

Matter 9: The approach to climate, biodiversity, sustainable construction and heritage

Issue

Whether the approach to policies for climate, biodiversity, sustainable construction and heritage is justified, effective and consistent with national policy.

Relevant Policies – GS7, CEA1, CEA2, CEA3, CEA4, CEA5, CEA6, CEA7, CEA8, CEA9, CEA10, CEA11, CEA12, CEA13, CEA14. CEA15, HE1

Questions

Policy CEA1 – Sustainable Buildings

9.11 Are the requirements of criteria A and B of the policy sufficiently clear and unambiguous so it is evident how a decision maker should react to development proposals?

No comment.

9.12 Do the requirements of the policy which require energy efficiency standards which go beyond Building Regulations to have a well-reasoned and robustly costed rationale which ensures that development remains viable and the impact on housing supply and affordability is considered in accordance with the Framework? How do the targets relate to the new Building Regulation requirements for energy efficiency which are due to have effect from March 2027?

Part A of this policy outlines that all new development must take a fabric first approach that reduces operational carbon, reduces whole life cycle carbon emissions and incorporates information of net zero generation technologies. HBF do not disagree that these are important factors in reducing carbon emissions and have been supporting government through the Future Home Hub to ensure the latest building regulations, the Future Homes Standard (FHS), achieve these objectives. While there has been a delay in the adoption of this new standard the Government confirmed earlier this year, as is noted in the question, that the FHS will become effective in 2027. The new standard sets performance requirements that ensure that new homes will have a high fabric standard and use low-carbon heating and will mean that all new homes built will be zero carbon ready – meaning that no further work will be required to have zero carbon emissions once the grid has decarbonised. The standard will also require the use of roof mounted solar photovoltaics – unless there is a reason why this can genuinely not be achieved.

The expectation is that on average the Future Homes Standard will see a 35% improvement on 2021 building regulations. Council's policy is an improvement on that level, but it must be noted that the FHS does achieve significant improvements with the added benefit of being developed alongside not only house builders but the

supply chains and labour markets that supports them. This means that there is confidence that they can be achieved without impacting on the viability and deliverability of development.

As to whether the aspiration of a 60% improvement on the 2021 Building Regulations is deliverable the Council have provided evidence on their feasibility starting at page 112 of the Carbon and Climate Study Analysis Paper. The start of this section correctly notes that these costs can vary between developer and that viability however, the general conclusions that the additional costs would be minimal. What is not clear from the Council's evidence is how the cost analysis relates to the Impact Assessment for the Future Homes Standard. For example, in Table 26 the cost of heating generation is £1,980. If this is assumed to be an Air Source Heat Pump (ASHP) this is significantly lower than the £5,560 to £6,647 range in Government's Impact Assessment¹ (IA). When compared to gas heating in a home built to current standards the additional cost in the IA of providing a ASHP is between £3,000 to £4,000 more per dwelling. More detailed comparison of cost differential between what is proposed and the FHS is required.

Another element that does not appear to have been factored into the assessment is the feasibility of achieving the correct level of airtightness required to meet the proposed standards. Not only will there be a cost of achieving this it is also an area of concerns as to how it will impact on the rate at which new homes are delivered. Achieving the necessary air tightness to meet the council's proposed can be difficult at scale and may impact on the rate at which new homes can be built. Indeed, what appears to be missing from the Council's evidence is discussions with the development industry as to their ability to meet these standards and whether it will impact on the timeline for delivery of development and the rate at which homes come forward.

9.13 Are the targets for whole lifecycle carbon emissions justified by the evidence, effective and consistent with national planning policy?

Research by the Future Homes Hub has undertaken some benchmarking as to what is currently being achieved with regard to whole life carbon. This has shown that on average each new home has a whole life carbon emission of emits 1,226 kgCO₂e/m². While the study recognises that within this there is a significant range of performance it provides an indication that in order to achieve this level of embodied carbon performance will be challenging. As such it is concerning that the cost of achieving this standard does not appear to be included in the Viability Assessment. For some development the cost will be significant and alongside this the ability of the supply chain to support the delivery of homes at this level of embodied carbon is untested and has not been considered by the Council. Requiring all homes to achieve this level of whole life cycle will impact on the deliverability of development across Milton Keynes and without any consideration as to its impacts its inclusion the local plan is unjustified.

9.14 Are the requirements for 25% of electricity demand to come from on-site low/zero carbon generation in addition to the reduction in target emission rates in criteria C.1.a and C.2.a. If so, is this approach justified and consistent with national planning policy?

¹ Table C2 Future Homes Standard [Final Impact Assessment](#) (MHCLG March 2026)

As set out above the Future Homes Standard will require the provision of solar photovoltaics and as such it is not necessary for the council to set out an alternative standard in this policy.

9.15 For effectiveness, should the policy be clear how the requirements will apply to industrial development, warehousing, schools, not-for-profit organisations and local community halls and meeting places?

No comment.

9.16 What is the level of financial contribution for the Carbon Offset Fund, is it justified and should the amount of financial contribution for the Carbon Offset Fund be set out in the policy?

HBF do not consider the use of a carbon offset fund to be justified. There is no in support in national policy for the use of carbon offset funds.

9.17 Is it effective and practical to require monitoring of building performance?

No. Also it is not clear as to what will be done with this data and how it will be used by the council.

9.18 Would the requirements in criterion F of the policy apply to all developments or just those where criterion C is relevant? Is the threshold justified? How will developers demonstrate compliance?

This is for the Council to answer.

Policy CEA2 – Green roofs and walls

9.19 Is the policy effective and sufficiently flexible and are the requirements for green roofs and walls within the policy justified by the Plan's viability evidence?

These have not been included in the viability evidence. The reason for this in paragraph 5.54 is that this is an aspirational policy and not a requirement. Without any consideration as to the viability of this policy, it is unjustified and should be deleted. If the policy is meant to be aspirational as is suggested in the Viability Study, then it must be rewritten as one that is supportive of green roofs and walls where they form part of the development rather than one that requires the developer to justify why they haven't been included.

Policy CEA5 – Water Efficiency

9.24 Is the requirement for new residential development to achieve a water efficiency standard of 93 litres per person per day justified by evidence and consistent with national planning policy?

As set out in our representation HBF does not consider this level of water efficiency to be justified or consistent with national policy.

9.25 Are the BREEAM requirements for non-residential developments and the requirements of criterion C of the policy justified by the evidence and viable?

No comment.

9.26 Should the requirement for a completion certificate be included in the policy?

No comment.

9.27 Is there unnecessary repetition in the policy with regard to criteria C1 and C4?

There would appear to be repetition between these two parts of the policy that will need to be addressed by the Council.

Policy CEA9 – Biodiversity and habitats network

9.40 Is the policy justified and consistent with national policy and does it serve a clear purpose? Is it sufficiently clear and unambiguous so it is evident how a decision maker should react to development proposals?

As set out in our representations HBF does not consider it necessary for the local plan to include a policy on Biodiversity Net Gain as this is a legislative requirement that is supported by ample regulation and guidance.

9.41 Is the suggested modification to paragraph B of the policy by the Council in Document CD28 necessary for soundness?

No comment.

Policy CEA11 - Urban greening, trees and woodland

9.46 Are the requirements for the Urban Greening Factor, Urban Tree Canopy Cover standard and woodland creation and protection sufficiently flexible, justified by robust evidence, and viable?

The assumption is that these costs form part of the £25,000 allowance for contribution towards strategic infrastructure. However, what is not clear from this assessment is whether any consideration had been given to the impact on some development, particular those in in urban locations on the developable area. In order to achieve the proposed level of urban greening there is likely to be an impact on the number of homes that can be delivered which in turn impacts on viability. Without such considerations the policy, and in particular how it relates to urban development, the policy is unjustified.

9.47 Should the level of financial contribution for off-site woodland creation be specified in the policy?

If the policy is considered to be justified, then offsite provision should be considered as an option for meeting this policy requirement.

9.48 Should the policy be clear whether the requirements of this policy are in addition or would form part of the statutory requirements of biodiversity net gain?

This must be clarified by the council.

9.49 Is the Council's suggested change in Document CD28 to paragraph 330 of the supporting text necessary for soundness and if so, should this be in the policy?

No comment.

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