



Awards for Planning Excellence Case Study

Climate Positive Planning Guidance Entered by Somerset West and Taunton Council

Entry submitted in Feb/March 2022.
Contents of this case study checked June 2022

South West Awards are sponsored by

STRIDE TREGLOWN



1. Project Background

Climate Positive Planning (CPP) and the CNCR recognise the economic opportunities that effective response to the Climate Emergency can provide. CPP recognises multiple pressures on the planning system, and difficulties in ensuring greater environmental sustainability receives the same attention as economic and social sustainability arguments. Climate change mitigation and adaptation should not be seen as an obstacle to achieving these other aims. CPP demonstrates how existing local plans address climate change in their heart - in visions, objectives and policies and how these potential economic opportunities align. It highlights how economic opportunity is central to the Government's Net Zero strategy and how aligning it with tackling the Climate Emergency is integral to national policy including levelling up.

CPP does not impose new viability burdens on development. It recognises that unless more aspirational building standards are delivered, owners of new buildings will face significant avoidable retrofit costs. Higher building standards also provide local economic benefits. It references delivering net zero homes at a premium of only 2-6% over building to Part L 2021 and recognises the need to change building design processes, typologies, skills and supply chains. Although technology, knowledge and ability to deliver net zero exists, it is not sufficiently widespread or mature across the development industry.

Low-income households are particularly vulnerable to climate change impacts. Reference is made to energy and cost of living crises. Improved building standards help avoid increased energy bills, reducing fuel poverty and inequality. CPP focuses on raising the profile of environmental sustainability but recognises the role of planning to deliver sustainable development in the round.

Climate change fundamentally threatens human health and wellbeing. Addressing health and wellbeing outcomes is central to good planning and design. CPP highlights how climate action, health, wellbeing and other objectives are central to adopted plan visions, objectives and policies. Improved fabric standards can ensure more comfortable, healthy and lower carbon buildings. Site location, linkages and public realm design can ensure improved accessibility for all, leading to lower transport emissions, improved activity levels, and safer, more accessible streets.

Research shows more vulnerable and less empowered social groups (including women and girls) are more likely to be adversely affected by climate change and by not moving quickly enough to mitigate. CPP references policy and guidance such as Local Transport Note 1/20, Manual for Streets and Building for a Healthy Life; which collectively can ensure that places and active travel connections are safe, attractive and accessible for all. Encouraging higher building standards reduces the potential for more vulnerable populations to be driven into fuel poverty.

Rural isolation and deprivation associated with barriers to housing and services is locally widespread. 52% of the district's gross territorial CO2 emissions arise from transport, making socially sustainable emissions reduction more difficult. CPP reiterates adopted policies for development in sustainable locations, improved digital infrastructure, EV charging, active and public transport solutions. Flooding and coastal change are significant local issues which climate change risks exacerbating, with more vulnerable and deprived communities often disproportionately affected. (Equalities Impact Assessment attached)

1. Planning Contribution

Chartered planners were central to this work; providing leadership, vision, coordination, continuity and consistency across SWT's response to the Climate Emergency declaration how this relates in practice to and can be delivered through planning.

A Chartered Planner from the Planning Policy and Implementation Team led and coordinated the production of CPP, SWT's Net Zero Carbon Toolkit, the CNCR Action Plan and officer input into the Somerset Climate Emergency Strategy. The Assistant Director that oversaw these documents was also a Chartered Planner, fulfilling a Chief Planner role within the Council. These two planners also oversaw

and inputted into SWT's Design Guide SPDs. This ensured continuity and consistency in approach, with the same leadership and vision informing all documents. This also secured an effective holistic approach and cross-referencing between documents with each supportive and complementary to one another. The lead role taken by planners on the development of the Climate Emergency work was key. This ensured a holistic approach was considered throughout, integrating planning into the outcomes and actions, which in turn enabled a stronger and quicker planning focussed response via the production of CPP.

The Somerset Climate Emergency Strategy was built on collaboration between officers, members and external parties to identify and discuss key issues and find solutions. Discussion at sector workshops informed the high level outcomes and action plan within this Strategy, and the local actions set out within the CNCR Action Plan (including production of an interim policy statement). CPP was heavily influenced by stakeholder engagement undertaken as part of this Strategy and was informed by responses to the draft consultation.

Training was delivered on CPP to Development Management colleagues and Planning Committee members in March 2021. This disseminated the contents, improved understanding and confidence over its role in future decision making. It helped officer and member awareness of how far adopted planning policy allowed them to push and the tools at their disposal, whilst recognising the wider scope of planning and its role in delivering sustainable development in the round.

CPP Version 2 makes important links to the Net Zero Carbon Toolkit, which has been adapted from the Toolkit published by Cotswold, West Oxfordshire and Forest of Dean Councils. It also links heavily to the Districtwide Design Guide SPD which includes aspirational key performance indicators for building standards linked to the LETI Climate Emergency Design Guide. Linking to these documents helps officers and members to understand and articulate what they want to see, as well as assess the degree of climate response in development proposals in comparison to claims, policy and Council ambition. SWT's Quality Review Panel will be briefed shortly on CPP with additional training for planning officers and members also planned.

Initial conversations have begun across Somerset authorities to produce similar statements and consistently align guidance ahead of local plan work beginning for the new unitary authority. Other authorities are also taking note of the approach in CPP and are inspired to develop their own similar documents (e.g. Mid Devon District Council).

2. Outcomes for climate action

52% of the district's gross territorial CO2 emissions arise from transport, with a further 26% from domestic sources. New development is only directly relevant to a relatively small proportion these. However, it can provide the catalyst for change in relation to modal shift, EVs, renewable energy, Sustainable Urban Drainage Systems and ensuring new builds do not add to the more significant issue of retrofit, as well as ensuring resilience to future climate impacts. CPP seeks to maximise the effect of adopted planning policies in this regard through guidance on their applicability and influence of the Climate Emergency Declaration in determining planning applications. It articulates SWT's expectations of development and how planning applications are to be evidenced and assessed over the interim period pending the adoption of next generation Local Plan(s) within the context of national and local policy and guidance. The Climate Emergency Checklist requires applicants to submit responses to eight questions relating to:

Reducing the need to travel
Sustainable travel

Energy efficient design
Site-specific opportunities
Circular economy principles and embodied carbon
Fostering sustainable habits
Multi-functional Green Infrastructure and resilience
Protecting and enhancing ecology

The questions are expected to provoke appropriate consideration by applicants about how their application could provide a positive answer. Responses should be specific, not generic, supplemented with explanation and evidence of how the proposal will or will not meet the suggestions.

The principal purpose of CPP is to ensure that SWT is applying adopted planning policies to the best of their effect in tackling the Climate Emergency, setting out how planning can have a meaningful influence on meeting the overarching target of working towards carbon neutrality by 2030, in the interim period pending future local plan development. The guidance ensures applicants address mitigation and adaptation within submissions, setting a clear benchmark for information, explaining how applications will be assessed. It provides a consistent and easy to understand framework for applicants to set out supporting evidence. CPP, the Checklist, and appropriate training have led to climate considerations being more visible in case officer reports, in application assessment, decision-making, and greater applicant awareness.

Following approval, Local Validation requirements were updated to ensure reference to the Checklist and other necessary evidence. Submitted information helps officers to understand, assess and report on how applications respond to the Climate Emergency and specific policies. There has been a tendency with some applicants to submit generic and weak responses to the Checklist which has led to CPP Version 2 referring to the need for responses to be specific and to refer to plan policies and SPDs.

The Council's response to its Climate Emergency declaration (including CPP) has been independently assessed as being the top performing council Climate Action Plan by Climate Emergency UK with the national press making specific mention of strategic priorities for planning and CPP itself. The inclusion of aspirational building standards in the adopted Districtwide Design Guide SPD and the SWT Net Zero Carbon Toolkit has further articulated how developments can and should aspire to go further where possible.

3. Outcomes for sustainable development

CPP recognises that contributing to the achievement of sustainable development (comprised of economic, social and environmental objectives) is the core purpose of the planning system. It references the UN Sustainable Development Goals in this regard. CPP recognises the multiple pressures on the planning system but explains that mitigation and adaptation to climate change should not be seen as an obstacle to the achievement of these other aims. It states that the Climate Emergency declaration pushes environmental sustainability back up the priority list, to be considered alongside issues of economic and social sustainability.

CPP particularly responds to the following Sustainable Development Goals:

11 (Sustainable Cities and Communities) - it is focused on aligning planning and sustainability/climate action. It reiterates the importance of location for the achievement of sustainable and low carbon development. It clarifies how improvements to active travel infrastructure, public and shared transport schemes and EV charge points will be secured in line with adopted policies. Together with the Districtwide Design Guide SPD it clarifies how sustainable buildings and places are central to high

quality design. It clarifies how multi-functional and holistically thought through green infrastructure is central to adopted policies.

13 (Climate Action) - it demonstrates how mitigation of and adaptation to climate change are integral to adopted policies. It effectively links actions and projects within the CNCR Action Plan to local plan policy. It effectively raises awareness about the crucial role planning plays in responding to the Climate Emergency.

15 (Life on Land) - it recognises that whilst separate declarations have been made, the Climate and Ecological Emergencies are interdependent and must be considered in tandem for greatest impact. It explains that through the combination of the clear direction of national policy and duties set out by the Environment Act, adopted planning policy, and the NPPF, there is a strong expectation that new developments should be delivering biodiversity net gain now, in advance of the national requirements becoming mandatory.

3 (Good Health and Well-being) - it makes the links between climate action and health and wellbeing outcomes including in relation to higher building standards, active travel and accessible green infrastructure.

12 (Responsible Consumption and Production) - it promotes adherence to the waste hierarchy, a sustainable transport hierarchy and an energy hierarchy all of which promote sustainable and responsible consumption and production. It refers to utilising circular economy principles and reporting sustainability of materials sourced.

7 (Affordable and Clean Energy) - it recognises the importance of planning in the ability to meet renewable energy targets. It clearly focuses on improving the energy efficiency of new build development as well as encouraging improvements in conversions and extensions. It promotes the move away from fossil fuel to renewable and electrified systems.

6 (Clean Water and Sanitation) - it clarifies the policy requirement for water efficiency measures, and links this to improvements in water quality locally through reduced phosphate emissions. It promotes the use of high quality, multi-functional SUDS which can be used to mitigate water pollution associated with surface run-off.

4. Community Engagement

The concept for producing CPP emerged following consultation and engagement undertaken in respect of the Local Plan Issues & Options, Climate Emergency Strategy and CNCR Action Plan (all January to March 2020). These consultations were significant and used a combination of online surveys and in person events to collectively capture thousands of responses from a wide range of groups. SWT deliberately organised joint engagement events for the Local Plan and Climate Emergency to encourage consideration of planning's role in responding to the Climate Emergency. Events were held jointly, across the district and at different times of day, in order to reach more people and different audiences. Consultation reports for the Climate Emergency Strategy, CNCR and Issues & Options Part 1 and Part 2 show that planning's response to the Climate Emergency, and urgency of response were clear foci of many responses, and this helped to scope and frame CPP.

Planners engaged directly with key interest groups including Taunton Transition Town and Extinction Rebellion in relation to the Climate Emergency Strategy and CNCR Action Plan, with their inputs and responses extensively referring to the topic of planning. This engagement helped identify key priorities and expectations. In response to these consultations and engagements, (bearing in mind the

groundswell of opinion which led to the declaration of a Climate Emergency and the need for urgent action to meet the 2030 target), the Council took the decision to produce CPP as an interim guidance document. CPP not only provides guidance for applicants, officers and members, it also acts as a communication tool showing how SWT is moving as far and as fast as it can on the issue, considering the constraints of the adopted policy position, whilst also setting out why it cannot go as far as some may like without national policy support or producing new development plan policy.

Public consultation on CPP ran November 2020 to January 2021. Numerous consultation methods were employed, though the full range of methods was limited by covid restrictions and a cautiously proportionate approach considering the pandemic and rising rates of cases in the area. This limited consultation to digital methods. By its nature, the document was fairly technical and text heavy, though officers sought to ensure that it was as accessible as possible considering its nature and purpose. The associated Consultation Report provides more information on methods used, responses received, and changes made as a result.

There was general approval for SWT looking to address and respond to the Climate Emergency. A number of comments from the development industry raised issues with the status of the document, the way that it would be used, and concern about the process involved in its production, claiming it was trying to bring forward new policy outside of proper processes. In response, minor amendments were made to clarify that its content was intended as guidance.

5. Leading Practice

The project brief was set by SWT's Climate Emergency Declaration, which resolved:

“To report...proposals for projects for the Council to effectively start addressing the climate emergency, which could include: ...enabling more cycling, walking and use of shared and public transport ...[and] adopting high energy efficiency standards and providing for the effective use of recycling services in new buildings through the planning system”.

There was also significant pressure from Members and the public for SWT's Declaration to start having a tangible impact on planning application assessment and determination. The Local Plan 2040 Issues & Options Consultation (2020) explained how the Climate Emergency would be central to that Plan's development. Consultation responses supported requiring zero carbon developments as soon as possible, citing the Government's national policy proposals, and that technology already exists. Both the Somerset Climate Emergency Strategy and CNCR Action Plan highlight the importance of planning in meeting the carbon neutrality by 2030 target.

Considering these pressures, proximity of the 2030 target, and timescale that new development plan documents take to hold significant decision-making weight, it was determined that an interim position statement was required to clarify existing policy. (Particularly with cancellation of the proposed national Zero Carbon Homes policy). An interim statement would allow SWT to be transparent about how the Climate Emergency would influence planning decisions, clarify the ongoing relevance of existing policies and the influence of evolving local and national context. It could be produced quickly, cheaply and updated regularly alongside work on new plan policies. Local Government Reorganisation has delayed the production of a new Local Plan, and the local and national context has significantly evolved over 21/22. This has proved the value of this approach, with CPP Version 2 published March 2022.

CPP was produced in-house with minimal budget. It pulled in outputs from other projects including Somerset Electric Vehicle Charging Strategy, Districtwide Design Guide SPD, Taunton Garden Town Vision, and Taunton Local Cycling and Walking Infrastructure Plan. With aspirational building standards

included in the Districtwide Design Guide SPD, the value of CPP has increased further, through its ability to be readily updated and to explain the interaction between adopted policy and aspirational standards.

Most UK Councils have declared a Climate Emergency, and most will seek to ensure that their declaration is materially influencing planning decisions, whilst relying on aging planning policies. The interim approach joins the dots between Climate Emergency Declaration, national policy and legislation, and local planning policy and guidance is capable of effectively informing implementation in practice, enabling better and more transparent decision making. This approach has been recognised as an exemplar (national press article above), and easy to roll out. An example of transferable application is Mid Devon's resolution to do likewise. Similarly, the approach to reference existing standards and tools presents a way for Councils to avoid reinvention and encourages commonality in approach. This too can be rolled out nationally.

The project was closely project planned and managed and despite covid restrictions was delivered on time.

Please note that this case study has been taken from their entry form and so RTPI does not take responsibility for accuracy of contents. Readers are encouraged to undertake further research into the project which is likely to have developed since the time that this entry was written.