

## Climate Change and Sustainability – Frequently Asked Questions

The following 'Frequently Asked Questions' relate to policies BCS13-BCS16 of the adopted Bristol Core Strategy (June 2011). They should be read in conjunction with the Core Strategy and the Climate Change and Sustainability Practice Note, both published separately and available via the council's web site<sup>1</sup>.

### **Could my application be exempt from the requirement for a sustainability statement or energy strategy?**

The requirement for a sustainability statement and energy strategy only applies to applications for planning permission. It does not apply to applications for listed building consent, conservation area consent, advertisement consent, certificates of lawfulness, prior notifications under the General Permitted Development Order or applications under any other consent regime.

Section 2.3 of the Practice Note also offers exemptions for certain kinds of planning application. This includes applications proposing a "change of use" only. However, applications for changes of use are only exempt if they involve no increase in floorspace or subdivision of units. For example, an application that sought only to change the use of a retail unit from a shop to a building society would be exempt, but the conversion of a house to two flats or the conversion of an office block to multiple units of student housing would not be exempt and a sustainability statement and energy strategy would be required.

### **I'm only proposing a small change to an existing building. Do I really have to submit a detailed sustainability statement and energy strategy?**

Policy BCS13 of the Core Strategy states that sustainability statements should be "proportionate to the scale of development proposed". Some form of sustainability statement will usually be required to accompany your planning application, but the requirements for, for example, a small extension to an existing business premises will be very different from the requirements for a proposal for one or more new dwellings.

Section 2.4 of the Practice Note provides further guidance on how sustainability statements can be proportionate to the scale of development proposed. In some cases, the proposal may be exempt for the requirement to produce a sustainability statement as set out in section 2.3.

### **Why are you focusing on renewables rather than energy efficiency?**

Policy BCS14 of the Core Strategy requires a 20% reduction in emissions through the use of renewables. However, development is first expected to minimise its energy requirements through the use of energy efficiency measures. Both energy efficiency and renewables are therefore very important. Section 3.1 of the Practice Note provides further guidance on how to respond to these requirements in your energy strategy.

### **How do you define "renewables"?**

Section 3.2 of the Practice Note defines which technologies we consider to be "renewables" and which we would instead treat as energy efficiency measures.

---

<sup>1</sup> <http://www.bristol.gov.uk/planningpolicy>

**Why can't we deal with renewables and energy efficiency at a later stage, after planning permission has been granted?**

To be effective, energy efficiency measures and renewables have to be planned into development from the earliest stage, as they directly affect the layout and design of development. For example, to make the best use of solar power, a development will require south-facing roof slopes. Unfortunately, as set out in Section 2.2 of the Practice Note, it is therefore impossible to delay considering the issues until after planning permission has been granted.

**Why are you asking us to undertake SAP or SBEM calculations at the planning stage?**

In order to know how much renewable energy provision is required to achieve a 20% reduction in emissions, the council must first have an estimate of what the emissions of a development are likely to be.

Until benchmark data becomes available that provides a reliable estimate for what the regulated emissions of different development types are likely to be, SAP and SBEM calculations will remain the only reliable way of providing this estimate.