

Matter 21 – Design, environmental protection and climate change

Issue – Does the Plan set out a positively prepared strategy and policies relating to design, environmental protection and climate change which are justified, effective and consistent with national policy?

Climate change

h) *Are the electric vehicle charging point requirements in Policy WLP 32 justified? What type of charging points are sought?*

1. This policy requires all applications for new development to meet the minimum standards of provision for electric vehicle charging points for residential development this is 1 charging point per dwelling with an associated dedicated parking space and where spaces are unallocated 1 charging point per 10 spaces.
2. Whilst the HBF does not oppose the provision of electric charging points, an element of flexibility would be beneficial and is considered to be compliant with the NPPF¹.
3. The HBF would also encourage the Council to work with the appropriate infrastructure providers to ensure a balanced and flexible optimised energy system that can cope with the potential for a mix of electrical heating systems and electric vehicle systems.
4. The HBF would also encourage the Council to consider the viability of the provision of electric vehicle charging points particularly if higher standards of charging points are required.

j) *What are the benefits of requiring connections or the provision of district heating and cooling infrastructure, as set out in Policy WLP 34, and where is this evidenced? Are the thresholds in Policy WLP 34 justified and clearly expressed? Does the viability evidence show that residential schemes of 300+ are capable of supporting heating and cooling systems? Are all residential schemes which incorporate a density of 50+ dwellings per hectare expected to propose heating and cooling systems, according to the hierarchy?*

5. This policy looks for developments of 10 dwellings or more to propose heating and cooling systems according to a hierarchy set out in the policy. The HBF does not consider that Wakefield should be requiring developments to connect to or to install district heating schemes or restricting the use of particular heating methods. The HBF considers that consideration needs to be given to the justification to this policy. If the policy is to be taken forward then consideration needs to be given not just to whether the development is technically viable but also financially viable and subject to viability testing. The HBF also consider that this policy may cause issues for future occupants as it is restricting future consumer choice to that particular provider of heat.
6. The Council should consider the Department for Business, Energy and Industrial Strategy consultation on Heat Networks: Building A Market Framework (ended on 1st

¹ Paragraph 105 & 107.

Home Builders Federation (HBF) response to the
Wakefield Local Plan Examination
Matters, Issues and Questions

June 2020). To meet the Government's legal commitment on reducing greenhouse gas emissions virtually all heat in buildings will require decarbonising. Heat networks are one aspect of the path towards decarbonising heat, however currently the predominant technology for district-sized communal heating networks is gas combined heat and power (CHP) plants. Over 90% of district networks are gas fired. As 2050 approaches, meeting the Government's climate target of reducing greenhouse gas emissions to net zero will require a transition from gas-fired networks to renewable or low carbon alternatives such as large heat pumps, hydrogen or waste-heat recovery but at the moment one of the major reasons why heat network projects do not install such technologies is because of the up-front capital cost. The Council should be aware that for the foreseeable future it will remain uneconomic for most heat networks to install low-carbon technologies.

7. Furthermore, some heat network consumers do not have comparable levels of satisfaction as consumers on gas and electricity networks, and they pay a higher price. Currently, there are no sector specific protections for heat network consumers, unlike for people on other utilities such as gas, electricity or water. A consumer living in a building serviced by a heat network does not have the same opportunities to switch supplier as they would for most gas and electricity supplies. All heat network domestic consumers should have ready access to information about their heat network, a good quality of service, fair and transparently priced heating and a redress option should things go wrong. Research by the Competition and Markets Authority (CMA) found that a significant proportion of suppliers and managing agents do not provide pre-transaction documents, or what is provided contains limited information, particularly on the on-going costs of heat networks and poor transparency regarding heating bills, including their calculation, limits consumers' ability to challenge their heat suppliers reinforcing a perception that prices are unjustified. The monopolistic nature of heat networks means that future price regulation is required to protect domestic consumers. The CMA have concluded that "a statutory framework should be set up that underpins the regulation of all heat networks." They recommended that "the regulatory framework should be designed to ensure that all heat network customers are adequately protected. At a minimum, they should be given a comparable level of protection to gas and electricity in the regulated energy sector." The Government's latest consultation on heating networks proposes a regulatory framework that would give Ofgem oversight and enforcement powers across quality of service, provision of information and pricing arrangements for all domestic heat network consumers.