Winchester Local Plan EIP

Matter 11: Carbon Neutrality and designing for low carbon infrastructure

Issue: Whether strategic policy CN1 and policies CN2-CN8 would provide an effective policy framework to ensure the Plan mitigates and adapts to climate change and in this regard whether they would be justified, effective and consistent with national policy?

Strategic Policy CN1 Mitigating and adapting to climate change

1. What is the robust evidence to justify the approach taken in strategic policy CN1 in setting out the overall strategy to achieve net zero and address climate mitigation and adaptation?

For Council.

2. Would the policy strike the right balance between mitigating and adapting to climate change and ensuring delivery of the required level of growth within the Plan period, with particular regard to viability? Would it provide appropriate flexibility in this regard?

HBF recognise it is important for new homes to reduce their carbon emissions and to adapt to the effects of climate change. Broadly speaking CN1 provides the framework for those objectives. However, our concern is that the Council is seeking to implement policies CN2, CN3 and CN4, which require housebuilders to deliver building standards that are in excess of what is required by current building regulations as well as the proposed Future Homes Standard. HBF's position is that the most effective approach to reducing carbon emissions from new homes while maintaining the delivery of those homes is through building regulations and the delivery of the Future Homes Standard (FHS). This standard has been developed by Government in consultation with the industry and a wide range of other stakeholders through the Future Homes Hub to ensure that not only carbon emissions from new homes are reduced to 75% and are zero carbon ready – meaning they will emit no CO_2 once the national grid decarbonises – but also that the proposed regulations are deliverable. In addition, the phased introduction of improvements through building regulations of the improvements to part L will mean that there is sufficient labour with right skills alongside more developed supply chains to ensure the standard is deliverable from when it is implemented – something that cannot be said of the Council's proposed standard.

3. In seeking to minimise carbon emissions would the policy accord with national policy as set out on the WMS published on 13th December 2023.

A key focus of the WMS is to ensure that there is consistency in how building standards in relation to reducing carbon emissions are implemented and how this avoids the complexity of having multiple standards that in turn harms economies of scale. However, the WMS does not prevent Councils setting standards beyond those in building regulations but does place caveats on how this is achieved. Not only does it require higher standards to be viable and deliverable but also that they are expressed and calculated in a way that is consistent with building regulations. Seeking to minimise carbon emissions is therefore consistent with the aim of the WMS but the more detailed approach to achieving that, which is set out in policy CN3 using a standard proposed by LETI, is not consistent with the approach in the WMS.

Policy CN2 Energy hierarchy

1. Would policy CN2, when read with strategic policy CN1, serve a clear purpose?

HBF's position is that the most effective approach to reducing carbon emissions is through building regulations. Whilst the energy hierarchy is a helpful tool that the council could encourage developers to follow, we do not consider it necessary for it to be included as a policy in the local plan.

2. Would it be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals? In particular, would more explanation of appropriate interventions at each stage of the hierarchy be necessary for effectiveness?

If the policy is to be retained it would be beneficial for more clarity to be included in the local plan as to how this can be achieved

3. Should policy CN2 refer to the positive aspects of spatial planning that would help reduce energy consumption, with particular regard to travel demand?

No comment.

4. In seeking to minimise carbon emissions would the policy accord with national policy as set out on the WMS published on 13th December 2023?

The WMS provides clarity as to how building standards relating to energy efficiency should be approached by local planning authorities and was made to address the confusion as to what improvements above building regulations could be set within local plans. The starting point of the WMS is that plan makers should not set energy efficiency standards for building that go beyond current or planned building regulations and clarifies that new homes built to future building standards will be zero carbon ready to ensure that they have zero carbon emissions as the grid continues to decarbonise. Policy CN2 does not establish higher standards, which are set out in CN3, and as such the energy hierarchy in CN2 merely provides a framework within developers should consider how to improve energy

efficiency and reduce carbon emissions. Therefore, this specific policy is not inconsistent with the WMS or wider aims in national policy of reducing carbon emissions.

Would the policy appropriately address heritage assets when a fabric first approach may not always be appropriate? In this regard would reference to all development be justified, effective and consistent with national policy?

No comment.

Policy CN3 Efficiency standards to reduce carbon emissions

1. What is the robust evidence to justify the stated energy efficiency requirements for all new residential development which would go beyond those of the Future Homes Standard? Would they accord with national policy? Given technological and infrastructure and other possible constraints would the policy be justified and effective?

The Council set out their position in the Net Zero Carbon Targets paper published in June 2023 (Ref: CN13). This paper sets out national and local context for reducing carbon emissions. HBF does not disagree with the need for new homes to reduce their carbon emissions in response to the climate. It is also recognised that Councils can go beyond minimum standards where there is robust evidence to support such an approach. This is clarified in the WMS with Councils having to show that development will remain viable and that the impact on housing supply and affordability is considered.

A significant part of our concern with the policy is that not consideration has been given as to the impact of this policy on the delivery of new homes and the cost of new homes. HBF could not find any conclusive evidence to show that the standards being proposed can be delivered from the point at which the plan is adopted without impact on the rate at which new homes will come forward. While paragraph 5.12 of the CN13 highlights that there are developments at master planning and pre-construction phase but not information is provided to show that this has not impact on housing supply and the rate at which new homes will come forward in WCC. HBF are concerned that the skills and supply chains to support this policy may not be in place to support the proposed level house building in Winchester, at least not in the short to medium term.

As set out in our representations HBF are concerned that there would appear to be a discrepancy in the cost of achieving the energy use and space heating levels required by this policy. HBF note that the Future Homes Hub have produced some evidence which indicates that homes designed to achieve the similar standards to those required by this policy show costs that are significantly higher than that set out Ready for Zero considers the increase in costs above 2021 building regulations is between 15% and 19% higher than current building regulations compared to the 5.8% suggested for housing development used in the Viability Report (paragraph 3.31) which is based on evidence in CN13. Therefore, should the cost assumption in CS13 underestimate the cost of meeting this standard there is a significant risk that the local plan will not be deliverable.

2. What is the robust evidence to justify the way in which the energy efficiency requirements for all new residential

development are expressed? In this regard, would policy CN3 accord with national policy?

The justification for using the proposed is that energy use as predicted through standard such as PHPP and CIBSE54 is a more accurate assessment of energy use and indicator of whether a development is aligned with meeting net zero. This approach is inconsistent with national policy which not only requires an additional requirement to be expressed as a percentage uplift of a dwellings Target Emission Rate as calculated using the Standard Assessment Procedure (SAP). While the Council maybe of the opinion that alternative assessment may be an improvement on SAP this is not considered to be a robust justification for departing from national policy and key aspect of that policy which is to ensure consistency between building regulation and any higher standard required by a local plan and avoid a proliferation of alternative standards.

3. What is the robust evidence to justify the requirement for 100% on site renewable energy for energy consumption?

For Council.

4. How have viability considerations been reflected in policy requirements, including any impacts on affordable housing provision and delivery?

For Council.

5. Would the policy be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?

No comment.

6. In referring to all new residential development rather than dwellings, would the policy be clear in its intention to require individual dwellings to be net zero? Would such an approach be justified by robust evidence?

It is not clear whether the policy relating to operational net zero and the energy standards in the policy relate to individual homes or the site as whole. Given that some types of housing are intrinsically more energy efficient than others it makes sense that it would be the development as a whole that meets the proposed standards rather than each individual unit.

7. What would be the effective monitoring and compliance mechanisms to ensure the successful implementation of the policy without hindering development progress?

The most effective approach would be a for any requirement above building regulations to be based on the TER and assessed using SAP.

Policy CN4 Water efficiency standards in new developments

8. Would the water efficiency requirements accord with national policy, which sets a standard of 110 litres per person per day in water stressed areas?

No. The 100 lppd is below the minimum optional standard set out in PPG.

9. Given policy CN4's approach, what is the robust evidence to justify a standard below the Environment Agency's guidelines on Water Efficiency and Planning, published 18/08/2023 and below that set out in the building regulations? In this regard would the policy be effective?

For Council.

10.Given the viability implications of policy requirements, should the requirements be phased to ensure the right balance between safeguarding future water supply and ensuring planned growth is delivered within the Plan period? Would the policy provide necessary flexibility in this regard?

The standard should be set at 110 lppd. Should improvements to water standards be required then these will be established through building regulations to ensure that they are deliverable.

11. Would the policy be clearly written and unambiguous, so it is evident how a decision maker should react to development proposals? In particular, in relation to all new residential development... 'unless it can be demonstrated that this is not feasible...'?

No comment

12. To ensure effectiveness, would a commitment to provide additional guidance on water efficiency be required?

Should the policy be considered sound further guidance would be necessary to support applicants and decision makers in achieving this standard.

13. How have viability considerations been reflected in this policy?

For Council.

Policy CN8 Embodied Carbon assessment

1. Would this policy serve a clear purpose in accordance with NPPF paragraph 16? In its aim to reduce embodied carbon, in the absence of clear targets would the policy be effective?

HBF considers policies requiring a carbon assessment to be premature given the difficulties in accurately assessing

carbon and the lack of a national policy framework in relation to embodied carbon.

2. Given concerns regarding the amount and quality of data across the construction industry on the embodied carbon of any inputs, would the policy be justified and effective?

The quality of the data available is a concern that will impact on the effectiveness of such policies and confused decision making should similar developments arrive at different conclusions with regard to embodied carbon and the degree to which reductions can be achieved.

3. Would CN8 provide adequate detail on the process of producing an embodied carbon assessment, so as to ensure effectiveness?

No comment.

4. Given the requirement for information on materials and construction methods, at what stage would an embodied carbon assessment be required? And would policy CN8 be clear in its requirements in this regard?

For Council