



Climate Action Leicester and Leicestershire,
52 Heyworth Rd,
Leicester,
LE3 2DB.

Dear Charnwood Local Planners,

This is a response to your Charnwood Local Plan 2021-2036 (pre-submission) consultation from Climate Action Leicester and Leicestershire.

We want to start by saying that we completely support your intention to keep new development concentrated near towns, large villages and the city. This has the potential to enable a much larger shift towards public and active transport than a more scattered approach, and so will both give people more opportunities, and keep travel related carbon footprints lower than they would otherwise be.

Having said that, your planning policies need to be much stronger when it comes to transport. It is not enough to provide public and active transport options – though that is essential. It is also necessary to require development patterns which actively discourage car use and achieve a substantial modal shift, for example by limiting parking, increasing housing density and providing nearby services so that walking is feasible, etc. We recently sent you our checklist for transport with these kinds of actions within it, and we submit it again now as part of this response as the kinds of policies we would like to see required in this Plan for new housing developments of above 10 homes.

Pg 15. We are very aware that this draft local plan barely mentions climate change in its vision. Given the enormous impact it is going to have locally and across the world, we would like to see it given much more emphasis.

Pg 16, environment, point 2. You state that your development strategy is “To reduce net greenhouse gas emissions, in support of achieving a carbon neutral Borough, and reduce and adapt to the impacts of climate change.” However, our key concern is that the phrasing of your climate and carbon emission related policies throughout this Local Plan is far too weak, and that development will therefore be given planning consent when it directly opposes and reduces your chances of either reaching net zero or adapting to the impacts of climate change. We believe that under the NPPF, this makes this Plan unsound as it currently stands.

Pg 16, environment, point 9. In spite of your stated strategy “To make efficient use of land, to limit the need for greenfield development and encourage the re-use of brownfield land and underused buildings.” we have not found policy which supports higher density housing. As Climate Action we see housing density as a key factor in building climate friendly development. Compact development allows for easy access on foot and bicycle and viable service by public transport. We advocate for a minimum housing density of 70 dwellings per hectare, but the aim should be to provide housing layouts that are compact and easy to access by means other than cars. We would like to see policy in this plan requiring a mixture of types, tenure, size

and cost of housing, some with and some without private and/or shared gardens, and including terraced and low levels flats, with a density of 70dph set as a minimum standard.

Pg 31, Policy DS1. We would like to see this policy calling for the delivery of a modal shift in transport rather than simply minimising the need to travel by private car, and also explicitly requiring development to reduce carbon emissions and be resilient to climate change.

Pg 33, Policy DS3. We appreciate that you plan to build several new primary schools and enlarge others, but we feel that in order to support people to move away from car use as well as promoting better physical and mental health, in the larger areas of new development additional secondary schools would also be helpful.

Pg 73 Policy DS5. This policy on high quality design refers to the Climate Change policies later in the document in chapter 7. However, we would like to see these policies incorporated into the other chapters of this local plan. As it stands the sustainable design policies are not only weakly worded, but also easily sidelined. This policy DS3 should require both net zero carbon for new development and high specified standards of climate resilience so that the resulting buildings are fit to live and work in in the future.

Chapter 7, Climate Change.

Pg 166, Policy CC1. This flood risk policy is a good example of a strong policy with the words “ensuring” and “requiring” used to make sure that the policy is acted on. This is the kind of wording we would like to see in policies CC4 and CC5.

Pg 168, Policy CC2. Points 2 and 5 of this policy need strengthening. Given that drainage is needed for every development, it makes sense for SuDs to be a requirement rather than an option.

Pg 171, Policy CC3. We are concerned that this policy limits wind turbines to small and medium scale. Given that this is a good area for wind, that as a rural area some people will continue to be car-dependant and will have to shift to electric vehicles, and the necessity to both decarbonise the grid and provide a secure local energy supply as fossil fuels are phased out, large and very large-scale turbines would be far more efficient and productive. Your own evidence base identifies areas which are appropriate for such developments. You should be supporting this wherever possible – along with the electrical infrastructure to cope with it. As it stands, you are passing up an opportunity to genuinely reduce the areas carbon footprint and increase its energy security. Wind turbines and the batteries, and other technology related to them have the potential to become an employment opportunity for this area. Please allow larger turbines.

We also question the small size of solar installations being allowed for – tree planting and hedges can help with landscape, and in the case of some areas the landscape sensitivity is low – so why such limited sizes?

We are concerned that this policy does not cover issues around biomass which is being widely promoted as renewable. Given that this is only the case if the feedstock is not especially grown, and if the biodigesters are systematically monitored and

maintained to prevent methane leaks, you should have policy in place to ensure that biomass development is genuinely sustainable from a carbon perspective and evidence of checks/maintenance is required for biodigesters.

Additionally, the policy's capacity to support renewable energy generation is weakened by the penultimate paragraph which seems to suggest that applications are likely to be refused.

Finally, we would like to see clearer policy wording to support wind and solar installations near villages where the community agrees projects to the benefit of the community.

Pg 192, Policy EV8. We are strongly in favour of the support this policy gives for retrofitting renewables and energy efficiency measures to old buildings.

Pg 173 Policy CC4. This sustainable construction policy is extremely weak. It is full of phrases such as "encouraging", "minimising" and "supporting". The wording needs to be strengthened to match CC1. The exceptions are your water and drainage policies which are excellently strong. Given the urgency with which climate change needs to be addressed, and the requirement in the NPPF to address it, it does not make sense to be developing buildings which will have to be retrofitted within a few years. In our opinion, this policy is deeply unsound.

There is nothing in it requiring high levels of energy efficiency, necessary to reduce the regions carbon footprint, nor anything requiring a fabric first approach to carbon reduction. Instead, these essentials are only encouraged. The one exception to this is point 9: "requiring the layout, orientation and design of buildings to improve efficiency of heating, cooling and lighting and to maximise the potential for daylight and passive solar gain". This point is good, but undermined by point 10:

"encouraging the design and layout of new buildings which enable low carbon energy generation to be installed from the start where viable, or at a later stage, including district heating". Clearly low carbon energy generation should be required to be installed from the start – it is a fraction of the cost of building, and much cheaper to do from the outset. Ideally heat-pump based district heating should also be put in from the start, but if you don't feel that this is economically viable, then the design should, as a minimum, support it being installed later.

Transport, including your traffic modelling and Infrastructure Report.

Pg 176, Policy CC5. This sustainable transport policy - as is the case with the other transport policies in this Local Plan – is extremely weak.

It should "require" not just "support" a shift from car to active and public transport options, and do this by requiring specific active demand management designs and requirements. Point 2 should require that evidence be provided that the design will create a substantial modal shift to sustainable transport. This policy should also require specific local services within 400m (schools, GPs surgeries, child care etc). Additionally, the whole policy should apply to all development, not just major developments.

Pg 177 CC6. This policy should include provision for electric bike charging and priority spaces within communities for carpool charging. It should also require 20% active charging and 80% passive charging facilities in both housing and business developments of over 10 homes/parking spaces, and charging in taxi bays.

Charnwood Borough Council has done considerable traffic modelling which shows that the proposed development in this Plan will overload the road network. It has also produced an Infrastructure Report which is used to justify seeking funding for road infrastructure; which is deemed "essential".

The breakdown of the Transport element of the infrastructure sought shows this is directed at a long list of projects very heavily weighted towards increasing the capacity of the road network to facilitate car use. Some of this is already associated with the 3 Charnwood SUEs: Thorpebury, Broadnook, and Garendon at Loughborough. Some of the bus funding has time and funding constraints so there is no longterm guarantee if these are not viable. Additionally the cycling and walking measures associated with the SUEs are typically limited to the specific development, when what is also needed is links to the wider network – and more importantly improvements to the wider network.

Many of the highway schemes seem of dubious benefit and uncertain delivery and the traffic modelling still shows unresolved problems. We feel this approach is completely at odds with the Local Plan's aim to achieve a modal shift from cars, NPPF Chapter 9 (in particular para 105), and the Department of Transport's Decarbonisation Plan which has an aim of achieving 50% of journeys in towns and cities by 2030. We think this makes the Plan unsound, since what is needed is active car demand management.

Specifically, Policy T3 on parking takes a predict and provide approach, without any car management. This policy undermines your air quality policy EV11. As you are surely aware, predict and provide encourages car use – active demand management would be far more sustainable from a carbon emissions perspective, and also give people far more resilience as active transport improves mental and physical health community cohesion and costs less supporting lower income households to have more opportunities. It is also widely accepted and proven now that a combination of carrots and sticks is far more effective in creating modal shift, than just providing opportunity to use sustainable transport options.

Pg 196, Policies EV9 and EV10. Both of these policies should include requirements for segregated cycle paths linking them to local communities.

Pg 155, para 5.33. Our final transport comment relates to logistics. Given the large local presence of logistics companies and the placement of Charnwood in the golden triangle of logistics, both Charnwood and the other local Councils should be both putting in place policies and working with local companies to encourage the shift of freight onto trains and ships, and away from road. In the case of this Local Plan, we suggest that the sequential approach to logistics should prioritise sites near to train freight lines and likely future train freight lines. It should also require logistics companies to support, contribute to and use such train freighting equipment.

Additional environmental comments.

Pg181, Policy EV2. Green wedges. Development should not be supported in green wedges unless it improves the carbon emissions and biodiversity of the space in question.

Pg 182, Policy EV3. Areas of local separation. Any development in these areas should be required to be carbon zero and at least 50% affordable housing with at least half of that social housing rather than privately owned.

Pg 184, Policy EV4. This Local Plan lacks any serious attempt to increase local food provision which is going to become much more important as climate changes takes a stronger hold and impacts on world food production more heavily. This forest policy should include ambitious tree planting targets with an emphasis on food trees, especially sweet chestnuts for starch and nut trees for protein.

Pg188, Policy EV6. We would like to see this biodiversity policy made stronger. This could be done by replacing "seeking" with "requiring", and "should be" with "will be". The last section on development which harms should require 30% net gain, not 10% which treats it like the other categories.

Pg 190, Policy EV7. For the reasons just given this policy should include an emphasis on food trees. Also a requirement for shade trees (at least half food trees) on streets, half of green spaces to have tree cover (again with an emphasis on food trees) require the keeping of trees (not just "where appropriate"), and if planting trees elsewhere in compensation to require payment for them to be looked after once planted and replaced if they do not survive.

Finally we want to say that the absence of proper carbon auditing makes this Local Plan inadequate as it stands. We do not believe this plan should go to public examination until it has been adjusted to contain more strongly worded policy around sustainable transport and climate change, and more support for wind and solar, as well as proper carbon auditing. As it stands, we do not believe it meets the requirements of either The Planning and Compulsory Purchase Act (section 19) or the NPPF (Paragraph 148) which require Local Plans to carbon audited, and to achieve radical carbon emission reductions in line with the Climate Change Act, and reaching zero by 2050. We hope you will revise it again before moving on to public examination.

Thankyou, Climate Action Leicester and Leicestershire, August 2021.