



RHONDDA CYNON TAF COUNTY BOROUGH COUNCIL

CLIMATE CHANGE CABINET STEERING GROUP

19TH OCTOBER 2020

STRATEGIC AND LOCAL DEVELOPMENT PLANS - THEIR POLICIES AND COMMITMENTS TO ENSURING HOUSING, TRANSPORTATION AND BUSINESS INFRASTRUCTURE MINIMISES THE CARBON FOOTPRINT

REPORT OF THE DIRECTOR OF PROSPERITY AND DEVELOPMENT

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1. PURPOSE OF THE REPORT

- 1.1 The purpose of the report is to firstly set out what the Strategic Development Plan (SDP) and the Revised Local Development Plan (LDP), are required to address with regards to policies and commitments to minimise our Carbon Footprint.
- 1.2 Secondly, the report will set out the opportunities that will present themselves during the preparation and formulation of these plans, (particularly from an LDP perspective), to expand upon these standard requirements from an RCT perspective.

2. RECOMMENDATIONS

It is recommended that the Climate Change Cabinet Steering Group:

- 2.1 Comment on the issues raised in this report, and in particular the discussion points set out in paragraphs 6.9 to 6.15
- 2.2 That the feedback and comments of the Steering Group are reported to Cabinet for their consideration.

3 REASONS FOR RECOMMENDATIONS

- 3.1 The considerations in the report are those that need to be developed further as part of the Climate Change responsibilities and aspirations of Rhondda Cynon Taf, whilst they also need to be incorporated into the statutory revision process for the Revised LDP .

4. BACKGROUND

- 4.1 Rhondda Cynon Taf agreed on the 27th of November 2019 to progress with the preparation of a Revised LDP for the County Borough. This is to be further agreed by Welsh Government (WG), to formally begin the 3.5 year preparation process to its adoption at the end of 2023. Due to the coronavirus pandemic, it was not possible to begin the preparation of the Revised LDP in June as agreed, with an alternative starting date currently being considered. As an authority, we have also agreed on 31st July 2019, to be part of the preparation, the governance arrangements and contribute financially to the Cardiff Capital Region SDP. To date, 8 of the 10 authorities in the region have also agreed to this.
- 4.2 If an SDP is not forthcoming in the shorter term, then the LDP will be required to take on board more strategic consideration of climate change and its associated planning policy. If the SDP is forthcoming, then they will be included in either as appropriate. Accordingly, this paper will continue, unless stated otherwise, on a basis of what is required within an LDP and then what we as an authority can propose to have included within our LDP.

5. What is required in an LDP in relation to Climate Change and its Carbon Footprint

- 5.1 There is a significant amount of policy and legislative requirements within the planning system, and in particular the preparation of statutory Plans (SDP's/LDP'S), by both the Welsh and UK Governments in relation to Climate Change and our Carbon Footprint, the main elements of which are discussed below.
- 5.2 Legislation
- 5.3 In June 2019, the Committee on Climate Change (CCC) requested that the Welsh, Scottish and UK Government reassess the UK's long-term emissions targets following the publication of its paper *Net Zero – the UK's Contribution to Global Warming* in May 2019. In response, Wales accepted the CCC's recommendation for a 95% reduction in greenhouse gas emissions by 2050 and committed to go further with an ambition to reach 'net zero' by 2050. Given that all countries of the UK supported this, the Climate Change Act 2008 introduced an associated target amendment order in June 2019.
- 5.4 The Environment (Wales) Act 2016 also required Welsh Government (WG) to set new interim emission reduction targets by the end of 2018. Such interim targets relate to 2020, 2030 and 2040 and should be published c. two years prior to the interim date. WG are committed to reducing emissions by 40% by 2020 (below 1990 levels) however this target was also set out in their Climate Change Strategy (2010).

- 5.5 WG have been committed to cutting emissions and transitioning to a low carbon economy for a number of years and in March 2019, published *Prosperity for All: A Low Carbon Wales*. The publication seeks to maximise wider benefits for Wales, ensuring a fairer, healthier and more equal society. The plan *pulls together 76 existing pieces of policy from across the Welsh Government, UK Government and the EU where decarbonisation is integrated either as a direct outcome or a wider benefit*. Some are new policy, such as the Renewable Energy Targets and improved policy in *Planning Policy Wales (Ed. 10)*, where decarbonisation is a central pillar.
- 5.6 The ambitions also stem from the Well-being of Future Generations (Wales) Act's seven well-being goals and five ways of working. The strategy also highlights the role the National Development Framework (which is the development plan prepared by WG for all of Wales) needs to play in driving sustainable growth and combating climate change by guiding strategic development over the next 20 years.
- 5.7 National Development Framework
- 5.8 The Draft National Development Framework (NDF), released in August 2019, also has tackling the causes and mitigating the effects of climate change as a key consideration. Climate change is specifically mentioned in the NDF section on '*Challenges and Opportunities*'. The plan acknowledges that climate change and the decline of biodiversity are global challenges that are the biggest issues faced by Wales. It states that *Addressing this is our greatest responsibility when considering the legacy we will leave for future generations and as a consequence we have declared a Climate Emergency* (Welsh Government, 2019, p15).
- 5.9 The NDF commits to decarbonising Wales, delivering healthy, resilient eco-systems, encouraging sustainable energy generation, responsible water resource management, contributing the success of the circular economy, seeking the production of zero carbon homes and encouraging sustainable travel.
- 5.10 Any replacement LDP will need to reflect these targets in its vision, strategy, objectives and policies. This will be achieved by developing robust evidence in order to ensure that it can contribute to tackling climate change in a meaningful way. It will need to be ensured however that any prospective allocations are viable and deliverable, with any proposed new requirements for low or zero carbon homes and contributions to CIL/S106.

5.11 Planning Policy Wales

- 5.12 Planning Policy Wales (PPW) (Edition 10, December 2018) is then the key overarching planning policy document in Wales, giving policy for decision making at a national level, whilst also indicating what policy principles should be cascaded down into LDP, local level policy. PPW 10 advocates making the best use of resources, which is one of its 'key planning principles'. The policy recognises that the planning system has a vital role to play in making development resilient to climate change, decarbonising society and developing the circular economy for the benefit of both the built and natural environment and to contribute to the well-being goals.
- 5.13 PPW encourages that the 'proximity principle' is applied to ensure that problems are solved locally and are not passed on to other places or future generations. It has a focus on strategic placemaking, using a spatial strategy to locate development to promote sustainable development. This includes minimising the need to travel through the location of housing, services and employment. Additionally, PPW10 has introduced the Sustainable Transport Hierarchy, which Welsh Government require must be used to determine applications and when preparing an LDP. It prioritises walking, cycling and public transport ahead of private motor vehicles, though it does recognise that electric vehicles also play an important role in sustainable transport.
- 5.14 Additionally, it promotes more sustainable travel choices, network management and demand management in order to increase physical activity, improve health and help to tackle the causes of climate change and airborne pollution. Paragraph 5.3 'Transportation Infrastructure' states that the planning system should facilitate the delivery, decarbonisation and improvement of transport infrastructure in a way that reduces travel and the use of private vehicles. At 5.3.6 planning authorities must promote and facilitate the provision and decarbonisation of high quality public transport infrastructure.
- 5.15 Section 5.7 also seeks to ensure that all new development mitigates the causes of climate change in accordance with the energy hierarchy for planning. *Reducing energy demand and increasing energy efficiency, through the location and design of new development, will assist in meeting energy demand with renewable and low carbon sources. This is particularly important in supporting the electrification of energy use, such as the growing use of electric vehicles (p89).*
- 5.16 Paragraph 5.8 'Renewable and Low Carbon Energy' sets out that planning authorities should facilitate all forms of renewable and low carbon energy development. In doing so, planning authorities should seek to ensure their area's full potential for renewable and low carbon energy generation is maximised and renewable energy targets are

achieved. This would include the re-powering, Life Extension, Decommissioning and Remediation of the infrastructure.

- 5.17 Paragraph 4.1.39 encourages the use of Ultra Low Emission Vehicles (ULEVs), and the support of the provision of ULEV charging points as part of new development. Where car parking is provided for new non-residential development, planning authorities should seek a minimum of 10% of car parking spaces to have ULEV charging points. Paragraph 4.1.42 Planning authorities should take a strategic approach to ULEV charging in their area and, where appropriate, develop policies in their development plan and specify local requirements.
- 5.18 The Council will need to take account of these and other policies expressed throughout Planning Policy Wales and ensure that it is translated (without repetition) down to the local level where appropriate.

6. Revising the Rhondda Cynon Taf LDP

6.1 Revised LDP Preparation

6.2 The current RCT LDP (2011-2021) seeks to contain development within settlements and to identify appropriate new urban growth sites where required. Policies aim to reduce the need to travel by providing sites for employment and services as well as housing and promoting regeneration in sustainable locations. Planning policy also seeks to ensure high standards of amenity in all new developments as well as promoting active travel. This minimises damaging land-use change, which could affect carbon storage in soils, vegetation and trees.

6.3 Whilst climate change is not a 'new' challenge, the way in which it is tackled does put many authorities into 'unchartered waters'. Whilst legislation, policy and guidance in Wales and all over the UK is heavily focused on tackling the causes of climate change, in reality, there are very few proposed solutions. As such, Rhondda Cynon Taf will need to be creative in responding to the challenges of climate change whilst still bringing forth viable development.

6.4 The preparation of the Revised LDP over the next 3 years will be just that – a revision of the current Plan. This will identify the necessary growth of development up to 2030. However, all elements of the Plan will need to be fully re-evaluated through the official preparatory stages from Visioning (including the identification of aims and objectives), Preferred Strategy and then the Deposit (Draft) Plan. Each of these stages will need to ensure that the progressive and current climate change legislation and associated planning policy, as discussed above, are appropriately addressed

- 6.5 It is through these preparatory stages that all stakeholders can propose how we take forward the Climate Change and Carbon Neutral associated aims and proposals, beyond the current planning policy standard requirements. The vision, aims and objectives of the plan may influence an amended LDP Preferred Strategy in the first instance, with more emphasis on the climate change agenda, more so than perhaps existing sustainable development growth.
- 6.6 Policies can then be prepared and formulated that give local distinctiveness and aspirations to Climate Change, albeit ensuring that they are led by clear evidence for need and realistic deliverability. Similarly, the identification of suitable sites for allocation for the necessary land uses e.g. housing, employment, retail, leisure etc follow nationally prescribed and our own bespoke standards. This is in relation to the amount, type and in particular, their location.
- 6.7 A series of groups will be involved in the preparation of the Revised LDP, including community councils, community groups, the public, key consultees such as NRW, Cadw, Coal Authority etc, private developers and commercial bodies amongst others.
- 6.8 All Elected Members will be given their opportunity to have a say on the LDP at various stages, and we are currently in the process of creating a specific RCT Members Forum through the Overview and Scrutiny Committee, to make a formal contribution to the preparation stages of the Plan. It may be appropriate that members from this group propose to sit on this Forum, or otherwise ensure close consultation between the two. The group itself can contribute at various stages as appropriate through consultation events and stages.
- 6.9 **Considerations for the LDP for the Climate Change Group to Contribute To**
- 6.10 Throughout the forthcoming early preparatory stages of the Revised LDP, there are a number of areas/topics that can be researched further with regards to their relationship with Climate Change and Carbon Reduction; and ultimately considered for inclusion within it. Some questions that the group could consider further at this point include:
- What percentage of car parking spaces should have charging points in new non-residential developments?
 - Should there be a similar policy for new residential developments?
 - Should all new homes in RCT be built as zero carbon?
 - What is the role of RCTs uplands in combating Climate Change
 - What is the group's view on the density of development around Metro nodes and car free policies on new development?

6.11 *What percentage of car parking spaces should have charging points in new non-residential developments?*

National policy suggests a requirement for new non-residential development to seek a minimum of 10% of car parking spaces to have ULEV (electric) charging points. There is nothing to prevent the Council from being more ambitious in this area and formulating higher standards. However, it should be emphasised that any policies proposed will need to be based on robust evidence and will need to be measurable in terms of implementation/success and be commercially deliverable.

6.12 *Should there be a similar policy for new residential developments?*

Why shouldn't all new homes be provided with at least one dedicated outdoor, weather proof electric vehicle charging point? Cost is one issue that needs further investigation as the viability of house building in some parts of RCT is already marginal but that's not to say the starting position in the LDP is to seek to achieve such a policy. Consideration needs to be given to whether any technicalities are specified in the policy given that technologies can change rapidly over time. Consideration also needs to be given to the level of charging points in communal parking spaces.

6.13 *Should all new homes in RCT be built as zero carbon?*

Although building control standards are currently being considered by Welsh Government, there may be further opportunity to seek that new homes are built towards zero carbon or at least a performance above the current building regulations. It is important to consider what should the definition of zero carbon be in the LDP insofar as it relates to new homes?

- Does it apply only to 'regulated energy' - those fixed and integral services and fittings in the home such as the space heating, hot water, ventilation and lighting - or also to 'unregulated energy' including things a developer can't as easily control such as those used through plug-in appliances and cooking?
- Does it relate to just a home's day-to-day operational energy use or to life-cycle carbon emissions, including that embedded in its construction?
- Does it apply to each home individually, or development-wide (or by phase for larger schemes), whereby some homes may not need to meet the standard, if the development as a whole does?
- Does it include or exclude potential off-setting arrangements where the homes themselves might not be zero carbon, but offset payments have

been made (for example into a fund to allow the Council to improve energy efficiency in older housing stock)?

Zero carbon might refer to all or any of these but its meaning will have implications for the form of development and its viability.

6.14 *What is the role of RCTs uplands in combating Climate Change*

Historically, development plans such as the LDP have focussed on managing development in and around urban areas with little more than a presumption against development in areas such as the uplands of RCT. However, more consideration will need to be given to the value of these areas and the role they can play. For example, our upland peat bogs have a significant role in carbon storage but also a potential role in managing water storage for flood prevention - are these roles mutually exclusive? The upland areas have significant potential to support wind and solar energy development but these developments along with their associated infrastructure have the potential to compromise the hydrology of the peat bog ecosystem. The intrinsic quality of our uplands has the potential to support a significant increase in the tourism economy in RCT so what considerations will the LDP need to balance the benefits to the local economy from increased development and visitors in the uplands alongside the potential detrimental impacts this could have on the environment.

6.15 *What is the group's view on the density of development around Metro nodes and car free policies on new development?*

The LDP will certainly need to take into consideration the Cardiff Capital Region City Deal Metro and electrification of the South Wales Central Valley Line. Not only should this improve air quality from current rolling stock, but we must also capitalise on this investment. All opportunities should be sought to identify land for development around these public transport nodes. Furthermore, these are often located within existing urban centres. However, the density of development in towns has long been a point of contention in the determination of planning applications with space standards and the level of off street parking in particular being regular reasons for refusal of applications for new flats and apartments. The views of the group on how the LDP should balance these issues would be welcome.

6.16 Listed in Appendix 1 of this report, below, are summaries of Plans and Policies of other Local Authorities relating to this Climate Change and carbon reduction agenda. As this Appendix indicates, there are relatively few examples across the UK of such good practice, although it is not so say that this list is an exhaustive one.

7 EQUALITY AND DIVERSITY IMPLICATIONS

- 7.1 There are no equality or diversity implications as a result of the recommendations set out in the report.

8 CONSULTATION / INVOLVEMENT

- 8.1 The views of this Steering Group will make an important contribution and inform the deliberations of Cabinet, whilst also informing the preparatory and consultation stages of the revision of the LDP.

9 FINANCIAL IMPLICATION(S)

- 9.1 It is considered that any financial implications from this report will be associated with the formulation of the required evidence base for the preparation of the Revised LDP.

10 LEGAL IMPLICATIONS OR LEGISLATION CONSIDERED

- 10.1 The proposals will be considered through the preparation process of the statutory revision of the LDP.

11 LINKS TO THE CORPORATE AND NATIONAL PRIORITIES AND THE WELL-BEING OF FUTURE GENERATIONS ACT.

- 11.1 Preparation of the revised LDP will embrace the principles of the Corporate Plan, along with the wellbeing goals and five ways of working as identified within the *WBFG Act*. The revised LDP will also be guided by the aims and objectives set forth in the Cwm Taf Well-being Plan 2018-2023 entitled *Our Cwm Taf*. The revised plan will also be influenced by the cultural, economic, environmental and social well-being goals and objectives within *Our Cwm Taf*, where they relate to land-use planning.

12 CONCLUSION

- 12.1 Members of the Climate Control Cabinet Steering Group are requested to consider the information presented in this report and provide their observations to Cabinet.

Appendix 1 – Examples of other Authority’s Plans and Policies.

Swansea Local Development Plan

Swansea Council adopted the Local Development Plan (LDP) for their area in February 2019, and forms the statutory development plan for Swansea Council. It promotes a placemaking agenda and the WG well-being objectives. Some policies contained within the LDP specifically make reference to decarbonisation or carbon neutral ambitions, as detailed below;

- Chapter 1 – Plan Strategy details greater resilience needs to build into energy supply, and energy efficiency needs to be promoted as a means of supporting decarbonisation. Locally identified energy infrastructure and renewable energy generation to help meet carbon reduction requirements, such as Swansea Bay tidal lagoon.
- Strategic Objectives 6 – Encourage appropriate development of low carbon and renewable energy resources and energy infrastructure.
- Policy PS 2 Placemaking and Place Management includes criteria that developments should: *“Maximise opportunities for sustainable construction, resource efficiency and contributions towards increased renewable or low carbon energy generation”*
- Policy SD 2 Masterplanning Principles includes development should *“integrate opportunities where appropriate to minimise carbon emissions associated with the heating, cooling and power systems for new development”*
- Policy ER 1 Climate Change includes development proposals should take into *“reducing carbon emissions”* and *“promoting energy and resource efficiency and increasing the supply of renewable and low carbon energy”*. The policy expands to say a reduction in carbon emissions will be achieved by means of controlling the energy demand associated with development through maximising energy efficiency. Secondly, sustainable sources of energy should be incorporated, without reliance on fossil fuels. Information about carbon sinks acting as a means of off-setting carbon emissions by natural means.
- Policy EU 1 Renewable and Low Carbon Energy Proposal sets out the criteria for low carbon energy development.
- Policy EU 2 Renewable and Low Carbon Energy Technology in New Development. Development will be required to maximise the contribution of renewable or low carbon energy technology to meet the energy demands of the proposal, particularly for Significant Energy Consuming Developments.

Swansea Council operate Ultra Low Emissions Vehicles for their public sector fleet.

Merthyr Tydfil LDP

Key issues identified as part of the LDP include the quality and energy efficiency of the existing housing.

Home energy use is the primary cause of local Green House Gas emissions. Carbon budgeting is set to drive demand for renewable and low carbon energy.

The LDP makes clear that the plan can't deliver all local wellbeing outcomes, as many issues extend beyond 'land-use planning' influences. However, the LDP contributes to creating the right conditions to support their delivery.

LDP Objective 6: 'Sustainable Design' To promote high quality, sustainable and inclusive design and support measures which mitigate the predicted effects of climate change. The plan objectives will help deliver on the vision, and have been identified with regard to local issues raised through consultation.

LDP Objective 7 Transport: To support an integrated transport system, promote active travel and ensure new developments are accessible by walking, cycling and public transport links.

LDP Objective 16 Renewable Energy: To promote renewable and low carbon energy.

Renewable energy presents an opportunity to reduce carbon emissions and generate income. The Plan has been informed by a Renewable Energy Assessment (2017) that has identified areas of opportunity. Contributing towards renewable energy generation is supported by the Plan through the inclusion of positive policies for renewable energy and the identification of Heat Priority Areas, where opportunities for district heating could be exploited, and Local Search Areas for solar energy. A local contribution target towards renewable energy production is also included in the Plan's monitoring framework.

Joint Transport Plan for South West Wales

New technologies for electric vehicles could lead to a step change in connectivity and function and form of transport networks. Swansea and Carmarthenshire authority areas have introduced electric vehicles fleet for council use. Scheme proposals to implement a network of electric vehicle charging points across South West Wales.

London Borough of Merton – Case Study

In 2003, Merton introduced a planning policy that required all new build

developments to generate 10% of their electricity from on-site renewable sources. This has been adopted further across the UK and is known as the 'Merton Rule'.

The local plan includes sustainability standards, such as an overarching policy that sets out "new development should be designed to minimise emissions arising throughout their lifetime". The plan also includes a Policy EP H6 Environmental Protection which sets out how proposals must contribute to improving air quality and applicants must investigate the feasibility of CHP and district heating schemes.

Climate change and energy performance is detailed as information that should be provided in support of planning applications to Merton Council. An energy strategy should be provided for each site that demonstrates environmental improvements.

Merton Council declared a Climate Emergency, and is in the process of developing a Climate Change Action Plan for the council area. The council has also previously produced a Climate Change Strategy and Action Plan 2014-2017 that sets out how the council intends to tackle climate change. The strategy includes areas such as energy, planning and development, sustainable resources and the natural environment.