

From: [REDACTED]
To: [SheffieldPlan](#)
Subject: Local Plan representation | Olivia Blake MP
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Attachments: [OB Local Plan representation.docx](#)

To whom it may concern,
Please find attached my representation to the Local Plan.
Kind regards,
Olivia Blake

Member of Parliament for Sheffield Hallam

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In 2019, the Tyndall Centre for Climate Change Research—which had been working in conjunction with Sheffield City Council’s Green Partnership Board—released a report which included carbon budget for the city. This report recommended that the city must not exceed a budget of 16 million tonnes of carbon emissions before 2038, and that, at the current rates, Sheffield will use its entire budget in less than six years. At the time of the report’s release, the Council iterated its support for the independent Tyndall report and [restated its ambition](#) to become zero carbon by 2030.

In a further report released in 2022, entitled ‘[Setting Climate Commitments for Sheffield](#)’, researchers from the Tyndall Centre set out a periodic carbon budget for Sheffield, with recommended budgets for maximum cumulative CO₂ emissions for Sheffield to meet the 2015 Paris Agreement. Those target budgets are repeated below:

Carbon Budget Period	Recommended Carbon Budget (Mt CO₂)
2018 – 2022	9.3
2023 – 2027	4.9
2028 – 2032	2.6
2033 – 2037	1.3
2038 – 2042	0.7
2043 – 2047	0.4
2048 – 2100	0,4

As can be seen from the figures above, the five-year period commencing in 2023 would require a 47.31 per cent reduction in CO₂ usage than the preceding five year period; and the period commencing 2028 a further 46.93 per cent reduction.

The 2022 Tyndall report recommended that Sheffield needs to achieve average CO₂ mitigation rates of -12.3 per cent per year from 2020 onwards in order to stay within its recommended carbon budget, and suggests that otherwise, Sheffield would exceed its recommend carbon budget by 2027.

The Planning and Compulsory Purchase (Act 2004), as amended, states that the purpose of the examination of a Local Plan is to test whether the plan is sound; that is, whether the plan is **positively prepared, justified, effective, and consistent with national policy**.

I am concerned regarding the soundness of the plan as prepared on the basis of its justification, effectiveness, and whether it will meet the carbon reduction aims set out in the Tyndall report.

The plan’s *Development Management Policies and Implementation* documentation set out policies that aim to tackle the climate emergency by guiding how developments will take place.

Policy ES1 sets out measures to reduce carbon emissions in new developments until 2038, which covers the period in which Sheffield City Council wishes to become carbon net zero.

We are told that the Plan will introduce ‘new standards that will ensure that new development in the city receiving planning permission from 2030 onwards are net-zero

carbon', setting out that new buildings will need to be designed to deliver higher levels of energy efficiency. Similarly, we are told that from 1 January 2030 new developments in Sheffield will either need to generate their own renewable energy onsite or connect to a renewable energy network such as the District Energy Network.

To be clear, these measures—and the housing standards proposed—are indeed welcome. However, the timeline proposed gives cause for concern. The proposed strategy means that the city's housing developments would become net zero compliant by 2030 by instituting most of its measures after 2030. I am thereby concerned by the appropriateness and effectiveness of this plan in that it plans for non-compliance to the Council's own sustainability targets.

It is well established that housing is one of the largest drivers of greenhouse gas (GHG) emissions in the UK: [19.9% of emissions](#) arise directly from the residential sector, and more arise come from their gas and electricity supply (energy supply accounting for 23.6% of all emissions in the UK).

While I understand that, under the proposed Plan, new dwellings and non-residential buildings will be expected to reduce their regulated carbon emissions by at least 75% from 1 January 2025, I believe that a Local Plan which institutionalises non-compliance with the city's carbon net-zero target is inappropriate.

There are reasonable alternatives available:

Passivhaus buildings are optimised for net-zero, aiming to minimise whole-life carbon. The passivhaus design methodology encourages the optimisation of embodied carbon through efficient use of materials and radically reducing the heat and cooling plant.

Rather than require a stopgap step—the reduction of emissions by 75% from 2025—Sheffield's new Local Plan should require new developments to be built to passivhaus or equivalent standard as soon as is practicable to ensure maximum emissions reductions over a longer period.

As examples:

- The Scottish Government has [confirmed its intention](#) to introduce legislation requiring all new homes in Scotland to be built to passivhaus standard, and plans to implement the new standards within two years.
- Camden Council's planning policy (Policy CC2, part F) actively encourages residential development to meet the passivhaus standard and/or Housing Quality Mark; and CC2 part G expects residential conversions/extensions of 500sqm floor-space or above five or more dwellings to achieve "excellent" in BREEAM domestic refurbishment.
- Eastleigh Borough Council's Local Plan (Policy DM2 and DM3) require all larger developments, above 150 dwellings or 10,000 sqm of floor space, to address

sustainable development issues at the masterplan stage through BREEAM Communities 'excellent' certification and fund post-occupancy studies.

- Leeds City Council has, since 2013, required commercial developments of 1,000 or more square metres (including conversions) to meet the BREEAM standard of 'excellent' where feasible
- Norwich City Council has adopted policy requiring their new Council Housing to be built to passivhaus standard; and Exeter City Council requires all new homes built by the council to achieve passivhaus

I believe it would be justified for Sheffield to follow the best practice above and set ambitious for exemplary housing standards that would enable the city to meet its emissions targets.

From the commencement of the Local Plan, the following should apply:

Domestic New Build

All developments should be required to achieve certification with the passivhaus standard or AECB Building Standard, and where appropriate all developments should be encouraged to adopt the Home Quality Mark.

Non-domestic and Multi-residential New Build

Non-domestic and multi-residential new buildings should achieve either passivhaus certification, or BREEAM 'excellent' certification, or BREEAM 'very good' plus AECB Building Standard certification. All larger non-domestic and multi-residential (above 150 dwellings or 10,000 sqm of floor space) must address sustainable development issues through Passivhaus standard, Home Quality Mark, or BREEAM 'excellent' certification, or BREEAM 'Very Good' plus AECB Building Standard certification; and fund post occupancy evaluation studies.

Refurbishment and Retrofit (Domestic, Multi-residential and Non-domestic)

Domestic refurbishments should achieve a Passivhaus EnerPHit Standard certification, AECB Building Standard certification or a BREEAM 'Domestic Refurbishment' rating of 'Very Good'.

Non-domestic and multi-residential refurbishments of $\geq 500\text{m}^2$ floor area must achieve either Passivhaus EnerPHit certification, AECB Building Standard or BREEAM 'Excellent' certification.

Without an increase to the standard of building required in the Local Plan, and an earlier requirement for developers to built or retrofit to this standard, it would not meet the carbon reduction aims set out in the Tyndall report. On this basis I do not believe the Plan can be considered sound.

Kind regards,

Olivia Blake MP