

TOPIC PAPER 2: Climate Change and Sustainability

The way that the whole town develops in the future will be affected by planning decisions. Crawley Borough Council has started work on a new local plan that will help to guide development in Crawley over 15 years from 2014-2029.

This consultation period forms part of the early engagement, and further consultation stages are planned before the document is adopted in 2014. Comments received to earlier consultation periods, including to the Topic Papers in 2009, the Town Centre North Supplementary Planning Document and the Manor Royal Masterplan, will continue to be taken into consideration, alongside the technical evidence base, when formulating the Local Plan Preferred Strategy. The Preferred Strategy will be made available for a further period of consultation later in 2012.

This is your opportunity to shape the way the town develops 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.

Consultation Questions:

CC1. 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?

CC2. What areas of sustainable design and construction should be covered?

CC3. How can we assist developers to understand our requirements and ensure that they are met, whilst being viable, deliverable and achievable?

Summary of Current Context:

Climate change and sustainability are key issues that cut across the whole of the Local Plan. It is a priority for our government and legislation and guidance is therefore rapidly changing. In particular, Planning Policy Statement 1: Delivering Sustainable Development (PPS1), the draft National Planning Policy Framework, emerging new Building Regulations and assessments such as the Code for Sustainable Homes, and BREEAM have confirmed the role of Local Authorities in meeting this new challenge.

The Core Strategy had originally contained two policies that dealt with sustainable design and construction. However, after the Examination the Inspector removed the policies as they were not considered to be locally specific. Since then, the Borough Council has adopted its Corporate Climate Change Strategy with a commitment to becoming a carbon neutral town by 2050. This sets out areas where the town will focus on carbon reduction and local opportunities in doing so.

The council has amassed a substantial evidence base which explored the potential for Crawley to deliver carbon reductions through low and zero carbon and decentralised energy networks. Studies indicate locations where decentralised energy could be economically viable, and would contribute to the Corporate commitment.

Adapting to climate change and delivering sustainable development relies on implementing a range of measures including:

- Energy – green sources and minimising use
- Biodiversity

- Water efficiency
- Waste reduction and recycling
- Energy from waste
- Travel and access
- Sustainable design
- Sustainable construction
- Water management

Crawley's Climate Change and Sustainability policy will address all these issues. This consultation asks what level of detail should be applied to each issue, and the appropriate scope of the policy.

Key Issues:

The main issues is to ensure that the Borough 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 and why they apply to their proposals.

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.

Low Carbon Energy or renewable targets

- The new policies within a Local Plan will need to consider how developments use and consume energy. At this stage it is not expected that overly prescriptive targets will be set within policy but that a reduction in CO₂, or an amount of low or zero carbon energy is provided. This target will 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 offsite, or contributions being made towards funding a large/wider scheme that will benefit areas outside of the development boundary. It could be that particular environmental projects are funded to save CO₂ across the Borough.
- The policy could also consider whether other sustainability issues such as water and waste efficiency or biodiversity are on- or off-site.

Borough wide blanket policy or site specific targets

- The policy should also consider whether we have a blanket approach/targets for the whole Borough or one that defines special areas that require even higher targets? 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 new technologies or approaches such as decentralised energy networks, or the application of exemplar and Best Available Technologies feasible and viable. Information supporting any policy will need to qualify which areas could be appropriate and why.

Local Plan 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 2029 or if we look at requesting a staged/phased approach with targets getting higher over time. This may be linked to other mechanisms such as Building Regulations or the development of technologies or other developments.

Development wide blanket approach or specific development thresholds

- The Local Plan 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 an amount of floorspace or the number of dwellings. The alternative approach is that **all** development needs 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 financially unviable. The Borough's sustainability requirements must be met alongside any other planning obligations such as affordable housing and CIL therefore, the Local Plan will seek to understand how the council can assist developers in balancing all obligations.

Options:

The Local Plan policies should consider:

CO2 reductions or renewable energy 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 low carbon or renewable sources?
- What measures can and should we be taking as a Local Planning Authority?
- Should we apply policy requirements and/or targets to all issues included in this Topic, or just low/zero carbon energy solutions? Or a selection? Which issues would most benefit from a target to achieve the sustainability objectives of the council?

Offsite provision or onsite provision

- What if sustainability/carbon reduction measures are not technically or feasibly viable on-site? Or should all measures be provided on-site? Should we allow the option of paying into a "green bank" or offset fund? Should this be allowed all the time or just in exceptional circumstances? When should this be?

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?

Local Plan 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 link the one for Building Regulations or Code for Sustainable Homes?

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? What could the threshold for larger developments be (and would this vary for different issues)?

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 Potential Direction:

- The Borough Council is committed to setting local targets and raising the bar above national requirements.
- 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 design
 - Sustainable construction
 - Water management
- The policy should look at how climate change issues are considered for all new development regardless of size or location.
- It is suggested that the Corporate objective to achieve carbon neutrality could be achieved by setting a requirement for **all** development to meet a CO2 emission target.
- It is suggested that the Borough Council should require that all targets must be met within the development boundary itself and not off-site.
- The policy could set out higher targets and/or time frames in certain areas within the town, especially if studies identify that there is potential to do so.
- The Local Plan 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 ESCo, the use of s106 or Community Infrastructure Levy (CIL) 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.

Evidence Base:

National

- Climate Change Act
- Draft National Planning Policy Framework
- PPS1
- PPS1 supplement: planning and climate change
- Working Draft with Communities and Local Government (online tool)
- PPS22 Renewable Energy
- PPS9 Biodiversity & Geological Conservation

- PPG24 Noise
- PPS25 Development & Flood Risk
- Building Regulations Part L
- Code for Sustainable Homes
- BREEAM

Regional

- South East Plan
 - Overarching Themes panel report page 37
 - CO2 emission reduction approach
 - Mainly mitigation focused
 - Regional CO2 target set 20% by 2010 25% by 2015
 - Use of Climate Change Mitigation and Adaptation Implementation Plan supported
 - Support green sector of the economy
 - Defra to monitor targets
 - Local Authorities to include their own strategies and plans
 - Support for 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
 - Again ensure South East Plan – noise and water covered.

Local

- Crawley Borough Adopted Core Strategy
 - Planning and Development Themes – Sustainability Objectives
- Saved Local Plan Policies
 - STRAT 1
 - STRAT 3
 - GD1: Operational Requirements
 - GD5: Landscaping and Development
 - GD13: Specific Sustainability Measures
 - GD15: Specific Sustainability Measures
 - GD23: The Water Environment
- Hurley Plamer Flatt
 - HPF: Decentralised Energy Study for Crawley (May 2011)
 - Identifying opportunities for supplying energy from low and zero carbon sources including district heating; and encouraging decentralised energy generation in new development through planning policies.
- Energy Centre for Sustainable Communities (ECSC) (July 2008)
 - ECSC: Feasibility for low and carbon reducing technologies across the Borough
 - This study which is looking into the potential and opportunity for carbon reducing technologies across the Borough and what opportunities are available.
- ECSC: Planning and climate change in Crawley (October 2007)
 - The consultants report addresses both the role of CBC as a planning authority and as a corporate entity to look at tackling climate change. It looks at how the council can do this and what other authorities are doing.
 - The report also looks at 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 their criteria base approach to policies.
- CBC: Corporate Climate Change Strategy (2008)
 - The strategy aims to achieve zero neutrality by 2050 for both council

operations and the town.

- Planning Policy Officers Group (PPOG) Work
 - CBC is supporting a West Sussex cross-authority study which is looking into the potential and opportunity for carbon reducing technologies across the County.
- Regeneris report
 - This assessed the opportunities and challenges facing Manor Royal
- GVA Grimley
 - Manor Royal Masterplan
- National Indicators 185, 186 and 188
 - The indicators assess the CO2 reductions of the town, the Borough Council and its adaptability to Climate Change.