BUILDING
A BETTER FUTURE

Climate Change Topic Paper

November 2026



Havant
BOROUGH COUNCIL

1. Introduction

1.1 Addressing the causes and impacts of climate change are central to Havant Borough Council's ambitions to become a net-zero carbon and climate resilient authority and Borough. Responding to climate change is underpinned by effective spatial planning influencing emissions, protecting the environment and increasing resilience through the location and design of development.

1.2 This Topic Paper is part of the evidence base for the submissions of the draft Havant Building a Better Future Local Plan (BBFP). It clarifies the position of the local plan in relation to supporting the Council's climate emergency declaration and commitment to reducing carbon emissions to net zero by 2045. This topic paper provides a summary of the technical information relating to climate change policies which are included in the local plan.

1.3 The topic paper also includes a section on the Government's latest Written Ministerial Statement (WMS) on Local Energy Efficiency Standards update on 13 December 2023 and the reasons why the Council considers that using the Energy Use Intensity (EUI) standards represent an effective and justified approach to ensuring high energy efficiency and low carbon performing homes in the BBFP.

1.4 To consider addressing the causes and impacts of climate change within the plan area, we first need to understand the risks the Borough is facing. As a coastal authority, Havant is at risk of severe and intense flooding and rainfall intensity projections. The latest UK Climate Projections (UKCP18) indicate that sea levels in southern England could rise by approximately 1 metre by 2100 under higher emissions scenarios, while winter precipitation could increase by up to around 35%.

1.5 Following a predicted increase in average temperatures from 2°C to 4°C over the coming century Havant will experience higher levels of drought and intensity of rainfall over the coming years. Temperatures are predicted to reach upwards of around 35°C over the next century and these are likely to increase further without significant change being implemented[1].

1.6 Climate change has the potential to disrupt transport networks, increase risks to human health from heatwaves, place additional pressure on water resources, increase the frequency and severity of drainage and flooding incidents, increase summer cooling demand, and affect critical infrastructure. Climate-related events such as flooding can also adversely affect community wellbeing and mental

[1] Time-mean Sea Level Projections to 2100 (cm) | The Met Office climate data portal

health. In low-lying coastal areas of the Borough, including parts of Hayling Island, rising sea levels may increase the risk of saline intrusion into soils and groundwater[2].

1.7 Therefore, a proactive approach is considered imperative to ensure that the Borough of Havant remains a high quality place to live.

1.8 There are many approaches a local plan can take to tackle, adapt and mitigate the impacts and effects caused by climate change. A combination of supporting both sustainable development and natural environment protections are considered the most robust approach to ensure targets can be achieved and the outcomes produced are those that create a sustainable and safe borough.

1.9 Delivering sustainable, low carbon development alongside the above is key to success. Therefore it is considered that in Havant Borough, development should use passivhaus principles, follow an energy hierarchy, improve the energy efficiency of development and ensure renewable energies are incorporated onsite. Carbon needs to be designed out at the start of any development and produce highly sustainable development.

1.10 Responding to both mitigation and adaptation of climate change are considered to be a high priority to the authority and are embedded into the Council's Corporate Strategy but it also reflects stake-holder's concerns following feedback received in the two consultations in 2022 and 2025.

1.11 It is considered clear that the Local Plan should respond positively and proactively to the challenges of climate change. This Topic Paper will go into this further, explaining the national and local policy context. The paper will also look at the relevant evidence base, providing a synopsis of the evidence documents which inform the policy directions and approach taken by HBC. This topic paper has significant cross-overs with the other topic papers within the Local Plan and it recommended that this paper is read alongside those.

Policies, Strategic Issues and the Local Plan Policy Approach

1.12 Climate Change relates to many of the plans policies however the most relevant within the Building a Better Future Plan are policies:

- Policy 11: Climate Change
- Policy 16: Low Carbon Development
- Policy 17: Preventing Overheating
- Policy 18: Sustainable Construction Methods, Materials and Waste
- Policy 19: Water Efficiency

[2] Met Office and Department for Environment, Food and Rural Affairs (2018), *UK Climate Projections 2018 (UKCP18)*; Department for Environment, Food and Rural Affairs (2022), *UK Climate Change Risk Assessment 2022*

2. Legislative, national and local strategic context

Climate Change Act 2008

2.1 The Climate Change Act 2008 introduced a statutory target of reducing carbon dioxide emissions to at least 100% below 1990 levels by 2050, with interim targets, set through five-yearly carbon budgets. The UK Government are legally bound to meet this target. The Act created a framework for climate adaptation, and the independent evidence report that information the statutory UK Climate Change Risk Assessment was published in June 2021.

2.2 The Climate Change Act includes a compulsory reporting mechanism of climate change impacts for certain public bodies and organisations. The Council declared a climate emergency in 2024 and in doing so committed to becoming net zero operationally by 2035 and borough wide, by 2045, ahead of the 2050 statutory target. Havant Borough Council has since produced a Climate Change Strategy and Action Plan, Carbon Emissions Baseline Report and Decarbonisation Roadmap all with the aim of informing the authority on progress being made towards these targets.

Planning and Energy Act 2008

2.3 The power for Local Planning Authorities (LPAs) to set their own energy efficiency standards derives from the Planning Energy Act (PEA) 2008. As such, LPAs may set higher standards for energy efficiency in their Local Plan policies than the baseline required by the Building Regulations provided that such policies are:

a) reasonable,

b) not inconsistent with national policies; and

c) compliant with the usual provisions around plan making found in section 19 of the Planning and Compulsory Purchase Act 2004.

National Planning Policy Framework 2024

2.4 The National Planning Policy Framework, states at paragraph 162 that:

'*Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure'.*

2.5 An earlier paragraph, 161 states that:

The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in

greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

National Planning Practice Guidance

2.6 The Climate Change Planning Practice Guidance (PPG) advises how to identify suitable mitigation and adaptation measures in the planning process to address the impacts of climate change. Addressing climate change is a core principle of spatial planning and planning also has an important role in delivery of new renewable and low carbon energy infrastructure to facilitate the transition to net zero. The Renewable and Low Carbon Energy PPG provides further guidance on policies for renewable and low carbon energy [Renewable and low carbon energy - GOV.UK]

2.7 The PPG in paragraph 012 (Ref ID: 6-012-20190315), which was last updated on 15th March 2019, states: 'Different rules apply to residential and non-residential premises. In their development plan policies, local planning authorities:

- Can set energy performance standards for new housing or the adaptation of buildings to provide dwellings, that are higher than the building regulations, but only up to the equivalent of Level 4 of the Code for Sustainable Homes.
- Are not restricted or limited in setting energy performance standards above the building regulations for non-housing developments.

The UK Net Zero Strategy: Build Back Greener

2.8 The UK Net Zero Strategy 2021 sets out a strategy for the UK to reach net zero by 2050. This strategy sets out sectoral policies and proposals for decarbonising all sectors of the UK economy to meet the coming carbon budgets, the Nationally Determined Contribution (NDC) and vision for a decarbonised economy in 2050 [Net Zero Strategy: Build Back Greener - GOV.UK]

Why this is important

2.9 It is critically important that Havant Borough council can justify and evidence its approach to combating climate change through mitigation and adaptation measures. It is considered that the evidence outlined can support the approach the council has taken to seek higher energy targets then set out by building regulations.

Written Ministerial Statement

2.10 On 13th December 2023, the Government released a new Written Ministerial Statement (Written statements - Written questions, answers and statements - UK Parliament) which stated that:

> The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly cost-ed rationale that ensures:

• That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Frame-work.
• The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).

Where plan policies go beyond current or planned building regulations, those polices should be applied flexibly to decisions on planning applications and ap-peals where the applicant can demonstrate that meeting the higher standards is not technically feasible, in relation to the availability of appropriate local energy infrastructure (for example adequate existing and planned grid connections) and access to adequate supply chains.

To be sound, local plans must be consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the Na-tional Planning Policy Framework and other statements of national planning poli-cy, including this one.

The Secretary of State will closely monitor the implementation of the policy set out in this WMS and has intervention powers provided by Parliament that may be used in respect to policies in plans or development management decisions, in line with the relevant criteria for such intervention powers.

2.11 The above supersedes the section of the 25 March 2015 WMS entitled 'Housing standards: streamlining the system', sub-paragraph 'Plan making' in respect of energy efficiency requirements and standards only. Planning Practice Guidance will also be updated to reflect this statement"

2.12 The Town and Country Planning Association (TCPA), alongside 12 organisation and over 50 local authorities wrote a response to the secretary of state in 2024 expressing their concern over the limiting impact of the WMS on local authorities wishing to set standards for net zero new homes in their authorities. A copy of the letter is attached in the appendix. A response was received by the TCPA from the SOS in March 2024[3]. This response clarified that the WMS should be treated as a material consideration rather than as an absolute prohibition on local plan policies which exceed Building Regulations.

2.13 The NPPF confirms that WMSs are relevant to consider when preparing local plans. The 2023 WMS continues to set out that local authorities can set policies where local evidence and circumstances justify this and the policies are reasonable. Local authorities retain the power under section 1 of the 2008 Act and they must still comply with their duties under section 19 (1A) of the Planning and Compulsory Purchase Act 2004.

2.14 Therefore, and as a result of the above and other reasons which will be explained in the detail of the paper, Havant Borough Council has taken the decision to proceed with EUI metrics within the Building a Better Future Plan.

Building Regulations

[3] www.tcpa.org.uk/joint-letter-to-the-secretary-of-state-regarding-the-13-december-written-ministerial-statement/

2.15 Part L of the Building Regulations is the key mechanism for implementing the Building Act (1984) with regard to the conservation of fuel and power in buildings in the UK. In June 2022 an updated Part L 2021 came into force replacing the previous Part L 2013 version. This is intended as an interim step before the adoption of the Future Homes Standard (FHS) and Future Buildings Standards (FBS) which was expected to be introduced in 2025 and should be introduced in 2026.

2.16 The recently updated Part L 2021 is intended to deliver an average 31% and 27% reduction in regulated CO2 emissions, compared to the previous Part L 2013 regulations, for domestic and non-domestic buildings respectively.

2.17 The Standard Assessment Procedure (SAP) is the methodology used by Government to assess and compare the energy and environmental performance of dwellings. The SAP methodology is used for Part L of the Building Regulations, which is in turn used to demonstrate CO2 emission performance of new development proposals against local authority planning policy targets.

However, energy standards required by the current building regulations 2021 (part L) and the indicative standards for the next update for part L (Future homes standard) are neither strict enough to make new homes net zero nor are they energy efficiency enough to help meet the UKs carbon budgets.

2.18 To mitigate climate change in line with the Climate Change Act, it is considered appropriate to seek higher standards through the local plan to achieve this. Improving the design of a building by reducing the extent of heat loss areas, the number of junctions and gaps and by optimising elevation design for winter solar gains are some of the most effective components of an energy efficient design but are not sufficiently covered by building regulations. Such measures will instead be required in all new buildings through local plan policy and through adopting a Low Energy Transformation Initiative (LETI) approach.

3. Local Strategic Context and evidence

Havant Borough Council Corporate Strategy

3.1 The Council's Corporate Strategy[4] seeks to deliver key priorities within the following themes of Wellbeing, Pride in Place, Growth and A Responsive Council.

3.2 Climate mitigation and adaptation are essential to achieving the priorities of the Corporate Strategy. "Support our residents and businesses to reduce greenhouse gas emissions" is a specific aspiration of this strategy with the Council's Climate Change Strategy implementing this.

Climate Change Strategy and Action Plan

3.3 The Council's Climate Change Strategy and Action Plan[5] was adopted in response the Councils corporate priority and outlines over 33 actions and workstreams needed to be completed to support the authority achieving its net zero targets and decarbonisation goals. Under the Climate Change Act 2008 the authority has a legal obligation to be net zero by 2050. In order to proactively respond to this, HBC have set their targets as:

1. Net zero operational emissions by 2035
2. Net zero Borough wide emissions by 2045
3. Interim target of 68% reduction by 2030.

3.4 Alongside this strategy the Council declared both a Climate Change emergency and Nature Emergency to strengthen the authorities approach to tackling and responding to climate change.

Biodiversity Strategy

3.5 The provides a summary of the Borough's natural environment, explores some of the challenges facing biodiversity, and provides a framework for the Council to protect and enhance the Borough's biodiversity where it is able to do so. The strategy will underpin planning policy within the Councils' emerging local plan and assist the authority in meeting the strengthened duty to conserve and enhance biodiversity under the Environment Act 2021.

Active Wellbeing Strategy

3.6 This strategy aims to empower people to lead happier, healthier and more fulfilling lives and to support those who face the greatest inequalities to have improved opportunities to move more.

3.7 Havant Active Wellbeing is a five-year strategy to reimagine how residents move more every day. This strategy provides partners working in Havant with a blueprint of how to shift towards a concept of Active Wellbeing – a more integrated health and wellbeing offer that has a

[4] www.havant.gov.uk/our-organisation/strategy-policy-and-performance
[5] www.havant.gov.uk/climate-change-sustainability-and-environment/climate-change-strategy

positive impact on local strategic priorities, particularly health, the environment, regeneration, economy, housing, transport and community safety.

Tree and Woodland Strategy

3.8 This strategy recognises how trees form an intrinsic part of the natural environment and that are critical to supporting the Councils commitment to reaching net zero. There is a growing focus on nature-based solutions and the provision of ecosystem services depends on increasingly emphasising urban forest management for health and safety concerns, resolving complaints about trees and to include policies to provide benefits such as storm-water attenuation, heat amelioration and air purification. This strategy outlines how these trees are to be cared for, managed and allows to thrive so they can continue enhancing the Borough and providing important spaces for residents to relax and connect to nature.

Local Plan Evidence Base Documents

3.9 The Council has completed two pieces of work to support its evidence base within its Local Plan. WSP were procured to develop the latest Climate Change Feasibility Study (download) evidence base reference NE03, as well as the Renewable Energy Capacity study (download) evidence base reference IT05.

3.10 The feasibility study found that the achievement of a net zero home relied on minimising energy needs via efficient design, with space heating provided by a heat pump. Solar PV generation on-site could then provide most of the energy requirements. Without a mix of energy sources (natural gas and electricity typically) in design there was considered to be a limited benefit in setting a TER performance target beyond Building Regulations requirements as described in the WMS.

3.11 WSP considered that there was value in needing to minimise energy needs (kWh/m2/yr) since the lower the energy needs of a new house then the easier it is to achieve net zero performance. In this sense, net zero homes need to think about energy (kWh) rather than carbon (kgCO2e). This is why design guidance issued by organisations such as LETI and RIBA discuss minimum energy performance targets and while the WMS discourages additional carbon targets it does not explicitly discuss energy performance targets. WSP considered it was therefore possible for Local Plans to encourage developers to seek energy performance targets expressed in absolute terms.

3.12 WSP considered that in net zero design, not only is the building design concerned with meeting energy efficiency and carbon targets, but also in enabling a net zero development. In other words, design needs to consider all sources of energy demand (regulated and unregulated) rather than only regulated. New and redeveloped buildings should be built to high environmental standards and should be encouraged to exceed minimum local planning policy and Building Regulations requirements. Whilst the 2016 Zero Carbon Homes target has been replaced with the Future Homes Standard, new residential development is encouraged to pursue net zero standards where feasible.

3.13 The most effective way to reduce carbon emissions in any new development is to reduce the energy requirements once in use to a minimum. Once appropriate design features are integrated then low carbon energy generation options can be considered for adoption.

3.14 In summary, WSP concludes that higher standards of energy efficiency (and therefore lower absolute energy requirements in design) is achievable without any significant impact on plotting within a given site. The overall energy performance of residential builds is most heavily influenced by design decisions, rather than form factor, other than in targeting Passivhaus performance for specific archetypes. The required technologies and approaches to achieving net zero homes are already available in the market. This means that assessing site viability ultimately rests on good practice approaches to design, rather than being dependent on cost premiums associated with innovation and the introduction of new technologies or design methods.

3.15 In additional to this WSP produced evidence outlining that just as the 'energy hierarchy' supports good practice design in net zero homes, the 'waste hierarchy' equally applies.

3.16 WSP considered that good practice in development should seek to re-use existing materials as far as possible so as to minimise the amount of materials needed and the impacts of their transport to site. This discourages demolition that isn't coupled with significant amounts of reclamation and re use/re-purposing.

3.17 Modular design approaches, with varying levels of pre-fabrication from individual components to whole structural envelopes, should support waste minimisation and resource efficiency in development. Design of new development therefore needs to incorporate the capacity to collect different waste streams and therefore enable recycling. Many outcomes of which have formed policies within the latest BBFP around Construction, Waste and Materials as well as Low Carbon.

Different ways of expressing energy use

3.18 The Standard Assessment Procedure (SAP) compares energy efficiency standards to a 'notional building'. This one size fits all metric can therefore create challenges to understand a true and accurate picture of the total energy consumption of a development. It does not allow authorities to review and consider both regulated and unregulated energy and it reduces the ability of authorities to prioritise energy efficiency measures that have the potential to be incorporated.

3.19 Using an Energy Use Intensity (EUI) Metric allows an energy target to be applied to an individual houses specific build, ensuring that both regulated and unregulated energy is considered, and allows post monitoring of targets following completion. Therefore, this approach and metric is considered to be the most effective way to ensure a new build is net zero compared to the SAP approach and reliance on Target Emission Rates (TERs).

3.20 In the BBFP new policy the EUI building metric is measured alongside space heating demand and renewable energy generation to give a whole building picture. EUI represents the total amount of energy used by a building divided by the floor area. The amount of energy is calculated using kWh/m2 year. The use of EUI has been found by multiple planning inspectors to be justified approached in a number of Local Plans. Using EUI is, therefore, considered to represent best practice and a more accurate indicator of the energy efficiency of a home/building than TER and it can be calculated or checked at both design stage and at the post completion stage.

3.21 Knowing and taking into account all of the above, and the authorities desire to be bold and proactive when it comes to sustainable, low carbon design EUI is considered to be on the only reasonable metric to be used in the BBFP.

4. Viability

4.1 The Council has included low carbon measures within the Local Plan Viability Assessment (HS03, HS03-A, HS03-B and HS03-C) and with this inclusion, the new local plan is still considered to be viable which provides evidence that development can support low carbon measures to new development and supports the direction the Local Plan sets out[6].

4.2 Furthermore, evidence base studies for the Future Homes Standard show that existing available market solutions are capable of delivering net zero homes7. Fabric efficiency and required wall thickness have little impact on plotting (and therefore achievable dwelling numbers) for any given development site. No consensus on development costs of different design approaches was achieved. It was found that only Passivhaus design standards are recognised as requiring a cost premium.

4.3 Experience from the Code for Sustainable Homes is that additional costs will fall as the supply chain responds to developer demand. As with existing Part L requirements, a range of metrics were needed to fully describe building performance.

4.4 As a result the Council considers that this element of the Local Plan is well-evidenced and the policies robustly informed. However, in order to ensure that this approach is assessed on a case by case basis the policy also includes flexibility to respond to feasibility and viability concerns if there are anomalies on particular development sites.

[6] Local Plan Evidence: Studies and Strategies | Havant Borough Council
[7] The Future Homes and Buildings Standards: 2023 consultation - GOV.UK

5. Other Local Plans

5.1 Havant Borough Council has been out to regulation 18 on two occasions. During this time, four local authorities have had higher energy efficiency measures approved as part of their local plan which demonstrates how Inspectors are responding to targets that achieve more than building regulations.

Winchester City Council (Winchester LP report_CFI 1 (002).pdf)

> The Plan, taken as a whole, includes policies designed to secure that the development and use of land in the Plan area contributes to the mitigation of, and adaptation to climate change. This is a defining issue in the Plan flowing from the Council's Climate Emergency Declaration [CN08]
>
> The Development Plan, taken as a whole, therefore includes policies designed to secure that the development and use of land contribute to the mitigation of, and adaptation to, climate change
>
> No matter how energy efficiency is proposed to be measured, the environmental outcome, to mitigate climate change and contribute to the net zero obligation, will remain the same. It will meet the over arching objective of national policy. Therefore, based on the evidence before me, I find the Council's approach in policy CN1 and CN3, subject to the MMs proposed consistent with national policy, justified and effective. It is therefore sound.

Bath and North Somerset Local Plan (EXAM24 Inspectors Report.pdf)

> The NPPF is clear that mitigating and adapting to climate change, including moving to a low carbon economy, is one of the key elements of sustainable development, and that the planning system should support the transition to a 22 Bath and North East Somerset Council, Local Plan (Core Strategy and Placemaking Plan) Partial Update, Inspector's Report December 2022 low carbon future in a changing climate. Whilst NPPF154b sets out that any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards, for the reasons set out, that whilst I give the WMS 2015 some weight, any inconsistency with it, given that it has been overtaken by events, does not lead me to conclude that Policy SCR6 is unsound, nor inconsistent with relevant national policies.
>
> I am satisfied that the energy efficiency standards set out in Policy SCR6 are justified and that they would not threaten deliverability or viability of housing development. Policy SCR6 should be amended so that the requirements for energy assessments are clear and that offsetting contributions would be sought where consistent with the legal tests for planning obligations.

Uttlesford Local Plan 2021-2041 (Report on the Examination of the Uttlesford Local Plan 2021-2041)

Furthermore, judging by a number of local plans that are either recently adopted or emerging, for example Tendring Colchester Borders Garden Community Development Plan Document and Chelmsford Local Plan, there is a growing trend for net zero carbon building standards that go beyond current and planned building regulations in Essex. This is influenced by the model planning policy position for net zero carbon development recommended by Essex County Council. There is therefore a degree of consistency in Essex to the adoption of the metrics used in Core Policy 22, which reduces the novelty of such an approach for developers in the County. It is also the case that the use of the EUI metric is becoming more common nationally.

We have considered the effect of achieving net zero carbon in operation on the viability of new development and are satisfied that realistic build-cost uplifts have been factored into Viability Assessment Stages 1 and 2 (INF7 and INF8). In the light of this, we accept the viability assessment reports findings that there is reasonable prospect of the Plan's strategic allocations coming forward viably.

While undoubtedly an ambitious approach, the requirements in Core Policy 22 would help design buildings in ways that contribute to significant reductions in greenhouse gas emissions, which is consistent with the approach to mitigating and adapting to climate change in the Framework. Given the above conclusions we find that there is a justified rationale for the approach taken in Core Policy 22. Although the use of alternative metrics to TER means that it departs from the WMS, that departure is justified by the evidence presented to us and the objectives of the Plan in addressing climate change.

6. Conclusions

6.1 The Building a Better Future Plan has enabled policies to be pooled together and assessed to ensure greater weight is given to climate change for future developments in Havant Borough. This has been done in recognition for the response and action required to safeguard, protect and create sustainable development for the Borough.

6.2 The PPG (Paragraph: 012 Ref ID: 6-012-20190315) cites that The Planning and Energy Act 2008 allows local planning authorities to set energy efficiency standards in their development plan policies that exceed the energy efficiency requirements of the building regulations. Alongside this Local Planning Authorities need to demonstrate to a Local Plan Inspector how they meet the obligation in the NPPF to 'contribute to the mitigation and adaptation to, climate change' and to meet the requirements of the Planning Act 2008.

6.3 As the LETI energy efficiency standards provides a more accurate measurement and prioritises energy efficiency measures an EUI metric is considered the best metric to use to ensure low carbon sustainable development is built in the Borough.

6.4 There has been a consistent stream of local plans being found sound using an EUI metric, following the introduction of the WMS. Therefore this is considered to be the correct, justified and effective approach for the Building a Better Future Plan to follow.

Appendices

Appendix 1

Joint local planning authority letter to the secretary of state regarding the written ministerial statement from the Town and Country Planning Association

21st February 202

Joint letter to the Secretary of State regarding the 13 December Written Ministerial Statement

and

Find out more about the EDG at: www

Appendix 2

Essex County Council open legal advice:

April 2023

Essex Open Legal Advice | Essex Design Guide



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