

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

SUMMARY OF RESPONSES TO Q23

Question 23 - Do you agree with the preferred policy approach for the climate change assessment of development? If not, why not?

A summary of the comments received are set out below:

Comment	NWL Officer Response
There should be a strategic policy at the very front of the plan to address Climate Change and meet net-zero targets and both the design and location of development should be judged against that policy.	There is an agreed Local Plan objective that specifically refers to climate change.
Option 2 should be adopted; all developments should demonstrate that they are addressing climate change and meeting BREEAM/HQM requirements given the net zero by 2050 commitment for the district.	
Option 2 is supported – all developments need to prove they have a net positive impact on climate including biodiversity.	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.
Less consideration appears to have been given to climate change adaptation as required by the Planning & Compulsory Purchase Act (2004) and NPPF.	The consultation proposes policies that aim to mitigate the impacts of climate change. Policies relating to climate change adaptation including flood risk and sustainable drainage systems have not yet been reviewed.
Climate Change policies should also take into account flood risk, water resources, water quality and nature-based solutions.	These comments are noted.
In setting planning 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.
Support the policy approach in relation to overheating. Without consideration of this issue at an early stage in the planning process there is the risk that future maladaptation of new build schemes, to reduce any increase in heating that may occur, which could affect the setting of	These comments are noted. A new Building Regulation has been introduced in relation to overheating.

<p>heritage assets in a way that was not taken into account at application stage.</p>	
<p>Local planning policies should not accelerate beyond requirements of building regulations. 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. Compliance with Building Regulations will be sufficient to demonstrate that energy/water efficiency, overheating and carbon reductions have been achieved.</p>	<p>Since the preparation of the consultation document changes to the Building Regulations have come into force in relation to energy efficiency, ventilation, and overheating. As these matters are dealt with via Building Regulation requirements and potential subsequent requirements of the Future Homes Standard and there is no need for the requirements to be repeated in planning policy. The policy wording will be revised to reflect this.</p> <p>Water efficiency is subject to a separate proposed policy.</p>
<p>No viability evidence has been provided as to the inclusion of a policy that requires applicants to undertake a recognised industry assessment. Therefore, it is unclear whether it is deliverable.</p>	<p>The policy will be subject to viability testing through the whole Local Plan Viability Assessment.</p>
<p>The submission of an HQM assessment is not a requirement set out in the NPPF and is a complicated additional burden that goes beyond the requirements of national policy. 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>It is suggested that reference to HQM be removed from the proposed policy. It is suggested that development proposals be required to demonstrate how they are addressing climate change and that the requirements of the policy have been met. The policy wording will be revised to reflect this.</p>
<p>The Government, (in paragraph 9.50 of the Reg 18 consultation document), establish the mandatory standards for energy use and CO2 emissions. It is not clear whether any detailed assessment has been given to the viability impact of going beyond these nationally set requirements? Furthermore, the use of additional BREEAM or HQM standards and assessments seems to add another layer of unnecessary bureaucracy to the planning process which will only serve to delay development which complies with the latest Part L Building Regulations.</p>	<p>Since the preparation of the consultation document changes to the Building Regulations have come into force in relation to energy efficiency, ventilation and overheating. As these matters are dealt with via Building Regulation requirements and potential subsequent requirements of the Future Homes Standard and there is no need for the requirements to be repeated in planning policy. The policy wording will be revised to reflect this.</p> <p>It is suggested that reference to HQM be removed from the proposed policy. It is suggested that development proposals be required to demonstrate how they are addressing climate change and that the requirements of the policy have been met. The policy wording will be revised to reflect this.</p>

	The policy will be subject to viability testing through the Local Plan Viability Assessment.
The introduction of a policy for addressing carbon emissions is supported and should retain the clause regarding technical feasibility and economic viability to ensure each scheme and any constraints can be assessed individually. A Supplementary Planning Document would assist applicants in preparing developments and understanding the Council's requirements.	These comments are noted. 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.
Approach is supported provided there are thorough and comprehensive assessments undertaken via site visits and not desk based assessments that do not consider the locale's characteristics.	These comments are noted.
Clarification is required on what 'major developments' are e.g., 30+ houses etc.	Paragraph 8.21 of the consultation document sets out the definition of major developments as: those of 1ha or more or 30 or more dwellings and not developed by a small to medium sized builder, defined as those having a turnover of up to £45m.
The requirements should apply to ALL developments. There seems little point in having a policy that can be evaded by smaller developments resulting in non-compliant properties being built. It is just as important that smaller developments are built to a high standard and contribute to carbon neutral targets.	These comments are noted.
The proposed requirement for BREEAM to be applied on non-residential developments is supported, particularly the incorporation of the water efficiency policies.	These comments are noted.
Option 3 would be most pragmatic and viable.	These comments are noted.
Supports the preferred policy approach for the climate change assessment of development and seems appropriate.	These comments are noted.
Supports the aim of improving developments to better deliver Climate Change goals with Option 3 as the preferred one. However, that needs to be seen in the context of the location of development.	These comments are noted.
Large scale new developments should be held to high standards of construction methods and design and therefore the proposed policy approach for climate	These comments are noted.

change assessments of developments is agreed.	
Proposed policy is supported but it is not sufficient for real change.	These comments are noted.
Building more housing will affect climate change.	These comments are noted.
Policy is not supported, things are far too serious for any of your policies, recycling, including of land should be a major factor. The damage to the environment should be paramount.	These comments are noted.
No objection to well insulated new homes and buildings, it is sensible and cost effective. Surely all it needs is adherence to the building regulations.	These comments are noted.
Option 3 is preferred provided that the implications for residents and consumers of energy efficiency measures which include possibly impractical and or very costly heating solutions are not rushed through. It makes sense to assess all developments, but realism will be needed as to the standards themselves.	These comments are noted.
Unsure whether a change is needed to policy to set-out specific targets under assessment criteria.	These comments are noted.
Option 3 is preferred - with the same provisos as in previous assessments. Where are the resources to manage this?	These comments are noted.
Policy is supported but notes that it is never applied to new planning applications.	These comments are noted.
Option 2 is preferred to Option 3 given the net zero by 2050 commitment for the district.	These comments are noted.