



# Bracknell Forest Borough Local Development Framework

**Core Strategy Examination**

**Topic Paper TP04**

**Environment**

**April 2007**

**Topic Paper 4**  
**Title: Environment**

**1. Introduction**

1.1 This Topic Paper is one of eight produced by Bracknell Forest Borough Council to assist the Public Examination into the Core Strategy, which will commence on 25<sup>th</sup> June 2007.

1.2 This Environment Topic Paper covers the following policies of the Core Strategy:

*CS10 - Sustainable Resources*

*CS11 - Renewable Energy Generation*

*CS12 - Renewable Energy*

*CS13 - Sustainable Waste Management*

1.3 The Council is preparing the following for Examination:

- **The Council's Self Assessment Statement**

This is available on the Council's website at [www.bracknell-forest.gov.uk/ldf](http://www.bracknell-forest.gov.uk/ldf)

- **The Topic Papers**

These cover procedural and conformity matters, the main Core Strategy themes and the Thames Basin Heath Special Protection Area. These will be available on the Council's website and in the Examination Library.

- **Written Statements responding to the Matters and Issues for Examination**

These will provide a detailed response to the separate Matters and Issues which will be identified by the Inspector as the basis for the debate at the Examination (and responding to specific points raised by representations to the submitted Core Strategy). These Statements will rely as far as possible on cross-referencing to the other documents listed above. These Statements will be available on the Council's website by the 24<sup>th</sup> May 2007.

- **Statements of Common Ground**

These will provide an agreed statement between the Council and specific representors on their representations. These Statements will be available on the website by the 24<sup>th</sup> May 2007.

1.4 Each Topic Paper is structured to provide:

- A broad summary of the submission representations and the changes sought;
- The broad basis of the Council's case in relation to the representations on this topic including the approach taken by the Borough Council, its conformity with national and regional guidance, and the evidence on which that approach is based.

1.5 Document references in ***bold italics*** relate to documents held within the Public Examination Core Document Library. In general, evidence is based on the following sources:

- Specific studies prepared to address issues to be covered in the LDF;
- Comments received from consultation responses;
- Information and guidance provided by the Sustainability Appraisal; and,
- Existing national, regional and local policies and strategies such as national planning policy statements or the Sustainable Community Plan.

1.6 Procedural and Conformity Matters relating to the Core Strategy are dealt with in a separate Topic Paper 'Topic Paper 1 – Procedural and Conformity Matters' (***TP01***).

## **2. Background**

2.1 Policies within the 'Environment' theme aim to broadly address the issues of climate change and sustainable resource use, which are fundamental to achieving the Core Strategy Vision for sustainable growth in the Borough. The policies within the Environment theme can have a positive impact both on the fabric of the built environment and, where possible, can enable behavioural changes by providing appropriate infrastructure and facilities to achieve a more sustainable lifestyle.

2.2 Policies CS10, CS11, CS12 and CS13 directly deliver the **Sustainable Community Plan (LD009)** Priority 2: Protecting and enhancing the environment. Most specifically there are direct links with 2(a) Reduce waste and pollution and 2(f) Increase energy efficiency and use of renewable energy. There are also indirect links with Priority 3: Improving health and well-being, as health improvements could arise from improving air quality, encouraging use of sustainable transport such as walking and cycling and reducing fuel poverty.

2.3 Policies within this theme link specifically to Core Strategy Spatial Objective K: To promote the sustainable use and disposal of resources and Spatial Objective L: To mitigate against and adapt to climate change. There are also links with Policy CS1. This policy underpins the whole Core Strategy and provides a fundamental set of criteria that will be applied to all development proposals to ensure that they take account of the Borough's economic, social and environmental needs.

## **3. Summary of Key Issues raised at Submission**

A summary of the broad issues raised at Submission is set out below:

- There is support for Policy CS10 and the requirement for Sustainability Statements and general, qualified support for CS11;
- Standards over and above Building Regulations should not be required;
- Viability issues must be considered in relation to site specifics to ensure that developments can be delivered to meet needs. The policies should therefore be more flexible without a threshold value and consider feasibility subject to site constraints;

- The scale and nature of a Sustainability Statement should be proportional to the development size;
- There is support for Policy CS12 but it is felt that targets should be flexible to require all new development to aim to be carbon neutral as circumstances change;
- There is insufficient evidence to require 20%, only just able to provide 10%;
- The targets are unduly onerous and go beyond requirements in the SE Plan;
- More emphasis should be placed on carbon reduction through other means, i.e. sustainable construction;
- There is qualified support for Policy CS13 so long as the issue of affordability is included;
- Policy CS13 duplicates the Berkshire Unitary Authorities Joint Minerals and Waste Local Development Framework [www.berks-jsu.gov.uk](http://www.berks-jsu.gov.uk) and contains general statements which cannot be measured; and,
- Objections to the omission of a separate policy on biodiversity.

#### 4. Context

- 4.1 The policies covered by this Theme are influenced by, and have had due regard to, national legislation, national policy statements and guidance, and regional policy. It is not the intention to provide a detailed justification of each; however, the following paragraphs identify the key elements which are considered relevant to the Environment theme policies covered in this Topic Paper.

##### National Context

- 4.2 The **UK Sustainable Development Strategy** (2005) places sustainable development at the heart of the land use planning system and at the core of new planning guidance. Two of the four priorities within this strategy are climate change and natural resource protection.
- 4.3 The White Paper, '**Our Energy Future: Creating a Low Carbon Economy**' (2003) sets out energy policy to cut the UK's climate change emissions through reducing energy consumed (CS10) together with a substantial increase in renewable energy (CS11 and CS12). The White Paper set out the Government's aspiration to generate 20% of UK electricity from renewable energy sources by 2020, and suggests that still more renewable energy will be needed beyond that date. This is further to the existing Government target to generate 10% of UK electricity from renewable energy sources by 2010. Policy CS12 in particular supports these targets.
- 4.4 **PPS1 (Delivering Sustainable Development) (ND007)** stresses the efficient use of resources and that local planning authorities should ensure that Development Plans contribute to global sustainability by addressing the causes and potential impacts of climate change. This should be through policies which reduce energy use and reduce emissions (CS12), promote the development of renewable energy resources (CS11 and CS12), and take climate change impacts into account in the location and design of development (CS10).
- 4.5 Within the Core Strategy, Policy CS10 aims for a reduction in carbon emissions through energy conservation measures to reduce energy demand.

Further carbon reductions arise from Policy CS12 which requires a proportion of the remaining energy budget be produced from on-site renewable energy. This approach therefore encourages energy conservation as priority. In addition, PPS1 states that Development Plan policies should take account of environmental issues such as: the management of waste in ways that protect the environment and human health, including producing less waste and using it as a resource wherever possible (CS13).

- 4.6 Since the publication of the Submission Core Strategy, a consultation draft on a **Supplement to PPS1** has been published, relating specifically to Planning and Climate Change. A paper has been produced to indicate conformity of the Core Strategy with this emerging guidance (**OD008**).
- 4.7 The Council considers that Policy CS13 has duly considered the requirements in **PPS10 (Planning for Sustainable Waste Management) (ND011)**. The policy helps deliver sustainable development through driving waste management up the waste hierarchy. In addition, Policy CS10 will ensure the design and layout of new development supports sustainable waste management.
- 4.8 **PPS22 (Renewable energy) (ND012)** states that local planning authorities should set out the criteria that will be applied in assessing applications for planning permission for renewable energy projects. Policy CS11 and CS12 set the strategic framework for this and they will also be supported by a more detailed Supplementary Planning Document. Furthermore, PPS22 says that Local Development Documents may include policies that require a percentage of the energy in new residential, commercial or industrial developments to come from on-site renewable energy developments; Policy CS12 sets in place such targets.
- 4.9 Policy CS10 has had regard to **PPS23 (Pollution Control) (ND013)** by limiting, and where possible reducing, greenhouse gas emissions through improved energy efficiency, minimising the emission of pollutants including light, air, noise, soil and water and making suitable provision for the drainage of surface water through sustainable urban drainage systems (SUDS). The Sustainability Statement required by Policy CS10 should demonstrate an assessment of the above issues.
- 4.10 Policy CS10 has had regard to **PPS25 (Development and Flood Risk) (ND014)** by aiming to reduce flood risk to and from new development through location, layout and design. SUDS should be considered within the Sustainability Statement and incorporated if necessary.

### **Regional Context**

- 4.11 Full account has also been taken of the existing Regional Spatial Strategy and the evolving **South East Plan (RD001)** in relation to the level of detail appropriate in the Core Strategy, by supporting the Plan's Vision of improving quality of life by the prudent use of natural resources.
- 4.12 Specifically, South East Plan *Policy W2* requires development design, construction and demolition which minimises waste production and associated impacts; Policies CS10 and CS13 are consistent with this.

- 4.13 Policy CS10 has also taken full account of South East Plan *Policy NRM1: Sustainable water resources, groundwater and river water quality management*, and *Policy NRM3: Sustainable flood risk management*. The Sustainability Statement will address these issues raised within the RSS. CS10 has considered SE Plan *Policy NRM4: Conservation and improvement of biodiversity* by requiring the Sustainability Statement to demonstrate how a development proposal will protect and enhance natural features including wildlife.
- 4.14 CS10 is consistent with South East Plan *Policy EN1: Development Design for Energy Efficiency and Renewable Energy* by encouraging the incorporation of high standards of energy efficiency in all development to be achieved through design, layout and orientation. The Sustainability Statement required by CS10 will encourage developments to demonstrate how these issues have been addressed. Furthermore, Policy EN1 encourages an assessment of a development's energy demand and sets a target of at least 10% of the energy demand to be from renewable sources for housing schemes of over 5 dwellings and commercial schemes of over 1,000m<sup>2</sup>. Policy CS12 is consistent by requiring at least 10% for all development, with larger developments required to provide 20% unless this is not viable (paragraph 131).
- 4.15 Policy CS11 is consistent with SE Plan *Policy EN5: Location of Renewable Energy Generation* by encouraging the development of renewable energy, subject to locational considerations, in order to achieve the regional and sub-regional targets for the production of renewable energy as set out in SE Plan *Policies EN3 and EN4*. Both CS11 and CS12 support in principle the development of renewable energy, therefore are consistent with SE Plan *Policy EN6: Development Criteria*.

## 5. Council Approach

- 5.1 The approach towards producing policies, which protect and enhance the environment, and achieve a sustainable use of resources, has been informed by:
- Consultation during the preparation process;
  - Other plans and strategies;
  - Sustainability Appraisal; and,
  - Background Studies.

### Issues and Options

- 5.2 At **Issues and Options** stage question 30 of the 'Your Views' questionnaire related to whether the Borough Council should require developers to incorporate alternative energy sources into their development; 82% of respondents agreed with this statement (45% 'strongly agreed'). Question 31 asked if the Borough Council should require developers to ensure the sustainable use of natural resources in new development; 87% of respondents agreed with this statement (46% 'strongly agreed'). In addition, 89% of respondents agreed (54% 'strongly agreed') that the Council should promote policies which mitigate against the effects of climate change (question 32) and 90% of respondents agreed (53% 'strongly agreed') that

the Council should promote policies which adapt to the effects of climate change (question 33).

- 5.3 Further, question 13 sought views on which topics were the five most important to quality of life; 13% of respondents cited that the issue of reducing rubbish and pollution was the most important.
- 5.4 Therefore, it was clear at this early stage that a policy approach addressing sustainable resource use, renewable energy and waste management was necessary and supported by the consultation responses.

### **Preferred Options**

- 5.5 As a result of these responses, policies relating to Sustainable Resources were drafted and consulted upon during the **Preferred Options** Regulation 26 stage. These comprised Policy E2 - Sustainable Resources, Policy E5 - Renewable Energy and Policy E6 - Sustainable Waste Management. In total, these three policies raised 15 comments, 13 supports and 6 objections.
- 5.6 An appraisal of the sustainability of the emerging Core Strategy policy approaches was set out in the Draft Sustainability Appraisal Report, which informed the Preferred Options policy approaches. This Draft Sustainability Appraisal identified that negative environmental impacts may arise from some policies (i.e. relating to housing provision). Policies CS10 (previously E2) and Policy CS12 (previously E5) were proposed as mitigation measures to reduce any potential significant adverse effects identified.
- 5.7 The Sustainability Appraisal process also proposed changes to the wording of the policy approaches which were subsequently published for consultation. These changes included: reference to locally produced products, requiring renewable energy generation which does not adversely impact on the natural or historic environment, addressing CO<sub>2</sub> emissions instead of energy demand, and promoting waste minimisation as a priority.

### **Submission**

- 5.8 A summary of the issues raised at the Preferred Options consultation and the Council's response can be found in the **Statement of Compliance (LD004)**. Several comments were received some objecting, some supporting different elements of the strategy and the policies within this Topic Paper.
- 5.9 These responses and the findings from the **Final Sustainability Appraisal Report (BP001)** informed the Submission Policies which included:
- Policy CS10 which ensures the efficient and sustainable use of all resources in development and requires developers to submit a Sustainability Statement demonstrating best practice in the sustainable use of resources in developments. The threshold value within the Preferred Options policy was removed as a result of consultation responses;
  - A new Policy CS11 concerning development for the generation of energy from renewable resources. This policy builds on guidance set out in the 2003 Energy White Paper and PPS22 which promote a general presumption in support of renewable energy schemes;

- Policy CS12 which considers proposals for renewable energy provision in development and requires development proposals to be accompanied by an energy demand assessment demonstrating how CO<sub>2</sub> emissions will be reduced by at least 10%; and,
- Policy CS13 which considers proposals for management and treatment of waste be in accordance with the Berkshire Unitary Authorities Joint Minerals and Waste Local development Framework [www.berks-jsu.gov.uk](http://www.berks-jsu.gov.uk) .

### **Implementation and Monitoring**

- 5.10 A key element of the new planning system is to ensure that policies are implemented and monitored. One of the elements for the implementation of policies in this paper, in addition to the determination through planning applications and appeals, will be through the preparation of further local development documents and supplementary planning documents. In particular, the Council has identified in its latest Local Development Scheme (***LD007 & LD008 awaiting approval***) a Development Management - Environment, Recreation and Transport Policies & Sites Development Plan Document, due to commence in January 2010 and a Sustainable Resource Management Supplementary Planning Document, which has already commenced.
- 5.11 The approach to monitoring policies is set out in Appendix 5 of the Core Strategy and specific targets and indicators are linked to a number of policies and objectives. At this strategic level, the Council has used the National Core Indicators which establish an overall monitoring framework.

## **6. Conclusions**

- 6.1 The Council considers that the policies and their contribution to the overall Core Strategy are **sound** as they:
- Reflect national legislation and guidance on spatial planning set out in national planning policy (i.e. PPS22) and is in conformity with the emerging South East Plan (Test 4);
  - Identifies an approach which is consistent with the approaches and plans of adjoining authorities (Test 6);
  - Is supported by appropriate and robust evidence (Test 7);
  - Includes flexibility within the overall strategy (Test 9).
- 6.2 Therefore, the Council feels this approach is sound and consistent with the emerging South East Plan, the Core Strategy Vision and national planning policy guidance. As a result, the Council believes no changes are necessary to make the plan sound. Minor factual changes may be put to the Inspector for her consideration for purposes of clarity. Where relevant these will be identified within the Written Statements and/or Statements of Common Ground.