

View Comment

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Comment ID /3008

Respondent [Campaign to Protect Rural Engl...](#)

Response Date 27 Mar 2020

Current Status Awaiting Processing

Response Type OBJECT

What is the nature of this comment?

Object

Summary Predicted energy requirement set too low, and amendments to 38.3 38.4 recommended.

Comment 1.The requirement to achieve at least 10% of predicted energy requirements is too low, given the Government's legally binding commitment to achieving net zero emissions by 2050, and is inconsistent with the draft plan's 'Spatial Objective 10: **.minimising** and adapting to impacts of climate change'.

2. Instead, the policy should require zero carbon emissions from energy used in homes and other buildings within all new developments. To be achieved by the provision of renewable and low carbon energy supply systems, including solar panels, ground and/or air source heat pumps, smart-grids and low-carbon storage systems to manage energy demand and supply, local heat and heat networks, and by building houses that are truly energy efficient(See for example: 'North West Bicester Supplementary Planning Document, February 2016', cited as a case study in TCPI and RTP1: 'Rising to the Climate Crisis.- A Guide for Local Authorities on Planning for Climate Change',2nd Ed., Dec 2018).

2.1 The requirement to achieve zero carbon emissions should be expressed as 'must achieve', not 'expected to achieve'.

3, We recommend that “All new major development will be expected to incorporate . .” be replaced with “All new major developments must incorporate” And that Policy 38.3 be amended to read “In order to ensure that climate change is fully addressed, all applications for residential or commercial development must include an Energy Statement demonstrating how compliance with the Heating/ Cooling hierarchy has been achieved, together with a detailed assessment of the proposed scheme’s energy demand and carbon dioxide emissions.”

4. We are concerned that Policy 38.4 “Where compliance with the Heating/ Cooling hierarchy has not been possible, a contribution into a Carbon Offset fund will be sought to work towards achieving carbon neutrality, unless it can be demonstrated that the scheme is not suitable, feasible or viable for this form of energy provision”, might undermine HDC’s ability to ‘tackle climate change’. Schemes that are unable to comply with the ‘Heating/Cooling hierarchy’ should therefore be refused.

Proposed Change

1.The policy should require zero carbon emissions from energy used in homes and other buildings within all new developments by the provision of renewable and low carbon energy supply systems, including solar panels, ground and/or air source heat pumps, smart-grids and low-carbon storage systems to manage energy demand and supply, local heat and heat networks, and by building houses that are truly energy efficient.

2.Policy 38.3 be amended to read “In order to ensure that climate change is fully addressed, all applications for residential or commercial development must include an Energy Statement demonstrating how compliance with the Heating/ Cooling hierarchy has been achieved, together with a detailed assessment of the proposed scheme’s energy demand and carbon dioxide emissions.

Attachments