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Dear Madam

**RESPONSE FROM PUSH ON PPS RE CLIMATE CHANGE AND SUPPLEMENT TO PPS 1**

The Partnership for Urban South Hampshire (PUSH) is a voluntary working partnership of eleven local authorities stretching from the New Forest to East Hampshire. It was formed in 2003 in response to evidence that the overall economic performance of the sub region was significantly lower than the remainder of South East England.

PUSH consists of the following local authorities: East Hampshire District Council, Eastleigh Borough Council, Fareham Borough Council, Gosport Borough Council, Hampshire County Council, Havant Borough Council, New Forest District Council, Portsmouth City Council, Southampton City Council, Test Valley Borough Council and Winchester City Council. These authorities have been working together to develop a Vision for Urban South Hampshire and have submitted a draft Sub Regional Spatial Strategy as part of the South East Plan.

**In summary the PUSH view is that it should be made clear that Local Planning Authorities:**

- **Can require CO2 reductions that go beyond the requirements of the building regulations.**
- **Can do so across the entire geographical extent of the authority's administrative area.**
- **Can specify low carbon emission zones in specific areas of the authority where higher CO2 emission reductions are required.**

**However:**

- **LPA's should be limited to specifying a given level of the Code for Sustainable Homes for residential development.**
- **The guidance in the PPS should provide clarity on requirements for standards in non-residential development.**

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PUSH recommends the following views:

The schedule of energy/carbon improvement updates to the Building Regulations should, where possible, provide a faster trajectory to zero carbon homes.

Consideration could be given to a separate more challenging schedule in the South East of England where development is likely to be greatest and most challenging.

PUSH strongly welcomes the support given to district energy networks and good quality CHP by the PPS.

PUSH recommends that the wording given in the PPS on Planning and Climate Change for support of district energy networks is strengthened along the lines of Paragraph 8, page 10 of the existing PPS 22 on Renewable Energy, which is given here for ease:

*“Local planning authorities may include policies in local development documents that require a percentage of the energy to be used in new residential, commercial or industrial developments to come from on-site renewable energy developments. Such policies:*

*“i) “should ensure that requirement to generate on-site renewable energy is only applied to developments where the installation of renewable energy generation equipment is viable given the type of development proposed, its location, and design;”*

PUSH recommends a potential wording for the PPS on Planning and Climate Change as follows:

*“Local planning authorities may include policies in local development documents that require new residential, commercial or industrial developments to connect to existing district energy networks or achieve equivalent reductions in CO2 emissions through other approaches”*

A policy that supports the installation of energy networks in large scale developments is recommended. A potential wording is given here:

*“Local planning authorities should include policies in local development documents that require new residential, commercial or industrial developments to incorporate a good quality CHP energy network or achieve equivalent reductions in CO2 emissions through other approaches.”*

As currently worded the PPS and BGF consultation documents have the effect that Building Regulations would now become a maximum rather than a minimum standard. Stated key objectives of the PPS are to secure the highest viable standards of resource and energy efficiency and reduction in carbon emissions. This will be difficult to achieve if local planning authorities (LPA) are not allowed to specify energy efficiency standards that go beyond the building regulations.

PUSH therefore encourages the redrafting of the PPS and BGF to make it explicitly clear that LPAs may specify higher standards. This should not be limited to specific development sites. Any LDD that embraced higher standards as a policy requirement would need to be adequately evidenced and tested for viability, hence there should not be undue concern that LPAs would use higher building standards to discourage housing development.

The argument that developers face a plethora of local standards and that it is therefore desirable to use a common set of national standards (through the code for sustainable homes) has merit. LPAs should be given the freedom to specify higher standards than the building regulations but could be limited to specifying a higher level of the code for sustainable homes (or BREEAM or equivalent assessment method for non-residential development).

It should be noted that there is not enough clarity in the consultation documents of how the building regulations for non-residential development will be updated in the future. PUSH recommends clarity on this issue through specifying the use of the BREEAM assessment methods (or equivalents) and a schedule for non-residential development that requires higher levels to be achieved in future years.

Alternatively the development of a set of codes for non-residential development (to match the range of BREEAM assessment methods that currently exist e.g. BREEAM-schools, BREEAM-offices, BREEAM-retail etc.) could be considered. Again it should be made clear that LPAs may for these developments require higher standards than the building regulations specify, by reference to the appropriate assessment method level. If clarity is not obtained on this issue then the PPS runs the risk of slowing down the trajectory for CO2 reductions from non-residential development.

As worded the PPS and BGF consultation documents do not make it clear that a requirement for onsite renewables that achieves a given % reduction in CO2 emissions is above and beyond that of the building regulations. If this is not made clear then there is the danger of undermining the objectives of this policy.

PUSH recommends that the concept of an energy hierarchy is explicitly mentioned in the PPS. A suggested version for the PPS might be:

- i. Use less energy
- ii. Supply energy efficiently (CHP)
- iii. Use renewable energy onsite
- iv. Offset remaining CO2 emissions

I trust these comments are useful and in addition please find as an appendix to this letter the list of questions set out in the consultation document with the PUSH response.

Yours faithfully

**Councillor Seán D T Woodward**  
**Chairman of the Partnership for Urban South Hampshire**