

Matters and Issues 10

Environmental Issues

5. Do policies ME4 and ME5 set local requirements in a way which is consistent with paragraph 95 of the NPPF?

Policy ME4 is weak and does not take sufficient account of the detailed sub-categories identified in the nine categories of sustainable design identified in the Code for Sustainable Homes – Technical Guide – November 2012, viz;

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|--------------------------------------|--|
| Energy and CO ₂ Emissions | Dwelling emission rate Fabric energy efficiency Energy display devices Drying space Energy labelled white goods External lighting Low and zero carbon technologies Cycle storage Home office |
| Water | Indoor water use External water use |
| Materials | Environmental impact of materials Responsible sourcing of materials – basic building elements Responsible sourcing of materials – finishing elements |
| Surface Water Run-off | Management of surface water run-off from developments Flood risk |
| Waste | Storage of non-recyclable waste and recyclable household waste Construction site waste management Composting |
| Pollution | Global warming potential (GWP) of insulants NOx emissions |
| Health and Well-being | Daylighting Sound insulation Private space Lifetime Homes |
| Management | Home user guide Considerate Constructors Scheme Construction site impacts Security |
| Ecology | Ecological value of site Ecological enhancement Protection of ecological features Change in ecological value of site Building footprint |

Each of these elements needs to be brought into focus within the policy and a system of Design Stage and Post Construction Stage certification implemented with appropriate targets set by the Council, dependant on the scope and scale of each development. All homes in new neighbourhoods should be targeted to at least Level 5 Sustainability.

As Policy ME4 in its present form is weak I contend that it fails to reflect paragraph 95 of the NPPF and is therefore unsound, ill prepared and not consistent with National Policy.

The Plan can only be made sound by reflecting the full requirements of the Governments Zero Carbon Buildings Policy and adopting the Code for Sustainable Homes. Each proposed Development should be identified with a targeted Level of Sustainability for each home and for the whole estate on which they will be built.

Policy ME5

Objective 3 (page 23) promises so much in adapting to the challenges of climate change but its target of 10% energy reduction will not provide the energy savings that we have signed up to as a Nation in the Kyoto Protocol. DEFRA in measuring our progress towards the UK's agreed Kyoto targets identifies in their Sustainability Development Indicators for July 2013 a 3% increase in Greenhouse Gases from 2011 to 2012 and a 4% increase in Carbon Dioxide Emissions in the same period.

Without more prescriptive measures and targets on new developments we will not achieve reductions in Greenhouse Gas or CO₂ emissions to the levels required.

The “**Relevant Evidence**” (paragraph 13.72 on page 167) inaccurately quotes the National Targets. These now require a 50% reduction by 2027; this was set in law in June 2011, other targets that were set in law in May 2009 are; a 35% reduction by 2022 and a 29% reduction by 2017, from baseline levels of 1990. All of these targets come into effect during the 15 year period of the Core Strategy.

In addition the “**Key Facts**” statement (page 167) erroneously identifies that the energy consumption in East Dorset and Christchurch was from renewable sources. In fact this was from gas, petroleum, electricity, coal and other manufactured fuels. (see CD4.2 Page 4 paragraph 2.7)

A target of 10% reduction on energy consumption relative to an increase in population of 15% means in fact a **net gain in energy consumption of 13.5%** equating to 285GWh. Alas there are no targets set for CO₂ emission reduction which means that East Dorset will push 88,700 more tonnes of CO₂ annually into the atmosphere.

Clearly if the Climate Change Act of 2008 and its amendments are to be achieved, something more drastic than a flexible approach (paragraph 13.23 page 168) to policies ME5 and ME8 needs to be undertaken.

In view of the above observations I contend that EDDC do not have much of an idea how they are going to manage a reduction in energy consumption to counter the additional CO₂ emissions and additional energy that new development will bring. For example why have the Council;

- not allocated any sites for Solar Farms or alternate renewable sources?
- not allocated further heath land to extract carbon dioxide from the atmosphere?
- not mandated that larger developments and new neighbourhoods will provision for and provide the infrastructure for district heating and power facilities?
- not already set targets for sustainable energy generation on each site allocation?

All of these elements are key to achieving National targets and mitigating the effects of climate change. Policy ME5 is so loosely worded that developers will have no trouble in finding reasons why their investigations cannot achieve the Councils remarkably low expectations.

I contend that Policy ME5 is not sound, has not been positively prepared, is not justified, and is neither effective nor consistent with NPPF paragraphs 95 and 97 or in supporting nationally recognized targets.