The countryside charity

Climate emergency: time for planning to get on the case

What is needed to enable local plans to take real action on reducing carbon emissions?

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Executive summary

This paper investigates what local plans can and should do to tackle the climate emergency, and looks at how recently-adopted plans are shaping up. Our findings are based on CPRE, the countryside charity's research into all local plans adopted since the government introduced the national, legally-binding 2050 target for net-zero carbon.

CPRE has looked at the 24 local plans outside Greater London, which have been adopted since the government introduced its net-zero 2050 target. On average, these local authorities need to reduce per capita CO2 emissions by around 9% every year in order to meet their net-zero commitments. Yet only one of those local plans – the Plymouth & South-West Devon Joint Plan - actually adopts a quantified, strategic-level carbon reduction target.

Around 85% of England's local authorities have now declared climate emergencies and made political commitments to tackle them. The majority are setting net-zero carbon targets of 2030, well ahead of the UK government's legally binding 2050 target and just eight years from now. Achieving these ambitions is a monumental challenge, to which every single development decision must contribute.

Despite a national policy requirement that local plans should help to achieve 'radical reductions' in emissions, there is very little evidence of radical measures. None of the plans we studied tackles the tensions between economic growth, car dependence and emissions, or shows that different spatial options for development and transport have been considered, and the lowest carbon option chosen.

Crucially, Planning Inspectors are not prioritising climate considerations or demanding that plans itemise and quantify how they will achieve net-zero. This is in sharp contrast to how local plans are explicitly required to itemise and quantify how they will meet housing needs. This is illustrated by inspector's' reports produced before plans are adopted: across these for the 24 adopted plans there is on average only one mention of climate for 24 mentions of housing. Both objectives are important, but there is a stark difference in emphasis.

National planning policy is well behind the curve in terms of enabling local plans to get to grips with greenhouse gas emissions. Therefore, CPRE recommends that central government amends the National Planning Policy Framework (NPPF) to clearly stipulate the scope of local plans on this issue.

In particular, local plans need to be able to should require that:

- All new developments demonstrate a measurable reduction in net carbon emissions over the life of the development;
- All transport interventions demonstrate how they will deliver a reduction in private car mileage;
- Any above-baseline targets to boost the amount of housing and employment development must also be justified on the basis of the additional carbon reductions they will deliver; and
- All local plans should contain a robust strategy for delivering the council's net-zero carbon target integrated across the plan as a whole, and this should be an additional test of soundness at examination.
- Decision-makers need policies that empower them to refuse planning applications that do not contribute to these requirements.

Planning's weakness on climate action in numbers

0: The number of local plan inspector's reports that have demanded substantive modifications to ensure they achieve radical reductions in greenhouse gas emissions.

0: Planning policy requirements that enable housing, commercial or transport proposals to be refused on grounds of the greenhouse emissions they will lead to.

1: Only 1 out of 24 local plans adopted since 2019 has a quantified, strategic policy to achieve the council's net-zero carbon target.

8: The number of years remaining for most councils to hit their locally-set net-zero target – the majority are aiming for 2030.

9: The average percentage carbon reduction councils need to achieve across their area every year to hit their net-zero target.

15: The period of years that most local plans plan for – plans adopted now work up to around 2037.

23: Local plans found sound by inspectors since 2019 despite an absence of strategic, quantified carbon reduction targets.

24: Local plan inspector's reports have 24 mentions of housing for every 1 mention of climate.

Introduction

30 years ago, in the run-up to the 1992 Rio Earth Summit, CPRE published a paper with Green Alliance[1]. Amongst our recommendations back then, we asked the government to 'secure energy efficiency in the design and layout of settlements and transport patterns'. Since then, CPRE's local groups across the country have pressed time and again for development plans in their area to do just that. Now, CPRE has studied recently-adopted local plans, and found that the planning system has made far too little progress. The time to remedy this is right now. Otherwise, the planning system will continue to miss crucial opportunities to tackle the climate emergency.

There are three mechanisms to get to net-zero carbon, and we need to use all three in combination: reduce the emissions produced by homes, businesses and transport; replace fossil fuel energy supply with clean, renewable sources; and draw carbon back from the atmosphere into our soils and water through measures like hedgerow and woodland planting, peat restoration and changes to farming techniques. As we know, the clock is ticking, so every piece of land and every development and investment decision has a role to play. Every time a development goes ahead that does not actively reduce carbon emissions is a missed opportunity. Yet still it happens.

The climate emergency is the most pressing challenge of our times. Around 85% of England's local authorities have now declared climate emergencies and made political commitments to tackle them. Interestingly, the majority are setting net-zero carbon targets of 2030, well ahead of the UK government's legally binding 2050 target. In other words, there's a fair chance that the place you live in is aiming to hit net-zero not in 28 years but in just eight years.

However, to look at most local plans, you would not know there was an emergency at all. CPRE has looked at the 24 local plans outside Greater London[2] which have been adopted since the government introduced its net-zero 2050 target. On average, these authorities need to reduce per capita CO2 emissions by around 9% every year in order to meet their net-zero commitments. Yet only one of those local plans actually adopts a quantified, strategic-level carbon reduction target.

Built environment professionals increasingly want to rise to the challenge. UK architects are making climate declarations[3] and the Royal Town Planning Institute (RTPI) is campaigning for the government to give planners the resources they need to plan for climate action[4].

In this paper, CPRE looks at what planners can and should be doing to address net zero, and considers some of the barriers that need removing to help them do so.

[1] CPRE & Green Alliance (1992) Putting our Own House in Order: the UK's Responsibilities to the Earth Summit
[2] Strategic planning in Greater London sits within the London Plan 2021 https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf
[3] UK Architects declare Climate & Nature Emergency: www.architectsdeclare.com
[4] RTPI: 'Resource Planners for Climate Change', www.rtpi.org.uk

Our research findings on recently-adopted local plans

CPRE has looked at the 24 local plans adopted since the legally binding national net-zero 2050 target took effect, to find examples of the kinds of policies that are being included, and whether planning inspectors are intervening to address climate action. Our findings are set out below.

Two of the plans, Fylde and North West Leicestershire, were only partially reviewed, and climate change was not within the themes that were reviewed, so we have not included them in our analysis.

The best plan so far: Plymouth & South Devon Joint Plan

This is the only recently-adopted plan that contains a quantified, strategic carbon reduction target to support the council's 2030 net-zero commitment. The council also won an RTPI Award for Planning Excellence, for its innovative use of the Community Infrastructure Levy with a climate emergency bonus to help fund local environmental projects. Whilst there are a number of aspects we would have liked to see improved, CPRE believes this is to be the best example so far of an adopted local plan getting to grips with climate action. The carbon target was added to the local plan during the public examination at the council's initiative, with technical evidence to justify it, but not because the Inspector required it. We noted that there were no representations about carbon reduction from other participants in the examination – reinforcing our concern about the lack of climate advocates in the process.

Signs of improvement: Lancaster City Council

Lancaster adopted a plan in July 2020 which was already too far advanced to reflect the council's declared climate emergency, and lacked a carbon reduction strategy. To remedy this the council embarked on a climate emergency review of the plan in summer 2021. This is an example that we hope other authorities will follow, and offers a sign that the next round of local plans we see adopted in 2022 and beyond will deal with climate issues better than their predecessors.

Crucially, the emerging plan includes a whole new policy (CC1) on responding to climate change, which CPRE welcomes and considers to be good practice. However, the review should really go much further in considering how land is used in the future. For example:

- Its economic objective changes from 'growth' to 'prosperity' and includes an objective for green jobs, but it should acknowledge that economic priorities must fundamentally change to genuinely enable decarbonisation.

- Linked to high economic growth aspirations are high housing targets, and the review could have included looking again at the housing figures and housing land supply position against the latest data which indicates significantly lower housing growth should be needed.

- Modal shift to more sustainable transport is encouraged, but this falls short of the policy to secure the rapid reduction in car use that CPRE considers necessary.

- There are improvements to the policy detail for the Heysham Gateway proposals, referencing low carbon and green energy sectors, but Heysham Gateway is a major road-based development that will inevitably induce additional road traffic. Focusing future investment on integrated, multi-modal approaches would much better support climate action.

The rest: some good policies, but many missed opportunities

Bedford Borough Council

Policy 51S of Bedford's plan is titled 'Climate Change Strategic Approach' but this merely states that 'the council will require the development and use of land and buildings to address climate change' with no quantification and no reference to the role of the location of development. It is worrying that such a generalised statement of intent can be deemed by an Inspector to amount to meeting national policy and complying with climate legislation.

Bolsover District Council

Climate change is a strategic objective of the plan, but no quantified target is provided and there is no strategic policy to reduce greenhouse gas emissions. Bolsover's spatial strategy features three strategic site allocations, and the development expectations for each are set out in masterplans. Climate is included as a consideration within each masterplan, but none of the sites is well-connected to public transport. The Inspector did make some textual modifications relating to climate, but nothing which materially changed how the local plan did, or didn't, address the climate emergency.

Central Bedfordshire Council

The local plan sets a requirement for new development to exceed Building Regulations performance on both carbon reduction and water efficiency; and policy CC2 takes a well-balanced approach to renewable energy. The plan references the council's Environmental Framework, though this isn't part of the development plan and therefore lacks statutory teeth. The environmental chapter (policy EE4) also recognises that woodlands, trees and hedgerows are at risk from climate change. The Inspector's report sets out several modifications to improve these thematic policies, but these are only to ensure conformity with the wording of national policy. The Inspector does not pick up on the lack of a strategic approach to climate, especially regarding the location of development.

Chelmsford City Council

Chelmsford's local plan has a strategic policy which says 'in addressing the move to a lower carbon future', which hardly reflects the scale or urgency of the council's political commitment to have a zero-carbon future within 8 years. Yet the Inspector found this to be sound and legally compliant. The council has begun work on a Climate & Ecological Emergency Action Plan but there is no clear relationship between this and the local plan.

Cheltenham Borough Council

The plan refers to the Gloucestershire Nature Map, which gives spatial expression to the county's potential for restoration and creation of Priority Habitats and 'embodies a 50-year vision which will allow biodiversity to adapt to climate change'. The plan also makes much clearer use of Local Green Space Designations than most other plans we've seen. But although addressing the challenge of climate change features within the plan's vision, there is no strategic policy to reduce carbon emissions. The Inspector's Report made no interventions on climate.

County Durham

The plan has thematic climate change policies in relation to expectations for new development, water and flood risk and the Durham Heritage Coast. It also recognises the climate relevance of enhancing biodiversity, geodiversity, trees and landscapes in the supporting text. There is no strategic policy for implementing the county's net zero target, and the Inspector saw no problem with this omission.

Dartmoor National Park Authority

Mitigating and adapting to climate change feature in the opening strategic policy (Policy 1.2), the design policy (1.5) explicitly includes a hierarchy of measures for reducing the climate impact of buildings. Connections to climate action run through all the strategic policies, which is very encouraging. Carbon reduction targets are applied to new buildings, but there is no strategy-wide carbon target. This perhaps highlights a conundrum that, in protected landscapes, the much smaller rate and scale of development offers the Local Plan less opportunity to effect climate action through the developments it permits.

Doncaster Metropolitan Borough Council

The Doncaster plan, which CPRE criticised heavily for its lack of ambition to pursue the council's 2040 net-zero target, nevertheless has some strengths: the plan's urban design policy contains the firm language that schemes 'must be designed and assessed to ensure' carbon reduction. Doncaster is also rare in having a good policy for soils. But there remains a fundamental weakness: an economic strategy pivoting almost entirely around motorway-based employment sites and the continued growth of the airport. And it has adopted a housing requirement 57% higher than its baseline need to support its economic ambitions without any commensurate ambition to kickstart climate action. The examination Inspector did not acknowledge this problem.

Harrogate Borough Council

Harrogate's plan has a chapter on climate change and recognises the role of efficient, resilient development in reducing both the extent and the impacts of climate change. The policies within the chapter cover flood risk and rivers, low carbon energy, and a sustainable design policy by which all developments are required to reduce CO2 emissions. However, there is no recognition of the importance of the location of development in reducing transport-related emissions. The Inspector was satisfied with this, though policy CC2 on rivers was modified for clarity.

Hart Borough Council

Response to climate change is identified as a key issue for the plan, and is included as a design consideration for new development, but does appear in high-level strategic policies. The spatial strategy includes a new 'sustainable settlement' of 1,500 homes, but there is no indication of how its location or infrastructure will be configured to ensure it contributes to the council's net-zero target. The Planning Inspector removed from the plan a much larger new settlement of 5,000 homes, and he referred to climate change as one several considerations where the proposal had not been adequately tested.

Isles of Scilly

The council's net-zero commitment for 2030, and also the need for resilience to climate change in such a sensitive place, feature strongly in the strategic aims of the plan, but the policies themselves are nowhere near strong enough. Policy SS1 – Principles of Sustainable Development – expects development to 'make a positive contribution' to reducing carbon footprint and to 'take into account' the implications of climate change. But experience tells us that developers can easily tick those boxes without producing real change, principally because no measurement of the scale or rate of change is required by the policy. The Inspector did require some text modifications relating to the coastal and flooding aspects of climate resilience.

Lake District National Park

The local plan provides a clear explanation of how climate change is being addressed through a range of aspects of the plan. It states (Policy 06) that it wants all new development to be resilient to climate change and to reduce carbon emissions. It also notes the plan's 'key role in reducing carbon emissions' and references the Low Carbon Lake District Initiative's target to reduce carbon emissions by 1% year-on-year. Although the plan does not actually commit new development to implementing this target, this is nevertheless a good practice example of a local plan being integrated with local climate ambitions.

Mansfield District Council

The plan identifies key issues and opportunities (table 2.1) which include provision of renewable energy, locating development in the most sustainable locations, and recognising the role of trees, hedgerows and woodland in climate response. But it is difficult to see how these translate into policies, although the Climate Change chapter does have a policy for new development (P5). In this instance the Inspector did intervene, because Policy CC1 had identified suitable areas for wind energy without using the most up-to-date landscape character evidence.

North-East Derbyshire District Council

When this plan went to Public Examination in 2018, CPRE argued that the lack of a strategic carbon reduction target or associated indicators means the Local Plan cannot show how the net effect of the policies in the Plan will help address the climate emergency. Disappointingly, although Derbyshire County Council has produced a Climate Change Strategy, this is not referenced in the adopted Local Plan, the Plan still has no targets or indicators with which to monitor progress on carbon. The Inspector

neither acknowledged the points raised by CPRE in the Examination, nor required any climate-related modifications to the Plan.

North Essex Joint Plan

Three councils - Braintree, Colchester & Tendring – have adopted a joint strategic plan. All three have declared a climate emergency, but too late in the plan process to affect it, and there is no strategic carbon target set. A key feature of this plan is a new 'garden community' – an urban extension of up to 9,000 homes on the border of Tendring and Colchester. This gained a Housing Infrastructure Fund grant of £99m for a dual carriageway and a potential rapid transit system, but there is a risk that the dual carriageway costs will increase and funds will be diverted to it from the transit scheme. Therefore, despite claims to the contrary, this looks set to be car-dependent, just like the schemes that the Transport for New Homes report 'Garden Towns – Vision and Reality' identified as offering a promise of sustainability which is never fulfilled.

The examination Inspector found shortcomings in how the sustainability of the proposal had been assessed, but was later satisfied by an additional study without requiring any additional justifications on climate grounds, and with no baselines or modelling for air quality or water quality. Campaigners in North Essex submitted an alternative proposal during the local plan process, which would harness the under-used Colchester-Clacton rail route as a rapid transit network, but this did not find favour with the local authorities.

Northumberland National Park and North York Moors National Park

Both plans referred to the government's Vision for National Parks which identifies their role for 'leading the way in adapting to, and mitigating, climate change', and in North York Moors' case the examination Inspector strengthened the strategic policy to 'requiring' action rather than merely 'supporting' it. But neither plan commits to achieving quantified carbon reductions.

Oxford City Council

Oxford is currently running a Citizens' Assembly to develop its Climate Change Action Plan, which may result in its net-zero date being brought forward. The local plan states that 'addressing climate change is one of the core land use planning principles' and the supporting text for Policy RE1 'Sustainable design and construction' covers carbon reduction, sustainable retrofitting and water efficiency. The policy also contains quantified carbon reduction targets for both residential and non-residential developments, and the Inspector required modifications to these targets to make them more specific. Policies for green and blue infrastructure are strong. However, there is no reference to the role of development location and its implications for travel patterns.

Runnymede Borough Council

Runnymede has chosen not to declare a climate emergency. Its spatial strategy is heavily influenced by a new settlement at Longcross Garden Village which is already partially under construction. Although the policies for this contain a number of positive messages about active travel, sustainable construction and

green infrastructure, there is no explicit requirement for it to deliver on a carbon budget, and the plan as a whole does not have a strategic carbon reduction objective. The Inspector was satisfied that the plan was sound from a climate perspective.

South Kesteven District Council

The opening policy of the plan (policy SD1) sets clear and specific expectation that development should minimise impact on climate change. This does follow through into policy SB1 (Sustainable Building), though this policy's approach to low-carbon travel is limited to requiring electric vehicle charging points in new developments. There is a detailed set of policies on renewable energy with criteria for landscape impact considerations and impact on agricultural land. The Inspector required a modification to supporting text on green infrastructure, which incorporates climate resilience and adaptation. But there is no quantified expectation of progress on carbon reduction, and the Inspector did not baulk at this.

South Oxfordshire District Council

The local plan's approach to climate was strengthened during the examination at the behest of councillors, because the council had declared its climate emergency with a 2030 target after the draft plan was submitted. The result was a new policy (DES10) setting out the expectations for new development on low carbon and renewable energy, though there is still no clear, strategic target in the plan to reduce carbon emissions. The Inspector accepted these modifications, but did not address matters raised by campaigners about other policies in the plan they argued were inconsistent with the climate emergency. For example, the plan's target of 23,500 new homes comes without any commitment to reduce their embodied carbon, meaning that those new homes and associated infrastructure could almost use up South Oxfordshire's entire carbon budget.

The challenge: planners can and should work towards net zero

This paper is based on CPRE's research looking at all local plans adopted since the government introduced the national, legally-binding 2050 target for net-zero carbon. At present, most adopted local plans deal with climate action in a combination of three ways:

1. Exercising their power to go beyond Building Regulations requirements for the energy performance of new buildings – some do this, though the majority don't;

2. Setting development management policies for renewable energy developments – most are now doing this;

3. Establishing policies to mitigate increased flood risk and pressure on water resources – understandably, approaches to these issues vary according to how they play out locally.

CPRE's research shows that what seems to be missing is a strategic approach to reducing greenhouse gas emissions. CPRE believes that a more strategic approach would be achieved through the following policies:

Brownfield first – a recent US study[5] found that, in California at least, the biggest impact of local policies comes from urban infill – consistent with the 'brownfield first' approach that CPRE advocates in England. We have found that 1.2 million homes could be accommodated on currently achievable brownfield sites across England[6], which would not only recycle the land but also provide that crucial urban infill contribution to climate action.

Development location – a recent report for the RTPI[7] calculated the potential of land-use planning interventions to address net-zero in the transport sector. It found that if all new development were located and designed to actively reduce carbon emissions, this would cancel out the baseline increases in emissions by 2030 that will otherwise result from a 'do nothing' situation. New development is happening right now that is causing increases in emissions, which means the impact is still heading in the wrong direction.

Reduce car use – the RTPI report also found that a 14% reduction in nationwide transport emissions needs to be achieved by substituting car trips for other modes – walking, cycling and public transport. That must happen as well as the transition to electric vehicles, which is why we have to plan for significant reductions in car journeys.

Carbon life-cycle of development – a negative footprint requirement for new development would also reduce the carbon emissions from housing and industrial sectors, not just from transport, and can include restorative measures such as tree and hedgerow planting alongside on-site renewables, energy

[5] Carbon Footprint Planning Tools and Scenarios: https://coolclimate.org/scenarios
[6] CPRE (2021) Recycling our land: state of brownfield 2021 Nov-2021_CPRE_Recycling-our-land_brownfields-report.pdf
[7] RTPI (2021) Net Zero Transport: The role of spatial planning and place-based solutions https://www.rtpi.org.uk/media/9233/rtpi-net-zero-transport-january-2021.pdf

efficiency and recycling the embodied carbon in previously-developed land and buildings. All of this would produce real benefits for people, nature and local environmental quality, not just for carbon.

We can therefore say that, at the very least, the planning system needs to set out two specific, quantified targets for actions that are within its scope to implement:

- All new development to demonstrate a measurable reduction in net carbon emissions;
- All transport interventions to demonstrate a measurable reduction in private car mileage.

National planning policy falls short of what is needed

The National Planning Policy Framework (NPPF) requires planning authorities to set out strategic policies for the pattern, scale and quality of places. This is done through development plans, which can be made by an individual local authority or by groups of authorities in a joint plan.

These strategic policies cover housing, commercial development, transport and other infrastructure, community facilities, and the environment and natural resources. National policy also requires the planning system to 'shape places in ways that contribute to radical reductions in greenhouse gas emissions'. Plans should look at least 15 years ahead, so any authority with a local net-zero target sooner than 2036 need strategic policies that will carry them all the way to that target. There is a legal duty too: the Climate Change Act 2008 amended planning legislation to require that local plan policy contributes to climate action, and this was updated in 2019 when the government committed to net-zero carbon by 2050.

The NPPF goes on to set the expectations of what local plans can and should do about greenhouse gas reduction but, in several ways, it falls short of what is needed.

NPPF Para 35 explains the 'tests of soundness' of a local plan. The lack of explicit reference to climate in the current tests of soundness means that climate is often not given much attention when plans are examined. Our research suggests that a local plan need only contain a reference to the Climate Change Act and the national net-zero 2050 target for it to be found legally compliant, with very little depth of investigation as to how the plan will actually play its part in delivering that target. Further, if a council has set a local net-zero target sooner than 2050, it must follow that the local plan also work towards the local target – but this is not happening.

Part of the assessment of a plan's soundness is the testing of 'reasonable alternatives'. Often, these alternatives are presented as trade-offs: should the plan provide for more development but put greater pressure on the environment, or tend towards conserving the environment at the risk of constraining development? But this must be a false choice, because housing and climate are both important. Meeting housing need in a way which fails to fully address the climate emergency is not sustainable development. What's more, councils often plan for more housing than is required to meet their needs, to attract employment growth. How can this be justified if it does not also reduce the area's carbon footprint? If a local plan wishes to plan for additional housing or employment growth, it should quantify the additional climate action this will deliver.

NPPF Para 82 calls for an economic strategy which encourages sustainable economic growth. Again, if the area's economy needs to get to net-zero carbon within the lifetime of the plan, it follows that all new economic development happening over the plan period must show how it will actively reduce the area's carbon emissions. But the policy is not strong enough to enforce this, and consequently economic growth is still, in practice, being prioritised over climate action, instead of win-win outcomes being required.

NPPF Para 105 requires that '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'. Time and again, we see land being allocated for new development that might be able to secure some public transport improvements in the future, but is principally dependent on roads. A recent report by Transport for New Homes[8] found several cases of new settlements being planned expressly to finance a new or upgraded road. And local plans have contained objectives to 'reduce the need to travel' by car for decades, but traffic levels have still risen. We know for sure that total car mileage per driver needs to reduce by anywhere between 10% and 60% if the national net-zero target is to be met[9], and there is ever-growing evidence that this can only be achieved by re-designing road space to prioritise buses, walkers and cyclists (taking that space away from cars) and by enabling the key destinations of home, work, school and shops to be closer together. 15- or 20-minute neighbourhood concepts[10] offer huge potential, not just for climate but for health and wellbeing too, and have happened successfully in other countries. Whilst these may not provide a universal solution, reducing total car travel is a long overdue planning policy requirement that any change to NPPF must urgently embrace.

NPPF was recently revised (para 129) to raise the design expectations of new development through the National Model Design Code, which should be used to guide planning decisions unless local authorities have produced local equivalents. Raising standards is welcome, but the code only contains two general references to net-zero carbon targets, and does nothing to address the fact that the biggest influence on a development's carbon footprint is its location and how you travel there.

Of course, there is not only a climate emergency but a nature emergency too, and the UK is one of the most ecologically depleted countries in the world. Government policy is now addressing this through the long-awaited Environment Act 2021 which provides for nature recovery networks and sets quantified requirements for developments to achieve 'biodiversity net gain'. In principle this is to be supported – the idea of putting back more than you take away is a big step forward compared to merely 'minimising harm' – though it is fraught with concerns about how the losses and gains are measured. The concept of net-zero carbon raises similar concerns, though we know that the target is impossible to meet without huge emission reductions, so action to secure those reductions is what really matters. Restoration of peat, woodland, street trees, grassland, hedgerows and soils are all essential too. But since NPPF (para 174) now explicitly requires planning policies and decisions to provide net gains for biodiversity, why does it not also require policies and decisions to demonstrate their net carbon impact?

[8] Transport for New Homes (2020) Garden Villages and Garden Towns: Visions and Reality https://www.transportfornewhomes.org.uk/wp-content/uploads/2020/06/garden-village-visions.pdf
[9] British Medical Journal (2021) 375 Martineau T et al, Changing Behaviour for net zero 2050 www.bmj.com/content/375/bmj.n2293
[10] TCPA (2021) 20-minute Neighbourhoods – creating healthier, active, prosperous communities www.tcpa.org.uk/the-20-minute-neighbourhood

Most local plans contain policies on renewable energy, which can be generated on-site within housing and commercial developments and also in standalone locations such as wind or solar farms. NPPF (para 155) rightly sets a positive tone for renewable energy schemes, but what is conspicuously missing is an 'if not, why not?' requirement for all new development to maximise its renewable energy provision. The number of huge warehouses still being built without solar roofs is nothing short of scandalous. Meanwhile, farmland is being used for solar energy, leading to concerns about landscape impact and loss of agricultural productivity. The planning system needs to deliver a systematic approach to fitting solar power to existing buildings, new buildings and on the sites with lowest impact. No such approach exists at present, and as a result the UK is one of the most expensive places to install rooftop solar energy[11]. There is also a startling loophole in NPPF (para 217) allowing coal mines to be justified even if they are environmentally unacceptable.

Considering that housing, industry and transport are strategic priorities for planning and the three key sectors that generate most of our carbon emissions, it follows that local plans must specify how the pattern, scale and quality of development in each of those three sectors will contribute – measurably – to year-on-year reductions in greenhouse gas emissions. There's no logical way out of this: they have to do it. If they don't then their local plans can't possibly be fulfilling national policy, so when they are examined by a government-appointed Planning Inspector, they will be rejected as unsound; and local politicians won't adopt their local plans.

Except that isn't what's happening. Out of all the local plans adopted since an authority has set a local net-zero target, only one plan actually commits to implementing that target; and none of them clearly articulates how employment, housing and transport developments will each make a measurable contribution. In most instances, Planning Inspectors are not requiring significant modifications to rectify the problem. How can this be?

Analysis: what's going wrong and how local authorities can do more

Let us consider the possible reasons why local plans are not rising to the climate challenge. One explanation is that planning officers think that their authorities' net-zero targets are not practically achievable. But it is the local politicians who vote to adopt the plan, so why would they vote for something which doesn't fulfil their own commitments? In any case, substantial technical evidence has been produced already to show the specific measures that could enable them to reach the target.

A second explanation is the excuse that the local plan will only have a marginal effect on greenhouse gas emissions. This is a classic 'What about China?' argument. It's true that 80% of the housing stock we'll have in 2050 already exists, so retrofitting existing homes is crucially important, and some local authorities have shown real initiative in this. But if you permit homes now which are not zero-carbon in themselves and are in car-dependent locations, your place-shaping policies are doing precious little to achieve radical reductions in emissions. Instead, you're building in a further retrofitting burden for the

[11] Joshi S, Glynn J, Mittal S (2021): Solar panels on half the world's roofs could meet its entire electricity demand, The Conversation 11 October 2021 https://theconversation.com/solar-panels-on-half-the-worlds-roofs-could-meet-its-entire-electricity-demand-new-research-169302?

future – a future in which you have already missed your net-zero target. The RTPI and other bodies have produced plenty of evidence of what planning can and should be doing, as we have described earlier.

A third explanation is that local authorities are competing with each other to attract housing and employment development, which they need to meet their growth targets, and they can't afford to set higher standards than their neighbours for fear of driving developers away. Yet in most cases, their neighbouring authorities are also setting ambitious carbon reduction targets, so surely, they could agree with each other to ratchet up the requirements they place on investors and developers across a wide geographical area? This is called strategic planning, and there is nothing stopping authorities from doing it.

This seems to leave only one plausible explanation for why local plans are being so weak on such an important issue. The government currently imposes no penalty on a local authority for not planning to actively reduce carbon emissions. The only penalties are related to housing: the Housing Delivery Tests dictate that if either housebuilding is below target, or if the council can't show it has 5 years' worth of housing land supply available, then the local plan loses control over what is built where. The result is often poorer quality developments in greenfield, car-dependent locations, leading to even more carbon emissions. This is perplexing when you consider that the Climate Change Act makes reducing carbon emissions a legal obligation, whereas building housing – whilst an important policy – carries no such legal duty. Furthermore, key incentives to increase housebuilding, including the New Homes Bonus and the Housing Infrastructure Fund are not contingent on carbon reduction being demonstrated.

At the public examination of a plan, the Planning Inspector is subjected to two powerful forces. The biggest of these is national planning policy, which is very detailed and specific about how an authority must plan to fully meet its quantified housing requirement, but sets only generalised, subjective requirements on climate action. Coming a close second are the land agents promoting the housing and employment sites they wish to see developed; in most instances, developing these sites will serve to increase, not reduce, carbon emissions and car dependence. When a draft plan goes to examination, there are few firm policy requirements for climate, and even fewer climate advocates at the table.

Our study of recently-adopted plans shows how little attention climate action is receiving from Inspectors during the public examination process. Even a simple word search shows that there is only one reference to climate for every 24 mentions of housing. This is a stark reflection of the shortfall in what is expected of the examination process where climate is concerned. CPRE and others have argued at several public examinations that plans do not comply with the law, because their lack of detail and strategic commitment to carbon reduction falls short of their duties under the Climate Act 2008. Yet Inspectors appear satisfied that if a plan merely contains policies which refer to climate – such as promoting renewable energy and sustainable transport – this is enough to meet the legal requirement, even if they provide no assurances that any progress will be made on carbon emissions.

Conclusions and recommendations

Some local plans are being pro-active in implementing their council's targets for net-zero carbon, and this is good news. Most recently-adopted plans include policies for low carbon and renewable energy, and the majority of them are recognising the need for sensitivity to landscape impacts of energy development – an issue which Planning Inspectors also appear to be alert to.

We have found examples of best practice. Plymouth & South Devon is the only adopted plan that makes a direct, strategic-level policy commitment to delivering net-zero, though Lancaster is intending to follow suit and we know of other councils whose emerging plans also share this ambition.

Several other plans stop short of a high-level target but do show real intent to address the climate challenge. Cheltenham is getting serious biodiversity and green space; Mansfield recognises the importance of trees, hedgerows and woodland; and several plans including the Lake District, Oxford City and South Kesteven require new developments to minimise their climate impact. However, these are not accompanied by monitorable, quantified targets, in sharp contrast to housing delivery.

But there is bad news too. None of the plans we studied comprehensively tackles the tensions between economic growth, car dependence and emissions. And none of the plans has shown that different spatial options for economic and housing development and transport have been considered and the lowest carbon option chosen.

It does not appear that Planning Inspectors are ready to find local plans unsound if they do not itemise and quantify how they will achieve net-zero. This is in sharp contrast to how local plans must itemise and quantify how they will meet housing needs. Both objectives are important, but there is a stark difference in emphasis.

National planning policy is well behind the curve in terms of enabling local plans to get to grips with greenhouse gas emissions. Therefore, CPRE recommends that central government amends the National Planning Policy Framework (NPPF) so local plans require that:

- All new developments demonstrate a measurable reduction in net carbon emissions over the life of the development;
- All transport interventions demonstrate how they will deliver a reduction in private car mileage;
- Any above-baseline targets to boost the amount of housing and employment development must also be justified on the basis of the additional carbon reductions they will deliver;
- All local plans should contain a robust strategy for delivering the council's net-zero carbon target integrated across the plan as a whole, and this should be an additional test of soundness at examination.
- Decision-makers need policies that empower them to refuse planning applications which do not contribute to these requirements. We also need the government to provide local authorities with more powers and resources for retrofitting existing buildings and infrastructure to enable de-carbonisation.

Until these provisions are in place, the planning system will continue to miss crucial opportunities to tackle the climate emergency, emissions will not fall, and time for action.