

**From:** Mark Behrendt [REDACTED]  
**Sent:** 31 August 2021 08:49  
**To:** Planning Policy <planning.policy@tendringdc.gov.uk>  
**Subject:** Main modifications

Please find attached the HBF's comments on the main modifications to the Tendring Local Plan. I would be most grateful if you could confirm receipt of this email and its attached letter.

Regards

Mark Behrendt  
Local Plans Manager SE and E



HOME BUILDERS FEDERATION

**t:** [REDACTED]  
**m:** [REDACTED]  
**e:** [REDACTED]  
**a:** HBF House, 27 Broadwall, London SE1 9PL



**HBF London Office closed**

Due to the coronavirus the HBF office is temporarily closed.  
All HBF staff are contactable via the usual channels and business will continue as near to normal as possible.

This e-mail is confidential, and may be legally privileged. If you are not the intended recipient, do not copy, use or disclose its content, but contact the sender immediately.  
Whilst we run anti-virus software on all Internet emails we are not liable for any loss or damage sustained as a result of software viruses. The recipient is advised to run their own anti-virus software.

Registered in England and Wales | Registered office: 27 Broadwall, London, SE1 9PL  
Company Reg No. 276 4757 | Vat No. 882 6294 86

Sent by email to: [planning.policy@tendringdc.gov.uk](mailto:planning.policy@tendringdc.gov.uk)

31/08/2021

Dear Sir/ Madam

### **Response by the Home Builders Federation to the consultation on the main modifications to the Tendring Local Plan**

Thank you for consulting the Home Builders Federation (HBF) on the main modifications to the Tendring Local Plan. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.

#### **MM13.3**

Whilst we support modification MM13.1 to provide flexibility in the application of policy LP5 this is not then addressed in the modifications to the policy itself. It is important for the sake of clarity and consistency with the NPPF that this flexibility is reflected in LP5. However, whilst the tracked change version of the modified local plan submitted alongside the schedule of main modifications continues to state that provision of 30% affordable housing is required subject to viability the medication does not do so. We raised this in the hearings stating that the phrase “subject to viability testing” should not be removed from the policy. This phrase ensures internal consistency between MM13.1 and the policy itself and as such should be retained.

#### **MM37.2**

Whilst the HBF recognises the importance of improving energy efficiency of new homes it is necessary for policies to recognise the need to transition between the current building regulations and the higher standards that are being proposed by Government to be introduced through the future homes standard in 2025. The Council’s amended policy requires developers to show how development have maximised opportunities with regard to renewable energy and energy efficiency. To support these changes the Council are proposing a new paragraph 7.10.3 outlining the type of measures that could and should be used. However, we do not consider the wording of this new paragraph to be sound as it not only suggests what measures could be included but also states that they should be included. The intention of the Council’s policy is not that all these measures should be incorporated but for them to



be included where appropriate. As such we would suggest the following amendment to this policy to provide appropriate clarity and consistency with policy PPL10.

“The REGP must demonstrate how different measures have been considered and, where appropriate, incorporated. Such measures to be considered include: which could and should include:“

Yours faithfully



Mark Behrendt MRTPI  
Planning Manager – Local Plans  
Home Builders Federation  
Email: [REDACTED]  
Tel: [REDACTED]