPI

Planning Manager – Local Plans
Home Builders Federation
Email: mark.behrendt@hbf.co.uk
Tel: 07867415547