

## **Matter 13 – Other policies**

### **Issue**

Whether the Local Plan is justified, effective and consistent with national policy in relation to waste management, flood risk and water management, minerals, energy and environmental and amenity protection.

Relevant policies ENV1 to ENV8

### **Questions**

Renewable and low carbon energy development (ENV7)

***13. What is the basis for the requirements for allocations and other major development proposals to meet 10% of energy needs from renewable and/or other low carbon energy sources or to reduce carbon emissions by at least 10% when measured against Building Regulation (Part L)? How would it be implemented in practice?***

1. This policy states that major development in all locations outside of the strategic allocations will be required to meet at least 10% of their energy needs from renewable and / or other low carbon energy sources or to reduce their carbon emissions by at least 10% when measured against Building Regulation (Part L) requirements. Strategic allocations should seek to reduce carbon emissions and maximise opportunities for the use of decentralised energy systems.
2. As set out in the NPPF<sup>1</sup>, the planning system should support the transition to a low carbon future in a changing climate and any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.
3. The PPG<sup>2</sup> sets out that any local requirements for a building's sustainability and for zero carbon buildings should be based on robust credible evidence and tested for impacts on viability. The PPG<sup>3</sup> also clarifies that locally set energy performance standards for new housing should not exceed the equivalent of Level 4 of the Code for Sustainable Homes and any requirement for a proportion of used energy to be from renewable and / or low carbon energy sources should be reasonable.
4. Therefore, whilst the Council's policy approach in ENV7 is commendable, it should not undermine the Government's intention to set energy efficiency standards through the Building Regulations via the 2021 Part L Interim Uplift (effective from June 2022) / 2025 Future Homes Standard, to provide electric vehicle charging points under Part S of the Building Regulations (effective from June 2022) and water efficiency standards in Part G of the Building Regulations.
5. The HBF notes that Government has now published an update to Building Regulations Part L. The publication of the new Approved Documents for Part L (conservation of fuel and power) and F (ventilation) reflect the interim uplift to Building Regulations on the

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<sup>1</sup> Paragraph 152 and 154b of the NPPF 2021

<sup>2</sup> PPG ID: 6-009-20150327

<sup>3</sup> PPG ID: 6-012-20190315

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journey to the 2025 Future Homes Standard. As the government announced in its response to its Future Homes Standard consultation in January this year, new domestic dwellings will need to achieve a 31% improvement in carbon emissions against Part L 2013. These regulations came into force on June 15th 2022. Transitional arrangements dictate that each individual building or property will need to be registered with the Building Control body and require a “meaningful commencement of construction” within 12 months of the implementation of the Approved Document.

6. It is noted that within the Local Plan Viability Report Addendum (2022) that in considering the increased costs in relation to the updates to Part L the Addendum considers that as a cost has already been included for complying with ENV7 that the full costs of Part L do not need to be included. The HBF is concerned that this may not be reflective of the costs of this policy and is very reliant on the energy efficiencies being provided through the use of renewables rather than reducing carbon emissions below the building regulations. However, the HBF is concerned that it will not always be possible to utilise renewables, and that if the energy hierarchy is followed it is more appropriate to increase energy efficiency rather than use renewables. The HBF considers that the viability of this policy requirement may need to be reconsidered or that the Council may need to consider again the requirements of this policy. Particularly in light of the Government's changes to Building Regulations and the move towards the Future Homes Standard.
7. The HBF considers that tackling climate change by promoting greater energy efficiency via a nationally consistent set of standards and timetable, which is universally understood and technically implementable, is the most appropriate way forward. The Future Homes Standard will ensure that new homes will produce at least 75% lower CO2 emissions than one built to previous energy efficiency requirements. By delivering carbon reductions through the fabric and building services in a home rather than relying on wider carbon offsetting, the Future Homes Standard will ensure new homes have a smaller carbon footprint than any previous Government policy. In addition, this footprint will continue to reduce over time as the electricity grid decarbonises.
8. On 27 July 2021, the Future Homes Delivery Plan<sup>4</sup> was published (click for the link to [The Future Homes Delivery Plan](#) – Summary of the goals, the shared roadmap & the Future Homes Delivery Hub). To drive and oversee the plan, the new delivery Hub will be launched in September, with the support and involvement of Government. The Hub will help facilitate a sector-wide approach to identify the metrics, more detailed targets where necessary, methods and innovations to meet the goals and the collaborations required with supply chains and other sectors. It will incorporate the needs of all parties including the public and private sector and crucially, consumers, such that they can all play their part in delivering environmentally conscious homes that people want to live in.
9. The HBF considers that the Councils should comply with the Government's intention of setting standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of individual Council's specifying their own

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<sup>4</sup> <https://www.futurehomes.org.uk/delivery-plan>

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policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. The Council should not need to set local energy efficiency standards to achieve the shared net zero goal because of the higher levels of energy efficiency standards for new homes proposed in the 2021 Part L uplift and the Future Homes Standard 2025.

***14. How has the effect on viability been taken into account and is the approach justified and consistent with national policy?***

10. The HBF is concerned that the effect on viability has not been properly considered, as set out above.

***15. Is the approach to renewable and low carbon infrastructure justified and consistent with national policy?***

11. The HBF is concerned that the approach to renewable and low carbon infrastructure is not justified, as set out above.
12. The HBF also does not consider it is necessary for large scale schemes to consider the use of district heat networks. 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.
13. 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.