



CLIMATE CHANGE RELATED

RESPONSE TO LOCAL PLAN ADDENDUM CONSULTATION 2020-40

ACT has reviewed the changes to policies CC2 and CC6. We wish to submit the following comments.

Overall, we commend the council for making every effort to take Climate Change seriously and resist some of the attempts to water down important policies to help mitigate this.

The design guides for climate resilience and green infrastructure are to be commended for stating clearly what kinds of development are desirable and what is not desirable.

CC2 section 2.16

We welcome the inclusion of more specific details encouraging the inclusion of 'whole life' emissions. We note that in the intervening period a new overarching resource has been published, the Built Environment Carbon Database ([BECD](#)). On 5th October this year, 2 databases (both free to use) have been released to cover the construction industry covering:

- Construction materials and products.
- Projects - developers submit LCAs to the database through development to build a comprehensive picture of construction projects.

BECD is supported by RICS and most other professional bodies related to the construction industry. A free to use calculator for construction LCAs to get SMEs on board has also been announced.

We propose that 2.16 should also encourage developers to submit an LCA to the BECD projects database.

CC6 section 2.37

Unlike the additional text for ground mounted solar (2.32), neither the policy nor its supporting clarifications allow any sites outside those identified under the listed criteria. This does seem 'unsound' as circumstances on the ground may change such that new sites may meet the criteria stated in the policy in the future.

We propose that a clarification, similar to that in CC5, is included to allow other sites that meet the very stringent criteria be considered.