

Energy Alton response and recommendations on the EHDC draft local Plan

Energy Alton is a community environmental group of volunteers that helps householders save energy and reduce harmful carbon emissions whilst raising awareness about the extremely severe impact of climate change. We have extensive knowledge of national and international policy and implementation as well as many years of experience of local policy and energy saving action.

Challenges facing East Hampshire

The Plan in 1.14 says:

- *protect and enhance the area's biodiversity and habitats, including designated areas of national importance and positively plan for addressing the implications of climate change.*

This is a wholly inadequate expression of the challenge that climate change brings to us all. The world's leading climate scientists have warned that the impacts beyond 1.5°C of global warming could be catastrophic. By 2030 we will be experiencing more extreme weather leading to unprecedented flooding, extreme weather events including overheating especially of public buildings including schools.

In our recent public newsheet on climate change we quote the UN Panel on Climate Change: 'carbon emissions need to drop by 45% by 2030 for global warming to be kept to a maximum of 1.5 degrees'. The independent Committee on Climate Change that advises our own Government says that the rate of insulating homes in the UK is 95% lower than it was in 2012.

The EHDC Plan must declare this to be a significant challenge instead of a half sentence at the end. Otherwise readers will see it as an afterthought of no importance. Energy Alton can provide all the references required to fully inform the Council.

Vision and Objectives

The vision and objectives fail to quantify a positive response to climate change other than proposing to plan for people to rely less on their cars.

- Objective A2 should include support for economic growth for renewable energy technologies and more generally business that is leading to low carbon solutions.
- Objective B should clearly state that far more needs to be done to modify existing buildings to require less heating, lighting and cooling through better insulation and more efficient low carbon heating options.
- Leading authorities are adopting the values of a circular economy that is based on best use of resources, cutting waste, recycling and making the best use of land. This should be a central objective in this plan.

Sustainable and viable development

Energy Alton believes that clause S3.5 is totally unacceptable. This in effect says developers can negotiate a reduction in standards on grounds of financial viability. If the principles and objectives are agreed and design standards are set then they should be delivered. On this issue the LA must be firm. Research has shown that it is possible to build a zero-carbon home for £1000 per square foot. This is an obvious get out clause for developers who will use the pressure to meet the housing need to weaken the Authority's resolve. This should not be allowed to happen.

Green Infrastructure

We support the aims and policy statements in S23. But more needs to be said about the changing landscape aside from new building developments. Minor changes such paving drives and removing grassed verges collectively can have a big impact on green infrastructure increasing rain water run off and reducing green space.

Planning for Climate Change

Policy S24

The policy statements are acceptable but not sufficient to meet the Authority's own objective of mitigation, adaptation and resilience. The fact is that to meet the Government's own Climate Act all domestic buildings need to be carbon neutral by 2050. Since all new buildings in the lifetime of this plan will be still standing in 2050 it means that building standards need to be zero carbon. This is perfectly achievable and was the plan for 2016 until it was scrapped. The Authority must challenge government and developers to make this happen.

This section should include:

- Measures to reduce the reliance on fossil fuel intensive building materials. A ton of concrete gives off a ton of carbon to the atmosphere. Other materials should be substituted where possible.
- More intensive recycling of building and other materials
- There should be a preference to refurbish to the higher energy standards instead of new build.
- We would like to see the paragraph on designing buildings so that they can be kept cool without power to be included in S24

Renewable and low carbon Energy

Policy DM27

We like this comprehensive section and the policy statements including the positive comments on on-shore wind. But the phrases 'support' and 'actively support' 'encouraged' need to be clarified and quantified. Energy Alton has bemoaned the failure of developers to

include basic renewable energy on new houses such as solar PV only to be told that EHDC cannot refuse planning consent if it is not included. So, what does support actually mean? We argue that the plan should contain clear incentives in favour of renewable technology that developers understand from the outset and can build into their proposals. Leading authorities are doing just that by using CIL finance to encourage the development of district heating and other renewable energy options. We should do the same.

DM27.5 needs amending to include the energy value of the proposed development. If East Hampshire is to deliver a significant growth in locally generated energy there will be a trade off to consider. A small- scale development may not be worth it but the benefits to our energy strategy of a large capacity scheme may well outweigh the disadvantages.

In the plan district heating systems are mentioned once even though the Council's own Energy Strategy strongly endorsed such systems that use renewable energy, energy recovery and connections between domestic buildings and industry to lower carbon emissions. A system is being planned for Bordon- Whitehill but should be encouraged elsewhere especially in urban developments.

To date, delivery of community renewable energy projects in East Hampshire has been abysmal. So, we welcome DM27.4. But active support should be replaced by strong determination to invest in such schemes and expect communities to generate a minimum level of energy over the next ten years.

It is ironic that the act of flying - a major source of carbon emissions is to be protected. The plan states that renewable energy proposals will not be approved if they affect aviation facilities. This is absolutely the opposite of what should be the stated policy and is an example of disjointed thinking. Adaptation to climate change means that everyone has to do it including airports.

Resource Efficient Design

Policy DM28

The Policy objectives in DM28 are simply insufficient to meet the Authority's own strategy in relation to climate change. Design to Code for Sustainable Homes level four means that new homes built today will emit carbon emissions for the next 50 years.

We see the advantages of using HQM and BREEAM ratings because we recognise that energy efficiency is not just about design and build but also operation of the building by the owner/tenant. However, we would like to see the Authority go further than 'support'. There should be a presumption in favour of developments that deliver these standards from the outset. The Authority has the power to use its resources to incentivise developers to raise standards as set out in its own Energy Strategy and should use them.

Again, the paragraph relating to not meeting the required standards for technical or financial reasons should be heavily caveated leave developers in no doubt that it will a very rare occurrence.

Conclusion

- 1. The Plan fails to clearly express the present threat of climate change. It is a major challenge and should be clearly stated as such.**
- 2 This plan is in effect a plan for new house building. To properly tackle the impact of climate change we have to have full regard to all of the built environment and have policies to reduce carbon emissions from existing buildings. This must be made clear in the vision and objectives.**
- 3 This plan is far too passive in tone. There are too many expressions of support for low carbon solutions – expecting that developers will be helpful by implementing many of the aspirations on their own. This is very unlikely especially in these uncertain and economically stressed times. The plan must include LA generated incentives to deliver building standards that are necessary.**
- 4 We challenge the Authority to follow up its first Energy Strategy with the new aim to become carbon neutral by 2030 – a commitment already made by Bristol, Milton Keynes and Nottingham.**

Energy Alton March 2019