

8. Policy and Planning Recommendations

The previous chapters have developed an evidence base for policy development, based on the policy, energy use and environmental context, the resource potential and delivery opportunities. The sections below outline the possible policy options for Swale Borough Council to implement carbon reductions, support sustainable design and build resilience to climate change. The policy options are based on the analysis within this report and the best information available at the time of writing. These policies should be developed in conjunction with the other policies that make up the Local Development Framework and other Council policies and strategies and consider the effect of policies on the local development context to ensure that they are fit for purpose, viable and achievable.

CEN have also produced a Climate Change Strategy, ***Sustainable Design and Construction Guidance Document***, which also provides guidance on similar sustainability topics and carbon targets. Where our policy recommendations are similar to CEN's guidance, we have included their insights. However, their document does have a specific focus on construction, their report is replete with construction material selection advice.

The Council should review the policy options discussed below and refine them as necessary when incorporating them into its Core Strategy. The structure of the chapter is similar the previous one, considering policies applicable to existing buildings, new development and strategic community-wide interventions. The policy options do not propose exact policy wording, as the Council should review and develop this.

The figure below outlines the relationship with the three tiers of opportunity for energy efficiency through existing, new, and strategic community-wide interventions, providing a list of policy options that could be provided in relation to these opportunities.



Figure 67: Policy Options for the three energy opportunities

The Energy Opportunities Map and delivery opportunities and mechanisms outlined in the previous chapter have informed the policy proposals in this chapter. We suggest that the three elements be treated together as follows:

- The EOM is either adopted as policy and used to justify planning and other policies and actions, or included in a Supplementary Planning Document (SPD); and
- The recommendations form the basis of council-wide discussions on delivery.

With respect to the first point, we do believe a Sustainable Design SPD would provide those making planning applications more information on appropriate measures they can take to reduce energy use, reduce water use, support wider environmental and social aims and adapt to climate change.

The proposed policy options will need to be reviewed if and when the LPA and their partners agree to the approach to local authority delivery. The review will need to consider:

- The nature of the local authority delivery mechanism and the role of planning policy in supporting this; and
- The extent to which existence of this mechanism influences the viability and feasibility of the policies set, and discussion around the need for more explicit criteria.

8.1 EXISTING DEVELOPMENT

The scope of planning policies to directly influence existing development is fairly limited. For this reason, it is important that delivery opportunities identified in Chapter 7 are developed further in order to improve the energy performance and resilience of the existing building stock.

In Swale, the existing stock – particularly existing commercial and industrial buildings – makes up a significant portion of energy demand (and thus energy related carbon emissions) over the Core Strategy period. This means working to retrofit and improve existing stock is a priority. Section 3 gives an overview of current stock and possible improvement scenarios for the future.

8.1.1 POLICY OPTIONS: CONSEQUENTIAL IMPROVEMENTS TO EXISTING HOMES

Policy Options Development Context

The purpose of these recommendations is to reduce CO₂ emissions from existing buildings, including both residential housing and industrial and commercial buildings, thereby creating more resilient existing buildings. The approach aims to make the most of any easily attainable opportunities for improvements to existing buildings. These might include loft and cavity wall insulation, draught proofing, flood prevention, natural cooling, improved heating controls and replacement boilers.

When owners submit an application for an extension to their building represents an opportune time to encourage owners to also consider improving the energy efficiency of their buildings. It is not, however, advisable to set blanket requirements to improve existing buildings when a planning application is triggered through a proposal for an extension. We recommend that policy mechanisms and planning processes are promoted and that information is available to building owners that outlines the possibilities and associated costs. Information could be outlined in an SPD or targeted brochure.

Precedent examples exist for these types of policies and supporting guidance for existing development within the Uttlesford Council Energy Efficiency and Renewable SPD (2007). This SPD includes details of policies relating to extensions and replacement dwellings. These precedent policies are listed below:

Uttlesford Guidance 2 - In relation to extensions, where a property is proposed to be extended the Council will expect cost effective energy efficiency measures to be carried out on the existing house. Applicants are asked to complete and submit a home energy assessment form and are notified of energy savings measures that the Council will require as part of the conditions of granting planning permission for the extension

Uttlesford Guidance 3 - In the case of replacement dwellings if the replacement is bigger than the existing house then the Council will seek an "as built" dwelling emission rate 10% lower than the target emissions rate calculated to comply with Part L1A of the Building Regulations

Uttlesford District Council has been successful in implementing these policies and over the past three years have been well received by households. While the results stemming from this policy have never been empirically verified, they have reportedly influenced approximately 1,400 extensions so far, and the total projected savings from measures required as a result are £72,600 and 398,000kg of CO₂ per year.

Because the majority of Swale's carbon emissions come from commercial and industrial buildings, guidance such as the Uttlesford's would need to be adapted to suit the specific needs of these sites.

For non-residential buildings the improvements are likely to focus on the specification of more efficient services rather than on building fabric changes as such changes are likely to yield minimal CO₂ reductions. On the other hand, careful specification of services within the building (e.g., lighting, ventilation) are significant and can generally outweigh savings achievable through low and zero carbon technologies.

The Council can also ensure that micro-generation is delivered throughout Swale, including conservation areas, by providing design guidance as to how technologies can be incorporated on difficult buildings/within sites in conservation areas. The guidance can demonstrate which technologies are most suitable for designated areas. Key community stakeholders have specifically mentioned the importance of clarifying planning guidance related to solar PV installations on roofs. The Council should investigate developing clear guidance and training officers on the topic.

Similar to energy efficiency in existing homes, water efficiency has been identified as a key issue for Swale Borough. If the Council is to provide encouragement and guidance to homeowners, this should also extend to water efficiency.

Planning Recommendation:

We recommend that the Council develop supporting guidance in an SPD, or targeted brochure, that encourage improvement of existing buildings (for both energy and water efficiency), and apply these where the planning process is triggered in extension or conversion applications. Currently, requiring improvements to existing homes through policy is seen to be in conflict with national planning policy and is yet to be tested. However, the Council, especially Development Management, can play an active role by working with building owners and developers to prompt the opportunity to retrofit carbon reduction and adaptation measures.

Specifically, the Council should investigate guidance which support the appropriate installation of solar photovoltaics on roofs within the Borough. This is particularly important for industrial buildings, which usually have large flat roofs making them ideal places to install solar panels.

The installation of micro-generation technologies in conservation areas should also be supported by guidance that shows how selection and placement of micro-generation technologies should be undertaken to ensure conservation priorities are not harmed.

8.2 NEW DEVELOPMENT

There are many different planning approaches that can be directed towards new development. The starting point has been to focus on policies that: the Council's Development Management team can easily implement and potential applicants can easily understand; do not have an adverse impact on the scheme's viability; and maximise CO₂ reduction and decentralised renewable and low carbon energy installations.

It is important that new buildings are designed with energy efficiency in mind, and include renewable energy, where feasible. When possible this should be included on-site, but off-site solutions could be considered provided benefits can be shown. For example, where a critical mass can be established for the needs of more than one development to be met. Often the most cost-effective options for carbon reduction are realised through considering the wider context of a development's relationship to its surrounding area. In these situations, it is likely in the interest of the developer, Council, and community to deliver wider opportunities.

While Swale Borough is still in the process of defining its planned level of growth, based on the recent pace of development, growth is likely to continue to occur relatively quickly. Swale Borough Council is still in the process of finalising its Core Strategy. However, with a large amount of commercial, retail, and housing stock expected to be planned for and built in over the Core Strategy period to 2031, there is an opportunity to influence where much of the new growth is located and to identify possible strategic sites where specific climate change policies should apply.

8.2.1 POLICY OPTIONS: ACHIEVING A REDUCTION IN CO₂ EMISSIONS THROUGH NEW DEVELOPMENT

Policy Options Development Context

There is a framework through national and regional policy for the inclusion in planning policy of CO₂ emissions targets and higher energy and carbon performance standards than those found in the Building Regulations. Changes to the Building Regulations for residential buildings, in 2010 and expected in 2013 and 2016, will bring in tighter standards for CO₂ emissions. From 2016 it will be necessary for all new residential buildings to be built to zero carbon standards, with the equivalent standard for non-residential buildings due to be introduced in 2019.

By applying carbon reductions beyond required Building Regulations, policy can be used to accelerate a move toward zero carbon developments. However, this is not recommended on a Borough-wide basis for a number of reasons, including:

- Carbon reduction policies that are too progressive are likely to be counterproductive, only working to encourage developers to look at neighbouring authorities with more lenient policies;
- The emerging PPS advises that additional targets should only be used in the interim before 2013 when increased Building Regulations come into place;
- The Core Strategy is unlikely to come into application for two years;
- The resource and training required to implement such a policy for such a short period of time is considered burdensome; and
- Viability testing should be applied to test local delivery of additional targets.

Considering the proposed changes to Building Regulations, policy development alone is seen as limited in effect, and planning will need to also consider location, type and phasing of new development. Using the Energy Opportunities Map and other analysis conducted in this report, low carbon opportunities should be a key criteria used to determine how the Borough will grow. This report has identified opportunities for decentralised energy systems and district heating networks in the Borough.

Precedent examples exist for these types of policies for new development within the draft Manchester City Council Core Strategy. The Core Strategy includes details of a policy relating to reducing CO₂ emissions through new development. This precedent policy is listed below;

Policy Approach En1 – Achieving a Reduction in CO₂ Emissions through New Development

The City Council will seek to decouple growth in the economy and growth in CO₂ emissions, through the following actions;

- *All development must follow the principle of the Energy Hierarchy*
- *Wherever possible new development must be located and designed in a manner that allows advantage to be taken of opportunities for decentralised, low and zero carbon energy.*

- *Where possible new development will be used as a mechanism to help improve energy efficiency and increase decentralised, low carbon energy supplies to existing buildings.*
- *Where appropriate new development will be required to connect to existing or planned/potential decentralised heat and/or power schemes.*

Planning Recommendation:

Through a spatial planning process, opportunities for growth and development should be prioritised where they are likely to drive low carbon solutions; by being in an opportunity area near a viable district heating network, where development sites are of a size to drive their own decentralised systems, or where clear opportunities exist to implement wind energy or support hydro developments.

Policy Option:

Efficient Design and Integration of New Development

All new development should, where possible, be located and designed in a way in which advantage can be taken of opportunities for decentralised, low and zero carbon energy.

All new development should catalyse improvements for energy efficiency and increase supplies of decentralised, low-carbon energy in existing buildings.

All new development should, where appropriate, be required to connect to existing or planned decentralised heat and/or power schemes.

Design, Layout and Location

Development proposals should respond to opportunities identified in the Energy Opportunities Map.

All new developments should ensure buildings are designed to be warmed by the sun, orientating buildings to maximise sunlight and daylight and using natural lighting and ventilation to reduce carbon emissions. This is similar to CEN's recommendations.

The Council should support the design or location of buildings to enable people to get access to amenities with fewer or shorter car journeys. In addition the council should support development which makes efficient use of land with good access to public transport to reduce travel and therefore carbon emissions.

Approach to Policy Implementation

Developments that have an opportunity to install or connect to decentralised energy should be identified using the Energy Opportunities Map (EOM) and the development typology analysis contained in the Addendum to this report. On larger sites, an energy strategy should be required outlining the ways in which development will achieve carbon reductions and investigation of a range of opportunities.

In encouraging energy efficient buildings that use the minimum amount of energy and meet the needs of the people using them. Wherever possible, the context of the site and its surroundings buildings should be taken into account to make sure the building is designed to take advantage of passive energy. This can be achieved in a number of ways, such as: ensuring principal rooms face

south to benefit from solar gain; buildings are laid out on the site to account for the wind direction; and tree and shrub planting are designed to act as windbreaks, which will ensure wind chill factor is reduced. These goals will help to ensure policy options can be met.

In addition, Swale Borough Council should consider the orientation of new residential developments to prioritise energy efficiency. For example, the use of the cul-de-sac in building design is inefficient as the heating circuit is incomplete. Arranging the location of buildings in block form allows heat to flow constantly around the system. Mixed use buildings also offer good opportunities for energy efficiency as a range of uses provides a variety of heat loads.

Policy implementation can also be achieved by considering how existing areas that are to be re-developed or enhanced can assist in meeting energy efficiency goals. The Queenborough and Rushenden masterplan has included a CHP plant, which might act as a catalyst for other CHP plants being adopted in the area.

8.2.2 POLICY OPTIONS: WIDER SUSTAINABLE CONSTRUCTION TARGETS FOR NEW DEVELOPMENT

Policy Options Development Context

The PPS1 Supplement allows local authorities to set sustainability standards where local circumstances warrant them. The Southeast will be affected by climate change, with frequent winter flooding, possible heat waves, changes in the landscape as well as changes in habitats and species composition, habitat fragmentation and changes in soils, recreation and tourism and cultural heritage. This means that actions must not only be taken to reduce the impacts of climate change by reducing CO₂ emissions, but also to adapt proposed development to the effects of climate change and other environmental damage. The Code for Sustainable Homes is the voluntary Government-backed building assessment tool that covers a full range of sustainability issues including, but not restricted to, energy and CO₂ emissions.

As the Code for Sustainable Homes requires mandatory credits for energy and water, these are the most inflexible areas within each Code level specified. Other areas of the Code are more flexible and account for site-specific conditions as to whether or not they can be achieved. This study has provided indicative costs of the application of various levels of the Code for Sustainable Homes and BREEAM. Chapter 5 and 6 also demonstrate the local need for new development to be built to high sustainability standards to protect the environment and support socio-economic systems.

As Chapter 5 demonstrates, Code Level 5 and 6 are unlikely to currently be viable in Swale Borough due to the additional cost associated with the water credits. While water is a key issue for the area, building to Code 3 and 4 still provides very high levels of water efficiency. Advice documents for the Thames Gateway recommend that higher Code targets than Code 4 are not sought in the area due to the relative cost-benefit of water savings that can be made in new developments when compared to wider initiatives. The proposed policy Code targets could be reviewed in response to any future changes in Code water criteria for Code Levels 5/6.

Based on known cost information discussed in Chapter 5, it is considered that BREEAM 'very good' is the highest standard suitable for application on a borough-wide scale. Strategic sites can aspire to higher standards where achievable.

Dover District Council has adopted Core Strategy policies that require delivery of district-wide Code and BREEAM levels. These policies are supported by a sustainable construction evidence base that shows that the Dover area is very resource constrained and is likely to be seriously affected by climate change. Dover District Council’s policies include a provision to fund off-site reductions in carbon or water use where targets cannot be met on-site. The Dover policies are as follows:

New residential development permitted after the adoption of the Strategy should meet Code for Sustainable Homes level 3 (or any future national equivalent), at least Code level 4 from 1 April 2013 and at least Code level 5 from 1 April 2016.

New non-residential development over 1,000 square metres gross floorspace permitted after adoption of the Strategy should meet BREEAM very good standard (or any future national equivalent).

Where it can be demonstrated that a development is unable to meet these standards, permission will only be granted if the applicant makes provision for compensatory energy and water savings elsewhere in the District.

Climate change needs particular attention in Swale, as much like many areas of the southeast, the Borough is prone to flooding, water scarcity and heat wave risks. A policy option has been included that requires new development applications to demonstrate how they have created resilient places and buildings. Flood resilience will be particularly important in current and future flood risk areas.

Precedent for climate change adaptation policies exists in the London Plan (as detailed in Chapter 6). The draft Manchester City Council Core Strategy includes a policy on climate change adaptation as follows (it includes a separate policy on managing flood risk):

‘All new development will be expected to be adaptable to climate change in terms of the design and layout of both buildings and associated external spaces. In achieving developments which are adaptable to climate change developers should have regard to the following, although this is not an exhaustive list:

- *Appropriate treatment of all surface areas to ensure rain water permeability*
- *Measures to reduce the urban heat island effect*
- *Increase in tree cover*
- *Building orientation to reduce solar heat gain*
- *Incorporation of green roofs where appropriate’*

The CEN report is rich in climate change adaptation recommendations, which are supported by this study:

With respect to ecology, it notes the importance of undertaking an ecological appraisal, which recommends protection, enhancement, and management of biodiversity on site, including in rivers and watercourses. The report also mentions importance of “taking account of the unavoidable climate change anticipated over the lifetime of the development.”

For green infrastructure, advice includes improving open and green space linkages; consideration of green/brown roofs, green walls, habitats, wildlife corridors, renaturalisation of rivers, inclusion of vegetated buffers; and prioritising increases in biodiversity.

Suggestions for rainwater harvesting specific to low density developments (floor-area ratio of 2 or less) should incorporate rainwater harvesting for flushing WCs and where practicable for supplying washing machines. In addition, for houses with external space, development proposals should show that water butts for the harvesting of rainwater for irrigation have been included.

Policy Options:

Sustainable Design and Construction

New residential developments (10 units or greater) in Swale are required to meet full 'Code for Sustainable Homes' standards or equivalent. These requirements will not come into effect until successive updates to Part L of the Building Regulations become mandatory:

Code level 3 or above, will be the current required for all new homes as part of Part L Building Regulations.

Code level 4 or above, will be required for all new homes once updates to Part L come into effect (currently scheduled for 2013).

All new non-residential developments in Swale over 1000m² gross floor area should aim to achieve the BREEAM "Very Good" standard or equivalent, with immediate effect (relevant versions of BREEAM are available covering offices, retail, industrial, education and healthcare).

If this policy option is to be applied it should require submission of final Code certificates and post-construction BREEAM certificates, as appropriate.

Climate Change Adaptation

All new development will be expected to be adaptable to climate change in terms of the design and layout of both buildings and associated external spaces. In achieving developments which are adaptable to climate change, developers should have regard to the following:

How their design, orientation, materials and construction will minimise overheating and cooling needs.

How development will incorporate green infrastructure, including tree planting, green roofs and walls, and soft landscaping, where possible.

How Sustainable Drainage System (SUDS) can be implemented, and where possible aiming to achieve greenfield run-off rates. Runoff should be managed as close to its source as possible, in line with the following hierarchy:

- Store rainwater
- Use infiltration techniques (porous surfaces) when possible
- Attenuate rainwater in ponds for gradual release
- Attenuate rainwater by storing it in tanks for gradual release
- Discharge rainwater into existing waterway.

Approach to Policy Implementation

A Code for Sustainable Homes and/or BREEAM pre-assessment should accompany a planning application to provide assurance that the design will achieve the required rating. An interim design stage certificate is required before construction can start on site and, following completion, the post-construction review (PCR) and subsequent formal certification is required. Where cost associated with a pre-assessment is considered unreasonable due to the size and/or type of development, negotiations should be made with the planning authority to ascertain supply of details of how the policy can be met.

8.2.3 POLICY OPTIONS: STRATEGIC SITES

Policy Options Development Context

The PPS1 Supplement encourages setting specific policy and targets for strategic sites where greater opportunities exist to reduce CO₂. Strategic sites have not yet been identified, but once they have and likely uses and densities are known, the Council should include suitable carbon reduction targets based on opportunity on the site. It may also be suitable to set higher Code and BREEAM target aspirations where they are believed to be achievable. Swale Borough Council should also seek opportunities to set higher targets on sites that come forward where significant potential is present. Targets can be set in the Core Strategy for strategic sites, and also in Development Briefs. The development typologies developed as an Addendum to this study should be used as a tool to help the Council identify the likely carbon reduction capability of sites, and the viability of such measures. The assumptions used in the typologies may not reflect the eventual site proposals. Therefore, the energy strategies submitted for each site should discuss the proposals' potential and outline how the carbon reduction target will be met (or where it cannot, how carbon reduction can be increased as far as feasible).

Policy Option:

Strategic Sites

Where suitable strategic sites come forward, we recommend the Council require the following:

An energy strategy, including phasing requirements, should be developed for the entire site and surrounding area. This will guide the installation of low carbon infrastructure in a coordinated way, and ensure that individual developments on the site can be taken forward in a carbon and cost-efficient manner. All energy strategies for sites in or near feasible district heating areas, as identified in the Energy Opportunities Map, should include feasibility assessment for district heating and CHP.

Based on feasibility study results, carbon reduction targets relative to Building Regulation standards or the Code for Sustainable Homes/BREEAM targets should be set for strategic sites to drive additional carbon reductions. Calculations showing the achievement of the required carbon reduction should be provided to the Council using the standard methods outlined in Building Regulations.

Approach to Policy Implementation

Reductions in carbon emissions should be supplied using the standard measurements from Building Regulations. An energy statement should be submitted with the planning application that clearly demonstrates how targets are met.

8.3 STRATEGIC COMMUNITY-WIDE INTERVENTIONS

The third policy area addresses strategic, stand-alone energy opportunities, and those that are not necessarily related to specific development proposals.

8.3.1 POLICY OPTIONS: RENEWABLE ENERGY

Policy Options Development Context

The binding national renewable energy target of 15% of total energy to be generated from renewable sources by 2020 can be delivered through a combination of renewable electricity, heat, and transport fuel. In 2009, the government outlined how it planned to meet this target. The Renewable Energy Strategy set the following renewable targets: 30% of total electricity to be sourced from renewables, 12% of total heat, and 10% of total transport fuel. Planning plays a key role in all three of these areas.

The electricity portion of the targets set will partially come from the national government's contribution, including offshore wind turbines among other major projects. However, a substantial proportion is still expected to come from LPAs, where opportunities exist.

The South East had set an overall target of 10% of electricity from renewables by 2020 but subsequent studies were engaged to review that target upwards. Based on resources identified in this study, we believe achievement of a higher target of 30% is possible and should be set as an aspiration. The 12% heat target on a national scale will be delivered and supplied primarily in conjunction with the built environment, and therefore, Swale should contribute to that target wherever opportunities exist to take advantage of renewable heat. With a large proportion of industrial activity in the area, some organisations have already started to take advantage of the costs savings inherent in using renewable heat in the form of district heating networks and CHP plants. Sites such as the Kemsley Paper Mill and Kent Science Park represent energy and cost saving evidence for other industries in the area. Considering the potential for heat sharing, especially among manufacturing plants in Swale, and the potential for district heating, the national heat target is recommended. Chapter 4 has demonstrated a range of resource options available to meet both electricity and heat targets.

Delivery of the targets will partially depend on the emerging policy for Kent Downs AONB, which covers the southwestern portion of the Borough. It is important for the Council to work with Kent Downs to determine suitable policy for the park area, and whether there is a differentiation in policy according to the type or location of renewable energy. Wind energy may be suitable in some areas where it has limited landscape impact (and can pass the Kent Downs ANOB test discussed in chapter 4). Bio-crops are more likely to be considered, and should be discussed with the Kent Downs.

Planning Recommendation:

The Council should engage with the Kent Downs Area of Outstanding Natural Beauty Authority to develop a clear policy on wind turbine installations and bio-crop growth within the National Park. We recommend that policy for wind energy be tied to a flexible visual impact assessment process, rather than a blanket restriction.

Policy Option:**Renewable Energy**

Swale Borough demonstrates significant potential for inclusion of district heating, biomass heating and micro-generation and should aim to meet at least the national heat target of 12% or above.

Swale should assist in the delivery of its portion of the 30% electricity from renewables by 2020 using its potential for combined heat and power, wind energy, solar farms and micro-generation.

Applications for low carbon and renewable energy installations should generally be supported in the area, except where adverse effects would be seen. The area is seeking new renewable energy generation capacity to deliver an appropriate contribution towards the UK Government's binding renewable energy target.

Approach to Policy Implementation

If the Council wishes to support the policy option and its targets, it will need to develop decision criteria. In the context of national policy in PPS22 and the PPS1 Supplement, (including the consultation draft of the PPS on Planning for a Low Carbon Future in a Changing Climate), these would need to consider the following: local amenity; ecology; landscape and visual impact; cultural heritage; the technologies; examining the impacts and benefits; and community involvement and ownership.

Monitoring of the targets included in the proposed policy can be calculated from the expected energy demand baseline derived in Chapter 3. The nature of the renewable energy resource in Swale means that much of this is likely to be delivered through decentralised heat and/or power schemes and wind energy; however, solar photovoltaics and other technologies may also be important factors in achieving targets. The role of the local authority and communities as delivery agents will be important and is explored in more detail in Chapter 7.

8.3.2 POLICY OPTION: DELIVERING THE ENERGY OPPORTUNITIES MAP

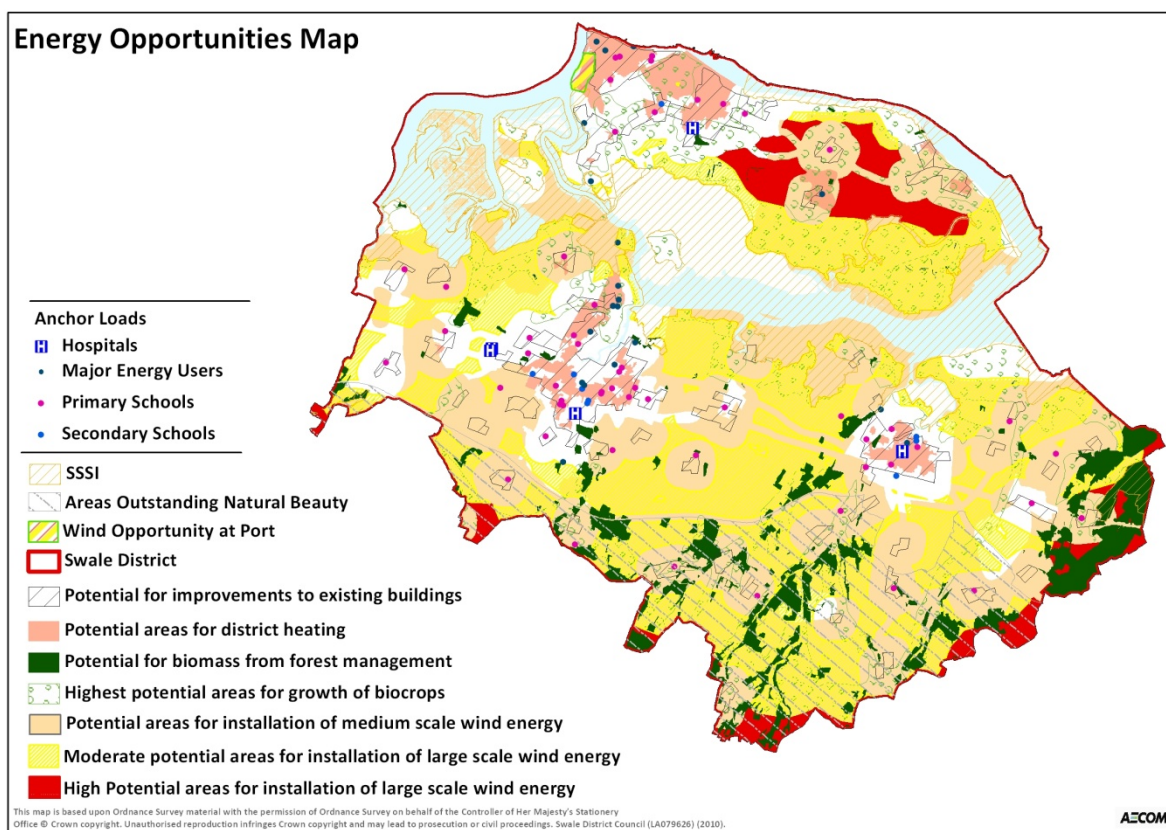


Figure 68: Energy Opportunity Map

Policy Option Development Context

The various decentralised low carbon and renewable energy opportunities across the Borough have been compiled to create an Energy Opportunity Map. The EOM acts as the key spatial map for energy projects in Swale. It presents a key evidence base, which underpins policies, targets and delivery mechanisms described here and can set out where money raised through allowable solutions or other funds can be spent. The EOM should also be used to inform the Borough Council and Local Strategic Partnership’s policy making in the Sustainable Community Strategy, investment decisions, and other corporate strategies.

Policy Option

Delivering the Energy Opportunities Map

Decentralised, low carbon and renewable energy is a priority for the Council. Planning applications for new development in Swale will need to demonstrate how they contribute to delivery of the ‘Energy Opportunities Map’.

8.3.3 POLICY OPTION: PRIORITY AREAS

Policy Option Development Context

The planning policy approach represents the application of national policy to the specific Swale context. The PPS1 Supplement on Planning and Climate Change and PPS22 (Renewable Energy) are both supportive of wind power. Specifically in relation to Borough solutions, the Supplement requires the following:

Along with criteria based policies, identify suitable sites for decentralised and renewable or low carbon (DRLC) energy and supporting infrastructure.

Expect a proportion of energy supply for new development to be secured from DRLC energy. This can involve utilising existing and fostering new opportunities to supply development. For example, co-locating potential heat customers and suppliers, requiring development to connect to an identified system or to be able to in the future, setting out how proposed development should contribute to securing the DRLC energy system from which it would benefit, and facilitate connection.

Precedent policy exists for these types of strategic areas within the draft Manchester City Council Core Strategy and Bristol Core Strategy. The Manchester City Core Strategy includes details of a policy relating to areas for low carbon, decentralised and renewable energy development. This precedent policy is listed below;

Policy Approach En 2 – Within Manchester it is considered that the following strategic areas will have a major role to play in achieving an increase in the level of decentralised, low carbon and renewable energy available:

- *Regional Centre, which also includes the Oxford Corridor and Sport city*
- *District Centres*
- *Inner Areas*
- *Strategic Housing sites*
- *Strategic employment sites*

The City council will work with all relevant stakeholders, which may include residents, private sector partners, utilities companies, neighbouring authorities and other public sector bodies, as appropriate, to bring forward more detailed proposals for decentralised low and zero carbon energy infrastructure in these areas.

Where investment or development is being undertaken into or adjacent to a public building, full consideration shall be given to the potential role that the public building can have in providing an anchor load with a decentralised energy network.

Bristol Core Strategy has taken a similar approach, encouraging renewable development where appropriate to the landscape and prioritising CHP and district heating in key urban areas:

‘Proposals for the utilisation, distribution and development of renewable and low carbon sources of energy, including large-scale freestanding installations, will be encouraged. In assessing such proposals the environmental and economic benefits of the proposed development will be afforded significant weight, alongside considerations of public health and safety and impacts on biodiversity, landscape character, the historic environment or the residential amenity of the surrounding area.

The use of combined heat and power (CHP), combined cooling, heat and power (CCHP) and district heating will be encouraged. Development will be expected to incorporate, where feasible, low-carbon energy generation and distribution by these means. Within Heat Priority Areas, development will be expected to incorporate infrastructure for district heating, and will be expected to connect to existing systems where available.’

The priority areas listed in the policy option below have been identified based on the analysis carried out in Chapters 4. The purpose of the policy is to prioritise district heating and community wind in areas where opportunities are the greatest.

Policy Options

Priority areas

The Council will favourably consider applications for development which will support the following energy priority areas:

DISTRICT HEATING PRIORITY AREAS

The Energy Opportunities Map (EOM) highlights the areas in the Borough with high heat density. The Council should consider these as priority areas for installing district heating systems.

The Council will support the delivery of district heating in these areas and will work with all relevant stakeholders, which may include residents, private sector partners, utilities companies, neighbouring authorities and other public sector bodies, as appropriate, to bring forward more detailed proposals for district heating in these areas.

Development within the priority area should install the secondary elements of a district heating network (i.e. from the wider network to properties), unless it can be shown not to be viable or feasible. Should development come forward prior to a district heating network being in place, developers should provide a containerised energy centre to provide temporary supply. Where appropriate, applicants may be required to provide land, buildings and/or equipment for an energy centre to serve proposed or multiple developments.

New residential and commercial development should be designed to maximise the opportunities to accommodate a district heating solution where feasible, considering: density; mix of use; layout; and phasing.

WIND POWER PRIORITY AREAS

The Energy Opportunities Map (EOM) highlights potential favourable locations for wind turbines.

The Council will look favourably on the addition of new wind turbines at the medium or large scale as part of any redevelopment of industrial parks, commercial areas or public realm located a suitable distance from residential areas. The location of wind turbines in these areas should not be to the detriment of local wildlife. Applications would be encouraged from community groups and individuals in priority areas.

Sites within Kent Downs AONB are subject to (evolving) policy from Natural England.

Approach to Policy Implementation

Developments greater than 10 dwellings within or near the district heating priority areas should investigate the feasibility of installing a district heating network within the site. A planning application should provide details of how the opportunities will be implemented to allow the LPA to coordinate expansion of the network across priority areas. Where infrastructure installation is deemed to infeasible, details of the viability assessment should be provided with the application.

As a means of fulfilling the intention of installing district heating networks, it is recommended that a Local Development Order (LDO) is designated, either for district heating networks across council areas or specifically in priority areas. Introduced in the 2004 Planning and Compulsory Purchase Act and amended by the 2008 Planning Act, LDOs grant permission for types of development specified in the Order and by so doing, removes the need for developers to submit a planning application.

The PPS1 Supplement supports their use in bringing energy projects forward. A pilot is underway for the Barking Power Station strategic heat main promoted by the London Development Agency. Barking and Dagenham have recently received funding for a pilot project using a LDO for implementing a district heating system.

Applications should be encouraged for wind energy developments directly related to new domestic and non-domestic developments, particularly in areas identified in the Energy Opportunities Map.

If the nature and/or size of the strategic sites identified prove to be significant enough, they should complete an energy strategy to ensure that the best options are identified, taking into account the whole site and its surroundings. The energy strategy should outline the proposed options and how these will be delivered in coordination with Borough-wide initiatives.

8.3.4 POLICY OPTION: ADAPTATION STRATEGY

Policy Option Development Context

Swale faces some serious challenges associated with predicted climate change, as demonstrated in Chapter 5. There are strategic interventions that could be applied to lessen risks to vulnerable communities and infrastructure. This study has identified some key opportunities including improvement of buildings, green infrastructure integration, retrofitting of SUDS into existing areas, and a flood mitigation measures. The Council should use Kent’s Local Climate Impact Profile (LCLIP) to help the Borough understand their exposure to changing weather and climate and historical economic effects.

Building from the LCLIP, the Council should develop a Climate Change Adaptation Action Plan that sets out clear actions to help the Borough adapt to the predicted effects of climate change. The strategy should prioritise actions depending on the level of risk and exposure. Risk should be assessed based on the social, economic and environmental impacts. This strategy should be coordinated with local green infrastructure strategy and flood management plans.

Planning Recommendation:

The Council should use Kent’s Local Climate Impact Profile to understand local vulnerabilities. Following from this a climate action plan for Swale needs to be developed to identify and prioritise solutions. This should be taken forward as a collaborative approach between planning and wider council services. In this way, the Council should develop a clear Climate Change Adaptation position with supporting policies to structure the response to climate change risk.

Policy Options:

The core strategy should support adaptation measures that need to occur separate from new residential or commercial developments (e.g. improvements in existing areas, strategic adaptation measures):

The Council will support and encourage the integration of strategic climate change adaptation measures in the district, including the provision of green infrastructure, SuDS and flood risk management features.

Approach to Policy Implementation

Adaptation measures should be further investigated and prioritised. There is a clear opportunity to support general adaptation measures throughout the Borough. It will be important to ensure adaptation measures are in keeping with the needs of designated areas such as conservation areas and the AONB, and that they deliver local architectural, biodiversity and amenity priorities.