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Low Carbon Business Opportunities Unit  
1 Victoria Street  
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SW1H 0ET

Email response sent to: [lowcarbon@berr.gsi.gov.uk](mailto:lowcarbon@berr.gsi.gov.uk)

Dear Sir or Madam,

## **CONSULTATION RESPONSE TO THE VISION FOR A LOW CARBON INDUSTRIAL STRATEGY BY THE ROYAL TOWN PLANNING INSTITUTE**

Thank you for the opportunity to respond to the current consultation on the government's Vision for a Low Carbon Industrial Strategy. The RTPI is a membership organisation representing over 22,000 spatial planners. It exists to advance the science and art of town planning for the benefit of the public.

The Vision for a Low Carbon Industrial Strategy is clearly aspirational and promotional at this stage. The outline for the strategy itself that can be discerned from the consultation document provides a sensible but incomplete framework for policy and action focussed understandably on a primarily business audience. The RTPI and other built environment professions are working to develop a practical approach to tackling the challenge of climate change through the Construction Industry Council. The RTPI would welcome an opportunity to develop these initiatives into a broader and more comprehensive approach with the Department for Communities and Local Government (CLG) the Department for Business, Enterprise and Regulatory Reform (BERR) and the Department for Energy and Climate Change (DECC).

### **Consultation process**

The RTPI believes that the significance of this Vision for a Low Carbon Industrial Strategy should not be underestimated and for this reason we feel the need to express a number of concerns with the procedure undertaken and the information provided, for this consultation. This consultation was not undertaken for the standard three month period, it was not made available via the usual channels for government consultations and it was presented solely in a non-traditional format without specifying a clear deadline for comment. For these reasons, the RTPI did not pick up the consultation until late in the brief consultation period and it has had to prepare a response without feedback from its membership.

Ministers have the discretion not to conduct formal consultation exercises under the terms of HM Government Code of Practice on Consultation. The Code of Practice states that it applies to circumstances where the Government has decided to run a formal, written, public consultation exercise. It continues that 'when departments decide only to carry out engagement in ways other than formal, written consultation, they are encouraged to be clear about the reasons why the methods being used have been chosen.' In this case the Department for Business, Enterprises and Regulatory Reform has undertaken a public consultation exercise as a means of seeking input from interested parties and should, therefore, comply with the Code.

Criterion 3 of the Code of Practice requires consultation documents to be clear about the consultation process. The RTPI does not feel that this criterion has been met in this consultation. Furthermore, under Criterion 2 of the Code 'Duration of

Consultation Exercises' it is stated that consultations should normally last for at least 12 weeks. It is stated that the interactive website 'will run throughout March and be reviewed in April'. In addition, it was not listed on the department's consultation page <http://www.berr.gov.uk/consultations/open-consultations/index.html> and therefore was not available through the usual access channels for interested parties.

Clearly, the limited and unclear duration of the consultation, the avenues through which the consultation has been publicised, and the sole reliance on the non-standard consultation mechanism of the interactive website, significantly reduces the capacity of a wide range of interested parties to effectively participate in this consultation. Nevertheless, the Institute has responded at this juncture because it is an important stage in the development of the vision for a low carbon industrial strategy which must be fully engaged with spatial planning.

### **The New Vision for Planning: Planning to Live with Climate Change**

The Institute is currently engaged in the review of its New Vision for Planning (2001) and the need to ensure that climate change is recognised as the fundamental driver behind sustainable development. The RTPI's consultation report to its members on the review of the New Vision for Planning proposes that the initial focus of the response to climate change should be on how to facilitate the movement towards more sustainable energy generation and use and on how to develop more sustainable forms of communities which are based on lower energy and de-carbonised systems of movement.

The RTPI views low carbon industry as providing the key to sustainable economic growth for the UK. Achieving low carbon industry will require a significant volume of new use and development for which planning permission will be required. However, a green economy and sustainable economic growth are likely to involve a fundamental shift in the way the economy operates and in the priorities which drive it. In a spatial context, there is need to consider the configurations which will promote the delivery of a genuinely low carbon economy. From the planning perspective, this means looking at issues such as siting new development and movement patterns resulting from business operations and from the business perspective how organisational behaviour patterns will need to be refocused. Businesses will need support and incentives to adopt lower carbon, more resource-efficient ways of working. Whilst the RTPI supports measures such as investment in the development of low carbon vehicles, it should be stressed that the creation of a low carbon economy, requires a broader focus than one which concentrates purely on investment in new low carbon technologies. For example, investment in the provision of a first class public transport infrastructure and other sustainable means of transport will be an essential component of a genuinely green industrial revolution. Similarly, the planning system as a 'smart regulator' can adopt policies that promote and incentivises the development of markets for low carbon technologies and new means of social, economic and spatial organisation that reduce carbon emissions.

### **Planning policies to help deliver a low carbon economy**

It will be critically important that planning policies that shape the places where such growth might take place, take account of the benefit to be gained from low carbon industrial development. The right policies are needed at the central, regional and local government levels. The consultation emphasises the important of 'putting in place the energy infrastructure for the UK's low carbon future – in renewables, nuclear, carbon capture and storage, and a 'smart grid.' The RTPI is supportive of the National Policy Statements which will facilitate the delivery of a low carbon energy infrastructure at a national level. However, our members feel that the creation of a national spatial strategy, indicating in broad terms where these changes will occur, is essential to ensure that the goal of a low carbon economy and sustainable economic growth is integrated with a clear national spatial strategy. Similarly the low carbon economic agenda needs to be central to the integrated regional economic and spatial strategies proposed in the Local Democracy and Economic Development Bill now before parliament.

Planning provides the tools to identify the infrastructure facilities that will be necessary to support low carbon industry and, in part, how they can be funded and provided. The RTPI would like to highlight the potential for the Infrastructure Delivery Plans in this respect and calls on the government to support regional and local authorities in the establishment of ambitious carbon reduction standards which will provide incentives and drivers through which the opportunity to develop a low carbon economy can be fully realised.

Planning has a vital role in the generation of demand for low carbon industrial outputs through 'smart regulation' of other sectors of the economy, for example, through planning policies that require the provision of appropriate levels of local renewable energy generation and green travel requirements. The RTPI has previously expressed its strong support for the Government's aim to apply zero carbon measures to non-domestic buildings from 2019.<sup>i</sup> The Institute would now like

to reiterate its view that a firm commitment to the establishment of a strict timetable for the delivery for the reduction of emissions from new commercial development is urgently required. Furthermore, the RTPI urges the government to investigate the use of its powers to facilitate the application of measures to deliver greater resource and carbon efficiencies from existing commercial buildings.

### **Planning skills to help deliver a low carbon economy**

The Vision for a Low Carbon Industrial Strategy identifies the need to ensure the UK is equipped with an appropriate skills base as one of the drivers of fundamental change. Planners need the skills necessary to form judgements about planning policy and planning decisions that will underpin the growth of low carbon industry. The RTPI aims to deliver the necessary skills through its partnerships with universities providing planning education and training, and our requirement that all chartered town planners in practice undertake relevant continuing professional development. The development of skills amongst planners for addressing economic and low carbon issues are two of the key areas the RTPI has identified as requiring further support and development. The RTPI seeks the support and collaboration of BERR, DECC and CLG to ensure that this capacity is embedded within the skills base of our profession to enable the effective delivery of a low carbon economy.

### **Further development**

The Institute regrets that it has been unable to give the Vision for a Low Carbon Industrial Strategy the consideration that it would normally give to a consultation of this national and global importance because of the limited nature of the consultation process. It will therefore consult its membership in the normal way and combine the results of that further consultation with its continuing work on developing its review of The New Vision for Planning as the new initiative to promote "Planning to Live with Climate Change". This new initiative will be launched at the Planning Convention in June with the Rt Hon Margaret Beckett MP, Minister for Planning and Housing, and will then be taken forward into a programme of dialogue with government departments, other public and private sector stakeholders, the planning profession and other practitioners in the planning process. We hope this will provide opportunities to develop and progress a positive dialogue with the Department for Business, Enterprise and Regulatory Reform as the Low Carbon Industrial Strategy is developed, delivered and reviewed into the future.

If you require any further assistance or would like to meet to discuss the RTPI's climate change policy work and the relationship between this and your strategy, please contact Luke Dickson, Planning Policy Officer on 0207 929 9494 or email [policy@rtpi.org.uk](mailto:policy@rtpi.org.uk).

Yours sincerely,



DIGITALLY SIGNED BY RYND SMITH  
not for unauthorised use

Rynd Smith  
**Director Policy and Communications**  
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<sup>i</sup> [Definition of Zero carbon Homes and Non-Domestic Buildings consultation](#). England (P2009/03/02)