

Climate Change Coordinator Comments

Application No	APP/26/00035
Address	Premier Inn Portsmouth (Havant), 65 Bedhampton Hill Road, Bedhampton, Havant, PO9 3JN
Development	Erection of 90 dwellings with associated landscaping, parking and improved access.
Case Officer	LW
Comments By	EC
Date of Comments	8 th April 2026

Corporate/Policy Position

Climate Change and Sustainability considerations are included in the below policies of the Councils adopted local plan and within the Councils Climate Change Strategy and Action Plan.

The Council adopted its Climate Change Strategy and Action Plan in 2024 and has ambitious goals to be a net zero borough by 2045 and to achieve a reduction in greenhouse gas emissions by 68% by 2030.

The council declared a climate emergency in November 2024 acknowledging the need and transformative action in response to the climate crisis and in 2025 the authority declared a nature emergency.

Therefore, weight should be given to applications aiming to encourage the installation of sustainable and low carbon technologies and support the removal/reduction of greenhouse gas emissions being produced.

Within the Councils adopted Local Plan (Core Strategy) the following policies are relevant

- CS13- Green Infrastructure
- CS14- Efficient use of resources

Climate Change

The Council's new strategy place's significant emphasis and weight within the role of planning not just to reduce emissions but to provide sustainable development for the length of its lifespan, removing any requirement for significant retrofitting and cost in the future. A development of this scale would be expected to reflect this.

The Councils Climate Change Strategy and Action Plan is striving to achieve a 68% reduction in emissions by 2030 with net zero targets agreed for the authority by 2035 and for the borough by 2045.

Building sustainable development within the Borough is significantly important for achieving these targets and alongside the application the following documents have been submitted including:

- 1) Premier Inn Portsmouth (Havant) Bedroom Extension: Energy Strategy: C9156-TLP-00-XX-XX-BP-100 P01 – Energy Strategy
- 2) WHITBREAD GROUP PLC- Sustainability Statement

Within the Energy Strategy it is outlined that an energy hierarchy will be followed to ensure the Be Lean, Be Clean, Be Green is achieved.

Accordingly, this Energy Strategy confirms that the overall development's carbon emissions will be reduced to 20.8CO₂ TPA which is a reduction of 1.36% below the Part L 2021 baseline.

The energy hierarchy carbon reduction methodology has minimised energy usage where possible and it is considered therefore that the works are able to provide a low-energy building.

The sustainability statement submitted contains a lot of detail regarding the overall approach to sustainability from the Whitbread Group, outlining more specifically that: **'A SBEM assessment was carried out on a typical Premier Inn Extension. This demonstrated that the development performs much better, from an environmental point of view, than one designed to meet the minimum current standards; Carbon Reduction on Building Regulations Target Levels; The SBEM BER was 12.51 kg CO₂/m² pa compared with a TER of 13.4 kg CO₂/m²pa. Thus, the design achieves a reduction of around 5-6% of the TER.'**

The reductions achieved in carbon are noted and it is positive to see a scheme considering the above and implementing the approach of following the energy hierarchy.

It is noted that these calculations are based on Target Emission Rate to measure carbon reduction which uses outputs of energy based on a notional building of a similar scale and development. Using other energy intensity metrics permits a fuller, more in depth assessment of the performance of energy within a development which can lead to greater and more accurate performance measures of how carbon intensive a development can be, something which this site could consider.

CS13- Green Infrastructure

Policy CS13 supports the inclusion and enhancement of green infrastructure within development proposals. This can be from numerous areas such as the creation of green walls, green roofs, allotments, parklets, community gardens and green open spaces with play spaces.

These are all additional ways to incorporate green infrastructure and co-benefits into developments, the detail of which should be outlined within a planning application.

Any planning application should be enhancing this provision where possible and outlining within the design where these measures will be incorporated through a sustainability statement, supporting information and plans that are submitted.

CS14- Efficient use of resources

Policy CS14 seeks to ensure that any planning application provides adequate land for waste management, incorporates renewable energy, achieves higher levels of carbon reduction and for non-residential development achieves the BREEAM 'Very Good' standard, unless proven to be financially or technically unviable in line with Policy CS14 of the adopted Core Strategy.

Although BREEAM would not be required for this C1 use, in order to comply with policy the design and proposal should be including renewable energies and carbon reduction measures. It is noted from the design proposals that no solar PV is proposed alongside other renewable measures onsite, and that most of the renewable energy is associated

with sourcing energy/electricity from renewable sources. It would be suggested that a condition regarding EV infrastructure onsite is included with any planning decision.

Conclusion:

Following an assessment of both the energy and sustainability statements submitted with the application it has been outlined that carbon reduction of emissions can be accommodated onsite with following an energy hierarchy and installing low-carbon measures meaning the works exceed the requirement of building regulations part L.

The energy statement states that: *'Thornley and Lumb will consider the sustainability of the proposed development and the building's energy usage throughout the design process by developing an energy strategy design philosophy. This will consist of four underlying design principles which will be implemented to ensure the sustainability of the proposed development. The principles used to develop the energy strategy are:*

- *Reduce demand*
- *Meet demand efficiently*
- *Supply from low carbon sources*
- *Supply from renewables.*

It is considered that the first 3 points of the above are achieved with the fourth point being considered to be achieved with meeting the energy supply/ electricity onsite from renewable sources. It would be considered that a site of this scale could and should be considering renewable technologies onsite in the form of solar PV, EVs and/or others. However, the works are considered to comply with policy and with the inclusion of a condition around EVs, the application can be supported.