

CHARNWOOD LOCAL PLAN EXAMINATION
MATTER 3 – CLIMATE CHANGE AND THE NATURAL & BUILT
ENVIRONMENT

Inspector’s issues and questions in bold type.

This Hearing Statement is made for and on behalf of the HBF, which should be read in conjunction with our representations to the pre submission Local Plan consultation dated 23 August 2021. This representation answers specific questions as set out in the Inspector’s Matters, Issues & Questions document issued on 25 April 2022.

Issue 1 - Whether the policies relating to climate change and the natural and built environment, are positively prepared, justified, effective and consistent with national policy

Policy CC4 – Sustainable Construction

Q3.11 Is there evidence of a clear local need for the water efficiency standard set out in the criteria?

The NPPG sets out that “*it will be for a LPA to establish a clear need based on existing sources of evidence, consultations with the local water and sewerage company, the Environment Agency and catchment partnerships and consideration of the impact on viability and housing supply of such a requirement*” (ID:56-015-20150327). The Council has provided no justification for the Policy CC4 requirement for new development to meet the optional water efficiency standard of 110 litres per person per day. The Council has not demonstrated a clear local need.

Furthermore, the additional cost is excluded from the Council’s viability testing. The Charnwood Local Plan Policies Matrix in the Viability Study states that “*costs are considered to be within BCIS cost allowance, increases in costs associated are anticipated to be off-set by value increases (due to better quality design / specification) given that we have adopted conservative sales prices*”. The HBF disagree and consider that the cost of the optional water efficiency standard (even if only circa £10 per dwelling) should be included in viability testing so the cumulative impact of compliance with all policy requirements set out in the Local Plan is tested.

Policy CC6 - Electric Vehicle Charging Points (EVCPs)

Q3.14 Is the policy necessary given the changes to the Building Regulations scheduled to come into force on 1 June 2022?

Policy CC6 is unnecessary given the changes to Part S of the Building Regulations, which are effective from June 2022.

Policy EV6 - Conserving and Enhancing Biodiversity & Geodiversity

Q3.22 Is the figure of 10% biodiversity net gain (BNG) sufficiently justified?

The figure of 10% biodiversity net gain is justified because it aligns with the mandatory requirement of the 2021 Environment Act. However, the HBF note that the Council has not proposed a transitional period. To reduce risks from unexpected costs and delays to housing delivery, the 2021 Environment Act makes provision for a transition period of two years.

Q3.36 Overall, does the Plan set out a positively prepared strategy to address the causes of and mitigate the impact of climate change and to conserve and enhance the natural and built environment? Are any main modifications necessary for soundness?

The following Main Modifications are necessary for soundness :-

- the deletion of the optional water efficiency standard from Policy CC4 ;
- the deletion of the requirement for EVCPs in Policy CC6 ; and
- the introduction of a transitional period for the implementation of BNG requirements in Policy EV6.