

Matter 8 – Built and natural environment and environmental hazards

Issue – Does the Strategy Document Update set out positively prepared policies relating to the built and natural environment and environmental hazards which are justified, effective and consistent with national policy?

Questions

Design and landscape

a) What standard of energy efficient design is the Council seeking through part B9 in Policy ENV1?

1. The HBF considers that it is not clear what energy efficient design that Council is seeking to achieve through Part B9 of Policy ENV1.
2. The HBF supports moving towards greater energy efficiency via a nationally consistent set of standards and a timetable for achieving any enhancements which is universally understood and technically implementable. The HBF acknowledges that the Government has not enacted its proposed amendments to the Planning & Energy Act 2008 to prevent the Council from stipulating energy performance standards that exceed the Building Regulations. However, the HBF considers that the key to success is standardisation and avoidance of every Council in the country specifying its own approach to energy efficiency, which would undermine economies of scale for both product manufacturers, suppliers and developers.
3. The HBF Watt a Save report¹ (July 2023) finds that the home building industry collectively reduced household carbon emissions by 500,000 tonnes last year, saving buyers more than £400million in energy costs. The analysis of energy performance data for new and older properties, finds energy bills for new homes are on average 55% cheaper, saving households £135 on monthly running costs. This saving rises to over £180 per month for purchasers of houses, rather than flats or bungalows, totalling £2,200 a year. The average new build used 105.37kWh per m² per year, while the average existing property used 248.47kWh per m². Due to the decreased energy usage along with new technologies, improved industry knowledge and low carbon heating, in the year to March 2023, the average new build emitted 1.4 tonnes of carbon, just 40% of the 3.6 tonnes emitted by an older property, a saving of 2.2 tonnes per year

b) What are the Council's reasons for not seeking to implement the optional technical water efficiency standard of 110 litres per person per day?

4. The Building Regulations require all new dwellings to achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure. The Optional Technical Housing Standard is 110 litres per day per person.

¹ Watt a Save: The energy efficiency of new build homes (July 2023, HBF)
https://www.hbf.co.uk/documents/12662/Watt_Energy_Efficiency_New_Homes_finalv2.pdf

Home Builders Federation response to the
East Riding Local Plan Update Examination
Inspector's Matter, Issues and Questions

5. A policy requirement for the optional water efficiency standard must be justified by credible and robust evidence. If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day, then the Council should justify doing so by applying the criteria set out in the PPG. PPG² states that where there is a '*clear local need, Local Planning Authorities (LPA) can set out Local Plan Policies requiring new dwellings to meet tighter Building Regulations optional requirement of 110 litres per person per day*'. PPG³ also states the '*it will be for a LPA to establish a clear need based on existing sources of evidence, consultations with the local water and sewerage company, the Environment Agency and catchment partnerships and consideration of the impact on viability and housing supply of such a requirement*'. The Housing Standards Review was explicit that reduced water consumption was solely applicable to water stressed areas. Yorkshire and East Riding are not considered to be an area of Water Stress as identified by the Environment Agency⁴. Therefore, the HBF considers that requirement for optional water efficiency standard is not justified nor consistent with national policy, and supports the Council in not introducing this as a policy requirement.

c) What is the Council seeking to achieve in terms of amenity? Does part B4 in Policy ENV1 provide clear and effective guidance?

6. The HBF does not wish to answer this question, at this time.

² ID: 56-014-20150327

³ ID: 56-015-20150327

⁴ 2021 Assessment of Water Stress Areas Update: <https://www.gov.uk/government/publications/water-stressed-areas-2021-classification>