MILTON KEYNES CORE STRATEGY

MATTER 7 OTHER AREAS OF CHANGE, SUSTAINABLE CONSTRUCTION, COMMUNITY ENERGY NETWORKS AND RENEWABLE ENERGY

REPRESENTATIONS ON BEHALF OF PERSIMMON SPECIAL PROJECTS

Pegasus Planning Group
Pegasus House,
Querns Business Centre
Whitworth Road
Cirencester
Glos
GL7 1RT

Telephone: (01285) 641717  Facsimile: (01285) 642348

PPG Ref: CIR,P.0422

Date: 31st May 2012

COPYRIGHT
The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Ltd
7.1 Having regard to the scale of growth expected in the Other Areas of Change, does Policy CS 8 give sufficient guidance about the planning priorities for them?

1.1 Persimmon Homes have no comments on this question.
7.2 Are the interrelationships between these areas and the proposals for Central Milton Keynes and the Strategic Land Allocation properly considered?

1.1 Persimmon Homes have no comments on this question.
7.3 Having regard to Policies CS 4 and CS 8, should the priorities for Bletchley and Wolverton town centres be set out more clearly in the Core Strategy? Is it appropriate that the development management policies DPD should set out priorities for the key centres (reference to Core Strategy paragraph 8.8)?

1.1 Persimmon Homes have no comments on this question.
7.4 With reference to Policy CS 14, are the standards for sustainable construction in the respective areas of the borough and in conversion/alteration of existing buildings justified, deliverable and in keeping with national policy? What would be required to demonstrate technical or financial non-viability?

1.1 Policy CS 14 is setting standards above current building regulations 2010 through the assessment of sustainable construction being achieved through BRE assessment method Code for Sustainable Homes (CfSH). This assessment technique is not mandatory within current legislation for what constitutes sustainable construction.

1.2 The expectation of Code level 4 for the CfSH plus 20% as a minimum reduction of carbon dioxide savings by renewable energy and/or low carbon technologies is in excess of current Building Regulations Part L 2010 and also the proposed and currently being consulted changes to Building Regulations Part L and Part G 2013.

1.3 The Climate Change Act 2008 set legally binding targets for the reduction carbon dioxide emissions which are being progressed through the changes in Building Regulations potentially in 2013 and the 2016 changes to achieve zero carbon homes. Policy CS14 sustainable construction is in excess of the legislation within the Climate Change Act 2008.

1.4 In terms of viability, the cost of the technologies typically recommended to achieve these levels of reduction have the potential to add a further prohibitive costs to the construction of dwellings and as a consequence force developers to contribute to the Milton Keynes Carbon Off-set Fund. The determination of the carbon off-set cost is out of the control of the developer and so functions as an additional tax without alternatives and enables the council to set a price which isn’t reflective of the current value of carbon within the international trading platform of EU ETS, as set out under Kyoto Protocols.

1.5 Persimmon Homes consider that the Core Strategy is not consistent with national policy.
7.5 *Can financial contributions be expected to the carbon offset fund, given the statutory tests that apply to planning obligations?*

1.1 The proposed introduction of Carbon Off-set funds under the proposed concept of allowable solutions, as proposed by the Zero Carbon Hub, are not set within current legislation but are proposed for introduction alongside the Building Regulations changes in 2013.

1.2 The requirement to contribute to the Carbon Off-set fund is beyond current legislation and is draconian and not in keeping with the market being able to deliver a solution that may be less costly and more effective. The fund requires that only the LPA can deliver a technical solution without consultation as to what an eligible project is and how this will be delivered.

1.3 Persimmon Homes consider that the approach set out in the Revised Submission Core Strategy is not consistent with national policy.
1.4 7.6 Are the requirements of Policy CS 15 justified by substantive evidence of technical and financial feasibility?

1.1 Policy CS 15 shows no evidence that community energy networks have social, economic or environmental benefits from this type of technology. Typically, the use of an ESCo contracts by the utility company is anti freedom of trade as it requires the dwelling to commit to supply of heat exclusively whilst this type of utility supply is unregulated and not subject to controls by Ofgem.

1.2 With regard to the myth of carbon savings and increased efficiency through community networks, The publication of Sustainable Energy – without the hot air by David J C MacKay, states “decentralised combined heat and power is another looming mistake…they are 7% more efficient than local condensing boilers.