

## Reading Local Plan EIP

### Matter 4: Cross Cutting Policies

*Issue 1: Are the cross-cutting policies justified, effective and consistent with national policy?*

4.1 Is Policy CC1 necessary given that the presumption in favour of sustainable development is set out in national policy?

HBF did not comment on this policy but given that it simply seeks to repeat national policy it is not clear what it adds to the plan that would aid decision makers.

4.2 Is the LPPU positively prepared in respect of climate change? Having regard to Policies CC2, CC3, CC4 and other policies within the LPPU, would the LPPU be consistent with national policy and legal requirements in relation to climate change?

HBF's main concern is that the approach set out in the CC2 and H5 are not consistent with national policy as set out in the NPPF and Written Ministerial Statement (WMS) from December 2023 on Local Energy Efficiency Standards. It is also notable that the latest consultation on the NPPF proposes to amend the Planning and Energy Act 2008 in relation to the setting of local energy efficiency standards that go beyond building regulations as well as stating in policy PM13 that Council's should not set standards beyond building regulations. HBF recognise that for this examination very little weight can be attached to these at present, but it does provide an indication as to the Government's position with regard to setting technical standards in local plans.

4.3 Is Policy CC2's approach justified and effective and is the approach, which seeks to set local energy efficiency standards, consistent with national policy and evidenced by a robust, up-to-date and locally relevant evidence base?

As set out in our representations HBF do not consider local energy efficiency targets based on energy demand, as is being proposed in CC2 and in H5, to be consistent with the WMS on Local Energy Efficiency Standards. These rely on energy use intensity and space heating standards that are not used in building regulations as well as being inconsistent with the requirements in the WMS to use the Total Emission Rate (TER) if a standard is to be set.

If a standard is to be included, it must not make development unviable or impact on the supply of new homes or the affordability of those homes. Therefore, a key part of any justification is the viability assessment. The Council's consultants state in Appendix 5 of the Local Plan Testing Report that they have applied a 15% uplift to take account of all the standards set out in H5 of the local plan. With regard to the local energy efficiency standards being proposed the cost assumptions are not based on local evidence but relates to evidence produced to support the local plans of

18 London Boroughs. The costs of meeting these standards range from £8,000 to £16,000 (between 6% and 8% of base build costs in London). However, is notable that research by the Future Homes Hub indicates that achieving similar levels of energy efficiency would increase costs of building an end of terrace house of between £17,000 and £21,000 compared to the current building regulations adopted in 2021<sup>1</sup> - an increase of between 15% and 19% on assumed build costs in that study. As such HBF are concerned that the Council have underestimated the costs of meeting what is being proposed.

However, the Council should not only consider whether this will impact on viability of development but also the ability of the development industry and its supply chains to deliver standards that are significantly higher than building regulations. HBF could find no such considerations in the Council's evidence. As with any change in technical standard it will take time for the industry to consider the new standard, how these can be met and the skills. Need to deliver those standards. If these are not available, then the supply chains will need to be developed and workforce upskilled. This takes time delaying the delivery of homes in the short term. While it may be theoretically possible to deliver homes to these standard there is no consideration as to whether they can be delivered from the point at which the plan is adopted. This is one of key reasons why HBF advocate improvements in technical standards should be delivered through building regulations as it allows the development industry and its supply chains to work together to meet one standard rather than creatin confusion that arises from meeting different standards in different areas.

As outlined above the Government have signalled in the latest NPPF consultation<sup>2</sup> that the intention is to prevent individual councils from setting technical standards outside of those relating to accessibility, water efficiency and space standards that are currently allowed for through the optional technical standards due to the difficulties placed on the construction industry from varying standards. While this is still only a consultation document and as yet has no weight, should it be adopted then the Council's approach would be inconsistent with this policy.

4.4 Is Policy CC2 clearly written and unambiguous? Is it clear to both the decision-maker and the applicant what will be required of them in meeting Policy CC2 for different types of development? When read in tandem with Policy H5 on energy efficiency for residential development, is it clear how both policies will work together?

CC2 lacks clarity as to how it relates to residential development. CC2 would appear to focus primarily on non-residential development and conversions to residential with H5 on standard for new housing is the opening paragraph. It should be clear as to what elements of CC2 apply to residential development or if these are addressed solely within H5.

4.5 What is the evidential basis for applying Policy CC2 to the redevelopment and refurbishment of existing building stock?

For Council.

4.6 Would Policy CC2's requirements apply to reserved matters applications where the outline or hybrid application

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<sup>1</sup> Fig 6, page 32 – Ready for Zero (Future Homes Hub, 2023)

<sup>2</sup> Policy PM13 of Draft NPPF Plan-making and national decision-making policies (December 2025)

was approved prior to the LPPU being adopted?

For Council.

4.7 Is Policy CC3 justified and effective, having regard to national policy?

No comment

4.8 Is Policy CC4 justified and effective? Is Combined Heat and Power (CHP) considered to represent a suitable decentralised energy system in terms of carbon emissions?

No comment

4.9 Is Policy CC7, justified, effective and consistent with national policy? Is Policy CC7 clear, unambiguous, internally consistent and avoids undue repetition?

No comment

4.10 How would a scheme be measured as having made “a positive contribution within the following characteristics” as per the opening paragraph of Policy CC7? Would every scheme be expected to meet all Policy CC7’s parameters?

No comment

4.11 Is Policy CC9 justified and effective?

No comment

4.12 Does the Council’s Draft Infrastructure Delivery Plan (May 2025) [EV005] clearly set out the infrastructure required to support growth and the delivery of development proposed in the LPPU?

No comment

4.13 Having regard to the list of priority infrastructure in Policy CC9, where does affordable housing fall within the prioritisation of infrastructure? What is the evidential basis for the prioritisation of particular forms of infrastructure?

No comment

4.14 Is the approach in Policy CC10 to health impact assessment justified, effective, and consistent with national policy?

While HBF did not comment on this policy we would question whether it is necessary for all major development to provide a Health Impact Assessment. The local plan itself should through its policies ensure that any policy compliant development that comes forward is consistent with the health objectives of the area and as such does not need to an HIA to confirm this. HBF recognises that there may be a need for a n HIA to be undertaken by larger developments that are no allocated in the plan and as such may have unforeseen consequences but for allocated sites and smaller

windfall development there should be no need for an HIA.

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