

NORTH NORTHAMPTONSHIRE JOINT PLANNING COMMITTEE		Item 5	Page 1 of 10
Date	23rd OCTOBER 2019		
Report Originator	HEAD OF NORTH NORTHAMPTONSHIRE JOINT PLANNING & DELIVERY UNIT		
Title	CLIMATE CHANGE EMERGENCY		

1. PURPOSE OF REPORT

- 1.1 To consider the implications of the climate change emergency for the North Northamptonshire Strategic Plan and Part 2 Local Plans.

2. BACKGROUND

- 2.1 Climate change is now the greatest challenge facing our society. The scientific evidence of climate change is well-established, and its impacts will be severe. It is often seen as a long-term challenge, but the impacts of climate change are being experienced now through both unprecedented global trends and more localised severe weather events. In its Climate Impacts Tool (April 2019), the Environment Agency projects that by the 2050s England will experience (i) +7.4°C increase in the average summer temperature, (ii) -45% less summer rainfall, (iii) +4.4°C increase in the average winter temperature, (iv), +50% peak river flows and (v) +0.6m sea level rise, amongst other impacts.
- 2.2 In December 2015 the United Nations Climate summit held in Paris delivered the “Paris Agreement”, the main aim of which is to hold the increase in the global average temperature to “well below” 2 degrees above pre-industrial levels and to pursue efforts to limit warming to a maximum of 1.5 degrees¹. It also makes clear that this should be “implemented to reflect equity”, with the expectation that developed countries should continue to take the lead. Through this Agreement, the Intergovernmental Panel on Climate Change (IPCC)² was commissioned to provide a special report on the impacts of global warming of 1.5 degrees. “*Global Warming of 1.5°C*” was published in October 2018³. Produced by the world’s leading climate scientists⁴, the key finding was that meeting a 1.5 degrees target is possible but would require “deep emissions reductions” and “rapid, far reaching and unprecedented changes in all aspects of society”. To achieve the 1.5 degrees target requires a 45% reduction in carbon emissions by 2030 and net zero by 2050.

¹ Beyond which even half a degree will significantly worsen the risk of drought, floods, extreme heat and poverty for hundreds of millions of people.

² The UN body for assessing the science related to climate change

³ Global Warming of 1.5°C. An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty

⁴ The IPCC considers this report the authoritative, scientific guide for governments to deal with climate change

- 2.3 The Climate Change Act 2008 is the basis for the UK's approach to tackling and responding to climate change. It requires that emissions of carbon dioxide and other greenhouse gases are reduced and that climate change risks are prepared for. Through this Act the government committed to reducing the UK's greenhouse gas emissions by at least 80% of 1990 levels by 2050.
- 2.4 The 2008 Act also established the Committee on Climate Change (CCC) as an independent statutory body to advise the Government on emissions targets and report to Parliament on progress made in both meeting these and preparing for climate change. In May 2019 the CCC published "[Net Zero – The UK's contribution to stopping global warming](#)", outlining details of future risks to the UK as a result of local and global climate change. A key output of this report was the recommendation that the UK greenhouse gas target was updated to net zero by 2050. This was endorsed by Government in May 2019 when the House of Commons went further to declare a climate emergency. This was followed by legislation being passed to amend the Climate Change Act in June 2019 and enshrine this new target in law.
- 2.5 The international and national action referred to above has taken place against a backdrop of heightened public concern, manifested through the School Strike movement and the civil protests by Extinction Rebellion. This public concern has prompted political action at the local level, with Bristol City Council being the first local authority to declare a climate emergency and a public commitment to achieve carbon neutrality by 2030 (20 years ahead of the recommendations of the IPCC). Other UK local authorities, including Northamptonshire County Council and Wellingborough, Kettering and Corby Councils have since either declared climate emergencies or committed to playing their part in delivering on the national commitments.
- 2.6 The national and local declarations of a climate emergency have put renewed focus and urgency on how the councils, across all their activities, can help to tackle the causes and impacts of climate change. This needs to be coordinated across NN as it will be a key issue for the new unitary authority. The Northamptonshire Climate Change Officers Group (NCCOG) led by the county council, brings together local authorities and other key organisations to prepare and monitor the [Northamptonshire Climate Change Strategy](#). The update of this strategy will draw on new evidence including the [SEMLEP energy strategy](#) published in December 2018.
- 2.7 This report focuses on how the climate emergency must be addressed in the statutory development plan. It summarises the requirements of legislation and national policy and highlights representations made to the local planning authorities by the environmental law charity ClientEarth. The relevant provisions of the current JCS are outlined and some pointers provided on how

the update of the JCS (the new NN Strategic Plan) will need to address the climate emergency, and what can be done in the meantime.

- 2.8 It is important to emphasise that, whilst the statutory development plan and development management have an important role to play at local planning authority level, they need to be complemented by effective national regulations, fiscal incentives and other measures (including the co-ordination of local authorities functions, priorities, actions, and investment) to decarbonise the economy and change the way people live. This is illustrated in the diagram at Appendix 1 (from the CCC July 2019 report – [*“Reducing UK emissions – 2019 Progress Report to Parliament”*](#)), which shows the transition required across all areas of human activity to achieve net zero by 2050.

3. CLIMATE CHANGE AND PLANNING POLICY

- 3.1 Local Plans are required to contribute proactively to meeting national and international climate commitments. Section 19 (1A) of the Planning and Compulsory Purchase Act 2004 states:

“Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change.”

- 3.2 These legal requirements are supported by national planning policy and guidance which must be considered in the preparation of development plans. Chapter 14 of the NPPF states that:

“The planning system should...help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions...Plans should take a proactive approach to mitigating and adapting to climate change...In line with the objectives and provisions of the Climate Change Act 2008.” (Paras 148 and 149 – including footnote 48).

- 3.3 The NPPF states that development plans must contain strategic policies to address the LPA’s priorities for the development and use of land. Paragraph 20 requires strategic policies to set out the overall strategy for the pattern, scale and quality of development. This includes *“planning measures to address climate change mitigation and adaption”*.

- 3.4 The “Climate Change” section of the Planning Practice Guidance also provides clear support for a comprehensive and proactive approach to climate change issues in local planning policy. In addition to referring to Section 19(1A) of the Planning and Compulsory Purchase Act 2004 (see above), it states that:

“In addition to supporting the delivery of appropriately sited green energy, effective spatial planning is an important part of a successful response to climate change as it can influence the emission of greenhouse gases... Addressing climate change is one of the core land use planning principles which the NPPF expects to underpin both plan-making and decision-taking. To be found sound, Local Plans will need to reflect this principle...” (Para 001).

4. CLIENTEARTH LETTER TO LOCAL PLANNING AUTHORITIES

- 4.1 The environmental law charity ClientEarth wrote in September 2019 to local authorities who are in the process of preparing Local Plans to invite them to put their area on a path to achieving net zero emissions by setting carbon reduction targets and integrating them throughout their Local Plans. Client Earth has also published a joint law and policy briefing with the Royal Town Planning Institute and the Town and Country Planning Association⁵.
- 4.2 ClientEarth considers that meeting legal and policy requirements requires LPAs to:
- i. set a local carbon target framework based on a comprehensive assessment of local carbon reduction potential, taking into account national and international climate targets;
 - ii. demonstrate proposed planning policies’ consistency with this local target framework; and
 - iii. monitor performance on at least an annual basis using relevant indicators.
- 4.3 This advice is consistent with previous guidance from the Royal Town Planning Institute and the Town and Country Planning Association⁶, which states that Local Plans need to be able to demonstrate and track how local policy contributes to meeting the target regime under the Climate Change Act.
- 4.4 ClientEarth notes that these obligations in respect of emissions are in addition to the corresponding duty in respect of adaptation to climate change, which requires at a minimum that authorities plan in line with Environment Agency advice and support the delivery of national policy including the National Adaptation Programme.
- 4.5 Local authorities have been asked to respond to ClientEarth by 28th October 2019 with feedback as to whether they intend to include carbon reduction

⁵ Planning for Climate Change – Law and Policy Briefing, TCPA, RTPI, Client Earth September 2019

⁶ [Rising to the Climate Crisis – A Guide for Local Authorities on Planning for Climate Change, TCPA/RTPI December 2018.](#)

targets in their Local Plan. Litigation may be explored in the event local authorities do not comply with their legal obligations.

5. IMPLICATIONS FOR NORTH NORTHAMPTONSHIRE

- 5.1 Strategic policies for NN authorities are contained in the Joint Core Strategy, the update of which will be referred to as the NN Strategic Plan. This forms Part 1 of the Local Plan. The Part 2 Local Plans provide more detail on non-strategic matters including smaller site allocations. The Part 2 Local Plan for Wellingborough was adopted in February 2019 and the other three are well advanced.
- 5.2 As set out at paragraph 3.3, the NPPF is clear that climate change is a strategic issue and as such it should be addressed principally in the JCS/ NN Strategic Plan rather than the Part 2 Local Plans.
- 5.3 The 2016 JCS was prepared and examined under the legislation and policy that existed at the time of its development. It was independently assessed through both Sustainability Appraisal and public examination and found to be sound.
- 5.4 Climate change is an important theme running through the current JCS. Key measures are summarised below:
- Adaptability to climate change and resilience and the delivery of low carbon growth is part of the Vision;
 - Adaptability to future climate change is one of the 10 outcomes sought by the plan;
 - Ambitious policies are set out to deliver these aspects of the vision and outcomes by supporting the development of new environmental technologies, protecting and enhancing the natural environment and ensuring that new development is located and designed to mitigate the impact of climate change. Specific policies include;
 - Policy 8 – North Northamptonshire Place Shaping Principles. This Policy seeks to deliver high quality development locally and outlines a range of criteria which development proposals should satisfy. These include creating connected places through linking into existing cycle, pedestrian and public transport networks, providing direct routes to local facilities to create more walkable neighbourhoods, contributing towards enhancements to the existing public realm such as tree planning.
 - Policy 9 on sustainable buildings requires new development to incorporate measures to ensure high standards of resource and energy efficiency and reduction in carbon emissions.
 - Policy 14 – Deenethorpe Airfield Area of Opportunity. This Policy seeks a carbon neutral development. This will be achieved through a range of

measures including the production of a bespoke energy strategy outlining how most of the energy requirements for the development can be met on site from renewable and low carbon sources, buildings being of exemplary construction standards (including systems to reduce their energy demand), investing in tree planting in the Rockingham Forest⁷, strengthening the local GI network through new linkages and making provision for dedicated cycle and pedestrian links throughout the scheme to facilitate modal shift.

- Policy 21 – Rockingham Forest. This policy seeks regeneration of the forest to increase carbon storage, strengthen biodiversity, landscape character and green infrastructure, amongst other benefits, with an annual target to deliver 40ha a year of new tree planting (as part of the Rockingham Forest for Life).
- Policy 26 – Renewable and Low Carbon Energy. This Policy supports such proposals subject to their demonstrating compliance with a range of criteria. It also identifies “Land at Burton Wold” as an Energy Park linking energy production on site with a mix of employment uses amongst other criteria.
- Strategic Site allocations – Policies 32, 33, 37 and 38 require energy strategies to be worked up alongside development proposals. These are to ensure that the highest viable amount of heat and energy used within the development is generated on site from renewable or low carbon sources.
- Natural Capital and Ecosystems Services – the JCS seeks to enhance ecosystems and the services they provide via the landscape and interaction of species and their habitats.

5.5 The JCS is considered to provide a robust policy basis for adaptation and mitigation to climate change consistent with national legislation and policy at the time it was prepared. The Development Plan for each of the 4 Districts/ Boroughs includes both the JCS and the Part 2 Local plan. Thus, the strategic policies in the JCS apply in each authority in conjunction with the Part 2 local plan, and those Part 2 local plans will be tested at examination for conformity with the strategic policies of the JCS. Part 2 local plans also require a Sustainability Appraisal which needs to identify and evaluate the proposed plan’s cumulative effects on the climate and its reasonable alternatives

5.6 It is recognised that the JCS approach to climate change will need to be strengthened and be developed further in the NN Strategic Plan, reflecting new legislation and national policy, including the national 2050 net zero target which was enacted in June 2019. This will allow the issues raised by ClientEarth to be addressed at the appropriate strategic level.

5.7 Updating strategic policies will require the JPDU to review and refresh the evidence base. The JPDU will work with the NCCOG to ensure that this

⁷ As outlined in the Masterplan and Delivery Strategy for Tresham Garden Village (July 2019), 100,000 trees will be planted at the site as part of the proposals

evidence and the resultant strategic policies are consistent with and support delivery of the Northamptonshire Climate Change Strategy. Engagement will also be sought with wider stakeholders to ensure that the NN Strategic Plan builds on good practice elsewhere in the UK and beyond.

- 5.8 A particular area of focus for the NN Strategic Plan is likely to be policies and proposals aimed at reducing the need to travel and encouraging modal shift to walking, cycling and public transport (the Northamptonshire Climate Change Strategy indicates that transport accounted for 38% of carbon emissions in Northamptonshire in 2015, compared to 35% from industry and commerce and 27% from domestic properties). Planning practice guidance indicates that sustainability appraisal should be used to test different spatial options in plans on emissions.
- 5.9 In advance of the update of the NN Strategic Plan, the focus should be on the implementation of existing JCS policies that will contribute to climate mitigation and adaptation (see paragraph 5.4 above). This will require training/ capacity building and practical guidance for those involved in the development management process including the LPAs, Local Highways Authority, Lead Local Flood Authority and the development sector. The Place Shaping Supplementary Planning Document will provide an opportunity to set out further guidance on the creation of sustainable and successful developments.
- 5.10 The focus on climate change issues also provides an opportunity to reinvigorate existing strategic initiatives in the JCS. This includes the Rockingham Forest for Life (RFfL) project supported by JCS Policy 21. The CCC report identifies afforestation as playing a key role in helping the UK meet its 2050 net zero ambitions (the report suggests that UK forest cover should increase from 13% to 17% by 2050). The RFfL project was developed with the River Nene Regional Park (RNRP) with funding support from Defra/ Forestry Commission for a Carbon Sink Forestry Feasibility Study. The project has stalled due to lack of funding, although significant tree planting has been delivered by landowners and developers (notably on the Boughton Estate and at the proposed site of Tresham Garden Village). The opportunity exists to revisit this project alongside work on natural capital delivery and enhancement as well as wider net environmental gain, and to extend the scale of this through the North Northamptonshire Strategic Plan. The JPDU is considering how this project can be resourced.
- 5.11 This local action is vital but, as noted at paragraph 2.8, it is essential that it is supported by effective measures at the national level. For example, policies to reduce the need to travel and to support modal shift need to be supported by investment in high speed broadband and attractive public transport services.
- 5.12 National regulations are also important. Members may recall that the Submission Joint Core Strategy contained provisions to identify “Allowable

Solutions” as part of a move towards zero-carbon homes consistent with national policy as existed at the time. This would have created a mechanism for new development to contribute to carbon reduction through projects such as the Rockingham Forest for Life or retrofitting of existing housing stock and public buildings. However, this was removed during examination of the JCS following the Government’s decision to cancel its commitment to require zero-carbon homes by 2016 through building regulations.

- 5.13 The Government now appears to be looking to address this gap through the recent launch of a consultation on a “*Future Homes Standard*” (October 2019)⁸ which takes account of the net zero commitment by 2050 introduced through the amended Climate Change Act 2008. This is welcomed in principle and the NNJPDU will review and respond to the consultation on behalf of the JPC (in consultation with the Chairman and Vice Chairman).

6. CONCLUSIONS

- 6.1 Climate change is a fundamental challenge that must be addressed in development plans for North Northamptonshire, as well as in development management decisions and the wider delivery activities of the councils. Strategic policies to mitigate and adapt to climate change need to be set out in the strategic plan for NN.
- 6.2 The adopted JCS provides a strong suite of policies on this issue but does not set a local carbon reduction framework/ trajectory to meet the national 2050 zero carbon commitment. This will be addressed in the new NN Strategic Plan, with technical work commencing in 2020. The JPDU will work closely with the NCCOG and other stakeholders to ensure that the NN Strategic Plan builds on good practice elsewhere.
- 6.3 In the meantime, there is a need to implement existing JCS policies and initiatives that respond to climate change, including the Rockingham Forest for Life and other green infrastructure proposals. The JPC will be updated on progress at its next meeting.
- 6.4 Good planning can contribute to meeting zero carbon by 2050 but it is essential that local planning policies are supported by effective measures at the national level. The proposed Future Homes Standard is welcomed as a step in the right direction.
- 6.5 Finally, it is important to note that planning is just one of the functions that the Councils are responsible for and the climate emergency will need a coordinated

⁸ This consultation focuses on stronger building regulations that will pave the way for the Future Homes Standard. It will require new build homes to be future proofed with low carbon heating and world-leading levels of energy efficiency. This will be introduced by 2025. Consultation closes January 10th 2020.

response across all areas of activity. The unitary authority will provide opportunities to achieve this, for instance through closer integration of planning and transport functions.

7. RECOMMENDATIONS

7.1 The Head of the Joint Planning and Delivery Unit recommends that:

- 1. The Joint Planning Committee recognises that the mitigation of, and adaption to climate change must be a fundamental component of the North Northamptonshire Strategic Plan;**
- 2. The JPDU should begin work to refresh and strengthen evidence base around climate change and energy issues including technical work with NCCOG and other stakeholders;**
- 3. An update on existing JCS initiatives including the Rockingham Forest for Life should be presented to the next meeting of the Joint Planning Committee;**
- 4. In consultation with the Chairman and vice Chairman, the JPDU should respond to the Government's consultation on the Future Homes Standard.**

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APPENDIX 1

Figure 3.2. The transition required for Net Zero over the period to 2050



Source: CCC (2019) *Net Zero - The UK's contribution to stopping global warming*.