

Basic Inspectors' Questions:

**A:**    ***Do the Climate Change policies in the Plan ensure that development ... contributes to the mitigation of ....climate change? and***

**B:**    ***Are they consistent with national policies, ..... and effective?***

WIMBLEDON SOCIETY RESPONSE:

**A:**    The government's date for achieving the national net zero target is 2050.  
More than 90% of the buildings that will be standing at that time in Merton are already in existence, today.  
In most cases therefore they will need to be adapted and retrofitted.

So important is the issue of Climate Change that the Society feels that the new Local Plan should not, as has been the case in the past, confine itself to merely controlling **new** development.  
Instead, the Plan should take on the role of driving forward a Borough-wide programme of work that will deliver net zero.

Without a co-ordinated programme of work, measured against realistic targets, **there can be no confidence that net zero can be achieved.**

A Local Council is seen as the only credible body that can oversee and drive forward this work, and this should be an integral part of any modern Local Plan. There is no other body that can do this.

So today's Local Plans need to be promotional and aspirational, not limited to Development Control.

Sitting back and relying on Planning Policies that could improve the energy and sustainability performance of only 5 - 10% of the building stock by 2050 **leaves the majority of buildings out of the equation**, and their required upgrading to chance.

The Society view is that this approach is **highly unlikely to meet the legally required net zero targets.**

**In this respect therefore, the Plan is ineffective, and should be considered 'UNSOUND'.**

The Society's proposals for changes to the draft Plan were set out in the submission to the Council of 5 September 2021, primarily on pages 2, 3, 4.

In essence, for the Plan to be considered 'Sound', it should be amended to incorporate:

- a range of **promotional Policies and Initiatives**, and a **programme of work with targets** aimed at delivering net zero: and
- a significant **strengthening of a range of Policies**: and
- a **setting of realistic energy targets** that encourage developers to design to optimum future standards, and not, as now, design to old standards, and pay derisory sums into so-called amelioration funds.

**B:**    ***Are the Plan Policies consistent with National Policy?***

The government's legal obligations under the Climate Change Act require it to show how the UK's binding carbon budgets will be met.

But the government's Climate Change Committee (6/22) found that **credible plans exist for only 40% of the required emissions reductions.**

Also, the recent (7/22) High Court judgement \*\* stated that **'The government's Net Zero Strategy (NZS) is unlawful as it breaches the Climate Change Act'**: This raises significant questions.

(\* \*\* FoE/Client Earth & others v Secretary of State for Business, Energy & Industrial Strategy: EWHC 1841)

If the Council's draft Plan complied with National Policy when it was published, as that Policy has been found to be **unlawful**, there should now be a presumption that **the Plan fails to meet national objectives.**

Accordingly, **the Plan should be considered 'UNSOUND'**, and needs significant amendment.

ENDS