

Matter 5 Statement – Cllr Sarah Warren

Context

Bath & North East Somerset Council declared a climate emergency in 2019, and an ecological emergency in 2020, because of the enormous dangers posed to humanity (including residents of Bath and North East Somerset) by the environmental threats of rising global temperature, and the decline of the natural world on which we depend.

It is disappointing that the process of plan preparation set by government is so slow that, three whole years on from that first declaration, we have only just now been able to reach the examination stage of the update to planning policy that we made in response that declaration. It is also shocking that, despite the minor and incremental nature of the changes we feel permitted under planning law to propose in response to the greatest threat humanity has ever faced, there is a chance that the inspector may still find that they are overly onerous on developers and reject them. What does that say about the seriousness with which our government takes the environmental threat to its electorate (and their children), or about the fitness for a climate emergency of national planning policy?

Q's 87-91: Policy SCR6

I welcome updated policy SCR6 the Sustainable Construction Policy for New Build Residential Development, as the UK has some of the leakiest housing in Europe in terms of heat loss. This policy will result in improved housing performance and reduced household bills for those fortunate to move into new build housing, at this time of rapidly rising fuel costs, and high and increasing rates of fuel poverty.

Setting energy performance targets will ensure that any new homes we build are fit for the future, and post construction quality assessment should be used to ensure the high sustainability standards set by policy are actually implemented in the real world.

Otherwise, we will continue to build new homes in the full knowledge that, as the keys are handed over for the first time, they will already be costing their new owners too much to heat, and already require deep retrofit with energy efficiency measures to achieve efficiency in line with the UK's national target of net zero by 2050 – let alone our local target of 2030, which comes much closer to compliance with the requirements of the Paris Agreement and the vital need to cap global heating at 1.5°C above pre-industrial levels. The proposed new energy metric will allow for much better monitoring and reporting of household energy performance.

The targets we are looking to set are wholly achievable and reasonable, as the same targets are already in place in Cornwall. In fact, I would argue that we should definitely go further, matching the more ambitious target recommended by the Committee on Climate Change of a space heating requirement of 15-20 kWh/m²/yr, as found in West Oxfordshire and proposed for Central Lincolnshire and Greater Cambridgeshire. Why could we not go further still, requiring full Passivhaus

standard, already widely used in the UK, which ensures occupant comfort with next to no heating bills?

It is also essential that we immediately require the elimination of gas boilers from all new build, as new build is the sector of the housing stock in which it is easiest and cheapest to build in the energy efficiency to support this using building fabric as part of the original build, and alternative heating technologies are widely available now.

The costs of not implementing these measures today are **much greater** than the costs of doing so – whether in the retrofit costs that will be paid by the new occupants, or the incalculable financial costs that will be required globally to pay for runaway climate change. As a rich country, the UK should be leading the world on this, not finding excuses.

The purpose of seeking a financial contribution, where the use of onsite renewables to match total energy consumption is not technically feasible or economically viable, is to ensure that for both residential and non-residential buildings, this approach must be seen only as a last resort when the carbon/energy targets have not been met due to on-site difficulties.

The primary purpose of offsetting in these policies is to ensure that there is sufficient incentive for developers to meet carbon/energy reduction targets through on-site measures, and it is therefore an essential part of the policy to ensure that where a development cannot technically or feasibly meet targets through on-site measures, the developer can still comply with the policy through a financial contribution that will be spent by the Council on projects that eliminate any residual emissions from the development.

Q's 92-95 Policy SCR7

I also welcome policy SCR7, the Sustainable Construction Policy for New-Build Non-Residential Buildings, as net zero regulated operational emissions is a step forward. Policies to promote and support the clean energy transition need to be as ambitious as possible now, rather than delay refinement until adoption of the next Local Plan.

I believe the policy could and should go further through the inclusion of unregulated energy in the target, and also by requiring a CIBSE overheating assessment to ensure that the new building can accommodate the projected temperature increases. I also believe the policy should go further by setting specific targets for on-site energy efficiency and renewable energy generation measures to meet a minimum amount of the 100% reduction. And once again in non-residential buildings, why can we not aspire to Passivhaus standards?

Q's 96-97: Policy SCR8

I very much welcome the introduction of Policy SCR8, Embodied Carbon, which is a good start in addressing embodied carbon in our building stock, but is insufficiently ambitious, failing to provide sufficient motivation on developers to retain and retrofit existing buildings (with lower carbon emissions), rather than knock down and start afresh (resulting in higher emissions). The basis for the targets is well understood and readily achievable. Based on the available evidence, this target could and should go further, by aiming to tighten standards within the plan period if supported

by evidence – which would have the effect of bringing down embodied carbon emissions more significantly.

The proposed policy only currently requires an embodied carbon assessment for RIBA stages A1 – A5, but does not require the B (operations/maintenance) and C (end-of-life/disposal) stages to be accounted for. Therefore it could also go further in terms of including B and C stages to account for all stages of a building's lifetime. It should also be extended to apply to all developments, rather than just to larger ones

Q's 78-86: Policy CP3

I welcome the introduction of policy CP3, which will make onshore wind energy possible in Bath & North East Somerset again, after it was effectively banned by earlier changes to the National Planning Policy Framework – whilst facilitating an increase in solar provision more effectively.

We currently have around 28MW of installed renewables capacity in B&NES. The target in our planning policy set in 2014 is 110 MW, whilst the capacity indicated by our climate emergency declaration is 350MW. You can see from those figures just how far short of the necessary capacity we are, and how rapidly we need to accelerate installations, if our district is to play our part in ensuring that the Paris Agreement objective of limiting global heating to just 1.5 degrees above pre-industrial levels is hit.

You must remember that planning is not the only constraint on the location of renewables installations. A very important factor is the limited capacity of the electricity grid locally, which varies from location to location, with connections to the grid only possible in some places. We therefore need to ensure that planning is as a facilitative as possible, so as not to create additional constraints for willing landowners.

We fully acknowledge that a mix of technologies is required, partly for resilience, with wind frequently producing energy at different times from solar; and that solar will tend to be a more appropriate technology than wind across many parts of our district, for a number of reasons. Nevertheless, we need to ensure that we facilitate wind, the most cost effective technology, in all those places where it is suitable. I understand that our approach to wind power is a flexible one, as we are very keen to ensure that as few areas of the district as possible are ruled out.

And as far as solar is concerned, the figures I mentioned a moment ago speak for themselves – our renewables capacity currently stands at less than 10% of the capacity indicated by our climate emergency declaration, and less than 30% of the target set 8 years ago in planning policy, so we need to ensure we facilitate installation of this technology wherever other factors such as grid capacity, landowner enthusiasm, lower agricultural productivity, and lower visibility permit. We need to be able to tuck solar farms in behind any hill or a hedge anywhere in the district, not just in the areas of search. CP3 restricts the ability to find optimal sites for large scale solar, so does not fully meet the need for facilitating solar provision and protecting B&NES residents against severe climate change. In the face of the exceptional threat to life from the climate emergency, it is also vital that we have the ability increase solar provision above our Park and Ride car parks, which is why it is so essential to release them from the Green Belt through this update to local planning policy.

Summary

Thanks for allowing me to speak to you. In summary, I am extremely supportive of the direction of travel of these proposed changes to planning policy but feel very strongly that they do not go far or fast enough in the face of the rapidly accumulating scientific evidence of a threat to our civilisation from global heating. It is vital that these changes are permitted through this examination process, as a precursor to still stronger measures which are required to support the Paris Agreement objectives.