



LAND AT SOUTH WEST EXETER

OUTLINE PLANNING APPLICATION FOR RESIDENTIAL DEVELOPMENT, MIXED USE LOCAL CENTRE, LAND FOR EDUCATION AND ATP PITCH, LAND FOR COMMUNITY BUILDING, OPEN SPACE, SANG, SUDS WORKS, NEW ACCESS AND HIGHWAYS INFRASTRUCTURE INCLUDING LAND FOR A PEDESTRIAN FOOTBRIDGE AND RELATED WORKS

SUSTAINABILITY STATEMENT

ON BEHALF OF BOVIS HOMES LIMITED

PREPARED BY AP PLANNING

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1.0 INTRODUCTION

1.1 AP Planning is instructed by Bovis Homes Limited – ‘Bovis’ – to project manage the submission of an Outline planning application for residential development, mixed use local centre, land for education and ATP pitch, land for community buildings, open space, Suitable Alternative Natural Greenspace (SANG), Sustainable Urban Drainage Systems (SUDS) works, new access and highways infrastructure including a pedestrian footbridge and related works on land at South West Exeter – ‘SWE’ - in Teignbridge District.

1.2 The proposals are detailed in the supporting documents which comprise the Outline planning application, principally the Environmental Statement prepared in accordance with the EIA Regulations and the Design and Access Statement (DAS).

1.3 The Teignbridge Council validation checklist for major Outline planning applications requires a Sustainability Statement to be submitted summarising how applications will respond to National and local policies which seeks to reduce carbon emissions and deliver sustainable development.

1.4 This Sustainability Statement sets out:

- A summary of National guidance on sustainability and reducing carbon emissions;
- A summary of local policy and the Teignbridge approach to reducing carbon emissions;
- An overview of the sustainability measures set out in the Bovis planning application for the development of land at South West Exeter; and
- Bovis Homes commitment to delivering sustainable new homes.

1.5 This Statement should be read in conjunction with a other documents which make up the Bovis application for land at South West Exeter:

- Environmental Statement: The ES details the overall environmental affects of the development and includes information on sourcing local materials, sustainable construction and flood risk and sustaibnable drainage, enhancing biodiversity and off setting the impact of development on environmentally sensitive areas by delivering SANGs;
- Traffic assessment and Travel Plan: sets out how the location of the site will minimise the need to travel, the availability of non car based modes of travel and specific measurs to ensure that new residents in particular are encouraged to travel sustainably;
- Design and Access Statement: sets out how the design of the Bovis proposals respond to the character and topography of the application site and how the orientation of new homes and good design of non residential buildings can reduce energy demand;
- Planning Supporting Statement: sets out the process of identifying the application site as part of an area allocated for housing and mixed use development and how this has been assessed through the planning system over many years. Also identifies how the Bovis proposals deliver sustaianble development in accordance with the NPPF.

1.6 This Statement focuses on those measures which can reduce carbon emissions and can contribute to delivering a low carbon future.

1.7 Bovis will be continuing to work closely with Teignbridge Council to deliver the housing and other proposals on the Bovis site including the proposed District Heating Network, subject to viability.

2 NATIONAL POLICY ON SUSTAINABILITY

2.1 The delivery of sustainable development lies at the heart of the National planning policy set out in the National Planning Policy Framework (NPPF).

2.2 The ministerial forward to the document notes that 'sustainable' in the context of the phrase 'sustainable development' means ensuring that better lives for ourselves don't mean the worse lives for future generations.

2.3 The NPPF sets out the U.N.'s definition of sustainable development as development which meets the needs of the present without compromising the ability of future generations to meet their own needs.

2.4 The UK Sustainable Development Strategy: securing the future, sets out five guiding principles of sustainable development:

- Living within the planets environmental limits;
- Ensuring a strong healthy and just society;
- Achieving a sustainable economy;
- Promoting good governance; and
- Using sound science responsibly.

2.5 The NPPF sets out that the planning system, through the control of new development, can have an important role to play in delivering these sustainability objectives.

2.6 Paragraph 7 outlines that there are three dimensions to achieving sustainable development:

- Economic
- Social and
- Environmental

- 2.7 An economic role means contributing to building a strong responsive and competitive economy by ensuring that sufficient land of the right type is available in the right places, and at the right time, to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure.
- 2.7 A social role means supporting strong vibrant and healthy communities by providing the supply of housing required to meet the needs of the present and future generations and by creating a high quality built environment with accessible local services to reflect the community's needs and support its health social and cultural well-being.
- 2.8 An environmental role means contributing to protecting and enhancing our natural built and historic environment; and, as part of this helping to improve biodiversity, use natural response resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.
- 2.9 After setting out the general principles for achieving sustainable development the NPPF also highlights particular measures to help to achieve a low carbon future which takes into account to climate change.
- 2.10 One of 12 planning principles set out at para 17 of the NPPF seeks to support the transition to a low carbon future and a changing climate, taking full account of flood risk and coastal change.
- 2.11 It encourages the reuse of existing resources including conversion of existing buildings and encourages the use of renewable resources for example by the development of renewable energy.

- 2.12 In considering the promotion of sustainable transport paragraph 30 of the NPPF sets out that encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion.
- 2.13 It sets out that all developments that generate significant amounts of movements should be supported by a Transport Statement or Transport Assessment.
- 2.14 Plan making and planning decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.
- 2.15 The NPPF goes on to say at paragraph 36 that all developments which generate significant amounts of movement should be required to provide a Travel Plan which is a key tool.
- 2.16 The NPPF recognises the role of good design in achieving sustainability objectives and reducing the need for energy use.
- 2.17 Finally section 10 of the NPPF deals specifically with the challenge of climate change.
- 2.18 This sets out at paragraph 95 that in supporting a low carbon future local planning authorities should plan for new development in locations at which which reduce greenhouse gas emissions and actively support energy efficiency improvements to existing buildings.
- 2.19 When setting any local requirement for building sustainably Councils should do so in a way consistent with the Government's zero carbon buildings policy and adopt national standards.

- 2.20 When considering proposals for decentralised energy supplies they should be suitable for the type of development involved and should be viable.
- 2.21 New development should take into account the landform, layout, building orientation, massing and landscaping to minimise energy consumption.
- 2.22 Paragraph 97 of the NPPF sets out measures to increase the use and supply of renewable energy and low carbon energy which includes promoting energy from renewable or low carbon sources and support for measures which deliver low carbon energy systems.

3 TEIGNBRIDGE SUSTAINABILITY POLICIES

- 3.1 The Teignbridge Local Plan was adopted in May 2014. The document sets out planning policies for the period to 2033.
- 3.2 The planning policies include the allocation of the South West Exeter development site which, together with land in Exeter City will deliver 2500 homes, and a mix of social and community infrastructure together with green space.
- 3.3 The South West Exeter allocation is the largest single housing proposal in the Teignbridge Plan.
- 3.4 The Bovis application site is part of the South West Exeter allocation. It will deliver a significant proportion of the overall South West Exeter proposals bringing forward new homes, community and other facilities and large areas of green space to meet the needs of the new and existing local residents.
- 3.5 In addition to policies SWE1,2 and 3 which allocate the land at South West Exeter two other policies are of particular relevance to sustainability.
- 3.6 Policy S7 sets out the overall target of the Council to seek to achieve reductions in carbon emissions, per person, arising from within Teignbridge of about 42% of 2009 levels by 2030.
- 3.7 The policy identifies that new development can have a significant effect in reducing the carbon footprint overall by planning for development in sustainable locations and ensuring that the development itself is constructed in a sustainable way and which minimises emissions when built.

- 3.8 Policy EN3 sets out that development proposals should seek to minimise their carbon footprint during construction and in use to achieve the policy target set out in policy S7.
- 3.9 It continues that major developments will be required to produce a Carbon Reduction Plan to indicate how this could be achieved.
- 3.10 The Council have produced specific guidance on carbon offsetting which looks in detail at individual development proposals when they reach the detailed planning stage, so as to ensure that new development can, if required implement measures to offset its carbon footprint.
- 3.11 It is noted in the guidance for the carbon offsetting calculator that this detailed assessment of carbon emissions is only possible once planning proposals have reached the detailed stage, when the footprint of individual buildings, construction methods and potential emissions can be assessed in detail.

4 BOVIS APPLICATION - SUSTAINABILITY MEASURES

4.1 In accordance with national guidance set out in the NPPF, and the requirements of policies S7 and EN3 of the adopted Local Plan, the Bovis application will seek to minimise the carbon footprint of the new development and ensure that both during construction and when completed the development will seek to minimise carbon emissions so far as possible.

4.2 If required Bovis will prepare a Carbon Reduction Plan which can detail these measures more accurately as phases of the development are delivered through Reserved Matters. This could be the subject of a condition on the Outline Planning Permission.

Planning for sustainable development

4.3 The Planning Supporting Statement submitted with the Bovis application sets out that the South East Exeter site has been allocated following very lengthy and detailed assessment through the planning policy and plan making process over more than a decade.

4.4 It has been consistently recognised that locating major development on the edge of Exeter, one of the largest cities in the South West, can have a major beneficial effect in reducing people's need to travel.

4.5 The new development is planned to be located next to the existing urban area in a location adjacent to an existing park and ride facility, on existing high-quality bus routes, and within short walking/cycling distance of the proposed Marsh Barton rail halt.

4.6 The Planning Statement identifies that the Bovis deliver sustainable development in the context of the NPPF. The proposals are designed to deliver a significant boost to housing supply in Teignbridge, contributing to the Government's objectives of providing new homes whilst at the same time carefully assessing, protecting and enhancing key environmental assets.

Transport Assessment

- 4.7 The Transport Assessment (TA) submitted with the application details that the location of the site is well placed to ensure that new residents and those making use of the social and community facilities which are planned as part of the Bovis development will have the maximum opportunities to make use of public transport, walking and cycling as alternatives to the use of the private car.
- 4.8 The road which passes through the site, the A379 is already a bus corridor and the TA sets out the opportunities to enhance bus frequency and allow buses to access the site as part of measures to enhance public transport usage.
- 4.9 The Transport Assessment identifies that through the Community Infrastructure Levy the County Council will deliver improvements these bus services, and contribute to the implementation of the Marsh Barton rail halt which lies a short distance away from the site.
- 4.10 The TA highlights that the Bovis site lies adjacent to the existing Matford Park and Ride which provides high-frequency bus links to Exeter city centre and many of the City's major employment areas.
- 4.11 The TA demonstrates that the site lies within close proximity of the existing and proposed Peamore employment development area and that there are good quality existing cycle and footpath links from the site to Peamore.
- 4.12 There are also good quality footpath and cycle links to the surrounding area, in particular Alphington, Exminster and then major employment area at Matford.
- 4.13 The TA demonstrates how the development will secure improvements to the to the existing footpath and cycle way networks in and around the site to promote walking and cycling as alternative modes to the use of the private car.

Travel Plan

- 4.14 A Framework Travel Plan is submitted with the Bovis application. The Travel Plan identifies how new residents in particular will be encouraged to walk, cycle and take public transport as alternatives to using the private car.
- 4.15 The Travel Plan identifies that new residents will be provided with travel information including the availability of bus services, walking and cycling routes etc and will be encouraged to use these modes.
- 4.16 A Travel Plan Coordinator will be appointed to manage the Travel Plan. New residents will be provided with sustainable travel vouchers to use on sustainable travel modes such as the bus or, in the purchase of bicycles or cycling equipment.
- 4.17 The Travel Plan Coordinator will offer a personalised travel planning service for new residents.

Design

- 4.18 The Design and Access Statement details the process of designing the Bovis Site.
- 4.19 In accordance with the guidance in the NPPF careful assessment has been made of the topography of the site which provides opportunities to orientate new development in ways which offer opportunities for solar gain and thus a reduction in heating and energy demand.
- 4.20 The DAS also sets out how the education campus, local centre and community facilities have been located at the centre of the Site ensuring it is accessible to new residents existing communities.

- 4.21 The clustering of these key facilities, which can be high generators of trips and travel demand, offers the opportunity to reduce the number of trips and, by providing safe, attractive and accessible routes provides an opportunity for new residents to travel to these facilities on foot, cycling or by bus rather than using the private car.
- 4.22 The DAS highlights that the northern parts of the site adjoin the Alphington area which has a good range of existing local services and facilities which again offer the opportunity for new residents of this part of the Bovis Site to walk and cycle for their day to day shopping, social and educational needs without travelling by car.

Climate change and flood risk

- 4.23 The Environmental Statement, and the particular the Flood Risk Assessment sets out that the vast majority of the Bovis Site lies within an area which is not subject to flood risk.
- 4.24 Those parts of the Site which are subject to flood risk, principally along with the Matford Book corridor are areas which are not planned to be built on.
- 4.25 The flood attenuation and drainage proposals planned for the Bovis Site take into account the effect of climate change and ensure that the new development and existing residents and other areas will not be subject to increased flood risk as a result of the development.

Energy Supply

- 4.26 The Adopted Local Plan sets out that the South West Exeter housing and mixed-use allocation provides the opportunity, together with proposals at Matford employment area, to deliver District Heating which can make use of energy derived from waste.

- 4.27 A District Heating Network could reduce energy demand and reduce carbon emissions and the overall carbon footprint of the development.
- 4.28 It is understood that an Energy Centre would be constructed at the Cattle Market site in Exeter City to deliver this energy supply.
- 4.29 Bovis will connect to the DHN if this can be achieved at an economically viable cost and within timescales which work with the implementation of the Bovis scheme. Discussions about the deliverability of the DHN will continue as part of the determination of the application.

Sustainable Drainage

- 4.30 In accordance with National guidance and the policies of the Adopted Local Plan and Development Framework the Bovis application sets out that the new development will make use of Sustainable Urban Drainage Systems (SUDS) to safely and effectively ensure disposal of surface water from the site.
- 4.31 The use of SUDS helps to mitigate the impact of potential flood risk and climate change arising from new development.
- 4.32 At Reserved Matters stage the design of individual buildings and residential properties will seek to ensure the use of water and rainwater harvesting so as to minimise the demand for water arising from the development

Construction

- 4.33 Bovis recognise that during the construction phase of development there are significant opportunities to make carbon reductions by sustainably sourcing materials and minimising the impact of construction traffic generation.

- 4.33 The Environmental Statement sets out that primary construction materials will include concrete, brick, steel post, beams and timber.
- 4.34 Where possible materials and resources used during the construction of development will be sourced from the local area a proportion of timber will be purchased from responsible forest sources.
- 4.35 In terms of material selection 'A' rated materials from the Building Research Establishment Green Guide to specification will be preferred.
- 4.36 The ES sets out that a Construction Traffic Management Plan will be implemented to ensure that HGV movements to and from the site in particular are minimised, and use the most environmentally effective route are used to minimise carbon emissions.
- 4.37 A Construction Environmental Management Plan will be implemented to ensure the responsible construction of the site, managing the it's environmental effects.
- 4.38 By the use of the various methods set out above, in delivering the Bovis part of the South West Exeter housing allocation, Bovis consider that they are making significant contribution to the Council's overall objective of reducing carbon emissions for the District for the future.

5 BOVIS HOMES

5.1 Bovis Homes is finding that buyers are becoming increasingly aware of the benefits of new homes: from energy efficiency that offers residents the opportunity to reduce their carbon dioxide emissions, to the sustainability of the materials used and the improved level of security a new home can offer over an older property.

5.2 As a respected national housebuilder Bovis Homes continues to assess the measures that it can take to help satisfy customers' needs, and reduce its own environmental impact. Bovis Homes' Corporate Social Responsibility policy prioritises:

- Improvement in the efficiency of resource utilisation in house building, and reducing waste;
- Designing products to improve the life-long operational efficiency of our homes; and
- The creation of sustainable living environments that enhance biodiversity and protect the environment

5.3 Bovis Homes were an early adopter of the 'Fabric First' approach to energy efficiency, designing homes to be highly efficient and concentrating first on reducing the demand for space heating and hot water heating. The Fabric First principle involves:

- Improvements in the fabric of walls, floors, roofs, windows, and doors;
- Installing higher levels of insulation materials in walls and loft spaces;
- Enhancing the thermal performance of construction junctions to reduce heat loss and cold bridging;
- Improving permeability to control unnecessary heat loss; and
- Improving the efficiency and performance of ventilation systems.

5.4 Bovis considers that Fabric First is preferable to adding 'bolt-on' services (e.g. photovoltaic panels) for the following reasons:

- Any built-in fabric improvements last for the lifetime of the home;
- The approach is 'energy-blind', and therefore not subject to external influences such as changes in Government policies (e.g. feed-in tariff, the Renewable Heat Incentive) or fluctuations in energy pricing or availability;
- Homeowners do not have to interact with fabric improvements – they are technologically 'light' and require no maintenance; and
- It tackles the highest use of energy first: space heating.

5.5 These measures improve the performance of the home, reduce carbon dioxide emissions and, operated correctly, will last the lifetime of the home. This approach has helped Bovis to continue to improve the performance of the homes its design whilst achieving high sustainability standards.

5.6 In 2012, the average Bovis house type achieved an Energy Efficient Rating of (B) and an Environmental Impact Rating of (B), demonstrating both the high efficiency and low impact on the environment of Bovis schemes and homes. The UK average Energy Efficiency Rating is (E) whilst in England and Wales it is slightly higher at (D).

5.7 In respect of water conservation Bovis Homes also continues to work with sanitary ware and appliance manufacturers to specify highly efficient, low water-use appliances and fittings as part of the ongoing drive to reduce water consumption. Low-flush WCs and restricted-flow baths and basin taps are now commonly specified in Bovis homes.

- 5.8 As a leading national house builder, Bovis look to source many materials from within the UK. Local bricks, blocks, concrete floor beams, plasterboard and other heavyside materials are selected from partners with plants within England and Wales. As well as helping to support the UK's economy, this policy reduces costs and CO2 emissions from transport.
- 5.9 Bovis Homes have an enviable reputation for a strong and healthy relationship with our supply chain. Many of our partnerships are long-standing, and based on solus agreements, which allows us to specify and source materials and products that we know have a low environmental impact and are responsibly sourced.
- 5.10 Bovis Homes requires all timber material suppliers to be accredited either by the Forest Stewardship Council (FSC) or The Programme for the Endorsement of Forest Certification (PEFC), both of whom promote sustainable forestry management, and to be purchased from sustainable and authorised sources.