

Sent by email to: [planningpolciy@oxford.gov.uk](mailto:planningpolciy@oxford.gov.uk)

27/03/2020

Dear Sir/ Madam

## **Response by the Home Builders Federation to the consultation on the Main Modifications to the Oxford City Local Plan**

Thank you for consulting the Home Builders Federation (HBF) on the main modifications to the Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year. Outlined below are our concerns.

### **MM15**

We continue to consider policy RE1 to be unsound with regard to the 40% improvement in carbon emissions than those achieved through the application of part L of the 2013 Building Regulations. This is inconsistent with national policy which in this instance continues to be set through the 2015 Written Ministerial Statement which allows for Councils to provide improvements in carbon emissions equivalent to level 4 of the Code for Sustainable Homes. The relevant passage states:

*“For the specific issue of energy performance, local planning authorities will continue to be able to set and apply policies in their Local Plans which require compliance with energy performance standards that exceed the energy requirements of Building Regulations until commencement of amendments to the Planning and Energy Act 2008 in the Deregulation Bill. This is expected to happen alongside the introduction of zero carbon homes policy in late 2016. The Government has stated that, from then, the energy performance requirements in Building Regulations will be set at a level equivalent to the (outgoing) Code for Sustainable Homes Level 4. Until the amendment is commenced, we would expect local planning authorities to take this statement of the Government’s intention into account in applying existing policies and not set conditions with requirements above a Code level 4 equivalent.”*

Code level 4 equivalency is roughly a 19% improvement over the 2013 building regulations. The Council’s position, as set out in paragraph 12.38 of their response to



initial question 12 states that the policy in RE1 represents a 20% additional requirement over and above what would be achieved through code level 4. This is clearly inconsistent with national policy and the policy should be modified accordingly. The Government are now moving forward with improvements in Building Regulations that will ensure consistency across all areas. We are concerned that policies such as these which go beyond the interim measures set out in the WMS will cause significant difficulties in the application of new national standards. Until these improvements have been finalised it is essential that Council's do not seek to require standards above what the Government have allowed through optional technical standards and the interim measures set out in the Written Ministerial Statement.

## **Conclusion**

We hope these representations are of assistance in taking the plan forward. Should you require any further clarification on the issues raised in this representation please contact me.

Yours faithfully



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Home Builders Federation

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