

**LOCAL PLAN REVIEW DEVELOPMENT STRATEGY OPTIONS AND POLICY OPTIONS -  
JANUARY TO MARCH 2022**

**SUMMARY OF RESPONSES TO Q21**

**Question 21 – Do you agree with the preferred policy approach for Lifecycle Carbon Assessment? If not, why not?**

A summary of the other comments received are set out below:

Comment	NWL Officer Response
Energy and water efficiency go hand in hand and can potentially promote multiple benefits if delivered.	These comments are noted.
It is recognised that real estate is a significant contributor to carbon emissions through the construction and operation of buildings. In setting policy on sustainable design, given the rapidly changing technologies and approaches, it is important to avoid policy wording that is too inflexible or could conflict with government legislation and building regulations.	These comments are noted.
The sentiment of the preferred approach is understood. However, if it is the intention that Lifecycle Carbon Assessments (LCAs) should include highways and transport infrastructure associated with new developments, then this would become very wide ranging and complex; it is not clear how and where this would align with the planning application process nor current 'traditional' highway adoption processes; and would likely require additional training for Local Highway Authority officers.	These comments are noted. Whole Life-Cycle Carbon (WLC) emissions are the carbon emissions resulting from the materials, construction and the use of a building over its entire life, including its demolition and disposal. It is not intended that highways and/or transport infrastructure be included.
The need to address climate change is being addressed on a co-ordinated and industry wide basis through Building Regulations changes, agreed targets and joint multi-agency working relationships.	Refer to paragraph 7.23-7.30 of the main report.  Policies will be tested as part of Local Plan Viability Assessment.
The inclusion of LCA in policy is not supported. The supporting evidence base (Renewable and Low Carbon Energy AECOM Study), states that such an assessment would incur significant design team (applicant) costs. It is questioned how much value will be derived from the assessments. Meeting Building Regulations will be sufficient to demonstrate that energy/water efficiency, overheating and carbon reductions have been achieved. No evidence has been provided to suggest this has been viability tested and therefore it is unclear whether it is deliverable.	Refer to paragraph 7.23-7.30 of the main report.  Policies will be tested as part of Local Plan Viability Assessment.

<p>LCAs are emerging as part of the London Plan but are not widely sought elsewhere. Whilst it is an important topic for NWL, it is suggested that all developments as a minimum are expected to complete a carbon lifecycle checklist, but formal assessments should remain discretionary at this early stage in their development. As part of the 5 year local plan review cycle, this could be an area of change when there is a wider range of businesses offering to complete LCAs and a greater knowledge within the LPA to interpret them.</p>	<p>Refer to paragraph 7.23-7.30 of the main report.</p>
<p>The policy needs to recognise that new methods of assessing carbon may come forward in the future as this becomes more mainstream.</p>	<p>Refer to paragraph 7.23-7.30 of the main report.</p>
<p>Any proposed Policy should ensure that it is not too restrictive and does not prevent important development from being brought forward. With current construction methods and materials, it could be extremely difficult to offset this embodied carbon in, for example, a housing scheme. Consideration must be given in any policy wording to the above constraints.</p>	<p>These comments are noted.</p>
<p>How would such an approach be regulated for example where is the detail of the standard set-out, how might this be updated going forward, how will the Council resource assessments of the LCA and will this be factored into viability of appraisal of planning policies? Option 3 is supported. Question whether there are the resources to police/monitor the policy?</p>	<p>Refer to paragraph 7.23-7.30 of the main report.</p> <p>Policies will be tested as part of Local Plan Viability Assessment.</p>
<p>Support Option 3, however, It is important that any future policy wording allows flexibility to acknowledge that, at outline design stage, there will only be limited material data and information available to draw upon which will significantly reduce the effectiveness of the LCA exercise. It would be more efficient to allow the use of benchmark data for an outline application with an LCA required for detailed planning submissions.</p>	<p>These comments are noted.</p>
<p>The submission of an LCA is not a requirement that is set out in the NPPF and is therefore a complicated additional burden that goes beyond the requirements of national policy. Paragraph 154 of the NPPF states that any local requirements for the sustainability of buildings should reflect the Government's policy for national technical</p>	<p>Refer to paragraph 7.23-7.30 of the main report.</p>

<p>standards. More reasonable for applicants to submit an overarching Sustainability Statement that sets out the proposed scheme's compliance with relevant policy requirements and gives an overview of the scheme's sustainability credentials.</p>	
<p>The requirements should apply to ALL developments. There seems little point in having a policy that can be evaded in smaller developments resulting in non-compliant properties being built.</p>	<p>These comments are noted.</p> <p>The NPPF recognises the contribution small and medium sized builders can make to meeting the housing requirement of an area. However, small and medium sized builders do not benefit from the same level of resources as volume housebuilders therefore, requirements need to be balanced against resource levels.</p>
<p>Preference is for Option 2 but the impact on smaller developments is appreciated, and this approach is considered acceptable. Re point 9.35 - the language reads that smaller developments need to demonstrate Lifecycle Carbon has been "considered" - it is the enforcement of the intention of this policy that will be key.</p>	<p>These comments are noted.</p>
<p>Support the proposal for more specific requirements to address 'Embodied Carbon' through life cycle carbon assessments. The proposals in Option 3, which we support, represent a useful step forward from the existing rather general Local Plan policy that "new development should have regard to sustainable design and construction methods".</p>	<p>These comments are noted.</p>
<p>The policy approach is agreed and the opportunity the review gives to how repurposing existing built fabric (designated or non-designated heritage assets) can assist with considerations about embodied carbon.</p>	<p>These comments are noted.</p>
<p>Option 3 would be the most pragmatic and viable option.</p>	<p>These comments are noted.</p>
<p>The introduction of a policy for addressing carbon emissions is agreed. The policy should retain the clause regarding technical feasibility and economic viability to ensure each scheme and any constraints can be assessed individually. The preparation of a Supplementary Planning Document would assist applicants in preparing developments and understanding the Council's requirements. Any requirements should also be tested to ensure that viability and deliverability is not adversely impacted</p>	<p>These comments are noted.</p> <p>The Levelling Up and Regeneration Bill: reforms to national planning policy consultation document states that authorities will no longer be able to prepare supplementary planning documents. It is therefore suggested that the reference to Supplementary Planning Document be deleted.</p>

Option 2 is preferred, everything needs considering.	These comments are noted.
Policy is not supported. Too much development is allowed on green field sites. If the removal of every green item is allowed, it cannot be carbon neutral.	These comments are noted.
This headlong rush into green issues has been generated by an 'us too' follow my leader attitude that supports industries and experts whose job depends on compliance. Something of benefit would be to volunteer to test Rolls Royce and JCB's technologies.	These comments are noted.
If using Option 3 then officers would need adequate training to check and ensure the policy is followed and not just a tick box.	These comments are noted.
Point 5 of the proposed combined policy looks to replace proposed heating systems with heat pumps or similar in the future. The policy should insist that developments to be started some years ahead are built with heat pumps or similar technology.	These comments are noted.