

Home Builders Federation

Matter 9

NORTH NORFOLK LOCAL PLAN EXAMINATION

Matter 9: Delivering Climate Resilient Sustainable Growth (CC policies)

Issue: Whether the policies for delivering climate resilient sustainable growth are positively prepared, justified, effective and consistent with national policy.

Questions:

9.1 Are the CC policies positively prepared, justified, effective and consistent with national policy? Are any main modifications necessary, and if so, what should these be?

The HBF are concerned that CC3 and CC8 have been superseded by building regulations therefore parts of these policies are no longer required. These concerns are set out below.

9.2 Does Policy CC2 provide appropriate guidance for the consideration of Renewable & Low Carbon Energy projects in the district? Are areas classified as moderate-high sensitivity in the Landscape Sensitivity Assessment SPD suitable for development in principle as proposed, and is the assessment sufficiently detailed to determine this? Should moderate-high sensitivity or less be reflected in Figure 5, which appears to be solely based on AONB & Broads designations? Are the other criteria in the policy justified and would they be effective? Has potential windfarm development at the district's airfields been sufficiently assessed to justify the less restrictive policy?

No comment.



9.3 How do the energy efficiency standards set out in section 1 of Policy CC3 relate to current and potential future building regulations? Does it need updating? Are any differences from building regulations standards justified? What does 'zero carbon ready' by 2035 mean in practice? What are the implications for the cost of development?

Part L of the 2021 Building Regulations that came into force in June 2022 will deliver a circa 30% reduction in CO₂ on the 2013 Building Regulations. As such it is unnecessary for the council to include this requirement in its local plan as the policy has been superseded by building regulations.

The Government is proposing that from 2025 new homes will have to meet the proposed Future Homes Standard. This will mean that homes will be prevented from using gas boilers and appliances meaning that they will become zero carbon as the national grid decarbonises. As set out in our statements to matter 4 the Future Homes Hub has undertaken some work to support and inform the implementation of the Future Homes Standard and have published evidence which indicates that for a three bed roomed end of terrace house the Future Homes Standard would add a 5% increase to per unit build cost compared to the 2021 Building Regulations.

9.4 Is the requirement in section 2 of Policy CC3 for all proposals to be accompanied by a compliance statement justified? Does this include minor development, or should there be a threshold?

Compliance statements must be proportionate to the scale of development. We would also suggest that it is not necessary to require development to address part b given that this will now be addressed through the building regulations.

9.5 Is the requirement in section 3 of Policy CC3 for non-residential development over 250 sq m floorspace to achieve BREEAM 'very good' standard justified? What are the implications for the cost of development?

No comment

9.6 Is the requirement in Policy CC4 for compliance with any future local water efficiency standard justified when these are not currently known?

No comment

9.7 Do Policies CC5 and CC6 provide appropriate guidance for the management of change and relocation of existing uses within the Coastal Change Management Area (CCMA)? Do they provide sufficient flexibility for tourist accommodation businesses operating within the CCMA? How reliable is the CCMA designation, what assumptions are made in drawing it up and when might it be reviewed? Is the vulnerable within 50 years period justified in relation to potential blight and investment decisions? Should it be more flexible or relate to the use concerned? Is the 'no net detrimental impact' test justified when the development being replaced remains temporarily?

No comment

9.8 Does Policy CC8 provide appropriate guidance for the provision of electric vehicle charging points in new development? Are the proposed standards justified, how do they relate to the building regulations and what are the implications for the cost of development? Is the text in 3.8.3 and 3.8.7 justified in requiring compliance with any future County Council electric vehicle parking standards when these are not currently known?

Standard for electric vehicle charging are now set out in building regulations being through the update part S of the Building Regulations. These came into force in June 2022. This approach provides the necessary consistency across the country as to what is required both in terms of the number of charging points but also the technical standard as to the type of charger to be used. As such the Council should delete the requirement for electric vehicle charging points set out in part 2 of this policy or state that residential development will be expected to meet the requirements set out in Part S.

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