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Dear Ms Clifford

Re: IHBC Response: Consultation - Planning Policy Statement: Planning and Climate Change - Supplement to Planning Policy Statement 1

The IHBC welcomes the draft document and the Government's recognition of the importance of addressing global warning. All of the professions involved in place-making and in managing change, including urban design and conservation officers, need to address the problem of global warming.

However we are concerned that neither this draft, nor the parallel consultation *Building a Greener Future*, consider the potential Historic Environment impacts which will arise not only from global warming, but also from the measures now proposed. The IHBC's particular concern is the positive management of change, including the development of approaches and solutions to both meet the challenges of climate change, and (as far as possible) preserve or enhance the historic environment. New developments such as BedZed show how these challenges can lead to new and successful design languages. This is far less likely for improvements to existing buildings, where incremental alterations may be very damaging to the character of the building and its context.

Specific cross-referencing to paras 17-20 of PPS 1 and to PPG 15 would help to this document's aims and provisions into a historic environment context.

Q.1 *There is an urgent need for action on climate change and we consider that, used positively, spatial planning has a pivotal and significant role in addressing this challenge. We will provide practice guidance to help implement the planning policy for climate change set out in the PPS. Read together, and as part of the wider package of action being taken forward by the Department in 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?*

The new guidance will help to deliver reductions in emissions, and is welcomed. However, the draft document suffers from a fundamental omission. It focuses on new-build development and therefore fails to recognise the significant reductions in emissions that can be achieved through refurbishing and reusing older buildings and areas.

Even the construction industry recognises the potential impact on climate change of managing existing built resources more effectively. Its Sustainability Forum notes that:

> 'The UK construction industry consumes more than 400 million tonnes of materials each year and generates over 100 million tonnes of waste. Around 30 million tonnes each year ends up as construction waste going straight to landfill.'

Similarly, English Partnerships notes that:

> 'Construction materials account for over 50% of materials consumed in the UK, and their manufacture produces 20% of UK CO2 emissions'.

The BREtrust paper 'Sustainable refurbishment of Victorian housing' (2006) provides substantial case studies of the benefits, real and strategic, even under the current fiscal climate which militates so much against such sustainable initiatives through such unsympathetic policies as the imposition of VAT on repairs *etc*. BRE's earlier paper on *Sustainable Refurbishment* IP9/02 'concluded that, typically, refurbishment is lower in both environmental and whole-life cost impacts than redevelopment'.

While focussed on historic buildings, the ODPM Committee report on *The Role of Historic Buildings in Urban Regeneration* (29 July 2004) strongly criticised the impact of unsympathetic fiscal structures, recommending that:

> 'The tax system needs to favour the preservation and reuse of historic buildings rather than deter it. The imposition of VAT on the repair of historic buildings whilst newbuild projects are exempt deters developers from taking on complex projects involving historic buildings and runs counter to the Government's sustainability agenda and its policy on promoting the reuse of historic buildings'. (Recommendation 23).

It concluded that:

> 'The VAT treatment of construction work on historic buildings is perverse and provides a disincentive to projects involving their reuse and goes against the Government's sustainability principles'.

Benefits of using existing buildings and structures – historic or otherwise – to frame emission-reducing strategies include:

- Avoiding the loss of the huge investment of energy and resources associated with the manufacture of building materials and construction of a building (embodied energy)
- Avoiding landfill.
- Avoiding further use of energy required for demolition, manufacture of new building materials, and construction of new development.
- Older areas that have developed incrementally usually support a finer grain of mixed use than areas that have been comprehensively redeveloped, reducing the need for journeys to be made.
- There is evidence to suggest that older buildings require less ongoing investment in maintenance than newer ones.
- Refurbishment of older buildings and areas, especially those of heritage value, usually acts as a catalyst for the wider regeneration and reuse of derelict and declining towns and city quarters, including inner-cities and traditional manufacturing areas.
- At the same time as reducing emissions, refurbishing older areas helps provide the infrastructure to cater for the needs of small businesses, innovation and creative industries, helping local economies to transform and modernise.
- In addition, older areas are able to better support community facilities and to cater for diversity, especially specialist retail such ethnic fashions and affordable IT.

Refurbishment often comes closest to reconciling the needs of environment, economic growth and local communities. The guidance should require local planning authorities to consider refurbishment options as an alternative to redevelopment. This should be accompanied by fiscal reform to encourage refurbishment, in particular the classification of building refurbishment as 'on-site recycling' in terms of the recent PDG consultation, and reduction of VAT on sustainable strategies such as repair.

The IHBC calls for immediate and substantial research into the long-term environmental, social and economic benefits of refurbishment over reconstruction across the sector and the UK, to be funded and promoted by bodies such as The Carbon Trust and EPSRC, to inform the strategies explored in this and related consultations.

Q.2 *The PPS sets out Key Planning Objectives and Decision-making principles for the preparation and delivery of spatial strategies by regional planning bodies and all planning authorities. Do you agree with these?*

IHBC agrees with the key objectives and decision making principles. However, as discussed above, they need to be accompanied by recognition of the benefits of

refurbishment often as a preferable alternative to comprehensive redevelopment (see answer to 1).

Q.3 *It is proposed that climate considerations should be a key and integrating theme of the regional spatial strategy (RSS) and be addressed in conjunction with the economic, social and environmental concerns that together inform the overall spatial strategy and its components. Do you agree?*

IHBC agrees with the proposal to incorporate climate considerations into regional spatial strategies. It is essential that regional economic strategies be better integrated with regional spatial strategies. Addressing climate change should be a key objective for regional development agencies and other regeneration organisations at all levels.

Q.4a *The PPS expects regional planning bodies (RPBs) to consider the likely performance of RSS on mitigating climate change. In doing so, the PPS makes clear that this should be a key part of the sustainability appraisal, which should be used to identify and evaluate possible tensions or 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?*

IHBC agrees with the suggested approach. However, consideration needs to be given on how to better integrate transport planning with spatial planning.

Q.4b *The PPS encourages RPBs, as part of their approach to managing performance on carbon emissions, to produce regional trajectories, to be set out in RSS, for the expected carbon performance of new residential and commercial development. Do you agree with the suggested approach?*

IHBC agrees with the suggested approach.

Q.5 *We propose an approach to the identification and allocation of sites and areas for development in which priority should be given to those likely to perform well against the criteria set out in paragraph 19, and that those that perform badly should not normally be considered for allocation for new development. Do you agree with the suggested approach?*

The criteria in paragraph 19 should place greater emphasis on the need to consolidate and reinforce existing town and city centres as the most sustainable location of retail and other appropriate facilities.

Q.6 *The PPS expects local planning authorities to assess their area's potential accommodating renewable and low-carbon technologies, including for microrenewables to be secured in new residential, commercial or industrial development.*

Q.6a*Do you agree that local planning authorities should consider allocating sites for supplying renewable and/or low-carbon energy and supporting infrastructure, taking care to avoid stifling innovation?*

IHBC agrees with such allocations. However these should be coupled with the strongest possible emphasis on designing to reducing demands for energy.

Q.6b*Do you agree that local planning authorities should ensure that a significant proportion of the energy supply of substantial new development is gained on-site and renewably and/or from a decentralised, renewable or low-carbon, energy supply?*

This matter needs to be considered on an area-by-area and site-by-site basis. For much new development, it should be possible to incorporate on-site energy generation. On landscapes without special designations, this approach will often be appropriate. It may also be possible to incorporate on-site generation in more sensitive areas, though careful and sensitive and creative design will be necessary. However, it would be inappropriate to incorporate high visual impact energy generation schemes in areas with special landscape or townscape designation, such as national parks and many conservation areas.

Q.6c*Do you agree with the approach for setting out, in a development plan document, a significant proportion of the energy supply of substantial new development to be gained on-site and renewably and/or from a decentralised, renewable or low-carbon, energy supply?*

Yes, subject to this being coupled with using development plans to promote minimizing the energy demands of new developments, on a whole life-cycle basis..

Q.6d *Do you agree that in the interim period before "a significant proportion" is tested and defined through the preparation and adoption of a development plan document a standard of 10% should be applied?*

It is difficult to comment without more explanation of how the figure is derived.

Q.7 *The PPS forms part of a wider package of action being taken forward by the Department to help deliver the Government's ambition of achieving zero carbon development. This includes the Code for Sustainable Homes and a consultation document, Building a Greener Future, which sets out how planning, Building Regulations and the Code for Sustainable Homes can drive change, innovations and deliver improvements to the environment.*

Q.7a *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?*

As set out in question 1, loss of embodied energy and landfill through demolition, together with the further investment of energy for manufacture and construction for new development, need to be taken into account, providing comparison, on a whole life-cycle basis, between new development and refurbishment options. If this principle is met, IHBC could agree with proposal. However, in the opinion of the IHBC there has been insufficient study of the importance of valuing embodied energy, real costs of waste production (including on-site recycling though demolition), unsympathetic fiscal frameworks (e.g. VAT on repairs), and leading conservation control infra-structure in planning authorities to justify such a strategy for the foreseeable future. In order to address this issue effectively, there is an urgent need to investigate the real benefits and opportunities of applying historic environment conservation strategies across the entire built environment.

Q.7b *Does the framework that we describe give adequate room to authorities and developers to make best use of the opportunities available at different spatial levels, for example district heating and district cooling?*

No response.

Q.8 *Paragraph 35 of the PPS expects planning authorities to consider the environmental performance of proposed development, taking particular account of the climate the development is likely to experience over its expected lifetime. Do you agree with this approach?*

IHBC strongly supports a lifetime-based approach, provided that this includes energy use in construction and disposal (i.e. a whole life-cycle approach). . We have a specific criticism of the second provision, as drafted, of paragraph 35, which does not address the energy issues (which will increase) arising from *air conditioning*: current reliance on energy-intensive mechanical systems needs to be changed through a much stronger emphasis on natural, as opposed to mechanical, ventilation in both existing and new buildings.

However, this approach will also need to be accompanied by fiscal and other incentives in order to make developers consider lifetime costs rather than just the capital costs of development. Without such incentives, minimising construction costs will continue to take precedence over green construction and energy efficiency.

Q.9 *We consider effective monitoring and review is essential in securing responsive action to tackle climate change. Do you agree that the expected annual monitoring should include outcome performance against the carbon performance trajectories or other yardsticks for identifying trends in performance, and renewables targets set in RSS?*

As discussed in question 1 above, loss of embodied energy and landfill through demolition, together with the further investment of energy for manufacture and construction for new development, need to be taken into account, providing comparison between new development and refurbishment options. Outcomes need to be monitored on a development-by development basis, to ensure that aims are achieved.

Q.10 *Do you consider the proposed scope of the practice guide (at Part 3) covers all the topics it needs to? If not, what is missing, and why? Does the proposed scope of the practice guide include topics which don't need to be covered? If so which, and why?*

As set out above, it is essential that refurbishment be encouraged as an option, taking account of factors such as embodied energy implications, existing mix of uses, etc. The practice guide should include implications for the Historic Environment; it should be cross-referenced to PPG 15 (and, when available, the forthcoming PPS15), together with specific guidance on good practice, building on English Heritage's Interim Guidance on Part L of the Building Regulations.

Pedestrian permeability and convenience is an important consideration, often neglected.

Q.11 *The Partial RIA (at Part 4) sets out the likely benefits and costs of the*

PPS, assessing two options, (i) the "do nothing" option and (ii) implementation of the PPS. Are these options viable? Would you add to/change the disadvantages/advantages of each? Are there any other options that should be considered?

As indicated above, the absence of any consideration of refurbishment as an alternative to new build development is a fundamental omission (see question 1 above). Inclusion of this option will fundamentally change the potential effectiveness of the PPS and consideration of costs and benefits.

Q.12 *The Partial RIA sets out potential impacts by stakeholder. Would you add to/change the impacts for each group? Are any stakeholders missing from the list?*

Under financial providers, venture capitalists and other providers of development finance need to be included. The nature of development finance is often a barrier to creating mixed use development, with many financiers preferring to specialise in funding a particular kind of development. This needs to change.

END OF FORMAL SUBMISSION.

I trust these comments are helpful.

Yours faithfully

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