

Draft Climate Change SPD

Sent: 22 August 2013 16:43

To: Planning Policy

Dear Planning Policy

You sent me the links to the consultation drafts of the Climate Change Policy and CIL SPDs.

I don't feel qualified to comment on the CIL draft - current policy and ongoing legal cases seem to me to have given local authorities rather limited scope for action. In addition, the economic situation and "viability" concerns - even in a rich area like Woking - tend to restrict the room for manoeuvre.

I would like to make the following comments on the Draft Climate change SPD. Please note that this SPD is also being considered by Woking LA21, but we have not been able to come to an agreed text, not from disagreements, but as it is the holiday period. This is always a problem for summer consultations. So you might receive some comments from them.

As it is, I have deliberately kept off the technical aspects of the SPD as it relates to building codes, as others in LA21 know much more about these matters than I and, again, there are pretty clear national policy directions developing.

My overriding comment is that this SPD must not replace the need for a proper comprehensive Climate Change Strategy. The revision of the strategy is noted in the SPD (page 7) but I have heard that there is some doubt that the revision will go ahead. Is this true?

The SPD is much longer than the original intention for documents of this nature, but I am aware that authorities now seem to have much more freedom to expand. Whether this is helpful to the user is doubtful. It does give a mass of information as well as the prime purpose to enlarge on two policies in the adopted local plan. I don't find this mixture of material helpful, as it makes the SPD very long. Much of the informatory material would be better placed in the Climate Change strategy, cross-referencing national information as necessary.

The SPD only enlarges on two fairly limited planning policies (CS 22 and 23), but makes reference to several others. This makes the document's purpose less clear - and reinforces the case for a comprehensive view of climate change.

On the details of the codes as presented, it is not entirely clear how the planning requirement relates / will relate to the general regulatory requirements (specifically the Building Regulations after the bringing together of regulatory regimes). If the scope of SPDs is to provide assistance within the ambit of the Local plan policies - and I am not aware that this primary purpose of the 2004 Act then three points need to be made:

- 1= planning is often relative, not absolute, and requirements can be dispensed with on a variety of grounds or traded off against others, so how will the high intentions of the SPD be met in practice through the normal activity of development control/management? and
- 2= the government's relaxation of planning controls (through the

extension of permitted development, Local Development Orders etc.) and its overall national policy of securing "sustainable development" means that in real life much development will not be under planning control at all - the larger extensions to residences are an example - so in practice some of the "requirements" set out here may not be realised. I note anyway that page 24 uses the word "encourage" rather than "require".

3= It is not sufficient to relate requirements to new development when the bulk of the ongoing problem, both for climate change concerns in buildings and the issue of high energy costs and fuel poverty, is the poor standard of existing stock. If this cannot be tackled in a "planning" document -because of the limitations of planning control as currently practised - then the better place is a full climate change strategy identifying all the restrictions, inducements and encouragements that can be given to secure the vital improvement of the building stock.

On wind energy (page 39) I gather that wind turbines are being discouraged in Woking, so is this section rather "hot air"? As the whole question of different forms of energy is both contentious (wind farms, fracking and energy from waste) and subject to a large amount of (unnecessary?) political posturing, the proper place for all this is both

a= the climate change strategy and

b= a revision of the Local Plan, where land allocations and connections

with other policies affecting the environment and structure of the Borough can be made.

In principle, I think the definition of the scope for sites in Central Woking to be part of District Energy arrangements is useful, but do not have enough knowledge to be able to comment on the details. I hope the energy source is to be renewable, but from remarks made on pages 44 and 45 I fear that it will actually be carbon-intensive.

From page 62 onwards the SPD departs from its enlargement of the two CS policies and moves into other fields. I am not convinced this is appropriate for this SPD - and again would be better discussed in a wider context, especially the Climate Change Strategy. The issues raised also have far wider implications than the sustainable construction / energy focus of the bulk of the SPD.

I do not agree with the intention of the promotion of Electric Vehicles (EV), although I understand this is a government policy. However, without proper consideration of (i) where the electricity comes from; (ii) the resource implications of essential components - especially batteries -and (iii) the implications for continued congestion and car dominance - I do not believe councils should be requiring charging points. There may be a case for the more limited provision for electric fleet / shared cars as part of an urban restructuring based on car sharing and less provision for individual parking spaces and roads in developments (just think how many extra housing units could be provided!), but this has not been made here.

Similarly, the promotion of green infrastructure (page 70+) cannot be properly achieved if so much of the land surface is taken up by provision for moving and parked vehicles, sterilising the surface. The lower (gross or overall town) density development required to achieve car use - as well as the necessity to use a car to reach out of centre low density sites with acres of parking - implies a greater

spread of non-green development into the countryside to achieve any meaningful housing requirements. This would be better explored in a Climate Change Strategy and the future revision of the Local Plan. In the absence of a proper spatial strategy for the development of the town and its infrastructure (which is not in the Local Plan) statements such as made here are little more than hopes which look good but may never be achieved.

I hope this is helpful.

best wishes
John Hack