Bath and North East Somerset Council

Local Plan 2025 – 2043

Pre-Submission Draft Local Plan (Reg 19)

September 2026

Climate Change Topic Paper

Bath & North East Somerset Council

Improving People's Lives

Contents

1. Introduction

1.1 Bath and North East Somerset (B&NES) Council declared a Climate Emergency in 2019 and committed to providing leadership to enable the district to achieve net zero carbon emissions by 2030. Achieving a net zero and climate-resilient district will require significant changes across the built environment, transport systems and energy infrastructure. The Council's Climate Emergency response is underpinned by three key priorities:

- Improving the energy efficiency of existing buildings and ensuring that new development is designed and constructed to achieve net zero carbon standards;

- Facilitating a substantial shift towards public transport, walking and cycling to reduce transport-related emissions; and

- Supporting a rapid and large-scale increase in the generation of renewable and low-carbon energy.

1.2 The planning system has an important role in helping to deliver these objectives. Through the Local Plan, the Council can influence the location, design and performance of development to reduce carbon emissions, support renewable energy generation, improve resource efficiency and ensure that communities are resilient to the impacts of a changing climate.

Purpose of this Topic Paper

1.3 This Topic Paper has been prepared to support the Local Plan Regulation 19 consultation and sets out the justification for the Council's proposed climate change policies (Policies 6.2, 6.3 and 6.5). The policies have been developed through the Local Plan review process and are intended to support the Council's ambition of delivering a net zero carbon and climate-resilient district.

1.4 This paper summarises the policy context and evidence base that have informed the development of the proposed policies and provides a justification for each policy proposed.

2. The built environment and climate emergency background

2.1 Addressing climate change is a central objective of national planning policy and a key consideration in the preparation of the B&NES Local Plan. The planning system has an important role in supporting the transition to a net zero and climate-resilient future by influencing the location, design, construction and operation of development. Through the Local Plan, development can contribute to reducing greenhouse gas emissions, supporting renewable and low-carbon energy generation, improving resource efficiency and strengthening resilience to the impacts of climate change.

2.2 The scientific and policy case for urgent climate action remains clear. The Intergovernmental Panel on Climate Change (IPCC) has concluded that rapid, deep and sustained reductions in greenhouse gas emissions are required to limit global warming and avoid the most severe impacts of climate change. At the same time, climate change is already affecting the UK and future climatic changes are unavoidable. UK Climate Projections (UKCP18) indicate that the UK is likely to experience hotter, drier summers, warmer, wetter winters and an increased frequency of extreme weather events, including heatwaves and intense rainfall.

2.3 The UK has established a legally binding framework for climate action through the Climate Change Act 2008, as amended in 2019, which commits the UK to achieving net zero greenhouse gas emissions by 2050 and requires progress through a series of statutory carbon budgets. In addition, the UK's Nationally Determined Contribution under the Paris

Agreement commits to reducing greenhouse gas emissions by at least 81% by 2035 compared with 1990 levels.

2.4 The built environment is central to achieving these objectives. Emissions arise throughout the lifecycle of development, including the extraction and manufacture of construction materials, construction activities, building operation, maintenance, refurbishment and eventual demolition. At the same time, the built environment provides the homes, workplaces, infrastructure and community facilities necessary to support sustainable growth and prosperity. A key challenge for plan-making is therefore to ensure that development needs are met in a manner that minimises carbon emissions, promotes efficient use of resources and enhances resilience to future climate change impacts.

2.5 Recent national emissions statistics demonstrate the continuing importance of considering the built environment in achieving climate objectives. In 2025, the buildings and product uses sector remained the UK's second largest source of greenhouse gas emissions. Although emissions from the sector have fallen since 1990, they remain strongly linked to the energy performance of buildings and the energy demand for heating and cooling. This highlights the critical role of planning in supporting highly energy-efficient, low-carbon and climate-resilient development, while also addressing emissions associated with the construction, operation and adaptation of buildings over their lifetime.

The Climate Emergency and BANES

2.6 The IPCC, the United Nations body responsible for evidence on climate change, The Met Office's UK Climate Projections (UKCP18) and the UK Climate Change Risk Assessment (CCRA) produce regular scientific assessment reports that provide the principal evidence base for understanding climate risks, options for mitigation and adaptation and inform policy responses.

2.7 For B&NES, and the wider South West area, the UKCP18 and the CCRA indicate that the region is likely to experience warmer temperatures throughout the year, hotter and drier summers, warmer and wetter winters, and more intense heatwaves and heavy rainfall events. The hotter and drier summers are expected to be particularly pronounced in the southern areas of the UK, increasing pressures on water resources, while more intense rainfall events are likely to increase flood risk and place additional strain on infrastructure. These projected changes are expected to increase the risk of overheating in buildings, water scarcity, flooding, biodiversity loss and disruption to communities and services across the district.

3. B&NES Policy

Current Policy Position

3.1 B&NES Council's adopted Development Plan currently comprises:

- The Core Strategy (2014)
- The Placemaking Plan (2017)
- The Local Plan Partial Update (2023)

The Development Plan is supported by a range of Supplementary Planning Documents and Guidance

3.2 The adopted Development Plan includes several policies which seek to address climate change mitigation and environmental sustainability:

- **CP1: Retrofitting Existing Buildings**. This policy supports the sensitive retrofit of existing buildings to improve energy efficiency and reduce carbon emissions while respecting heritage significance and local character.
- **SCR6: Sustainable Construction for New Build Residential Development.** This policy requires new residential development to minimise energy demand, achieve high standards of energy efficiency and deliver net zero operational emissions by setting energy use, space heating demand and renewable energy generation targets.
- **SCR7: Sustainable Construction for Major New Build Non-Residential Development.** This policy sets carbon reduction requirements for new major non-residential development, helping to

reduce operational carbon emissions from commercial and other non-residential buildings.

- **SCR8: Embodied Carbon.** This policy requires the assessment and reduction of embodied carbon emissions associated with the substructure, superstructure and finishes of large scale new-build developments.
- **CP3: Renewable Energy.** This policy sets local planning guidelines and targets for renewable electricity generation.
- **SCR5: Water Efficiency.** This policy requires all residential development to achieve specified water efficiency standards for appliances installed.
- **CP4: District Heating.** This policy identifies district heating priority areas within the district and requires development to connect to existing systems where this is available.

Proposed Policy Approach

3.3 BANES Council recognises Climate Change as one of the most significant and critical long-term challenges facing the district and is committed to advancing local climate change adaptation and mitigation objectives, supporting the national transition to net zero by 2050, while also strengthening resilience among local communities to current and future climate change related impacts. To support this the Council adopted its Climate Change Strategy in July 2019, setting out an ambitious aspiration for B&NES to be net zero by 2030.

3.4 It is proposed to introduce new policies and to update some existing policies to address several aspects of the climate emergency and to assist in achieving the districts net zero aspiration. The policies relevant to this topic paper are:

- 6.2 Climate Adaptation and Resilience
- 6.3 New Build Non-Residential Development
- 6.5 Retrofit First

3.5 The policy suite, including the proposed new policies and the existing saved policies, provide a comprehensive approach to mitigating and adapting to climate change, taking account of operational and embodied carbon, adaptation to a changing climate and its associated risks and the

need for renewable energy generation and energy efficiency improvements across the district.

4. Legal and Policy Context

National Policy background

4.1 The planning system has a critical role in supporting the transition to a low carbon future whilst ensuring communities, infrastructure and the natural environment are resilient to the impacts of a changing climate. National legislation establishes a clear framework for local planning authorities to address both climate change mitigation and adaptation through local plans.

The Climate Change Act

4.2 The Climate Change Act 2008 provides the statutory framework for addressing climate change in the UK, establishing legally binding carbon reduction targets and requirements for climate change adaptation. The Act places climate change at the centre of public policy and provides the legislative basis for local planning authorities to consider both emissions reduction and climate resilience in plan-making. Accordingly, the Local Plan has an important role in supporting the delivery of national climate objectives and ensuring that development responds effectively to the challenges of a changing climate.

The National Planning Policy Framework

4.3 All development plans must be prepared within the context of the Government's planning policies. These are primarily set out within the National Planning Policy Framework (NPPF) which establishes the Government's planning policies for England and how these should be applied. The NPPF provides the framework within which locally prepared plans for development can be produced.

4.4 Although a revised NPPF came into effect on 17 August 2026, B&NES Local Plan 2025-2043 is being prepared under the transitional arrangements and will therefore be examined against the December 2024 NPPF, as amended in February 2025. Consequently, the assessment of climate policies and the justification set out in this paper are undertaken primarily against the requirements of that version of national policy.

4.5 The NPPF places climate change at the heart of sustainable development and confirms the important role of the planning system in supporting the UK's transition to a low carbon, climate resilient future. The NPPF requires local planning authorities to take a proactive approach to both climate change mitigation and adaptation, ensuring that development contributes to reducing greenhouse gas emissions while responding effectively to current and future climate risks. It expects plans to shape places in ways that support the transition to net zero greenhouse gas emissions by 2050, reduce energy demand, support renewable and low-carbon energy generation, encourage the efficient use and reuse of resources, and improve the resilience of communities and infrastructure.

4.6 The NPPF also requires local plans to address a range of climate-related risks, including flooding, overheating, water scarcity, drought and extreme weather events. Development should incorporate sustainable drainage systems where appropriate, and support nature-based solutions such as green infrastructure and natural flood management. Collectively, these requirements ensure that climate considerations are embedded throughout plan-making and decision-taking, helping to deliver development that is both low carbon and resilient to the impacts of a changing climate.

National Planning Practice Guidance

4.7 National Planning Practice Guidance (PPG) provides detailed support for the implementation of national planning policy. The guidance states that effective spatial planning is an important part of responding to climate

change because it influences greenhouse gas emissions and can improve resilience to climate impacts through the location, design and form of development. The PPG highlights the need for local plans to include proactive strategies for mitigating and adapting to climate change in line with the objectives and provisions of the Climate Change Act 2008.

4.8 The guidance also identifies a range of measures that local planning authorities can consider through plan-making, including energy efficiency, renewable and low-carbon energy generation, green infrastructure, flood risk management and adaptation measures which address future climate risks.

Planning and Energy Act 2008

4.9 The Planning and Energy Act 2008 provides an important legislative basis for local planning authorities to address climate change through the planning system. The Act enables local plans to include policies requiring a proportion of a development's energy to be generated from renewable or low carbon sources and allows authorities to set energy efficiency standards that exceed the minimum requirements of the Building Regulations.

4.10 The Act is particularly significant in providing the statutory basis for locally derived energy and carbon reduction policies, enabling councils to respond to local climate objectives and evidence while contributing to national net zero ambitions. Alongside the Climate Change Act 2008 and the National Planning Policy Framework, it supports the integration of energy efficiency, renewable energy generation and carbon reduction measures within local plans.

Future Homes Standard

4.11 On 24 March 2026, MHCLG published the Future Homes Standard (FHS), the next revision to Part L of the Building Regulations in England.

The FHS set out new energy efficiency standards for new housing, putting it on a trajectory towards net zero carbon through electricity grid decarbonisation and through having some on-site solar PV in most developments. These standards will come into force on 24 March 2027 followed by a 12-month period of transitional arrangements for non-higher risk building work.

Local Policy Background

Climate Emergency Strategy and Action Plan

4.12 In March 2019, B&NES Council declared a climate emergency and committed to achieving net zero across the district. The declaration recognised the significant risks that climate change poses to communities, infrastructure, ecosystems and the local economy. Whilst reducing greenhouse gas emissions remains essential, the Council also recognises that some degree of climate change is already unavoidable and that communities and development must become more resilient to future climate impacts.

4.13 The strategy identifies tackling the Climate and Ecological Emergencies and preparing for the future as key priorities. The strategy recognises that climate change affects a wide range of Council objectives, including public health, housing, infrastructure, biodiversity, water management and economic resilience.

West of England Climate and Ecological Strategy and Action Plan

4.14 The West of England Climate and Ecological Strategy and Action Plan 2023 provides the overarching regional framework for addressing the climate and ecological emergencies across B&NES, Bristol and South Gloucestershire. The strategy sets an ambition for the West of England to become a net zero carbon region and support nature recovery by 2030 and identifies climate resilience as a core priority alongside net zero energy, sustainable buildings and places, transport and nature recovery. It

recognises the need to increase the energy performance and resilience of buildings, reduce reliance on fossil fuels, expand green infrastructure, support nature-based solutions and prepare communities for the impacts of climate change. The strategy emphasises that adaptation and resilience must be integrated into decisions on growth, infrastructure and development to ensure the region remains resilient to increasing risks from extreme heat, flooding, water stress and biodiversity loss.

5. Climate Evidence Base

UK Net Zero Carbon Buildings Standard

5.1 The UK Net Zero Carbon Buildings Standard is an industry led framework that establishes consistent methodologies and performance targets for assessing and verifying net zero carbon buildings across a range of buildings type. The Standard adopts a performance-based approach, setting limits for operational energy demand, operational carbon emissions and whole-life carbon impacts, and is intended to provide a nationally recognised route for delivering buildings aligned with the UK's net zero objectives. The Standard translates national climate ambitions into measurable building performance outcomes and reflects emerging best practice across the development sector.

Climate Change Committee: A Well-Adapted UK (CCRA4-IA)

5.2 The Climate Change Committee's 'A Well-Adapted UK: The Fourth Independent Assessment of UK Climate Risk' (CCRA4-IA) provides the most up to date national assessment of climate risks facing the UK and the actions required to improve resilience. The report concludes that climate risks from extreme heat, flooding, drought, water scarcity, infrastructure disruption and ecosystem degradation are increasing, and that adaptation is not currently keeping pace with the scale of future challenges. It emphasises the importance of avoiding the lock-in of future climate vulnerability through decisions made today, particularly in relation to buildings, infrastructure and land use.

Climate Change Committee: Progress in reducing emissions

5.3 The Climate Change Committee's ‘Progress in Reducing Emissions 2026’ Report to Parliament provides an independent assessment of the UK's progress towards meeting its statutory carbon budgets and net zero target under the Climate Change Act. The report evaluates emissions trends across all sectors of the economy and identifies the scale and pace of action required to achieve future carbon reduction pathways. It highlights the critical role of the built environment in delivering net zero, emphasising the need for substantial improvements in energy efficiency, accelerated building retrofit, decarbonisation of heating systems and reductions in whole-life carbon emissions from construction.

Climate Change Committee: Progress in adapting to climate change

5.4 The Climate Change Committee’s ‘Progress in Adapting to Climate Change 2025’ report provides an independent assessment of the UK's preparedness for the impacts of climate change and the effectiveness of current adaptation measures. The report concludes that progress in adapting to climate change remains insufficient in many sectors and highlights increasing risks from overheating, flooding, water scarcity, infrastructure disruption and impacts on health and the natural environment. It emphasises the need to embed climate resilience into decisions being made today to avoid locking in future vulnerability and costly retrofit.

LETI Climate Emergency Design Guide

5.5 The LETI Climate Emergency Design Guide is one of the most prominent resources for delivering net zero buildings and translating climate science into practical design standards for the built environment. Prepared by the London Energy Transformation Initiative (LETI), the guide sets out evidence-based targets and design principles covering operational energy, Energy Use Intensity (EUI), embodied carbon, overheating risk, retrofit, renewable energy and heat decarbonisation. It advocates a fabric-first

approach that minimises energy demand before considering energy generation and promotes the reuse and retrofit of existing buildings as a key strategy for reducing whole-life carbon emissions.

6. Proposed Policies

6.1 Policies 6.2, 6.3 and 6.5 set out requirements for energy efficiency, renewable energy, climate resilient design, embodied carbon and circular economy principles and each policy is designed to consider both climate change mitigation and adaptation, ensuring compliance with national guidance and local evidence. Each policy is justified by local evidence of risk, national legal duties, and the need to ensure sustainable, resilient growth.

Policy 6.2: Climate Adaptation and Resilience

Proposed policy Approach

6.2 The Council considers that a comprehensive climate adaptation policy is necessary to ensure development remains resilient to the unavoidable impacts of climate change over its lifetime. Evidence indicates that B&NES is likely to experience hotter, drier summers, warmer and wetter winters, more frequent heatwaves, increased flood risk, drought, water scarcity and more extreme weather events. These changes present risks to communities, buildings, infrastructure, ecosystems and public health.

6.3 Policy 6.2 seeks to embed climate adaptation and resilience into the design process from the earliest stages of development. The policy adopts a risk-based approach, requiring applicants to assess climate-related hazards and demonstrate how the design of development responds to current and future climate conditions. A Climate Risk Assessment will be required for all development, except householder applications, proportionate to the scale and nature of the proposal. This will ensure that

climate risks and opportunities are identified and addressed throughout the lifetime of the development and are considered from the outset.

6.4 The policy requires development to be designed to reduce vulnerability to climate hazards including overheating, flooding, intense rainfall, drought, water stress, wildfire and high winds. It places particular emphasis on protecting the health and wellbeing of present and future occupants, ensuring that development remains comfortable, safe and functional under future climate conditions. The policy also requires consideration of whether development could increase climate risks elsewhere, for example through increased flooding or urban heat island effects.

Justification

6.5 From considering successive UK Climate Change Risk Assessments, the independent advice of the Climate Change Committee, the National Adaptation Programme, alongside locally relevant evidence on flood risk, overheating, water resources and ecosystem resilience, it is evident that climate adaptation is now an essential component of sustainable development and that future climate impacts must be addressed through the planning system.

6.6 The CCRA4-IA concludes that climate risks are increasing in both magnitude and urgency across the UK. It identifies escalating risk to people, infrastructure, the economy and the natural environment from flooding, extreme heat, drought, water scarcity, wildfire and climate-related impacts on ecosystems. The assessment highlights that many climate risks are already occurring and that the window for effective adaptation is narrowing, necessitating earlier and more comprehensive action through policy and decision-making. These findings reinforce the need for development to be designed to function safely and comfortably under future climate conditions, rather than relying on historic climate data alone.

6.7 A particular concern identified by the Climate Change Committee (CCC) is the growing risk of overheating. The UK experienced temperatures exceeding 40°C for the first time in July 2022, demonstrating that extreme heat events previously considered unlikely are becoming increasingly probable. The CCC has highlighted that many homes and buildings continue to be constructed without adequate consideration of future overheating risks and that this could expose occupants to increasing health risks, reduced productivity and higher energy demand for cooling. Embedding passive design measures, shading, green infrastructure, building orientation and ventilation strategies into development at the outset is therefore recognised as a more effective and cost-efficient response than retrofitting solutions later.

6.8 The CCC has identified flooding as one of the highest priority areas requiring adaptation action. B&NES is expected to experience more intense rainfall events, rising winter precipitation and increasing storm severity all of which will result in greater pressure placed on drainage systems, watercourses and existing flood management infrastructure and will result in increased flooding across the district. The B&NES Local Flood Risk Management Strategy emphasises the importance of integrated approaches to managing this flood risk. Therefore, there is an identified need for new development to mitigate this risk, which the proposed policy seeks to address through the requirement of development to take all opportunities to be resilient to and not increase the risk of flooding for the lifetime of the development.

6.9 Water scarcity and drought are also identified as significant climate risks. Recent updates to national planning policy recognise water scarcity and drought as key climate change considerations, whilst the CCC has identified increasing pressures on water resources arising from population growth and changing weather patterns. The South West is projected to experience hotter, drier summers alongside increased seasonal variability in rainfall. This highlights the importance of ensuring that development

incorporates rainwater management measures, sustainable water use and landscape approaches that improve resilience to both flooding and drought conditions.

6.10 The NPPF explicitly requires the planning system to support the transition to net zero and requires plans to take a proactive approach to climate adaptation and to support measures that improve the future health and resilience of communities and infrastructure. Paragraph 162 states "*Policies should support appropriate measures to ensure the future health and resilience of communities and infrastructure to climate change impacts."* Policy 6.2 has been developed to respond directly to these requirements by ensuring that adaptation and resilience measures are incorporated into new development within the district.

6.11 Additionally, the Future Homes Standard which is intended to raise energy efficiency and operational carbon performance of new homes does not provide a response to climate adaptation. Issues such as resilience to extreme weather, flood risk, water scarcity, urban heat island effects, and wider adaptation measures are largely outside its scope. Therefore, relying solely on the Future Homes Standard and Building Regulations would leave development vulnerable to multiple climate risks and the impacts these risks cause.

6.12 Overall, the evidence demonstrates that future climate impacts are unavoidable and that the costs of responding to these impacts are significantly lower when resilience measures are integrated into development from the outset. Policy 6.2 is therefore justified as a proportionate and evidence-led response to the increasing risks identified through the UK Climate Change Risk Assessments, the advice of the CCC, national planning policy and local climate evidence. By requiring developments to address overheating, flood risk, water scarcity, biodiversity resilience and wider climate hazards, the policy seeks to

ensure that new development remains safe, healthy, efficient and adaptable throughout its lifetime.

Policy 6.3: New Build Non-Residential Development

Proposed Policy Approach

6.13 Policy 6.3 seeks to ensure that new non-residential development delivers net zero operational emissions by minimising energy demand, adopting low carbon heating and cooling systems and maximising on-site renewable energy generation. The policy adopts a performance based approach, using EUI and space heating demand targets rather than carbon emissions alone, reflecting the increasing decarbonisation of the electricity grid and the need to focus on actual building energy performance. The policy EUI targets are aligned with the Net Zero Carbon Buildings Standard targets as the Standard represents the most comprehensive and widely supported industry framework currently available.

6.14 The policy establishes a clear energy hierarchy requiring developments to first reduce energy demand through fabric-first design and energy efficiency measures, then meet remaining heating and cooling needs sustainably, maximise on-site renewable energy generation, and only use energy offsetting where net zero energy cannot be achieved on site. It also promotes climate-resilient building design by minimising overheating risks and reducing reliance on energy-intensive cooling systems, whilst supporting heat network connection and other renewable heating technologies. Together, these measures are intended to deliver highly energy-efficient, low-carbon buildings that contribute to the Council's climate emergency objectives and the transition to a net zero built environment.

Justification

6.15 Policy 6.3 is founded on the principle that reducing energy demand should be the primary objective of net zero building design. The policy adopts EUI and space heating demand targets as the principal performance metrics, reflecting emerging industry best practice and responding to the limitations of carbon-based compliance metrics as the electricity grid continues to decarbonise. As grid emissions reduce, carbon calculations alone can increasingly mask inefficient buildings with unnecessarily high energy demand. By contrast, EUI focuses directly on measured energy performance, providing a more robust and future-proof indicator of building efficiency.

6.16 The approach is supported by a substantial and growing evidence base. The LETI Climate Emergency Design Guide promotes operational energy targets and EUI-based performance standards that prioritise fabric efficiency, passive design and high-performance building envelopes. Similarly, the UK Net Zero Carbon Buildings Standard identifies operational energy demand as a critical component of delivering genuinely net zero buildings and provides nationally recognised benchmarks developed through collaboration across the built environment sector. Collectively, these standards are supported by organisations including LETI, RIBA, CIBSE, RICS, BRE, IStructE and UKGBC, demonstrating a strong industry consensus around the use of energy-based performance metrics. The proposed policy therefore reflects recognised best practice and aligns with the direction of travel of building performance standards across the UK.Net zero carbon standards.

6.17 The policy is also supported by national climate evidence. The Progress in Reducing Emissions 2026 Report to Parliament produced by the CCC concludes that the UK must significantly accelerate progress in reducing emissions from buildings if national carbon budgets and net zero commitments are to be achieved. The report highlights the importance of

reducing operational energy demand through higher building performance standards and improved energy efficiency.

6.18 A key strength of the proposed approach is its focus on measurable operational outcomes. Evidence from across the sector demonstrates a persistent performance gap between predicted and actual building energy use. Compliance routes based solely on Building Regulations modelling do not guarantee efficient real-world performance once a building is occupied. EUI and space heating demand targets provide clearer design outcomes and encourage development that performs as intended in operation, supporting a transition towards genuinely net zero buildings.

6.19 While the forthcoming FHS represents a significant improvement in national energy performance requirements, it will not require buildings to achieve net zero operational emissions. Instead, it focuses on eliminating fossil fuel heating and improving energy efficiency so that buildings become effectively net zero in use as the electricity grid decarbonises further. Policy 6.3 aligns with this direction of travel through support for low-carbon heating technologies and application of the energy hierarchy but goes further by requiring development to minimise operational energy demand and achieve net zero operational emissions.

6.20 The Council has also had regard to the Planning: Local Energy Efficiency Standards Update Written Ministerial Statement published December 2023, which states that Government does not expect plan-makers to set local energy efficiency standards that exceed current or planned Building Regulations. In considering the statement, the Council notes open legal advice prepared by Estelle Dehon KC which concludes that local planning authorities retain the ability to set locally justified planning policies requiring higher building fabric and energy performance standards than those contained within Building Regulations. The advice further concludes that the Written Ministerial Statement does not remove the statutory basis for locally derived climate mitigation policies nor

prevent the use of operational energy performance metrics such as Energy Use Intensity (EUI). This position is supported by the extensive technical, financial and legal evidence assembled through the Essex Design Guide which demonstrates that operational energy targets can be delivered in a viable and consistent manner and provide a more effective route to reducing actual energy demand than carbon-based compliance metrics alone.

6.21 The proposed space heating demand target is consistent with recommendations from the Climate Change Committee, which identified heating demand levels of approximately 15 to 20 kWh/m²/year as necessary for new homes to support the UK's net zero pathway. Similar performance metrics are widely promoted by leading industry bodies and increasingly incorporated into local planning policies across the country. Furthermore, modelling undertaken for the West of England Combined Authority and constituent local authorities demonstrated that achieving a 15 kWh/m²/year space heating target for common non-residential building types such as offices and schools could be delivered with relatively modest cost uplifts. This modelling is published as part of the evidence base supporting the Local Plan. The cost uplift form Part L 2021 due to energy efficiency improvements, which included the building fabric specification needed to meet this, was between 0.9% and 2.8%. This cost uplift has been considered and included in the Local Plan Viability Assessment, which is published as part of the evidence base.

6.22 The policy also aligns with the objectives of the NPPF, which supports the transition to a low-carbon future, seeks to mitigate and adapt to climate change, and encourages local planning authorities to shape places in ways that contribute to radical reductions in greenhouse gas emissions. By adopting energy performance metrics that drive reductions in energy demand, Policy 6.3 provides a clear, evidence-based and technically robust framework for delivering high-performing non-residential buildings that are consistent with national policy, industry best practice

and the Council's wider climate ambitions. It also ensures consistency with the operational energy approach already embedded within the proposed residential net zero policies, providing a coherent framework for all new development across B&NES.

Policy 6.5: Retrofit First

Proposed Policy Approach

6.23 A linear economy is based on extracting materials, creating products, and then disposing of them as waste after use. The linear model is focussed on the product, with waste being generated throughout the production process. Linear economies contribute to the climate crisis by depleting primary resources and generating large amounts of material wastage, pollutant byproducts and greenhouse gas emissions. By contrast, circular economies prioritise minimisation of waste. When applied to the built environment, circular economies can include models for the repurposing of existing buildings wherever possible. It is this principle that the proposed policy 6.5 is based on.

6.24 The intention of policy 6.5 is to respond to the significant proportion of waste and carbon generated through the demolition and construction of buildings. The policy seeks to ensure that an appraisal exercise is undertaken to demonstrate what the outcomes may be if a building is proposed for total or substantial demolition. The policy encourages and promotes retention, refurbishment, and reuse of existing buildings through ensuring an appraisal exercise is undertaken to assist in understanding the carbon cost versus wider benefits that could be secured through retrofit, re-use or new build options.

Justification

6.25 The proposed Retrofit First policy responds to clear evidence that the built environment is a major contributor to climate change, with significant emissions arising not only from building operation but also from

demolition, construction and the production of building materials. This is particularly relevant in B&NES, where development frequently occurs on previously developed sites within Bath, creating pressure for redevelopment of existing buildings. Retaining, adapting and upgrading existing buildings can substantially reduce embodied carbon emissions, avoid unnecessary waste generation and make more efficient use of finite resources. The UK Green Building Council (UKGBC) identifies that construction, demolition and excavation account for around 60% of material use and waste generation in the UK, highlighting the importance of prioritising reuse over demolition wherever practicable.

6.26 The policy is strongly supported by national planning policy and climate evidence. The NPPF promotes sustainable development through the prudent use of natural resources, the minimisation of waste and pollution, and the reuse of existing resources, including existing buildings.

6.27 A Retrofit First approach also reflects established best practice across the planning system. Similar policies have been adopted and found sound through examination, including Policy 43 in the Westminster City Plan and Policy CC1 of the Camden Local Plan. These examples demonstrate that requiring applicants to consider the retention and adaptation of existing buildings before demolition is an effective and deliverable planning response to the climate emergency, particularly in areas with significant existing building stock and heritage assets.

6.28 Policy 6.5 will support the Council's climate objectives by reducing whole-life carbon emissions, minimising construction waste, encouraging the circular use of materials, and ensuring that the environmental value embedded within existing buildings is retained wherever possible. The policy therefore represents a proportionate, evidence-based and nationally consistent approach to securing more sustainable patterns of development.

7. Conclusion

7.1 Taken together, it is evident that achieving the UK's net zero ambitions and responding effectively to the climate emergency will require a significant contribution from local authorities. A key area of influence is the preparation of Local Plans and the management of development through the planning system. National legislation and planning policy provide a clear mandate for local action on climate change and support the development of locally specific policies that reduce greenhouse gas emissions, promote resource efficiency, support renewable and low-carbon energy, and improve resilience to future climate impacts.

7.2 The evidence presented in this Topic Paper demonstrates a clear and compelling justification for policies 6.2, 6.3 and 6.5. Drawing on national legislation, the CCC's evidence base, industry best practice and local climate evidence, the proposed policies provide a proportionate, deliverable and locally appropriate framework for addressing both climate change mitigation and adaptation. Collectively, they will help reduce operational and embodied carbon emissions, support the transition to a net zero built environment, encourage the efficient use of resources, and ensure that development remains resilient to the impacts of a changing climate throughout its lifetime. In doing so, the policies will support the delivery of the Council's climate objectives and help create sustainable, healthy and climate-resilient communities across B&NES.