

# Climate Change

## Interim Planning Statement

### April 2022

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South Lakeland  
**CLIMATE  
ACTION**

## Introduction

1. Responding to the climate crisis is at the heart of our [Local Plan Review](#) process, and we will be seeking to strengthen our local planning policies relating to climate change mitigation and adaptation. It will however be some time before the Council's Local Plan Review is complete and can start attracting weight in the decision making process.
2. In the meantime, the main purpose of this interim statement is to ensure that we are applying our existing adopted planning policies to the best effect in tackling the climate emergency.
3. This statement is not in itself planning policy and is not part of the statutory development plan (the Local Plan). Instead, it is an explanatory document, underlining that the climate emergency is a material consideration in planning decisions, and identifying how the requirements of existing development plan policy should be applied in assessing development proposals.
4. It is not possible for this statement to set new policy or create new demands on development. New policy will be set through the Local Plan Review process which is subject to statutory processes, consultation and examination.
5. This statement is intended to be a useful resource for planning officers, Members of the Planning Committee and planning applicants alike.
6. The response to the climate emergency is continually evolving, and this statement will be reviewed frequently to take account of emerging Government policy and legislation on climate change and biodiversity.



## Background

7. The Government has set a legally binding target of reducing the UK's greenhouse gas emissions by 100% (net zero) from 1990 levels by 2050<sup>1</sup>. The UK's Sixth Carbon Budget recommends a target of a 78% reduction by 2035 in order to reach our net zero target.
8. Locally, South Lakeland District Council (SLDC) has set ambitious targets for the Council as an organisation to become carbon neutral by 2030 and as a district by 2037. New development must clearly play its part in reducing carbon emissions to contribute to meeting these targets.
9. The Council declared a climate emergency in February 2019, and we have a corporate [Climate Action Plan](#) setting out how we will meet our carbon neutral ambitions.

## National Policy and Guidance

10. The revised National Planning Policy Framework (NPPF) states in paragraph 7 that **the purpose of the planning system is to contribute to sustainable development.**
11. 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.”*
12. The online planning practice guidance has numerous sections relating to planning for climate change: [climate change](#), [flood risk and coastal change](#), [natural environment](#), [renewable and low carbon energy](#), [Travel Plans](#), [Transport Assessments and Statements](#).
13. The [National Design Guide](#) provides guidance on how good design should contribute to climate change mitigation and adaptation.

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<sup>1</sup> Climate Change Act 2008

## Current Local Plan policies relating to climate change mitigation and adaptation

14. This section of the interim statement lists all the policies in our existing Local Plan that relate to the **mitigation** (reducing climate change through reducing greenhouse gas emissions) of and **adaptation** (adjusting to the impacts and reducing our vulnerability) to climate change. The key policy that sets out our strategic policy in relation to climate change is **Core Strategy Policy CS1.1** which states:

*“Opportunities **must** be taken to mitigate against and adapt to climate change including addressing flood risk, improving waste management, improving air quality, strengthening ecosystem services to enhance resilience of the natural environment, minimizing the use of non-renewable resources and increasing the proportion of energy derived from renewables or other more sustainable options”*

Policy	Policy Requirements for New Development
<b>CS1.1 – Sustainable Development Principles</b>	<ul style="list-style-type: none"> <li>- Sets out the overarching strategic policy for sustainable development in South Lakeland, and embeds climate change mitigation and adaptation as a key underpinning principle.</li> </ul>
<b>CS1.2 – Development Strategy</b>	<ul style="list-style-type: none"> <li>- Directs the majority of development to the most sustainable locations and therefore helps reduce the need to travel and resultant emissions.</li> <li>- Prevents isolated development in unsustainable locations unless exceptional circumstances apply.</li> <li>- Prioritises the reuse of land for housing development.</li> </ul>
<b>CS6.6 – Effective and Efficient use of land and buildings</b>	<ul style="list-style-type: none"> <li>- Sets a target for 28% of housing development to take place on previously developed land.</li> <li>- Setting a target of an average density of at least 30 dwellings per hectare for all housing developments, with higher densities sought on appropriate sites close to transport hubs and in and adjoining town centres.</li> </ul>
<b>CS7.7 – Opportunities provided by energy and low carbon economy</b>	<ul style="list-style-type: none"> <li>- General support in principle for renewable and low carbon energy development.</li> </ul>
<b>CS8.1 – Green Infrastructure</b>	<ul style="list-style-type: none"> <li>- Seeks to ensure that Green Infrastructure is an integral part of new developments.</li> <li>- Conservation of existing trees and woodlands.</li> </ul>
<b>CS8.7 – Sustainable construction,</b>	<ul style="list-style-type: none"> <li>- Requirement for commercial buildings to meet BREEAM ‘excellent’ from 2013.</li> </ul>

<b>Policy</b>	<b>Policy Requirements for New Development</b>
<b>energy efficiency and renewable energy</b>	<ul style="list-style-type: none"> <li>- Requirement to meet Code for Sustainable Homes in line with Building Regulations (this element now superseded, and energy efficiency standards are therefore set solely by Building Regulations at present)</li> <li>- Encouragement for on-site renewable and low carbon energy sources where possible.</li> <li>- Requirement for Design and Access statements to contain a sustainability statement.</li> </ul>
<b>CS8.8 – Development and Flood Risk</b>	<ul style="list-style-type: none"> <li>- Sets out strategic flood risk policy, embedding principles of sequential and exception tests and sustainable surface water management.</li> </ul>
<b>DM2 – Achieving Sustainable High Quality Design</b>	<ul style="list-style-type: none"> <li>- Requires new development to incorporate measures to support and enhance habitat creation and urban greening in a way that mitigates climate change and responds to its impacts. Suggested measures are set out in footnote 8, and Appendix 1 of the DPD.</li> <li>- Requires development to promote active travel through its design and layout.</li> </ul>
<b>DM3 – Historic Environment</b>	<ul style="list-style-type: none"> <li>- Requires development proposals to preserve and retain historic features (i.e. repair over replacement)</li> </ul>
<b>DM4 – Green and Blue Infrastructure, Open Space, Trees and Landscaping</b>	<ul style="list-style-type: none"> <li>- Requires all developments to result in net gains for biodiversity and green and blue infrastructure and demonstrate how the GI will deliver wider requirements and objectives.</li> </ul>
<b>DM5 – Rights of way and other routes providing pedestrian, cycle and equestrian access</b>	<ul style="list-style-type: none"> <li>- Requires development to safeguard rights of way, and contribute to new pedestrian and cycle routes and green corridors to promote active travel.</li> </ul>
<b>Policy DM6 – Flood Risk Management and Sustainable Drainage Systems (SuDs)</b>	<ul style="list-style-type: none"> <li>- Sets out detailed flood risk and drainage policy.</li> <li>- Requires inappropriate development to be located outwith flood risk areas.</li> <li>- Requires that climate change impacts are taken into account when considering future flood risk to development.</li> <li>- Establishes surface water drainage hierarchy and adherence to Cumbria Development Design Guide. SuDS designs must include allowances for urban creep and climate change.</li> </ul>
<b>DM9 – Parking provision, new and loss of car parks</b>	<ul style="list-style-type: none"> <li>- Sets out a number of factors to be considered in determining appropriate parking provision in new</li> </ul>

Policy	Policy Requirements for New Development
	development, including encouragement of the use of low emission vehicles.
<b>DM21 – Renewable and low carbon technology</b>	- A criteria-based policy for determining proposals for renewable energy development.

## Climate Emergency Checklist

15. The above section highlights the range of policies in the existing Local Plan that require development proposals to mitigate and adapt to climate change.
16. Policy CS8.7 of the Core Strategy already includes a requirement for development proposals to be accompanied by a ‘sustainability statement’ to be included within the Design and Access Statement. The purpose of the sustainability statement is to include information setting out how the proposed development will contribute to key planning objectives around sustainable development. This requirement is not explicit in the Council’s local validation guidance and in practice has not always been required.
17. It is therefore not always apparent to those assessing proposals, or to local communities, just how a development proposal has been designed with sustainable development principles in mind, and how the development will mitigate and adapt to climate change.
18. It is therefore proposed that the validation checklist is updated to include a **climate emergency checklist**. This will be based on the principle of the sustainability statement required by Policy CS8.7 but it is proposed that rather than being contained within the Design and Access Statement, it should be a separate standalone checklist.

## Proposed Checklist

19. It is proposed that the checklist below will be incorporated into the Council’s validation requirements during its forthcoming update. It is proposed that the checklist will be required for the following types of developments:
  - New dwelling houses (including replacement dwellings)
  - New non-residential floorspace
  - New mixed use developments
  - New infrastructure developments
20. In the interim period before the checklist is included in the local validation requirements, planning officers will use the checklist as a prompt in assessing

development proposals, to ensure that they are considering the climate emergency as a material consideration in assessing proposals. Applicants will be encouraged to use the checklist in advance of its formal introduction, through pre-application discussions.

21. It should be noted that the checklist is not introducing any new requirements, but is asking applicants to demonstrate how they are complying with current policy requirements relating to climate change mitigation and adaptation. The relevant policies for each question in the checklist have been identified, to highlight existing policy requirements in relation to each aspect of the 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)?	CS1.1, DM5
2. 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?	CS1.1, CS6.6, DM2
3. Does the development identify opportunities to increase the proportion of energy derived from renewable sources, including opportunities for on-site renewable and low carbon technologies?	CS1.1, DM2, CS7.7, DM25
4. Does the development carefully consider how it will achieve biodiversity net gains and incorporate green/blue infrastructure to mitigate and respond to climate change? (e.g. tree planting to absorb carbon and provide shade from overheating, wetland SuDS features to manage flood risk, green routes for active travel etc)	CS8.1, DM2 DM4, DM6
5. Has the development proposal identified how the development might be at risk from local climate change impacts (e.g. flooding, overheating) and explained how it has been designed in a way to adapt to climate change, increase resilience and protect people from its impacts?	CS1.1, DM2, DM6, CS8.8
6. Does the development promote sustainable waste management, through applying the waste hierarchy, providing sufficient space for recycling facilities and considering a zero waste to landfill approach?	DM2
7. Does the development's design and layout promote energy conservation? (e.g. through the orientation of properties and construction materials and methods?)	DM2
8. Does the development include the specific measures listed in Appendix 1 of the Development Management Policies DPD to help respond to the climate emergency? <sup>2</sup>	DM2 and Appendix 1

<sup>2</sup> These are reproduced in the appendix of this interim statement for ease of reference.

## Looking ahead to the Local Plan Review

22. We're currently reviewing the Local Plan, and this provides an important opportunity to ensure that our policies relating to climate change are up to date and will deliver on our net zero targets. Our review will be comprehensive and cover all issues including our overall development strategy as well as more specific policies relating to climate change. In our [recent Issues and Options consultation](#) we sought views on the following specific policy areas relating to climate change in 'Theme 1' of the consultation document:
- Whether to introduce higher local standards in relation to reducing carbon emissions from new buildings, or whether to just rely on the government's proposed Future Homes Standard and increases to Building Regulations.
  - Whether to strengthen existing policies around sustainable design and construction (i.e. require rather than encourage) and whether to produce extra guidance for developers on this topic e.g. an SPD.
  - Whether to map suitable areas for renewable energy (e.g. solar, wind) to provide a more proactive and positive local policy approach, Also to ensure that appropriate smaller scale onshore wind energy proposals do not continue to be prevented by national policy.
  - Whether to introduce a new policy to encourage our landscapes to be used to help manage and adapt to climate change (for example identifying land for flood risk management purposes or habitat improvements).
  - Intention to update flood risk evidence to help increase understanding of future flood risk taking into account climate change impacts<sup>3</sup>.
23. Over the coming months we will be reviewing feedback from the consultation, undertaking further engagement with stakeholders and commissioning further evidence to support climate change policy development. We will consult on draft policies as part of our draft Local Plan consultation in early 2023.

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<sup>3</sup> An updated Strategic Flood Risk Assessment (SFRA) has been commissioned but is currently on hold as we await finalised updated flood model outlines from the Environment Agency which will include climate change allowances.

## Further Information

24. [The Climate Crisis – A Guide for Local Authorities on Planning for Climate Change](#) (3<sup>rd</sup> edition published October 2021). In particular see Section 4: Development Management.
25. [TCPA Climate Change Webinars and Videos](#)



## Appendix 1

### Development Management Policies DPD: Appendix 1 – List of measures that support and enhance habitat creation, urban greening and respond to the effects of climate change

This is a list of measures that support and enhance habitat creation, urban greening and respond to the effects of climate change. It is not intended to be comprehensive, but gives an indication of some such measures. Under the provisions of Policy DM2 principle 9, the Council will consider such measures and require these to be incorporated within new developments depending on local circumstances and the nature of the proposal.

1. Permeable surfaces, and other features that reduce flood risk.
2. Biodiversity features such as bat boxes, swift bricks and hedgehog highways and other features that create or enhance locally relevant biodiversity habitats ensuring that provision reflects local biodiversity evidence base.
3. Sufficient and well-designed visually unobtrusive space for bin collection/recycling and adequate cycle storage either within the curtilage of a dwelling or building or through formal parking provision where communal buildings are provided.
4. Orientating buildings where they can optimise energy efficiency, solar gain and maximise daylight levels.
5. Maximum and practical use of sustainable and reused and recycled locally sourced building materials.
6. Water saving devices such as water butts.
7. Features that contribute to a greener, healthier environment and improve air quality including living/green walls and roofs and roof gardens and electric vehicle charging points both within on-site and off-site parking.