



Planning Policy Statement: Planning and Climate Change

Analysis Report of Consultation Responses



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Faber Maunsell Sustainable Development Group

July 2007

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Introduction

1. Background

A public consultation exercise was carried out by Communities and Local Government on the draft Planning Policy Statement (PPS): *Planning and Climate Change*. The closure date for receipt of responses was 8th March 2007. Faber Maunsell Sustainable Development Group was contracted to analyse the responses received to the consultation exercise.

A total of 324 responses from different organisations were received and the analysis of these is contained in this report.

2. Methodology

The methodology for sorting and arranging the consultation responses received, is contained in a separate “Summary Report” on the consultation exercise. This explains how the responses were entered into the spreadsheet ready for the analysis.

The analysis was based on separate analysis of the responses to the 13 questions listed in the PPS consultation document. The statistical analysis is based on the number of respondents clearly indicating yes/no answers to questions and the proportion of the total of 324 responses received. Responses are broken down into the 18 organisation categories.

Whilst the statistical analysis gives an indication of the general response to the question, it may not in all cases fully represent the detailed responses, as many respondents added comments that qualified their response, and the simple yes/no answer seems to have been differently interpreted by different respondents. Considering the overall responses, it may be a question of whether the respondent saw the “glass as half full or half empty”, or alternatively whether they wished to be critical believing that this would mean that their comments would be taken more seriously, compared with an answer “Yes, but”.

To analyse the comments made by respondents, all comments listed in the spreadsheet were read and listings made of numbers of respondents making the same or similar comments. The results of this process are given in each of the following sections on each question.

Equal importance has in general been given to all responses, irrespective of their source.

It should be noted that some responses were made in great detail and suggested changes to the wording of the PPS, or suggested detailed changes to the content or new detailed proposals. These details were felt to be outside this analysis and have not been analysed in this exercise, though nevertheless these details may well be useful for those producing the final version of the PPS.

3. Overall response

The numbers of respondents by type of organisation are given in the table below.

Code	Organisation Types	Number	Percentages
c01	Developer	11	3.4
c02	Architect	0	0
c03	Engineer	6	1.9
c04	Building Control (Local Authority and private)	0	0
c05	Local planning bodies (GLA, Local Authority)	158	48.6
c06	NGO/Not for Profit Organisation/Campaigning Organisation/ Charitable Trust	39	12.1
c07	Manufacturers/Utilities/Waste	14	4.3
c08	Individual	12	3.7
c09	Professional Body/Trade Organisation/Local Planner/Planning Consultant	38	11.8
c10	Financial Institution/Insurance	1	0.3
c11	University and Research/BRE	4	1.2
c12	Construction Contractors	1	0.3
c13	Quasi Government (EST, CT, EP, etc.)/BBC	12	3.7
c14	Registered Social Landlords RSLs/Housing Associations	5	1.5
c15	Other	1	0.3
c16	Surveyor	0	0
c17	Regional Authority/planning and associated partnerships	22	6.8
c18	Political Parties (non Government)	0	0
	All	324	100

The responses are clearly dominated by local planning authorities, with nearly 50% of all responses. Professional bodies and NGOs, each with around 12% of the responses, and Regional Authorities with nearly 7%, are the only other organisations who responded in large numbers.

Many respondents only answered a few of the questions, or commented only on a few topics. This means that the percentages of respondents answering yes/no seems quite low but when this is compared with the percentage of respondents who did not give a specific yes/no answer the true significance is clearer.

On the first nine questions there is overwhelming support for the content of the draft PPS, from 4:1 in favour to 30:1 in favour, on the different questions. On the final four questions, which concerned the draft framework of practice guide and the partial Regulatory Impact Assessment, there were fewer responses but still general approval, bearing in mind that three of the questions (10,11 and 12) were asked in a negative way, requiring a negative answer to support the document.

In answers to many of the questions, respondents tended to stray away from the particular question and cover areas more relevant to other questions, and also to repeat comments and suggestions made in other answers. Thus, in reading through the analysis of each question given below, there is considerable repetition of ideas, but this has been included as the analysis of each question covers all the comments made in response to that question, as it was not felt appropriate in this exercise to ignore responses even if they might, in the opinion of the analysts, not be directly relevant to the question asked. The final summary chapter attempts to integrate the comments across all the questions.

There appeared to be only very small block responses, i.e. where several responses with identical wording were received, although in a few instances responses with the same wording were received from different organisations.

ANALYSIS

Question 1

Q1: 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 *Building a Greener Future* 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?

Code	Organisation type	Agree	Disagree	Don't know or Blank
c01	Developer	1	5	5
c02	Architect	0	0	0
c03	Engineer	3	0	3
c04	Building Control (Local Authority and private)	0	0	0
c05	Local planning bodies (GLA, Local Authority)	117	14	27
c06	NGO/Not for Profit Organisation/Campaigning Organisation/Charitable Trust	29	3	7
c07	Manufacturers/Utilities/Waste	9	0	5
c08	Individual	3	2	7
c09	Professional Body/Trade Organisation/Local Planner/Planning Consultant	18	7	13
c10	Financial Institution/Insurance	1	0	0
c11	University and Research/BRE	3	0	1
c12	Construction Contractors	1	0	0
c13	Quasi Government (EST, CT, EP, etc.)/BBC	6	2	4
c14	Registered Social Landlords RSLs/Housing Associations	3	0	2
c15	Other	0	1	0
c16	Surveyor	0	0	0
c17	Regional Authority/planning and associated partnerships	17	0	5
c18	Political Parties (non Government)	0	0	0
	All respondents	211	34	79
		65%	10%	25%

1. Statistical review

65% of consultees broadly agreed that the new policy and proposed practice guidance would secure planning strategies that would deliver reductions in emissions and shape sustainable communities that are resilient to the climate change now accepted as inevitable, with 10% disagreeing. Local planning authorities were in favour by 74% to 9% against. 45% of the developers disagreed with this statement. Of the consultees that disagreed the reason in most cases was that they did not think that planning policies alone will deliver reductions in emissions and sustainable communities.

2. Comments

The issues identified in this section have been put forward both by organisations who are in agreement with the question but have concerns over the detail and by organisations who disagreed with the question.

Existing Housing stock and non-residential sector

The most widely voiced concern was over the perceived exclusion of the non-residential sector and existing housing stock from the consultation proposals. Comments suggested that the PPS focuses on new-build residential developments and fails to recognise the significant reductions in emissions that can be achieved through refurbishing and reusing older buildings and areas.

39 respondents commented on this particular issue with almost half the respondents being local planning bodies.

Communities and Local Government note: The draft PPS sets out how spatial planning should contribute to reducing emissions and stabilising climate change (mitigation) and taking into account the unavoidable consequences (adaptation). It is intended to cover all development, which includes, but is not limited to, new housing.

Emissions from Transport

15 organisations, 8 of them local planning bodies expressed the opinion that the importance of CO₂ emissions from transport were not taken into sufficient account in the PPS. They felt that there is little in the PPS explaining how to enable people to reduce car usage by either minimising their trips or using public transport. One respondent suggested that the way to use the planning system to reduce car use is to give planning priority to car-free housing development: i.e. to allow car-free (and otherwise sustainable) housing developments in locations where car dependent housing developments are not permitted. Another respondent suggested that the Department for Transport needs to take effective action to deal with the comparative advantage of the car for long and short journeys.

Some respondents also noted that minimising the need for personal travel by locating new development in urban areas can reduce emissions. However it is not necessarily effective because, until the cost of motoring reflects the true environmental cost, individuals will have little incentive to work in their local area rather than commute elsewhere. Furthermore, even if individuals reduce their travel, the carbon footprint of transporting goods and utilities to them is highly significant. It was felt that for real progress on transport emissions, government will need to create incentives for localised rather than globalised production of food, energy, consumer goods, and water and waste treatment.

Allow local authorities to take the lead and set targets

15 organisations, 13 of them local planning bodies expressed the opinion that local authorities should have the flexibility to set their own environmental standards based on local circumstances and evidence, with those in the PPS and the Code for Sustainable Homes being a minimum. They contended that this would help to generate awareness on environmental issues and wider levels of community engagement. One respondent was concerned whether the new PPS would allow planning authorities to control the scale of development with respect to sustainability issues.

Several of the respondents expressed concern that local planning authorities will be restricted by the PPS from setting policies that would successfully cut carbon in advance of Government policies being implemented, and possibly losing the opportunity to create zero-carbon developments before 2016. There is concern that if this PPS is approved as it stands, it will prevent most councils from ever applying the energy saving parts of the Code for Sustainable Homes to private housing (this issue is discussed more fully in Question 7).

Conflicts and consistency with other policies

15 organisations, 9 of them local planning bodies expressed the need for there to be more consistency between the PPS and other policies, and several highlighted areas where there are potential conflicts with existing policies.

One particular area of perceived conflict was between the objective to reduce carbon emissions in the draft PPS and some other national policies, for example:

- the delivery of new housing development
- the Aviation White Paper
- recommendations emerging from the Barker Review arguing for a 'light touch' on commercial developments
- pressures to allow development in sensitive areas e.g. flood plains
- the positive policies and approaches to rural affordable housing recently published in PPS3 and the advice of the Affordable Rural Housing Commission.

In other policy areas it was considered that the following linkages need to be articulated:

- co-management of air emissions (carbon and local air pollutants)
- waste planning strategies: the aim to reduce methane production and reducing levels of waste to landfill could be made more explicit in the draft PPS
- policy guidance that encourages Combined Heat and Power Schemes should be linked with the potential for Energy from Waste technologies
- regional and local plans should be more closely integrated with the plans and programmes of other agencies concerned with land use, as is required by PPS11 and 12

- in the context of climate change the work of Natural England and the Environment Agency are particularly relevant. Joint action to prevent the emission of carbon dioxide through the erosion or burning of peat is a good example.

Other issues

Several other significant issues were raised:

- the little information provided on adaptation of existing buildings to be resilient to climate change
- in addition to the establishment of regional trajectories for carbon emissions the need for a more objective methodology for the assessment of impacts at regional and local level to enable analysis of the relative impact of differing development options on environmental change
- the poor availability of skilled professionals to implement the policy and the need for retraining
- the cost to developers and the impact this could have on affordable housing
- the apparent focus on development in urban areas. There was very little discussion about rural areas and how they can contribute to sustainable development.

3. Conclusions

More than half of the respondents agree that planning strategies can deliver reductions in emissions and shape sustainable communities. However, most provided the caveat that this PPS and proposed practice guidance are not sufficient in their own right. This was also the reason most frequently cited by the respondents who disagreed.

There is a strong feeling that the PPS needs to cover existing residential building, the non-residential sector (*see note in section 2*), and reflect more strongly the role that reducing transport emissions can have on the development of low carbon developments.

It is also felt that there needs to be more consistency with and linkage to other policy guidelines to ensure that conflicts do not arise.

Question 2

Q2: 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?

Code	Organisation type	Agree	Disagree	Don't know or Blank
c01	Developer	1	3	7
c02	Architect	0	0	0
c03	Engineer	2	2	2
c04	Building Control (Local Authority and private)	0	0	0
c05	Local planning bodies (GLA, Local Authority)	97	15	46
c06	NGO/Not for Profit Organisation/Campaigning Organisation/Charitable Trust	16	4	19
c07	Manufacturers/Utilities/Waste	5	2	7
c08	Individual	5	0	7
c09	Professional Body/Trade Organisation/Local Planner/Planning Consultant	19	2	17
c10	Financial Institution/Insurance	1	0	0
c11	University and Research/BRE	3	0	1
c12	Construction Contractors	1	0	0
c13	Quasi Government (EST, CT, EP, etc.)/BBC	6	1	5
c14	Registered Social Landlords RSLs/Housing Associations	2	0	3
c15	Other	1	0	0
c16	Surveyor	0	0	0
c17	Regional Authority/planning and associated partnerships	16	1	5
c18	Political Parties (non Government)	0	0	0
	All respondents	175	30	119
		54%	9%	37%

1. Statistical review

54% of consultees broadly agree with the Key Planning Objectives and Decision-making principles set out in the PPS with less than 10% disagreeing. Local planning authorities were in favour by 61% to 9% against. 29% of the developers and engineers disagree with this statement.

Of the consultees that disagree the primary reason was cited as lack of clarity or the request to incorporate additional objectives and principles.

2. Comments

Comments were raised about improvements to a number of the objectives and principles. These have been put forward both by organisations who are in agreement with the question but have concerns over the detail and by organisations who disagreed with the question.

Sustainable Transport

16 respondents commented on sustainable transport, with almost half the respondents being local planning bodies.

The most widely voiced concern was that of transport and rural areas. 10 respondents pointed out that the objectives only refer to patterns of urban growth and that they should reflect the wider needs of rural areas in developing their transport systems. Concern was expressed that as a result of this PPS applications for rural developments could be turned down on the basis of transport.

Biodiversity

15 organisations, 12 of them local planning bodies expressed a concern that the wording for the biodiversity objective was not strong enough.

There was support for a revision of the wording 'sustain biodiversity' to 'increase or encourage biodiversity'. Concern was expressed that the rate of development across the UK has put severe pressure on the UK's flora and fauna. An increase in the number of homes will have a negative impact on our biodiversity. Therefore any new developments should be planned not just to sustain biodiversity but to increase it through planting of trees to act as carbon sinks and provision of acceptable green space that attracts biodiversity and is not just a large stretch of grass.

In addition, it was suggested that reference needs to be made to biodiversity's ability to adapt, i.e. the planning system must ensure that key green corridors, through which species are able to move, are safeguarded in that event that climate change makes current habitats inhospitable.

Energy Provision

11 organisations, 6 of them local planning bodies expressed an opinion that more weight should be given to the provision of renewable energy and decentralised energy systems. Specific suggestions included that:

- the planning objectives should include an objective to address the need to move existing building stock away from a dependence on non-renewable energy sources as planning can constrain this process
- the third principle should be strengthened to require that all development, not just substantial development should consider issues of decentralized energy supply.

Concerns were expressed that point 2 in the Key Planning Objectives should be reworded to be more specific. It was felt that the phrase “*highest viable standards of resource and energy efficiency*” could be interpreted in different ways, which does not provide a helpful baseline for the provision of on-site renewables and other measures. A minimum standard should be set as a baseline requirement. Above this level, higher standards should be required unless there are considerable economic reasons for not doing so (i.e. viability), which should be identified within the PPS. Requiring all development to meet certain minimum criteria will help create markets for renewables and carbon-saving technologies, which is likely to improve viability for schemes. It was felt that in the final PPS there should be clarification as to what is the trade-off between making sure development is viable whilst securing the highest standards, which will develop future markets.

Adaptation

7 organisations expressed a concern that adaptation had only been included in a superficial way.

It should be clear in the principles that Regional Spatial Strategies (RSS) and Local Development Frameworks (LDF) incorporate policies to sustain, enhance and add to a healthily functioning natural environment as a key part of the mitigation and adaptation required to address climate change. This needs to form part of the RSS/LDF target setting and monitoring/review process.

Other issues

Several other issues were raised:

- in terms of controlled development on floodplains, it was felt that the PPS was too restrictive, and the PPS should provide a mechanism for providing greater local flexibility for areas that have limited land available for development
- an additional key planning objective could be added “*to protect and sustain water resources*”
- targets should be set for sustainable urban drainage systems
- the objective which discusses urban growth should also aim to protect and encourage green space which both enhances the aesthetic of an area, can help mitigate urban heat islands and can provide sustainable urban drainage.

3. Conclusions

Just over half of the respondents agreed with the Key Planning Objectives and Decision-making principles set out in the PPS. Of the consultees (9%) who disagreed, the main reason was cited as lack of clarity or a request to incorporate additional objectives and principles.

Question 3

Q3: 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?

Code	Organisation type	Agree	Disagree	Don't know or Blank
c01	Developer	1	2	8
c02	Architect	0	0	0
c03	Engineer	4	0	2
c04	Building Control (Local Authority and private)	0	0	0
c05	Local planning bodies (GLA, Local Authority)	97	2	59
c06	NGO/Not for Profit Organisation/Campaigning Organisation/Charitable Trust	17	0	22
c07	Manufacturers/Utilities/Waste	5	0	9
c08	Individual	4	0	8
c09	Professional Body/Trade Organisation/Local Planner/Planning Consultant	20	2	16
c10	Financial Institution/Insurance	1	0	0
c11	University and Research/BRE	3	0	1
c12	Construction Contractors	1	0	0
c13	Quasi Government (EST, CT, EP, etc.)/BBC	8	0	4
c14	Registered Social Landlords RSLs/Housing Associations	2	0	3
c15	Other	1	0	0
c16	Surveyor	0	0	0
c17	Regional Authority/planning and associated partnerships	15	0	7
c18	Political Parties (non Government)	0	0	0
	All respondents	179	6	139
		55%	2%	43%

1. Statistical review

55% of consultees agreed that climate considerations should be a key and integrating theme of the Regional Spatial Strategy (RSS), with only 2% disagreeing.

2. Comments

Of the consultees that disagreed there was no common reason for disagreeing.

Reasons cited were that climate change was not overarching, but should either be given equal weight with other factors, or included as part of the environmental factor.

In a similar vein, 9 other respondents who agreed with the proposal, had concerns over the weighting of the different factors and potential conflicts between climate change and the other factors.

3. Conclusions

The majority of consultees who chose to respond to this question were in agreement with the proposals. The consultees who disagreed did not raise any major objections.

Question 4

Q4a: 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 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?

Code	Organisation type	Agree	Disagree	Don't know or Blank
c01	Developer	2	0	9
c02	Architect	0	0	0
c03	Engineer	4	0	2
c04	Building Control (Local Authority and private)	0	0	0
c05	Local planning bodies (GLA, Local Authority)	81	0	77
c06	NGO/Not for Profit Organisation/Campaigning Organisation/Charitable Trust	12	0	27
c07	Manufacturers/Utilities/Waste	4	0	10
c08	Individual	5	0	7
c09	Professional Body/Trade Organisation/Local Planner/Planning Consultant	16	2	20
c10	Financial Institution/Insurance	1	0	0
c11	University and Research/BRE	2	0	2
c12	Construction Contractors	0	0	1
c13	Quasi Government (EST, CT, EP, etc.)/BBC	5	0	7
c14	Registered Social Landlords RSLs/Housing Associations	1	1	3
c15	Other	1	0	0
c16	Surveyor	0	0	0
c17	Regional Authority/planning and associated partnerships	15	1	6
c18	Political Parties (non Government)	0	0	0
	All respondents	149	4	171
		46%	1%	53%

Q4b: 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?

Code	Organisation type	Agree	Disagree	Don't know or Blank
c01	Developer	3	1	7
c02	Architect	0	0	0
c03	Engineer	4	0	2
c04	Building Control (Local Authority and private)	0	0	0
c05	Local planning bodies (GLA, Local Authority)	80	13	65
c06	NGO/Not for Profit Organisation/Campaigning Organisation/Charitable Trust	14	4	21
c07	Manufacturers/Utilities/Waste	4	0	10
c08	Individual	4	1	7
c09	Professional Body/Trade Organisation/Local Planner/Planning Consultant	14	7	17
c10	Financial Institution/Insurance	1	0	0
c11	University and Research/BRE	3	0	1
c12	Construction Contractors	1	0	0
c13	Quasi Government (EST, CT, EP, etc.)/BBC	6	0	6
c14	Registered Social Landlords RSLs/Housing Associations	2	1	2
c15	Other	1	0	0
c16	Surveyor	0	0	0
c17	Regional Authority/planning and associated partnerships	13	3	6
c18	Political Parties (non Government)	0	0	0
	All respondents	150	30	144
		46.3%	9.3%	44.4%

The different parts of the question are analysed together.

1. Statistical review

46% of consultees agreed that the performance of RSS on mitigating climate change should be a key part of the sustainability appraisal, and only 1% disagreed.

46% of consultees also agreed with the suggested approach of encouraging the RPBs, to produce regional trajectories, to be set out in RSS, for the expected carbon performance of new residential and commercial development. 9% of consultees disagreed with this approach.

2. Comments

Sustainability Appraisal

The following issues were raised over sustainability appraisal

- 2 organisations were concerned over how climate change could be fully integrated in the RSS at a relatively late stage in the process – as some RSS's have already been finalised
- 3 organisations said that the sustainability appraisal is not a decision making tool, and queried how conflicts would be resolved.

Carbon Trajectories

The issues raised over carbon trajectories were as follows.

Reasons for rejecting the setting of regional carbon trajectories in the RSS:

- 3 organisations thought that there should just be carbon trajectories set at a national level
- 1 organisation queried the benefits of using an average figure.

The following issues were raised over the details of regional carbon trajectories:

- 26 organisations commented on the methodology and data. The need to have a clear, consistent methodology for calculating carbon trajectories across all regional planning bodies was emphasised, with a suggestion that a national body should determine the methodology. The quality and availability of data that is to be used in the calculations is also a concern
- 7 organisations thought that the setting of carbon trajectories in the RSS should be made a “requirement” rather than just being “encouraged”
- 5 organisations thought that there was a need to have a monitoring framework. In addition, 2 organisations thought that developers of ‘substantial projects’ should have a legal duty to deliver on stated levels of carbon emissions as set out in planning approval documents. They considered that work needs to be checked and enforced, and where a development does not deliver, developers must be made to make necessary changes in order to deliver them
- the scope of the carbon trajectories raised a number of comments. 3 organisations thought that the trajectories should be limited to those sources of emissions over which regional or local authorities have some degree of influence. 4 organisations thought that the trajectories should include all development, not just residential and commercial. 3 organisations thought that the trajectories should include refurbishment and alteration of existing buildings. 2 organisations thought that the trajectories should relate to absolute performance in terms of total emissions and not just relative performance

- 3 organisations were concerned over how the trajectories would be used, as the consultation document only states that they will not be used to determine individual planning applications
- 2 organisations thought that local trajectories should be included in the Local Development Framework documents
- 4 organisations thought that there should be scope for individual local planning authorities to have different approaches
- 2 organisations thought that there should be minimum national standards.

3. Conclusions

Almost half the respondents agreed that the performance of RSS on mitigating climate change should be a key part of the sustainability appraisal, and that regional carbon trajectories should be set out in RSS.

The majority of concerns are over the details of how these carbon trajectories would be calculated and implemented.

Question 5

Q5. 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?

Code	Organisation type	Agree	Disagree	Don't know or Blank
c01	Developer	4	1	6
c02	Architect	0	0	0
c03	Engineer	3	1	2
c04	Building Control (Local Authority and private)	0	0	0
c05	Local planning bodies (GLA, Local Authority)	100	14	44
c06	NGO/Not for Profit Organisation/Campaigning Organisation/Charitable Trust	17	2	20
c07	Manufacturers/Utilities/Waste	4	2	8
c08	Individual	5	0	7
c09	Professional Body/Trade Organisation/Local Planner/Planning Consultant	17	3	17
c10	Financial Institution/Insurance	1	0	0
c11	University and Research/BRE	3	0	1
c12	Construction Contractors	0	1	0
c13	Quasi Government (EST, CT, EP, etc.)/BBC	7	2	3
c14	Registered Social Landlords RSLs/Housing Associations	2	0	3
c15	Other	1	0	0
c16	Surveyor	0	0	0
c17	Regional Authority/planning and associated partnerships	13	2	7
c18	Political Parties (non Government)	0	0	0
	All respondents	177	28	119
		55%	8%	37%

1. Statistical review

55% of consultees broadly agreed that the criteria set out in paragraph 19 for the identification of land for development should be given priority, with only 9% disagreeing with the proposal.

Regional and local planning authorities were both in favour by 59% to 9% for regional planning bodies and 63% to 9% for local planning authorities. No one group strongly disagreed with the proposals. In some groups the figures depict the proposals are very favourable, however this could be due to the number of respondents in those groups.

2. Comments

Many of the respondents are concerned with the public transport criteria being suggested in relation to access to rural locations. Some respondents felt that there are also potential tensions between the criteria identified in paragraph 19 and the approach in PPS3, which prioritises ‘delivery’ of new dwellings against a trajectory requirement of rural housing, which itself does not take account of the backlog of housing required in rural areas. There was also concern about the proposed caveat that in some cases, to meet the provision of affordable housing in rural areas, planning authorities should recognise that an otherwise acceptable site may not be readily accessible by means of travel other than the private car, so far as to promote sustainability a mixed tenure of housing would be preferable and not just a focus on affordable housing.

Approximately 10% of the local planning authorities wanted an element of flexibility for local knowledge to be included in the decision making process. A couple also commented on the fact that developments may be given the go ahead based on economic and social factors as well as environmental.

Flexibility to the approach was also requested by some manufacturers and utility providers, who commented that the criteria set out in paragraph 19 could be too simplistic for some types of development and that the decisions should not be given to the planning authority just on the criteria as there would be a number of external influences that would give rise to a site being more suitable for a given type of development than another, siting of power generation and waste centres in particular.

Questions were also raised as to how planners should weight the criteria listed when considering new proposals and whether there is an overriding issue that should be given precedence or how to reconcile competing demands for land allocation. Clarification on how to assess sites overall was requested and for it to be made clear whether a site that performs well on all but one point should still be rejected, especially given that there are often ways of mitigating potential impacts.

3. Suggestions

On at least 15 occasions further guidance and clarification was requested for the definitions of sites that ‘perform well’ and ‘perform poorly’, in such that cut-off points should be given within the PPS, to avoid constant confusion and challenges between local planning authorities and landowners as to what defines a sites performing ‘well’ or ‘poorly’.

It has been suggested that for clarity the section should refer to the “identification of land for development and redevelopment” and that more emphasis could be put upon redeveloping brownfield sites first.

4. Conclusions

In principle most of the consultees agreed with the approach suggested. However those that did agree requested more clarification on the definition of some of the criteria. This is perhaps appropriate as a part of the Guidance Document. The importance of local area knowledge in the decision making process needs to be considered by planners as well whilst also addressing other sustainability criteria that have not been included in paragraph 19.

Concern was also raised regarding perceived potential conflicts between parts of this proposed PPS and other PPS documents, notably PPS1, PPS3 and PPS7 and that this should be addressed to ensure a consistent approach.

Question 6

Q6a: 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?

Code	Organisation type	Yes	No	No answer or blank
c01	Developer	3	3	5
c02	Architect	0	0	0
c03	Engineer	4	0	2
c04	Building Control (Local Authority and private)	0	0	0
c05	Local planning bodies (GLA, Local Authority)	92	26	40
c06	NGO/Not for Profit Organisation/Campaigning Organisation/Charitable Trust	18	6	15
c07	Manufacturers/Utilities/Waste	6	3	5
c08	Individual	4	1	7
c09	Professional Body/Trade Organisation/Local Planner/Planning Consultant	17	3	18
c10	Financial Institution/Insurance	1	0	0
c11	University and Research/BRE	3	0	1
c12	Construction Contractors	0	0	1
c13	Quasi Government (EST, CT, EP, etc.)/BBC	5	1	6
c14	Registered Social Landlords RSLs/Housing Associations	2	0	3
c15	Other	0	1	0
c16	Surveyor	0	0	0
c17	Regional Authority/planning and associated partnerships	15	2	5
c18	Political Parties (non Government)	0	0	0
	All respondents	170	46	108
		52%	14%	33%

The different parts of the question are analysed separately.

1. Statistical review

52% of respondents agree that local planning authorities should consider allocating sites for supplying renewable and/or low-carbon energy and supporting infrastructure, however most have qualifying statements alongside their general agreement which are discussed below. 14% of respondents disagree with the statement, some having similar issues to those who responded yes. 58% of the local authorities who responded were in agreement with the statement (16% against, 23% no answer) whereas only 27% of the developers were in favour (27% against, 45% no answer). Regional planning bodies were 68% in agreement with the statement (9% against, 18% in favour).

2. Comments

Please note that where comments made under this question were more appropriate to another part of Question 6, the comments have been noted under the corresponding section but keeping the comment within the general 'yes' or 'no' section (as the majority of respondents were consistent across 6a-6d). This holds for all parts of section 6, as respondents were not disciplined at answering the question posed. It should also be noted that often the comments made by the 'yes' respondents were the same as the 'no' respondents, so the statistics are thought not to be a reliable guide of the feeling of the respondents. Whether they answered yes or no indicates whether they are a glass half full or half empty type.

3. Comments made by those that agreed with the statement – 'Yes, buts...'

Concern about the methodology and the resource issue

19 respondents were concerned by the methodology to be followed in order to carry out the assessments and requested clear guidance. There was also concern about the lack of resource in terms of money, staff and expertise to be able to carry out the assessment. It was queried why the assessment needed to be carried out at a local level, and suggested that perhaps it could be done at a sub-regional level to prevent reinventing the wheel (although this should be left to the local authority to decide). It was also queried whether the assessment was meant to be part of a Sustainability Appraisal or part of the evidence base collected for it, or whether it should be part of the scoping study for a DPD. The need for training was mentioned by a couple of respondents. One key stakeholder commented that sites for decentralised energy systems and other sustainable infrastructure should be both integrated as part of development and as environmental infrastructure that supports the wider functioning of communities and towns.

Synergy with waste planning allocations

7 respondents felt the site allocation approach was appropriate due to the synergy with allocation for waste management sites and due to the potential for waste to energy through anaerobic digestion etc.

Conflict with PPS22 (also see section 4)

7 respondents considered that this policy was at odds with PPS22 and that which takes precedence should be clarified, pointing out that PPS22 allows industry to come forward with appropriate sites.

Air quality issues

3 respondents requested appropriate guidance in relation to renewable/low carbon energy resources and air quality issues, particularly Air Quality Management Areas.

Carbon offsetting

There were comments in favour and against using carbon offsetting as an alternative to renewable installations, some regarding it as a cheap ‘cop out’ and others seeing it as a realistic alternative as long as on-site installations weren’t possible and if the offset funded local energy efficiency for example (or other local sustainable energy scheme). Improving existing buildings was mentioned by a small number of respondents both in terms of energy efficiency and encouraging renewables.

Pros/cons of site allocation

Some respondents were concerned that site allocation may lead to other sites being considered inferior for renewables. They did not want site allocation to prevent other, unallocated sites from getting planning permission for renewables. It was felt that it is hard to allocate sites in this way, and that the site suitability for renewables may change over time. It was thought that local planning authorities should only allocate sites if it would safeguard clearly suitable sites from other development but that it shouldn’t be compulsory for local planning authorities to do so. 4 respondents thought it would give confidence to developers having sites pre-allocated for renewables and should also speed up the planning process satisfactorily. It was thought that site allocation may be suitable for large scale renewables only (such as large scale wind). Some felt the allocation should be technology specific, others not. One respondent suggested it might be better to have a council vision for energy rather than site allocation.

Impact on landscape and townscape

There was concern about paragraph 22 bullet 5 giving developers a ‘blank cheque’ to install renewables in order to meet energy goals. It was felt that good design could help mitigate impact on landscape and that landscape assessments must be used positively. It was felt there was a conflict between promoting renewable energy and protecting conservation (and other) areas. Extensive growing of biofuels could have a serious effect on existing landscape.

Reduce energy demand first

6 respondents stressed the need to ensure that energy demands in buildings were reduced first before renewables were applied.

Other topics mentioned only once or twice included:

- use of green belt should be reconsidered in terms supporting the sustainability of existing and new developments
- role of ESCOs in delivering decentralised energy
- clarification of what is meant by ‘not stifling innovation’
- how the planning system can ensure that the renewables are implemented, used and monitored
- the need for more guidance on how to deal with rural areas

- the need for access and design statements to clearly lay out how a site is addressing energy, water, materials, waste etc.
- the need for flexibility regarding planning permission for solar and wind in conservation areas, giving a balance between energy and aesthetics
- the difficulty for on-site systems to supply wider needs. It may be hard enough to supply 10% of needs on-site
- the use of carbon off-setting.

4. Comments made by those that disagreed with the statement

Conflict with PPS22

17 respondents (including 3 key stakeholders) said that the new policy was in conflict with the one in PPS22 and they felt that criteria based policies as opposed to site allocation would ensure that the sites were appropriate in planning terms. They felt this method was inconsistent with encouraging the market to bring forward sites and may also place restrictions on opportunities for renewables to be delivered outside the allocated areas. One key stakeholder suggested that wind farm developers were in a much better position to identify good sites for wind compared to local authorities and others commented generally that local authorities did not have the appropriate skills. Also concern that it would restrict other, unallocated sites from getting renewable installed.

Resources

6 respondents did not think local authorities had the resources or expertise to carry out such site allocation exercises and felt that they would be of limited use anyway.

Value

There were a number of comments (10) relating to the value of such allocations – some suggesting that all sites are suitable for some sort of renewables and that it is unlikely they would be best concentrated in certain sites. It was also felt that there is too much uncertainty still around the efficacy of the technologies to know where they are most suited. A sixth suggested that it would be too expensive and complicated to carry out assessments properly as cumulative landscape and visual effects would need to be investigated, proximity to National Grid connections, wind speeds, etc. It would also depend on the technologies, it being easier to identify a good location for a biomass power station than a wind farm. It would therefore be best to assess suitability on a case by case basis.

Impact on landscape and townscape

There was some concern (4) about landscape designations as it was felt this was putting renewable energy outside the planning system. It was suggested that these bullets need clarification. There was also some concern about the protection of land adjacent to nationally designated landscapes and a request that paragraph 14 from PPS22 is referenced in the PPS to provide that protection.

It was suggested that bullet 5 could be reworded to ‘devise reasonable policies for minimising impact on landscape and townscape which will not effectively preclude the supply of certain types of renewable energy...’.

Other topics mentioned only once included:

- the need for flexibility to deal with urban design and orientation
- the need for definition of renewables and low carbon
- the concern that local authorities do not have the powers to ensure that necessary infrastructure is supplied to support decentralised systems.
- the need for the siting of developments to be an open, plan-led approach with community consultation
- concern that decentralised systems may be favoured over centralised even when future energy sources make the electricity from the National Grid low carbon.

5. Conclusions

The large majority of those that answered this question were in favour of the proposals, however it should be pointed out that almost all had qualifying statements to their ‘yes’ answer with a large number of issues and areas of qualification laid out. Many ‘yes, buts’ shared similar concerns with those that disagreed with the statement. The concept of site allocation was felt to be a good one, but there were many doubts as to whether it could be carried out effectively in practice.

Q6b: 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?

Code	Organisation type	Yes	No	No answer or blank
c01	Developer	0	3	8
c02	Architect	0	0	0
c03	Engineer	3	0	3
c04	Building Control (Local Authority and private)	0	0	0
c05	Local planning bodies (GLA, Local Authority)	95	10	53
c06	NGO/Not for Profit Organisation/Campaigning Organisation/Charitable Trust	19	0	20
c07	Manufacturers/Utilities/Waste	5	0	9
c08	Individual	5	1	6
c09	Professional Body/Trade Organisation/Local Planner/Planning Consultant	14	5	19
c10	Financial Institution/Insurance	0	1	0
c11	University and Research/BRE	3	0	1
c12	Construction Contractors	0	0	1
c13	Quasi Government (EST, CT, EP, etc.)/BBC	6	0	6
c14	Registered Social Landlords RSLs/Housing Associations	3	0	2
c15	Other	0	1	0
c16	Surveyor	0	0	0
c17	Regional Authority/planning and associated partnerships	16	0	6
c18	Political Parties (non Government)	0	0	0
	All respondents	169	21	134
		52%	6%	41%

6. Statistical review

53% of respondents agreed 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. 7% disagreed and 39% did not answer the question. 61% of local authorities answering the question agreed. All (16) of the regional authorities that answered the question were in favour. 50 respondents from the 'yes' category felt that the definition of substantial needed revising to include more development types and 28 of them felt 'significant' should be greater than 10%.

7. Comments made by those that agreed with the statement – yes, buts

Definition of substantial

50 respondents made a comment regarding the definition of ‘substantial’. Of these, 21 respondents felt that as defined, it will limit opportunities for smaller, infill type development to benefit from renewables. 18 respondents (including one key stakeholder) felt that ‘substantial’ should be dropped altogether so that renewables were provided for all scales of development. 4 respondents thought that local planning authorities should be able to decide on substantial means, 4 thought the definition should specifically refer to housing units. Others commented that the policy should include substantial refurbishment and that it should take into consideration local and regional variation.

Definition of significant

28 respondents commented on the definition of significant. Of these, 12 felt that ‘significant’ was an inappropriate word to use as 10% is not a significant percentage and that the percentage should be further moving councils towards zero carbon development. 4 respondents thought it should be increased over time, and one gave the example of Calderdale’s policy requiring 10% to 2010, 15% to 2015, 20% to 2020. 3 respondents felt the local planning authority should determine the percentage. Another commented that a different percentage might be needed for different development types. Two respondents wanted to know how pre-existing targets (which may be higher than 10%) would be affected.

Energy not carbon

7 respondents said it should be defined in terms of carbon not energy.

Source of renewables

5 respondents wanted it made clear that renewables must be appropriate to the site, and not transported a long way by fossil fuel vehicle (referring to biomass).

Relationship to other standards

8 respondents stressed that emission reductions through meeting renewables planning policy should be over and above building regulation emission reduction requirements. A key stakeholder queried how the significant proportion related to the higher standards being set through the Code for Sustainable Homes. 2 wanted the PPS to stress that building regulations should be seen by developers as a minimum standard, suggesting that the current wording implies that they are maximum standards.

Impact on landscape

Para 22, bullet 4 was of concern to 7 respondents who felt that it may prevent planning authorities rejecting potentially any renewable energy proposal no matter how inappropriate, inefficient or out of scale or character, it might be. They suggested a tighter form of wording which strengthens the presumption in favour of renewable energy schemes but is qualified by the need for these to be appropriate in terms of scale and location. Landscape and visual impact assessments were considered to be very important to protect designated areas.

Energy efficiency, renewables, decentralised

7 respondents referred to the importance of energy efficiency improvements being made before renewables were applied and 3 suggested that the PPS should set out a hierarchy, so that renewables on-site are always considered first, then decentralised, then off-site.

Off-site

There was some debate about the off-site option, with 9 respondents suggesting it was good to have the flexibility for difficult sites but there were queries as to how the contribution should be calculated if decentralised and off-site systems were allowed as well. Some however felt that it should only be on-site, as off-site removes the link with residents, a link which encourages more energy efficient behaviour. It was considered that tree planting should definitely not be allowed. More guidance was requested on what qualifies as an 'off-site' contribution and clarification should be given that buying 'green' electricity from the grid is not a substitute for on- or off-site generation. There was concern about how the planning authority could influence off-site energy generation that didn't fall within the planning application, though the LA should definitely decide if it was appropriate for a particular context. It was thought that support should be provided to facilitate off-site generation for smaller schemes, perhaps with some financial mechanism, otherwise it would be unlikely to go ahead.

Cost of renewables

4 respondents felt this policy will help reduce the cost of the technologies.

Guidance for local authorities

Guidance was requested to help local authorities deliver the policy by 7 respondents. A further 3 wanted clarification that the policy should take all energy uses on a site into account.

Cost

3 respondents were concerned about the potential cost of the policy, potentially making marginal sites unviable, putting up house prices and being unaffordable for social housing providers.

Monitoring

3 respondents were concerned about how the policy was going to be implemented, monitored and enforced, with particular concern about the cost and the difficulty of monitoring. A further 2 wanted the policy strengthened further so that it could not be balanced against other planning requirements.

Other comments included:

- training of householders and businesses was essential to ensure that renewable energy installations are used properly in the long term
- links to land management objectives such as wood fuel projects were required
- there was a need for “low carbon” to be defined, as natural gas is “low carbon” compared to grid electricity
- centrally generated low carbon electricity may be better than on-site or decentralised electricity generation
- there was a need for consistency between local planning authorities in same region.

8. Comments made by those that disagreed with the statement

Definition of substantial

There were similar comments (8) by those that disagreed with the statement compared to those that agreed, requesting a better definition of substantial. Of those, 7 thought the policy should apply to all types of development and one, a developer, thought 1000m² was too small a threshold. One thought the definition was too simplistic, and it should differentiate between different types of development such as retail and warehousing.

Carbon reduction not energy

9 respondents said that the policy should be about reducing carbon emissions not providing renewable energy installations as this provides more flexibility for the developer. One commented that the policy might not encourage decreasing demand first if the energy being used is considered renewable or free. Another said the PPS should indicate how the 10% must be calculated.

Other comments

- off-site generation should not be allowed, only on-site should be included
- advice was needed on how local planning authorities interpret regional targets for local use
- specific technical support will be needed to determine whether renewables are suitable, and whether or not they might make the development unviable
- there was a need to identify the most suitable renewables in a region, with a particular focus on the role of waste to energy
- the policies will lead to unreasonable demands being made for installations where renewables are not appropriate. Off-site renewables are a much better approach
- it is better to ensure that renewable energy sources are matched to new developments (e.g. so that heat from waste to energy plants, can be utilised)

9. Conclusions

The overall concept seems to be acceptable to most people but the definition of key aspects, such as to what type/size of development and what size the percentage savings should be, are not acceptable to most respondents. The comments of those disagreeing with the statement were generally the same as those agreeing, a total of 58 thought the policy should apply to smaller (or all) developments, including 8 who disagreed with the statement. 7 of the yeses and 8 of the nos said it should be a carbon target rather than a renewables target. Generally, clarity was requested about the policy in terms of its definition, how it is to be applied and its relationship to other targets.

Q6c: 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?

Code	Organisation type	Yes	No	No answer or blank
c01	Developer	0	3	8
c02	Architect	0	0	0
c03	Engineer	3	1	2
c04	Building Control (Local Authority and private)	0	0	0
c05	Local planning bodies (GLA, Local Authority)	93	7	58
c06	NGO/Not for Profit Organisation/Campaigning Organisation/Charitable Trust	19	0	20
c07	Manufacturers/Utilities/Waste	5	0	9
c08	Individual	5	0	7
c09	Professional Body/Trade Organisation/Local Planner/Planning Consultant	14	5	18
c10	Financial Institution/Insurance	0	1	0
c11	University and Research/BRE	3	0	1
c12	Construction Contractors	0	0	1
c13	Quasi Government (EST, CT, EP, etc.)/BBC	5	0	7
c14	Registered Social Landlords RSLs/Housing Associations	2	0	3
c15	Other	0	1	0
c16	Surveyor	0	0	0
c17	Regional Authority/planning and associated partnerships	14	0	8
c18	Political Parties (non Government)	0	0	0
	All respondents	163	19	142
		50%	6%	44%

10. Statistical review

50% of the respondents agreed with the approach for setting out in a development plan, that a significant proportion of the energy supply of substantial new developments is to be gained on-site and renewably and/or from a decentralised, renewable or low-carbon, energy supply. Only 6% did not, and 38% did not answer the question. However, many of those that answered positively to the general approach, had comments or queries about the detail. Comments made by the ‘yes, buts’ were often similar to the ‘nos’. For example, 12 of those that agreed with the approach said the target should be set at a national level, and 10 of those that disagreed said the same thing.

11. Comments made by those that agreed with the statement – yes, buts

Use national guidance

12 respondents felt that minimum levels should be set out in national guidance rather than needing local justification in a large number of development plans across the country. One commented that more should be done nationally to strengthen the commercial viability of systems.

Use SPD instead

6 respondents thought that using supplementary planning documents would be a quicker or better route than development plans. 2 respondents thought that the core strategy might be a better place for the policy, as unless the sites to be allocated could be promoted by industry through the consultation process of the LDF, unrealistic or unsound allocations could result.

District heating networks

8 respondents thought that local planning authorities should require developers to connect to existing district heating schemes. (These answers had similar wording and are therefore thought to be part of a group response)

Limit development?

3 respondents were concerned that difficult sites might be left undeveloped if there was an additional burden of renewables to bear. A further 5 were concerned that climate change issues will draw money away from affordable housing.

Para 23, bullet 1 ('have regard to overall costs'.)

5 respondents thought this bullet would allow developers to get away without installing renewables, they felt this should be removed, referring to other planning requirements that protect against environmental harm which cannot be avoided due to cost implications.

Methodology

A number of respondents (4) commented on the need for a clear methodology, as the evidence base would be hard to collect.

Other comments included

- local planning authorities should take a practical approach based on what is suitable for a particular location rather than blanket percentages
- the PPS should provide support for ESCos
- the PPS should include requirement for renewable heat targets (as well as renewable electricity).

12. Comments made by those that disagreed with the statement – nos

National target

10 respondents commented that there should be a national standard set rather than local authorities having to justify and calculate individual targets, this would also be easier for developers.

Use the building regulations

4 respondents said that the place for this policy was in the building regulations, not planning policy. A further 2 queried how the target percentage related to the building regulations.

Other comments included

- the policy was too aspirational and thus may not be possible on some sites
- will the policy be administered through section 106 agreements?

13. Conclusions

Only 6 respondents really addressed this question in their comments, commenting that they thought that the policy was better placed in supplementary planning documents rather than in development plans because it would get into the system quicker. The other major issue prompted by this question was whether the target should be set at a local level or national level.

Q6d: 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?

Code	Organisation type	Yes	No	No answer or blank
c01	Developer	3	0	8
c02	Architect	0	0	0
c03	Engineer	3	1	2
c04	Building Control (Local Authority and private)	0	0	0
c05	Local planning bodies (GLA, Local Authority)	71	39	48
c06	NGO/Not for Profit Organisation/Campaigning Organisation/Charitable Trust	12	8	19
c07	Manufacturers/Utilities/Waste	3	1	10
c08	Individual	3	3	6
c09	Professional Body/Trade Organisation/Local Planner/Planning Consultant	14	8	16
c10	Financial Institution/Insurance	0	1	0
c11	University and Research/BRE	1	2	1
c12	Construction Contractors	0	0	1
c13	Quasi Government (EST, CT, EP, etc.)/BBC	2	3	7
c14	Registered Social Landlords RSLs/Housing Associations	2	1	2
c15	Other	0	1	0
c16	Surveyor	0	0	0
c17	Regional Authority/planning and associated partnerships	11	4	7
c18	Political Parties (non Government)	0	0	0
	All respondents	125	72	127
		39%	22%	39%

14. Statistical review

39% of respondents agreed 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, 22% disagreeing and 39% not answering the question. However, 40 of those agreeing with the statement and 40 of those disagreeing with the statement thought that 10% was too low a figure – this is about 40% of those who commented on this question.

15. Comments made by those that agreed with the statement – yes, buts

Too low

41 respondents thought that 10% was too low a figure and that the PPS should be strongly encouraging local planning authorities to set higher targets than this. Some suggested areas with more development should have higher targets, others that higher targets should apply for residential developments.

Other comments included:

- there was a lack of clarity as to the relationship between regional and local percentages
- there was a need to set out assumptions behind the 10%
- there should be flexibility to ensure that the most suitable technology is used
- queries as to the length of the “interim period”?
- the 10% should be in main text not a footnote
- the 10% should be included within building regulations
- a renewable heat target should also be included

16. Comments made by those that agreed with the statement – nos

Too low

42 of the respondents thought that 10% was not ambitious enough, and that it should be ‘at least 10%’ if not a great deal higher (everything from 20% to 50% suggested). Most thought local planning authorities should be encouraged to set higher targets.

Relationship to building regulations

3 respondents stressed that any carbon saving through renewables should be in addition to any provided as part of building regulation compliance.

Why 10%?

3 respondents wanted to see the evidence behind requiring 10%.

Other comments included:

- the definition was unclear as to whether it includes off-site and low carbon sources
- the fear that statutory requirement will stifle local innovation

- what was the relationship between regional and local targets?
- minerals extraction should be exempt
- planning “conditions” shouldn’t be used to get things that should be integral part of a planning application.

17. Conclusions

83 respondents, whether or not they answered yes or no, felt that 10% was too low a target to be aiming for.

18. Overall conclusions on Question 6

This question has been hard to analyse as people have not been very organised in answering the different parts of question six in a very logical order. This means that the same issues have come up across Questions 6a to 6d and also whether they responded yes or no to a question.

Across the questions 58 respondents thought that substantial should be redefined to include smaller or all development and 110 respondents thought that 10% was too low an initial target to set.

Question 7

Q7a: Do you agree that, for the reasons set out in *Building a Greener Future*, there should be a national strategy for regulating the emissions from buildings supported by local promotion of renewable and low-carbon energy supply?

Code	Organisation type	Agree	Disagree	Don't know or blank
c01	Developer	4	0	7
c02	Architect	0	0	0
c03	Engineer	4	0	2
c04	Building Control (Local Authority and private)	0	0	0
c05	Local planning bodies (RDA, GLA, Local Authority)	89	9	59
c06	NGO/Not for Profit Organisation/Campaigning Organisation/Charitable Trust	14	0	25
c07	Manufacturers/Utilities/Waste	2	1	11
c08	Individual	4	0	8
c09	Professional Body/Trade Organisation/Local Planner/Planning Consultant	14	3	21
c10	Financial Institution/Insurance	1	0	0
c11	University and Research/BRE	3	0	1
c12	Construction Contractors	0	1	0
c13	Quasi Government (EST, CT, EP, etc.)/BBC	4	1	7
c14	Registered Social Landlords RSLs/Housing Associations	3	0	2
c15	Other	0	1	0
c16	Surveyor	0	0	0
c17	Regional Authority and associated partnerships	15	0	7
c18	Political Parties (non Government)	0	0	0
	All respondents	157	16	151
		48%	5%	46%

The different parts of the question are analysed separately.

1. Statistical review

48% of consultees agreed with the basic question that a national strategy with local support on renewable and low carbon supply was best, 5% disagreeing. Local planning authorities were in favour by 56% to 6% against. No group disagreed strongly with the proposal.

Reasons for answering no, were not against the idea of a national strategy but about the idea of local autonomy. 5 respondents objected on the basis that local authorities must not be stopped from setting higher standards (though many more local authorities made this point in their responses, see below). Other reasons covered a range of subjects but none were mentioned by more than one respondent, and most were about a specific details of planning or implementation.

2. Comments

Building regulations and local planning.

The most contentious issue is whether local planning authorities should be able to apply higher standards than the national standards, with respect to both energy efficiency standards and on-site renewable sources. Nearly 40 organisations, mostly local authorities, wanted to be allowed to set their own standards depending on local circumstances, whilst 6 organisations (developers and their professional bodies) wanted fixed national standards so that developers and builders knew what would be required everywhere. The local authorities felt that if they were restricted from setting higher energy standards if local circumstances allowed it, the PPS could have a negative effect on sustainability. Several local authorities either claimed that they already demanded higher standards or referenced authorities such as Merton and Woking who were known for their high standards. Developers felt that local authorities, if allowed to set their own standards, would make development more difficult and this might stifle development. Leaving the contribution of renewables to local control was supported by local authorities and regional planning bodies but there was some support for minimum levels being set nationally or regionally. Again, 6 organisations were against this, maintaining that a level playing field was best for the industry.

There seemed to be some confusion amongst consultees about whether the PPS was proposing nationally fixed energy performance standards, or whether local authorities would be able to set their own standards. There were also more than 15 comments that further clarification was needed of the respective roles of building regulations and planning, to avoid overlapping.

There were some comments on the definition of zero carbon developments, that it should be defined carefully. The proposal to include embodied energy was made strongly by at least 5 organisations, and a couple suggested that it was not appropriate to include energy use by appliances.

Other comments on planning and building regulations, were that standards were easier to impose via building regulations and that planning changes took a long time to feed into construction and thus that new regulations needed to be set up early to achieve zero carbon homes by 2016.

There was some mention of the conflict between “planning gain” and the requirement of developers to supply renewable energy on site.

Some developers were unhappy about the proposal to encourage joint planning and building regulation applications, as this would be more costly if the planning application was turned down.

Building regulations standards.

More than 12 organisations suggested that building regulations standards should be raised and 18 were very concerned that the PPS might be indicating that building regulations would be seen as a maximum standard, and not a minimum. This relates to the point above, if local authorities were not allowed to set their own higher energy standards, all developments would adopt minimum building regulations standards.

More than 10 organisations wanted the Code for Sustainable Homes integrated into building regulations, and some specifically mentioned that the Code should be mandatory for all new housing.

Other issues

Other issues raised by fewer than 10 consultees were:

- renewable energy was best addressed at a large scale, not necessarily at the local level.
- there was a need to enable easier grid linking of local renewable energy sources, if they were to be required in developments.
- non-domestic buildings should be included, along with new housing
- the energy use in the existing building stock should be addressed as a matter of urgency
- transport energy use should be included more fully in the PPS
- there are problems with the lack of in-house energy expertise in local planning authorities and more guidance and support was needed
- the incorporation of IT in buildings should have a higher profile as this would reduce travel and energy use.
- there were several suggestions that the construction industry should be more involved in sustainability and this was a necessary role for it.
- the possible difficulties with district heating were also mentioned in answer to this question (see 7b)
- caravan parks are not covered by the legislation.

3. Conclusions

The general concept of a national strategy for regulating emissions from buildings is widely accepted, with local promotion of renewable sources. However there is felt to be a need for more clarification of the respective roles and there is a hot debate about the powers that local authorities should have over both energy efficiency and renewables, within the national framework.

The importance of building regulations is recognised by all consultees, but there is great concern that the PPS as currently worded, suggests that they are a maximum standard, that local authorities cannot require to be raised, if local conditions allow.

There is considerable overlap between the answers to this question and others.

Q7b: 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?

Code	Organisation type	Agree	Disagree	Don't know or blank
c01	Developer	3	1	7
c02	Architect	0	0	0
c03	Engineer	1	2	3
c04	Building Control (Local Authority and private)	0	0	0
c05	Local planning bodies (RDA, GLA, Local Authority)	57	19	82
c06	NGO/Not for Profit Organisation/Campaigning Organisation/Charitable Trust	8	3	28
c07	Manufacturers/Utilities/Waste	2	1	11
c08	Individual	1	3	8
c09	Professional Body/Trade Organisation/Local Planner/Planning Consultant	8	3	27
c10	Financial Institution/Insurance	1	0	0
c11	University and Research/BRE	1	0	3
c12	Construction Contractors	0	1	0
c13	Quasi Government (EST, CT, EP, etc.)/BBC	1	1	10
c14	Registered Social Landlords RSLs/Housing Associations	2	0	3
c15	Other	1	0	0
c16	Surveyor	0	0	0
c17	Regional Authority and associated partnerships	9	3	10
c18	Political Parties (non Government)	0	0	0
	All respondents	95	37	192
		29%	11%	59%

4. Statistical review

29% of consultees agreed that the framework gave adequate room, with over 11% disagreeing. Local authority response was 36% in favour and 12% against. Some groups registered higher levels of opposition, engineers gave 33% against and individuals 25%.

Reasons for saying “no” focussed mainly on the issue of district heating (DH). DH issues included:

- more explanation of the best use of district heating was needed
- district heating was not appropriate to some user groups, e.g. the elderly
- the PPS should make connection to, or provision of, district heating mandatory
- district heating needed ESCos and these were not available

Other reasons for saying no, included that the PPS was too vague and did not give sufficient power to local authorities to affect sustainability.

5. Comments

District heating and cooling networks.

The specific issue raised in the question, district heating and cooling networks, generated several specific reactions. 20 consultees asked for more information about the suitable use and costs of district heating indicating a widespread lack of knowledge and understanding. This is an issue clearly relevant to the Practice Guidance document.

10 organisations were very doubtful about the application of district heating particularly in the more rural areas, and about whether it was a good idea.

5 organisations suggested that there would need to be a bigger role for ESCos in supporting district heating and that there was little experience of these in the UK yet. Finance requirements for district heating systems were specifically mentioned by at least 3 consultees.

However at least 19 organisations (mostly local authorities), who seemed to be in favour of district heating, wanted more power to be vested in local authorities to enable them to make developers link into existing local district heating networks or to provide or contribute towards them.

General responses

There were also calls for more information on making the best use of local opportunities, and again for more power to be given to local authorities to ensure that energy options were included in developments.

Other issues raised were those more relevant to other parts of the document:

- the need for more green spaces
- application to buildings other than houses
- the benefits of using carbon capture
- the need for co-operation with utilities to exploit and make local opportunities successful.

6. Conclusions

The general view was that the framework gives adequate room to authorities and developers, but both sides may be viewing this in different ways, due to the apparent flexibility in the wording of the PPS. The majority of the opposing views suggested that the PPS should be strengthened to give more power to local authorities, though this may not be surprising given that the majority of responses overall were from the local authorities.

District heating gets a mixed response both with respect to lack of experience and also with respect to the perceived difficulty of linking up different developments. However, in general the benefits of district heating seem to be widely accepted and local authorities would like greater powers to enforce its use. Rural and urban differences seem to be significant.

Question 8

Q8: 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?

Q8	Representative Group	yes	no	no answer or blank
c01	Developer	2	1	8
c02	Architect	0	0	0
c03	Engineer	2	2	2
c04	Building Control (Local Authority and private)	0	0	0
c05	Local planning bodies (GLA, Local Authority)	93	10	55
c06	NGO/Not for Profit Organisation/Campaigning Organisation/Charitable Trust	19	0	20
c07	Manufacturers/Utilities/Waste	3	0	11
c08	Individual	5	0	7
c09	Professional Body/Trade Organisation/Local Planner/Planning Consultant	17	4	17
c10	Financial Institution/Insurance	1	0	0
c11	University and Research/BRE	3	0	1
c12	Construction Contractors	0	1	0
c13	Quasi Government (EST, CT, EP, etc.)/BBC	6	0	6
c14	Registered Social Landlords RSLs/Housing Associations	2	0	3
c15	Other	1	0	0
c16	Surveyor	0	0	0
c17	Regional Authority/planning and associated partnerships	13	1	8
c18	Political Parties (non Government)	0	0	0
	All respondents	167	19	138
		52%	6%	43%

1. Statistical review

Of the responses approximately 52% of the consultees agreed that planning authorities should consider the environmental performance of proposed development but taking particular account of climate the development is likely to experience over its expected lifetime. Only 19 (6%) disagreed and there was no response from 36%.

Of the 158 local planning authorities 59% agreed with the proposals; against 6%. The only construction contractor group representative was against the proposals. Other groups were broadly in favour of the proposals.

2. Comments

On the whole the respondents welcomed the considerations for environmental performance which take account of climate. However a number of comments were raised over how this information is requested, provided, assessed and implemented.

Although data is available, it was recognised by respondents that it is not possible to know exactly how a site will be affected by climate change and to what degree over the expected lifetime of a development. Therefore, it is also important to ensure that developments are adaptable to take account of unexpected climate change impacts. This adaptability should be included in the list. Although appreciating the difficulties in accuracy, this led to several comments being made about having a suitable and recognised model which will offer a consistent approach to determining climate change. Respondents also commented on the variation in climate change that will be experienced in different parts of the country.

Many of the local planning authorities and regional planning bodies were concerned about the workload involved in assessing new applications which encompass all the requirements that are currently laid out in Paragraph 35 and requested consideration be given to how planners will be trained so as to have a better understanding of the impacts a proposed development might have as proposals are submitted. A further issue arising from Paragraph 35 is that there will need to be an authoritative climate change prediction model on which local planning authorities can rely in making their assumptions about the climatic conditions that are likely to be experienced over the lifetime of a development.

As well as time constraints in dealing with such detailed development proposals it was suggested on a number of occasions by the local planning authorities that there could be an opportunity for planners to draw on the technical expertise of building control colleagues in considering such matters and for there to be better integration of planning and building regulation applications. It was recognised by 3 local planning respondents that there is no weighting given to the various factors, which may be problematic for planners in assessing development proposals.

3. Suggestions

Several specific suggestions were made:

- the need for a robust model that will offer a consistent approach to predicting climate change
- the need for specific reference to public transport to be included within the bullet regarding sustainable transport
- good practice guidance to set out in specific terms precisely how climate related factors should be taken into account and what should be considered appropriate development or otherwise, in the context of the PPS
- the need to highlight that the list is not comprehensive so that further considerations that arise can be addressed at the decision making stage
- more engagement between planners and building control to share technical knowledge

- more positive effort to be given to enhancing biodiversity through development
- the benefit of establishing more sustainable behavioural patterns
- clarification of how far into the future the predictions on climate change should be taken.

4. Conclusions

The approach to designing for environmental performance and in particular climate change, was welcomed by the majority of respondents. However it has been noted that there are some areas which need to be strengthened and more detailed guidance of how to assess the impact of developments was requested. More importantly, the issue of having a suitable method of predicting climate change was requested across the respondents.

Question 9

Q9: 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?

Code	Organisation type	yes	no	no answer or blank
c01	Developer	1	3	7
c02	Architect	0	0	0
c03	Engineer	3	1	2
c04	Building Control (Local Authority and private)	0	0	0
c05	Local planning bodies (GLA, Local Authority)	89	9	53
c06	NGO/Not for Profit Organisation/Campaigning Organisation/Charitable Trust	18	1	19
c07	Manufacturers/Utilities/Waste	6	0	8
c08	Individual	5	0	7
c09	Professional Body/Trade Organisation/Local Planner/Planning Consultant	14	2	20
c10	Financial Institution/Insurance	1	0	0
c11	University and Research/BRE	2	0	2
c12	Construction Contractors	0	0	1
c13	Quasi Government (EST, CT, EP, etc.)/BBC	6	1	5
c14	Registered Social Landlords RSLs/Housing Associations	1	1	3
c15	Other	1	0	0
c16	Surveyor	0	0	0
c17	Regional Authority/planning and associated partnerships	14	1	7
c18	Political Parties (non Government)	0	0	0
	All respondents	161	19	144
		50%	6%	41%

1. Statistical review

Just over half of all consultees agreed that the expected annual monitoring should include outcome performance set against the carbon performance trajectories or other yardsticks for identifying trends in performance, and renewables targets set in RSS. The response from the Regional Authorities was more positive 64%, than from the local planning authorities 59%, also there is a higher percentage of local planning authorities that disagreed.

As a group of consultees, the developers were more against or did not comment on the proposals for monitoring of performance against carbon performance trajectories or other yardsticks.

2. Comments

In comments, 6% raised concern about who would undertake the monitoring, the work that this would involve and a lack of available resource or increased pressure on current resources. This issue was raised mostly by the local planning authorities. There were also requests for further guidance on how to set performance trajectories.

Some respondents are concerned about how the monitoring may be reported and one suggested that there may be an over projecting of figures in the “race to be green”. A number of respondents requested further guidance in how to calculate trajectories and called for a consistent approach to be taken.

A couple of respondents also questioned what, if any penalty would be imposed if the performance targets were not being met.

Concern was raised about how the monitoring might be undertaken and many respondents commented about the difficulties that might be experienced in trying to obtain data and monitor especially at the micro-generation level.

3 respondents commented on the need to extend this requirement from only buildings to include the impacts of transport on the carbon performance of developments.

3. Suggestions

Specific suggestions made included:

- there was a need for further guidance on setting of performance standards
- there was a need for a review of resources
- the PPS should include requirement for monitoring carbon performance from transport arising from a new development
- performance should be measured on a range of performance trajectories and not just carbon or renewables targets.

4. Conclusions

Whilst very few respondents objected, for those supporting the monitoring including performance trajectories, the main concerns raised were regarding the resources needed in order to undertake the monitoring, the need for further guidance on exactly how and what should be measured, and a consistent approach to the setting of performance trajectories.

Question 10

Q10a: 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?

Code	Organisation type	Yes	No	No answer or blank
c01	Developer	1	2	8
c02	Architect	0	0	0
c03	Engineer	1	2	3
c04	Building Control (Local Authority and private)	0	0	0
c05	Local planning bodies (GLA, Local Authority)	45	49	64
c06	NGO/Not for Profit Organisation/Campaigning Organisation/Charitable Trust	5	11	23
c07	Manufacturers/Utilities/Waste	1	2	11
c08	Individual	0	3	9
c09	Professional Body/Trade Organisation/Local Planner/Planning Consultant	8	9	21
c10	Financial Institution/Insurance	0	1	0
c11	University and Research/BRE	1	1	2
c12	Construction Contractors	0	0	1
c13	Quasi Government (EST, CT, EP, etc.)/BBC	1	6	5
c14	Registered Social Landlords RSLs/Housing Associations	2	0	3
c15	Other	0	0	1
c16	Surveyor	0	0	0
c17	Regional Authority/planning and associated partnerships	2	11	9
c18	Political Parties (non Government)	0	0	0
	All respondents	67	97	160
		21%	30%	49%

Q10b: Does the proposed scope of the practice guide include topics which don't need to be covered? If so which, and why?

Code	Organisation type	Yes	No	No answer
c01	Developer	0	0	11
c02	Architect	0	0	0
c03	Engineer	0	0	6
c04	Building Control (Local Authority and private)	0	0	0
c05	Local planning bodies (GLA, Local Authority)	2	1	155
c06	NGO/Not for Profit Organisation/Campaigning Organisation/Charitable Trust	1	0	38
c07	Manufacturers/Utilities/Waste	0	0	14
c08	Individual	0	1	11
c09	Professional Body/Trade Organisation/Local Planner/Planning Consultant	0	1	37
c10	Financial Institution/Insurance	0	0	1
c11	University and Research/BRE	0	0	4
c12	Construction Contractors	0	0	1
c13	Quasi Government (EST, CT, EP, etc.)/BBC	0	0	12
c14	Registered Social Landlords RSLs/Housing Associations	0	0	5
c15	Other	1	0	0
c16	Surveyor	0	0	0
c17	Regional Authority/planning and associated partnerships	0	1	21
c18	Political Parties (non Government)	0	0	0
	All respondents	4	4	316
		1%	1%	98%

For the second part of question 10 (described here as question 10b), there were very few responses and only one text comment (*It describes matters which will have a greater impact on climate change than those within the scope of the LPA.*) All other analysis refers to the first part of question 10 (described here as question 10a).

1. Statistical review

21% of respondents agreed that the proposed content of the practice guidance covers all the topics it needs to, with 30% disagreeing. Of the local planning authorities who responded, 29% agreed, and 31% disagreed with the scope of the proposed contents. It should be noted that an answer 'no' was allocated whenever a respondent gave a list of extra issues to be covered by the practice guide, even if they made a statement at the beginning of their answer that the coverage was comprehensive (or similar). There were 15 respondents (9% who gave a response to this question) who made such 'yes, but...' comments regarding the content of the practice guidance. It should also be noted that many of the topics mentioned by those in the 'no' category, were included in the outline framework.

2. Comments

Monitoring

21 respondents highlighted the need for clear guidance on monitoring. A number of different aspects of monitoring were referred to, including:

- the impact/carbon performance of policies
- what to monitor and how to monitor
- the likely budget and framework for monitoring implementation of renewable and low carbon technologies
- the relationship between what regional and local planning authorities are responsible for monitoring
- the emissions for carbon trajectories
- links to regional/local monitoring websites
- monitoring against regional targets
- resource implications for the required monitoring.

Adaptation

12 respondents requested further guidance regarding adaptation issues, with one being particularly vigorous, describing the guidance as '*severely lacking*' coverage on adaptation. Another requested guidance regarding the benefits of large scale habitat creation as a means of managing increased flood risk or controlling dangerous urban heating and another mentioned the importance of covering water efficiency and flooding.

Renewable energy

16 respondents asked for further guidance on renewable and low carbon technologies including the assessment of feasibility and suitability of sites with CHP, energy from waste, use of private wire and decentralised energy. 4 respondents asked for a matrix (or similar) to explain what renewables would work where, in terms of different development scales and contexts.

1 respondent felt that different percentage targets should be set for commercial and residential development, another that guidance is needed on how to deal with energy export/import across local authority borders. 3 respondents asked for help on how to plan for the infrastructure required for renewable energy and community heating systems. A couple mentioned the need for guidance on how to protect heritage areas, AONB, conservation areas, etc.

Sustainable transport

10 respondents mentioned more detail was required on sustainable transport, referring to guidance on pedestrian permeability, need for urban forms that reduce need for cars (scale, location and density), increasing use of public transport (particularly what to do in rural areas where car use is high and public transport provision is low), pedestrian access, parking, and cycling. In relation to this, a couple of respondents mentioned the need for data on emissions related to transport.

Carbon trajectories

10 respondents requested detailed guidance on how trajectories should be derived, measured and monitored, with an emphasis on a national methodology and what local planning authorities will be expected to contribute. One respondent queried how it was expected that carbon trajectories would influence policy making decisions, and another how carbon trajectories would kick in when regions were at different stages of developing their RSSs.

Water related

8 respondents requested guidance regarding use of water in a range of contexts, including setting targets for grey water recycling, sustainable supplies for green spaces, dealing with drought, flood risk reduction, water conservation and storage facilities.

Electronic format

7 respondents were very supportive of the idea of the guidance being available electronically for ease of access and with the expectation that it would be more easily updated. One respondent suggested it could be *'a living draft'*.

What should go in planning applications (particularly on energy)

6 respondents mentioned the desirability of a national checklist that could be used by local authorities in checking planning application details, to ensure that each development has been 'climate-proofed' and to ensure that all required information has been provided. Advice on how proposals will affect biodiversity was mentioned by a key stakeholder. One respondent suggested guidance should be provided for developers on how to achieve the proposed standards, particularly after planning permission is granted to ensure that key elements are not designed out.

A further 5 respondents asked for a checklist relating to assessment of energy use and renewables. One asked for *'help to do the maths'* and another said that they would *'appreciate guidance on how the predicted energy requirement of the development is to be assessed'*.

Biodiversity/ecology/landscaping

8 respondents made comments regarding the general issues of ecology, biodiversity and green space. Guidance on the need to enhance, sustain and restore biodiversity, develop green infrastructure and ecological networks and use of woodland and street trees for urban cooling were all mentioned, as was the review of permitted development to prevent the loss of gardens to hard paving. One respondent suggested that rules of thumb should be provided for the area of public and private open space that should be required on new developments.

Existing building stock

6 respondents commented on the importance of leveraging up the performance of the existing stock and welcomed guidance on this, although one queried how this can be done through the planning system as there is a lack of a mechanism to do it.

Building regulations and planning interface

4 respondents requested clear guidance on the relationship between planning and building regulations submissions, particularly on identifying what should be dealt with in the planning application and what should be dealt with by building control. Further explanation on how to facilitate 'integrated and timely decisions' was also requested, as was guidance on how/when local authorities can set higher standards than the building regulations.

Sustainable materials and energy efficiency measures

5 respondents including 2 key stakeholders referred to the need for guidance "*on low embedded energy and sustainable construction materials, energy efficient fixtures such as intelligent and natural lighting systems*". It is assumed that this was part of a group constructed response.

Urban cooling/heat island effect

4 respondents refer specifically to urban cooling or the heat island effect, and suggest that guidance on the use of open spaces and their role as carbon sinks/urban cooling, use of street trees and woodland could be provided.

Other topics

The following topics were mentioned 3 times or less by respondents, but are thought worthy of note:

- the difficulties of implementation in rural areas
- the benefits of looking to other countries for good practice examples
- the implications of zero carbon homes on regeneration and growth to be more fully developed
- guidance on the definition of 'substantial' was needed

- how can environmental performance be measured?
- how can environmental health and regeneration departments tackle climate change issues at source rather than mitigating through the planning system?
- the relationship between building massing, density and mix of development and its carbon emissions in context of guidance for preparing planning applications
- the role of ESCOs in implementing the PPS
- the training for members and officers so that sound decisions can be made
- the importance of putting more emphasis on a whole site approach rather than on individual buildings.

3. Recommended reference sources

1. Adaptation Strategies for Climate Change in Urban Environments (ASCCUE) undertaken by the University of Manchester's Centre for Urban and Regional Ecology (CURE).
2. 'Climate change adaptation by design guidance' undertaken by Acclimatise on behalf of the Town and Country Planning Association (forthcoming).
3. 'The SUDS Manual' produced by CIRIA.
4. ESPACE project and the EPSRC/UKCIP Building Knowledge for a changing climate portfolio of projects.
5. UKCIP02 climate change scenarios or the new UK scenarios, expected in 2008.
6. Climate adaptation: risk, uncertainty and decision-making" (UKCIP Technical Report May 2003).
7. Manual for Streets.

4. Conclusions

Despite the high percentage of respondents disagreeing that the framework for the guidance was complete, almost all of the subjects mentioned by the respondents are included in the draft framework of the practice guide. However, the repetition of these suggests that the guidance document should focus on these topics. A number of respondents commented that they felt they could not respond to the question regarding the guidance as there wasn't sufficient information provided.

Question 11

Q11a: 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?

Code	Organisation type	Agree	Disagree	Don't know or Blank
c01	Developer	0	0	11
c02	Architect	0	0	0
c03	Engineer	3	0	3
c04	Building Control (Local Authority and private)	0	0	0
c05	Local planning bodies (GLA, Local Authority)	38	12	108
c06	NGO/Not for Profit Organisation/Campaigning Organisation/Charitable Trust	10	3	26
c07	Manufacturers/Utilities/Waste	5	0	9
c08	Individual	3	1	8
c09	Professional Body/Trade Organisation/Local Planner/Planning Consultant	10	2	26
c10	Financial Institution/Insurance	1	0	0
c11	University and Research/BRE	0	1	3
c12	Construction Contractors	0	0	1
c13	Quasi Government (EST, CT, EP, etc.)/BBC	3	1	8
c14	Registered Social Landlords RSLs/Housing Associations	1	1	3
c15	Other	1	0	0
c16	Surveyor	0	0	0
c17	Regional Authority/planning and associated partnerships	3	4	15
c18	Political Parties (non Government)	0	0	0
All respondents		78	25	221
		24.1%	7.7%	68.2%

Q11b: Would you add to/change the disadvantages/advantages of each?

Code	Organisation type	Yes	No	Don't know or Blank
c01	Developer	0	0	11
c02	Architect	0	0	0
c03	Engineer	0	3	3
c04	Building Control (Local Authority and private)	0	0	0
c05	Local planning bodies (GLA, Local Authority)	9	40	109
c06	NGO/Not for Profit Organisation/Campaigning Organisation/Charitable Trust	5	8	26
c07	Manufacturers/Utilities/Waste	0	4	10
c08	Individual	1	2	9
c09	Professional Body/Trade Organisation/Local Planner/Planning Consultant	0	11	27
c10	Financial Institution/Insurance	1	0	0
c11	University and Research/BRE	0	1	3
c12	Construction Contractors	0	0	1
c13	Quasi Government (EST, CT, EP, etc.)/BBC	1	3	8
c14	Registered Social Landlords RSLs/Housing Associations	1	1	3
c15	Other	0	1	0
c16	Surveyor	0	0	0
c17	Regional Authority/planning and associated partnerships	0	7	15
c18	Political Parties (non Government)	0	0	0
	All respondents	18	81	225
		5.6%	25%	69.4%

Q11c: Are there any other options that should be considered?

Code	Organisation type	Yes	No	Don't know or Blank
c01	Developer	0	0	11
c02	Architect	0	0	0
c03	Engineer	1	2	3
c04	Building Control (Local Authority and private)	0	0	0
c05	Local planning bodies (GLA, Local Authority)	10	39	109
c06	NGO/Not for Profit Organisation/Campaigning Organisation/Charitable Trust	2	11	26
c07	Manufacturers/Utilities/Waste	0	4	10
c08	Individual	1	2	9
c09	Professional Body/Trade Organisation/Local Planner/Planning Consultant	1	10	27
c10	Financial Institution/Insurance	0	1	0
c11	University and Research/BRE	0	1	3
c12	Construction Contractors	0	0	1
c13	Quasi Government (EST, CT, EP, etc.)/BBC	1	3	8
c14	Registered Social Landlords RSLs/Housing Associations	0	2	3
c15	Other	0	1	0
c16	Surveyor	0	0	0
c17	Regional Authority/planning and associated partnerships	3	4	15
c18	Political Parties (non Government)	0	0	0
	All respondents	19	80	225
		5.9%	24.7%	69.4%

The separate parts of question 11 have been divided up for the purposes of these tables but the different parts of the question are analysed together.

1. Statistical review

24% of consultees agreed that these two options were viable, with only 8% disagreeing. 6% of the consultees thought that the advantages/disadvantages of these two options could be changed and 6% thought that some other options could be considered. The overall number of respondents answering this question was low.

2. Comments**Viability of the two options**

All the consultees who stated that both options were not viable agreed that it was the “do nothing” option that was not viable. The reasons cited were because:

- of the environmental and economic costs outlined in the Stern report (6)

- change is inevitable and already happening (4)
- of the Government's commitments made in the Climate Change Programme and the Energy Review (1).

Two of the consultees thought that the "do nothing" approach was not viable, but did however consider it to be an important baseline.

Advantages and disadvantages of the existing options

Other advantages and disadvantages that need to be considered for both options were considered to be:

- the costs and impacts of adaptation agenda
- the opportunities for farms to diversify into the renewable energy market including the growth of bio-fuel crops
- the costs of implementing any guidance on climate change
- the issue of fuel poverty and the impact of climate change on social exclusion and health
- the impact on rural areas
- the costs of a decrease in land values for residential development land and the impact on land supply
- the costs and benefits of refurbishment as an alternative to new build development
- the cost of additional delay in the planning process that may result from these proposals.

An additional disadvantage of the 'do nothing' approach was thought to be:

- the stifling of scientific innovation as cleaner technologies would not be developed.

An additional benefit of the 'do nothing' approach was that:

- local planning authorities may have greater local policy discretion to address climate change.

Additional benefit of the PPS option was that:

- renewable energy provides energy security from a fixed, stable supply, which also provides increased social benefits;

Other Options proposed

Of the consultees that thought that more options could have been considered, 7 consultees thought that more demanding options should be considered, such as:

- an option applying to all buildings new and old, domestic, retail, and commercial. (3)
- options giving more specific and demanding standards on carbon reduction, sustainable construction, renewable energy generation (2)
- an option that enabled local authorities to surpass these standards in their own area, should they see fit. (2)
- options of different CO₂ reduction scenarios in terms of the necessary interventions at different levels of CO₂ reduction. (11)
- a voluntary, non-statutory approach as a half-way-house (1)
- a modified PPS which provides a more simplified approach (2)
- an option that places more emphasis on aspects of development such as carbon footprint of material and appliances in the home (1).

It was pointed out that the economic analysis in the Stern report implied that more radical options could perform well.

3. Conclusions

The majority of consultees who chose to respond to this question agreed that these two options were viable, and all the consultees who disagreed considered the “do nothing” option not viable, because of the costs and that climate change is already happening.

Several alternative options were put forward for consideration most of which were for more demanding standards.

Question 12

Q12a: The Partial RIA sets out potential impacts by stakeholder. Would you add to/change the impacts for each group?

Code	Organisation type	Agree	Disagree	Don't know or Blank
c01	Developer	0	0	11
c02	Architect	0	0	0
c03	Engineer	2	1	3
c04	Building Control (Local Authority and private)	0	0	0
c05	Local planning bodies (GLA, Local Authority)	13	31	114
c06	NGO/Not for Profit Organisation/Campaigning Organisation/Charitable Trust	8	6	25
c07	Manufacturers/Utilities/Waste	0	1	13
c08	Individual	1	2	9
c09	Professional Body/Trade Organisation/Local Planner/Planning Consultant	5	5	28
c10	Financial Institution/Insurance	0	1	0
c11	University and Research/BRE	0	1	3
c12	Construction Contractors	0	0	1
c13	Quasi Government (EST, CT, EP, etc.)/BBC	0	5	7
c14	Registered Social Landlords RSLs/Housing Associations	0	2	3
c15	Other	0	0	1
c16	Surveyor	0	0	0
c17	Regional Authority/planning and associated partnerships	3	4	15
c18	Political Parties (non Government)	0	0	0
	All respondents	32	59	233
		10%	18%	72%

Q12b: Are any stakeholders missing from the list?

Code	Organisation type	Agree	Disagree	Don't know or Blank
c01	Developer	0	0	11
c02	Architect	0	0	0
c03	Engineer	1	2	3
c04	Building Control (Local Authority and private)	0	0	0
c05	Local planning bodies (GLA, Local Authority)	10	33	115
c06	NGO/Not for Profit Organisation/Campaigning Organisation/Charitable Trust	3	12	24
c07	Manufacturers/Utilities/Waste	1	0	13
c08	Individual	0	3	9
c09	Professional Body/Trade Organisation/Local Planner/ Planning Consultant	3	5	30
c10	Financial Institution/Insurance	0	1	0
c11	University and Research/BRE	1	0	3
c12	Construction Contractors	0	0	1
c13	Quasi Government (EST, CT, EP, etc.)/BBC	5	0	7
c14	Registered Social Landlords RSLs/Housing Associations	1	1	3
c15	Other	0	0	1
c16	Surveyor	0	0	0
c17	Regional Authority/planning and associated partnerships	1	7	14
c18	Political Parties (non Government)	0	0	0
	All respondents	26	64	234
		8%	20%	72%

The different parts of question 12 have been divided up for the purposes of these tables but are analysed together.

1. Statistical review

There was a relatively small response to this question, only 10% of all respondents thought that the impacts for each stakeholder group needed to be added to or changed, whereas 18% thought that they did not need to be amended.

In response to the second part of the question, 8% of respondents thought that there were stakeholders missing from the list, whereas 20% thought that the list of stakeholders was complete.

2. Comments

The additional positive and negative impacts for the stakeholders included the following.

Positive impacts for Developers

There will be benefits in terms of the marketing of more resilient and carbon efficient developments.

Negative impacts for developers

The costs to developers may only be transitional costs associated with improving their knowledge and approaches, such as in the re-design of standardised housing types.

Negative Impacts on Landowners

One respondent noted an inconsistency between this document and the “Building a Greener Future” document. The greener future document suggests that the main burden of the cost of the proposals is likely to fall ultimately on land owners, rather than developers or house purchasers, due to the way that costs are passed through the supply chain. The assessment of stakeholder impacts in this document attributes the cost of implementing the renewable and low-carbon energy technologies to the developers and stating that land owners will at best experience increased land prices and at worst will only experience marginal (and non material) decreases in land values.

Positive impacts for the general public

Two benefits were suggested. 5 respondents suggested that the health and productivity of the occupants will improve through occupying buildings with better temperature control and more natural light and 3 that they will benefit from the alleviation of fuel poverty and the maximisation of income through reduced energy and water bills.

Negative impacts for the general public

7 respondents suggested that increased costs are likely to fall on buyers and this raises affordability issues amongst some sectors of the community.

Negative Impacts for all stakeholders

One respondent suggested that the requirements for implementation and monitoring of the PPS together with the preparation of carbon trajectories may lead to delays in achieving the required goals. Another suggested that from a longer term view point (50 –100 years) the negative impacts may be considerably greater than suggested. 7 consultees thought that the higher housing costs should have been attributed to homeowners rather than to developers.

3. Missing Stakeholders

The following groups were mentioned as stakeholders currently missing. Most of them are only mentioned by one respondent:

- Spatial planning authorities should include all those influencing spatial development (e.g. Environment Agency, RDAs), and include advisors to infrastructure developers (3)
- Government departments with estates (1)
- Local Authority Building Control departments or NHBC Building control Officers (1)
- The home owner (3)
- Residents in areas exposed to coastal erosion risk (1)
- Black and minority communities (1)
- Insurance companies (1)
- Pension funds. (1)
- Utilities companies. (1)
- Built environment professionals. (1)
- Government Departments such as Defra, DTI, DfT and HMT (1)
- Government Agencies such as Environment Agency, Natural England, Highways Agency, Housing Corporation and English Partnerships (1)
- Local highways authorities and other local authority departments in addition to the LPA (1)
- Financial providers should include venture capitalists and other providers of development finance (1)
- Amenity organisations (1)
- AONB Joint Advisory Committees and others who respond to DPD consultations (1)
- Forestry Commission, Community Forests (1)
- Transport providers (1)
- Health and educational authorities (1)
- Charitable organisations who support the preservation of the natural environment (1)
- The suppliers of renewable, low-carbon technologies should include developers and managers or operators (1)
- Manufacturers of the technology, who may or may not be the suppliers at the point of installation (1)

4. Conclusions

Only a quarter of all respondents chose to respond to this question. Only one third of these thought that more stakeholders needed to be added to the list, or the impacts changed.

A large number of entities were identified as possible stakeholders, however there was no general consensus that any specific stakeholder had been omitted.

Question 13

Q13: 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 provide any quantifiable evidence available to you on benefits and costs.

Code	Organisation type	Agree	Disagree	Don't know or Blank
c01	Developer	1	0	10
c02	Architect	0	0	0
c03	Engineer	1	1	4
c04	Building Control (Local Authority and private)	0	0	0
c05	Local planning bodies (GLA, Local Authority)	30	12	116
c06	NGO/Not for Profit Organisation/Campaigning Organisation/Charitable Trust	4	3	32
c07	Manufacturers/Utilities/Waste	2	0	12
c08	Individual	2	1	9
c09	Professional Body/Trade Organisation/Local Planner/Planning Consultant	4	5	29
c10	Financial Institution/Insurance	0	0	1
c11	University and Research/BRE	1	0	3
c12	Construction Contractors	0	0	1
c13	Quasi Government (EST, CT, EP, etc.)/BBC	2	2	8
c14	Registered Social Landlords RSLs/Housing Associations	1	1	3
c15	Other	0	1	0
c16	Surveyor	0	0	0
c17	Regional Authority/planning and associated partnerships	5	3	14
c18	Political Parties (non Government)	0	0	0
All respondents		53	29	242
		16.3%	9%	74.7%

1. Statistical review

16% of consultees agreed with the assumptions made on costs and benefits and 9% disagreed.

2. Comments

Of the consultees that disagreed, few were able to provide quantifiable evidence to back up their comments.

Points made regarding costs included:

- the assumptions about local planning authority administrative costs are unrealistic. The costs for additional analysis of developer-provided information, will be higher (9)
- there are concerns over the use of a social cost of carbon of £70/tC. This figure refers to the year 2000, and is intended to rise by £1/tC per year in real terms to reflect the rising cost of emissions over time. The values used in the RIA need to be updated to reflect this (3)
- the environmental impact analysis of policies should consider the full range of emissions, based on the draft recommendation from DEFRA's Air Quality Expert Group (2)
- the costs for decentralized microgeneration of both heat and power have been underestimated compared to large scale centralized electricity generation (1)
- the opportunity costs of development foregone as a consequence of this PPS has not been considered (1)
- the assumption that the PPS could reduce the demand for travel and increase walking, cycling and public transport is not supported by evidence (1)
- the costs do not include the costs to the community of the potential loss of habitats and species (1)
- the possible cost savings of transporting freight/bulk materials by water have not been considered (1).

3. Conclusions

Only a quarter of the consultees chose to respond to this question. About two thirds of these agreed with the assumptions made.

9 of the local authorities thought that the administrative costs of dealing with this PPS are under estimated. 3 consultees questioned the figure used for the social cost of carbon; they thought that the higher figure used in the Stern report would be more realistic.

Conclusions

1. General response to the questions

Taking Question 1 as the overview of the principle of the PPS, there is a high level of support with the obvious caveat that, by itself, the PPS cannot solve the problems of the necessary reduction in CO₂ emission, nor create sustainable communities. There is cross organisation agreement on this by all, except developers, who in general think that too much pressure is being put on them and the new housing sector, compared with other sectors notably existing housing and non-domestic buildings. This theme is repeated not only by developers in answer to several questions.

The three questions (2,3 and 4) relating to the key planning objectives, regional spatial strategies and carbon performance management using trajectories are overwhelmingly supported, with very few objections. Comments particularly on planning objectives covered several of the general issues discussed below.

Again, the majority of respondents to Question 5 on sites for development, were positive, only 10% disagreed. Comments were at the level of detail, including the need for guidance on the weighting of the different criteria for selection and the need to consider particularly transport and the demand for affordable housing. There were suggestions of potential conflict with other PPSs.

Question 6, covering local planning authorities' proposed roles on renewable and low carbon technologies, stimulated many more negative answers and many suggestions for modifications to the draft proposals. On the first part, the allocation of sites, it was suggested that more guidance was needed, local authorities did not necessarily have sufficient or appropriate resources, and that the private sector might be better at assessing sites, e.g. for wind farms. The important suggestion was also made that any requirements should be based on carbon emissions and not "energy supply". There were many comments on the definitions of a "substantial" development and a "significant" proportion of energy supplied by renewables. With reference to the latter, most respondents thought 10% was too low.

In response to Question 7, there was general support for the proposals, with a significant number of local authorities and other organisations caveating this support with the desire for local flexibility. There was a difference of opinion (which also arose in response to other questions) about whether local planning authorities were being, and should be, allowed to require energy standards above those required by national controls, particularly building regulations. A substantial proportion of local authorities wanted to be able to set their own standards appropriate to local conditions, whilst most of those on the developers side wanted nationally applicable standards which would give "a level playing field" across the country. There seemed to be confusion on exactly what the PPS was proposing on this important issue. Several respondents thought that the PPS was suggesting that building regulations standards were being seen as a maximum and not a minimum as at present.

Question 8 proposes assessment of the future environmental performance of developments and this again received overwhelming support. However several important issues were identified by respondents, including recognition that this was not easy and needed inputs of an appropriate climate change model and guidance on what to assess and how this should be done.

The concept of annual monitoring of progress on tackling climate change proposed in Question 9 was supported by most respondents. This would require the input of more resources by local planning authorities and they wanted more guidance to achieve a consistent approach. An important issue raised would appear to be the difficulty in obtaining the necessary data.

Although there were several suggestions made in answers to Question 10 for additions to the guidance document, all were in fact already included in the draft framework. This demonstrates support for a comprehensive guidance document, as do several comments and requests for further guidance in response to other questions in the consultation document.

Questions 11, 12 and 13 relate to the partial RIA and what changes should be made. There were relatively few respondents to the questions posed and the vast majority of these agreed with the proposals, with some amendments and additions. There was some opposition to the use of the “do nothing” option as it was not an option that should be proposed and several more demanding options, were put forward. There were several suggestions for different impacts and a longish list of missing stakeholders, though this suggests individual interests as most were only put forward by single respondents. The most commonly mentioned area of additional costs was those to local planning authorities of implementing the PPS.

The RIA focuses the attention of the impacts that the PPS will have on the different stakeholders and it can be observed that the responses of these same stakeholders to the other consultation questions reflect their interests and the impact that the PPS will have on them.

2. Summary of recurring and significant themes

Several issues and themes recur throughout the responses to the different questions. Listed here are those issues that respondents thought had not been sufficiently considered in the draft PPS. It is accepted that some may be outside the intended scope of the PPS, but they reflect the priorities of respondents to the general topic under discussion. They are not listed in any particular order, certainly not in order of importance attached to them by respondents:

- The need to address carbon emissions from existing houses
- The need to address carbon emissions from non-domestic buildings
- The importance of transport emissions when designating sites and assessing development proposals
- The autonomy of the local planning authorities to set their own energy standards
- The issue of adaptation to climate change, the need for guidance and monitoring
- The lack of resources and skills on energy use and renewable energy, particularly within local authority planning departments
- The additional costs of implementing the PPS, to both local authorities and developers of the proposals

- The feeling that the PPS dealt primarily with urban developments and less with rural
- The lack of emphasis on biodiversity, the fact that it was constantly being reduced and there was a very important role for biodiversity as a carbon sink and sustainability factor
- Similarly the need to include landscape assessment in all planning particularly for renewables
- The importance of using brownfield sites in preference to green field sites
- The role of waste particularly as a renewable energy source
- The need to increase the use of ESCos to support the development of renewables and district heating and cooling
- The acceptability of off-site renewable sources to satisfy requirements and the benefits in terms of costs and effectiveness, linked to treating whole sites rather than individual buildings
- The need for caution and guidance on the use of district heating networks, and whether use should be mandatory
- The definition of zero carbon developments and the inclusion of appliances and embodied energy
- The incorporation of the Code for Sustainable Homes in building regulations
- The need to revise recently published RSSs to incorporate the new guidance
- The option of raising the energy standards for both energy use and renewable generation in building regulations, to reduce carbon emissions
- The importance of minimising energy demand before using renewable energy sources
- The use of renewable heat targets in addition to renewable electricity targets
- A focus on integrating information technology into new developments to reduce transport demand
- The need to use “carbon emissions” rather than “energy demand” in wording regulations
- The need to improve behavioural habits and use of buildings, to really reduce carbon emissions.

Potential conflicts with other documents, reports and policies was raised in answers to several questions. This included affordable housing, rural development, waste planning, other PPSs, etc.

Issues related to specific questions only, such as the RIA, have not been repeated here.