

RTPI Cymru



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2nd October 2009

Climate Change and Water Division
Welsh Assembly Government
Cathays Park
Cardiff
CF10 3NQ

Dear Sir / Madam

Climate Change Strategy – Programme of Action Consultation

The Royal Town Planning Institute is a membership organisation representing over 23,000 spatial planners. It exists to advance the science and art of town planning for the benefit of the public. RTPI Cymru is the Welsh arm of the RTPI operating in Wales.

RTPI Cymru is pleased to submit a response to the Assembly Government's Programme of Action consultation for its Climate Change Strategy.

The RTPI recognises the need to address the urgent issue of climate change and has in response published its Seven Commitments to Climate Change.

I trust you find RTPI Cymru's comments helpful but please do not hesitate to contact me should you require any further clarification. RTPI Cymru has no objection to these comments being made public.

Yours sincerely,

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Climate Change Strategy – Programme of Action Consultation: Consultation questions

Question 1: Do you agree with the broad focus of Assembly Government action as outlined above?

Setting the Action Plan within the context of the Wales' High Level policy, as well as the UK and European context is valid and is supported. RTPI Cymru welcomes the programme and the profile which the Assembly Government is giving to climate change issues.

Whilst we agree with the broad focus of the actions, there is the question of emphasising the seriousness of the situation to stakeholders, giving some feel for the priorities, and a better account of the links between and with other policy priorities. Given the seriousness of the situation we wonder if this is presented forcefully enough in the document; in comparison for example to the UK Transition Plan.

Our representative at the Consultation event in Cardiff noted the introductory remarks of the Director General for the Department who noted the bleakness of the prognosis and the need to grasp the adaptation agenda as an imperative and the importance of engaging with behavioural change. He noted the need to reach beyond stakeholder networks to families and individuals.

RTPI Cymru also believes that the programme of action could go further. It is also felt that there is activity which the Assembly Government is undertaking, for example within rail transport policy, which is not included.

A list in an Annex, of the benefits which could be achieved by individual actions, providing a tool to enable a comparison to prioritising activity to achieve carbon reduction.

Question 2: What do you recognise as your contribution to tackling the causes and consequences of climate change?

The RTPI is the body representing professional town and country planners in the UK and Ireland and beyond working in the spatial planning field. In addition, given its charitable status the RTPI has a responsibility to campaign for a planning system which is in the public good. Both of these factors lead us to campaign for good planning policy and systems in which to implement this policy. The RTPI has recently (June 2009) launched its Seven Commitments to Planning to Live with Climate Change which sets out the RTPI's position with regard to climate change and what it, and its members, should do. This in effect means climate change will be a major underpinning factor in advice the Institute gives to its members, as well as the action it takes. An Action Plan is also being developed. Our Seven Commitments are that we will:

- 1 Promote behavioural change
- 2 Adapt existing places
- 3 Work towards responsive legislation and policies
- 4 Improve current practice
- 5 Celebrate best practice
- 6 Compile a compendium of best practice
- 7 Develop climate change education and skills

The Planning System has an important and practical role in supporting mitigation and adaptation. It does this through planning policy and the provisions of the development plan. Both are important instruments in supporting this Strategy. Two major considerations are the legal priority given to development plans (LDPs in Wales) and the framework they provide for securing engagement by the general public; both aspects can provide a practical way to assist elements of the Strategy.

Question 3: How can the Assembly Government or others enable you to maximise your contribution to tackling the causes and consequences of climate change?

The RTPI welcomes joint working with those with an interest in spatial planning. There is a real need to encourage cross professional working, for example in the transport policy area, to address climate change issues. Pooling resources, in their widest sense, and coordinating effort is imperative.

RTPI Cymru has experience of organising and delivering training tackling specific issues, for example with funding from the Planning Division, an intensive training programme has been developed and delivered to officers and members in local planning authorities, the Planning Inspectorate and was opened up to a wider audience, on the new package of planning measures to tackle climate change and achieve sustainable buildings during 2009. Further Assembly Government funding support to develop other programmes addressing a variety of climate change issues within spatial planning would assist in widening such a programme.

Ensuring that climate change issues and considerations are mainstreamed in everyday work and living is essential, and ensuring that it does not develop into a standalone specialism must be a priority.

There has been a growth in the number of climate change initiatives and groups, stretching the ability to be involved effectively. The further introduction of groups and initiatives must be carefully managed. In addition there must be sufficient resources available to support the roll out of the various proposals – not just in terms of funding, but also in terms of specialist knowledge e.g. business advisers trained appropriately, so that climate change messages are not just given as lip service.

Question 4: Do you agree with our proposed approach to ensuring delivery of the climate change strategy that emerges from this consultation process? Are there ways in which the approach could be strengthened?

RTPI Cymru particularly welcomes the acknowledgment of the need for cross-policy working. The strategy is enabling which is supported; however the Assembly Government needs to also show direction and ensure compliance with the policy. An example of this is illustrated by the new sustainable buildings planning policy published in June.

Promotion of sustainable places is missing from the strategy. More emphasis needs to be made with regard to transport efficiency and the relationship with the location of development, particularly in urban and semi-urban areas.

Question 5: Do you agree our proposed approach to developing a comprehensive approach to promote behaviour change or specific proposed activities?

We support the importance of instigating behavioural change - it is fundamental and perhaps underplayed when compared with the relatively more focused measures on energy where the major elements, particularly in relation to property, are subject to a detailed regime of demand management with defined timetables. You rightly identify the challenges to securing buy-in at levels where it really matters - "everyone in Wales". The problem of engagement is a perennial issue in planning where opposition and nimbism have had to be overcome. More positively people are used to the planning system consulting and, in certain circumstances, this well understood process provides a platform to engage with people. The development plan is one of the few plans which a local authority has a requirement to produce.

Increasingly research indicates that top down strategies do not change attitudes. The impression given in this section is still overall top down. The real challenge is to use modern marketing tools – which recognise the importance of community based approaches-influencers and networkers. Studies of the gestation of exemplar sustainable communities in Europe, Reisesfeld and Freiburg for example, have focused on relationships – friends, family and colleagues.

Question 6: What do you recognise as the contribution you could make to promoting behaviour change? What support or activities would enable you to maximise your contribution to promoting behaviour change?

The challenges faced in introducing strategies for behavioural change are similar to the challenges faced in designing participation strategies for development plans. Those plans themselves do increasingly require behaviour change e.g. modal shift to public transport. Introducing new content and required information and planning guidance can be factored into the plan process. Some of the potential detail is described in answer to other questions.

Ensuring that planners are effectively equipped with the knowledge and understanding they need to adopt climate change practices and are able to explain this to third parties e.g. community groups and developers and their agents, that they are engaged with.

There is also a need to ensure that Planning Authority Members are briefed on these issues and understand the effects of climate change corporately. Widely embedding the policy is essential.

Question 7: Are there ways in which we can strengthen the quantification of proposals contained in this consultation? If so, how?

There is currently no method for measuring the impact of policies and proposals in Local Development Plans (LDPs). An example of what could be achieved is the Environment Agency's Flood Maps, where development proposals can be fed into a model which illustrates the impact of development on flood risk. Such a tool would provide a way of testing and measuring impacts and could help inform the decision making process.

Question 8: Do you agree with the proposals for action in transport? Are there any major barriers to delivery?

The proposals are supported. However it is considered that the proposals are modest and do not give justice to the scale of the issues and challenges.

The major barriers to delivery are a lack of funding and a resistance to change of behaviour by users. Targeted marketing campaigns will be essential to encourage change, supported by effective services.

It is not considered that sustainable travel towns require piloting in Wales; there is sufficient evidence from the pilots conducted in England. RTPI Cymru also believes that all towns in Wales need to be targeted for this.

Action D on pg 18 is supported, however, this should be widened from cities to towns and piloted in other areas.

Question 9: Are there other key actions that we should be taking in relation to transport? If so what, what would it cost and what level of greenhouse gas emission reduction savings would it generate?

There needs to be further investment in rail for longer distance travel in Wales. Further enhancement and flexibility of the long distance rail routes in Wales need to be made to encourage business use. This is both in terms of the infrastructure and the services provided.

There may be a benefit in providing limited road investment in remote rural areas only accessible by private car, to ensure efficient use of fuel.

Question 10: What are you doing to help reduce emissions from transport? What would help you do more or enable you to start contributing to emission reduction from transport?

It is widely acknowledged that transport is one of the most intractable problems in securing emissions reductions. Planning policy already attempts to influence reductions in car use and modal shift to public transport. Policy and provisions in plans could be strengthened, providing it was realistic. Various zonal proposals have been attempted in the past, some embedded in the development plan, others outside. The most radical, congestion charging and road pricing, will require renewed attention on the basis of joined up land use / transport strategies and buy-in by local government / business, and also renewed National level guidance.

The limited approach to Sustainable Travel Towns is too tentative. Modest policy measures - parking standards or other zonal policy areas e.g. as in the Newport UDP-Transport Development Areas, can be replicated. Creative use of planning agreements and the Community Infrastructure Levy (CIL), if implemented, can underpin transport innovations but requires a buoyant land market under the current economic model.

RTPI Cymru's Management Board and Policy and Research Forum hold their quarterly meetings in locations accessible by all-Wales public transport, as our members are spread across Wales. Our major events, such as the Wales Planning Conference and our Spring Conference, are held in locations favourably accessible by public transport e.g. Cardiff centre and Llandudno. We avoid using motorway junction venues wherever possible.

The RTPI's travel reimbursement policy to staff and volunteers favours the use of public transport.

The RTPI in developing seminar / conference programmes for those involved in spatial planning seeks to embed climate change issues into these. In addition, its responses to policy consultations etc. raises climate change factors where required.

Question 11: Have we identified the big challenges for emission reduction in transport?

Rural transport issues have not been addressed. Consideration of rolling out demand responsive transport in rural areas should be given, as demonstrated in Carmarthenshire.

Other than reference to the RTFO's action, there is no mention of the use of renewables in transport.

Question 12: How do you think these challenges in relation to transport could be addressed?

The location of any new development is a key consideration in reducing private car transport.

Targeting infrastructure spend to public transport provision, coupled with an improvement in public transport services – reliability, flexibility, comfort, customer focus, and affordability.

Question 13: Do you agree with the proposals for action in business? Are there any major barriers to delivery?

Whilst many boardroom approaches to greening business is laudable, this often does not translate to practice on the shop floor; corporate social responsibility needs to be effectively embedded throughout a company.

Question 14: Are there other key actions that we should be taking in relation to business? If so what, what would it cost and what level of greenhouse gas emission reduction savings would it generate?

Advice and information to companies of the impact of their practices and purchasing choices on climate change, including a demonstration of the economic impact of these choices, both to their business, the local / Welsh / UK economy and the climate change costs to society as a whole, as well as to their individual business.

Question 15: What are you doing to help reduce emissions from business? What would help you do more or enable you to start contributing to emission reduction from business?

The RTPI in developing seminar / conference programmes for those involved in spatial planning seeks to embed climate change issues into these.

Question 16: Have we identified the big challenges for emission reduction in business?

The focus appears to be on manufacturing and encouraging businesses to take advantage of new green technologies. This is an important area of work. However all sectors of the business community need to be included, retail should be a key sector mentioned – considering their sourcing strategies, business location and waste generation etc.

Question 17: How do you think these challenges in relation to business could be addressed?

Our response under question 14 provides a suggestion.

Question 18: Do you agree with the proposals for action in the residential sector? Are there any major barriers to delivery?

The proposals are supported. Planning is recognised as one of the main levers in supporting change. In the recent MIPPS on Sustainable Buildings and the draft TAN 22, there are already in place measures for securing reduced energy demand and carbon emissions. Certain teething problems have been anticipated in the certification process (Code for Sustainable Homes and BREEAM) but progressively this will be more a routine matter. But this applies only to new development.

The Assembly Government is funding the WHQS for existing social housing. But the major problem is existing private housing. There are already a number of potential funding streams to assist individual households as described in the consultation.

In England, a well known policy instrument is the Merton Rule which requires a percentage of renewable energy in development proposals, but there is a consensus that planning must move beyond this, because it is being assumed that this is enough and because in certain respects it is being seen as counterproductive through focus only on renewables. The Wales approach of the energy hierarchy is a more appropriate approach, with the initial focus on reducing energy use.

The Consultation notes that the major levers are land use planning, Welsh Assembly Government investment in housing, communication and behaviour change; The National Housing Strategy is referred to as linked to National the Energy Efficiency and Savings Plan-seeking to help communities to work together. Existing initiatives are described in Annex C. We have not had the opportunity to review the detail.

But as we interpret the CERT and other provisions, the principal barrier appears to be dealing with existing homes-and capitalising on the opportunity CERT proposals provide to produce behaviour change.

There is evidence, for instance from the housing renewal areas - under present and former legislation, that an area based approach is practically and economically to be preferred.

However, although there is provision in planning legislation to define action areas this is very general and the present planning policy specifically directed at climate change as set out in MIPPS 1/09, is at a tentative stage, and needs to be further promoted and strengthened. Its effective application at the local level will be crucial for its success.

The Consultation Proposed Actions 9 and 10 are supported but need to be developed through a comprehensive approach which reconciles housing and planning powers with the responsibilities and obligations under Climate Change Legislation. RTPI Cymru would be pleased to assist in any task and finish actions to facilitate a review of the potential.

As noted informed discussion in England is moving beyond the Merton Rule to more comprehensive requirements, in Wales the advent of TAN22 might engender a similar impression of 'Job Done'. Instead, it must be seen as a start.

One of the most basic ways planning facilitates action is through surveys and information – the evidence base – which supports the development plan. Some authorities in England are looking at Energy Opportunities Plans, with the aim to identify areas which support broad groups of technologies or infrastructure- information such as

opportunities for wind, biomass, heat densities, public sector buildings, waste facilities etc. By contrast the MIPPS policy relates only to site allocation.

The aim is to inform wider strategies and investment decisions of stakeholders besides community engagement in what presently is a bewildering array of policy and esoteric insider terminology. They could act to support policy which aims to distribute benefits and impacts fairly.

Community energy provides, prima facie, a major opportunity to focus comprehensive approaches to achieving reduced emissions, funding streams and anchor behaviour change. In exemplar, area based, schemes in Europe energy is only one component in a virtuous cycle which includes waste from an area flowing seamlessly to an energy plant and joined to water and other cycles, green roofs, smart meters, community development etc. In addition to the on-going work noted in the Consultation we understand that, the Assembly Government's Department for Economy and Transport is bringing forward a number of pathfinder schemes which aim to capture some of the aspects of these area based schemes.

Such schemes also potentially lend themselves to community economic development business models – energy cooperatives etc - assisting the strengthening of the Assembly Government's Social Enterprise Agenda.

Question 19: Are there other key actions that we should be taking in relation to the residential sector? If so what, what would it cost and what level of greenhouse gas emission reduction savings would it generate?

The area based approach is, in our view the best way of achieving comprehensive improvements given the barriers – take up in the existing stock and presuming resources are limited and focused on those with limited means. Encouraging those able to pay – might best be approached through focused area strategies which enable economies of scale and efficiency – with area focused contracts offering savings passed to the individual. They would also facilitate organising alternative funding streams. Stock transfer provides similar opportunities providing such transfers are supported in including adjacent private stock.

Surface water run-off is not dealt with. Maximising garden areas with a range of biodiversity is important to aid surface water run-off, provide habitats and green urban areas. Using gardens for food supply is also an important resource.

Question 20: What are you doing to help reduce emissions from the residential sector? What would help you do more or enable you to start contributing to emission reduction from the residential sector?

Planning is an important lever as described variously above but where guidance needs to be strengthened and where practitioners need to be engaged.

Planning legislation and policy provides a central framework to assist initiatives and the rationale for area intervention. It is a vehicle to use in securing public engagement.

From a specifically Town Planning point of view there is an issue of scale, as there is no legal development plan above the Unitary Area. The default option is replicating initiatives in 22 areas. In England there are formal Regional Spatial Strategies. We are not sufficiently cognisant of latest developments in supporting strategic level adaptation / mitigation but they are worth monitoring and the RTPI would be pleased to assist.

During 2009, RTPI Cymru with support from the Assembly Government's Planning Division, has delivered training on the new package of planning policy and guidance on delivering sustainable buildings in Wales and the new requirement for Design and Access Statements, encouraging inclusive design.

Question 21: Have we identified the key challenges for emission reduction for the residential sector?

The historic building sector has not been included. Many historic buildings are used for housing and this is an important stock which should be assisted; demonstrations on how these buildings could be adapted to deal with climate change, as well as reduce their own emissions and install low / zero carbon technologies would be useful for owners and planning / conservation officers.

The Assembly Government's Planning Division produced a householder guide to climate change during 2008, and this is particularly useful. However further attention needs to be made to providing information and advice to householders seeking to make home improvements and to small builders and retailers so that good advice is available and overcomes the myths and marketing green wash.

Question 22: How do you think these challenges in relation to the residential sector could be addressed?

Information and advice on mitigation and adaptation to climate change to those involved with historic buildings should be developed and promoted. RTPI Cymru is working with the National Trust to promote examples of where this has been done successfully, and we are holding a joint seminar on 3rd November to take this forward.

Behavioural change by residents is a key area. It is important to also educate the smaller builder sector to ensure they undertake work in accordance with climate change issues. Campaigning for a reduction in VAT on services and supplies for making improvements in this field would help in making works more affordable and assist reputable builders in being commissioned.

Question 23: Do you agree with the proposals for action in the agriculture and land use sector? Are there any major barriers to delivery?

We note that your use of the term 'land use' is not the conventional use of the term in spatial planning, rather it is concerned with land production.

Question 24: Are there other key actions that we should be taking in relation to agriculture and land use? If so what, what would it cost and what level of greenhouse gas emission reduction savings would it generate?

No comment

Question 25: What are you doing to help reduce emissions from agriculture and land use? What would help you do more or enable you to start contributing to emission reduction from agriculture and land use?

No comment

Question 26: Have we identified the key challenges for emission reduction in agriculture and land use?

No comment

Question 27: How do you think these challenges in relation to agriculture and land use could be addressed?

No comment

Question 28: Do you agree with the proposal for action in waste, including those set out in the Waste Strategy consultation? Are there any major barriers to delivery?

Waste is an important issue for tackling climate change. In addition we have insufficient resources to be wasting them. Behavioural change in society generally as well as business, is crucial in tackling this problem.

Question 29: Are there other key actions that we should be taking in relation to waste? If so what, what would it cost and what level of greenhouse gas emission reduction savings would it generate?

No comment

Question 30: What are you doing to help reduce emissions from waste? What would help you do more or enable you to start contributing to emission reduction from waste?

The RTPI in developing seminar / conference programmes for those involved in spatial planning seeks to embed climate change issues into these.

Question 31: Have we identified the key challenges for emission reduction from waste?

There is a current risk to delivering the facilities for waste. There are cases recently in Wales where, despite officer recommendation, planning permission for modern facilities, particularly energy from waste schemes is not being granted. The pressure by nimbys and groups and a lack of understanding by local communities of the facilities is proving an issue, despite extensive public consultation activity.

Question 32: How do you think these challenges in relation to waste could be addressed?

Better understanding within the public needs to be developed.

RTPI Cymru has offered assistance to the Waste Department of the Assembly Government to provide training to planning officers in local planning authorities to equip them with the knowledge and skills to deliver this policy area.

Question 33: Do you agree with the proposal for action in the public sector? Are there any major barriers to delivery?

No comment

Question 34: Are there other key actions that we should be taking in relation to the public sector? If so what, what would it cost and what level of greenhouse gas emission reduction savings would it generate?

No comment

Question 35: What are you doing to help reduce emissions from the public sector? What would help you do more or enable you to start contributing to emission reduction from the public sector?

The RTPI in developing seminar / conference programmes for those involved in spatial planning, including those working in Government and Local Planning Authorities, seeks to embed climate change issues into these.

Question 36: Have we identified the key challenges for emission reduction in the public sector?

No comment

Question 37: How do you think these challenges in relation to the public sector could be addressed?

No comment

Question 38: Do you agree with our approach to addressing vulnerability to climate change?

No comment

Question 39: Are there any additional strategic actions that are necessary?

There is no reference to adaptation of transport in Wales.

Question 40: We wish to identify barrier to effective climate change adaptation. Are you aware of any rules, regulations or government action that pose a barrier to effectively adapting to climate change?

There appears to be an issue in the use of SuDS within developments in Wales. RTPI Cymru has run seminars in Wales on this issue to raise the profile and importance of SuDS amongst planners.

Question 41: Are you aware of any process for evaluating adaptation action? If so, please provide detail.

No comment

Question 42: Do you agree with the proposals for action in relation to adaptation and society? Are there any major barriers to delivery?

No comment

Question 43: Are there other key actions that we should be taking in relation to adaptation and society?

No comment

Question 44: What are you doing in relation to adaptation and society? What would help you do more or enable you to start contributing more?

No comment

Question 45: Do you agree with the proposals for action in relation to adaptation and the economy? Are there any major barriers to delivery?

No comment

Question 46: Are there other key actions that we should be taking in relation to adaptation and the economy?

No comment

Question 47: What are you doing in relation to adaptation and the economy? What would help you do more or enable you to start contributing more?

No comment

Question 48: Do you agree with the proposals for action in relation to adaptation and the natural environment? Are there any major barriers to delivery?

No comment

Question 49: Are there other key actions that we should be taking in relation to adaptation and the natural environment?

No comment

Question 50: What are you doing in relation to adaptation and the natural environment? What would help you do more or enable you to start contributing more?

No comment