



The countryside charity
Lancashire, Liverpool City Region
and Greater Manchester

Acres Brook, Sabden Road
Higham, Lancashire, BB12 9BL

Planning Policy Team
Lancaster City Council
Town Hall
Dalton Square
Lancaster
LA1 1PJ

Telephone: 07718070750
jackie.copley@cprelancashire.org.uk
www.cprelancashire.org.uk

Patron
Her Majesty the Queen
President
Emma Bridgewater
Chair
Debra McConnell

By Email: planningpolicy@lancaster.gov.uk

18th November 2020

Dear Maurice Brophy,

I am writing on behalf of CPRE Lancashire, Liverpool City Region and Greater Manchester. It is welcomed that the Council is progressing a Review of the Local Plan 202-2031 following a climate emergency declaration. We watched and enjoyed the informative video. I have submitted comments via SurveyMonkey, but include a copy of our response in Appendix 1.0 to this letter.

I hope that this letter finds you and colleagues safe and well during the global Coronavirus pandemic. Lockdown has presented threats and challenges, for everyone, including for the Campaign to Protect Rural England (CPRE). As we recover from the Covid-19 restrictions, we hope opportunities can be realised so that improvements to the way we plan our rural places can occur in a 'new normal'. We found from a recent survey that our time in a pandemic has really reinforced just how much people want these green spaces to be the best they can be. <https://www.cpre.org.uk/news/we-want-richer-green-spaces/>.

We are CPRE, the countryside charity

We want a thriving, beautiful countryside for everyone, now and in the future. We're working for a countryside that's rich in nature, accessible and that plays a crucial role in responding to the climate emergency. We stand for a countryside that enriches all of our lives, nourishing our wellbeing, and that we in turn nourish, protect and celebrate.

Climate Emergency

The Climate Emergency is the biggest threat facing our countryside, and planet. We need to drastically reduce our greenhouse gas emissions. The countryside can provide positive solutions. CPRE promotes planting more trees and hedgerows, taking better care of our soils and restoring peatlands, which actually suck carbon from the air and store it in the ground. Green Belt is an important planning policy designation that has successfully kept land open, since its introduction in 1955 as a result of our campaigning, and it is where some of our high value natural capital is found, including woodlands, mosslands and river valleys. We urge you to continue to protect our Green Belt from inappropriate development. Key areas of focus should be:

- Energy demand reduction – planning development to reduce our carbon footprint;
- Location of development – ensuring development is walkable/cyclable;
- Landscape sensitivity – understand where certain forms of renewable would be acceptable in landscape terms;
- Reliance on integrate transport solutions – we must stop car dependent developments;
- More biodiversity – needs to be guaranteed through net biodiversity gain;

- More renewables – developments must demonstrate they include roof mounted PVs, and electric car charging points; and,
- Bridging fuel –we should not pursue shale gas as it cannot be safely explored.

We work with groups, such as the Committee on Climate Change, and the Tyndall Centre to better understand the actions required to ensure an effective transition to low carbon land use. Future development must be based on integrated transport and we must transition almost immediately to renewable sources of energy. Good quality housing design and energy efficiency coupled with building regulations fit for the 21st century must be embedded in the house building process. We're calling on Government to speed up the move to renewable energy and to set a target date for phasing fossil fuels out altogether. <https://www.cpre.org.uk/what-we-care-about/climate-change-and-energy/climate-emergency/>

Summary

If you have any rural issues of interest please do be in contact as we have a lot of rural planning experience to offer. You, and members of your team, are welcome to become members or supporters of CPRE, for details see our website www.cprelancashire.org.uk , and do follow us on Twitter @cprelancs.

We look forward to hearing from you in due course.

Yours sincerely

Jackie Copley MRTPI MA BA(Hons) PgCERT
Planning Manager



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Appendix 1.0 Local Plan Review comments

We have completed the online form <http://www.lancaster.gov.uk/planning/planning-policy/local-plan-review>.

Q1. What changes would you like to see made to the Local Plan from a climate change perspective?

An overall target to understand how the Council plans future development and a measure of carbon emissions by application to understand reductions are being secured.

Q2. What are the 3 issues that are most important to you in terms of climate change?

1. Local Plan carbon emission monitoring and performance evaluation. Having the ability to measure emissions and track performance when developments are considered.
2. Ensuring a true brownfield land regeneration approach.
3. Understanding landscape sensitivity so more renewable projects can be allowed in places that can receive them with least harm.

Q3. How would we address these 3 issues in the Local Plan?

1. Having the ability to measure emissions and track performance when developments are considered. Ensure applicants provide a statement and calculation of carbon emissions justifying climate change credentials of their proposals;
2. Have a brownfield target for delivering new development. When allocating sites for development ensure the reuse of brownfield land in urban locations as a priority.
3. Commission a landscape sensitivity study to identify acceptable locations for renewable projects.

Q4. What do you think are the main challenges we face in the district?

There may be a resistance to reduce carbon emissions if landowners in rural places have hope value for housing developments. The Council needs strict policy to discourage remote development due to being unsustainable from carbon emission impacts and car dependency.

Many People enjoy rural landscapes and are concerned about landscape and visual amenity harm resulting from the siting of certain types of renewable projects, such as wind turbines on top of moorlands. This is why there needs to be an overview of landscape sensitivity to understand better environments that can accept certain forms of development.

Q5. Below is a list of policies in our adopted Local Plan that we intend to revisit as part of this climate change review. Which policies do you think would be most effective in tackling climate change? (please tick all that apply)

In answer to question 5, CPRE is of the opinion that all the policies listed should be revisited, but we think the following are perhaps the ones with greatest value in supporting the needed action and change in development being planned:

- Strategic Policies & Land Allocation DPD SP8 Protecting the Natural Environment;
- Strategic Policies & Land Allocation DPD – T2 Cycling and Walking Network;
- Development Management DPD DM53 Renewable and Low Carbon Energy Generation;
- Development Management DPD Dm30 Sustainable Design
- Development Management DPD DM45 – Protection of Trees, Hedgerows and Woodland.

Q6. Are there any other policies not in this list that you consider we should revisit as part of the review to address climate change in the Local Plan? If yes please complete Q7 below

Yes

Q7. What would you do? Can you suggest examples?

Please see the work of the Town and Country Planning Association and the Royal Town Planning Institute as they have progressed good work. An excerpt from Planning for Climate Change, para.2.2.1 (TCPA/RTPI, 2018) “Local plans should be able to demonstrate how policy contributes to the Climate Change Act target regime, and this, in turn, means understanding both the baseline carbon dioxide emissions and then the actions needed to reduce emissions over time – which, in turn, means that annual monitoring reports should contain ongoing assessments of carbon performance against the Climate Change Act target”.

In June 2019 the Government based on latest scientific knowledge updated the Climate Change 2008 targets via Statutory Instrument 1056. It is the duty of the Secretary of State to ensure that the net UK carbon account for the year 2050 is at least 100% lower than the 1990 baseline. (2)“The 1990 baseline” means the aggregate amount of: (a)net UK emissions of carbon dioxide for that year, and (b)net UK emissions of each of the other targeted greenhouse gases for the year that is the base year for that gas.

Q8. What impacts do you think new planning policy in the context of climate change could have on your business, organisation or community?

The UK should be at the forefront of renewable technology and export skills and products across the world. It should support the economy and economic development. We should divest in fossil fuels that are bad for the environment.

For CPRE this means reconsidering the harm of renewables on landscapes and being more accepting in areas that traditionally we may have been resistant. We will still reserve the right to oppose certain developments if the harm is too significant, for example in upland remote places that lack manmade intrusions, as it may still be valid on landscape and visual impact grounds to oppose. However a district wide landscape sensitivity study would help guide where certain renewables are acceptable, and where they are not.

We have worked with the Oil and Gas Authority and Environment Agency to show why shale gas cannot be explored safely due to the highly faulted nature of Bowland Shale. We would not want to see shale gas development being considered across our geography.

For housing and employment development we advocate reusing brownfield land in urban locations in advance of greenfield. We think Green Belt is valuable in the context of climate change and should be protected.

All new developments should be assessed on carbon reduction merits, designing in solar PV on roofs, electric charging points, and SUDs. Exemplar schemes such as Halton Mill should be positively encouraged due to the win/win nature.

Q9. Please provide any other comments below?

Well done on reviewing the local policies so they are relevant against the declared climate emergency.