

EXAMINATION OF THE REMITTED PART OF THE SALT CROSS VILLAGE AREA ACTION PLAN (AAP)

MATTERS ISSUES AND QUESTIONS

POLICY 2

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Introduction

These matters, issues and questions relate to the examination of the remitted Salt Cross Village AAP (the Plan). All documents can be found on the examination webpage on the Council's website.

Further information about the examination, the conduct of the hearing sessions and the format of any further written statements is provided in the Inspectors' Guidance Note.

ISSUE

Does the Plan set out an appropriate strategy to secure sustainable design and energy efficiency in new development and is it consistent with national policy.

General approach

1. Does policy 2 reflect the requirements of the Planning and Energy Act 2008?
2. The Plan proposes an energy metric based approach, a deviation from the December 2023 Written Ministerial Statement which requires that any additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP). Is this justified by the evidence?
3. Is the energy and cost modelling in the Net Zero Carbon Development Evidence Base (ED9B) for the zero carbon and low carbon scenarios robust in terms of its methodology and assumptions? What are the limitations?
4. How representative of the development envisaged in the Garden Village are the different typologies tested in the modelling?

5. Are the build costs uplift of 6.1% for zero carbon and 7% for low carbon justified by the evidence? Is this robust particularly when set against Savills research (June 2023) (paragraph 5.110 of the Viability Appraisal Update ED9A) which suggests this is higher for net zero homes, in the region of 10-14%?

Sustainability appraisal

6. Overall, does the SA Addendum (ED9C) adequately assess the environmental, social and economic effects of Policy 2 in accordance with legal and national policy requirements?

Viability

7. Is the Viability Appraisal (ED9A) robust and justified in its methodology and assumptions?
8. What evidence is there to support the eco premium applied to sales values?
9. In terms of the proposed employment uses in the Garden Village, the viability assessment is based on the provision of serviced commercial land. Is this an appropriate approach to take? What effect would speculative and pre let schemes make to overall viability?
10. The Viability Appraisal assumes an overall net to gross ratio of 31.6%. Is this appropriate to achieve viability and ensure the delivery of housing?
11. The assessment concludes that the development is unviable with an eco premium and policy compliant 50% affordable housing, though viability improves with a lower affordable housing contribution. How significant in terms of overall viability are the additional costs of achieving a net zero development? Are other factors such as increases in construction and infrastructure costs having a greater impact on viability? What effect does this have on housing delivery and affordability?

Policy 2 – Net Zero Carbon Development.

12. The first sentence of the policy requires that all development must achieve net zero operational carbon on site. Should the wording be more flexible recognising that this may not be achievable in all cases?

Building fabric

13. Are the space heating demand targets justified? Is the Policy effectively worded in stating a requirement that buildings must meet a space heat demand of <15-20 kWh/m².yr? Should the 'less than' symbol be removed from the policy wording?
14. Is the policy sufficiently flexible to address circumstances where a development cannot achieve the required space heating demand?

Overheating

15. The policy requires that at the outline planning application stage, mitigation should focus on orientation and massing. Is this justified in all cases such as where all matters are reserved except for access?
16. Does the Policy duplicate requirements under the Building Regulations? For example, is it necessary and justified to require a demonstration of compliance with Part O at detailed planning stage?

Energy efficiency

17. Are the sector specific EUI targets justified?
18. Is there a conflict between the wording of the policy and the supporting text which suggests the EUI figures are recommended targets not requirements? In particular is it appropriate that development 'should achieve' the target rather than seek to achieve it? Overall is this part of the policy effectively worded?
19. How does the policy address developments where the end user and therefore energy demand is unknown?
20. Is the policy effective in explaining when a validated predictive energy modelling approach would be required?

Fossil fuels

21. The policy requires development to be fossil fuel free. No oil or natural gas should be used for space heating, hot water, or cooking. Is this part of the policy effectively worded? Is it necessary for reference to be made to 'cooking' in the policy? Should this be in the supporting text?

Zero operational carbon balance

22. The policy requires that 100% of the development energy demand must be met through on site renewable energy eg solar PV. It goes on to state that where this is not technically achievable, it should be maximised on plot. Is the policy and or the supporting text effective in setting out what is expected of a developer?
23. Paragraph 5.50 as proposed to be modified, states that each building should generate as much renewable energy as possible and where the energy balance between predicted annual energy use and annual renewable energy generation cannot be achieved, it should be achieved elsewhere on site. As drafted, the policy and supporting text appear ambiguous. Is it expected that the operational balance will be achieved on an individual plot or within the wider Village. How is it expected that this will be delivered? What if this cannot be achieved?

Embodied carbon

24. How will the policy be applied in respect to embodied carbon when the end user and internal specifications may be unknown. Is the policy effective and justified?
25. Is the policy effective and justified in requiring embodied carbon calculations to be carried out at outline and detailed planning stages with full lifecycle modelling encouraged?

Energy strategy monitoring and verification

26. Is it clear to developers, decision makers and the community what would be expected in terms of an energy strategy at outline, detailed planning and pre commencement stages and validated pre occupation? What would be proportionate at each stage?
27. How will post occupation energy monitoring be achieved? How will this data be used, analysed and stored and by whom? How will it be shared among developers, designers and contractors? Is it appropriate and justified that this data is required annually for five years?

Schedule of proposed modifications

28. Document ED10 provides a schedule of proposed further main modifications and additional modifications. With the exception of MIN 1, 2 and 16, should the remaining additional modifications be classed as main modifications required for soundness? The heading in the third column of the table of additional modifications (page 8 of ED10) states 'Main Modifications'. Is this an error?