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SENT BY EMAIL
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Dear Planning Policy Team,

MIDDLESBROUGH LOCAL PLAN: DRAFT LOCAL PLAN

1. Thank you for consulting with the Home Builders Federation (HBF) on the Middlesbrough Draft Local Plan 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 would like to submit the following comments upon selected policies contained in this consultation. These responses are provided in order to assist Middlesbrough Council in the preparation of the emerging local plan.
4. Whilst not a matter of soundness it would be helpful if the council could include clause / paragraph numbers within all of the policies. The numbering of each clause / paragraph within a policy will aid referencing for those making representations on the local plan as well as for applicants and decision makers following the adoption of the plan.

Plan Period

5. The new Local Plan will cover the period 2022 to 2041. The NPPF¹ states strategic policies should look ahead over a minimum 15-year period from adoption and that where larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take in account the likely timescale for delivery. The HBF would expect 2041 to provide a 15-year period from adoption, however, the Council may want to keep this under review and to consider if a longer period is required in relation to larger scale developments proposed in the Plan.

Vision and Objectives

6. Objective D is to build high quality homes that help strengthen our communities. Whilst the vision includes a paragraph in relation to providing a range of high quality homes.

¹ NPPF 2023 Paragraph 22



The HBF generally supports the Council in identifying the need for high quality homes as part of their vision and objectives.

Policy ST1 Development Strategy

7. This policy states that the Council will put place-making at the heart of its planning decisions to deliver a wide range of housing to support the needs and aspirations of residents, with a focus on urban living. It also looks to deliver sustained, positive economic growth to realise an additional 350 jobs per annum for the Plan period.
8. The HBF considers that whilst the aspirations of this policy are generally laudable, the policy is more of a statement of intent than a policy that will guide development, and repeats elements that are contained within other policies. Therefore, the HBF does not consider that the policy is in line with the NPPF² which looks for policies to contain policies where it is evident how a decision maker should react to development proposals and to serve a clear purpose avoiding unnecessary duplication.

Policy ST2 Middlesbrough Development Corporation Area

9. This policy states that the Middlesbrough Development Corporation (MDC) Masterplan aims to achieve the following objectives: 1,500 new homes and 4,000 new jobs. It goes on to identify the sites that are identified for housing: Middlehaven (500 dwellings); Gresham / Union Village (211 dwellings); Station Street (140 dwellings); and Church House (86 dwellings), however, it also states that additional housing will be brought forward throughout the plan period on unallocated windfall sites to deliver the remaining balance of dwellings (563).
10. 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, planned to an appropriate strategy and does not create an over reliance on one location or type of property. 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 windfall that they have an appropriate evidence base to support this, this would be in line with the NPPF³ which states that where an allowance is made for windfall sites there should be compelling evidence that they will provide a reliable source of supply.

Policy CR1 Creating Quality Places

11. This policy states that all development proposals will be required to achieve well design building and places having regard to adapting to and minimising the likely impacts of climate change, by seeking to achieve zero carbon buildings and providing renewable and low carbon energy generation.
12. The HBF generally supports the delivery of well-designed buildings and places and considers that the homebuilding industry can help to address some of the climate change challenges identified by the Council. However, the HBF recognises the need to

² NPPF Dec 2023 paragraph 16

³ NPPF 2023 paragraph 72

move towards greater energy efficiency via a nationally consistent set of standards and timetable, which is universally understood and technically implementable.

13. Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations were updated in 2021 and took effect from 15th June 2022. 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 provided an implementation roadmap. The 2021 Building Regulations interim uplift will deliver homes that are expected to produce 31% less CO₂ emissions compared to current standards. The implementation of the Future Homes Standard 2025 will ensure that new homes will produce at least 75% lower CO₂ emissions than one built to previous 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.
14. The HBF considers that the Council should ensure that this policy is only implemented in line with the December 2023 Written Ministerial Statement⁴ which states that ‘a further change to energy efficiency building regulations is planned for 2025 meaning that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continue to decarbonise. Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes’. It goes on to state that ‘the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale’. The HBF considers as such it would be appropriate to make reference to the Future Homes Standard and the Building Regulations as the appropriate standards for development.
15. The Council will also be aware that the Future Homes and Buildings Standards: 2023 consultation⁵ has been released covering Part L (conservation of fuel and power), Part F (ventilation) and Part O (overheating).
16. Policy CR2 General Development Principles
17. This policy states that when assessing the suitability of development, all proposals will be required to accord with the policies, allocations and designations in the Local Plan. The HBF does not consider that the requirement to accord with the policies of the Plan is

⁴ <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hcws123>

⁵ <https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation/the-future-homes-and-buildings-standards-2023-consultation>

necessary and it does not need to be stated within this policy. The HBF considers that it could be considered contrary to planning law which requires that applications be determined in accordance with the development plan unless material considerations indicate otherwise.

18. The policy also goes on to state that all proposals will be required to incorporate energy efficiency measures into the fabric of the building. As set out in response to Policy CR1 the HBF considers that the Council should only be seeking to require proposals to incorporate energy efficiency measures in line with national policy and building regulations.

Policy CR4 Developer Contributions

19. This policy looks for developer contributions to be secured in order to fund necessary infrastructure and other community benefits required as a consequence of development.
20. Development can only be required to mitigate its own impact and cannot be required to address existing deficiencies in infrastructure or services. It is therefore essential for the Infrastructure Development Plan (IDP) to clearly show the existing and known deficiencies in the current infrastructure, before reaching any conclusion on the cumulative effects of new development, and any contribution that is needed from new development to mitigate any additional individual and/or cumulative impacts.
21. The HBF also suggests that the policy wording should include the opportunity for negotiation around policy requirements for site specific reasons, to reflect viability challenges identified in the Viability Assessment and as any sites whose circumstances fall outside the parameters of the typologies tested may already be unviable under the proposed Local Plan policies.

Policy CR5 Development Limits

22. This policy states that within development limits, development will generally be acceptable where it accords with the policies in the Local Plan. It then sets out the restricted list of developments that may be acceptable beyond development limits.
23. The HBF recommends that the Council differentiates in terms of its land beyond development limits, for example there is a significant difference between land adjacent to settlements and settlement boundaries which may be sustainable and appropriate for development, sustainable development in rural areas where it will enhance or maintain the vitality of rural communities and sites which are located in isolated areas.

Policy HO1 Housing Strategy

24. This policy sets out how new housing development can contribute to the creation of balanced and sustainable communities. It includes maximising and prioritising the re-use of previously developed land, supporting housing-based regeneration schemes, providing a range of modern, high quality affordable housing, providing a balanced portfolio of housing and minimising further development of new housing in greenfield suburban locations.

25. The HBF considers that this policy is more of a statement of intent than a policy, and that many of the elements of the policy are repeated within other policies in the Plan.
26. The HBF considers that whilst it is appropriate to support and maximise the use of previously developed sites and sites in and around the town centre this needs to be done in the right way and should not prevent the delivery of other sustainable sites or sustainable developments. The Council will need to be able to demonstrate with evidence that this strategy is deliverable and developable over the Plan period, will meet the varied housing need and will not lead to a shortage of homes being delivered.

Policy HO2 Housing Requirement

27. This policy looks for the Local Plan to deliver a minimum of 7,600 net additional dwellings in Middlesbrough between 2022 and 2041, with a five-year supply of deliverable housing maintained throughout the plan period. The policy also sets out the housing requirements for the Neighbourhood Areas.
28. The Plan states that a minimum housing requirement of 400 net additional dwellings per annum (dpa) is proposed for Middlesbrough between 2022 and 2041, as informed by the Local Housing Needs Assessment (LHNA). The LHNA identified that the standard methodology identified a requirement for a minimum of 256dpa, however, it goes on to identify a need for 400dpa to support economic growth, although much of the evidence used to justify this is based on the SHMAs from 2016 and 2018. The Plan also suggests that net housing completions over the last 11 years have averaged 520dpa.
29. The NPPF⁶ states that to determine the minimum number of homes needed policies should be informed by a local housing need assessment conducted using the standard method. The PPG sets out the standard method for calculating the minimum annual local housing need (LHN) figure⁷. The standard method identifies a minimum annual local housing need figure for Middlesbrough of 253dpa. The PPG⁸ also sets out when it might be appropriate to plan for a higher housing need figure than the standard method, these include where there are growth strategies for the area, where there are strategic infrastructure improvements, where an authority is taking unmet need from a neighbouring authority, and where previous levels of housing delivery, or previous assessments of need are significantly greater than the outcome from the standard method.
30. The HBF generally supports the Council in utilising a figure over and above the LHN identified by the Standard Method. However, the HBF recommends that the Council may want to consider updating their evidence base to ensure that they have given full consideration to all of the elements that may suggest a higher housing figure is appropriate including the balance between economic development and housing, the previous housing delivery and the affordable housing need. The HBF considers that this may suggest that a higher housing requirement is appropriate.

⁶ NPPF Dec 2023 Paragraph 61

⁷ PPG ID:2a-004-20201216

⁸ PPG ID: 2a-010-20201216

31. Table A provides a summary of the sources of housing supply. It suggests that the housing supply could potentially deliver 8,488 dwellings, through housing allocations, sites with planning permission, development in the MDC area and small site windfalls. When considering the level of housing land supply to meet the housing requirement the HBF recommends that the Council ensure that they give consideration to an appropriate level of flexibility within the supply to ensure that the Plan is robust and resilient to change.

Policy HO3 Housing Mix and Type

32. This policy states that all residential development will be required to achieve the Space Standards in Policy HO7. It also states that residential development of 10 or more dwellings will be expected to provide a range of dwellings types, tenures and sizes that reflect identified housing needs; include affordable housing where required by Policy HO5, and provide at least 10% of the dwellings as bungalows.
33. The HBF has concerns about the requirement for 10% of the dwellings to be provided as bungalows and the evidence for this need, and the potential impact it will have on site viability and deliverability.
34. The policy also looks for at least 10% of the total number of dwellings to be M4(2) accessible and adaptable and for residential developments of 100 or more dwellings to provide at least 2% of dwellings to achieve M4(3) wheelchair adaptable dwellings.
35. 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.
36. PPG⁹ 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 Middlesbrough which justifies the inclusion of optional higher standards for accessible and adaptable homes in its Local Plan policy. If the Council can provide the appropriate evidence and this policy is to be included, then the HBF recommends that an appropriate transition period is included within the policy.
37. The PPG also identifies other requirements for the policy including the need to consider site specific factors such as vulnerability to flooding, site topography and other circumstances, this is not just in relation to the ability to provide step-free access.

⁹ PPG ID: 56-007-20150327

38. The Council should also note that the Government response to the Raising accessibility standards for new homes¹⁰ states that the Government proposes to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations. M4(3) would continue to apply as now where there is a local planning policy in place and where a need has been identified and evidenced.
39. The HBF considers that if the Council has the evidence to introduce this policy, it may want to consider the most appropriate way to deliver the homes they require to meet their needs. The HBF considers that this may not always be in the form of M4(3) homes, and may need further consideration.
40. Additionally, the policy also looks for residential developments of 200 or more dwellings to make at least 1% of the dwellings available as self-build or custom build plots.
41. The HBF would be keen to understand the evidence to support the need for custom and self-build housing in Middlesbrough, and how it has informed the requirements of Policy HO3 and HO11. The PPG¹¹ sets out how custom and self-build housing needs can be assessed. The LHNA (2021) suggests that the Council's Self & Custom Build Register currently only has 1 active registration.
42. The HBF does not consider that the Council has appropriate evidence to support the requirement for developers on sites of 200 dwellings or more to provide 1% of all new homes as service plots for custom or self-build housing. The HBF is concerned that as currently proposed this policy will not assist in boosting the supply of housing and may even limit the deliverability of some sites and homes. The HBF considers that the Council's own evidence show that there is not a demand from custom and self-builders.
43. The PPG¹² sets out how local authorities can increase the number of planning permissions which are suitable for self and custom build housing. These include supporting neighbourhood planning groups to include sites in their plans, effective joint working, using Council owned land and working with Home England. The HBF considers that alternative policy mechanisms could be used to ensure a reliable and sufficient provision of self & custom build opportunities across the Borough including allocation of small and medium scale sites specifically for self & custom build housing and permitting self & custom build outside but adjacent to settlement boundaries on sustainable sites especially if the proposal would round off the developed form.
44. The policy also states that dwelling types to meet the needs of older people will be encouraged on all suitable development sites. The HBF is generally supportive of providing homes that are suitable to meet the needs of older people and disabled people. Whilst there is general support for such development, the HBF would

¹⁰ <https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes/outcome/raising-accessibility-standards-for-new-homes-summary-of-consultation-responses-and-government-response#government-response>

¹¹ PPG ID: 67-003-20190722

¹² PPG ID: 57-025-20210508

recommend that the Council should be more proactive in working with providers of this type of development to identify appropriate sites for allocation. This approach would provide far more certainty to the council that the need for such accommodation will be met in full. The HBF considers that the Council should note the difference between homes suitable for older people and specialist housing for older people, and the difference in need and demand for these types of homes.

Policy HO4 Housing Allocations

45. The HBF has no comments on the proposed housing allocations in Policy HO4 and these representations are submitted without prejudice to any comments made by other parties. 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 issues of housing delivery and would be keen to work proactively with the Council on this issue.
46. The Plan's policies should ensure the availability of a sufficient supply of deliverable and developable land to deliver Middlesbrough's housing requirement. This sufficiency of housing land supply (HLS) should meet the housing requirement, ensure the maintenance of a 5 Year Housing Land Supply (YHLS), and achieve Housing Delivery Test (HDT) performance measurements. 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 and to provide flexibility and choice within the market. Such an approach would be consistent with the NPPF requirements for the plan to be positively prepared and flexible.
47. The Council's overall HLS should include a short and long-term supply of sites by the identification of both strategic and non-strategic allocations for residential development. Housing delivery is optimised where a wide mix of sites is provided, therefore strategic sites should be complimented by smaller non-strategic sites. The widest possible range of sites by both size and market location are required so that small, medium and large housebuilding companies have access to suitable land to offer the widest possible range of products. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. Housing delivery is maximised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice / competition in the land market.
48. 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 in line with the NPPF requirements.

Policy HO5 Affordable Housing

49. This policy states that on residential developments of 10 or more homes, within the wards of Acklam, Coulby Newham, Hemlington, Kader, Ladgate, Marton East, Marton West, Nunthorpe, Stainton & Thornton, and Trimdon, a minimum of 15% of the homes will be required to be affordable. It goes on to state that of the affordable homes 25% should be First Homes, and that in addition a minimum of 10% of the total number of homes shall be provided as affordable homeownership.
50. The HBF supports the need to address the affordable housing requirements of the borough. The NPPF¹³ is, however, clear that the derivation of affordable housing policies must not only take account of need but also viability and deliverability. The Council should be mindful that it is unrealistic to negotiate every site on a one-by-one basis because the base-line aspiration of a policy or combination of policies is set too high as this will jeopardise future housing delivery.
51. The HBF is concerned about the clarity of this policy, particularly in relation to the ‘**in addition**, a minimum of 10% of the total number of homes’. The HBF considers that the Council need to be clear whether this is addition to the affordable homes, or in addition to the First Homes. The NPPF¹⁴ is clear that where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership.

Policy HO7 Space Standards for Residential Uses

52. This policy states that all new residential development will be required to ensure that the internal layout and size are suitable to serve the amenity requirements of future occupiers and will be expected to comply with the Nationally Described Space Standards (NDSS).
53. 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. PPG¹⁵ 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, Viability and Timing. 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.

Policy HO11 Self-build and Custom Build Housing

54. This policy states that on sites of 200 dwellings or more at least 1% of the housing plots should be made available as self-build or custom-build plots.
55. The HBF has set out its concerns in relation to this requirement in Policy HO3, and as such has not repeated them here. However, it seems unnecessary for both policies to

¹³ NPPF Dec 2023 Paragraph 34

¹⁴ NPPF Dec 2023 Paragraph 66

¹⁵ PPG ID:56-020-20150327

contain this requirement, and the HBF would suggest that the requirement could be removed from HO3, to avoid unnecessary duplication.

Policy GR6 Nutrient Neutrality Water Quality Effects

56. This policy states that proposals for developments that will result in additional overnight accommodation, or would otherwise increase the discharge of nitrates into the River Tees, will be required to achieve Nutrient Neutrality. Any mitigation for Nutrient Neutrality must be provided 'in perpetuity'.
57. The Notice of Designation of Sensitive Catchment Areas 2024¹⁶ identifies the Teesmouth and Cleveland Coast SPA / Ramsar as a nitrogen sensitive catchment area. The notice identifies that *'in designated catchments water companies have a duty to ensure wastewater treatment works serving a population equivalent over 2,000 meet specified nutrient removal standards by 1st April 2030. Competent authorities (including local planning authorities) considering planning proposals for development draining via a sewer to a wastewater treatment works subject to the upgrade duty are required to consider that the nutrient pollution standard will be met by the upgrade date for the purposes of Habitats Regulations Assessments. A limited exemption process will be completed by 1 April 2024, when wastewater treatment works exemptions will be confirmed, which may affect the levels of nutrient mitigation that development must secure for specific wastewater treatment works in some catchments. It is important that planning decisions continue to be taken based on material planning considerations'*. Therefore, the HBF considers that the need for mitigation in perpetuity is no longer appropriate.
58. The HBF would also suggest that the Council may want to further consider the role of the water industry in the protection of water resources and nutrient neutrality. This policy places a lot of emphasis on the development industry to protect water quality, to ensure water resources, to protect the environment and to create nutrient neutrality, whereas most of the actual responsibility for these elements will be reliant on the work of the water industry.
59. The Council may also want to update paragraph 6.27 of the justification text in light of the latest policy and guidance in relation to biodiversity net gain.

Policy IN6 Health and Wellbeing

60. This policy looks for all major developments to be supported by a Health Impact Assessment to demonstrate that full consideration has been given to health and wellbeing.
61. The HBF generally supports plans that set out how the Council will achieve improvements in health and well-being. In preparing its local plan the Council should normally consider the health impacts with regard to the level and location of development. Collectively the policies in the plan should ensure health benefits and limit

¹⁶ <https://www.gov.uk/government/publications/notice-of-designation-of-sensitive-catchment-areas-2024/notice-of-designation-of-sensitive-catchment-areas-2024#effect-of-this-notice>

any negative impacts and as such any development that is in accordance with that plan should already be contributing positively to the overall healthy objectives of that area.

62. The PPG¹⁷ sets out that HIAs are 'a useful tool to use where there are expected to be significant impacts' but it also outlines the importance of the local plan in considering the wider health issues in an area and ensuring policies respond to these. As such Local Plans should already have considered the impact of development on the health and well-being of their communities and set out policies to address any concerns. Consequently, where a development is in line with policies in the local plan a HIA should not be necessary. Only where there is a departure from the plan should the Council consider requiring a HIA. In addition, the HBF considers that any requirement for a HIA should be based on a proportionate level of detail in relation the scale and type of development proposed. The requirement for HIA for all major developments without any specific evidence that an individual scheme is likely to have a significant impact upon the health and wellbeing of the local population is not justified by reference to the PPG. Only if a significant adverse impact on health and wellbeing is identified should a HIA be required, which sets out measures to substantially mitigate the impact.

Policy IN7 Digital and Communications Infrastructure

63. This policy states that new residential developments should be served by a high speed broadband connection. This will need to be directly accessed from the nearest exchange and threaded through resistant ducting to enable easy access to the cable for future repair, replacement and upgrading.
64. The HBF considers that a policy that would generally encourage and support the provision of digital connectivity could be appropriate, however, any requirements on developers should not go beyond the provision of infrastructure as set out in the statutory Building Regulations. The HBF considers that the Council should work closely with the providers of digital infrastructure, to ensure that appropriate provision is provided, and that the onus is placed on those who can actually provide the appropriate infrastructure. The HBF does not consider that it is necessary to provide a policy to incentivise the development industry, the industry is already well aware of the benefits of infrastructure and the requirements of those looking to purchase a new homes and can self-police the cost/benefit of this provision with regards to site viability.

Monitoring

65. Appendix 1 provides the monitoring framework it provides indicators, a target, the existing baseline and the source of the data.
66. The HBF supports the Council in including a monitoring framework which sets out the monitoring indicators along with the relevant policies, the data source and where they will be reported, and the targets that the Plan is hoping to achieve, the HBF considers that it would also be useful to include the actions to be taken if the targets are not met. The HBF recommends that the Council provide more details as to how the plan will

¹⁷ PPG ID:53-005-20190722

actually be monitored, and identifies when, why and how actions will be taken to address any issues identified.

Viability

67. The HBF has not been able to find a more up to date Viability Assessment than the 2018 document. The HBF considers that this will need to be updated to reflect the current Plan policies and requirements and the current costs.

Future Engagement

68. 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.

69. 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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