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OXFORD CITY COUNCIL

Oxford Local Plan 2045

Submission Draft COMMENT FORM

Part A

You only need to fill Part A in once

Your name: Mark Behrendt

Organisation (if applicable): Home Builders Foundation

Address: [redacted]

Email: [redacted]

Date: 13 March 2026

Data protection:

Please note that your response will be made available for inspection by the public in paper form at the Council's offices, or other locations as appropriate for the purpose of facilitating public access.

Your personal details will be properly safeguarded and processed in accordance with the requirements of the General Data Protection Regulation (GDPR) 2018. Your information will be used for The Oxford Local Plan 2045 Proposed Submission Consultation only, and we will only store your data until the Oxford Local Plan 2045 is accepted. Information you give in this form could be shared with the Independent Examiner at the examination stage of the Local Plan process.

We cannot accept anonymous comments.

☒ If you are happy for us to state your name and the first line of your address and postcode when publishing your response(s), please tick this box.

☐ If you would rather all personal details except your name and a non-specific address (e.g. Oxford) to be obscured, please tick this box.

	Yes	No
Do you wish to speak at the examination hearings? (Please note that the Inspector will decide who to invite to speak)	◉	○
Do you wish to be notified when:		
the Council submit the Oxford Local Plan 2045 to the Government?	◉	○
the Inspector's Report is published?	◉	○
the Oxford Local Plan 2045 is adopted by the Council?	◉	○

GENERAL ADVICE

For advice on making a comment, please see the accompanying notes page. It is also available at www.oxford.gov.uk/oxford-local-plan-2045

When completing the form,

- You only need to complete Part A once
- Use Part B to make your specific comments. You may complete Part B multiple times to comment on different parts of the Oxford Local Plan 2045.
- Cover concisely all the information and evidence you feel supports or justifies your view, as this will normally be your only opportunity to tell us about it.
- Be as precise as possible.

HOW TO SUBMIT YOUR COMMENTS

Please submit completed forms by email or post to:

planningpolicy@oxford.gov.uk

Planning Policy Team
Oxford City Council
Town Hall
St Aldate's
Oxford
OX1 1BX

If you have any questions please feel free to get in touch with the Planning Policy Team
T: 01865 252847
planningpolicy@oxford.gov.uk
www.oxford.gov.uk/localplan2040

Please ensure your comments reach us by **4.00pm on Friday 13th March 2026.**
Thank you for participating.

DETAILS OF YOUR COMMENT

Part B

Please use a new Part B for each point you are commenting on. Attach all completed forms to Part A.

Please read the accompanying notes before completing Part B. The notes explain what we mean by soundness and legal compliance. These are questions that we are expected to ask consultees.

Q1. Which part of the document do you wish to comment on? (please give the relevant paragraph or policy number)

Paragraph		Policies Map	
Policy Number	S3, S4, H1, H2, H3, C	Sustainability Appraisal	

Q2. Do you consider that the document:

(a) is legally compliant?	◉ Yes	☐ No
(b) is sound?	☐ Yes	◉ No
	○	○

Q3. Do you consider that the document is **unsound** because it is <u>not</u>: (tick as appropriate)

(a) positively prepared?	☑	(c) effective?	☑
(b) justified?	☑	(d) consistent with national policy?	☑

Q4. Please tell us below why you consider the document to be unsound or not legally compliant. If you do believe the document is sound or legally compliant, or complies you may use the box to explain why.

See attached representations.

Please use an extra sheet if completing a paper copy.

Q5. What change(s) do you consider necessary to make the document sound or legally compliant? Please explain why this change will achieve soundness or legal compliance. It would be helpful if you could suggest revised wording for the policy or text in question.

See attached representations

Please use an extra sheet if completing a paper copy.

This is the end of the comment form

planningpolicy@oxford.gov.uk

HBF Home Builders Federation

SENT BY EMAIL

[redacted]

13 March 2026

Dear Sir/ Madam

OXFORD CITY LOCAL PLAN 2045

1. Thank you for consulting with the Home Builders Federation (HBF) on the Oxford City Local Plan.

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 include 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.

Draft National Planning Policy Framework

3. HBF recognise the draft NPPF will have no weight until it is formally adopted. However, consideration will need to be given as to how the new NPPF, when it is published later this year, impacts on the soundness of policies in the local plan.

4. On the basis of paragraph 4 and 8 in Annex A of the draft NPPF this local plan, which the Council propose to submit under the current plan making process, will be examined under the NPPF24. However, it is also notable that in relation to decision making Annex A also states that from the date the new NPPF is published local plan policies that are *"…any way inconsistent with national decision making policies in this Framework should be given very limited weight, except where they have been examined and adopted against this Framework*". Therefore, should this new iteration of the NPPF be adopted unchanged the Council will need to have regard to national policies for decision making given that any inconsistency would effectively render many of the development management policies proposed in this consultation that are not consistent with the new Framework redundant as soon as the local plan is adopted.

5. It is clear from the draft NPPF, and the decision to establish national policies for decision making, that the Government are seeking to limit the number of development management policies in local plans that seek to gold plate policies and go beyond national standards which place significant burdens on applicants as well as their own officers. As such, when the final version of the NPPF is published it is HBF's contention that any policies which are inconsistent with the new framework should be deleted in order to avoid unnecessary and length discussions on an application by application basis as to the weight that should be attached to the policies in the adopted local plan.

Duty to Co-operate.

6. The publication of the Housing and Planning Minister's Written Ministerial Statement on Reforming Local Plan Making published on the 27th of November states that the Government have decided not to save the Duty to Co-operate. Therefore, once the relevant regulations have been enacted local planning authorities will no longer be under a legal duty to co-operate.

7. While the legal duty to co-operate will therefore not apply to this local plan this does not remove the requirement in the NPPF that in order to be considered sound a local plan must be "*based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground*". The only difference arising from the removal of the duty is that a failure to co-operate effectively is a soundness matter. With regard to unmet housing needs the Council have published a Joint Statement of Common Ground with the other Oxfordshire Local Planning Authorities. This provides evidence as to approach to co-operation and the agreements that have been reached with South Oxfordshire, Vale of White Horse and Cherwell who will each deliver additional homes to meet the needs of Oxford. No agreement has been reached with West Oxfordshire as to their ability to meet some of Oxford's unmet needs.

Policy S3: Infrastructure Delivery in New Development

<u>This policy is unsound as is not effective or consistent with national policy.</u>

8. Planning for infrastructure is integral part of local plan preparation and, as set out in paragraph 35 of the NPPF any contributions required by development to ensure development is acceptable should be set out in the local plan. HBF would therefore suggest that greater clarity is needed in the opening sentence of the second paragraph of Policy S3. The sentence requires developers to engage with the council and infrastructure service provides to discuss their requirements. However, HBF does not consider this to accurately reflect what is required by the NPPF. While it is accepted that early engagement is required this should be with regard to the infrastructure specifically identified within the local plan to make the development acceptable. This avoids additional requirements being added to development proposals that have not actually been identified through plan making. HBF would recommend that the first sentence is amended to read:

> *"Developers will be expected to engage early with the Council and infrastructure service providers to discuss <u>the infrastructure identified in this local plan that is necessary to make development acceptable</u>. ~~their requirements.~~*

S4: Plan Viability.

<u>This policy is unsound as it is not effective.</u>

9. House builders are facing increasingly challenging market conditions with the costs of materials and labour increasingly rapidly, the Building Safety Levy, Biodiversity Net Gains and Land Fill Tax increasing the regulatory burden and higher standard required by building regulations all adding to the burden even before local plan

policies are taken into account. As such HBF welcomes the inclusion of policies in local plans that provide decision makers with the flexibility to consider the viability of development. However, if, as is stated in the opening paragraph of S4, it is to be assumed that development that complies with the policies in this local plan are viable then the full costs of the national and local policies within the local plan must be accurate.

10. HBF are concerned that not all the costs facing house builders have either been included or accurately assessed in the Council's Viability Assessment. Firstly, no allowance appears to have been made for the Building Safety Levy. For Oxford this will place an additional £23.62 per sqm on Previously Development land (PDL) and £47.24 per sqm on non-PDL[1] which will need to be included in the VA.

11. Secondly the cost relating to BNG are based on the DEFRA Impact Assessment from 2019. The 0.7 % cost increase used is based on the Central Estimate where 25% is delivered offsite at a cost of £11,000 per biodiversity unit. This is considerably lower than the costs being experienced by the development industry. The latest pricing report by Biodiversity UK from February 2026[2] indicates costs range from £25,000 to £30,000 per unit for the medium distinctiveness habitats with higher distinctiveness habits costs in excess of £50,000. Therefore, where there is a need to deliver more BNG offsite the cost assumed in the VA will be significantly lower than would be experienced by a developer. It must also be remembered that the cost of BNG will vary significantly from site to site and without an understanding the biodiversity on a site it is impossible to know what that cost will be. For example, an urban site may be defined as open mosaic habitat that is difficult to recreate on site and could require 100% offsite delivery at over £50,000 per biodiversity unit. Therefore, it is essential that there is significant headroom in all development to ensure that BNG requirements will not be a barrier to development in future. Iti also noted that BNG and Urban Greening Factor have been costed together. The Council will need to provide justification for this approach.

12. HBF also consider the costs relating to policies R1 and R2 to have been under estimated. HBF do not consider the uplift including the VA to be representative of the cost of meeting net zero homes. The uplift, included the VA is 5%, as set out in paragraph 4.20. The cost of achieving net zero is likely to be higher. Work undertaken by the Future Homes Hub and published in '*Ready for Zero*'[3] indicates in Figure 7 of that report that the costs of achieving space heating standards being proposed by the Council are likely to be 15% to 19% above those of current building regulations. These costs are based on detailed assessment made by house builders as to what it will cost and as such should be given significant weight when compared to the broad assumptions used in the Council's evidence. An additional uplift of has then been given for achieving net zero embodied carbon meaning the cost included is 15% for both R1 and R2. However, based on evidence from the Future Homes Hub this is likely to only address R1 at best and an additional uplift will be required to address costs relating to policy R2.

13. To conclude, HBF are concerned that the policy is not effective as the viability evidence supporting the local plan does not reflect the cost of developing new homes in Oxford. Given that the VS is integral to decision

[11] https://www.gov.uk/guidance/building-safety-levy-guidance/section-2-levy-rates-and-calculations
[2] https://www.biodiversityunits.com/news-insights/bng-pricing-report-february-2026-two-years-on
[3] https://www.futurehomes.org.uk/library

making and the assumption in the opening sentence, which reflects paragraph 59 of the NPPF, HBF does not consider this policy at present to be effective. In order to be effective, the VS must be amended to reflect the higher costs facing development compared to the assumptions made in the VS.

H1: Housing Requirements

The policy is unsound as it is not effective.

14. The housing requirement in H1 of 9,267 at 463 dwelling per annum (dpa) is a constrained requirement which leaves 12,480 homes to be delivered elsewhere in order for Oxford's housing needs to be met. At present scale of the unmet housing needs is not stated in the local plan nor is it stated where these unmet needs will be met. This will need to be addressed in order to provide clarity as to what is needed and how this is being addressed. As set out earlier, the Council has not published any evidence to show how the Council have co-operated with their neighbours in preparing this local plan and this will need to be rectified. While HBF recognise that the Government are proposing not to save duty to co-operate as part of their planning reforms both for all plans being both prepared and examined it does not remove the requirements in paragraph 24 to 28 in NPPF to maintain effective co-operation.

15. On the basis of the plans being examined and prepared in neighbouring areas the unmet needs of Oxford will be met by Cherwell (4,400 homes), South Oxfordshire (4,950 homes) and the Vale of White Horse (1,830 homes). This leaves a shortfall of 1,300 homes over the plan period. Therefore, the Council will need to show where the additional needs are being met, either in the one of the above authorities or in West Oxfordshire.

16. If the co-operation on unmet needs is to be considered effective the Council will need to be able to show that those Councils that have agreed to meet some of Oxford's needs will do so regardless of changing circumstances. As the Council will be aware hosing needs in Vale of White Horse, South Oxfordshire and Cherwell are over 1,400 home more each year than the plans currently being examined. The Council will therefore need to seek clear policy commitments in the relevant plans so that any additional supply identified to meet Oxford's needs will not be used to meet their own needs as part of the earlier reviews of their local plans that are to be legislated for in the Government's planning reforms[4].

17. HBF also remains concerned that the plan fails to acknowledge the interaction between housing and economic growth and that housing needs in Oxford may be higher than that established by the standard method. Oxford is a key part of the British economy. The Council's own Background Paper 001 on 'Housing Need, Requirement and Mix' acknowledges this outlining that "Oxford has acute housing pressures that need to be addressed" and

[4] "… local planning authorities who submitted a plan for examination on or before 12 March 2025 with an emerging housing requirement that was meeting less than 80% of local housing need will be required by regulations to publish their Notice to Commence Plan-Making by 30 June 2026 and their Gateway 1 self-assessment by 31 October 2026." https://www.gov.uk/government/publications/plan-making-regulations-explainer/plan-making-regulations-explainer

that the city is an "… important part of the knowledge economy, with a world- renowned university and hospitals". This is also reflected in paragraph 1.3 of the Employment Land Needs Assessment which states:

> *"The importance of Oxford in driving forward economic growth and the national economy is recognised by the Government, and set out in the Industrial Strategy, published in June 2025. With support for major infrastructure improvements associated with the Oxford-Cambridge Growth Corridor identified to support growth. Oxford is identified as one of a small number of locations the Government seeks to support clusters of Advanced Manufacturing, Digital and Technology and Life Sciences. The role of Oxford is clearly global in its economic outreach and future potential.*

18. A key barrier to this growth is housing supply that has been repeatedly recognised as a barrier to future growth in Oxford and Oxfordshire. These concerns continue to be raised in Oxfordshire with the latest report from the Oxford Growth Commission[5] which suggests that local plans must adopt the standard method with a further allowance to support the scale of economic growth across the County. The ELNA also notes in paragraph 5.6 that recent Government strategies on raise the issue of the cost of housing in Oxford and how alongside infrastructure provision is a barrier to growth in of the land and R&D market.

19. The conclusion of the ELNA in paragraph 6.74 with regard to jobs growth is that an uplift to hosing needs over and above the standard method is not currently justified. However, it does note that should labour supply be lower than expected then an uplift in the housing requirement may be necessary. The standard method is the minimum required and close attention will need to be given to labour supply and whether this suggests a higher level of housing need is required to ensure housing does not continue to be a barrier to investment. However, what is patently clear from the ELNA is that in order to ensure the expected levels of economic growth in Oxford are deliverable, as a minimum, the standard method for the city must be met. As this cannot be achieved in Oxford itself it places great importance on these needs being met in full elsewhere in Oxfordshire.

20. HBF therefore does not consider this policy to be sound for a number of reason. Firstly, unmet needs have not been fully addressed, which raises questions as to the effectiveness of the co-operation undertaken as part of plan preparation. Secondly, the assessment of needs on which it is based, and consequently the unmet needs that must be addressed, does not take sufficient account of economic growth factors. Finally, HBF also considers the policy to be unsound as it does not set out in full the number of homes required to address unmet housing needs and who is meeting this needs should also be set out in the local plan. In addition, if there remains a shortfall in committed delivery elsewhere in Oxfordshire to meet the housing needs of Oxford this will need to be clearly articulated in the local plan in order for it to be taken into account by decision makers in neighbouring areas.

H2: Delivering Affordable Homes

<u>This policy is unsound as it is not justified.</u>

[5] https://www.gov.uk/government/publications/oxford-growth-commission-interim-report

21. This policy requires a 40% affordable housing requirement on all self-contained residential development of 10 or more units, aside from Green Belt sites where this should be a minimum of 50%. For non-Green Belt sites this is a reduction from the current local plan which requires all development to provide 50% this is welcomed and reflects the higher costs of delivering development the industry is experiencing. However, as set out earlier in our representation HBF are concerned that the viability assessment underestimates the costs associated with some of the policies in the local plan and this will need to be addressed prior to submission.

22. As to whether all residential development should be required to deliver 40% affordable housing HBF note that there are a number of typologies that cannot meet this figure. As such the statement in opening sentence of S4 is untrue. Decision makers cannot assume development that meet the policies in this local plan are viable. The approach being taken by the Council is that some development is viable, but where it is not viable the Council will seek a negotiated position. This should be reflected in the policy through the following amendment "*where viable a minimum of 40% of units …*". This change would ensure that the Council's approach is consistent with the evidence.

H3: Affordable housing contributions from other types of development.

<u>The policy is unsound as it is unjustified.</u>

23. HBF disagrees with the requirement for older people's housing to provide a contribution towards affordable housing given that the evidence indicates that such development is, by and large, made unviable by the policies in this local plan. The Council have tested older people's accommodation in appendix 9 and this indicates that 40% is not achievable and that only in the highest value areas would any affordable housing contribution be achievable. As such HBF would suggest that specialist forms of accommodation such as older people's housing are removed from the requirement to provide affordable housing on site.

G4: Deliver mandatory net gain in biodiversity.

<u>This policy is unsound as it is not consistent with national policy.</u>

24. The opening paragraph to policy G4 should be amended or deleted as delivering 10% biodiversity net gains is a statutory requirement that is applied post permission and as such is required to deliver 10%. HBF recognises that this does not mean it should not be considered as part of the planning application but this, as set out in paragraph 74-002 will be in relation to whether the relevant condition can be successfully discharged.

25. The policy sets out in the fourth paragraph of G4 a hierarchy of preference as to where offsite net gains should be delivered. This is not consistent with the hierarchy in PPG which sets out in paragraph 74-008 that in the first instance the loss of habitats should be avoid before being compensated for by the enhancement of existing on site habitat, the creation of new one site habitats, the allocation of registered offsite habitats and finally the purchase of biodiversity credits. However, there is no indication in PPG that Councils can specify where offsite gains should be delivered. As the the metric already includes a spatial risk multiplier which increases the number

of units required to deliver net gains the further it is delivered from the site there is in fact no need for the Council to specify where it should be provided. The main focus for the Council should be identifying locations where units can be purchased within or close to Oxford. As such this paragraph should be deleted.

G5: Delivering onsite ecological enhancements

The policy is unsound as it unjustified.

26. HBF does not consider this policy to be sound. Improvements in biodiversity are delivered though statutory Biodiversity Net Gains and as such it is unjustified to require additional ecological enhancements to buildings. HBF recommend that the first send and third paragraphs of G5 are deleted.

R1: Net Zero Buildings in Operation

The policy is unsound as it is not consistent with national policy and is unjustified.

27. HBF do not consider this policy to be consistent with national policy, and it should be deleted. As set earlier HBF recognises that at this stage very little weight can be attached to the draft NPPF. However, careful attention will need to be given to the outcomes of the consultation and the final document that is adopted. With regard to standards related to carbon emission and energy efficiency standards consideration will need to be given to PM13 which states that other than standards for accessibility, water efficiency and nationally described space standards local plans should not cover matters already addressed in building regulations. In addition, it is also notable that the latest consultation on the NPPF proposes to amend the Planning and Energy Act 2008 in relation to the setting of local energy efficiency standards that go beyond building regulations to make clear that local plans should not set higher energy efficiency standards for residential development. Once adopted the NPPF would also replace the 2023 Written Ministerial Statement (WMS) 'Planning – Local Energy Efficiency Standards Update'. As such If PM13 remains this policy would be inconsistent with national policy from the point at which the new NPPF is adopted with limited weight being given to these policies with decision making. In such a situation HBF would suggest that these policies are deleted.

28. However, at present the Planning and Energy Act 2008 and the WMS allow local planning authorities to set standards that are higher than building regulations, with the WMS noting that "*Compared to varied local standards nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes*" and that local standards can "*add further costs to building new homes by adding complexity and undermining economies of scale*". After setting out these concerns, the 2023 WMS does go on to state that any standard that goes beyond building regulations should be rejected at examination unless the LPA does not have a well-reasoned and robustly costed rationale that ensures:

    - That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.

- The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).

29. HBF does not consider the approach set out in R1 to be consistent with the WMS nor that the implications of such a policy have been properly assessed in the supporting evidence base. Our detailed points are set out below.

30. The approach proposed by the Councils based on energy use is inconsistent with the approach set out in the WMS and as such is unsound. The intention of the WMS and the Planning and Energy Act was to enable local authorities to go beyond building regulations but not to set wholly new standards. This was noted in by Justice Lieven's decision which referred to statement by the Minister at the time where the minister confirmed that councils "can go further and faster than building regulations, but within the national framework" and that the intention was for "… local authorities, in setting energy efficiency standards, to choose only those standards that have been set out or referred to in regulations made by the Secretary of State, or which are set out or endorsed in national policies or guidance issued by the Secretary of State. That approach was taken with a view to avoiding the fragmentation of building standards, which could lead to different standards applying in different areas of the country …".

31. It should also be noted that the Government have considered as part of consultation on the Future Homes Standard whether it was appropriate to use a delivered energy metric such as the one being proposed in the policy position paper and have concluded that these do not offer any additional benefits to those being taken forward by Government. Therefore, if the Council are to require standards above those set out in building regulations they must be expressed as a percentage of the target emission rate and not as an energy use target in order to avoid fragmentation of the standards with different requirements being set in different areas which it must be recognised was not only an expectation of the WMS but also of the legislation that permits council to adopt higher standards in local plan in the first place. HBF are aware that planning inspectors examining other local plans have considered it to be justified to depart from the national policy, but we do not consider there to be a justification for departing from either the WMS or the Planning and Energy Act (2008) in setting a wholly different standard to that required by Building Regulations which places an unreasonable burden on developers to assess performance against a wholly different performance standard.

32. With regard to viability of achieving this policy are set out in the WPVA as being 5% above current building regulations. HBF consider these to be too low. The expected cost of meeting this policy can be seen in the Future Homes Hub (FHH) report 'Ready for Zero' which is based on the actual costs experienced by house builders in delivering homes to higher energy standards rather than theoretical costing exercises. The various specifications and costs considered are summarised in Figure 8 of this report and indicates that in order to deliver standards above the FHS on a three bedroomed end of terrace house (specifications CS3, CS4 and CS5 in the FHH report) would be around 15-19% higher than the 2021 Building Regs, around £17,000 to £22,000 more per unit, and significantly higher than the Council's evidence suggests would be the cost of achieving this policy. Given that there is still significant uncertainty as to the cost of delivering the standards being proposed the Council will need ensure that the costs relating to the policy are increased.

33. However, in addition to considering viability the Council will also need to provide evidence as to the potential impact on the affordability of new homes and the ability of the development industry to meet these standard when the plan is adopted. To start, HBF would not disagree that the proposed standards are technically feasible. However, HBF are concerned as to the impact these requirements will have on the rates at which sites can deliver new homes on all types of sites. Given that the standards proposed are higher than those proposed by Government in the Future Homes Standard and will require higher levels of fabric efficiency, which in turn will require new skills and materials that may not be readily available, HBF are concerned this could slow delivery in the short to medium term as supply chains are developed. When considering the ability of the industry to meet the proposed standard and its potential impact on delivery in the short term, the commitment to delivering 1.5 million new homes by 2030 must be given significant weight.

34. It has been recognised by the FHH that to deliver higher standards will require phased transitional arrangements to enable a steady build-up of skills and ensure quality. The FHH also notes in 'Ready for Zero' that even if a short transition period between current standards and those similar to the Councils are proposing that this would "… create a high risk of quality problems, inflated costs and, potentially, stalled build programmes." However, HBF can find no evidence that the Council has considered whether its proposed standard will impact on the rate at which new homes can be built. The Council will need to speak directly to a range of housebuilders operating in Reading to understand the impact of its policy on the rate at which homes will be delivered on its allocated sites. Without any consideration of delivery then the Council's decision to go beyond what is required by building regulations is clearly unjustified

35. While HBF understands the desire for LPAs to go further it must be recognised that current policy outlines that even where development can viably implement higher standards this must be within a consistent technical framework and approach to assessing building performance against those technical standards. Indeed, this has long been the case in planning policy with paragraph 159b of the NPPF stating that "*Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards*".

36. If the Council has the evidence to show that the policy is deliverable, they will need to ensure that all other policies in the local plan are consistent with delivering the levels of embodied carbon being proposed. The most energy efficient design will inevitably lead to less variety in the built form in order to reduce the surface area of the building. This will need to be reflected in design policies and any design codes that are produced to ensure that development is not refused for seeking to meet energy efficiency standards but, for example, not being designed in the character of the local area.

R2: Embodied carbon in construction.

<u>This policy is unsound as it is not justified or effective.</u>

37. This policy expects all development to demonstrate consideration of embodied carbon over the life time of the development and take actions to limit these as much as possible. In addition, the policy expects development of 100 or more dwellings to include a measurement of embodied carbon using a recognised methodology. HBF

recognises the importance of reducing embodied carbon in developments, however it must be noted that there is nothing in NPPF to support policies that require developers to undertake whole life carbon assessments. These are onerous assessments and at present there can be significant inconsistencies in the outcome of any assessment due to the fact that not all products will have Environmental Product Declaration (EPD). This makes it difficult for consistent assessments to be undertaken across the developments which could in turn lead to inconsistent decision making. To avoid decision makers seeking to compare outcomes between developments as to reducing levels of embodied carbon, HBF would suggest that the requirement for a whole life carbon assessment as set out in the second paragraph of this policy is deleted.

Conclusion

38. At present we do not consider the plan to be sound, as measured against the tests of soundness set out in the NPPF. I can therefore confirm that the HBF would like to participate in any hearing sessions held at the examination in public on the matters raised in our representations and that we would like to be kept informed of the submission and examination of the local plan.

Yours sincerely,



Mark Behrendt

Regional Planning Manager – SE and E

Email: [redacted]

Phone: [redacted]