

South East Plan EiP: Sub Matter 4B Other Housing Policies

Statement by Partnership for Urban South Hampshire (7138)

4B.1 Does draft RSS provide appropriate guidance on the type and size of new housing (Policy H6)?

1. The Partnership for Urban South Hampshire has no comment to make on this question at this stage.

4B.2 Does draft RSS provide appropriate guidance on densities in the light of recent Government guidance (Policy H5)? Will this provide the right type of housing.

2. The Partnership for Urban South Hampshire has no comment to make on this question at this stage.

4B.3 Does the strategy give a sufficiently strong steer to the adoption of higher sustainability standards in the region's housebuilding (Policies C4, EN1, NRM1)?

SUMMARY

3. No. The strategy does not provide a coherent strategic direction for sustainable housebuilding in the south east region. PUSH supports the aspiration within the South East Plan to deliver higher standards of sustainability in new development but would argue that the draft policies need to be more robust. The South East Plan is the region's statutory development plan, as such it is critically important that it provides policies which will ensure the delivery of sustainable communities over the next 20 years. The buildings and infrastructure in those communities will shape lives in the South East for the remainder of the century. The existing draft policies do not give a strong enough steer and are inconsistent in their approach to sustainable development. The draft policies referred to, (CC4, EN1 and NRM1) do not specifically **require** the achievement of measurable targets that are clear and can be readily applied on a consistent basis across the region. The policies need to be strengthened to provide measurable minimum requirements across the South East, which can be used to inform all Local Development Frameworks.

JUSTIFICATION FOR A STRONGER REGIONAL POLICY

4. National advice and best practice has moved on significantly since the drafting of the current regional policies and further national advice is expected on climate change in the near future. The regional policies need to be aligned to these changes and provide the flexibility to ensure that future changes can be accommodated. The changes that provide the justification for a stronger regional policy include:

- Extract from Yvette Cooper's letter encouraging uptake of a 'Merton' style policy, June 2006; *"The Minister expects all planning authorities to include policies in their development plans which require a percentage of energy in new developments to come from on-site renewables. Those authorities that have not yet taken steps to include such policies in their plans **should do so at the next available opportunity**. Amongst those authorities who already have such policies, many have chosen 10% as the requirement for energy to come from on-site renewables. However paragraph 8 of PPS 22 does not set a limit on the contribution that on-site renewables should make. In accordance with the importance which the government attaches to this policy, I am asked to urge your authority to follow the lead of some authorities and consider, where feasible, setting a higher, more challenging, percentage."*
 - PPS 25 Development and Flood Risk urging authorities to take a more robust approach to assessment of flood risks shortly to be revised and strengthened and referenced in the October 2006 Local Government White Paper¹
 - Emerging PPS 26 on Climate Change due to be published November 2006 and referenced in the October 2006 Local Government White Paper
 - The draft Code for Sustainable Homes which proposed minimum standards for water usage in new homes which are more demanding than the South East Plan's regionwide policies, to be launched by end 2006 and referenced in the October 2006 Local Government White Paper
 - Planning Policies for Sustainable Building – Guidance for Local Development frameworks produced by the Local Government Association, the Planning Officers Society, the Planning Advisory service, the Waste and Resources Action Programme, the Sustainability Forum, and Enfield Council which advocates that LDF's should contain minimum measurable requirements for water use, energy consumption, building construction etc. in contrast to the South East Plan's policies which simply "encourage" such things.
5. The direction of travel of national policy is clearly indicated in the stance taken in the above policy documents and this demonstrates that a coherent and robust approach to regional sustainability policy is now needed. The current draft regional policies are not aligned with the developing national guidance.
6. The justification for developing stronger regional policy for the South East is strengthened by the fact that the region is a critical driver for national economic growth. It will experience the highest pressures for housing growth and will also be more capable of bearing the cost of delivering higher sustainability standards without impacting on the economic viability of development. It could also be argued that the South East will experience a greater impact of climate change than other regions (particularly in

¹ Strong and Prosperous Communities – The Local Government White Paper October 2006

relation to flood risk and coastal erosion) and has a greater need to take radical action to mitigate impacts of global warming.

7. The current draft regional sustainability policies do not go as far as the draft Sub Regional Policy SH14, developed by PUSH authorities, which has been included within the draft South East Plan.

BACKGROUND TO THE DEVELOPMENT OF POLICY SH14

8. In the South Hampshire area, the work of Merton, and other Councils was recognised in the development of Policy SH 14, which led to the development of minimum measurable requirements for a number of aspects of sustainability within that policy. As a result the draft policy SH 14 is stronger than the regional policies and PUSH would argue that this anomaly needs to be addressed by strengthening the regional policies.
9. Policy SH 14 is stronger than the core regional policies in that the policy provides a **requirement** for developers to act sustainably rather than just encouraging it, and the policy also provides measurable elements that can be readily assessed in relation to individual development proposals. This is essential to provide a clear and effective framework for development control purposes, to establish consistency and to provide certainty of expectations for developers
10. Policy SH14 was developed and tested for robustness through a series of stakeholder workshops in autumn 2005 involving developers, construction experts and planners which concluded that:-
 - The potential for misinterpretation or variability of policy must be minimised
 - Developers must be confident of a consistent approach to sustainable construction requirements through PUSH authority LDF's.
11. The justification for seeking higher standards of sustainability policy in South Hampshire is based on the acceptance within the PUSH sub regional strategy that there is a convincing case for economic growth to address long standing under performance of the economy. But this is within the context of significant environmental assets within and adjoining South Hampshire that need to be carefully protected against the impacts of growth. The aspiration is to achieve sustainable communities through the integration of a higher standards based sustainability policy, which will make a major contribution to the mitigation of the impact of anticipated growth. This is seen as an essential component of the PUSH strategy.
12. Working collaboratively, PUSH authorities are developing a model core strategy policy on sustainability to ensure consistency of approach within LDFs across the sub region. This model policy will be informed by and based on regional and sub regional policy. PUSH would argue therefore that it is essential to get strong regional policies in place supported by

strong sub regional policy reflecting particular sub-regional circumstances. These policies should fully reflect recent national policy changes as well as local aspirations to mitigate the impacts of significant growth and to improve community well being

SPECIFIC RECOMMENDED POLICY ADJUSTMENTS

13. PUSH recommends that the policies be adjusted to Make CC4 EN1 and NRM1 measurable to achieve their principal objective.
14. Specifically in Policy CC4 (the cross cutting policy on sustainable construction), there should be measurable minimal requirements for the use of energy, water, waste, and overall sustainability standards.
15. To provide more detail on what could be achieved by aligning the policies to reflect current national advice the following examples are submitted for consideration.

A measurable minimum requirement for water efficiency

The Code for Sustainable homes is currently being finalised. The consultation paper included a maximum standard for water use in dwellings of 46m³/bedspace/year (125litres /person/day)

A minimum percentage of energy demand met from renewable resources

Policy SH 14 vi in the Draft South East Plan includes

A requirement for developers to provide at least 10% of energy demand from renewable sources in Housing Schemes of over 10 dwellings, and commercial schemes of over 1000 square metres

Sustainable Construction

The LGA document Planning Policies for Sustainable Building includes in section 4.5

A requirement that new development of 1000m² or residential dwellings either numbering 10 or more or being developed on a site having an area of 0.5 hectares or more should submit and implement a site waste management plan to minimise the disposal of wastes to landfill'

A requirement that at least 10 per cent of the total value of materials used derive from recycled and reused content in the products and materials selected

A minimum standard of BREEAM / EcoHomes/ code for sustainable housing or equivalent.

Policy SH 14 vi in the Draft South East Plan includes -

A requirement for new commercial and residential development in the sub region to achieve at minimum an equivalent rating to the EcoHomes / BREEAM very good, and post 2012 an equivalent rating to EcoHomes / BREEAM Excellent

DEVELOPING EVEN MORE ROBUST POLICY

16. Although the type of policy set out above would involve a major step forward across the South East, there are some additional suggestions that could take this even further forward.
- The Hampshire and Isle of Wight Planning Officers Group Conference on the 18th October 2006 found that an estimated 30% of all development is below the threshold of 10 dwellings or 1000m² and will escape some of the current sustainability policy requirements. To avoid confusion with and to build on changes to Building Regulations, consideration should be given to extending standards to all new development and not just development above a given threshold.
 - The fast changing context for sustainability policy will require regular review. The use of an “escalator” principle within the policy (as used in criteria iv of Policy SH 14), will assist in ensuring that requirements are changed on a timely basis across the plan period to reflect the changing context. It will also send a clear message to developers about the likelihood of higher standards in the future.
 - Carbon neutral energy sources generally could be encouraged through use of CO₂ emission reduction targets, of which the renewable energy targets could be a component.