

Examination of the Guildford Development Management Policies

Hearing Statement: Matter 4 D12-D15: Sustainable and Low Impact Development; Climate Change Adaptation; Carbon Emissions from Buildings & Renewable and Low Carbon Energy Generation and Storage

Hallam Land Management Limited

This Hearing Statement has been prepared on behalf of Hallam Land Management Limited. Hallam submitted representations on the 16th February 2022 in response to the Development Management Policies document, as part of the Regulation 19 Consultation.

Main Question: Whether Policies D12-D15: Sustainable and Low Impact Development; Climate Change Adaptation; Carbon Emissions from Buildings & Renewable and Low Carbon Energy Generation and Storage are positively prepared, justified, effective and consistent with both national policy and the LPSS.

Supplementary Questions:

Is it justified for Policies D12 and D13 to revisit matters covered in LPSS Policy D2 and the Council's SPD?

1. This Hearing Statement only relates to D14, however it should be noted that Policy D14 would conflict with Policy D2. The requirement for a reduction of 31% is an increase over the measures required through Policy D2 for a 20% reduction in line with existing Building Regulations.

Do these policies conflict with, or unnecessarily duplicate matters covered by national guidance or legislation?

2. Policy D14 duplicates the requirements set out in the Building Regulations. It is considered this policy is unsound and should be deleted.
3. The policy proposes that all new dwellings must achieve a reduction in carbon emissions of at least 31% over the current targets in the Building Regulations. The Building Regulations is expected to introduce this requirement in 2025.
4. In accordance with the National Planning Policy Guidance (Paragraph: 009 Reference ID: 6-009-20150327) local planning authorities when setting any local requirements for a building's sustainability should do so in a way consistent with the government's zero carbon buildings policy and adopt nationally described standards.
5. Should this policy be adopted then the measures for the 31% reduction would need to be implemented in shorter timescales than that of the Building Regulations. This would place additional pressure on developers to adapt housing and could place additional costs through these shorter timescales. This could create viability risks on housing schemes across the

Borough, as developers would have to seek out quicker methods of addressing this requirement rather than being part of a national approach.

6. As set out in the Council's Viability Assessment (December 2021) should this policy be adopted then any future CIL levy should take account of these additional costs. This poses a new risk to the Borough of a lack of infrastructure monies being provided through development, placing additional burdens on resources and services.
7. There is a risk that should this local policy be adopted it becomes outdated with any updates to the national Building Regulations, therefore this policy is at risk of conflicting with national standards. The Government is introducing standards for carbon emissions through the Building Regulations; therefore, this policy should be deleted, and this matter controlled through national policy.


LRM Planning Limited

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