

Matter 2: Climate Change and Economic Prosperity

Issue: Are the proposed policies on climate change and economic prosperity justified, effective and consistent with national policy?

2.1 Is Policy CC1 justified, effective and consistent with national policy, including paragraph 16 of the Framework?

1. The HBF does not consider that CC1 is consistent with national policy in the NPPF which states that Plans should serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area and should contain policies that are clearly written and unambiguous so it is evident how a decision maker should react to development proposals¹. The HBF recommends that this policy is deleted.
2. The HBF generally supports sustainable development and considers that the homebuilding industry can help to address some of the climate change emergency challenges identified by the Council. However, the HBF considers that this policy is more of a statement of intent or vision rather than a policy and does not consider that it is necessary, and it repeats a lot of the elements of the policies that are detailed elsewhere in the Plan.
3. If the policy is to be retained the HBF considers that the policy should incorporate further flexibility and should include consideration of the impacts on viability of the delivery of this policy. The HBF recommends that in particular part 3 of the policy should be amended as follows:
 - All development **should** integrate the principles of sustainable design and construction into the design of proposals, **subject to the site's location, design, viability and other sustainability benefits arising from the proposed scheme.**

2.2 Is Policy SP4 justified, effective and consistent with national policy? Is the final bullet point of Policy SP4 appropriately drafted?

2.3 Would Policy SP4 allow for renewable energy projects to come forward in areas which form part of green and blue infrastructure networks?

2.4 Has sufficient consideration been given in Policy SP4 to the effect of major renewable energy projects on existing businesses locally?

2.5 Do the requirements of Policy SP9 duplicate other policies?

4. The Council have added a section to this policy that looks for new development to be resilient to Climate Change, with a developments ability to mitigate and adapt to climate change as a golden thread. The HBF considers that elements such as climate change resilience, low carbon and energy efficiency are already covered in CC1, therefore the

¹ NPPF 2021 paragraph 16.

level of duplication in relation to the Plan may be limited in CC1 were to be removed as a policy and instead included as vision statement or statement of intent.

5. The HBF generally supports the provision of low-carbon, energy efficient homes, however, the HBF considers that this should be done in line with Government plans to introduce this through national standards and building regulations. This helps to avoid unnecessary duplication or inconsistencies in policies.

2.6 Is new criterion V of Policy DM57 on resilience to climate change justified?

2.7 Do the requirements of criterion IX of Policy DM57 unnecessarily duplicate the requirements of policies on transport?