

Issue 5: Are the policies to respond to climate change justified and deliverable?

Is Policy CP2 sound?

- 1) RPS endorses the Inspector's comments in respect of Policy CP2 and contends that the locally imposed Code for Sustainable Homes targets be removed on the basis that the Council has failed to justify the targets, thereby conflicting with the Supplement to PPS1 (paragraph 31). It would be a dangerous precedent if these local targets were retained within the Core Strategy as they have the potential to stagnate growth. It is more appropriate that the Core Strategy advocates the national standard, as set out in the Building Regulations. It is important to bear in mind that national standards are already accepted as being optimistic; not least because of the current market conditions but because technology required to render Code for Sustainable Homes level 4 and above are difficult to achieve without major public subsidy.
- 2) RPS acknowledges that the BREEAM and/or Code for Sustainable Homes assessments are valuable mechanisms for assessing the sustainability credentials of proposals, however, the requirement for BREEAM and/or Code for Sustainable Homes pre-assessments to be prepared in respect of all major development proposals at the planning application stage is unduly onerous and is not justified. The requirement is not proportionate as it takes no account of outline or hybrid planning applications relating to large strategic sites where most of the relevant information required to satisfy the BREEAM and/or Code for Sustainable Homes pre-assessment is not available. Therefore, if this requirement was to be maintained, applicants of outline or hybrid applications will incur additional costs and will need to confirm additional detail relating to the proposals beyond what is helpful to establish the principle of development,
- 3) The Bristol Core Strategy contains a similar requirement at the planning application stage and in applying adopted Policy BCS15 Officers at the Council acknowledge that the requirement is not suited to outline or hybrid applications where details are reserved. It would be more appropriate to require full planning applications to submit BREEAM and/or CfSH pre-assessments and for such assessments to be secured via condition in respect of major outline and hybrid applications.
- 4) It is submitted that local CfSH targets be removed from the Core Strategy and further clarification on the types of planning application that will be required to prepare BREEAM and/or Code for Sustainable Homes pre-assessments in order to ensure that the policy is effective. This would be consistent with the approach in Bristol City.

Is Policy CP4 sound and how does the policy relate to other policy requirements for sustainable construction?

- 5) RPS considers the provisions of Policy CP4, as currently worded, to be unsound on the basis that the District Heating requirements are not based upon a robust evidence base (justified) nor are the proposals effective as it is not clear how it will be implemented, bearing in mind that substantial CHP and district heating networks are not yet in place and that a flexible approach will be required over the lifetime of the plan. The installation of enabling infrastructure for district heating represents a major cost burden upon developers with no guarantee that the infrastructure will ever be required; surely it makes more sense to invest in

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other forms of infrastructure and to make more sustainable use of materials until such time as a working system is in place? Secondly, given the potential time-lag in delivering an operational district heating system over the plan period and potential technological advancements, it may be the case that facilitating infrastructure delivered by proposals early in the plan period may be obsolete, inefficient or unsuitable when a system does eventually become operational.

- 6) The high level of uncertainty surrounding the delivery of a district heating system also impacts upon the delivery of the CfSH targets set out in Policy CP2. A working district heating system would assist in meeting the CfSH targets however it is not clear when an efficient district heating system will be implemented. Therefore, the potential delays in implementing a district heating system also illustrates the difficulties faced in viably implementing the CfSH targets set out in Policy CP2.

- 7) Having regard to the above, it is submitted that Policy CP4 is amended to reflect that whilst the provision of infrastructure to facilitate district heating in the future will be encouraged by the Council, it will not become a requirement even in the district heat priority areas. This can later be revisited as part of the proposed reviews of the Core Strategy.