

RTPI Cymru



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mediation of space · making of place
cyd drefnu gofod · creu cynefin

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7th October 2008

Paul Lewis
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Planning Division
Welsh Assembly Government
Cathays Park
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Dear Paul

Planning for Climate Change: Further Consultation

RTPI Cymru is pleased to submit a response to the proposed changes to the Planning for Climate Change MIPPS (12/06). RTPI Cymru's Policy and Research Forum has considered the proposals and its responses are contained in the attached appendix against the questions.

RTPI Cymru supports the Assembly Government's aims to strengthen planning policy with regard to climate change issues.

Effective spatial planning has the potential to limit and mitigate the effects of climate change processes, by promoting spatial distributions of new use and development and approaches to access and design that cap or reduce the emissions of carbon;

However, noting scientific views that climate change is already in train, effective spatial planning can also be used to identify and support the implementation of spatial and physical adaptation to enable communities to respond to either predicted climate change effects or, more critically, to improve our capacity to respond to the uncertainties posed.

I trust you find the Forum's comments helpful but do not hesitate to contact me should you require any further clarification. The Forum has no objection to these comments being made public.

Yours sincerely,

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RTPI Cymru Response to - Planning for Climate Change: Further Consultation

Q1 Do you consider these additions appropriate?

Yes. It is helpful to set out the need to tackle both mitigation and adaptation, in order for the policy to be clear that it is set out against the need to tackle both.

Q2 Do you agree that Planning Policy Wales should set out a national development control policy requiring a minimum sustainable building standard?

Yes. Having a clear standard contained within national planning policy which development should meet is supported. This should be further enhanced through amendments to the Building Regulations.

Q3 Do you consider that the threshold of major developments an appropriate level to require a sustainable buildings standard?

In principle all new buildings should be required to adopt the standard. There is a risk that by introducing a threshold, smaller piecemeal developments will be taken forward to avoid such requirements. It is also likely that the majority of developments within rural areas are likely to be less than ten units.

However, the Forum recognises that for smaller developments there may need to be a phasing in of the standard to enable information and understanding about how to achieve the standard to be widespread.

Q4 Should this policy or a different level apply to all developments submitted after April 2009?

Yes. However, it will be important to ensure that this is accompanied by a major awareness raising exercise to avoid confusion by applicants.

Q5 Do you agree that the level sets using the CSH/BREEAM standard are appropriate and achievable for the majority of new developments in Wales?

The policy needs to lead on setting standards and provide industry with an impetus to implement these higher standards. A laissez faire approach will not work, as evidenced by experience to date.

Q6 Should planning conditions be used to secure the minimum standards as set out above?

Yes.

Q7 Do you agree that the 10% requirement should be in addition to carbon emissions secured to meet the minimum standard under the Code for Sustainable Homes and/or BREEAM?

Yes. However, wherever possible developments should be encouraged and enabled to attain the highest level of reductions and not to meet purely a minimum standard.

Q 8 Do you agree that both on-site and near-site solutions should be used to secure local renewable and low carbon energy sources?

Yes, as it is not always feasible to comply with this within a site. It would also be helpful for a definition of 'near site' to support negotiations and the decision making process.

Q9 Should this policy apply or a different percentage apply to all developments submitted after April 2009?

It would be beneficial for all changes and standards to be introduced at the same time, in order that confusion is reduced.

Q10 Should there be other opportunities for developers to meet this requirement and reduce their carbon emissions further such as through offsetting the carbon emissions from their proposed development through financial contributions.

All developments should be able to meet the requirements on site (or near site, as in Q8). Off setting should not be supported as a general principle.

Q11 Do you agree with the approach for setting out, in a local development plan, higher standards and requirements for 'strategic sites'?

All sites, not solely 'strategic sites', should be able to support high standards.

Q12 Do you consider that the policy should allow for exceptions to meeting the minimum standard? And if so, what exceptions should apply?

See Q11.

Q13 Do you agree that April 2009 is an appropriate date for both policies to commence?

It is imperative that land use responses to climate change are commenced across the board at the earliest opportunity, given the nature of the effects of climate change. However, for the policy to work, any start date must be preceded by an effective awareness raising campaign to ensure the industry is fully briefed. In addition local planning authorities (LPAs) will also need to be fully aware of how to implement such policies.

Q14 Do you consider that the combination of a sustainable building standard and a requirement for decentralised and renewable and low carbon energy sources provides an appropriate balance between energy efficiency, reducing carbon emissions and promoting the microgeneration industry in Wales?

Yes.

Q15 Do you have any suggestions for content for the Technical Advice Note, specifically relating to the proposed amendments contained in this consultation?

Examples of good practice and guidance would be helpful to accompany the TAN.

Q16 How should compliance with the sustainable building standard (para 2.10.4) and local renewable and low carbon sources percentage (para 2.10.6) be considered in the Design and Access Statement?

An important issue here is ensuring that there are sufficient skills and knowledge within LPAs to appropriately assess Design and Access Statements.