

COMMENTING ON LOCAL PLANNING APPLICATIONS
Draft guidance in respect of climate change
May 2023

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INTRODUCTION

There are three stages to consider when coming to the issue of commenting on planning applications:

1. Area Plans – it will be important to be involved in the consultation on any revision of the Local Plan from your local planning authority (usually the district council), which also applies to the Local Transport Plan from your local highway authority (usually the county council) and the Minerals Plan which deals with local issues such as quarrying.
2. Neighbourhood Development Plan (NDP) – writing key policies in your own plan will support the comments you make on any development applications, though your policies must chime with those in the planning authority's Local Plan.
3. Planning Applications – as well as referring to the specifics in the Local Plan and your NDP, there will be some general things you can probe in addition, based on national guidance.

It may be useful for parish and town councillors who sit on planning committees to take advantage of the training courses in planning run by their local county association or other bodies.

1. AREA PLANS

a) LOCAL PLAN

Local planning authorities are required to produce Local Plans at 5-year intervals to act as guidance when deciding any planning applications in their authority area. This includes National Park authorities for any planning applications within their National Park.

All Local Plans should reflect the climate change guidance in the UK Government's National Planning Policy Framework (NPPF - see Appendix 1 below).

When considering and commenting on the draft Local Plan for your area, as well as referring to the NPPF, there are specific policies you may be able to suggest if not already present (see Appendix 2).

b) LOCAL TRANSPORT PLAN

Local highway authorities are required to produce Local Transport Plans (LTPs) to inform highways developments along the following lines of guidance published in 2009:

An LTP should cover all of an authority's policies and delivery plans relating to transport, explaining how these contribute to the wider local agenda. It should consider the transport needs both of people and of freight. It should consider not only possible enhancements to transport services but the maintenance, operation, management and best use of the assets necessary for transport delivery, within the context of tightening environmental constraint.

The strategic element of LTPs may look forward up to 20 years, but the implementation element may be much shorter, up to 3 years, or the highways authority may review both elements together every 5 years.

Government guidance on LTPs is currently being updated for new guidance to be published in 2023, but the 2009 guidance already links LTPs to Government targets for reducing carbon emissions. Government figures show that transport provided the largest share of national emissions in 2021, so we expect new guidance to be strengthened in this area. In the meantime, there are also transport considerations at Section 9 of the NPPF (see Appendix 3).

More information will become available shortly, but it is worth noting that while the department for Transport does not formally assess LTPs, leaving that to local communities, any Government funding for local transport may be linked to Government approval of the LTP.

c) LOCAL MINERALS PLAN

The Government includes coal and other fossil fuel sources in its definition of "minerals". Minerals planning is already linked to the awareness that minerals are a finite resource, and there is considerable guidance about minerals planning on the Gov.uk website (see Appendix 4) as well as at Section 17 of the NPPF (see Appendix 5).

2. NEIGHBOURHOOD DEVELOPMENT PLAN

Neighbourhood Plans are effectively a local extension of a planning authority's Local Plan and are not permitted to contradict anything in the Local Plan – hence the importance to town and parish councils of getting involved in any Local Plan review.

Neighbourhood Plans are a product of the Localism Act 2011, and as well as Government guidance, the Centre for Sustainable Energy has published a useful guide to neighbourhood planning in a climate emergency (see References) including many practical policy examples. The guide has specific sections around:

- Renewable Energy
- Sustainable Buildings
- Sustainable Transport
- Flooding, Extreme Weather and Water Conservation
- Green Infrastructure and Biodiversity
- Transitioning to a Low Carbon Economy, and Service Provision

Another environment and sustainable design policy example is given at Appendix 6. These practical examples are particularly relevant as the Planning Inspectorate does not seem to keep up to date with what wording is permitted in neighbourhood plans, and without examples before them planning inspectors seem to vary in their comments on draft neighbourhood plans.

3. LOCAL PLANNING APPLICATIONS

Thanks are due to Hadleigh Town Council for their published advice (see References):

The Planning Advisory Committee should use the following criteria for assessing planning applications with respect to environmental impact and climate change:

1. Design and materials. The application makes clear that the design aims to minimize energy requirements in the design phase (e.g. it fulfils Passivhaus standards (see section 8)) and also justifies the use of carbon-intensive materials such as steel, brick and cement where these have been included in the design. The general waste reduction principles of 'reduce, reuse and recycle', with use of reclaimed or recycled materials where this is possible should also be apparent in the application.

2. Energy efficiency. The application addresses standards for energy efficiency, for example by specifying a high standard of insulation, with an estimated EPC level of C or above.

3. Renewable energy. Homes should be fitted with a source of renewable energy, such as solar thermal or heat pump heating, or photovoltaics. Applications or homes with fossil fuelled boilers should not be supported.

4. *Accessibility. Sites allocated for new housing are, or are to be made, easily accessible by walking, cycling and public transport links to the town centre and local amenities including schools and sports facilities. Specifying in the application any locations for cycle storage is to be encouraged.*

5. *Green space. The application avoids loss of local nature sites and green spaces and includes plans for their maintenance where relevant (e.g. tree watering). Significant developments should include areas that enhance local nature, through allowing habitats to establish, creating corridors between existing areas of habitat.*

6. *Tree coverage. Where the application includes a new open space, it includes sufficient new native tree coverage and other plant life.*

7. *Low-carbon vehicles. The application supports low-carbon vehicles, for example, with EV charging points easily accessible.*

8. *Lighting. The application specifies where appropriate that LED lights are to be used.*

9. *Resilience to climate impacts. Building should not be built in flood plains nor otherwise contribute to significantly changing surface or sub-surface hydrology, including impacting on other homes and buildings. Buildings should be well-insulated and may contain features such as green roofs, that contribute passively to summer cooling.*

10. *Water saving. The application includes where appropriate water saving measures such as using water butts and toilet flushers that save water) and runoff water in concrete areas.*

Applicants are encouraged to review the guidance in the Net Zero Carbon Toolkit (see section 8). The Net Zero Carbon Toolkit has been adopted and promoted as a guide by Babergh District Council [10].

Threshold

This Planning Advisory Committee may decide not to apply this guidance where it considers an application:

- *to have low or zero environmental impact or carbon emissions, or*
- *to cover a site plot area less than 2000 sq. ft.*

Environmental impact assessments are required for certain types of development. Current Government guidance on these can be found at www.gov.uk/guidance/environmental-impact-assessment (though a consultation is under way in April 2023 on potential changes to the guidance). In summary the guidance says:

The aim of Environmental Impact Assessment is to protect the environment by ensuring that a local planning authority when deciding whether to grant planning permission for a project, which is likely to have significant effects on the environment, does so in the full knowledge of the likely significant effects, and takes this into account in the decision-making process.

Whether or not there is an environmental impact assessment provided by the planning applicants, town and parish councils will be able to review applications by following the Hadleigh approach.

Some parishes include land designated as part of an Area of Outstanding Natural Beauty (AONB). Government guidance advises:

As a local authority, you must make sure that any proposals have regard for the purpose of conserving and enhancing the natural beauty of the AONB, for example when:

- *adding utility services, like gas pipes and telecommunications cables*
- *creating public access as part of rights of way improvement*

You can [consult Natural England](#) where development might have a significant impact.

In practice, the local planning authority decides whether or not something would be a major development (see paragraph 177 of the NPPF at Appendix 7). AONBs are not statutory consultees but may have relevant policies in their own management plans. There have also been proposals recently for large solar arrays on green belt land, which if sufficiently large (over 1,000 square metres) will attract the attention of the Secretary of State, though in such cases Government policy on reducing carbon emissions seems to come into play.

More detailed advice on how to respond to planning applications on any protected area may be found at www.gov.uk/guidance/protected-sites-and-areas-how-to-review-planning-applications . This advice includes a link www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site to the process (that should have been applied) for any plan or development affecting a protected area, a webpage which itself links to a list of protected areas across the UK.

REFERENCES

Grateful thanks are recorded to the following authorities for permission to use material from their publications. The original documents may be accessed online and used as practical examples.

- Frome Town Council, Climate Emergency Planning Guide 2021, accessed 8th April 2023 at www.frometowncouncil.gov.uk/wp-content/uploads/2021/10/Climate-Emergency-Planning-Guide-final-version.pdf
- Centre for Sustainable Energy, Neighbourhood Planning in a Climate Emergency 2020, accessed 8th April 2023 at www.cse.org.uk/downloads/reports-and-publications/policy/planning/renewables/neighbourhood-planning-in-a-climate-emergency-feb-2020.pdf
- Harpenden Town Council, Neighbourhood Plan 2018, accessed 8th April 2023 at www.harpenden.gov.uk/neighbourhood-plan
- Hadleigh Town Council, Climate Change: Planning Application Assessment Guidance 2022, accessed 8th April 2023 at <https://hadleightowncouncil.gov.uk/wp-content/uploads/2022/07/Agenda-Item-10e-Climate-Change-Planning-Application-Assessment-Guidance-26th-June-DRAFT.pdf>

The National Planning Policy Framework may be accessed at www.gov.uk/guidance/national-planning-policy-framework .

APPENDIX 1 – NATIONAL PLANNING POLICY FRAMEWORK (NPPF) S.14

Here for reference is the current Section 14 of the NPPF which deals with climate issues. Revised in 2021, the NPPF is being reviewed again in 2024.

14. Meeting the challenge of climate change, flooding and coastal change

152. The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

Planning for climate change

153. Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures⁵³. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.

154. New development should be planned for in ways that:

- a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and
- b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.

155. To help increase the use and supply of renewable and low carbon energy and heat, plans should:

- a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);
- b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and
- c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers.

156. Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.

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; and
- b) take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

158. When determining planning applications for renewable and low carbon development, local planning authorities should: a) not require applicants to demonstrate the overall need for renewable or low carbon energy, and recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions; and b) approve the application if its impacts are (or can be made) acceptable⁵⁴. Once suitable areas for renewable and low carbon energy have been identified in plans, local planning authorities should expect subsequent applications for commercial scale projects outside these areas to demonstrate that the proposed location meets the criteria used in identifying suitable areas.

Planning and flood risk

159. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.

160. Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.

161. All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property. They should do this, and manage any residual risk, by:

- a) applying the sequential test and then, if necessary, the exception test as set out below;
- b) safeguarding land from development that is required, or likely to be required, for current or future flood management;

- c) using opportunities provided by new development and improvements in green and other infrastructure to reduce the causes and impacts of flooding, (making as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and
- d) where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to relocate development, including housing, to more sustainable locations.

162. The aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.

163. If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3 (*of the NPPF*).

164. The application of the exception test should be informed by a strategic or site-specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. To pass the exception test it should be demonstrated that:

- a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and
- b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

165. Both elements of the exception test should be satisfied for development to be allocated or permitted.

166. Where planning applications come forward on sites allocated in the development plan through the sequential test, applicants need not apply the sequential test again. However, the exception test may need to be reapplied if relevant aspects of the proposal had not been considered when the test was applied at the plan-making stage, or if more recent information about existing or potential flood risk should be taken into account.

167. When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment⁵⁵. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:

- a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;
- b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;
- c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;
- d) any residual risk can be safely managed; and
- e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.

168. Applications for some minor development and changes of use⁵⁶ should not be subject to the sequential or exception tests but should still meet the requirements for site-specific flood risk assessments set out in footnote 55.

169. Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:

- a) take account of advice from the lead local flood authority;
- b) have appropriate proposed minimum operational standards;
- c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and d) where possible, provide multifunctional benefits.

Coastal change

170. In coastal areas, planning policies and decisions should take account of the UK Marine Policy Statement and marine plans. Integrated Coastal Zone Management should be pursued across local authority and land/sea boundaries, to ensure effective alignment of the terrestrial and marine planning regimes.

171. Plans should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast. They should identify as a Coastal Change Management Area any area likely to be affected by physical changes to the coast, and:

- a) be clear as to what development will be appropriate in such areas and in what circumstances; and
- b) make provision for development and infrastructure that needs to be relocated away from Coastal Change Management Areas.

172. Development in a Coastal Change Management Area will be appropriate only where it is demonstrated that:

- a) it will be safe over its planned lifetime and not have an unacceptable impact on coastal change;
- b) the character of the coast including designations is not compromised;
- c) the development provides wider sustainability benefits; and
- d) the development does not hinder the creation and maintenance of a continuous signed and managed route around the coast⁵⁷.

173. Local planning authorities should limit the planned lifetime of development in a Coastal Change Management Area through temporary permission and restoration conditions, where this is necessary to reduce a potentially unacceptable level of future risk to people and the development.

NPPF References:

53 In line with the objectives and provisions of the Climate Change Act 2008.

54 Except for applications for the repowering of existing wind turbines, a proposed wind energy development involving one or more turbines should not be considered acceptable unless it is in an area identified as suitable for wind energy development in the development plan; and, following consultation, it can be demonstrated that the planning impacts identified by the affected local community have been fully addressed and the proposal has their backing.

55 A site-specific flood risk assessment should be provided for all development in Flood Zones 2 and 3. In Flood Zone 1, an assessment should accompany all proposals involving: sites of 1 hectare or more; land which has been identified by the Environment Agency as having critical drainage problems; land identified in a strategic flood risk assessment as being at increased flood risk in future; or land that may be subject to other sources of flooding, where its development would introduce a more vulnerable use.

56 This includes householder development, small non-residential extensions (with a footprint of less than 250m²) and changes of use; except for changes of use to a caravan, camping or chalet site, or to a mobile home or park home site, where the sequential and exception tests should be applied as appropriate.

57 As required by the Marine and Coastal Access Act 2009

APPENDIX 2 – POTENTIAL LOCAL PLAN POLICIES

With grateful acknowledgement to Frome Town Council, Climate Emergency Planning Guide.

BUILDING DESIGN AND RENEWABLE ENERGY

Form, Orientation and Fabric

- *To avoid costly retrofit measures all new homes should be built to the Future Homes Standard 2025 or Passivhaus standard*

Renewable Heat

- *Under no circumstances should new homes be connected to the gas grid; either a low carbon heat network or individual heat pumps should be included as standard.*

Renewable Energy Generation

- *100% of electricity demand for new residential developments to be met on-site.*
- *Developers should make early contact with local community energy groups to explore possibilities for partnership on innovative projects.*

Building Performance Evaluation & User Guidance

- *Developers to work with clients to commission a Building Performance Evaluation for the design, construction and handover stages of development*
- *All new houses to come with an easy user guide to cover heating and ventilation systems and controls, metering and energy generation.*

Building Standards for Non-Residential Development

- *All new non-residential developments to be built as close to net-zero carbon as possible, demonstrating at a minimum a 27% improvement from 2013 Part L regulations.*
- *All new non-residential developments to include low carbon heating and renewable electricity generation as standard*

BUILDING MATERIALS AND RESOURCES

Circular Economy

- *All developments shall demonstrate actions taken to reduce resource use and maximise opportunities for reuse through the provision of a Circular Economy Statement*
- *Developers to refer to a local Green Directory for local, low carbon building materials and resources*

Embodied Carbon and Whole Lifecycle Assessment

- *All developments shall demonstrate actions taken to reduce embodied carbon and for large developments, a Whole Lifecycle Carbon Assessment will be submitted*

ACTIVE AND GREEN TRAVEL

- *Developers to work with the local council and residents to ensure new developments link with the local Walking and Cycling Infrastructure Plan and Transport Strategy*
- *Active travel to be prioritised through clearly marked and separated walking and cycling routes that link up with public transport routes*
- *Secure and weatherproof cycle storage to be incorporated into all developments*
- *Developers to work with local car club providers to incorporate community vehicles into the development from day on*

BIODIVERSITY AND GREEN INFRASTRUCTURE

Biodiversity Net Gain

- *All new developments must demonstrate that they have adhered to the Biodiversity Mitigation Hierarchy and have achieved a >10% net uplift in biodiversity in line with the Environment Act 2021*

Community Food Growing

- *All developments to include allocated space for communal food growing*

Tree Planting

- *New residential streets to be “tree lined” in line with the National Planning Policy Framework, with further trees planted in community orchards and gardens*
- *Developers to liaise with local residents and the local council’s trees officer to identify opportunities for planting projects and maintenance*

APPENDIX 3 – NATIONAL PLANNING POLICY FRAMEWORK (NPPF) S.9

Here for reference is the current Section 9 of the NPPF which deals with transport issues. Revised in 2021, the NPPF is being reviewed again in 2024.

9. Promoting sustainable transport

104. Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) the potential impacts of development on transport networks can be addressed;
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

105. The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.

106. Planning policies should:

- a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities;
- b) be prepared with the active involvement of local highways authorities, other transport infrastructure providers and operators and neighbouring councils, so that strategies and investments for supporting sustainable transport and development patterns are aligned;
- c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;
- d) provide for attractive and well-designed walking and cycling networks with supporting facilities such as secure cycle parking (drawing on Local Cycling and Walking Infrastructure Plans);

- e) provide for any large scale transport facilities that need to be located in the area⁴⁴, and the infrastructure and wider development required to support their operation, expansion and contribution to the wider economy. In doing so they should take into account whether such development is likely to be a nationally significant infrastructure project and any relevant national policy statements; and
- f) recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government’s General Aviation Strategy⁴⁵.

107. If setting local parking standards for residential and non-residential development, policies should take into account:

- a) the accessibility of the development;
- b) the type, mix and use of development;
- c) the availability of and opportunities for public transport;
- d) local car ownership levels; and
- e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

108. Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.

109. Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use. Considering development proposals

110. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users;
- c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code ⁴⁶; and

- d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

111. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

112. Within this context, applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

113. All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

NPPF References:

44 Policies for large scale facilities should, where necessary, be developed through collaboration between strategic policy-making authorities and other relevant bodies. Examples of such facilities include ports, airports, interchanges for rail freight, public transport projects and roadside services. The primary function of roadside services should be to support the safety and welfare of the road user (and most such proposals are unlikely to be nationally significant infrastructure projects).

45 Department for Transport (2015) General Aviation Strategy.

46 Policies and decisions should not make use of or reflect the former Design Bulletin 32, which was withdrawn in 2007.

APPENDIX 4 – GOVERNMENT GUIDANCE ON MINERALS PLANNING

See fuller guidance at www.gov.uk/guidance/minerals .

What are the environmental issues of minerals working that should be addressed by mineral planning authorities?

The principal issues that mineral planning authorities should address, bearing in mind that not all issues will be relevant at every site to the same degree, include:

- [noise associated with the operation](#)
- [dust](#);
- [air quality](#);
- [lighting](#);
- visual impact on the local and wider landscape;
- landscape character;
- [archaeological and heritage features](#) (further guidance can be found under the [Minerals and Historic Environment Forum's Practice Guide on mineral extraction and archaeology](#));
- [traffic](#);
- [risk of contamination to land](#);
- soil resources;
- geological structure;
- impact on [best and most versatile agricultural land](#);
- blast vibration;
- [flood risk](#);
- [land stability](#)/subsidence;
- internationally, nationally or locally designated wildlife sites, protected habitats and species, and ecological networks;
- impacts on nationally protected landscapes (National Parks, the Broads and Areas of Outstanding Natural Beauty);
- nationally protected geological and geo-morphological sites and features;
- [site restoration and aftercare](#);
- surface and, in some cases, ground water issues;
- water abstraction.

APPENDIX 5 – NATIONAL PLANNING POLICY FRAMEWORK (NPPF) S.17

Here for reference is the current Section 17 of the NPPF which deals with minerals issues. Revised in 2021, the NPPF is being reviewed again in 2024.

17. Facilitating the sustainable use of minerals

212. It is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that the country needs. Since minerals are a finite natural resource, and can only be worked where they are found, best use needs to be made of them to secure their long-term conservation.

213. Planning policies should:

- a) provide for the extraction of mineral resources of local and national importance, but not identify new sites or extensions to existing sites for peat extraction;
- b) so far as practicable, take account of the contribution that substitute or secondary and recycled materials and minerals waste would make to the supply of materials, before considering extraction of primary materials, whilst aiming to source minerals supplies indigenously;
- c) safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas⁷⁹; and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that the resources defined will be worked);
- d) set out policies to encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place;
- e) safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material;
- f) set out criteria or requirements to ensure that permitted and proposed operations do not have unacceptable adverse impacts on the natural and historic environment or human health, taking into account the cumulative effects of multiple impacts from individual sites and/or a number of sites in a locality;
- g) when developing noise limits, recognise that some noisy short-term activities, which may otherwise be regarded as unacceptable, are unavoidable to facilitate minerals extraction; and
- h) ensure that worked land is reclaimed at the earliest opportunity, taking account of aviation safety, and that high quality restoration and aftercare of mineral sites takes place.

214. When determining planning applications, great weight should be given to the benefits of mineral extraction, including to the economy⁸⁰. In considering proposals for mineral extraction, minerals planning authorities should:

- a) as far as is practical, provide for the maintenance of landbanks of non-energy minerals from outside National Parks, the Broads, Areas of Outstanding Natural Beauty and World Heritage Sites, scheduled monuments and conservation areas;
- b) ensure that there are no unacceptable adverse impacts on the natural and historic environment, human health or aviation safety, and take into account the cumulative effect of multiple impacts from individual sites and/or from a number of sites in a locality;
- c) ensure that any unavoidable noise, dust and particle emissions and any blasting vibrations are controlled, mitigated or removed at source⁸¹, and establish appropriate noise limits for extraction in proximity to noise sensitive properties;
- d) not grant planning permission for peat extraction from new or extended sites;
- e) provide for restoration and aftercare at the earliest opportunity, to be carried out to high environmental standards, through the application of appropriate conditions. Bonds or other financial guarantees to underpin planning conditions should only be sought in exceptional circumstances;
- f) consider how to meet any demand for the extraction of building stone needed for the repair of heritage assets, taking account of the need to protect designated sites; and
- g) recognise the small-scale nature and impact of building and roofing stone quarries, and the need for a flexible approach to the duration of planning permissions reflecting the intermittent or low rate of working at many sites.

215. Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working. Maintaining supply

216. Minerals planning authorities should plan for a steady and adequate supply of aggregates by:

- a) preparing an annual Local Aggregate Assessment, either individually or jointly, to forecast future demand, based on a rolling average of 10 years' sales data and other relevant local information, and an assessment of all supply options (including marine dredged, secondary and recycled sources);
- b) participating in the operation of an Aggregate Working Party and taking the advice of that party into account when preparing their Local Aggregate Assessment;
- c) making provision for the land-won and other elements of their Local Aggregate Assessment in their mineral plans, taking account of the advice of the Aggregate Working Parties and the National Aggregate Co-ordinating Group as appropriate. Such provision should take the form of specific sites, preferred areas and/or areas of search and locational criteria as appropriate;

- d) taking account of any published National and Sub National Guidelines on future provision which should be used as a guideline when planning for the future demand for and supply of aggregates;
- e) using landbanks of aggregate minerals reserves principally as an indicator of the security of aggregate minerals supply, and to indicate the additional provision that needs to be made for new aggregate extraction and alternative supplies in mineral plans;
- f) maintaining landbanks of at least 7 years for sand and gravel and at least 10 years for crushed rock, whilst ensuring that the capacity of operations to supply a wide range of materials is not compromised⁸²;
- g) ensuring that large landbanks bound up in very few sites do not stifle competition; and
- h) calculating and maintaining separate landbanks for any aggregate materials of a specific type or quality which have a distinct and separate market.

217. Minerals planning authorities should plan for a steady and adequate supply of industrial minerals by:

- a) co-operating with neighbouring and more distant authorities to ensure an adequate provision of industrial minerals to support their likely use in industrial and manufacturing processes;
- b) encouraging safeguarding or stockpiling so that important minerals remain available for use;
- c) maintaining a stock of permitted reserves to support the level of actual and proposed investment required for new or existing plant, and the maintenance and improvement of existing plant and equipment⁸³; and
- d) taking account of the need for provision of brick clay from a number of different sources to enable appropriate blends to be made.

Oil, gas and coal exploration and extraction

218. Minerals planning authorities should:

- a) when planning for on-shore oil and gas development, clearly distinguish between, and plan positively for, the three phases of development (exploration, appraisal and production), whilst ensuring appropriate monitoring and site restoration is provided for;
- b) encourage underground gas and carbon storage and associated infrastructure if local geological circumstances indicate its feasibility;
- c) indicate any areas where coal extraction and the disposal of colliery spoil may be acceptable;
- d) encourage the capture and use of methane from coal mines in active and abandoned coalfield areas; and

- e) provide for coal producers to extract separately, and if necessary stockpile, fireclay so that it remains available for use.

219. When determining planning applications, minerals planning authorities should ensure that the integrity and safety of underground storage facilities are appropriate, taking into account the maintenance of gas pressure, prevention of leakage of gas and the avoidance of pollution.

220. Planning permission should not be granted for the extraction of coal unless:

- a) the proposal is environmentally acceptable, or can be made so by planning conditions or obligations; or
- b) if it is not environmentally acceptable, then it provides national, local or community benefits which clearly outweigh its likely impacts (taking all relevant matters into account, including any residual environmental impacts)

NPPF References:

79 Primarily in two tier areas as stated in Annex 2: Glossary

80 Except in relation to the extraction of coal, where the policy at paragraph 217 of this Framework applies.

81 National planning guidance on minerals sets out how these policies should be implemented.

82 Longer periods may be appropriate to take account of the need to supply a range of types of aggregates, locations of permitted reserves relative to markets, and productive capacity of permitted sites.

83 These reserves should be at least 10 years for individual silica sand sites; at least 15 years for cement primary (chalk and limestone) and secondary (clay and shale) materials to maintain an existing plant, and for silica sand sites where significant new capital is required; and at least 25 years for brick clay, and for cement primary and secondary materials to support a new kiln.

APPENDIX 6 – SAMPLE ENVIRONMENT & SUSTAINABLE DESIGN POLICY

With grateful acknowledgement to Harpenden Town Council, Harpenden Neighbourhood Plan.

ESD1 – Design Strategy

All developments must be visually attractive, designed to a high quality; maintain or enhance the character of the area and support Harpenden as a low carbon place to live and work.

For major developments in the Neighbourhood Plan Area, a Design Brief must be prepared and submitted in support of the planning application. The Design Brief should demonstrate consideration of the following (where applicable) in addition to the requirements of the other policies of this Neighbourhood Plan:

- i. Promotion of sustainable development, sustainable use of resources, green technologies and high levels of energy efficiency in order to minimise the impact on the environment of delivering the development and of the residents or users of the developments thereafter.
- ii. How the development will promote sustainable living for housing developments and sustainable use for non-residential developments.
- iii. Facilities made available for pedestrians and cyclists.
- iv. Location, type and management of open space, leisure and recreation facilities
- v. Protection against the loss of or significant harm to ecological or landscape value or, in the event of loss or significant harm, the provision of appropriate mitigation to address the loss or harm. If the Local Planning Authority deems that appropriate mitigation cannot be achieved, compensatory measures may be acceptable in addition to (not instead of) the maximum achievable mitigation
- vi. A proportionate assessment of views to and from the proposed development and key views of townscape, including how views of landmark and gateway buildings, and important landscape features will be retained or enhanced. Visual impact should be minimised through the design of the site layout, buildings and landscape.
- vii. Materials palette (if it is not possible to indicate exact materials then a broad type should be specified).
- viii. How the development is sensitive to and makes a positive contribution to the local character of the area.
- ix. How permeability of land surface has been maintained and / or enhanced in the development and how the development is using sustainable solutions to reduce flood risk.

- x. How the water efficiency standard for housing, as set out in Policy ESD19, has been applied.
- xi. How best practice measures have been used to avoid pollution to air, water and soil
- xii. Environmental performance. An environmental performance and sustainability statement (demonstrating how environmental issues have been fully considered in the location, site layout, general design, building design and construction and future use of the development) is required. This should be related to advice provided by the Hertfordshire Building Futures Design Toolkit1.

Developments must be implemented in accordance with the principles set out in the Design Brief. Applicants are encouraged to engage with Harpenden Town Council / Rural Parish Council (whichever is applicable) to discuss the contents of the Design Brief

APPENDIX 7 – NATIONAL PLANNING POLICY FRAMEWORK (NPPF) S.15

Here for reference is the current Section 15 of the NPPF which deals with conserving and enhancing the natural environment. Revised in 2021, the NPPF is being reviewed again in 2024.

174. Planning policies and decisions should contribute to and enhance the natural and local environment by:

(a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

(b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

(c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

(d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

(e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

(f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

175. Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework⁵⁸; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

176. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads⁵⁹. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

177. When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development⁶⁰ other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

(a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;

(b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and

(c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

178. Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 176), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.

Habitats and biodiversity

179. To protect and enhance biodiversity and geodiversity, plans should:

(a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity⁶¹; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation⁶²; and

(b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

180. When determining planning applications, local planning authorities should apply the following principles:

(a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

(b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

(c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁶³ and a suitable compensation strategy exists; and

(d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

181. The following should be given the same protection as habitats sites:

(a) potential Special Protection Areas and possible Special Areas of Conservation;

(b) listed or proposed Ramsar sites⁶⁴; and

(c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

182. The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

Ground conditions and pollution

183. Planning policies and decisions should ensure that:

(a) a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination. This includes risks arising from natural hazards or former activities such as mining, and any proposals for mitigation including land remediation (as well as potential impacts on the natural environment arising from that remediation);

(b) after remediation, as a minimum, land should not be capable of being determined as contaminated land under [Part IIA of the Environmental Protection Act 1990](#); and

(c) adequate site investigation information, prepared by a competent person, is available to inform these assessments.

184. Where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.

185. Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

(a) mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life⁶⁵;

(b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason; and

(c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

186. Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual

applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.

187. Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.

188. The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively. Equally, where a planning decision has been made on a particular development, the planning issues should not be revisited through the permitting regimes operated by pollution control authorities.

NPPF References:

58 Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.

59 [English National Parks and the Broads: UK Government Vision and Circular 2010](#) provides further guidance and information about their statutory purposes, management and other matters.

60 For the purposes of [paragraphs 176](#) and [177](#), whether a proposal is 'major development' is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.

61 [Circular 06/2005](#) provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.

62 Where areas that are part of the Nature Recovery Network are identified in plans, it may be appropriate to specify the types of development that may be suitable within them.

63 For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.

64 Potential Special Protection Areas, possible Special Areas of Conservation and proposed Ramsar sites are sites on which Government has initiated public consultation on the scientific case for designation as a Special Protection Area, candidate Special Area of Conservation or Ramsar site.

65 See Explanatory Note to the [Noise Policy Statement for England](#) (Department for Environment, Food & Rural Affairs, 2010).

CLIMATE ACTION FOR SMALLER COUNCILS

Revised Draft Guidance June 2023

Many parish councils have the minimum five councillors together with a part-time parish clerk. These are the intended audience for this guidance, as well as parish meetings that may only gather once a year.

CLIMATE ACTION BACKGROUND

Climate action is often described under three headings:

- Mitigation – reducing the carbon emissions that contribute to global warming.
- Adaptation – responses to the climate changes that are already happening.
- Nature Recovery – including offsetting the impact from past development.

FIRST STEPS - WHAT CAN EVERYONE DO AT ONCE?

- Forge links with any initiatives by your local planning authority as well as any voluntary sector networks in your county.
- Contact neighbouring parishes to discover what action they are taking that you might support in some way.
- Contact existing local climate action groups, offering support in terms of publicity and meeting space if not actual funding.

COMMENTING ON PLANNING APPLICATIONS

Whether or not a council leads on climate action, it can ask telling questions when presented with local planning applications (see Appendix 1).

Local councils can also get involved with consultation on their planning authority's Local Plan, to help encourage the inclusion of policies that would support such critical comment of planning applications from developers.

Local councils can of course develop their own neighbourhood plans, and the Centre for Sustainable Energy has published guidance¹ on potential policies to include.

ASSESSING OUR OWN COUNCIL ACTION

Some things may be done by way of leading by example:

- Review the council's own property (there may not be any of course), landholding and operations to see if carbon emissions could be reduced.

- Consider how nature recovery might be supported on green spaces we control, bearing in mind the duty to consider biodiversity in our actions that is reconfirmed for all local councils under the Environment Act 2021 and to which recent Government guidance² is asking for a considered local response by the end of 2023.

South Gloucestershire Council has published useful guidance³ on developing a nature recovery action plan.

WORKING WITH OUR LOCAL COMMUNITY

Smaller councils cannot be expected to do it all on their own:

- Open a dialogue with the wider community, either through the annual parish meeting and/or other channels including social media and the council's own website, to identify and encourage local support for climate action.
- Note which local issues have already been identified that could have a project-based response that supports climate action in some degree, such as public buildings facing high energy costs that might host solar panels.
- While reviewing your local council area, consider which of the wide range of common climate action projects (see an emerging list at Appendix 2) might provide long-term benefit to your local community.
- Set up a working group with representatives from the local community to assess the practicalities of a local action plan and seek the necessary funding.

Declaring a climate emergency is also something a local council can do (see Appendix 3), but that commitment is hollow without some action on the ground.

CONTEXT – POLICY

Apart from the biodiversity duty, the only clearly related statutory responsibility for local councils is to seek to create new allotments in response to local demand⁴. By encouraging local food production allotments can help reduce the amount of carbon emissions from distribution by supermarkets as well as providing allotment holders with healthy eating and healthy exercise!

Other powers exist to allow parish councils to take a range of actions if they so choose (see Appendix 4). This includes the power under the 1972 Local Government Act to support district, county, unitary and borough authorities in their own statutory duties⁵.

Overall, it is not necessary for councils to declare a climate emergency before commencing climate action. Further guidance is available on how to incorporate environmental concerns within a council's regular activity⁶.

CONTEXT – RESOURCES

There will clearly be an upper limit to what parish clerks can achieve on their own in addition to their regular work, and councillors will also have other work or family commitments.

This being the case, all councils will need to work with their local community, including the business community, rather than trying to do it all on their own. There may also be the opportunity to collaborate with neighbouring councils, even to the point of developing joint climate action projects.

BUILDING A LOCAL ACTION PLAN

Here are some early steps:

- **Prepare the ground at your council** then put forward a motion to declare an emergency or pledge to net zero – don't worry too much about the wording, the pledge for action is the thing.
- **Focus on the action plan:**
 - Keep it simple.
 - Don't take on too much yourselves - use the work which is already going on in your community.
 - Start with where you are, you can build on your plan later.
 - It needs only to be an umbrella to gather under and as an aide memoire of what was promised and why.
 - Write your action plan for your community so that everyone can understand and relate to it.
- **Joint community/working groups** work well – harness the community resource and use the council to guide, advise and fund.

Declaring a biodiversity crisis as well as a climate crisis helps to draw out those with specific interest in wildlife – but any declaration is worth nothing without an action plan behind it, in fact it is only a gateway to identify and encourage action.

There are many draft action plans on the internet. NALC's summary of possible topics may be a helpful start⁷. You can cherry pick what looks attractive to you from this list and from other sources, then add further items later.

There's a very simple quick example from a small Derbyshire parish council at Appendix 5. Whichever one hits the spot for you – it's your action plan!

What we know is that councillors and parish clerks are already busy and there is not an infinite amount of resource available to construct and fulfil an action plan. It can seem quite daunting and a lot of work, but it doesn't need to be.

Remember that it's not the plan that matters, it's the action. Any action on the ground, however small or trivial, is better than an elaborate plan on paper which doesn't translate into your parish's activities. Don't sweat the bureaucracy, put something simple together and get going! You can refine your plan later once you get into the swing of things.

If all you have going on in your community is enthusiasm for a village orchard and some thoughts about a repair café – start there. Your plan doesn't have to be comprehensive and include every climate action activity possible. Once you get going you will find that the list grows by itself.

Another key point is that most people who stand for council are not website searchers, project managers or blue-sky thinkers. They won't go looking for answers and they will recognise what they know. So, keeping things very simple and easy to relate to works well. Your council will understand tree planting, roof insulation and wildflowers in the verges. They might not relate so well to key performance indicators, risk registers and progress meetings. Still, every action plan is different, reflecting the community it is for, so whatever works for you is best.

It's helpful if there is one person involved who can keep the show on the road behind the scenes, updating the plans and prompting people to get things done, but for the most part the action plan works well if it is a focused part of the community's day to day activities.

For example, one small council's (population 1,109) first action plan ran to 23 pages. It had contributions from all the village climate groups' leaders, with a three-year plan, funding requirements and key targets as well as links to outside groups. Nobody read it. A short two-page large font summary was prepared for an event, to pin up on a noticeboard; it attracted so much attention that it has been used as the basis for the action plan-based climate work ever since.

It may be helpful to put a standing item on the council agenda to discuss progress on climate action, even when there isn't any, and publish any activity on the local noticeboard and website. Keeping the action plan in the public eye is important.

FINDING THE RESOURCE

Current thinking to solve the problem of resource is to set up working groups comprising community members and parish councils. In one small parish council, a community/council group was set up to solve the problem of river flooding. On investigation it turned out that the village could yield:

- Someone working for the local wildlife trust.
- A planning lecturer
- An expert in aggregates from the local quarry
- Two residents who had made their own flood defences and could take the other residents along with them.
- A willing council member.
- And the two flood wardens, one of whom turned out to be a structural engineer.

These residents, who are mostly not involved with the council at all, were found via a process of word of mouth and a WhatsApp group inviting interest. The project is now well under way and has achieved things not within the reach of individuals. Not only does that project mitigate the impact of flooding, but it is introducing a visible, climate action promoting wildlife corridor along the riverbank, and reconnecting a flood plain which will absorb carbon. There are reports back to council monthly, but the work is all being done by the group, with the council providing some small funding where required (the larger funding is being found by the group itself).

Another example is a self-start tree planting group, which has planted over 2.5 km of trees in 2022/23. The local parish council heard about it and offered support. It helps it to buy equipment and find land to plant on. The current focus is on working with National Trust to plant trees where ash dieback is already creating bare hillsides, with the council able to bring some authority to negotiation with the Trust.

Another small council has negotiated with its district council to manage verges so that wildflowers can grow; the district council has changed its mowing schedule and posted Bee Kind notices and a group of residents do the sowing and maintenance. The verges look spectacular and there is a measurable increase in insects and small wildlife spotted. Council input was about two hours, talking to the district council and then to a resident who is a horticulturalist; the rest did itself.

Elsewhere community/council groups are looking at installing electric vehicle charging points for residents, debunking myths and providing information on what you need to know to move into the electric vehicle market.

FORGING THE PEOPLE LINKS

Several individuals and organisations can help:

- **The Parish Clerk.** The role of the parish clerk cannot be underestimated; parish clerks tend to know everyone in a small community and can put one group in touch with another with very little effort. Without getting involved in community/council groups, they can identify the people who could usefully be involved and put them in touch with each other. So for relatively little effort they can have a big impact on the opportunities for climate action.
- **Schools and parents.** Climate change action can be fun. Getting the local school involved (which will already have its own climate projects) provides parent power resource as well as an easy way to involve the community.
- **Individual volunteers in your community.** As with the examples above, your parish may contain all kinds of people with specialist knowledge that are prepared to get involved. As well as through your usual media channels and by contacting existing green and climate groups, you could make climate action a feature of your annual parish meeting.
- **Your district council.** Most district councils have declared a climate emergency. If yours have then they can support you in lots of ways. They may have a climate officer in which case, get in touch and have a chat about what their priorities are and how they match up to yours.

FURTHER ADVICE AND INFORMATION

There are a huge number of agencies and organisations offering help and advice on climate issues:

- **Wildlife Trusts.** The national network of Wildlife Trusts, patron HM the King, <https://www.wildlifetrusts.org/> which run broadly on a county basis, is an immeasurably useful mine of support, funding, expertise and encouragement. Get in touch via their website and tell them what you are planning.
- **Local climate groups.** There is likely to be a climate action group nearby; Hope Valley Climate Action is a good example of one of these and their website has information which translates across the country – see more at <https://hopevalleyclimateaction.org.uk/>. Organisations such as this, which are run by locals for the locality, can offer things like temporary bank accounts to manage funding (which you can tell your community groups about), as well as day to day information about trees and insulation and so forth.

- **Other weblinks** – work is under way to develop a central source making links to existing advice easy, meanwhile many links are already posted at www.thecommunityworks.co.uk/local-councils/ .

MEASURING AND MONITORING

Once an action plan is under way, it will be important to monitor the progress of individual projects and publicise successes locally. This will not only keep people informed but potentially encourage more people to join in.

If one of your plan's aims is to reduce carbon emissions (and perhaps support the biosphere if you have included that in your declaration) then you will need to measure how successful you have been so far.

Measuring carbon feels a bit daunting, but there are many easy-to-use carbon measurement tools such as at <https://footprint.wwf.org.uk/> which shows you how much carbon you use as an individual and as a community. It's very quick to operate and very eye-opening. Try it on your councillors and see how they compare to your community's average, and how your community measures up to the national average, and the world average.

LOCAL MESSAGES

Reducing carbon emissions is closely linked to individual decisions. The key message to share is that we all use an amount of carbon in our lives, and to reach net zero (i.e. not making global warming any worse) we ALL have to reduce our carbon use to nothing. Just recycling your plastic straws won't do it.

If people aren't reaching net zero as an individual, they need to do more. Airline flights, transport, heating and food are the bigger hitters. We can each use less carbon by flying much less, eating beef and lamb only occasionally (livestock produce the powerful greenhouse gas methane), driving an electric vehicle and insulating our homes. And we can each work to take carbon out of the atmosphere by getting involved in tree and hedge planting in our gardens and communities, wildlifing and wildflowering gardens and verges, switching to renewable energy and contacting our MPs to support climate legislation.

That's the message for all councils to get across; that it can be done, and we can still avoid the worst repercussions of climate change if we all step up and get involved.

REFERENCES

1. www.cse.org.uk/resource/neighbourhood-planning-in-a-climate-emergency/
2. www.gov.uk/guidance/complying-with-the-biodiversity-duty
3. www.beta.southglos.gov.uk/wp-content/uploads/Local-Nature-Action-Plans-guidance-for-town-and-parish-councils.pdf
4. www.thecommunityworks.co.uk/wp-content/uploads/2023/03/Creating-New-Allotments-March-2023.pdf
5. www.legislation.gov.uk/ukpga/1972/70/section/101
6. www.slcc.co.uk/new-environmental-planning-guidance-available/
7. www.nalc.gov.uk/our-work/climate-change

APPENDIX 1 – QUESTIONS TO ASK OF PLANNING APPLICATIONS

1. Does the proposed design aim to minimize energy requirements?
2. Does the application justify any use of carbon-intensive materials such as steel, brick and cement?
3. Are the general waste reduction principles of 'reduce, reuse and recycle', with use of reclaimed or recycled materials apparent in the application?
4. Does the application address standards for energy efficiency, for example by specifying a high standard of insulation for new homes, with an estimated energy performance certificate (EPC) level of C or above?
5. Are new homes to be fitted with a source of renewable energy, such as solar thermal or heat pump heating, or photovoltaics? (Applications for homes with fossil fuelled boilers should not be supported).
6. Are sites allocated for new housing easily accessible by walking, cycling and public transport links to the town centre and local amenities including schools and sports facilities (and does the application specify locations for cycle storage)?
7. Does the application avoid loss of local nature sites and green spaces and includes plans for their maintenance where relevant (such as tree watering)? (Significant developments should include areas that enhance local nature, through allowing habitats to establish and creating corridors between existing areas of habitat).
8. Where the application includes a new open space, does it include sufficient new native tree coverage and other plant life?
9. Does the application support low-carbon vehicles, for example, with electric vehicle charging points easily accessible?
10. Does the application specify that LED lights are to be used?
11. Does the application propose building on a flood plain or would otherwise significantly change surface or sub-surface hydrology, including impacting on other homes and buildings?
12. Does the application include where appropriate water saving measures such as using water butts, toilet flushers that save water and runoff water in concrete areas?

APPENDIX 2 – SOME CLIMATE ACTION PROJECT OPTIONS

These may be led by local councils on their own or delivered in partnership with other local councils and the local community, including local businesses.

TRAVEL

- Installing electric vehicle charging points.
- Car sharing scheme
- Encouraging active travel
- Expanding the network of bicycle lanes and footpaths
- Supporting homeworking by providing wi-fi enabled spaces and warm spaces.

ENERGY

- Switching to a sustainable energy supplier
- Generating sustainable energy, either by building or a larger scheme
- Energy efficiency (e.g. insulation)

BIODIVERSITY

- Tree and shrub planting
- Rewilding/wildlife friendly planning (from verges to larger areas)
- Working with local landowners to manage land for wildlife.
- Cutting the use of pesticides

FOOD DISTRIBUTION / REDUCING WASTE

- Create new allotments / community orchard.
- 'Buy local' campaign.
- Local produce markets
- Community fridge

INCREASING LOCAL RESILIENCE

- Skills and training (e.g. training people in the community to do retrofits / energy efficient measures)

APPENDIX 3 – DECLARING A CLIMATE EMERGENCY

It is straightforward to declare a Climate Emergency. It's not a formal process and it doesn't get registered anywhere, so you can do pretty much say what you like, so long as it is agreed by the council and minuted. If you are a clerk, get one of your councillors to put forward a motion at a full council meeting.

Here's a possible form of words:

[YOUR COUNCIL} is declaring a CLIMATE EMERGENCY [and a BIODIVERSITY EMERGENCY] acknowledging that humanity is currently in a state of climate [and biodiversity] crisis.

Most current declarations were made when the idea first came up around 2019, and more recently councils are declaring that they will achieve net zero (i.e. minimal carbon emissions) by 2030 or 2050. It depends on the sort of council you are which works best for you. Very small councils with no buildings, playgrounds, cemeteries, development etc may find it harder to measure the carbon involved and find a broader declaration more meaningful.

Before you get to the point of putting forward a motion it's worth making sure you have enough support on your council. Lobby a few of the forward-thinking councillors beforehand to make sure you get the vote through. It will be difficult to return to it in short order so it's worth doing the initial work beforehand.

APPENDIX 4 - LOCAL COUNCILS' POWERS & OPPORTUNITIES AROUND CLIMATE CHANGE

There is a certain amount local councils can do themselves. Beyond that they can still support action by other people at other levels of society and government by encouraging or campaigning.

STATUTE	GENERAL	MITIGATION	ADAPTATION	NATURE RECOVERY
<p>Allotments and markets: (Small Holdings and Allotments Act 1908, ss 23, 26 and 42; Food Act 1984, s. 50)</p>	<p>This allows the promotion of local produce and healthy eating</p>	<p>This can help to reduce food-miles</p>	<p>Allotments powers also enable the provision of communal food-growing sites and initiatives, run by associations and cooperatives.</p>	
<p>Burials etc: (Open Spaces Act 1906, ss 9 & 10; Local Government Act 1972, s.214; Parish Councils & Burial Authorities (Miscellaneous Provisions) Act 1970 s.1)</p>	<p>This can allow practices such as green burials, eco-friendly management etc</p>			
<p>Commons, ponds, open spaces, recreation etc (Open Spaces Act 1906, s.15; Highways Act 1980, ss 47)</p>	<p>Scope to practise good environmental management, accommodate recycling facilities etc on the council's land</p>	<p>Scope to plant trees on, and maintain, highway verges (and ask for tree preservation orders on all existing mature trees)</p>		<p>Scope to plant trees on, and maintain, highway verges (and ask for tree preservation orders on all existing mature trees)</p>

STATUTE	GENERAL	MITIGATION	ADAPTATION	NATURE RECOVERY
Community centres and other public buildings (Local Government (Miscellaneous Provisions) Act 1970, s.19. (Local Government Act 1972, s. 133))	Work towards being carbon-neutral by reducing the council's carbon emissions and using renewable energy sources	Scope to embrace/ include on-site green energy, energy-conservation, electric car charging-points, recycling points etc		
Community energy (s20 of the Climate Change and Sustainable Energy Act 2006)	<i>The 's 137 expenditure limit' is a severe constraint on making capital investments in energy schemes</i>	Councils can encourage or promote the local production and use of renewable energy, and also energy conservation, subject to the section 137 of the LG Act 1972 annual spending limit	<i>Restrictions currently on the ability to 'sell' the energy directly to local consumers.</i>	
Highways and sustainable transport (Highways Act, ss 43, 50, Parish Councils Act 1957, s.1; Local Government Rating Act, 1997, s.25, 28 & 29; Transport Act, 1985, s.106A)	Scope to promote rights of way routes, walking and cycling	Scope to use 'car park' powers, to provide useful facilities such as on-site electric vehicle-charging points and cycle racks	Scope to make more use of powers to support community bus services, and to run or support car- sharing	

STATUTE	GENERAL	MITIGATION	ADAPTATION	NATURE RECOVERY
Litter and environmental crime (Litter Act 1983, ss 5.6, Cleaner Neighbourhoods and Environment Act, 2005)	Scope to provide refuse and waste receptacles and publicity, including recycling.	Scope to discourage and prosecute littering and dumping.	<i>Currently there is no specific power to promote or run waste-recycling or resource re-use activities.</i>	
Neighbourhood planning (Localism Act, 2011; Neighbourhood Planning Act, 2017 and National Planning Policy Framework,)	There is a continuing need to ensure that Neighbourhood Plans have ‘teeth’, and that they can be more than just land-use allocation policies	Scope to include environmentally friendly planning policies re design, routes, landscaping etc.	Encourage climate-friendly activities such as repair cafes, food banks, and recycling	
Newsletters and websites: (Local Government Act 1972, s.142)	Scope to use to promote good environmental practices, resource-sharing etc.			
Community support and engagement (Local Government Act 1972 ss. 111, 140 etc)	Scope to encourage and support volunteers and the wider community with grants, loans, insurance protection, publicity, surveys, good-practice advice etc	Run a yearly schools’ competition for ideas to make the town carbon neutral, establish a forum including businesses, local organisations and residents to develop such ideas	Adopt a “Refill” scheme, making it easier to reuse and refill plastic bottles with free tap water in the town.	Hold open meetings for residents on how to increase biodiversity in their garden, encourage pollination corridors by use of “bee squares”

STATUTE	GENERAL	MITIGATION	ADAPTATION	NATURE RECOVERY
<p>General powers (Local Government Act 1972, s 137; Localism Act 2011, ss 1–8)</p>	<p><i>S 137 annual spending level is limited, and the General Power of Competence is exercisable by relatively few councils</i></p>	<p>Scope to spend money and/or undertake work on a wide range of beneficial activities which are not prescribed in other legislation</p>	<p>Scope to spend money and/or undertake work on a wide range of beneficial activities which are not prescribed in other legislation</p>	<p>Scope to spend money and/or undertake work on a wide range of beneficial activities which are not prescribed in other legislation</p>
<p>Subsidiary powers (Local Government Act 1972, s111):</p>	<p>A very useful enabling power, for a council to do anything (that are not constrained by other legislation) which is calculated to facilitate or is conducive or incidental to the discharge of any of its functions</p>			
<p>Permitted development rights (Town and Country Planning (General Permitted Development) (England) Order 2015, part 12)</p>	<p>Councils may erect and operate, without the need to seek planning permission, a wide variety of small buildings, equipment and other structures on their land, for the purposes of any of their functions or public services.</p>			<p>This can include a range of small ‘green’ developments.</p>

STATUTE	GENERAL	MITIGATION	ADAPTATION	NATURE RECOVERY
<p>Power to comment on planning applications as statutory consultee <i>(Town & Country Planning Act 1990?)</i></p>	<p>Most planning applications in the parish or town will be sent by the planning authority for comment</p>	<p>Ask that any new building is well insulated and produces as much of its own energy as possible</p>	<p>Caution around any development on low-lying land due to flood risk, and encourage tree and food planting on site</p>	<p>Object to any proposal for development on green field land on the basis of no community benefit – such land is required for food production</p>
<p>Power to work with higher level councils <i>(Local Government Act 1972, ss. 101 & 136)</i></p>	<p>Section 136 could help with expenditure on a wider range of activities but perhaps more important is to explore Section 101 in detail with districts/ boroughs/ county councils to look at delegated or shared services.</p>			
<p>Power to acquire land <i>(Local Government Act 1972, ss 124, 126 & 127)</i></p>	<p>Gives Parish Councils the power to acquire by agreement, to appropriate (to dispose of) land – there is no restriction on the use of that land.</p>			

STATUTE	GENERAL	MITIGATION	ADAPTATION	NATURE RECOVERY
Car sharing schemes <i>(Local Government and Rating Act 1997 s.26)</i>	Gives Parishes the power to establish and maintain a car sharing scheme that benefits the council's area or to assist others in doing so. Now that could be limited to electric cars!			
Improve local biodiversity <i>(Public Health Act 1936 s.260)</i>				Gives the power to maintain or improve ditches and ponds – or pay others to do so. Ponds can be important for local biodiversity.
Maintain and enhance biodiversity (Natural Environment and Rural Communities Act 2006 s.40, confirmed by the Environment Act 2021; Environment (Wales) Act 2016 s.6)				Gives a duty to have regard, so far as is consistent with the proper exercise of a council's functions, to the purpose of conserving biodiversity

APPENDIX 5 – SAMPLE ACTION PLAN FROM A SMALLER COUNCIL

Each of the listed actions in this Derbyshire parish has one or named project leaders.

Emergency	Project	Action	Benefits
Climate	20s Plenty	20's Plenty stickers and joining the local area-wide movement	Reducing carbon pollution by 28%; reducing noise pollution and increasing safety
	Travelling Light Sustainable Travel	Support for a major initiative to encourage bike travel, car sharing and electric vehicles	Reducing carbon and encouraging healthy lifestyles, reducing traffic noise and congestion
	Homeworking	Providing wi-fi enabled warm spaces which are welcoming to homeworkers	Less travel to work
	Shop Local	Supporting our local community shop	Fewer food miles, organic and local food supply
	Electric Vehicle Charging Points	Providing advice on buying and keeping electric vehicle charging points in the village	Fewer particulates in the air, less traffic noise
	Church/shop green heating project	Solar panels on the church roof, working to provide new green heating in church. Solar panels for bridge lights	Making the most of the church's south facing roof for solar. Blazing a trail for green energy heating in churches
	Retro-insulation of homes	Advice on loft and wall insulation, air source heat pumps, solar panels	Heat leak detector for loan to residents Advice Funding Examples

Emergency	Project	Action	Benefits
Biodiversity	Tree planting	Planting trees and hedges throughout the parish	Carbon reduction, encouraging insects and birds
	Wildflowering verges	No mow May, and sowing wildflowers	Encouraging insects and birds
	Wildlifing gardens	Possibility of secret wildlife gardens in the village	Encouraging residents to think about wildlifing their gardens
	Bats	Preserving our church bats during reroofing	More bats, or certainly not fewer bats
	Herbicides	Work with the local planning authority to find alternatives to glyphosate	Protecting wildlife and people. Where can you use it? Where not?
General	Leaflets	Topical information on environment issues in the parish newsletter	Electric vehicle cars, insulating your home, changing to sustainable energy - all made easy