

**RTPI**

mediation of space · making of place

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4th June 2009

Sam Lutterodt
Department of Energy and Climate Change
Climate Change Agreements Team
First Floor
3, Whitehall Place
London
SW1A 2HA

Email response sent to: ccaconsultation@decc.gsi.gov.uk

Dear Sam Lutterodt,

RESPONSE TO CONSULTATION ON THE FORM AND CONTENT OF NEW CLIMATE CHANGE AGREEMENTS

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 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 consumption. 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 welcomes the extension of the system of Climate Change Agreements up to 2017 and the government's general approach to their reform.

RTPI supports the need for targets to be set in absolute rather than relative terms. The potential for relative targets to allow increased emissions if there is an increased throughput, is not acceptable given the urgency and criticality of climate change. The RTPI supports the setting of absolute targets at both sector and target unit level. There is a need for responsibility for the carbon emissions to be accepted and understood at all levels.

The targets at both sector and unit level should be set in terms of carbon emissions. The Government has adopted carbon budgets with targets for reductions in carbon emissions and it is essential that carbon awareness is inculcated in all institutions and individuals. As the consultation document rightly asserts it is necessary to change people's mindset away from energy use and towards the extent of their carbon footprint. In addition, if an integrated approach is to be made to work in addressing climate change, it is essential that there is a common currency and language for the purposes of use and comparison across departments and professional disciplines.

The RTPI agrees that all target units should be required to meet their targets either by direct action or through the purchase of allowances. The Institute supports the idea that the risk management tools under the New Climate Change

Agreements should be confined to carbon trading, rather than the 'fuel supply' or 'relevant constraints' methods.

The RTPI notes the Environment Audit Committee support for proposals to widen the criteria for the inclusion in each carbon reduction scheme to apply to the whole site, 'given the extra progress on energy efficiency which the progress of complying with Climate Change Agreements appears to have driven.' The Consultation Report states that the government is not seeking to change the eligibility criteria for the scheme as it has been designed specifically for energy-intensive industry because of the negative impact the Climate Change Levy might have on the competitiveness of the energy industry as opposed to the non-energy intensive sectors, many of which will be subject to the Carbon Reduction Commitment CRC. However, the RTPI also believes there is a need to investigate workable mechanisms for the management of emissions at site level, without creating an excessive administrative requirement. Although unrelated to CCAs or the CRC, the RTPI have drawn the government's attention to the potential to address emissions from existing developments in a spatial context through the promotion of site-level green energy plans akin to green travel plans¹.

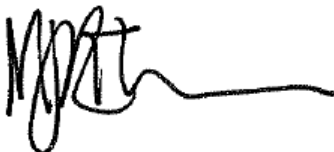
The RTPI believes that it is very important to explore all the possibilities for employing the Climate Change Agreement mechanism to stimulate CHP development to help overcome economic disincentives and allow the full potential of this energy efficient technology to be realized. The RTPI is of the view that the test of viability should be reintroduced and that it is appropriate to adjust targets to support CHP development.

With regard to the government's continuation of a 'light touch' approach applied to Climate Change Agreements operators under the Environmental Permitting (England and Wales) Regulations 2007, the RTPI believes that on an individual site basis the government needs to ensure *all* units covered by Climate Change Agreements meet the basic energy efficiency requirements outlined in paragraph 170.

I trust the above comments are useful.

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

Yours sincerely,

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

Matt Thomson
Head of Policy and Practice
Tel: 0207 929 8178

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