

Torbay Council  
Town Hall  
Castle Circus  
Torquay  
TQ1 3DR

SENT BY EMAIL  
Future.Planning@torbay.gov.uk  
engagement@torbay.gov.uk  
2<sup>nd</sup> Feb 2026

Dear Planning Policy Team,

## **Torbay (Reg 18) Consultation Dec 2025- Feb 2026**

1. Thank you for consulting with the Home Builders Federation (HBF) on the Torbay Local Plan (Reg 18) Consultation Dec 2025- Jan 2026.
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 includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.
3. HBF welcomes the Council's efforts to ensure that they have an up to date Local Plan. Plan-making is a fundamental part of a Local Authority's role and is essential to support the delivery new homes and jobs. However, we are very concerned about the consequences of the Council's intention to fail to meet the standard method housing requirement for the Torbay area. Government policy has clearly set out the for a significant increase in house building in order to deliver the 1.5 million new homes in this Parliament.
4. The fact that the new standard method results in higher housing requirements in many areas is an important part of that increased delivery and planning for these new homes. Although the constraints facing Torbay are acknowledged and long standing, it is still important that all efforts are made to maximise housing delivery within the Torbay area and clear plans are in place to ensure any unmet needs of the area addressed.

### **Impacts of removal of the legal requirement of Duty to Cooperate**

5. As you will be aware the Government is not saving the Duty to Cooperate (DTC) requirement as a legal test for new Local Plans. However, there is clearly still an expectation that Councils will work together on effective plan-making and there remains a clear expectation that the housing needs of an area will still be met in full. Although compliance with DTC is no longer a legal compliance it is still part of the tests of soundness for the Plan.
6. The DTC section of the draft Plan will need rewriting to reflect the changes to the DTC. The amount of Torbay's unmet needs still needs to be clearly quantified, and it is essential for the Torbay Plan to clearly set out more detail on the issue of unmet housing needs. We note that Teignbridge's soon to adopted new Local Plan includes a requirement to review their housing figures in case of an unmet need being declared by Torbay. Even without the Duty to Cooperate as a legal test, there is clearly

still a requirement for the Torbay Plan to maximise housing provision within the plan area, clearly set out the unmet need that remain, and work with neighboring authorities to ensure that this unmet need is addressed.

### **Impacts of the Dec 2025 NPPF consultation**

7. As you will be aware the Government published its long-awaited proposed revisions to the NPPF for consultation on 16<sup>th</sup> Dec 2025. Whilst this is clearly still consultation it clearly sets out the expectations and direction of travel of the Government. The new NPPF clearly shows the importance that is being placed on addressing the housing crisis and the clear move towards a more rules-based planning system that provides more certainty for everyone. It is very clear that the Government is expecting Local Plan to do more to help to address the housing crisis and there is a clear expectation that all Councils should be planning to meet their housing needs in full.
8. Although in the medium term it is anticipated that sub-regional housing numbers and issues of redistribution of any unmet housing needs where they occur will be addressed through SDSs. However, in the interim it is still essential that work with neighbouring authorities to address unmet needs continues. This is particularly important if Torbay is intending to progress its new Local Plan under the old system, and not under the new 30 month plan-making process that will be brought in later this year. We would encourage the Council to consider this matter carefully.
9. Although we recognise the longstanding challenges and constraints facing Torbay in terms of meeting its housing needs in full, the Council will still need to provide clear and robust evidence of why this is not possible and demonstrate that everything possible has been done to maximise housing delivery within the area. The Local Plan and its evidence base will also need to clearly show the level of unmet need that remains and how this is being addressed through partnership working with neighbouring authorities.
10. HBF also notes the Government's intention to move towards a new more rules-based approach with consistency across standard common matters being provided at the national level. The Dec 2025 NPPF consultation sets out that Local Plans should not include policies on matters already addressed through Building Regulations and other regulatory regimes except when it comes to parking standards and the percentage of homes locally required to meet the accessibility standards M4(3)a and M4(3)b. HBF would therefore strongly encourage the Council to fully consider the scope and content of this Plan. The proposals clearly set out that the Government view is that Local Policies which conflict with the new NPPF will not be able to be taken into account in decision-making. Committing to the development of a suite of Development Management policies that will be replaced and made redundant by the new NPPF may not be the best way to proceed, especially in a time of scarce resources.

## **Chapter 1: Our shared vision - A healthy, happy and prosperous Torbay**

### **Vision and Strategic Priorities**

11. This section may need revisiting to reflect the refocusing of Local Plan on site allocations and matters of local interest, and not reframing or adding to matters already adequately addressed in national policy. HBF would support the aim of ensuring housing needs are met in full as both an objective and a priority for this Plan.

### **Housing Numbers and Environmental Capacity**

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#### **Home Builders Federation**

HBF House, 27 Broadwall, London SE1 9PL  
T: 0207 960 1600 | E: [info@hbf.co.uk](mailto:info@hbf.co.uk) | [hbf.co.uk](http://hbf.co.uk)

Registered in England and Wales. Registered office: HBF House, 27 Broadwall, London SE1 9PL. Company Reg No. 0276 4757 | Vat No. 882 6294 86 | Printed on recycled paper 

12. Although HBF recognise the challenges of meeting housing needs in full within the Torbay area, we are concerned that the Council has already arrived at a figure of 400 homes per year without having updated its evidence base, undertaken a new Call for Sites, or fully explored if there are other policy changes, and indeed funding, which could increase the amount of housing that could be delivered within the Torbay. This is a key requirement of current (and future) national planning policy.
13. We note the recognition that Masterplans for key delivery sites will need updating. We would encourage the Council to set out a clear timetable for this work and use it to fully explore if, and how, the whole range of different housing types, sizes and tenures can be maximised within the regeneration areas. HBF note that much needed family housing can be delivered on brownfield sites but may encounter viability issues, for example if remediation, s106 ask or BNG land take and/or costs are too high.
14. The Sustainability Appraisal will have an important role to play in considering different levels of housing and employment growth for Torbay. This makes it all the more disappointing that the Council is starting from a point of 400 homes per year rather than testing options through the SA, as they are required to do.
15. HBF continues to support the need for more housing in the Torbay area for a variety of reasons including addressing the current housing crisis, meeting housing need, providing affordable housing, to support small and medium house builders and to support employment growth. HBF would request that the Council considers the standard method as only the minimum starting point and fully considers all of the issues that may result in a need for a higher housing requirement, including the need to provide a range and choice of sites, the need for flexibility, viability considerations and whether higher levels of open-market housing are required in order to secure increased delivery of affordable housing.
16. National planning policy is clear that the standard method should be the starting point for establishing the housing requirement. The NPPF also states that the housing requirement may be higher than the identified housing need, if for example, it includes provision for affordable housing and/or to reflect growth ambitions linked to economic development or infrastructure investment. It is important that the correct housing requirement is established before any consideration is given to whether or not all of the housing requirement can be met within the Local Plan's area.

## **Chapter 2: Shaping our places - Local identity and community-led planning.**

17. HBF would note that even if the whole of the National Landscape is excluded from the consideration of any new housing growth, other undeveloped parts of the district can and should still be considered. HBF would wish to see, and comment on, the evidence that supports the conclusion that the full needs of the district cannot be met within its boundaries. Our experience elsewhere has shown such evidence will be subject to very robust testing during the Examination in Public.

**Strategic Policy SS1: Torbay Growth Strategy - Prioritising our communities through improved health, housing, place making and opportunities for all, and Strategic Policy SDP1: Paignton – A strategy for sustainable growth, and Strategic Policy SDB1: Brixham – A strategy for sustainable growth**

18. HBF suggest that the area policies in the Plan should be more explicit about the need to meet the housing needs of Torbay in full. We would also encourage the Council to fully consider the implications of the growth agenda on the future housing needs of Torbay and the wider Bay area.
19. With regards to the Spatial Strategy for Torbay, HBF does not comment on individual sites but we would expect the Plan to set out a logical settlement hierarchy which meets all the housing needs and addresses all areas of the housing market, with a range of sites proposed for allocation. The Plan will need to provide for a wide range of deliverable and developable sites across the area in order to provide competition and choice to ensure that housing needs are met in full, or where this is not possible a clear strategy exists that will deliver any unmet needs elsewhere.
20. HBF note that Council's recognition of the need for Neighbourhood Plans to be updated. We also note that Neighborhood Planning is a voluntary activity. It will be important to clearly set out the timeframe for the preparation of the review of the Neighbourhood Plans, including if and how they are anticipated to contribute to housing delivery in Torbay.

### **Strategic Policy SS1: Torbay Growth Strategy - Prioritising our communities through improved health, housing, place making and opportunities for all**

21. We are also very concerned about the specific policy requirements for all sites suitable for 100 units of housing are required to provide 25% of this as employment space. This seems an unreasonable burden that would place greater emphasis on bringing forward employment than housing, despite the current housing crisis and the requirements for the Council to do all it can towards meeting its housing needs in full. HBF are very concerned that this policy will have a significant impact on the Council's ability to meet the housing needs of Torbay. The policy lacks evidence and justification and there is a lack of detail on how this policy is intended to work in practice. It is also unclear how the 25% is to be calculated or provided. If this is to be an onsite requirement what implications does this have for the housing capacity for each site and how has this been calculated. Is there the option of an off-site contribution. We are very concerned that this policy will render many developments unviable, especially given the requirements to meet other local and national policy requirements such as Biodiversity Net Gain (BNG) which should be delivered on-site wherever possible.
22. Although HBF recognises the importance of employment space, policies requiring new employment land must be proportionate to need. The policy as it currently stands appears to be contrary to the accompanying Sustainability Appraisal that clearly expresses the need for high quality, affordable housing. There is a real risk that it will not be possible for developers to provide the Plans ambition for affordable housing with such a big ask on employment provision.
23. The policy wording is also ambiguous in setting out how the 25% would be applied and clarification is required should the policy remain. It is unclear if the policy would require 25% of the redline site area to be designated employment land or if the requirement is for 25% of the m2 residential accommodation. It is unclear what type of employment is required, and the policy fails to recognise the inherent non-compatibility between some employment uses and residential development. All of this suggests the policy has not been properly thought through to ensure it is effective, justified and deliverable.
24. Similarly, it is unclear if an off-site contribution would be an option to meet the policy requirement. If so, would this be based on job creation or purely site area. HBF are very concerned that the need for employment land to be provided within the site at all times would in practice be extremely difficult

and in some cases, impractical. Not every site is appropriate for employment development, especially where there are topographical or potential access issues.

25. Any off-site contribution would need to be viable to pay and the calculation for it would have to be clearly set out. There needs to be a clear calculation method that can be applied to housing numbers, which must be assessed in the viability work to support the Local Plan. HBF note that the whole plan viability assessment will need to cover the whole Torbay Plan area, but we note that large areas of Torbay suffer significant devaluation, and this is reflected in property values. As such this will affect viability. There are also notoriously difficult geological conditions in the Bay which result in greatly increased abnormal build costs means that development viability is already difficult. Any additional contributions are likely to undermine the likelihood of housing delivery at all. The SA process and the whole plan viability assessment therefore need to robustly test the implications of this policy.

### Chapter 3: Housing and Regeneration Policies

26. HBF agree that meeting the objectively assessed housing needs is an important test of soundness for the Local Plan. Although we are sympathetic to the closely bounded nature of Torbay and the potential for environmental, infrastructure and market capacity to serve as a constraint on meeting the housing need of the area in full, the Council must show it is proactively doing all it can to provide as much housing as within its area.
27. HBF point to Bristol City's Local Plan which is subject to similar constraints of a tightly drawn boundary, and a long established, but not fully quantified unmet housing need. This has created difficulties for the Council at Examination in relation whether it had sufficiently demonstrated how much housing can be delivered in Bristol.
28. In contrast Leicester City, which is also a city whose urban area goes beyond the City Council boundary engaged in constructive dialogues with the neighbouring authorities in Leicester and Leicestershire. The unmet need was quantified and a clearly established an agreement was reached on a distribution of that unmet need amongst the neighbouring authorities. This is how good spatial planning is intended to work, and despite the changes to the legal requirement for DTC, HBF would suggest that this approach represents a sensible way to plan for the unmet need of Torbay in advance of an SDS under the new system.
29. HBF appreciate the challenges facing Torbay that may mean that it is not able to accommodate its full Local Housing Need as calculated by the December 2024 Standard Method (which at Autumn 2025 is 950 dwellings a year). However we are concerned that planning for less than half of the requirement of the standard method is unlikely to meet the test of soundness or be justified. The Government is committed to delivering 1.5 million new homes within this Parliament. The Council will need to be provide clear evidence that the Plan has is doing all it can to deliver the significant uptick in housing delivery expected by the changes to the standard method. HFB would strongly suggest that ruling out all new major new greenfield development unless brought forward through Neighbourhood Plan is simply not an appropriate way to proceed, when this would leave should a large portion of Torbay's housing need unmet.
30. The Plan will need to include a clear, robust and realistic housing trajectory which demonstrates a sufficient supply of new homes over the plan period, and for the Council to demonstrate that it can achieve and maintain a five year supply of deliverable housing land across the lifetime of the Local Plan (in line with paragraph 78 of the current NPPF and Policy HO3 of the emerging NPPF).

31. The Council should also set out in the Plan's policies and evidence base to set out how the plan will deliver 10% of homes on sites of less than one hectare, as required by the current NPPF. Indeed, HBF would advocate that a higher percentage of small sites are allocated if possible. Such sites are important for encouraging the growth in SME housebuilders who will tend to develop these sites but rarely see the benefits that arise from the allocation of sites in a local plan. Up until the 1980s, small developers once accounted for the construction of half of all homes built in this country resulting in greater variety of product, more competition, and faster build-out rates. Since then, the number of small companies has fallen by 80%. There is no reason some of these sites could not be within the national landscape.
32. HBF note that support for small and medium builders need not be limited to only small sites of less than 1Ha. SMEs also deliver on other types of non-strategic sites (for example up to 100 units). The inclusion of a range of sites including non-strategic allocations could be used to expand the range of choice in the market and be of a scale that can come forward and make a contribution to housing numbers earlier in the plan period.
33. The current NPPF consultation is looking to extend this requirement to medium sites, and is more explicit that it intends that this national policy requirement to be delivered through allocations (not windfalls or any other means). HBF would encourage the Council to fully consider the implications of this clear direction from Government on the policies and site allocations in this Torbay Plan 2025-2045.
34. The failure of this Plan to plan properly for the full housing needs of Torbay is contrary to national planning policy. A point is further underlined by the clear direction of travel set out in the new NPPF consultation. The plan needs to meet its housing needs in full, or set out very clearly how they will be met in some other way.

## **Chapter 7: Building for the future - Resilient and smart infrastructure and developer Contributions**

35. The Infrastructure Delivery Plan will be an important part of the evidence base in support of the Torbay Local Plan. HBF would welcome the opportunity to comment on it once it is available. The need to deliver new infrastructure requirements in a way that is financially viability adds further support to the need for the Plan to be planning for more homes, and the need for close cross-boundary working especially around new housing development and infrastructure.
36. The wording of Policy INS: Sustainable Infrastructure does not make it clear how a developer would show compliance with the Policy, and seems to potentially be in conflict with Policy IN1 which recognises not all the infrastructure requests being sought by the Council may be able to be provided by the developers for reasons of viability, and therefore a prioritisation for contributions is set out. It is also unclear how the CIL payments would impact the other requirements of this policy. It will be important to avoid any double dipping.
37. Strategic Policy IN1: Prioritisation of planning obligations needs to refer to the national mandatory requirement for the provision of BNG on eligible sites. This is set out under the Environment Act and is non-negotiable.
38. HBF note that the Government (via DEFRA) recently undertook a consultation on potential revisions to the national BNG requirement and is now proposing sites under 0.2 Ha are exempt from BNG.

Further work on other possible improvements to the working of the policy in practice are ongoing and it will be important that the Plan's policy on this issue is kept under review.

39. The current NPPF (Dec 2025) consultation indicates that the only time where it may be appropriate to seek more than 10% BNG through local policy relates to allocations, and even then only where this is clearly evidenced and justified.
40. HBF note that Viability is an important consideration. We would welcome the opportunity to review and comment on the Whole Plan Viability Assessment that is being prepared as part of the Plan preparation, once it is available.
41. Whole Plan viability testing is an important part of the plan-making process. However, as noted in PPG assessing the viability of plans does not require individual testing of every site or assurance that individual sites are viable. Flexibility should be included within this policy because whole plan viability assessments use methodologies that test typologies of sites, which do not consider the detailed circumstances of individual sites. As such there may be individual sites that are already not viable, for example if the costs or values of a specific site fall outside the parameters used of a typology that was tested. Some sites will be on the very margins of viability and other sites may already be unviable even without a change of circumstances. Therefore, the policy needs flexibility to ensure it is justified and effective, and the Plan is deliverable.
42. HBF welcomes the Council's recognition of the viability challenges they may face as a lower value area and the intention behind Policy IN1. However, we also note the Council's intention to update the 2022 Planning Contributions and Affordable Housing Supplementary Planning Document (SPD) to support the Local Plan. No timeframe has been provided for this work. It is noted that the opportunity to prepare SPDs does not form part of the new plan-making system.

## **Chapter 8: Climate Change - Our sustainable and resilient future**

43. As highlighted earlier HBF would question the range and scope of this Chapter especially in light of the proposed new approach to Local Plan content set out in the current Dec 2025 NPPF consultation. It will be important for this suite of policies to be fully evidenced and justified and not repeat national policy. Government has made its intention clear that the once the new (Dec 2025) NPPF is in place policies in Local Plans that duplicate or conflict with it will no longer be relevant for decision-making. This is likely to require the Council to rethink its approach to the detailed DM policies being proposed in this Plan.
44. Although HBF recognises the role that developers can play in helping to mitigate and address climate change and increase energy efficiency we would caution against policies that seek to go further and faster than national legislation and policy changes. This would lead to the creation of a patchwork of differing local policies which could inadvertently undermine the delivery of the wider environmental objectives the Council is seeking and create unnecessary delays to much needed new housing.
45. HBF does not consider that the Council setting its own standards is the appropriate. We are concerned about Councils adding to the complexity of policy, regulations and standards that housebuilders are already expected to comply with. The key to success is standardisation and avoidance of individual Councils specifying their own policy approach, which undermines economies of scale for

product manufacturers, suppliers and developers. The impact of these cumulative local requirements along with others Section 106 asks may have considerable viability implication and may lead to the non-delivery homes and needs to be fully considered within the Viability Assessment.

46. HBF do not support Local Plan policies on matters that are already addressed by Building Regulations and other regulatory regimes. A plethora of local standards can actually undermine the objectives the Council is seeking to achieve, for example by seeking to introduce uncertainty and variability to the timetable for the introduction of the national Future Homes Standard.
47. We also note that reference is made in this chapter to several Supplementary Planning Document (SPD) that the Council intends to prepare to provide further Guidance on the policies in this Chapter, and again no timeframe has been provided for this work. The opportunity to prepare SPDs does not form part of the new plan-making system.

### **Chapter 9: Our Natural Places - Protecting and enhancing Torbay's countryside, landscape and natural environment**

48. As highlighted earlier HBF would question the range and scope of this Chapter especially in light of the proposed new approach to Local Plan content set out in the current Dec 2025 NPPF consultation. It will be important for this suite of policies to be fully evidenced and justified and do not repeat national policy.
49. In light of the housing crisis and the need for the Council to clearly evidence it is trying to do all it can to meet its own housing need within its boundary, there will be a need to consider green field allocations, and this is likely to require a comprehensive review of strategic gaps and countryside to see if they could in fact accommodate some housing.
50. HBF strongly support the need for more housing in Torbay variety of reasons including addressing the current housing crisis, meeting housing need, providing affordable housing, to support small and medium house builders and to support employment growth. The Council should set its housing requirement as planning to meet the standard method as a very minimum. Indeed, HBF would request that the Council considers all of the issues that may result in a need for a higher housing requirement, including the need to provide a range and choice of sites, the need for flexibility, viability considerations and whether higher levels of open-market housing are required in order to secure increased delivery of affordable housing, as such the need for housing will need to be balanced against environmental protection policies.
51. The Plan needs to be clear how all the natural environment policies are intended to work together. For example, how does the requirement for the 10% national mandatory Biodiversity Net Gain for work with the other proposed policies on protecting trees and hedgerows and woodland. It is unclear if and how the Devon Hedge Guidance compliments or conflicts with the BNG metric. Similarly, how does mandatory BNG work with the policies on Blue and Green Infrastructure?

### **Chapter 11: Designed with quality - Taking pride in Torbay's place-making**

52. We suggest there is a need for fundamental rethink of this Plan and a return to the principles of positive and effective plan-making where the purpose of the Local Plan is to set out how, not if, the housing requirement for the district can be met. To do otherwise, is to do a disservice to your local communities.

53. In our view the Council's assertion at this stage that the Plan should plan for only 400 of the 950 homes per annum needed is untenable. Even under the transitional arrangements Councils who had reached Reg 19 by 12 March 2024 (which we recognise does not apply to this Plan) and had a Plan that did not deliver at least 80% of the housing standard method would not be allowed to proceed.
54. There is a national policy requirement for the Plan to consider how it can meet the housing needs of the area in full. The purpose of the Plan should be to set out policies and allocations that ensure the development that is needed will be sustainable and that any impacts of this much needed new housing are effectively managed including through any specific policy provisions for the allocations, securing the delivery of infrastructure, and ensuring policy requirements are deliverable through robust whole plan viability testing. The plan needs to meet its housing needs in full, or set out very clearly how they will be met in some other way.
55. This will impact on design, density and place-making. Good design does not have to reflect the existing character of a place, new development it can be an agent of change. Current planning policy and the new NPPF clearly set out expectation that density should be maximized. Housing densities are impacted by a number of factors including house types and sizes, on-site policy requirements should as on-site BNG and SUDs. There is therefore a need to consider density both from a wider policy perspective and on a site by site basis for allocation. National planning requires that the Council fully explores all options to meet their housing needs before concluding it cannot. Further work on tall buildings, densification, another Call for Sites, and more urban regeneration work and will be needed.

### **The need for a Plan Review policy and a Monitoring Framework**

56. There is clear need for a Monitoring Framework to be an integral part of the Torbay Plan. If this Plan were to proceed and deliver less than half of its housing, it would be required to include a policy for immediate review. This however does little to address the current unmet housing needs and HBF would support ongoing partnership working with neighbouring authorities. However, a policy is still needed to ensure a plan review is undertaken and that it is done in a timely manner.
57. As set out in our comments above HBF believes that failing to plan for the housing needed in Torbay and the wider Bay area in the round is unsustainable. The Torbay Local Plan should be properly planning for more housing both up to 2043 and beyond.

### **Overall Conclusions**

58. HBF agree with the Government's expectation that housing need of an area should be met in full. Despite the constrained nature of Torbay and the existence of a protected landscapes there is a need to do more to show all options to meet housing needs have been fully explored. We note that the existence of environmental designations within other planning authorities' areas have not found this to be a barrier to them planning to meet their housing needs in full.
59. As this Plan is not proceeding under the transitional arrangements it will be assessed against the Dec 2024 NPPF. This clearly states in para 61 that "To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are

addressed and that land with permission is developed without unnecessary delay” The overall aim of the Plan should be to meet an area’s identified housing need, including with an appropriate mix of housing types for the local community.

60. HBF are strongly of the view that the Torbay Local Plan and its Development Strategy requires a significant rethink. More housing is required and this could, and should, impact on the Development Strategy. The Council to fully consider all the implications of the current NPPF (Dec 2025) consultation and the clear direction of travel that signified in terms of plan-making, and more immediately in relation to Development Management Policies.
61. The standard method housing requirement has always been the minimum starting point for setting the housing requirement, and HBF support more housing than the standard method housing requirement in order to support economic growth, provide a range and type of sites and to support small and medium house builders.
62. There is clearly a need to provide a range and choice of sites, a need for flexibility and viability considerations and many others issues that will need to be taken into account. The requirement to meet its housing numbers in full and this should be the starting point of this Plan, and there is limited value in providing detailed further comments on other issues and policies when the basic tenant of the Plan is wrong and such fundamental changes, including an increase to the amount of housing will be needed. The Torbay Plan needs to meet its housing needs in full, or set out very clearly how they will be met in some other way.

### Future Engagement

63. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
64. 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,



Rachel Danemann MRTPI CIHCM AssocRICS  
Planning Manager – Local Plans (Midlands and South West)  
Home Builders Federation  
Email: [rachel.danemann@hbf.co.uk](mailto:rachel.danemann@hbf.co.uk)  
Phone: 07817865534