

Planning Policy Team
Mansfield District Council
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SENT BY E-MAIL ONLY TO
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10 December 2019

Dear Sir / Madam

MANSFIELD LOCAL PLAN 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 Mansfield Local Plan Main Modifications consultation.

MM82 to Policy IN9 : Car & Cycle Parking

MM82 to Policy IN9 is modified so that development "meets the minimum standards and design requirements set out in The Nottinghamshire Highway Design Guide".

This modification is unsound. The Council should not require development to meet the standards and design requirements of the Nottinghamshire Highway Design Guide because these standards and guidance have not been subject to examination and do not form part of the Plan. The Council should not convey the weight of a Development Planning Document onto a Design Guide. This proposed modification should be removed from **Policy IN9**. If it is re-inserted into supporting text, the Council should be stating that development proposals should have regard to the Highway Authority's standards and guidance.

M82 to Policy IN9 also modifies the requirement for inclusion of electric car charging provision appropriate to the scale and use of the proposed development.



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 7th 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 Whole Plan Viability Appraisal Update dated December 2018 by Keppie Massie (Document V2) only included an allowance of £250 per dwelling for an Electric Vehicle Charging Point based on 32 amp radial spur with isolator.

The Government has also recognised the possible impact on housing supply, where the requirements are not technically feasible. The Government's 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 IN9** should be deleted. If retained **Policy IN9** 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 Mansfield Local Plan. In the meantime, if any further assistance or information is required please contact the undersigned.

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

A handwritten signature in blue ink, appearing to read 'Susan E Green', is positioned above the printed name.

Susan E Green MRTPI
Planning Manager – Local Plans