



Climate Action Leicester and Leicestershire briefing for climate responses to the Charnwood Local Plan consultation. Summer 2021.

Please respond to the Charnwood Local Plan consultation before 5pm on 23rd August when it closes.

You can read the plan, and also access the online consultation form here:

https://www.charnwood.gov.uk/pages/charnwood_local_plan_2021_37

However, the consultation form is unhelpfully laid out for the kinds of comments we want to make. We recommend that instead, you send an email with your comments to

localplans@charnwood.gov.uk

Make sure you include your name, address, postcode (preferably within Charnwood if you live or work there as it gives you more weight). Make it clear that this is your response to the Charnwood Local plan 2021-2037 (pre-submission draft) consultation.

Below are some points we would like you to make in your own words. The first one is essential – but you can pick and choose for the others, depending on time and interest.

1. **Charnwood’s Local Plan is not sound.** This final consultation is about if the plan is “sound”. Our position at Climate Action Leicester and Leicestershire is that it is not sound – because the policies in it do not adequately address climate change, and the NPPF (National Planning Policy Framework) requires that they do tackle climate change. Given the urgency of the climate situation, the following is needed and should be made policy in this plan:
 - a. new development needs to be carbon zero and be fit to live and work in as the climate crisis intensifies,
 - b. local renewable energy generation needs to be prioritised, both to decarbonise the UK and for power security as we move away from fossil fuels

The remaining points are reasons why we do not believe this local Plan is sound.

2. **Weak climate policy phrasing.** Where policies about climate change exist, they tend to be extremely weak, using phrases like “we will encourage” and “we support”. These need to be replaced with phrases such as “we will require” and “planning permission will only be granted if”.

3. **Comment on a specific policy.** Here are five specific policies which should be changed:
- a. Policy CC3, Renewable and low carbon energy installations. It's good that they are supporting new renewable development. However, this policy only gives support for small and medium wind turbines which is a huge loss of opportunity. Bigger ones are much more energy efficient and the underlying evidence commissioned by Charnwood Council in their Renewable and Low Carbon Study (page 65) does identify areas in which large and very large turbines could be built. Development areas should be allocated for these larger sizes.
 - b. Policy CC4, Sustainable construction. This lacks requirements for energy efficiency, and also for a fabric first / very high level of insulation approach in new buildings. It currently requires design and layout which would allow for future low carbon energy generation where viable (a phrase which means it can be avoided by developers), but it should require actual energy generation to be built in at the start – adding it later is much more expensive, time consuming and has a higher carbon footprint. Retrofitting does not make sense when it can be done from the start.
 - c. Policy CC5, Sustainable transport. This policy should, but currently does not, require the design of major new housing developments to result in a substantial modal shift away from car to active and public transport – and require evidence that there is good reason to expect that development design will achieve this.
 - d. Policy PT3, Car parking standards. This Local Plan is taking a predict and provide approach to parking attempting to meet demand. This will result in additional car use and undermine any attempted shift to sustainable transport options. Instead, this policy should require all new major developments to put in place design measures and other measures to actively discourage car use and create a modal shift to active and public transport.
 - e. Page 157, sequential test for logistics development. Freight is barely mentioned in this Local Plan except for saying it requires them to work with neighbouring districts which is true. However, they propose a sequential test which it is stated will be “recommended”. As it is placed within the golden triangle of logistics, this Local Plan should contain actual policy on logistics development requiring it to be near and use and support the development of freight train lines – this should be reflected in the sequential test.

Climate Action Leicester and Leicestershire has recently put together two checklists of the kinds of planning design which would result in reduced carbon footprint and increased capacity to cope with climate change.

They are intended to help you think about how green specific planning applications are, and they contain the kinds of design which should be required in this Local Plan.

You can see them here:

Housing development design:

<https://www.climateactionleicesterandleicestershire.org.uk/wp-content/uploads/2021/07/Climate-and-Sustainability-housing-development-checklist.pdf>

Transport and housing development design:

<https://www.climateactionleicesterandleicestershire.org.uk/wp-content/uploads/2021/07/Transport-and-the-climate-checklist.pdf>

