

CID 1258
RN 2217-9

Ref. 62



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11 May 2010

BY EMAIL

Dear Mr Motuel,

**SOUTH BUCKS LOCAL DEVELOPMENT FRAMEWORK: PROPOSED
SUBMISSION CORE STRATEGY**

Thank you for the opportunity to comment on the South Bucks Proposed Submission Core Strategy document. We have reviewed the document against the South East Plan (May 2009) and although it is ultimately the responsibility of the Planning Inspectorate to determine whether the Core Strategy is in general conformity with the South East Plan, we are of the view that the Core Strategy is in general conformity with the South East Plan.

We also wish to make a number of other representations on the document, which are outlined in the attached schedule. These additional comments indicate how it is considered the DPD should expand upon guidance in the South East Plan and take forward the regional context. We do not consider it necessary to participate at the oral examination.

I trust that the above is of assistance. I

South East England Partnership Board representations to the South Bucks Local Development Framework: Proposed Submission Core Strategy

Representation 1: Spatial Strategy

The 'Maintaining Local Economic Prosperity' section of the spatial strategy could usefully refer to the definition of Smart Growth as set out in Policy RE5 of the South East Plan and set out what achieving Smart Growth in the district requires in terms of the six key principles: employment; enterprise; innovation and creativity; skills; competition; and investment in infrastructure, including transport and physical development.

Representation 2: Housing Density

Policy Core Strategy 8 seeks an average density of no less than 30 dwellings per hectare. Although the policy acknowledges actual densities may be higher or lower than this, we would welcome the average density sought to align with the overall regional target of 40 dwellings per hectare over the Plan period as set out within Policy H5 of the South East Plan.

Representation 3: Sustainable Energy

The Government's approach to delivering zero carbon buildings means that the on site renewables policy in the South East Plan (Policy NRM11) has been superseded. The definition proposes a hierarchy approach prioritising energy efficiency followed by on-site followed by off-site generation of renewable energy, as the means of reducing carbon emissions. Reducing the demand for energy from new buildings represents the most sustainable and cost effective option for delivering zero carbon homes and up to level 3 of the CSH for energy and carbon dioxide emissions can be achieved through building fabric improvements. It is important that measures should be taken to maximise energy efficiency of new dwellings first before delivery of a percentage of energy from on site renewables (see fig 5, page 19 of the climate change guide www.southeast-ra.gov.uk/documents/regional_planning/ldf/climate_change/Climate_Change_LDF_guide_Main_Content.pdf). Therefore, we support a policy approach that sets standards according to the CSH that reflects this. If local circumstances warrant it, then higher levels of the code can be specified on strategic sites if there are opportunities to deliver on site renewable energy generation.

The definition of zero carbon homes also proposes offsetting of carbon emissions from new development via allowable solutions. Consideration should be given to the allowable solutions that will be appropriate in South Bucks, which may include maximising on-site renewable energy generation, connection to CHP networks, off-site generation and contribution to an offset fund to provide clarity for developers. There should be a target for CO₂ emissions reduction set out in policy to help deliver Policy CC2 of the South East Plan.