

Submission Responses

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2. Are there any additional plans, policies or programmes that are relevant to the SA/ SEA that should be included? (Optional)

Some of the policy base seems out-of-date and no longer relevant. We suggest the following could be deleted from the lists in Ch 2, Appendix A, and the References - The Promotion of the Use of Energy from Renewable Sources Regulations (2011) Reason: these are revoked - The UK Low Carbon Transition Plan: National Strategy for Climate and Energy (2009) and The UK Renewable Energy Strategy (2009). Reason: These 2009 white papers pre-date the 100% carbon reduction (net zero) target. Their targets (mainly for 2020) have been superseded or revoked. - Water White Paper (2012) and Future Water: The Government's Water Strategy for England (2008). Reason: Both are now out of date. Possible replace with the 2023 Plan for Water Here are three specific cases where the policy base is now more nuanced or has moved on: 1 Future Homes and Clean Power The Planning and Energy Act 2008 allowed LA's to set their own standards for renewables and for building energy performance. The Act predates the 2019 commitment for Net Zero, and reflects the mid-2000's more limited commitment that new homes would be net Zero Carbon by 2016. This was to be achieved by a mix of fabric and tech upgrades, and by offsite 'allowable solutions'. Gas, with its inevitable CO2, was the assumed fuel. Future Homes is a more radical approach, and supersedes it. It comes from the national commitment in 2019 to mandate the end of gas boilers in new homes by 2025. Thus, the all-electric homes built under Part L 2025 ('Future Homes') will await the not-too-distant arrival of a fully decarbonised grid, and are 'zero-carbon-ready'. See The Future Homes and Buildings Standards: 2023 consultation - GOV.UK <https://www.gov.uk/government/consultations/the-future-homes-and-buildings-standards-2023-consultation> As a result, the 2023 Written Ministerial Statement discourages local energy efficiency standards that go beyond current or planned buildings regulations. See: Planning - Local Energy Efficiency Standards Update: Written Ministerial Statement 13 Dec 2023. <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hcws123> NB While the 2008 Act still stands, it requires any local policies to be not inconsistent with national policies (and we suggest that final publication of Part L 2025 is likely to lead to its revocation). The same approach to local plans is found in NPPF 2024, which emphasises, under Planning for Climate Change, that Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards. Rapid progress has already been made on grid decarbonisation. Witness the huge drop in electricity's assumed carbon content, from 519 g / kWh in 2012 to just 86 g in 2025, in SAP. See the new government's Clean Power 2030 Action Plan. We suggest Ch 2 quotes these links to Future Homes and Part L 2025, to the 2023 WMS and on grid decarbonisation, to the Clean Power Action Plan.

<https://www.gov.uk/government/publications/clean-power-2030-action-plan> (NB References on p 131 to the Prime Minister's - Boris Johnson's - 10 Point Plan might also need updating.) Finally, we feel the SA text at para 2.37 should surely be updated to reflect this national policy change - by referring to Future Homes, and by deleting reference to promoting local policy options, such as fixed percentages of renewables, HQM or BREEAM schemes, more stretching requirements, and indeed to the New Homes Policy Playbook which is quite out-of-date. The WMS is quite plain about the form of and tests for any local policy. 2 Electric Vehicles The 2030 ban on sales of non-electric new cars means that by the end of the plan period, the national fleet will be predominately electric. This affects local plans in two areas: - Charge point policy. At the national level, Part S of the Building Regs, now mandates charge points for new homes and non-residential buildings. This reduces the scope and or need for a local plan policy on charge points. Many LPA's have now dropped planning policies for charge points for new homes. The issue is the stock. Approved Document S:

Infrastructure for the charging of electric vehicles

https://assets.publishing.service.gov.uk/media/6218c5d38fa8f54911e22263/AD_S.pdf - Air quality policy. Poor air quality in Luton is mainly from traffic. But the assumption, growth means traffic means pollution, may not apply in future: the switch to EV's promises significant NO2 and PM reductions. The electrification of heat will also contribute to less boiler NOx. This deserves a mention, albeit we couldn't find any air quality forecasts. (There is national historic data aplenty, here and here, which shows significant progress on pollutant reduction). Forecasts might throw light on the need for any local policy, versus reliance on national progress. 3 Water Efficiency Standards. Since the last amendment to Building Regulations Part G, which brought water usage within scope, Government has discouraged any other standard in local plans than the optional, lower 110 litre standard in Part G. We suggest the SA might refer to Approved Document G: Sanitation, hot water safety and water efficiency

https://assets.publishing.service.gov.uk/media/66f6c6ce3b919067bb4828cc/ADG_with_2024_amendment_s.pdf

3. Is the baseline information provided robust and comprehensive? (Optional)

3.6 refers to Urban Heat Island Effect. Given the stress on overheating in the NPPF (para 162), and its potential for harm, the data does seem poor. From studying the Met Office data at Rothamsted (rural, five miles away), and the work commissioned by Greenpeace, and other sources, it seems the evidence we have is (a) quite granular if incomplete, for vulnerability, namely ward-level, and but (b) very coarse for the actual temperatures, namely Met Office 10 km grids. Is there evidence of the UHI effect in Luton? If so, where exactly, and how severe and frequent is it now, or will be in the future? We need some answers before proceeding to policy. It would also be prudent to refer here to Part O of the Building Regs, which was introduced in 2021 to reduce overheating in new homes, without mechanical ventilation or aircon; and was also reviewed in 2024, eg whether it should extend to conversions. We mention this in case the LPA should feel that planning policy on building specification is necessary to address overheating, rather than via built form or urban design. Overheating: Approved Document O - GOV.UK

<https://www.gov.uk/government/publications/overheating-approved-document-o>.

9. Do you have any specific comments to make in relation to the contents of the SA / SEA scoping report? (Optional)

Picky points: Surrounding Development Plans in Appendix A maybe needs updating. St Albans DC (A 169) has now submitted its Reg 19 plan for examination, and Dacorum BC (A168) is likely to do the same before 12 March 2025. The Reference list contains a lot of duplicates.

Would you like to be notified of future updates on planning policy matters, including a new local plan for Luton? (Required)

Yes