

Plans, Policies and Place-Making Team
Charnwood Borough Council
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Dear Sir / Madam

CHARNWOOD LOCAL PLAN - PREFERRED OPTIONS CONSULTATION

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 responses to specific questions in the Council's consultation document.

Question 3.

Do you agree that we should pursue a low growth rather than a high growth scenario? Does planning for an additional 1,300 homes above what is required to meet our needs strike the right balance between ensuring there is flexibility in the plan and protecting our environment? If not, what alternative approach would you suggest and why?

As set out in the 2019 National Planning Policy Framework (NPPF) the determination of the minimum number of homes needed should be informed by Local Housing Needs (LHN) assessment using the Government's standard methodology unless exceptional circumstances justify an alternative approach (para 60). The standard methodology is set out in the updated National Planning Practice Guidance (NPPG). The Council's LHN assessment for Charnwood of 18,394 dwellings (1,082 dwellings per annum) between 2019 – 2036 calculated using 2014-based SNHP, 2018 as the current year and 2018-based affordability ratio is mathematically correct.

As set out in the NPPG the LHN figure is calculated at the start of the plan-making process however this number should be kept under review and revised when appropriate (ID 2a-008-20190220). The LHN figure may change as inputs are variable and this should be taken into consideration.



The Council's proposed low growth scenario based on LHN assessment is only a minimum starting point. The Government's objective of significantly boosting the supply of homes remains. Any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere may necessitate a housing requirement figure above LHN. It is important that the housing needs of the Borough are not under-estimated.

The Council latest evidence of affordable housing need is 384 dwellings per annum which is a significant increase on the need previously identified in the adopted Core Strategy. The NPPG states that total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments. An increase in the total housing figures may be considered where it could help deliver affordable housing (ID : 2a-024-20190220).

Charnwood is also part of the Leicester & Leicestershire Housing Market Area (L&LHMA). It is known that City of Leicester will have unmet housing needs. It is understood that Leicester City Council will be consulting on its Draft Local Plan in January / February 2020. This consultation will identify a shortfall of 7,813 dwellings to 2036 to be re-distributed through agreements with adjacent District Councils. The Council states that the Leicester & Leicestershire Strategic Growth Plan (L&LSGP) sets out a re-distribution of unmet housing needs, which does not affect Charnwood. The HBF noted that the L&LSGP is a non-statutory document, which has not been subject to scrutiny at an examination. The HBF also understand that the non-statutory L&LSGP states that "the agreed distribution for the period 2011 – 2036 will be set out in a Memorandum of Understanding (MoU) which will be used as the basis for preparing or reviewing Local Plans with 2036 as an end date". This MoU has not yet been produced. The end date of the Charnwood Local Plan is 2036 as the L&LSGP cannot be relied upon until after 2036 this strategic matter must be addressed by the Council.

To fully meet the legal requirements of the Duty to Co-operate the Council should engage on a constructive, active and on-going basis with other L&LHMA authorities to maximise the effectiveness of plan making. The Charnwood Local Plan should be prepared through joint working on cross boundary issues. A key element of Local Plan Examination is ensuring that there is certainty through formal agreements that an effective strategy is in place to deal with strategic matters when Local Plans are adopted. As set out in the 2019 NPPF (paras 24, 26 & 27) the Council should provide a signed Statement of Common Ground (SoCG) between itself and other L&LHMA authorities. The Plan should be based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred as evidenced by a SoCG (para 35c).

The NPPG sets out that authorities should have a SoCG available on their website by the time of publication of the Draft Plan, in order to provide communities and other stakeholders with a transparent picture of collaboration and once published, authorities will need to ensure that any SoCG continues to reflect the most up-to-date position of joint working (ID : 61-020-20190315). It

is vital that the Council agree a SoCG with other L&LHMAs authorities, which sets out an agreed position on housing needs and the meeting of any unmet needs arising from the city of Leicester up to 2036. A SoCG should be provided by the Council by the next consultation stage of preparation of the Local Plan. The HBF may wish to submit further representations on the Council's compliance with the Duty to Co-operate in later consultations.

The Council should pursue a housing growth scenario, which meets housing needs in full based on an up to date LHN for the Borough, affordable housing needs and an agreed re-distribution of unmet needs from Leicester City between 2019 - 2036.

The Council's current Housing Land Supply (HLS) comprises :-

- North East Leicester Sustainable Urban Extension (SUE) for 3,325 dwellings ;
- West of Loughborough SUE for 3,200 dwellings ;
- North of Birstall SUE for 1,950 dwellings ;
- Other consents for 3,949 dwellings ;
- Saved 2004 allocation for 40 dwellings ;
- Total of 14,464 dwellings

Therefore 5,930 dwellings are to be found to meet the LHN starting point. The Council is also proposing provision of an element of flexibility with 1,300 additional dwellings giving a total overall HLS of 19,716 dwellings.

It is agreed that a flexibility contingency should be applied to the overall HLS so that the housing requirement is treated as a minimum rather than a maximum. The HBF acknowledge that there can be no numerical formula to determine the appropriate quantum for a surplus but greater numerical flexibility is necessary if a Local Plan is highly dependent upon one or relatively few large strategic sites as is the case in Charnwood and / or specific settlements / localities rather than if HLS is more diversified. The HBF always suggests as large a contingency as possible to maximise flexibility in order to respond quickly to changing circumstances, maintain a 5 YHLS and create choice and competition in the land market. A contingency of only 7% (1,300 dwellings) as proposed by the Council is not considered significant nor sufficient.

Question 4.

Do you agree with our preferred development strategy and the way it allocates development to different parts of the Borough? If not, what alternative distribution would you suggest and why?

The preferred development strategy is urban concentration and intensification with some growth dispersed to other areas of the Borough.

It is important that the spatial distribution of development meets the housing needs of both urban and rural communities (also see answer to Question 6

below). The 2019 NPPF states that *“in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs”* (para 77) and concludes that *“to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services”* (para 78). For rural communities, housing affordability can be acute. In Charnwood Borough, the median house price to median earnings ratio has more than doubled increasing from 3.19 in 1997 to 7.23 in 2018 however these Borough-wide figures may disguise even more acute housing affordability in rural areas.

Furthermore, all households should have access to different types of dwellings to meet their housing needs. When planning for an acceptable mix of dwellings types to meet people’s housing needs the Council’s focus should be ensuring that appropriate sites are allocated to meet the needs of specifically identified groups. The Local Plan should ensure that suitable sites are available for a wide range of types of development across a wide choice of appropriate locations.

Question 5.

How do you think we can best achieve our aspiration of delivering 10% of new homes on small sites of 1ha or less?

The HLS should include a short and long-term supply of sites by the identification of both strategic and non-strategic allocations for residential development. Housing delivery is optimised where a wide mix of sites is provided therefore SUEs should be complimented by smaller non-strategic sites. The widest possible range of sites by both size and market location are required so that small, medium and large housebuilding companies have access to suitable land to offer the widest possible range of products. A mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.

Under the 2019 NPPF, the Council should identify at least 10% of the housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 68). For Charnwood 10% of the proposed low housing growth scenario is 1,839 dwellings. It is unclear how many allocated sites in Draft Policy LP3 are less than 1 hectare. If this is less than 10% the Council should ensure that the Local Plan is consistent with national policy. The identification of small sites should not be deferred to Neighbourhood Plans.

Question 6.

Do you have any comments on Draft Policy LP1? If you don’t agree with the proposed policy please set out why and what alternative approach would you suggest? Do you think we have missed something?

Draft Policy LP1 – Development Strategy makes provision for at least 19,716 dwellings between 2019 and 2036. The pattern of development for new housing in the spatial strategy is as follows :-

- Leicester Urban Area (Birstall, Syston, Thurmaston) - 7,056 dwellings (36%) ;
- Loughborough Urban Centre - 6,331 dwellings (32%) ;
- Shepshed Urban Area - 2,871 dwellings (15%) ;
- Service Centres (Anstey, Barrow upon Soar, Mountsorrel, Quorn, Rothley, Sileby) - 2,490 dwellings (13%) ;
- Other Settlements - 945 dwellings (5%) ; and
- Small Villages and Hamlets - 23 dwellings (0.1%).

The preferred development strategy distributes 16,258 dwellings (83%) to urban area and 3,458 dwellings (18%) to the rural area. New residential development is also confined to allocations and land within Limits to Development boundaries (also see answers to Questions 3 and 4 above).

In Draft Policy LP1 there is no distinction between housing requirement and HLS, which is confusing. The policy should be clearer.

Furthermore, if there is a proven shortfall in housing delivery, the Council should be supporting proposals for sustainable development under the presumption in favour in accordance with national policy.

Question 8.

Do you think these are the right sites? If not, what changes or alternative sites would you propose?

Draft Policy LP3 – Housing Sites identifies 73 sites for allocation for housing following a process informed by the preferred strategy and sustainability appraisal.

The HBF submit no comments on the merits or otherwise of individual strategic / non-strategic sites proposed for allocation. Our responses to this consultation are submitted without prejudice to any comments made by other parties.

It is noted that there is no housing trajectory. This omission from the Local Plan is inconsistent with the 2019 NPPF. A housing trajectory should be incorporated together with supporting evidence justifying the Council's assumptions on lapse rates, windfall allowances, lead in times and delivery rates in the housing trajectory. The HBF may wish to make further representations on the Council's housing trajectory and supporting evidence in representations to later consultations.

Question 9.

Do you have any comments on Draft Policy LP4? If you don't agree with the proposed policy please set out why and what alternative approach would you suggest? Do you think we have missed something?

Draft Policy LP4 - Affordable Housing seeks 30% affordable housing from housing developments of 10 or more dwellings, which will not normally be sought from sheltered or extra care housing schemes. A clear justification supported by an independent viability assessment will be required if an applicant considers that circumstances justify the need for a different level of provision.

It is noted that Draft Policy LP4 is inconsistent with the Council's own statement that evidence identifies that it is not viable for sheltered or extra care housing to provide affordable housing and are excluded from the requirement to do so (see para 5.23). This inconsistency should be corrected.

The Local Plan should set out the contributions expected from development including the level and types of affordable housing provision required and other infrastructure for education, health, transport, flood & water management, open space, digital communication, etc. As set out in the 2019 NPPF such policy requirements should not undermine the deliverability of the Local Plan (para 34). It is important that the Council understands and tests the influence of all inputs on viability as this determines if land is released for development and if development is financially viable. Viability assessment is highly sensitive to changes in its inputs whereby an adjustment or an error in any one assumption can have a significant impact on the viability or otherwise of development. The cumulative impact of provision of infrastructure, other contributions and compliance with policy requirements should be set so that most sites are deliverable without further viability assessment negotiations (para 57). The HBF may submit further comments on whole plan viability in representations to later consultations.

There should also be further clarification in Draft Policy LP4 and / or the supporting text regarding consistency with 2019 NPPF (para 64) on affordable housing definitions and affordable housing tenure mix.

Question 11.

Do you have any comments on Draft Policy LP6? If you don't agree with the proposed policy please set out why and what alternative approach would you suggest? Do you think we have missed something?

Draft Policy LP6 - Housing Mix seeks at least 5% of all new dwellings to be Building Regulations Part M Category 2 or 3 properties to meet the needs of the ageing population.

The 2019 NPPF states that policies should be clearly written and unambiguous so that a decision maker knows how to react to a development proposal (para 16d). Draft Policy LP6 is too ambiguous on the provision of M4(2) and /or M4(3)

compliant homes sought as part of the mix of housing on new housing developments. If this policy is to be effective the Council should provide further clarification of its requirements, which should be justified by supporting evidence.

If the Council wishes to adopt the optional standards for M4(2) and / or M4(3) then this should only be done in accordance with the 2019 NPPF (para 127f & Footnote 46) and the NPPG. Footnote 46 states *“that planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing where this would address an identified need for such properties”*. As set out in the 2019 NPPF all policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). The NPPG sets out the evidence necessary to justify a policy requirement for M4(2) and / or M4(3) standards. The Council should apply the criteria set out in the NPPG (ID 56-005-20150327 to 56-011-20150327) to ensure that an appropriate evidence base is available to support any proposed policy requirements.

All new homes are built to Building Regulation Part M Category 1 (M4(1)) standards which include level approach routes, accessible front door thresholds, wider internal doorway and corridor widths, switches and sockets at accessible heights and downstairs toilet facilities usable by wheelchair users. These standards are not usually available in the older existing housing stock and benefit less able-bodied occupants. The optional standards should only be introduced on a “need to have” rather than a “nice to have” basis. Need is generally defined as *“requiring something because it is essential or very important rather than just desirable”*. If the Government had intended that evidence of an ageing population alone justified adoption of optional standards then such standards would have been incorporated as mandatory in the Building Regulations, which is not the case. M4(1) standards are likely to be suitable for most residents.

In determining the quantum of M4(2) and / or M4(3) homes, the Council should focus on the ageing population living in the Borough compared to national / regional figures and the proportion of households living in newly built homes. Many older people already live in the Borough and are unlikely to move home. There may be a need for some new dwellings to be built to optional technical standards especially specialist housing but not all existing older residents will move home and those that do move may not choose to live in a new dwelling. The under-occupancy of new family homes by older people or individuals runs at odds with the aim of making the best use of the housing stock.

The NPPG sets out that evidence should include identification of :-

- the likely future need ;
- the size, location, type and quality of dwellings needed ;
- the accessibility and adaptability of the existing stock ;
- variations in needs across different housing tenures : and

- viability.

Any policy requirement for provision of M4(2) and / or M4(3) dwellings should be viability assessed. There are substantial cost differences between M4(2) and M4(3) compliant homes. In September 2014, the Government's Housing Standards Review included cost estimates by EC Harris which were £1,646 per apartment and £2,447 per house for M4(2) and £15,691 per apartment and £26,816 per house for M4(3). The Council's own viability testing should include such costs plus any inflationary cost increases since 2014.

The Council is also reminded that the requirement for M4(3) should only be required for dwellings over which the Council has housing nomination rights as set out in the NPPG (ID 56-008-20150327).

In Draft Policy LP6, there is no reference to site exceptions due to site-specific constraints such as flooding, gradients, etc, which should be incorporated.

Question 12.

Do you have any comments on Draft Policy LP7? If you don't agree with the proposed policy please set out why and what alternative approach would you suggest? Do you think we have missed something?

Draft Policy LP7 - Space Standards of Residential Properties expects all new residential dwellings to meet the Nationally Described Space Standards (NDSS).

If the Council wishes to adopt the optional NDSS then this should only be done in accordance with the 2019 NPPF (para 127f & Footnote 46). Footnote 46 states that "*policies may also make use of the NDSS where the need for an internal space standard can be justified*". As set out in the 2019 NPPF all policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). The NPPG sets out that "*Where a need for internal space standards is identified, the authority should provide justification for requiring internal space policies. Authorities should take account of the following areas need, viability and timing*" (ID: 56-020-20150327). Before adopting the NDSS, the Council should provide a local assessment evidencing the case for Charnwood. If it had been the Government's intention that generic statements justified adoption of the NDSS then the standard would have been incorporated as mandatory in the Building Regulations, which is not the case.

The NDSS should only be introduced on a "need to have" rather than a "nice to have" basis. Need is generally defined as "*requiring something because it is essential or very important rather than just desirable*". The identification of a need for the NDSS must be more than simply stating that in some cases the standard has not been met it should identify the harm caused or may be caused in the future.

The HBF is not aware of any evidence that market dwellings not meeting the NDSS have not sold or that those living in these dwellings consider that their housing needs are not met. There is no evidence that the size of houses built are considered inappropriate by purchasers or dwellings that do not meet the NDSS are selling less well in comparison with other dwellings. The HBF in partnership with National House Building Council (NHBC) undertake an annual independently verified National New Homes Customer Satisfaction Survey. The 2018 Survey demonstrates that 90% of new home buyers would purchase a new build home again and 87% would recommend their housebuilder to a friend. The results also conclude that 93% of respondents were happy with the internal design of their new home, which does not suggest that significant numbers of new home buyers are looking for different layouts or house sizes to that currently built.

There is a direct relationship between unit size, cost per square metre, selling price per metre and affordability. The full impact of NDSS on viability including on build costs, selling prices, relevant price points and affordability should be assessed. Often the greatest impact is on smaller (2 bed / 4 person and 3 bed / 5 person) dwellings. In a Borough where the median house price to median earnings ratio has more than doubled increasing from 3.19 in 1997 to 7.23 in 2018, the Council cannot simply expect home buyers to absorb extra costs. An unintended consequence of adopting the NDSS may be to push additional families into affordable housing need because they can no longer afford to buy a NDSS compliant home.

There is also an impact of larger dwellings on land supply. The adoption of NDSS would reduce site yields so a greater amount of land would be needed to achieve the same number of units. The efficient use of land is less because development densities decrease. At the same time the cumulative impact on fewer units per site intensifies any viability challenges. The Council may simultaneously worsen affordability and undermine affordable housing delivery.

Finally, the Council should take into consideration any effects on delivery rates of sites included in the housing trajectory. The delivery rates on many sites will be predicated on market affordability at relevant price points and maximising absorption rates. An adverse impact on the affordability of first-time buyer and family sized products may translate into reduced or slower delivery rates. Consequentially, the Council should put forward proposals for transitional arrangements. Some sites should be allowed to move through the planning system before any proposed policy requirements are enforced. The NDSS should not be applied to any outline or detailed approval prior to the specified date and any reserved matters applications should not be subject to the NDSS.

Question 13.

Does our proposed policy provide sufficiently for the needs of people who wish to undertake self-build or custom housebuilding? If not, what other support would you suggest and why?

Draft Policy LP8 - Self-build and Custom Housebuilding seeks the provision of at least 5% of dwellings to be made available as serviced plots for self & custom build on housing allocations of 20 or more dwellings, where there is clear evidence of demand.

Under the Self Build & Custom Housebuilding Act 2015, the Council has a duty to keep a Register of people seeking to acquire self & custom build plots and to grant enough suitable development permissions to meet identified demand. The NPPG (ID: 57-025-201760728) sets out ways in which the Council should consider supporting self & custom build. These are :-

- developing policies in the Borough Plan for self & custom build ;
- using Council owned land if available and suitable for self & custom build and marketing such opportunities to entrants on the Register ;
- engaging with landowners who own housing sites and encouraging them to consider self & custom build and where the landowner is interested facilitating access to entrants on the Register ; and
- working with custom build developers to maximise opportunities for self & custom housebuilding.

The HBF is supportive of proposals to encourage self & custom build for its potential additional contribution to overall HLS. It is noted that under the first Bullet Point of Draft Policy LP8 the Council will support proposals for self & custom build in locations considered suitable for housing in accordance with Draft Policy LP1.

The HBF is not supportive of policy requirements for the inclusion of at least 5% serviced plots for self & custom build on allocated housing sites of 20 or more dwellings, which only changes housing delivery from one form of house building to another without any consequential additional contribution to boosting housing supply. The Council should not seek to place the burden for delivery of self & custom build plots onto other parties contrary to national guidance, which outlines that the Council should engage with landowners and encourage them to consider self & custom build. The Council's proposed policy approach should not move beyond encouragement by seeking provision of self & custom build plots as part of the housing mix on allocated housing sites of 20 or more dwellings.

All policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned. The Council's Self & Custom Build Register alone is not a sound basis for setting a specific policy requirement. As set out in the NPPG the Council should provide a robust assessment of demand including an assessment and review of data held on the Council's Register (ID 2a-017-20192020), which should be supported by additional data from secondary sources to understand and consider future need for this type of housing (ID 57-0011-20160401). The Council should also analyse the preferences of entries as often only individual plots in rural locations are sought as opposed to plots on housing sites. It is also possible for individuals and

organisations to register with more than one Council so there is a possibility of some double counting. The Register may indicate a level of expression of interest in self & custom build but it cannot be reliably translated into actual demand should such plots be made available. The Council has provided no evidence on the number of entries on its Register in order to gauge the level of likely demand. 52 out of 73 allocated sites in Draft Policy LP3 will be affected by this policy requirement resulting in a potential over-supply.

The Council's policy approach should be realistic to ensure that where self & custom build plots are provided they are delivered and do not remain unsold. It is unlikely that the provision of self & custom build plots on allocated housing developments can be co-ordinated with the development of the wider site. At any one time, there are often multiple contractors and large machinery operating on-site from both a practical and health & safety perspective it is difficult to envisage the development of single plots by individuals operating alongside this construction activity. Is it the Council's intention to take enforcement action against self & custom builders if dwellings are not completed within 3 years of commencement of development on a self & custom build plot as set out in this policy?

If demand for plots is not realised there is a risk of plots remaining permanently vacant effectively removing these undeveloped plots from the Council's HLS. As set out in Draft Policy LP8 where plots have been made available and marketed appropriately for at least 12 months and have not sold, the plot(s) may either remain on the open market as self & custom build or be offered to the Council or a Housing Association, before being made available for market housing. Is it the Council's intention to apply a non-implementation rate to its HLS for such occurrences?

Where plots are not sold it is important that the Council's policy is clear as to when these revert to the original developer. It is important that plots should not be left empty to the detriment of neighbouring properties or the whole development. The timescale for reversion of these plots to the original housebuilder should be as short as possible from the commencement of development. The consequential delay in developing those plots presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site. There are even greater logistical problems created if the original housebuilder has completed the development and is forced to return to site to build out plots which have not been sold to self & custom builders. The Council's proposed marketing period of at least 12 months is too long.

As well as on-site practicalities any adverse impacts on viability should be tested. It is the Council's responsibility to robustly viability test the Local Plan in order to set the cumulative impact of policy requirements so that most development is deliverable without further viability assessment negotiations and the deliverability of the Local Plan is not undermined.

Self & custom build dwellings are exemption from Community Infrastructure Levy (CIL) contributions and affordable home ownership provision as set out in national policy. Draft Policy LP8 may have a detrimental impact upon the level of affordable housing provision achieved on allocated housing developments. The Council may wish to adopt an aspirational approach in provision of plots to deliver self & custom build but this should not be pursued at the expense of delivering affordable housing.

Question 38.

Do you have any comments on Draft Policy LP33? If you don't agree with the proposed policy please set out why and what alternative approach would you suggest? Do you think we have missed something?

Draft Policy LP33 - Sustainable Transport requires new dwellings with a dedicated car parking space (excluding apartments and residential care homes with communal parking areas) to include an appropriate means to recharge electric vehicles.

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 a consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings was held by the Department for Transport (ended on 7th October 2019).

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 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 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. The requirement should be deleted from Policy LP33. If retained as a policy requirement, the Council should recognise the technical feasibility and viability impacts as identified by the Government. The Council's policy approach should allow exceptions if not technically feasible or viable.

Question 40.

Do you have any comments on Draft Policy LP35? If you don't agree with the proposed policy please set out why and what alternative approach would you suggest? Do you think we have missed something?

Draft Policy LP35 - Car Parking Standards proposes that provision of residential parking should reflect the guidance set out in the Leicestershire Highway Design Guide unless it is supported by robust evidence that illustrates that the development would not have a detrimental impact on highway safety, parking in neighbouring areas and local amenity.

The reference to the Leicestershire Highway Design Guide in Draft Policy LP35 should not be interpreted by the Council's Development Management Officers as conveying the weight of a Development Plan Document onto a Design Guide. This Design Guide has not been subject to examination and does not form part of the Local Plan. This reference should be removed from Draft Policy LP35. If it is inserted into supporting text, the Council should only be stating that development proposals should have regard to the Highway Authority's standards and guidance.

Conclusion

For the Charnwood Local Plan to be found sound under the four tests of soundness as defined by the 2019 NPPF (para 35), the Plan must be positively

prepared, justified, effective and compliant with national policy. It is hoped that these responses are helpful to the Council in preparing the next stages of the Charnwood Local Plan. As plan preparation progresses the HBF look forward to submitting further representations during later consultations, 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', written in a cursive style.

Susan E Green MRTPI
Planning Manager – Local Plans