

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

**SUMMARY OF RESPONSES TO Q20**

**Question 20 – Do you agree with the preferred policy approach for energy efficiency?  
If not, why not?**

A summary of the comments received are set out below:

Comment	NWL Officer Response
Water efficient technology is often energy efficient by reducing the need to heat water. The promotion of water efficiency in line with Energy efficiency has the potential to support the delivery of the energy efficiency targets whilst also managing a vital resource in a more sustainable way.	These comments are noted. Water efficiency is addressed through its own proposed policy.
Support setting a higher energy efficiency target and support Option 3. Achieving higher levels of energy efficiency is crucial and should be a priority.	These comments are noted.
Option 3 is ambitious. Clear policies are needed to maximise the take up of insulation and ensure that new builds meet and exceed energy efficiency standards. There should be a greater emphasis on the incorporation of renewable energy generation. This needs to be achieved with clear and enforceable policies. Where opportunities exist, the plan should seek to encourage Passivhaus designs.	These comments are noted. Renewable energy generation is subject to a separate proposed policy.
Requiring contributions to a carbon offset fund will provide valuable resources for the council to be proactive in the retrofitting of net zero measures to the existing housing stock and to promote/support low carbon infrastructure.	These comments are noted.
What are the implications for residents and consumers of energy efficiency measures which include possibly impractical or very costly heating solutions being rushed through. Preference for Option 2 as a better balance.	These comments are noted.
The selection of Option 3 is welcome. Links to useful resources are suggested.	These comments are noted.
The Council does not need to set local energy efficiency standards due to the higher levels of energy efficiency standards for new homes set out in the 2021 Part L Interim Uplift and proposals for the 2025 Future Homes Standard. It is important to avoid policy wording that it too inflexible or could conflict with government legislation and building regulations. The policy is not	Refer to paragraph 7.15 - 7.18 of the main report.

<p>necessary, the Government's intention is clear to set standards for energy efficiency through Building Regulations. Appropriate evidence and viability testing would be needed if the Council wish to set targets higher than the intended Governmental targets to ensure targets do not negatively impact the delivery of housing. Building Regulations which align with the Future Homes Standard will be mandatory before this Local Plan is adopted.</p>	
<p>The direction of travel is supported in respect of carbon reduction. However, the success of achieving a low carbon future is by standardisation rather than individual council's specifying their own policy approach to energy efficiency.</p>	<p>To ensure a standardised target is in place the Building Regulation requirements and subsequent requirements of the Future Homes Standard are considered to be the most appropriate energy efficiency targets. This will be reflected in revised policy wording.</p>
<p>Viability and cost implications should be noted/addressed in any policy.</p>	<p>The policy will be subject to viability testing as part of the Local Plan Viability Assessment.</p>
<p>The proposed approach is supported – it is important to set targets which focus attention and will help to ensure that the council's ambitions are met.</p>	<p>These comments are noted.</p>
<p>The 31% improvement is specifically for new homes (Future Homes Standard) whilst the equivalent for Non-domestic buildings is the Future Buildings Standard and sets different targets for different building types. For Logistics (Use Class B8) this is circa 27% improvement on current 2013 Regulations. The draft policy should clarify the different targets for different types of development.</p>	<p>The Building Regulation requirements and subsequent requirements of the Future Homes Standard are considered to be the most appropriate energy efficiency targets. The Building Regulations cover dwellings as well as non-domestic buildings. This will be reflected in revised policy wording.</p>
<p>Policy wording should be avoided that is too inflexible or could conflict with Government legislation and building regulations. Flexible policy wording should be used that will ensure that the standards within the policy are not quickly outdated. For example, the proposed policy should require 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></p>	<p>Refer to paragraph 7.15 -7.18 of the main report.</p>
<p>Contributions to a carbon offset fund will provide valuable resources for the Council to be proactive in the retrofitting of net zero carbon measures to the existing housing</p>	<p>These comments are noted.</p>

stock and to promote/support low carbon infrastructure.	
There should be a greater emphasis on the incorporation of renewable energy generation and better standards of insulation etc. in new developments. This needs to be achieved with clear and enforceable policies.	<p>The provision of renewable energy generation is subject to a separate proposed policy.</p> <p>Part 1) b) of the proposed Reducing Carbon Emissions policy makes reference to <i>“energy efficiency through better insulation”</i>.</p>
The approach is supported and the quicker it is done the better for the health and wellbeing of the district’s residents. Energy efficient policies can positively affect health and wellbeing through reducing the negative impact of fuel poverty.	These comments are noted.
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.	These comments are noted.
Agree with the introduction of a policy for addressing carbon emissions. 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 and SPD would assist applicants in preparing and understanding the council’s requirements.	<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>
The policy should go further. Currently houses are being built with gas boilers and no solar power as standard.	These comments are noted.
Option 3 is the only approach. However solar energy generation needs to be built into housing and wind energy generation should not adversely impact biodiversity.	<p>These comments are noted.</p> <p>Solar and wind energy generation is covered in the proposed Renewable Energy Policy.</p>
Option 2 is supported – new builds should be required to achieve a 31% energy efficiency target as soon as possible. Energy efficiency is the top concern.	These comments are noted.
Not supported as the current policies are not complied with. New properties could be required to have solar panels – be the leader not the follower.	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.	These comments are noted.

Something of benefit would be to volunteer to test Rolls Royce and JCB's technologies.	
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