

Introduction

1. The Royal Town Planning Institute (RTPI) very much welcomes the publication of this draft guidance. The RTPI has a membership of over 20,000 spatial planners and Networks and Associations that encompass a wider group of practitioners, politicians and community representatives who concerned with, and affected by, spatial planning.
2. The comments we make below on particular aspects of the draft guidance need to be read within the context of support for the policy approach being taken by Communities and Local Government. The RTPI looks forward to maintaining and increasing the close working relationship that has been established on this issue.
3. In particular, the RTPI is willing to play a role in the dissemination of this guidance and in delivering training and support in order to develop the effectiveness of the practice needed to implement this guidance.
4. The RTPI response covers seven issues which we consider to be significant:
 - The Role of Spatial Planning
 - The Need for Integration
 - The Primacy of Climate Change
 - The Status of the Guidance
 - The Relationship to Building Regulations
 - Skills and Resources; and
 - Existing DevelopmentIt then puts forward some more detailed comments on specific paragraphs in the draft before raising particular points under each of the Consultation Questions, where relevant.

The Role of Spatial Planning

5. The RTPI welcomes the recognition in the draft guidance that spatial planning is at the heart of both mitigating the underlying causes of climate change and adapting to its effects. It would be worth the final guidance pointing out that spatial planning is one of the few activities that contribute significantly to both mitigation and adaptation.
6. Given this, we feel that the opening statement¹ could to be strengthened in this respect. It needs to reflect the fact that the Stern Report named planning as one of four key policy tools with which Government should address climate change². It is also worth bearing in mind that the Kyoto Agreement itself pointed to the potential of spatial planning³. It would be worth re-inforcing the message in the final Guidance by referring to both these facts and a summary of the recently issued Stern Review would be a welcome addition to the appendices of this consultation document.
7. The overall importance of the messages in the draft PPS is clear. A rigorous reading of the criteria for, for example, allocating land for development (p.18) would mean a virtual end to employment sites at motorway junctions, a ban on almost all out of town shopping, no further football grounds moving to edge of town sites, an end to NHS policies that resulted in hospitals in remoter locations and a judgement of major infrastructure, including airport development against these criteria.

8. It is worth stating that there can be a tendency to consider that the key role of planning is in focussing on individual developments through development management processes. The RTPI particularly welcome the emphasis in the draft on issues such as urban form, density and integration of transport. This is the role that planning can, and should, play best and, if anything, this role should be brought to the fore to an even greater extent in the final guidance. Studies such as that by the World Wildlife Fund of the Thames Gateway demonstrate that real effects on, for example, carbon footprints are only achieved when a strategic approach is taken to urban form, density, mixed use, transport accessibility and nodes and green space strategies. This needs to be made clear in the policy guidance and, importantly, in the accompanying Practice Guide.
9. In this case, the accompanying Practice Guide will take on a particular importance as there is the clear need to demonstrate how the objectives set out in the PPS can be achieved through practice.
10. In this respect we do, however, recognise and have sympathy with the views expressed in the Barker Land Use Review⁴ and would not expect the planning system and its operation to bear an undue burden of responsibility. But this does not conflict with an approach that seeks to identify the unique role of planning and to equip it to fulfil that role.
11. In some areas, the draft PPS is stated in too vague terms to aid planners in identifying the key roles that are not only central to the remit of spatial planning but also whose outcomes are within the control of the planning system. For example, how can planners be expected to ensure a 'significant proportion' of renewable energy and will this vary regionally and locally across the country according to particular circumstances?

The Need for Integration

12. If the foregoing analysis is true (and it is assumed the CLG intends that this guidance is to be read rigorously), then this policy approach does not need implementing simply through planning strategies and decisions but must be supported firmly through other governmental statements and policies and through the decisions of the Planning Inspectorate.
13. It is of key importance to ensure that this approach is adopted in the spatial and investment strategies of other bodies – notably Regional Economic Strategies, health and education authority plans, the planning of major physical infrastructure including airports, ports and roads, and the formation of national policy for energy and water. If this is not achieved, then the spatial planning system could end up in the role of 'policing' the policies of others to seek to make them conform to the approaches and criteria set out in PPS1a rather than such bodies and agencies only coming forward with proposals that already conform to the criteria set out in the PPS and to the Government's wider policies on climate change..
14. In calling for such a step-change in integration, the RTPI recognises that spatial planning needs to get its own house in order. For example at present all the Regional Planning Bodies are developing slightly different policies on climate change, including policies on, for example, on-site renewables, water saving, sustainable urban drainage systems and others. As we make clear later in this response, the RTPI feels that one of the roles of planning is to innovate in policy approaches but innovation does not equate with inventing particular wheels in a variety of different designs. There is a case for the Government to be more directive in this - leaving scope for local interpretation, but making clear the immutables through the final PPS.

15. Having said this, there is the need to recognise the variations in climate and weather patterns across the UK. While there is an underlying tone in the document about hotter summers (perhaps still more a feature of the South East than elsewhere!), it is equally important to take account of those warmer, wetter and windier winters which are perhaps more of a feature of other more northern areas. For example, the first bullet point in para. 35 tends to assume that sunnier, hotter weather will be the only result of global warming whereas landform and orientation need to take account of windier and wetter conditions in some areas. Similarly, public and private open space must offer not only an accessible choice of shade and shelter, but also of dry conditions underfoot.

The Primacy of Climate Change

16. In relation to Regional Spatial Strategies, the draft PPS states that 'Climate change should be a key and integrating theme ... and be addressed in conjunction with the economic, social and environmental concerns ...'. There may be some indication in this statement and in other parts of the draft – for example, the statement in para. 22 bringing together landscape and renewal energy considerations – that climate change considerations may have some form of primacy over the traditional elements of sustainability (economy, social, and environment).
17. It is understandable – given the statement in the draft PPS that the Government believes that climate change is the greatest long term challenge facing the world today' – that the CLG may wish considerations relating to this issue to override other considerations. If this is the case, then the final PPS needs to make this clear, this it is not the case then this needs, equally, to be made clear. Such a change in the existing approach whereby planning seeks to address all the components of sustainable development equally would have a very significant affect of planning practice.

The Status of the Guidance

18. The RTPI welcomes the fact that this policy statement has been produced as a supplement to PPS1. This reinforces its importance and strength as underlying all other planning policy statements. There is, however, the need to decide whether it should remain a supplement or whether its messages should be embedded in a revised PPS1. As the introduction to the draft guidance states, 'the need to take steps to mitigate and adapt to climate change is not a new requirement' for planning. PPS1 already carries strong messages about climate change⁵ and it may further strengthen the centrality of this issue to import the key policy content from PPS1a into PPS1 – although this needs to be done in a way that does not cause delay in developing local planning policies through Development Plan Documents.
19. The recognition that here is spatial planning's contribution to reducing the impact of climate change, is an important one and one that identifies a strong integrative approach with other policy and research documents (paras.1.2/1.3/1.6). There is a clear need to re-visit existing national policy to ensure not only that it is conformity with PPS1a but takes forward and build on the policy stance in PPS1a. The statement in the draft covering its relationship with other PPSs⁶ is helpful (although it may be somewhat confusing to state that conflict with other guidance is 'deliberate') but it does not cover those instances where national policy is silent on overall policy on climate change.
20. One example is the fitting of measures to reduce heat loss or to enable micro generation in listed and historic buildings. There is a conflict between policy – and legislation - on such buildings and the policy thrust of PPS1a and it is not sufficient in

such cases to state that PPS1a will prevail. There is the real need to re-visit other guidance to ensure that it is playing its full role.

21. Finally, the guidance should not make generalised statements of effective practice where these apply to all policy issues. These include the statements in para 38 on planning conditions and obligations and those in the next paragraph on compliance and enforcement. Similarly, it is not clear how the guidance on Monitoring and review (Paragraphs 40-42) differs from overall guidance on Annual Monitoring Reports. The inclusion of generic advice tends to reduce the impact of the guidance and is only useful if it brings in new advice on how existing parts of the system need to be used specifically in different ways to deal with the issue of climate change.

The Relationship to Building Regulations

22. The RTPI is pleased that the draft Guidance allows for some innovation by local authorities in setting standards for sustainable buildings. We do fully recognise the difficulties arising from different local planning authorities setting a variety of different standards than those imposed, or to be imposed, through the Building Regulations. We acknowledge that this can have a harmful effect where the development industry is seeking to achieve economies of scale in their design and procurement processes.
23. However, there must be scope for policies which push the boundaries of action on climate change. The 'Merton Rule' to which the RTPI has recently awarded the overall prize in the 2006 Planning Awards, was ahead of its time and encouraged not only other authorities to examine ways in which they might address emissions through planning policy but also encouraged developers to come up with innovative ways of meeting this development control requirement. PPS1a needs to encourage such innovation – particularly, as suggested in the draft, in areas with the potential for achieving large build rates.
24. The final guidance could, therefore, play a larger role in setting out the criteria against which local planning authorities should judge whether to implement higher standards.

Skills and Resources

25. While commending the urgency with which CLG have been able to produce this document, the result has inevitably resulted in the methodology (for example, for managing the performance on carbon emissions) having yet to be fully developed. This will clearly influence the speed at which the policy can be effectively delivered and implemented and it is important that government encourages all parties to work together closely and quickly in order to improve on the skeletal process outlined here.
26. There is equally clearly the need to further develop the particular skills and knowledge of those involved in spatial planning who will be addressing this issue. This is a complex and technical field and the CLG working with others; such as the ASC, PAS and I&DeA and universities, needs to demonstrate a lead in providing information, advice and training for all those involved, including elected members. The RTPI and its partners are very willing to be involved in such an initiative.
27. There is a strong feeling, in reading the document, that the skills and expertise on climate change would be better placed at the regional level. From here the regions can provide support for updating local planning authorities where such expertise may be in much shorter supply (para.12).

Existing Development

28. While accepting that the emphasis here is on new residential, commercial or industrial development (para.22), the document should recognise that climate change is most significantly influenced by the vast majority of existing buildings and by conversions. Planning policy must address the existing stock through, for example, incorporating local energy saving strategies into development planning processes, in focussing on resources available to take action within the existing stock when meeting the requirement to 'have regard to the resources likely to be available for implementing the proposals in the development plan document'; in setting out objectives for public transport availability; in addressing the re-modelling of road layouts and setting out clear policies on the intensification of development.
29. The role of spatial planning needs to extend more into existing stock and the final version of this guidance can play a significant role in encouraging this.

More Detailed Comments

Paragraph 1.5

30. We feel that it may be time to stop characterising the new system and, in particular PPSs as being 'new'.

Paragraph 1.14

31. Whilst we fully support the need to build the guidance into the development planning process as swiftly as possible, care must be taken so that any wording in the final PPS cannot be read as an encouragement for delay. Ultimately, if sustainability appraisal demonstrates that plan policies are consistent with PPS 1, they should also be broadly consistent with this proposed PPS 1 Supplement. Further, more detailed work at local level on planning and climate change can be done once the core strategy is in place.

Paragraph 6

32. It needs to be recognised that there may well be conflicts between reflecting community interests and those of business and commerce and therefore, that the achievement of all objectives set out in this paragraph cannot be achieved without difficulty.

Paragraph 7

33. There is the need for urgent work on how the 'appropriate indicators' to be identified and selected. The RTPI is already commissioning work in partnership with CLG to study the efficacy of outcome based indicators and would be pleased to use the emerging findings of this work to inform other work on climate change indicators.

Paragraph 19

34. We would add landscapes and townscapes to the bullet point on biodiversity: 'the effect of development on biodiversity, landscapes, townscapes and their capacity for adaptation, having regards to likely changes in the local climate'.

35. We would also draw attention not only to the urban cooling effect of open space, but also to the need for it to accommodate warm, wet and windy conditions.

Paragraph 20

36. While broadly agreeing with statements on those sites performing poorly against the criteria set out in para.19, they should be subject to both mitigation and adaptation considerations before a final decision is taken.

Paragraph 22

37. As far as energy supply is concerned, the main bullet points would carry more weight if they were illustrated by examples. What does the first bullet point mean in practice? Does the second bullet point imply allocating sites for wind farms, biomass crops, and water powered energy such as adapted water mills, etc? Renewable energy proposals will vary in scale depending whether the location is heavily urban or deeply rural and on the size of the developments being proposed. Renewable energy should not simply be confined to newly allocated sites in development plan documents. Some forms of renewable energy are better located in particular locations, although as a general rule the closer they are to the market they are supplying the more efficient they will be.
38. We would query any implication in the draft that landscape and townscape may be sacrificed in the interests of renewable energy. It would be more positive simply to indicate that in particular landscapes and townscapes, some forms of renewable energy would have a more acceptable impact than others. As a matter of some priority, planners need to have guidance to hand that will clarify the landscape and townscape impacts of the varying forms of renewable energy (including their cumulative impact). This may help to address the perceived problem that the PPS wording may be designed to address – that of authorities imposing higher than necessary landscape protection policies purely in order to prevent the development of renewable energy schemes such as windfarms

Paragraph 27

39. If paragraph 27 is to have value within this PPS then it should re-iterate the planned nature of the role in planning in addressing climate change. Its current wording does not add anything to advice in other PPS.

Paragraph 34

40. There are issues of scale that need to be clarified in the final PPS. *Paragraph 34* specifically refers to ‘*substantial new development*’, but *paragraph 35* has no similar qualification. While the environmental performance criteria (*paragraph 35*) are entirely reasonable for large scale development - such as that that might be the subject of an SPD masterplan – they are hardly appropriate for single buildings or small scale development.

Paragraph 35

41. Whilst we can understand the need for Design and Access Statements to cover a range of aspects of the development, care should be taken not to require such statements, required under planning legislation to commit to action that may only be approved outside the planning system - notably to demonstrate something that is submitted for approval under the Building Regulations.
42. We would add landscape and townscape to bullet point 5 (‘ensure new development does not create adverse local environmental conditions for people or undermine biodiversity, landscape or townscape’).

Annex E

43. The glossary in Annex E is essential and should perhaps be placed in a more prominent position at the front of the document (especially E8 and E14).

Consultation Questions

Q.1 *There is an urgent need for action on climate change and we consider that, used positively, spatial planning has a pivotal and significant role in addressing this challenge. We will provide practice guidance to help implement the planning policy for climate change set out in the PPS. Read together, and as part of the wider package of action being taken forward by the Department in Building a Greener Future to help deliver the Government's ambition of achieving zero carbon development, will the new policy and proposed practice guidance secure planning strategies that deliver reductions in emissions and shape sustainable communities that are resilient to the climate change now accepted as inevitable?*

44. Spatial planning does need to rise to the challenges presented by the draft guidance and the RTPi supports the need to do this and to recognise the vital role that planning plays in this. However, as stated above, it must be recognised that planning is only one cog in the wider wheel and both partnership and cooperation will be essential.

Q.2 *The PPS sets out Key Planning Objectives and Decision-making principles for the preparation and delivery of spatial strategies by regional planning bodies and all planning authorities. Do you agree with these?*

45. Subject the detailed comments made elsewhere in this response, the RTPi endorses the objectives and principles set out in the guidance. This response has, however, set out the implications for new development if the guidance is adopted rigorously and we would question whether all parts of Government are willing to support such a change in what is considered good and bad development.

Q.3 *It is proposed that climate considerations should be a key and integrating theme of the regional spatial strategy (RSS) and be addressed in conjunction with the economic, social and environmental concerns that together inform the overall spatial strategy and its components. Do you agree?*

46. Please see out comments in paras. 16 and 17, above.

Q.4a *The PPS expects regional planning bodies (RPBs) to consider the likely performance of RSS on mitigating climate change. In doing so, the PPS makes clear that this should be a key part of the sustainability appraisal, which should be used to identify and evaluate possible tensions or inconsistencies between current, or likely future, baseline conditions and securing RSS in line with the Key Planning Objectives in the PPS. Do you agree with the suggested approach?*

Q.4b *The PPS encourages RPBs, as part of their approach to managing performance on carbon emissions, to produce regional trajectories, to be set out in RSS, for the expected carbon performance of new residential and commercial development. Do you agree with the suggested approach?*

47. Mitigating climate change should be a key part of the sustainability appraisal within the RSS, and regional trajectory work for new development will form an important part of the workload. The availability of resources to help provide the necessary skills and expertise is important, especially if the regions are to become the principal source of expertise on the issue of climate change.

Q.5 *We propose an approach to the identification and allocation of sites and areas for development in which priority should be given to those likely to perform well against the criteria set out in paragraph 19, and that those that perform badly should not normally be considered for allocation for new development. Do you agree with the suggested approach?*

48. Yes, but see our response to Q. 2, above. In addition, we consider that a rigorous testing of the application in respect of both mitigation and adaptation should be considered before sites are rejected.

Q.6 *The PPS expects local planning authorities to assess their area's potential for accommodating renewable and low-carbon technologies, including for micro renewables to be secured in new residential, commercial or industrial development.*

Q.6a *Do you agree that local planning authorities should consider allocating sites for supplying renewable and/or low-carbon energy and supporting infrastructure, taking care to avoid stifling innovation?*

49. See earlier comments

Q.6b *Do you agree that local planning authorities should ensure that a significant proportion of the energy supply of substantial new development is gained on-site and renewably and/or from a decentralised, renewable or low-carbon, energy supply?*

50. Yes, depending on what that significant proportion is. There is the need for greater understanding as to the relative merits of on-site and decentralised supplies.

Q.6c *Do you agree with the approach for setting out, in a development plan document, a significant proportion of the energy supply of substantial new development to be gained on-site and renewably and/or from a decentralised, renewable or low-carbon, energy supply?*

51 See earlier comments

Q.6d *Do you agree that in the interim period before "a significant proportion" is tested and defined through the preparation and adoption of a development plan document a standard of 10% should be applied?*

52. Overall, we are concerned about skills availability among local planning staff, which in turn is influenced by the availability of resources. The return to a more local provision of energy is an interesting one (akin to the days of local gas and electricity provision), but the issue needs much more consideration if energy requirements are to be met increasingly from local sources, the specific sites of which are allocated in the development plan. Can planners allocate areas for biomass cultivation? Perhaps a pilot scheme might be considered here? How can planners ensure local energy provision without working in close partnership with energy providers? The principle of local provision is fine for development plans, but is a 'significant proportion' likely to be different across the country? Should we not gradually increase the figure over time, with 10 per cent (albeit seemingly a low figure) used in the first instance?

Q.7 *The PPS forms part of a wider package of action being taken forward by the Department to help deliver the Government's ambition of achieving zero carbon development. This includes the Code for Sustainable Homes and a consultation document, Building a Greener Future, which sets out how planning, Building Regulations and the Code for Sustainable Homes can drive change, innovations and deliver improvements to the environment.*

Q.7a *Do you agree that, for the reasons set out in Building a Greener Future, there should be a national strategy for regulating the emissions from buildings supported by local promotion of renewable and low-carbon energy supply?*

Q.7b *Does the framework that we describe give adequate room to authorities and developers to make best use of the opportunities available at different spatial levels, for example district heating and district cooling?*

53. An important point - on balance the strategy should be national, with regional and local flexibility to implement it as best befits particular areas. It remains unclear whether each region will have or be given a target, with local flexibility over how it is to be reached.

Q.8 Paragraph 35 of the PPS expects planning authorities to consider the environmental performance of proposed development, taking particular account of the climate the development is likely to experience over its expected lifetime. Do you agree with this approach?

54. Yes

Q.9 We consider effective monitoring and review is essential in securing responsive action to tackle climate change. Do you agree that the expected annual monitoring should include outcome performance against the carbon performance trajectories or other yardsticks for identifying trends in performance, and renewables targets set in RSS?

55. It is difficult to be precise over this, with the process still evolving, but monitoring and review are essential. Do planners have the skills for this work or might some form of independent assessment be considered?

Q.10 Do you consider the proposed scope of the practice guide (at Part 3) covers all the topics it needs to? If not, what is missing, and why? Does the proposed scope of the practice guide include topics which don't need to be covered? If so which, and why?

56. The draft framework of the accompanying practice guide is helpful, particularly part 1. In view of the overlap between the guidance and the proposed content of It would be better to see a few worked examples included here (updated as good practice permits), together with named regional contacts that planners can reach to help them further. It can often be more useful to have such contacts rather than plough through technical guidance that can be difficult to fully understand.

Q.11 The Partial RIA (at Part 4) sets out the likely benefits and costs of the PPS, assessing two options, (i) the "do nothing" option and (ii) implementation of the PPS. Are these options viable? Would you add to/change the disadvantages/advantages of each? Are there any other options that should be considered?

57. It is difficult to consider a 'do nothing' option except as a measure of the need to act on the issue in a considered and strategically planned way. Should planners be the catalysts around which integrated action is taken?

Q.12 The Partial RIA sets out potential impacts by stakeholder. Would you add to/change the impacts for each group? Are any stakeholders missing from the list?

Q.13 The Partial RIA sets out the likely benefits and costs of the PPS. Do you agree with assumptions made? If not, it would be helpful if you could set out why not and provide any quantifiable evidence available to you on benefits and costs.

58. The partial regulatory impact assessment in part 4 is helpful and informative. Of particular note are paras. 6 and 7 which show planning as complementary to Building Regulations and appliance product standards; paras. 8, 9 and 10 which indicate that the PPS is not intended to specifically reduce development overall; paras. 15 and 16 on the costs of climate change; paras. 23 and 26 on options; paras. 33 and 34 on vulnerable groups; paras. 38, 39 and 40 covering the impacts on stakeholders; paras.44, 48, 49 on the costs to local and regional planning authorities; paras. 56 and 57 on the costs of renewable versus conventional energy; paras.83, 84 on rural impacts which recognise that there may be less development brought forward in some rural locations.

59. It would be helpful to add 'land managers' to the list of stakeholders, alongside landowners.

Notes and References

- 1 'Used positively, spatial planning has a pivotal and significant role ...'.
- 2 'Governments have a role in providing a policy framework There are four key areas: High-quality climate information and tools for risk management, Land-use planning and performance standards, Governments can contribute through long-term policies for climate-sensitive public goods, A financial safety net may be required for the poorest in society.' Sir Nicholas Stern, *The Economics of Climate Change*, HM Treasury, 2006
- 3 Article 10
'(b) Formulate, implement, publish and regularly update national and, where appropriate, regional programmes containing measures to mitigate climate change and measures to facilitate adequate adaptation to climate change:
(i) Such programmes would, *inter alia*, concern the energy, transport and industry sectors as well as agriculture, forestry and waste management. Furthermore, adaptation technologies and methods for improving spatial planning would improve adaptation to climate change;'
- 4 'There is no doubt that climate change is one of the greatest challenges facing public policy makers today. Ensuring that the planning system plays its role in helping with mitigation and adaptation is therefore an important priority. ... it is important that the planning system is not asked to bear a disproportionate weight of the overall approach to this issue. ...
- 5 Key Principles, in paragraph 13,
'The following key principles should be applied to ensure that development plans and decisions taken on planning applications contribute to the delivery of sustainable development:
(i) Development plans should ensure that sustainable development is pursued in an integrated manner, in line with the principles of sustainable development set out in the UK strategy. Regional planning bodies and local planning authorities should ensure that development plans promote outcomes in which environmental, economic and social objectives are achieved together over time.
(ii) Regional planning bodies and local planning authorities should ensure that development plans contribute to global sustainability by addressing the causes and potential impacts of climate change – through policies which reduce energy use, reduce emissions (for example, by encouraging patterns of development which reduce the need to travel by private car, or reduce the impact of moving freight), promote the development of renewable energy resources, and take climate change impacts into account in the location and design of development.'
- 6 '*Planning and Climate Change* does not assemble all national planning policy relevant or applicable to climate change and should be read alongside the national PPS/G series. Where there is any difference in emphasis on climate change between the policies in this PPS and others in the national series, this is intentional and this PPS should take precedence.'