

LCH 25

Ymateb gan : Sefydliad Cynllunio Trefol Brenhinol (RTPI Cymru)
Evidence from : Royal Town Planning Institute (RTPI Cymru)

15 December 2017

Dear Sir/Madam,

Response to: National Assembly for Wales: Climate Change, Environment and Rural Affairs Committee's inquiry into Low Carbon Housing: the challenge

The Royal Town Planning Institute (RTPI) is the largest professional institute for planners in Europe, representing some 24,000 spatial planners. RTPI Cymru represents the RTPI in Wales, with 1,100 members. The Institute seeks to advance the science and art of spatial planning for the benefit of the public. As well as promoting spatial planning, the RTPI develops and shapes policy affecting the built environment, works to raise professional standards and supports members through continuous education, training and development.

The response has been formed drawing on the expertise of the RTPI Cymru Policy and Research Forum which includes a cross section of planning practitioners from the private and public sectors and academia from across Wales.

Thank you for the opportunity to contribute our views to the above Inquiry. It is important to recognise the potential role of planning, in the promotion of the sustainable urban form.

Planning needs to balance a number of different issues when granting consent for a wide range of developments. This means that planning is unable to solely focus on one specific issue. However, as planning policy evolves the importance of all development being 'sustainable' is increasing, as part of this more holistic approach different elements of energy efficiency are considered, but are still balanced against a number of other considerations.

RTPI Cymru believes that sustainable development must balance economic, social and environmental objectives to address the challenges of climate change. We are aware that higher standards do not always sit comfortably alongside economic impact and therefore consideration needs to be given to how best to build wider stakeholder support particularly in the development industry, taking into account impacts on development costs, viability, delivery etc. A step change is needed in understanding how good design can integrate low carbon housing and other development.

It is important that the process of designing a building takes on sustainable building standards as a central principle, rather than relying on potentially expensive renewable energy bolt-ons to meet energy savings. Building Regulations is the route for sustainable

building standards but issues such as siting and orientation etc. are best dealt with through the planning system. Both systems need to work closely together, ensuring roles are clearly defined to avoid uncertainty and duplication.

Planning has an important role in encouraging and facilitating buildings and urban design that meet high sustainability standards. The role of planning should be emphasised in expecting new development to contribute to energy efficiency, filling in any gaps left by building regulations to ensure higher environmental standards in new build, layout and site design etc., albeit the planning process considers developments in advance of building regulations.

We also recognise that there will be a need for requirements to be regularly reviewed in order that they keep pace with technology. Clearly 'green technology' is something which is currently changing very rapidly and is likely to continue to.

Planning should actively support the retro-fitting of energy efficiency improvements to existing stock, for example through playing a proactive role in urban regeneration schemes. Planning also plays an important role in guiding sensitive change to improve the energy efficiency of homes whilst also protecting the local distinctiveness and heritage of the area. To enable green growth, planning should be highlighted in promoting the infrastructure that is required for the development of a low carbon economy.

Outside of the remit of planning, but a disincentive to improving the existing building stock, is the VAT rating for work to existing buildings, as opposed to a zero rating for new build.

We would like to take this opportunity, while considering low carbon housing, to highlight the links between this and reducing energy consumption from transport. By influencing the location and density of new development, planning can reduce car travel and influence the level of demand on transport and journey distances to encourage walking and cycling.

Both planning and sustainable transport can make an important contribution towards the energy efficiency agenda. The connection between these and other policy areas is especially important in light of the Well-being of Future Generations (Wales) Act 2015. Whilst Welsh Government may not control all of the levers which impact upon transport-based energy consumption, as transport is a devolved function, through legislation such as the Active Travel (Wales) Act 2014, and decisions on transport investment, Welsh Government is in a position to have a significant influence upon the use of sustainable and less energy-intensive modes of transport. You may be interested in our recent RTPI Blog on Active Travel – "Time for Travel to get Active" - <http://www.rtpi.org.uk/briefing-room/rtpi-blog/time-for-travel-to-get-active/>

There are opportunities for higher standards to be delivered on strategic sites identified as part of the Local Development Plan (LDP), such as district energy schemes and integrated transport. However these can require cross-border / cross-LDP considerations, and there are timing issues due to the current position with regard to timescales associated with the adoption of these plans. Supplementary Planning Guidance could provide an opportunity to address major development issues to ensure connectivity, avoiding the above mentioned LDP timescale issues. Strategic Development plans are a further tool available which could help address these issues.

If you require further assistance, please contact RTPI Cymru on 029 2047 3923 or e-mail Roisin Willmott at walespolicy@rtpi.org.uk

Yours sincerely,

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