

Calderdale Council
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SENT BY EMAIL
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22/04/2021

Dear Sir / Madam,

CALDERDALE LOCAL PLAN: ADDITIONAL EVIDENCE

1. Thank you for consulting with the Home Builders Federation (HBF) on the Additional Evidence produced as part of the Calderdale Local Plan.
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.

Electric Vehicle Charging Points

3. The Council are proposing a Policy in relation to Electric Vehicle Charging Points. Currently, Policy IM4 states that *'Electric car charging point should be provided and actively pursued in all new major developments. New Homes should have provision of electric vehicle charging points provided at their parking spaces.'* The proposed policy looks for all new homes to provide an active electric charging point where parking is provided within the dwelling curtilage or in an allocated space. It goes on to state that where parking is provided in communal areas, at least 10% should have active charge points within a minimum of one charge point where there are fewer than 10 spaces.
4. 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. The Department for Transport held (ended on 7th October 2019) a consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings, this consultation set out the Government's preferred option to introduce a new functional requirement under Schedule 1 to the Building Regulations 2010. The inclusion of EVCP requirements within the Building Regulations 2010 will introduce a standardised consistent approach to EVCP 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. It is proposed that EVCPs must be at least Mode 3 or equivalent with a minimum power rating output of 7kW (expected increases in battery sizes and technology developments may make charge points less than 7kW obsolete for future car models, 7kW is



considered a sufficiently future-proofed standard for home charging) fitted with a universal socket to charge all types of electric vehicle currently on the market and meet relevant safety requirements. All charge points installed under the Building Regulations should be un-tethered and the location must comply with the Equality Act 2010 and the accessibility requirements set out in the Building Regulations Part M. The Government has estimated installation of such charging points add on an additional cost of approximately £976.

5. The Government has also recognised the possible impact on housing supply, where the requirements are not technically feasible. The Government's consultation proposed introducing exemptions for such developments. The costs of installing the cables and the charge point hardware will vary considerably based on site-specific conditions in relation to the local grid. The introduction of EVCPs in new buildings will impact on the electricity demand from these buildings especially for multi-dwelling buildings. A requirement for large numbers of EVCPs will require a larger connection to the development and will introduce a power supply requirement, which may otherwise not be needed. The level of upgrade needed is dependent on the capacity available in the local network resulting in additional costs in relation to charge point instalment. 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. 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.
6. Therefore, the HBF considers that this policy should be deleted as it will be unnecessary and a repetition of building regulations. However, if the policy is to be retained, the HBF considers that the Council will need to consider the viability of the policy and consider potential exemptions to the requirement.

Housing Trajectory Update (March 2021)

7. Table 2 of the Paper provides an update to 31st March 2020 and sets out the housing requirement and the supply. It identifies a housing requirement of 14,950 dwellings and a potential supply of 14,692 dwellings. The supply includes 905 completions, 2,284 extant permissions, 984 windfalls and 50 dwellings from the Brownfield Register, along with 10,469 dwellings on sites allocated in the Plan.
8. The Council have then gone on to consider the potential options for the housing requirement as part of the Housing Trajectory. They have looked at a number of potential stepping options for the housing requirement. The HBF is concerned by these options, as this means a potential delay to the delivery of homes and to the provision of homes to households that are in need of a home.
9. The Council then go on to consider the five-year housing land supply. Table 5 of the Update sets out the five-year supply using each of the stepping options. It identifies that the Council has issues with supply and that with a number of the housing requirement options it will not have a five-year housing land supply, or will have a very marginal five

year supply. The HBF is concerned that the Council are looking at different ways of moving the housing requirement around to address this issue, rather than actually addressing the issues with supply. The HBF considers that the most appropriate way to address these issues and to ensure that there is a five-year housing land supply at the time of adoption would be for the Council to ensure that it has identified an appropriate range and supply of housing sites and allocations.

Future Engagement

10. 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.
11. 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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