



**RTPI**

mediation of space · making of place

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4<sup>th</sup> June 2009

Carbon Reduction Commitment (CRC)  
National Carbon Markets  
Department of Energy and Climate Change  
3, Whitehall Place  
London  
SW1A 2HD

Email response sent to: [crc2009consultation@decc.gsi.gov.uk](mailto:crc2009consultation@decc.gsi.gov.uk)

Dear Sir or Madam,

## **RESPONSE TO CONSULTATION ON THE DRAFT ORDER TO IMPLEMENT THE CARBON REDUCTION COMMITMENT**

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 priority for sustainable development. Its new 'Planning to Live with Climate Change' 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.

The RTPI believes that spatial planning has a key role to play in supporting individuals, organisations and communities to change their behaviour so as to reduce carbon emissions. On behalf of its members the RTPI is also committed to examining and analysing the spatial implications of initiatives outwith the remit of planning policy and legislation.

The RTPI supports the creation of this new mandatory instrument to target non-energy intensive organisations by placing absolute limits on sectors not previously facing a targeted emissions reduction mechanism. Our members have identified the need to address existing development as a key objective for planning and climate change. This emissions trading scheme will contribute to the reduction of the emissions emitted by existing development via a fiscal mechanism.

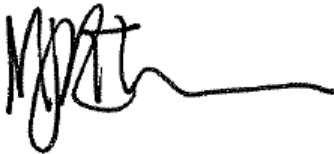
The Government rightfully recognises the importance of stimulating greater awareness of energy use emissions within the senior management of organisations and of encouraging the sharing of best practice throughout a group. The RTPI considers such behaviour change to be an essential element of addressing climate change. The creation of footprint years and reports are excellent means of focusing corporate objectives on managing emissions, whilst the creation of the performance table is an innovative and valuable method of providing public accountability for carbon performance. In addition, the treatment of energy from CHP and Renewables within the CRC scheme is strongly supported and will assist the development of these markets.

RTPI calls upon the government to map out the coverage of its emissions trading schemes through the Carbon Reduction Commitment, Climate Change Agreements, and EU ETS. There is a need for the overall strategy for these schemes to be set out clearly; with the gaps and the difficult-to-reach areas identified. For example, the RTPI notes that transport emissions are not encompassed by the CRC. It is understood that car manufacturers, individual motorists and fuel producers will be dealt with in a review to the ETS system. However, the RTPI would like to emphasise the importance of organisations having a holistic appreciation of their carbon footprints. It is not clear why organisations should be absolved of responsibility for the transport emissions their activities generate. They are more difficult to measure than emissions from fixed point sources, but there is a need to account for them in some form.

The RTPI appreciates the logic behind addressing fixed energy sources at organisation level through one grouped entity to reduce the administrative burden on participants that would be created by submitting returns for each individual site or subsidiary. The Consultation Document explains that CRC targets primarily large non-energy intensive organisations that generally consume large amounts of energy across many small sites with centralised corporate energy management expertise as opposed to the industrial point sources regulated under the EU ETS and CCA systems, which lend themselves to installation or site based approaches. However, the Institute also believes there is a need to investigate workable mechanisms for the management of emissions at site level, without creating an excessive administrative burden. Although unrelated to the CRC the RTPI have drawn the government's attention to the potential to address emissions in a spatial context through the promotion of site-level green energy plans similar to green travel plans.<sup>1</sup> A solution along those lines could potentially serve as one means of plugging the gap and ensuring smaller organisations address their carbon emissions at the site level.

If you require any further assistance, please contact Luke Dickson, Planning Policy Officer on 0207 929 9489 or email [policy@rtpi.org.uk](mailto:policy@rtpi.org.uk).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Matt Thomson', with a long horizontal flourish extending to the right.

Matt Thomson  
Head of Policy and Practice  
Tel: 0207 929 8179

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<sup>1</sup> [RTPI Response to the Consultation on the term 'carbon neutral': its definition and recommendations for good practice](#)