

THE PLAN FOR STAFFORD BOROUGH - EXAMINATION
MATTER 9. ENVIRONMENT (Policies N1-N9)

Inspector's Matters, Issues and Questions in bold text.

Key issue: Does the Plan provide an appropriate, effective and soundly based framework for protecting, maintaining and enhancing the high quality environment within Stafford Borough, including design, climate change, renewable energy and the natural and historic environment, including landscape and sites of nature conservation importance, particularly Cannock Chase SAC & AONB, which is fully justified with evidence and consistent with national policy?

9.1 DESIGN, CLIMATE CHANGE AND LOW CARBON SOURCES & RENEWABLE ENERGY (Policies N1-N3)

- a. How will the principles set out in Policy N1 effectively secure enhancements in design quality in new developments, including use, form, space and movement?**
- b. How will the criteria and requirements set out in Policy N2 effectively facilitate a reduction in the consumption of natural resources, improve environmental quality and mitigate the impact of climate change?**
- c. Are the requirements in Policies N1 & N2 to comply with specific standards and codes unduly onerous and unnecessary, particularly in view of the Government's recent consultations on the review of housing standards and zero carbon homes?**

Since the Stafford Borough Plan was prepared and submitted for examination, on 30th July 2013 a Written Ministerial Statement on changes to requirements under Part L of the Building Regulations (conservation of fuel and power) has been issued and in August 2013, the DCLG launched two consultations on "Housing Standards Review" and "Next Steps to Zero Carbon Homes – Allowable Solutions".

In the introduction to the "Housing Standards Review" the Government comments that "the house building process is difficult in itself, but it is not assisted by the large and complex range of local and national standards, rules and codes that any developer has to wade through before they can start building (Paragraph 1). Most housing standards are imposed voluntarily by local planning authorities, through local plan policies and as planning conditions applied to permissions, as they deem fit (Paragraph 2). Although the local application of standards can be an important expression of local planning aspirations and can encourage local innovation, they are often complex and overlapping, and can even contradict each other or even parts of national Building Regulations. Cumulatively they can be difficult to understand (Paragraph 4). It is also often unclear which part of an authority is responsible

for checking whether standards have been met, and what it is they are checking. The overall effect is that standards can add considerably to development costs, project delay, local authority bureaucracy, and put a brake on growth (Paragraph 5)".

These documents provide a useful insight into current Government thinking especially in view of Policies N1 and N2 of the Stafford Borough Plan, which are unduly onerous and unnecessary. One matter the Government is consulting on is the proposal to phase out the Code for Sustainable Homes (CfSH), therefore the Council should consider deleting reference to the Code from its policies and supporting text.

As previously stated in our original representations to the Submission version of the Stafford Borough Plan and discussed under Matter 8, the Council's viability assessments do not provide sufficient cost allowances for CfSH or Lifetime Homes.

Similarly as previous representations commented satisfactory compliance with the requirements of voluntary best practice guides such as Building for Life 12 and Secured By Design are not always compatible.

The third paragraph of Policy N2 under Sustainable Construction is not aligned with the latest consultation on allowable solutions. Allowable solutions arise from the obligation for house builders to mitigate the carbon emissions arising from regulated energy. Under Paragraphs 2.4 (a) and (b) of the consultation document, the Government proposes a set of basic design principles for allowable solutions stating that *"it is right that house builders decide how they meet that obligation and should not have this dictated to them. Flowing from this, the Government wishes to develop a framework which gives house builders choice and flexibility"*. This third paragraph seems to be dictating to developers the way in which energy requirements will be met. The Council should re-consider the Policy.

Susan E Green MRTPI
Planning Manager – Local Plans