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18/03/2025

Dear Sir/ Madam

### **Chelmsford Local Plan**

1. Thank you for consulting the Home Builders Federation (HBF) on the Chelmsford Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

### **Duty to Co-operate**

2. The Council have published Statements of Common Ground (SoCG) with a number of neighbouring authorities. However, HBF note that there is no SoCG with Rochford, which borders the Council to the east, or with Castle Point Borough Council or Southend City Council which are part of the South Essex strategic partnership group of local planning authorities which adjoins Chelmsford. HBF would have expected to have seen direct evidence of engagement with these Councils as part of the process of preparing this local plan. In particular discussions should have been held with all the Local Planning Authorities across the South Essex area to understand whether any unmet needs will arise in the most physically constrained authorities of Castle Point and Southend, given the scale of their needs and strong possibility that they will not be able to meet housing needs in full. The Council must be able to show at the examination that such discussions have taken place, and the outcomes of these discussions were properly considered, in order to show that the Council has fulfilled its legal duty to co-operate.

## S6: Housing and Employment Requirements

Policy is unsound as it is not positively prepared.

3. The Council state within this policy that the housing requirement of 1,210 dwellings per annum (dpa) has been chosen in order to meet the transitional arrangements in paragraph 234a the National Planning Policy Framework that was published in December 2024 (NPPF24) and which states:

*“234. For the purpose of preparing local plans, the policies in this version of the Framework will apply from 12 March 2025 other than where one or more of the following apply:*

- a. the plan has reached Regulation 1982 (pre-submission stage) on or before 12 March 2025, and its draft housing requirement meets at least 80% of local housing need”*

4. HBF welcomes the decision by the Council to plan for significantly more homes than is required by the previous iteration of the Framework (NPPF23). However, given that the Council had time to consider the level of development required by the new Framework we are disappointed that further sites were not identified to be included in the local plan in order to meet the 1,454 dpa required by the new NPPF.
5. It is recognised that the transitional arrangements are there to allow plans in the later stages of plan making, such as Chelmsford, to progress without undue delay, but HBF are concerned that the decision to set the housing requirement at 80% of the new standard method also avoids planning for what is expected by NPPF24 and the level of housing growth the Government considers necessary to address housing needs in Chelmsford in the future.
6. Given the high cost of housing, with median houses prices are over 11 times median earning, there is clearly a need to increase housing supply beyond what is being proposed. In particular planning for this higher level of housing need will increase the supply of affordable housing in Chelmsford, which the Council considers to be 602 dpa. Given the severe cost of housing within Chelmsford the increased delivery of affordable housing from delivering 1,454 homes each year must be considered a clear benefit of meeting the level

of housing need the current Government consider necessary to address the housing crisis facing the country.

#### Housing supply.

7. Table 1 states that over the plan period the Council expect 23,326 homes to be built. HBF are concerned that the buffer between housing needs and supply is significantly reduced compared to previous iterations of this plan. The local plan consulted on at regulation 18 the surplus was 20% of the housing requirement, a decision the HBF supported and considered necessary for the soundness of the local plan. However, this has been reduced to just 1.4%, a surplus of just 336 homes. The reduction of this buffer is concerning. Having a reasonable buffer between needs and supply is particularly important for plans such as this where there is a reliance on strategic sites to deliver homes. HBF is supportive of the allocation of these large strategic sites and recognise that these are a key part of long term housing delivery, but it must be recognised that there is a greater risk that these sites will not come forward as expected and as such a reasonable buffer is necessary to ensure housing needs are delivered over the plan period.
8. Within Table 1 the Council state that windfall will account for around 2,373 homes between 2027 and 2041 – an average of around 170 dpa. This is a significant increase compared to the regulation 18 consultation which considered a windfall allowance of 100 dpa to be a robust figure. HBF note that this was considered a modest figure and the evidence in the windfall assessment 2024 shows that on average 220 dpa has been delivered in the past 10 years. However, we are concerned that a significant proportion of that windfall will have come forward through the changes to permitted development in 2013 allowing office to residential conversion and that over the plan this will not be sustained. The council will need to provide evidence that the higher rate of windfall can be sustained across the plan period. This is particularly important given that the increase in the windfall allowance is one of the reasons why the Council are able to meet housing needs at 80% of the new housing need assessment for Chelmsford.

### **S7: Spatial Strategy**

#### Policy is unsound as it is not effective or consistent with national policy

9. HBF does not comment on specific sites or the overarching spatial strategy other than to state that there must be clear evidence to show that sites that make up the proposed strategy are either deliverable or developable. Where sites for major residential development with an outline permission, a grant of permission in principle or has been identified on a brownfield register are included in the first five years of the plan HBF would suggest that a key part of the evidence is that there is willing housebuilder involved with the site. This will provide the necessary confidence to the inspector examining this plan that the development will commence within the next five years.
10. The Council will also need to explain why the viability assessment supporting the SHELAA (Part 5 of 9) makes different cost assumptions to those set out in 2023 viability assessment. The different costs HBF have identified are highlighted in our comments on DM2 and it will be necessary for the Council to provide a break down as to what costs are different between the studies and justification for those differences. This is important given that the flatted typologies that are more likely to be delivered on sites in central and urban Chelmsford, and are key to housing needs being met in full, were considered unviable or marginal in the 2023 study are shown to be viable or marginal in the Council's assessment in the SHELAA.

Small sites under one hectare

11. It is not clear whether the Council's spatial strategy will deliver at least 10% (2,229 homes) of its housing requirement on sites of less than one hectare in size, as required by paragraph 70 of the NPPF23. Based on the trajectory provided in Appendix C it would seem that 1,609 homes will be delivered on small sites – some 690 homes short of what is required.
12. The HBF has undertaken extensive consultation with its small developer members. One of the chief obstacles for small developers is that funding is extremely difficult to secure without a full, detailed, and implementable planning permission. Securing an implementable planning permission is extremely difficult if small sites are not allocated. Without implementable consents lenders are uneasy about making finance available or the repayment fees and interest rates they set will be very high. Small developers, consequently, need to invest a lot of money and time up-front in the risky business of trying to secure an allocation and a planning permission, and this is money that many small developers do not have. Given the importance of ensuring small sites are allocated in order to support SME house builders it is essential that additional sites are allocated to ensure compliance with national policy.

### **S13 – Monitoring and review.**

#### The policy is unsound as it is not effective

13. This policy states that the Council will commence a full or focussed review of the Local Plan two years after its adoption. Given the Council decision to set the housing requirement at 80% of the new housing needs assessment in order to benefit from transition arrangements the HBF do not consider this policy to be effective as there is no mechanism to ensure that a new plan meeting housing needs in full is brought forward. The policy should commit the Council to an immediate update of the plan to ensure housing needs are met in full. In addition, the policy should state that this will be submitted for examination within two years of this plan being adopted and that should they fail to meet this deadline the policies relating to housing supply in this plan will be considered to be out of date. An example of a similar policy adopted in the Bedford Local Plan 2030 is attached at appendix A.

### **S14: Health and Well Being**

#### Policy is unsound as it is unjustified.

14. The final paragraph requires development of 50 or more homes to undertake a Health Impact Assessment (HIA) to assess the likely positive or negative impacts on health and wellbeing of different groups in the population. Whilst the HBF support the objective of ensuring development contributes to the creation of healthy places we do not agree that this then translates into the need for HIAs on all residential developments over 50 units. If a development, especially one that has been allocated in the local plan, meets the policy requirements of the plan then there should be no need for an HIA. The approach to development established by the plan should ensure that it secures positive health outcomes. The emphasis for HIA should be on ensuring the plan itself supports development that secures positive health outcomes rather than for this to be considered on an application-by-application basis. The HBF would suggest that an HIA is only required on larger developments of over 100 units that have not been allocated through the local plan and as such will not have had their health impacts properly assessed as part of the preparation of the local plan.

### **DM1: Size and Type of housing**

Policy is unsound as it is not justified.

15. The Council will require 5% of homes on sites of 100 or more dwellings to be delivered as self-build homes or as custom housebuilding. With regard to the evidence the Council suggest that this level of provision is supported by the Self Build register which indicates that on average 48 people join the register each year. We note that in paragraph 8.7 of the Strategic Housing Needs Assessment (2023) that since 2019 the Council has successfully met demand for self-build, and it would be helpful to know whether this has been a result of the policy in the adopted local plan which is the same as being proposed in DM1 or through windfall delivery. If it is through windfall delivery, consideration should be given to reducing or removing this requirement.
16. HBF would also suggest the policy includes a clause setting out when and self-build plots required through this policy would return to the developer if they were not sold. HBF would recommend that following a 6 month marketing period any plots that remain unsold revert back to the developer to be delivered as market housing. This will ensure that there is no delay in the delivery of these homes and empty plots left on housing sites to the detriment of other residents.

**DM2 – Affordable housing**

The policy is unsound as it is not consistent with national policy or justified.

17. This policy requires developments of 10 or more dwellings to provide 35% of the total number of residential units as affordable housing. In considering the viability of this policy, and indeed the deliverability of the plan as whole, the council must provide evidence to show that the cumulative impact of the policies in this plan will not make development unviable and render the plan undeliverable. HBF notes that the Council have published two whole plan viability studies, one undertaken by the Council and included as Part 5 of the SHELAA, and based on the HDH update from 2024, and one undertaken by HDH in 2023.
18. The Council will need to be clear as to which viability assessment has been used as the basis for considering the cumulative impact of these policies as there are differences in the inputs used and the subsequent outputs of each assessment. For example, in paragraph 6.6 the cost of meeting policy DM31 appears to have been ignored with just 3% of build costs applied with regard to carbon reduction, compared to the suggested 8% in the Viability

Update 2024 and the 12.5% in the 2023 Viability Assessment. Similarly, paragraph 6.7 on water efficiency sets out the cost of delivering homes to a 110 litre per person per day standard but the Council are proposing a 90 litre standard in DM25.

19. These changes have led to different outcomes. In the HDH assessment from 2023 it would appear from Table 10.2a that higher density flatted brownfield sites in Chelmsford will struggle to deliver the 35% affordable housing requirement in DM2 and that on this type of site viability assessment negotiations to reduce policy requirements will be the norm rather than the exception. On the basis of this evidence the policy is, therefore, contrary to paragraph 58 of the NPPF which states that decision makers should be able to assume that development that complies with all policies in the local plan are viable and would require a lower level of affordable housing on such sites to be set out in DM2 to ensure this policy and the plan as a whole is deliverable. However, turning to the Table 23 in the Council's own viability study from Autumn 2024 many of the scenarios that were marginal or unviable in 2023 are now considered to be viable.
20. Given the differences highlighted above the Council will need to provide a full list of what is different between each study and the justification for any changes if it is to show that this plan, and the plan as a whole is deliverable. The Council will need to provide a full list of what is different between each study and a justification for any changes.
21. HBF are also concerned that some of the costs in the Viability Assessment and Update by HDH are too high. Firstly, the sales values of affordable rented housing, set at 55% of the market value, could be too high given the current difficulties market housebuilders are having in selling S106 affordable homes to registered providers of social housing (RPs). A survey by the HBF<sup>1</sup>, covering 31 developers, revealed that as of October 2024 at least 17,432 Section 106 affordable housing units with detailed planning permission remain uncontracted. Across the country, 139 home building sites are currently delayed due to uncontracted Section 106 units. HBF would suggest that further work is undertaken by the Council to understand whether the value of S106 affordable homes is at the level suggested in the viability study. In addition, the difficulty in selling S106 affordable housing to RPs should be a consideration in policy and we suggest that the following new paragraph is included:

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<sup>1</sup> Bid Farewell. An examination of the crisis in S106 Affordable Housing (HBF, 2024)

*“Where evidence can be shown that following a suitable period of time and active marketing no registered provider is found to purchase affordable homes then the Council will consider proposals to amend the tenure of the affordable units.”*

22. Secondly the cost of delivering BNG may be underestimated given that the viability study is continuing to base its costs on those set out in the DEFRA Impact Assessment (IA) from 2019. As this is recognised by in the Viability Assessment this is of some vintage and should be noted that some of the costs within the IA are based on studies from 2017. For example, the cost of creating and maintaining one hectare of habitat on site is based on 2017 study by Natural Trust, RSPB, and the Wildlife Trust in relation to farms and not residential development. In particular the on site management the cost of creating and maintaining one hectare of habitat on site is based on 2017 study by Natural Trust, RSPB, and the Wildlife Trust in relation to farms and not residential development. In particular the on site management the cost of creating and maintaining one hectare of habitat on site is based on 2017 study by Natural Trust, RSPB, and the Wildlife Trust in relation to farms and not residential development. In particular the on site management costs may well be higher compared to the study and the Council will need to provide evidence to what these costs are rather than rely on those set out in the IA.
23. The cost of providing off site delivery of BNG is also underestimated in the IA with it being costed at £11,000 per biodiversity unit, whereas the current cost is over £30,000 for most units but increasing significantly for habitats that are more difficult to deliver. This will clearly have an impact on brownfield development which is more likely will rely on off-site delivery, but it will also impact on those green field sites where it is not possible to deliver BNG wholly onsite without reducing the land available for development. Finally, the cost of meeting policy DM31 are considered to be underestimated. This is addressed in our response to that policy set out below.

## **DM25 – Sustainable Buildings**

Policy is unsound as it is unjustified.

24. This policy will require new homes to be meet the tighter water standard of 90 litres per person per day (lpppd) – 20 lpppd lower than the minimum standard that is allowed for within the optional technical standard set out in both PPG and in part G of the Building



Regulations. HBF recognise that there is a need to manage water use through reduced, consumption, preventing leakages and increasing water supply across. Indeed, in partnership with Waterwise the HBF has launched a guide to provide tips on how households can reduce their water consumption. Research by the HBF has also found that new homes use around 40 litres less each day compared to older homes. Reductions that have come through nationally applied standard. As such the HBF consider the most effective approach to securing long term reductions is through nationally agreed regulations not ad hoc requirements in local plans.

25. In considering this matter the HBF recognises that the Secretary of State has said in a Ministerial Statement on the 19th of December 2023 in that “... *areas of serious water stress, where water scarcity is inhibiting the adoption of Local Plans or the granting of planning permission for homes, I encourage local planning authorities to work with the Environment Agency and delivery partners to agree standards tighter than the 110 litres per person per day (l/p/d) that is set out in current guidance*”. Whilst this was a statement from the previous Government HBF recognises that where water scarcity is inhibiting local plans from coming forward a tighter standard might be necessary where this is agreed with the relevant partners. However, from the evidence presented it does not appear to be the case that this is the case in Chelmsford.
26. HBF recognise that the Council is in area of water stress and that the lower standard of 110 lpppd is justified but there is no evidence to suggest that this local plan or development is being inhibited by a lack of water and as such there is no need for a lower standard than that set out in PPG and part G. The Council suggest in paragraph 3.116 of its Climate Change Topic Paper that the need to reduce water use to 90 lpppd is in line with Government Environment Improvement Plan and Plan for Water. However, neither of these documents appear to suggest that 90 lpppd should be allowed for through local plans. There is a suggestion that Government should consider mandating lower targets of 100 lppd but no mention of 90 lpppd appears to be made in either document. HBF therefore do not consider this policy to be sound as it is inconsistent with national policy and unjustified. The policy should be amended to require development to meet the minimum standard set out in PPG and Part G of the building regulation of 110 lpppd.
27. HBF question whether there is a need to provide EV charging point requirements for residential given that part s of the building regulations sets out the relevant standards for EV charging infrastructure in new development. HBF recognise that there may be additional

guidance required regarding on street/ public charging points that is not addressed in building regulation and as such suggest that this could be addressed by stating “*In addition to EV charging infrastructure required by Part S of Building Regulations ...*” and then setting out any guidance in relation to on street/ public EV charging.

### **DM31 – Net Zero Carbon in Operation.**

The policy is unsound as it is inconsistent with national policy

28. The proposed policy position would require all new development to fossil fuel free and demonstrate net zero operational carbon onsite by ensuring energy use standard for all new dwellings of 35kwh/m<sup>2</sup>/year and space heating demand of less than 15 kwh/m<sup>2</sup>/year (20 kwh/m<sup>2</sup>/year for bungalows). This would be demonstrated through an Energy Assessment, which for major applications must be a full energy strategy utilising accurate methods for operational energy use prediction, such as Passivhaus Planning Package (PHPP) or CIBSE TM54.
29. Whilst the HBF would agree with the Council that there is a need to act to reduce carbon emissions we would disagree that this needs to be undertaken through the local plan given that there is already a national approach, the Future Homes Standard (FHS), being taken forward to achieve the same goal. Delivering these improvements through building regulations has a distinct advantage over delivering a variety of different approaches across the county, in that it provides a single approach that all developers understand and can be rolled out at scale. This allows supply chains and skills to be improved prior to implementation and ensure that improvements to building standards are actually deliverable from the point at which they are introduced.
30. However, if the Council chooses to go beyond current or future standards it must be done in a way that is consistent with national policy and robustly assesses its consequences and gives consideration as to how the requirements are consistent with the written ministerial statement (WMS) published on the 13th of December 2023. Before considering the content of the WMS itself it is important to note the High Court judgement from the 2nd of July 2024 ([2024] EWHC 1693 Admin). This judgement was on the challenge to the WMS made by Rights Community Action on three grounds, including that the WMS restricted exercise by local authorities of powers conferred on them.

31. The judgment made by Justice Lieven was that the claim failed on all three grounds. In coming to these judgements Justice Lieven importantly notes the intention of the Government at the time with respect to section 1(1)c of the Planning and Energy Act 2008, which allowed Local Authorities to set standards above those in building regulations. Paragraph 65 states:

*“With respect to the current section 1(1)(c) specifically, the Minister confirmed councils “can go further and faster than building regulations, but within the national framework”. The Minister also addressed the overall intention of clause 1(2) in the following terms:*

*“The intention was for local authorities, in setting energy efficiency standards, to choose only those standards that have been set out or referred to in regulations made by the Secretary of State, or which are set out or endorsed in national policies or guidance issued by the Secretary of State. That approach was taken with a view to avoiding the fragmentation of building standards, which could lead to different standards applying in different areas of the country. Although supportive of the hon. Gentleman’s Bill, that was not an outcome that we wanted to achieve.””*

32. It is therefore clear that the intention of the original legislation was to ensure that energy efficiency standards within local plans were to be set within the scope of building regulations to avoid a multiplicity of standards coming forward. The judgment goes on to note in paragraph 66 that the WMS does not stray from this purpose.
33. It is also evident that not only is the WMS compliant with legislation but also in line with the intention of Planning and Environment Act 2008 which was to ensure that any policies seeking improved standards on those set out in Building Regulations must be set within the framework of those regulations. Local plan policies which seek to apply an alternative standard would not only be inconsistent with the WMS but also with the intentions of the legislation allowing local authorities to set lower standards.
34. Moving to the WMS itself, the housing minister notes that *“Compared to varied local standards nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes”* and that local standards can *“add further costs to building new homes by adding complexity and undermining economies of scale”*. After noting these concerns, the 2023 WMS goes on to

state that any standard that goes beyond building regulations should be rejected at examination if the LPA does not have a well-reasoned and robustly costed rationale that ensures:

- That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.
- The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).

35. HBF do not consider the approach set out in DM31 to be consistent with the WMS nor that the implications of such a policy have been properly assessed in the supporting evidence base. Our detailed points are set out below.

36. The approach proposed by the Council based on energy use is inconsistent with the approach set out in the WMS and as such is unsound. It should be noted that the Government have considered whether it was appropriate to use a delivered energy metric such as the one being proposed in the policy position paper and have concluded that these do not offer any additional benefits to those being taken forward by Government. Therefore, if the Council are to require standards above those set out in building regulations they must be expressed as a percentage of the target emission rate and not as an energy use target in order to avoid fragmentation of the standards with different requirements being set in different areas which it must be recognised was not only an expectation of the WMS but also of the legislation that permits council to adopt higher standards in local plan in the first place. As such the HBF do not consider the council to be justified in departing from either the WMS or the Planning and Energy Act (2008) and consider it necessary the energy use requirements to be deleted from this policy.

37. While HBF do not consider the policy to be consistent with national policy we are also concerned that the Council has not properly considered the impact on viability or the deliverability of development. The Council will need to ensure the costs and deliverability of this policy are fully and robustly tested. In preparing its viability assessment HBF suggest the Council consider costs published by the Future Homes Hub (FHH) as part of their work to support and inform the implementation of the Future Homes Standard. The costs for similar standards to those being proposed can be found in the FHH report '*Ready for Zero*'. This study tests a number of archetypes against a range of specifications from the current

standards set out in the 2021 Building Regulations through to standards that will achieve similar standards to those proposed by the Council.

38. The various specifications and costs considered are summarised in Figure 8 of '*Ready for Zero*' and indicates that in order to deliver standards above the FHS on a three bedroomed end of terrace house (specifications CS3, CS4 and CS5 in the FHH report) would be around 15-19% higher than the 2021 Building Regs, around £17,000 to £22,000 more per unit. The council's Viability Update Note 2024 suggests the costs of achieving its proposed policy to be 8% above current regulations with Council's own viability assessment suggesting at paragraph 6.6 an increase on build costs of only 3% in relation carbon reduction. HBF recognise that the specifications are not direct comparison, but it does give an indication as to the potential cost and that the 8% increase in built cost proposed by the Council appears low. In fact, these are also lower than the cost of delivering net zero homes in the Council's earlier evidence. The work by Three Dragons and Qoda Ward Williams Associates cited in paragraph 8.79 of the 2023 Viability Update noted that the cost of zero carbon would be 12.5% of the cost of construction. This is significantly higher and closer to the costs cited by the Future Homes Hub. Given that there is still significant uncertainty as to the cost of delivering the standards being proposed the Council will need assess the impact of a higher cost in relation to the delivery of the development proposed in this local plan.
39. With regard to deliverability of zero carbon homes HBF would not disagree that the proposed standards are technically feasible. However, HBF are concerned as to the impact these requirements will have on the rates at which sites can deliver new homes on all types of sites. Given that the standards proposed are higher than those proposed in the Future Homes Standard and will require higher levels of fabric efficiency, which in turn will require new skills and materials that may not be readily available, HBF are concerned this could slow delivery in the short to medium term as supply chains are developed and robust evidence will need to be provided to show that this will not be the case in Chelmsford.
40. It has been recognised by the FHH that to deliver higher standards will require phased transitional arrangements to enable a steady build-up of skills and ensure quality. The FHH also notes in its report Ready for Zero that even if a short transition period between current standards and those similar to the Council are proposing that this would "... *create a high risk of quality problems, inflated costs and, potentially, stalled build programmes.*" However, HBF could find no evidence that the Council has considered whether its proposed standard will impact on the rate at which new homes can be built. The Council will need to speak


directly to a range of housebuilders operating in Chelmsford to understand the impact of its policy on the rate at which homes will be delivered on its allocated sites. Without any consideration of delivery then the Council's decision to go beyond what is required by building regulations is clearly unjustified

41. While HBF understands the desire for LPAs to go further current policy recognises that even where development can viably implement higher standards this must be within a consistent technical framework and approach to assessing building performance against those technical standards. Indeed, this has long been the case in planning policy with paragraph 159b of the NPPF stating that *"Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards"*.
42. If the Council have the evidence to show that the policy is deliverable the Council will need to ensure that all other policies in the local plan are consistent with delivering the levels of embodied carbon being proposed. The most energy efficient design will inevitably lead to less variety in the built form in order to reduce the surface area of the building. This will need to be reflected in design policies and any design codes that are produced to ensure that development is not refused for seeking to meet energy efficiency standards but, for example, not being designed in the character of the local area.
43. HBF would also recommend that that if a net zero policy is to be included in the local plan it should require a development to be net zero rather than for individual homes. As the council will be aware some homes, such as terrace houses and flats, are more intrinsically energy efficient and emit less carbon compared to detached homes and bungalows. As such it may be difficult for some individual homes to be net zero but where there is a mix of development the site as a whole to achieve the required standard.

## **Conclusion**

44. At present we do not consider the plan to be sound, as measured against the tests of soundness set out in the NPPF. I can therefore confirm that the HBF would like to participate in any hearing sessions held at the examination in public on the matters raised in our representations and that we would like to be kept informed of the submission and examination of the local plan.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Mark Behrendt'.

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## **Appendix 1: Review Policy from Bedford Local Plan 2030.**

### **Policy 1 - Reviewing the Local Plan 2030**

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*The Council will undertake a review of the Local Plan 2030, which will commence no later than one year after the adoption of the plan. An updated or replacement plan will be submitted for examination no later than three years after the date of adoption of the plan. In the event that this submission date is not adhered to, the policies in the Local Plan 2030 which are most important for determining planning applications for new dwellings will be deemed to be 'out of date' in accordance with paragraph 11 d) of the National Planning Policy Framework 2019.*

*The plan review will secure levels of growth that accord with government policy and any growth deals that have been agreed. The planning and delivery of strategic growth will be aligned with the delivery of planned infrastructure schemes including the A421 expressway, Black Cat junction, East West Rail link and potentially the A1 realignment.*

*The review will also serve to build stronger working relationships with adjoining and nearby authorities and may result in the preparation of a joint strategic plan based on a wider geography.*