



Colchester Preferred Options Local Plan - Regulation 18 Representation

We object to Policy NZ2 as currently drafted. While the objective of reducing embodied carbon is supported in principle, the policy is overly prescriptive, insufficiently flexible, and risks undermining development viability and deliverability when considered both on its own and cumulatively with Policy NZ1 and the wider policy framework of the emerging Local Plan.

1. Consistency with Policy NZ1 and Cumulative Burden

The concerns raised in respect of Policy NZ1 apply equally to Policy NZ2. In particular, both policies introduce technically complex, evolving and costly requirements at plan level, without sufficient regard to proportionality, viability, or the cumulative impact of Local Plan policy obligations. When combined, Policies NZ1 and NZ2 materially increase risk, cost and uncertainty for applicants, particularly for smaller and medium-scale developments.

2. Technical Complexity and Evolving Methodologies

Meeting embodied carbon requirements typically necessitates a Whole Life Carbon Assessment (WLCA), relying on Environmental Product Declarations (EPDs), assumptions around service life and replacement cycles, and specialist modelling tools. This area remains technically complex, rapidly evolving, and not yet fully standardised at national level. The policy therefore places significant reliance on data, methodologies and professional judgement that are outside an applicant's direct control, increasing planning risk and cost.

These requirements are particularly burdensome for smaller developers and schemes, and the policy does not adequately distinguish between different scales or types of development.

3. Limited Supply Chains and Practical Constraints

Lower-carbon construction materials (such as low-cement concrete, recycled steel or structural timber) are not consistently available across the UK, may involve extended lead-in times, and remain vulnerable to supply chain disruption. This makes strict embodied carbon targets difficult to achieve reliably and consistently, particularly at scale or within constrained delivery programmes.

4. Viability Impacts and Lack of Financial Payback

Reducing embodied carbon often results in increased upfront costs through additional design time, specialist consultants, alternative materials, and construction complexity. Unlike operational energy efficiency, embodied carbon measures do not typically generate direct reductions in running costs, limiting any financial offset. In the current context of high interest rates, build cost inflation and multiple policy obligations, this has a direct and adverse impact on scheme viability and land values.

If applied rigidly, Policy NZ2 risks sterilising otherwise deliverable sites and suppressing housing delivery.

5. Design Trade-offs and Competing Objectives

There are well-recognised tensions between embodied carbon reduction and other policy objectives, including fire safety, acoustics, durability, insurance and warranty requirements. For example, while timber construction may reduce embodied carbon, it can introduce height restrictions, insurer reluctance and more onerous detailing requirements. Policy NZ2 does not adequately acknowledge or allow for these necessary trade-offs.

6. Absence of a Clear National Mandate

There is currently no statutory national requirement for embodied carbon targets in England. Most such requirements remain policy-led and aspirational. Introducing fixed numerical thresholds at local plan level risks creating a postcode lottery and pre-empting national regulation, particularly where emerging standards (such as the NZCBS) are referenced but not yet in force. This undermines certainty and risks the policy becoming quickly outdated.

7. Reuse, Retrofit and Demolition

While the encouragement of reuse and retrofit is supported, the policy wording that demolition will “only be acceptable where justified to the satisfaction of the Local Planning Authority” is overly restrictive. Demolition may be necessary for a range of legitimate reasons, including structural condition, contamination, inefficiency or the delivery of wider public benefits. These matters are already addressed through existing planning and heritage policies and do not require further constraint through an embodied carbon policy.