



# worcestershire county council

Strategic Planning – Bromsgrove District Council  
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31<sup>st</sup> March 2021

BY EMAIL

Dear Strategic Planning team,

## **Catshill and North Marlbrook Neighbourhood Plan: Regulation 16 Consultation**

Worcestershire County Council welcomes the opportunity to respond to the above consultation. Provided below are officer-only comments from our Highways and Sustainability teams. Please note that the Sustainability comments are the same as those submitted in response to the Regulation 14 consultation.

If you wish to discuss these comments please do not hesitate to get in touch.

Yours faithfully,

Strategic Planning and Environmental Policy Team

### **Strategic Planning and Environmental Policy**

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## Highways

All development should adhere to the guidelines set out in the Worcestershire Streetscape Design Guide.

All new community facilities should be accessible by walking / cycling and have pedestrian links from key residential areas.

All new residential sites over 6 dwellings must provide a Travel Information Pack promoting sustainable modes of travel. (see Design Guide for details).

All new residential sites over 50 dwellings must also produce a Travel Plan and provide personalised travel planning (see Design Guide for details).

All new employment sites should include cycle parking (see Design Guide for details).

All new employment sites that require a Transport Statement must also produce a Travel Plan (see Design Guide for details).

## Sustainability

### Climate Change

Climate change mitigation and adaptation are central to the National Planning Policy Framework (NPPF). The UK Climate Change Act 2008 sets legally binding targets for the UK to reduce carbon emissions to net zero by 2050. New developments will be around for a considerable number of years, it is important that they remain fit for purpose over their lifetime as the climate changes. We are encouraged to see the inclusion of climate change within the NP (10.8 – Climate Change and Water Management). We are fully supportive of all adaptation measures listed in 10.8.2, which align with Bromsgrove District Plan (BDP) Policy 22 – Climate Change.

With regard to sustainable design and construction, the NP could cross-reference to the BDP to support further action within this area:

### **BDP - Sustainable Design and Construction**

**8.195** One of the purposes of the planning system is to contribute to the achievement of sustainable development. Using sustainable design and construction techniques ensures that the environmental impacts of buildings are minimised as far as possible. Buildings of all types and sizes have the potential to reduce their impact on the environment, including by minimising their contribution to climate change and by using less resources. This also includes the use of sustainable building materials having regard to sourcing materials in a responsible way and use of

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materials which have a low embodied impact over their life including extraction, processing, manufacture and recycling.

**8.196** BREEAM is a widely adopted tool for rating and measuring the sustainability performance of non-domestic buildings. For non-residential development, the Council expects development to meet the BREEAM 'very good' standard.

### Energy

We are supportive of Policy 'H3 - New housing should be designed to appropriate sustainability and design standards, including energy efficient construction, consistent with the principles established in the Design Guide study undertaken for this Plan'. Policy ENV8 in the NP states: 'New development should deliver a high level of sustainable design and construction being optimised for energy efficiency to achieve zero or very low carbon emissions'...'It is important that developments should, as a minimum satisfy national standards and, ideally, seek to achieve as close as possible, zero carbon emissions'.

The BDP SO10 encourages new developments to be low or zero carbon, with BDP22 (Climate Change) calling for 'developments to incorporate zero or low carbon energy generation technologies'. However, there could be more stretching targets proposed within the NP to achieve energy efficiency and further support installation of renewable energy to achieve low/zero carbon development.

The plan could request that energy efficiency of new homes goes beyond the standards required in building regulations which would be in line with the National Planning Policy Framework. Improving the energy efficiency standards of new homes will help to support achievement of national net zero carbon targets and reduce the risk of fuel poverty for new residents.

It would be encouraging to see recognition of the issue of fuel poverty within the Neighbourhood Plan. The latest figures show that 10% of households in Worcestershire are considered to be fuel poor, meaning they have high energy costs but a low household income.

### Ultra Low Emissions Vehicles (ULEV)

There is limited reference to supporting the inclusion of electric vehicle chargepoints in new developments in the NP. BDP16.3 states that 'The Council will support the use of low emission vehicles including electric cars through encouraging the provision of charging points in new developments'.

The 'Road to Zero' strategy produced by the UK Government outlined the intention to consult on proposals for all new UK homes to have an electric vehicle charge point where appropriate. This consultation concluded October 2019 – currently awaiting response from Government.

### Water Efficiency

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The NP could consider improvements to water efficiency in new homes and non-residential developments over and above building regulations, including the provision of water butts (residential).

#### Waste, Composting and Food Growing

The NP makes no reference to waste, supporting the segregation of waste for recycling, or ensuring infrastructure and access for waste collections. The plan could consider options for onsite composting for new homes, including provision of compost bins for all new homes.

The plan could consider inclusion of provision of allotment and growing space in suitable locations.

#### Low Carbon Neighbourhood Planning Guidance

For further guidance related to low carbon neighbourhood planning:

<https://www.cse.org.uk/downloads/reports-and-publications/policy/planning/renewables/neighbourhood-planning-in-a-climate-emergency-feb-2020.pdf>

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