

PPS Planning and Climate Change: What this means for Local Planning Authorities

Introduction

On 17th December 2007 the Government issued a PPS on Planning and Climate Change¹, which is a Supplement to PPS 1 Delivering Sustainable Development. It sets out how planning, in providing for the new homes, jobs and infrastructure needed by communities, should help shape places with lower carbon emissions and be resilient to the climate change now accepted as inevitable.

ecsc has over twenty five years experience in the sustainable energy industry and works with planning authorities to advise on formation, adoption, implementation and monitoring of Climate Change policies. This briefing note provides guidance for Local Planning Authorities on the PPS on Planning and Climate Change.

Principal issues for local planning authorities

- LPAs should set targets for renewable (or low carbon) energy to be used in new development
- Greater use of local low carbon/renewable energy supply networks is strongly encouraged
- Policies must be based on sound evidence and set out in DPDs
- Progress should be reported in annual monitoring reports

The above points, along with other key messages for planners are discussed in more detail below.

Merton Style policies

Before the final PPS was published there was much debate regarding the inclusion of a Merton rule policy². It is pleasing to see that paragraph 26 encourages LPAs to utilise the Merton Rule. It states that:

"...planning authorities should:

- (i) set out a target percentage of the energy to be used in new development to come from decentralised and renewable or low-carbon energy sources where it is viable. The target should avoid prescription on technologies and be flexible in how carbon savings from local energy supplies are to be secured"*

Reducing Energy or Carbon?

The PPS states that the percentage target should be defined in terms of energy. This is not consistent with other statutory standards (such as building regulations), nor indeed national strategy for reducing the UK's carbon emissions. It will be subject to examination whether in practice a CO₂ reduction policy can be adopted.

Energy Efficiency

Whilst the PPS' Key Planning Objectives include securing energy efficiency (paragraph 9) there is little mention of this within the detail of the PPS. The emphasis on 'Renewable and low-carbon energy sources' (the glossary definition of which makes no mention of energy efficiency) implies that energy efficiency standards will be dealt with through building regulations and that any target reductions should only relate to renewable and/or low-carbon energy sources. It is likely that adopting such a target will, by design, improve energy efficiency levels, as for any given development, improved levels of energy efficiency will give a smaller energy/carbon baseline from which the

¹ The PPS can be downloaded at <http://www.communities.gov.uk/publications/planningandbuilding/ppsclimatechange>

² The Merton Rule, so called because it was pioneered by the London Borough of Merton, requires new development to provide a proportion of its energy demand through renewable generation on-site.

percentage is calculated, meaning that a smaller amount of renewable/low-carbon energy sources will need to be installed, giving a lower cost for the developer.

Site/Area Specific Targets

Paragraph 26 goes on to say:

- (ii) *“where there are particular and demonstrable opportunities for greater use of decentralised and renewable or low-carbon energy than the target percentage, bring forward development area or site-specific targets to secure this potential;*

and, in bringing forward targets,

- (iii) set out the type and size of development to which the target will be applied; and*

- (iv) ensure there is a clear rationale for the target and it is properly tested.”*

Rather than a blanket style Merton Policy that may have been applied across a whole Borough or District, the PPS emphasises that the targets should be distinctive to the type and size of development. This will mean that targets should be specific e.g. differing targets may apply to commercial and domestic developments depending on how easy it is to meet a target (this may be related to cost and technical feasibility).

In addition, site specific targets may be applied where there are opportunities to secure higher standards of renewable and low-carbon energy technologies e.g. Town Centre redevelopment or Sustainable Urban Extensions.

Encouragement for local, decentralised energy supply systems

The PPS is robust concerning the use of local, decentralised and renewable or low-carbon energy supply systems e.g. CHP to development areas or specific sites.

“In considering a development area or site-specific target, planning authorities should pay particular attention to opportunities for utilizing existing decentralised and renewable or low-carbon energy supply systems and to fostering the development of new opportunities to supply proposed and existing development...” (Paragraph 27)

Significantly, the PPS enables LPAs to require development to connect to decentralised energy: *“Where there are existing decentralised energy supply systems, or firm proposals, planning authorities can expect proposed development to connect to an identified system, or be designed to be able to connect in future.”* (Paragraph 27) and (in a specific development area or site) it is possible to *“expect significant proportions of the energy supply of new development to be secured from decentralised and renewable or low-carbon energy sources”* (Paragraph 29).

The PPS stresses the need for planning new decentralised energy infrastructure and securing investment in it. LPAs can expect development to *“contribute to securing the decentralised energy supply system from which it would benefit.”* (Paragraph 27).

Local requirements for sustainable buildings

The PPS outlines local requirements for sustainable buildings. The nationally described building standard for housing is the Code for Sustainable Homes. It is clear from paragraphs 30-32 that it will not be possible to demand a specific level of the Code for Sustainable Homes over a whole local planning authority area, but it will have to be in specific situations and properly tested:

“There will be situations where it could be appropriate for planning authorities to anticipate levels of building sustainability in advance of those set out nationally. When proposing any local requirements for sustainable buildings planning authorities must be able to demonstrate clearly the local circumstances that warrant and allow this. These could include, for example, where:

- *there are clear opportunities for significant use of decentralised and renewable or low carbon energy; or*
- *without the requirement, for example on water efficiency, the envisaged development would be unacceptable for its proposed location.*

When proposing any local requirement for sustainable buildings planning authorities should:

- *focus on development area or site-specific opportunities;*
- *specify the requirement in terms of achievement of nationally described sustainable buildings standards, for example in the case of housing by expecting identified housing proposals to be delivered at a specific level of the Code for Sustainable Homes”*

Evidence-based Local Policies to be defined in DPDs

The PPS makes it clear that any policy should be properly tested and supported by an appropriate evidence base

Paragraph 33: *“Any policy relating to local requirements for decentralised energy supply to new development or for sustainable buildings should be set out in a DPD, not a supplementary planning document, so as to ensure examination by an independent Inspector. In doing so, planning authorities should:*

- *ensure what is proposed is evidence-based and viable, having regard to the overall costs of bringing sites to the market (including the costs of any necessary supporting infrastructure) and the need to avoid any adverse impact on the development needs of communities;”*

Paragraph 26: *“Planning authorities should have an evidence-based understanding of the local feasibility and potential for renewable and low-carbon technologies, including microgeneration, to supply new development in their area. This may require them, working closely with industry and drawing in other appropriate expertise, to make their own assessments.”*

It is apparent that local targets will need to be included in a DPD and rigorously tested. A locally specific evidence base will need to be provided to illustrate how a carbon reduction policy will impact other policy objectives such as sustainable transport, sustainable communities, economic viability and community infrastructure. Critically, LPAs will need to demonstrate housing supply will not be adversely affected by climate change policies.

Monitoring and Review

The PPS stresses the need for planning authorities to demonstrate that they have considered how policies will be monitored and reviewed. Paragraphs 34 says *“...Annual monitoring should assess progress against the objectives of this PPS and be integrated with monitoring of housing delivery and other policies. Annual monitoring reports should describe performance and, as necessary, the action intended to improve implementation or to update the strategy.”* This will require LPAs to have systems in place so that they can efficiently monitor policies.

Adaptation

A Key Planning Objective within the PPS is to *“secure new development and shape places that minimise vulnerability, and provide resilience, to climate change; and in ways that are consistent with social cohesion and inclusion;”*

This is fundamental for adaptation to Climate Change and paragraph 42 states that *“planning authorities should expect new development to:*

- *take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption, including maximising cooling and avoiding solar gain in the summer; and, overall, be planned so as to minimise carbon dioxide emissions through giving careful consideration to how all aspects of*

development form, together with the proposed density and mix of development, support opportunities for decentralised and renewable or low-carbon energy supply;

- deliver a high quality local environment;*
- provide public and private open space as appropriate so that it offers accessible choice of shade and shelter, recognising the opportunities for flood storage, wildlife and people provided by multifunctional greenspaces;*
- give priority to the use of sustainable drainage systems, paying attention to the potential contribution to be gained to water harvesting from impermeable surfaces and encourage layouts that accommodate waste water recycling;*
- provide for sustainable waste management...”*

About ecsc

ecsc has expertise in advising local authorities on Climate Change Planning Policy including core strategy evidence base and SPD development. ecsc also specialises in facilitating the reduction of carbon emissions in new development through its highly qualified technical services team which liaises with all parties in the design of new developments including architects, designers, site managers, developers, and local planning authorities.

ecsc has recently developed a web based service, C-Plan (www.carbonplanner.co.uk) which allows local planning authorities to have an effective policy implementation and monitoring process for assessing new developments against sustainable energy criteria.

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