

Home Builders Federation

Matter 10

DOVER LOCAL PLAN EXAMINATION

Matter 10 – Climate Change

Issue 1 – Climate Change and Development Requirements – Policies CC1, CC2, CC3, CC4, CC5, CC6, CC7 and CC8

Q1 What is the justification for Policy CC1? In the event that changes to the Building Regulations occur in 2025, what is the requirement for a policy in the Local Plan?

The policy is seeking to second guess what may occur with regard to the Future Homes Standard and whether this will be implemented through Building Regulations or through local plans as, potentially, an optional technical standard. It is our expectation that the Future Homes Standard will be delivered through Building Regulations and the HBF would consider this to be the most effective means in ensuring improvements in energy efficiency in new homes across the country. However, if the policy were to be introduced as an optional technical standard, then it would, as is currently the case, require the Council to provide evidence to support its adoption. The Council cannot pre-empt this situation by including a policy in this local plan adopting a requirement from some point in the future.

Given that it would appear the Government's intentions are for improvements in energy efficiency to be delivered through building regulations the HBF considers it unnecessary for this policy to reference energy efficiency improvements in relation to residential development. If the Future Homes Standard is introduced through the planning system in 2025 then it will be for the Council to consider its position at that time and whether a partial review of the plan is required to include a relevant policy.



Q2 Is it sufficiently clear what is expected of applications for planning permission now, ahead of planned changes to the Building Regulations?

The policy is not clear as to what is expected of applicants ahead of the implementation of the Future Homes Standard or whether, for example, it will seek to require development to achieve reductions in carbon emissions through the consideration of parts a and b of CC1 or whether this will only apply in meeting the lower energy efficiency standards brought in from 2025 and only where these are implemented through the planning system. The policy lacks the necessary clarity to be effective and needs to be amended to ensure that both decision makers and applicants are clear as to what is required on a development.

Q3 Where energy reduction is concerned, is the Plan consistent with paragraph 154(b) of the Framework, which states that any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards?

The policy is not inconsistent with paragraph 154b in that it makes reference to the national standards the Government are proposing to introduce from 2025. However, as set out above to try and second guess how these standards will be implemented is unsound.

Q4 Have the full range of measures required by Policies CC1, CC2, CC4 and CC8 been tested, alongside other planning policy costs, to determine how they will impact upon the viability of development? Are the conclusions accurate and robust?

No. Whilst CC1 references the Future Homes Standard in policy CC1 and its implementation from 2025 it has not made any allowance for this within the Viability Update note. The only cost consideration that has been made is in relation to the improvements made to Building Regulations that were included in the 2021 update to the Building Regulations that came in to force in June 2022. The Future Homes Hub report Ready for Zero¹ provides examples as to the additional cost compared to current Building Regulations. For example, to build an end of terrace house to the Future Homes Standard will be around £5,600 per home more expensive than a current home. Whilst this is a

¹ Ready for Zero Task Group Report Evidence to inform the 2025 Future Homes Standard (Future Homes Hub, February 2023)

relatively small increase it is still important that the full costs of development to ensure development remains deliverable across the plan period.

Q5 Have any locations that would be 'suitable in principle' for medium or large-scale wind turbines been identified? If so, are these locations appropriate and justified by evidence? If not, why not?

No comment

Q6 What is the justification for the requirement set out in Policy CC4 for all new dwellings to be built to a higher water efficiency standard? Is this appropriate in all circumstances?

No comment.

Q7 What are the reasons for the suggested changes to Policies CC5, CC6 and CC7? Why are they necessary for soundness?

No comment

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