

PARTNERSHIP FOR URBAN SOUTH HAMPSHIRE (PUSH)

RESPONSE TO CONSULTATION QUESTIONS

**PLANNING POLICY STATEMENT: PLANNING AND CLIMATE CHANGE SUPPLEMENT
TO PLANNING POLICY STATEMENT 1**

Q.1 There is an urgent need for action on climate change and we consider that, used positively, spatial planning has a pivotal and significant role in addressing this challenge. We will provide practice guidance to help implement the planning policy for climate change set out in the PPS. Read together, and as part of the wider package of action being taken forward by the Department in *Building a Greener Future* to help deliver the Government's ambition of achieving zero carbon development, will the new policy and proposed practice guidance secure planning strategies that deliver reductions in emissions and shape sustainable communities that are resilient to the climate change now accepted as inevitable?

Yes, however with the qualification that:

- LPAs should be allowed to specify higher energy efficiency standards than that required by the building regulations throughout their entire administrative areas for new developments.
- It should be made clear that LPAs are required to include a renewable policy along the lines of the Merton policy in their DPDs and that this is to achieve CO2 cuts over and above those required by the building regulations.
- The issue of how the CO2 emissions from non-residential development are to be reduced is addressed.
- The energy hierarchy concept is made explicit.
- That LPAs should require new development to connect to existing district energy networks or achieve equivalent CO2 cuts via alternative methods.
- That LPAs should require new development to incorporate community scale energy networks or achieve equivalent CO2 cuts via alternative methods.

Q.2 The PPS sets out Key Planning Objectives and Decision-making principles for the preparation and delivery of spatial strategies by regional planning bodies and all planning authorities. Do you agree with these?

Yes, however consideration should be given to how it will be ensured that the objectives will be truly implemented through the planning system. Care should be taken to ensure that policies that support the PPS objectives are definitely included in LPA DPDs in a form that are implementable and that they are truly implemented. Methods for this include giving example policy wordings for DPDs, monitoring their inclusion in LPA DPDs, writing to and providing training for Planning Panel Members to encourage their assistance in achieving the PPS goals, monitoring of policy implementations through for example the Planning Delivery Grant mechanism.

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Q.3 It is proposed that climate considerations should be a key and integrating theme of the regional spatial strategy (RSS) and be addressed in conjunction with the economic, social and environmental concerns that together inform the overall spatial strategy and its components. Do you agree?

Yes, however care should be taken that climate change considerations are truly integrated into RSS policies in a practical manner.

Q.4a The PPS expects regional planning bodies (RPBs) to consider the likely performance of RSS on mitigating climate change. In doing so, the PPS makes clear that this should be a key part of the sustainability appraisal, which should be used to identify and evaluate possible tensions or inconsistencies between current, or likely future, baseline conditions and securing RSS in line with the Key Planning Objectives in the PPS. Do you agree with the suggested approach?

Yes, however again practical implementation questions need addressing to avoid a process driven approach that in the end fails to deliver the stated objectives.

Q.4b The PPS encourages RPBs, as part of their approach to managing performance on carbon emissions, to produce regional trajectories, to be set out in RSS, for the expected carbon performance of new residential and commercial development. Do you agree with the suggested approach?

Yes. However if we are serious about tackling climate change then developing regional trajectories should be mandatory and translated into sub-regional and LPA targets for achieving CO2 cuts. RSS and LPA DPDs should be updated where it is apparent that regional trajectories are not being met to bring the region back on target. Implementation plans to achieve regional targets should have statutory status.

Q.5 We propose an approach to the identification and allocation of sites and areas for development in which priority should be given to those likely to perform well against the criteria set out in paragraph 19, and that those that perform badly should not normally be considered for allocation for new development. Do you agree with the suggested approach?

Yes, however consideration should be given as to how to ensure that development is tested against the listed criteria and are effective in deterring development that perform poorly against the criteria. Implementation issues are crucial in ensuring policy objectives are met "on the ground".

Q.6 The PPS expects local planning authorities to assess their area's potential for accommodating renewable and low-carbon technologies, including for microrenewables to be secured in new residential, commercial or industrial development.

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Q.6a Do you agree that local planning authorities should consider allocating sites for supplying renewable and/or low-carbon energy and supporting infrastructure, taking care to avoid stifling innovation?

Yes. Consideration should be given as how to ensure that LPAs truly do this.

Q.6b Do you agree that local planning authorities should ensure that a significant proportion of the energy supply of substantial new development is gained on-site and renewably and/or from a decentralised, renewable or low-carbon, energy supply?

Yes. This should be a requirement of LPA DPDs that they take such an approach. It should be stated clearly that the requirement is over and above the building regulations. The policy should be rephrased in terms of carbon rather than energy. No size threshold should be set for the applying the policy. Consideration should be given to ensuring that the policy is implemented “on the ground”. Clear guidance for DC officers on how to do so should be produced (see for example the London Renewables Toolkit which would be a good basis for a practical implementation guidance).

Q.6c Do you agree with the approach for setting out, in a development plan document, a significant proportion of the energy supply of substantial new development to be gained on-site and renewably and/or from a decentralised, renewable or low-carbon, energy supply?

Yes. LPAs should require developers to connect to existing energy networks or achieve equivalent CO2 reductions via alternative methods. Suitably sized new developments should implement community scale energy networks or achieve equivalent CO2 reductions via alternative methods. These two policies would support good quality CHP networks and potential future technologies (such as fuel cell technology). It is one of the advantages of district energy networks that the energy centre can be updated at future dates, instantly providing the benefit to all buildings on the network.

Q.6d Do you agree that in the interim period before “a significant proportion” is tested and defined through the preparation and adoption of a development plan document a standard of 10% should be applied?

Yes, this is highly recommended and very welcome. It should be made explicit that LPA should be asking for 10% renewables now and not to wait until DPDs are updated.

This requirement should be extended to allow LPAs to ask for BREEAM very good standard today and Code for Sustainable Homes Level 1 now.

Q.7 The PPS forms part of a wider package of action being taken forward by the Department to help deliver the Government’s ambition of achieving zero carbon development. This includes the Code for Sustainable Homes and a consultation document, *Building a Greener Future*, which sets out how

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planning, Building Regulations and the Code for Sustainable Homes can drive change, innovations and deliver improvements to the environment.

Q.7a Do you agree that, for the reasons set out in *Building a Greener Future*, there should be a national strategy for regulating the emissions from buildings supported by local promotion of renewable and low-carbon energy supply?

Yes. The experience of other countries in achieving CO2 emission reductions should be considered and the building regulations compared between countries. Where the building regulations of other countries are significantly greater than those here an explanation should be given as to why we should accept lower standards. Arguments about cost should be placed firmly on a quantitative basis and not made in a qualitative manner.

Q.7b Does the framework that we describe give adequate room to authorities and developers to make best use of the opportunities available at different spatial levels, for example district heating and district cooling?

No. It is the experience of Southampton and Woking that developers can build on top of existing energy networks (even installing electric heaters) instead of connecting to the existing network. The PPS needs to state explicitly that LPAs can require developers to connect to existing energy networks or achieve equivalent CO2 cuts via alternative methods. Similarly, suitably sized developments should be required to install community scale energy networks or achieve equivalent CO2 cuts via alternative methods. Without policies that are explicitly clear in allowing LPAs to require action, the status quo is likely to continue.

In addition LPAs should be allowed to request higher energy efficiency standards across their entire administrative area that go beyond the requirements of the building regulations.

Q.8 Paragraph 35 of the PPS expects planning authorities to consider the environmental performance of proposed development, taking particular account of the climate the development is likely to experience over its expected lifetime. Do you agree with this approach?

Yes. Again, consideration to the practical implementation of these design considerations should be given to ensure that they are actually achieved in real development.

Q.9 We consider effective monitoring and review is essential in securing responsive action to tackle climate change. Do you agree that the expected annual monitoring should include outcome performance against the carbon performance trajectories or other yardsticks for identifying trends in performance, and renewables targets set in RSS?

Yes.

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Q.10 Do you consider the proposed scope of the practice guide (at Part 3) covers all the topics it needs to? If not, what is missing, and why? Does the proposed scope of the practice guide include topics which don't need to be covered? If so which, and why?

It would be useful to consider for a range of development scales and contexts how policies could be practically implemented using a range of technologies. Practical guidance on what technologies can achieve, for use by DC officers and developers in ensuring that policies are implemented would be useful. The London Renewables Toolkit would be a good basis for this.

Q.11 The Partial RIA (at Part 4) sets out the likely benefits and costs of the PPS, assessing two options, (i) the "do nothing" option and (ii) implementation of the PPS. Are these options viable? Would you add to/change the disadvantages/advantages of each? Are there any other options that should be considered?

The consideration of more demanding policies should be made.

Q.12 The Partial RIA sets out potential impacts by stakeholder. Would you add to/change the impacts for each group? Are any stakeholders missing from the list?

The alleviation of fuel poverty and maximisation of income through reduced energy and water bills should be mentioned. This is consistent with other government policies and targets.

The benefits of well designed environmental buildings on increased productivity of work forces should be mentioned. Reference to the RICS Green Value study (www.rics.org/greenvalue) could be made.

Q.13 The Partial RIA sets out the likely benefits and costs of the PPS. Do you agree with assumptions made? If not, it would be helpful if you could set out why not and provide any quantifiable evidence available to you on benefits and costs.

The PRIA is a good attempt to quantify costs and benefits of implementing different technologies. Paragraphs 72 to 77 seem a well balanced and considered view of the figures in table 6. Emphasis should be made that the costs of low carbon design are substantially reduced if consideration is given to low carbon design from day 1 of the design process rather than considered as an add-on to completed designs.