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Dear Sir / Madam

GREATER NOTTINGHAM STRATEGIC PLAN (GNSP) – GROWTH OPTIONS CONSULTATION

Introduction

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes 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. We would like to submit the following responses to specific questions in the GNSP's consultation document.

Vision and Spatial Objectives

Question INT1 : Are there any other issues the Vision and Spatial Objectives should address?

The HBF is supportive of a comprehensive approach to strategic planning across the whole of Greater Nottingham. The strategic and comprehensive planning of Greater Nottingham should encompass Broxtowe, Erewash, Gedling, Nottingham, Rushcliffe and Hucknall area of Ashfield (see para 1.6) however Figure 1.1 excludes Hucknall from the GNSP area. This exclusion is inconsistent with the vision and spatial objective of achieving comprehensive strategic planning across Greater Nottingham.

This comprehensive approach should include the co-ordination of plan end dates, which should be the same rather than different. The proposed Erewash Local Plan Review end date is 2037 (see para 1.5) whilst the GNSP end date is 2038 (see para 1.8).

It is also necessary for future plan-making across Greater Nottingham to be carried out as expeditiously as possible. The Greater Nottingham Aligned Core



Strategy (ACS), the Rushcliffe Local Plan Part 1 Core Strategy and the Erewash Local Plan were all adopted in 2014 (see Figure 1.2), these Plans are now more than five years old and not yet reviewed.

Detailed HBF responses are provided to the following identified issues, which the Vision & Spatial Objectives will address :-

- climate change & carbon neutrality (see HBF answer to Question OS5);
- the quantum & right type of new homes (see HBF answers to Questions OS6, H1, H2 & H3) ;
- net environmental gain (see HBF answer to Question GB13) ; and
- well-designed new homes & good place-making (see HBF answer to Question D1).

Evidence Base

Question INT2 : Do you think there is any additional evidence required to support the Plan?

As set out in the 2019 National Planning Policy Framework (NPPF), all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). If policy requirement options such as optional technical standards and / or prescriptive housing type / tenure mixes are to be pursued, detailed additional evidence to support and justify such policy requirements should be gathered.

Strategic Issues

Question INT3 : Are there any other Strategic Issues we should consider?

The strategic issues outlined are consistent with the 2019 NPPF (para 20). Any implications arising from the Covid-19 pandemic should be taken into consideration as a strategic issue.

Urban Intensification Growth Strategy Option

Question OS1 : Should we focus growth in and adjacent to the urban area as far as practical to meet development needs?

The GNSP should ensure the availability of a sufficient supply of deliverable and developable land to deliver Greater Nottingham's housing requirement. The sufficiency of the housing land supply should meet the housing requirement, ensure the maintenance of a 5 Years Housing Land Supply (YHLS) and achieve Housing Delivery Test (HDT) performance measurements.

The Urban Intensification Growth Strategy Option focuses development within and adjoining the main built up area of Nottingham by re-using previously developed land and increasing densities. Any unaccommodated development

is allocated as Sustainable Urban Extensions (SUEs) on the edge of the Nottingham urban area.

There are disadvantages to pursuing any proposed Growth Strategy Option in isolation. The Urban Intensification Growth Strategy Option is unlikely to meet all development needs due to the restricted capacity of the urban area and insufficient availability of brownfield sites.

Furthermore, higher densities are only appropriate in certain locations. The setting of residential density standards should be undertaken in accordance with the 2019 NPPF (para 123), whereby in the circumstances of an existing or anticipated shortage of land for meeting identified housing needs then a minimum net density in suitable locations such as town centres and those benefiting from good public transport connections may be appropriate. A blanket approach to increasing housing densities within or adjoining the main urban area will provide insufficient variety in house typologies to create the right types of new homes to meet the housing needs of different groups. A range of density standards specific to different areas of Greater Nottingham will be necessary to ensure that any proposed density is appropriate to the character of the surrounding area. Any consumer preferences against high density urban living caused by the Covid-19 lockdown should also be considered.

The preferred Growth Strategy of the GNSP is most likely to be a combination of two or more proposed Growth Strategy Options therefore urban intensification should be considered as part of a combination of proposed Growth Strategy Options.

More Dispersed Growth Strategy Option

Question OS2 : Should we opt for more dispersed growth, expanding existing settlements or developing new settlements within or beyond the Green Belt?

The More Dispersed Growth Strategy Option focuses on expanding existing settlements located within or beyond the Green Belt, which may also include the development of a new settlement in the form of a garden community.

A more dispersed pattern of development will support local communities living in smaller towns and rural villages. A dispersed distribution of growth will also diversify housing land supply (HLS) and optimise housing delivery. However, the possible proposal for a new garden community would have a long lead in time, which should be complimented by smaller non-strategic housing allocations in the short to medium term to ensure a continuous HLS.

There are disadvantages to pursuing any proposed Growth Strategy Option in isolation. The preferred Growth Strategy of the GNSP is most likely to be a combination of two or more proposed Growth Strategy Options therefore more dispersed growth should be considered as part of a combination of proposed Growth Strategy Options.

Green & Blue Infrastructure-Led Growth Strategy Option

Question OS3 : Should we continue to prioritise development that can enhance the strategic river corridors, canal corridors, the Greenwood Community Forest and urban fringe areas, and/or prioritise other GBI assets?

The Green & Blue Infrastructure-Led Growth Strategy Option priorities delivering new green and blue infrastructure in association with major new development, which focuses development along strategic river corridors with higher associated flood risks and increases potential harm to existing protected wildlife sites from greater visitor numbers.

The enhancement and protection of Green & Blue Infrastructure and the wider ecological network should be addressed via individual strategic allocations and policies rather than as a Growth Strategy Option.

Transport-Led Growth Strategy Option

Question OS4 : To what extent should the location of development relate to existing and proposed transport infrastructure?

The Transport-Led Growth Strategy Option is influenced by planned transport improvements (possibly including extensions to the Nottingham Express Transit (NET)) and locations with the potential for improvements such as the East Midlands HS2 Hub Station at Toton. This requires significant levels of investment in the NET and prioritising developer contributions to transport over and above other infrastructure.

There are disadvantages to pursuing any proposed Growth Strategy Option in isolation. The preferred growth strategy of the GNSP is most likely to be a combination of two or more proposed Growth Strategy Options. Sustainable transportation will be a consideration in the combination of urban intensification and more dispersed growth as a preferred Growth Strategy.

Climate change

Question OS5 : How can we address climate change and in particular drive the area to becoming 'carbon neutral' within the Plan period?

Becoming carbon neutral within the plan period is identified as an objective of the GNSP. Each Council has set a its own local target ahead of the national target of 2050 by which to achieve carbon neutrality. These local targets are 2027 in Broxtowe, 2028 in Nottingham and 2030 in Gedling & Rushcliffe (see para 2.19).

Today's new homes are very energy efficient with lower heating bills for residents compared to existing older homes. The HBF support moving towards

greater energy efficiency via a nationally consistent set of standards and a timetable for achieving any enhancements, which is universally understood and technically implementable. The HBF acknowledges that the Government has not enacted its proposed amendments to the Planning & Energy Act 2008 to prevent the Councils from stipulating energy performance standards that exceed the Building Regulations but consider that the Councils should comply with the spirit of the Government's intention of setting standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of every Council setting out its own approach to energy efficiency, which undermines economies of scale for manufacturers, suppliers and developers.

Recently, the Government held a consultation on The Future Homes Standard (ended on 7th February 2020). The UK has set in law a target to bring all its greenhouse gas emission to net zero by 2050. New and existing homes account for 20% of emissions. It is the Government's intention to future proof new homes with low carbon heating and world-leading levels of energy efficiency. The Government's consultation addressed :-

- options to uplift standards for Part L (Conservation of Fuel & Power) and changes to Part F (Ventilation) Building Regulations ;
- transitional arrangements to encourage quicker implementation ; and
- clarifying the role of Councils in setting energy efficiency standards.

The HBF's response to the Government's consultation recognises and supports the need to move to The Future Homes Standard but the Government's preferred Option 2 for a 31% reduction in carbon emissions compared to the current Part L 2013 requirements in 2020 would be difficult and risky to deliver 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 the Government's Option 1 for a 20% reduction in emissions in 2020 (involving higher fabric efficiency standards than Option 2) and then a further step to Option 2 standards by 2023, which would allow more time for the supply chain to gear up for the scale of demand entailed. The HBF submission argues that *"a stepped and incremental approach should be adopted given, in particular, the large requirement for supply chain and infrastructure investment and skills training to support this ambition. The consensus is that Option 1 should be implemented within 2020, with Option 2 being implemented within two to three years in approximately 2023. Our membership sees that transitional arrangements around this implementation should be 18 – 24 months"*.

It is the HBF's opinion that the Councils should not be getting ahead of the Government's proposals for national policy.

Amount of New Housing

Question OS6 : What, if any, factors (that can be evidenced) justify planning for more or fewer new homes than the standard methodology suggests?

Under the 2019 National Planning Policy Framework (NPPF), the Councils should establish a housing requirement figure for their whole area (para 65). As set out in the 2019 NPPF, the determination of the minimum number of homes needed should be informed by a Local Housing Needs (LHN) assessment using the Government’s standard methodology unless exceptional circumstances justify an alternative approach (para 60). The standard methodology is set out in the latest National Planning Practice Guidance (NPPG). In Greater Nottingham, there are no exceptional circumstances to justify an alternative approach.

The Table below (extract from Appendix 1) shows the minimum LHN for Greater Nottingham. The calculation is based on 2014 Sub National Household Projections (SNHP), 2019 as the current year and 2019 affordability ratio.

	LHN (dwellings per annum)
Broxtowe	368
Gedling	458
Nottingham	1149
Rushcliffe	604
GNSP	2579
Erewash	392
Total	2971

As set out in the NPPG, the LHN is calculated at the start of the plan-making process however this number should be kept under review until the Local Plan is submitted for examination and revised when appropriate (ID 2a-008-20190220). The minimum LHN may change as inputs are variable and this should be taken into consideration by the Councils. The Government has also confirmed its intention to review the standard methodology. Currently the Government is consulting on a new standard methodology (ends on 1 October 2020). If the Government’s proposed new standard methodology comes into effect, then the LHN assessment should be revised. The Table below shows the revised LHN, which is higher than shown in the Table above.

	Revised LHN (dwellings per annum)
Broxtowe	490
Gedling	534
Nottingham	897
Rushcliffe	1054
GNSP	2975
Erewash	344
Total	3319

The Government's standard methodology identifies the minimum annual LHN. It does not produce a housing requirement figure (ID : 2a-002-20190220). LHN assessment is only the minimum starting point. The Government's objective of significantly boosting the supply of homes as set out in the 2019 NPPF remains (para 59). Any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere may necessitate a housing requirement figure above the minimum LHN. The Councils should consider a housing requirement above the minimum LHN in the following circumstances :-

- the NPPG indicates that if previous housing delivery has exceeded the minimum LHN, this level of delivery may be indicative of greater housing need (ID : 2a-010-20190220). In 2018/19, 3,126 dwellings were completed, which is in excess of the minimum LHN ;
- if future jobs growth will generate a need for an increased labour supply to meet increasing employment demand, this will in turn lead to a need for new homes to accommodate the new population. The minimum LHN may not provide sufficient workers to align with forecast jobs growth ;
- the NPPG sets out that households whose needs are not met by the market, which are eligible for one or more of the types of affordable housing set out in the definition of affordable housing in Annex 2 of the 2019 NPPF are considered to be in affordable housing need (ID : 67-005-20190722). The Councils should calculate affordable housing need as defined by the NPPG. This figure may be significant in comparison to the minimum LHN. The NPPG also states that total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments. As set out in the NPPG, an increase in the total housing figure may be considered where it could help deliver affordable housing (ID : 2a-024-20190220). It is acknowledged that the Councils may not be able to meet all affordable housing needs but a housing requirement figure uplifted above the minimum LHN will contribute towards meeting as much affordable housing need as possible ;
- As set out in the 2019 NPPF, the GNSP should be positively prepared and provide a strategy which as a minimum seeks to meet its own LHNs in full and is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated (para 35a). As set out in the NPPG, an agreed position on housing needs should be set out in a Statement of Common Ground (SoCG) (NPPG ID : 61-010-20190315). This SoCG should be publicly available by the time of publication of a Draft Plan (ID : 61-020-20190315).

In Greater Nottingham, there are no over-riding environmental constraints to justify a housing requirement figure lower than the minimum LHN. The GNSP should be aiming to maximise the economic potential of the sub-region by capitalising on existing and planned investment in infrastructure.

Growth Options

Question OS7 : Which of the broad areas of search identified in the Growth Options Study do you prefer, and why?

The HBF have no preference for any broad areas of search identified in the Growth Options Study. The GNSP should ensure the availability of a sufficient supply of deliverable and developable land to deliver Greater Nottingham's housing requirement. The sufficiency of HLS should meet the housing requirement, ensure the maintenance of a 5 YHLS and achieve HDT performance measurements.

It is noted that annual completion rates are below the anticipated delivery rates set out in the stepped trajectories of the adopted ACS resulting in a cumulative housing shortfall. The HLS should incorporate a contingency to provide additional flexibility. There is no numerical formula to determine an appropriate contingency quantum but if the GNSP is highly dependent upon one or relatively few large strategic sites or settlements / locations then greater numerical flexibility will be necessary than in a case where HLS is more diversified. The HBF always suggests as large a contingency as possible (at least 20%) to treat the housing requirement as a minimum rather than a maximum, to provide optimum flexibility to response to changing circumstances as well as providing greater choice and competition in the land market. Between 2018 – 2038, the latest estimate of supply is 61,953 dwellings against a minimum LHN of 59,420 dwellings (see Appendix 1). This provides a surplus of only 2,533 dwellings (4%).

Site Assessments

Question OS9 : Do you prefer any of the sites at Appendix 2, and why?

The HBF have no preference for any of the sites listed in Appendix 2. The HBF have no comments on individually identified sites but the correct assessment of availability, suitability, deliverability, developability and viability of these sites is critical. Assumptions on lapse rates, non-implementation allowances, lead in times and delivery rates contained within the overall HLS, 5 YHLS and housing trajectory should also be realistic and supported by relevant parties including landowners and developers.

The overall HLS should include a short and long-term supply of sites by the identification of both strategic and non-strategic allocations for residential development. Housing delivery is optimised where a wide mix of sites is provided, therefore strategic sites should be complimented by smaller non-strategic sites. The widest possible range of housing sites by both size and market locations should be sought to provide suitable land for small local, medium regional and large national housebuilding companies. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. Housing delivery is maximised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to

diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice / competition in the land market.

Under the 2019 NPPF, the Council should identify at least 10% of its housing requirement on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 68).

Safeguarded Land

Question OS10 : Should this Plan designate Safeguarded Land within the Green Belt? If so, where?

The GNSP should designate safeguarded land within the Green Belt.

Biodiversity Net Gains

Question GBI3 : How should we ensure new developments achieve net gains in biodiversity?

It is the HBF's opinion that the Councils should not deviate from the Government's proposals on biodiversity gain. In 2019 Spring Statement, the Government announced that it would mandate net gains for biodiversity in the forthcoming Environment Bill. This legislation will require development to achieve a 10% net gain for biodiversity. It is the Government's opinion that 10% strikes the right balance between the ambition for development and reversing environmental decline. 10% gain provides certainty in achieving environmental outcomes, deliverability of development and costs for developers. 10% will be a mandatory national requirement, but it is not a cap on the aspirations of developers who want to voluntarily go further or do so in designing proposals to meet other local planning policies. The Government will use the DEFRA Biodiversity Metric to measure changes to biodiversity under net gain requirements established in the Environment Bill. The mandatory requirement offers developers a level playing field nationally and reduced risks of unexpected costs and delays.

The Government will introduce exemptions applicable to only the most constrained types of development. Exemptions will be set out in secondary legislation.

The Environment Bill will introduce new duties to support better spatial planning for nature through the creation of Local Nature Recovery Strategies (LNRSs). LNRS will detail existing areas of high biodiversity value as well as those areas where habitat creation or restoration would add most value. The intention is that the whole of England will be covered by LNRSs with no gaps or overlaps. Each LNRS will include a statement of biodiversity priorities for the area covered by the strategy and a local habitat map that identifies opportunities for recovering or enhancing biodiversity. Each LNRS will be produced locally, with a relevant public body appointed as the responsible authority by the Secretary of State.

This will achieve the best combination of local ownership and knowledge and national consistency and strategy. Such spatial environmental mapping will help developers to locate their sites strategically to avoid biodiverse sites that would be difficult to achieve net gain on.

The Government will require net gain outcomes to be maintained for a minimum of 30 years and will encourage longer term protection, where this is acceptable to the landowner. The Government will legislate for Conservation Covenants in the Environment Bill.

The Environment Bill will make provision for local decision makers to agree biodiversity net gain plans with developers. Where offsite compensation is required, Councils will be able to review developers plans to deliver compensation through local habitat creation projects. Where suitable local projects are not available, there will be the option for investment in nationally strategic habitats. The Government will make provision for statutory biodiversity units in the Environment Bill, which will be purchasable at a set standard cost. This approach will allow Councils, landowners and organisations to set up habitat compensation schemes locally, where they wish to do so, where this is not the case, the Government will provide a last-resort supply of biodiversity units. The Government's proposals for statutory biodiversity units will provide a recourse for developers and Councils, where local habitat compensation schemes are not available, therefore preventing delays to development.

There are significant additional costs associated with biodiversity gain, which should be fully accounted for in the Councils viability assessment. The DEFRA Biodiversity Net Gain & Local Nature Recovery Strategies : Impact Assessment Table 14 : Net Gain Delivery Costs (Residential) sets out regional costs (based on 2017 prices) in East Midlands of £19,951 per hectare of development based on a central estimate but there are significant increases in costs to £69,522 per hectare for off-site delivery under Scenario C. There may also be an impact on gross / net site acreage ratio. The Government is committed to continued engagement with the housebuilding industry to address concerns and risks. The Government has confirmed that more work needs to be undertaken to address viability concerns raised by the housebuilding industry in order that net gain does not prevent, delay or reduce housing delivery.

The Government will make provision in the Environment Bill to set a transition period of two years. The Government will work with stakeholders on the specifics of this transition period, including accounting for sites with outline planning permission, and will provide clear and timely guidance on understanding what will be required and when.

Principle of the Nottingham-Derby Green Belt

Question GB1 : Should the principle of the Nottingham-Derby Green Belt be maintained?

The principle of the Nottingham-Derby Green Belt should be maintained where the five purposes for Green Belt as set out in 2019 NPPF (para 134) are served.

Approach to the Green Belt

Question GB2 : Are there any other considerations that should direct development towards Green Belt areas rather than non-Green Belt areas (including ‘Safeguarded Land’)?

As set out in 2019 NPPF (paras 136 & 137), where fully evidenced and justified Green Belt boundaries can be altered in “exceptional circumstances” through the preparation or updating of Local Plans. The GNSP should support economic / housing growth and promote sustainable patterns of development and travel across Greater Nottingham. The LHN is a minimum figure, which should be met in full (see para 4.11). Green Belt boundaries are tightly drawn around Greater Nottingham (see paras 4.7 – 4.9) therefore some release of Green Belt land will be necessary (see para 4.12). A strategic review of the Green Belt should be undertaken. Detailed consideration should be given to opportunities for sustainable development adjacent to urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt and locations beyond the outer Green Belt boundary (see para 4.15).

Affordable Housing

Question H1 : What approach should we take to affordable housing?

The GNSP’s policy approach to affordable housing should be consistent with the 2019 NPPF’s promotion of affordable home ownership by requiring at least 10% of new dwellings built to be available for this tenure leaving only the remainder for other affordable housing tenures (para 64). Currently, the Government is consulting on delivery of First Homes (ending on 1st October 2020), which should also be considered in the GNSP’s policy approach to affordable housing.

At the plan-making stage, deliverability of development is very closely linked to viability. The viability of individual developments and plan policies should be tested at the plan making stage. As set out in the 2019 NPPF, viability testing should assess the cumulative impact of affordable housing provision, policy compliant standards, infrastructure and other contributions so that there is sufficient incentive for a reasonable landowner to bring forward their land for development. Development should not be subject to such a scale of obligations that the deliverability of the GNSP is threatened (para 34). Viability assessment should not be conducted on the margins of viability. The full economic consequences of the Covid-19 pandemic are as yet unknown and such uncertainty means that a larger viability buffer is necessary. If the Benchmark Land Value (BLV) is lower than the market value at which land will trade, then the delivery of housing targets will not be met. Without a robust approach to viability assessment land will be withheld from the market and housing delivery will be threatened, leading to an unsound GNSP. Viability assessment is an

iterative process, in low / middle value areas “trade-offs” between affordable housing provision, CIL, S106 contributions and compliance with policy requirements may be necessary.

Housing Size, Types and Tenure

Question H2 : What should our role be in influencing the mix of housing size, types and tenure in new development schemes?

As set out in 2019 NPPF, the housing needs for different groups should be assessed to justify any policies on the size, type and tenure of housing including a need for affordable housing (paras 61 & 62). All policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). All households should have access to different types of dwellings to meet their housing needs. Market signals are important in determining the size and type of homes needed. The policy approach of the GNSP should be flexible and not overly prescriptive. The GNSP should focus on ensuring that there are appropriate sites allocated to meet the needs of specifically identified groups of households such as self & custom builders and the elderly without seeking a specific housing mix on individual sites. The GNSP should ensure that suitable sites are available for a wide range of developments across a wide choice of appropriate locations.

Also see HBF answer to Question H3 below.

Meeting the Needs of Different Groups

Question H3 : How should we address the needs of people with particular housing needs for example, the elderly, disabled and students?

If the Councils wish to adopt optional standards for accessible & adaptable dwellings, then this should only be done in accordance with the 2019 NPPF (para 127f & Footnote 46) and the latest NPPG. Footnote 46 states “*that planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing where this would address an identified need for such properties*”. As set out in the 2019 NPPF, all policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). The NPPG sets out the evidence necessary to justify a policy requirement for optional standards. The Councils should apply the criteria set out in the NPPG (ID 56-005-20150327 to 56-011-20150327) to ensure that an appropriate evidence base is available to support any proposed policy requirements.

Many older households already live in Greater Nottingham. Many will not move from their current home but will make adaptations as required to meet their needs, some will choose to move to another dwelling in the existing stock rather than a new build property and some will want to live in specialist older person

housing. The existing housing stock (circa 344,700 dwellings) is considerably larger than the new build sector so adapting the existing stock is likely to form part of the solution. It is important to note that not all health problems affect a household's housing needs therefore not all health problems require adaptations to homes.

If the Councils wish to apply the optional Nationally Described Space Standard (NDSS) to new build dwellings, then again this should only be done in accordance with the 2019 NPPF (para 127f & Footnote 46). Footnote 46 states that "*policies may also make use of the NDSS where the need for an internal space standard can be justified*". As set out in the 2019 NPPF, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). The NPPG sets out that "*where a need for internal space standards is identified, the authority should provide justification for requiring internal space policies. Authorities should take account of the following areas need, viability and timing*" (ID: 56-020-20150327).

Also see HBF answer to Question H2 above.

Achieving Well Designed Places

Question D1 : Should we promote the use of consistent design principles or standards across the Plan area? If so, what design tools should be used?

The GNSP's policy approach to achieving well designed places should accord with the 2019 NPPF, the latest NPPG and the National Design Guide. Any local guidance should be specific to the locality rather than repetitive of national policy or guidance. The HBF is supportive of the use of best practice guidance such as Building for a Healthy Life however the use of such guidance should remain voluntary rather than becoming a mandatory policy requirement, which developers are obliged to use as a pre-condition for the Councils support.

Also see HBF answer to Question H3 above concerning any policy requirements for optional technical standards.

Question IN1 : Infrastructure to Support Growth - Are there any barriers to future housing or economic development in terms of necessary infrastructure provision, and if so what are they?

An Infrastructure Delivery Plan (IDP) should be prepared to support the GNSP, which should identify the infrastructure requirements to deliver the growth strategy and sources of anticipated funding including developer contributions. A whole Plan viability assessment should be undertaken to ensure that policies setting out Section 106 and / or Community Infrastructure Levy contributions expected from developments do not undermine delivery of the GNSP.

Also see HBF answer to Question H1 above concerning viability assessment.

Conclusion

It is hoped that these responses will assist the Councils in informing the next stages of the GNSP. If any further information or assistance is required please contact the undersigned.

Yours faithfully
for and on behalf of **HBF**



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