



**RTPI**

mediation of space · making of place

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Dear Sir or Madam,

**CONSULTATION RESPONSE TO THE HEAT AND ENERGY SAVING STRATEGY  
BY THE ROYAL TOWN PLANNING INSTITUTE**

Thank you for the opportunity to respond to the above consultation. 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 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.

Heating represents 47% of the UK CO<sub>2</sub> emissions and measures for its decarbonisation are, therefore, vitally important. The RTPI supports the ambitions and objectives contained in the Strategy, and it welcomes the acknowledgement of the importance of planning in facilitating the development of low carbon energy infrastructure.

**Pathway to 2050**

The RTPI supports the level of ambition outlined in this document but feels that the indicative pathway would benefit from a firm commitment to a clear timetable of emissions reductions from existing building stock, as has been established for the Zero Carbon Homes programme. A commitment to a set of carbon reduction milestones would serve to effectively galvanise and advance this programme. Similarly, the RTPI understands that the nature of the 'whole house packages' will be dependent on the circumstances of the properties to which they are delivered. However, the RTPI believes that, the provision of clarity regarding what a package will deliver in terms of minimum carbon emissions reductions, would be helpful.

## Delivery

The RTPI regards a community partnership approach to the application and implementation of energy savings measures to be the rational route forward. To ensure coherent, integrated infrastructure delivery it is essential that energy savings initiatives are coordinated within an overall framework of local energy planning by Local Authorities. For example, as the Strategy acknowledges, planning will serve as the mechanism for the identification of where new development can link into or provide inputs to complement energy saving retrofitting programmes. Given the contribution of measures such as those outlined in the CESP consultation towards Local Area Agreement indicators, Local Strategic Partnerships would provide the logical mechanism for the coordination required. To this end the RTPI advises that it would be good practice for Local Authorities to be equipped with their own in-house home energy advice resource and trained domestic energy assessors.

RTPI believes that the option of replacing the supply-led approach to delivery by a single national coordinating body should be favourably considered. This would provide greater coordination and targeting of the package of measures necessary to meet whole house or community needs. It would also ensure a more streamlined form of engagement with Local Authorities and would enable the implementation of the more ambitious energy saving measures. The RTPI recommends the government acts to mandate the formation of a single coordinating body

## Local Energy Plans

The Heat and Energy Strategy attaches a high degree of importance to the key role of Local Authorities in devising spatially sensitive and specific energy plans (HESS para 1.48) and the PPS1 Climate Change Supplement (para. 26) states that planning authorities should have an evidence-based understanding of the local feasibility and potential for renewable and low-carbon technologies, including micro generation, to supply new development in their area.' It is clear that, given the pace of technological development, the implications of this for spatial planning are still evolving in a process to which a number different entities are contributing. The excellent good practice work undertaken by the Planning Advisory Service and the Homes and Communities Agency is applauded, however given the current combination of growing but still small spatial planning expertise in this field, together with an abundance and diversity of good practice material provided by many different agencies, there is ultimately a need to consolidate and fortify this work to establish a clear set of parameters regarding the minimum requirements, format and outputs of a local energy plan, addition to the opportunities to advance beyond this. Plans should be required to meet these criteria in order to demonstrate the provision of a sound evidence base for the Core Strategy and Local Development Framework. Indeed, the more that such plans can be integrated with the Local Development Framework, the better planning will be able to deliver their outcomes. The RTPI is keen to work in partnership with DECC, CLG, PAS and other stakeholders towards this goal.

## District Heating

The RTPI acknowledges the three key roles local government and planning can fulfil with respect to supporting District Heating. Firstly, local government and planning have a role to encourage the creation of networks and co-location by developing appropriate LDF policy and when delivering new development through development management. Secondly, local government and planning have a role to broker commercial arrangements and facilitate infrastructure, such as that developed by Woking Borough Council with its innovative CHP scheme. The RTPI agrees that Local Energy Plans should examine the potential for the creation or expansion of heat and energy networks and would like to see the use of heat mapping to model current and future opportunities become an obligatory component of the local energy plan evidence base at regional and local levels.

The third role of local government, the encouragement of developments both new and existing to connect to existing networks, has proved more difficult. Clear support should be given to local authorities in their efforts to make connection to District Heating and use of the service a condition of development. The RTPI also strongly urges the government to move quickly to devise strong incentives for existing buildings to connect to proposed district heating networks to prevent adverse impacts on commercial viability from the abstention of anchor heat load properties.

The RTPI looks forward to participating and engaging with central government policy makers on the issue of District Heating at the forthcoming Local Authority summit on Community Energy and Heating.

## Regulation of the Existing Building Stock

Like the stakeholders cited in the Strategy, our members have expressed strongly the need for greater action in reducing emissions from existing building stock.

The RTPI supports the principle of energy efficiency improvements for subsequent building works being made a condition of planning consent and some of our members have also suggested that carbon emissions improvements could be made a condition of change of use consents. In the realm of planning in terms of easing regulation on positive emission reduction measures, some of our members have put forward the idea of extending permitted development rights to larger scale renewable and low carbon energy infrastructure in association with non-residential buildings such as schools and offices.

The extension of the scope of building works which require energy efficiency improvements is a sensible measure. Overall there is a need to consider more fundamentally how regulation can work in tandem with the incentive measures contained in initiatives such as the Community Energy Savings Programme.

## National Energy Efficiency Data Framework

The RTPI agrees that it is essential to have an accurate database providing a comprehensive source of information relating to building energy use and performance on the energy efficiency of the existing building stock. The data to be provided through the National Energy Efficiency Data Framework will be invaluable in the provision of baseline information for Local Development Frameworks and for monitoring and evaluating the effectiveness of different policy measures. The RTPI looks forward to this becoming available.

## Economic and Financial Issues

The RTPI recognises that a key element behind the realisation of a low carbon future and is the creation of effective financial instruments to encourage and facilitate use of lower carbon energy and it supports the government's ongoing work in this area. The RTPI also welcomes the contribution played by the initiatives outlined in the Strategy towards the shift to a low carbon industry as providing the key to sustainable economic growth for the UK.

## Skills and Capabilities

The RTPI agrees that the issue of skills capacities and competencies within regional and particularly local government needs to be addressed urgently. Given the pivotal role which has been accorded to planners in the delivery of local energy infrastructure delivery, the allocation of resources to enhance training and skills development in this domain is warranted. The RTPI is focusing on this issue; however, government support will also need to be targeted on this area to ensure planners are properly equipped.

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,



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