

Dear Sir/ Madam

GREATER CAMBRIDGE LOCAL PLAN

1. Thank you for consulting with the Home Builders Federation (HBF) on the Greater Cambridge 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.

NPPF consultation

3. In December 2025 the Government published a consultation on the new NPPF. HBF recognise this will have no weight until it is formally adopted but once adopted the Council will need to give weight to this iteration of the local plan. On the basis of paragraph 4 and 8 in Annex A of the draft NPPF being consulted on, 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 policies in the local plan that are not consistent with the new Framework redundant as soon as the local plan is adopted.
4. It is clear from the draft NPPF and the decision to establish national decision making policies that the Government are seeking to limit the number of development management policies in local plans that look to gold plate policies and go beyond national standards which place significant burdens on applicants as well as their own officers. As such, where policies are inconsistent with the new framework HBF would recommend that these are deleted in order to avoid unnecessary and length discussions on an application by application basis as to the weight that should be attached to these.

Policy S/JH: New jobs and homes

5. This policy establishes that the housing requirement for the Greater Cambridge area as 48,195 over the plan period 2024 to 2045 – a total of 2,295 dpa – which is consistent with the outputs of the Standard Method. As the

Council will be aware this is the minimum number of homes needed and there may be circumstances where it is necessary to plan for a level of housing needs above that required by the NPPF. The first of these, referenced in paragraph 62 of the NPPF, is where there are unmet needs in neighbouring areas. The second consideration is set out in paragraph 88 of the NPPF which outlines that planning policies seek to address potential barriers to investment such as inadequate infrastructure, services and housing.

6. With regard to unmet needs the Duty to Co-operate compliance statement provides no detail as to whether neighbouring areas will be able to meet their needs in full. The Council state in the local plan that they have not been asked to address the needs of another area. However, the focus of the correspondence with neighbouring areas appears to be solely in relation to the whether there was capacity elsewhere to meet some of Greater Cambridge's housing needs rather than whether those areas are able to meet their own needs. HBF recognises that following the publication of the Housing and Planning Minister Written Ministerial Statement on the 27th of November the Government have decided not to save the Duty to Co-operate. Therefore, once the relevant regulations have been enacted Greater Cambridge will no longer be under a duty to co-operate with its neighbours. However, this does not remove the policy requirement in the NPPF to maintain effective co-operation nor the need to consider, in addition to their own housing needs, "*... any needs that cannot be met within neighbouring areas ...*" as set out in paragraph 62 of the NPPF. The only difference arising from the removal of the duty is that a failure to co-operate effectively is a soundness matter that can be rectified through main modifications. Therefore, it will be necessary, as the plan progresses, to establish and set out within statements of common ground how many homes will be built in neighbouring areas and the likelihood of unmet needs arising over the plan period.
7. With regard to paragraph 88 of the NPPF the Council has undertaken an assessment as to the number of homes that are required to meet the jobs growth expectations over the plan period. The outcome of this assessment in the Employment and Housing Needs Update is that the preferred employment scenario which would see the delivery of 73,248 jobs over the plan period is closely matched by the level of jobs growth supported by the standard method of 73,632. The conclusion of the EHN is based on the central growth assumptions which is considered to be the most likely scenario with the higher growth scenario being dismissed. However, it is noted in paragraph 3.62 of the EHN that the high scenario could be achieved with step change in investment.
8. Given that the Government have recently announced a £400 million investment in Cambridge to overcome the barriers to growth, such as housing supply and affordability, there is clearly an ambition to sustain the economic growth in the long term there would appear to be some justification for adopting a higher growth scenario and ensuring that housing needs are not a barrier to future investment. HBF would suggest that with the proposed investment the higher growth figures that see a balanced return to the 20 year trend growth ambitions that see a continuation of the 10 year trend compared to the central assessment are adopted.
9. HBF also note that the previous assessment of need required 2,463 dpa to deliver employment growth over 21 years of 66,000 jobs, compared to 2,292 dpa to deliver 73,200 jobs over the number of years. The reason given for this is the fact that average house hold sizes are now larger, an increase in people of working age and more

in-commuting which reduces the number of local people required to fill the jobs created. It is accepted that changing demographics such as increased working age population will impact on the number of homes needed however we are concerned that a reliance on larger household size and increased commuting are not sustainable approaches to ensuring the balance between economic needs and housing growth. Increasing household size can be a result of poor affordability with younger people unable to move out of the family home due to housing costs – an issue that should be addressed through the plan not embedded by it. With regard to commuting patterns the evidence would appear to indicate that the plan is promoting less sustainable patterns of travel rather than, as is required by paragraph 111 of NPPF using planning policies to minimise the length and journeys needed for employment.

10. In conclusion HBF would suggest the evidence on economic growth and housing needs suggest more homes are required in order to support the growth of the Greater Cambridge area. We would recommend that the higher growth scenario is used to inform housing needs in the next iteration of the local plan.

Housing supply

11. In order to meet the minimum number of homes required by the standard method the Council state that once existing allocations, sites with permission and those with a resolution to grant permission land for a further 10,330 homes will need to be allocated. Table 4 of the local plan indicates that the Council have identified sites to deliver a further 13,463 homes. This results in a total land supply over the plan period to deliver 51,328 homes. This increases to 55,278 if supply from North East Cambridge (NEC) is included. This means that without NEC there is a contingency of 6.5% and with NEC 14.7%. HBF recommends a contingency of between 10% and 20% depending on the sites that form part of the supply. Where there are a significant number of larger sites delivering home at the end of the plan period HBF would consider it necessary for the contingency to be closer to 20% to ensure that any delay in the delivery of such sites does not require intervention over the life time of this plan. On the basis that 94% of the homes expected to be delivered on the latest allocation are over 1,000 homes, with four of these allocations delivering well beyond the plan period, HBF considers it necessary for the contingency in this local plan to be closer to 20%.
12. HBF also note that the housing land supply across the plan period does not exceed 5.5 years, with land supply on adoption in 2027/28 estimated to be 5.15 years. As such the land supply is relatively fragile and that any delay to the delivery of the newly allocated sites could mean the Council falling below the required 5 years. Additional small and medium sized sites coming forward the first five years post adoption would provide the necessary contingency to ensure the five-year supply is maintained and the plan remain up to date.

10% small sites

13. In paragraph 2.43 the Council notes the requirement in paragraph 73 of NPPF that at least 10% of the homes delivered over the plan period should be on sites no larger than one hectare. The Council outline that in order to meet this requirement they will have to identify sufficient land to accommodate over 4,820 homes on such sites. The Council consider that they can meet this through identified sites and windfall on small sites which are

anticipated to deliver 6,976 homes over the plan period. However, it is noted that only 1,694 of these homes are on identified sites. In meeting the requirement of paragraph 73 the NPPF is clear that these homes must be on identified sites – either as an allocation in the local plan or as a site in the Council’s Brownfield Register. Windfall development is defined in the NPPF Glossary as “*Sites not specifically identified in the development plan*”. As such the Council cannot rely on assumed levels of windfall delivery on small sites to meet this requirement. In order to ensure the plan meets this requirement the Council must identify, either an allocation in the local plan or as a sites on the brownfield register, small sites that have the potential to deliver a further 3,126 homes.

14. The Council state this is an appropriate response as to allocate these sites would require the delivery of a large number homes in less sustainable locations where levels of car use would be higher. The Council also site that it may require the release of land from the Green Belt to achieve this objective. However, it is not a forgone conclusion that small sites will be in less sustainable locations, this is simply an assumption that has been made by the Councils. There must be a proactive effort to identify small sites with a view to allocating these in the local plan and not simply dismiss further allocations as being unsustainable.
15. As part of this HBF urges the Council to give careful consideration when updating its Green Belt Study as to whether there are any small sites in locations that are defined as grey belt that could be allocated in order to increase the supply of homes on identified sites of no more than one hectare. HBF recognise that green belt boundaries can only be altered in exceptional circumstances. NPPF notes that one such circumstances is where the Council cannot meet its needs in full but recognises that the inability to meet development needs is not the only circumstance. HBF would suggest the significant shortfall in identified small sites in the local plan and the over reliance on strategic sites to meet needs is justification for allocating small sites in locations that are identified as grey belt.
16. The Council state that the windfall allowance supports the overall aim of this policy. HBF disagrees. It is important to recognise that the allocation of small sites is a priority and stems from the need to support small house builders by ensuring that they benefit from having their sites identified for development either through the local plan or brownfield register. The effect of an allocation is to take some of the risk out of that development and provide greater certainty that those sites come forward. This in turn will allow the SME sector to grow, deliver homes that will increase the diversity of the new homes that are available as well as bring those homes forward earlier in the plan period. Requiring small developers to rely solely on windfall means that they receive none of the benefits of allocation which remain almost solely the preserve of larger developers in Greater Cambridge.
17. The Council should also recognise that allocating small sites and supporting SME house builders not only ensures a stronger supply in the short term but also improves the diversity of choice within local housing markets, support local and regional supply chains and are often pivotal in bring forward innovation and supporting jobs growth locally, with 1 in 5 of the SME work force comprising of apprentices. A failure to allocate small sites will contribute to the continued decline in small and medium sized house builders. Recent research by the HBF has found that there are 85% fewer small house builders today than there were 20 years ago and that of a survey of SME house builders 93% said that planning was a major barrier to SME growth. Whilst this decline is due to

a range of factors, more allocations of small sites would ease the burden on many SME developers and provide more certainty that their scheme will be permitted, allowing them to secure the necessary finance that is often unavailable to SMEs until permission is granted.

CC/NZ: Net Zero Carbon in New Buildings

18. As set out above while very little weight can be attached to the current consultation on the NPPF 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 both NZ2 and NZ3 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.
19. 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).
20. HBF does not consider the approach set out in CC/NZ 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.
21. 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 ...*”.

22. 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 continue there to be no 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.
23. With regard to viability HBF the Council costs are set out in the Up[date to Net Zero Cost Analysis with Table 3.1 setting out the cost of meeting the net zero policies to be between 5% and 7% depending on the type of property. The costs for similar standards to those being proposed can be found in the Future Homes Hub report ‘Ready for Zero’. This study tests a number of archetypes against a range of specifications from the current standards set out in the 2021 Building Regulations through to standards that will achieve similar standards to those proposed by the Council.
24. The various specifications and costs considered are summarised in Figure 8 of Ready for Zero 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 further sensitivity testing is undertaken in the viability study.
25. 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.

26. 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 could 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
27. 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*".
28. If the Councils have 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.
29. With regard to embodied carbon the policy requires an assessment be undertaken as to the total embodied carbon emitted as part of the A1 to A5 stages set out in the RICS assessment methodology and for the developer to demonstrate what actions will be undertaken to reduce these. Firstly, it must be noted that there is nothing in NPF to support policies that require developers to undertake whole life carbon assessments. These are onerous assessments and there can be significant inconsistencies in the outcome of any assessment depending on the materials used. While the RICS methodology is probably the most appropriate for assessing carbon inputs it must be remembered that not all products will have Environmental Product Declaration (EPD) making it difficult for consistent assessments to be undertaken across the developments. 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 be deleted.

CC/WE – Water efficiency in new developments

30. HBF's position is that it is the legal responsibility of water companies to ensure a supply of water for new development and that it should not be for house builders and other developers to address the failings of water

companies to upgrade infrastructure to increase supply and prevent the huge loss of water from leaks. It is therefore not sound for the council to ask developers to show that there is capacity. HBF does not consider this to be necessary as the capacity of the water supply infrastructure to be a land use planning matter for consideration on an application-by-application basis as Water companies are subject to statutory duties under S37 and 94 of the Water Industry Act 1991 (WIA 1991). Section 37 of the Act, set out below, imposes a statutory duty on all water companies to provide and maintain adequate infrastructure and potable water supplies.

“S37 General duty to maintain water supply system etc. (1) It shall be the duty of every water undertaker to develop and maintain an efficient and economical system of water supply within its area and to ensure that all such arrangements have been made— (a) for providing supplies of water to premises in that area and for making such supplies available to persons who demand them; and (b) for maintaining, improving, and extending the water undertaker’s water mains and other pipes, as are necessary for securing that the undertaker is and continues to be able to meet its obligations under this Part. (2) The duty of a water undertaker under this section shall be enforceable under section 18 above— (a) by the Secretary of State; or (b) with the consent of or in accordance with a general authorisation given by the Secretary of State, by the Director.”

31. Consequently, it is inappropriate to include a policy in the local plan requiring a housebuilder, or other applicants for development, to assess the capacity or otherwise of the water company to provide water supply connections as they are an attempt to get applicants to do things for which they are not legally responsible. Rather it is the responsibility of water companies, working with local authorities and the Environment Agency, to plan for the future demand for water services relating to the development requirements proposed in local plans, not applicants. If the Council cannot show that there is sufficient water supply to meet the level of development set out in the local plan, then it cannot be considered to be deliverable. HBF therefore consider it necessary for paragraph 1 to be deleted.
32. However, it is recognised that in where there are exceptional pressures on water supply are inhibiting the delivery of new development in an area, the Government is supportive of introducing standards lower than those set out in Building Regulations. This was specifically noted in the Joint Statement on addressing water scarcity in Greater Cambridge with the draft NPPF also noting that there may be exceptional circumstances for introducing more stringent standards than those set out in building regulations. The standard being proposed in “*Shared Standards in Water Efficiency for Local Plans*” was for 85 litres per person per day (lppd) which would be achieved through a fittings based approach. With regard to the 85 lppd requirement HBF remain concerned that the customer experience will be impacted by homes built to the standards. Many households will want a bath, higher capacity washing machine and more powerful shower. This policy will prevent house builders from offering such products, reducing customer satisfaction and potentially leading to these fixtures being replaced as it is unclear as to how the policy will prevent the owners of new homes from installing baths or different less water efficient appliances once they are in occupation. This is noted by the Future Homes Hub in the ‘Water

Ready' Report¹ which highlighted the perverse outcome of those moving into new homes scrapping perfectly serviceable washing machines.

33. However, the Council are proposing that development of over 100 dwellings will be required to meet a standard of 80 lppd. This lower standard would require development to introduce water recycling or water reuse. As the Council's evidence base notes there are still some concerns as to the legal implications of using reclaimed water for domestic purposes and this is the reason why a standard for of below 85 lppd that can be achieved through a fixtures led approach is being recommended in the shared standards report. These concerns are reflected in the 'Water Ready' report which notes in relation to water reuse systems that:

“... if they are not well designed and identified, they do increase the risk of cross contamination. There is therefore a need for a clearly defined standard approach to cover items such as layout options, differing pipework sizes or other mechanisms to readily identify these and prevent cross connections and materials; before any such systems can be mandated.”

34. While the policy states that the use of water reuse/ recycling is subject to amendments in relevant legislation, HBF suggests that until there is clarity as to the legal position on such matters and that there are clear national standards and guidance for installation on going stewardship/ maintenance the Council should not be seeking to require water reuse systems in order to achieve 80 lppd.
35. Finally, while we are not supportive of the lower standard in order to allow some homes to meet different demands HBF would suggest that the standard is an average across the site to allow homes that are able to go below this standard to offset a higher water usage in other units.

CC/CE: Supporting a circular economy and sustainable resource use

36. It is not clear why part 1 of this policy is necessary given that this issue is already addressed in part 8 of CC/NZ.
37. With regard to part 2 there is nothing in NPPF to support the presumption in favour of repairing, reusing or refurbishing an existing building over its demolition. While paragraph 161 of the NPPF sets out that the planning system on the whole should encourage the reuse of existing resources and the conversion of existing buildings a presumption against demolition overly onerous and will deter developers from seeking to deliver development on previously developed land where there are buildings on site due to the risk that demolition will not be supported. The outcome of this policy will therefore be less windfall development in the urban area and fewer opportunities to increase densities where possible. Such an outcome is clearly in stark contrast to the NPPF which seeks to increase the delivery of development on previously developed land. Where developers are required to maintain buildings on site this can also lead to lower densities with developers unable to maximise the delivery of new homes on that land. It can also impact on the developers ability to meet other standards around

¹ [Water Ready](#), Future Homes Hub (2024)

outdoor space, BNG, space standards, accessible units. However, the policy as currently written only allows demolition on the basis that there would be greater carbon footprint resulting from demolition.

38. Therefore, the proposed presumptions against demolition should be deleted as it is not supported by national policy and will result in outcomes that are inconsistent with the aims and objectives of national policy to maximise delivery on pdl and increase densities wherever appropriate.
39. With regard to part 5 of the policy and the requirement for development of 150 or more dwellings to provide a circular economy statement for development of over 150 units, HBF does not consider this to be necessary. As noted above, the NPPF seeks to encourage the reuse of materials, but a decision maker does not require circular economy statement to make judgment on such matters. With small development a short statement in the Sustainability Statement or Design and Access Statement outlining how recycling material will be used in the delivery of the development would be sufficient to be consistent with national policy.
40. Finally, part 4 of the policy requires compliance with RECAP Waste Management Design Guide. As the council will be aware, local pan policies cannot give equal weight to documents that are not part of the development plan. As such the Council can suggest developers have regard to this guidance but they cannot require compliance with it or refuse development that does not meet any standards it sets.

CC/IW: Integrated Water management, Sustainable drainage and water quality

41. Part 6a of this policy requires development proposals to demonstrate that there is capacity for waste water treatment. As set out in our comments on paragraph 1 of CC/WE this is the responsibility of the water provider who has a statutory responsibility to provide these services and connect new homes to the waste water network. Section 106 of the WIA 1991 confers a power to connect to a public sewer. Section 106(1) states that the owner of any premises or the owner of any private sewer which drains premises, shall be entitled to have its drains or sewer communicate with the public sewer of any sewerage undertaker and therefore discharge foul water and surface water from those premises or that private sewer.
42. Specifically, in relation to wastewater, the Supreme Court considered this matter in 2009 – see Barratt versus Welsh Water [2009] UKSC 13. Paragraph 23 of the decision is salient. Given its importance in the context of wastewater, it is recited in full below:

“The right to connect to a public sewer afforded by section 106 of the 1991 Act and its predecessors has been described as an “absolute right”. The sewerage undertaker cannot refuse to permit the connection on the ground that the additional discharge into the system will overload it. The burden of dealing with the consequences of this additional discharge falls directly upon the undertaker and the consequent expense is shared by all who pay sewerage charges to the undertaker. Thus, in Ainley v Kirkheaton Local Board (1891) 60 LJ (Ch) 734 Stirling J held that the exercise of the right of an owner of property to discharge into a public sewer conferred by section 21 of the 1875 Act could not be prevented by the local authority on the ground that the discharge was creating a nuisance. It was

for the local authority to ensure that what was discharged into their sewer was freed from all foul matter before it flowed out into any natural watercourse.”

43. As we stated, in relation to water supply it is inappropriate to include a policy in the local plan requiring a housebuilder, or other applicants for development, to assess the capacity or otherwise of the water company to provide waste water connections as they are an attempt to get applicants to do things for which they are not legally responsible. Rather it is the responsibility of water companies, working with local authorities and the Environment Agency, to plan for the future demand for such services relating to the development requirements proposed in local plans. If the Council cannot show that there is sufficient waste water infrastructure to meet the level of development set out in the local plan, then it cannot be considered to be deliverable. HBF therefore consider it necessary for paragraph 6a to be deleted.

BG/BG: Biodiversity and geodiversity

44. HBF does not consider the policy requiring a major development to deliver 20% Biodiversity Net Gains (BNG). As the Council will be aware, the draft NPPF published for consultation at the end of last year indicates that the only time where it may be appropriate to seek more than 10% BNG through local policy relates to allocations, and even then, only where this is clearly evidenced and justified. This is a clear direction of travel with regard to BNG that there should not be general requirements for development to deliver beyond the 10% required by the Environment Act.

45. However, even if the approach being proposed in the draft NPPF is not taken forward HBF does not consider the approach to be justified. In considering the soundness of this policy it is necessary to consider paragraph 74-006-20240214 of PPG which states that:

“... plan-makers should not seek a higher percentage than the statutory objective of 10% biodiversity net gain, either on an area-wide basis or for specific allocations for development unless justified. To justify such policies, they will need to be evidenced including as to local need for a higher percentage, local opportunities for a higher percentage and any impacts on viability for development. Consideration will also need to be given to how the policy will be implemented”.

46. It is important to note that the starting point is that local plan should not seek a higher requirement. This is different to a permissive policy allowing local plans to seek a higher level of BNG where justified, and the HBF would argue that it should be considered a high bar with regard to the evidence required to justify such a policy. There must be a very clear and robust justification that the area is significantly worse than the country as whole and that this decline is directly related to the new development rather than, for example, the result of changes in agricultural practices or industrial pollution. It is not sufficiently robust to highlight declines in species that whilst an important issue is not necessarily as a result of new homes being built.
47. However, HBF could not find any justification in the plan or evidence base as to why development in Greater Cambridge should be delivering more than the 10% statutory requirements. The HBF does not disagree that the

UK has seen a loss in biodiversity not just in recent past but previous centuries and as such recognise the importance of ensuring that the outcome of new development in future is that there is a net gain in biodiversity. However, it is important to recognise that in recent years new residential development has not been the driver of declining biodiversity either locally or nationally and in particular over the last 50 years. The main drivers of declining biodiversity in England, as outlined in the State of Nature Report 2023 (State of Nature Partnership, 2023), as being “*Intensive management of agricultural land, largely driven by policies and incentives since World War II, has been identified as the most significant factor driving species’ population change in the UK*”. Therefore, whilst it is important for development to ensure that it improves the natural environment it is important to also recognise residential development is not a significant driver of biodiversity decline in Greater Cambridge. Similarly, the lack of national or internationally important protected areas or low percentages of open access land and accessible open green space, as outlined in paragraph 3.25 of the topic paper does not indicate that there is a local need for new development to deliver beyond the 10% required by statute. These reflect long term agricultural practices and as such there is no justification for requiring new development to address a problem it has not created.

48. The Council must also be able to show that the 20% net gain is viable and will not compromise the deliverability of sites or the local plan as a whole, and that if it is delivered wholly onsite there would be no material impact on the viability of development. However, what must be recognised by the Council with regard to BNG is that the approach to delivering either a 10% or 20% net gain in biodiversity is the type of habitat that is currently on site. On some sites it may be relatively simple to deliver 10% or 20% net gain. These could be on sites where there is minimal biodiversity or where the habitats are of low distinctiveness. However, on some sites this will not be the case. Habitats may be of a higher distinctiveness, and it may be more difficult to deliver BNG on site. In such cases meeting the 10% will be a challenge and 20% even more so with the likelihood that a significant proportion of the biodiversity units required to achieve 20% net gain will be delivered off site.
49. Where offsite delivery is required, it will mean costs increase due to the spatial risk multiplier. This does not appear to have been considered in the Viability Assessment with the consideration of costs relying on research undertaken to inform plan making in Essex, which relies heavily on the DEFRA impact assessment which significantly underestimates the cost of offsite credits and takes no account of the spatial risk multiplier. For example, offsite delivery in an adjoining local planning authority or national character area would require would increase the number of biodiversity units required by 1.5 and another part of England by 2. Given recent evidence from Biodiversity Units UK shows that offsite credits range from £25,000 to £190,000 the impact of the multiplier could be significant if delivery of BNG cannot be onsite or within the Greater Cambridge area. As such without an understanding of the baseline biodiversity on a site it is difficult to know what impact a 20% BNG requirement will have on viability. Due to this uncertainty HBF would suggest that rather than seek to go beyond the statutory requirement the Council should be working with developers to ensure that 10% can be delivered in a manner that maximises the benefits for local people.
50. The third paragraph in the policy states that where applicant is unable to deliver BNG wholly on site then

providing net gain offsite will be required and that the Councils will encourage this to be delivered within the borough. While encouraging development to deliver offsite gains within the borough or area identified in the LNRS is not inconsistent with national it is unnecessary as the spatial risk multiplier already provides such an incentive. Given there is a financial incentive to achieve this aim there is no need for this to be stated in planning policy.

51. If the 20% requirement is considered to be sound it will be necessary for soundness that flexibility is included in the local plan with regard to the percentage of net gain required above the statutory minimum. The policy should clearly state that where this is impacting the viability and deliverability of a development that any BNG requirement will be reduced to the 10% statutory minimum.

BG/GI Green and Blue infrastructure

52. Part 4 of this policy requires major development to meet in minimum greening factor of 0.4 and where this cannot be met on site the LPA will work with developers to identify opportunities to address this offsite. Firstly, HBF do not support the use of very specific metric such as this to define how much green space should be delivered on site. HBF recognises the need to provide and enhance green infrastructure on sites, but this can be adequately achieved without setting specific targets. Secondly, HBF could not find any assessment as other potential cost of such a policy or the impact it might have on the net developable area of a site nor any consideration as to the potential impact on the ability of sites to make the most efficient use of land in the urban area. As such the policy cannot be considered to be justified. Finally, it is unclear as to how the urban greening factor will interact with the requirement to deliver 10% BNG on site. There would appear be a potential overlap between the two requirements that will need to be clarified.

BG/TC: Improving treen canopy cover

53. As with the urban green factor HBF are concerns as to how this will impact on the developable area of a site or how it takes into account the type of habitat required to delivery BNG on site. HBF recognise the need to maintain existing trees where possible and promote street trees, but the level of provision should be based on the nature and location of the site rathe than applying an arbitrary 30% that is purely a recommendation of the Woodland Trust and not a specific target put forward by a statutory body. HBF would recommend that the 30% canopy cover on site is deleted.
54. Part 3a states that applicants will need to demonstrate how proposals will preserve protect or enhance existing trees and hedgerows on site. However, it must be recognised that it will not always be possible to preserve all the tress on site. There will be situations where some trees must be removed facilitate development or where trees are required dot be removed due to them being dangerous or infected with disease such as Ash die back. HBF would therefore recommend that at the start of 3a "*where possible has...*" is added. This would then reflect the Councils' statement in part 6 of the policy and paragraph 5.47 of the supporting text which recognises that in some instances it will be necessary to remove trees.

BG/PO: Protecting Open Spaces.

55. This policy requires any replacement open space to be fully available before the area of open space being replaced can be redeveloped. This is not an effective policy as in many cases it will not be practical or possible to replace an open space being redeveloped in the first instance. The timing of any replacement will need to take into account the delivery and phasing of a development and given that the replacement will be a condition of the permission granted there is sufficient certainty that replacement open space will be provided as part of the development.

BG/EO: Providing and enhancing open space

56. The Council say that they are currently exploring the potential require a standard for major residential development. HBF is not supportive of such standards as they often fail to take account of areas where there is surfeit of open spaces, play space and outdoor sports facilities and as such less the need for open space on site may be less than in an area where there is a lower level open space in the local area. For example, where there are play spaces with in close proximity to a development it may be a more effective approach for improvement to be made to those spaces rather than requiring provision on site. HBF would suggest the proposed standards in part 2 are not included in the local plan.

WS/NC: Meeting the needs of new and growing communities.

57. Part 4 requires residential sites of 200 or more dwellings or groups of smaller sites which cumulatively exceed this figure to be informed by detailed assessment of community needs and include strategies to meet those needs. Firstly, it is not clear how the council will define the area within which smaller developments will need to assess the potential impact and how such assessments will be undertaken. It is unlikely to be the case that all sites in an area will come forward at once leaving the first development to undertake the assessment as to the impact and then seek to address any identified infrastructure needs prior to other development coming forward. Such an approach is impractical and could fall foul of the test relating to planning obligations set out in paragraph 58 of the NPPF. HBF would therefore recommend that the requirements for groups smaller sites to assess needs is removed.

58. The policy should also provide clarity as to the assessment so community needs. This should be to assess the needs additional need created by the development and not be seeking to address any existing shortfalls within area as this would not necessarily be related directly to the development. At present policy reads as if the Council are seeking a wider assessment as to the needs of the community within which development is located rather than the needs resulting from that development and whether existing infrastructure is sufficient to meet those needs. This would appear to be in intention from the supporting text, but clarity must be provided in the policy to ensure the decision makers do not seek to require the provision of infrastructure that is not directly related to the development and necessary to make the development acceptable in planning terms.

H/SS: Residential Space Standards

59. This policy sets out the Council's intention to continue with the application of national described space standards (NDSS). Firstly, HBF do not consider it necessary to repeat the space standards in the local plan. This is unnecessary repetition of national policy and should be removed. Secondly, the Housing Topic Paper notes that since the introduction of the standard the majority of planning applications comply with NDSS. In addition, it is noted that the policy has been applied flexibly. To ensure that the policy continues to be applied flexibly HBF would suggest that some wording is added to the policy stating that this is the case.
60. Similarly, the requirement with regard to external space standards lack sufficient flexibility to take account of circumstances where they cannot be met. The Council state in the topic paper that some flexibility has been provided in terms of the form of the external space provided. HBF does not consider this to be sufficient. There should be a wider considerations as to the extent of any private external space standards such as viability and other site-specific circumstances such as the delivery of BNG on site which could restrict a developer's ability to meet the proposed external space standards.
61. The policy requires 10% of affordable units and 5% of market homes on sites of more than 20 homes to be built to part M4(3). This is on the basis of the statement in paragraph 11.105 of the Housing Needs of Specific Groups report. However, the overall need for such homes in table 11.14 outlines that the need for such homes is 968 across Greater Cambridge – just 2% of overall housing need over the plan period. Based on the new sites allocated in this local plan and the fact that sites allocated for development from previous plan the number of accessible homes is likely to substantially exceed what is needed leaving developers with homes that are difficult to sell on the general market. HBF recognises that there is need for some market homes to be built for wheelchair users however this must be based on evidence with a reasonable chance that these will be bought by those who needed them.

H/SH: Specialist housing

62. What is not clear from the local plan or evidence base is whether the Council have allocated any specific sites provide specialist housing needs. While HBF notes that paragraph 63-013 of PPG states that it is up to the plan making body to decide whether to allocate sites for specialist accommodation it does note that allocating sites provides greater certainty for developers and is more likely to see provision of such development in suitable locations. Given the aging population and the pressure on the housing market HBF consider it essential that specific allocations are made in sustainable locations to meet the needs of older people. Only through allocated sites can the council be certain that the needs for older people will be met in the right locations.
63. Alongside taking a positive approach to allocations the Council should also establish a more positive decision-making framework for older peoples housing. Paragraph 63-006 outlines that in setting clear policies local planning authorities should consider setting out an indicative figures or a range for the number of units of specialist housing for older people needed across the plan area throughout the plan period. HBF would consider this to be essential for any positive policy relating to older peoples housing as it assists decision makers in understanding how many homes are needed across Greater Cambridge to meet the needs of older people and

ensure that they take a positive approach to supporting applications for such accommodation. Where needs are not being met the policy should also state that the Council will apply a presumption in favour of development.


H/CB: Self and Custom Build.

64. The policy requires development of 20 or more units to provide at least 5% of homes as self and custom build. This is based on the number of entries on the Self Build Register which indicates a significant shortfall in the number of self-build home the councils must permit in each base period. However, what is notable is that in the latest base period the number of annual entries has fallen drastically following the application of a small administration fee. This would suggest that the level of demand for self-build may not be as high as earlier base period suggest. It will therefore be essentially that a full review of the register is undertaken to understand whether those on the register are still looking to build their own home.
65. HBF continue to consider the 20-unit threshold is too small as they will be delivered alongside market homes with a failure to develop plots having a far greater impact than on much larger sites where there is more opportunity to separation. The complexity and logistics of developing such sites alongside self-builders could also create significant difficulties. Often there are multiple contractors and large machinery operating on-site, the development of single plots by individuals operating alongside this construction activity raises both practical and health & safety concerns. Unsold plots should not be left empty to the detriment of neighbouring dwellings or the whole development. Any differential between the lead-in times/build out rates of self & custom build plots and the wider site may lead to construction work outside of specified working hours, building materials stored outside of designated compound areas and unfinished plots next to completed/occupied dwellings resulting in customer dissatisfaction. As such we would suggest that if there is to be requirement to provide plots for self-build plots it is on much larger sites.

Future Engagement

66. I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider housebuilding industry.
67. The HBF would like to be kept informed of all forthcoming consultations upon the Local Plan and associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



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