

**Matter 5: Principles of Sustainable Development, Design and Placemaking (inc. Transport and Accessibility STR5; Services, Facilities and Infrastructure STR6)**

Key Issue:

Do the policies and proposals on this matter fully achieve the sustainable development and placemaking objectives of the LDP consistent with national policy? Are they based on robust and credible evidence?

a) Does the LDP place sufficient emphasis on the benefits to sustainability of the use of brownfield land for development? How does the LDP encourage this?

**HBF supports the LDP regarding its position on this issue and notes that the largest strategic housing site is a brown field site. The plan further explains why there is a limit of developable brown field sites in the Authority, thus justifying the release of green field sites.**

b) Is the wording of Policy STR4 unduly onerous; should it be qualified by 'where appropriate'? Will it have a serious, detrimental effect on the viability of development proposals?

**HBF agrees with the Inspector that the wording of this policy should be more flexible and instead include the wording 'where appropriate'. It will not in reality be possible for all development to meet the policy requirements fully, therefore this policy could as currently worded restrict acceptable development coming forward.**

**The issue of policy wording is more important following the publication of Town and Country Planning (Major Residential Development) (Notification) (Wales) Direction 2020. As LPA's are now required on all schemes of 10 or more homes to refer a decision to the Minister where it is not in accordance with one or more provisions of the development plan in force**

e) How will infrastructure for new development be provided and through what mechanisms? How will contributions be calculated? What is the position with regard to CIL?

**HBF notes that the two main SPG's which would be used when considering developer contributions [Affordable Housing, Developer Contributions to Education] were both adopted in 2017 and will therefore need to be updated. It is also common for the LPA to have a more general SPG covering all the other areas where S106 contributions may be required and how these should be calculated. This wider contribution SPG is helpful to developers in understanding the viability of a site and aids site delivery.**