

Briefing

Tackling climate change through the planning system

Looking at the new Planning Policy Statement on climate change

“There is an urgent need for action. Used positively, spatial planning has a pivotal and significant role in helping:

- *secure enduring progress against the UK’s emissions targets, by direct influence on energy use and emissions, and in bringing together and encouraging action by others;*
- *deliver the Government’s ambition of zero carbon development;*
- *shape sustainable communities that are resilient to the climate change now accepted as inevitable;*
- *create an attractive environment for innovation and for the private sector to bring forward investment in renewable and low-carbon technologies and supporting infrastructure; and,*
- *give local communities real opportunities to influence, and take, action on climate change”*

Paragraph 5. Planning Policy Statement: Planning and Climate Change.
Supplement to Planning Policy Statement 1. (Consultation document)

Friends of the Earth inspires solutions to environmental problems, which make life better for people.

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- **the most extensive environmental network in the world, with almost one million supporters across five continents and over 60 national organisations worldwide**
- **a unique network of campaigning local groups, working in over 200 communities throughout England, Wales and Northern Ireland**
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Introduction

In 2005 Friends of the Earth began a major campaign to persuade the Government to publish a comprehensive Planning Policy Statement which set out how the planning system could reduce carbon emissions.

In December 2006 the Government published a package of new measures including a draft Planning Policy Statement and the new Code for Sustainable Homes.

The briefing will focus on the Planning Policy Statement - and how we can use it to deliver our vision of a low carbon society.

Note: The full title of the new document is '*Planning Policy Statement: Planning and Climate Change. Supplement to Planning Policy Statement 1*'

1. So, in a nutshell, is the new document any good?

Friends of the Earth prepared an alternative Planning Policy Statement (PPS) on climate with a range of coalition partners. Although the Government's final version did not adopt all of our measures, we would still give it a score of **6 out of 10**.

Our response to the Government's draft PPS is available here:
<http://www.foe.co.uk/campaigns/climate/resource/experts.html>

Measured against the best Local Authorities, such as Woking and Merton, the new Planning Policy Statement will make little difference. But for the vast majority of local councils – who are doing little or nothing about climate change – it should result in dramatic changes.

2. How does the new Planning Policy Statement help us take local action?

Friends of the Earth's '*Action Pack 5 – Tackling Climate Change at the Local Level*' (2005) sets out how the local planning system works, and examines how to try and encourage planning policies that take climate change into consideration.

The new Planning Policy Statement should help to reinforce these arguments, and crucially, give them the weight of Government backing.

The first and most important aspect of the new Planning Policy Statement is its impact on the culture of decision makers. At present many local councils do not consider climate change when making decisions on individual applications, nor do they have specific policies on how to take climate change impacts into account through the planning system.

This new statement makes it absolutely clear to planners and politicians that they must put climate at the top of the planning agenda. They must take action to reduce the cause of climate change by:

- Having a good understanding of baseline CO₂ emissions and the impact of new development on these emissions (See Para 12 of the new Planning Policy Statement)
- Encourage strong community participation in climate solutions (See Para 5)
- Reducing the need to travel by car and reducing the amount of road freight (See Para 6)
- Shaping places that reduce the need to travel by promoting mixed-use development (See Para 7)
- Actively promoting micro renewables in new development (See Para 22).
- Actively promoting decentralised energy production and of medium and large scale renewable energy projects. (see Para 10 and 22)
- Removing unnecessarily restrictive policies which prevent the delivery of renewable technologies (see Para 22)

If you are writing to your council about a planning matter or the redrafting of the local planning documents, the new Planning Policy Statement is a useful resource to quote from.

How does the Planning Policy Statement help us to adapt to impacts of climate change?

Adaptation is an increasingly complex issue and ranges from enhancing the resilience of natural habitats to the need for urban cooling by preserving green open space. Local councils should be thinking about all of these issues when planning for new developments or considering planning applications (see Para 6). One word of warning. Some councils think that adaptation is all they need to do on climate change. In fact the reduction of CO₂ and the adaptation to the unavoidable effects of climate change must be achieved together.

Will this Planning Policy Statement help us refuse individual carbon intensive development?

Yes. The clear policy direction of the Planning Policy Statement is to promote the reduction of carbon emissions. So once these policies have been incorporated into Local Development Plan documents any new development will have to be assessed against these policies.

In addition this Planning Policy Statement reinforces the importance of climate as a material consideration. As ever, there are a couple of big qualifications to this. Firstly, Para 13 contains some pretty confusing policy on why individual CO₂ reduction targets cannot be used as the sole reason to refuse individual new development. This is to ensure that new

development can not simply be refused on the mechanistic grounds that it would have a CO₂ positive impact. However, where development comes forward which compromises the objectives of regional or local plans to reduce CO₂ then this can be an important reason for refusal.

Why does the title talk about a supplement to PPS 1?

The draft new Planning Policy Statement on climate will be a supplement to Planning Policy Statement 1 (Delivering Sustainable Development, 2004) which contains the core objectives of the planning system. It might sound complicated but the idea is that climate change should sit within these core objectives and be one of the biggest priorities for the system.

Why are you bothering me with a draft document? Don't we have to wait until it is finalised?

Draft Planning Policy Statements carry a lot of weight in the planning system. Government has sent a clear message that local and regional authorities should get on with the implementation of the policy. But even more important, **many local plans** (local development frameworks cross-reference) **are being prepared now so there's a real opportunity to make changes this year**. The final version of the Planning Policy Statement will be published in the summer.

Confused?

Well the bottom line in most areas is to work within the plan and keep asking the key question '*How does this development help reduce CO₂ emissions?*', and if it doesn't, '*Should we be approving it?*'.

How can the new Planning Policy Statement help us to promote renewables projects?

The Planning Policy Statement provides strong support for renewable projects and complements the contents of Planning Policy Statement 22 (Renewable Energy). The Planning Policy Statement does not create a free for all for wind projects and does stress importance of statutory designations. However, it does make clear that given the imperative to increase renewable energy, unreasonable restrictions should not be applied to new schemes which can make a real difference. Paragraph 22 of the new Planning Policy Statement makes clear that local councils '***should look favourably on proposals for renewable energy, including on sites not identified in development plan documents***'

Does the new PPS still allow Local Authorities to ask for higher standards of building performance than contained in building regulations?

There has been intense lobbying from the building industry to have just one national standard on building quality - and not to allow Local Authorities to deviate from this. Friends of the Earth and others have argued that Local Authorities should have flexibility to push for higher standards where this is justified. The result of this debate is a compromise. Local Authorities can adopt policies in their plans to achieve higher levels than required by building regulations - but they should stick within national code standards rather than inventing their own requirements. Paragraph 31 states ***'Where planning authorities wish to require higher levels of building performance, because of local development or site-specific opportunities, the expected local approach should be set out in advance in a development plan document. For new homes local standards should be based on the Code for Sustainable Homes.'***

This position is plainly not ideal because Local Authorities must adhere to the standards set within the Code for Sustainable Homes. Industry will also be able to argue about the viability of such policy in the context of other Government policy to expand housing provision (see Para 32). However, the Code does deliver carbon zero development at Code level 6. The question is has the Government restricted the scope of Local Authorities to deliver zero carbon development earlier than the 2016 dead line? **The answer is they have not.** This means there is an important opportunity your local council to move further and faster than the Government's 2016 deadline. It is worth bearing in mind that Local Authorities have always been asked not to duplicate building regulations through planning policy.

So what does the new policy say about CO₂ targets ?

The Planning Policy Statement makes clear that as a minimum the planning system is required to implement the Government's national overall target for CO₂ reduction including the 60 per cent reduction by 2050 (Para 3). It makes it clear that regional plans must have a CO₂ trajectory for all new commercial and residential development and this must be measured against the CO₂ profile of the region to give a greater understanding of how much CO₂ is being reduced.

In addition to the national targets the Planning Policy Statement suggests that regional plans use interim yardstick targets to help measure carbon performance. The Planning Policy Statement is less clear about how targets should be handled at the local level. This is partly because under the new system the regional plan (Regional Spatial Strategy) is directly applicable to all local decisions. So if your regional plan has a carbon reduction policy it must be reflected in you local council's plan.

The targets in the regional plans must be evidence based and must be related to a reasonable understanding of what regional planning policy can deliver. For example an aspirational target on dramatic CO₂ reductions in the aviation sector is unlikely to be acceptable.

What is the Code for Sustainable Homes?

The Code for Sustainable Homes sets our broad environmental standards including energy efficiency, water consumption and the use of materials. The Code has six levels, with Level 6 being carbon zero. The Code is voluntary but will be made mandatory through building regulations in 2016.

Achieving a sustainability rating					
Minimum Standards					
Energy			Water		Other Points ⁴ Required
Code Level	Standard (Percentage better than Part L ¹ 2006)	Points Awarded	Standard (litres per person per day)	Points Awarded	
1(★)	10	1.2	120	1.5	33.3
2(★★)	18	3.5	120	1.5	43.0
3(★★★)	25	5.8	105	4.5	46.7
4(★★★★)	44	9.4	105	4.5	54.1
5(★★★★★)	100 ²	16.4	80	7.5	60.1
6(★★★★★★)	A zero carbon home ³	17.6	80	7.5	64.9

Notes

1. Building Regulations: Approved Document L (2006) – ‘Conservation of Fuel and Power.’
2. Zero emissions in relation to Building Regulations issues (i.e. zero emissions from heating, hot water, ventilation and lighting).
3. A completely zero carbon home (i.e. zero net emissions of carbon dioxide (CO₂) from **all** energy use in the home).
4. All points in this document are rounded to one decimal place.

Box 1: Achieving a sustainability rating, taken from a Code for Sustainable Homes: A step-change in sustainable home building practice. Published by the Department for Communities and Local Government in December 2006.

Okay so what's wrong with the new policy package?

We have two major areas of criticism about the overall climate package.

- 1) The 2016 deadline for carbon zero development in the Code is too late. Research carried out the Friends of the Earth by the Tyndall Centre makes clear the need for significant carbon reductions from 2012. If we are serious about meeting our mid-century targets for carbon reduction we have to move to carbon zero development at a much faster pace.
- 2) The package focuses on new developments and there is an urgent need to develop effective packages to retrofit existing development with good energy-efficiency and renewable energy technology. The Planning Policy Statement does talk about the opportunities of linking existing development to decentralised renewable energy systems which are being developed for new housing (see Para 23). The Government is also planning to produce a draft standard for commercial development this year.

Much of our criticism of the Planning Policy Statement stems from the very dense language. The more detailed practice guidance will be produced with the final statement at the end of 2007.

Conclusion

The new Planning Policy Statement is not perfect but it will make a big difference to many local councils allowing for a better and more informed debate. Our role nationally and locally is to continue pushing for faster implementation of climate solutions and a better awareness amongst decision-makers of the imperative of reducing carbon emissions.

Local action working with your local council is one of the vital ways you can make a difference.

Resources

The draft Planning Policy Statement is available here:

[Hhttp://www.communities.gov.uk/index.asp?id=1505140](http://www.communities.gov.uk/index.asp?id=1505140)H

The Code for Sustainable Homes is available here:

[Hhttp://www.communities.gov.uk/index.asp?id=1506120](http://www.communities.gov.uk/index.asp?id=1506120)H

The Tyndall Report on a Route to a Low Carbon Economy is here:

[Hhttp://www.foe.co.uk/campaigns/climate/news/carbon_budget.html](http://www.foe.co.uk/campaigns/climate/news/carbon_budget.html)H