Tunbridge Wells Borough Council

2019 Energy Policy Position Statement

July 2019

Current Position

In 2007, Tunbridge Wells Borough Council Adopted a Renewable Energy SPD in 2007 which requires developers to meet the following carbon reduction target:

> Having regard to previous policy *, the Borough Council will expect all development (either new build or conversion) with ten or more residential units/over 0.5ha site area, or for non-residential developments with a floor space of 1,000sqm or over 1.0ha site area, to incorporate renewable energy technology on-site to reduce predicted CO2 emissions by least 10%.
>
> NB. National targets of energy obtained from renewable sources are to increase to 15% by 2015 and 20% by 2020.
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> * The Borough Council has a number of strategies, which variously set out the key objective of safeguarding the environment. They include Strategic Objective 2 of the Tunbridge Wells Borough Local Plan 2006: To conserve finite non-renewable resources such as…energy. In addition, Core Policy 5 of the Core Strategy 2010: Have regard to, and implement, South East Plan renewable energy and energy efficiency targets, as well as wider carbon reduction targets. In more recent years, this has been taken to includes the provisions of the Climate Change Act 2008 to which the Borough Council is legally bound.

Since this time, government energy policy has been through a number of changes under various governments. However, the ability of local authorities to require carbon reductions to be reduced by a set percentage using renewable energy generating technology (commonly known as a 'Merton Rule' after the first council that implemented the requirement) has not changed, and remains a provision under the Planning and Energy Act 2008.

Emerging Local Plan

Implementing a more ambitious approach to talking climate change has been a key objective during the development of the new Draft Local Plan. As such the following new policies have been drafted:

Table 1: Non-residential development

Carbon Reduction Approach	Target Range	Application	Note
Improvement in Predicted Carbon Emissions** aka Fabric First approach	10-15 %	All development	Cost variations dependent on the building type and use. For example, more substantial energy savings would be possible for buildings with office and retail uses compared with buildings used as schools and hotels.

Carbon Reduction Approach	Target Range	Application	Note
LZC Technology	15- 20 %	All major development	Usually achieved via the introduction of additional PV or air source heat pumps.
Combined Approach	25- 35 %		

** Against requirements in Building Regulations Part L 2013.

Table 2: Residential development

Carbon Reduction Approach	Target Range	Application	Note
Improvement in Predicted Carbon Emissions	10 – 19 %	All development	Variation is introduced by building form with energy savings being more challenging for mid floor flats and mid terraces than detached or semi-detached dwellings. In addition, the use of Mechanical Ventilation Heat Recovery technology was critical in order to obtain the higher energy savings. In traditional, naturally ventilated homes currently used in construction, 10% energy savings were possible for all dwelling types.
LZC Technology	15 – 20 %	All major*** development	Usually achieved via the introduction of additional PV or air source heat pumps.
Combined Approach	25 – 39 %		

*** Major development all residential developments greater than 10 dwellings (or 0.5 ha and greater if outline) and all non- residential developments greater than 1 ha.

The Draft Local Plan (including new policy wording above) has undergone Regulation 18 consultation. The Council is currently considering the representations made on the Draft Local Plan, including potentially on these policies. It is expected that the Local Plan will be submitted for examination in 2020. Thus, the aforementioned 'current position' is the only one which has been formally adopted by the Council.

However, the Council recognises that many developers will wish to provide more ambitious strategies in line with or exceeding the borough's newly drafted policy expectations within Tables 1 and 2.

The reasons for this are varied and could include a corporate approach in which the developer is reacting to the 'climate emergency', or a planning balance approach in which an applicant is seeking to demonstrate the acceptability of a proposal by going above and beyond existing policy requirements.

In all cases, the Council strongly encourages this more ambitious approach.

Future Approach

The Council recognises that national energy policy is likely to be going through a further period of change over the next year including potential uplifts to Parts F (ventilation) and L (energy) of Building Regulations in order to transition towards a new Future Homes Standard which will be introduced before 2025.

Government approach will be monitoring carefully over the upcoming months and an updated to this position statement will be issued if necessary.