

**YORK LOCAL PLAN**

**EXAMINATION OF THE CITY OF YORK LOCAL PLAN 2017 – 2033**

**Schedule of Matters, Issues and Questions for the Examination  
Phase 4 Hearings**

**Made on Behalf of Barratt and David Wilson Homes**

*Matter 13 – Climate Change*

**Introduction**

13.1 These representations are made on behalf of Barratt and David Wilson Homes (Yorkshire East). Our Client has a number of strategic allocations and housing allocations across the city and has made representations at all stages of the plan, together with appearing at the Examination in Public. These representations should be read in conjunction with those representations and also our separate responses to the Councils housing needs assessment.

**14.1 Is the suite of Policies CC1 to CC3 (as proposed for modification) a sufficiently comprehensive response to this issue?**

13.2 The implications of climate change are not solely addressed in these policies, the location of homes in sustainable locations, provisions of new infrastructure, access to new open space and the policy requirements of all allocations also respond to these issues. Our Client therefore considers that these policies should be read in parallel to the plan as a whole.

**14.2 Does the approach of Policy CC1 to renewable and low-carbon energy generation and storage appropriately reflect national policy?**

13.3 Our Client does have some concerns over this and the potential for conflict with wider measures included in building regulations and other national standards. Should the Council be seeking to implement policies that go over and above the requirements of national building regulations, there should be clear evidence to show the need for this and also that the viability implications have been considered and the policy is deliverable.

13.4 There is no evidence that the Councils requirement for a reduction of emissions by 28% has been assessed in terms of the design and density implications, the viability implications or the deliverability. Without this, the policy should seek to rely on the most up-to-date building regulations.

13.5 Notwithstanding this, our client welcomes the inclusion of viability testing in the policy. However, given some of the concerns regarding the impact on local designations, particularly heritage related designations, loss of agricultural land and ecological impacts, off site

measures may not be deliverable. On this basis the feasibility and deliverability of off site schemes should also be included together with viability.

**14.3 Is the approach of Policy CC2 to sustainable design and construction justified?**

- 13.6 The Council note in the policy supporting text that these requirements in excess of building regulations require detailed evidence, however little if any evidence is provided, other than anecdotal references to why the policy would be preferable.
- 13.7 Following receipt of the Councils statement we may comment further, however as with Policy CC1 no viability assessment or feasibility assessment has been provided and as such the policy is unjustified and unsound. Should it be considered that the policy should remain it would require viability testing to be included through modifications.

**14.4 Will Policy CC3 be effective in its approach to district heating and CHP networks?**

- 13.8 Whilst our client supports the use of alternative fuels, where appropriate it is not considered that sufficient infrastructure exists at the moment in order to implement this policy. The policy requires more flexibility than the sequential approach that is included at the moment, therefore amendments should be made for each development to use the most appropriate source based on feasibility and viability.