

**WYRE FOREST LOCAL PLAN EXAMINATION**  
**MATTER 11 – TRANSPORT & ACCESSIBILITY, RENEWABLE & LOW**  
**CARBON ENERGY AND VIABILITY**

**Inspector’s issues and questions in bold type.**

This Hearing Statement is made for and on behalf of the HBF, which should be read in conjunction with our representations to the pre submission Local Plan consultation dated 17<sup>th</sup> December 2018. This representation answers specific questions as set out in the Inspector’s Matters, Issues & Questions document (ED16) published on 19<sup>th</sup> October 2020.

**11.3 (i) Is Policy 24B on renewable and low carbon energy justified, effective and consistent with national planning policy?**

Policy 24B requires that new development incorporates renewable and low carbon energy technology to generate at least 10% of the development’s energy needs.

It is commendable for the Council to seek to deliver renewable and low carbon energy, however it is important that the Council’s proposed policy approach does not conflict or go beyond the Government’s proposals for Building Regulations. As set out in The Future Homes Standard consultation (ended on 7<sup>th</sup> February 2020), the Government intends to future proof new homes with low carbon heating and world-leading levels of energy efficiency by uplifting standards for Part L (Conservation of Fuel & Power) and changing Part F (Ventilation) of the Building Regulations.

The HBF recognise and support the need to move to The Future Homes Standard but there are difficulties and risks to housing delivery given the immaturity of the supply chain for the production / installation of heat pumps, and the additional load that would be placed on local electricity networks when coupled with Government proposals for the installation of electric vehicle charging points (EVCP) in new homes. The HBF and its Members favour adoption of a stepped and incremental approach to achieving the Government’s ambitions because of the need for supply chain and infrastructure investment and skills training. The consensus of HBF Members is that Option 1 (20% reduction in emissions from higher fabric efficiency standards) should be implemented first, with Option 2 (31% reduction in carbon emissions compared to the current Part L 2013 requirements) being implemented two to three years later.

The HBF contend that the requirement set out in Policy 24B is unnecessary given the Government’s proposals for Parts F and L of the Building Regulations. This requirement should be deleted.

If Policy 24B is retained, the Council’s requirement should not compromise the viability of development. The Council’s Viability Assessment Update

(IFT06) includes no costs for the requirements of Policy 24B. The Pre-submission Viability Note (IFT05) only included a cost of £1,750 per dwelling but this assessment only tested strategic sites rather than a full range of site typologies. The Government estimated the cost of its Future Homes Standard as £2,557 per dwelling for Option 1 and £4,847 per dwelling for Option 2.

The Council's policy approach should also recognize that these requirements may not be physically appropriate or practical on all sites. If retained reference to practical feasibility should be added to make Policy 24B flexible and therefore more effective.

Policy 24B also requires all new developments to include EVCPs.

The Department of Transport consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings (ended on 7<sup>th</sup> October 2019) set out the Government's preferred option to introduce a new requirement for EVCPs under Part S of the Building Regulations. The inclusion of these requirements within the Building Regulations will introduce a standardised consistent approach to EVCPs in new buildings across the country.

The HBF recognise that electric vehicles will be part of the solution to transitioning to a low carbon future. However given the Government's proposals for Part S of the Building Regulations, the requirement set out in Policy 24B is unnecessary, which should be deleted.

If Policy 24B is retained, the Council's requirement should not compromise the viability of development. The supply from the power grid is already constrained in many areas across the country. The HBF and its Members have serious concerns about the capacity of the existing electrical network in the UK. Major network reinforcement will be required across the power network to facilitate the introduction of EVCPs and the move from gas to electric heating as proposed under the Future Homes Standard. These costs can be substantial and can drastically affect the viability of developments. If developers are funding the potential future reinforcement of the National Grid network at significant cost, this will have a significant impact on their businesses and potentially jeopardise future housing delivery.

The Council's Viability Assessment Update (IFT06) includes no costs for the requirements of Policy 24B for EVCPs. The Pre-submission Viability Note (IFT05) included a cost of only £300 per dwelling and no costs for upgrading local electricity networks. Furthermore, this assessment only tested strategic sites rather than a full range of site typologies. The Government estimated an installation cost of approximately £976 per space plus any costs for upgrading local electricity networks, which under the Government's proposal automatically levies a capped figure of £3,600 on developers therefore this figure should also be included in any viability impact assessment.

The HBF consider physical installation of fixed EVCPs is unnecessary. The evolution of this automotive technology is moving quickly therefore a cable and duct approach is a sensible and future proofed solution, which negates the potential for obsolete technology being experienced by householders. The

Council should consider a cable and duct only approach, which means that the householder can later arrange and install a physical EVCP suitable for their vehicle and in line with the latest technologies.

If Policy 24B is retained, reference to practical feasibility and viability should be added to provide a more flexible and effective policy approach.

**11.4 Does Policy 18A and the supporting text on financial viability require modification to better reflect the approach in the national Planning Practice Guidance and take account of caselaw?**

Policy 18A and its supporting text should be modified for consistency with 2019 NPPF and latest NPPG.