

2

Topic Paper 2 Climate Change and Sustainability

Crawley Borough Council adopted its Core Strategy back in November 2007, providing the spatial vision, objectives and development strategy for Crawley up to 2016. The Council has now begun preparing the successor to the Core Strategy – the Core Strategy Review – which will cover a much longer period up to 2026. Although there are aspects of the original Core Strategy that can be retained there are other areas where significant change has occurred in the intervening years and this will need to be reflected in the new document.

This consultation period is the first of the Review and further consultation stages are planned before the document is adopted in early 2012. This is your opportunity to shape the way the town develops over the next 20 years and the Council would appreciate and value any comments you have on this Topic Paper or any of the others that form part of this consultation.

Summary of the Current Context

Climate change and sustainability are key issues that cut across the whole of the Core Strategy Review. It is a priority for central Government and legislation and guidance is therefore rapidly changing. In particular, Planning Policy Statement 1: Delivering Sustainable Development (PPS1), new building regulations and mandatory assessments such as the Code for Sustainable Homes, have confirmed the role of local authorities in meeting this new challenge.

The Crawley Borough Core Strategy had originally contained two policies that dealt with sustainable design and construction. However, after the Examination in Public the Inspector removed the policies as they were not considered to be locally specific and did not adequately demonstrate why they were needed.

Since then, the Council has adopted its Corporate Climate Change Strategy with a commitment to becoming a carbon neutral town by 2050. This complements the aspirations of the Local Strategic Partnership in the Sustainable Communities Strategy.

Indication of the Key Issues Relating to Climate Change and Sustainability

- The main issue is to ensure that the Council is clear about what it requires from new development, and why. Any policies should ensure that developers are clear about any additional standards, thresholds and targets and when they apply.
- This Topic Paper will also ensure we can have early input from those that use the planning system about how we can make this complex, cross-cutting and critical

area of policy easy to use without restricting innovation and technological developments.

CO2 reductions or renewable targets

- The Core Strategy Review will need to consider energy consumption. At this stage there are two main options. Either the requirements for a reduction in CO2 must be met, or that a set amount of low or zero carbon energy is provided. This will also need to be considered against emerging best practice and standards. We will also need to consider how we provide supporting information to make sure we are clear about what we want and why.

Offsite provision or onsite provision

- A key issue is whether developments should be allowed to offset their CO2 outside of the development boundaries. Options could include renewable energy being produced off site, or contributions being made towards funding a large/wider scheme that will benefit areas outside of the development boundary. This option would need to be supported by clear guidance about when other alternatives to providing on site are allowed.

Borough wide blanket policy or site specific targets

- The policies should also consider whether we have a blanket approach/target for the whole Borough or one that defines special areas that require an even higher target. These areas could be where larger scale growth has been identified or key areas such as the Town Centre and Manor Royal where the density and mix of new development proposals may make such measures feasible and viable. The continuing evidence base will need to qualify which areas could be appropriate and why.

Core Strategy Review blanket wide policy or timed/phased targets

- The policy also needs to consider whether we set a single target across the whole of the plan period to 2026 or if we look at requesting a staged/phased approach with targets getting higher over time. Again, this will be developed in line with the evidence base.

Development wide blanket approach or specific development thresholds

- The Core Strategy Review needs to make clear which types of development need to comply with the new sustainability policies. For instance, a policy could be applied that only relates to residential or commercial development. Alternatively, a policy could be related to floorspace or the number of dwellings. Definitions could be included that make

requirements only for major or significant development, and a definition of such terms will need to be included. The alternative approach is that all development (and this may include extensions or single dwellings) need to meet any climate change targets.

Viability and deliverability

- Any policy will need to ensure that it is easy to understand and can be deliverable in terms of the technological requirements placed upon the development. It must also ensure that it does not make the development unviable. The Borough's sustainability requirements must be met alongside any other planning obligations such as affordable housing and therefore, the evidence base will seek to understand how the Council can assist developers in balancing all obligations.

Indication of the Options for Addressing the Key Issues Outlined Above

The Core Strategy Review policies consider:

CO2 reductions or renewable targets

- Should the policy prescribe that sustainable development means cutting CO2 emissions by a set amount? Or should it look at fixing an amount of energy that should be provided through renewable sources?
- What measures can and should we be taking as a Local Planning Authority?

Offsite provision or onsite provision

- Should we allow the option of paying into an offset fund? Should this be allowed all the time or just in exceptional circumstances? What if it is not technically or feasibly viable on site, or should it all be provided on site?

Borough wide blanket policy or site specific targets

- Is it right and appropriate for Crawley to set higher targets than national guidance?
- Should we have an area based policy that places higher targets in identified areas such as Manor Royal, Town Centre, Three Bridges Corridor, and areas identified for growth, or just have one that treats the whole town the same?

Core Strategy Review blanket wide policy or timed/phased targets

- Should the Council set the same targets across the whole plan period or look at introducing a phased approach like the one for Building Regulations?

Development wide blanket approach or specific development thresholds

- Should we have a blanket wide policy

that asks all development to comply or should we require only some to meet our targets? For example should we only look at residential or only larger developments over 10 dwellings or 1000sqm?

Viability and deliverability

- How can we work and assist developers in dealing with the viability of their schemes? What information do we need to ask for, or provide for them? How can we look at sustainability requirements alongside other planning obligations such as affordable housing?

Indication of the Potential Direction at this Stage

- Crawley Borough Council is committed to setting local targets and raising the bar above national requirements. It is suggested that this could be done by setting a requirement for all development to meet a CO2 emission target.
- It is suggested that the Council should require that all targets must be met within the development boundary itself and not off site.
- As a cross cutting issue, the policy should include references to:-
 - Energy - green sources and minimising use
 - Biodiversity
 - Water efficiency
 - Waste reduction and recycling
 - Energy from waste
 - Travel and access
 - Sustainable construction
 - Sustainable design
 - Water management
- The policy should look at how climate change issues are considered for all new development regardless of size or location.
- The policy could set out higher targets and/or time frames in certain areas within the town.
- The Core Strategy Review policies will need to set out the mechanisms that will be used to deliver and support the policy. This may include the provision of an Energy Services Company, the use of S106 agreements, or the provision of energy centres throughout the town.
- The policy must consider how the delivery of a sustainable development may affect other planning obligations and the viability and deliverability of schemes.



Main Issues for Consultation

- As a cross-cutting issue, should sustainability be a priority in assessing new developments across the town and, if so, what targets or time periods should be used to phase in the requirements?
- What areas of sustainable design and construction should be covered?
- How can we assist developers to understand our requirements and ensure that they are met, whilst being viable, deliverable and achievable?

Current Context

Climate Change Bill

- The Act creates a new approach to managing and responding to climate change in the UK through: setting ambitious targets, taking powers to help achieve them, strengthening the institutional framework, enhancing the UK's ability to adapt to the impact of climate change, and establishing clear and regular accountability.

Planning Policy Statement 1: Planning and Climate Change

- PPS1 sets out the Government's overarching planning policies on the delivery of sustainable development through the planning system.

Supplement to Planning Policy Statement 1: Planning and Climate Change

- The supplement to PPS1 on Planning and Climate Change sets out the Government's national policies on how planning should contribute to the

mitigation of, and adaptation to, climate change and identifies a number of key planning objectives for both regional and local planning.

- It sets out local requirements for decentralised energy to supply new development, and states that local planning authorities should set out a target percentage of the energy to be used in new development to come from decentralised and renewable or low-carbon energy sources where it is viable.
- In addition, the PPS recommends that "where there are particular and demonstrable opportunities for greater use of decentralised and renewable or low carbon energy" they should prepare development area or site-specific targets to secure this potential.

Planning Policy Statement 22: Renewable Energy

- Current national planning policy on renewable energy is set out in PPS22, which is also accompanied by technical

guidance in a Companion Guide 'Planning for Renewable Energy'.

- As part of a broader framework for delivering renewable energy through the planning system, it calls for positive planning policies at regional and local levels, encouraging the use of the full range of available renewable resources. It requires targets to be expressed as the minimum amount of installed capacity for renewable energy in the region (and sub region where appropriate), and emphasises that targets must not be regarded as a ceiling for development; rather they should be reviewed regularly and revised upwards as they are achieved, or become close to being achieved.

Planning Policy Statement 9: Biodiversity & Geological Conservation

- PPS9 sets out planning policies on protection of biodiversity and geological conservation through the planning system.

Planning Policy Statement 25: Development and Flood Risk

- Sets out that flood risk must be taken into account at all stages of the planning process in order to avoid inappropriate development in areas at risk of flooding.
- Where development in a flood risk area is unavoidable, and justified via the exception test, appropriate flood mitigation measures should be undertaken.
- Development should not increase flood risk elsewhere.

Building Regulations Part L

- Part L of the Building Regulations relates specifically to dwellings. It controls the insulation values of building elements; the allowable area of windows, doors and other openings; air permeability of the structure; the heating efficiency of boilers and the insulation and controls for heating appliances and systems together with hot water storage and lighting efficiency. It also sets requirements for SAP (Standard Assessment Procedure) and Carbon Index ratings for dwellings. Further regulations also require the advertising of these ratings.

Code for Sustainable Homes

- The Code for Sustainable Homes sets out standards for sustainable home building practice. Dwellings are given a rating (from Code Level 1 up to Code Level 6) depending upon their performance in nine separate categories. Whilst certain categories are mandatory (e.g. energy and water efficiency) in order to be given a rating, further points are available for meeting the other categories (e.g. Pollution, Ecology) although developers have some choice as to which of these they choose to apply.

BREEAM

- BREEAM (BRE Environmental Assessment Method) is the most widely used environmental assessment method for buildings. It sets the standard for best practice in sustainable design and has become the measure commonly used to describe a building's environmental performance.

South East Plan Proposed Modifications

- The South East Plan Proposed Modifications identifies that sustainability and climate change must be dealt with as an overarching theme that impacts on all development. It recommends that a CO₂ emission reduction approach is utilised with a focus on how developments can mitigate against climate change. The plan sets a regional CO₂ target of reducing CO₂

emissions by 20% by 2010, and 25% by 2015.

- The South East Plan Proposed Modifications requires local authorities to include how they will tackle climate change in their own strategies and plans, and supports cross cutting policies for sustainable construction, access & movement policies, density and design, use of existing stock, energy, water efficiency waste reduction and recycling, as well as ecology.

Crawley Borough Core Strategy

- Sustainability is one of the Planning and Development Themes of the adopted Core Strategy. The strategy highlights the role of the planning system in securing or encouraging sustainable development, with regard to its location, design and efficient use of natural resources.

Crawley Borough Local Plan

- There are also a number of policies of relevance to this Topic Paper that were saved from the Local Plan:
 - STRAT 1
 - STRAT3
 - GD1-Requirements for all development,
 - GD3-Operational Requirements,
 - GD5-Landscaping and development,
 - GD13-Specific Sustainability measures
 - GD15- Specific Sustainability measures
 - GD23-The water environment

Evidence Base

Energy Centre for Sustainable Communities: (ECSC) Sustainable Energy Evidence Base (2009)

- This study is currently looking into the potential and opportunity for carbon reducing technologies across the Borough and what areas, thresholds and targets may be suitable and appropriate.

ECSC: Planning and Climate Change in Crawley (2008)

- The consultants report considers the role of Crawley Borough Council as both a planning authority and as a corporate entity in tackling climate change. It looks at how the Council can do this and what other local authorities are doing.
- The report also assesses the merits of different types of low and reduced carbon technologies.

ECSC: Policy Review Document (2009)

- In 2009, ECSC also undertook a full report of best practice from other Local Authorities and criteria base approaches to policies.

ECSC: Energy Services Company and other Mechanisms (2008)

- A report assessed the opportunities for the Council to develop an Energy Services Company and the other mechanisms available including S106 Agreements.

Crawley Borough Council: Corporate Climate Change Strategy (2008)

- The strategy aims to achieve zero neutrality by 2050 for both Council operations and the town itself.

Planning Policy Officers Group (PPOG) Study

- Crawley Borough Council is supporting a cross-authority study which is looking into the potential and opportunity for carbon reducing technologies across West Sussex.

Regeneris Report (2008)

- This assessed the opportunities and challenges facing Manor Royal.

Manor Royal Regeneration Improvement Project

- The project is developing how Crawley Borough Council identifies a strategic way forward for the Manor Royal Industrial area.

National Indicators 185,186 and 188

- The indicators assess the CO₂ reductions of the town, the Borough Council and its adaptability to Climate Change. The Council is also monitored on these indicators.