



RTPI

mediation of space · making of place

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Carbon Neutrality and Carbon Offsetting Team
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Email: carbonneutrality@decc.gsi.gov.uk

20th May 2009

Dear Sir or Madam,

**RTPI RESPONSE TO CONSULTATION ON THE TERM 'CARBON NEUTRAL':
ITS DEFINITION AND RECOMMENDATIONS FOR GOOD PRACTICE**

Thank you for the opportunity to respond to the above consultation. The Royal Town Planning Institute (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.

Response in Principle

The RTPI acknowledges the need for an appropriate 'kitemark' accreditation for corporate performance in carbon emissions management. The RTPI agrees that this would provide consumers with confidence and help shape investments relating to carbon neutrality. Companies, organisations and products need to have a clear standard to which they can adhere. However, if 'Carbon Neutral' is to be adopted as this standard it needs to be clearly defined, easily understood and comparable, so that the public and consumers can judge performance.

Scope of Definition

The RTPI believes that the definition, based on the GHG protocol, is appropriate and it supports the broad approach outlined in this consultation. However, it is felt that confusion should not be created through references to gradients of minimum and best practice. An appropriate way to address this would be to define performance as Scope 1 Carbon Neutral, Scope 2 Carbon Neutral or Scope 3 Carbon Neutral, ensuring that unless the entity has achieved carbon neutrality with respect to each scope, the performance is qualified.

The RTPI believe emissions reduction must form part of a carbon neutral standard. It is not be acceptable that an entity should be able to achieve the carbon neutral standard solely through measuring emissions and then offsetting, without having implemented measures to reduce emissions. Emissions reductions should be made in absolute rather than relative terms as entities need to manage potential economic growth within this constraint framework.

Regulation and Quality Control

The idea of creating a 3rd party verification body would appear to be the best option to quality control carbon neutral claims. This would combine a degree of flexibility for the particular demands of different sectors, organisations and products, with the necessary credibility for the standard. The verification body should establish initial minimum reduction parameter guidelines for different sectors together with minimum timeframes for assessing and improving performance. Entities should be required to set out timeframes for reductions together with measures to maintain and reduce emission levels and demonstrate efforts made to move from offsetting to absolute emissions reductions.

The RTPI agrees that the 'carbon neutral' standard is a transitional process and the need is to move towards increasing reductions in emissions and decreasing carbon offsetting. The 'carbon neutral' standard should be evaluated periodically to reflect advancements and move towards lower carbon standards.

Green Site Energy Plans

Whilst CLG recently launched its consultation on zero carbon non-domestic buildings, this initiative will not address the need to encourage energy efficient working and business practices, the activities identified within the scope 3 category of the GHG protocol. This consultation refers to a standard for corporate performance. However, the RTPI would like to draw the government's attention to the potential to address this in a spatial context through the use of site-level green energy plans. The success of green travel plans should be replicated in the sphere of energy use and carbon emissions. The initiative should be supported by Green Energy Officers to supply a comparable service to Travel Plan Officers providing the expertise and understanding to help companies work to reduce their energy use and carbon emissions. The creation of this capacity within local authorities would also assist the difficulties faced by planning functions in the monitoring and enforcement of environmental sustainability measures in new development. The RTPI calls on the government to provide a clear policy backing and basis, as was provided for Travel Plans in PPG13, for this initiative.

I trust the above comments are useful.

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

Yours faithfully,



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