

ENVIRONMENT Policies CP 11 – CP14
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ISSUE 9

Issue i) Policies consistent with NPPF, clear & evidence based?

These policies are consistent in particular with the NPPF 17 and 93 relating to carbon emissions and renewable energy.

The policies are not all clear for the reasons set out below.

No supporting evidence has been provided to the Inquiry but we consider the various national and ultimately international targets expected to be met fulfil the same purpose.

Issue ii) CP11 (p107) renewable energy targets appropriate, reasonable, realistic?

Change title to *“Sustainable built Development”* Includes water conservation as well as carbon emission efficiency by means of thermally efficient structures and use of renewable energy.

Amend first paragraph to include *“The expected carbon emission levels are set by the rolling Climate Change Act 2008 targets to 2050 and are accordingly subject to change.”*

In the hierarchy interchange 2 and 3 to maximise on site potential before drawing on potential elsewhere.

Issue iii) CP12 (p108) right balance between protecting environment and facilitating strategic development of renewable & decentralised energy?

CP12 is conflicting. The initial text refers to “CHP/district heating /cooling systems and the development of larger scale ... “ but the rest only relates to “large scale” schemes. Smaller schemes are covered by CP11. Amend to read “It will support the creation of CHP/district heating/cooling systems and the development of larger-scale renewable energy developments *servicing more than one community or allocated site.*”

Issue iv) CP13 (p110) High quality design reasonable, realistic & appropriate?

Bullet 2 amend to read “walking, and cycling *and public transport* routes”

“to *enhance their usability encourage their use*”.

Add new bullet: *“How sustainable connectivity and effective use of land has been maximised.”*

Issue v) CP14 (p111) Effective use of land reasonable, realistic & appropriate?

“Higher densities within urban areas” lacks meaningful definition.

Omit “within urban areas” as inside and outside this vaguely defined area is protected by the “general character of the area”.

Specify “Higher” as *“In the most sustainable locations net densities of at least 50 dwellings/Ha will be supported. In developments with on-site open space (CP15) gross densities of at least 30/Ha will be supported”*.

“... general character of the area will be the final determinant ...” A major component of “general character” is its existing density and making this the “final determinant” largely precludes any increase. Delete. Protected by CP13 and CP15.