



Quod

Matter 7

Climate Change, the
Environment and
Healthy Place

Ealing Local Plan

Statement prepared by
Quod on behalf of
Berkeley Homes

10TH JULY 2025

Matter 7: Climate Change, the Environment and Healthy Places

- 1.1 On behalf of Berkeley Homes, Quod submits a hearing statement in respect of Matter 7 (Climate Change, the Environment and Healthy Places). Technical analysis has been provided by Buro Happold .
- 1.2 Our hearing statement responds to EX16 Matters, Issues and Questions (MIQs) issued by the Inspectors on 8th April 2025, and the Council's response to IQ18 (EX3 and EX8). This submission is also cognisant of the Council's Minor Modifications (S24).
- 1.3 Berkeley Homes is the applicant for The Green Quarter, one of the borough's largest regeneration mixed use housing schemes comprising c.8,100 homes and c.17,400 sqm of commercial and community floorspace and extensive areas open space and public realm across the whole site (Phase 1-9). Our client received a resolution to grant planning permission for a revised masterplan (Phase 4-9) in November 2024 and is working towards engrossment of the legal agreement.
- 1.4 Our client submitted representations at Regulation 18 and 19 stage of the review and continues to be engaged at Regulation 22 stage (the 'Plan').

Issue – Whether the Plan is justified, effective and consistent with national policy and in general conformity with the London Plan in relation to climate change, the environment, and healthy places.

Q2 – Is Policy OEP consistent with the parameters set out in the Written Ministerial Statement on Energy Efficiency (December 2023) (the EEWMS) in terms of:

- 1.5 In accordance with paragraph 6 of the National Planning Policy Framework (NPPF), Written Ministerial Statements are a material consideration when preparing local plans.
- 1.6 The Government's Written Ministerial Statement is explicit in stating that plan-makers are not expected to introduce *"local energy efficiency standards for buildings that go beyond current or planned Building Regulations"* and that policies seeking to do so *"should be rejected at examination"* unless they are *"well-reasoned and robustly costed rationale"*, ensuring that *"development remains viable and the impact on housing supply and affordability"*.
- 1.7 Despite this clear direction from EEWMS, the Ealing Local Plan continues to propose local energy and sustainability standards through policy that exceed both Building Regulations and the London Plan requirements.
- 1.8 Policy OEP requires standards for both residential and non-residential development (over 500m²) that significantly exceed Building Regulations Part L1 and L2. These include targets for operational energy consumption, heating demand, bans on fossil fuels, carbon offsetting, and energy data submission, none of which are mandated by Building Regulations or the London Plan.

- 1.9 The operational energy targets set by Policy OEP and detailed at Tables DMP2 and DMP3 exceed the benchmarks set out by the UK Net Zero Carbon Buildings Standard (UKNZCBS), which are already set at levels representative of the top-performing 5% of buildings.
- 1.10 These targets are therefore extremely ambitious and delivery to these standards will be challenging for most development types, especially larger schemes, resulting in significant additional cost.
- 1.11 In quantifying the specific cost of Policy OEP, we have reviewed the eight development typologies identified within EB44¹ to which our analysis has focused on two residential typologies most applicable to Berkeley Homes, and specifically, The Green Quarter.
- 1.12 As set out in Table 1-1, achieving compliance with Policy OEP will introduce additional construction costs of up to c.£51/m² when compared against current London Plan standards.

Table 1-1: Estimated cost implications of Policy OEP

	Mid-rise	High-rise
Technical systems required to achieve current London Plan requirement (35% improvement over Part L)	Less efficient heat pump, good practice fabric & ventilation	
Cost uplift over Part L compliance	1.6%	1.1%
Technical systems required to achieve proposed policy OEP	Less efficient heat pump, ultra-low energy fabric & ventilation	
Cost uplift over Part L compliance	3.2%	1.9%
Baseline construction cost	£3,200/sqm	£3,400/sqm
Expected cost increase from London Plan to New local plan.	£51/sqm	£27/sqm

- 1.13 It is unclear whether this specific cost has been accounted for within the Whole Plan Viability Assessment (EB120), which instead applies a whole-plan view in assessing the 'net-zero carbon' viability, which it acknowledges a have a "*relatively significant*" impact.

***Net Zero Carbon:** the Council's emerging policy sets out an ambition for new development to be net carbon neutral by 2030. We have tested the impact this is likely to have on developments in the Borough and the residual land values will typically fall by 13% on average. The impact is therefore relatively significant in some cases, but the costs of technology required to achieve net zero carbon are expected to fall over time as research and development drives improvements. The cost impact of achieving both operational and embodied carbon are likely to be higher than operational only, with more significant impact on viability. However, given that the Council is not seeking to deliver net carbon zero until 2030, it is likely that costs will have fallen by that point and this will mitigate the impact on viability.*

¹ Figure 20.14

- 1.14 EB120 erroneously refers to the net-carbon neutral being applied from 2030, which is evidently not the case as the local standard set by Policy OEP will apply from adoption, stating clearly that *“New dwellings or 500 sqm or more of non-residential GIA should be designed and built to be Net Zero Carbon in operation”*.
- 1.15 We also note the position is predicated on the cost of technology falling over time. This is evidently unjustified and speculative.
- 1.16 Policy OEP(ii) refer to the Council’s offset fund based on residual energy (kWh) rather than emissions (kgCO₂), as applied by London Plan Policy SI2.
- 1.17 The Local Plan does not set out how this offset regime would operate in practice, nor does it provide details on the offset cost that would be applied to development.
- 1.18 Supporting evidence in EB36² indicates proposed offset rates of £100 per tonne CO₂ for residential development and £300 per tonne CO₂ for non-residential development. The rates exceed the £95 per tonne CO₂ adopted by the London Plan.
- 1.19 Should the Council propose to apply locally determined carbon offset rates that exceed the London Plan benchmark, this would introduce additional and untested costs to development viability across the Borough conflicting with the EEWMS. Clarification is requested from the Council on this matter.

Q3 – Are any modifications needed to Policy OEP for soundness?

- 1.20 The policy standards should be aligned to accord with London Plan standards endorsed by Policy SI2.
- 1.21 Further clarification should be provided as to whether the Local Plan seeks to adopted a bespoke offset fund.

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