

Dear Sir/ Madam

HUNTINGDONSHIRE LOCAL PLAN

1. Thank you for consulting with the Home Builders Federation (HBF) on the preferred option for the Huntingdonshire Local Plan.
2. 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.

Draft Policy LP 1

3. Our first concern regard to the period over which total housing need is derived. The Council have chosen to start the plan period from April 2021. From this point to December 2024 the Council are proposing to use the outcomes of the standard method in those years, or part years to take account of changes to the outcome of the previous standard method. The Council then uses the current standard method from December 2024 onward. It is not stated in the local plan why this approach is being used but HBF does not consider it to be consistent with the national policy.
4. When considering the starting point over which housing needs should be planned for it is important to note that the standard method is a forward looking assessment of housing need that takes into account any past supply. This principle is established in paragraph 68-031 of PPG which states with regard to past under delivery "*Where the standard method for assessing local housing need is used as the starting point in forming the planned requirement for housing, Step 2 of the standard method factors in past under-delivery as part of the affordability ratio, so there is no requirement to specifically address under-delivery separately when establishing the minimum annual local housing need figure*". This is a clear statement that when using the standard method councils should be looking forward from the point at which the assessment is made, and that past supply is wrapped up in the affordability adjustment. As such the approach being taken by the Council does not align with national policy.
5. The starting point for the period over which housing needs are considered should be the year in which the housing needs assessment is undertaken. On the basis of the Council's Local Development Scheme, it is the Council's ambition to undertake a regulation 19 consultation in the summer of 2026 and submit prior to December of the

same year. This means that the assessment of housing needs will have been undertaken in 2026 and is based on the most recent data published at that time with regard to dwelling stock and the affordability ratio. Dwelling stock ratios at the point of assessment will be 2025 with the affordability ratio the most recent data in used for the pre-submission local plan and at the point submission will be the updated ratios published by ONS in March 2026 with the five year average being taken from the years 2021 to 2025. As the data used to support the assessment of housing needs was based on data relating to 2025 it would suggest to the HBF that the plan period should start from 2026/27.

6. No reason has been given in the local plan as to why the Council have chosen this relatively complicated approach establishing the housing requirement and starting the plan period some five years before the plan is submitted for examination – but it would appear that the Council were seeking to include a period of housing supply which exceeded the requirement. Over the period 2021/22 to 2023/24 the Council delivered 3,579 homes against a housing requirement of 2,412 homes – a surplus of 1,167 homes. This over supply then offsets the lower levels of delivery in the subsequent years against the higher housing requirement. If the housing delivery assumptions in the latest AMR are used the Council would have a surplus of 227 homes in 2026/27. If the Council were to adopt the approach HBF considers to be consistent with national policy, the Council would have a deficit of 404 homes by the end of 2026/27.
7. The Council should not be using past over delivery from over five years before the plan is submitted for examination to seek to reduce the number of homes that must be delivered early in the plan period. The starting point for the housing requirement, and land supply to meet that requirement, should be 2026/27. Based on the outcome of the current standard method of 1,232 dwelling per annum (dpa) this will require the Council to identify land to deliver a minimum of 24,640 homes by 2045/46.
8. However, in paragraph 4.19 the Council state that an uplift of 10% has been provided to the target to help make sure the local plan stays up to date, and to reduce the risk of needing to find extra land for housing later in the plan making process. HBF is supportive of the Council applying a 10% uplift to ensure needs are met in full, but what is not clear from the local plan is whether this is an uplift to the housing requirement, or if it is a commitment to ensure that supply exceeds the minimum requirement by 10%. If it is the former, then this needs to be clearly set out in LP1, stating not only how many homes in total will be delivered but the also the number of homes that are needed each year to meet the housing requirement. If the 10% is to be added to the housing requirement, then the annual housing requirement for Huntingdonshire would be 1,355 dpa – a total of 27,100 homes from 2026/27.
9. The need for specificity is essential to ensure that there is no confusion as to what the minimum requirement is and how the five year land supply will be assessed moving forward. If the intention is to increase the housing requirement by 10% LP 1 must be amended as follows: “*To meet Huntingdonshire's future housing needs in the period 2026 to 2046 a minimum of 1,355 homes will be delivered each year*”. If the Council’s position is that they are planning for an extra 10% in supply as a buffer to ensure needs will be met in full then this must be

clearly stated in the supporting text and the annual requirement in LP 1 amended to state, the annual requirement is 1,242 dpa.

Housing supply

10. The Council state in paragraph 4.21 that once completions and commitments are taken into account the absolute minimum number of homes the Council is required to plan for through this local plan is 11,547 dwellings, or 14,587 if the 10% buffer is applied. However, as noted above the Council's plan period starts in 2021 and includes 4,437 homes delivered between 2021/22 and 2024/25. If the delivery expectations in the latest AMR are accurate then a further 754 homes would be delivered outside of what HBF considered to be a sound plan period. Therefore, the number of commitments that will be delivered from 2026/27 is estimated to be 12,513 and the number of additional homes that must be found to meet the standard method is 12,127, or 14,587 if the 10% uplift is applied to the requirement. Notably, it would appear that with a 10% uplift to the housing requirement the Council would be planning for the same number of additional homes above existing commitments and completions if the plan starts in either 2021/22 or 2026/27.
11. To meet needs in full the Council are proposing allocations in this local plan deliver a further 15,447 homes by 2046 resulting in total delivery over the plan period of 27,990 homes. As such there is a contingency within the housing land supply over the minimum required by the standard method between 2026/27 and 2045/46 of 3,350 homes – a 13.5% contingency. If the 10% uplift is applied the requirement, then the contingency drops to 890 homes – around 3%. In addition to this the Council state that they expect around 2,000 homes to be delivered on windfall. It is stated that these are not relieved on to meet needs in full. As such they will form part of any contingency. HBF would support such an approach given that there can be no certainty as to how many homes will come forward as windfall over the next 20 years.
12. HBF recommends that the contingency in supply of between 10% and 20% is necessary to be certain that housing needs will be met in full. Whether the Council has sufficient contingency to meet its housing requirements in full will therefore depend on what that requirement is. If the requirement is 1,355 dpa then we would suggest additional, supply is necessary to ensure housing needs are met in full. If the requirement is the standard method of 1,232 dpa consideration should be given to increasing supply but this will depend more on the nature of the sites being allocated and the risk that these may not come forward as expected. However, as the Council are still to produce a detailed trajectory setting out when each site that is required to meet needs will come forward and the rate at which they will deliver new homes it is not possible to comment on whether the expected level of contingency in supply is sufficient.

10% of housing requirement on small sites

13. The Council must ensure that it meets the requirements in paragraph 73 of the NPPF that the at least 10% of its housing requirements are on sites of one hectare or less. In meeting the requirement in paragraph 73 of the NPPF the Council must ensure it is achieved from identified sites – either as an allocation in the local plan or as a site in the Council's Brownfield Register. The Council must not rely on assumed levels of windfall delivery on small

sites to meet this requirement. Such an approach would be inconsistent with the NPPF which defines windfall sites in its Glossary as “*Sites not specifically identified in the development plan*”. 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.

14. 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 were 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.

Small Sites and SME windfall policy

15. Alongside allocations, the HBF would also encourage the Council to include a policy that is supportive of small sites and SME developers in general. We have attached an example of such a policy that it is proposed to be included in the Medway Local Plan. Policies such as these provide the positive support for such sites and ensures the plan is aligned with the objective paragraph 73 of the NPPF to support SME housebuilders and more specific part d of that paragraph which states that “*support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes*”.

Draft Policy LP13 -Managing Flood Risk

16. Part a of the policy requires all development proposals at risk of flooding to demonstrate that the sequential test has been applied and passed. However, what is not clear in the policy or supporting text is how this applies to development allocated in the local plan than that has already been subject to the sequential test. As the Council will be aware paragraph 180 of the NPPF states “*Where planning applications come forward on sites allocated in the development plan through the sequential test, applicants need not apply the sequential test again*” and HBF would suggest that part a of the policy is amended to:

“Where they have not been allocated in the local plan that the sequential approach and sequential test have been applied and passed, having regard to actual and residual flood risk taking into account the current and future impacts of climate change.”

Draft Policy LP14 Managing Waste Water

17. This policy requires development that needs a new connection to the sewer network, involves a significant increase in flows to the network or a site identified in the water cycle study to demonstrate that there is capacity in waste water treatment and waste water conveyancing to serve the development over its lifetime. HBF do not consider this to be a sound approach as the capacity of sewer network to meet the needs of new development should be addressed through plan making and not through the development management process.
18. 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.”

19. 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.”

20. Consequently, it is inappropriate to include a policy in the local plan requiring development identified in this local plan to demonstrate when applying for planning permission that there is capacity in the sewage network to support the development being proposed. 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 support the development needed in Huntingdonshire, this needs to be disclosed in the Water Resource Management Plan and may be a show stopper preventing this plan from being taken forward.
21. 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.
22. 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.*

23. 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, the is unsound as they require any development that requires a new connection 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 suggests the first section of this policy relating to the sewer network is completely rewritten, recognising that it is the responsibility of the Water Company to ensure sufficient capacity in the network to meet the development needs of Huntingdonshire. Similarly, part f should be deleted as it also seeks to require development to demonstrate capacity in offsite water infrastructure. Developers have paid circa £330 million to Anglian Water since 2020 to support infrastructure enhancements, and the expectation is that there is sufficient capacity within the infrastructure to meet the needs of an area. The Council in partnership with Anglian Water and the EA to ensure that there is sufficient capacity to meet development needs. If that capacity is not available, then the plan must be considered undeliverable.

Draft Policy LP16 Water Efficiency

24. This policy requires development to reduce water use per day to 90 litres per person per day (lppd). This is 20 litres below the minimum optional standard allowed for by planning policy. HBF recognises that there is a need for all new development seek to reduce the amount of water that is used. However, this is most effectively achieved through the application of building regulations and the optional technical standards which are clear as to the level of reduction the Government considers to be necessary in a water stressed area. As there is an existing national standard for such areas then the only sound approach is to apply that standard – which remains 110 lppd. This may change, and our understanding is that the Government are looking at a lower standard for water stressed areas but, in the meantime, the only sound approach is to apply the optional technical standards.

Draft Policy LP 18 Transport, Travel and Connectivity

25. Under the ‘Digital Connectivity’ section the policy states that “... *for development of one or more homes or 100 sqm or more of employment or commercial floorspace must make provision for the physical infrastructure for gigabit-capable full fibre broadband and gigabit-capable connections ...*”. This requirement is unnecessary as Part R volume 1 and volume 2 of the Building Regulations already requires all new dwellings and other buildings to be equipped with gigabit-ready physical infrastructure. HBF would therefore recommend that this paragraph is deleted.

Draft Policy LP26: Supporting Carbon Capture through Nature

26. HBF recognise the need to protect and enhance existing carbon sinks, however and these should be clearly defined on the policies map to ensure that decision makers are aware that arable land – the most prolific land use in the district – is not a carbon sink and, as is noted in paragraph 5.8 of Document F – Offsetting and Sequestering Emissions, is a net emitter of CO₂.

27. In addition, the first sentence of the policy must be amended. At present this would require all development to incorporate each of these elements. While at the end of the policy it does say where appropriate, HBF would suggest that the following approach would deliver improvements in sequestration while providing flexibility as to the most appropriate approach for a particular site. *“Proposals should include measures that support carbon capture such as tree planting, soft landscaping, green roofs, sustainable drainage and green spaces.”*. This avoids the list become a tick box exercise for decision makers and allows the developer to deliver a scheme that incorporates the most appropriate elements of carbon capture for that scheme.

Draft policy LP28 Parking and vehicle movement

28. The policy states that development should comply with design and security guidance in the Huntingdonshire Design Guide. As the Council will be aware, it *should* not seek to confer the weight of a local plan policy on supplementary guidance. As such HBF would suggest that *“comply with”* is replaced with *“have regard to”*.

Draft Policy LP 42 -Promoting a mix of housing

29. This policy provides some flexibility, but HBF would suggest that rather than asking how a development aligns with the relevant evidence they should show how they have had regard to this evidence. Alignment suggests adherence to those documents rather than taking a broader assessment of the evidence and applying it to the site being proposed for development.

Draft Policy 43 Ensuring accessible and adaptable homes

30. Paragraph 7.25 of the Local Plan states that states that there is a need for 669 wheelchair user homes over the plan period – this equates to around 30 wheelchair accessible/ adaptable homes per annum or 2% of annual needs. To meet these needs the Council is proposing to require all development of 10 or more units to provide 5% of homes to part M4(3). However, what is not clear from the Council’s evidence is how many homes will be built to part M4(3) as a result of this policy and whether it is in excess of identified needs. HBF recognise the need to provide homes for wheelchair users, and many will be happy to try and accommodate those needs when requested. However, there is a risk through policies such as this that housebuilders are left with homes built to part M4(3) where there is no demand for such a home. The nature of these homes can be less attractive to households who do not need them, making it harder to sell such homes at full market value, with those who do buy them reconfiguring those homes to better meet their needs. It is therefore important that the Council does not seek to over-provide such homes, which could lead to homes being left empty due to a lack of demand.

Draft Policy LP 44 Facilitating self and custom build homes

31. LP 44 requires development of 100 or more homes to offer 5% of the plots on site for self-builders. However, on the basis of the evidence presented in in the LHNA it is not clear why this policy is needed as it would appear that the needs of self-builders are being met. Table 10.3 in the LHNA shows that there have been 378 home delivered via self-build compared to a need on the register of 283. This would suggest that there the demand for

self-build can be met through windfall development without the need for the Council to place additional burden on house builders.

32. The Council also needs to consider the difficulties in providing self-build plots on new housing developments and how there are coordinated with the development of a wider site. At any one time, there are often multiple contractors and large machinery operating on-site and therefore from both a practical and health and safety perspective, it is difficult to envisage the development of single plots by individuals operating alongside this construction activity. Consideration will need to be given as to the feasibility of developing self-build plots on sites taking into account topography and access and the degree to which self-build and the rest of the site can be developed separately.
33. Finally, the policy states that where self-build plots are not sold after an initial marketing period of 9 months and a subsequent 6 month period then an application may be supported to complete the plots a standard market home. It is not clear why a further 6 months period is necessary after the initial 9 month marketing. If the demand for self-build is considered to be strong, then a 9 month marketing period is sufficient. HBF also objects the statement that applications may be supported. This is too ambiguous. If a plot has not been sold the direction to the decision maker must be that an application to build out the plots a market housing will be supported.
34. In conclusion HBF does not consider this policy to be justified or effective at present. Without further evidence the HBF would suggest that the requirement for development of 100 or more units to deliver a set number of self-build plots is deleted. HBF still considers it necessary for the Council to support and encourage sites to come forward for self-build developers. However, we would also suggest that the Council consider allocating specific sites for self-builders which are more likely to meet the needs of those households as well as avoiding the potentially harmful impacts of mixing the delivery of self-build units alongside commercial housebuilding.

Draft Policy LP 45 Supporting specialist housing

35. This policy states that a proposal including 10 or more self-contained specialist homes will be required to provide affordable housing in line with LP 41. However, the Viability Assessment states in paragraph 12.85 that sheltered and extra care housing is unlikely to be viable. If this is the case, then HBF would not expect to see a requirement for specialist housing to provide any affordable and this requirement should be deleted and replaced with a clear statement that such development will not be required to provide affordable homes. HBF note that paragraph 12.85 in the Viability Assessment indicates that PPG states that the ability of such development to deliver affordable homes should be considered at the development stage. This statement refers to paragraph 10-007 of PPG and refers to development that may vary significantly from the standard models of development. If the Council is to take such an approach, then it should be clear in this policy that affordable housing provision will be considered at the development stage as part of a negotiated settlement.

Draft Policy LP 50 Enhancing Biodiversity and Geodiversity

36. This policy requires all major development to deliver a 20% net gain in biodiversity, compared to the 10%

required by the Environment Act 2021. The exception to this is brownfield within the areas listed in the policy which will not have to provide BNG above the statutory requirements.

37. In considering the soundness of this policy it is necessary to consider paragraph 74-006-20240214 of PPG which states 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”.

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 a very clear and robust justification that the area is significantly worse than the country as whole and that this decline is directly related to the new development rather than, for example, the result of changes in agricultural practices or industrial pollution. It is not sufficiently robust to highlight declines in species that whilst an important issue is not necessarily as a result of new homes being built.

38. However, HBF could not find any justification in the plan or evidence base as to why development in Huntingdonshire should be delivering more than the 10% statutory requirements. The HBF does not disagree that the UK has seen a 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 a significant driver of biodiversity decline in Huntingdonshire.

39. The Council must also be able to show that the 20% net gain is viable and will not compromise the deliverability of sites or the local plan as a whole, and that if it is delivered wholly onsite it would be no material impact on the viability of development. However, what must be recognised by the Council with regard to BNG is that the approach to delivering either a 10% or 20% net gain in biodiversity is type of habitat that is currently on site. On some sites it may be relatively simple to deliver 10% or 20% net gain. These could be on sites where there is minimal biodiversity or where the habitats are or low distinctiveness. However, on some sites this will not be the case. Habitats may be of a higher distinctiveness, and it may be more difficult to deliver BNG on site. In

such cases meeting the 10% will be a challenge and 20% even more so with the likelihood that a significant proportion of the biodiversity units required to achieve 20% net gain will be delivered off site.

40. Where offsite delivery is required, it will mean costs increase due to the spatial risk multiplier. This is noted in the Viability Assessment but seemingly only in relation to statutory credits. However, it applies to all offsite delivery and can see significant increases in the number of units required to achieve BNG. For example, offsite delivery in an adjoining local planning authority or national character area would require would increase the number of biodiversity units required by 1.5 and another part of England by 2. The Viability Assessment notes that offsite delivery for some habitat types range from £25,000 to £35,000. However, the costs can be significantly higher than this with evidence from Biodiversity Units UK shows that they range from £25,000 to £190,000. As such without an understanding of the baseline biodiversity on a site it is difficult to know what impact a 20% BNG requirement will have on viability. Due to this uncertainty HBF would suggest that rather than seek to go beyond the statutory requirement the Council should be working with developers to ensure that 10% can be delivered in a manner that maximises the benefits for local people.
41. The third paragraph in the policy states that where applicant is unable to deliver BNG wholly on site then providing net gain offsite will be required and that this should be within the borough. This I not consistent with national policy which makes no distinction as to where offsite delivery should be made. As highlighted above developers are already incentivised to provide net gains on site or in borough due to the spatial risk multiplier and as such this paragraph is unnecessary and should be deleted.
42. If the 20% requirement is considered to be sound 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.

Monitoring

43. HBF notes the Council have include a monitoring framework in Appendix 2. However, what is missing is what the Council will do should it not meet any of its targets or indicators. Monitoring is only effective where it is clear indicated when, why and how actions will be taken to address any concerns raised through the monitoring of the local plan.

Future Engagement

44. 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.
45. 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

Appendix A – Medway Small Sites and SME Housebuilders policy

Policy T11: Small Sites and SME Housebuilders

The Council seeks to encourage the development of small housing sites that contribute positively to the local community and adhere to sustainable development principles. The Council will support the development of small housing sites in Medway, subject to the following criteria:

- The site must not exceed 60 dwellings (net) in order to maintain the character and scale of the local area.
- Proposed developments must demonstrate high quality architectural design that enhances, or respects the character of the surrounding area and appropriate in scale in relation to the surrounding area.
- All dwellings must meet or exceed the national and local design guidance to ensure a high quality of living for residents.
- Proposed developments must not result in an unacceptable level of harm to residential amenity, designated heritage assets, or environmental resources and biodiversity.
- Developers must provide adequate measures to mitigate any potential impacts on the local environment, such as landscaping and green infrastructure, and make a clear contribution to mitigation and adaptation to climate change.
- Small housing sites should be well-connected to existing infrastructure, including public transportation and local amenities, to promote sustainable living practices.
- The site is not part of a larger site unless, through specific proposals to sub-divide a larger site, to speed up the delivery of homes and includes SME builders as part of that delivery mechanism.
- Weight will be afforded to the delivery of small sites by SME housebuilders coming forward.
- Affordable housing will be delivered in accordance with Policy T3