

BEDFORD BOROUGH COUNCIL DEVELOPMENT PLAN DOCUMENT
ALLOCATIONS & DESIGNATIONS

CLIMATE CHANGE

ISSUES & OPTIONS PAPER

| DECEMBER 2010 |



BEDFORD
DEVELOPMENT
FRAMEWORK



Allocations and Designations DPD

CLIMATE CHANGE Issues and Options Paper

December 2010

A summary of the Climate Change Issues and Options Paper will be made available in large copy print, audio cassette, Braille or languages other than English on request. If you require the document in one of these formats please contact the Policy team by calling 01234 221732, sending an email to bdf@bedford.gov.uk or writing to Planning Services, Town Hall, St Paul's Square, Bedford MK40 1SJ.

The Paper is available to view and download on the Council's website www.bedford.gov.uk/planning and to view at local libraries.

How to comment Comments can be returned by email, letter or fax as follows:

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Please note that all comments received will be made public.

INTRODUCTION AND CONTEXT

In 2007 the council signed the Nottingham Declaration on climate change reflecting its commitment to reducing carbon emissions. It is also signed up to the 10:10 campaign.

CORE STRATEGY AND RURAL ISSUES PLAN AND OTHER RELEVANT POLICY BACKGROUND

Planning Policy Statement: Planning and Climate Change (Supplement to PPS1) encourages planning authorities to set policies requiring a percentage of the energy used in new development to come from decentralised, renewable or low-carbon sources and encouraging sustainable buildings.

Amongst other matters, policy CP26 of the Core Strategy and Rural Issues Plan seeks to minimise the consumption and use of energy from new buildings, encourage sustainable construction and minimise the use of water. The Plan notes that further policy will be developed as part of the Allocations and Designations Plan.

To support the preparation of the Allocations and Designations Plan, the council commissioned consultants to assess the scope for more ambitious climate change policy requirements. The results of this work are published in a background paper: the *Bedford Energy Potential Study*, AECOM, 2010.

WHAT DID YOU SAY IN EARLIER CONSULTATIONS?

The Issues and Options paper consultation in 2008 noted that the scope of energy-related policies will be investigated in a background study and included in the Allocations and Designations Plan. The study was not completed in time to be included in the Draft Plan published for consultation in May 2010 which is why this separate paper has been produced.

WHAT IS BEING PROPOSED?

Government guidance allows local authorities to require levels of building sustainability in advance of those set nationally where local circumstances warrant. These should be set in terms of national standards and cover various issues, including water, waste and recycling, flood risk, pollution and security. Actions must not only be taken to reduce the impacts of climate change by reducing carbon emissions but also to adapt development to the effects of climate change and other environmental damage.

The Code for Sustainable Homes and Building Research Establishment Environmental Assessment Method (BREEAM) consider the wider environmental impact of a building and therefore can achieve more holistic results with regards to delivering sustainable design and construction. Compliance with the required standard can be easily demonstrated through achievement of certification. Both systems are regularly updated to reflect changes in the industry and feedback from developers and manufacturers. The methodology and quality assurance for the achievement of the required rating is carried out by licensed assessors and the

Building Research Establishment. The methodology is publicly available and linked to government approved software used to demonstrate Building Regulations compliance. In order to demonstrate compliance, full pre-assessment certification under the relevant scheme, accompanied by a signed letter of explanation from a registered assessor would be required. Post-construction validation would also be required.

The Code for Sustainable Homes goes further than the current building regulations, and is intended to help promote even higher standards of sustainable design. The Code measures the sustainability of a new home against nine categories of sustainable design, rating the 'whole home' as a complete package. The Code uses a one to six star rating system to communicate the overall sustainability performance of a new home against these nine categories. The Code sets minimum standards for energy and water use at each level achieving carbon neutrality at level six. It is recognised that zero carbon may be difficult to achieve on all sites and the Government considers that flexibility could be introduced by allowing developers to make payments to fund community energy projects. Domestic water consumption in the East of England is currently about 130 – 160 litres per person per day. Significant reductions can be achieved by installing low water use sanitary ware at relatively little additional cost. However achieving the requirements of Code levels 5 and 6 is likely to require expensive grey water recycling systems.

The Government is committed to requiring all new homes to be zero carbon by 2016, achieving this by staged reductions in carbon emissions requirements in the Building Regulations. The most recent of these in October 2010, introduced a 25% reduction in carbon emissions relative to the 2006 Building Regulations requirement. This exceeds the minimum carbon reductions required at levels 1 – 3 of the Code for Sustainable Homes.

Further information on sustainable design and construction can be found at www.planningportal.gov.uk/england/professionals/buildingregs/sustainablehomes and www.breeam.org.

Code for Sustainable Homes		
<i>Code level</i>	<i>Minimum percentage reduction in dwelling emission rate over target emission rate for CO₂</i>	<i>Maximum indoor water consumption in litres per person per day</i>
1	- *	120
2	- *	120
3	- *	105
4	44	105
5	100	80
6	net zero carbon	80
Credits are additionally awarded for the following categories - materials, surface water run-off, waste, pollution, health and wellbeing, management, ecology.		

* Building Regulations Part L 2010 introduced a 25% reduction in carbon emissions thus exceeding the minimum requirement at lower levels of the Code

BREEAM	
<i>BREEAM rating</i>	<i>Credits are awarded for the following categories</i>
Pass	Energy, management, health and wellbeing, transport, water, materials, waste, land use, pollution, ecology
Good	
Very Good	
Excellent	
Outstanding	

OPTIONS FOR COMMENT

OPTION CC1

This option would expect new homes in the borough to achieve at least Code level 4. The background paper notes that there is a significant increase in costs above this level of the Code due to the need to restrict water use. Homes built with Homes and Communities Agency funding are already expected to achieve Code level 4, therefore the policy would ensure that all tenures will target the same standards. The option would require non-domestic developments to achieve BREEAM “very good” standard.

OPTION CC2

This option would expect new homes in the borough to achieve at least Code level 4, but additionally to aim for carbon neutrality. This avoids the significant additional costs associated with achieving higher levels of the Code while still achieving the highest possible reduction in carbon emissions. It is recognised that it may not always be feasible to achieve carbon neutrality on-site and so, in such cases, developers would be required to contribute to a Carbon Offset Fund. This Fund would be used by the council to facilitate off-site renewable energy schemes, improvements to the existing housing stock to reduce carbon emissions and tree planting, resulting in substantial benefits to the borough. The level of payment and further guidance on achieving zero carbon would be set out in a supplementary planning document. This option would require non-domestic developments to achieve BREEAM “excellent” standard.

FOR ALL OPTIONS

A size threshold in terms of the number of dwellings or amount of non-residential floorspace at which the policy applies would be set to ensure compliance with the Core Strategy and Rural Issues Plan which states that the policy in the Allocations and Designations Plan should relate to “local development or site specific opportunities”.

OTHER MAIN OPTIONS CONSIDERED

Rather than setting policies in this Plan, another option could be to rely on the existing policy in the Core Strategy and Rural Issues Plan. This is not an acceptable approach, as the Core Strategy and Rural Issues Plan itself refers to the need to set

more detailed policy in a later Plan and this approach is encouraged in national planning guidance.

An addendum to the sustainability appraisal of the Draft Plan has been produced for this paper. For both Options CC1 and CC2 It shows the following effects on sustainability of the options –

Mostly positive and major positive effects due to increased use of renewable energy and construction of sustainable buildings. No negative effects.

Consultation questions

- 1. Do you agree that using the Code for Sustainable Homes and BREEAM is the best way to improve the sustainability of new buildings? If not, what approach would you suggest?**
- 2. Do you prefer:**
 - a) **Option CC1 (Code level 4 and BREEAM “very good”) – the minimum improvement over existing requirements.**
 - b) **Option CC2 (Code level 4 plus zero carbon, Carbon Offset Fund and BREEAM “excellent”) – the best improvement in terms of cutting carbon emissions without increasing development costs unreasonably.**
 - c) **Some other alternative (please specify)?
Please explain your answer.**
- 3. At what size thresholds should the policy apply?**
 - a) **20 dwellings / 0.6 ha and 1000 sq m for non-domestic development.**
 - b) **10 dwellings / 0.3 ha and 1000 sq m for non-domestic development.**
 - c) **5 dwellings / 0.15 ha and 1000 sq m for non-domestic development.**
 - d) **Some other threshold (please specify).
Please explain your answer.**

MONITORING AND DELIVERY

The council will monitor:

- New residential developments to ensure compliance with the Code for Sustainable Homes by the use of planning conditions.
- New non-domestic developments to ensure compliance with the Building Research Establishment Environmental Assessment Method (BREEAM) by the use of planning conditions.
- If a policy threshold is set, the proportion of developments that do not have to comply with the policy.