

MATTER 2

Submitted 5 September 2022

Matter 2: Climate Change and Economic Prosperity

Issue: Are the proposed policies on climate change and economic prosperity justified, effective and consistent with national policy?

2.1 Is Policy CC1 justified, effective and consistent with national policy, including paragraph 16 of the Framework?

Lancaster City Council Response

Yes. The council consider Policy CC1 to be Justified, in that it is an appropriate evidence-based policy which has considered reasonable alternatives through exploration of the overall themes in the topic papers and as discussed in the Local Plan Review Group (LPRG) briefing note on 22nd April 21 LPRG (page 7)¹, Effective in that it is deliverable and there has been joint working as evidenced by the Duty to Cooperate work and accompanying Statement of Compliance (P_10) signed by all parties, and Consistent with National Policy in that the policy enables the delivery of sustainable development in accordance with the policies in the Framework (in particular Paragraph 152 and 153).

As set out at paragraph 6.14 of the Statement of Consultation (P_07) the council consider that Policy CC1 is a high-level strategic policy that sets out a positive vision for the future as set out in paragraph 15 of the Framework. The policy ensures that climate change is placed at the heart of all planning application decision making. The policy complies with points (a)-(f) of paragraph 16 of the Framework. In relation to point (f) of the Framework, the policy was amended at Regulation 19 stage to ensure any unnecessary duplication did not occur. As set out in row 443 of Appendix H of document P_07, whilst the council did not consider the final paragraph of Policy CC1, as presented at Regulation 18 stage, to simply repeat paragraph 11 of the Framework, the council did subsequently remove this final paragraph of Policy CC1 following consultation for the purposes of clarity, and further strengthening compliance with point (c) of the Framework, indicating how

¹ [Planning Policy Team Site \(EGR\) - Item 1 CELPR Approach to policy preparation.pdf - All Documents \(sharepoint.com\)](#)

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the policy has been shaped by engagement with relevant consultees and stakeholders.

2.2 Is Policy SP4 justified, effective and consistent with national policy? Is the final bullet point of Policy SP4 appropriately drafted?

Lancaster City Council Response

Yes. The council consider the content and direction of Policy SP4 to be justified, effective and consistent with the 2021 National Planning Policy Framework. As a strategic policy, SP4 sets out the key ambitions of the City Council in terms of its economic priorities through the plan period in the context of the Climate Agenda and the City Council are keen to reflect its ambitions in relation to the promotion of green sectors of the economy, for instance low carbon energy generation and its support for local community wealth building projects.

The promotion of renewable/low carbon energy generation is consistent with the existing ambitions with the adopted Local Plan (2020) which, through Policy DM53, set out a supportive approach to a wide range of energy generation reflecting the existing economic strengths of the district in this regard, namely the location of Heysham Nuclear Power Station its position on the National Grid network and its proximity to Morecambe Bay which is a significant source of off-shore wind generation. The amendments to SP4 reflect the ambitions of the council to also pursue opportunities for wider low carbon generation should the opportunities be realised, and appropriate proposals come forward.

Reflecting the aim in the Local Plan for a 'Fabric First' approach within new development, the council are mindful that it is important to ensure that recognition is given to taking a positive approach to facilitate the skills and training required to do this. SP4 recognises this expectation and the need to upskill and train people accordingly. Further support is given to opportunities for skills and training via DM28 of the Development Management DPD which relates to Employment and Skills Plans. The council have an adopted Supplementary Planning Document (SPD) in relation to this issue and it is the intention to update this SPD following the adoption of the Partial Review to reflect the importance of skills and training in relation to construction of low-carbon homes and buildings.

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The council recognise there is a drafting error in the final bullet point of SP4, the bullet point should read: *'To support transition to a low carbon economy, supporting major renewable energy projects in appropriate locations and where they do not conflict with other policies in the Local Plan.'* This drafting error should be corrected as part of the minor modification process.

2.3 Would Policy SP4 allow for renewable energy projects to come forward in areas which form part of green and blue infrastructure networks?

Lancaster City Council Response

Yes. The adopted Local Plan (July 2020) sets out a positive position in relation to supporting renewable energy projects and the changes made as part of this review process have sought to further clarify and quantify that support moving forward.

The council believe that Policy SP4 clearly identifies support for renewable energy projects and, through the final bullet point, it provides the necessary safeguards to ensure that such projects can only come forward in appropriate locations and where they are consistent with other policies in the Local Plan.

The council consider that, when read as a whole, the Plan provides sufficient safeguards and protections to environmentally sensitive sites from inappropriate development which may harm its value.

2.4 Has sufficient consideration been given in Policy SP4 to the effect of major renewable energy projects on existing businesses locally?

Lancaster City Council Response

Yes. The council believe that the implications of Policy SP4 have been fully considered in the context of supporting major renewable energy projects in the district. The council consider that, should any major projects come forward, there are sufficient safeguards within the wider plan to ensure that the positives and negatives of such a proposal can be sufficiently considered including the effects upon existing businesses.

With regard to the economic impacts of a proposal on local businesses, any proposal would be considered in the context of Policy DM53 which states in criterion III that proposals must demonstrate *'The wider environmental,*

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economic, social and community benefits directly related to the scheme outweigh any significant adverse effects.' It is considered that the implications of any major renewable energy project can be considered on a case-by-case basis using the existing framework in the Local Plan.

2.5 Do the requirements of Policy SP9 duplicate other policies?

Lancaster City Council Response

No. The council consider that Policy SP9, as a strategic policy, sets out a high-level position in relation to how the Plan will support the creation of strong and vibrant communities and sets out the ambitions of the council in this regard. These high-level ambitions are then reflected in more detail through other Policies within the Plan.

The majority of SP9 remains unchanged from the adopted Local Plan. As part of the review process the council have included reference to the implications of Climate Change on community resilience, but the detail on how such implications will be addressed are provided within other policies in the Local Plan. The Council do not consider the content of SP9 to duplicate other policies within the Plan.

2.6 Is new criterion V of Policy DM57 on resilience to climate change justified?

Lancaster City Council Response

Yes. Climate Change related events such as increased frequency of heatwaves and flood events can have a seriously detrimental impact on human health and physical and mental well-being. The council considers that the new criterion V should be included to ensure that adaptation measures which provide resilience to extremes in temperature and rainfall are appropriately considered in developments at the outset. The council considers that the inclusion of this criterion is an appropriate approach, based upon not just local evidence of the impact of climate events (such as the devastating impacts of Storm Desmond on the Lancaster District in 2015) but national evidence which highlights the negative impacts that climate events can have on health and well-being and how the need to provide adaptation measures is necessary.

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The recent record-breaking heat waves in the summer of 2022 highlights the critical need to address overheating in homes and buildings in England. Already in England hundreds of deaths a year are related to heatwaves. At the same time excess winter deaths are in the thousands. As well as causing death and injury and impacting mental health, flooding costs the economy hundreds of millions of pounds (or in 2015/16 £1.6 billion) in damage each year. The Office for Health Improvement & Disparities recently published Guidance on Climate and Health as part of *All Our Health*, and highlights the detrimental impact that climate change can have on physical and mental health as well as the areas where climate and health intersect. This includes active travel, improving energy efficiency in homes, protection from overheating, improving green spaces and mitigating flooding.

Increasing the resilience of new development in the District to climate change provides the dual benefit of responding to climate change and meeting the health and wellbeing needs of residents and visitors.

2.7 Do the requirements of criterion IX of Policy DM57 unnecessarily duplicate the requirements of policies on transport?

Lancaster City Council Response

No. The council does not consider criterion IX to duplicate policies on transport. Instead, it is intended to support and harmonise with these policies and highlight the significant impacts that achieving greater levels of modal shift can have on the health and well-being of the resident population. The inclusion of the text at IX is explanatory in highlighting that the network of safe pedestrian and cycle routes will assist in supporting greater levels of modal shift than currently exists, which is a key Climate Change related aim and it was considered that this should be highlighted as part of the partial review. The Office for Health Improvement & Disparities' Guidance on Climate and Health as part of *All Our Health* emphasises the co-benefits for climate and public health in shifting to active travel, to help reduce disease related to physical inactivity and reducing the impacts of air pollution related illness.