

# Friends of the Earth response to the Consultation on Planning and Climate Change - Supplement to Planning Policy Statement 1



Friends of the Earth welcomes the new supplement to PPS 1 as significant step forward in using the planning system to deal effectively with the challenge of climate change. We welcome the key emphasis on the consideration of climate and the intention to create a systematic framework for both reducing the causes of climate change and adapting to the consequences. Friends of the Earth has made a series of detailed interventions on the formulation of the draft PPS in the run up to its publication and as result the following comments are a reflection our key concerns.

## Evidence base

Since the publication of the draft PPS the Intergovernmental Panel on Climate Change has released the Physical Science Basis report – the first volume in the new Fourth Assessment Report on Climate Change<sup>1</sup>. This report highlights even more than ever before the magnitude of the problem and the urgency of providing effective solutions. We recommend that the PPS carefully considers the implications of the report in its final version.

## Climate and culture change

Perhaps the most major barrier to delivery of successful approach to climate change is lack of awareness amongst key stakeholders of the imperative of dealing with the issue. The PPS should contain a stronger opening section which conveys even more forcefully the need to make changes now. There is room for even more prescriptive transitional arrangements which lay out simply the opportunities of, for example, SPG in delivering on the Objectives of the PPS. Specific mention should be made of the need to deal with climate change responsibly so that communities face the challenge of providing for renewable energy supply.

## Dealing with carbon

There is an opportunity to provide increased clarity in the PPS on how carbon forecasting is handled in the strategic planning process. Friends of the Earth continues to believe that the diagram in Para 6.1 of the Friends of the Earth/TCPA 'mock' PPS offers a more coherent and understandable exposition of how to approach climate change. It has the added value of embedding an integrated approach to reduction and adaptation. This approach was recommended by the SE climate change partnership and we strongly recommend that it be included in the final version of the PPS.

## Targets and trajectories

We welcome the emphasis on the need to provide a strong evidence base for carbon trajectories and bench marks. We are concerned that greater clarity is given to the scope of these mechanisms. Para 11 of the PPS implies that RSS should consider carbon trajectories for new development against a base line. There is some confusion as whether this limits consideration of wider CO<sub>2</sub> emissions which planning policy can influence. For example increasing renewable energy provision or the retrofit of existing stock with decentralised energy will impact on carbon reduction and does need part of carbon methodology mix. Other action by

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<sup>1</sup> <http://www.ipcc.ch/>

regional and local partners or national government on energy efficiency must also be considered to provide for a robust 'picture' of carbon performance.

It is also important that regions have a carbon reduction trajectory. This is implied in the PPS in relation to national targets but should be made explicit. Carbon reduction trajectories should be set at national standards as a minimum but there should be scope for deviation where this can be properly evidenced and delivered.

#### Local Authority action

There has been some concern that the PPS restricts the discretion of the local authorities to pursue innovative standards outside the Code for Sustainable Homes, on energy efficiency. We support the idea of using the Code as a coherent set of standards and the provision that Local Authorities can reach higher levels of Code where this is justified by local circumstance. However Local Authorities should be positively encouraged to pursue innovation in this field and not be restricted from considering new approaches which may be more effective than the Code standards approach. LPAs should be positively encouraged to reach Code Level 6 as soon as is practicable and should be encouraged to consider applying Code standards to significant extensions and conversions of residential building. The PPS should signal a clear direction of travel on zero carbon for commercial buildings and encourage innovation wherever possible.

#### Renewable energy

Friends of the Earth is concerned that the PPS is unduly restrictive of the application of on site renewable energy production. Para 22 makes clear that a proportion of energy supply from 'substantial' new development should be from renewable on site sources. The word 'substantial' is confusing and will lead many LPAs not to require on site renewable from smaller development. In some rural authorities this may have a dramatic negative impact on carbon performance. The paragraph should be amended to require all new development to provide a significant proportion of on site renewable generation. The provisions of Para 23 provide for safe guards where a specific development wishes to take a different approach.

#### Community Engagement

Friends of the Earth strongly welcomes the mention of the role of local community action in delivering on climate change. There should be stronger emphasis in close co-operation and active participation with communities in achieving climate solutions. This positive approach has the benefits of communicating the challenge of climate effectively and embedding communities in shared solutions rather than imposing schemes with no community ownership.

#### Conclusion

Planning can move further and faster to deliver on climate but only if right balance is struck between strong positive encouragement of low and zero carbon development and a stronger regime for restricting carbon intensive development. While we share the concern that climate change is not used in way which unreasonably restricts positive development - the PPS does not provide a strong enough signal that highly carbon intensive development with inadequate reduction and mitigation elements will not normally be allowed. Such a signal complements the direction of travel set out in DCLG climate package.