



RTPI

mediation of space · making of place

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To whom it may concern,

RESPONSE TO CONSULTATION ON THE 'EACH HOME COUNTS' REVIEW

The RTPI welcomes the opportunity to provide evidence to the DECC/DCLG consultation on the 'Each Home Counts' review.

The RTPI is the largest professional institute for planners in Europe, representing some 24,000 spatial planners. 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.

Please see our submission to the consultation below.

Yours faithfully,

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Thank you for the opportunity to respond on the current consultation on Each Home Counts. This report has been drawn up by Peter Bonfield and trade representatives to address important matters related to failings in the fields of Consumer Advice, Protection Standards and Enforcement of Energy Efficiency and Renewable Energy. Its vision is to put the consumer at the heart of the Review.

The RTPI is the largest professional body for urban planners in Europe with over 24,000 members. We work to promote the value of planning, maintain high standards of practice and train the next generation of planners. We have been playing an important role in these discussions since the launch of the Microgeneration Strategy in 2011. Many of our members have first-hand knowledge from different parts of the UK. Some individual members have previously responded to other consultations about renewable energy undertaken as part of the Home Quality Mark initiative undertaken by the BRE.

Many different forms of renewable energy constitute development under the Town and Country Planning Acts, and our members are involved with these matters. Local Planning Authorities (LPAs) are responsible for microgeneration schemes up to 50kW, and planning permission is required for new development of microgeneration schemes. Permitted development (PD) rights can be used for certain schemes in existing dwellings, although not for listed buildings which require planning permission. In National Parks, PD rights may apply to some existing properties, although some aspects of conservation area legislation and local plan policy may be used to restrict PD rights and require planning permission. LPAs have a duty to formulate planning policy, which are subject to public scrutiny, and have an important planning enforcement role.

While we recognise that this is an industry-led review, we think that the consultation process has missed the opportunity to feed valuable information from planning professionals in to the Working Groups. There are changing trends and challenges being faced by our members and local communities which are in need for attention. A public-facing consultation would also be desirable before decisions about new frameworks are adopted, in order to ensure that a range of voices and opinions are heard.

More background information on the evidence used by the Working Groups would also be desirable. Once new proposals have been adopted, this allows us to monitor how their impacts matches or differ from original expectations.

The Government wants microgeneration to play a bigger role in the future. Our members have insight into examples of good and bad practice related to a range of microgeneration schemes, and it would be worth assessing these to gather evidence relating to the effectiveness of different products and any legal irregularities occurring during the planning/implementation process. This would help to avoid bad practices which might result in the public becoming hostile to microgeneration.

The report identifies a need for more accurate information about microgeneration products. There is indeed room for improvement, including clarity on the distinction between microgeneration in new and existing dwellings in planning terms. This applies to the report itself, which could benefit from making this distinction upfront rather than later in the report.

There is also a need for consistency in the guidance provided by government websites, from which businesses, planning professionals and others often draw from. For example, the

preliminary text about Heat Pumps on the Planning Portal website is not clear about when permitted development does and does not apply. Another example is that the Welsh Government currently lists Heat Pumps as a potential source of noise whereas other government websites do not. Archived web information had identified noise nuisance in the past (reflecting technical reports of the time) but the current omission is not justified by reference to contemporary technical reports (such as Impact Assessments). Evidence submitted by one of our members states that a 25kW Air Source Heat Pump can be audible from over 45 metres away in a quiet residential rural area.

Our members rely on this guidance from government to accurately reflect technical issues when undertaking their work, and need to be confident that the evidence base is up to date.