



worcestershire county council

Ask for: Natasha Friend

To: Head of Planning, Wychavon District Council

Date: 30 June 2021

From: Strategic Planning and Environmental Policy Manager

Subject: **Norton-juxta-Kempsey Neighbourhood Development Plan –
Consultation Draft Regulation 16**

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Introduction

Worcestershire County Council welcomes the opportunity to comment on the above consultation. The following officer-only response is from our Historic Environment, Sustainability and Transport Policy Teams other Worcestershire County Council teams may choose to make their own response.

Historic Environment

From a Historic Environment perspective we note that our comments dated November 2020 have been noted as part of the parishes response to the Regulation 14 consultation. We would once again recommend that the Worcestershire Farmsteads Assessment Framework is referenced as part of Policy NJK9 Agricultural Buildings and Rural Employment (alternatively the [National Assessment Framework](#) could be referenced, for which Worcestershire was a pilot).

Sustainability

With regards to NJK10 Housing development policy we would like to make the following comments from a Sustainability perspective, the plan could go further with the housing development policy to outline the standard of homes expected from any development.

The Plan could consider the long-term affordability for running the dwelling, not just the initial purchase cost. With rising energy costs and nearly 10% of Worcestershire residents living in fuel poverty, advocating ultra-energy efficient building design could help to keep residents' fuel bills low and minimising the likelihood of them falling into fuel poverty. Government policy is directing households away from fossil fuels such as oil and gas towards low carbon and renewable energy sources such as electric heating.

Current Government policy in regards to energy efficiency only requires developers to meet building regulations. The Neighbourhood Plan could express support for going beyond these building regulations to build ultra-energy efficient homes, for the benefit of residents and to reduce environmental impact. Ultra-energy efficient building design should make good financial sense as well as reducing carbon emissions.

Developments can be encouraged to promote energy efficiency and for commercial or public buildings to comply with BREEAM's Excellent or Outstanding rating.

The Plan could cite the SWDP Supporting Planning Document (SWDP 27) which states that new developments of certain sizes should incorporate 10% on-site renewable energy generation. If the neighbourhood decided this was particularly

important, the SWDP 27 policy could be enhanced – for example to 15% or 20% on site renewable energy generation.

The NPPF states that local planning authorities “should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources...They should support community-led initiatives for renewable and low carbon energy”. Worcestershire County Council is keen to see community energy schemes develop and to encourage such schemes. See

http://www.worcestershire.gov.uk/info/20235/sustainability/1167/community_renewable_energy. The Department for Energy and Climate Change's Community Energy Strategy should be considered

(<https://www.gov.uk/government/publications/community-energy-strategy>).

Community energy schemes will improve energy security, meaning that a community is not fully dependent on outside energy sources, can generate vital revenue for a community which can be used for other community projects and initiatives, and will reduce the carbon emissions from a community.

Community renewable energy could therefore be supported within the neighbourhood plan. This could consider low carbon energy sources, (such as renewable energy e.g. ground, air or water source heat, solar PV etc.), and opportunities for community energy generation etc., perhaps within the neighbourhood's policy on design of new buildings.

With legislation changes banning the sale of new petrol and diesel vehicles from 2030 in favour of electric vehicles it will become increasingly important for new homes to be equipped with the ability to charge the vehicles. Domestic chargepoints should be considered as a requirement for new developments. The location of the charging should also be considered so the vehicles can be charged safely.

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>

Transport Policy

For a Transport Policy perspective, we make the following comment that all development should adhere to the guidelines set out in the Worcestershire Streetscape Design Guide.