



*environmental protection, improvement, innovation*

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NSCA  
44 Grand Parade  
Brighton  
BN2 9QA  
www.nasca.org.uk  
Tel: 01273 878771  
Email: edearnley@nsca.org.uk

Sent by email to: CCPPSConsultation@communities.gsi.gov.uk

5<sup>th</sup> March 2007

Dear Sarah

**NSCA AIR QUALITY COMMITTEE RESPONSE TO PPS1 SUPPLEMENT  
CONSULTATION: PLANNING AND CLIMATE CHANGE**

I am writing on behalf of NSCA's Air Quality Committee in response to the consultation document 'Planning Policy Statement: Planning and Climate Change, Supplement to PPS1'.

The NSCA Air Quality Committee has considered the consultation document and welcomes the opportunity to comment on the proposals. Our full comments are as follows:

**1. Summary of Main Points**

1.1 NSCA is a strong supporter of work to reduce carbon emissions and prepare for the impact of a changing climate. With housing being a significant source of carbon emissions we applaud the production of the PPS1 supplement and it's companion piece 'Building a Greener Future'.

1.2 Transport remains a significant and rising source of both carbon dioxide and local air pollutant emissions. It is therefore encouraging that the draft PPS1 supplement includes actions to minimise the use of road vehicles. This will help reduce emissions of carbon dioxide, improve air quality and reduce levels of noise.

1.3 In its desire to reduce carbon emissions the draft PPS supplement misses an opportunity to address a wider range of environmental issues. Combustion of fuels for home heating and power produces both carbon dioxide and local air pollutants; policy needs to encourage co-management of both to secure benefits in both areas. Pursuing these policy areas separately will risk work to improve air quality increasing carbon emissions and vice-versa.

1.4 Whilst NSCA recognises the potential of Combined Heat and Power to reduce global emissions of carbon dioxide and local air pollutants we feel careful consideration needs to be given to the location of CHP plant, tying in with the UK Air Quality Strategy and policy on Local Air Quality Management Areas. In areas where air quality is poor, CHP based on fossil fuel or biomass combustion may not be appropriate technologies, and non-combustion based renewables would be more desirable. Although the detail will be set out in subsequent guidance we feel that the PPS supplement should make reference to this concept.

## **2. About NSCA**

2.1 NSCA (National Society for Clean Air and Environmental Protection) is the environmental protection charity that brings together organisations across the public, private and voluntary sectors to promote a balanced and innovative approach to understanding and solving environmental problems, through policy development and education. We are a registered charity with over 100 years experience of environmental campaigning, public information provision, producing educational resources and policy formulation.

NSCA's Air Quality Committee brings together policy makers, regulators and practitioners from central and national Government, local authorities, consultants, developers, academics, the Environment Agencies, industry, interested NGOs as well as members from the NSCA regional divisions. As such it is able to draw on a wide range of expertise and views from representatives of the entire air quality community. Further details are available at [www.nasca.org.uk](http://www.nasca.org.uk).

## **3. Detailed Comments on the Draft PPS1 Supplement**

3.1 In our response to the consultation we have not attempted to answer all of the questions but instead integrated the consultation questions into the commentary below.

### **3.2 Overall Vision (Question 1)**

NSCA supports the overall plan of action laid out in the draft PPS1 supplement and 'Building a Greener Future'. If a broad base of support is achieved from local authorities and developers the plans will help to greatly reduce the climate impact from new housing and ensure it is resilient to unavoidable climate change.

We do feel, however, that this supplement misses an opportunity to address a wider range of environmental issues. It is important to understand that climate change as an issue does not exist in isolation and that it affects, and is affected by, a wide range of other environmental, social and economic issues. It is therefore essential that in its zeal to address climate change public policy does not forget to make the relevant policy linkages, particularly where very obvious links exist like co-management of air emissions (carbon and local air pollutants).

### **3.3 RSS (Questions 2 and 3)**

We agree with the key planning objectives and decision-making principals set out in paragraph 9. We also support the integration principals in paragraph 15, however we feel that more could be made of opportunities in two areas. Firstly, new developments can help improve sustainable transport provision in existing developed areas by creating the critical population masses necessary for effective public transport and other services. This is currently not highlighted in the draft PPS supplement. Secondly, there is no mention of linkages with national or regional air quality strategies or action plans – as previously stated co-management of air emissions is essential to secure benefits on both carbon and local air pollutant emissions.

### **3.4 Allocation of Sites (Question 5)**

We support the criteria for identifying development land as laid out in paragraph 19, however in line with our comments in 3.2 we do feel that a wider approach would be more appropriate. Specifically, we suggest that a consideration of local air quality, development's affect on air quality, and the likely affect of climate change (hotter summers mean more summer pollution episodes), are needed. A tie in with Local Air Quality Management is appropriate, for example, identification of land should consider the proximity of any Air Quality Management Areas and development's likely affect on these.

### 3.5 Accommodating Low Carbon Energy (**Question 6**)

On the whole, we agree with the approach to incorporating low carbon/ renewable energy into new buildings. We would however advise that development authorities need to be able to provide site-specific guidance on appropriate technologies to use, and linkages made with local air quality management and noise policy. In particular combustion technologies such as Combined Heat and Power have the effect of removing emissions from remote point sources (power stations) and into our towns and cities. This may have a negative effect on resident's health in areas of poor or marginal air quality. We therefore recommend that an assessment of the location's proximity to any Air Quality Management Areas and the power of a development authority to recommend suitable technologies should be included in paragraphs 36 or 37 (safeguarding environmental performance).

With regard to **Question 6d** we believe that the very high energy efficiency of dwellings constructed under the PPS will mean that a 10% standard for decentralised renewable/ low carbon energy will not be demanding, and that a higher standard is easily achievable. We also stress that definition of the target should clearly state whether it is for total energy consumption or just electricity consumption.

### 3.6 Designing for Environmental Performance (**Question 8**)

We agree broadly with the considerations set out in paragraph 35. The considerations should, however, give a greater weight to designing buildings with sufficient cooling capacity to deal with the predicted climate at the end of their design life without air conditioning. With the recent hot summers, sales of home air conditioning units have increased rapidly, and widespread adoption in the future could significantly raise carbon emissions.

We also believe that the PPS supplement should include provision for electric vehicles charging points within paragraph 35. Advances in battery technology and the forthcoming introduction of 'plug in' hybrid vehicles are making electric vehicles a viable alternative with substantial benefits in reduced carbon emissions, noise and local air pollution. Uptake will be harmed however if people have nowhere to charge their vehicles.

### 3.7 Monitoring and Review (**Question 9**)

We agree with the monitoring and review procedure set out in the draft PPS supplement. In addition, we suggest that a proportion of homes constructed under the PPS guidelines should be monitored to determine their actual carbon emissions under occupation, as how residents interact with their homes may cause significant deviations from projected emissions.

### 3.8 Scope of Practise Guide (**Question 10**)

The two-part practice guide seems well organised and we agree with the majority of the proposed content. For part 1 we again stress that all of the potential policy linkages need to be considered. Policy on climate change should not be considered in isolation from policy in areas climate change will impact on. A full review of policy linkages should therefore be suggested by the practice guide, to include areas such as renewable energy, transport, biodiversity, air quality, health, noise, flood defence and tourism.

The technical and good practice guide will play a key part in informing decision-making. Here we believe that the guide should particularly look at good practice in countries with similar climates to that which climate models predict English regions will experience in 50-100 years time. This will help spotlight housing that will adapt well to our changing climate.

### 3.9 Partial RIA (Question 13)

We do not believe that the Partial RIA takes into account one of the draft recommendations from DEFRA's Air Quality Expert Group. This is, 'Environmental impact analysis of policies or specific developments, whether for industry, transport, housing etc, should consider the full range of emissions. In particular, measures at national level designed to improve local air quality or to abate greenhouse warming should not be implemented without prior consideration of all types of impact on the atmosphere and other environmental media'. One example here is that under the Health Impacts section (paragraphs 85-89) no mention is made of the PPS supplement's potential to reduce air emissions from housing (through decreased energy consumption) and transport (through reduced demand) and the improvement in health this could bring.

If you wish to discuss these issues further, or need clarification of any point, please let me know.

Yours Sincerely

Ed Dearnley  
Policy Officer