

Matter 12 – Greening Bassetlaw (Policies ST50 – ST53)

Issue 12 – Does the Plan set out a positively prepared strategy and policies relating to the historic and natural environment which are justified, effective and consistent with national policy?

12.1 a) Is Policy ST50 justified and consistent with national policy? Are the requirements of the Policy clear, and would they be effective? Are they supported by appropriate evidence of need and viability?

1. The HBF does not consider that Policy ST50 is justified, consistent with national policy or clear and effective. The original Part 1 of this policy looks for all proposals to seek to reduce carbon and energy impacts in their design and construction, and to incorporate measures that address climate change. The Council have proposed modifications to this which looks for all new development to be designed to improve resilience to the anticipated effects of climate change and incorporating where appropriate measures to address issues of mitigation and adaptation to climate change.
2. The HBF notes that today's new homes are already very energy efficient, with the majority having an A or B energy efficiency rating, compared to only 3% of existing properties. Nevertheless, the HBF recognise the need to move towards greater energy efficiency via a nationally consistent set of standards and timetable, which is universally understood and technically implementable. The HBF would strongly recommend that the Council do not seek to impose their own requirements which could conflict with these national standards and instead that the Council refer to Building Regulations, where amendments have been made to Part L, F, O and S, and where the Future Homes Standard will be introduced. The Future Homes Standard will ensure new homes have a smaller carbon footprint than any previous Government policy. In addition, this footprint will continue to reduce over time as the electricity grid decarbonises.
3. The HBF considers that the original point 1(d) in relation to compliance with relevant national building standards is ambiguous and unnecessary. If this policy is intended to refer to Building Regulations, then it is not necessary as this is a separate regulatory system. If it is other standards it needs to be clear what they are and when they apply, and this needs to be evidenced and justified. It is noted that the Council's proposed modification would see this element deleted and replaced with a requirement for non-residential development to meet BREEAM standards. The HBF considers that this is an appropriate modification.
4. The HBF considers that the original point 1(f) in relation to the provision of electric vehicle charging capability is unnecessary as Part S of the Building Regulations now provides the requirements for Electric Vehicle charging, including where exceptions may apply. The HBF notes that the Council propose to amend this requirement as part 3, however, the HBF considers that this has now been superseded by the introduction of Part S and is still not required.
5. The HBF considers that point 1(g) in relation to appropriate financial contributions to the Bassetlaw carbon offsetting fund is unnecessary and unjustified, particularly in light of the improvements to Building Regulations as set out above. The HBF notes that the Council propose to delete this point, the HBF would support that deletion.

Home Builders Federation (HBF) response to the
Bassetlaw Local Plan Examination
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6. Furthermore, the Council's Viability Assessment excludes any costs for 2021 Part L Interim Uplift, 2025 Future Homes Standard or financial contributions to carbon offsetting (see HBF detailed comments under Viability & Deliverability in the Regulation 19 response).
7. The HBF and its Members have serious concerns about the capacity of the existing electrical network in the UK. The supply from the power grid is already constrained in many areas across the country. Major network reinforcement will be required across the power network to facilitate the introduction of EVCPs and the move from gas to electric heating as proposed under the Future Homes Standard. These costs can be substantial and can drastically affect the viability of developments. If developers are funding the potential future reinforcement of the National Grid network at significant cost, this will have a significant impact on their businesses and potentially jeopardise future housing delivery.

b) Do the requirements of the Policy reflect guidance in paragraphs 153 and 154 of the National Planning Policy Framework, and are they in line with the Housing: Optional Technical Standards? What is the justification for setting the water efficiency requirement at 110ltrs per day? How is this supported by evidence?

8. The concerns of the HBF are set out in response to (a) above. The Council should ensure that they have appropriate evidence to support any requirements of the policy.

c) What are the reasons for the Council's proposed modifications to the Policy? Are they necessary for soundness? If so, are they clearly articulated and supported by clear evidence?

9. The concerns of the HBF are set out in response to (a) above.

12.2 a) Is Policy ST51 justified and consistent with national policy? Are the requirements of the Policy clear, and would they be effective?

b) How was the "area of best fit" arrived at? Is it supported by robust evidence?

c) In the case of wind turbines does the Policy reflect guidance in Planning Practice Guidance and the Written Ministerial Statement of 18th June 2015?

d) Are there any omissions from the Policy? Is it appropriately flexible?

e) What are the reasons for the Council's proposed modifications to the Policy? Are they necessary for soundness? If so, are they clearly articulated and supported by clear evidence?

12.3 a) Are Policies ST52 and ST53 justified and consistent with national policy? Are the requirements of the Policies clear, and would they be effective?

b) Are the Policies supported by appropriate evidence? In the case of ST53 is the Bassetlaw Water Cycle Study 2010 sufficiently up-to-date? How was the River Ryton Flood Management Impact Zone defined?

c) Are there any omissions from the Policies? Are they appropriately flexible? What are the reasons for the Council's proposed modifications to Policy ST53? Are they necessary for soundness? If so, are they clearly articulated and supported by clear evidence?