

Home Builders Federation

Matter 6 – Infrastructure, Transport and Healthy Communities

Matter 6, Issue 1 – Whether the approach to Infrastructure Provision is legally compliant, justified, effective, consistent with national policy and positively prepared?

Q1. Is Strategic Policy 23: Infrastructure Provision sound?

- a) Does this policy apply to both development sites allocated in the Plan and other sites not identified in the Plan?
- b) Is the relationship between this policy and the site specific infrastructure requirements identified for each site allocation clear?
- c) Is this policy sufficiently flexible to deal with and respond to changing circumstances?
- d) Would this policy potentially prevent development proposed in the Plan from being built as envisaged and if so, how will this be addressed?

While this policy does not require a capacity assessment with regard to wastewater infrastructure through the document the need to assess capacity on a site by site basis is mentioned. For example in the opening to chapter 5 the 7th bullet states: “Any development proposals will need to consider the capacity on existing wastewater treatment works and the ability of these sites to expand in the future” similar the opening to chapter 6 states: “New development will need to ensure that increased levels of wastewater are treated to ensure that there is no further deterioration in these levels and that enhancements are made where possible”. However, where there is a statutory undertaking to provide the necessary infrastructure the decision maker must be able to assume that there is capacity and that the necessary infrastructure is or will be in place to support the proposed development.

HBF recognises the importance of ensuring infrastructure is in place to support new development, but this should be established with the statutory provider as part of the



plan making process. As set out in paragraph 188 of the NPPF planning decisions should assume that these regimes operate effectively and as such additional capacity assessments should not be required. Where additional infrastructure is required to support a specific development, this will need to be set out in the relevant allocation to ensure that this can be taken into account.

Q3. Is Policy 25: Parking sound, particularly with regard to standards not detailed within the Plan?

HBF consider this to be unsound as it seeks to require development to meet standards that are set outside of the local plan. The policy can set out where guidance on parking standards can be found but if it is to require a development to meet a specific standard then these should be set out the plan itself.

Q5. Is Strategic Policy 27: Inclusive Communities, Health and Wellbeing sound?

a) Is this policy effective when read alongside other policies in the Plan?

No further comments to our representations

Q6. Is Policy 28: Community Facilities, Leisure and Recreation sound?

a) Does this policy apply only to land and buildings that are publicly accessible? Is this policy consistent with paragraph 99 of the NPPF?

No further comments to our representations

Mark Behrendt MRTPI

Planning Manager – Local Plans SE and E

