

## From Ollie Eggenton on sustainability of buildings

The documents discussed were:

Part L Building Regulations

(Energy): <https://www.gov.uk/government/publications/conservation-of-fuel-and-power-approved-document-l>

Part O Building Regulations

(Overheating): <https://www.gov.uk/government/publications/overheating-approved-document-o>

Greater London Authority guidance on Whole Life Cycle Carbon

Assessments: [https://www.london.gov.uk/sites/default/files/lpg\\_-\\_wlca\\_guidance.pdf](https://www.london.gov.uk/sites/default/files/lpg_-_wlca_guidance.pdf)

In terms of targets we should be pushing to make our new buildings more sustainable, I have set some generic text out below for people to use as they see fit:

### **Regulated Operational Carbon reduction targets**

SADC should implement % carbon reduction targets for new dwellings and buildings, against the target emission rates for building regulation compliance. Hertsmere's latest planning policy requires a 40% reduction for major development, and in Watford, 19%. We propose a reduction target of 40% and would like to see reference to the energy hierarchy; Be Lean, Be Clean, Be Green to enable this reduction to be achieved. In absence of any hard target, the council has no power to demand low carbon development. Such targets would mean that new development can have planning conditions imposed to ensure the resultant scheme has achieved compliance with policy.

### **Embodied Carbon / Whole Life Carbon benchmarks**

SADC should introduce whole life cycle carbon benchmarks and targets for new, major development to aim for. This should be reported by developers in the form of a Whole Life Cycle Carbon Assessment at the planning stage, and could follow the benchmarks and methodology set out in the GLA's guidance: [https://www.london.gov.uk/sites/default/files/lpg\\_-\\_wlca\\_guidance.pdf](https://www.london.gov.uk/sites/default/files/lpg_-_wlca_guidance.pdf). In absence of benchmarks and reporting targets, it would be almost impossible for the council to understand whether or not a development has made good progress in reducing its embodied carbon footprint. Equally, without benchmarks, developers will have no gauge on what they need to aim for. Proposing consideration of whole life carbon, without setting some form of targets, is nonsensical and impractical.

### **Individual dwelling alterations / extensions**

Minor development should, at the very minimum, be required to demonstrate some improvement in the energy performance certificate as a result of the proposed works. This will encourage homeowners to consider adding insulation, energy efficient glazing, and sustainable heating systems at an opportune moment.

### **Carbon offset price**

SADC should follow local precedent set by Hertsmere, and use a carbon offset figure of £115 per tonne (regulated CO2) over 30 years (£3,450 per tonne) for any residual carbon dioxide not reduced through on-site measures, for major development only. It is imperative that the council has a pipeline of sustainable projects that will be recipients of these funds.

### **Points from St Albans Cycle Campaign on Sustainable Transport**

We are broadly supportive of the Plan, but we feel that there are more opportunities that the Council could take in the Plan to prioritise cycling and walking. Specifically;

1. There are many policy statements in the plan that will guide planning, but there are few hard targets (i.e. we aim to get X% of journeys less than 2 miles being done by cycling and walking).
2. Funding for cycling infrastructure remains uncertain, with the LCWIP still to be confirmed and little clear funding sources for its implementation being identified.
3. The Council must impose mandatory requirements on major developments (*musts* rather than *shoulds* in policy statements).
4. Cycle parking needs to be given priority space over car parking in residential areas, shopping sites and schools.

**Herts CPRE** have made a video for their webpage about the St Albans Draft Local Plan <https://www.cpreherts.org.uk/news/watch-our-new-video-st-albans-district-draft-local-plan/>