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SENT BY EMAIL
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Dear Planning Policy Team,

EDEN LOCAL PLAN: PARTIAL REVIEW SCOPING CONSULTATION

1. Thank you for consulting with the Home Builders Federation (HBF) on the Eden Local Plan 2014-2032 Partial Review Climate Change and Design Regulation 18 Scoping consultation.
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. The HBF notes that the Council are keen to complete the partial review in a short timescale and that it will focus on climate change and design matters, and that it will not be revisiting the spatial strategy, or the housing and employment allocations or numbers. The Council are looking at the potential introduction of two new policies support by a design Supplementary Planning Document (SPD).

Section 3: Climate Change Priorities

Question 17: What actions are most important to you in tackling climate change and biodiversity loss? Please score each item on a scale of 1 to 5, with 1 being least important and 5 being most important.

- i. Sustainable energy sources and efficiency in buildings (4)
 - ii. Flood risk and surface water management (4)
 - iii. Protection and enhancement of biodiversity (4)
 - iv. Sustainable transport and infrastructure (4)
4. The HBF considers that all of these actions are important and should be a consideration for development, the construction of new homes creates unique opportunities to protect and enhance our environment in a multitude of exciting ways. The HBF considers that one of the main challenges will be to provide an appropriate balance between protecting the environment, addressing climate change, preventing biodiversity loss and ensuring sufficient homes are delivered. This will mean ensuring that any policies implemented locally are viable and achievable.
5. The Council should note that today's new homes are very energy efficient with lower heating bills for residents compared to existing older homes. The HBF supports moving towards greater energy efficiency via a nationally consistent set of standards and a



timetable for achieving any enhancements, which is universally understood and technically implementable. The HBF considers that the Council should work with the homebuilding industry closely to ensure that any changes to the Plan are both realistic and viable, and that as far as possible they do not overlap with changes being made at a national level.

Question 18: What three things would you like to see happening as part of new developments that, in your opinion, would contribute towards mitigating against climate change and help towards a zero-carbon future?

6. There are numerous considerations that may need to be factored that could contribute to mitigating against climate change and help towards a zero-carbon future including; reducing greenhouse gases; water issues; the impact of new homes on bio-diversity and nature; what resources are used and waste is produced; air quality; flood and climate resistance; the wider effect housing has on its social and built environment. However, these policies may also require input and collaboration from a broad range of stakeholders, which will also need to be given consideration. Technologies will need to be developed and proved and then mainstreamed – not least with regards to post gas heating solutions; whilst consumers will need to be consulted with and educated as new technologies emerge. Supply chains will need to be created; new skills and training developed for production and maintenance of new technologies, and person capacity built. The Council will need to ensure that the any policies introduced are deliverable and viable and have the support of all of the industries and sectors involved.
7. The Council should note that a new cross sector Future Homes Task Force has announced that a multi-million-pound Delivery Hub will be set up to manage the home building industry's drive to meet the environmental targets set out by Government. The Task Force comprises of representatives from across all the sectors that shape new homes including government, house building, utility provision, material suppliers and environmental groups.

Section 4: Design priorities

Question 25: How would you score the following design elements in new development for their contribution to well-designed or beautiful places? Please score each item on a scale of 1 to 5, with 1 being least important and 5 being most important.

- i. Designs that are restricted to a traditional local style (1)
 - ii. Designs that are sympathetic to traditional styles but innovative (3)
 - iii. Use of appropriate materials sympathetic to local traditional character (3)
 - iv. Integrated open spaces and landscaping (3)
 - v. Parking, servicing and bin storage areas that do not dominate the street scene (3)
 - vi. Street design that helps you feel safe (4)
 - vii. Accessible and dementia friendly places (3)
8. The HBF considers that key to good design is that a development is fit for purpose and durable, we consider that a well-designed place is unlikely to be achieved by focusing only on the appearance, materials and detailing of buildings. It comes about through making appropriate choices at many levels, including consideration of the site layout; the

form and scale of buildings; appearance; landscape; materials; detailing, local character, site characteristics and topography, local aspiration, market demand and site viability.

Question 26: Should policies relating to new residential developments adopt the national minimum internal space standards?

9. The nationally described space standards (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.
10. PPG¹ 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'.*
11. The Council will need robust justifiable evidence to introduce the NDSS, 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.

Future Engagement

12. 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.
13. 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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