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15 November 2019

Dear Sir / Madam

## **SOUTH NORTHAMPTONSHIRE LOCAL PLAN PART 2 (LPP2) MAIN MODIFICATIONS CONSULTATION**

### **Introduction**

Thank you for consulting with the Home Builders Federation (HBF) on the above-mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following representations to the South Northamptonshire LPP2 Main Modifications consultation.

### **MOD033 to Policy LH8 : Affordable Housing Bullet Point (3)**

**MOD033** is not consistent with para 64 of 2019 NPPF which states :-

"Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership (as part of the overall affordable housing contribution from the site), unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups".

**MOD033** states that the Council will seek to an affordable housing tenure split of 75% social / affordable rented provision and 25% other affordable routes to home ownership of which 10% are to be available for discounted market sales housing. This proposed affordable housing tenure split will not result in at least 10% affordable home ownership as set out in 2019 NPPF (para 64). For **Policy LH8** to be consistent with national policy **MOD033** should be expressed as follows :-



- 50% affordable housing of which 25% is affordable home ownership and 75% is affordable / social rent ;
- 40% affordable housing of which 25% is affordable home ownership and 75% is affordable / social rent ;
- 25% affordable housing of which 40% is affordable home ownership and 60% is affordable / social rent.

As proposed **MOD033** is not consistent with national policy. **MOD033** should be subject to further modification.

### **MOD069 & MOD070 to Policy INF4 : Electric Vehicle Charging Points (EVCP) Bullet Points (1) & (2)**

Under **MOD069** and **MOD070 Policy INF4** is modified to ensure its continued operation by recognising technological advances. **MOD069 to Policy INF4 Bullet Point (1)** requires that all dwellings with a garage or driveway have AC Level 2 (or equipment providing for no lesser standard of efficiency) EVCPs and **MOD070 to Bullet Point (2)** requires on residential developments of 10 or more dwellings with communal parking areas AC Level 2 equipment (or equipment providing for no lesser standard of efficiency) EVCPs for every 10 dwellings.

The HBF is supportive of encouragement for the use of electric and hybrid vehicles via a national standardised approach implemented through the Building Regulations to ensure a consistent approach to future proofing the housing stock. Recently the Department for Transport held (ended on 7<sup>th</sup> October 2019) a consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings.

This consultation set out the Government's preferred option to introduce a new functional requirement under Schedule 1 to the Building Regulations 2010, which is expected to come into force in the first half of 2020. The inclusion of EVCP requirements within the Building Regulations 2010 will introduce a standardised consistent approach to EVCP in new buildings across the country. The requirements proposed apply to car parking spaces in or adjacent to buildings and the intention is for there to be one charge point per dwelling rather than per parking space. It is proposed that charging points must be at least Mode 3 or equivalent with a minimum power rating output of 7kW (expected increases in battery sizes and technology developments may make charge points less than 7 kW obsolete for future car models, 7 kW is considered a sufficiently future-proofed standard for home charging) fitted with a universal socket to charge all types of electric vehicle currently on the market and meet relevant safety requirements. All charge points installed under the Building Regulations should be un-tethered and the location must comply with the Equality Act 2010 and the accessibility requirements set out in the Building Regulations Part M.

The Government has estimated installation of such charging points add on an additional cost of approximately £976. The Council's viability evidence set out in LPP2 Viability Review by Montagu Evans dated October 2018 (LP2EVVIA-

1) has not cost allowances for EVCP (see commentary on page 29 & Appendix A Key Appraisal Assumptions). As such costs have not been viability tested by the Council there may be an adverse impact on housing delivery.

The Government has also recognised the possible impact on housing supply, where the requirements are not technically feasible. The Government's recent consultation proposed introducing exemptions for such developments.

The costs of installing the cables and the charge point hardware will vary considerably based on site-specific conditions in relation to the local grid. The introduction of EVCPs in new buildings will impact on the electricity demand from these buildings especially for multi-dwelling buildings. A requirement for large numbers of EVCPs will require a larger connection to the development and will introduce a power supply requirement, which may otherwise not be needed. The level of upgrade needed is dependent on the capacity available in the local network resulting in additional costs in relation to charge point instalment. The Government recognises that the cost of installing charge points will be higher in areas where significant electrical capacity reinforcements are needed. In certain cases, the need to install charge points could necessitate significant grid upgrades which will be costly for the developer. Some costs would also fall on the distribution network operator. Any potential negative impact on housing supply should be mitigated with an appropriate exemption from the charge point installation requirement based on the grid connection cost. The consultation proposes that the threshold for the exemption is set at £3,600. In the instances when this cost is exceptionally high, and likely to make developments unviable, it is the Government's view that the EVCP requirements should not apply and only the minimum Energy Performance of Buildings Directive requirements should be applied.

It is the HBF's opinion that the Council should not be getting ahead of Government proposals for Building Regulations. Furthermore, the Council has not recognised the technical feasibility and viability impacts as identified by the Government. **Policy INF4** should be deleted. If retained **Policy INF4** should be modified to allow exceptions if not technically feasible or viable.

## Conclusion

It is hoped that these representations will be helpful to both the Council and the Inspector in preparing the final stages of the South Northamptonshire LPP2. In the meantime, if any further assistance or information is required please contact the undersigned.

Yours faithfully  
for and on behalf of **HBF**



**Susan E Green MRTPI**  
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