

**BATH AND NORTH EAST SOMERSET - CORE STRATEGY EXAMINATION**

**AGENDA - ISSUE 5: CLIMATE CHANGE**

**Participants to note: *This session is currently programmed for Tuesday 31 January. I expect the session will be fairly short. If the deferred discussion on the Bath Flood Compensation Scheme takes place on 1 February, the climate change hearing is likely to be in the afternoon of Tuesday 31 at 2.30pm. Please check with the Programme Officer.***

1. In relation to policy CP2 the Council's statement (BNES/13, 12.1.4) has expanded on the justification for the imposition of local construction standards (ie imposing specified Code/BREEAM levels).

- Does this justification adequately explain the local circumstances that warrant and allow the imposition of a local standard (as required by the supplement to PPS1 Planning and Climate Change paragraphs 29-33)?
- If the wording of draft NPPF in relation to climate change (eg paragraph 150) were to become national policy before the close of the Examination, would the test for justifying the policy change and would policy CP2 be justified?
- Given that prior to 2016 the Council is not seeking to impose tighter standards in relation to energy efficiency than are expected to be imposed by the Building Regulations, how does the imposition of specific Code levels support adaptation to climate change/mitigation of greenhouse gases?
- Have the additional costs of going beyond Code 3 been assessed for the local impact on viability?

2. Is the requirement in policy CP2 for major development to submit a BREEAM/Code pre-assessment with a planning application justified in principle and practical in operation, without imposing an unnecessary burden/cost? (Council to respond to the specific concern raised in the statement by RPS on behalf of Crest Strategic Rep 248.)

3. Is policy CP4 (District Heating) justified?

- Why does the policy apply to 15 areas (as identified in the Core Strategy) when the most direct supporting evidence (CD4/S1-S5) identifies only 3 *most promising opportunities* (p4) and identifies viability or other technical difficulties elsewhere.
- Has the Council assessed the viability impact of a development having to install district heating infrastructure where there is no operational system to connect to and undertake additional work to achieve the Council's sustainable construction requirements?
- If the policy is justified in principal, does the wording of the plan adequately reflect the range of circumstances to which it might apply and the flexibility which may be required?

**Simon Emerson  
Inspector, 12 January 2012**