

London Borough of Richmond-upon-Thames Local Plan Examination

Examination Hearing Statement

Main Matter 13 – Responding to Climate Change

St George and Marks and Spencer

June 2024

Is the plan's response to the climate emergency justified by appropriate available evidence, having regard to national policy and guidance, local context, and meeting the requirements of the London Plan?

The £300/t rate has not been fully justified and tested as part of the viability for sites. An evidence base was provided at Reg 19 in an attempt to justify setting the £300/t rate (Climate Change –Local Plan Net Zero Carbon evidence base, April 2023) and was not provided at reg 18 when this rate was first introduced. The evidence base does not contain any discussion on the suitability of the £300/t rate, and the 'best practice' specification used in the sample study assumes an exemplary level of building fabric performance aligning with PassivHaus standards, not best practice. The result of this can be seen in lower than usual offset payments, which are not representative of current industry practices and therefore places an unreasonable burden on developments and would jeopardise the viability of future schemes.

Are the requirements of Policies 3 – 9 which seek to tackle the climate emergency both viable and deliverable when applied alongside all other policy requirements of the plan?

In general yes, subject to comments above.

Policy 4, as stated above is not viable, deliverable and in line with other policy, as well lacks evidence for the carbon contribution amount.

Do the Policies 3 –9 provide clear direction as to how a decision maker should react to a development proposal?

Is the plan's policy for flood risk (Policy 8) prepared with the objective of achieving sustainable development and does it avoid unnecessary duplication of national policy and guidance?

Has Policy 9 (Water Resources and Infrastructure) been shaped by engagement with all stakeholders, including infrastructure providers and statutory consultees?

Is the RLP consistent with Government policy in the written ministerial statement by Baroness Penn, Parliamentary Under Secretary of State for Levelling-up, Housing and Communities on of 13 December 2023, in relation to local energy efficiency standards? Particularly, where it states 'that the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned building regulations'?