

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

**SUMMARY OF RESPONSES TO Q24**

**Question 24 - Do you agree with the proposed policy for reducing carbon emissions?  
If not, why not?**

A summary of the comments received are set out below:

| Comment  | NWL Officer Response  |
|--|---|
| Whilst it is noted that there is a separate policy relating to water efficiency it is highlighted that water efficiency and the implementation of water efficient design and technology often supports energy efficiency and would therefore help to reduce household carbon production, but also carbon production used for the water treatment for consumption and wastewater treatment process. | These comments are noted.   |
| Support the aim of improving developments to better deliver Climate Change goals and supports elements of the proposed policy in para. 9.55. As with Q23, the location of development is significant.  | These comments are noted.   |
| The Plan should limit the number of policies relating to climate change. There needs to be a strategic policy set out the start of the plan to address Climate Change and meet net-zero targets. This could include clear criteria on each matter for developments to be assessed against.   | There is an agreed Local Plan objective that specifically addresses climate change. The number of policies in the Local Plan relating to climate change will be limited.  |
| The aims of the policy are noted but the policy does not address reducing carbon emissions through different modes of travel and the location of developments. It needs additionally to include policies relating to Transport and Movement (category 2.1 in HQM guide). For purposes of clarity, this policy should re-named 'Sustainable Buildings and Reducing Carbon Emissions'.               | The development strategy will address the issue of the location of development. This policy is concerned with reducing carbon emissions associated with new buildings. Suggest the policy could be retitled "Reducing carbon emissions in new buildings".<br><br>The Transport Infrastructure and new development policy of the Local Plan has not yet been reviewed. |
| It should be made clear that the last paragraph does not negate or qualify the requirement for a 31% improvement in energy efficiency over the 2013 edition of the Building regulations but applies to any shortfall below 100% net zero.  | The Building Regulations requirement for energy efficiency is going to be relied upon and the policy wording will be amended to reflect this.   |
| Support in principle but wary of the government's apparent adoption of targets without any thought as to how to manage the transition and the financial impact of, for   | These comments are noted. We are aware of this issue and will continue to discuss with energy providers.  |

|   |   |
|---|---|
| <p>example, low carbon heating systems in older properties. There is no mention of the very substantial increase in the resilience required for power networks as electricity becomes critical to more and more aspects of everyday life.</p>   | <p>The lack of capacity in the network is a nationwide issue and the council could write to the Government regarding the issue.</p>   |
| <p>General support for the approach to reduce carbon emissions. Strong support for development plan carbon mitigation policies and projects which ensure climate resilience and environmental benefits at the heart of the delivery of new homes and the infrastructure that enables healthy, productive places. Supports increases in the uptake of nature-based solutions, including blue and green infrastructure, which provide multi-functional benefits. Suggest that the proposed hierarchy of measures in the policy should start with building design covering, for example, energy reduction, energy efficiency and renewable energy.</p> | <p>These comments are noted.</p> <p>The proposed policy in part 1) refers to the design of new buildings and then sets out the fabric first sequence (points a) to c)) which address energy reduction, energy efficiency and renewable energy.</p>                                      |
| <p>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.</p>  | <p>These comments are noted.</p>  |
| <p>The proposed policy wording for reducing carbon emissions is supported. Noted that the carbon offset fund is still under consideration at this time.</p>   | <p>These comments are noted.</p>  |
| <p>In setting planning policy, 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.</p>   | <p>These comments are noted.</p>  |
| <p>Supports the policy on carbon emissions with funding being provided as the last resort option. There should be reference within the policy to incorporating infrastructure/technology required to support the decarbonisation of transport, including electric vehicle charging points.</p>  | <p>These comments are noted.</p> <p>There has been a new Building Regulation (Part S) which requires the installation of charging points for electric vehicles. As this is covered by Building Regulation requirements there is no need for this to be repeated in planning policy.</p> |
| <p>The reduction of carbon is an element of a much larger model, the 'circular economy' of which there is no mention. Reference to carbon and material efficiency can be strengthened and expanded upon through reference to specific measures. There is not</p>  | <p>The circular economy extends beyond the jurisdiction of planning policy. The Local Plan can only address those matters which are within the scope of the planning system.</p>  |

|  |   |
|--|---|
| <p>enough mention of resource efficiency. There should be more emphasis on the wider role of green spaces and ecosystems.</p>  |   |
| <p>From a landowner perspective, it is far more effective to have mandatory energy requirements for buildings so that this forces higher standards. When voluntary it is too easy for these to be excluded for various reasons. By mentioning off-setting as an option, this can provide an easy way out for builders.</p>   | <p>These comments are noted. The new Building Regulations will require achieving the specified standards.</p>   |
| <p>The policy is supported. The intention is for the Airport to reach net-zero carbon emissions by 2038 at the latest through innovation, new technologies and investment from airports, airlines and aircraft manufacturers.</p>  | <p>These comments are noted.</p>  |
| <p>The Plan should include a clear and comprehensive policy to address climate change. The draft policy would benefit from some clarification. As written, it is unclear how the required reduction in regulated CO2 is to be applied, as it appears to relate to all new development yet be referable to the Dwelling Emission Rate. The approach to commercial and other non-residential development should be clarified. It is considered that compliance with Building Regulations will be sufficient to demonstrate that energy/water efficiency, overheating and carbon reductions have been achieved.</p> | <p>It is proposed that the Building Regulation requirements for energy efficiency and overheating are going to be relied upon and the policy wording will be amended to reflect this.</p> <p>Water efficiency is subject to a separate proposed policy.</p> |
| <p>It is important that local planning policies do not accelerate beyond requirements of building regulations, setting onerous requirements on development particularly without evidence to support that such requirements are deliverable will prevent the speedy delivery of housing in accordance with the aspirations of the NPPF.</p>   | <p>These comments are noted. It is proposed that the Building Regulation requirements for energy efficiency and overheating are going to be relied upon and the policy wording will be amended to reflect this.</p>   |
| <p>It is noted that the policy adopts a fabric first approach which is supported. Consideration will also need to be given to ensuring that development is in sustainable locations which minimise the need to travel or the distance to be travelled.</p>   | <p>These comments are noted.</p> <p>The Transport Infrastructure and new development policy of the Local Plan has not yet been reviewed. There are agreed Local Plan objectives that refer to sustainable development and sustainable transport.</p>        |
| <p>The proposed policy should include a Carbon Offsetting Fund as developments may not be able to deliver the required level of CO2 emissions reduction onsite. This</p>   | <p>These comments are noted. The policy refers to there being a carbon offset fund although no decisions about the requirements of the councils own potential</p>   |

|  |   |
|--|---|
| <p>fund should be tested to ensure the viability the set rates will have on developers and these assessments should be made clear to prove that it is deliverable.</p>   | <p>fund or the potential to use an alternative carbon offset fund have been finalised.</p> <p>Policies in the Local Plan will be subject to viability testing through the Local Plan Viability Assessment.</p>  |
| <p>There are many alternative carbon off-setting funds available, and the development plan should not tie developers into a single method of off-setting. The policy wording should seek carbon off-setting to be demonstrated and secured through appropriate planning obligations as a reasonable alternative to the Council's own fund for which no details are currently known.</p>  | <p>These comments are noted.</p> <p>The Council is considering the potential for a carbon offset fund. No decisions about the requirements of the councils own potential fund or the potential to use an alternative carbon offset fund have been finalised.</p>  |
| <p>Supportive of policy which requires a reduction of carbon emissions. This policy could be combined with part 5 of the renewable energy policy, or perhaps cross referenced. Part 3 of this policy could include an expectation of using timber in construction to lock away carbon and increase demand for timber construction products.</p>  | <p>These comments are noted. Part 3) already refers to reducing embodied carbon and maximising opportunities for reuse of materials.</p> <p>It is recommended that part 5 of the Renewable Energy policy be deleted.</p>  |
| <p>Concern regarding the requirement to use HQM on all major developments and this should be set out as an option, allowing other forms of assessment to also be used. Concern is also raised with regard to the use of onsite renewable energy generation or where not maximised, then a payment to the Council's own carbon off-setting fund. There are many alternative carbon off-setting funds available, and the development plan should not tie developers into a single method of off-setting. The policy wording should seek carbon off-setting to be demonstrated and secured through appropriate planning obligations as a reasonable alternative to the Council's own fund for which no details are currently known.</p> | <p>It is suggested that reference to HQM be removed from the proposed policy. The policy wording will be revised to reflect this.</p> <p>The Council is considering the potential for a carbon offset fund. No decisions about the requirements of the councils own potential fund or the potential to use an alternative carbon offset fund have been finalised.</p> |
| <p>The target goes beyond the proposed plan period and there is no evidence of testing of development viability for such targets or what the phased approach might be.</p>   | <p>Renewable energy targets have been pro-rated for the plan period. The targets need amending as the plan period now goes to 2040.</p>   |
| <p>The Plan viability assessment and viability assessment of strategic sites should include the cost of network upgrades to support technologies. Where a viability assessment is submitted to accompany a planning application, this should be based</p>  | <p>These comments are noted.</p> <p>Policies in the Local Plan will be subject to viability testing through the Local Plan Viability Assessment. Only the requirements coming from policies can be</p>  |

|  |  |
|--|--|
| <p>upon and refer back to the viability assessment that informed the plan, with evidence of what has changed since then. Until the Future Homes Standard and the Standard Assessment Procedure software is finalised (the Government is due to consult in 2023) the industry will be unable to confirm building specification and carbon reduction over Building Regulations 2013. Currently the Future Homes Standard is intended to become legislation in 2025. The proposed local plan policy should be flexible to allow developers to utilise the most appropriate technology available at that time. The Government’s approach “remains technology-neutral and designers will retain the flexibility they need to use the materials and technologies that suit the circumstances of a site and their business”. (MHCLG Summary Response to the FHS (2019 Consultation Changes to Part L and F)).</p>   | <p>tested. The need for a connection is a given for any development but it is not a policy requirement.</p> <p>It is proposed that the Building Regulation requirements for energy efficiency and overheating are going to be relied upon and the policy wording will be amended to reflect this.</p>  |
| <p>The sentiments of the proposed policy are supported. However, a number of detailed points require clarification.</p> <p>a) The draft Policy requires all development to achieve net zero carbon, however it’s not clear as to the definition and timescales associated.</p> <p>b) Non-domestic buildings are assessed under different regulations which set different targets for different building types, and this should be clarified within the proposed policy wording.</p> <p>c) Carbon offset fund – The Council should make clear what charge would be levied on any residual carbon emissions which cannot be offset through onsite initiatives. Developers may already be off setting their emissions through a recognised 3rd party certified scheme outside the district and policy should make allowances for this situation. The council should ensure that their fund meets the requirements of high-quality carbon offset projects to enable such offsets to be counted toward a net zero carbon target. Also, a number of other factors, in addition to renewable energy, can contribute to a reduction in carbon. Great weight should be given to the benefit of those developments which adopt a broad range of approaches to reduce their carbon output in the decision-making process.</p> | <p>The council made a climate change emergency declaration on 25 June 2019 which set out the council’s commitment to support the Government’s net zero target to 2050. It is suggested that be amended to clarify timescales and definitions.</p> <p>The Building Regulation requirements and subsequent requirements of the Future Homes Standard are considered to be the most appropriate energy efficiency targets for residential and non-residential developments. This will be reflected in revised policy wording.</p> <p>The Council is considering the potential for a carbon offset fund. No decisions about the requirements of the councils own potential fund or the potential to use an alternative carbon offset fund have been finalised.</p> |
| <p>Requirement 2 of the proposed policy should be re-worded so as to require</p>   | <p>These comments are noted.</p>   |

|  |  |
|--|--|
| <p>developments to “<i>achieve an energy efficiency in line with the latest standards set by the Government, whether that be Building Regulations or the Future Homes Standard (including any transitional arrangements).</i>” The suggestion that applicants should make a financial contribution towards the Council’s carbon offset fund in circumstances where on-site delivery is not economically viable appears counter intuitive.</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>The Council is considering the potential for a carbon offset fund. No decisions about the requirements have been finalised.</p>   |
| <p>The policy 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.</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>  |
| <p>The policy should only apply to major development proposals.</p>  | <p>These comments are noted.</p>   |
| <p>The policy should apply to all proposals.</p>   | <p>These comments are noted.</p>   |
| <p>Agree in principle with having a policy but have the following comments:</p> <p>Section 1 – the reduction methods should be put in an order but 1a to 1d are all equally important measures to take when planning a development – it does not make sense for example to consider solar panels only after smart systems and insulation – surely all of these measures should be considered alongside each other/as part of the same process rather than either/or approach?</p> <p>Section 1a - behavioural changes are part of the planning process as there is no way to “police” how people use the facilities installed.</p> <p>Could neighbourhood heat systems be considered for developments of more than 1 property? Conventional heating systems should not be permitted as there are plenty of sustainable options available and many have grant funding attached to them.</p> | <p>These comments are noted.</p> <p>The AECOM Study recommended that guidance should emphasise the importance of following the energy hierarchy. The policy follows the Energy Hierarchy and in doing so seeks to reduce energy use before seeking to meet the remaining demand by the cleanest means possible.</p> <p>Part 1) a) of the proposed policy makes reference to behavioural changes. This is not something that can be determined through the planning system therefore it is recommended that this is deleted. delete</p> <p>The requirement for requiring neighbourhood heat systems would need to be economically viable. There is not anything in the policy that would preclude this as an option for inclusion in a development.</p> |

|   |   |
|---|---|
| <p>New developments must not have a detrimental impact on existing neighbour renewable energy schemes – for example by blocking sunlight to existing solar panels, or blocking wind for turbines etc.</p> <p>Section 5 – this ought to be done now, on building, rather than being an option for the future.</p> <p>The requirement to use the Homes Quality Mark scheme should be applied to ALL developments, why allow any developments to avoid meeting the carbon reduction targets of the local plan?</p> <p>The use of renewables should be included in the Design and Access statement for planning applications.</p> | <p>Since the preparation of the consultation document a new Building Regulation relating to overheating has come into force. 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> <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>Broadly support the proposed policy for reducing carbon emissions. The draft policy wording appears to include flexibility to recognise the difficulties for smaller developments in addressing climate issues. The more stringent requirements are therefore levelled at the larger development where economies of scale make this more achievable.</p>   | <p>These comments are noted.</p>  |
| <p>The science is telling us that more needs to be done and sooner.</p>   | <p>These comments are noted.</p>  |
| <p>It appears you are only interested in short term gain for NWL and the policies proposed will only make it worse. Too little too late, stop building and you might have a chance. Development is too carbon positive. The damage to carbon stores is not taken into account.</p>  | <p>These comments are noted. The Council is required to meet the future housing and economic needs of the district, but in doing so has to balance this against a wide range of other considerations, including climate change and its potential impact.</p>  |
| <p>Policy supported. Industry must be accountable and must pay for its' own pollution.</p>  | <p>These comments are noted.</p>  |
| <p>Support but not feasible for those on lower incomes to buy into.</p>   | <p>These comments are noted.</p>  |
| <p>Surely this again already has a central government policy that only requires adherence. Anything that is linked to carbon trading should be considered a con and not tolerated.</p>  | <p>These comments are noted.</p>  |
| <p>When you have an airport on your doorstep with planes stinking up the atmosphere, I</p>  | <p>These comments are noted.</p>  |

|   |                           |
|---|---------------------------|
| think tinkering about with paperwork is ineffective.  |                           |
| Not possible to agree or disagree with the proposed policy, as the section on offsetting is too sketchy. It is unacceptable not to hold developers to account to minimise emissions on site, and resulting impacts e.g., traffic congestion. This is especially pertinent in the context of proposals for significant housing near a 24/7 airport, which multiplies emissions growth. | These comments are noted. |
| Welcomes plans to increase renewable energy. Regarding point 9.35 - the language reads that smaller developments need to demonstrate that Lifecycle Carbon has been "considered" - it is the enforcement of the intention of this policy that will be key. Any offsetting has to be considered the last resort.   | These comments are noted. |
| Welcome plans to increase renewable energy. New homes should have solar panels, heat pumps and great insulation. Need a change in mind set.   | These comments are noted. |