Allerdale Borough Council Planning Policy Climate Change Checklist

October 2022

Tackling Climate Change – Planning Policy

1.   Introduction

1.1   Addressing climate change is one of the core land use planning principles which underpins both plan-making and decision-taking in the planning system.

1.2   To respond to climate change policies within the Allerdale Local Plan relate to both climate change adaptation and climate change mitigation. Adaptation refers to adjustments made in response to the impacts of climate change and to reduce our vulnerability, mitigation refers to actions designed to reduce the impact of human activity on climate change, primarily through reducing greenhouse gas emissions.

1.3   The purpose of this guidance is to ensure that our existing adopted planning policies are utilised effectively to tackle the climate change crisis. It highlights relevant policies and identifies how their requirements should be applied in assessing proposals for new development.

1.4   The guidance is intended as a useful resource for developers, planning officers and Councillors.

2.   Background

2.1   Through the Climate Change Act 2008 the Government has committed to reduce greenhouse gas emissions by at least 100% of 1990 levels by 2050, and contribute to global emissions reductions aimed at limiting global temperature rise to below 2°C. To meet these targets the government sets five-yearly carbon budgets. The Sixth Carbon Budget sets a target to reduce UK greenhouse gas emissions by 78% by 2035 (compared with 1990 levels).

2.2   As a Council we are committed to doing all that we can to tackle climate change by reducing our CO2 emissions and taking a lead in our communities. In September 2019 a motion to reduce carbon emissions both as an organisation and as a Local Planning Authority was agreed. A Climate Change working group was established in March 2020 and a Climate Change Action Plan[1] developed.

3.   National Policy and Guidance

3.1   The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England, providing the framework for local development plans that guide development, and as a material consideration in the determination of planning applications. The NPPF 2021 sets out that the purpose of the planning system is to contribute to sustainable development[2].

[1] https://www.allerdale.gov.uk/en/your-environment/climate-change/climate-change-action-plan/
[2] NPPF (2021) Paragraph 7 National Planning Policy Framework - 2. Achieving sustainable development - Guidance - GOV.UK (www.gov.uk)

3.2   Paragraph 8 requires opportunities to be taken to secure net gains across all three overarching objectives of the planning system that contribute to the achievement of sustainable development: economic, social, and environmental. The environmental objective is to protect and enhance the natural, built, and historic environment, which includes mitigating and adapting to climate change and moving to a low carbon economy.

3.3   Chapter 14[3] of the NPPF (2021) relates specifically to meeting the challenge of climate change, flooding and coastal change. Paragraph 152 states:

The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

3.4   Section 12 of the revised NPPF places greater emphasis on the design quality of new development. Local Planning Authorities are expected to prepare design guides or codes consistent with the principles and guidance set out in the National Design Guide [4](NDG) and National Model Design Code[5] (NMDC). These documents are to be used to guide decisions on applications in the absence of locally produced design guides or design codes. Climate change mitigation and adaptation measures are incorporated as integral components of good design.

3.5   National Planning Practice Guidance (NPPG) provides supplementary guidance to assist the implementation of the NPPF. The Climate Change Section[6] advises how to identify suitable mitigation and adaptation measures in the planning process to address the impacts of climate change.

4.   Local Plan Policies

4.1   The development plan for Allerdale consists of the Allerdale Local Plan (Part 1) (ALPP1) adopted in July 2014, and the Allerdale Local Plan (Part 2) (ALPP2) adopted in July 2020. Both contain policies relevant to Climate Change.

4.2   The following table sets out existing local plan policies that relate to the mitigation of and adaption to climate change.

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[3] NPPF (2021) Section 14 Paragraphs 152 – 173 National Planning Policy Framework - 14. Meeting the challenge of climate change, flooding and coastal change - Guidance - GOV.UK (www.gov.uk)
[4] https://www.gov.uk/government/publications/national-design-guide
[5] https://www.gov.uk/government/publications/national-model-design-code
[6] https://www.gov.uk/guidance/climate-change

Table 1. Allerdale Local Plan Policies relevant to Climate Change

Policy reference	Summary of policy	Contribution to climate change mitigation and adaptation
ALPP1		
Strategic Objectives **SO1a - SO1g Climate Change and Sustainability** **SO4a, SO4c Transport** **SO5a, SO5d, SO5e Built Environment** **SO6b, SO6d, SO6e Natural Environment**	Promotes reducing Allerdale's carbon footprint and supports a low carbon future, locating development close to services, alternative means of transport (other than car), and supports energy efficiency, renewable energy and effective use of land and buildings. Promotion of Green Infrastructure, protection of biodiversity and ensuring a resilient liveable environment.	Aim is to reduce the need to travel by car, where travel is necessary there are alternatives such as public transport, walking and cycling. Energy sources are from low or zero carbon. Natural resources such as land are effectively and efficiently used. Development is safe and energy efficient, whilst green infrastructure is protected, promoted, and provided.
Policy S2 Sustainable Development Principles	Overarching strategic policy for sustainable development, setting out high level economic, social and environmental principles that contribute to the achievement of sustainable development. Seeks to reduce Allerdale's carbon footprint and ensure the impact of development on climate change is mitigated and that a comfortable, resilient and liveable environment is achieved by adapting to its effects. Aims to minimise impact on natural	Policy sets out high level principles to ensure development can mitigate and withstand and adapt to climate changes. For example flooding, drainage systems that can cope and reduce impacts of surface water run-off. Design of development which includes green infrastructure, orientation of buildings, energy efficiency, shading (tree planting), renewable energy sources.

	resources through waste reduction, recycling, renewable and low carbon energy, encourage sustainable construction to improve energy efficiency, provide renewable energy, reduce water consumption and waste and use sustainably sourced materials, minimise flood risk and do not undermine flood defences or alleviation methods, habitat and species protection, green infrastructure and ecological networks sustainable drainage, support local food production. Minimise travel. Effective and efficient use of land, encouraging the reuse of previously-developed land.	Use of locally sourced materials to reduce the transporting of resources over long distances. Similarly local food production.
Policy S3 Spatial Strategy	Development strategy for the district that concentrates growth in existing centres to take advantage of access to services, public transport and employment	This strategy seeks to reduce the need to travel to access jobs, housing and services by concentrating the majority of development in the main towns, where there is also the availability of alternative means of transport.
Policies S4 Design Principles	Sets out the overarching framework for design in all development. This includes incorporating sustainable construction methods that reduce energy consumption, and improving connections between people and places through the provision	

	of well thought-out layouts, public realm, landscaping, streetscape and public and private greenspaces. References buildings for life 12 and Manual for streets	
Policy S19 Renewable Energy and Low Carbon Technologies	Policy supporting renewable energy and low carbon technologies from all potential sources.	
Policy S22 Transport Principles	Underpins the spatial strategy by requiring development to be located in areas which help to reduce journey times and have safe and convenient access to public transport, improve travel choice and reduce need to travel by private vehicle. Sustainable travel is promoted. Seeks to prioritise pedestrians and cyclists in development and links to public transport hubs. Charging points for electric and hybrid vehicles	This policy requires sites to be connected or create connections and networks for pedestrian and cyclists as part of the development. Travel Plans to support schemes to encourage a shift away from the car to public transport. Location of development that can benefit from existing public transport services.
Policy S24 Green Infrastructure	Promotes the creation, enhancement, maintenance and protection of a range of GI assets and ensure that GI is woven into development. Multi-functional habitat networks, green buildings, sustainable drainage and flood mitigation solutions, woodland management	The benefits of green infrastructure are managing flood events and drainage of surface water. It provides for habitat and species resilience as well as providing possible walking and cycling routes, thus encouraging these activities.

Policy S29 Flood Risk and Surface Water Drainage	Aims to ensure that development is not located in high flood risk areas, that schemes include sustainable drainage systems and where flood risk an issue appropriate mitigation is achieved.	This policy aims to minimise the number of properties that could be at risk from flooding by avoiding known flood areas, and install drainage systems that can adapt to changing rainfall. The supporting evidence (flood modelling) builds in climate change forecasts to try to future-proof decision making.
Policy S30 Reuse of Land	Supports the use of brownfield sites	Supporting the reuse of sites in towns so that land can be used as efficiently as possible.
Policy S31 Reuse of rural buildings and replacement dwellings in the countryside.	Supports the reuse of rural buildings	Supports the recycling of building for alternative uses.
Policy S35 Protecting and Enhancing Biodiversity and Geodiversity	A key priority of the local plan is to promote sustainable development whilst conserving and enhancing biodiversity and geodiversity. This policy ensures biodiversity is protected and enhanced as part of any development. This is also reinforced in the design and green infrastructure policies.	To build robust and climate resilient species and habitats. The Environment Act introduces a mandatory requirement for developments to demonstrate a measurable 10% increase in biodiversity from 2023, but planning policies already support and promote the protection and enhancement of biodiversity and the achievements of net gains for biodiversity.

Policy S36 Air, Water and Soil Quality	Ensures that development does not have adverse impacts on air, soil and water quality. Safeguarding of high-quality agricultural land.	Protection of high-grade agricultural land does provide the opportunity to secure a local food supply chain.
Policy S37 Shoreline Management and Coastal Development	Limits coastal development to proposals that require a coastal location and also supports the relocations of businesses and homes in land where coastal erosion is an issue.	This takes account of the changing coastline from rising sea levels and erosion and also tidal flood risk. This policy limits new development to reduce potential impacts from coastal erosion but it also supports relocation of existing property if it is affected by coastal change.
Policy DM12 Sustainable Construction	Sets out the Council's expectations for new development in terms of sustainability and responding to climate change. Includes minimising surface water runoff through sustainable drainage and green infrastructure, implementing water and energy efficiency measures, use of renewable energy, orientation of buildings, locally sourced and recycled materials, waste management including recycling and composting facilities, and minimising impact on biodiversity. The supporting text signposts the BREEAM (Building Research Establishment Environmental Assessment Method) 'very good' standard	This policy is outlining in greater detail what is expected in the design of schemes. Government currently consulting on proposed changes to Building Regulations to improve energy efficiency measures and low carbon energy sources such as ground source heating.

	for building design, construction & operation, and the Code for Sustainable Homes Level 4, the latter is no longer supported	
Policy DM14 Standards of Good Design	Supports policy S4 providing details on what is required to ensure an appropriate standard of design is achieved and maintained. Reference is made to appropriate facilities for pedestrians and cyclists, and green infrastructure and the retention of existing assets such as trees and hedgerows. The policy also sets out expectations for landscaping in new development, offering opportunities for biodiversity enhancement. The supporting text signposts good practice such as Building for Life 12 and Manual for Streets	
Policy DM17 Trees, Hedgerows and Woodlands	Seeks to safeguard existing trees and hedgerows and where that is not possible ensure appropriate mitigation and replacement.	Benefits biodiversity and delivers climate change mitigation by reducing surface water run-off rates and providing shade in hot weather.

ALPP2		
Site Allocations SA8-SA29, SA36-45 and SA46-49		Each site allocation policy incorporates requirements relating to flood risk, sustainable drainage, enhancement to biodiversity and green infrastructure. Site selection included factor such as distance from bus stops and local services to try and encourage walking, cycling and use of public transport.
Policy SA52 Protecting and Creating Green Infrastructure	In support of Policy S24 and design policies that highlight the role of green infrastructure, this policy sets out further expectations regarding the provision of green infrastructure and identifies a green infrastructure network in the main towns.	The benefits of green infrastructure are managing flood events and sustainable drainage of surface water, particularly in storm events, and providing shading in hot weather. It provides for habitat and species resilience as well as promoting walking and cycling.

5. Climate Change Checklist

5.1 Table 1 highlights the existing local plan polices relevant to climate change mitigation and adaptation.

5.2 It is not always apparent how a development proposal has been designed with these policies in mind, and how the development will mitigate and adapt to climate change.

5.3 A climate change checklist has therefore been prepared to help in the assessment of new homes, commercial development, and infrastructure projects, to ensure that developers are doing all they can to respond to climate change.

5.4 Table 2 below sets out the checklist which consists of a series of questions relating to the themes within the policies outlined in table 1.

5.2 Whilst the checklist does not form part of the formal validation checklist, the Council will use these questions to consider and assess proposals, ensuring that climate change is properly taken into account as a material planning consideration. Applicants are encouraged to complete the checklist to demonstrate how they are addressing climate change and complying with existing relevant policies. It will also be used in pre-application discussions.

Table 2. Checklist

Question	Relevant Policies
1. Is the development located and designed in a way that it will enable people to choose sustainable transport modes (walking, cycling, public transport)? Does the layout and design promote appropriate connectivity to encourage and facilitate walking and cycling?	S2, S3, S4, S22, DM14
2. Will the development incorporate facilities for charging plug-in and other ultra-low emission vehicles as required by building regulations? How will this be accommodated within the design of development?	S2, S22
3. Does the development prioritise the re-use of land and buildings, and use sustainable building materials (taking account of their full lifecycle) and construction methods? Have locally and responsibly sourced materials been considered? Are recycled and recyclable products employed For example. re-using demolition materials for hardcore and aggregate.	S2, S4, S30, S31, DM12
4. Does the development identify opportunities to increase the proportion of energy derived from renewable sources, including opportunities for	S2, S19, DM12,

	on-site renewable and low carbon technolo-gies?	
5.	Does the development carefully consider how biodiversity net gain will be achieved and does it incorporate green/blue infrastructure which will help mitigate and respond to climate change? For example. tree planting to absorb carbon and provide shade from overheating, wetland SuDS features to manage flood risk, green routes for active travel etc). Will existing trees and hedgerows and ecological features be retained, and blue and green spaces linked to the wider green infrastructure assets of the borough? Does the scheme provide for on-go-ing management of green and blue spaces and/or biodiversity habitats?	S2, S4, S24, S35, DM12, DM14, DM17, SA52
6.	Has the development proposal identified how the development might be at risk from local cli-mate change impacts such as flooding, in-creased precipitation and storm events, over-heating and drought, and explained how it has been designed in a way to adapt to climate change, increase resilience and protect people from its impacts? For example, are Sustainable urban drainage systems (SUDS) or other measures designed to reduce surface water runoff from roofing and external surfaces included. Who has any maintenance responsibilities and what other benefits could be achieved such as biodiver-sity & amenity? Are areas of impermeable pav-ing minimised. What measures prevent excess solar gain in summer. Street trees and land-scaping can provide shade and reduce heat is-land effects. Does the development include water efficient fittings and appliances, rainwa-ter harvesting systems or recycling and har-vesting facilities for grey water?	S2, S24, S29, DM12, DM14, SA52
7.	Does the development promote sustainable waste management, through applying the waste hierarchy, providing sufficient space in appropriate locations for recycling and com-posting, and considering a zero waste to land-fill approach?	S2, DM12

8. Does the development's design and layout promote energy conservation and efficiency? For example, through the orientation of properties to maximise passive solar gain, measures to capture solar energy, incorporation of micro-renewables, the provision of passive ventilation for cooling and through appropriate construction materials and methods?	S2, S4, DM12

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