Matter 13 – Climate Change

14.1 Is the suite of Policies CC1 to CC3 (as proposed for modification) a sufficiently comprehensive response to this issue?

1. The HBF considers that climate change is not an issue that can just be addressed by three policies and is in fact a consideration that needs to be incorporated and considered throughout the Plan. This can include reducing the need to travel, providing active and sustainable travel options, providing opportunities for renewable and low carbon technology, providing multi-functional open spaces, along with considering the design and layout of developments. The HBF does have concerns with some of the elements of the policies CC1 to CC3 these are set out in more detail in response to the following questions.

14.2 Does the approach of Policy CC1 to renewable and low-carbon energy generation and storage appropriately reflect national policy?

2. This policy looks for new buildings to reduce carbon emissions by 28% through the provision of renewable and low carbon technologies or through energy efficiency measures.

3. As set out in the NPPF[1], 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.

4. The PPG[2] 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[3] 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.

5. Therefore, whilst the Council's policy approach in CC1 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. 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 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.

[1] Paragraph 152 and 154b of the NPPF 2021
[2] PPG ID: 6-009-20150327
[3] PPG ID: 6-012-20190315

6. 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.

7. On 27 July 2021, the Future Homes Delivery Plan[4] 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.

8. The HBF considers that the Council 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 policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. The Council should not need to set local carbon reduction 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.

9. The HBF propose that the policy is modified as follows:

- ~~*'New buildings must achieve a reasonable reduction in carbon emissions of at least 28% unless it can be demonstrated that this is not viable. This should be achieved through the provision of renewable and low carbon technologies in the locality of the development or through energy efficiency measures. Proposals for how this will be achieved and any viability issues should be set out in an energy statement.'*~~

14.3 Is the approach of Policy CC2 to sustainable design and construction justified? This policy requires new dwellings to meet the optional higher national housing standard for water consumption and to achieve a 19% reduction in the dwelling emission rate.

10. All new homes already have to meet the mandatory national standard set out in the Building Regulations (of 125 litres/person/day), which is a higher standard than that achieved by much of the existing housing stock. If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, then the Council

[4] https://www.futurehomes.org.uk/delivery-plan

should justify doing so by applying the criteria set out in the PPG. The PPG[5] states that where there is a clear local need, local planning authorities can set out policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day. In order to introduce the policy the local planning authority must establish a clear need based on: existing sources of evidence; consultations with the local water and sewerage company, the Environment Agency and catchment partnerships; and consideration of the impact on viability and housing supply of such a requirement. The PPG[6] goes on to suggest the types of evidence which might support a tighter water efficiency standard including the identification of areas of serious water stress, or a river basin management plan which highlights the pressure that the water environment faces.

11. As set out in the NPPF[7], all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned. Therefore, a policy requirement for the optional water efficiency standard must be justified by credible and robust evidence. The HBF is unaware of any evidence to support the introduction of the optional standards. Yorkshire Water and York are not considered to be an area of Water Stress as identified by the Environment Agency[8]. Therefore, the HBF considers that requirement for optional water efficiency standard is not justified nor consistent with national policy in relation to need or viability and should be deleted.

12. As set out above Government have intended the amended Building Regulations to be the applicable standards, for example in relation to the Emission Rate, and local planning authorities should not be seeking to require additional standards over and above this requirement.

13. The HBF propose that the policy is modified as follows:

- ~~*'Proposals will be supported where they meet the following:*~~
  ~~*All new residential buildings should achieve:*~~
  ~~*i. at least a 19% reduction in Dwelling Emission Rate compared to the Target Emission Rate (calculated using Standard Assessment Procedure methodology as per Part L1A of the Building Regulations 2013); and*~~
  ii. ~~*a water consumption rate of 110 litres per person per day (calculated as per Part G of the Building Regulations)'.*~~

14.4 Will Policy CC3 be effective in its approach to district heating and CHP networks?

14. The HBF is concerned by the prioritisation of combined heat and power networks and the limited flexibility within this policy. Heat networks are one aspect of the path towards

[5] PPG ID: 56-014-20150327 and ID: 56-015-20150327
[6] PPG ID: 56-016-20150327
[7] Paragraph 31
[8] 2021 Assessment of Water Stress Areas Update:
https://www.gov.uk/government/publications/water-stressed-areas-2021-classification

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.

15. 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.

16. Therefore, the HBF would seek flexibility within this policy, to allow for developments to utilise the most appropriate heat and energy source for that development, taking into consideration sustainability, feasibility and viability.