CITY OF YORK
LOCAL PLAN EXAMINATION IN PUBLIC

STATEMENT OF CASE
PHASE 4 HEARINGS

PREPARED ON BEHALF
OF VARIOUS CLIENTS

Prepared By:
Kathryn Jukes BA (Hons) DipTP MRTPI
23 Victoria Avenue
Harrogate
HG1 5RD

Tel: 01423 525456
Mobile: 07908 666530
Email: k.jukes@directionsplanning.co.uk

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1.0 INTRODUCTION

1.1 Directions Planning Consultancy Ltd has been instructed to act on behalf of a number of clients concerning their land and property interests in regard to the City of York Local Plan. As such, we have made representations at the various Local Plan consultation stages since the start of the current process in 2012.

1.2 Our representations to the Regulation 19 consultation in February 2018 provides us with the opportunity to take part in the Examination into the Local Plan, and the initial stage of responding to the Inspector's latest Schedule of Matters, Issues and Questions for the Examination (EX/INS/42a).

1.3 This Statement now responds directly to various Matters to which our previous comments relate in advance of the fourth phase of hearings. Not all of the Matters and questions have been addressed to which our representations previously addressed. Instead, we have attempted to provide concise responses to only those questions where we wish to bring particular points of note to the attention of the Inspectors to supplement our previous representations to the Regulation 19 consultation and subsequent Proposed Modifications consultation.

MATTER 1 – GREEN BELT BOUNDARIES

1.2 Are the inner Green Belt boundaries (Topic Paper 1 Addendum Annex 3 – Sections 5-7) reasonably derived?

Given that we are now in the fourth phase of hearings and some of the policies have been the subject of proposed modifications and previous hearings, we believe it necessary to mention points that we have raised previously.

With this in mind, we would like to raise the following points again in respect of the matters we have previously addressed relating to the Council's Topic Paper 1 Addendum (EX/CYC/59, April 2021) which were covered in our response to the consultation on the document submitted in July 2021.

Under Section 5, Boundary 11-15 East of Woodland Place to the rear of Pollard Close is shown to be a finger of greenspace that forms the river bank on either side of the River Foss that separates New Earswick from Huntington. To the north of the 'finger' is an area of mature woodland that acts to visually enclose the greenspace from the open countryside beyond.

In terms of the five purposes of Green Belt, the narrow finger of land does not check the unrestricted sprawl of York because the land penetrates into the urban extent of the settlement. As such, it does not serve to contain development in any respect. With regard to preventing neighbouring towns merging, it has already been concluded that York is to be viewed as one settlement and the various neighbourhoods are not a group of separate 'towns' that should not be merged. To this end, Green Belt is not the correct means by which to maintain the separation between the two districts of New Earswick and Huntington.

In respect of safeguarding the countryside from encroachment, the land is visually contained and does not form part of the wider countryside that requires safeguarding. If the countryside surrounding York is to be protected against encroachment, then the boundary needs to be drawn around the outer edge of the urban area rather than any of the fingers of greenspace character of the historic city. The Council's own assessment makes clear how this site does not aid the understanding of the historical relationship of the city to its hinterland.

Finally, the land is part of a river corridor so is subject to flood risk. This means that its development potential is limited so it does not need to be designated Green Belt to assist urban regeneration.

Furthermore, the Council's assessment within EX/CYC/59d concludes *"the land within the proposed boundary is:*

- *Not identified in the Green Belt appraisal work as being of primary importance to the setting of the historic city [SD107];*
- *Included as amenity Green Space and Natural/ Semi Natural Open space [SD085].*
- *Entirely within Regional Green Corridor 3 (Foss Corridor) [SD080].*
- *Within a high flood risk zone to the eastern edge;*
- *Not included in any nature conservation designations.*

The open land within the proposed boundary is therefore not suitable for development in line with the Local Plan strategy."

If the land is not of primary importance to the setting of the historic city and simply open space that is subject to flood risk then it appears self-explanatory that the boundary should exclude the 'finger' and be drawn across the 'mouth' to create an east / west boundary as a continuation of the outer extent of the urban area. There is absolutely no need to include the 'finger' within the Green Belt when it does not form part of the open countryside beyond the urban edge of York and there are other policies that might otherwise prevent inappropriate development.

A similar situation also exists in respect of Section 5, Boundary 21-27 Land to the East of Huntington and North of Monks Cross where a sliver of undeveloped land is identified to be included within the Green Belt even though it does not form part of the wider open countryside that needs to be protected from encroachment. Sections 23 to 26 of the proposed boundary should be excluded and instead the boundary should be drawn so as to form a north / south boundary around the edge of York with a view to protecting the openness of the agricultural land to the east, especially as the 'finger' does not represent encroachment into the countryside and development would not lead to the sprawl of the urban area into countryside. In addition, the narrow corridor has not been found to be important to the setting of the historic city.

The proposed allocation of Land to the East of Huntington for a new settlement under allocation ST8 only serves to provide further reason as to why the narrow corridor of land is not part of the wider countryside that needs to be kept open. The new settlement allocation will visually sever the narrow corridor of undeveloped land from the wider countryside. The allocation will also result in creation of another tract of land between boundaries 22 and 27a where the narrowness of the track of undeveloped land does not contribute to the purposes of Green Belt policy and could instead be protected by other means if it were considered necessary to protect against development. For the Plan to be found sound, the boundary therefore needs to be amended to exclude the tract of land.

<u>PM31: Windy Ridge, Huntington</u>

The misapplication of the methodology and continued over-emphasis on 'shapers' is evident in respect of Proposed Modification PM31 which involves some of the land covered by the boundary assessment 21-27 relating to the Land to the East of Huntington. It seems the proposed modification simply looks to exclude built development from the Green Belt, but continues to reinforce the application of Green Belt policy to protect undeveloped land irrespective of whether or not it fulfils the purposes of Green Belt policy.

If the purposes of Green Belt, as defined by paragraph 134 of the NPPF are applied, then there is no reason for including the narrow 'finger' of undeveloped land within the Green Belt, especially as it is not preventing towns from merging and it does not assist in the safeguarding of countryside by preventing sprawl since it is located between two districts within the extent of the urban area of York. We simply see no reason why it needs to be kept permanently open given that it will never lead to sprawling of development beyond the outer edge of the wider inner boundary proposed.

PM76: Homestead Park

The inconsistency in the way undeveloped land has been treated within the assessment and the impact of changing the emphasis of the assessment is evident in the Council's reassessment of Homestead Park and the proposed modification to exclude the land from the Green Belt.

It is absolutely right that the park should not be designated Green Belt because the current use of Homestead Park can be protected by the greenspace policies within the Local Plan. Designating the site as Green Belt is unnecessary when it is subject to other policies that place equally effective constraints on development.

Homestead Park was first opened in 1904 by Benjamin Seebohm who made available the park for use by children attending York Elementary School. Since then, the park has developed with extensive formal gardens, a picnic area and a children's playground. Because of human intervention in its setting out, it is very much a space that forms part of the built environment and it is quite distinct from the character of countryside beyond.

Its contribution towards the City's open space provision is well documented within the Council's evidence base and it is subject to a separate designation protecting the current open space land use, as illustrated on the Policies Map. On this basis, further designations protecting the park from development are not required and serve no additional purpose.

Furthermore, the park does not contribute to the five purposes of Green Belt set out under paragraph 134 of the NPPF. The extent of the park has been defined for some 120 years and so the potential for it to spawl does not need to be checked. We therefore support the Proposed Modification.

MATTER 12 – GENERAL DEVELOPMENT MANAGEMENT

13.1 Is Policy SS1 a proper reflection of the Plan as a whole?

Policy SS1 includes five spatial principles intended to guide the location of development through the plan. The last bullet refers to phasing first previously developed land. In reading the plan, there is no proactive or phasing of development with intent. Instead, brownfield land has been allocated for both employment and residential development, but delivery relates to the ability of the developer to bring forward development. This strategy is therefore not based on proactive phasing but in reaction to the realities of bringing forward difficult sites, such as York Central.

We therefore consider it necessary for the bullet point to be rewritten in order for the plan to be effective and justified by ensuring it is factually correct. We would suggest the following words are a truer representation of the strategy "Where viable and deliverable, the re-use of previously developed land will be allocated for development phased first."

Given we are now in the fourth phase of hearings and some of the policies have now been the subject of proposed modifications and previous hearings, we believe it necessary to mention points that we have been raised previously in respect to policy SS1 which are covered in our response submitted to the consultation on the document in July 2021.

PM49: Policy SS1

The Proposed Modification explains how the intention is for the Plan period to run from 2017 to 2032/33 with sufficient land allocated for a further period up to 2038. We have made the point at earlier stages of the process that there should be only one plan period in respect of both policies and proposals. This is rather than the current approach where the Council is attempting to outline policies for the remaining 12-year period (from 2021) and then proposals for the remaining period of 17 years. The approach is simply unsound because it is not compliant with national policy and legislation.

Town and Country Planning (Local Planning) (England) Regulations 2012 sets out under Part 3, Regulation 5(1)(a)(i) how local development documents are any documents that contain statements regarding specified matters, including "(i) the development and use of land which the local planning authority wish to encourage during any specified period."

Paragraph: 064 Reference ID: 61-064-20190315 of the National Planning Policy Guidance is clear that strategic policies should be prepared over a minimum 15-year period and a local planning authority should be planning for the full plan period.

Within the NPPF (2012) there are various references to the preparation of strategic policies within Local Plans, and the time frame to which policies should apply. These include paragraph 157 which states: "Crucially, Local Plans should…be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer-term requirements, and be kept up to date;" and paragraph 47 which states local planning authorities should "identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15." The 2019 version of the NPPF is more explicit that the plan period should endure for at least 15 years. Paragraph 22 states: *"Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long term requirements and opportunities, such as those arising from major improvements in infrastructure."*

Note how the tense of the word 'period' in each instance is singular and not plural. On this basis, there is no legitimate reason for the Local Plan to include two different time periods, especially, as the NPPF sets out under paragraph 139 the means by which the permanence of the green belt is to be preserved, which is through the designation of safeguarded land.

We are extremely concerned that the Council simply intends to allocate sufficient land for a 17-year period that will then require Green Belt boundaries to be reviewed at the end. If this is the case then the boundaries will not be permanent because they will not endure beyond the end of the Plan period, as is required under paragraph 36 of the NPPF. Particularly, as the boundaries will endure for a period of less than 20 years, which is accepted as being the minimum period required for boundaries to be considered permanent.

These points have been consistently raised through the various stages of the process together with the reasons why the Plan is to be considered unsound as a result. We would therefore suggest that reference to two plan periods needs to be amended to refer to only one period and that land should be safeguarded for future development. The NPPF sets out how identifying safeguarded land is the correct means to ensure boundaries can endure beyond the end of the plan period, which is a point we have raised at every stage of the process to date.

PM50: Policy SS1
PM53: Policy SS1
PM54: Policy SS1

It appears the goal posts are being moved within the Proposed Modification. The word 'average' has been inserted into the requirement under PM50, PM53 and PM54 so the intention is now to deliver a 'minimum average annual net provision' to reach the overall housing requirement of 13,152. This is instead of delivering a 'minimum annual net provision' of 822 dwellings per annum. The implication is that there may be several years where the Council does not deliver any houses but then over-delivers in a number of other years, which then add up to the total requirement when taken as an average.

The implication, and our worry, is that if the Council over-delivers across a number of years and reaches the housing requirement of 13,152 in advance of the end of the Plan period then the supply tap might be turned off and applications for development refused because the overall housing requirement has been reached. If the word 'average' is eliminated then the Council would not prevent sites coming forward on the basis of past delivery rates in the event the annual target of 822 or the

total of 13,152 was exceeded. This is because the original way in which the requirement was presented referred to a minimum annual provision of 822 dwellings per year, where the expectation was that any oversupply would accumulate without implication to ensuring that at least 822 dwellings are delivered each year.

We are concerned that the approach is no longer compliant with national planning policy because the Government does not expect a local plan to only deliver the overall requirement by the end of the plan period. Instead, the expectation is that a supply is maintained that equates to tranches of five-year periods and also a minimum number of houses is delivered in order to significantly boost the housing supply. Clearly, the intention of the Plan is only to deliver what is necessary by averaging out the annual delivery rate, which we do not believe complies with paragraph 59 of the NPPF.

Furthermore, we can find no explanation for the sudden introduction of the word 'average' in any of the evidence documents. There is also no assessment of its implications or whether it represents a reasonable alternative to not including the intention to only deliver on average the overall requirement. This is despite the implications of what initially appears to be an innocuous change, but in reality, has the potential to hugely stifle a continuous supply of new homes that might significantly boost the housing supply in accordance with the requirements set out in the NPPF.

If the Plan is to be found sound then the word 'average' needs to be deleted. Alternatively, further work and consultation is required to set out the reasonable alternative options in respect to the level of housing delivery over the Plan period and whether the emphasis is on managing the annual delivery rate, the five-year land supply or the overall housing requirement.

MATTER 13 – CLIMATE CHANGE

14.1 Is the suite of Policies CC1 to CC3 (as proposed for modification) a sufficiently comprehensive response to this issue?

We welcome the Council's intention to introduce modifications to policies CC1 to CC3 as mentioned in their Statement relating to Matter 8: Climate Change as part of the Phase 2 Hearings (HS/P2/M8/CC/1).

However, there is no need for the local plan to duplicate other legislation, such as with building regulations. The Council's Statement mentions how building regulations changed in June 2022 in respect of electric vehicle chargers, ventilation and conservation of fuel. Given that building regulations will continue to be updated in order to drive forward the government's commitment to addressing climate change then there is no justification for planning polices to duplicate targets especially as such duplication will result in the local plan being less effective as the targets fall behind those required through building regulations.

We therefore believe it more appropriate, in order for the plan to be sound in its effectiveness, for policies to refer to the objective of addressing climate change and to reference the relevant legislation that determine targets. The local plan policies do not, however, need to refer to specific targets, as this is counter-productive since targets are continuously being updated.

It should be remembered that where a local plan is out of date then it triggers the presumption in favour of sustainable development, and so being more general will act to preserve the effectiveness of the Plan over the Plan period. This is in contrast to the current situation where the specific target-driven nature of policies will find the Plan to be out of date in the future and thereby no longer effective.

We explain our case further under the policies below.

14.2 Does the approach of Policy CC1 to renewable and low-carbon energy generation and storage appropriately reflect national policy?

Policy CC1 sets out how "New buildings must achieve a reasonable reduction in carbon emissions of at least 28% unless it can be demonstrated that this is not viable." The justification then explains that despite the Council not being able to set higher targets than building regulations the Council will allow for those energy efficiency savings to count towards achieving the target carbon emissions reduction of 28% rather than development needing to employ the reduction solely through renewable and low carbon sources.

The effect is that the Council is applying a target that overlaps with building regulations at best or else requires higher standards for energy efficiency. We do not believe this to be consistent with legislation. The amendment to the Deregulation Act 2015 to remove criterion 1(c) to section 43 was intended to ensure local authorities cannot require higher standards than building regulations. The requirement for at least 28% carbon emissions within policy CC1 is therefore contrary to the Act. This is because where development is not able to demonstrate 28% through energy efficiency measures consistent with the requirements of simply meeting building regulations then additional carbon emission reductions will need to be employed to satisfy the policy requirement.

The implications become clear when the practical application of the policy is considered. For example, in respect to typical warehouse buildings there is no benefit to either a developer or occupant to increase the energy efficiency of a portal steel framed structure with high levels of insulation if the warehouse is intended to be unheated because it is only to be used for storage and distribution. Just as there is no benefit to install renewable technologies to such buildings if there is no heating requirement and the lighting use is minimal because the building is only accessed during daylight hours.

The issue is not necessarily one of viability, but that the policy requires over engineering of buildings where installation of insultation and renewable technologies serves no real benefits for the environment because such a high standard of building construction is simply not necessary. It also needs to be remembered that over engineering also wastes resources by requiring materials to be fitted which will not be used in the habitation of the building.

There is also the issue of how the Council proposes to measure the 28% saving, as there is no mention of the base measure against which the saving is to be qualified. Is the base measure supposed to be before building regs requirements have been employed or are the requirements of building regulations the base measurement from which the reduction in carbon emissions need to be further reduced? Our experience has been that the Council accepts pre-2013 building regulation requirements as the base, but this is not explicit.

In any event, the effect of the policy is that the Council is attempting to introduce higher standards than building regulations, which is contrary to the Deregulation Act 2015 that makes clear how higher standards should not be sought. For the plan to be found sound it is, therefore, necessary to remove the target from the policy or change the wording to encourage applicants to achieve higher standards rather than apply such a requirement.

There is the additional issue with the policy, which is that it is already out of date. Under paragraph 11.11 of the justification to the policy, it is made clear how the target was set on the basis of the fourth carbon budget. The sixth carbon budget has now been published and further updates are expected in the future. Given the national target against which the policy is set is a moving target, and there is no doubt further updates will be introduced in the future, then it would be sensible to refer to a different source for a carbon reduction target. Alternatively, the policy should simply refer to building regulations, although there is little point to replicate legislation relating to building regulations. The question is raised

as to whether the Council needs to set an alternative target at all given the role of building regulations as the government's means of securing reductions in carbon emissions in the construction of buildings.

14.3 Is the approach of Policy CC2 to sustainable design and construction justified?

In respect to new residential buildings, policy CC2 refers to a 19% reduction in dwelling emission rates and a limit of 110 litres of water per person per day. We note that the 19% reduction is out of date given updates were introduced in 2016 to Part L1A of the building regulations. Additionally, the requirement for 110 litres per person is not consistent with Part G of building regulations, which actually requires water consumption to be calculated on the basis of 125 litres per day without optional requirements. The legislation does refer to 110 litres per second, but only when optional requirements are introduced, which are not a necessity of building regulations. It means that the policy is attempting to make optional requirements a necessity of development rather than simply optional for the developer to decide whether they are practical. As such, the policy is attempting to excerpt standards in excess of building regulation legislation, which is contrary to the Deregulation Act 2015 that makes clear how the planning system should not set higher requirements.

There is no justification for the policy to be either out of date or inconsistent with other legislation. For the policy to be found sound then the policy needs to be amended to refer to the requirements of the latest legislation, including the Deregulation Act 2015 and building regulations.

The policy also refers to how all new non-residential buildings over 100m2 to achieve BREEAM 'excellent'. This is on the basis that the local plan refers to the 2014 version of BREEAM. However, a new version was issued in March 2018, which sets more stringent standards. In advertently, the local plan now requires a higher standard of BREEAM to be achieved than taken account of through the drafting of the plan because the new BREEAM standards were released in March 2018 after the publication of the local plan in February 2018. This means that the evidence of the local plan, including the Local Plan Viability Report (CD018, April 2018) which assesses the costs on development of implementing the plan, does not assessed the true impact of BREEAM on development. Instead, the evidence base assesses the 2014 BREEAM standards on the viability of the plan, which did not have the same cost implications on development as the updated version of BREEAM.

Whilst it is admirable to drive for greater reductions in carbon emissions, the changes to the BREEAM standards in 2018 did not focus on reducing carbon, but instead introduced changes associated with reporting on the sourcing of materials, life cycle impacts and increasing insulation. Despite increasing the number of credits available in respect to the insulation levels of buildings, the other changes to BREEAM introduced in 2018 simply increased the bureaucratic nature of the process. Especially, as credits could be scored for the first time in relation to the use of project design computer software and additional reporting requirements were introduced in relation to the sourcing of construction materials.

As such, the changes to BREEAM in 2018 inadvertently introduced changes within policy CC2 that have not been assessed through the evidence base and do not make a positive contribution to achieving reductions in carbon emission. We therefore believe that for the plan to be found sound then the viability assessments within the local plan evidence base need to be updated to take account of the cost increases on development of the updated BREEAM process given the evidence base does not currently take into account the implications of the 2018 update.

We also wish to point out how BREEAM is out of date and has proven to be counter-productive to achieving sustainable development, especially in relation to achieving reductions in carbon. This is because of the way BREEAM is based on a series of considerations against which there are a defined number of points that might be gained towards an overall score. The limited number of credits in each section can means that there are insufficient credits available in order to achieve more than the necessary 90% required to achieve 'excellent' and even achieving 70% to be awarded 'very good' can be challenging due to the classifications and available credits in each section of the assessment.

For example, BREEAM is geared towards development within urban areas with established access to community facilities. As such, credits cannot be scored for development in locations that are not in close proximity to cash machines, schools or shops. Also, development can be exempt from credits relating to public accessibility if bus stops and train stations are not in close proximity. This means that most of the allocations for employment development, university education and new settlements are excluded from gaining points in relation to location. This is further made problematic because the development of greenfield sites also excludes sites from gaining points, along with the use of external lighting (a necessity in the development of greenfield sites and those away from urban areas) within the Energy section and also Health and Wellbeing section. Additionally, there are tensions to achieving BREEAM in respect to greenfield sites where points cannot be gained for dealing with contamination because there is generally no contamination found on greenfield sites.

The process is also highly bureaucratic as it requires the preparation of reports simply for the sake of producing reports to gain points. For example, in the Materials section a decent proportion of the overall BREEAM score relates to investigating thoroughly at least 6 different substructure and hard landscape designs along with four substantially different superstructure designs. For proposals involving the erection of typical warehouses it is unlikely that there are the required number of design options available to explore for such a building that would meet the approval of an engineer. Simply producing construction drawings for the sole purpose of gaining credits is an unnecessary expense for the applicant or developer that serves no useful purpose. As such, documenting processes and procedures, including the potential volume of waste and source of materials associated with the construction process is a cost on development that produces no tangible benefit or improvements to the building. We have been told that the costs of the process could actually fund the purchase of a 15kw photovoltaic system. Such information also has no bearing on improving energy efficiency or reducing carbon emissions.

At the same time, the opportunities for securing points in relation to energy efficiencies and carbon emission reductions are limited. This is because they represent only a small proportion of the total number of credits available. It means that developers can install solar panels, heat pumps, wind turbines and even if the building is effectively ‘off-grid’ and self-sufficient the development might still fail BREEAM if insufficient credits are gained in the other sections of the assessment.

Decisions made by the Council demonstrate how the requirement to deliver BREEAM ‘excellent’ is unjustified because of just how unachievable it is to gain the necessary points and also because of the costs associated with the bureaucratic process. For example, the extension to York District Hospital on the edge of the city under application 16/01195/FULM was exempt from demonstrating BREEAM ‘very good’ because of the cost of the process was considered to be prohibitive. Also, the redevelopment of the Banana Warehouse on Piccadilly, which is in the centre of York, has only had to demonstrate ‘very good’ because ‘excellent’ was not achievable (application 19/02293/FULM). An application for a waste transfer station at Rufforth has also not had to comply with BREEAM under application 16/00357/FULM.

Furthermore, it has become apparent that it is simply not possible to achieve BREEAM ‘excellent’ on the employment allocations within the local plan where they are greenfield sites outside of the main urban extent of York. This has become evident as the Council has granted planning permission for development on allocated sites without the requirement to satisfy BREEAM ‘excellent’, including those at Northminster Business Park and Elvington Airfield Business Park. These are just a few examples of many and we would ask the Council to report on the proportions of applications that achieve BREEAM or have been exempt over the last few years.

This is not isolated to the district of York, as other local planning authorities who have adopted similar policies are also having to waive the requirement for BREEAM to be demonstrated because it has

proved to be unviable, impractical and simply limiting in the opportunity to promote reductions in carbon emissions.

We also wish to point out there is no justification for the Council to require BREEAM in respect to listed buildings, which is a current requirement of the policy. Listed buildings are existing structures where their orientation, fabric and solar gain capabilities are predetermined. Having to deliver improvements in these areas are therefore limited by the nature of the buildings, and further limited by the emphasis in legislation on conservation and preservation. It means that attempting to satisfy BREEAM domestic refurbishment standards is all but impossible without major changes to the fabric of the building through the introduction of double glazing, insulation between joists and cavities and the introduction of modern renewal energy technologies.

Such measures can run counter-productive to the conservation and preservation of listed buildings. We therefore believe the requirement in the policy is inconsistent with the NPPF. Especially, as the Deregulation Act 2015 brought to the end the ability of local planning authorities to impose voluntary standards such as BREEAM. We understand how it might be appropriate to encourage applicants to undertake such assessments, but it is unjustified and inconsistent with legislation to impose standards. For the policy to be sound and consistent with legislation, we would suggest the wording should be amended to refer to any standards being desirable and encouraged, rather than required.

We agree that it is desirable to achieve reductions in carbon emissions through improved energy efficiency and supplies of low carbon energy, but BREEAM does not, and is not, the means of achieving the objectives of doing so as set out in the NPPF and the local plan. This is because BREEAM looks at the relative sustainability of a project through the construction and design process, taking into account the characteristics of the location of development. In doing so, there is very little emphasis on carbon reduction or reducing energy consumption, and far too much favouritism for redevelopment opportunities within urban contexts. Within this in mind, it is worth noting how the Councill's Climate Change Strategy 2022 (EX/CYC/104) does not refer to BREEAM.

Other local planning authorities are facing the same challenge and consequently there has been a move towards 'net zero' carbon buildings with the standards set out through the RIBA2030 challenge. The standards essentially set whole life carbon targets for projects, which is an approach advocated by the UK Green Building Council. We therefore believe that BREEAM is unhelpful in driving reductions in carbon emissions and energy efficiency savings and as such the current approach within policy CC2 is unjustified and inconsistent with national planning policy, and a different approach would better achieve the Council's objectives.