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Dear Sirs

**ADAPTING TO CLIMATE CHANGE: A CHECKLIST FOR DEVELOPMENT
Consultation Paper: February 2005**

The Institute welcomes the opportunity to comment on this consultation paper, prepared by the Three Regions Climate Change Group (made up of representatives from the East of England Sustainable Development Roundtable, the London Climate Change Partnership and the South East Climate Change Partnership), and available on the Government Office for London website at www.gos.gov.uk/gol/161420/161481/178616/248264. We have consulted the members of our Environmental Planning & Protection and Urban Design Networks, and the appropriate regional Branches, as a result of which I can offer you the following comments.

GENERAL COMMENTS

1. The Institute welcomes this consultation paper. It represents a useful step forward in encouraging all those involved in the development process – and end users of buildings – to consider the important impacts of climate change. However, while we can all agree that climate change is occurring, and see the need to manage its more negative impacts, we must also look at climate change in a more positive light.

2. It is noted that the document is not intended to be a design manual, but more a checklist of how the design of new developments must adapt to the challenge of climate change. We think this is the right approach, with the checklist highlighting, for developers, their design teams, architects, investors and policy makers, the need for developments to be “climate proofed” at the outset.

DETAILED COMMENTS

Is the Checklist and Guidance useful to you? How will you be able to use it?

3. The checklist and guidance are both useful. However, on first reading, the checklist was unclear without reference to the more detailed explanation of the issues that follows. This is a presentational issue, and there are probably arguments in favour of either approach, but, on balance, we feel that it would be better if the checklist came after the more detailed consideration of the issues. This could be signposted at the start of the document.

Does the Guidance contain the right level of information?

4. The guidance touches on some of the difficult aspects of trying to build developments that meet all sustainable and climate change requirements – eg the provision of private open space versus the need to build at high density; or the need to protect buildings against flooding but also to ensure accessibility to those with disabilities. It would be useful if the document identified other potential conflicts and highlighted these. Otherwise, there is the danger that developers try to meet one set of criteria, but miss another, leading to confusion, or worse, to exasperation at the guidance.

Are there any gaps? What are the other issues that need to be included?

5. The checklist could be made more positive. The issues recognise that there are some benefits to climate change - eg increasing the potential to use solar energy - but this did not seem to follow through to the checklist.
6. More guidance could be presented on the appropriate use of vegetation for ease of maintenance under extreme conditions and how wildlife can be catered for.

Is the document targeting the right people who else should we be approaching?

7. The section on opportunities and risks begins to look at the impact on the end user. There could be a greater focus on this. We can aim to build the most “climate proof” developments but if the end user is not convinced these will not be used to their full potential. Presumably, in the short term, the cost of a “climate proof” building will be higher, and as the increased costs will be met by the end user, they need to be made aware of the long term benefit – ie there is a promotional point around “whole life” costing.
8. The section on the business case for adapting to climate change could be made clearer. Some of the material on opportunities/risks relates to the developer of “climate proofed” schemes where, and some to the end user. In order to better put the case to the end user it may be preferable to separate the two.
9. The document should also be strongly promoted to local planning authorities, as development plan policies could readily incorporate many of the concepts.

What is your view on how best to mainstream adaptation to climate change in development/buildings, for example, should it be done by a national code or legislation?

10. As a first step, it is recommended that the document, in its final form, should be disseminated as widely as possible to all within the three regions that are within the target audience – to public, private and voluntary sectors. It might also be put on the

Internet, and widely publicised, so that those from outside the three regions have access to it.

11. Inevitably it will be those who are willing to respond to the climate change agenda that will seek to implement it in the short term. It might be useful to follow up publication of the current guidance with good practice guidance and case studies to show what can be done, and encourage greater up-take. Consideration might also be given to the development of an annual award scheme for those buildings and developments that have successfully “climate proofed”, and the Institute would be happy to discuss this possibility.
12. Most of the measures suggested – although they might represent emerging good practice - are entirely voluntary at present. There is a strong case for strengthening the requirement to ensure that decisions concerning the location, layout and design of developments take into account fully the need to consider all the adaptation factors covered by this document. This might best be achieved by new planning policy guidance on the one hand, and a strengthening of the appropriate areas of the building regulations on the other.
13. Any strengthening of statutory requirements must recognise that much of the adaptation to climate change – issues such as flooding, rain and soils, for example – needs to reflect local circumstances, whereas requirements on matters such as water and energy conservation may more appropriately be defined through national codes and the environmental labelling of property.
14. Finally, it might also be worthwhile exploring the possibility of developing a “climate proof” rating along the lines of the current home energy rating reports, which are prepared when a home is surveyed and the results are fed back to the potential owners.

I hope these comments are helpful. If any require clarification or elaboration, please do not hesitate to contact me.

Yours faithfully

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