

Planning Policy Statement: Planning and Climate Change

Supplement to Planning Policy Statement 1

Comments by the Royal Institute of British Architects

Introduction

The Royal Institute of British Architects is one of the most influential architectural institutions in the world, and has been promoting architecture and architects since being awarded its Royal Charter in 1837. The 35,000-strong professional institute is committed to serving the public interest through good design. It also represents 85% of registered architects in the UK through its regional structure as well as a significant number of international members. Our mission statement is simple – to advance architecture by demonstrating benefit to society and promoting excellence in the profession.

General comments

We welcome the Government’s proposal to issue this planning policy statement as a supplement to PPS1. We are pleased that the Government intends that, just as PPS1 is the most authoritative of the PPS/PPG series, so should its new supplement have similar “supremacy” among its sibling documents.

The draft PPS has been issued as part of a broader package including the Code for Sustainable Homes and the Building A Greener Future consultation document. This conscious effort to pursue joined-up thinking also points to an increasing blurring of the respective roles of planning and building control when assessing the environmental performance of buildings. We would submit that building control should remain the focus for addressing building performance issues. Other issues, such as ensuring compliance with Building Regulations or accounting for post-occupancy behaviour will need to be addressed as more ambitious Building Regulations are brought forward. But that is not an issue for this response.

Summary

- Local planning authorities should be free to aim for higher building standards.
- The supplement should clearly state it applies to all building types
- The role of design quality should be clearly stated
- Proposals to look favourably on renewable energy are particularly welcomed
- Compliance and enforcement will require investment and skills development in local planning authorities

Detailed comments

Climate change and planning

This section is drafted around the UK Government's own domestic targets to reduce carbon dioxide emissions. It is noticeable, however, that the empowerment of local communities comes last among the benefits of positive spatial planning listed in paragraph 5. A less rigid redraft of this section would give local planning authorities the confidence to pursue their own carbon reduction targets if these are more ambitious than the Government's own national targets.

We suggest this section would also benefit from a clear statement that, as it takes precedence in the national series, this supplement to PPS1 is concerned with other building types beyond the domestic sector.

Key planning objectives

Paragraph 6 lists the key planning objectives for the policy statement. We strongly believe that high quality design is a crucial element in delivering sustainable buildings. Architects, for example, bring to projects a unique set of skills that are necessary to produce buildings that perform well, fulfil their function and are attractive. Similarly, there is a risk that design quality might be compromised if efforts to produce low or zero carbon buildings are made with undue haste or insufficient care.

The role of design is well expressed in the "parent" PPS1, which states:

"Planning policies should promote high quality inclusive design in the layout of new developments and individual buildings in terms of function and impact, not just for the short term but over the lifetime of the development. Design which fails to take the opportunities available for improving the character and quality of an area should not be accepted"

Because design quality is so central to the successful achievement of the Government's own targets, yet also at risk from less conscientious developers, we submit that paragraph 6 should contain a similar statement of the importance of design quality.

Energy supply

In 2005 the RIBA published *A Manifesto for Architecture*. Among its recommendations was the following:

- Make the planning system sympathetic to domestic renewable energy generation. The planning system should encourage people to run their homes with minimum impact on the environment.

For this reason we broadly welcome paragraphs 22-23, and in particular the encouragement to "look favourably on proposals for renewable energy". Renewable energy sources should be given particular emphasis.

At present, the definition of "low carbon energy sources" would include natural gas as

it is a low carbon source when compared with electricity, oil or coal. The current draft, therefore, would permit “business as usual” and result in no carbon reductions from energy use, and give insufficient incentives to develop zero-carbon energy sources.

Determining planning applications

Paragraph 28 currently says that “where proposals are inconsistent with the policies in this PPS, consideration should be given to how they could be amended to make them acceptable or, where this is not practicable, to refusing planning permission.”

We believe this is too weak. Local authorities need to be given the necessary tools to be able to refuse applications on the grounds that they are environmentally poor. We suggest that it should simply state “where proposals are inconsistent with the policies in this PPS, they should either be amended to make them acceptable or, where this is not practicable, planning permission should be refused.”

Responsibilities

There has been some concern that paragraph 31, which says that local authorities need not set their own standards above those set out nationally in the Building Regulations, might preclude local authorities from applying the energy saving parts of the Code for Sustainable Homes to private housing. The paragraph is certainly ambiguous and can be given that interpretation.

We believe that there should be nothing in the document which fetters local planning authorities’ ability to demand higher building standards than those set nationally. To do otherwise would not only run contrary to the spirit of the recent Local Government White Paper, but would also ignore the fact that the growing acceptance of the need to maximise building performance has come about thanks to the pioneering efforts of local planning authorities around the UK.

There is some inconsistency between paragraph 34, which effectively requires at least an element of energy to be supplied from on-site renewable sources for all new development, and the third bullet of paragraph 35, which places such a requirement only on substantial new development. At present, the latter is more realistic.

Compliance and enforcement

Much of the content of the proposed supplement to PPS1 is relatively new, and remains subject to rapidly changing technology and other factors. It is true that ensuring full compliance is important – but full compliance will require greater investment in skills and staff resources in local planning authorities. We supported Kate Barker’s recent call for greater investment in the planning system – and if efforts by local and central government to improve building performance are to be meaningful, this is absolutely crucial.