

Planning Policy Statement: Planning for a Low carbon Future in a Changing Climate

Consultation Response

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Organisation: **Historic Towns Forum**

Public (individuals not affiliated to any group)

Business (including business trade associations)

Charities, environmental and community groups **X**

Government bodies (national, regional and local regional planning bodies, local authorities, government agencies and non-departmental government bodies)

Professionals and academics (including representative bodies for professionals)

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Please state whether you agree to your response being made public. **Yes**

General Comments

The responses of the Historic Towns Forum to the questions in the consultation document are set out below. However, the Forum has major concerns over a matter of principle. The draft concentrates on energy use and generation in development and there does not seem to be a single mention of the embodied energy in existing buildings and materials. This is especially important in the context of historic buildings. For example, the use of UPVC double glazing in listed buildings or unlisted buildings in a Conservation Area, may save energy in the short term, but can in the long term represent a greater impact on the carbon footprint because of the use/loss of embodied energy. This can become even more significant where whole buildings are demolished for redevelopment rather than refurbished. This is a major oversight as the very first step in the brand new WRAP toolkit *Designing out Waste: A design team guide for buildings* makes assessing the reuse potential of existing buildings and materials the very first step for designers. (http://www.wrap.org.uk/downloads/19279-02_Design_Guide_online_pdf_version.5f743a06.7167.pdf_p.18). We would further add that there is a lack of integration in government policy here: the differential VAT regimes on new building and restoration/refurbishment may well be working against a vital policy to reduce out carbon footprint.

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

Yes

Comment: *It is helpful to have the policy consolidated in one place for ease of use by practitioners.*

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

Comment: The PPS is commendably wide ranging in the way that it addresses the issues, but is very deficient in its coverage of embodied energy (see above) the historic environment (see below). These matters are barely acknowledged in the text.

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

Yes

Comment: This seems sensible given the priority accorded to sustainable development and climate change issues identified in PPS1. See answer to Q1 above.

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)?

Comment: No particular view on the technical side of this question. However, the principle of setting targets in regional strategies is right – many local authority areas will be too small to do this sensibly. This argues for a continuation of sound regional planning frameworks.

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

No

Comment: This imposes an additional responsibility on local planning authorities and it is far from clear whether they will have the skills and resources to do the work required. Resolving this will need to be evaluated against a clear methodology for carrying out the work, a methodology that will ensure consistency across all local authorities. It would be helpful if LCF1.5 explicitly says that this element of the evidence base should involve joint working across the boundaries of adjoining local authorities.

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?

No

Comment: These are undoubtedly important matters that must be taken into account. However, to adopt such a rigid approach runs counter to the more balanced method that underpins good land use, transport, economic and social planning, which takes into account a wide range of matters, each of which will be weighted by local priorities, in coming to a decision. To take just one example, would it be better to develop a Green Belt site compliant with LCF6.1 or a brownfield site where full compliance with LCF6.1 cannot be achieved? These are matters that

must be resolved at the local level and LCF6.1 may be seen to constrain the proper consideration of development opportunities through the Local Development Framework.

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?

No

Comment: *See 5 above.*

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

No

Comment: *It is not at all clear how this would apply in the case of Listed Buildings and other historic structures where the sustainability issues may be in direct conflict with heritage conservation.*

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?

Yes

Comment: *This must be done in such a way that the infrastructure respects townscape and environmental concerns, especially in Conservation Areas. There must be local discretion in how this is dealt with from a design perspective and should be spelt out in the proposed DPD. Such development should not in the future become permitted development.*

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?

No

Comment: *See the principles raised in 6 above.*

The opening sentence promotes well designed, sustainable buildings – which is unobjectionable. We would suggest it should go on to say is that these buildings (with all their necessary features) should be designed so that they are complementary to existing townscapes and that permission should not be refused (or indeed given) just because they are innovative.

As drafted LCF 13.4, devalues the very heritage context that the new PPS5 is seeking to promote by giving a trump card to any development claiming that some feature of development we might consider to be detrimental to the townscape is essential for climate change reasons. The caveat at the end of LCF 13.4 seems aimed squarely at specific high value assets only. There is no apparent requirement that the overall design addresses the negative impact – which is usually possible. For example, we hope no one still thinks that sticking micro windmills on their roof is worth their while, but if they do, and they assert that it is essential to achieve zero

carbon, we would appear to be required to accept that even if it has a significant and possibly cumulative damaging impact on the character of townscape, which could not be a reason for refusal.

The protection for high value assets should, of course, remain. However, it is important to ensure consistency with PPS5 and the possible dispensation in the final sentence should also apply to locally designated assets, e.g. locally listed buildings.

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?

No

Comment: See preceding comments made under 6 and 10. In LCF14.1 decision making must have regard to all PPS, not just this one.

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?

No

Comment: See 5 and 7.

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.

Comment: None.

Brian Human

Vice Chair Historic Towns Forum

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