

SENT BY EMAIL ONLY TO
planningpolicy@dorsetcouncil.gov.uk

15 March 2021

Dear Sir / Madam

DORSET DRAFT LOCAL PLAN CONSULTATION

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 responses to specific questions contained in the Council's consultation document.

Part B : General questions

Do you agree with the suggested approach and what it is trying to achieve?

Duty to Co-operate

As set out in the 2019 National Planning Policy Framework (NPPF), the Council is under a Duty to Co-operate with other Local Planning Authorities (LPA) and prescribed bodies on strategic matters that cross administrative boundaries (para 24). To maximise the effectiveness of plan-making and fully meet the legal requirements of the Duty to Co-operate, the Council's engagement should be constructive, active and on-going. This collaboration should identify the relevant strategic matters to be addressed (para 25). Effective and on-going joint working is integral to the production of a positively prepared and justified strategy (para 26). The Council should demonstrate such working by the preparation and maintenance of one or more Statements of Common Ground (SoCG) identifying the cross-boundary matters to be addressed and the progress of co-operation in addressing these matters. A SoCG should be made publicly available throughout the plan-making process to provide transparency (para 27).

The National Planning Practice Guidance (NPPG) confirms that a key element of Local Plan Examination is ensuring that there is certainty through formal agreements that an effective strategy is in place to deal with strategic matters when Local Plans are adopted (ID 61-010-20190315 & 61-031-20190315). The NPPG explains that a SoCG sets out where effective co-operation is and is not happening throughout the plan-making process (ID 61-010-20190315). The NPPG also sets out that by the time of publication of a Draft Plan, a SoCG



should be available on the Council's website. Once published, the Council should ensure that the SoCG continues to reflect the most up-to-date position of joint working (ID 61-020-20190315). The HBF note that there are no SoCGs accompanying the Draft Dorset Local Plan consultation. This is inconsistent with national policy.

Dorset Council adjoins numerous other LPAs, the HBF would expect the Council to prepare and maintain one or more SoCG with these neighbouring authorities. It is understood that East Devon, South Somerset and Wiltshire anticipate meeting housing needs in full within their own administrative boundaries. However, a level of unmet housing need (as yet unquantified) from Bournemouth, Christchurch & Poole Council, New Forest District Council and / or New Forest National Park Authority may arise. In due course, the housing requirement figure for Dorset may increase to accommodate unmet housing needs. The HBF would expect the strategic cross boundary matter of housing needs to be set out in a SoCG signed by the respective authorities.

In the absence of one or more published SoCG, it is difficult for the HBF and other interested parties to assess if the Council has satisfied the legal requirements of the Duty to Co-operate and the soundness of the Local Plan. The HBF will submit further representations during the pre-submission consultation.

Local Housing Need (LHN) & Housing Requirement

Draft Policy DEV1 sets out a minimum housing requirement of 30,481 dwellings (1,793 dwellings per annum) between 2021 – 2038.

As set out in the 2019 NPPF, strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period (para 65). The determination of the minimum number of homes needed should be informed by a LHN assessment using the Government's standard methodology unless exceptional circumstances justify an alternative approach (para 60). In Dorset, there are no exceptional circumstances to justify an alternative approach.

The NPPG sets out the standard methodology for calculating the LHN figure using demographic data (based on 2014 MHCLG Sub National Household Projections (SNHP)) and an affordability adjustment (based on the latest ONS affordability ratios) (ID 2a-004-20190220). Using the standard methodology, the minimum LHN for Dorset is 1,793 dwellings per annum equivalent to 30,481 dwellings over the plan period 2021 – 2038. This calculation is based on 2014 SNHP, 2020 as the current year and 2019 affordability ratio of 10.06. As set out in the NPPG, the LHN is calculated at the start of the plan-making process but this number should be kept under review and when appropriate revised until the Local Plan is submitted for examination (ID 2a-008-20190220). The minimum LHN for the County may change as inputs are variable, which should be borne in mind by the Council.

The NPPG clearly states that the standard methodology is the minimum starting point in determining the number of homes needed. It does not produce a housing requirement figure (ID 2a-010-20190220). The NPPG explains that “circumstances” may exist to justify a figure higher than the minimum LHN (ID 2a-010-20190220). The “circumstances” for increasing the minimum LHN are listed in the NPPG including, but not limited to, situations where increases in housing need are likely to exceed past trends because of growth strategies, strategic infrastructure improvements, agreeing to meet unmet need from neighbouring authorities or previous levels of housing delivery / assessments of need, which are significantly greater than the outcome from the standard methodology (ID 2a-010-20190220). The NPPG indicates that if previous housing delivery has exceeded the minimum LHN, the Council should consider whether this level of delivery is indicative of greater housing need (ID 2a-010-20190220). The Council should consider if there are “circumstances” to justify a housing requirement above the minimum LHN.

The 2019 NPPF seeks to achieve sustainable development by pursuing economic, social and environmental objectives in mutually supportive ways (para 8). The Council should be seeking to support the long-term sustainability of the County by achieving a sustainable balance between employment and housing growth. A lack of labour should not become a constraint on realising the economic growth potential of the County.

The Council should also recognise economic benefits of housing development in supporting local communities as highlighted by the HBF’s latest publication Building Communities – Making Place A Home (Autumn 2020). The Housing Calculator (available on the HBF website) based on The Economic Footprint of House Building (July 2018) commissioned by the HBF estimates for every one additional house built in Dorset, the benefits for the local community include creation of 3 jobs (direct & indirect employment), financial contributions of £27,754 towards affordable housing, £806 towards education, £297 towards open space / leisure, £1,129 extra in Council tax and £26,339 spent in local shops.

The NPPG states that total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments. As set out in the NPPG, an increase in the total housing figures may be considered where it could help deliver affordable housing (ID 2a-024-20190220). The NPPG also sets out that households whose needs are not met by the market, which are eligible for one or more of the types of affordable housing set out in the definition of affordable housing in Annex 2 of the 2019 NPPF are considered to be in affordable housing need (ID 67-005-20190722). The Council should calculate its affordable housing need as defined by the NPPG. This figure may be significant in comparison to the minimum LHN. It is acknowledged that the Council may not be able to meet all affordable housing needs but a housing requirement above the minimum LHN will make a greater contribution to delivering more affordable housing.

As set out in the 2019 NPPF, the Local Plan should be positively prepared and provide a strategy, which as a minimum seeks to meet its own LHNs in full and is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated (para 35a). It is understood that a level of unmet need (as yet unquantified) from Bournemouth, Christchurch and Poole Council, New Forest District Council and / or New Forest National Park Authority may arise. In due course, the housing requirement for Dorset may increase to accommodate unmet housing needs from neighbouring authorities (also see HBF response to the Duty to Co-operate).

As set out in the NPPG, the Government is committed to ensuring that more homes are built and supports ambitious Councils wanting to plan for growth (ID 2a-010-20190220). The NPPG states that a higher figure “can be considered sound” providing it “adequately reflects current and future demographic trends and market signals”. However, the NPPG does not set any limitations on a higher figure, which is a matter of judgement. The Government’s objective of significantly boosting the supply of homes set out in the 2019 NPPF remains (para 59). The HBF believe that the Council should have been more ambitious. A housing requirement above the minimum LHN would support economic growth, deliver more affordable housing and contribute to unmet housing needs from neighbouring authorities.

Part C : Sites for housing

The HBF have no comments on individual sites proposed for allocation but the correct assessment of availability, suitability, deliverability, developability and viability of these sites is essential. It is critical that the Council’s assumptions on lead in times and delivery rates are correct and realistic, which should be supported by parties responsible for delivery of housing on allocated sites.

Part D : Areas where there are different options for growth

The HBF have no comments on the various options for growth proposed at Alderholt, Gillingham and Wool.

Part E : Specific discussion points

Spatial Strategy / Settlement Hierarchy

Do the boundaries of the four functional areas reflect how the area’s housing markets and economy function?

The four identified functional areas of South East Dorset, Central Dorset, Northern Dorset and Western Dorset are reflective of the area’s housing markets and economy. **Draft Policies DEV2 to DEV5** set out how proposed growth will meet housing needs on the edge of the built-up areas of the Bournemouth / Poole conurbation, towns & other main settlements (Tiers 1 & 2 of the settlement hierarchy) and at the more sustainable villages in Tier 3 of the settlement hierarchy.

The Council's proposed four tiered settlement hierarchy comprises :-

- Large built-up areas (Tier 1) - in South Eastern Dorset, the main built-up area of the Bournemouth, Christchurch & Poole conurbation and in Central Dorset, the county town of Dorchester & the coastal resort of Weymouth ;
- Towns & other main settlements (Tier 2) – market & coastal towns across Dorset and other main settlements in South Eastern Dorset located close to the main built up area of Bournemouth, Christchurch & Poole ;
- Villages (Tier 3) – settlements with Local Plan Development Boundaries or villages excluded from (inset within) the Green Belt ; and
- Villages (Tier 4) – settlements without Local Plan Development Boundaries or villages included within (washed over by) the Green Belt.

Is the distribution of housing between and within the functional areas appropriate?

The Council's strategic policies should ensure the availability of a sufficient supply of deliverable and developable land to deliver the County's housing requirement. This sufficiency of HLS should meet the housing requirement, ensure the maintenance of 5 Years Housing Land Supply (YHLS) and achieve HDT performance measurements.

Housing growth allocations are distributed between the four functional areas as follows :-

- South Eastern Dorset - 7,544 dwellings ;
- Central Dorset - 11,202 dwellings ;
- Northern Dorset - 4,389 dwellings ; and
- Western Dorset - 1,469 dwellings.

Housing delivery is maximised, where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector. There should be a wide range of sites by both size and market locations, which provides access to suitable land for small local, medium and large housebuilding companies as well as providing opportunities for a wide range of different types of dwellings to meet the housing needs of all households. Under the 2019 NPPF, the Council should identify at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 68). For Dorset, 10% of the housing requirement is 3,048 dwellings. It is noted that a list of Small & Medium Sites is provided in Appendix 3 however the Council should confirm compliance with this aspect of national policy.

The 2019 NPPF sets out that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period and if appropriate to set out the anticipated rate of development for specific sites (para 73). There is no housing trajectory in the Draft Dorset Local Plan. The omission

of a detailed housing trajectory is inconsistent with the 2019 NPPF. A housing trajectory should be incorporated into the Local Plan.

The Council has provided 5YHLS based on housing requirements of adopted Local Plans. However, the Council has not provided a 5 YHLS Statement for the proposed housing requirement. If the Council cannot demonstrate a 5 YHLS on adoption of the Dorset Local Plan and maintain a 5 YHLS throughout the plan period, then the Local Plan should not be found sound.

Do you agree that there is a need to amend the Green Belt to enable development?

The HBF agree that there is a need to amend Green Belt boundaries. As set out in 2019 NPPF, where fully evidenced and justified Green Belt boundaries can be altered in "exceptional circumstances" through the preparation or updating of Local Plans (para 136 & 137). The Council propose to release land from the Green Belt at Corfe Mullen & Upton on the edge of the Bournemouth, Christchurch and Poole conurbation, at towns & other main settlements of Ferndown / West Parley, Wimborne / Colehill, Verwood, Wareham & West Moors and at the larger villages of Lytchett Matravers & Sturminster Marshall.

Neighbourhood Plans

Draft Policy DEV9 – Neighbourhood Plans

Do you have any comments on the approach to establishing housing targets for neighbourhood Plans?

The Local Plan sets the strategic context for neighbourhood planning. As set out in the 2019 NPPF, Neighbourhood Plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies (para 29). Proposed housing requirement figures for Designated Neighbourhood Plan areas are set out in Appendix 2 based on completions, extant planning permissions, adopted housing allocations; capacity on major sites (of 10 or more dwellings) within development boundaries as evidenced through the SHLAA and a windfall allowance on minor sites (of less than 10 dwellings) rather than a disaggregation of LHN.

Housing

Draft Policy HOU1 - Housing Mix

Do you agree that major residential development sites should provide at least 20% of the homes as accessible and adaptable homes to meet the needs of the elderly and less mobile?

If the Government implements proposed changes to Part M of the Building Regulations as set out in the "Raising Accessibility Standards for New Homes"

consultation, which closed on 1 December 2020, the Council's proposal for 20% M4(2) compliant homes under **Draft Policy HOU1** will be unnecessary.

If in the meantime, the Council wishes to adopt the optional standards for accessible & adaptable dwellings, then this should only be done in accordance with the 2019 NPPF (para 127f & Footnote 46) and the NPPG. Footnote 46 states "that planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing where this would address an identified need for such properties". As set out in the 2019 NPPF, all policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focus focussed tightly on supporting and justifying the policies concerned (para 31). Therefore, a policy requirement for M4(2) dwellings must be justified by credible and robust evidence. The NPPG sets out the evidence necessary to justify a policy requirement for optional standards. The Council should apply the criteria set out in the NPPG (ID 56-005-20150327 to 56-011-20150327).

The Council's policy requirements should not compromise the viability of development. Additional costs for M4(2) compliant dwellings should be included in the Council's updated viability assessment. The Government's consultation "Raising Accessibility Standards for New Homes" (ending on 1st December 2020) estimates the additional cost per new dwelling is approximately £1,400 for dwellings, which would not already meet M4(2).

Draft Policy HOU2 - Affordable housing (proposals to be refined through detailed viability testing)

Do you agree that affordable housing should be delivered by developments at different rates across Dorset?

On major sites and sites of 5 - 9 dwellings in Designated Rural Areas, residential development will contribute to the provision of affordable housing in the following proportions :-

- 40% of the total number of dwellings on sites in Zone 1 (The Isle of Purbeck (excluding Swanage), the Piddle and Cerne Valleys, Cranborne Chase and rural northern Dorset) ;
- 35% of the total number of dwellings on sites in Zone 2 (the remainder of Dorset outside Zone 1 & 3) ; and
- 25% of the total number of dwellings on sites in Zone 3 (Gillingham, Crossways, Wool, Weymouth Town Centre & on Portland).

The HBF agree that where there are identified viability challenges and the cumulative impact of proposed policy requirements threatens housing delivery, a differentiated policy approach to affordable housing provision across the County is justified.

Viability is a key issue in determining the soundness of the Local Plan at Examination. Without a robust approach to viability assessment, land will be

withheld from the market and housing delivery will be threatened, leading to an unsound Local Plan and housing delivery targets not being met. In plan-making, viability is inseparable from the deliverability of development. The viability of individual developments and plan policies should be tested at the plan making stage. As set out in the 2019 NPPF, the contributions expected from development including the level & types of affordable housing provision required and other infrastructure for education, health, transport, flood & water management, open space, digital communication, etc. should be set out in the Local Plan. Development should not be subject to such a scale of obligations that the deliverability of the Local Plan is threatened (para 34). Viability assessment should not be conducted on the margins of viability. This will be particularly important in the aftermath of uncertainties caused by the Covid-19 pandemic and Brexit. If the resultant Benchmark Land Value (BLV) is lower than the market value at which land will trade, then the delivery of housing targets will not be met.

Do you agree with the suggested tenure split?

The Council's proposed affordable housing tenure mix is a maximum of 30% (but not less than 10%) affordable home ownership products, a minimum of 30% social rent and a minimum of 40% affordable rent. This approach is inconsistent with national policy. The 2019 NPPF promotes affordable home ownership by requiring at least 10% of new dwellings built to be available for this tenure leaving only the remainder for other affordable housing tenures (para 64). The Government's Changes to the Current Planning System (ended on 1st October 2020) and The Government's consultation on Draft Revisions to the NPPF (ending on 27th March 2021) also propose further changes to delivering First Homes. The Council's affordable housing tenure mix should be amended.

Draft Policy HOUS4 - Specialist purpose built accommodation

Do you agree that specialist purpose built accommodation built as Extra Care should provide affordable housing?

The Council's updated viability assessment should test the impact of affordable housing provision on the viability of specialist purpose built accommodation. The Council's policy approach should not compromise the viability of development. The financial dynamics of older persons housing are different to general housing. Build costs are higher due to specific design criteria suited to the needs of older people, a greater gross to net floor area for non-saleable shared facilities, elongated construction / sales periods and cashflows as no individual units can be occupied until communal areas are completed, which means substantial upfront investment before any return on capital is received.

Draft Policy HOU6 – Self-build and Custom-build housing

Do you think the council should identify sites for self / custom build housing?

The Council should identify sites for self and custom build housing.

Community Infrastructure

Draft Policy COM9 - Provision of infrastructure for electric and other low emission vehicles

Do you agree with this proposal?

Residential developments will be expected to include infrastructure suitable for charging electric or other ultra-low emission vehicles according to the following standards :-

- for all residential development with communal off-street parking provision, at least 20% of car spaces will be expected to include active charging facilities and passive provision for all remaining spaces with the layout of the car park ensuring that all spaces can be activated as demand increases ;
- for minor residential development (all developments of less than 10 dwellings), passive infrastructure provision for each dwelling ;
- for major residential development (all developments of 10 dwellings or more), at least 20% of dwellings will be expected to have active charging facilities and the remaining 80% of dwellings will be expected to have passive provision ;
- at least one rapid charging point clustered with a fast charging point for every 10 car spaces provided or in accordance with local published guidance and where appropriate, the provision of an electric or ultra-low emission car club with its own dedicated spaces including active charging facilities.

The HBF recognise that electric vehicles will be part of the solution to transitioning to a low carbon future. The Department of Transport consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings (ended on 7th October 2019) set out the Government's preferred option to introduce a new requirement for EVCPs under Part S of the Building Regulations. The inclusion of EVCP requirements within the Building Regulations 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. It is proposed that charging points must be at least Mode 3 or equivalent with a minimum power rating output of 7kW fitted with a universal socket to charge all types of electric vehicle currently on the market. It is the HBF's opinion that the Council's policy approach is unnecessary because of the Government's proposals to change Building Regulations.

However, if **Draft Policy COM9** is retained, the HBF consider that the physical installation of active EVCPs is unnecessary. The evolution of automotive technology is moving quickly therefore a passive cable and duct approach is a

more sensible and future proofed solution, which negates the potential for obsolete technology being experienced by householders. A passive cable and duct approach means that the householder can later arrange and install a physical EVCP suitable for their vehicle and in line with the latest technologies.

The supply from the power grid is already constrained in many areas across the country. The HBF and its Members have serious concerns about the capacity of the existing electrical network in the UK. Major network reinforcement will be required across the power network to facilitate the introduction of EVCPs and the move from gas to electric heating as proposed under the Future Homes Standard. These costs can be substantial and can drastically affect the viability of developments. If developers are funding the potential future reinforcement of the National Grid network at significant cost, this will have a significant impact on their businesses and potentially jeopardise future housing delivery. The Council's policy approach should not compromise the viability of development. The Department for Transport - Electric Vehicle Charging in Residential & Non-Residential Buildings consultation estimated an installation cost of approximately £976 per EVCP plus any costs for upgrading local electricity networks, which under the Government's proposal automatically levies a capped figure of £3,600 on developers. These additional costs should be included in the Council's updated viability assessment.

Draft Policy COM12 - The provision of utilities service infrastructure

Do you agree with this proposal?

Under **Bullet Point (iv)** all new residential should provide the infrastructure required to enable connectivity to the high-speed electronic communications network unless it is not practical to do so. For major developments (10+ dwellings or sites of greater than 0.5 hectares) this should be through direct fibre to the premise (FTTP) access.

It is the HBF's opinion that the Council should not impose new electronic communications requirements beyond the provision of infrastructure as set out in statutory Building Regulations. In the Budget (11th March 2020), the Government confirmed future legislation to ensure that new build homes are built with gigabit-capable broadband. The Government will amend Part R "Physical Infrastructure for High-Speed Electronic Communications Networks" of the Building Regulations to place obligations on housing developers to work with network operators to install gigabit broadband, where this can be done within a commercial cost cap. The Department for Culture, Media and Sport (DCMS) has outlined its intentions on the practical workings of this policy, which will apply to all to new builds. Any type of technology may be used, which is able to provide speeds of over 1000 Mbps. All new build developments will be equipped with the physical infrastructure to support gigabit-capable connections from more than one network operator.

The Environment and Climate change

What else could the local plan do to mitigate climate change and help people adapt to its effects?

Draft Policy ENV3 – Biodiversity and Net Gain

Do you agree with the suggested approach and what it is trying to achieve?

It is the HBF's opinion that the Council should not be setting biodiversity gains greater than 10% or deviating from Government proposals set out in the Environment Bill including transitional arrangements.

This legislation will require development to achieve a 10% gain for biodiversity. It is the Government's opinion that 10% strikes the right balance between the ambition for development and reversing environmental decline. 10% gain provides certainty in achieving environmental outcomes, deliverability of development and costs for developers. 10% will be a mandatory national requirement, but it is not a cap on the aspirations of developers who want to voluntarily go further. The Government will use the DEFRA Biodiversity Metric to measure changes to biodiversity under net gain requirements established in the Environment Bill. The mandatory requirement offers developers a level playing field nationally and reduced risks of unexpected costs and delays. The Council should not specify a requirement above 10%, the prefix "minimum" in **Bullet Point (ii)** should be deleted.

The Government will make provision in the Environment Bill to set a transition period of two years. The Government will work with stakeholders on the specifics of this transition period, including accounting for sites with outline planning permission, and will provide clear and timely guidance on understanding what will be required and when.

The Council's policy approach should not compromise the viability of development. The Government is committed to continued engagement with the housebuilding industry to address concerns and risks. The Government has confirmed that more work needs to be undertaken to address viability concerns raised by the housebuilding industry in order that net gain does not prevent, delay or reduce housing delivery. There are significant additional costs associated with biodiversity gain. The DEFRA Biodiversity Net Gain & Local Nature Recovery Strategies : Impact Assessment Table 14 : Net Gain Delivery Costs (Residential) sets out regional costs (based on 2017 prices) in South West of £18,470 per hectare of development based on a central estimate but there are significant increases in costs to £63,610 per hectare for off-site delivery under Scenario C. There may also be an impact on gross / net site acreage ratio, which is not considered.

Draft Policy ENV9 – High levels of environmental performance

Do you agree with the suggested approach and what it is trying to achieve?

The Council's policy approach is commendable however it is important that the Council's proposals do not conflict or go beyond the Government's proposals for Building Regulations. It is the HBF's opinion that the Council should not be setting different targets or policies outside of Building Regulations. As set out in the Future Homes Standard consultation (ended on 7th February 2020), the UK has set in law a target to bring all its greenhouse gas emission to net zero by 2050. The Government intends to future proof new homes with low carbon heating and world-leading levels of energy efficiency by uplifting standards for Part L (Conservation of Fuel & Power) and changing Part F (Ventilation) of the Building Regulations.

Today's new homes are very energy efficient with lower heating bills for residents in comparison to older existing homes. Energy performance data has shown that around 8 out of 10 new build dwelling have an A or B energy efficiency rating, compared to just 3% of existing properties. An HBF report published in November 2019 found that, as a result, the average new build buyer in England and Wales saves £442.32 every year on heating costs compared to owners of existing dwellings.

The HBF recognise and support the need to move to The Future Homes Standard but there are difficulties and risks to housing delivery given the immaturity of the supply chain for the production / installation of heat pumps and the additional load that would be placed on local electricity networks in combination with Government proposals for the installation of electric vehicle charging points (EVCP) in new homes.

The Government Response to The Future Homes Standard : 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings dated January 2021 provides an implementation roadmap, the Government's aim is for the interim Part L (Conservation of fuel and power), Part F (Ventilation) and Overheating Regulations to be regulated for in late 2021 and to come into effect in 2022. The 2021 interim uplift will deliver homes that are expected to produce 31% less CO₂ emissions compared to current standards. To ensure as many homes as possible are built in line with new energy efficiency standards, transitional arrangements will apply to individual homes rather than an entire development and the transitional period will be one year. This approach will support successful implementation of the 2021 interim uplift and the wider implementation timeline for the Future Homes Standard from 2025.

The Future Homes Standard will ensure that new homes will produce at least 75% lower CO₂ emissions than one built to current energy efficiency requirements. By delivering carbon reductions through the fabric and building services in a home rather than relying on wider carbon offsetting, the Future Homes Standard will ensure new homes have a smaller carbon footprint than any previous Government policy. In addition, this footprint will continue to reduce over time as the electricity grid decarbonises.

The HBF support moving towards greater energy efficiency via a nationally consistent set of standards and a timetable, which is universally understood and technically implementable. The Government Response to The Future Homes Standard consultation confirms that the Planning and Energy Act 2008 will not be amended, which means that the Council will retain powers to set local energy efficiency standards for new homes. The HBF acknowledges that the Council may stipulate energy performance standards that exceed the Building Regulations but consider that the Council should comply with the Government's intention of setting standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of individual Council's specifying their own policy approach to energy efficiency, which would undermine economies of scale for product manufacturers, suppliers and developers. As set out in the Government's Planning for the Future White Paper a simpler planning process improves certainty. The higher levels of energy efficiency standards for new homes proposed in the 2021 Part L uplift and Future Homes Standard means that the Council should not need to set local energy efficiency standards in order to achieve the shared net zero goal.

The Council's policy approach should not compromise the viability of development. The Council's updated viability assessment should include additional costs for 2021 Part L uplift. The Government's estimated cost is £4,847 per dwelling.

Conclusion

It is hoped that these responses are of assistance to the Council in preparing the next stages of its Local Plan. For the Dorset Local Plan to be found sound under the four tests of soundness as defined by the 2019 NPPF, the Local Plan should be positively prepared, justified, effective and consistent with national policy (para 35). As the preparation of the Dorset Local Plan progresses, the HBF look forward to submitting further representations during later consultation stages, in the meantime, if any further information or assistance is required please contact the undersigned.

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



Susan E Green MRTTP
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