

## PLANNING POLICY STATEMENT: PLANNING AND CLIMATE CHANGE

### RESPONSE TO CONSULTATION QUESTIONS

Name:	Nigel De Wit
Organisation:	Tonbridge & Malling Borough Council
Address:	Gibson Building, Gibson Drive, Kings Hill, West Malling, Kent ME19 4LZ
E-mail address:	Nigel.dewit@tmbc.gov.uk

Question and Response	Yes	No
<p>Q.1 There is an urgent need for action on climate change and we consider that, used positively, spatial planning has a pivotal and significant role in addressing this challenge. We will provide practice guidance to help implement the planning policy for climate change set out in the PPS. Read together, and as part of the wider package of action being taken forward by the Department in <i>Building a Greener Future</i> to help deliver the Government's ambition of achieving zero carbon development, will the new policy and proposed practice guidance secure planning strategies that deliver reductions in emissions and shape sustainable communities that are resilient to the climate change now accepted as inevitable?</p> <p>Explanation/comment:</p> <p><b><i>It is important to recognise and acknowledge the role other Planning Policy Statements and Guidance Notes can play in realising planning objectives relating to climate change. These other documents are also founded on the principles of sustainable development.</i></b></p> <p><b><i>Furthermore, it is important that the objectives set out in the PPS do not conflict with objectives in other PPSs or PPGs. Different areas face different issues and priorities and it is important to acknowledge that spatial strategy options for certain places, eg urban centres in need of</i></b></p>		

Question and Response	Yes	No
<p><b>regeneration, are limited and that exceptions may need to be made for wider sustainable development reasons eg avoiding continued social/economic blight. This is recognised in paras. 18-20 of PPS25 'Development and Flood Risk'. The PPS on Climate Change needs to adopt a similar approach.</b></p> <p><b>It is vital that the promised practice guidance is published urgently.</b></p>		
<p>Q.2 The PPS sets out Key Planning Objectives and Decision-making principles for the preparation and delivery of spatial strategies by regional planning bodies and all planning authorities. Do you agree with these?</p> <p>Explanation/comment:</p> <p><b>The Key Planning Objectives should recognise that delivering the Government's Climate Change Programme and energy policies should not be at the expense of high quality sensitive design, in accordance with local design codes (where applicable). Mitigating and adapting to climate change should not prohibit high quality designed developments, particularly in sensitive locations - these objectives are not mutually exclusive. This needs to be recognised in the PPS.</b></p>		
<p>Q.3 It is proposed that climate considerations should be a key and integrating theme of the regional spatial strategy (RSS) and be addressed in conjunction with the economic, social and environmental concerns that together inform the overall spatial strategy and its components. Do you agree?</p> <p>Explanation/comment:</p> <p><b>No comment.</b></p>		
<p>Q.4a The PPS expects regional planning bodies (RPBs) to consider the likely performance of RSS on mitigating climate change. In doing so, the PPS makes clear that this should be a key part of the sustainability appraisal, which should be used to identify and evaluate possible tensions or</p>		

Question and Response	Yes	No
<p>inconsistencies between current, or likely future, baseline conditions and securing RSS in line with the Key Planning Objectives in the PPS. Do you agree with the suggested approach?</p> <p>Q. 4b The PPS encourages RPBs, as part of their approach to managing performance on carbon emissions, to produce regional trajectories, to be set out in RSS, for the expected carbon performance of new residential and commercial development. Do you agree with the suggested approach?</p> <p>Explanation/comment:</p> <p><b><i>It is important that the Practice Guide clearly sets out in detail how the matter of climate change is to be specifically addressed through the Sustainability Appraisal process and how regional trajectories are to be produced.</i></b></p>		
<p>Q.5 We propose an approach to the identification and allocation of sites and areas for development in which priority should be given to those likely to perform well against the criteria set out in paragraph 19, and that those that perform badly should not normally be considered for allocation for new development. Do you agree with the suggested approach?</p> <p>Explanation/comment:</p> <p><b><i>Generally agree with the criteria except for the last one on known physical and environmental constraints. The need for the criterion is recognised and supported but it does not provide for exceptional circumstances (see my comments to Q.1). There may be certain locations where for wider sustainable development reasons, eg avoiding social and/or economic blight, exceptions to this criterion should be allowed.</i></b></p>		
<p>Q.6 The PPS expects local planning authorities to assess their area's potential for accommodating renewable and low-carbon technologies, including for micro-renewables to be secured in new residential, commercial or industrial</p>		

Question and Response	Yes	No
<p>development.</p> <p>Q.6a Do you agree that local planning authorities should consider allocating sites for supplying renewable and/or low-carbon energy and supporting infrastructure, taking care to avoid stifling innovation?</p> <p>Q.6b Do you agree that local planning authorities should ensure that a significant proportion of the energy supply of substantial new development is gained on-site and renewably and/or from a decentralised, renewable or low-carbon, energy supply?</p> <p>Q.6c Do you agree with the approach for setting out, in a development plan document, a significant proportion of the energy supply of substantial new development to be gained on-site and renewably and/or from a decentralised, renewable or low-carbon, energy supply?</p> <p>Q.6d Do you agree that in the interim period before “a significant proportion” is tested and defined through the preparation and adoption of a development plan document a standard of 10% should be applied?</p> <p>Explanation/comment:</p> <p><b><i>Agree in principle with the section in the PPS on 'Energy Supply' although it needs to be clearer on how the assessment should be undertaken. The capacity to allocate sites for supplying renewable and/or low-carbon energy and supporting infrastructure needs to be informed by a regional/local evaluation. This would provide the evidence base for determining the extent to which these allocations could realistically be made and implemented locally.</i></b></p> <p><b><i>A 'significant proportion' of the energy supply of substantial new development to be gained on-site and renewably and/or from a decentralised, renewable or low-carbon, energy supply needs to be defined more clearly.</i></b></p> <p><b><i>Whilst it is appreciated that the proportion may vary from</i></b></p>		

Question and Response	Yes	No
<p><b><i>area to area according to local circumstances and priorities, it would be helpful if a minimum target is set. Should the 10% be interpreted as a minimum proportion? The concern is that local planning authorities will interpret the 10% as a maximum requirement. The PPS should clearly state what the 10% represents, ie a minimum, not maximum requirement, and that local planning authorities should aim to secure a higher proportion when and where it is feasible to do so.</i></b></p> <p><b><i>The 10% standard should be clearly stated in the main text of the PPS - not just as a footnote or in an accompanying annex - and should also be fully justified. As it currently reads, the 10% appears to be almost arbitrary.</i></b></p> <p><b><i>Offsetting the impact of the majority (90% in the interim, before a 'significant proportion' is defined through the preparation of DPDs) of the supply of energy for substantial new developments from off-site non-renewable energy supplies needs to be addressed. Support needs to be stated in this section of the PPS for the securing, as part of development proposals, of carbon sinks including, for example the plantation of trees and other green vegetation either on/off site to off-set the impact of the energy supply for substantial new developments from off-site non-renewable sources. This section should also stress that off-setting the impacts of supplying energy to substantial new developments from non-renewable off-site sources should not be the recommended course of action in the first instance - developments should be designed to incorporate measures that enable a significant proportion of energy to be supplied on-site from renewable/low carbon sources.</i></b></p>		
<p>Q.7 The PPS forms part of a wider package of action being taken forward by the Department to help deliver the Government's ambition of achieving zero carbon development. This includes the Code for Sustainable Homes and a consultation document, <i>Building a Greener Future</i>, which sets out how planning, building regulations and the Code for Sustainable Homes can drive change, innovations and deliver improvements to the environment.</p>		

Question and Response	Yes	No
<p>Q.7a Do you agree that, for the reasons set out in <i>Building a Greener Future</i>, there should be a national strategy for regulating the emissions from buildings supported by local promotion of renewable and low carbon energy supply?</p> <p>Q.7b Does the framework that we describe give adequate room to authorities and developers to make best use of the opportunities available at different spatial levels, for example district heating and district cooling?</p> <p>Explanation/comment:</p> <p><b><i>A coherent joined up strategy needs to be clearly set out at a national level in order to provide a timeframe for when a number of the planning objectives on climate change can be realistically achieved. This is particularly helpful to know for the preparation of development plan documents.</i></b></p>		
<p>Q.8 Paragraph 35 of the PPS expects planning authorities to consider the environmental performance of proposed development, taking particular account of the climate the development is likely to experience over its expected lifetime. Do you agree with this approach?</p> <p>Explanation/comment:</p> <p><b><i>Agree, in general.</i></b></p> <p><b><i>Passive solar gain - Paragraph 35 needs to recognise and promote the valuable role passive solar gain can play in reducing the energy demands for heating and lighting of new developments. Through the layout, form and orientation of developments natural light and heat from the sun can be harnessed. This can be controlled through design measures to ensure that during the summer uncomfortable solar gain is avoided, eg installation of shutters/sun screen. Harnessing energy through passive solar gain does not necessarily imply unwanted solar gain in the summer.</i></b></p> <p><b><i>Sustainable Urban Drainage Systems (SUDS) - Paragraph 35 should also recognise and promote the potential wider benefits of implementing SUDS. SUDS can</i></b></p>		

Question and Response	Yes	No
<p><b><i>potentially perform a useful role in terms of wildlife habitat creation - this can help contribute to objectives identified in local Biodiversity Action Plans. Furthermore there may be scope for public amenity benefits to be achieved - these need to be taken into consideration, and where possibly addressed, in the design of SUDS as part of new developments.</i></b></p> <p><b><i>Checklist - Consideration should be given to galvanising the points in paragraph 35 into some form of checklist that could be used by local planning authorities when assessing the environmental performance of development proposals. It is recognised that a Code for Sustainable Homes has been developed but this only applies to dwellings. It would be useful if there was a checklist/code that could be used to assess the environmental performance of other forms of development.</i></b></p>		
<p>Q.9 We consider effective monitoring and review is essential in securing responsive action to tackle climate change. Do you agree that the expected annual monitoring should include outcome performance against the carbon performance trajectories or other yardsticks for identifying trends in performance, and renewables targets set in RSS?</p> <p>Explanation/comment:</p> <p><b><i>Further detailed advice on how this is to be achieved must be set out in the Practice Guide.</i></b></p>		
<p>Q.10 Do you consider the proposed scope of the practice guide (at Part 3) covers all the topics it needs to? If not what is missing, and why? Does the proposed scope of the practice guide include topics which don't need to be covered? If so which, and why?</p> <p>Explanation/comment:</p> <p><b><i>Details on how Sustainability Appraisals should address and measure the impact on climate change of developments should be clearly identified.</i></b></p>		

Question and Response	Yes	No
<p>Q.11 The Partial RIA (at Part 4) sets out the likely benefits and costs of the PPS, assessing two options, (i) the “do nothing” option and (ii) implementation of the PPS. Are these options viable? Would you add to/change the disadvantages/advantages of each? Are there any other options that should be considered?</p> <p>Explanation/comment:</p> <p><b>No comment.</b></p>		
<p>Q.12 The Partial RIA sets out potential impacts by stakeholder. Would you add to/change the impacts for each group? Are any stakeholders missing from the list?</p> <p>Explanation/comment:</p> <p><b>No comment.</b></p>		
<p>Q.13 The Partial RIA sets out the likely benefits and costs of the PPS. Do you agree with assumptions made? If not, it would be helpful if you could set out why not and any provide quantifiable evidence available to you on benefits and costs.</p> <p>Explanation/comment:</p> <p><b>No comment.</b></p>		
<p>Other comment:</p>		