

SENT BY EMAIL
29/05/25

Dear Inspector

PETERBOROUGH LOCAL PLAN – HOUSING SUPPLY

1. Thank you for consulting with the Home Builders Federation (HBF) on the Draft Peterborough local plan. HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which include 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.
2. The Council is probably aware that policies LP2 and LP3 have been given the same title as LP1. HBF assumes this is an error given that in paragraph 5.41 these policies are called respectively Spatial Strategy for Housing and Spatial Strategy for Employment. HBF have therefore referenced these policies on the basis of the headings in that paragraph.

Viability Assessment

3. HBF are concerned that the Viability Assessment (VA) underestimates the cost of development in Peterborough. Firstly, the study needs to be updated to consider the impact of the Building Safety Levy. The Government's response¹ to the latest consultation will see development in Peterborough pay £13.36 per m² on previously developed land (PDL) and £26.73 per m² for land that is not PDL. While these are still to be formally adopted following parliamentary consideration given that there are now clear costs being associated with the levy they cannot be ignored and must be included in the VA
4. Secondly the study underestimates the cost of delivering BNG. The VA bases the cost assumptions for BNG on research commissioned by Kent County Council which suggests that the cost of delivering 20% will not be significantly more than the statutory 10% minimum. However, in considering the cost of delivering BNG it must be recognised this will depend significantly on the type and extent of the different habitats found on site. Some sites will find it relatively simple to deliver 10% or even 20% onsite others will find it more difficult and require significantly higher levels of offsite delivery, which increases costs significantly. Therefore, it is concerning that in referring to the research by Kent County Council the VA does not outline that the cost of offsite credits used

¹ [Building Safety Levy: Technical consultation response](#) (March 2025)

in that study are based on the 2019 DEFRA Impact Assessment which assumed costs of these at £11,000. Our members are experiencing costs of over £30,000 per unit with this increasing significantly for more complex difficult to deliver habitat types and the location of where offsetting units are being delivered. The VA will also need to increase the cost to recognise that a significant proportion of any delivery over the 10% minimum will likely be delivered through offsetting. This will result in the cost of delivering the additional 10% will be higher than for the initial gains required by statute. However, the VA only includes an additional 50% cost for meeting the additional BNG being proposed by the Council.

5. The introduction of BNG will also impact on the net developable area of a site. HBF notes that for its generic site typologies the VA uses an 80% NDA. However, this is taken from VOA guidance prior to the introduction of BNG with the NDA on sites in future likely to be lower than this figure given that the Council is not reducing its requirements for other policies (such as LP35 and LP41) that will impact on the NDA. HBF considers the NDA for the typology assessment is reduced to reflect the requirement to deliver BNG.

LP2: Spatial Strategy for Housing

6. This policy sets out that the Council are planning for the delivery of 20,120 new homes across the period of 2024 to 2044. This is consistent with the 1,006 dwellings per annum (dpa) minimum that the Council should be planning for based on the standard method at the time the Council published the local plan. However, as set out in paragraph 2a-008-20241212 the housing need figure generated by the standard method will need to be kept under review and revised where appropriate. The Council will no doubt be aware that the new data on work placed based affordability ratios was published in March 2025, reducing the five year average affordability ratio to 6.88 and reduces the annual minimum housing need to be planned for to 974 dpa.

Housing supply

7. To meet this minimum requirement the Council will facilitate through the plan approximately 22,130 new homes. This level of delivery provides a 10% buffer in supply, which is the minimum HBF would expect to be necessary to ensure that the minimum requirement can be delivered over the plan period.
8. The Council will need to consider whether it should increase supply in order to better meet the need for affordable housing in Peterborough. As the Council note it has been difficult for local people on lower incomes to secure market housing even though house prices in Peterborough are generally lower than those across the region. The Draft Local Plan states that at present the need for affordable housing is 477 dpa – approximately 47% of the housing requirement and around 43% of total housing supply. As the Council will be aware PPG states at paragraph 2a-024-20190220 that “*An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes*”. Given that a significant proportion of new affordable housing in Peterborough will be delivered through the allocation of market led housing

sites, HBF would suggest the Council consider the potential additional allocations in order to increase the provision of market housing.

9. HBF also note that based on the housing trajectory set out in MO003a the five year land supply on adoption will be relatively weak at 5.15 years. See table 1 below.

Table 1: Five year housing land supply on adoption

Period	2027/28 to 2031/32
Requirement	1006
Cumulative	4024
Delivery	1180
Cumulative	4485
Surplus/deficit	0
Five year requirement	5030
add deficit/ surplus	5030
Buffer	252
Total req	5282
Five year supply	5437
Surplus/deficit	156
5YHLS	5.15

10. This will mean that any changes in the supply the plan progresses to examination could lead to the plan not having a five year land supply on adoption. HBF would suggest that to avoid this situation more sites should be identified that will come forward in the first five years of supply. Primarily any additional supply should be identified on small sites of less than one hectare which not only come forward quickly but support the growth of the SME housing building sector – a point we consider in more detail below.

10% small sites

11. The Council will need to ensure that at least 10% of the homes delivered over the plan period are on identified sites of no more than one hectare – as required by paragraph 73a of the NPPF. HBF could not find any evidence to show that this requirement of national policy will be met, and if it has not been met why not. In meeting this requirement, the Council will need to ensure that the sites contributing to this requirement are either an allocation in the local plan or specific site identified in the Brownfield Register and does not include the small site windfalls allowance within the 10% requirement. Whilst it will be important to promote more small sites to come forward over the plan period as windfall, as mentioned in part d of paragraph 70 of the NPPF, this is distinct from the 10% requirement set out in part a of paragraph 70 of the NPPF. Further clarification that the 10% should not include windfall development is in the glossary where windfall is defined as “*Sites not specifically identified in the development plan*”. (our emphasis)
12. It is important to recognise that the allocation of small sites is a priority and stems from the need to support small house builders by ensuring that they benefit from having their sites identified for development either through

the local plan or brownfield register. The effect of an allocation is to take some of the risk out of that development and provide greater certainty that those sites come forward. This in turn will allow the SME sector to grow, deliver homes that will increase the diversity of the new homes that are available as well as bring those homes forward earlier in the plan period.

13. The Council should also recognise that allocating small sites and supporting SME house builders not only ensures a stronger supply in the short term but also improves the diversity of choice within local housing markets, support local and regional supply chains and are often pivotal in bring forward innovation and supporting jobs growth locally, with 1 in 5 of the SME work force comprising of apprentices. A failure to allocate small sites will contribute to the continued decline in small and medium sized house builders. Recent research by the HBF has found that there are 85% fewer small house builders today than there was 20 years ago and that of a survey of SME house builders 93% said that planning was a major barrier to SME growth. Whilst this decline is due to a range of factors more allocations of small sites would ease the burden on many SME developers and provide more certainty that their scheme will be permitted, allowing them to secure the necessary finance that is often unavailable to SMEs until permission is granted.
14. Therefore, in order for the plan to be consistent with national policy the Council should not just seek to maximise delivery from the small sites that do come forward but to actively promote these through allocations in the local plan.

Housing trajectory

15. Paragraph 77 of the NPPF requires local plans to include a trajectory illustrating the expected rate of housing. This is provided in Figure 5 on page 145 of the Draft Local Plan. However, this is a purely illustrative trajectory and does not provide any details as to the actual number of homes that are expected to be built each year. Therefore, it does not contain sufficient detail to be effective in decision making or monitoring the performance of the local plan. The trajectory should be amended to include the number of homes that are expected to be delivered each year. In addition, paragraph 7 suggests that Councils should consider setting out the delivery rate for specific sites within the local plan. HBF consider that this level of detail should be included to ensure that it is clear to all how many homes are expected to be built annually on each of the allocated sites across the plan period. These changes should be relatively simple given that MO003a already contains this information.

LP8: Design

16. Part H requires all homes to be built to Nationally Described Space Standards. As the council will be aware the decision to adopt these standards must be justified on the basis of both need and viability. The Council have considered space standards in the viability evidence, but HBF could not find any evidence as to the need for these standards. If the Council is to adopt NDSS then it must provide the necessary evidence.

17. Part J requires development to encourage a sense of ownership with a clear strategy for ongoing management and stewardship. Firstly, not all developments will require strategy for management and stewardship and HBF would therefore recommend that the sentence opens with where necessary. Secondly HBF would also suggest that the need for these to create a sense of ownership is ambiguous policy and one that is impossible to monitor effectively and should be deleted.

LP10: Energy Efficiency

18. Part A of this policy states that new residential development will only be considered if the scheme demonstrates its efforts towards reducing demand, resource efficiency and renewable energy production as per the Future Homes Standard. In assessing compliance with this policy, the Council will require development to produce a sustainability statement setting out: how a development complies with the energy hierarchy; that no fossil fuels will be used directly in its operation, that it meets the PV requirements of the policy and there is metering to monitor performance post occupation.
19. Part i requires developers to show compliance with the energy hierarchy. More detail is then provided in the supporting text at paragraph 6.20 and 6.21. These paragraphs outline that in order to demonstrate that energy use has been reduced as required by the energy hierarchy ten sustainability statements must include an Energy Use Intensity calculation that identifies overall energy demand and that it meets the targets set by Government. Reference is also made to LETI guidance and recommends that calculations on EUI are made using CIBSE TM54 modelling guidance. However, the approach being suggested in these paragraphs is not consistent with national policy as expressed in the Written Ministerial Statement (WMS) on local energy efficiency standards².
20. The WMS 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).
21. The approach proposed by the Council is based on energy use and is therefore inconsistent with the approach set out in the WMS which states that any additional requirements should be expressed as a percentage uplift in

² [Planning - Local Energy Efficiency Standards Update Statement](#) December 2023

the dwellings target emission rate and should be calculated using SAP. What the Council are in proposing is for developers to use an alternative assessment procedure to monitor a standard that is not set out in building regulations. Whilst HBF recognise the importance of reducing carbon emissions to reduce their impact on the climate it is vital that this is done in a consistent manner, as required by the WMS and as such parts i and paragraphs 6.20 and 6.21 are unsound and should be deleted if the policy is retained.

22. Turning to subsection iii of part A of LP10 which would require each dwelling to include a 40% provision of Photovoltaic (PV) to the floor area requirement for all dwellings. This level of provision reflects option 1 in the most recent consultation on the Future Homes Standard. However, there is still no confirmation from Government as to whether it will require this level of provision. Firstly, if a 40% floor space requirement for PV is to be included as part the FHS then this policy would repeat building regulations and should not be included in the policy. If the standard is not included, then that will be due to the significant concerns raised about delivering this level of solar PV provision. HBF has raised concerns with Government that stipulating a value against a required floor area is too prescriptive and will limit innovation in the development of other ways of making new homes more energy efficient. The Housing building industry welcomes the use of PV as part of the Future Homes Standard, but the prescription of a specific and arbitrary proportion of roof coverage would be practically challenging and likely to result in significant unintended consequences. One significant outcome of such an approach would be a negative impact on house design. The specificity of this requirement will see a reduction in small and mid-terraced properties that are unable to occupy afford the roof space needed to meet the requirements. These are often the types of homes suitable and affordable for first-time buyers. the delivery of two-and-a-half and three-storey properties occupying a room in the roof will also be negatively impacted by the minimum requirement of PV.
23. In addition, any property type that occupies a dormer window or glazed roof light will not be able to successfully achieve the 40% requirement. The street scene design including place making, local vernacular, good design and beauty may all be affected by over the necessary provision of PV. Roof design including chimneys, tiling details, finials in addition to varying roofscapes, hips and gable roofs will all be impacted upon and will likely become obsolete as roof styles and orientations will become more standardised to accommodate the required volume of PV. This will inevitably mean that in some locations in Peterborough it will become difficult to ensure development is in keeping with the character of the area and lead to more generic homogenous design. As such HBF do not consider this level of provision to be currently justified and should be either reduced or removed entirely. This will also mean that if the 40% standard is in FHS the Council will need t ensure that the relevant policies relating to design take this into account.
24. The final subsection of Part A requires a metering approach to measure energy use and post-performance. While the use of Smart meters to monitor performance and which is then accessed by the occupant and energy company it is wholly inappropriate for this to be used to monitor a household's energy use post occupancy. HBF assumes this is to ascertain whether the building has been built to the stated requirements but given that all households

consume energy differently this will not necessarily show that homes are more or less energy efficient and would be ineffective as well as unnecessary intrusion.

25. Given that the key objective of Council is that homes in future will be built to the Future Homes Standard it is difficult to see why this policy is required, especially as it seeks to use alternative assessment methodologies have no relation to the standards being proposed. HBF recognise that local authorities want to see higher standards introduced and delays to the implementation of the FHS are creating uncertainty. However, the vast majority of homes being proposed in this plan will be built to the FHS and as such HBF sees no reason why a policy is necessary, and which will likely be redundant by the time the plan is adopted. HBF would therefore recommend that the whole policy is deleted from the plan.

LP11: Affordable Housing

26. This policy proposes a 30% affordable housing requirement on all sites of 15 or more dwellings. As set out above there are additional costs that will need to be taken into account in the viability assessment. In some scenarios these may make development unviable, and the council will need to consider whether a 30% affordable housing requirement remains viable.
27. HBF note that the Council also states in the policy that they will negotiate with developers taking into account financial viability. This position is welcomed given that table 10.2a of the VA shows that many schemes within the city centre on PDL will be rendered unviable by the policy costs being placed on them by this local plan. However, given this situation HBF would suggest that the Council could use a variable rate with sites in city centre providing a reduced level of affordable housing to reflect the viability evidence. NPPF is clear at paragraph 59 that where there are up to date policies it can be assumed that development is viable when all contributions are taken into account. This is not the case with development in the city centre and the evidence would suggest a separate affordable housing requirement would be justified.

LP30: Embodied Carbon

28. Part B requires major development to set out how they have lowered up front embodied carbon below specific limits. This will require the submission of an up-front embodied carbon assessment using the Net Zero Carbon Building Standard. The policy does not specifically state what these particular limits are other than they are in line with the Net Zero Carbon Building Standard.
29. Firstly, HBF does not consider this policy to be sound. While it is important to reduce carbon emissions from the construction of new homes as with energy efficiency this must be left to building regulations to ensure a consistent standard across the country. This will allow assessment methodologies to be agreed upon and product manufacturers to respond to this issue. This will also ensure that the cost of meeting specific standards with

regard to embodied carbon can be accurately assessed and taken into account in viability assessments – something that so far the council has not considered.

30. Secondly, the council require development to meet a standard that is seemingly set out in a supplementary document. This is unsound as policy can only be set in the local plan itself to ensure that standards are not changed without the proper scrutiny afforded to a policy brought forward in a local plan.

LP31: Flood and Water Management

31. HBF does not consider subsection i and iii of part B to be sound.
32. When considering water and wastewater capacity it must be recognised that water companies are subject to statutory duties under S37 and 94 of the Water Industry Act 1991 (WIA 1991). Section 37 of the Act, set out below, imposes a statutory duty on all water companies to provide and maintain adequate infrastructure and potable water supplies.

“S37 General duty to maintain water supply system etc. (1) It shall be the duty of every water undertaker to develop and maintain an efficient and economical system of water supply within its area and to ensure that all such arrangements have been made— (a) for providing supplies of water to premises in that area and for making such supplies available to persons who demand them; and (b) for maintaining, improving, and extending the water undertaker’s water mains and other pipes, as are necessary for securing that the undertaker is and continues to be able to meet its obligations under this Part. (2) The duty of a water undertaker under this section shall be enforceable under section 18 above— (a) by the Secretary of State; or (b) with the consent of or in accordance with a general authorisation given by the Secretary of State, by the Director.”

33. Section 106 of the WIA 1991 confers the power to connect to a public sewer. Section 106(1) states that the owner of any premises or the owner of any private sewer which drains premises, shall be entitled to have its drains or sewer communicate with the public sewer of any sewerage undertaker and therefore discharge foul water and surface water from those premises or that private sewer. Specifically, in relation to wastewater, the Supreme Court considered this matter in 2009 – see *Barratt versus Welsh Water* [2009] UKSC 13. Paragraph 23 of the decision is salient. Given its importance in the context of wastewater it is recited in full below:

*“The right to connect to a public sewer afforded by section 106 of the 1991 Act and its predecessors has been described as an “absolute right”. The sewerage undertaker cannot refuse to permit the connection on the ground that the additional discharge into the system will overload it. The burden of dealing with the consequences of this additional discharge falls directly upon the undertaker and the consequent expense is shared by all who pay sewerage charges to the undertaker. Thus, in *Ainley v Kirkheaton Local Board* (1891) 60 LJ (Ch) 734 Stirling J held that the exercise of the right of an*

owner of property to discharge into a public sewer conferred by section 21 of the 1875 Act could not be prevented by the local authority on the ground that the discharge was creating a nuisance. It was for the local authority to ensure that what was discharged into their sewer was freed from all foul matter before it flowed out into any natural watercourse.”

34. Consequently, it is inappropriate to include a policy in the local plan requiring all development when applying for planning permission to demonstrate that water is available to support the development being proposed and that adequate foul water treatment and disposal already exists or can be provided. HBF agrees that there must be sufficient water capacity and wastewater infrastructure to serve new development. But it is the responsibility of water companies, working with local authorities and the Environment Agency, to plan for the future demand for water services relating to the development requirements proposed in local plans, not applicants. If the water company is unable to supply those needs, this needs to be disclosed in the Water Resource Management Plan.
35. This approach is also the one advocated in national policy with paragraph 34-002-20140306 outlining the need for early discussion with water and sewage companies to help ensure proposed growth is reflected in company business plans and long term water resource management plans. This is reiterated in paragraph 34-016 of PPG which states: *“Planning for the necessary water supply would normally be addressed through authorities’ strategic policies, which can be reflected in water companies’ water resources management plans Water supply is therefore unlikely to be a consideration for most planning applications”*. As such if there is insufficient capacity to support new development this will need to be addressed with sites for new or enhanced water and wastewater infrastructure being identified in the local plan. If there is no identified way of addressing that capacity, then the only assumption must be that the plan is not deliverable over the plan period and as such unsound. Such issues cannot be left to development management policies that require all development to assess capacity.
36. However, HBF recognise that paragraph 34-016-20140306 in PPG goes on to state that there may be exceptions where water supply issues may be considerations for planning applications. This paragraph states:

“Water supply is therefore unlikely to be a consideration for most planning applications. Exceptions might include:

- large developments not identified in plans that are likely to require a large amount of water; and/or*
- significant works required to connect the water supply; and/ or*
- where a plan requires enhanced water efficiency in new developments as part of a strategy to manage water demand locally and help deliver new development.*

37. What is notable from this paragraph is that the only exception relating to the impact on water capacity is the first bullet which would suggest that local planning authorities should consider the impact on water supply of large developments not identified in plans. The other exceptions relate to considering significant connections and

ensuring that any enhanced water efficiency measures that are included in the plan are in place. Therefore, part i. and iii are unsound as they require all development to assess capacity of water infrastructure to support development. These are matters to be considered through plan making and not development management, unless it relates to large unplanned development. HBF therefore recommend that subsection i and iii are deleted from Part B of LP31. If the Council are minded to include consideration relating to capacity this must state that it is only in relation to large sites that have not been identified in the local plan.

LP36: Green Infrastructure

38. HBF recognises that new development should provide green and open spaces on site for both the benefit of those people living there and for the wider community. However, these requirements need to be proportionate, viable and deliverable. HBF does not consider the inclusion of the Urban Green Factor (UGF) to be justified or effective. Firstly, there is no consideration within the Viability Assessment as to the financial impact of this policy on the viability of new development. In particular HBF are concerned that use of the UGF alongside BNG and the minimum tree coverage could significantly reduce the developable area of site, not only reducing the viability of sites but also the number of homes that can be delivered across Peterborough.
39. Whilst some work has been undertaken to examine whether this level UGF is deliverable it is limited with the level of urban greening considered on just five consented residential schemes and with just one achieving the 0.4 standard. This would suggest that achieving this standard will be challenging for many developments without significantly reducing the number of homes that can be delivered on site and reducing the viability, given that offsite delivery of urban greening is not possible. The Council must therefore identify in its evidence the potential loss of development land resulting from the proposed UGFs on all its allocated sites and consider the impact this will have on the viability of these sites. While the HBF recognise that the policy includes a degree of flexibility should there be consequences for the viability of a development, it is essential that the policy impacts are properly tested as part of the development of the plan in order to avoid, as far as possible, the need for site by site negotiations with regard to this particular policy. Without this evidence the only consultation that can be reached is that the requirements relating to the Urban Greening Factor in this policy are unjustified and should be deleted.
40. Secondly, if the policy can be justified it is necessary to recognise within policy the wider general contribution to green infrastructure that is made on strategic sites when considering reserved matters applications. One such example is outlined in the Council's evidence. Application 23/00464/RES is a development parcel on a strategic allocation and indicates a UGF of 0.09. However, this is based on a red line boundary drawn tightly to the development that seemingly fails to take into account of the wider green infrastructure that is delivered adjacent to that development and across the whole of the strategic allocation. A tight red line boundary such as this to the development site would exclude green spaces that would ordinarily contribute to the UGF score for that site. HBF therefore consider it necessary for soundness that the policy requires decision makers to take into account

green infrastructure delivery across the whole of a strategic allocation when considering applications for development parcels on such sites.

41. Finally, the various weightings that are attached to each type of surface cover and the formula for arriving at the UGF have not been set out in the local plan. While it is suggested in paragraph 13.32 of the draft local plan that more detail will be provided in an SPD HBF are concerned that the various weightings attributed to surface cover could be amended without the scrutiny afforded by a local plan examination. Given that even small changes in these factors could result in significant increases in the amount of urban greening that is required, they must be set out within the local plan itself.

LP38: Biodiversity and Geological Conservation

42. This policy will require all development in Peterborough must deliver at least a 20% biodiversity net gain, unless the development is not subject to the statutory framework for biodiversity net gain. HBF consider this requirement to be unjustified.

43. The latest guidance published by Government on the 14th of February and highlight the statement that:

“... plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies, they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented”.

44. It is important to note that the starting point is that local plan should not seek a higher requirement. This is different to a permissive policy allowing local plans to seek a higher level of BNG where justified, and the HBF would argue that it should be considered a high bar with regard to the evidence required to justify such a policy. There must be very robust evidence that the area is significantly worse than the country as whole and that this decline is directly related to the new development being rather than for example changes in agricultural practices or industrial pollution. It is not sufficiently robust to highlight declines in species that whilst important are not necessarily as a result of new homes being built.
45. The HBF does not disagree with the broad thrust that the UK has seen a significant loss in biodiversity not just in recent past but previous centuries and as such recognise the importance of ensuring that the outcome of new development in future is that there is a net gain in biodiversity. However, it is important to recognise that in recent years new residential development has not been the driver of declining biodiversity either locally or nationally and in particular over the last 50 years. The main drivers of declining biodiversity in England, as outlined in the State of Nature Report 2023 (State of Nature Partnership, 2023), as being “*Intensive management of*

agricultural land, largely driven by policies and incentives since World War II, has been identified as the most significant factor driving species' population change in the UK". Therefore, whilst it is important for development to ensure that it improves the natural environment the main driver of biodiversity it is important to also recognise it is not currently a significant driver of biodiversity decline in Peterborough.

46. HBF would suggest that the evidence represented by the council does not meet the high bar necessary to support a 20% biodiversity requirement. Instead, the council should work with developers to ensure that they can deliver the 10% requirement. This is still a new approach for both local councils and the development industry and they should be looking to ensure this works first before looking to go well beyond statutory minimums.
47. However, if the Council choose to continue with the 20% requirement and it is considered to be sound at examination it will be necessary for soundness that flexibility is included in the local plan with regard to the percentage of net gain required above the statutory minimum. The policy should clearly state that where this is impacting the viability and deliverability of a development that any BNG requirement will be reduced to the 10% statutory minimum.
48. The second paragraph under Part D of this policy states that where BNG is delivered off site it should be delivered as close as possible. It then goes on to state PCC project will be prioritised. It's not clear what this means. It implies that developers will be required to use PCC projects ahead of any other which would be inappropriate should there be offsite delivery closer to where the site is located. It also fails to recognise that net gains delivered within the same character area but outside the borough would be equally appropriate as those provided by the Council within PCC. The Council need to provide more clarity as to what it intends in this statement.

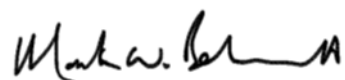
LP41: Trees Woodland and Hedgerows

49. HBF considers the 10% increase in existing canopy or 15% minimum canopy cover to be overly onerous and fails to consider the impact this may have on developable areas and BNG. While HBF recognises the benefits of tree planting this should be considered on a site by site basis having regard to need for unfractured, BNG pen spaces etc. rather than a fixed percentage.

Future Engagement

50. 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 housebuilding industry.
51. 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,

A handwritten signature in black ink, appearing to read 'Mark Behrendt', with a stylized flourish at the end.

Mark Behrendt

Regional Planning Manager – SE and E

Email: mark.behrendt@hbf.co.uk

Phone: 07867415547