

Response to Consultation on Planning Policy Statement Eco-Towns on behalf of the Low Emission Strategies Partnership

Low Emission Strategies

Low Emission Strategies (LES) provide a package of measures to help mitigate the transport impacts of development. Their primary aim is to accelerate the uptake of low emission fuels and technologies in and around a new development, thereby complementing other design and mitigation options, such as travel planning and the provision of public transport infrastructure.

The LES Partnership

The LES Partnership supports adoption and implementation of Low Emission Strategies by local authorities. The group builds on momentum generated during the Air Quality Beacons Year (2007/8), when Greenwich Council received recognition for its pioneering work in this area. Underlying the partnership is a practical programme of work centred on a nationally funded performance improvement scheme. The partnership comprises a peer group of fifteen local authorities working together to support local implementation of LES and to demonstrate good practice; an advisory group encompassing experts and practitioners from central government, local government, consultancies, industry, academia and the NGO sector; and a management board. The Board includes representatives from Greenwich, Sheffield, Sefton, Croydon and City of London councils, plus LACORS (www.lacors.gov.uk) and Cenex (www.cenex.co.uk). The work is funded by grants from Defra and CLG in combination with significant match/in-kind funding from wider participating organisations.

Further information, including a copy of the latest LES practice guidance may be found by visiting the Low Emission Strategies website (www.LowEmissionStrategies.org.uk)

Response to the Consultation

The partnership welcomes the opportunity to comment on the draft PPS Eco-towns. Our note provides a summary response. We would welcome the opportunity to engage more deeply with the development of the final PPS, particularly in terms of embedding Low Emission thinking into the document and also and in supporting the development of a zero carbon standard, which takes transport emissions into account.

Key Recommendations

1. PPS eco-towns should emphasise the importance of managing the air quality impacts of new developments as well as green house gas emissions. In doing so it should point to the significant opportunities for co-managing the twin concerns.
2. The zero carbon standard should be amended to include transport emissions associated with the development, occupation and use of the new development
3. The transport standard should recognise the importance of going beyond trip management to tackle 'residual emissions' as well. In doing so, it should recognise and promote the use of Low Emission Strategies, their underlying principles and associated measures.

Modification to the Transport standard

We propose the following paragraph for insertion into the transport standard (new para after 4.13): '*Planning applications must assess and make provision for managing and mitigating the residual emissions generated by travel within and around the proposed eco-town. The development of Low Emission Strategies, which provide a package of measures to accelerate the adoption of low emission transport fuels and technologies provide a key mechanism for achieving these aims*'.

Response to Consultation questions

Q4.3 Are there any standards that you feel are missing (that are not covered in other government policy and guidance)

Air pollution remains a serious threat to health and the environment. The standard makes no reference to local air quality management nor to the synergies, which are possible by adopting a co-management approach with climate change. From a transport perspective, this omission poses a threat to air quality not just within an eco-town, but also beyond its boundaries as a consequence of vehicles moving to and from the new centre.

Recommendation: PPS eco-towns should emphasise the importance of managing the air quality impacts of new developments. In doing so it should point to the significant opportunities for co-managing air quality and climate change.

Q4.5 The zero carbon standard attempts to ensure that carbon emissions related to the built environment in eco-towns are zero or below. Have we specified the calculations of net emissions clearly in a way that avoids perverse incentives and loopholes. Is this standard the most cost effective way to do this?

The zero carbon standard excludes emissions associated with transport. The omission creates a loophole, which allows supposedly zero carbon developments to contribute significantly to local CO₂ emissions (and associated air pollutant emissions) *via* the transport associated with their development, occupation and use.

The standard also creates a perverse incentive to avoid measures which encourage the electrification of local fleets (e.g. *via* provision of associated charging infrastructure), since on site charging of electric vehicles will increase on-site power demand and therefore have implications for compliance with the zero carbon standard. This perverse incentive can be removed by including all transport energy use within the definition.

The Low Emission Strategies Partnership recognises that work is required to establish robust protocols and methodology to support the inclusion of transport into the zero carbon standard. Our work programme already sets out to tackle related technical and practical issues. We would welcome the opportunity to engage more deeply with the development of the final PPS, particularly in supporting the development of a true zero carbon standard, which takes transport emissions into account.

Recommendation: The zero carbon standard should be amended to include 'transport emissions associated with the development, occupation and use of the new development'

Q4.9 The transport standard attempts to support people's desire for mobility whilst enabling low carbon living. Is it sufficiently clear and workable

The transport standard focuses almost exclusively on trip management (i.e. reducing the need for trips and supporting travel by more sustainable modes). This is very important and we support this approach. However, it will never be possible to eliminate all trips associated with a development and so residual emissions will always remain. The transport standard makes no reference to managing these residual impacts.

Low Emission Strategies provide an established mechanism for mitigating the residual emissions (both air quality pollutants and greenhouse gasses) from transport. They also offer the potential for developments to enhance the local environment and achieve 'true' low/zero carbon status (see Q4.5). Their potential and importance should be recognised within the transport standard.

Recommendation: The transport standard should recognise the importance of going beyond trip management and tackle 'residual emissions' as well. In doing so, it should recognise and promote the use of Low Emission Strategies, their underlying principles and associated measures.

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