



RTPI

mediation of space · making of place

Royal Town Planning Institute
41 Botolph Lane
London EC3R 8DL
Tel +44(0)20 7929 9494
Fax +44(0)20 7929 9490

Email online@rtpi.org.uk
Website: www.rtpi.org.uk

Registered Charity Numbers
England 262865
Scotland SC 037841

Patron HRH The Prince of Wales KG KT PC GCB

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Susan Tipping
Communities and Local Government
Planning Resources and Environment Policy
Zone 1/B1
Eland House
Bressenden Place
LONDON
SW1E 5DU

Email response sent to: CCPPSConsultation@communities.gsi.gov.uk

Dear Ms Tipping,

RESPONSE TO DRAFT PLANNING POLICY STATEMENT: PLANNING FOR A LOW CARBON FUTURE IN A CHANGING CLIMATE

Thank you for the opportunity to respond to this consultation. The Royal Town Planning Institute (RTPI) represents over 22,000 spatial planners, existing to advance the science and art of town planning for the benefit of the public.

This document responds to the draft Planning Policy Statement: Planning for a Low Carbon Future in a Changing Climate (draft PPS). It has been formed drawing on the expertise of members including the RTPI Climate Change Champions, the South West Region, and individual members.

The RTPI welcomes the review of the Climate Change Supplement to Planning Policy Statement 1, reflecting the fast-paced changes surrounding climate change and the associated technologies. We also wish to highlight that mitigating and adapting to climate change more than just relates to energy and other measures (for example flood defences, sustainable building design, etc) are found in other PPSs. It is vital that these measures are clearly acknowledged in the PPS and appropriate references are included to ensure the whole facet of climate change is captured.

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 is particularly concerned that the draft PPS doesn't address the location of development or the ability to reduce the need to travel. Disappointingly, and in common with other recent PPSs, this statement concentrates on the individual site level, focusing on the role of the building rather than the contribution the layout of the area and the assessment of options for site selection can have on mitigating or adapting to climate change. This is the role that spatial 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 policy. We do 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. Therefore we believe that a strategic approach should be taken on urban form, density, mixed use, transport accessibility and nodes and green space strategies. This needs to be made clear in the policy and, importantly, in the accompanying Practice Guide.

There appears to be a possible flaw in Policy LCF11 which appears to provide Local Planning Authorities with an option to set high sustainability standards. While this may seem on the surface to be a laudable objective, there needs to be some thought as to whether developers could achieve such possible high standards. Additionally, the draft PPS remains unclear as to how to weigh the competing and sometimes conflicting needs of delivering sustainable development, particularly where viability (i.e. economic) appears to override other sustainability objectives.

It is considered that the relationship between national policy statements (in whatever future form they may take) and planning policy statements, particularly relating to what is considered the overriding policy is unclear in the draft PPS. Further clarification on this matter will aid in interpretation and decision making.

Furthermore, CLG's first 'streamlining' objective is the separation of 'guidance' and 'policy'. In this respect the draft PPS has not entirely succeeded. There are many places where there is confusion between the two. For example, it is confusing to refer to advice to local authorities and others on the preparation of planning documents as 'policy'. Also, a number of statements under the headings of Plan Making and Development Management could be construed as either advice or policy. It should always be clear which they are.

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 RTPi is working with CLG and its partners in providing information, advice and training for all those involved, including elected members.

Finally, the draft PPS assumes much of the implementation through Regional Strategies, which are proposed to disappear as part of the new Coalition Government's proposed planning and constitutional changes. Because there may soon be no regional tier in planning and a reduced number of Regional Development Agencies, significant sections of the proposed Planning Statement may need to be revised.

Enclosed is the RTPi's response to the formal consultation questions.

If you require further assistance, have any queries relating to the enclosed or require clarification of any points made, please contact Rebecca Coates, Planning Policy Officer on 0207 929 9466 or email rebecca.coates@rtpi.org.uk.

Yours sincerely,



Matt Thomson
Head of Policy and Practice
Enc.

1. Do you support the consolidation and streamlining of the PPS1 supplement and PPS22 on renewable energy into a single planning policy statement?

Yes. The RTPI supports the streamlining of policy relating to climate change into one succinct statement. The benefits of which will inevitably lead to more coordinated approach to plan making and development management relating to mitigating and adapting to the effects of climate change.

2. Does the proposed PPS address sufficiently all the issues that planners face in relation to climate change? If not, what is missing and why?

No. As proposed the RTPI's main concern is the lack of a spatial planning dimension – the strategic element of policy-making, including the assessment of alternative options – which should integrate measures relating to the individual building with the wider built environment and to mitigate and adapt to climate change.

Additionally, the RTPI consider that other aspects missing include: carbon sinks; hydrogen technology and the relationship to 'big' energy; and issues surrounding proportionality are not clear.

3. Do you agree that this proposed PPS should continue to be a supplement to PPS1?

The RTPI has consistently advocated for the principles of the existing PPS1 supplement to be incorporated into a revised PPS1, rather than a supplement. However, in lieu of a holistic review of PPS1, we are supportive of the policy statement remaining a supplement. This will ensure that climate change remains an overarching policy in the PPS series. A separate PPS would downgrade its importance. We view the 'supplement' arrangement as a compromise, which, although it does have some advantages in enabling policy on climate change to be more easily updated as technology and our understanding of climate change issues advances, is less practicable for its users and increases the risk of inconsistencies between PPSs, especially in terms of balancing climate change needs with other aspects of sustainability.

4. We propose that regional strategies should set ambitious targets for renewable energy and that targets should be expressed as a minimum amount of installed capacity in Megawatts (MW). Do you agree with how this target is described and that the assessment supporting the target should, where feasible, be consistent with the methodology provided by Department of Energy and Climate Change (DECC)?

The RTPI considers that the policy as currently drafted is unclear, particularly where it relates to supply and demand. It also appears to be too narrow focused, until policies relating to a regime of carbon allowances for individuals are introduced.

The Institute suggest that a re-think of the policy is required to ensure consistency with the strategic nature of the rest of the PPS.

Consideration also needs to be given to how this policy will be viewed by the new government given their approach to both regional planning and centrally imposed targets.

5. We propose that local planning authorities should assess opportunities for decentralised energy in their area. Are these requirements sufficiently clear and manageable?

The RTPI support the principle of local planning authorities undertaking this assessment, as it forms part of the holistic approach that is spatial planning. Planners need clear and

consistent requirements for developing their LDF evidence base. Our members are satisfied that the draft PPS is adequate in this respect.

There are already examples of this happening in places such as Barnsley. The question remains whether this approach should apply to all developments, or only to larger developments such as waste plants and hospitals that are at a scale that can be used to heat nearby homes.

6. We propose that sites that perform poorly against the criteria in policy LCF6.1 should not be allocated for development (with limited exceptions). Do you agree with this suggested approach?

Yes. But it is a matter of degree, as there are a wide range of factors to consider. Again, it is disappointing that spatial planning is missed from the checklist, and this is an issue on which greater clarity with regard to the balance to be struck with other sustainability considerations, as well as conservation of built and natural heritage.

7. We propose in LCF7 the approach for local authorities when setting local requirements for using decentralised energy in new development. We also propose, in LCF8, that, as an interim measure until the coming into force of the 2013 revisions, the Secretary of State will support the application of authority-wide targets where these are included in the development plan. Do you agree with this approach?

Yes. The RTPI supports the proposed interim approach for decentralised energy and commend Government for driving this initiative forward in lieu of up to date Building Regulations. It is important to acknowledge however, that the interim measure will require a substantial amount of work by local authorities and in reality it might be for little gain, therefore it is essential that it remain optional and not mandatory for LPAs. It is worth noting that the cut off date when at current the amended building regulations are not adopted and may be subject to significant change. Removing the ability of LPAs to set site by site renewable targets past 2013 may leave a number of authorities unable to ensure their contribution towards regional targets.

The definition of decentralised energy needs to be clarified as it covers a very wide spectrum of development in terms of scale i.e. from energy plants down to householders' solar panels.

It is important to realise however, that there are a number of Local Planning Authorities, particularly in urban regions, who may not have significant opportunities for large scale renewable energy generation. In such cases Planning Authorities may rely on contributions from small-scale renewables from individual developments to contribute to the regional targets required by the proposed LCF2. The RTPI supports this approach.

8. Do you agree with the approach to setting requirements for sustainable buildings including in water stressed areas?

The RTPI is concerned that the code for sustainable homes is quite a narrow focused tool, which does not address all local sustainability targets. The proposed policy suggests that this is the sole tool to be used. Some members also raised concerns that the reluctance by the government to put numbers against demand reduction in the same way as they are included for production of renewable energy is an issue. A potential solution may be that Policy LCF be revised to allow Local Planning Authorities to set local sustainable building and design criteria outside of the Code for Sustainable Homes in DPDs, but only subject to a robust evidence base demonstrating a local need for that particular solution.

Additionally, the RTPI would like to see bullet point 5.1 amended to remove 'new' from 'new development' as the policy should address both the existing and new built form.

9. We propose that local planning authorities should support the take up of electric vehicles, including being able to set local requirements for installing cabling or charging infrastructure for electric vehicles in new developments with parking facilities. Do you agree with the proposed approach?

The RTPI is not convinced that the proposals for electric vehicles address issues surrounding land-use integration or congestion. In spatial terms, the draft policy reinforces the assumption that it is acceptable to maintain and promote the current levels of personal mobility rather than encouraging a modal shift to walking, cycling and public transport. This in turn maintains a spatial distribution of development that depends on a higher degree of movement of people and goods, and hence the emission of carbon whatever the energy source, relative to more concentrated spatial models. Nor does the policy address where the energy is coming from to power the electric vehicles and this is a fundamental flaw which calls into question the legitimacy of this policy.

If this policy is to continue regardless, the policy absolutely must specify a national standard for acceptable types of charging points within certain types of development. There is no point installing slow charge points in many types of developments (where 3 phase is necessary) and failure to do so would mean people may hinder travel between different planning areas.

These issues need to be addressed before the RTPI would be happy to support it.

10. Proposals for major new development that do not comply with the criteria set out in proposed policy LCF13 should normally be refused planning permission. Do you agree with this proposed approach?

Yes. However, the RTPI is concerned that once again the spatial element is missing and this is a fundamental element of the development planning and development management planning system.

The Institute questions the 10 dwelling threshold, particularly in rural areas – and some urban areas – where the majority of development is under 10 dwellings but could be significant cumulatively. We would suggest that the threshold, if applied, should be capable of variation subject to factors such as the prevalence of small sites in an area.

In addition, we consider that refusal of inappropriate applications would be difficult without benchmarks in place.

11. We have set out a positive framework for renewable and low carbon energy, including the factors in proposed policy LCF14, that should be taken into account in determining planning applications. Do you agree with these and are they sufficiently clear?

The RTPI questions why noise and green belts are specifically mentioned but the issues of visual impacts, mitigation, Areas of Outstanding Natural Beauty and national parks are not considered. A revised policy should include a more holistic view of these factors and other designations.

In addition, the draft policy doesn't mention the potential for conflict between the development of renewable energy and green infrastructure; this should be addressed in the final document.

12. Do you agree with the conclusions of the consultation stage Impact Assessment? In particular, have we correctly identified any additional burdens for local planning authorities? Is the impact on owners/developers correctly identified and proportionate to their responsibilities?

Yes. The RTPI doesn't foresee any new burdens.

- 13. Do you think that the proposals in this proposed PPS will have different impact, either positive or negative, on people, because of their gender, race or disability? If so, how in your view should we respond? We particularly welcome the views of organisations and individuals with specific expertise in these areas.**

No comment.

Other comments

Resources

Some members were concerned that few Regional Development Agencies have resources, methodologies and mechanisms for assessing the capacity for renewables generation on a regional basis. Additionally, it was also questioned whether regional or local authorities have the capacity for producing heat maps. (If RDAs are to be abolished and replaced, if required locally, with Local Enterprise Partnerships, these concerns would also apply where those are set up.)

Low carbon policies and existing development

The PPS should be addressing opportunities to apply low carbon criteria in the case of existing development when proposed change becomes a development management matter. Areas that this might cover would include the renovation or redevelopment of properties incorporating higher thermal insulation/ carbon efficiency standards and the retrofitting of energy infrastructure to buildings within existing built-up areas.

Setting realistic renewable energy targets at regional and sub-regional level

The draft PPS talks about 'ambitious' renewable energy targets set within Regional Strategies, but would not more progress be made by setting realistic targets at the sub-regional level. At such a scale, renewable energy projects might be better judged against their potential effects upon significant social, economic and environmental assets which they should not always override. In revising the draft PPS it will be important to take account of whatever delivery arrangements are now envisaged for the renewable energy targets.

Local development plans and renewable energy targets

We assume that the distribution and delivery of renewable energy targets would be policy matters to be taken into account within the development plan system in any particular area. If this is the case then, the PPS should make clear how the government wishes to see such arrangements working. For example, in regions such as the South West, where there is still a mainly two-tier structure of local government, clarification is needed on whether the Counties should determine the distribution of renewable energy targets between Districts. Furthermore, there should be clarification of the expected working relationship between Counties and the Unitary Councils, where, as in the South West, the latter are also strategic level planning authorities.

Proposed new renewable or low carbon energy developments in environmentally sensitive areas

The PPS needs to acknowledge (in Policy LCF 14) that in areas such as National Parks, World Heritage Sites, AONBs, internationally recognised wildlife conservation sites (SACs,

SPAs, Ramsar sites, UN Biosphere Reserves) and the undeveloped coast, proposed new renewable or low carbon energy projects may well constitute inappropriate development (see also point above about sub-regional targets).