

North West Bicester

Proof of Evidence Carbon Emission Reduction Summary

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1 Summary Statement

1.1 Introduction

1.1.1 My name is Jonathan Riggall. I hold a BSc (Hons) Degree in Environmental Archaeology from Edinburgh University (2000) and a Masters Degree from Middlesex University in Integrated Pollution Control (2003).

1.1.2 I am both a fellow of Royal Geographic Society, where I am a registered Chartered Geographer, and a member of the Institute of Environmental Science, and registered Chartered Environmentalist. I have worked for over 20 years in environmental consultancy and 15 years across planning energy and zero carbon strategy for community development projects across the UK.

1.1.3 This proof of evidence summary should be read alongside the full proof of evidence for carbon emission reduction, document APP/2/A, for the Appeal Reference: APP/C3105/W/23/3315849.

1.1.4 My Proof of Evidence considers Cherwell District Council's ("CDC") (CD 9.2) putative Refusal for Refusal 1 (set out below) of Firethorn Developments Ltd's outline planning application for 530 homes at North West Bicester (the "Application"), based on it conflicting with their Local Plan (CD 4.1) policies, namely Policy Bicester 1 and Policies ESD 1 to 5.

Putative Reason for Refusal 1 (RfR1)

The development, when set against the viability of the scheme, would not go far enough in trying to achieve the True Zero Carbon requirements for NW Bicester, as set out by Policy Bicester 1 of the Cherwell Local Plan Part 1 2011-2031. This would undermine the Council's strategy for achieving an Exemplary Eco Town development at NW Bicester which sets this site apart from others and where the Council has declared a Climate Emergency. The development would therefore conflict with Policy Bicester 1 and Policies ESD 1 to 5 of the Cherwell Local Plan Part 1 2011-2031 and the North West Bicester SPD 2016.

Note to Appellant: This reason for refusal is capable of being addressed

1.1.5 I also consider the North West Bicester Alliance, who are Rule 6 Party in this appeal, Statement of Case (CD 9.3). Within their written statement there are three key aspects related to carbon emission reductions:

Section 1.3 (d), page 2: We all want to ensure that the UK's National Ecotown Exemplar – NW Bicester Ecotown – continues in the direction of the national and local Climate Change Zero Carbon targets. This can only be achieved by Rejecting the Application as it currently stands. If key components of the Masterplan are treated as dispensable in the present Application, then all UK developers will be incentivised to take the same approaches: this will leave the UK with no chance of reaching anywhere near its Climate Change Targets, and we will no longer be able to call the NW Bicester development an "Ecotown".

Section 2.15, page 4: A further key reason why the Appellant's Application should be refused, as it presently stands, also relates to these other Applications. Both have originally stated they will meet Policy Bicester 1 via True Zero Carbon per home and 30% Affordability, which the Appellant's Application does not; and that they will meet

numerous other national and local planning policies, which the Appellant's Application does not meet. (We note that while the Appellant discusses meeting Future Homes Standard 2025, this is a much lower level than the now-rescinded Code for Sustainable Homes Level 5 – the standard required by Policy Bicester 1 and the NW Bicester SPD. We note also that Future Homes Standard 2025 is a draft that is not stabilised and is not expected to be finalised before 2025, possibly even later, whereas Level 5 is an existing recognised standard that can be used legally as a reference.)

3.12 Page 7: The Applicant has (again) refused to link up with the Ecotown's existing District Heating System. We will show that, while it may be easier for the builder not to link the two, it will reduce the potential for future upgrades to continue to keep the Ecotown at True Zero Carbon level, and improve it if it becomes possible to do so.

- 1.1.6 An Outline Energy Statement, dated March 2021, (CD 1.18) was submitted with the Application addressing CDC Local Plan policy requirements and placing a timeframe for each policy to be adhered to through to detailed planning.

1.2 Policy Requirements

- 1.2.1 Policy Bicester 1 (Page 140 of the Local Plan, CD 4.1) defines the requirement for the 6,000 homes of the North-West Bicester application to be zero carbon whereby:

"The definition of zero carbon in eco-towns is that over a year the net carbon dioxide emissions from all energy use within the buildings on the eco-town development as a whole are zero or below."

- 1.2.2 It was confirmed by the planning inspector for the Appeal Decision: Land off Howes Lane and Middleton Stoney Road, Bicester (App/C3105/W/16/3163551) (CD 7.1) that Policy Bicester 1 relates to the wider Ecotown development 'as a whole' to infer that it is not necessary for every individual development within the eco-town to be zero carbon so long as deficiencies on one site are made up by better performance on another site.

- 1.2.3 The inspector in that appeal reconfirmed that this interpretation is confirmed by footnote 6 of the PPS1 eco-towns supplement; *"This definition of zero carbon applies solely in the context of eco-towns and applies to the whole development rather than to individual buildings."*

- 1.2.4 Policy ESD2 Energy Hierarchy and Allowable Solutions (CD 4.1) defines the options for minimising carbon emissions to zero including:

1. Reducing energy use, in particular by the use of sustainable design and construction measures.
2. Supplying energy efficiently and giving priority to decentralised energy supply (aligned to Policy ESD 4).
3. Making use of renewable energy.
4. Making use of allowable solutions (offsets).

- 1.2.5 Policy ESD 4 sets out the requirement for undertaking a feasibility assessment for the potential to connect to develop biomass combined heat and power energy centres with district heat networks. The policy notes that connection

to a heat network should be prioritised unless an alternative solution would deliver the same or increased benefit.

- 1.2.6 Supporting these policies is the Supplementary Planning Document (SPD) North West Bicester (CD 4.5). The SPD defines (paragraph 4.15, page 17) the approach to energy and carbon dioxide reduction to meet true zero carbon as set out in the Masterplan Energy Strategy (CD 8.3.1) and summarised below as:
1. A large scale solar array on all roofs;
 2. Energy efficient buildings; and
 3. A network of energy centres providing gas and biomass combined heat and power (CHP) which will require a district heating network, subject to a separate feasibility study being undertaken by CDC.
- 1.2.7 Page 4, paragraph 1.8, 5th bullet point of the SPD states the requirements of the SPD should be met at the detailed planning application stage and beyond to ensure adequate and consistent approaches to quality and delivery.
- 1.2.8 This aligns to Ecotown Principle ET 9.2 (Appendix 2 paragraph ET9.2 Page 64 of the SPD, CD 4.5) which notes the need for options to ensure resilience in planning towards detailed applications.

1.3 Commitments made as part of the Application

- 1.3.1 Section 3.6 Page 11 and Paragraph 9.2.8 Page 26 of the Outline Energy Statement (CD 1.18) confirms the proposed development will meet all relevant policy requirements of Local Plan Bicester Policy 1 True Zero Carbon.
- 1.3.2 This will be achieved through:
1. Installation of site wide roof mounted solar panels
 2. Establishing fabric energy efficiency measures meeting the SPD evidence base requirements of Code for Sustainable Homes Level 5/6 targets fabric standards.
 3. Installation of low carbon heating technology such as air source heat pumps and using smart energy technologies such as energy storage and heat recovery, offering increased benefits to emission reductions over the existing heat network.
- 1.3.3 In line with the requirements of Policy ESD4 the feasibility of connecting to the existing Bicester District Heat Network was presented in the Outline Energy Statement.
- 1.3.4 At the time of the outline application Scottish and Southern Energy Enterprise (SSE Enterprise) noted there were no plans to introduce biomass combined heat and power which was the only option available to meet zero carbon standards on site, as defined in the Masterplan Energy Strategy (CD 8.3.1)

evidence which informed the definitions of true net zero carbon policies and North West Bicester SPD (CD 4.5).

- 1.3.5 Section 4 Paragraph 4.1.3 Page 12 of the Outline Energy Statement (CD 1.18) notes connection to the existing heat network may impact the development achieving Building Regulations as it currently runs off natural gas which is likely to have higher carbon emissions than alternatives such as electric lead heating technologies.
- 1.3.6 Section 4 Paragraph 4.1.4 Page 12 of the Outline Energy Statement (CD 1.18) notes continual engagement with SSE Enterprise on opportunities to connect to the district heat network, prior to reserved matters application. This will allow for any potential amendments to future Building Regulation calculation methodologies to be incorporated into detail design considerations.

1.4 Response to Putative Reason for Refusal 1 (RfR1)

- 1.4.1 Regulation and technology for decarbonising new housing development continues to evolve. The costs associated with implementation of design and technology to decarbonise development continue to change significantly year on year.
- 1.4.2 As part of the Application, a suite of approaches, aligned to the energy hierarchy defined with CDC Local Plan Policy ESD2, were appraised to meet the definition of True Zero Carbon defined in Local Plan Policy Bicester 1 and the North West Bicester SPD.
- 1.4.3 Rather than being prescriptive at the outline stage it is expected that each reserved matters application (“RMA”) would consider the most appropriate design approach and technology implementation available at the time and such measures would then be approved and conditioned by CDC as part of each RMA.
- 1.4.4 In keeping with all other applications associated with the Ecotown, it is expected that a planning condition would be set to monitor how the project will deliver planning policy obligations on carbon emission reduction.
- 1.4.5 The proposed development therefore aligns to meeting the definition of True Zero Carbon defined in Policy Bicester 1 and the SPD through the use of the measures defined in Local Plan Policy ESD2.



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