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## Addressing climate change through planning

While we need to work nationally and internationally to secure progress on climate change, we also need to galvanise local action.

Find out how you can influence your council and help make your area more sustainable for the future.

### Climate change

The first decade of this century has been the warmest decade so far documented. These globally higher temperatures have affected physical and biological systems in many ways, including: shrinkage of glaciers, more frequent, persistent and intense El Niño events, shifting of plant and animal ranges, and declines in some plant and animal populations. The UK Climate Change Act (2008) requires a 34% reduction in CO<sub>2</sub> from 1990 by 2020. Dependent on greater commitment, or EU emissions reductions, it is hoped this will increase to a 42% reduction. Ultimately, though, we are working towards an 80% reduction by 2050, which is required if we are to have a reasonable chance of avoiding dangerous climate change.

To help achieve these targets, action will be required at both local and national level. This document will help you find out how you can respond to planning applications and draft Local Development Plans (LDPs) to help ensure that new developments are created in a way that takes into consideration their climate change impacts.

LDPs are the land use development plans for each Local Planning Authority area in Wales that set the framework for future development in the area – for more information, see our PDFs *How to get involved with Local Development Plans* and *How to get involved with planning applications*.

When commenting on planning applications or Local Development Plans it is important to strengthen your response by quoting relevant parts of national planning policy and guidance. National planning policy in Wales is very much focused on the climate change agenda, and government is keen to ensure that this is carried through to the decisions that Local Planning Authorities make about new development.

National planning policy produced by the Welsh Government takes account of UK energy targets and policy. Planning Policy Wales (PPW) sets out the current land use planning policy for Wales and provides the policy framework for the preparation of LDPs.

PPW is supplemented by 21 topic based Technical Advice Notes (TANs). The TANs cover all topics that are likely to be included in LDPs and of particular note are: TAN 5 Nature Conservation and Planning, TAN 8 Renewable Energy, and TAN 22 Sustainable Buildings.

Local Planning Authorities refer to this national policy and guidance when deciding planning applications and preparing their LDPs. This also means that it is worth looking at the LDP for your area when commenting on planning applications as it may provide you with useful policies to use in your response.

The most immediately relevant national policy that will be helpful to quote when commenting on climate change aspects of planning applications, or LDPs, is the Climate Change Strategy for Wales. The Strategy aims to put the vision of the Assembly Government's Sustainable Development Scheme *One Wales: One Planet* into action and is accompanied by two Delivery Plans on Emission Reduction and Adaptation. All these documents can be found on the Welsh Government website ([www.wales.gov.uk/climatechange](http://www.wales.gov.uk/climatechange)).

The Welsh Government's key target is to cut greenhouse gas emissions by 3% per year from 2011 in areas of devolved competence. Details are provided on specific targets for the transport, residential, business, agriculture and land use, public, and waste sectors. In respect of the built environment, for example, the Climate Change Strategy explains that land use planning has a critical role to play in ensuring that, for the future, we have low carbon developments that are built in sustainable locations and are resilient to climate change.

To ensure implementation of the Climate Change Strategy, the Welsh Government's approach is firstly to reduce energy consumption and improve energy efficiency, and secondly to maximise renewable and low carbon energy generation at both a small and large scale across Wales. Resilience to the effects of climate change must also be taken into account, and this can open up opportunities for wildlife.

- **Reducing the greenhouse gas emissions from new development**

There are two ways of reducing the climate change impacts of built development. One is to reduce the amount of energy such developments use, and the other is to ensure that as much of the energy required by the development will be produced on-site or by local, low carbon energy. Renewable energy is low carbon, as are systems that use energy more effectively such as combined heat and power.

### **Responding to draft Local Development Plans (LDPs)**

Planning Policy Wales (PPW) sets out minimum energy standards for all new, built development, including a minimum of Code 3 of the Code for Sustainable Homes. The Code for Sustainable Homes measures the sustainability of a new home against categories of sustainable design, rating the 'whole home' as a complete package. The code uses a 1–6 star rating system to communicate the overall sustainability performance of a new home.

So when responding to draft LDP consultations, ask that development is built to the highest energy efficiency standard possible. If it is a housing development, suggest that it should reach level 4, or above, of the code.

PPW says that particular attention should be given to opportunities for minimising carbon emissions associated with the heating, cooling and power systems for new developments. This can include utilizing existing or proposed local, low and zero carbon energy supply systems (including district heating systems). This would encourage the development of new opportunities to supply proposed and existing development, and maximising opportunities to co-locate potential heat customers and suppliers.

LDPs can require higher building standards to be complied with (including zero carbon) provided what is proposed is evidence-based and feasible. So when commenting on a development proposal or draft policy, provide evidence-based information to encourage the Local Planning Authority to consider innovative ways of generating energy on site, and co-locating heat users with potential heat suppliers.

The LDP may include policies and proposals (including designating specific sites) for generating renewable energy for export to the grid. Your response will carry more weight if it is set in the context of national policy which, in principle, encourages the development of renewable energy technologies in line with government targets.

The Local Planning Authority may decide to produce detailed policy and guidance through Supplementary Planning Guidance rather than the LDP. This is not subject to such a rigorous 'adoption' process as LDPs, and so you may need to ask your Local Planning Authority if any such Guidance is proposed to make sure you have the opportunity to make an input.

### **Responding to planning applications**

PPW states that 'in mitigating the causes of climate change development proposals should, after reducing energy demand, optimise the use of energy from renewable and low carbon sources'. Applications that reflect the key principles of climate responsive developments and meet or exceed the standards set out in PPW should be encouraged.

So when responding to planning applications for new, built development, ask that development is built to the highest energy efficiency standard possible. If it is a housing development, suggest that it should reach level 4 or above of the code. There are higher expectations for public buildings, and it is important that opportunities relating to site specific issues (perhaps constructing wildlife ponds within the site) are maximised.

As with responses to draft LDPs, when responding to planning applications for renewable energy generation remember that your comments will carry more weight if they acknowledge the national policy context.

- **Planning for climate change adaptation**

Providing better space for wildlife eg, parks, gardens and wildlife corridors (green infrastructure), and creating development that leaves room for biodiversity will give species room to move and adapt to climate change.

Planning Policy Wales (PPW) gives clear support to protecting wildlife from the effects of climate change. It says, in one of its 'key policy objectives' that planning policies and

proposals should 'seek to ensure that development does not produce irreversible harmful effects on the natural environment and support measures that allow the natural heritage to adapt to the effects of climate change'.

The features concerned are those which, because of their linear and continuous structure or their function as 'stepping stones' or 'wildlife corridors', are essential for migration, dispersal or genetic exchange. The development of networks of statutory and non-statutory sites and of the landscape features which provide links from one habitat to another can make an important contribution to the conservation and enhancement of biodiversity and the quality of the local environment, including enabling adaptation to climate change.

All built development requires drainage. Problems of flooding in both urban and rural areas result not only from climate change but also from excessive use of hard surfaces in built-up areas and straightening, channelling and piping of watercourses. Overly engineered methods of water management have cumulatively reduced the ability of the natural drainage system to cope with heavy rainfall.

An alternative management technique known as Sustainable Drainage Systems (known as SuDS) is promoted through LDPs and can be a requirement of individual planning permissions. SuDS involve greater use of vegetated surfaces to retain rainwater runoff on site for longer and so increase biodiversity.

The Environment Agency publication *Sustainable Drainage Systems* (<http://publications.environment-agency.gov.uk/PDF/GEHO0308BNSS-E-E.pdf>) is extremely helpful in understanding the issues and opportunities presented by SuDS. The use of SuDS can therefore result in double 'climate change benefit', by introducing a network of wildlife habitats into urban areas in order to improve flood management.

### **Responding to draft LDPs**

LDPs must reflect national policy as set out in PPW and other national policy and guidance. PPW is clear that measures to increase the resilience of wildlife to climate change should be incorporated into LDPs. However, it is often one thing to understand the principle, and another thing to come up with innovative and realistic proposals. There is a huge opportunity to offer information and ideas to the Local Planning Authority when they are preparing the LDP to allow them to put the principles into practice.

Suggestions could include protection of wildlife corridors from development, enhancement of biodiversity within large development sites, and provision of sustainable urban drainage systems (SuDS). If there is a policy in the LDP that requires developers to make provision for biodiversity in their scheme, it is much easier to ensure that it happens when a planning application is submitted.

All developments should make some provisions for biodiversity. By creating more space for wildlife we can increase its ability to adapt to changes in the environment. Therefore we have to ensure that all new development provides as much room for wildlife as possible.

Encourage your Local Planning Authority to protect and expand the network of local protected sites. Ensure that the Local Planning Authority has also identified some new areas for habitat recreation. This may be wetland, heathland or another priority habitat depending on the area where you live.

### **Responding to planning applications**

When responding to planning applications, look for the following;

- Ensure that all developments are designed to function effectively in future climatic conditions, with low energy inputs.
- Ensure that residential development incorporates the provision of open space that provides opportunities for both recreation and biodiversity.
- Ask whether green roofs have been considered (a green roof is a roof of a building that is partially or completely covered with vegetation and soil, that provides useable habitat for plants and invertebrates).
- Ask for ponds planted with native species as these help with biodiversity and can provide important drainage functions.
- Ask whether sustainable drainage systems have been considered – these have climate change resilience measures at the heart of their function in that they help reduce ‘flash flooding’ during heavy rain, but they also can increase biodiversity.
- Ensure that the development minimises the extent to which it cuts off any existing link between green spaces. Ask for green corridors to be provided between green areas to ensure the development does not completely isolate an area important for biodiversity.
- Ask developers to provide gardens, or at the very least balconies. Even a small area like a balcony can, with the help of potted plants, provide shelter and food for birds and all kinds of other wildlife, such as butterflies and dragonflies.

### **Further information**

A coalition of planners, local authorities, developers and environmental organisations, including the RSPB, has launched a planning and climate change guide.

*Planning for Climate Change Guide: guidance and model policies for local authorities* is primarily for use by local authorities who want to both tackle climate change and reap the benefits that renewable energy and effective adaptation can bring.

The guide is available to download from the Town and Country Planning Association (TCPA) website ([www.tcpa.org.uk](http://www.tcpa.org.uk)).