

View Comment

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Comment ID /4894

Respondent [Campaign to Protect Rural Engl...](#)

Response Date 30 Mar 2020

Current Status Awaiting Processing

Response Type OBJECT

What is the nature of this comment?

Object

Summary We question whether the 19% reduction required by the policy is consistent with the Government's commitment, June 2019, to a new emissions-reduction target of net zero by 2050. Amendments to the wording of the policy's requirements are proposed.

Comment **Carbon reduction**

1. We question whether the 19% reduction required by the policy is consistent with the Government's commitment, June 2019, to a new emissions-reduction target of net zero by 2050, and the Committee on Climate Change advice in its 'Reducing UK Emissions 2019 Progress Report to Parliament', July 2019, that "*As the existing carbon budgets were set on a cost-effective path to achieving an 80% reduction in UK greenhouse gas emissions by 2050, a more ambitious long-term target is likely to require outperformance of the carbon budgets legislated to date*".

1.1 We therefore ask that HDC aspire to and set a higher reduction than 19%, say 30%?

2. CPRE Sussex recommend that the following Policy 37 requirements:

- "*Development proposals are expected to include measures which contribute to achieving zero carbon*" be replaced with "*Development*

proposals must include measures, which contribute to achieving zero carbon ”

- *“Major development proposals will be expected to attain a 19% reduction of the Dwelling Emission Rate ”* be replaced with *“Major development proposals must reduce the Dwelling Emission Rate by at least 19% ”*

- *“Schemes will be expected to demonstrate how this target will be attained... ”* be replaced with *“Schemes must demonstrate how this target will be attained” ”*

2.1 The latter is most important because, for example, whilst the promoter of the northern half of ‘potential housing allocation option’ ‘Land West of Billingshurst’ has acknowledged the need to minimise climate impacts, *‘it does not focus on measures to do this and there is no commitment to new energy generation technologies, other than the provision of opportunities for electric vehicle charging’* (HD Local Plan 2019-36 Public Consultation, page 70). ‘No commitment’, seems to suggest that compliance with policy requirements for achieving zero carbon is optional.

Climate change adaptation

3. We suggest that adaptation-measure 3 be amended to read: *“Green infrastructure and dual use Sustainable Urban Drainage Systems (SuDS), including permeable surfaces, to help absorb heat, reduce surface water runoff, provide flood storage capacity and assist habitat migration”.*

Proposed Change

- *“Development proposals are expected to include measures which contribute to achieving zero carbon”* be replaced with *“Development proposals must include measures, which contribute to achieving zero carbon ”*

- *“Major development proposals will be expected to attain a 19% reduction of the Dwelling Emission Rate .. ”* be replaced with *“Major development proposals must reduce the Dwelling Emission Rate by at least 19% .. ”*

- *“Schemes will be expected to demonstrate how this target will be attained .. ”* be replaced with *“Schemes must demonstrate how this target will be attained” .. ”*

And amend adaption measure 3 to read:

"Green infrastructure and dual use Sustainable Urban Drainage Systems (SuDS), including permeable surfaces, to help absorb heat, reduce surface water runoff, provide flood storage capacity and assist habitat migration".

Attachments