

# **Climate Emergency Review of the Local Plan for Lancaster District**

Independent Examination Hearing Sessions

Opening Statement by Lancaster City Council

Hearing Day 1 – Tuesday 4<sup>th</sup> October 2022

Firstly, on behalf of Lancaster City Council I would like to welcome the Inspector, Joanna Gilbert and the Programme Officer, Carole Crookes, and all those attending, virtually, to Morecambe Town Hall on this opening day of the local plan Examination hearing sessions.

To introduce the plan to the hearing sessions I would like to provide some background about the context and objectives of the Climate Emergency Review of the Local Plan and describe how the plan aims to achieve development outcomes that better address the growing and unprecedented challenges to humanity presented by our changing climate.

On 30<sup>th</sup> January 2019 Lancaster City Council joined the list of thousands<sup>1</sup> of Local Government organisations across the globe in declaring a climate emergency and committing to action to mitigate damage to the environment and help communities adapt to the effects of the climate crisis. This declaration specifically committed the council to ensuring that the organisation reaches net zero emissions by 2030 for its own activities and leads the way in helping other organisations in the district to reach the same. One of the ways that the council is helping to realise this is by undertaking a Climate Emergency Local Plan Review.

When the declaration was made the adopted Local Plan was still in preparation but was too far advanced to incorporate the outcomes of the declaration. In July 2020 when resolving to adopt the Local Plan the council committed to undertaking an immediate review of the Local Plan to help achieve better development outcomes for climate change mitigation, adaptation, and resilience.

In the few years since that declaration, observations of the impacts of climate change including the setting of new temperature records have been become ever more concerning and at the same time international events have demonstrated the volatility of the costs and supply of hydrocarbon fuels.

Lancaster City Council's declaration followed a calendar year when average UK domestic electricity bills had been £672 and average gas bills had been £646. On 26 August 2022, the energy regulator Ofgem announced an 80% increase in the UK energy cap, meaning that a typical household (with average consumption, dual fuel and paying by direct debit) could be paying an annual bill of £3,549 from 1 October 2022. The regulator also warned prices could get significantly worse through 2023. Climate resilience and community resilience are strongly associated.

The partial review re-visits thirty-two key policies in the adopted Local Plan. These policies have been positively prepared to help realise development outcomes that; contribute to reductions in carbon emissions, better address the climate emergency in the district and increase the district's ability to adapt to the changing climate. The revised policies also emphasise support for the infrastructure and renewable development needed to realise this transition.

Paragraph 153 of the National Planning Policy Framework (NPPF) states that plans should take a proactive approach to mitigating and adapting to climate change and contribute to the achievement of sustainable development. To better enable integrated policy approaches the Partial Review of this Local Plan is framed around five key topic areas:

- Sustainable Design, energy efficiency and renewable energy generation
- Heritage in the context of climate change

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<sup>1</sup> [Climate emergency declarations in 2,268 jurisdictions and local governments cover 1 billion citizens - Climate Emergency Declaration](#)

- Strategic Transport
- Water Management
- Green & Blue Infrastructure.

The revised policies are intended to provide positive solutions for mitigation and adaptation and at the same time provide co-benefits for communities. One such example is the delivery of multifunctional green infrastructure which has a primary use as a flood resilience measure, but which also contributes to positive placemaking by being pleasant to walk in and cycle through, delivers habitat improvement and biodiversity net gain, and also provides landscaping that will help to reduce heat island effects which can impact on building energy performance.

The NPPF states that “the planning system should [...] shape places in ways that contribute to radical reductions in greenhouse gas emissions.” Across the district, residential buildings account for close to 20% of the district’s carbon emissions profile<sup>2</sup>. The scale of the opportunity in this sector means that there is much that can be achieved if new residential development begins to reduce its contribution to this section of the emissions profile and begins to follow the pathway to helping reduce carbon emissions to net zero.

Central to the review of this Local Plan is a ‘fabric first’ approach to energy efficiency, with the creation of a new policy, Policy DM30a: Sustainable Design and Construction, which focuses on reducing the carbon emissions of new buildings, with an emphasis on emissions associated with regulated energy<sup>3</sup> in residential development. This policy follows a stepped approach to decarbonisation providing the development industry with time to adjust.

Lancaster City Council’s and Central Government’s targets are mostly aligned regarding carbon reduction targets. Like the Building Regulations, Lancaster City Council is focused on reducing carbon emissions associated with regulated energy at both the 31% and 75% stages at plan adoption and in 2025, respectively. However, Lancaster City Council is requiring that carbon reductions be made in first instance by improving building energy efficiency through improved building fabric before reaching to offsetting home energy use with renewable energy. In 2028, Lancaster City Council takes a step further for net zero homes<sup>4</sup> independent of relying on the grid decarbonising as is the Government’s approach.

We not only need to reduce emissions, but we also must also help to ensure that residents can afford to keep their homes warm and help insulate people from the volatility in the energy market. The fabric first approach means that energy use in a home is reduced as far as possible firstly, thereby providing positive co-benefits of carbon reduction such as helping reduce fuel poverty and helping improve health and wellbeing of occupants.

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<sup>2</sup> SCATTER 2019

<sup>3</sup> Homes are 18% of all emissions in the District. Regulated energy is about 50% of the operational energy of a building and often the most carbon intensive. If all the regulated energy for homes across the district were net zero we would get rid of roughly 9% of the emissions associated with Lancaster. Grid decarbonisation is projected for 2035.

<sup>4</sup> The NPPF states that in Paragraph 157. *In determining planning applications, local planning authorities should expect new development to: (a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable;* which would provide additional support for having a net zero policy as solar pv is a form of decentralised energy supply. The burden of demonstrating it does not work lies on the applicant.

The reviewed plan acknowledges that moving towards net zero will necessitate a holistic approach to the design and construction of homes. This includes improved insulation, airtightness, and improved window glazing to prevent heat loss. The NPPF is clear that new development should be expected to “take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.”<sup>5</sup> This is supported through a strengthened sustainable design policy DM29. This will save energy overall and, therefore, both money and emissions.

Commercial buildings also are contributors to the carbon inventory in Lancaster and so DM30a requires that certain major non-residential development meets BREEAM Excellent standard.

Critically the current emissions inventory associated with existing building stock is also going to have to be decarbonised over time with the opportunity presented by investment. The council has therefore included greater support for net zero retrofits. The district’s built fabric includes many heritage assets; these establish the unique local character of the townscape and landscape and so must be capable of resilience to a changing climate. Two new policies in relation to retrofitting buildings of traditional construction and micro-renewables in the setting or curtilage of heritage assets are proposed. These can help ensure that historic buildings’ fabric and heritage value are maintained as they are appropriately adapted to the changing climate.

The energy landscape is changing rapidly too and indeed must change in order to deliver net zero development. So in line with the NPPF<sup>6</sup>, the review has increased emphasis on the key role that renewable energy generation, distribution and storage plays in climate mitigation within new development. This also includes heat networks in line with the Government’s direction of travel on decarbonisation of building heating including as identified in the NPPF<sup>7</sup>.

Also proposed is a greater focus on enabling active travel networks and connectivity as well as supporting infrastructure particularly through the adoption of Cycle Infrastructure Design Guidance Local Transport Note 1/20 where relevant. The council has also set out expectations on Electric Vehicle infrastructure provision to support the transition to decarbonised travel.

The district has experienced several severe flood events in recent years. The revised policies aim to create safer and more resilient places which make the most of nature-based solutions and provide communities access to homes, businesses and open spaces which promote greater health and well-being. The policies aim to ensure new development is not placed at risk of flooding either now or in the future and that opportunities presented by new development to reduce the causes of flood risk are encouraged by the NPPF and PPG.

Policy DM34 sets out a sustainable drainage hierarchy which is compatible with the Planning Practice Guidance, it places priority on multifunctional SuDS reflecting the NPPF and especially the recently updated PPG which now places greater emphasis on such processes. The policy includes an allowance for flexibility where the need for this has been demonstrated.

To accompany and support the Reviewed Plan the City Council has prepared a Green and Blue Infrastructure Strategy. This Strategy aims to help the Local Plan’s policies to better achieve protection and enhancement of the natural environment in a more integrated way.

The GBI strategy includes interactive maps that identify the existing network of Green (land) and Blue (water) infrastructure and highlight opportunity areas.

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<sup>5</sup> See paragraph 154 and quote from paragraph and 157

<sup>6</sup> See NPPF paragraphs 152, 155, 156, 157, 158

<sup>7</sup> See paragraph 155 (c)

If the Local Plan review were to be found sound, then, upon adoption the revised policies have the potential to realise development that could contribute to the transition to a low carbon future in the face of a changing climate, including through:

- Net zero carbon homes being approved by 2028 without reliance on the decarbonisation of the national grid.
- Increased emphasis on the key role that renewable energy generation, distribution and storage plays in climate mitigation within new development.
- A greater focus on active travel networks and connectivity as well improved expectations on Electric Vehicle infrastructure provision.
- Better consideration of flood risk and water management to respond more strongly to issues of surface water run-off and water efficiency.
- Introducing a strategic focus on habitat and ecosystem connectivity and function, which will ensure greater protection and enhancement of the district's Green and Blue Infrastructure.

In the context of a growing Climate Emergency, in parallel with fuel-affordability and supply volatility concerns, the Local Plan proposes timely, yet realistic, revised policy approaches that aim to ensure that the development quantum needed to house our communities and drive our economy can still be achieved but with improved development outcomes for the climate and community well-being.

The City Council believes its Reviewed Local Plan to have been soundly prepared and capable of achieving enhanced appropriate policy approaches to achieving more climate-aware outcomes.

The City Council believes that by advancing this interim Local Plan review it can help achieve positive and appropriate development outcomes in the public interest. The Council recognises that the Review has generated strong support from those who welcome action to enable beneficial outcomes but has also raised considerable concern from some parties who perceive challenges in delivering these outcomes. The Council wishes to engage positively in the dialogue that this Examination facilitates to produce a plan which is fit for purpose whilst properly addressing the Climate Emergency in a substantive and timely manner.

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