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08/12/2020

Dear Sir / Madam,

WAKEFIELD DISTRICT LOCAL PLAN 2036: INITIAL DRAFT

1. Thank you for consulting with the Home Builders Federation (HBF) on the Wakefield District Local Plan 2036.
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. We would like to submit the following comments on Volume 1: Development Strategy, Strategic and Local Policies consultation document. These responses are provided in order to assist Wakefield Council in the preparation of the emerging local plan. The HBF is keen to ensure that Wakefield Council produces a sound local plan which provides for the housing needs of the area.

Plan Period

4. It is noted that the Plan period runs from 2017/18 until 2035/36. Paragraph 22 of the NPPF looks for Plans to have a 15-year period from adoption. As the consultation is only just being undertaken for the Regulation 19 stage, it is unlikely that the Plan will be adopted in 2020/21. Therefore, the HBF considers that it may be beneficial to take a cautious approach and to extend the Plan period.

Policy WSP 5: Scale and Distribution of Additional Housing

Policy WSP5 is not considered to be sound as it is not positively prepared, justified or consistent with national policy for the following reasons:

Housing Requirement

5. This policy states that the Local Plan will allocate land to accommodate the housing requirement for the period 2017/18 to 2035/36. It states that the housing requirement is a range using the standard method as the base of the range and a figure of 1,400 homes a year will provide the top of the range.
6. The HBF does not consider that the policy is clearly written and unambiguous as required by the NPPF. The HBF considers that a range is not appropriate, it suggests that the top figure would be a maximum and could limit development of homes. The HBF does not consider that this is line with national policy which looks to support the Government's objective of significantly boosting the supply of homes. It is also not in line with paragraph 60 of the NPPF which states that *'to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals'*.
7. The HBF has considered the local housing need (LHN) using the Standard Methodology set out in PPG, it can be calculated as follows:

Step 1 - Setting the baseline:

2014-based household projections in England average annual household growth over a 10-year period, with the current year being used as the starting point. The household projection for 2020 was 149,668 and in 2030 it is 158,454, therefore the growth equals 8,786, giving an average of 878.6 households each year.

Step 2 - An adjustment to take account of affordability:

The most recent median workplace-based affordability ratio for Wakefield (2019) is 5.66.

Where an adjustment is to be made, the formula is:

$$\text{Adjustment factor} = \left(\frac{\text{Local affordability ratio} - 4}{4} \right) \times 0.25 + 1$$

Minimum annual local housing need figure = (adjustment factor) x projected household growth.

For Wakefield this would be: Minimum annual local housing need figure = (1.10375) x 878.6 = **969.75**.

Step 3 - Capping the level of any increase

The Wakefield Core Strategy was adopted in 2009, therefore the local housing need figure is capped at 40% above whichever is the higher of: the projected household growth for the area over the 10-year period identified in step 1; or the average annual housing requirement figure set out in the most recently adopted strategic policies.

The Wakefield Core Strategy has a housing requirement of 1,600 dwellings per annum (dpa) (2008-26), 40% above the 1,600 would be 2,240dpa. The capped figure is greater than the minimum annual local housing need figure and therefore does not limit the increase to the local authority's minimum annual housing need figure.

Therefore, the minimum LHN for Wakefield as calculated by the standard method is **970 dwellings each year**.

8. It should be noted that the Standard Method identifies a minimum annual housing need figure, it does not produce a housing requirement figure. It should also be noted that the Government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The Standard Method provides a minimum starting point, and there may be circumstances where it is appropriate to consider whether the actual housing need is higher than the Standard Method indicates. PPG (ID: 2a-010) goes on to state that these circumstances can include growth strategies for the area; strategic infrastructure improvements; previous levels of delivery; or where previous assessments of need are significantly greater than the outcome from the Standard Method.
9. The Housing Technical Paper (October 2020) considers these circumstances and clearly identifies that there are growth strategies for the area including the Wakefield District Economic Strategy, which seeks to maintain current high levels of housebuilding and sets a vision for a quality and mixed housing offer in the district. The Leeds City Region Strategic Economic Plan which sets housing growth a key priority for achieving inclusive growth and identifies the City Fields urban extension and the Aire River Growth corridor as housing growth areas. The Paper also states that the Council is pursuing various funding streams for housing growth in the district.
10. The Housing Technical Paper goes on to identify the strategic infrastructure improvements which the Council is seeking to provide to ensure housing growth is appropriately supported. These include the South Featherstone Link Road, the Knottingley Relief Road, Castleford Growth Corridor Scheme, Leeds City Region Inclusive Growth Corridors and HS2.
11. The Housing Technical Paper also identifies the annual net housing completions between 2012/13 to 2019/20 it identifies an average delivery of 1,541.5dpa, with a peak of 2,112 in 2018/19.
12. The 2019 Strategic Housing Market Assessment (SHMA) states that the 977 dpa, identified as the LHN from the standard method, is too low, and goes on to state that the SHMA therefore supports a housing target of around 1,400 each year.
13. The 2016 SHMA identified an Objectively Assessed Housing Need of 1,524 dwellings each year. Whilst it is noted that the 2016 SHMA was based on the 2012 SNPPs this does not reduce the need to provide for the economic growth of the area. The Wakefield Strategic Housing Market Assessment 2016 (SHMA 2016) identified that the alignment of housing growth with economic growth is a key requirement, and went on to state that 'it is important that the OAN calculation takes account of increased dwelling need linked to jobs growth'. The HBF considers that it is important for the Council to deliver an appropriate level of housing growth that supports economic growth. The SHMA 2016 identified an adjustment to support jobs-led dwelling need of 516 dwellings.
14. The Government have published a consultation on Changes to Planning Policy and Regulations, this includes a new method for calculating the LHN. The new method is considered to align with Government's aspirations for the housing market, provide stability and certainty for all stakeholders and address the issues with the current approach. The HBF notes that this new method for calculating the LHN would see a significant increase to the LHN for

Wakefield, the HBF calculates the new LHN for to be 1,982dpa¹. This significant increase is likely to have implications for how quickly the plan will need to be reviewed particularly if the plan does not identify an appropriate housing requirement or insufficient sites have been allocated to create flexibility in supply.

15. The HBF does not consider that the LHN produced from the Standard Method would provide an appropriate housing requirement, it is evident that the actual housing requirement should be higher. The HBF does not consider that it would be appropriate to limit the housing requirement at the top end of the requirement either, and does not consider that this would be consistent with the NPPF requirement to support the Government's objective to boost the supply of homes. The HBF considers that the clarity of this policy could be improved, and recommend that the range is removed, and that the housing requirement is clearly set out as one net minimum figure. Based on the PPG guidance on the circumstances where it is appropriate to consider whether the actual housing need is higher than the Standard Method indicates, the HBF would suggest that there is clear evidence that the LHN in Wakefield is clearly significantly above the minimum figure provided by the standard method, and is also likely to be above the top end of the range proposed by the Council at 1,400dpa.

Windfall and Allocations

16. The plan proposes to include a windfall allowance and once this is taken into account to allocate sufficient specific sites to deliver the 1,400 homes a year in the period 2017/18 to 2035/36.
17. The HBF would generally recommend that windfall allowances are not included in the supply and instead form part of the flexibility in supply. However, the HBF recommends that if the Council intends to include an allowance for conversions and windfalls that they have an appropriate evidence base to support this. The HBF also considers that historic trends may not always be an accurate reflection. Again, if an allowance is to be included within the supply the HBF would suggest that the allowance is not included within the first three years from examination of the Plan to avoid double counting.

Allocations

18. The HBF does however, support the Council in seeking to ensure they allocate sufficient land to meet their housing requirement. The HBF is keen that the Council produces a plan which can deliver against its housing requirement. To do this it is important that a strategy is put in place which provides a sufficient range of sites to provide enough sales outlets to enable delivery to be maintained at the required levels throughout the plan period. The HBF and our members can provide valuable advice on matters in relation to housing delivery and would be keen to work proactively with the Council on this issue.
19. The HBF also strongly recommends that the plan allocates more sites than required to meet the housing requirement; as a buffer. This buffer should be sufficient to deal with any under-delivery which is likely to occur from some sites. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible. The HBF recommends an appropriate contingency (circa at least 20%) to the overall housing land

¹ Proposed new Standard Method: Existing Stock = 157,296, 0.5% of Existing Stock = 786.48, 2018-based household projections – 2020 = 152,063, 2030 = 167,591, average = 1,553, Ratio of median house price – 2009 = 4.97, 2019 = 5.66, Adjustment Factor = 1.27625, New LHN = 1,981.76dpa

supply to provide sufficient flexibility for unforeseen circumstances and in acknowledgement that the housing requirement is a minimum not a maximum figure.

Five Year Supply

20. The policy states that a five-year supply of specific, deliverable sites will be maintained at all times. Whilst the HBF supports the Council in the commitment to maintain a five-year supply, it would be useful if the policy provided more detail as to how the Council intends to ensure that this five-year supply is maintained.
21. The policy goes on to suggest that the five-year supply throughout the plan period will be calculated using the minimum annual local housing need figure using the standard method. The HBF does not consider this is appropriate. As previously set out, the HBF does not consider it is appropriate to have the housing requirement as a range, does not consider that the LHN identified by the standard method is actually the appropriate LHN for the district and does not consider that using the LHN in place of the housing requirement that should be set out in the Plan is appropriate. NPPF² and PPG³ are both clear that the Council should identify and update annually a supply of specific deliverable sites to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies or against their local housing need where the policies are more than five years old. Therefore, the HBF does not consider that the approach proposed is in line with the NPPF or PPG.

Spatial Distribution

22. The HBF does not wish to comment upon the acceptability or otherwise of individual sites. It is, however, important that all the sites contained within the plan are deliverable over the plan period and planned to an appropriate strategy. The HBF would expect the spatial distribution of sites to follow a logical hierarchy, provide an appropriate development pattern and support sustainable development within all market areas.

Residential Density

23. The policy proposes a density of at least 50dph in Wakefield city centre and Castleford and Pontefract town centres and within 500m of a rail and bus station public transport hubs; at least 40dph throughout the rest of Wakefield, Castleford and Pontefract; at least 30dph in other urban areas, local service centres, villages and the Green Belt. The policy does state that in circumstances where individual site characteristics dictate and are justified, a lower density may be acceptable.
24. The HBF considers that part (a) of this policy may benefit from being a list to improve clarity, e.g.:
- a) At least 50 homes a hectare in:
 - i. Wakefield city centre;
 - ii. Castleford and Pontefract town centres; and
 - iii. Within 500m of rail and bus station public transport hubs.
25. The flexibility provided by this policy in relation to individual site characteristics is noted, however, the HBF would recommend further amendments could be made to create greater flexibility to allow developers to take account of the evidence in relation to demand, market aspirations and viability.

² Paragraph 73

³ ID: 68-002-20190722

26. The Council will also need to consider its approach to density in relation to other policies in the plan. Policies such as open space provision, space standards and parking provision will all impact upon the density which can be delivered upon site.

Policy WSP 6: Housing Mix, Affordability and Quality

Policy WSP6 is not considered to be sound as it is not justified or consistent with national policy for the following reasons:

Housing Mix

27. This policy looks for all housing to provide a broad mix of homes, with large sites (60 homes or 2 ha) needing to reflect the local need for different types of specialist housing, for different sizes of homes, price and tenure.
28. The HBF understands the need for a mix of house types, sizes and tenures and is generally supportive of providing a range and choice of homes to meet the needs of the local area. It is, however, important that any policy is workable and ensures that housing delivery will not be compromised or stalled due to: overly prescriptive requirements; requiring a mix that does not consider the scale of the site; or the need to provide additional evidence. The HBF recommends a flexible approach is taken regarding housing mix which recognises that needs and demand will vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location.
29. It is not clear why a threshold of 2ha or 60 dwellings has been used within this policy, it does not appear to be justified by any evidence.
30. It is also not clear from the policy what is meant by the requirement for larger sites to provide different types of specialist housing to reflect the local need.

Affordable Housing

31. This policy requires sites of 15 or more homes in the urban area or local service areas; and sites of 10 or more homes in villages, the green belt or outside of a settlement to provide affordable homes. It sets out 4 housing viability value areas with a minimum affordable housing requirement ranging from 0% in area 4 to 30% in area 1.
32. The 2019 SHMA identifies an annual net imbalance of 3,090 affordable homes. This need for affordable homes is not disputed by the HBF and indeed the HBF generally supports the need to address the affordable housing requirements of the Borough.
33. The 2019 Residential Viability Report has tested the affordable housing policy, it highlights that viability varies significantly across the district. It has tested affordable housing requirements from 30% down to 10% to determine which is the most appropriate requirement in each area. It considers that it is safest to utilise the requirements as now set out in the policy, with area 1 requiring 30%, area 2 requiring 20%, area 3 – 10% and area 4 – 0%.
34. The policy also states that *'for all proposals where affordable housing is required at least 10% of the required affordable housing provision should be provided as affordable home ownership tenures'*. The HBF does not consider that this is in line with the NPPF⁴ states that where major

⁴ Paragraph 64

development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership. The HBF considers that this means that Policy WSP 6 should be amended to as follows *'for all proposals where affordable housing is required at least 10% of the required affordable housing provision should be provided as affordable home ownership tenures'*, this would bring the policy in line with the NPPF.

Policy WSP 7: Specialist Housing

Policy WSP7 is not considered to be sound as it is not justified or consistent with national policy for the following reasons:

35. This policy states that *'with regard to market accommodation for older people, retirement living or sheltered housing and extra care housing or housing with care is considered as being in use class C3 and relevant housing policies in the Local Plan will be applied to such proposals'*.
36. Use Classes are as defined by the Town and Country Planning (Use Classes) Order, it is therefore not appropriate for the Council to try to determine what will be considered as C3, or not, within a policy. Currently, Use Class C2 is defined as a use for the provision of residential accommodation and care to people in need of care (other than a use within class C3 dwelling houses). Whilst Class C3 is defined as a dwelling house used by a single person or by people to be regarded as forming a single household or not more than six residents living together as a single household where care is provided for residents or not more than six residents living together as a single household where no care is provided to residents.
37. The HBF considers that older people sheltered and extra care accommodation can fall within either use class dependent on the facilities, Use Class C3 (low range) or C2 (higher range), and a judgement will need to be made in each case.

Policy WSP 23: Mitigating and Adapting to Climate Change and Efficient Use of Resources

Policy WSP23 is not considered to be sound as it is not justified or consistent with national policy for the following reasons:

38. This policy states that the Council will encourage all development to incorporate energy from decentralised and renewable or low carbon sources. It then goes on to state that *'All larger development will be required to incorporate on-site renewable energy generation capacity, unless it is not feasible or viable or there are demonstrable alternative decentralised and renewable, or low carbon sources'*.
39. The HBF is generally supportive of the use of low carbon and renewable energy, however, in considering the requirement for the inclusion of renewable energy within developments the Council must test the impact of this policy viability and should be explicitly addressed within the whole plan viability assessment. It will also be necessary to ensure that the policy is flexible and allows for the variation of local requirement on the basis that its provision is either unfeasible or unviable, as required by paragraph 153 of the NPPF.

Policy WLP 2: Accessible Housing Standards

Policy WLP2 is not considered to be sound as it is not justified or consistent with national policy for the following reasons:

40. This policy requires new build residential developments over 0.5ha or 10 or more homes should include 9% of homes at M4(2) standard and 3% of homes at M4(3) standard. It also states that on smaller sites, where percentages would deliver less than one homes, one home should be provided to meet the relevant building regulation.
41. The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. However, if the Council wishes to adopt the higher optional standards for accessible, adaptable and wheelchair homes the Council should only do so by applying the criteria set out in the PPG.
42. PPG (ID 56-07) identifies the type of evidence required to introduce such a policy, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability. It is incumbent on the Council to provide a local assessment evidencing the specific case for Wakefield which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy.
43. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommend that an appropriate transition period is included within the policy. The 2019 SHMA has reappraised the Supported and Specialist Housing Need Report 2018 and provides some limited information in relation to the need for accessible and adaptable properties, utilising national data and the 2015 Household Survey, however, the HBF does not consider this work is sufficiently detailed to support the introduction of these optional standards.

Policy WLP 3: Minimum Space Standards for Homes

Policy WLP3 is not considered to be sound as it is not justified or consistent with national policy for the following reasons:

44. This policy requires all new homes to comply with the Nationally Described Space Standard (NDSS).
45. The NDSS as introduced by Government, are intended to be optional and can only be introduced where there is a clear need and they retain development viability. As such they were introduced on a 'need to have' rather than a 'nice to have' basis.
46. PPG (ID 56-020) identifies the type of evidence required to introduce such a policy. It states that *'where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:*
 - **Need** – *evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
 - **Viability** – *the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
 - **Timing** – *there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions'.*

47. The Council will need robust justifiable evidence to introduce any of the optional housing standards, based on the criteria set out above. The HBF considers that if the Government had expected all properties to be built to NDSS that they would have made these standards mandatory not optional. The HBF does not consider that the Council currently has the evidence to demonstrate that this standard is necessary and it has not appropriately considered the implications of introducing such a standard.
48. The National Housing Space Standards Need Assessment document provides the Council's evidence. The Council have considered 25 housing schemes, comprising 1,105 homes, and they measured 145 dwellings within this. They suggest that their findings show that only 14% of the dwellings measured complied with the NDSS. The Council, therefore, consider that this means that there is a need for the NDSS to be introduced.
49. The HBF does not consider that this is sufficient evidence to demonstrate need for the introduction of the NDSS. The Council have not provided evidence to show that these homes have not sold or that the residents of these properties are in anyway unsatisfied with their home. They have also provided no consideration of how these properties compare to other properties within the market area. The HBF considers that if the Government had just expected all properties to be built to NDSS that they would have made these standards mandatory not optional.
50. The HBF considers that standards can, in some instances, have a negative impact upon viability, increase affordability issues and reduce customer choice. In terms of choice some developers will provide entry level two, three and four-bedroom properties which may not meet the optional nationally described space standards but are required to ensure that those on lower incomes can afford a property which has their required number of bedrooms. The industry knows its customers and what they want, our members would not sell homes below the enhanced standard size if they did not appeal to the market.
51. It should be noted that the HBF's Annual Industry Customer Satisfaction Survey⁵ published March 2020 and completed by 63,418 new homeowners highlights that 91% of people who have bought a new home would do so again. It also highlights that 93% of homeowners are satisfied with the internal design and layout of their new home. This does not suggest that new homeowners have issues with the size of rooms provided or that there is a need for the NDSS to be introduced.

Policy WLP 32: Electric Vehicle Charging Infrastructure

Policy WLP32 is not considered to be sound as it is not justified or consistent with national policy for the following reasons:

52. This policy requires all applications for new development to meet the minimum standards of provision for electric vehicle charging points for residential development this is 1 charging point per dwelling with an associated dedicated parking space and where spaces are unallocated 1 charging point per 10 spaces.
53. Whilst the HBF does not oppose the provision of electric charging points, an element of flexibility would be beneficial and is considered to be compliant with the NPPF, paragraph 105.

⁵ <https://www.hbf.co.uk/policy/policy-and-wider-work-program/customer-satisfaction-survey/latest-results/>

54. The HBF would also encourage the Council to work with the appropriate infrastructure providers to ensure a balanced and flexible optimised energy system that can cope with the potential for a mix of electrical heating systems and electric vehicle systems.
55. The HBF would also encourage the Council to consider the viability of the provision of electric vehicle charging points particularly if higher standards of charging points are required.
56. This will also apply to Policy WLP 5: Residential Development in Town Centres, which states that *'proposals should include the provision of space for the storage of sustainable modes of transport such as bicycles and, where appropriate, electric vehicle charging points'*.

Policy WLP 34: District Heating and Cooling Infrastructure

Policy WLP34 is not considered to be sound as it is not justified or consistent with national policy for the following reasons:

57. This policy looks for developments of 10 dwellings or more to propose heating and cooling systems according to a hierarchy set out in the policy. The HBF does not consider that Wakefield should be requiring developments to connect to or to install district heating schemes or restricting the use of particular heating methods. The HBF considers that consideration needs to be given to the justification to this policy. If the policy is to be taken forward then consideration needs to be given not just to whether the development is technically viable but also financially viable and subject to viability testing. The HBF also consider that this policy may cause issues for future occupants as it is restricting future consumer choice to that particular provider of heat.
58. The Council should consider the Department for Business, Energy and Industrial Strategy consultation on Heat Networks: Building A Market Framework (ended on 1st June 2020). To meet the Government's legal commitment on reducing greenhouse gas emissions virtually all heat in buildings will require decarbonising. Heat networks are one aspect of the path towards decarbonising heat, however currently the predominant technology for district-sized communal heating networks is gas combined heat and power (CHP) plants. Over 90% of district networks are gas fired. As 2050 approaches, meeting the Government's climate target of reducing greenhouse gas emissions to net zero will require a transition from gas-fired networks to renewable or low carbon alternatives such as large heat pumps, hydrogen or waste-heat recovery but at the moment one of the major reasons why heat network projects do not install such technologies is because of the up-front capital cost. The Council should be aware that for the foreseeable future it will remain uneconomic for most heat networks to install low-carbon technologies.
59. Furthermore, some heat network consumers do not have comparable levels of satisfaction as consumers on gas and electricity networks, and they pay a higher price. Currently, there are no sector specific protections for heat network consumers, unlike for people on other utilities such as gas, electricity or water. A consumer living in a building serviced by a heat network does not have the same opportunities to switch supplier as they would for most gas and electricity supplies. All heat network domestic consumers should have ready access to information about their heat network, a good quality of service, fair and transparently priced heating and a redress option should things go wrong. Research by the Competition and Markets Authority (CMA) found that a significant proportion of suppliers and managing agents do not provide pre-transaction documents, or what is provided contains limited information, particularly on the on-going costs of heat networks and poor transparency regarding heating bills, including their calculation, limits consumers' ability to challenge their heat suppliers

reinforcing a perception that prices are unjustified. The monopolistic nature of heat networks means that future price regulation is required to protect domestic consumers. The CMA have concluded that “a statutory framework should be set up that underpins the regulation of all heat networks.” They recommended that “the regulatory framework should be designed to ensure that all heat network customers are adequately protected. At a minimum, they should be given a comparable level of protection to gas and electricity in the regulated energy sector.” The Government’s latest consultation on heating networks proposes a regulatory framework that would give Ofgem oversight and enforcement powers across quality of service, provision of information and pricing arrangements for all domestic heat network consumers.

Future Engagement

60. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
61. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



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