

## Three Rivers District Council Core Strategy

### Statement in Response to Matter 3: Sustainable Development (CP1)

#### 3.11 Are the requirements set out in Policy CP1 'Requirements for applicants' justified, up to date and consistent with national policy?

3.11.1 Yes.

3.11.2 The Council have been using C-PLAN Energy and Sustainability Statement (C-PLAN) since April 2008 to communicate and test the policy requirements of CP1 to local developers.

3.11.3 C-PLAN is essentially a carbon assessment and monitoring tool which gathers the energy and sustainability data of development applications and provides a consistent method of assessing and verifying the extent to which development proposals accord with the sustainability objectives, policies and targets of the Core Strategy.

3.11.4 Essentially C-PLAN provides:

- Consistent data capture
  - clearly defined information requirements
- Efficient assessment for development proposals against policies and targets
  - assessment against robust, reliable baselines and benchmarks
  - proposals are challenged for technical, practical and planning suitability
- Flexibility
  - can be adapted to policies with different targets defined by development type/scale/location
- Accessible data for monitoring and reporting on effectiveness of policies
- Feasibility checklists for different renewable and low carbon energy technologies
- Allows developers and DM Officers to share the same data and calculations
- A free facility for the developer - we pay the licence fee and provide the developer with a login password.

3.11.5 Our policy requires development proposals to meet specific on-site CO<sub>2</sub> reduction target and in order to show compliance with policy the applicant must provide energy data to the Council as evidence of measures to achieve this target. C-PLAN defines the level of information required to support a planning application, and the format in which this is to be provided to the Council to enable compliance with policy to be assessed.

3.11.6 C-PLAN assists the developer to provide all the relevant and sometimes complex information required, (such as calculations to measure a buildings energy demand and rating) in a consistent and transparent manner to the Development Management Officer who can then accurately assess whether or not the proposals comply with the policies. This tool provides clarity and certainty to developers and planners.

3.11.7 The use of this tool enables the implementation of climate change policies to be effective and avoid undue delay and inefficiencies for applicants and planning officers. It also provides transparency for other stakeholders by making complex technical issues more readily understood and ensures consistency in the evaluation of evidence and supporting information. By presenting the outcome of interactions

between building energy efficiency, energy demand and energy supply as simple graphical outputs, C-PLAN provides an easily understood comparison of the energy demand and carbon footprint of a development proposal with the target levels of performance in the Council's policy.

- 3.11.8 The use of C-PLAN also assists in collecting relevant information for the purpose of monitoring policy implementation. The Climate Change Supplement PPS stresses the importance of monitoring the impacts of climate change policy to ensure the desired outcomes are achieved. Where complex technical issues are included in the development process, such as carbon reduction measures, it is important that monitoring and analysis of the final outcome of planning decisions is included in the development management process.
- 3.11.9 The successful use of C-PLAN has been recognised by other Hertfordshire local authorities who have expressed a desire to subscribe to the service. C-PLAN is also currently being used by other authorities including Reigate and Banstead, Woking and Dacorum councils.

### Policy Targets

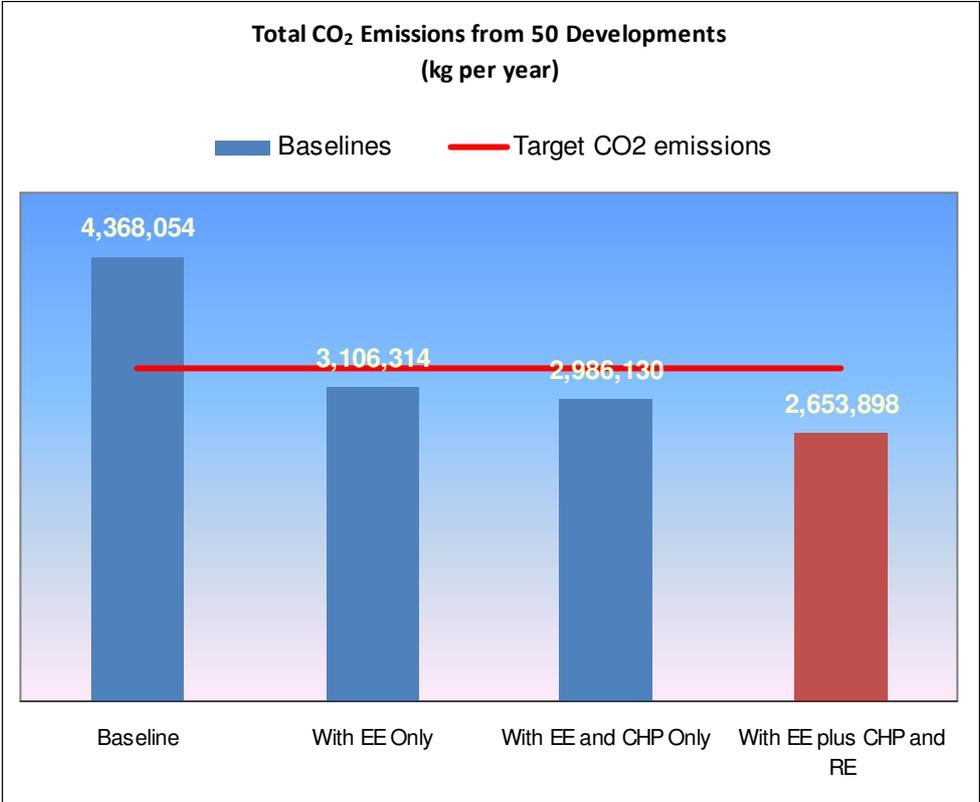
- 3.11.10 Planning Policy Statement 22: Renewable/ Energy established a requirement for target and criteria based policies for on-site renewable energy generation and that LPA's:
- Can require a percentage of the energy to be used in new residential, commercial or industrial developments to come from on-site renewable energy development, through maximising opportunities for small scale renewable energy (Paragraph 8),
  - Should specifically encourage small scale renewable energy schemes (solar panels, biomass heating, small scale wind turbines, photovoltaic cells and CHP) in all new developments (Paragraph 18).
- 3.11.11 Planning Policy Statement 1: Delivering Sustainable Development (2005) requires that Core Strategies should provide a framework that promotes and encourages renewable and low carbon energy generation (Paragraph 19) and expect a proportion of the energy supply for new development to be secured from decentralised and renewable or low carbon sources (paragraph 20).
- 3.11.12 The targets in CP1 are measured against CO<sub>2</sub> reductions as:
- It is the principal cause of climate change, rather than energy use
  - By reducing on-site CO<sub>2</sub> emissions rather than energy use it provides far more flexibility to the developer in the solutions applied
  - This is the form of metrics used in other standards such as Building Regulations, Code for Sustainable Homes and the Government's zero carbon policy ambitions.
- 3.11.13 The policy uses the Building Regulations 2006 Part L as a baseline against which applications for development can be assessed. The policy is flexible as it does not prescribe the methods or technologies to be used to achieve the policy targets, so developers can choose between a mixture of energy efficiency measures and carbon saving energy technologies. The policy acknowledges the importance of renewable microgeneration technologies and the establishment of 'community' low carbon energy supply systems and encourages the use of all such low carbon

energy technologies, including specific reference to CHP (combined heat and power).

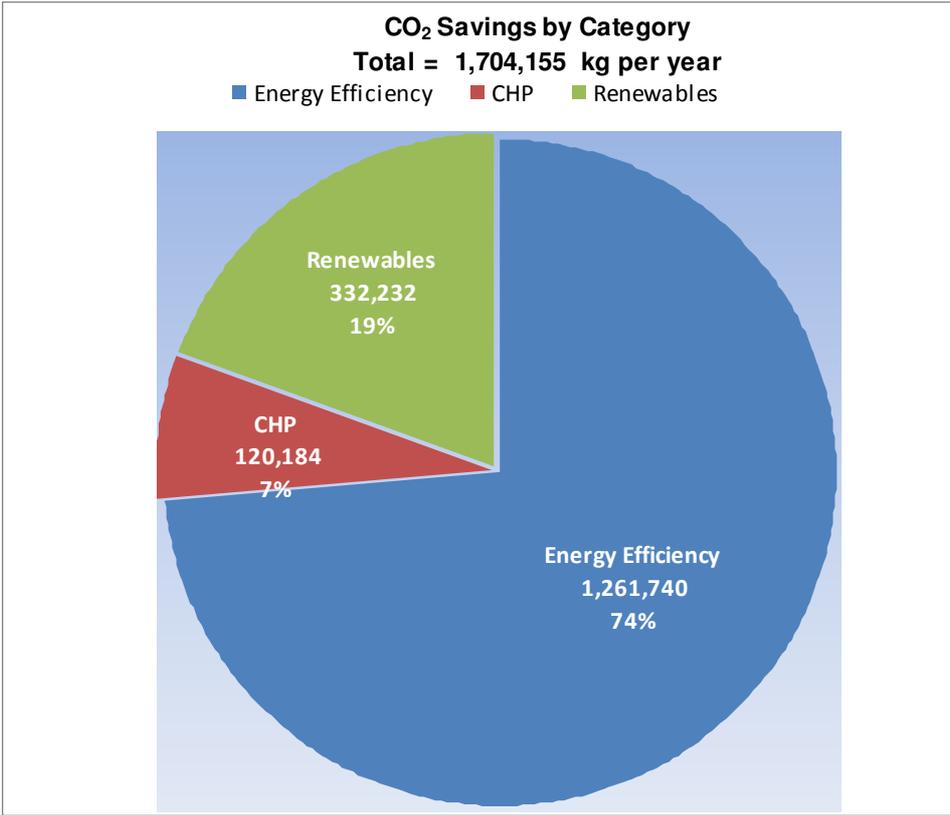
- 3.11.14 With regards to District Heating Systems (DHS) and Combined Heat and Power (CHP), CP1 does not exclude these as options. The policy states that the Council will consider connection to a local, decentralised, renewable or low carbon energy supply, which includes by definition DHS and CHPs.
- 3.11.15 DHS are most suited to large scale developments with at least 50dph. CABB consider that they are most appropriate for large scale developments such as neighbourhoods and recognise that they may also be viable for smaller sites of between 200-250 homes.
- 3.11.16 The Hertfordshire Renewable and Low Carbon Energy Technical Report [EB23] (paragraph 4.1 to 4.3) discusses the suitability of these technologies for new and existing developments. It concludes that the viability of DHS and CHP schemes for new development depends on what the alternative options are to achieve the required CO<sub>2</sub> reductions.
- 3.11.17 As development sites in Three Rivers are generally small in nature (between 1 and 25 dwellings) and the Core Strategy identifies only two development sites that could potentially be large enough to make a DHS viable, we do not consider that the policy should prioritise decentralised energy opportunities as a primary CO<sub>2</sub> reduction mechanism.
- 3.11.18 The requirement that at least 10% of the carbon emission savings are obtained from on-site renewable/low carbon technology has evolved from a number of consultations and the evidence obtained from C-PLAN since April 2008. In the Core Strategy Issues and Options document (July 2006) [SD07 page20], we suggested that all new major development ensured that at least 20% of energy requirements were met through renewable/low carbon energy sources and there was strong support for this which is shown in the Report of Public Consultation (2006) [SD08 page19].
- 3.11.19 In April 2008 we piloted C-PLAN with the requirement that at least 10% of the carbon emission savings are obtained from on-site renewable/low carbon technology in line with the draft staggered policy that appeared in the Core Strategy Preferred Options (February 2009) [SD03 page 109]. The target of 20% for on-site renewable/low carbon energy generation would be applied in 2013 in line with the then national and regional targets as it was expected that new technologies would be available to make this achievable at that time.
- 3.11.20 Since its introduction the energy demand and carbon emissions, of a wide range of development proposals has been assessed via C-PLAN. These have included residential schemes ranging from a single unit to over 100 new dwellings, new retail food stores, offices and a large extension to a school.
- 3.11.21 The evidence gathered to date has demonstrated the viability of developments that have used renewable/low carbon technologies in conjunction with enhanced level of energy efficiency, and the policy has proven to be effective in stimulating investment in low and zero carbon energy generation in the District. Of the 50 development proposals assessed via C-Plan, only two have failed to meet the policy target.
- 3.11.22 On aggregate all the schemes have achieved a reduction in the level of carbon emissions of approximately 34% compared with the level of emissions that would

have arisen if the council had not sought to implement this target, equivalent to over 1.5 million kg CO<sub>2</sub> per annum. This demonstrates the effectiveness of this policy as a tool in securing improvements in building design and performance beyond the minimum sought by the council, and those set by Building Regulations 2010. Graphs detailing the total CO<sub>2</sub> emissions from these developments together with the methods/technology used are shown at the end of this document.

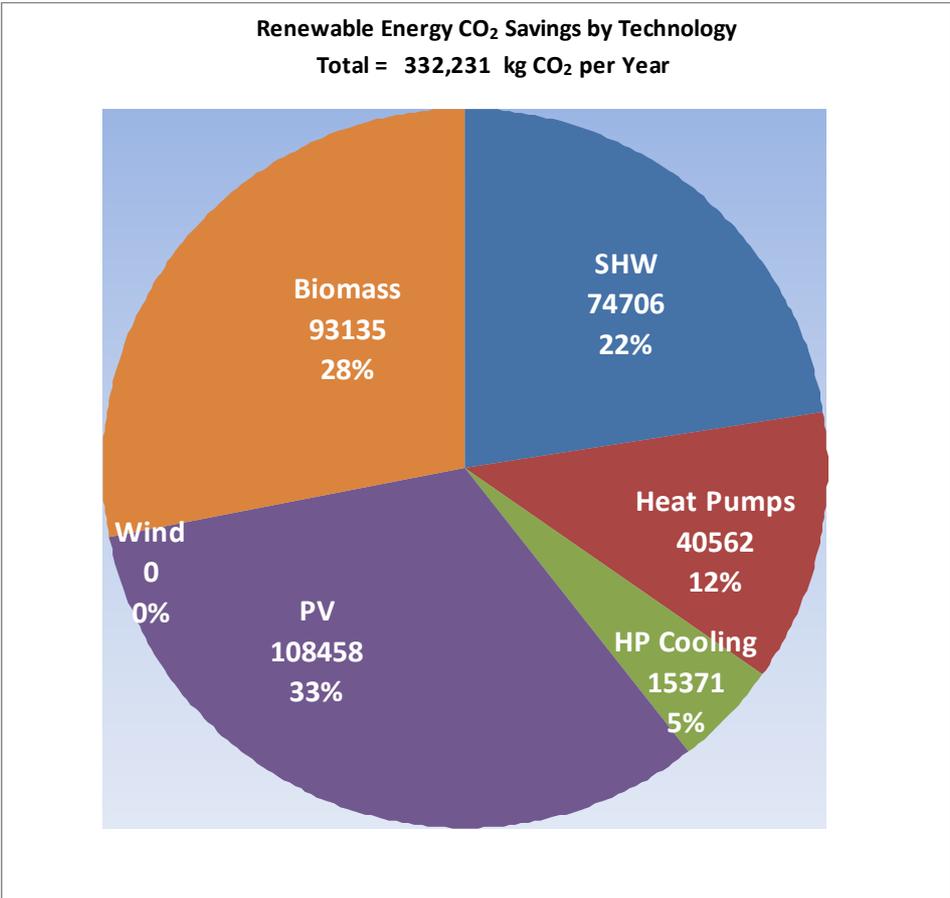
- 3.11.23 Policy CP1 states clearly that higher targets for carbon reduction and energy contributions from renewable/low carbon sources will be set out in the Development Management Policies DPD. These will also be informed by management information from C-PLAN to ensure that any targets set are feasible – both financially and technologically.
- 3.11.24 It should also be noted that the Building Regulations are not an effective process in securing improvements above the minimum defined within the regulations. The evidence we have shows that by adopting a policy target within the planning process we have been able to secure, through negotiation, consistently higher levels of performance in excess of the minimum standards set by Building Regulations 2010. The evidence shows we have achieved 34% improvement over Building Regulations 2006 which is higher than that required by the recent revision to the Building Regulation in 2010 which only requires 25%.
- 3.11.25 Given all these factors, it is considered that the ‘requirements for applicants’ set out in Policy CP1 are justified, up to date and consistent with national policy and represent the most appropriate strategy to ensure that new development contributes to the sustainability of the District.



EE = Energy Efficiency    CHP = Combined Heat & Power    RE = Renewable Energy



CHP = Combined Heat & Power



SHW = Solar Hot Water  
PV = Photovoltaic

HP Cooling = Heat Pump Cooling