

North Dorset Local Plan Part 1 Examination

Statement on behalf of South Gillingham Consortium – ID 2984

Issue 2: Climate Change and the Natural Environment (policies 3 and 4), Including Renewable and Low Carbon Energy (Policy 22)

February 2015

Introduction

1. This statement is submitted on behalf of C G Fry & Son Limited, Welbeck Land, Taylor Wimpey, and the landowners at Newhouse Farm (the Consortium) in connection with the examination in public of the submitted North Dorset Local Plan Part 1 2011 – 2026 (LP1). Together the land owners and developers control approximately 102.3 hectares of land to the south of Gillingham, comprising 82% of the total site area within the proposed strategic allocation for the southern extension of Gillingham. These four parties are working together as a consortium to ensure a co-ordinated approach to the delivery of the Gillingham Strategic Site Allocation (SSA). This statement has been prepared jointly by the professional advisors of these companies and landowners.
2. This statement addresses selected Inspector's questions under Issue 2. It should be read in conjunction with the statements prepared by the Consortium in respect of Issues 1, 4, 5 and 8. The Consortium is working with the Council to agree a Statement of Common Ground and will endeavour to submit this to the Programme Officer no later than two weeks before the Issue 8 (Gillingham) hearing session on 18 March 2015.

Issue 2: Climate Change and the Natural Environment (Policies 3 and 4), Including Renewable and Low Carbon Energy (Policy 22)

3. This statement addresses the Inspector's questions 2.1 and 2.6:

Question 2.1: Are the requirements of policy 3: Climate Change sufficiently clear and flexible – are they deliverable and viable in relation to all types of development proposal? Are any of the requirements at risk of becoming outdated in a short timescale? Is the issue of flood risk adequately covered? What are the national targets referred to in policy 3(c)?

4. It is considered that Policy 3 lacks clarity in some respects and flexibility in others.
5. Policy 3 c provides appropriate flexibility by offering developers an option to either adopting a fabric-first approach to design or to incorporate renewable or low carbon measure. However, Policy 3 d removes this flexibility by imposing a hard and fast requirement for renewable or low carbon energy generation.

6. If the national targets referred to at Policy 3 c are building regulations, there is no need for them to be referenced in LP1.
7. It is not clear what the penultimate paragraph in Policy 3 means and what it requires of developers.
8. The Council presents no evidence to justify its claims in paragraph 4.17 that renewable or low carbon energy technology is the most efficient way of meeting Zero Carbon policy objectives or that it is viable in all cases.
9. The Housing Standards Review provides an opportunity to remove the majority of those climate change measures relating to building performance from the range of standards and guidelines (such as the Code for Sustainable Homes and Building for Life) and consolidate energy and water saving initiatives into the Building Regulations.
10. The Consortium considers that buildings should be built simply, built well and built to last. They should be well insulated and built to appropriate "air tightness" standards which would significantly reduce energy use. Buildings should also be simple to use. Technology such as air source heat pumps, solar pv, greywater recycling and rainwater harvesting measures all require operation and maintenance by homeowners.
11. The Consortium considers that Policy 3 should be re-drafted as a simple criteria-based policy and that it should not be repeated in other policies in LP1 such as Policies 17 and 21.
12. In the same way, the Consortium considers that Policy 4 is too long and reads as a statement. We advocate a criteria-based policy that addresses more succinctly environmental effects arising from development proposals. This would help make the plan more concise, focused and accessible (see the statement in Issue 1, question 1.14). As with amendments to Policy 3, it should not be repeated in other LP1 policies.

Question 2.6: What does the term 'local green space' encompass (in paragraph 4.105)? Should it be included in the Glossary of Terms?

13. Paragraph 4.105 and paragraphs 7.132 – 7.135 essentially reproduce provisions of the NPPF and does not need to be included in LP1 at all. This would assist in streamlining LP1.

Conclusions

14. The Consortium considers that:

- Extensive modifications are required to Policy 3 for it to be justified and effective
- Policy 4 reads as a statement and should be consolidated into a criteria-based policy
- The modifications suggested to Policies 3 and 4 would also help streamline LP1.