

EXAMINATION OF NOTTINGHAM LOCAL PLAN PART 2
MATTER 5 – DEVELOPMENT MANAGEMENT POLICIES : SUSTAINABLE GROWTH

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 11th March 2016. This representation answers specific questions as set out in the Inspector's Matters, Issues & Questions document.

Issue 1 – Climate Change

Policy CC1: Sustainable Design and Construction

Q1. Is the requirement of Section 3 of Policy CC1 in relation to water consumption justified in terms of need and has the impact on viability been adequately considered?

The requirement in Policy CC1 Bullet Point (3) for the higher optional water efficiency standard of 110 litres per person per day is not justified. The WMS dated 25th March 2015 confirms that *“the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG”*. If the Council wishes to adopt the higher optional standard for water efficiency the Council should only do so by applying the criteria set out in the NPPG. The Housing Standards Review was explicit that reduced water consumption was solely applicable to water stressed areas. The NPPG (ID 56-013 to 56-017) refers to *“helping to use natural resources prudently ... to adopt proactive strategies to ... take full account of water supply and demand considerations ... whether a tighter water efficiency requirement for new homes is justified to help manage demand”*. The Council's evidence set out in the Greater Nottingham & Ashfield Water Cycle Strategy 2010 (LAPP-ENVIRO-07) and Greater Nottingham Scoping Water Cycle Study 2009 (LAPP-ENVIRO-06) to justify Bullet Point (3) are both somewhat dated. The evidence in LAPP-ENVIRO-07 is relatively inconclusive recommending that further work is undertaken in a Detailed Water Study therefore the Council is imposing the higher optional water efficiency standard without supporting evidence to justify doing so. Although the evidence states that *“In the case of the Greater Nottingham and Ashfield study area, Severn Trent Water plans a programme of resource development and demand management that will ensure sufficient supplies to 2035. To support the management of water resources, emphasis should be placed on ensuring new development achieves a high level of water efficiency”* (para 8.6.7) this is not categorising Nottingham City as a water stress area. As all new dwellings achieve a mandatory high level of water

efficiency of 120 litres per day per person under Building Regulations which is higher than that achieved by much of the existing housing stock this is supporting the emphasis on water efficiency in new development set out in the Council's evidence. It is recommended that Bullet Point (3) is deleted. If Bullet Point (3) is retained the wording should be modified to support rather than require any optional higher water efficiency standard. The following wording is suggested :-

Policy CC1: Sustainable Design and Construction

Sustainable Design

3. New dwellings ~~will be required to~~ that meet the optional higher National Technical Standard for water consumption of 110 litres per person per day will be supported.

Q2. Is the reference in Section 4 of Policy CC1 to supporting energy generation and use over and above the National Housing Standards consistent with national policy? Is the policy wording sufficiently clear and effective for development management purposes having regard to the Framework?

As set out in the HBF representations Policy CC1 Bullet Point (4) is not clearly worded for effective development management purposes. The Council's supporting text correctly sets out that "*In March 2015, by way of a Ministerial Statement, the Government confirmed that councils should no longer set their own local energy standards for new residential development. Instead, mandatory energy performance standards for all new homes are now incorporated into the Building Regulations. The Government has also confirmed that proposals for zero carbon homes and allowable solutions will not be pursued at present*" (para 3.6) and "*Therefore, Policy CC1 does not include requirements relating to energy performance in new dwellings but seeks to secure sustainable design features to maximise resilience and adaptation to climate change*" (para 3.7). New development should be planned to help reduce greenhouse gas emissions by its location, orientation and design. The starting point for the reduction of energy consumption should be an energy hierarchy of energy reduction, energy efficiency, renewable energy and then finally low carbon energy. From the start emphasis should be on a 'fabric first' approach which by improving fabric specification increases thermal efficiency and so reduces heating and electricity usage. It is recommended that Bullet Point (4) is deleted. If Bullet Point (4) is retained the wording should be modified. The following wording is suggested :-

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4. Innovative sustainable design solutions for energy efficiency and low carbon energy generation and use ~~over and above the National Housing Standards~~ Building Regulations will be supported.