

NOTICE OF MEETING

Meeting: CABINET

Date and Time: WEDNESDAY, 1 MARCH 2023, AT 10.00 AM*

Place: COUNCIL CHAMBER - APPLETREE COURT, BEAULIEU ROAD, LYN DHURST, SO43 7PA

Enquiries to: democratic@nfdc.gov.uk
Tel: 023 8028 5071 - Karen Wardle

PUBLIC PARTICIPATION:

Members of the public may watch this meeting live on the [Council's website](#).

*Members of the public may speak in accordance with the Council's public participation scheme:

- (a) immediately before the meeting starts, on items within the Cabinet's terms of reference which are not on the public agenda; and/or
- (b) on individual items on the public agenda, when the Chairman calls that item. Speeches may not exceed three minutes.

Anyone wishing to speak should contact the name and number shown above no later than 12.00 noon on Friday, 24 February 2023.

Kate Ryan
Chief Executive

Appletree Court, Lyndhurst, Hampshire. SO43 7PA
www.newforest.gov.uk

This agenda can be viewed online (<https://democracy.newforest.gov.uk>).

It can also be made available on audio tape, in Braille and large print.

AGENDA

Apologies

1. MINUTES

To confirm the minutes of the meeting held on 15 February 2023 as a correct record.

2. DECLARATIONS OF INTEREST

To note any declarations of interest made by members in connection with an

agenda item. The nature of the interest must also be specified.

Members are asked to discuss any possible interests with Democratic Services prior to the meeting.

3. PUBLIC PARTICIPATION

To note any issues raised during the public participation period.

4. STRATEGIC RISK REGISTER UPDATE (Pages 3 - 16)

5. RURAL ENGLAND PROSPERITY FUND (Pages 17 - 22)

6. THE LEVELLING UP AND REGENERATION BILL - REFORM TO NATIONAL PLANNING POLICY CONSULTATION (Pages 23 - 42)

7. TOTTON COMMUNITY ENGAGEMENT (Pages 43 - 52)

8. DRAFT SUPPLEMENTARY PLANNING DOCUMENT: PLANNING FOR CLIMATE CHANGE (Pages 53 - 106)

To:

Councillors

Jill Cleary (Chairman)
Diane Andrews (Vice-Chairman)
Geoffrey Blunden
Steve Davies

Councillors

Michael Harris
Edward Heron
Jeremy Heron
David Russell

STRATEGIC RISK REGISTER UPDATE

1. RECOMMENDATIONS

- 1.1 That Cabinet are asked to review and note the contents of the Strategic Risk Register as part of the 6 monthly review process.

2. INTRODUCTION AND PURPOSE

- 2.1 Following the adoption of the updated Risk Management Policy and new Strategic Risk Register (SRR) in September 2022, this is the first refresh of the SRR, shown in Appendix 1.

3. BACKGROUND

- 3.1 Risk management aims to identify the risks that may impact on the Council achieving its objectives. Its purpose is to evaluate, design and implement effective measures to reduce both the likelihood and potential impact of these risks occurring.
- 3.2 The Council has a statutory responsibility to have in place arrangements for managing risks under the Accounts and Audit Regulations; which require a sound system of internal control, facilitates the effective exercise of the Council's functions and includes arrangements for the management of risk. As such it features strongly in the Council's Local Code of Practice for Corporate Governance and is one of the primary assurance strands in the Annual Governance Statement, which places significant reliance on a robust risk management framework.

4. STRATEGIC RISK REGISTER

- 4.1 The Strategic Risk Register (Appendix 1) captures the most significant cross cutting risks to the delivery of the current Corporate Plan and the proposed actions to mitigate these risks.
- 4.2 These risks have been identified with senior and executive council officers working alongside the Portfolio Holders to ensure a joined-up approach in capturing and documenting these risks.
- 4.3 The SRR includes the same 7 Strategic Risks as included on the previously adopted register. The SRR (at Appendix 1) now provides a progress update narrative on the actions required to further manage residual risk, noting that some of the actions are continual, whereas others are finite.
- 4.4 The Audit Committee reviewed and noted the SRR and the updates at their meeting on 27 January 2023.

5. FINANCIAL IMPLICATIONS

- 5.1 There are none arising directly from this report, although strong risk management and a solid understanding of risk helps to support robust financial management.

6. ENVIRONMENTAL MATTERS AND EQUALITY & DIVERSITY IMPLICATIONS

6.1 There are no direct environmental or equality and diversity implications arising from this report.

7. DATA PROTECTION IMPLICATIONS

7.1 There are no data protection implications arising from this report.

8. PORTFOLIO HOLDER COMMENTS

8.1 The Strategic Risk Register seeks to identify and mitigate strategic risk, to an extent which is both practicable and proportionate. I support the recommendation in the report. I am grateful for the work of officers and the Audit Committee in reviewing the register, the mitigation measures and actions proposed to further mitigate current residual risk.

For further information

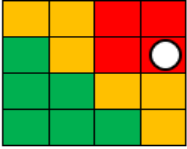
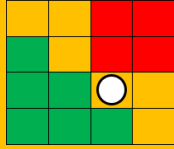
James Clarke

Insurance and Risk Officer

Tel: 023 8028 5002

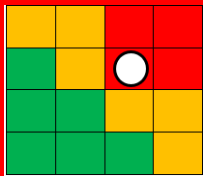
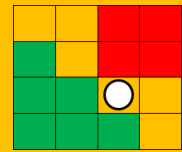
Email: James.Clarke@nfdc.gov.uk

1. Supporting Communities

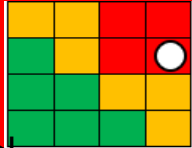
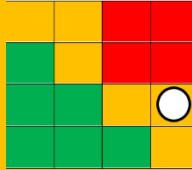
Inherent Risk Score	Current circumstance	Risk Control	Residual Risk Score	Action Required
<p>Likelihood 3 x Impact 4 = High 12</p> 	<p>Communities are likely to be negatively impacted due to the current rate of inflation and specifically the significant increase in fuel, food and utilities. This will create additional pressures on local businesses and job security.</p> <p>Communities are impacted through a shortage of housing including affordable housing Supply being delivered within the District. Lack of 5 years housing land supply/ will fail Housing Delivery Test in Nov 2022</p> <p>The Council needs to do more to support communities with enhanced digital channels for transacting and communicating with the Council.</p> <p>There will also be some challenges around the delivery of the Freeport</p>	<ul style="list-style-type: none"> A. Community focussed initiatives and funding streams B. Targeted support to voluntary and community sectors C. Engagement in key fundamental activities and discussions, eg; Solent Freeport, County Deals D. Close working partnership with the Community Safety Partnership with identified priorities as part of annual Partnership Plan E. Active engagement with skills advisory group F. Review and application of the Council's Local Plan, including active monitoring of the implementation G. Roll out of Digital Strategy <ul style="list-style-type: none"> - 'Customer First, Digital by design' H. Corporate Plan 2020-2024 I. Collaborative working with key partners as part of the Cost of Living Steering Group to implement a Poverty Action Plan J. Implementing a referral system to partners to support vulnerable residents K. Regular engagement with the voluntary sector L. Proactively working with developers/providing enabling infrastructure/ review of Local Plan M. Collaborative working through the Solent Freeport Consortium Limited, and presence on the board, and it's various sub-committees. 	<p>Likelihood 2 x Impact 3 = Medium 6</p> 	<ul style="list-style-type: none"> A. Allocate resource to support Corporate Plan priorities <i>Progress Update: Ongoing consideration within annual budget proposals.</i> B. Continue to work in partnership with other public sector partners to explore new and existing opportunities to deliver to residents and businesses <i>Progress Update: The council is engaged in relevant partnerships and governance to secure community benefit. Examples include the Solent Freeport</i> C. Resident Survey to be completed to further understand the needs and requirements of our residents <i>Progress Update: Resident survey has now been concluded and the results are in the process of being analysed. The survey provides important information about our residents health, wellbeing and financial circumstances which will continue to be monitored through a bi-annual survey</i> D. Full participation and regular updates on the Cost of Living Steering Group <i>Progress Update: Continued support to the Cost of Living Steering Group is provided, bringing a multi-agency approach to tackling issues affecting the most vulnerable in the community, working alongside the Local Partnership Campaign Manager to explore and promote further support to household.</i>

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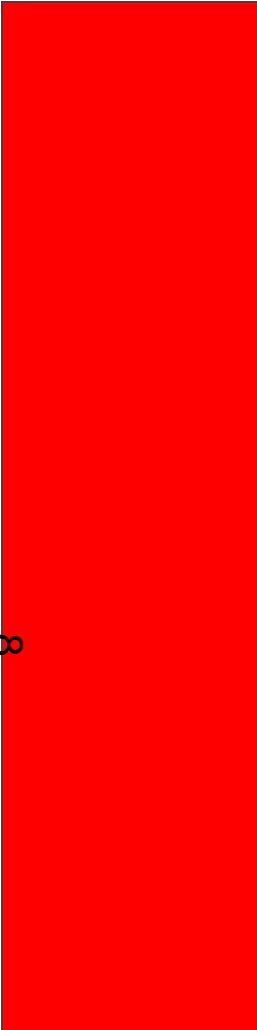
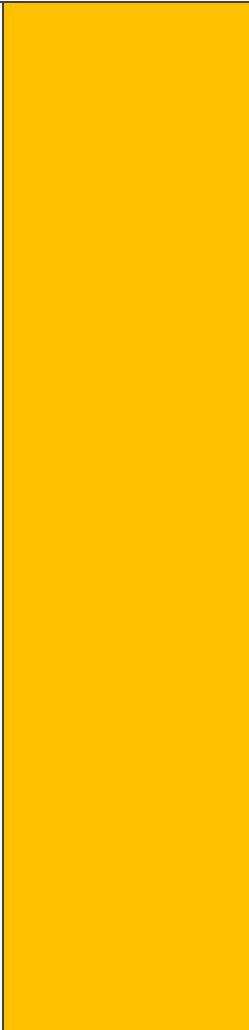

2. Achieving future financial resilience

Inherent Risk Score	Current circumstance	Risk Control	Residual Risk Score	Action Required
<p>Likelihood 3 x Impact 3 = High 9</p> 	<p>Many external economic factors, including the longer-term impact of COVID-19 recovery and the current rate of inflation (cost of living) have an impact on the Council's Medium Term Financial Plan; both in terms of expenditure pressures and the ability to generate new and existing income.</p> <p>Other factors, more specific to the Council include pay award, levelling up, the fair funding review, the impact of a business rate reset and increased salary costs resulting from a need to align pay with the wider market.</p> <p>The Council may also need to do more to support communities due to the potential for closure of local businesses and job losses as a result of the cost of living crisis.</p> <p>Parish and town councils may also find themselves in financial difficulties and may look to the District Council for support.</p>	<p>A. Regular review of the Council's MTFP including reserve levels and future changes to funding</p> <p>B. Annual budget setting for revenue and capital including funding</p> <p>C. Utilisation of external financial support that provides support for funding modelling</p> <p>D. Regular budget monitoring reports and updates to senior officers and Members</p> <p>E. Effective delivery of the transformation plan that includes actions that will support the closing of future budget gaps</p> <p>F. Development of savings plans and invest to save initiatives</p> <p>G. Treasury Management Strategy to ensure the Council is acting within the prudential indicators</p> <p>H. Maintain appropriate level of financial reserves as contingency arrangements to provide resilience over the medium term</p> <p>I. Development of capital plans in accordance with Capital Strategy with full financial appraisal and revenue implications</p> <p>J. Working with Towns and Parishes to maximise opportunities for joint working</p>	<p>Likelihood 2 x Impact 3 = Medium 6</p> 	<p>A. Continue to keep abreast of developments in:</p> <ul style="list-style-type: none"> - pay award - Fair Funding - National Business Rate Policy - Levelling Up - County Deals <p>Progress Update: Pay Award 22/23 concluded and funded, and additional allowance, beyond 2%, included within 23/24 MTFP.</p> <p>B. Maintain momentum and presence within the delivery of the Solent Freeport</p> <p>Progress Update: Actively ongoing.</p> <p>C. Develop the actions to address the Medium Term Financial Plan Deficit, and see through to delivery</p> <p>Progress Update: Updated MTFP and Budget proposal for 23/24 to be considered by Cabinet on 15 Feb and ultimately adopted by Council on 27 Feb.</p> <p>NEW ACTION</p> <p>D. Development of the Transformation Programme to deliver enhanced services and financial efficiencies to support the delivery of the Medium Term Financial Plan</p>

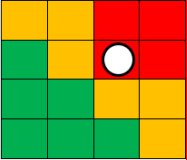
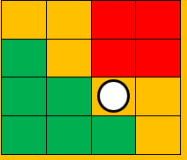
3. Ensuring efficient and effective internal control, governance and compliance

Inherent Risk Score	Current circumstance	Risk Control	Residual Risk Score	Action Required
<p>Likelihood 3 x Impact 4 = High 12</p> 	<p>As a local authority we need to show appropriate compliance and controls:</p> <ul style="list-style-type: none"> - Financial Management Code - Payment Card Industry Data Security Standard Accreditation - Production and publication of various statutory documents - Effectiveness of the Capital Change and Delivery Board - Effectiveness of the new Project Management Framework 	<ul style="list-style-type: none"> A. Annual internal audit plan developed by senior officers and members is targeted at key risks areas and responsive to new areas of risk B. External/internal audit regime C. Annual Assurance Statements compiled testing compliance with key business activities, supporting Annual Governance Statement compilation D. Range of performance indicators that monitor internal controls E. Maintenance of a range of policies that underpin the control framework – Financial Regulations, Counter Fraud Strategy, Risk Management Framework, Contract Procedure Rules coupled with staff training F. Regular reporting at Audit Committee G. Compliance with Transparency Code H. Compliance with Local Code of Corporate Governance I. Key compliance roles identified and assigned ie Section 151 Officer, Monitoring Officer, Data Protection Officer, H&S etc J. Compliance with information governance including the UK General Data Protection Regulation and Data Protection Act 2018 K. Review and update of Business Continuity Plans L. Housing Compliance reported regularly through EMT M. Information Governance Team in place with regular reporting through EMT. N. Financial Regulations and workflows built into core financial system 	<p>Likelihood 2 x Impact 4 = Medium 8</p> 	<ul style="list-style-type: none"> A. Continue through information governance work programme, including updated document retention and destruction schedules for all services. Progress Update: Currently ongoing with schedules for approximately 50% of the Council's business areas being approved and ready for implementation. Further progress is being made on the remaining business areas, with the majority of these close to conclusion. B. Management to undertake actions from the internal audit reports Progress Update: Risk is being managed by regular reports from Audit Committee to EMT as scheduled quarterly. C. To assess the effectiveness of the Capital Change and Delivery Board Progress Update: The Capital and Change Board (CCB) continues to provide governance to significant projects by regularly monitoring progress on delivery times, costs and risks with a call in mechanism for more substantial updates where required.

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				<p>D. To assess the effectiveness of the new Project Management framework for projects to ensure appropriate Governance arrangements are in place for all projects. Progress Update: Project Management capacity is a challenge and we will look to do this in 23/24</p> <p>E. Financial Management Code – to review how the Council complies with the new code Progress Update: An update will be forthcoming to a future Audit Committee.</p>
				

4. Creating the right culture, capacity and capability

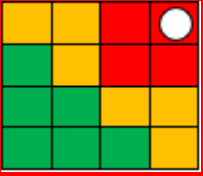
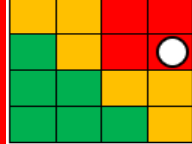
Inherent Risk Score	Current circumstance	Risk Control	Residual Risk Score	Action Required
<p>Likelihood 3 x Impact 3 = High 9</p> 	<p>The Council needs to attract, recruit and retain the high calibre of employee that it requires to fulfil its expectations in Service delivery.</p> <p>The current Leadership review and subsequent service reviews could create some unrest amongst the current Leadership team and other staff. There is also a risk around the time required to achieve organisational/cultural change.</p> <p>The emergence of Covid-19 has identified that the Council can effectively respond to a change in circumstances to ensure continuous operations. This rigor now needs to be applied to ensure this momentum continues and that positive experiences and benefits achieved as a result of recent changes are not lost, and that negative experience and challenges encountered in service delivery are addressed and improved upon.</p>	<ul style="list-style-type: none"> A. Employee Forum to encourage collaboration and engender a culture that enables change and innovation B. Learning and development programme providing training, tools and techniques to develop the necessary skills C. Regular 1-1's and annual PDI process D. Investigation and identification of further collaborations that will support building capacity and capability (and resilience) including both public and corporate business E. Staff Suggestion scheme F. Allowance within the council's budget for a pay spine review, to take account of the National Living Wage (NLW) forecast to April 2024 G. Transformation framework in progress H. Communications plan (internal) allowing for regular staff engagement/progress updates I. Staff/union engagement J. Project management/capability K. Performance management and key performance indicators in place L. Staff/officer wellbeing and support M. Development of Workforce Strategy and enabling an agile workforce N. Corporate plan 2020-2024 O. Hybrid working increasing potential pool of staff P. More support and training on virtual working/managing staff Q. Further ICT training to ensure maximum return on investment 	<p>Likelihood 2 x Impact 3 = Medium 6</p> 	<ul style="list-style-type: none"> A. Embedding of new Council Leadership structure <i>Progress Update: Strategic Director roles have been fulfilled and implemented.</i> B. Conduct and then progress learnings from employee survey <i>Progress Update: Employee Survey has been completed; results are being reviewed.</i> C. Undertake leading and developing programmes including fostering leadership skills <i>Progress Update: HR developing plans to work with third parties to deliver relevant exercises and courses</i> D. Keep abreast of developments in pay award negotiations and be ready to respond accordingly. <i>Progress Update: Pay award successfully delivered.</i> E. See through the emerging transformation framework into an approved direction of travel through the democratic process <i>Progress Update: Transformation plan being formulated to include design principles for a new operating model, approach, implementation, and necessary resources. A key aspect of the design principles will be our people strategy and organisational development opportunities. A full business case will be presented to the new administration following the May elections</i>

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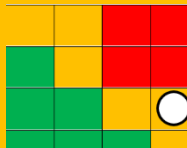
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- F. Develop and implement associated transformational strategies as necessary
[Progress Update: Currently ongoing and as per progress update narrative E.](#)
- G. Continue to identify further opportunities that should be progressed in connection with improving service delivery
[Progress Update: Currently ongoing](#)
- H. Allocate resource to support Corporate Plan ambitions
[Progress Update: Funding set aside in the 22/23 base budget has been allocated to align to corporate plan priorities, and the Council's proposed budget for 2023/24 is in the final stages of development, to further consider the creation of capacity to support corporate plan priorities.](#)
- I. Continue to work in partnership with other public sector partners to explore new and existing opportunities to deliver to residents and businesses
[Progress Update: Currently ongoing](#)

5. Ensuring robust security measures to protect the Council's data and assets from external threats

Inherent Risk Score	Current circumstance	Risk Control	Residual Risk Score	Action Required
<p>Likelihood 4 x Impact 4 = High 16</p> 	<p>This risk relates to the Council's ability to defend itself against the constantly evolving threat from cyber based attack. The Council, in common with other public bodies, should be regarded as a high-profile target given the impact and publicity a successful attack can have.</p> <p>The current insurance market for public sector cyber risks is volatile.</p>	<ul style="list-style-type: none"> A. Up to date Disaster Recovery plan is in place B. Awareness training of officers and staff on the threats of cyber attacks C. Continued reviewing and tightening of existing IT Security Policy to ensure measures adapt to the changing threat, including awareness, familiarisation and training. D. Acceptable use of IT policy to ensure staff are using equipment safely and appropriately. E. Relationships with other agencies to ensure best practice is established 	<p>Likelihood 3 x Impact 4 = High 12</p> 	<ul style="list-style-type: none"> A. Continued development of O365 services to improve email and anti-virus protections <i>Progress update: The Councils network, Microsoft 365 suite and access controls are continually monitored, assessed and improved in all areas including email security and anti-virus protections.</i> B. Carry out penetration test <i>Progress Update: ICT undertake an annual IT health check which includes a full penetration test. Any vulnerabilities identified within the test are put into a remedial action plan into an order of criticality.</i> C. Ongoing refresher training on cyber risks for all staff <i>Progress Update: Our ICT security eLearning training platform, uSecure periodically sends out security training to all users. This content is updated on a regular basis to ensure its current and contains new and existing threats/risks. The Security Team monitors course participation regularly.</i> D. To look at service provisions externally that can assist with cyber risks. <i>Progress Update: ICT are considering options for a Cyber Incident Response service</i>

6. Ability to be agile and shift focus in response to policy and national political change

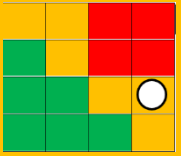
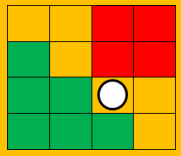
Inherent Risk Score	Current circumstance	Risk Control	Residual Risk Score	Action Required
<p>Likelihood 3 x Impact 4 = High 12</p>  <p style="writing-mode: vertical-rl; transform: rotate(180deg); position: absolute; left: -30px; top: 50%; font-weight: bold;">12</p>	<p>The significance of the current cost of living crisis and inflation, coupled with the need to repay the COVID bill may impact on government priorities and planning.</p> <p>Changes in national politics and general & local elections will have impact.</p> <p>Other legislation that will affect the council include:</p> <ul style="list-style-type: none"> - Levelling up white paper - The environment bill - Future planning reform - Changes the regulatory landscape to housing. <p>Managing the impact of climate change – impact on the coastline/managing the impact on the Council and communities resulting from increase in number of severe weather events/impact of increased temperature</p>	<p>A. Continuous monitoring of political landscape to allow for early indicators of policy change</p> <p>B. Prudent financial and strategy assumptions to allow for agile responses</p> <p>C. Corporate Plan 2020-2023 reviewed and updated where appropriate as changes identified that could impact on the Council and its plans i.e. Covid-19</p> <p>D. Section 151 Officer role providing advice to the Council on current/ future financial challenges</p> <p>E. Reports to committee include explicit assessment of implications and therefore should identify/reflect current and future challenges</p> <p>F. Executive to undertake horizon scanning look out/forwards and identify possible challenges ahead</p> <p>G. Membership of Local Government Association etc providing information/insights to the Council</p> <p>H. Members’ roles and responsibilities including involvement in local networks, County Council, other agencies and national forums, enabling insight to be gained and shared with the Council</p> <p>I. Staff membership of professional bodies enabling own development and also providing for insights through membership of challenges that may present themselves to the Council</p> <p>J. Officer/member forums and networks</p> <p>K. Review of Coastal Strategy and Actions. Climate Change Action Plan</p>	<p>Likelihood 2 x Impact 4 = Medium 8</p> 	<p>A. Making sure the workforce is aware that training is available. <i>Progress Update: Currently ongoing and will be supported through a new corporate learning management system, ready early 2023/24.</i></p> <p>B. Ensuring professional training availability as this impacts departments e.g., Planning and Legal <i>Progress Update: Currently ongoing and will be supported through a new corporate learning management system, ready early 2023/24.</i></p> <p>C. Encouraging staff to undertake professional development and service-related training. <i>Progress Update: Currently ongoing and will be supported through a new corporate learning management system, ready early 2023/24.</i></p>

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				<p>D. Prepare and implement the national changes arising out of the new Social Housing Charter, which represents the biggest change in social housing for 40 years.</p> <p>Progress Update: Work has been ongoing for the last 2 years to prepare and implement the necessary changes including report to Housing & Homelessness Overview & Scrutiny Panel on new resources required.</p>
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7. Delivering Council Services through adverse conditions

Inherent Risk Score	Current circumstance	Risk Control	Residual Risk Score	Action Required
<p>Likelihood 2 x Impact 4 = Medium 8</p> 	<p>The following may affect the delivery of Council Services from a national and local perspective:</p> <ul style="list-style-type: none"> - Natural disasters / local power outages - Workforce Strike Action - Global Pandemic - Terrorism - Riot/Rebellion - Flooding - Major pollutions of surface waters and groundwaters - Adverse Weather - Fire - Nuclear Powered Vessels related to pollution - Coastal Erosion - Industrial Strikes 	<ul style="list-style-type: none"> A. Business Continuity framework and individual service continuity plans B. Threat response plans which will include ICT Infrastructure response, alternative accommodation provisions and reallocation of staff. C. Emergency Planning Strategy and defined roles assigned D. Hybrid Working E. Communication with NFDC residents on all platforms e.g. social media 	<p>Likelihood 2 x Impact 3 = Medium 6</p> 	<ul style="list-style-type: none"> A. Annual programme of Emergency Planning training to be established <i>Progress Update: Currently Ongoing. Robust training continues to be arranged and carried out for officers involved in emergency planning. Work continues in ensuring business continuity plans are in place, including for interruptions due to energy outages.</i> B. Review and challenge of functional Service Continuity Plan and Conclude Business Continuity Planning. <i>Progress Update: Currently Ongoing</i> C. Review Hybrid Working <i>Progress Update: Review completed and Hybrid Working Policy updated and adopted.</i> D. Establish a dedicated role for focussing on emergency planning and business continuity to increase capacity for service to manage this risk <i>Progress Update: Recruitment looking to conclude early 2023</i> E. Training and exercising to establish a strategic and tactical response including an agreed rota <i>Progress Update: New rota system implemented.</i>

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				<p>F. Set up links to Town and Parish councils as they would be involved in implementing actions through adverse conditions.</p> <p>Progress Update: Currently Ongoing</p>
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RURAL ENGLAND PROSPERITY FUND

1. RECOMMENDATIONS

- 1.1 That the Cabinet note the content of this report and agree the proposed mechanism for the allocation of the Business Support element of the Rural England Prosperity Fund.
- 1.2 That the Cabinet agree that an Investment Plan be prepared for Cabinet approval to allocate the Community Infrastructure Improvements.

2. INTRODUCTION

- 2.1 The government launched its UK Shared Prosperity Fund (UKSPF) Prospectus in April 2022 as part of its Levelling Up agenda. The funding is intended to reduce inequalities between communities and covers the three-year period up to March 2025.
- 2.2 The UKSPF is in essence a replacement to the EU structural fund. The New Forest District Council received an allocation of £1 million; at the Cabinet meeting of the 29th July 2022 the priority themes for use of the Council's funding allocation were agreed.
- 2.3 In August 2022 the Council, along with other local authorities in England, submitted its investment plans for UKSPF to the UK Government. This Investment Plan is supported by Government.
- 2.4 The Rural England Prosperity Fund is a top-up to the UKSPF and is available to eligible local authorities in England. It succeeds EU funding from LEADER and the Growth Programme which were part of the Rural Development Programme for England.
- 2.5 The Rural England Prosperity Fund is referred to as the 'Rural Fund' in this report. Defra (Department for Environment, Food & Rural Affairs) is the government department administering the Rural Fund. DLUC (Department of Levelling Up and Communities) is the government department administering the UKSP Fund.
- 2.6 To access funding under the Rural Fund, Local Authorities were asked to provide specific additional information as an addendum to their UKSPF Investment Plan. The Rural Fund addendum was submitted on 30 November 2022. Local Authorities are awaiting an update on this process.
- 2.7 This Cabinet Report sets out the proposed Rural Fund delivery processes for the element of the fund that will support businesses and confirms the next steps to identify what the community infrastructure element of the fund will be allocated to.

3. BACKGROUND

- 3.1 Rural areas often face specific challenges including lower productivity rates, poorer connectivity and poorer access to key services
- 3.2 The Rural Fund supports the aims of the government's Levelling Up White Paper and Future Farming Programme. It funds capital projects for small businesses and community infrastructure. This will help to improve productivity and strengthen the rural

economy and rural communities. Rural Fund objectives sit within the UKSPF investment priorities for 'Supporting Local Business' and 'Community and Place'.

- 3.3 Rural Fund projects must be in a 'rural area' defined by Defra as: '*towns, villages and hamlets with populations below 10,000 and the wider countryside*'. Within the scheme area are also '*market or 'hub towns' with populations of up to 30,000 that serve their surrounding rural areas as centres of employment and in providing services*'. For these reasons, not all of New Forest District will be within the area covered by the Rural Fund. An outline map of the Rural Fund area is shown at appendix 1 however more detailed mapping will be available in due course.
- 3.4 Funding allocations were determined at local authority level, dependant on the area defined as 'rural' and is for the financial years 2023 to 2024 and 2024 to 2025. The allocation for the New Forest is £540,115.
- 3.5 This funding should not replace funding plans for rural areas under the UKSPF. It is a top-up to help address the extra needs and challenges facing rural areas.

4. RURAL FUND DELIVERY PROPOSALS

- 4.1 The New Forest Rural Fund allocation will be split 60/40 between projects to support businesses and those supporting community infrastructure. It is a capital grant programme only, it will not fund revenue costs such as running costs, staffing or promotional activities etc. It is also limited to small and medium sized enterprises in the programme area (defined as less than less than 250 employees and a turnover of under £12.9 million).
- 4.2 The Rural Fund scheme guidance allows Local Authorities to determine local priorities for funding within certain parameters set by Defra. The New Forest Rural Fund will prioritise capital funding to:
 - support new and existing rural businesses to develop new products and facilities that will be of wider benefit to the local economy. This includes farm businesses looking to diversify income streams.
 - support new and improved community infrastructure, providing essential community services and assets for local people and businesses to benefit the local economy.

5. RURAL FUND CAPITAL GRANTS FOR BUSINESSES

- 5.1 The Rural Fund business grants will be administered by the Economic Development team.
- 5.2 The Rural England Prosperity Fund ends in March 2025; however it is anticipated that grant funded projects will be completed by 31 December 2024 in order that the necessary reporting and scheme closure activities can be undertaken by the deadline. The grant application window will open when Defra launch the scheme, their ambition is that this will be in April 2023, and it will remain open to new applications until Autumn 2024 or when the budget is fully allocated.
- 5.3 The proposed New Forest Rural Fund criteria for applicants and projects is detailed at Appendix 2 but in summary, the fund will support small scale capital investment projects requiring grant support of £5,000 to £15,000. Applicants will be asked to

contribute a minimum of 10% cash match-funding which demonstrates their commitment to the project.

- 5.4 Applicants will initially submit an 'Expression of Interest' in order that basic eligibility checks can be undertaken. Eligible applicants will then be invited to submit a Full Application form and provide evidence to support their application such as quotations, financial forecasts etc.
- 5.5 Applications to the Rural Fund will be assessed by officers against the scheme criteria and guidance. Defra have not yet released this guidance however it is anticipated to include assessment criteria such as:
- Does the application demonstrate how the project will help the business to grow and improve productivity
 - Strategic fit
 - Value for money
 - Need and demand
 - Financial viability
 - Delivery and sustainability
 - Contribution to net zero and nature recovery objectives
- 5.6 Approved applicants will be issued with a Grant Offer Letter detailing the specifics of the project, key milestones and agreed outputs; the latter are specified by Defra and include the number of jobs safeguarded and created, number of businesses adopting new to the firm technologies or processes, number of businesses with improved productivity and number of new businesses created. The Grant Offer Letter will also specify how long the grant funded asset must remain in the business; it is anticipated that this detail will be clarified by Defra.
- 5.7 Cash-flow is an issue for many businesses undertaking capital investment. Therefore, as the detailed processes for delivery of the grants are finalised, consideration will be given to the timing of the payment of grant monies to beneficiaries.
- 5.8 The proposed Rural Fund criteria and delivery processes will be regularly reviewed and, if necessary, modified to reflect best practice and/or in light of emerging guidance from government or uptake of the fund.

6. RURAL FUND CAPITAL GRANTS FOR COMMUNITY INFRASTRUCTURE

- 6.1 The submission to UKSPF noted that rural isolation in terms of community cohesive and access to services was a problem across the District. The New Forest lacks a single major centre in the district, instead it is characterised by a number of smaller towns, including the rural hub towns of Ringwood and Lymington (in accordance with the Fund definition). Within this dispersed geography the role of parish halls and community centres act as vital hubs in creating a sense of community and pride on the local area.
- 6.2 It is important that they are physically well-maintained and are functional community spaces able to offer a range of uses both recreational and service-led for local residents. In line with the Council's response to climate change adaptation and transition to net zero, there is also a need to ensure facilities across the District such as parish halls and community centres are fit for purpose in this regard.
- 6.3 A total of £216,046 of the REPF has been allocated towards capital improvements across qualifying rural community venues. Work is underway to ascertain those

communities at greatest risk of isolation, and where there is opportunity to improve facilities and affect change. Based on the findings of this work an Improvement Plan will be developed identifying capital projects that can be delivered. The agreed projects will deliver physical improvement to halls and/or community centres in the qualifying rural areas which will either improve accessibility or the facilities within these buildings or ensure that the buildings are more energy efficient or deliver other physical adaptations to move towards net zero.

- 6.4 When preparing the UKSPF bid it was recognised that there was a need for improvements to St George's Centre at Calshot. The building currently provides a range of community services for the residents of Fawley and Calshot. Further work is required to conclude the details of the improvements that are most appropriate for this building. However, at this stage this is seen as a priority project and will be highlighted as such in the Improvement Plan. A separate report will be bought to Cabinet to agree the Improvement Plan and the associated spending profile of the Rural Prosperity Fund.

7. CONCLUSIONS

- 7.1 The New Forest Rural Fund proposals will support productivity and prosperity in the rural areas of the New Forest and activities that specifically address the challenges faced by the rural areas in the district.
- 7.2 The proposals are complementary to funding used to support rural areas under the UKSPF.
- 7.3 Defra's ambition is that the Rural Fund is open to applications in April 2023. As such the processes and details of the capital funding for rural businesses and support for new and improved community infrastructure are being developed and will reflect Defra guidance as and when it is available, with a view to launching the schemes by 30 April 2023.

8. FINANCIAL IMPLICATIONS

- 8.1 The Rural Fund allocation is to support capital investment for businesses and communities. There is no separate revenue funding for the administration of the Rural Fund capital grants programme. These costs are to be met from the administration budget aligned to the main UK Shared Prosperity Fund.
- 8.2 The administration budget aligned to the main UK Shared Prosperity Fund is 4% of the allocation (£1 million) i.e. £40,000 to undertake necessary fund administration for both UKSPF and the Rural Fund for the funding period: April 2023 to March 2025. This includes project assessment, contracting, monitoring and evaluation and ongoing stakeholder engagement.

9. CRIME & DISORDER IMPLICATIONS

- 9.1 None

10. ENVIRONMENTAL IMPLICATIONS

- 10.1 The Rural Fund Addendum Proposals outline how investments contribute to net zero and nature recovery objectives. These include:
- the UK's commitment to cut greenhouse gas emissions to net zero by 2050

- wider environmental considerations, such as resilience to natural hazards
- the 25 Year Environment Plan commitments

10.2 Projects that deliver the greatest economic, environmental, and social benefits will be prioritised.

11. EQUALITY & DIVERSITY IMPLICATIONS

11.1 The Rural Fund recognises disparity between urban and rural parts of the district.

12. DATA PROTECTION IMPLICATIONS

12.1 The project will require beneficiary data to be collected and shared with Defra in accordance with GDPR.

13 PORTFOLIO HOLDER COMMENTS

13.1 I welcome this £540,115 Rural Fund which is to be allocated over the 2023/24 and 2024/25 financial years. 60% of these monies will be carefully directed to provide grant support of between £5,000 and £15,000 for our small to medium sized rural businesses. We will be working with the Town and Parish Councils to develop an Improvement Plan to identify improvements to vital community facilities within our rural areas.

We hope that DEFRA will be able to launch the scheme in April 2023. The NFDC Economic Development team is standing by to advise potential applicants and to administer the grant making process. I urge everyone to spread the word about this funding for our vital rural businesses.

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Background Papers:

Business, High Streets & Tourism Portfolio Holder
Decision – 21 November 2022

Cabinet Report: UK Shared Prosperity Fund - 29
July 2022

Rural England Prosperity Fund: prospectus
Published 3 September 2022 available at
<https://www.gov.uk/government/publications/rural-england-prosperity-fund-prospectus>

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THE LEVELLING UP AND REGENERATION BILL - REFORM TO NATIONAL PLANNING POLICY CONSULTATION

1. RECOMMENDATIONS

1.1 It is recommended that the Cabinet:

- (a) Consider the content of the report and approve the suggested approach to the Council's response: and
- (b) Delegate authority to the Executive Head of Planning Regeneration and Economy in consultation with the Portfolio Holder for Planning, Regeneration and Infrastructure to make minor amendments to the response.

2. INTRODUCTION

2.1 The Government opened a consultation on planning reforms on 22nd December 2022. It is a wide ranging consultation seeking views on the proposed approach to updating the National Planning Policy Framework (NPPF). It is also seeking views on the proposed approach to preparing National Development Management Policies, how it might develop policy to support levelling up, and how national planning policy is currently accessed by users.

2.2 The consultation ranges from discussing proposals that will be brought in as part of the Bill, or subsequent secondary legislation, to changes that the Government hope to bring forward through amendments to the National Planning Policy Framework (NPPF) this spring. The Government further commits to a 'wider review' of the NPPF later this year. Therefore, the consultation contains three sets of proposals to reform the planning agenda, with the most sweeping of changes to the plan-making system being introduced in 2024 onwards.

2.3 The suite of proposals includes the following;

- The calculation of housing need and the application of local constraints and character in attempting to meet that need,
- Changing the circumstances in which the five-year housing land supply requirement needs to be demonstrated,
- Addressing issues relating to housing delivery and land supply tests as they relate to local authority performance,
- Increasing the accountability of developers and data regarding their performance on housing delivery,
- Promoting more beautiful homes, including through 'gentle densification',
- Safeguarding existing biodiversity on sites proposed for biodiversity net gain
- Making sure that food security considerations are factored into planning decisions that affect high quality farmland,
- Seeking views on how planning policy could address climate adaptation, alongside ongoing work on flood risk assessments and exploring a form of carbon assessment for development

- Enabling new methods for demonstrating local support for onshore wind development
- Outlining the programme of transition from the current method of Local Plan preparation to the new approach following the enactment of the Levelling Up and Regeneration Bill
- Outlining the approach to preparing National Development Management Policies.

The consultation closes on 2 March 2023 and the Government have suggested that they will respond to the consultation in the spring, publishing an updated NPPF as part of that response.

3. NEW FOREST CURRENT PLANNING CONTEXT

- 3.1 The Council's Local Plan Part 1 was adopted in July 2020 and prepared under the transitional arrangements afforded when the standard methodology for calculating housing need was first introduced. The housing requirement provided for in the Local Plan identified 10,420 additional homes within the Plan Area during 2016-2036 to help meet the needs of the District within the Southampton, Bournemouth and Salisbury housing market areas, directing larger scale provision to the main towns and larger villages.
- 3.2 The Council can not at this point in time demonstrate a 5 year housing land supply of deliverable housing land with working being finalised to produce an updated five year housing land supply figure taking into account last year's delivery of new houses along with the latest information about sites coming forward.
- 3.3 In such circumstances the NPPF (para 11d) indicates that the tilted balance is engaged, whereby in applying the resumption in favour of sustainable development even greater weight should be accorded in the overall planning balance to the provision of new housing.
- 3.4 the Council must also apply the presumption of sustainable development if the results from the Housing Delivery Test (HDT) fall below 75%. The HDT measures the number of homes delivered against the housing requirement over the previous three years. Members will recall that the HDT was introduced in 2018 to measure the number of homes required over the previous three financial years against the number of homes actually built, or delivered. Councils have often complained that this is an unfair test given the Councils' often limited role in actually building houses, and particularly as there are different sanctions applied depending on how poor the results are.
- 3.5 If results are below 95% of the requirement, then the Council must produce an action plan setting out how it plans to rectify the situation. If results are below 85% of the requirement, the Council must apply an additional 20% 'buffer' to its five-year housing land supply requirement (which essentially means that permissions should be granted for an additional 20% of homes above the required number in order to avoid the situation where decisions on future planning decisions needs to be taken in accordance with the presumption in favour of sustainable development, the aforementioned 'tilted balance'. If results are below 75% of the requirement, then the council must apply the tilted balance in any case.
- 3.6 The Housing Delivery Test (HDT) results published in February 2019 generated a requirement for the Council prepare a Housing Delivery Action Plan (HDAP), and to add a 20% buffer to the housing land supply. A Interim Housing Delivery Action Plan was published in January 2020 at Table 2;

Year	Requirement (based on household projections for 2015-16 to 2017-18. Compares to the adopted Plan target: 196 homes per annum)	Completions
2015-16	717	138
2016-17	726	350
2017-18	700	266
3 yr total	2,143	754
	Housing Delivery Test Result(completions/requirements)	35%
	HDT Consequence: Action Plan and 20% Housing Supply Buffer	

- 3.7 The results of the 2021 Housing Delivery Test covering the period 2018/19- 2020/21 was published by Government in January 2022, the results show that the Council achieved a Pass score of 141% in the Housing Delivery Test 2021 Measurement. The table below sets out the results of the Test

	2018-19	2019-20	2020-21	Total
Number of Homes required	300	275	200	774
Number of Homes Delivered	359	308	422	1089
HDT Measurement				141%

- 3.8 The Housing Delivery Test results for 2019-2022 would normally be expected to be published in early 2023 but have not yet been published.

4. CONSULTATION PROPOSALS

- 4.1 The consultation includes proposals to be brought forward on at least three different timescales. This report presents them in expected chronological order.

Changes - Spring 2023

Housing need

- 4.2 The consultation has made it clear that the national housing need figure of 300,000 homes per year remains and there will be no changes will not happen until 2024. This is because the Government has said they will 'review the implications on the standard method of new household projections data based on the 2021 census, which is due to be published in 2024'. Members will be aware that the starting point for calculating housing need is the 2014-based household projections which are now eight years old. It is considered likely that more up to date data on household projections would indicate a lower level of growth for the New Forest against the 2014-based data set. However, the Government remains committed to delivering 300,000 homes a year in the next couple of years, so what is not known is how any future review of the 2021 census data on household projections would feed into the formula for calculating housing need. Careful consideration will need to be given to how the Council approach future Plan making in light of this uncertainty.

'Alternative method' for calculating housing need in limited circumstances

- 4.3 The standard methodology for calculating housing need always been unpopular and has been subject to considerable national debate, particularly as the data used on household projections becomes increasingly out of date. The standard method has only ever been a starting point and the Government's current policy is that Councils can put forward a different method if there are 'exceptional circumstances'. There has not been guidance on what these circumstances might be, and it is one of the proposals within this consultation that the Government do set out in planning guidance circumstances where an alternative method might be acceptable.
- 4.4 The two examples given are an island with a large proportion of elderly residents, which could apply to the Isle of Wight, or a town or city with a large student population.
- 4.5 The draft response includes reference to how the New Forest has a higher than average percentage of elderly residents and other characteristics which could be considered to be exceptional, for example its geography 'sandwiched' between the coast and a national park together with a large student populations to either side of the District. In addition, the draft response makes reference to the number of environmental mitigation measures that are required to bring development forward in the District. These measures are required to comply with national legislation and therefore should be seen as a significant challenge to addressing housing need in future Local Plans. These characteristics may then be supported by the Government to allow us, in future plan-making cycles, to use an alternative method for calculating housing need. The strengthened clarity that the standard method is only the starting point is to be welcomed.

Role of Green Belt in meeting future needs

- 4.6 The clarification that local planning authorities are not compelled to undertake reviews of Green Belt for potential release of land for development where such needs cannot otherwise be achieved is welcome. Such an approach is considered to recognise the inherent permanency of Green Belt policy and does not preclude the local planning authority (or indeed other plan-making bodies) from undertaking such a review where particular circumstances may justify so. Nevertheless, clarity is sought as to how the potential impacts that this approach, in combination with other policies of the NPPF, would have on overall housing delivery across the country given the significant amount of Green Belt that exists in areas of likely significant future housing demand.

Constraints to meeting housing need

- 4.7 In addition the Government has said that 'if housing need can be met only by building at densities which would be significantly out-of-character with the existing area, this may be an adverse impact which could outweigh the benefits of meeting need in full'. This could be an argument that could apply to future Local Plan making as the capacity of the district diminishes and the availability of suitable sites reduces.
- 4.8 The Government wishes each authority to develop Local Design Guides or Codes in order to respond to national design guidance and ensure that place-making is consistent with a high-quality standard of design. Officers support the increasing recognition given in the NPPF to the importance of beautiful and attractive places.

Changes to five-year housing land supply

- 4.9 The tracked change version of the NPPF, subject to responses on the consultation, will be introduced this spring. One of the changes within that is to remove the need to demonstrate a five-year housing land supply if the Council has a up to date Plan (adopted in the past 5 years). The consequence of this is that the tilted balance could not apply to the determination

of planning applications for a number of years because of a lack of housing land supply which is welcomed.

- 4.10 The consultation also proposes to remove the need to apply a buffer to the five-year housing land supply calculation. Members will recall that in normal circumstances of 5% buffer is required to aid 'choice and flexibility in the market', however where HDT results fall below 85%, this is increased to 20%. This is a positive proposal and it is supported in the draft consultation response.

Changes to the Housing Delivery Test

- 4.11 Another proposal due to come forward in the Spring 2023 updated NPPF is the inclusion of a permissions-based test in the Housing Delivery Test (HDT). This test looks at the past three years' housing delivery against the housing requirement, and there are three penalties should delivery fall below 95%, 85% or 75%. The inclusion of a permissions-based test should be welcomed, as it recognises that this is the part of the development process that is within the control of Councils'. However, in order to make sure that the number of permissions will generate the required number of homes being delivered, the Government's proposals are to include a buffer on top of this part of the test. This buffer relates to the number of permissions that are never actually built, termed 'lapsed permissions'. Their evidence suggests that on average the number of permissions that do not translate into homes built on the ground is 15%, and so the proposal is that in order to be able to take advantage of this permissions-based test, a Council must demonstrate that it has permitted sufficient homes for its requirement and an additional 15% of homes. The draft response questions whether this buffer is too high and suggest that locally determined 'lapse rates' should be used to ensure that the number of permissions granted is not excessive.

Wider Review – Late 2023 29.

- 4.12 This consultation sets out the scope of a wider review of national planning policy to be undertaken later in 2023. There is little detail on these proposals but it is understood that there will be further consultation later this year.

National Development Management Policies

- 4.13 The consultation references the introduction of a suite of National Development Management Policies (NDMPs) which will be implemented following the passing of the Levelling Up and Regeneration Bill (LURB) later this year. The consultation makes it clear that these policies would be separate to the NPPF with the same weight applied to them as to the development plan, i.e. the Local Plan. This is important because to date government guidance has been of a lesser status in the determination of planning applications than policies within the Local Plan, but the intention is to streamline the Local Plan production process and to avoid repetition of policies that are largely consistent across the country.

Biodiversity and Climate Change

- 4.14 Other proposals planned as part of the future wider review relate to the potential for further protection for irreplaceable habitats, such as ancient woodland, and the intention to work with Defra to avoid the degradation of sites before planning applications are submitted, which will be important in terms of calculations of biodiversity net gain. Other proposals that may come as part of a wider review include ways of the planning system making a greater contribution to climate change mitigation and adaptation the continued lack of a clear statement on how the planning system should address the transition to net zero carbon is a disappointing omission. This is proposed to be addressed in the next iteration of the NPPF in 2024, this leaves increasingly little time for policy-makers and decision-takers to implement this at a local level.

Ending the Duty to Co-operate

- 4.15 Another proposal to follow in the wider review is the abolition of the duty to cooperate. However, this duty is to be replaced by alignment policy and further consultation will be undertaken to understand what that might mean in practise. This is likely to have implications for the work of the Partnership for South Hampshire, particularly because the consultation is clear that any unmet need arising from authorities which have to apply an 'urban uplift' to their housing needs targets, which includes Southampton, should not be exported to neighbouring planning authorities, unless a voluntary agreement is reached.

Revised Planning System - 2024 34.

- 4.16 The final timescale for introducing planning reform is via a revised planning system which is predicted to be in place in late 2024, following the enactment of the LURB and potentially secondary legislation.

Streamlining Local Plans

- 4.17 This new planning system largely relates to a requirement to deliver local plans more quickly. Local planning authorities would be required to start a review by five years after the date of adoption of their latest local plan and would have no more than 30 months to adopt the next one. Careful consideration will need to be given to this revised timescale as Local Plan Review work progresses. The consultation document sets out complicated transitional arrangements for the introduction of a new plan-making system. In an attempt to speed up the Plan Making process it is proposed to the removal of the 'justified' test of soundness.
- 4.18 Also of note is that Supplementary Planning Documents (SPDs), would need to be replaced by Supplementary Plans which would carry the same weight as Local Plans, and that the existing SPDs would cease to have effect at an as yet undefined point in time.

5. CONCLUSIONS

- 5.1 This consultation is far reaching and sets out future changes in relation to housing need, housing supply, design, protecting the environment and tackling climate change, new national development management policies and a future plan making system, all within the context of enabling levelling up and regeneration. This report highlights those proposals that are most significant for the District. Many of the proposals within the government consultation are not detailed and will be subject to further consultation. The draft consultation response is provided as appendix 1.

6. FINANCIAL IMPLICATIONS

- 6.1 There are no immediate financial implications arising from this consultation.

7. CRIME & DISORDER IMPLICATIONS

- 7.1 None.

8. ENVIRONMENTAL IMPLICATIONS

- 8.1 There are a number of proposed changes to the Planning system included in this consultation that if implemented will serve to further protect and enhance the environment of the New Forest.

9. EQUALITY & DIVERSITY IMPLICATIONS

9.1 None

10. PORTFOLIO HOLDER COMMENTS

10.1 Whilst there is a way to go before we have full details of all the potential planning reforms signalled in the consultation, the general direction to provide more discretion and self-determination to councils and to local communities is encouraging. The recognition that areas need to set housing targets and standards that properly reflect the circumstances in their area is helpful, as are changes to remove housing supply tests that undermine local plans and public trust in the planning system. Also, I welcome the reaffirmation of the importance of nature recovery and protecting irreplaceable habitats and the Green Belt.

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Background Papers:

None

Consultation Questions

1. Do you agree that local planning authorities should not have to continually demonstrate a deliverable 5-year housing land supply (5YHLS) as long as the housing requirement set out in its strategic policies is less than 5 years old?

The Council agrees that local planning authorities should not have to continually demonstrate a deliverable 5YHLS. The appropriateness and deliverability of local plan targets and sites is tested at examination stage, taking into account best available information including developer and other relevant views of delivery timescales for the site build out and for the provision of any necessary infrastructure that may bear on the site timetable. The relevant soundness tests include ensuring that the local plan is sufficiently flexible, which should buffer any unforeseeable change of circumstances on any given site. In addition, based on the NPPF and LURB proposals the process of identifying sites for the following plan period will typically commence within at most 30 months of the adoption date of the local plan in order to meet the five year review deadline. However there needs to be clarification on what is meant by 'the housing requirement as set out in strategic policies is less than five years old'. There needs to be certainty whether the period starts at date the Plan is submitted for examination or the date of adoption.

2. Do you agree that buffers should not be required as part of 5YHLS calculations (this includes the 20% buffer as applied by the Housing Delivery Test)?

The Council agree that buffers should not form part of the 5YHLS calculation. The supply buffer and presumption in favour approach has critically undermined the plan-led system and public trust in the planning system. It has also created a perverse incentive for developers to overstate delivery rates and timescales at examination stage, on the hope or expectation that within a relatively short period delivery shortfalls would lead to application of the presumption in favour of sustainable development, weakening the LPAs ability to apply their adopted plan policies. The presumption at application level also works against the achievement of sustainable development in aggregate by undermining the prioritisation of urban and brownfield development first, and by undermining the coordinated alignment between planned growth and the provision of infrastructure needed to support and enable that growth. As noted in (1) above the appropriateness of the housing target and the sources of supply to meet it can and should be resolved at examination stage.

3. Should an oversupply of homes early in a plan period be taken into consideration when calculating a 5YHLS later on or is there an alternative approach that is preferable?

The Council support the proposal to enable oversupply to be taken into account within reason in relation to the start date for past oversupply. For example, an emerging local plan should be able to take account of oversupply in the currently adopted plan period, as past oversupply would then be re-set each time a plan is submitted and examined. This would improve overall fairness or balance as the standard method already provides an uplift over the demographic baseline e.g. based on market signals, the reason why the extant NPPF-NPPG does not require consideration of past housing undersupply.

4. What should any planning guidance dealing with oversupply and undersupply say?

Provided that the replacement plan is submitted for examination no more than 5 years from the adoption date of the current local plan, housing oversupply against the most recently adopted local plan target can be treated as contributing to meeting need for the replacement plan.

5. Do you have any views about the potential changes to paragraph 14 of the existing Framework and increasing the protection given to neighbourhood plans?

The Council supports the proposal to give additional protection be given to areas with neighbourhood plans that have allocated development sites, which is the practical effect of the suggested changes to 14 (a) and (b). These changes would replace the protection previously provided under clause (c). Such protection is warranted as it is a significant, costly and risky piece of work to carry out housing allocations at this planning tier/level, and the communities that choose to do so should be appropriately rewarded to ensure that their vision can be achieved and not easily stymied by speculative alternative development proposals that are not plan-led. The deletion of 14 (c) and (d) is consistent with proposed changes to buffers elsewhere.

6. Do you agree that the opening chapters of the Framework should be revised to be clearer about the importance of planning for the homes and other development our communities need?

The Council agreed that the NPPF could be clearer about the importance of planning for homes and other development our communities need supported by the right infrastructure.

7. What are your views on the implications these changes may have on plan-making and housing supply?

The Council consider that there should be a commitment to review the standard methodology to take into account more up to date data and that this change should take place as soon as that data is available rather than waiting until 2024.

The impact on realistically achievable housing supply, as opposed to the achievement of need as calculated by the standard method, should not be overstated. The standard method would continue to apply in locations where it can be sustainably met, and where it cannot be sustainably met standard method-based targets would not have been adopted or achieved anyway. The proposed changes may reduce the prospects of success for sites closest to the margins of sustainability pursued speculatively under the tilted balance approach. Conceivably this may have a modest dampening effect over time on supply in areas that are significantly affected by NPPF footnote 7 constraints, and/or that have insufficient available land suitable for development. However it is these marginal speculative sites that tend to be most problematic for communities' trust in a plan-led system and the proper coordination of infrastructure and service provision.

The NPPF could and should say more about how and where the government's national house building objectives should be met, rather than relying on a formula that is not sustainably deliverable in many areas where current growth pressures are highest. It would be helpful to include in the NPPF a high level positive strategy that better aligns the provision of homes and other development with sustainable opportunities to deliver on the levelling up agenda and major infrastructure spending commitments. As a minimum it would be helpful to update the NPPG to specifically identify levelling up as one of the reasons to do more than the standard method starting point, where it is sustainable to do so.

8. Do you agree that policy and guidance should be clearer on what may constitute an exceptional circumstance for the use of an alternative approach for assessing local housing needs? Are there other issues we should consider alongside those set out above?

The Council agrees that there should be clarity on what constitutes exceptional circumstances for the use of an alternative approach for assessing housing need. As circumstances will vary a statement based on sustainable development principles would be preferable to attempting to compile an exhaustive list of possible considerations.

9. Do you agree that national policy should make clear that Green Belt does not need to be reviewed or altered when making plans, that building at densities significantly out of character with an existing area may be considered in assessing whether housing need can be met, and that past over-supply may be taken into account?

Green Belt is widely perceived by the general public to be protected land that should not be developed. Notwithstanding long-running political and development industry debates about the pros and cons of Green Belt designation, the NPPF as proposed to be revised continues to identify Green Belt as a footnote 7 constraint, locations where housing and other built development is deemed not appropriate in most circumstances.

Green Belts should nonetheless be reviewed periodically to ensure that land subject to its controls still serves the purposes of Green Belt. It should not be necessary to do so every plan-making cycle.

10. Do you have views on what evidence local planning authorities should be expected to provide when making the case that need could only be met by building at densities significantly out of character with the existing area?

This Council considers that character and landscape assessments could be used to evidence why an authority's housing need can only be met by building at densities significantly out of character with the existing area. Character assessments could look at distinct areas of a district, borough or city and set out the range of residential densities that can be found in that area. However, to ensure robustness appropriate densities would need to be set out, and agreed, within a Local Plan or Local Design Code and be fixed for a number of years. Arguably, this timeframe should be at least five years in accordance with the lifespan of strategic policies on housing requirements. It maybe within an administrative area there is a strong case for different densities across the area reflecting matters such as the need to be able to maximise densities on urban regeneration sites where viability is an issue

11. Do you agree with removing the explicit requirement for plans to be 'justified', on the basis of delivering a more proportionate approach to examination?

Yes as a separate test, as it is not the wholesale abandonment of evidence some commentators have suggested it to be. Any departure from meeting standard method OAN in full will still need to be justified for the plan to meet the test of being positively prepared (as it is proposed to be amended). The plan will still need to achieve sustainable development, justified or evidenced by a sustainability appraisal. Previous NPPF/G changes has already removed the requirement for a plan to be the most sustainable of all reasonable and sustainable alternatives, but the SA process still requires all reasonable alternatives to be tested so that will remain part of the plan-making process (assuming this requirement remains in place when EU-based legislation made into UK law is replaced with domestic legislation).

The Council is concerned that the removal of the words 'an appropriate strategy' would remove the obligation on the Local Planning Authority to define its vision and strategy for growth in the district which is surely the purview of locally elected representatives, rather than a potential representor on the plan. In addition, much of the evidence is required either by national policy or guidance, or legislation.

The test of soundness that could usefully be amended is the need to evidence the effectiveness of plan policies over the plan period. This is a key driver of much evidence to demonstrate that policies can be delivered in ten plus years. Given the need to review Local Plans every five years, this test could usefully be altered to 'deliverable over the next five year period' which in itself would reduce the level of detail that many evidence-based studies need to go into.

12. Do you agree with our proposal to not apply revised tests of soundness to plans at more advanced stages of preparation? If no, which if any, plans should the revised tests apply to?

Once the updated NPPF is published LPAs currently at an advanced stage of plan preparation should be given the option to be examined under their choice of transitional or updated arrangements, stating which when a date is set to submit the plan for examination. One of the reasons justifying a flexible approach is to reflect the lead-in times for evidence studies LPAs may have already commissioned to ensure they are not wasted unnecessarily.

13. Do you agree that we should make a change to the Framework on the application of the urban uplift?

The urban uplift is arbitrary and appears undeliverable in many cases. It should be refocused to urban areas that have administrative control of surrounding land, and complemented generally with mechanisms to maximise the sustainable use of urban and brownfield land, including non-planning mechanisms e.g. to at least level the cost and viability playing field relative to using greenfield land.

In the interests of transparency and to help amplify Government policy, further details and explanation are sought from the Government on the methodology that is used to determine which areas the uplift applies to, and the reason as to why 35% has been chosen as the figure to apply.

14. What, if any, additional policy or guidance could the department provide which could help support authorities plan for more homes in urban areas where the uplift applies?

The Council welcomes the consultation proposals to help ensure that the urban uplift is delivered in those urban areas, rather than spilling over into neighbouring authorities and putting undue pressure on greenfield sites. This is a concern that has been felt our work on a subregional level given the inclusion of Southampton in the list of the top 20.

Revised NPPF should stress that housing uplift in cities must be part of a planning balance that also plans and provides for other sub-regionally important functions e.g. employment, retail.

15. How, if at all, should neighbouring authorities consider the urban uplift applying, where part of those neighbouring authorities also functions as part of the wider economic, transport or housing market for the core town/city?

We agree that the housing need must be met within the urban area where there is the supporting infrastructure available. A significant concern would be that in a situation where there is unmet need, the area to meet the uplift could extend to out of date 'Housing Market Areas' (HMA) based on pre-Covid pandemic modes and frequencies of travel and would not reflect the much larger geographic catchments for jobs now that hybrid working is common practice. To use old HMAs would be inappropriate given that those peripheral areas do not have access to the jobs and public transport solutions and are therefore more car dependent, less sustainable locations. Areas within the same HMA can be very distinct in terms of character and it would be inappropriate to allow the urban uplift, which is designed to increase housing in the most sustainable locations, to spill into less sustainable peripheral locations.

The Council remain unconvinced that there is a sound rationale for the 35% uplift in Southampton and question whether this is the right approach particularly if it results in the loss of other uses (employment, retail, etc.) for have play an important sub-regionally role to neighbouring authorities.

16. Do you agree with the proposed four-year rolling land supply requirement for emerging plans, where work is needed to revise the plan to take account of revised national policy on addressing constraints and reflecting any past over-supply? If no, what approach should be taken, if any?

It is reasonable to have some buffer for the transitional period.

17. Do you consider that the additional guidance on constraints should apply to plans continuing to be prepared under the transitional arrangements set out in the existing Framework paragraph 220?

The Council considers that any additional guidance on constraints that could be applied to plans at a significantly advanced stage would be likely to slow down plan making.

18. Do you support adding an additional permissions-based test that will ‘switch off’ the application of the presumption in favour of sustainable development where an authority can demonstrate sufficient permissions to meet its housing requirement?

The current Housing Delivery Test undermines the Plan-led system. It holds local authorities solely accountable for the level of housing completions or lack of completions in their planning area when in many cases this is something that local authorities have very limited control over because they do not themselves build and deliver most housing. This places pressure on authorities to release more land for development or increases the risk of local authorities facing speculative planning applications for housing development in locations not allocated in the development plan and ultimately delivering unsustainable development. The addition of a sufficient permissions-based test would provide the possibility to judge local authorities on an element of the system they have some control over and not automatically place local authorities under ‘the presumption’ solely because housebuilders fail to build sufficient homes to meet the local authority’s annual housing target figure.

However, more details need to be set out as to how the sufficient permissions test would work in practice, i.e., what permissions would count and how would planning permissions for a large number of dwellings (e.g., 100 or 200 or 300 etc.) be apportioned over the period, would a standardised average annual build-out rate generated by Government be used to calculate what could reasonably be completed over the period assessed against or would it be based on a local authority’s published housing trajectory or would the entirety of the dwellings granted in such a permission be counted in full over the relevant Housing Delivery period.

19. Do you consider that the 115% ‘switch-off’ figure (required to turn off the presumption in favour of sustainable development Housing Delivery Test consequence) is appropriate?

The Council do not support this approach and sees it as unnecessary and inherently inconsistent with the emerging national policy proposal to remove the buffer requirement from the five-year housing land supply calculation. There should be no necessity for the ‘switch-off figure’ to be any more than 100% of the requirement, bearing in mind the need for the sites to be ‘deliverable’ in order to be counted. Additionally, the requirement to pass the Housing Delivery Test is for 95% or more of homes to have been delivered against the three-year target so there will be some degree of supply flexibility against this in any event.

Requiring significantly more permissions to have been granted risks placing authorities under additional pressure to permit speculative applications to achieve the flexibility buffer and risks undermining the Plan-led system.

If the 115% requirement were to be retained, it should be clarified that permissions do not need to be subject to an appraisal of their deliverability against the NPPF glossary definition, and the status of council resolutions to grant permission subject to a s106 should be clarified.

20. Do you have views on a robust method for counting deliverable homes permissioned for these purposes?

Permissioned sites can be assessed under the current NPPF definition of ‘deliverable’ to ensure a robust method for counting deliverable homes.

21. What are your views on the right approach to applying Housing Delivery Test consequences pending the 2022 results?

The publication of the 2022 Housing Delivery Test results should be delayed until the proposed changes to the way in which the Housing Delivery Test will operate has been finalised. Until the new Housing Delivery Test has been finalised, its consequences should be frozen to reflect the 2021 Housing Delivery Test results.

22. Do you agree that the government should revise national planning policy to attach more weight to Social Rent in planning policies and decisions? If yes, do you have any specific suggestions on the best mechanisms for doing this?

Yes as it meets the highest priority of need, but it will likely need non-planning support through government grants to assist development viability to avoid consequent reductions the delivery of other affordable tenures such as affordable rent and shared equity.

23. Do you agree that we should amend existing paragraph 62 of the Framework to support the supply of specialist older people's housing?

Yes. It should make clear what this 'specialist' accommodation should provide, in respect of space and accessibility standards, together with the different levels of care they would be expected to enable. Too much of current market retirement provision might be characterised as an overpriced 'lifestyle' product that provides little in the way of useful care or health services to support residents through the ageing process, essentially 'moving them on' when care is most needed (overpriced as second hand units routinely sell at a substantial discount to new, reflecting high service charges for limited service provision).

24. Do you have views on the effectiveness of the existing small sites policy in the National Planning Policy Framework (set out in paragraph 69 of the existing Framework)?

The current NPPF requirement at paragraph 69(a) for local authorities to identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, is entirely arbitrary and it is not clear how this assists plan-making (it may create additional work by either lengthening the time-taken and work needed for the site identification process in order to meet the 10% figure or through authorities having to produce extra evidence to demonstrate why they cannot meet the 10% figure).

25. How, if at all, do you think the policy could be strengthened to encourage greater use of small sites, especially those that will deliver high levels of affordable housing?

Small sites rarely deliver high levels of affordable housing as the threshold for onsite affordable housing provision is usually 10 units. On sites above the threshold, First Homes will help. Funding support for registered providers may assist them to compete for land.

26. Should the definition of "affordable housing for rent" in the Framework glossary be amended to make it easier for organisations that are not Registered Providers – in particular, community-led developers and almshouses – to develop new affordable homes?

Yes, as long as such provision meets reasonable standards or principles for affordability and eligibility, which may need to be defined. Important that any other organisation has the ability, resource and longevity to ensure that the AH will remain as such and be managed. Care would need to be taken to ensure that this option could not be abused by those providers who may wish to maximise profit or to control the occupancy of affordable homes

A key requirement could be that organisations are a non-profit organisation or charity, and that any excess funds are ringfenced for the maintenance and/or provision of further affordable homes. In the case of homes for social or affordable rent, the non-registered provider should also be required

to seek allocation of their site in Local Plans, to ensure they help meet local affordable need and that homes are appropriately prioritised to households on the Council's Housing Register.

27. Are there any changes that could be made to exception site policy that would make it easier for community groups to bring forward affordable housing?

28. Is there anything else that you think would help community groups in delivering affordable housing on exception sites?

29. Is there anything else national planning policy could do to support community-led developments?

(27-29) Access to land at a viable price is the critical issue, the planning system itself is already sufficiently enabling if a site can be found. Any policy change that served to crystallise landowner hope value would make the delivery of exception sites more difficult. For example, our experience in a footnote 7 constrained area is that the possibility for a portion of enabling market development has not helped to bring sites forward. Land owners sit on them waiting for an opportunity for 40 times agricultural value.

30. Do you agree in principle that an applicant's past behaviour should be taken into account into decision making?

Whilst in principle this sounds a positive initiative there would be clear difficulties in applying this in practice. Consideration needs to be given to the fact that planning permission runs with the land and not the applicant. It is acknowledged that that public confidence in the planning system is undermined when planning rules are deliberately ignored. In terms of the types of past behaviour that should be considered to be in scope, the Council has experience of developers deliberately clearing land which contains protected species and ecologically valuable habitats, failure to pay contributions required under Section 106 and CIL and not building in accordance with approved plans.

However, the Council recognises the difficulty in applying this in practice especially in the context of the long-standing principle that planning decisions should be based on the planning merits of the proposed development and not the applicant

31. Of the two options above, what would be the most effective mechanism? Are there any alternative mechanisms?

The current planning enforcement system could be reviewed to ensure that there are measures that the Council could quickly deploy to address actions by developers to work around the planning system.

32. Do you agree that the three build out policy measures that we propose to introduce through policy will help incentivise developers to build out more quickly? Do you have any comments on the design of these policy measures?

The measures proposed will be helpful. It would make sense for local plan site allocation proposals and planning applications to include a proposed delivery schedule, to be updated and put on public record at the point of examination/application determination respectively. Annual completion reports should include an explanation for any shortfalls and how they can be made up (equivalent to a Housing Delivery Test action plan and perhaps using the same % shortfall thresholds for intervention). However it must be recognised that there will be genuine reasons why developers can not bring development forward.

33. Do you agree with making changes to emphasise the role of beauty and placemaking in strategic policies and to further encourage well-designed and beautiful development?

Yes. This makes not only new development more acceptable but also raises the possibility for higher intensities of development to be made acceptable to communities. But take care that beauty is understood as being not just about buildings themselves, but about the whole development including streets as well as spaces and buildings.

34. Do you agree to the proposed changes to the title of Chapter 12, existing paragraphs 84a and 124c to include the word 'beautiful' when referring to 'well-designed places', to further encourage well-designed and beautiful development?

Para 124e uses the word 'beautiful' clumsily where attractiveness is already present. It is important to ensure that decision makers, applicants and communities avoid the tendency to think of design as being just about aesthetics so reference to "the importance of beauty in securing efficient land use through creating well-designed, attractive and healthy places."

35. Do you agree greater visual clarity on design requirements set out in planning conditions should be encouraged to support effective enforcement action?

The Council agrees. The Council consider that some plans and drawings are not sufficiently accurate or are difficult to interpret. The Council considers that use of digital plans and use of three-dimensional computer models should be submitted where appropriate. This would also help to support the Government's plan for a digital planning system.

It should be noted that it's important not to create unrealistic expectations about the ability to take enforcement action against minor deviations from the approved scheme

36. Do you agree that a specific reference to mansard roofs in relation to upward extensions in Chapter 11, paragraph 122e of the existing framework is helpful in encouraging LPAs to consider these as a means of increasing densification/creation of new homes? If no, how else might we achieve this objective?

No. Mansard roofs are simply one of a whole raft of Architectural devices which may or may not be appropriate within a landscape (or townscape) and which could achieve this objective. This is an issue for local design consideration and concerns both contextual distinctiveness as well as issues of beauty.

37. How do you think national policy on small scale nature interventions could be strengthened? For example, in relation to the use of artificial grass by developers in new development?

The Council would like to see national policy further strengthened by including wording that supports development that includes small scale nature interventions such as bat and bird boxes, bee and swift bricks and hedgehog highways. This is a matter that could be included in National DM Policies. It would be important to make clear that features such as bat and bird boxes, bee and swift bricks and hedgehog highways are included as permanent features within development, including being made from durable materials and located within the fabric of the buildings wherever possible, to ensure they provide long lasting benefits to nature and are not removed upon occupation.

The Council welcomes the Government's view on the use of artificial grass and considers national policy should also be amended to restrict the use of artificial grass within development, only permitting its use in very limited circumstances such as on sports pitches. This is in recognition of the impacts that artificial grass has on wildlife, increasing levels of plastic pollution, its contribution to the urban heat island effect and potential to increase surface water run-off in developments, all in comparison to natural lawns and grassland

38. Do you agree that this is the right approach making sure that the food production value of high value farm land is adequately weighted in the planning process, in addition to current references in the Framework on best most versatile agricultural land?

The Council strongly supports the approach of giving greater consideration to the relative value of agricultural land for food production when deciding which sites are appropriate for development, particularly in light of food security and building resilience to future crisis and shocks. It is recognised with the need to provide land for nitrates/phosphate/BNG projects there are competing demands on agricultural land, consideration needs to be given to the returns to land owners as some of these mitigation initiatives maybe more attractive to land owners than producing food.

39. What method or measure could provide a proportionate and effective means of undertaking a carbon impact assessment that would incorporate all measurable carbon demand created from plan-making and planning decisions?

For development proposals, current best practice (LETI et al) is to calculate carbon emissions from energy-use, using modelling using tools such as Passivhaus PHPP or CIBSE TM54 (for operational energy). This type of approach should be used for both planning and building regulations assessments of energy and carbon use in operation to reduce the need for multiple assessments (and because the SAP approach is known to be not fit for purpose for carbon assessment).

The forthcoming UK Net Zero Carbon Buildings Standard is aiming to provide an industry agreed approach for calculating embedded as well as operational carbon. Once developed it should be possible to adapt it into a simplified model to provide reasonable estimates for plan-making stage.

40. Do you have any views on how planning policy could support climate change adaptation further, specifically through the use of nature-based solutions that provide multi-functional benefits?

The Council suggests that national policy could support climate change adaptation further by requiring both major and minor development to incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. This is in recognition of the multi-functional benefits that SuDs provide and the cumulative difference/improvement that can be achieved if minor development also incorporated SuDs where possible in addition to the existing requirement on major development.

Furthermore, the requirement to incorporate SuDs within development (as stated in existing paragraph 171 in the NPPF) could also be strengthened to state that SuDs should be designed to be as natural as possible.

In addition, the Council also believes that national policy could include a requirement that in all cases surface water run-off rates from proposed development does not exceed existing run-off rates and for brownfield sites in particular, runoff rates are reduced where possible. This is in recognition of reducing flood risk and helping to reduce stormwater overflows water particularly in light of a changing climate.

Whilst existing paragraph 131 in the Framework refers to the important contribution that trees make to helping mitigation and adaptation to climate change, this could be further strengthened to include reference to helping to reduce the urban heat island effect in urban environments. This could also be extended to other habitats and forms of green infrastructure which also help to reduce the urban heat island effect. This is in recognition that with climate change, summers are expected to be hotter and drier further amplifying the urban heat island effect in our towns and cities.

The Council also considers national policy should support climate change mitigation further by including a requirement that all development should use sustainably sourced materials including promoting the use of recycled materials within development where possible. This is in order for development to help meet legally binding carbon reduction targets set by Government as well as protecting and enhancing the environment. New development should not use materials that contribute to deforestation or lead to environmental degradation and pollution.

41. Do you agree with the changes proposed to Paragraph 155 of the existing National Planning Policy Framework?

42. Do you agree with the changes proposed to Paragraph 158 of the existing National Planning Policy Framework?

(41-42) As far as they go, but notwithstanding references to future NPPF changes on this matter the continued lack of a NPPF section (or even an basic statement) addressing how plans and development proposals should be helping to achieve net zero carbon is disappointing and inconsistent with national zero carbon commitments. National policy still enables development that will need major retrofitting to achieve zero carbon in operation.

Part C of para 155 (157 as amended) should more explicitly encourage renewable energy installation such as PV in new developments.

43. Do you agree with the changes proposed to footnote 54 of the existing National Planning Policy Framework? Do you have any views on specific wording for new footnote 62?

The Council is concerned that the amended wording focuses on the use of Supplementary Planning Documents, when these are set to be removed through the future provisions. National policy should focus on the need to evidence wind opportunities during Local Plan preparation through the preparation of a 'Renewable Energy Capacity Study' to inform plan policy.

44. Do you agree with our proposed Paragraph 161 in the National Planning Policy Framework to give significant weight to proposals which allow the adaptation of existing buildings to improve their energy performance?

The Council agrees that significant weight should be given to the need to support energy efficiency and that this should be considered alongside the other considerations and policies within the Framework.

45. Do you agree with the proposed timeline for finalising local plans, minerals and waste plans and spatial development strategies being prepared under the current system? If no, what alternative timeline would you propose?

46. Do you agree with the proposed transitional arrangements for plans under the future system? If no, what alternative arrangements would you propose?

(45 and 46) For plans reaching reg 19 stage in the period after the updated NPPF is published and up to the currently proposed June 2025 submission cut off point, authorities with emerging plans (including neighbourhood plans) should be given the option to proceed to examination under the current or the revised NPPF, confirming which with PINs when an inspector is arranged and a submission date for examination is agreed.

The adoption of plans examined under transitional arrangements by December 2026 is not supported and may have unintended consequences. For plans submitted close to the transitional arrangements cut-off date the date of plan adoption will depend in part on PINs resourcing, and on the extent of post examination modifications that may be required. It is unnecessary to specify an adoption deadline as it risks significant abortive work and cost if a deadline is missed for reasons outside of LPA control, which may deter authorities from progressing. If a deadline was fixed in regulations it could needlessly induce legal challenge risks and other tactics by plan opponents to delay plans in progress.

47. Do you agree with the proposed timeline for preparing neighbourhood plans under the future system? If no, what alternative timeline would you propose?

The Council agrees with the proposed timeline for preparing Neighbourhood Plans.

48. Do you agree with the proposed transitional arrangements for supplementary planning documents? If no, what alternative arrangements would you propose?

The Council notes the proposed new arrangements for Supplementary Plans. However, further clarity is required to understand the process of adopting Supplementary Plans.

49. Do you agree with the suggested scope and principles for guiding National Development Management Policies?

The Council agrees in principle with the scope and principles for guiding National Development Management Policies where they relate to high level or 'generic' matters. For example, high level policies on amenity impacts, secured internal space standards, presumption in favour of sustainable development etc. are often very similar across most if not all Local Plans. It will be important that National Development Management Policies are clear to avoid ambiguities, so that policies are applied consistently across the country.

50. What other principles, if any, do you believe should inform the scope of National Development Management Policies?

As referenced in the answer to question 49, the overriding principle should be the ability of the new NDMPs to avoid misinterpretation between LPAs.

51. Do you agree that selective additions should be considered for proposals to complement existing national policies for guiding decisions?

The Council agrees that selective additions would complement existing national policies for guiding decisions but disagrees with those in relation to housing in town centres and built-up areas as these types of areas across the country are so diverse. It would be less controversial to produce 'default' national policies and to leave open to LPAs the option to vary them where warranted by local circumstances, which would need to be evidenced and would be scrutinised at examination stage.

52. Are there other issues which apply across all or most of England that you think should be considered as possible options for National Development Management Policies?

The Council considers that the following are examples of other issues which would apply to all or most of England and should be considered as possible options for National Development Management Policies: internal space standards, surface water drainage and flood risk, protection of heritage assets and policies to support delivering resilient and adaptation to climate change. In addition, in relation to question 56, measures to improve safety for women, girls and other vulnerable groups in society could be the consideration of a NDMP.

53. What, if any, planning policies do you think could be included in a new framework to help achieve the twelve levelling up missions in the Levelling Up White Paper?

The Council considers that there are some areas where additional planning policies could be included in a new framework to help achieve the twelve Levelling Up missions in the Levelling Up White Paper. For example, the Government could re-consider the role of and use of Permitted Development Rights particularly in town and city centres, as this has been a key driver behind the loss of employment space and retail units in city and town centres which impacts the prosperity of the UK's high streets and people's engagement in their local cultures and community. The Council also considers policies on specifying quantity standards for open space in a new framework would help achieve the levelling up objective of raising life expectancy, improving wellbeing and generally rising a sense of 'pride of place' through having development that has access to open space and nature.

54. How do you think that the framework could better support development that will drive economic growth and productivity in every part of the country, in support of the Levelling Up agenda?

It would be helpful to include in the NPPF a high level positive strategy for growth. There should be a better alignment between the provision of homes (and other development) with sustainable opportunities to deliver growth in a manner that would help address the levelling up agenda. This includes making best use of associated major infrastructure spending commitments such as HS2. As a minimum it would be helpful to update the NPPG to specifically identify levelling up as one of the reasons to do more than the standard method starting point, where it is sustainable to do so.

55. Do you think that the government could go further in national policy, to increase development on brownfield land within city and town centres, with a view to facilitating gentle densification of our urban cores?

Any national policy would need to go further than just city and town centres. Abnormal costs, soundness deliverability tests and delivery lead in times may lead developers and councils alike to easier greenfield options in local plan allocation work. The Government needs to consider a range of national policies to increase delivery on brownfield sites including tax incentives and land ownership challenges, the planning system is only one of the policy tools available to deliver development on brownfield sites. A more beneficial fiscal regime could be introduced that would facilitate gentle densification on brownfield sites as advantageously as greenfield development, in terms of viability.

56. Do you think that the government should bring forward proposals to update the framework as part of next year's wider review to place more emphasis on making sure that women, girls and other vulnerable groups in society feel safe in our public spaces, including for example policies on lighting/street lighting?

The Council would welcome any proposals which would lead to improved safety outcomes for vulnerable members of our communities. An emphasis on this in the future Framework would continue to highlight the difficulties encountered by these groups and any policies which would address these issues would seem to only be a positive. Safety for vulnerable groups could be addressed through the new National Development Management Policies.

57. Are there any specific approaches or examples of best practice which you think we should consider to improve the way that national planning policy is presented and accessed?

58. We continue to keep the impacts of these proposals under review and would be grateful for your comments on any potential impacts that might arise under the Public Sector Equality Duty as a result of the proposals in this document.

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TOTTON COMMUNITY ENGAGEMENT

1. RECOMMENDATION

1.1 It is recommended that the Cabinet:

- a) Consider the content of the report and support progressing delivery of the projects that have been identified in the report as 'quick wins';
- b) Support in principle the 6 Design Principles which set the Vision for Totton and agree that further consultation takes place to seek views from key stakeholders such as the Town Council, County Council and Neighbourhood Plan Team; and
- c) Support more detailed technical work as set out in the report to progress a Regeneration Plan for Totton which will also inform future Local Plan work

2. PURPOSE OF THIS REPORT

2.1 The purpose of this report is to;

- Update Cabinet on the findings of the community engagement work
- Identify some early projects that could be delivered
- Identify the next steps in the work
- Confirm the relationship between this work and future work on the Local Plan Review.

3. INTRODUCTION

- 3.1 In January 2021 NFDC together with the County Council and the NPA launched the Vision for Totton and the Waterside. The document sets out the shared vision of the opportunity across the whole of Totton and the Waterside, the collective assessment of the cumulative impact of the development aspirations, together with the partners understanding of the total infrastructure needed to support and enable the growth plans for the area, to be delivered in a way compatible with the shared vision.
- 3.2 The Vision acknowledge the importance role of Totton town centre and how it needed improvements to better fulfil its role as the key urban centre for the Waterside and its communities both now and as those communities grow.
- 3.3 The Cabinet report of May 2021 titled 'The Local Plan Review Part Two and other supporting work' identified other work areas which will complement work on the Local Plan, and/or support and enable the sustainable delivery of the adopted LPP1 sites and strategy. It identified work relating to Totton Town Centre to deliver a Regeneration Plan to reflect the ambition of the Totton and Waterside Vision document.
- 3.4 As the first stage of the Totton Regeneration work the Council commissioned Planning, Urban Design and Community Engagement consultancy Practice to undertake a community engagement across the Summer of 2022.

4. COMMUNITY ENGAGEMENT

- 4.1 This report captures the results of the community engagement exercise that explored ways in which Totton town centre could be improved. Suggestions include changes to the events, activities, and retail offer so the town centre could better act as a destination for the local area all with the backdrop that the nearby Waterside area will accommodate substantial growth in the coming decade.

- 4.2 The study team's community engagement process informed two levels of proposed interventions. These are described as quick wins and future strategic areas to investigate. The quick wins comprise community-led initiatives and meanwhile use projects that can be put in place relatively quickly.
- 4.3 Four engagement techniques were used to enable the project team to connect with a wide range of people and extrapolate ideas from people in different ways. The engagement was also organised around the different and distinct geographies of the town centre area;
- Whole Town Centre – to establish what people think of Totton and the community as a whole
 - New Town Centre area- this includes the Precinct and Commercial Road area and Junction Road as far as the railway
 - Old Town Area – focusing on Rumbridge Street and Junction Road up to the railway tracks
 - Testvale Park – this includes the collection of public sector services in the campus environment
- 4.4 The engagement was carried out through;
- a series of street audio recording interviews
 - Zoom discussions with 24 people and /or organisations to participate in a series of online stakeholder meetings
 - Face to face meetings were also held with representatives from the local history group, the Totton Community Centre and the Men's Shed Group
 - Totton and Eling Neighbourhood Development Plan team
 - Survey on a Bespoke Website
 - On street discussion Boards.
- 4.5 A total of 874 responses were received from around 250 different contributors. The drawings contained at Appendix 1 represent the main ideas and comments gathered through the various street consultation exercise. The stakeholder meetings echoed much of what had already been said but there were two positions that emerged from these discussions.
- 4.6 The first prospective was that all efforts must be made to keep the cars moving within the town. The roads should be running free to minimise vehicle congestion. There were a number of ideas about how to keep cars moving and reduce the perceived congestion some more radical than others. The second prospective was to redistribute road space for non car travel. This would include reconfiguring road space to improve connectivity and encourage walking and cycling in line with national policy.

Key themes that emerged from the Engagement exercise - setting the Vision for Totton

- 4.7 Seven key themes emerged from the engagement phase:

Theme 1

Cars, traffic, and congestion are a real source of irritation to people. People complained about the traffic on the roads, the roads bisecting the town, the difficulty crossing the roads, the pedestrian guard rails that deliberately prevent people crossing the streets in locations that are desirable. They also complained about the railway and the fact that when the level crossing is closed, vehicle congestion builds up. It is a point of interest that when people talked about traffic and congestion they expressed their concerns from the pedestrian experience, not that as a car driver. This is interesting as it suggests the people that were engaged saw themselves as walkers' who wanted a better pedestrian experience.

Theme 2

People really liked Testvale Park and the Civic Centre area. These are key places in Totton town centre, and they are essential to the character of the town centre. That said, it is the green spaces that people identify with in these areas, rather than the buildings.

Theme 3

There is a need to upgrade the Civic Campus to perhaps include better access to outdoor space and area to play for children. Several people noted that the current configuration of the civic buildings – e.g. library, Community Centre, the Three Score Club (which is privately owned) and the Health Centre could benefit from being rationalised and made more legible, while maintaining the sense of openness and green space offered by the current campus style arrangement.

Theme 4

People were frustrated with the Precinct, saying it was shabby and run-down. Participants often blamed the landowner for not keeping the place maintained properly and felt the place was being allowed to deteriorate. The Precinct is the commercial heart of the town centre, but it feels tatty, unloved and people want to see visual and aesthetic improvements.

Theme 5

There is a keen sense of community in Totton. It is a friendly place and people refer to it as a feeling like a village and enjoy the village atmosphere. People use Totton in multiple ways – as a local high street, as town centre and as social space.

Theme 6

Totton suffers from a series of disconnected streets with severance issues caused by wide, fast roads and the railway. This interferes with easy movement around and through the town.

Theme 7

The current low-density footprint of the town centre allows for intensification but only if the current disconnects due to heavy road infrastructure, the railway and poor quality walking routes can be successfully addressed.

Design Principles

- 4.8 The collective results of the engagement phase have been translated into a series of potential design principles. There will now need to be wider engagement with key partners such as major land owners, the Town Council and the County Council before these principles can be agreed. The Design Principles identified are:

The Modern Market Town

Totton has the potential to be a really lovely place to live and visit. It combines certain urban qualities (such as the Civic Centre area) and identifies as a town, yet people love the local community “village feel” and easy access to nearby wild spaces. In many respects, this mix of a range of local services set within countryside is the essence of the English market town. This design principle emerged through engagement when it was found that some viewed Totton as part of Southampton, and others as part of the New Forest. Others then viewed Totton as central to these, with an identity of neither being a town nor village. Instead, it is

proposed that Totton strives to become a “modern market town” — one that does not try to replicate the picture postcard qualities of some other New Forest towns but is bold and modern with its architecture, its attitudes towards sustainability and access, has strong green credentials through links to landscape and urban biodiversity and appeals to a local audience in terms of skills, employment, and urban living.

Independence

People want a town centre with a greater range of independent shops. They do not want to be another Southampton but at the same time, Totton lacks basic comparison retail, such as clothes and shoe shops. Linking to the idea of principle of the “modern market town”, such services would be an expected feature of a revitalised Totton town centre. People spoke of independent business found small towns in the New Forest, such as Romsey, Hythe, Lyndhurst. This desired land use mix related to the identity of Totton, where many feel it has an independent spirit or character, but this is not reflected in the range of shops and services. Any new development in the town centre that increases commercial or retail floorspace needs to specifically think about how to accommodate and attract independent businesses.

Cohesive Community

Community was a key topic that emerged during the engagement phase. Some felt a sense of community was lacking in Totton, while others said there were areas with a strong community feel and this could be revealed and expanded to the wider town centre area. One way of creating a strong sense of community would be through the creation of more civic spaces in the town centre – both hard landscaped space and green spaces. Creating walkable links between these locations will be important to establish a network of spaces. People spoke highly of existing events that are regularly organised, of the Three Score Club and the Community Centre adjacent to Testvale Park. An enhanced programme of events and activities to animate these spaces will be a key part of fostering a more cohesive community.

Connected & Permeable

Words that emerged during the engagement phase to describe Totton town centre included disconnected, fragmented, and disjointed. People said they often visited one bit of the town centre at a time, with few linked trips. For example, the Precinct and Rumbridge Street were seen as separate, disconnected entities, isolated from each other, and not part of one joined-up town centre. The main causes of this fragmentation are the A336/A36 Commercial Road and the railway level-crossing, which people perceive as “hard barriers” to their journey. However, while this is a genuine issue, the severance is more psychological. The walking distance is short between the north and south of the town even if it feels much longer. This is an area that will need to be explored further supported by further technical work.

Links to Landscape

Though Totton is a relatively urban area, it was widely recognised that the town centre lies in close proximity to green and blue infrastructure and wild areas, such as the Lower Test Valley Nature Reserve to the north and Eling and Southampton Water to the south. These natural features should make it a very attractive place for leisure and health. This design principle emerged as people identified that one thing that they loved living in Totton was living in close proximity to nature and green spaces, whether that be the New Forest, Eling, or Test Valley. However, many said that these spaces and routes just outside the town centre were not well known, and not signposted. If more people were made aware of these routes, it may encourage people to get active for leisure, but also to walk into town to do errands if they are aware of a more attractive route than their usual route that may just encourage them to drive.

Flexible & Adaptable

The hard infrastructure of roads and rail that have blighted the town centre are an example of inflexible and rigid urban interventions. They create hard edges and affect the land either side in ways that make it difficult to reinvent, repurpose and remodel for new uses. In a similar way, the campus environment of the Civic Centre area has an irregular and scatted layout of pavilion buildings that fail to frame public space in a safe and legible way. This leads to an inflexibility in the way this area can adapt to changing economic, social, and environmental demands.

5. QUICK WINS

- 5.1 Many of those that engaged in the work said that more community events could improve Totton. Consideration needs to be given to where these events could take place within the town centre, potentially within existing car parks or the park given the temporary nature of the events. These events could include markets but also could consider play activities.
- 5.2 Whilst there were differing views on the role of the car within Totton town centre there was overriding concern about the impact of traffic on the sense of place. Within and alongside this engagement work there is a recognised need for better signage with walking within the town and for route maps to be produced. A further initiative could be a Totton Walking Festival which could support highlighting existing routes to those less familiar with the town and the routes to the surrounding countryside. Residents could also be encouraged to map the route from their home to the festival. This initiative would tie in with the work that has been piloted in New Milton to identify Green Infrastructure projects and work on the Greenway Routes.
- 5.3 A more detailed piece of work could be done through the Environmental Design team to identify opportunities to introduce 'play on the way' features similar to those included within a number of new development across the district. There may also be opportunities across the town centre for small areas of urban greening which could form part of this work.
- 5.4 A more detailed examination of the layout and design of Testvale Park and the surrounding area should be progressed with the Town Council to identify how this area could be enhanced to contribute to the sense of community and place within the town centre.

6. FUTURE WORK

- 6.1 This initial Community Engagement work has set a clear ambition from the community of Totton to make improvements to the town centre. It is important that communication and engagement continues. There is clear opportunity across the immediate and wider town centre for redevelopment or intensification to continue to support a mix of uses within the town centre. There are also clear opportunities to shift the town street structure towards a greener economy and more people focused town.
- 6.2 Whilst some initial work was done immediately before the pandemic around future needs of public bodies that currently occupy the Civic Quarter more detailed work is needed to understand the future shape of this area within the overall context of the town centre and surrounding area. A more detailed Master planning workstream will be commissioned during 2023 bring together specialist advice on urban design, transport, viability, retail and employment need together with advice on market demand and deliverability.
- 6.3 Whilst this is a separate workstream from the Local Plan Review it will inform the Local Plan Review. Land within the Town Centre identified for redevelopment may be allocated within a future Local Plan. It is therefore important that future work is detailed enough to be used as evidence to support the Local Plan.

7. CONCLUSIONS

- 7.1 The level of response to this community engagement work demonstrated the passion and strength of feeling the community has for Totton. The work has identified a number of quick wins that can now be worked up into projects. Members will recall that the UK Shared Prosperity Fund allocated £220,000 for Town Centre Improvements with the schemes proposed including activities such as one-off markets, healthy eating demonstrations and cultural events with early pilots in Totton.
- 7.2 The engagement work has also identified more strategic issues that will inform the next stage of more detailed technical work. Feedback from the community of Totton has led to 7 potential Design Principles that would set the vision for Totton which now need to be tested with partners.

8. FINANCIAL IMPLICATIONS

- 8.1 The suggested 'quick wins' will be funded through the UKSP Fund.
- 8.2 The proposed General Fund revenue budget for 2023/24 has included a new annual regeneration working budget of £50,000 which will support the more detailed work involved in the next stages. Although no sums specific to regeneration projects are currently included in the Council's Capital Programme, the Medium-Term Financial Plan has indicated that Capital resources will likely be required over the more medium-long term as larger place shaping regeneration projects are developed and brought forward for due consideration.
- 8.2 There is also budget for a Town Centre Regeneration officer. The initial recruitment cycle for this post was not successful, with a clearer programme of work through the UKSP Fund officers are optimistic that a further recruitment exercise maybe successful.

9. CRIME & DISORDER IMPLICATIONS

- 9.1 The 'quick wins' identified will improve the sense of pride and community cohesion within Totton which has been shown to reduce crime within area. Longer term initiatives will also create a safe environment and design out crime.

10. ENVIRONMENTAL IMPLICATIONS

- 10.1 The impact on more strategic changes to the town centre will need to be fully tested to understand their impact on the environment. The 'quick wins' are designed to encourage walking reducing the impact of the car journeys on the environment and making a positive contribution to the Climate and Nature Emergency.

11. EQUALITY & DIVERSITY IMPLICATIONS

- 11.1 The findings of the community engagement work will inform short, medium and long-term change within Totton town centre helping to create a place that is more inclusive.

12. PORTFOLIO HOLDER COMMENTS

- 12.1 The success and future of Totton as the largest centre at the heart of the Waterside area is important to the district as a whole, especially for the people who live and work there. The engagement study clearly identifies community ambitions for Totton to be a modern market town, and this ambition should be supported by following through with the recommended next steps to deliver both quick wins and developing a strategy for longer term regeneration. Whilst

this paper focuses on Totton various work is going on in other towns and communities with a view to evolving those towns in the future.

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Background Papers:

None

Appendix A



Testvale Park

This drawing represents the main ideas and comments for the Testvale Park area as gathered through the various street consultation exercises to date



New Totton Town Centre area

This drawing represents the main ideas and comments for the New Totton area as gathered through the various street consultation exercises to date



Rumbridge Street

This drawing represents the main ideas and comments for the Rumbridge Street area as gathered through the various street consultation exercises to date.

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CABINET – 1 MARCH 2023

PORTFOLIO: PLANNING, REGENERATION AND
INFRASTRUCTURE

DRAFT SUPPLEMENTARY PLANNING DOCUMENT: PLANNING FOR CLIMATE CHANGE

1. RECOMMENDATIONS

- 1.1 That the Cabinet agree that the draft Supplementary Planning Document (SPD) “Planning for Climate Change” be published for a six-week public consultation in May 2023.
- 1.2 That any final editorial changes to the draft document (attached in Appendix 1 to this report) prior to publication be agreed by the Executive Head for Planning, Regeneration, and the Economy in consultation with the Portfolio Holder for Planning, Regeneration, and Infrastructure.

2. PURPOSE AND OBJECTIVES

- 2.1 The purpose of this report is to seek approval to publish the draft supplementary planning document (SPD) Planning for Climate Change for public consultation.
- 2.2 The SPD will be used in the determination of planning applications for the construction of new homes, commercial and community buildings. The SPD provides guidance on the interpretation and implementation of policies in the adopted Local Plan 2016-2036 Part 1: Planning Strategy. In particular, parts of Policies STR1: Achieving sustainable development and ENV3: Design quality and local distinctiveness. Taken together these policies require that new development is future-proofed for climate change and incorporates design measures that improve resource efficiency, climate change resilience and reduce environmental impacts.
- 2.3 The key objectives of this SPD are to encourage the development industry to take all reasonable steps to minimise expected carbon emissions when designing and constructing new buildings, and to make new development more sustainable and climate change adapted. A ‘future homes now’ commitment not to install gas or oil-fired boilers in new development is a priority objective.
- 2.4 More detailed climate change policies and standards will continue to be developed through future Local Plan Reviews and/or as national policy evolves.

3. NATIONAL AND CORPORATE CONTEXT

- 3.1 On 11 October 2021 New Forest District Council declared a Climate and Nature Emergency. The Climate and Nature Emergency declaration reflects the Climate Change Act 2008 (as amended 2019), which commits the UK government by law to reducing greenhouse gas emissions by at least 100% of 1990 levels by 2050. In 2021 the UK committed a ‘world leading’ 78% reduction target by 2035, set out in the Climate Change Committee’s Sixth Carbon Budget.
- 3.2 The Planning for Climate Change SPD sits in the context of the National Planning Policy Framework (NPPF 2021). Pursuant to the Climate Change Act, this sets out that the overarching environmental objectives of the planning system include ‘using natural

resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy¹.

- 3.3 This SPD is part of the wider set of actions previously agreed by the Council to deliver on the Declaration, outlined in a Climate and Nature Emergency Action Plan². It also responds to the Community Matters Corporate Plan 2020-2024³ commitment to 'ensuring sustainability is at the centre of our decisions to preserve resources and the environment for future generations'.
- 3.4 The SPD focuses on new development. Taking new homes as an example, a representative 3-bed terraced house built in the last decade consumes 124 KWh of energy per square meter per annum, of which 95 KWh as gas, and emits about 2 tonnes of CO₂ per annum from gas consumption alone (mostly for water and space heating)⁴. Best practice energy efficient homes consume around 15 KWh/m²/year for heating, do not use gas (or oil) boilers, and are carbon neutral in operation if their electricity is provided from renewable or nuclear sources.
- 3.5 To put a dwelling figure in context, of the New Forest district carbon dioxide emissions that are within the scope of influence of Local Authorities, 25% arise from natural gas use - 20% from domestic heating and 5% from commercial and other uses⁵.
- 3.6 The SPD complements the Council's Greener Housing Strategy⁶ which addresses decarbonising the Council's own affordable house building programme and affordable housing stock, and working with private owners and landlords to help decarbonise existing homes. As part of the Greener Housing Strategy it is intended that new affordable housing schemes designed and built by the Council will be constructed to the draft Future Homes standard⁷.

4. THE PLANNING FOR CLIMATE CHANGE SPD DOCUMENT

- 4.1 The draft SPD document is attached at Appendix 1. The main sections and their contents are as follows.
- 4.2 Part A, the introduction, briefly sets out the implications of climate change locally, defines key terms and provides the international and national policy context. It also summarises the costs and benefits to developers and occupiers of achieving zero carbon development.
- 4.3 Part B sets out information requirements⁸ for planning applications, supported by diagram summaries. The aim is to ensure that Local Plan requirements are addressed by identifying and encouraging developers to follow best practice, challenging

¹ NPPF paragraph 8

² [Climate change - New Forest District Council](#)

³ [Corporate_plan_17.11.21.pdf \(newforest.gov.uk\)](#)

⁴ [Energy consumption in new domestic buildings 2015 to 2017](#), BEIS 2019, and [Greenhouse gas reporting: conversion factors](#), BEIS 2021. Based on an EPC B-rated new build home with a gas boiler in 2017, sample size 93,967 homes.

⁵ [UK local authority and regional greenhouse gas emissions national statistics](#), 2020 data (ONS 2022)

⁶ [Greener Housing Strategy, Item 11, Cabinet report 6 July 2022](#)

⁷ The future Homes Standard sets out envisaged changes to the Building Regulations proposed to come into effect in 2025, including 75-80% lower CO₂ emissions than 2020 standards, and a proposed ban on the installation of gas boilers in new homes.

⁸ Commensurate changes are proposed to be made to the list of Local Information Requirements, information applicants must provide when submitting a planning application. These changes will be reported and consulted on separately.

'business as usual' in the construction sector. Recognising that it will not always be possible to achieve some best practice standards, developers are asked to make best endeavours to achieve them and to ensure that new buildings are at least future proofed for convenient future heat pump installation. If best practice cannot be achieved, developers are asked to explain and justify the steps they are able to take decarbonise development and to mitigate and adapt to climate change effects.

- 4.4 Part C provides best practice guidance on climate change mitigation and carbon reductions for new development, in particular for new housing. Parts of this section are reproduced or adapted from The Net Zero Carbon Toolkit (2021)⁹. Part C also provides best practice guidance on climate change adaptation, for example on sustainable drainage to manage flood risk, drought resilience and water efficiency.
- 4.5 The appendices provide supporting information.
- 4.6 The remaining technical sections of the original Net Zero Carbon Toolkit document are proposed to be published separately as a companion reference document supporting this SPD.

5. NEXT STEPS

- 5.1 After any final editing the draft SPD will be published for at least 6 weeks public consultation in May 2023. It is envisaged that the results of the consultation and the SPD in final form (taking into account consultation feedback) would be reported to the Cabinet and to the Council for formal adoption in the late summer of 2023.

6. FINANCIAL IMPLICATIONS

- 6.1 There are no direct financial implications for the Council. However, development viability may be affected as the achievement of more energy efficient and environmentally sustainable buildings may impact on development costs whilst supply chains and processes transition to higher standards and expectations. Equally development with lower energy running costs and improved environmental credentials is likely to be more attractive to occupiers and may command a price premium.

7. ENVIRONMENTAL IMPLICATIONS

- 7.1 The draft Supplementary Planning Document sets out proposals which aim to ensure that all new development:
 - Reduces its impact on the environment by reducing greenhouse gas emissions that contribute to climate change; and
 - Is resilient to the projected future effects of climate change on the environment.

8. CRIME & DISORDER, EQUALITY & DIVERSITY AND DATA PROTECTION IMPLICATIONS

- 8.1 There are none.

⁹ Authors: Levitt Bernstein, Elementa, Passivhaus Trust and Etude commissioned by West Oxfordshire, Cotswold and Forest of Dean District Councils, funded by the LGA Housing Advisers Programme, licensed under Creative Commons Licence 4.0 International (CC BY-NC-SA 4.0)

9. PORTFOLIO HOLDER COMMENTS

- 9.1 The Climate Change SPD has an important role to play supporting the implementation of climate change policies in the adopted Local Plan, and it is an important part of the Council's Climate Emergency action plan. I encourage the community and development industry to respond to the consultation.

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Background Papers:

Published documents



Planning for climate change

Supplementary Planning Document (SPD)

DRAFT for Cabinet

1 March 2023

New Forest District (outside the National Park)



Acknowledgements

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A summary of the changes made is available at (*Link to NFDC Webpage: forthcoming*)

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Technical guidance sections from the [Net Zero Carbon Toolkit \(NZCT\)](#) to be published as a companion document to the draft SPD

- Construction methods and quality (NZCT Page 18)
- Airtightness for new build ((NZCT Page 19)
- Ventilation for a new build (NZCT Page 20)
- Low carbon heat: design, commissioning and operation of heat pumps (NZCT Pages 22 and 23)
- Water efficiency (NZCT Page 25)
- Which heat pump is best for me? (NZCT Page 24)
- Solar PV panels for houses (NZCT Page 26)
- Solar PV panels for blocks of flats (NZCT Page 27)
- Smart controls and demand flexibility (NZCT Page 28)
- Retrofitting existing homes (NZCT Pages 38 – 66)





Part A: Introduction



Purpose, objectives and structure

1. The purpose of the Supplementary Planning Guidance (SPG) is to provide guidance for the planning policies contained in [Local Plan Part One 2016-2036: Planning Strategy \(2020\)](#), Current and future flood risks were assessed in detail. Development locations with access to opportunities, facilities and services were prioritised, to help reduce the need to travel (to the extent practicable in a predominantly rural area).
2. The Supplementary Planning Document (SPD) clarifies how developers should address climate change in planning applications, in order to meet Local Plan requirements, in particular the two policies in the inset box below (other climate change related policies are listed in Appendix 1).

Policy STR1: Achieving sustainable development

All new development will be expected to make a positive social, economic and environmental contribution to community and business life in the Plan Area by: ...

vi. Ensuring that new development is adaptable to the future needs of occupiers and future-proofed for climate change and innovations in transport and communications technology.

Policy ENV3: Design quality and local distinctiveness

... New development will be required to: ...

v. Incorporate design measures that improve resource efficiency and climate change resilience and reduce environmental impacts wherever they are appropriate and capable of being effective...

3. It does so by setting out best practice approaches or standards that developers are encouraged to target or adopt, to
 - take all practicable steps to decarbonise the running of buildings;
 - to meaningfully reduce embodied carbon in construction; and
 - to ensure development is climate change adapted.The aim is to ensure that designs are climate change optimised before planning applications are submitted.
4. Whilst it is essential to make meaningful carbon savings now, it will not always be possible to achieve best practice standards for reducing carbon emissions in one step. Where it is not yet feasible for a building to be zero carbon in operation, an important second objective of this SPD is for all such development to be **zero carbon ready**, capable of running without carbon emissions.
5. To be 'zero carbon ready' requires that any additional steps needed to achieve zero carbon running are identified and enabled at design and build stage, when it is most cost efficient to do so. This will help to minimise the carbon impact, cost and inconvenience of future upgrading.



SPD structure

6. **Part A** (page 5) briefly sets out the implications of climate change locally, defines key terms and provides the international and national policy context. It also summarises the costs and benefits to developers and occupiers of achieving zero carbon development
7. **Part B** (page **Error! Bookmark not defined.**) sets out the information required to accompany planning applications.
8. Drawing on the Net Zero Carbon Toolkit, **Part C** (page **Error! Bookmark not defined.**) provides best practice guidance for climate change mitigation and carbon reductions for new development, in particular for new housing. It also provides guidance on climate change adaptation.
9. The appendices (page 43) provide supporting information. The technical sections of the Net Zero Carbon Toolkit e.g., on building products and processes are published separately as a companion reference document supporting this SPD.

Climate and Nature Emergency

10. On 11 October 2021 New Forest District Council declared a Climate and Nature Emergency¹. This SPD is part of the wider set of actions by the Council to deliver on the Declaration, outlined in a **Climate and Nature Emergency Action Plan**².
11. This SPD complements the Council's **Greener Housing Strategy**³ which focuses on decarbonising the Council's own affordable house building programme and affordable housing stock. The Strategy also commits the Council to working with private owners and landlords to help decarbonise existing private homes.

CO₂, zero carbon and climate change effects

12. Climate change is widely accepted to be caused by increased greenhouse gases in the atmosphere. Two broad types of response to climate change are required, defined¹ as follows:
 - **Climate change mitigation:** Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.
 - **Climate change adaptation:** Adjustments made to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities.

Carbon emissions from development

13. Energy is consumed and carbon is emitted at all stages of the whole-life cycle of a development.
14. **Embodied carbon** is emitted from energy consumed during construction, including the production and transportation of building materials - processes developers have some ability to control or influence. Thereafter embodied carbon also arises from periodic maintenance and ultimately from building demolition and waste disposal processes (net of any carbon savings from materials that can be recycled and any energy that can be recovered from residual waste).
15. **Operational carbon** is emitted over time from the energy consumed during the occupation and use of the building, in two categories:

¹ Source: NPPF glossary



- **Regulated emissions** from energy used to run the building, including lighting, heating, cooling/ventilation and hot water - so known because energy efficiency and carbon standards in these areas are controlled by the Building Regulations.
- **Unregulated emissions** are the remaining emissions from user behaviour, the other appliances and devices occupiers choose to fit or plug in.

Policy context

International

16. In 2018, the Intergovernmental Panel on Climate Change (IPCC) showed the world there would be only 12 years (to 2030) to prevent irreversible catastrophic damage from a changing climate. Any temperature increase greater than 1.5°C above pre-industrial levels would trigger far worse effects than previously thought, in terms of drought, flood, poverty for many people, and catastrophic biodiversity loss.



Figure 1: IPCC and UN climate change documents front covers

National legislation

17. The **Climate Change Act** 2008 (as amended 2019) legally commits the UK government to achieving net zero carbon emissions by 2050. In 2021 the UK Climate Change Committee's Sixth Carbon Budget² committed to a 'world leading' 78% reduction carbon target by 2035, relative to 1990 levels.
18. The **Environment Act** 2021 requires the Secretary of State to introduce legally binding environmental targets on a range of matters including air quality, resource efficiency and waste reduction, published in December 2022³.

National planning guidance

19. The **National Planning Policy Framework** (NPPF 2021) sets out that the overarching environmental objectives of the planning system include 'using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy'⁷.

² Sixth Carbon Budget: <https://www.theccc.org.uk/publication/sixth-carbon-budget/>

³ [Environmental targets consultation summary of responses and government response \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/101423/environmental-targets-consultation-summary-of-responses-and-government-response.pdf)



20. The NPPF para 152 states that:

'The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure'.

21. The NPPF para 154 states that:

'new development should be planned for in ways that: (a) avoid increased vulnerability to the range of impacts arising from climate change... (b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design...'

22. The National Planning Practice Guidance section on [Flood risk and coastal change](#) was significantly updated in August 2022. The NPPF and NPPG now comprehensively address how developments should avoid, or if necessary mitigate or adapt to, all forms of flood risk, including predicted climate change effects.

23. The [National Design Guide](#) (MHCLG 2021) outlines and illustrates the Government's priorities for well-designed places. It states that well-designed places and buildings conserve natural and other resources including buildings, land, water, energy and materials. Their design responds to the impacts of climate change by being energy efficient and minimising carbon emissions to meet net zero targets⁴.

Building Regulation

24. The Building Regulations regulate the 'operational' energy used to run buildings and the carbon emissions arising (Approved Document L: Conservation of fuel and power, as updated 2022). The following Approved Documents are also relevant to how buildings adapt to or mitigate climate change.

- Approved Document F: Ventilation
- Approved Document O: Overheating
- Approved Document S: Infrastructure for the charging of electric vehicles.

25. In 2019-2021 the government consulted on a **Future Homes Standard** and **Future Buildings Standard**, proposals to amend the Building Regulations in 2025. The proposals would reduce regulated operational carbon emissions by 75 and 80% compared with 2019 standards, including banning fossil fuel boilers in new homes from 2025.

Benefits and costs of Net Zero carbon development

26. There is a cost to achieving net zero as a society. For some sectors it will require technological innovation and investments in research and development. New buildings are comparatively less challenging in terms of net zero in operation. Technologies, techniques and processes required to run buildings without adding to carbon emissions are already available.

⁴ [National Model Design Code, Part 2: Guidance notes](#), 'Resources' section.



27. Lowering the embodied carbon of constructing new buildings will be more challenging and requires both material and procurement innovations. However, this does not have to lead to a significant cost premium either.

Buildings produce a lot of carbon – and are expensive to run

28. It is clear that a Net Zero UK will require a significant reduction in energy use and carbon emissions from all buildings and, in particular, homes. Even today, most new homes are being fitted with gas boilers and these will continue to emit carbon and also to degrade local air quality during their operational life.

Britain has not made sufficient progress on this

29. Despite rapid decarbonisation in many other sectors, the energy efficiency of new homes has remained almost constant over the last ten years. The rate of improvement stalled following the withdrawal of the Zero Carbon Homes target in 2016.

30. Interim improvements to the Building Regulations from 2022 will help (Part L 2021), but there is a need to do much better than the ‘business as usual’ practice of minimum regulatory compliance in the construction sector.

Heating: an important energy demand which can be reduced

31. Space heating during the winter months accounts for around 65% of the total energy demand in a new home. Space heating demand is an excellent proxy for the fabric efficiency of the building, which is why it is important to concentrate on a ‘fabric first’ approach.

A 2% - 6% cost premium for net zero carbon in operation

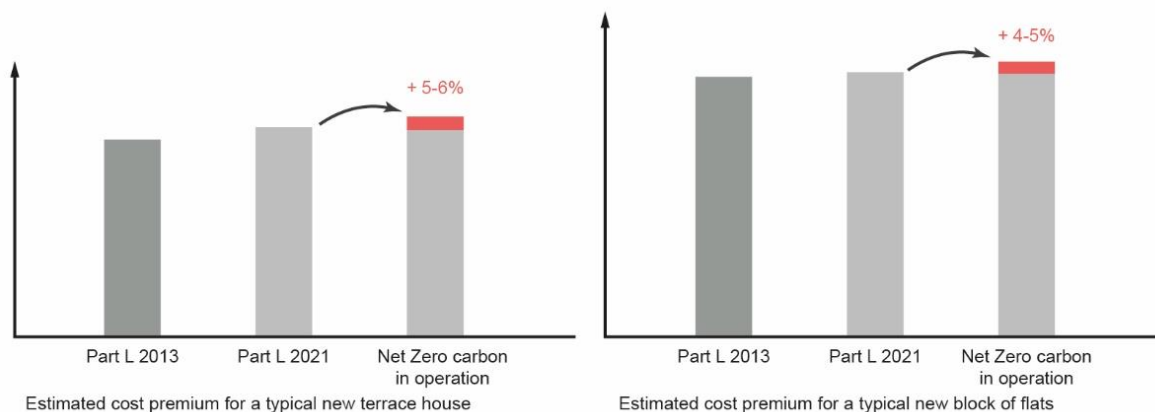


Figure 2: Estimated cost premium for a typical new terrace house, and Estimates cost premium for a typical new block of flats

32. The dwelling construction cost premium for delivering a new Net Zero carbon home has been estimated to be approximately 2% to 6% above a Part L 2021 compliant equivalent⁵. It will be a smaller percentage of final house sales prices,

⁵ Recent evidence produced for Winchester and Cornwall Councils support this estimate. [Technical evidence based for Policy SEC1 – new housing](#) (Etude, Currie & Brown, July 2021). [Net Zero Carbon Targets, Evidence Base for Winchester City Council](#) (Elementa, Etude, Currie & Brown, Sept 2022).



which would additionally reflect the cost of land and any other facilities, community benefits or infrastructure provided.

Potential to drive down net zero costs

33. A significant advantage in committing to net zero new homes is that it is a sustainable standard for the future. It offers significant opportunities for developers, clients and contractors to reduce their additional costs over time by improving processes (e.g. airtightness) or contributing to driving down the cost of key technologies. Whilst inflation is currently high overall the general trend has been a significant reduction in the cost of solar PVs in the last ten years. Other reductions, albeit smaller, are expected for heat pumps and MVHR.

UK homebuyers are prepared to pay a green premium

34. Slightly higher build costs will not necessarily affect development viability. Allowance should be made for cost recovery from buyers prepared to pay more for a home in return for lower energy bills. A recent survey⁶ of 2,300 buyers, agents and mortgage brokers found that buyers are already prepared to pay a 9.4% premium for previously owned homes that have been energy efficiency retrofitted, and 15.5% more for a home that meets high energy efficiency standards.

Significant cost savings for the residents

35. Net Zero carbon homes are significantly cheaper to run than a standard new build house. This is due to the combined effects of lower energy demand alongside greater flexibility of energy use during the day, and home use of solar electricity where PV is installed.

Avoided costs for retrofitting and to society as a whole

36. Continuing to construct buildings that use fossil-fuel dependent space and water heating systems will be financially misguided in most cases. Designing a home for a heat pump-based system from the outset is estimated to cost around one-fifth of the cost of retrofitting that technology to the same quality and standard⁷.

37. There are also wider off-site benefits of 'getting it right now' in terms of reduced energy infrastructure costs as less renewable energy generation will be required to achieve a decarbonised national grid.

38. Within a generation the heating system will need to be replaced, and there is no guarantee that similar replacements will still be legal and available. Future retrofitting will also generate further embodied carbon emissions in the refurbishment process, especially if the original design was not future proofed for this eventuality.

39. Even in the unlikely event that there is no realistic alternative to a gas or oil boiler at the time of construction, future replacement costs can and should be avoided by designing and specifying the building to simplify a future air source heat pump retrofit for both space and water heating.

⁶ [Buying into the Green Homes Revolution](#), October 2022, Santander.

⁷ [UK housing: Fit for the future?](#), Climate Change Committee 2019, p14 See for example [Buyers of brand-new homes face £20,000 bill to make them greener](#), Guardian 23 Jan 2021. Analysis cited used Climate Change Committee data.





Part B: Requirements for Planning applications



Summary

40. Figure 3⁸ illustrates the recommended measures to achieve climate adapted development. Whilst the example shown is a residential dwelling the principles apply equally to other forms of development.

It is recommended that new homes are built to zero carbon standards using the standards and performance metrics defined by LETI (<https://www.leti.london>)

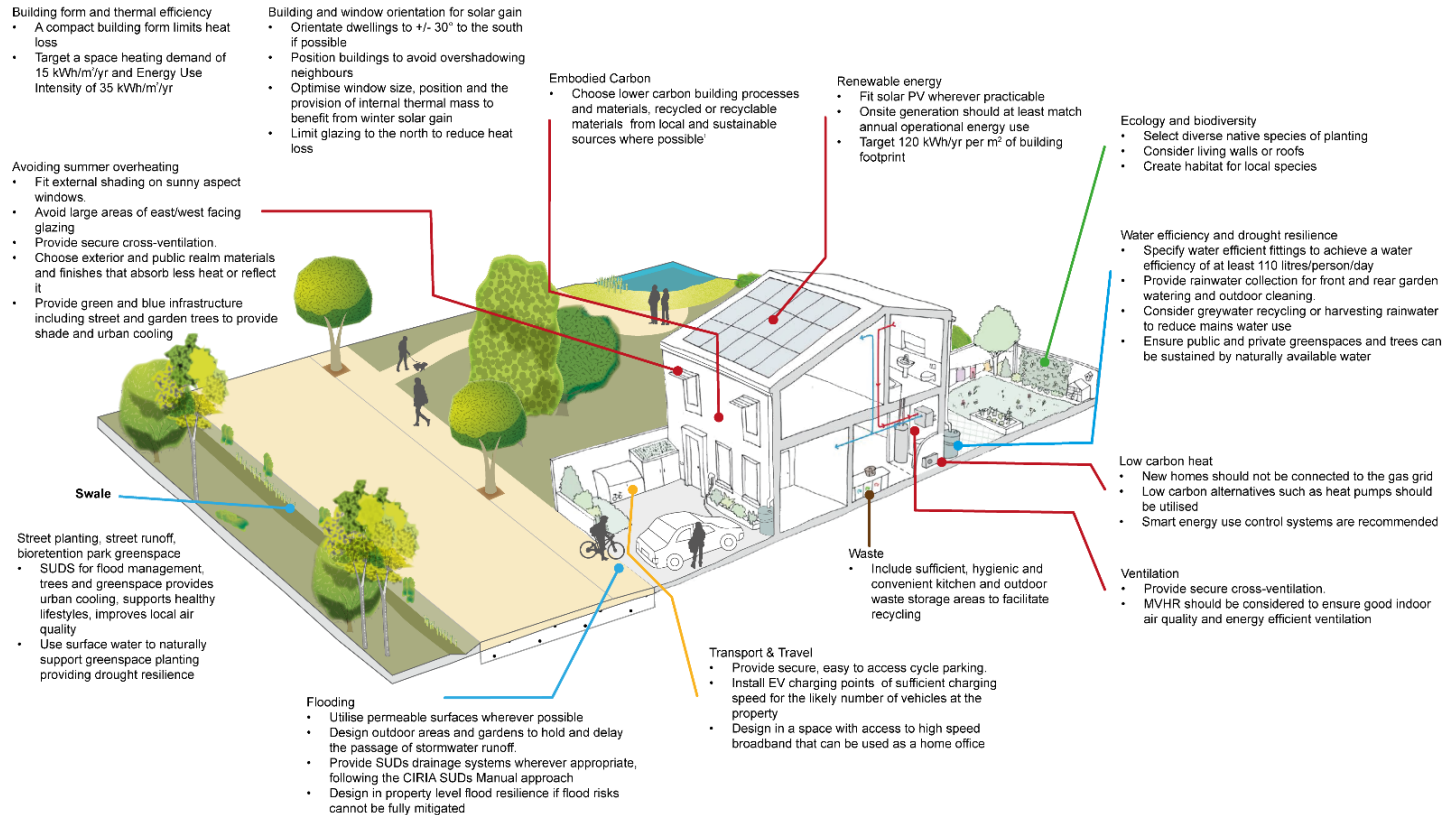


Figure 3: Recommended measures to achieve climate adapted development

⁸ Image copyright, re-used and adapted with the permission of Cheltenham Borough Council; Etude; April Grisdale Illustrations



41. Figure 4 summarises the information to be provided with planning applications, set out in more detail later in his section. Table 1 overleaf sets out information requirements by planning application stage and type. Figures 5-6 set out recommended technical building standards for houses and flats. For other development uses see section C.



Figure 4: Summary of planning application information requirements



Table 1: CCS information requirements by planning application stage and type

		Minor development		Major development			Notes
		1-9 homes	Other < 1,000sqm	10-49 homes	50+ homes	Other ≥ 1,000sqm	
Climate change mitigation and zero carbon							
1. Minimising operational energy demand targeting net zero carbon in operation							
1a	Minimising energy demand by design	Y	Y	Y	Y	Y	All development
1b	Low carbon heating systems	Y	Y	Y	Y	Y	Future Homes & Buildings commitment
1c	Energy use and carbon calculations	Y	Y	Y	Y	Y	For detailed design approval stage
1d	Smart energy systems	Y	N	Y	Y	N	Residential development
1e	Future proofing statement	Y	N	Y	Y	N	Relevant residential developments
1f	Heat pump pre-installation option	N	N	Y	Y	N	If heat pumps are not already included
2. On-site renewable energy generation							
2a	Onsite renewable energy	Y	Y	Y	Y	Y	Wherever feasible
2b	Renewable energy calculation	Y	Y	Y	Y	Y	For detailed design approval stage
2c	Option to purchase PV pre-installation	N	N	Y	Y	N	If PV is not already included
3. Reducing embodied carbon emissions							
3a	Reducing embodied carbon	N	N	Y	Y	Y	All major developments
3b	Calculating embodied carbon savings	N	N	N	Y	Y	Larger major developments
4. Sustainable travel (assessment will mainly use other planning application supporting information)							
4a	Cycle parking and EV charging	Y	Y	Y	Y	Y	All development
4b	Design to Building for a Healthy Life	N	N	N	Y	N	Larger residential developments

Continued overleaf

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Minor development		Major development			Notes
1-9 homes	Other < 1,000sqm	10-49 homes	50+ homes	Other ≥ 1,000sqm	

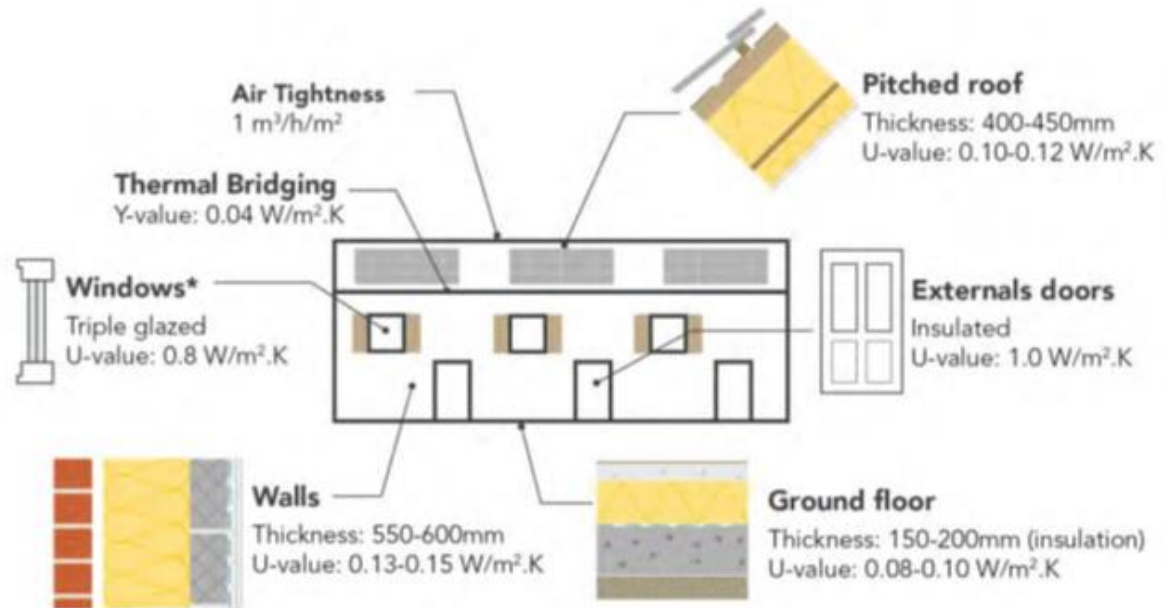
Climate change adaption							
5. Avoiding overheating							
5a	Natural heatwave mitigation	N	N	Y	Y	Y	All major development
5b	GHA Overheating risk assessment	Y	Y	Y	Y	Y	All residential developments
5c	Use of MVHR	Y	Y	Y	Y	Y	All developments
6. Drought resilience and using water efficiently							
6a	Managing surface water runoff	Y	Y	Y	Y	Y	All developments
6b	Reducing mains water demand	Y	Y	Y	Y	Y	All developments
7. Flood risk reduction and sustainable urban drainage (SUDs) (assessment will mainly use other planning application supporting information)							
7a	SUDs	N	N	Y	Y	Y	Wherever SUDs are appropriate
7b	Flood resilience measures	Y	Y	Y	Y	Y	Wherever residual flood risks remain

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Design checklist

- Form efficiency**
Ensure the building form is as simple and compact as possible
- Window proportion**
Follow recommended ratio of window to external wall
- Mechanical ventilation**
MVHR 90% efficiency
≤2m duct length from unit to external all
- Airtightness**
Airtight building fabric
< 1 m³/h/m² at 50 Pa
- Heating system**
Choose a low carbon heating system e.g. heat pump
- Design out overheating**
Carry out overheating analysis (as per CIBSE TM59 guidance) and reduce overheating through design e.g. external shading, openable windows and cross ventilation



Performance

As electricity generated on site with PVs is the same as the Energy Use Intensity (EUI) on an annual basis, the building is **Net Zero carbon in operation**.

- Typical terrace house built to building regulations
- New zero carbon terrace house

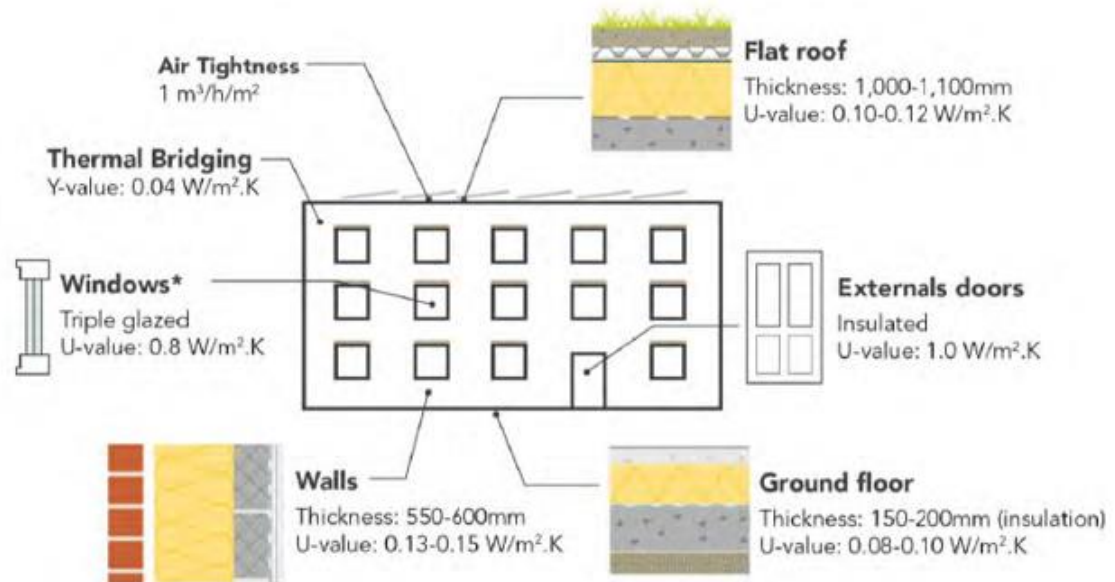


Figure 5: How zero carbon comes together – new terraced housing

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- Form efficiency**
Ensure the building form is as simple and compact as possible
- Window proportion**
Follow recommended ratio of window to external wall
- Mechanical ventilation**
MVHR 90% efficiency
≤2m duct length from unit to external all
- Airtightness**
Airtight building fabric
< 1 m³/h/m² at 50 Pa
- Heating system**
Choose a low carbon heating system e.g. heat pump
- Design out overheating**
Carry out overheating analysis (CIBSE TM59) and reduce overheating through design e.g. external shading, openable windows and cross ventilation



Performance

As electricity generated on site with PVs is the same as the Energy Use Intensity (EUI) on an annual basis, the building is **Net Zero carbon in operation**.

- Typical terrace house built to building regulations
- New zero carbon terrace house



Figure 6: How zero carbon comes together – a block of flats

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Planning application Climate Change Statements

Introduction

42. Planning applications must be supported by sufficient information to demonstrate how the proposed development will meet Local Plan requirements in relation to climate change (set out in paragraph 2 and Appendix 1). This evidence will be submitted in a **Climate Change Statement**⁹ (CCS) that addresses all the best practice objectives and information requirements set out in this section, unless they are clearly not relevant to the development type or location.
43. CCS requirements 1-4 address climate change mitigation and will also demonstrate how the proposed development will play its part in achieving net zero carbon by 2050, and a 78% reduction on 1990 levels by 2035. Further information is provided in Part C of this SPD. Requirements 5-8 address climate change adaptation.

Best practice and best endeavours

44. The Council recognises that some of the best practice standards are challenging, as they should be. The scale and urgency of the climate challenge means that 'business as usual' is not an acceptable option. It is a Local Plan requirement that meaningful steps are taken now, which means demonstrably improving on the carbon and energy efficiency performance and climate resilience of mainstream building practices.
45. The developers' CCS response will evidence the steps that will be taken to achieve best practice where possible. Developers also need to ensure that their designs are capable of meeting the Future Homes and Future Buildings standards. Where it is not possible to achieve best practice, the CCS will set out the options the developer has considered and tested. It will explain why the approach proposed represents best endeavours that reduce CO₂ emissions, energy demand and climate changes risks to the fullest extent practicable, and how future retrofitting costs have been minimised.

Proportionate information and what information to provide when

46. A reduced level of detail is acceptable for planning applications that are not 'major applications' i.e. less than 10 homes or less than 1,000 sqm (GIA) of other floorspace (both figures gross rather than net of any existing floorspace).
47. Where multiple buildings are proposed, data can be provided for a sample representative of the different types of buildings and their positioning and solar orientation on the site. The sample will be agreed in the planning application process.
48. Where the relevant design details are not known e.g. for outline planning applications, planning conditions to approve the details may be agreed. If during the life of an application material amendments are made the CCS may need to be updated.

Avoiding unnecessary duplication of information

49. Depending on the type, scale and location of the development a range of supporting information or technical studies must already submitted when a planning application is

⁹ The CCS is proposed to be added to the [Local Information Requirements](#) list, a process that will be undertaken and consulted on separately. Doing so would bring together in one place, and replace, equivalent information requirements already on the list in other documents e.g. the Renewable and Low Carbon Statement.



made. In addition, the Local Plan requires that non-residential development of 1,000 sqm GIA (gross) or more should attain BRE New Construction 'excellent' standard (Policy IMPL2), a process which culminates in an assessment report (development of 250-999 sqm GIA should attain excellent standard for water consumption).

50. This supporting information may provide a range of climate change related information. Where applicable and provided that the relevant matters are covered, it will be acceptable to address the information requirements of this SPD by submitting a CCS providing a summary response plus a cross reference to the parts of the submitted technical documents or assessments that cover the issue in more detail (provided that they are submitted at the point of planning application).
51. The same approach can be taken where the developer is using an independent benchmarking process for the quality, sustainability, carbon reduction or energy efficiency of the development, for example Passivhaus or BRE Home Quality Mark.

Climate Change Statement (CCS) contents

1. Minimising energy demand and targeting net zero carbon in operation

Best practice objectives:

The development process should actively target **net zero carbon in operation**, minimising by design the energy needed for heating, lighting, ventilation and cooling, opting wherever practicable for a heat pump or other efficient low carbon heating system. Passive design measures should be considered first to make effective seasonal use of solar gain and natural ventilation and cooling.

Specifications for new build fabric efficiency for residential development should target achieving a space heating demand under 15 kWh/m²GIA/year, and total operational energy demand (Energy Use Intensity) of under 35 kWh/m²GIA/year. Best practice benchmarks for re-purposing buildings for residential use, or other types of development should be agreed at pre-application advice stage, starting with the LETI / Net Zero Carbon Toolkit (SPD Section C 'Key Performance Indicators').

The inclusion of 'smart' energy use and heating control and monitoring systems that can also measure onsite renewable energy generation and use is recommended.

Secondary objectives:

Where net zero carbon in operation cannot be achieved currently, buildings should aim to be **zero carbon ready**¹⁰.

If a heat pump or other efficient low carbon heating system is demonstrably not practicable, or net zero carbon readiness cannot reasonably be achieved, the building should be **future proofed**: designed to reduce energy demand and CO₂ emissions as far as is currently practicable, and to minimise the cost and disruption of retrofitting the building to run efficiently with a heat pump system in the future.

For further information see SPD Part C section: [Getting the design right](#) and Consider Passivhaus tools and certification

¹⁰ Meaning net zero carbon in operation will be achieved when national electricity supply is fully decarbonised.



52. Passivhaus certification is considered a robust means to meet the space heating demand and Energy Use Intensity KPIs. It also drives quality assurance during construction. A Passivhaus 'certifier' will be required to act as an impartial quality assurance check on predicted performance during design and to carry out site inspections. Appendix 3 provides some recent examples of Passivhaus developments. For housing the Passivhaus Design Easi Guide provides further good practice advice.
53. Whether or not the Passivhaus approach is adopted, accurate energy modelling is recommended. Passivhaus tools can be used whether or not Passivhaus accreditation is for example the Passive House Planning Package (PHPP 10). Alternatively CIBSE TM54 Evaluating operational energy use at the design stage (2022).
54. It is also possible to target best practice by setting the right fabric specification and design requirements as part of the project brief, and this approach may be more cost effective for smaller developments in particular. The LETI Climate Emergency Design Guide sets out more detailed thermal and other building fabric performance specifications that need to be met to achieve the KPIs recommended in this design guide.

Future proofing heating technology

. The construction methods, airtightness, ventilation, heat pump and smart controls sections of the companion technical guidance document may also be helpful.

CCS 1a: Minimising energy demand by design (all development):

Explain how the design brief, performance specification and commissioning process for the development has (or will) actively seek to minimise energy demand in use, in particular for space and water heating.

CCS 1b: Low carbon heating systems (all development):

(i) State whether or not the developer is making a **Future Homes and Buildings Now** commitment to the installation of a low carbon, energy efficient heating system, and if not, to explain why it is not possible to do so. If this commitment is made the heating system details can be dealt with by a planning condition.

(ii) At the point of planning application for approval of the detailed design, confirm the heating system specified for the development. If a heat pump-based or alternative low carbon heating system is not specified, detail the lower carbon options that have been considered and explain why they are not feasible¹¹.

CCS 1c: Energy use and carbon calculations (all qualifying development):

At the point of planning application for approval of the detailed design, provide calculations of the space heating demand, total operational energy demand (EUI), CO₂ emissions per sqm GIA for the building designs proposed¹², and the total operational carbon emissions in tonnes per annum for the development as a whole. If the results exceed the recommended best practice targets, provide an evidenced justification that

¹¹ This assessment may draw on information required to be provided in accordance with the Building Regulations, regulation 25A: Consideration of high efficiency alternative systems, but the information is required at the point of planning application. Compliance with regulation 25A may not be sufficient to achieve compliance with planning policy requirements.

¹² Where there are multiple building types a representative sample will be agreed.



the best practicable outcome has been achieved for the location, type and form of development.

For developments of 10 or more dwellings or 1,000 sqm or more of other¹³ floorspace, energy use and CO₂ calculations should use an industry recognised method such as the [Passivhaus Planning Package](#) (PHPP) or CIBSE [TM54 Evaluating operational energy use at the design stage](#) (2022). For developments below these thresholds the same approach is recommended, but calculations based on the Target Primary Energy Rate required for Building Regulations (Part L) purposes will also be acceptable.

[CCS 1d: Smart energy systems \(all development\):](#)

Confirm whether or not smart energy use and heating control and monitoring systems will be fitted, and whether the system will be capable of measuring onsite renewable energy generation and use. If not, explain why it is not possible to do so.

[CCS 1e: Future proofing statement \(any residential development unable to commit to a low carbon heating system\):](#)

At the point of planning application for approval of the detailed design, provide a statement setting out all the works required to install a heat pump system in the future, including any associated building fabric or other upgrading necessary to ensure occupier comfort in winter. The future proofing statement is to be made available to all prospective buyers.

[CCS 1f: Option to purchase heat pump pre-installation \(relevant residential developments of 10 or more homes\):](#)

If heat pump installation is demonstrated by appropriate evidence to be unfeasible on the grounds of financial viability, buyers purchasing off-plan should be given the opportunity to purchase from the developer heat pump system pre-installation at a discounted supplementary cost.

2. On-site renewable energy generation

Best practice objectives:

On-site renewable energy generation should be provided wherever it is practicable to do so, wherever possible sufficient to at least meet annual operational energy use of the development to achieve net zero carbon development in operation.

Targeting on-site renewable energy generation of at least 120 kWh/year per square meter of building footprint is also recommended for residential development.

For further information see SPD Part C section: [On-site renewable energy generation](#). The Solar PV sections of the companion technical guidance document may also be helpful.

[CCS 2a: Onsite renewable energy \(all developments\)](#)

Set out the development approach to optimising the generation of onsite renewable energy. If no onsite renewable energy provision is proposed explain why it is not possible to do so. If the developer makes a commitment to

¹³ Information that already has to be provided in accordance with Building Regulations Part L(2), para 94



the provision of onsite renewable energy the details can be dealt with by a planning condition.

[CCS 2b: Renewable energy generation calculation \(all development providing onsite renewable energy generation\):](#)

At the point of planning application for approval of the detailed design, provide a calculation of the renewable energy that will be generated on-site, in total, per building¹⁴ and per sqm of building development footprint. Express this value as a percentage of the best practice target of 120 kWhm²/year, and as a percentage of the building operational energy use (EUI) calculated for CCS 1c.

If the onsite renewable energy generated is below the predicted annual regulated operational energy use, provide a justification that the best practicable outcome has been achieved for the development proposed.

[CCS 2c: Option to purchase PV pre-installation \(all residential developments of 10 or more homes where effective PV installation is feasible\):](#)

Where PV installation on a residential development is possible but demonstrated by appropriate evidence to be unfeasible on the grounds of financial viability, every new home buyer purchasing off-plan a dwelling with a roof suitable for PV should be given the opportunity to purchase from the developer pre-installation of a PV system at a discounted supplementary cost.

3. Reducing embodied carbon emissions

Best practice objectives:

As an interim step towards the full decarbonisation of construction by 2050, developers should take all practicable steps to meaningfully reduce embodied carbon emissions from construction materials and processes up to the point of practical completion.

If a [UK Net Zero Carbon Buildings Standard](#) is published this objective will be updated.

For further information see SPD Part C section: On-site renewable energy generation

55. As noted under KPIs, net zero carbon in operation can only be achieved by meeting the energy needs of the development using renewable electricity generation provided for the development, as fossil fuels are still used to produce mains electricity.
56. Solar PV panels installation is the recommended approach, a simple, mature and reliable renewable energy technology. They are a particularly good match for heat pumps, as much of the electricity generated outside peak use periods can be used to heat water or charge electric vehicles for later use. PV tiles are an alternative that may be more appropriate on heritage buildings or in conservation areas. Further information on PV systems is provided in the companion technical document to this SPD, the best examples convert solar energy more efficiently and have a longer lifespan.
57. A key advantage of PV is that it can be usually provided on-site as part of the development process without additional land take. The majority of new homes have sufficient space on site to generate as much energy as they need on an annual basis, especially if the roof design is optimised to make best use of southerly aspects. PV

¹⁴ Where there are multiple building types a representative sample will be agreed.



can also be mounted over parking areas and on south facing walls. The latter is less efficient than roof mounting but it can improve power generation in winter months when the sun is lower and energy demand is higher.

Embodied carbon

CCSC 3a: Reducing embodied carbon (all major development):

Identify and describe any steps that have been or will be taken to reduce carbon emissions from the construction process up to the point of practical completion.

CCSC 3b: Calculating embodied carbon reductions (developments of 50 or more homes or more than 1,000 sqm GIA other uses):

Provide a calculation of the carbon emissions saved by these steps using a recognised methodology, expressed in tons CO₂e and as a percentage of total embodied carbon in the development up to the point of practical completion.

4. Sustainable travel

Best practice objectives:

To minimise the need to travel, and to optimise opportunities to travel when needed by active and public transport modes, or by electric vehicle.

For further information see SPD Part C section:

[Facilitating sustainable transport](#)

Note: Sustainable travel implications will primarily be assessed from information in one or more of the following documents where they are required to be provided when a planning application is submitted: the [Design and Access Statement](#), [Transport Assessment](#), [Travel Plan](#) for the site.

CCS 4a: Cycle parking and EV charging (all development):

At property level provide secure and accessible cycle parking and EV charging capacity sufficient for the number of occupants/users likely to be present.

CCS 4b: Building for a Healthy Life (residential development 50+ homes):

Development proposals should be assessed using the [Building for a Healthy Life](#) design approach, and should seek to achieve a green light score for all assessment considerations.

5. Avoiding overheating

Best practice objectives:

To support building and general urban cooling in peak summer and heatwave conditions by good design, including planting strategies, green and blue infrastructure provision and hard landscaping. At building level, to design out summer overheating risks and to avoid the need to install air conditioning.



For further information see SPD Part C section: [Designing out overheating risks](#)

Note: Where relevant, CCS responses may briefly summarise and cross refer to information in one or more of the following documents, where they are required to be provided when a planning application is submitted: [Biodiversity Survey and Report](#), [Design and Access Statement](#), [Sustainability Statement](#), [Tree Survey /Arboricultural Statement](#), [Ventilation/Extraction Statement](#).

[CCS 5a: Natural heatwave mitigation \(all major development\)](#)

Describe how heatwave avoidance and mitigation has informed the planting and landscaping strategy, including any green and blue infrastructure provision, and the choice of building materials and surfaces including hard landscaping.

[CCS 5b: Overheating \(all residential development\)](#)

For residential development complete and submit the [Good Homes Alliance early stage overheating risk tool](#) assessment prior to finalising the detailed design of the development (see appendix 2). The total overheating risk score should be 'low' in the design submitted for planning approval. If a low score cannot be achieved, explain why and set out how the residual overheating risks will be mitigated. Parts of the tool will be also useful for non-residential development.

[CCS 5c: MVHR \(all development\)](#)

Confirm whether or not Mechanical Ventilation Heat Recovery (MVHR) will be provided.

Designing out overheating risks

6. Flood risk reduction and sustainable urban drainage (SUDs)

7. Drought resilience and using water efficiently

Surface water management and drought resilience should be considered together.

Best practice objectives:

To reduce demand for mains water. To ensure that private gardens, public realm planting, greenspaces and water features are drought and climate resilient and can be sustained without using mains water.

To naturally and safely manage and dissipate surface water run off under climatic extremes. To incorporate SUDs wherever they are capable of being effective, designed to minimise runoff discharge to sewers and to maximise amenity, biodiversity and water quality co-benefits.

[CCS 6a: Managing surface water runoff \(all developments\)](#)

Identify measures included or proposed to naturally dissipate, hold or slow the movement of surface water in both public and private areas. Identify any hardstanding and paved surfaces that are not water permeable and explain why a permeable or partly permeable surface is not practicable.

[CCS 6b: Reducing mains water use \(all developments\)](#)



Describe the measures proposed, or at detailed design stage specified, to reduce the need for mains water use and to make best use of surface water runoff. Install appropriately sized water butts as standard in all front and rear gardens or yard spaces where a gutter downpipe can be provided.

[CCS 7a: SUDs \(all major developments where SUDs are appropriate\)](#)

- i. Demonstrate how SUDS have been designed and specified as an integral part of the site masterplanning process in accordance with the best practice approach set out in the CIRIA [SUDs Manual](#) (C753). Identify any proposed piped or other runoff discharge to sewers and explain why a surface-based drainage approach discharging to a watercourse was not possible e.g., with a revised development layout.
- ii. Explain how measures to minimise nutrient runoff have been incorporated into the SUDs design.

[CCS 7b: Flood resilience measures \(any development where its flood risk assessment identifies residual flood risks, including residual risks identified when applying the appropriate Environment Agency climate change allowance¹⁵\)](#)

Briefly summarise and provide a cross reference to the section of the FRA that addresses proposed flood resistance and flood resilience measures. Demonstrate that any such measures are specified in accordance with CIRIA [Designing for exceedance in urban drainage - good practice](#) (C635F) and the CIRIA [Code of practice for property flood resilience](#) (C790A).

For further information see SPD Part C sections:

[Drought resilience and using water efficiently](#)

[Reducing mains water use](#)

[Reducing flood risk through Sustainable Urban Drainage \(SuDS\)](#)

¹⁵ [Flood risk assessments: climate change allowances - GOV.UK \(www.gov.uk\)](https://www.gov.uk)





Part C: Climate Change mitigation and adaption



About this section

58. This section is derived in part from the Net Zero Carbon Toolkit (NZCT), updated for NFDC circumstances and with additional information added on aspects of climate change adaption. This toolkit was created to make Net Zero carbon building more accessible. Although it can be used by homeowners, it is aimed at those who already have some knowledge or experience of construction.
59. The main focus is on new housing, but the principles apply equally to other uses. Supporting information is provided in the appendices, and technical sections of the original NZCT document are provided in a companion document.

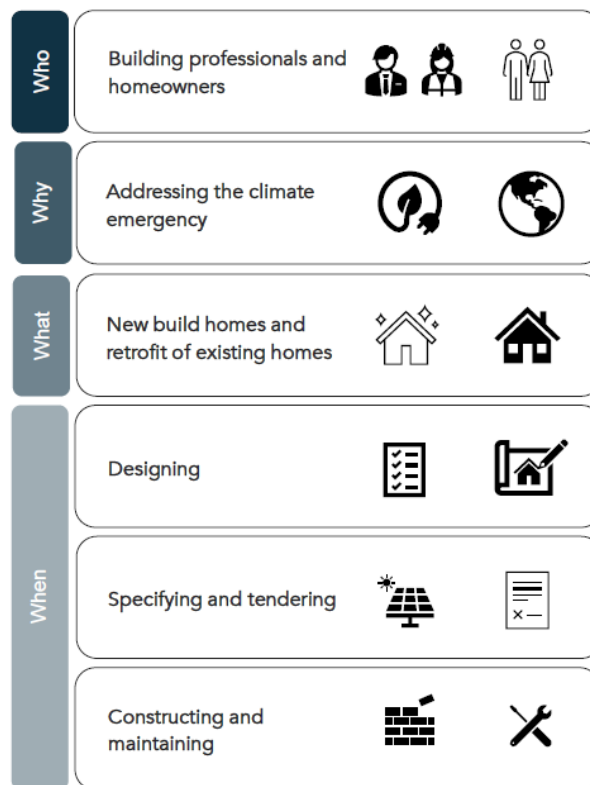


Figure 5: Toolkit breakdown

From site selection to construction to operation

60. The toolkit, including the appendices and the SPD companion document, covers all stages of building design and construction, including maintenance and operation.

Understanding the complete picture

61. The toolkit including SPD appendices aims to build the awareness and confidence of people implementing low or zero carbon projects and generally seeks to answer the following questions:

- Why do this?
- What does “good” look like?
- What to do when and how to bring it all together?
- What to specify and some product options.



Net Zero carbon buildings: core principles and definitions

Operational net zero carbon

62. The three core principles of buildings that are net zero in operation are energy efficiency, low carbon heat and the use of renewable energy. Buildings should also minimise carbon emissions from materials production and construction processes to be fully net zero.

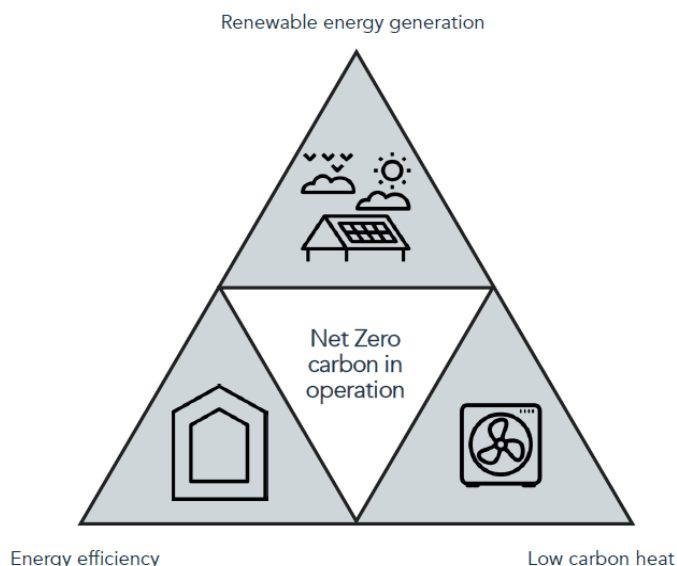


Figure 6 The three pillars of a Net Zero carbon building in operation

Energy efficiency

63. Buildings use energy for heating, hot water, ventilation, lighting, cooking and appliances. The efficient use of energy reduces running costs and carbon emissions. Importantly, it also reduces a building's impact on the wider energy supply network. There are two key metrics used in this toolkit to measure the energy efficiency of a building, both expressed in kWh/m²/yr.

- **Energy Use Intensity (EUI)** is the annual total energy consumed running and occupying a building divided by its floor area. It is the sum of regulated energy (for heating, hot water, cooling, ventilation, and lighting systems – so called as it is covered by the Building regulations) and unregulated energy (use for plug in devices that is outside of the scope Building Regulations).
- **Space heating demand** is the energy required to heat the building, usually the largest component of regulated energy.

Low carbon heating

64. An essential feature of Net Zero carbon buildings is the use of low carbon sources of heat with no connection to the gas network.

Renewable energy generation

65. In new buildings, renewable energy generation should be at least equal to the annual energy use of the building for it to qualify as net zero carbon in operation. This is straightforward to achieve on site for most new homes by installing solar photovoltaic (PV) panels, which will also help to support the increased demand for renewable energy.



Key Performance Indicators (KPIs)

What energy use targets should I aim for?

66. Energy use targets are more transparent and robust than carbon reductions targets for ensuring zero carbon is delivered in practice. The Net Zero Toolkit recommends targets consistent with the [LETI Climate Emergency Design Guide](#) (2019).

Housing

67. Best practice KPIs for new homes are set out in figure 7. All KPIs except the embodied carbon target must be met for a home to be Net Zero carbon in operation and to achieve an ultra-low energy home with very low space heating demand. Space Heating Demand is an excellent proxy for the fabric efficiency of the building - 15 kWh/m²/year is exemplary, requiring a fabric efficiency and airtightness equivalent to that of a new Passivhaus home.

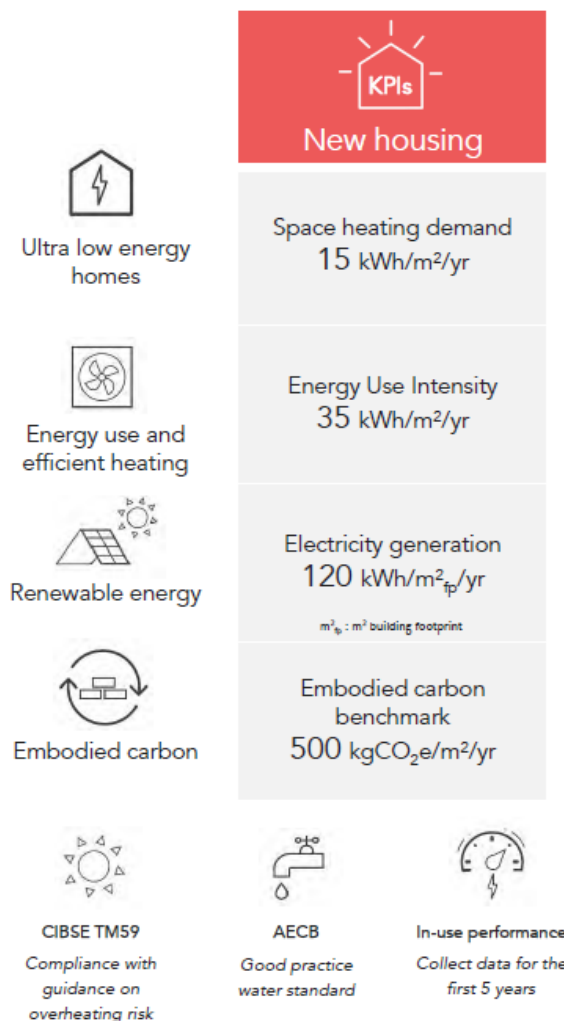


Figure 7: Housing KPIs

KPIs for other uses

68. Non-residential building types tend to vary more widely than housing, making it more difficult to reliably determine generic forms, energy use or occupancy models. However, as noted in the Net Zero Carbon toolkit the RIBA, LETI, the UKGBC and other organisations have published relevant guidance on performance targets for space heating demand, total energy use and renewable generation, summarised in Net Zero Carbon Toolkit as follows.



Schools

- Space heating demand of 15-20 kWh/m² GIA/year
- Total energy consumption of 65 kWh/m² GIA/year or less
- Solar electricity generation that exceeds metered energy use on site

Hotels

- Space heating and cooling demand of less than 30 kWh/m² GIA/year
- Total energy consumption of 55 kWh/m² GIA/year or less
- Solar electricity generation at least 120 kWh/m² GIA/year

Offices

- Space heating and cooling demand of less than 15 kWh/m² GIA/year
- Total energy consumption of 55 kWh/m²/year or less
- Solar electricity generation at least 120 kWh/m² GIA/year

Light Industrial

- Space heating and cooling demand of 15-30 kWh/m² GIA/year
- Total energy consumption of around 55 kWh/m² GIA/year excluding specialist processes
- Solar electricity generation of least 180 kWh/m² GIA/year.

69. Note that the Local Plan 2020 requires that ‘major’ non-residential development of 1,000sqm GIA or Schools more should attain [Building Research Establishment \(BRE\) New Construction](#) ‘Excellent’ standard. Development of 250-999 sqm GIA should attain excellent standard for water consumption. The primary aim of BRE assessment is to mitigate the life cycle impacts of new buildings on the environment in a robust and cost-effective manner. In relation to zero carbon the BRE approach takes a ‘whole life cycle’ approach to construction impacts, encouraging measures to improve the energy efficiency of the building and to reduce carbon emissions. But as BRE New Construction does not set specific energy targets the energy efficiency benchmarks above are recommended as well.
70. Note that for non-residential development of 1,000sqm ‘useable floorspace’ energy use reporting is already a Building Regulations¹⁶ requirement. In meeting this requirement an industry recognised energy forecasting methodology such as CIBSE [TM54 Evaluating operational energy use at the design stage](#) should be used.

Why set a renewable energy target?

71. Net zero carbon in operation can only be achieved by meeting the energy needs of the development using renewable electricity generation provided for the development. A significant proportion of mains electricity is currently generated from fossil fuels.

Reducing the embodied carbon of a building

72. To go beyond net zero in operation towards net zero for the whole building lifecycle, embodied carbon must be significantly reduced and any residual carbon can be offset, for example by tree planting. This can be achieved by making informed design decisions about materials based on quantified carbon reductions.

¹⁶ Para 94 Building Regulations Part L(2).



A recipe for achieving Net Zero carbon development

Setting the right brief and targets is key

73. To achieve Net Zero carbon in reality it is important that the development design brief and its Key Performance Indicators (KPIs) reflect this ambition from the start. Getting the right people involved at the right points in the design and construction timeline is critical, including specialists in low energy and zero carbon design. The key steps up to building handover are set out in the **Error! Not a valid bookmark self-reference.** below, showing a timeline for design and construction. See Appendix 4 for a more detailed breakdown by RIBA design and construction stage.

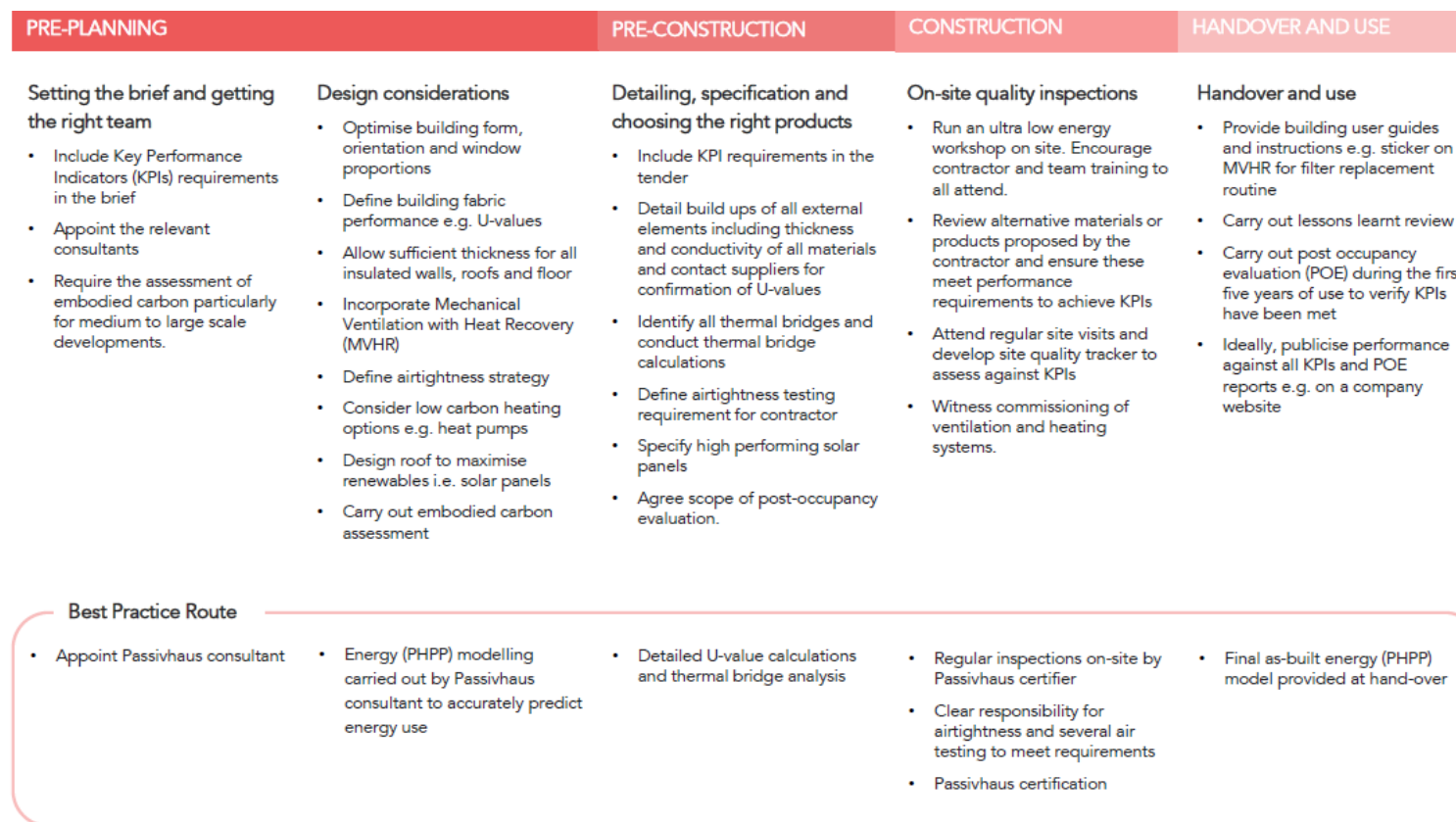


Figure 8: Timeline for design and construction



Getting the design right

74. Making informed decisions at an early design stage is key to delivering energy efficiency in practice. A building's form, orientation and window proportions are all aspects that do not add extra construction cost, but if optimised within the design can significantly improve the building's efficiency (see figure 9).

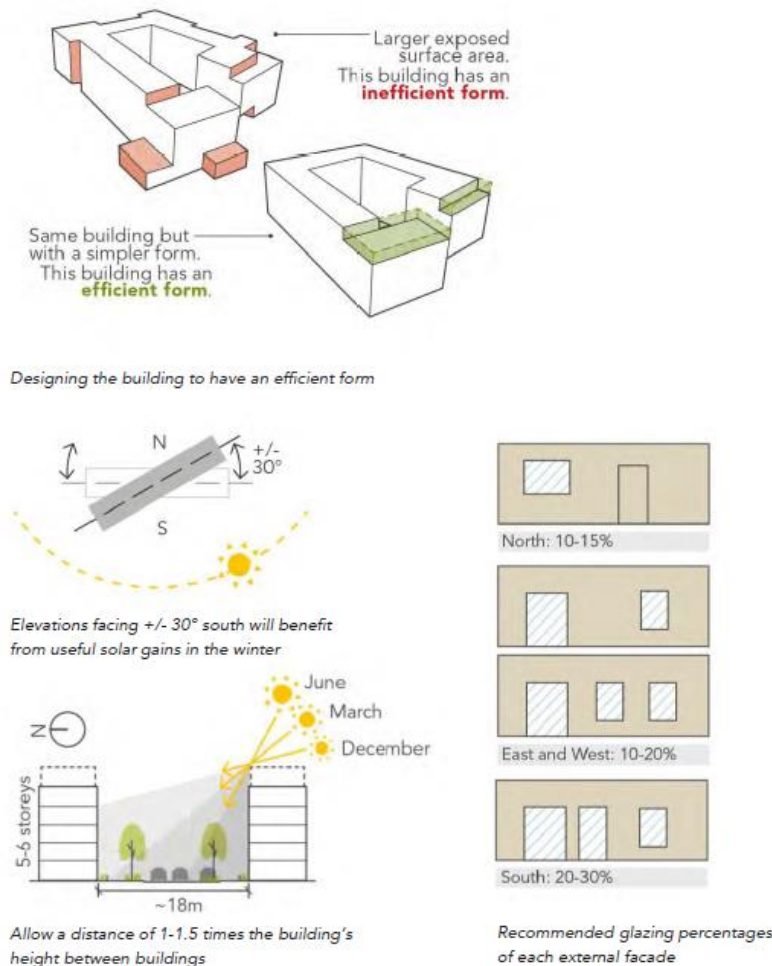


Figure 9: Optimising design (Source: Levitt Bernstein + Etude)

Building form and orientation

75. The building form should be as simple and compact as possible to reduce the surface area exposed for heat loss. Avoid or limit the use of stepped roofs, roof terraces, overhangs and inset balconies. These features will decrease the building's energy efficiency.

76. The orientation and massing of the building should be optimised to allow useful solar gains and prevent significant overshadowing in winter. Encourage south facing dwellings with summer solar shading and prioritise dual aspect.

Window proportions and thermal performance

77. Getting the right glazing-to-wall ratio on each façade is a key feature of energy efficient design. Minimise heat loss to the north (smaller windows) while providing sufficient solar heat gain from the south (larger windows). In a block of flats it is much easier to design smaller windows facing access decks and larger windows facing balconies. Therefore, try to orientate access decks to the north and balconies to the south.



Fabric first approach

78. Specifying a high level of thermal efficiency and airtightness of the building fabric, and for the thermal performance of elements such as doors and windows is critical to reducing energy demand. The [LETI Climate Emergency Design Guide](#) provides best practice thermal specifications for building elements cited in this SPD. It is equally important that high standards are maintained in the construction process¹⁷ to deliver the full thermal efficiency potential of the materials used.

Consider Passivhaus tools and certification

79. Passivhaus certification is considered a robust means to meet the space heating demand and Energy Use Intensity KPIs. It also drives quality assurance during construction. A Passivhaus 'certifier' will be required to act as an impartial quality assurance check on predicted performance during design and to carry out site inspections. Appendix 3 provides some recent examples of Passivhaus developments. For housing the [Passivhaus Design Easi Guide](#) provides further good practice advice.
80. Whether or not the Passivhaus approach is adopted, accurate energy modelling is recommended. Passivhaus tools can be used whether or not Passivhaus accreditation is for example the [Passive House Planning Package](#) (PHPP 10). Alternatively [CIBSE TM54 Evaluating operational energy use at the design stage](#) (2022).
81. It is also possible to target best practice by setting the right fabric specification and design requirements as part of the project brief, and this approach may be more cost effective for smaller developments in particular. The [LETI Climate Emergency Design Guide](#) sets out more detailed thermal and other building fabric performance specifications that need to be met to achieve the KPIs recommended in this design guide.

Future proofing heating technology

82. As previously noted an essential feature of net zero carbon buildings is the use of low carbon sources of heat with no connection to the gas network. Heat pumps¹⁸ are considered the most efficient low carbon heat source, significantly more efficient than direct electric heating as they generate 3-4 units of heat for each unit of electricity used. They should be specified wherever possible.
83. If specification of a gas or oil-fired boiler cannot be avoided in a new build, the CCS accompanying the planning application should directly address all the following matters in this section, as part of achieving or getting as close as is practicable to zero carbon readiness.
84. A responsible designer should ensure that the building can be easily retrofitted by making adequate provision in the initial design to ensure that a heat pump can be installed in the future with a minimum of cost and disruption. Any proposed building that would require extensive modifications to fit and efficiently operate with a heat pump cannot be considered local plan compliant in terms of being future proofed for climate change, let alone zero carbon ready.
85. A heat pump system typically requires a dedicated external space for a heat pump unit, sites where its operational noise will not disturb occupants or neighbours' sleep, and internal space nearby for a control system and a hot water cylinder. Sufficient space will be needed in the building and its curtilage, and these future installation spaces should be clearly identified on submitted plans.
86. Wherever a typical 'wet' heating system is installed with a gas or oil boiler feeding radiators or underfloor heating, the designer must ensure that the pipe diameters and heat radiating

¹⁷ Further information on construction standards and airtightness is provided in the accompanying document.

¹⁸ Further information on heat pumps is provided in the accompanying document.

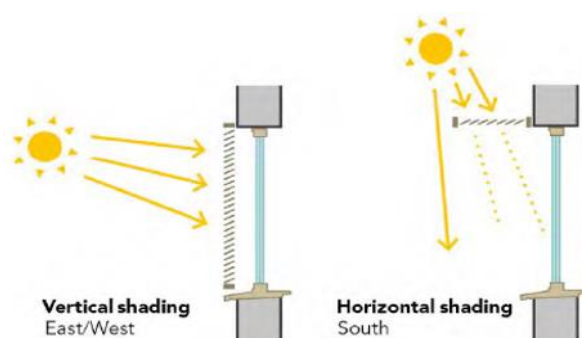


fixtures are sufficiently large to supply enough heat when attached to a heat pump with a lower flow temperature. The level of building insulation and thermal efficiency may also be relevant. Making changes retrospectively to the building fabric or to the heating system is likely to be costly and disruptive.

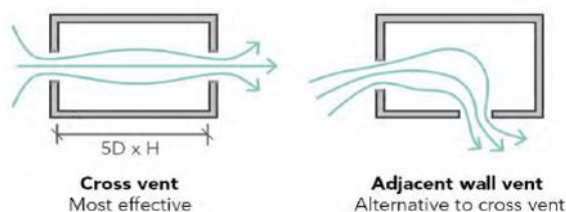
87. For an air-to-water heat pump BS EN 14511¹⁹ specifies a return and flow temperature of 40°C and 45°C respectively. The Building Regulations Part L (2021), Annex D, provides a reference design flow temperature value of 45°C for air source heat pump and radiators in a new dwelling. Note that heat pumps are usually more efficient operating at 30-35°C, and the Building Regulations set a maximum flow temperature of 55°C for residential gas boilers²⁰.

Designing out overheating risks

88. This section focuses on overheating risks can be reduced by good design and site masterplanning decisions early in the building design process. The aim should be to avoid unnecessary additional carbon emissions by using natural and design-based ventilation and cooling mechanisms, resorting to air conditioning only where there is no practicable alternative.
89. At building level, the Building Regulations regulate overheating (Part O: Overheating) and ventilation (Part F) based on the detailed building design. Part O applies to residential development only, requiring that all practicable passive means of limiting unwanted solar gains and removing excess heat have been used first before adopting mechanical cooling. Where the Building Regulations compliance process includes thermal modelling, the modelling process should include a summer design year (DSY) file with 2050 and 2080 climate scenarios. Building Regulation compliance outputs may usefully form part of the information provided under CCS section 5.



Provide horizontal shading on the south facade (e.g. brise-soleil or deep reveals) and vertical shading on the east or west façade (e.g. shutters). Design solar shading to allow useful solar gains in winter and block solar gains in summer.



Design for dual aspect homes to allow for natural cross ventilation

Figure 10: Overheating reduced by good design

¹⁹ [BS EN 14511: 2022 - Air conditioners, liquid chilling packages and heat pumps with electrically driven compressors for space heating and cooling](#)

²⁰ Part L 5.10



90. Design measures to avoid overheating include the following

- Ensuring glazing areas are not excessive i.e. not more than 20-25% of facade on south or west façades.
- Avoiding fixed panes and maximise opening areas of windows. Side hung windows typically allow more ventilation than top hung.
- Favouring dual aspect homes and other buildings to allow cross ventilation.
- Providing appropriate solar shading. South façades should have horizontal shading over the window and the west façade should ideally have movable vertical shading e.g. shutters.
- Avoiding relying on internal blinds, which can be removed by residents.
- Selecting a g-value (the solar factor indicating how much heat is transmitted from the sun) for glass of around 0.5 where possible.

91. For residential developments use of the [Good Homes Alliance Overheating in New Homes Checklist](#) (reproduced at Appendix 2) is recommended for overheating risk assessment early in the design process. It is intended to be used prior to the detailed design stage before planning submission and approval. Parts of the tool will also be useful for non-residential development.

92. A balanced approach is needed to optimise natural daylight, maximise winter solar gain, avoid excess summer solar gain and achieve good indoor air quality with high airtightness standards. Where noise is also a consideration use the Acoustics and Noise Consultants (ANC) [Acoustics, Ventilation and Overheating Residential Design Guide](#) to determine an approach to acoustic assessment.

On-site renewable energy generation

93. As noted under KPIs, net zero carbon in operation can only be achieved by meeting the energy needs of the development using renewable electricity generation provided for the development, as fossil fuels are still used to produce mains electricity.

94. Solar PV panels installation is the recommended approach, a simple, mature and reliable renewable energy technology. They are a particularly good match for heat pumps, as much of the electricity generated outside peak use periods can be used to heat water or charge electric vehicles for later use. PV tiles are an alternative that may be more appropriate on heritage buildings or in conservation areas. Further information on PV systems is provided in the companion technical document to this SPD, the best examples convert solar energy more efficiently and have a longer lifespan.

95. A key advantage of PV is that it can be usually provided on-site as part of the development process without additional land take. The majority of new homes have sufficient space on site to generate as much energy as they need on an annual basis, especially if the roof design is optimised to make best use of southerly aspects. PV can also be mounted over parking areas and on south facing walls. The latter is less efficient than roof mounting but it can improve power generation in winter months when the sun is lower and energy demand is higher.



Embodied carbon

96. For development embodied carbon emissions are associated with the extraction, processing, production and transportation of building materials and products, and in the construction of the building. Embodied carbon arises after the building is completed from its maintenance and the demolition and disassembly of the building at the end of its life.
97. Whilst embodied carbon is not currently (2023) covered by the Building Regulation or any other statutory controls, over time embodied carbon will become and even more significant proportion of whole-life carbon and commensurately more important to achieving zero carbon development. This is because:
- Carbon emission from operational energy consumption will reduce independently of measures by developers or occupier behaviour as the National Grid decarbonises electricity supply
 - As new buildings become more energy efficient to run and switch to low carbon heating sources, operational carbon emission will become a smaller proportion of total carbon emissions than they are currently.
98. As building materials typically account for around 60-70% of the embodied carbon in a development, it is essential to consider embodied carbon at the start of the design process. Low embodied carbon design is not inherently more expensive or more complex, it just requires awareness, good design and specification informed by design the use of appropriate carbon calculation tools for building products, systems and processes.
99. Developers should demonstrate in their CCS submissions that they are taking active steps to reduce the embodied carbon and embed a sustainable approach to resource use in their developments, for example by an appropriate combination and balance of the following measures, wherever applicable and feasible.

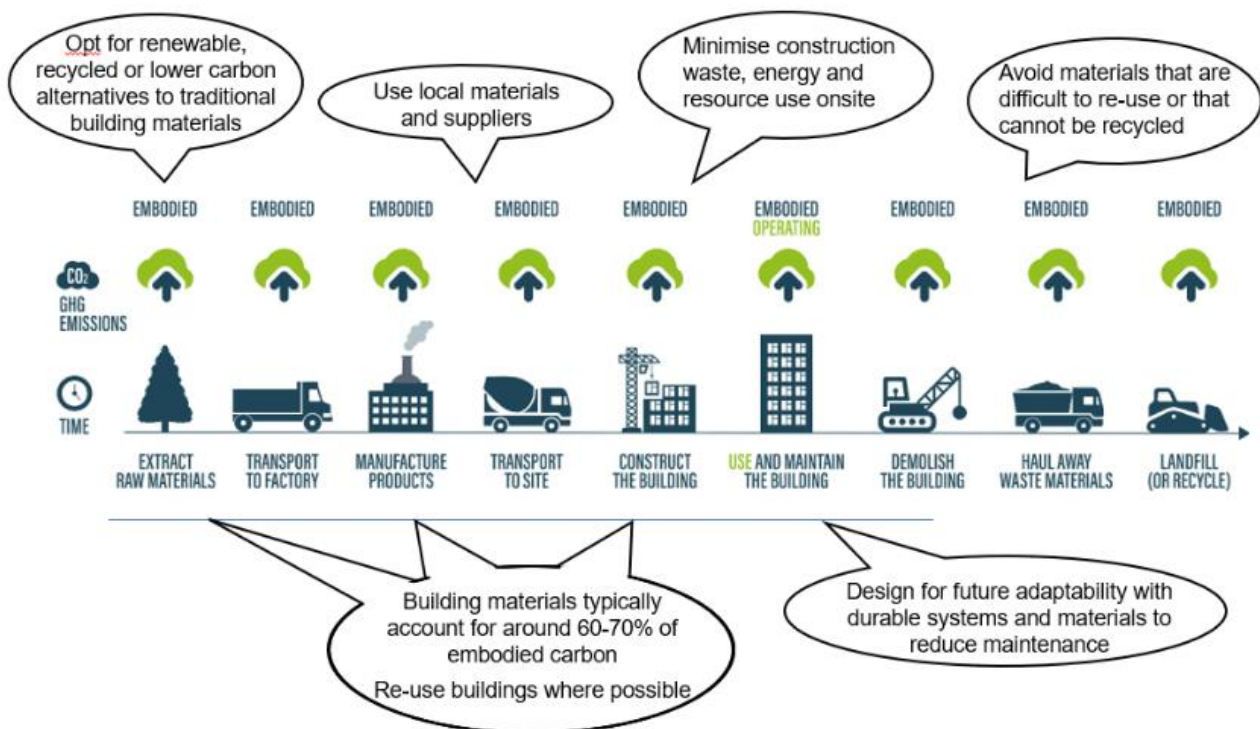


Figure 11: Reducing carbon emissions embodied in construction²¹

²¹ Image copyright and re-used with the permission of [Buildpass](#)



What can you do?

- 1 Refurbishment over new build**
Only build new when existing homes cannot be reused or refurbished.
- 2 Lean design**
Structural: Design structure for 100% utilisation. Use bespoke loading assumptions, avoid rules of thumb. Reduce spans and overhangs.
Architectural: Use self-finishing internal surfaces. Reduce the quantity of metal studs and frames.
Building services: Target passive measures (e.g. improved fabric) to reduce the amount of services. Reduce long duct runs, specify low Global Warming Potential (GWP) refrigerant (max. 150) and ensure low leakage rate.
- 3 Material and product choice**
Prioritise materials that are reused, reclaimed or natural from local areas and sustainable sources and that are durable. If not available use materials with a high recycled content. Use the following material hierarchy to inform material choice particularly for the building structure;
 1. Natural materials e.g. timber
 2. Concrete and masonry
 3. Light gauge/Cold rolled steel
 4. Hot rolled steel

Ask manufacturers for Environmental Product Declarations (EPD) and compare the impacts between products in accordance with BS EN 15804
- 4 Housing adaptation & flexibility**
Allow for flexibility and consider how a layout may be adapted in the future.
- 5 Easy access for maintenance**
Maintained equipment will last longer.
- 6 Design for disassembly**
Consider disassembly to allow for reuse at the end of life of the building. Create material passports for elements of the building to improve the ability of disassembled elements to be reused.

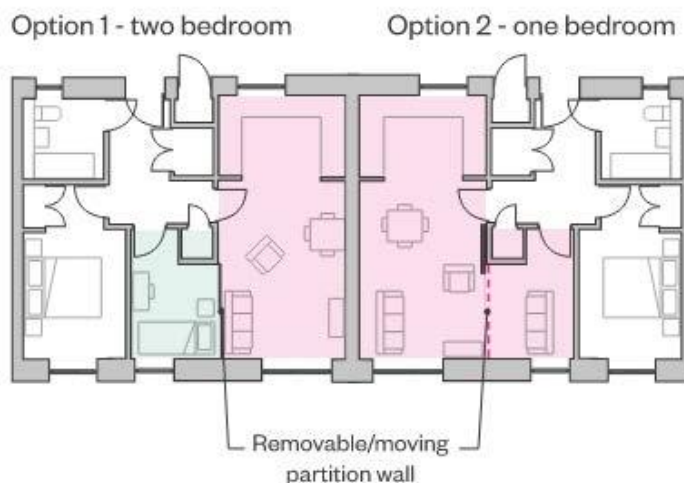


Figure 12: Design for adaptation using a flexible floor plan e.g., one bed flat can be converted to a two bed flat or a one bed flat with space for home working.



Facilitating sustainable transport

100. Carbon emissions reductions can be made by reducing the need to travel, and by enabling lower carbon travel choices such as active travel (walking and cycling) for trips that need to be made.
101. Convenient and secure cycle storage is effective in encouraging journeys by bike. Consider how can they be integrated into the design. See the [NFDC Parking Standards SPD](#) (2022) for further guidance.
102. Consider how the home can support effective homeworking to help reduce unnecessary commuting. Are there sufficient plug and internet connectivity sockets? Is there room for a home office space?
103. The Building Regulations now require that new properties be supplied with electric vehicle charging points, in most circumstances. Faster and higher capacity chargers will be helpful especially for households with more than one electric vehicle.

Building for a healthy life

104. The [Building for a Healthy Life](#) (BFHL) design approach is recommended to help achieve active, well-connected and healthy communities, including by promoting sustainable movement and active travel. BFHL is backed by the NHS and endorsed and use by Homes England. BFHL is a collaborative design approach and process based on twelve design considerations organised into three themes: integrated neighbourhoods, distinctive places and streets for all. THE BFHL approach is aligned to Manual for Streets, the NPPF and the National Model Design Code.
105. The twelve BFHL considerations should be addressed from the start of the design process. The recommended approach is for the council and developers to discuss and agree at pre-application advice stage what best practice outcomes can and should be achieved under each consideration for that particular site and development.
106. The BFHL process culminates in an independent assessment of the development proposal, rating each consideration as green (achieves best practice), red (stop and rethink) or amber (try and improve). The aim is to achieve 12 green ratings where possible, and no avoidable amber ratings (some outcomes might be beyond the developer's control, e.g. if they require unobtainable access to third party land). As the target best practice outcomes are tuned for the specific development, all red ratings are avoidable and should be designed out.

Drought resilience and using water efficiently

Reducing mains water use

107. New Forest District is within a wider water stressed area identified by the Environment Agency. Current rainfall levels already make it challenging to sustainably meet mains water demand without adversely affecting nationally and internationally protected habitats. The climate trend to drier and hotter summers may exacerbate these issues, increasing the frequency of periodic controls such as summer hosepipe bans.
108. Making more effective use of both mains and natural water resources will become an increasingly important part of living within environmental limits, with beneficial CO₂ emission savings possible from cumulative reductions to water supply and treatment. The measures in this section build on the SUDs approach that treats naturally available water on development sites as a valuable resource.
109. The Building Regulations set mains water use standards. Local Plan **Policy IMPL2: Development Standards** requires that new residential development meets the higher Building Regulations water efficiency standard of under 110 litres per person per day.



110. For residential developments in particular, more water efficient and sustainable measures are encouraged to help reduce water use further, to future-proof developments. Southern Water are championing [Target 100](#), supporting personal consumption reductions to achieve a 100 litre per person per day standard.
111. More efficient water fittings and appliances will help, provided they are not later replaced with less efficient systems. Wherever appropriate water use efficiency should be evaluated using the 'Fittings Based Approach' as set out in section 2 and Tables 2.1-2.2 of [Buildings regulations Approved Document G: Sanitation, hot water safety and water efficiency](#).
112. More enduring approaches could include rainwater harvesting (RWH) and grey water recycling (GWR) systems to reduce demand for treated mains drinking water for non-potable uses. The simplest example of rainwater harvesting is a water butt for garden watering and outdoor cleaning, connected to guttering downpipes. A roof of 60sqm (a typical terraced house) would receive around 5,000 litres rainfall per annum in Southern England. More sophisticated rainwater harvesting systems are encouraged, such as rainfall storage tanks integrated into plumbing systems for non-potable use (potable use may be possible where on-site treatment is practicable).
113. Greywater recycling is the re-use of wastewater from sinks, showers, baths, washing machines or dishwashers, usually for non-potable use: to flush toilets, wash clothes and water gardens or green spaces. About 70% of water used in the home is discharged as greywater, so unlike rainwater it is a seasonally consistent source of water for re-use. In-home re-use requires installation of a 'dual' plumbing system, which is most cost-effective to provide during construction.

Drought resilience in the public and private realm

114. To be self-sustaining and climate resilient, planting strategies for both public spaces and private gardens will need to consider both the warming climate and potentially available water. Equally, the design of the built environment and choice of drainage approach and mechanisms should ensure that naturally available water supports the green and blue infrastructure provided, now and in the future.
115. The alignment of green infrastructure and SUDs provision is an obvious opportunity to improve drought resilience. The default use of permeable materials for hard surfaces and bio-retention mechanisms such as rain gardens, swales and green roofs are recommended wherever practicable, to enable natural infiltration to support groundwater recharge as well as to reduce or slow drainage run-off. Scope to use runoff in SUDs or storage tanks for greenspace watering and public realm cleaning could also be explored if necessary e.g. in more urbanised contexts. Other useful resources include:
- Watersafe: [Developing Water Efficient Homes](#)
 - Waterwise: [Advice on Water Efficient Homes for England](#)

Reducing flood risk through Sustainable Urban Drainage (SuDS)

116. Changes to our climate are predicted to result in increased rainfall and greater risk of flooding, including from the inundation of existing drains not designed for current conditions.
117. National Planning Practice Guidance on [Flood risk and coastal change](#) was significantly updated in 2022, requiring that flood risks including surface water management is fully considered from the outset of the planning application and Local plan-making processes.
118. NPPG changes reflect the National policy position that 'major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be



inappropriate²². Integrating SuDS into a development can greatly improve the site's ability to capture, absorb and effectively retain water as part of a comprehensive green infrastructure design. Compared to the traditional approach of using underground pipes and tanks discharging to sewers to manage drainage, a surface-based SUDs approach can reduce total surface water run-off and support local drainage networks to function effectively, reducing the risk of flooding and untreated sewage discharges from overloaded sewers.

119. Where SUDs are provided, SUDs design should underpin the earliest stages of site masterplanning following the approach set out in the Construction Industry Research and Information Association (CIRIA) [SUDs Manual](#) (C753). The SUDs Manual explains how to maximise SUDs benefits for water quantity, water quality, amenity and biodiversity (the '4 pillars' of SUDs). The CIRIA approach treats surface water as a valuable resource that if appropriately managed can improve climate change resilience, enhance biodiversity, and add to the beauty and amenity of developments.
120. Provided that they are constructed in accordance with the SUDs Manual, water companies may formally adopt SUDs as part of the drainage network they manage. This is an outcome developers should actively pursue.
121. CIRIA guidance C808 [Using SuDS to reduce phosphorus in surface water runoff](#) (December 2022) explains how SUDs design can mitigate at source environmental impacts from phosphorus on the water environment. This approach addresses pollution impacts at source in accordance with the proximity principle, reducing the nutrient mitigation cost for the development. It should be followed for development in the Avon catchment. Additional funding is secured to extend this guidance to mitigating nitrogen runoff, and once published (anticipated mid 2023) this approach should be followed in Solent catchments.

Managing residual flood risks

122. NFDC considers that the updated NPPG approach and the requirements it places on developers to prepare flood risk assessments is now sufficiently precautionary to ensure early and more holistic consideration of water flood risks, including allowances for climate change²³. But that there will still be some residual risks in some locations from infrequent extreme events, and these need to be recognised and properly addressed in the design approach.
123. Where flood risks cannot be fully eliminated but development is on balance justified under national policy, the overall development design should include a strategy to safely manage (absorb, channel, contain or delay) flows that exceed the design capacity of the drainage system, including any SUDs, specified in accordance with CIRIA [Designing for exceedance in urban drainage](#) - good practice (C635F). This document provides best practice advice for the design and management of urban sewerage and drainage systems to reduce or mitigate the impacts that arise when flows occur that exceed their design capacity. Example measures could include the design of safe and resilient flood overflow routes and temporary flood storage areas.
124. Where necessary flood resilience should also be designed into buildings, following the CIRIA [Code of practice for property flood resilience](#) (C790A) e.g. measures such as raised floor levels, water barriers to building openings or the use of materials or siting of services that would reduce recovery time and cost if a building is flooded.

Supporting ecology and biodiversity

125. NFDC has declared a nature emergency as well as a climate emergency, as they are inextricably linked. Enhancing biodiversity and providing green and blue infrastructure is

²² NPPF para 169

²³ [Flood risk assessments: climate change allowances - GOV.UK \(www.gov.uk\)](#)



encouraged in new developments. It will help to increase the capacity of the environment to absorb CO₂ emissions in the local area. Maintaining and enhancing biodiversity and green infrastructure will also benefit occupants, the wider community and economy by supporting health and wellbeing, providing surface water management and flood resilience, absorbing pollutants improving local air quality, providing local shading and wider air cooling, as well as providing habitats for wildlife.

126. Since 2020 NFDC has sought a minimum of 10% biodiversity net gain as a requirement of planning permission for 'major' new build development (10+ homes, or at least 1,000 sqm of other development), pursuant to Local Plan **Policy STR1: Achieving Sustainable Development**. Further details are set out in the [Ecology and Biodiversity net gain - Interim Advice and Information Note](#). Updated guidance will be provided in a Biodiversity Supplementary Planning Document to follow during 2023.





Appendices



Appendix 1: Local Plan 2020 - climate change related policies

Policy STR1: Achieving sustainable development

All new development will be expected to make a positive social, economic and environmental contribution to community and business life in the Plan Area by

- v. Ensuring communities and workers are safe and feel safe, and the risks to people, places and to the environment from potential hazards including pollution, flooding and climate change effects are minimised;
- vi. Ensuring that new development is adaptable to the future needs of occupiers and future-proofed for climate change and innovations in transport and communications technology.

Policy ENV3: Design quality and local distinctiveness

... New development will be required to: ...

- v. Incorporate design measures that improve resource efficiency and climate change resilience and reduce environmental impacts wherever they are appropriate and capable of being effective, such as greywater recycling and natural heating and cooling, and the use of Sustainable Urban Drainage Systems (SUDS); ...

Policy CCC1: Safe and healthy communities

- iv. In the interests of public safety, vulnerable developments will not be permitted (a) Within the defined Coastal Change Management Area at Barton-on-Sea to Milford-on-Sea unless in accordance with Saved Policy DM6: Coastal Change Management Areas; (b) In areas at risk of flooding unless in accordance with the sequential and exceptions tests

Policy CCC2: Safe and sustainable travel

New development will be required to:

- i. Prioritise the provision of safe and convenient pedestrian access within developments, by linking to and enabling the provision of more extensive walking networks wherever possible, and where needed by providing new pedestrian connections to local facilities;
- ii. Provide or contribute to the provision of dedicated cycle routes and cycle lanes, linking to and enabling the provision of more extensive cycle networks and providing safe cycle routes to local schools wherever possible ...
- v. Incorporate infrastructure to support the use of electric vehicles ...

Policy IMPL2: Development Standards

New development will meet or exceed the following standards and requirements to help minimise their environmental impact and/or to be adaptable to the future needs of occupiers over their lifetime...

- ii. The higher water use efficiency standard in accordance with Part 36(2) (b) of the Building Regulations, currently a maximum use of 110 litres per person per day.
- iii. New commercial developments of 250 - 999 sqm gross internal area (GIA) are required to achieve Building Research Establishment Environmental Assessment Method (BREEAM) excellent standard in the water consumption criterion. Commercial development of 1,000 sqm or more GIA is also required to achieve BREEAM excellent standard overall.
- v. Provision of a high-speed fibre broadband connection to the property threshold.
- vi. Provision to enable the convenient installation of charging points for electric vehicles in residential properties and in residential, employee and visitor parking areas.

Saved Policy DM6: Coastal Change Management Area (CCMA)

[Defines an area where development is restricted due to erosion and land instability risks].




Appendix 2: Good Homes Alliance early stage overheating risk tool

127. The Good Homes Alliance website²⁴ provides guidance on use of the tool.

EARLY STAGE OVERHEATING RISK TOOL Version 1.0, July 2019

This tool provides guidance on how to assess overheating risk in residential schemes at the early stages of design. It is specifically a pre-detail design assessment intended to help identify factors that could contribute to or mitigate the likelihood of overheating. The questions can be answered for an overall scheme or for individual units. Score zero wherever the question does not apply. Additional information is provided in the accompanying guidance, with examples of scoring and advice on next steps. Find out more information and download accompanying guidance at goodhomes.org.uk/overheating-in-new-homes.



KEY FACTORS INCREASING THE LIKELIHOOD OF OVERHEATING		KEY FACTORS REDUCING THE LIKELIHOOD OF OVERHEATING	
Geographical and local context			
#1 Where is the scheme in the UK? <small>See guidance for map</small>	South east	4	
	Northern England, Scotland & NI	0	
	Rest of England and Wales	2	
#2 Is the site likely to see an Urban Heat Island effect? <small>See guidance for details</small>	Central London (see guidance)	3	
	Grtr London, Manchester, Bham	2	
	Other cities, towns & dense sub-urban areas	1	
Site characteristics			
#3 Does the site have barriers to windows opening? <small>- Noise/Acoustic risks - Poor air quality/smells e.g. near factory or car park or very busy road - Security risks/crime - Adjacent to heat rejection plant</small>	Day - reasons to keep all windows closed	8	
	Day - barriers some of the time, or for some windows e.g. on quiet side	4	
	Night - reasons to keep all windows closed	8	
	Night - bedroom windows OK to open, but other windows are likely to stay closed	4	
#8 Do the site surroundings feature significant blue/green infrastructure? <small>Proximity to green spaces and large water bodies has beneficial effects on local temperatures; as guidance, this would require at least 50% of surroundings within a 100m radius to be blue/green, or a rural context</small>		1	
#9 Are immediate surrounding surfaces in majority pale in colour, or blue/green? <small>Lighter surfaces reflect more heat and absorb less so their temperatures remain lower; consider horizontal and vertical surfaces within 10m of the scheme</small>		1	
#10 Does the site have existing tall trees or buildings that will shade solar-exposed glazed areas? <small>Shading onto east, south and west facing areas can reduce solar gains, but may also reduce daylight levels</small>		1	
Scheme characteristics and dwelling design			
#4 Are the dwellings flats? <small>Flats often combine a number of factors contributing to overheating risk e.g. dwelling size, heat gains from surrounding areas; other dense and enclosed dwellings may be similarly affected - see guidance for examples</small>		3	
#5 Does the scheme have community heating? <small>i.e. with hot pipework operating during summer, especially in internal areas, leading to heat gains and higher temperatures</small>		3	
#11 Do dwellings have high exposed thermal mass AND a means for secure and quiet night ventilation? <small>Thermal mass can help slow down temperature rises, but it can also cause properties to be slower to cool, so needs to be used with care - see guidance</small>		1	
#12 Do floor-to-ceiling heights allow ceiling fans, now or in the future? <small>Higher ceilings increase stratification and air movement, and offer the potential for ceiling fans</small>	≥2.8m and fan installed	2	
	> 2.8m	1	
Solar heat gains and ventilation			
#6 What is the estimated average glazing ratio for the dwellings? <small>(as a proportion of the facade on solar-exposed areas i.e. orientations facing east, south, west, and anything in between). Higher proportions of glazing allow higher heat gains into the space</small>	>65%	12	
	>50%	7	
	>35%	4	
#7 Are the dwellings single aspect? <small>Single aspect dwellings have all openings on the same facade. This reduces the potential for ventilation</small>	Single-aspect	3	
	Dual aspect	0	
#13 Is there useful external shading? <small>Shading should apply to solar exposed (E/S/W) glazing. It may include shading devices, balconies above, facade articulation etc. See guidance on "full" and "part". Scoring depends on glazing proportions as per #6</small>			Full Part
	>65%	6	3
	>50%	4	2
	>35%	2	1
#14 Do windows & openings support effective ventilation? <small>Larger, effective and secure openings will help dissipate heat - see guidance</small>			Openings compared to Part F purge rates
		= Part F	+50% +100%
	Single-aspect minimum required	3	4
Dual aspect	2	3	
<p>TOTAL SCORE <input type="text"/> = Sum of contributing factors: <input type="text"/> minus Sum of mitigating factors: <input type="text"/></p>			
<p>High 12 Medium 8 Low</p>			
<p>score >12: Incorporate design changes to reduce risk factors and increase mitigation factors AND Carry out a detailed assessment (e.g. dynamic modelling against CIBSE TM59)</p>		<p>score between 8 and 12: Seek design changes to reduce risk factors and/or increase mitigation factors AND Carry out a detailed assessment (e.g. dynamic modelling against CIBSE TM59)</p>	
<p>score <8: Ensure the mitigating measures are retained, and that risk factors do not increase (e.g. in planning conditions)</p>			

²⁴ <https://goodhomes.org.uk/wp-content/uploads/2019/07/GHA-Overheating-in-New-Homes-Tool-and-Guidance.pdf>



Appendix 3 Case studies for new build

Ultra low energy design is fast becoming the new normal

128. The energy efficiency of new homes is increasing year on year. Many self-builders and developers go beyond building regulations for energy efficiency because it makes sense. Not only can low energy building be cheaper to run, they can be easier and cheaper to maintain and crucially, will not need further expensive retrofit in the future.

Beautiful and efficient homes

129. Lark Rise in the Chiltern Hills is certified to Passivhaus Plus standards. It is entirely electric, and generates 2.5 times as much energy as it consumes in a year. Carefully optimised design has meant that it has a mostly glazed facade, minimal heat demand and stable temperatures over summer months.

Passivhaus/Ultra-low energy can be delivered at scale

130. Developers are building Passivhaus at scale. At the lower end Hastoe's development at Wimbish, Essex is a mixture of 14 houses and flats, certified to Passivhaus standards. The average heating costs for the houses are £130/year (2020). The development is operating as designed and has effectively eliminated the 'performance gap'.

131. Other examples include Springfield Meadows in Oxfordshire and Agar Grove in Camden. At nearly 500 homes [Agar Grove estate regeneration](#) in Camden, London, will be the largest Passivhaus development in the UK once completed. Phase 1A is occupied.



Lark Rise, Chiltern Hills. Passivhaus Plus certified. (Source: Bere:architects)



Springfield Meadows (Source: Greencore construction with Bioregional)



Wimbish, Passivhaus certified. (Source: Hastoe Housing Association)



Appendix 4: What to do when? Checklist for design and construction

RIBA Stage 2 & 3

RIBA Stage 2 - Concept Design	✓	RIBA Stage 3 - Spatial Coordination	✓
Optimise building orientation to balance solar gain and increase south facing roof area. Design roof to maximise density of renewables.		Review mark-up of insulation line on all plans and sections and carry out initial U-value calculations.	
Calculate and report the building form factor for design options.		Carry out heating options appraisal including a low carbon option.	
Arrange embodied carbon workshops with design team to target lean design principles and reduce big tickets items e.g. structure.		Hold a thermal bridge workshop. Include the structural engineer for review of columns, masonry support etc.	
Identify design team members to carry out embodied carbon assessment. Carry out multiple embodied carbon calculations of key elements to demonstrate low carbon design choices.		Provide MVHR layout including duct distribution and measurement of intake and exhaust duct lengths to external walls for sample dwellings.	
Mark-up insulation line on all plans and sections. Mark unheated external areas on plans.		Carry out full embodied carbon assessment of whole building and compare against embodied carbon target. Implement reductions where necessary.	
Allow sufficient wall construction thickness for all insulated walls, roofs and floors.		MEP consultant to review embodied carbon impact of services and reduce the amount of kit where possible. Use CIBSE TM65 embodied carbon in building services to assess impact.	
Mark window openings for providing natural ventilation for summer comfort.		Carry out PHPP modelling alongside SAP calculations. List all model assumptions including U-values, thermal bridges and system specifications etc.	
Identify a location for the MVHR next to an external wall.		Carry out overheating assessment and eliminate overheating through passive strategies where possible (TM59). Ensure all element assumptions match PHPP and SAP models.	
Carry out preliminary overheating risk assessment using the Good Homes Alliance overheating checklist.		Calculate electricity generation intensity of PV arrays and review against KPI.	
Carry out initial PHPP model.		Define airtightness strategy and identify airtightness line on plans and sections.	
For projects using Passivhaus certification this is a good time to consider an appointment.		Measure heating and hot water pipe lengths for sample dwellings. Minimise distribution or standing losses.	
		Demonstrate distribution losses have been calculated and reduced.	
		Prepare RIBA Stage 3 report and include predicted operational cost to tenant.	

MVHR: Mechanical Ventilation with Heat Recovery

PHPP: Passivhaus Planning Package

This design checklist provides a list of key actions that should be carried out at each work stage to meet the KPI targets for new homes.

This should be shared with the design team to check off after each stage is complete.



Checklist for design and construction: RIBA Stage 3+, 4,5 & 6

RIBA Stage 3+ - Early Technical Design (and tender)		✓
Detail build-ups of all external elements including thickness and conductivity of all materials.		
Detailed U-value calculations (including masonry support system, etc.).		
Identification of all thermal bridge junction types (e.g. parapet A, parapet B).		
Thermal bridge calculations for a selection of the most important junctions.		
Definition of airtightness testing requirements for contractor.		
Include requirements for Environmental Product Declarations (EPD) in the tender. Make EPDs obligatory for structural materials, primary façade and any other major materials.		
Include KPI requirements in the tender.		
Agree scope of Post-Occupancy Evaluation in tender. Identify level of participation from contractor and design team.		
RIBA Stage 4 - Technical Design (in addition to Stage 3+)		✓
Develop junction details for window and doors.		
Review airtightness line on each drawing and identification of airtightness requirements for service penetrations.		
Carry out a thermal bridge workshop to review thermal bridge lengths and calculate Psi-values for all junctions.		
Review MVHR layout including duct distribution and measurement of length of intake and exhaust ducts for all homes.		
Measure heating and hot water pipe lengths for all communal areas and homes.		
Carry out embodied carbon assessment of whole building using accurate Bills of Quantities.		
Specify high performing PV panels.		

RIBA Stage 5 - Manufacturing and Construction		✓
Run an introduction to ultra-low energy construction workshop on-site.		
Encourage site manager and team training on construction quality requirements covering insulation and airtightness.		
Prepare toolbox talk information for site team inductions on low energy construction quality.		
Review alternative materials or products proposed by the contractor. Ensure substitutions do not compromise the thermal performance or embodied carbon target.		
Carry out regular construction quality assurance site visits and reports (depending on the size of the scheme – at least six) in tandem with regular visits.		
Develop site quality tracker, assess against KPIs and update regularly.		
Require leak finding airtightness tests at first fix and second airtightness test pre-completion.		
Witness commissioning of MVHR systems and heating system.		
Carry out predicted in-use energy model of each building leading to the final 'as built' PHPP model.		
Consider recalculating embodied carbon using 'as built' information.		
RIBA Stage 6 - Handover		✓
Provide building and operational information to residents in the form of site inductions and simple building user guides and instructions (e.g. sticker on MVHR for filter replacement).		
Consider embodied carbon as part of the replacement and maintenance strategy and include in the O&M manual.		
Carry out post-occupancy evaluation during first 5 years of use and verify KPIs have been met.		
Lessons learnt project review with design team.		
Publicly report KPIs.		





Separate Companion Document

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