

Tuesday 8 Feb – Matter 4: Sustainable Communities & the Environment

Issue 1: Is Policy 2 justified, effective, and consistent with national policy?

9. Is it justified for Policy 2 to require new development to provide a 19% reduction against Part L of the 2013 Building Regulations? The policy states that it will apply to “all new development” – is this justified?

Green Party response:

It is encouraging to see targets of energy efficiency beyond minimum requirements, and it anticipates stricter future requirements through the “Future Homes Standard”. The [Tyndall Centre climate commitments for Broadland](#) indicate the need for an immediate programme of CO₂ mitigation to deliver cuts in emissions averaging a minimum of -13.0% per year to deliver a Paris aligned carbon budget. In 2020, the residential sector was responsible for [20.8% of all UK emissions](#) (excluding emissions from energy use). Given this critical need to improve energy efficiency it is absolutely clear that ambitious targets of energy efficiency and carbon reduction are necessary and entirely justified. In December 2021, the government has indeed amended part L to provide an interim uplift in energy efficiency which requires a 30% reduction in carbon emissions of new-built residential buildings and a 27% reduction of non-residential buildings, so going far beyond the 19% suggested in the GNLP (and therefore highlighting the limited ambitions of the GNLP in relation to achieving net zero). However, [consultation responses](#) to this amendment of part L overwhelmingly asked for a far higher reduction than the 27% - 30% implemented by the government. This again demonstrates the suggested 19% in the GNLP is far from what industry and other experts deem necessary to achieve net zero.

What is also not so clear in the plan is how such energy efficiencies are to be monitored to ensure they are actually achieved in practice?

The Target Fabric Energy Efficiency (TFEE) in Part L 2013 regs will be assessed alongside the carbon a home produces per m² per year. It is understood that an ‘elemental recipe’ of a prescribed set of U values for roofs, walls, floors and glazing will give an acceptable TFEE figure. This mix can be quite variable and so will have to be carefully planned, checked and then monitored to ensure agreed standards are met in practice.

Embodied Carbon emissions

An issue that is not addressed at all in the plan is that of embodied carbon emissions. Embodied Carbon emissions are the greenhouse gas emissions and removals associated with materials and construction processes throughout the whole life cycle of an asset as defined in the [RICS professional statement: Whole life carbon assessment for the built environment](#).

Embodied Carbon emissions are not yet included in current Building Regulations but there have been proposals to do so – see [Part Z](#). The proposal is to outline requirements on the assessment of whole life carbon emissions, and limiting of embodied carbon emissions, for all major building projects. If adopted, it would

rapidly accelerate the voluntary action occurring across the construction industry, leading to green investment and green jobs creation across construction.

The need to introduce carbon regulation called for by the Climate Change Committee is [supported](#) by industry leaders.

As this proposal sits under Building Regulations, the assumption is that compliance would be signed off by Building Control Officers. Sign-off could be achieved following reviewing the final material quantities and Environmental Product Declarations used in the construction.

Resources to ensure compliance

All the above is necessary if we are to achieve Net-Zero in the timeframes required and proposed by government. It will inevitably put additional pressures on both development and building control which are under resourced. So, as well as the ambition it is whether the implementation can be realistically and consistently achieved. Unfortunately, the plan does not identify the resources required to achieve the stipulated objectives.

10: Is it justified for Policy 2 to require ‘appropriate’ non-housing development of more than 500 square metres to meet the BREEAM “Very Good” energy efficiency standard, or any equivalent successor? How will it be determined whether a proposal is ‘appropriate’ in this regard?

Green Party response:

The BREEAM standard is a widely used and well accepted standard to reduce carbon emissions and its aim is to achieve zero carbon. Under this [standard](#) a rating can have one of 6 classifications: outstanding, excellent, very good, good, pass or unclassified (which is the equivalent of a fail). A BREEAM rating of very good signifies advanced good practice and broadly represent a building that falls amongst the top 25% of non-domestic buildings in terms of sustainability performance. [In the period between 2013 and 2015](#), this meant that a rating of ‘good’ signified an average CO2 emission saving of only 15%, while a rating of ‘outstanding’ achieved an average of 66% saving. The data also highlights that achieving a rating of ‘very good’ is associated with a 0.1% to 0.2% increase of capital cost for non-residential developments. This highlights that requiring a rating of ‘very good’ against BREEAM standards is entirely appropriate on substantial non-housing developments, as these developments will determine the country’s ability to achieve net zero. Given the challenge of achieving net zero, the speed at which this needs to be achieved, the longevity and substantial contribution to local emissions of large developments, a standard of at least ‘excellent’ should be required, which is associated with a cost increase of between 0.4% to 1.8%. This would still be a justifiable cost increase, considering the consequences of not decarbonizing at pace and the potential need to retrofit new developments which do not adhere to higher sustainability performance standards. In addition, these higher sustainability requirements come with substantial long-term benefits in terms of asset value preservation or increase, reduction in energy and operating cost, and an improvement in reputation. The government’s [common minimum standard](#) for public projects already requires any new projects to achieve an ‘excellent’ rating. This standard was published in 2012, ten years on with much more awareness and urgency in relation to the climate and ecological emergency this ‘excellent’ rating should be the minimum standard for all new projects, not only publicly funded projects.

11. The explanatory text states that master planning using a community engagement process will be required on sites for more than 500 dwellings or 50,000 square metres. However, the policy wording does not refer to this requirement. The policy wording does however refer to master planning being encouraged on larger sites and particularly for proposed developments of 200 dwellings or 20,000 square metres plus. Should the policy be modified to address this inconsistency? Does the policy need to be made clearer in this regard to be effective?

12. Is it clear what form any master planning and community engagement is expected to take? Has any such requirement been considered in the assumed lead-in times for the delivery of larger sites?

Green Party response:

Community engagement on whatever size of development is essential but has been historically poor. As elected members on city, district and parish councils we know that many residents and parish councils feel ignored and developments bulldozed through whatever the result of community expressed concerns. There are clear examples of community petitions and representations that have not been adequately responded to in a respectful and constructive way. This is partly due to the centralized planning system itself but also due to the lack of allocated resources for effective community engagement. We, therefore, agree that a much clearer consistent policy for all developments needs to be developed for different scales of development and sufficient timescales identified and allocated for effective community engagement to take place and for community opinions and feelings to be acted upon.

Issue 2: Is Policy 3 justified, effective and consistent with national policy?

4. Map 8A sets out the Green Infrastructure Corridors in the Plan area. These are not reflected in Policy 3. How do these corridors relate to Policy 3? Should the policy include provision to preserve and enhance the Green Infrastructure Corridors?

Green Party response:

We agree that the Green Infrastructure (GI) Corridors are mapped and mentioned in Policy 3 but there is little in the way of defining what a GI Corridor is expected to achieve and how such corridors work in practice. Experience of current practice suggests corridors can be easily broken through a lack of recognition they exist and, if they do exist, how they should operate and be maintained. Further clarification of the role and functioning of GI corridors is required to ensure they do play an effective role in biodiversity preservation and the maintenance of green spaces.