

**EXAMINATION OF BROXTOWE LOCAL PLAN PART 2**  
**MATTER 12 – DEVELOPMENT MANAGEMENT POLICIES**

**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 Part 2 consultation dated 3<sup>rd</sup> November 2017. This representation answers specific questions as set out in the Inspector's Matters, Issues & Questions document.

**Issue : Are the relevant policies justified, effective and consistent with national policy?**

**Policy 17 Place Making, Design and amenity**

**1. Is this policy justified and effective?**

**2. Is the requirement to score green on 9 out of 12 Building for Life 12 criteria appropriate and justified? Does it go further than the recommendations in this design guide?**

The requirement for inclusion of a Building for Life 12 assessment as part of a Design & Access Statement submission for developments of 10 or more dwellings in Bullet Point (2) of Policy 17 and the achievement of at least 9 greens in the monitoring of this Policy goes beyond the recommendations of this Design Guide. Building for Life 12 uses a traffic light system rather than a points score. A well designed scheme should perform well against all 12 of the questions. The HBF is supportive of the use of Building for Life 12 as best practice guidance to assist Local Planning Authorities, local communities and developers assess new housing schemes but it should not be included as a Local Plan policy requirement which obliges developers to use this tool. The use of Building for Life 12 should remain voluntary. This requirement should be deleted.

**Policy 20 Air Quality**

**1. Is it sufficiently clear what the 'reasonable steps' would be to meet the requirement of part 1 of the policy? What is the relationship between this part of Policy 20 and the requirement for a Travel Plan in Policy 26?**

The requirement for electric vehicle charging points in all housing developments of 10 or more dwellings under Bullet Point (3) is not justified. The Council has not determined that network capacity exists if a proportion of dwellings have a re-charge facility. If re-charging demand became excessive there may be constraints to increasing the electric loading in an area because of the limited size and capacity of existing cables and new sub-station

infrastructure may be necessary. As such costs have not been viability tested by the Council there may be an adverse impact on housing delivery. If electric vehicles are to be encouraged by the Government, then a national standardised approach implemented through the Building Regulations would be more appropriate. The Council should be wary of developing its own policy and await the outcome of the Government's proposed future consultation to be undertaken by the Department of Transport later this year. This requirement should be deleted.

## **Policy 26 Travel Plans**

### **1. Is the threshold for preparation of a Travel Plan in this policy justified by the available evidence?**

The requirement for submission of a Travel Plan for all residential developments of more than 10 dwellings without any specific evidence that an individual scheme is likely to have a significant impact is not justified. Any requirement for a Travel Plan should be based on a proportionate level of detail in relation the scale and type of development proposed. The Council has not justified the proposed threshold of more than 10 dwellings in Policy 26. This requirement should be deleted.