



Rising to the climate change challenge: The role of housing and planning within local councils





APSE

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The Town and Country Planning Association

The Town and Country Planning Association (TCPA) is an independent charity that works to challenge, inspire and support people to create and transform communities so that everyone thrives in socially just, healthy, sustainable and resilient environments. To that end, the TCPA aims to improve the art and science of planning in the UK and abroad and work to secure fresh perspectives on major issues, including planning policy, housing, regeneration and climate change.

Informed by the Garden City Principles, the TCPA's strategic priorities are to:

- Work to secure a good home for everyone in inclusive, resilient and prosperous communities, which support people to live healthier lives.
- Empower people to have real influence over decisions about their environments and to secure social justice within and between communities.
- Support new and transform existing places to be adaptable to current and future challenges including the climate crisis.



Contributors

Project team, the TCPA: Fiona Howie (Chief Executive), Alex House (Projects and Policy Manager), Cova Cervilla Bordiu (Projects Officer). Project team, APSE: Paul O'Brien (Chief Executive), Mo Baines (Deputy Chief Executive) and Vickie Hacking (Principal Advisor).

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Foreword

Once again APSE has collaborated with the TCPA to deliver a further report on the issues of housing, planning and place-making. However, this year the report presents a specific focus on climate change issues.

The UK's Climate Change Committee Sixth Carbon Budget (Local Authorities Report) states that UK homes make up 25% of total energy use and 15% of our emissions. It is clear from these statistics that the UK will not meet its ambitious carbon reduction targets without tackling emissions from homes. And yet councils are frustrated and hindered, by planning regulations and policies, which fail to empower them to be able to do more in tackling harmful developments. Indeed, in many cases planning regulation and policy has been detrimental to climate actions; think permitted development rights and ongoing fossil-fuel reliant new builds.

Councils have not been defeated by these challenges but have instead worked through solutions, taking proactive measures to develop local solutions. As the case studies in the report highlight in areas like Swansea the innovative 'Swansea Standard' is delivering lower carbon homes, ending reliance on fossil-fuels and addressing energy affordability with residents. The Greater Glasgow region is faced with the need to retrofit 430,000 homes with alternatives to gas heating and with better insulation, so the Council is working to significantly reduce its emissions footprint with building rationalisation and retrofitting measures. It aims to cut its carbon emission by 50% from current levels. In Salford, Greater Manchester, the Council's ambitions include the delivery of 417 new affordable eco-homes, built through their own housing company. They also have strong policies on adaptation; design, green infrastructure and flood risk to support and protect residents, and they are able to identify areas for renewables schemes, all supporting their aims to decarbonise buildings and assets.

However, these impressive efforts by councils across the UK could be upscaled and maximised if planning and housing policy was truly supportive of climate change actions. Instead, while there are differences across England, Wales, Scotland and Northern Ireland, this research report identifies gaps in regulation and planning policy which stymies attempts to go further and faster on climate change. England in particular remains in a system that is often developer-led and risks the quality of future homes resting on a post-code lottery of land values.

There has been much talk of the cost-of-living crisis, driven in part by oil and gas price inflation, alongside the Levelling Up and Regeneration Bill, which seeks to address the left behind towns and communities. Is there any better starting point for the levelling up journey than to address quality homes which do not cost the earth in carbon, and deliver affordable warm and decarbonised homes for local communities?

Paul O'Brien, APSE Chief Executive

Executive Summary

Climate change is the greatest long-term challenge facing the world today. The Climate Change Committee, the UK's independent adviser on tackling climate change, has been clear that emission reduction targets will only be achieved if national governments, regional agencies and local authorities work together¹. The importance of the relationships between central and local levels in determining the success of public policy outcomes was also a key message from the APSE Local Government Commission 2030.

While addressing climate must be a priority for local authorities, it is not the only issue they must seek to address. The ongoing and long term need for more affordable housing is another priority.

This report considers the important role of local authorities with an emphasis on their responsibilities in relation to housing and planning because these are crucial tools to delivering the homes and communities people need, within places that are low or zero carbon and resilient. Place-making, for example, is a vital opportunity to promote sustainable transport, low carbon energy systems, high-quality, low carbon buildings and the retrofitting of existing homes, including genuinely affordable housing. The impacts of our changing climate are, however, already being seen. Planning and housing policy as well as legislation have a role in supporting places to be resilient now and in the future.

Drawing on the findings of a survey sent to all local authorities within the UK, policy analysis, a roundtable discussion, and detailed consideration of five case studies, the report highlights that important work is already being undertaken by local authorities through their approach to both housing and planning. The survey responses showed, for example, that 85% of respondents said their local authority declared a climate emergency and many have set out targets to reach net zero by 2030. However, respondents also highlighted concerns about how to achieve those targets. The report aims, therefore, to encourage and inspire further action from local authorities, but it also highlights some key reflections and lessons for local authorities. It recognises barriers that exist which, if tackled, could enable more, and more urgent, action.

Recommendations for national governments

To enable more urgent action at the local level the report makes the following recommendations:

Local authorities need to be sufficiently resourced to enable them to undertake their planning function and transform places holistically. Local authorities have an essential role to play and their interventions on a wide range of issues, including retrofitting the existing housing stock and seeking to secure new genuinely affordable housing. More demands or expectation cannot, however, continue to be placed on local authorities without sufficient funding and skills development.

Governments need to prioritise and support the development of skills both within local authorities and relevant industries to enable the creation of new, and regeneration of existing, places that meet the needs of communities and are future-proofed. Retrofitting homes, creating local plans that will enable the development of resilient new communities, implementing biodiversity net gain and supporting the implementation of new renewable technologies, for example, require different skills and approaches from both local authorities and their supply chains. For local authorities, elements of training and peer-to-peer support can and are provided by a range of organisations, but this cannot be in place of core, targeted support.

1 Local Authorities and the Sixth Carbon Budget. Climate Change Committee, Dec. 2020. <https://www.theccc.org.uk/publication/local-authorities-and-the-sixth-carbon-budget/>

Governments should issue guidance in some specific areas to support planning for climate change.

This would reduce the risk of inefficiencies and misunderstanding. Particular areas of focus should be on providing clarity that local plan policies can go beyond building regulations, guidance on minimum targets for carbon reduction to make sure all local authorities are in line with national targets, and guidance on carbon handling and assessing baseline emissions.

As is being seen in Scotland, national planning frameworks need to be established in all four nations that bring together thematic and spatial policies. Such an approach would provide a vital source of key data on national and strategic growth issues as well strategic constraints. The frameworks would synthesise and make transparent the differing national policies which shape local development, allowing local communities to understand what is going to happen to them and what they can do about it.

Mitigating and adapting to climate change needs to be embedded in the priorities of the Planning Inspectorate in England and Wales, the Planning and Environmental Appeals Division in Scotland and the Planning Appeals Commission in Northern Ireland. The importance of climate change and reducing emissions needs to be reinforced through all appeal decisions, in order to give local authorities the confidence to place weight on the issue as well, and local plans should only be found sound if they will help to deliver national carbon emissions targets and more resilient communities.

The role of local authorities in relation to housing and planning needs to be recognised at both the national and local levels as central to the levelling up agenda and supported as such. This recognition should be reflected in funding and policy in order to support local authorities to work with national governments to achieve this UK-wide policy priority. There is a need for more certainty and long-term funding to support local authorities in tackling climate change, securing the delivery of more affordable housing and retrofitting the existing housing stock. Elements of funding must also recognise that the market will not and cannot deliver energy efficient homes in low value areas and bridge that gap in order to prevent the development of homes now, that will need expensive retrofitting in the near future.

In England, powers that have been removed through the expansion of permitted development rights must be restored to local authorities. This is essential in order to allow local authorities to masterplan, revitalise high streets and secure funding for affordable housing, green infrastructure and public transport infrastructure through Section 106 agreements and the Community Infrastructure Levy. In line with the desire in the Levelling Up White Paper to empower local leaders and communities, powers should be restored to local authorities so that where existing buildings are converted, this is enabled through the planning system.

Conclusion

As the Glasgow Climate Pact recognises, ‘multilevel action and collaboration’ is vitally important and many places across the UK have made great strides towards a net zero future. This report shows that targets are being set and action is being taken by the vast majority of the local authorities that responded to the survey. It also shows that many local authorities are trying to be ambitious through their role in relation to housing and planning. Not only to reduce emissions, but to address the wider challenges of climate mitigation and adaptation and deliver the high-quality homes and communities that people want and need.

However, to mitigate and adapt to climate change, ambitious action is needed by all local authorities. Drawing on the survey responses, roundtable, policy analysis and the case studies, this report makes clear that if local authorities across all four nations are to consistently and collaboratively rise to the climate crisis, then national governments need to take their enabling role more seriously and take urgent steps to better support ambitious action at the local level.

1. Introduction

APSE and the TCPA have been collaborating since 2015 to track the housing crisis and provide guidance on how local authorities are and can deliver high quality homes and places. This ongoing partnership has produced a series of reports covering a wide range of topics including housing delivery, which was the focus for *Housing the Nation* (2015) and *Homes for all – Ensuring councils can deliver the homes we need* (2016); local authority housebuilding and partnership delivery, for example *Building Homes, Creating Communities* (2017); homelessness, in *Delivering Affordable Homes in a Changing World* (2018); the many links between housing and wider social and economic resilience which was considered in *Housing for a Fairer Society* (2019); and planning and delivering housing for health and wellbeing, see *At a Crossroads: Building Foundations for Healthy Communities* (2020). The most recent report, published in 2021, considered the role local authorities could take to drive forward a green recovery in *Bystanders or innovators? How local authorities can use place making to drive the green recovery*.

As well as continuing to track the housing crisis, this year's research considers the role local authorities can play and are playing through their planning and housing responsibilities to urgently reduce carbon emissions and work towards achieving net zero, while also supporting places to be more resilient to the impacts of climate change and supporting a just transition to a greener economy in tackling fuel poverty in the UK housing stock.

1.1 The role of local authorities in relation to planning, housing and climate change

Climate change is the greatest long-term challenge facing the world today. In November 2021 the UK, in partnership with Italy, hosted the UN Climate Change Conference (COP 26). The output from this event was the Glasgow Climate Pact, which was supported by almost 200 countries and seeks to accelerate action on climate and to keep alive the hope of limiting the rise in global temperature to 1.5°C. Importantly for local authorities, the final agreement recognised the need for 'multilevel action and collaboration'²

Back in December 2020, the Climate Change Committee was clear that emission reduction targets will only be achieved if national governments, regional agencies and local authorities work together³. This important point is reinforced by the UK Government's *Net Zero Strategy: Build Back Greener*⁴, which was published shortly before COP26 started and states:

'Devolved and local government play an essential role in meeting national net zero ambitions. Across the UK many places have already made great strides towards our net zero future, having set their own targets and strategies for meeting local net zero goals. Taking a place-based approach to net zero is also vital to ensuring that the opportunities from the transition support the government's levelling up agenda.'

The strategy goes on to acknowledge that while 'excellent work' is underway, there remain significant barriers to maximising place-based delivery on net zero, and that some places are 'moving faster than others'.

2 Glasgow Climate Pact. United Nations Framework Convention on Climate Change, Nov. 2021. https://unfccc.int/sites/default/files/resource/cop26_auv_2f_cover_decision.pdf

3 Local Authorities and the Sixth Carbon Budget. Climate Change Committee, Dec. 2020. <https://www.theccc.org.uk/publication/local-authorities-and-the-sixth-carbon-budget/>

4 Net Zero Strategy: Build Back Greener. HM Government, Nov. 2021. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1033990/net-zero-strategy-beis.pdf

The Scottish Government's recently published twenty-year vision for housing, *Housing to 2040*⁵ similarly sets out their commitment to adapt and retrofit existing homes to improve energy efficiency and decarbonise heating, whilst recognising that councils, in their role through housing supply and delivery, can act as a significant contribution to ending climate change emissions.

Within the Welsh Government, the Minister for Climate Change set out in October 2021 plans to support the building of 20,000 low-carbon social homes for rent in Wales by 2026, with private developers expected to adopt the Welsh Development Quality Requirements 2021 to phase out fossil fuel boilers in new homes⁶.

Whilst social housing responsibilities sit with the Northern Ireland Housing Executive, local authorities have a role in planning, and the Climate Change (No 2) Bill is significant in setting climate change targets within Northern Ireland.

Requirements in relation to existing and new housing, and the planning system's role in shaping places, are therefore considered crucial tools, throughout the UK, in working to achieve commitments on net zero. Placemaking, for example, is a vital opportunity to promote sustainable transport, low carbon energy systems, high quality, low carbon buildings and retrofitting existing homes. In addition to these, policy and plans must go further. Specifically, the impacts of our changing climate are already being seen and planning and housing policy and legislation also have a role in supporting places to be resilient now and in the future. This includes matters such as overheating, flood risk and nature-based solutions.

Both mitigation and adaptation need to be a priority in local plan-making, decision-taking and in relation to housing policy.

1.2 Research approach

There are four components to the research that underpins this report:

- A high-level desk-based review of the national policy context in England, Scotland, Wales, and Northern Ireland.
- Responses to an online survey. The survey was sent to representatives at all local authorities across the UK in late November 2021 and early 2022, responses were received from a range of councillors and officers. The majority of respondents were based in England, but there was a good balance of representation of councils under different political control and between councillors and officers (see annex).
- Analysis of five case studies. These case studies were selected to ensure geographical diversity and represent different challenges and opportunities in relation to adapting to, and mitigating, climate change.
- A roundtable with experts and people from local authorities and additional conversations with local authority officers and experts to explore best practice, barriers and opportunities in relation to climate change.

Drawing on this research, the report highlights important work already being undertaken by local authorities through their approach to both housing and planning and hopes to inspire further action from local authorities. As the Net Zero Strategy recognises, however, significant barriers remain. This report also seeks to better understand some of those barriers and makes recommendations about how they could be overcome.

5 *Housing to 2040*. Scottish Government. March 2021 <https://www.gov.scot/publications/housing-2040-2/>

6 *Net Zero Wales*. Welsh Government. October 2021. <https://gov.wales/net-zero-wales>

2. The state of play: policy and legislative context

In 2019, the UK became the first major economy in the world to pass laws to end its contribution to global warming by 2050⁷. The target requires the UK to bring all greenhouse gas emissions to net zero by 2050 although, as set out in Box One below, Scotland plans to be even more ambitious.

In December 2020, the Committee on Climate Change published *The Sixth Carbon Budget: the UK's path to Net Zero*⁸. The UK subsequently enshrined a new target of reducing emissions by 78% by 2035 in law in April 2021⁹. Each of the four nations are working towards achieving these reductions through different policies and strategies.

Box 1: Climate change targets in the devolved nations

Each devolved nation also has its own climate change targets, supplementing action under the Climate Change Act 2008. In some cases, the devolved administrations are more ambitious than the UK as a whole:

Scotland plans to cut emissions to net zero by 2045, five years ahead of the target for the UK as a whole and generate 70% of Scotland's overall energy consumption from renewables by 2030. Climate Change (Scotland) Act 2009 requires local authorities to reduce emissions by 75% by 2030 and net zero by 2045.

Wales plans to reduce greenhouse emissions by 95% by 2050 but has ambitions to get as close to net zero as possible.

Northern Ireland has targets for 2050 and 2030 for the reduction of greenhouse gas emissions and requires the setting of a target for 2040 in its Climate Change (No. 2) Bill.

As highlighted in the previous chapter, the UK-wide *Net Zero Strategy: Build Back Greener*¹⁰ was published in 2021. Elements of this strategy were then echoed in the White Paper, *Levelling Up the United Kingdom*,¹¹ which was published in February 2022. The White Paper does at least recognise that the transition to net zero will be different for different places across the UK stating:

'The net zero transition could create huge opportunities for many of the UK's left-behind places, but also poses risks for them which, if unmanaged, could be damaging. Parts of the UK that need to undergo the largest transition lie outside the South East, often in some of the least well-performing areas of the UK. As home to the largest emitting industrial sectors (manufacturing, aviation and shipping), emissions per capita are higher in the Midlands and North of England, as well as Scotland, Wales and Northern Ireland, more than one in every two jobs in carbon-intensive industries are in the Midlands, the North and Scotland. While the transition to net zero will be disruptive for these places, it could also be transformative.'

7 'UK becomes first major economy to pass net zero emissions law'. Department for Business, Energy and Industrial Strategy, Jun. 2019. <https://www.gov.uk/government/news/uk-becomes-first-major-economy-to-pass-net-zero-emissions-law>

8 *The Sixth Carbon Budget: The UK's path to net zero*. Committee on Climate Change, Dec. 2020. <https://www.theccc.org.uk/wp-content/uploads/2020/12/The-Sixth-Carbon-Budget-The-UKs-path-to-Net-Zero.pdf>

9 'UK enshrines new target in law to slash emissions by 78% by 2035'. Department for Business, Energy and Industrial Strategy, Apr. 2021 <https://www.gov.uk/government/news/uk-enshrines-new-target-in-law-to-slash-emissions-by-78-by-2035>

10 *Net Zero Strategy: Build Back Greener*. HM Government, Nov. 2021. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1033990/net-zero-strategy-beis.pdf

11 *Levelling Up the United Kingdom*. HM Government, Feb. 2022. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1052706/Levelling_Up_WP_HRES.pdf

This highlights that action to mitigate and adapt to climate change will need to be wide-ranging and while local authorities will be able to drive forward certain changes, there will also be a need for national leadership and support. A huge raft of policy, funding programmes and legislation is, therefore, relevant including the recently published *British Energy Security Strategy*¹². This chapter does not seek to summarise all the strategies on transport, energy, nature, economic growth, flood risk management and so on. Instead, it seeks to highlight some of the key documents that should inform place-making in each of the four nations.

The APSE Local Government Commission 2030¹³ also found a number of synergies with this latest research paper. These are explored further in chapter three.

2.1 England

While the UK's targets focus on reducing greenhouse gas emissions, legislation also makes climate mitigation and adaptation central principles for local plan-making. This is through the Planning and Compulsory Purchase Act 2004 (as amended), which sets out the following requirement:

*'Development plan documents must (taken as whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.'*¹⁴

But other pieces of legislation are also relevant. The Environment Act 2021 aims to support improvement to air quality in England, restore natural habitats, increase biodiversity, and make better use of our resources. These changes will be driven by new legally binding environmental targets, and enforced by a new, independent Office for Environmental Protection which will hold government and public bodies to account on their environmental obligations. The Act sets out major roles for local authorities, and for example, will require local authorities to tackle air quality, and introduces statutory requirements for Biodiversity net gain of 10% on relevant developments. The Planning and Energy Act 2008¹⁵, which extends to both England and Wales, sets out powers for local authorities to require a proportion of the energy need related to new development to be sourced in the locality of the development, through renewable or low-carbon generation. It also sets out powers for local planning authorities to set energy efficiency standards that exceed the energy requirements of the Building Regulations.

The National Planning Policy Framework (NPPF)¹⁶ states in paragraph eight 'mitigating and adapting to climate change' is a core planning objective and, while Chapter 14 focuses solely on meeting the challenge of climate change, flooding and coastal change, much of the Framework and the accompanying *Planning Policy Guidance*¹⁷ cover relevant issues such as promoting sustainable transport, achieving well-designed places and conserving and enhancing the natural environment.

In recent years, substantial new amounts of guidance regarding design have also been published and the latest iteration of the NPPF explicitly requires all local planning authorities to prepare design guides or codes

12 *British Energy Security Strategy: secure, clean and affordable British energy for the long term*. HM Government, Apr. 2022. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1069973/british-energy-security-strategy-print-ready.pdf

13 See <https://www.apse.org.uk/apse/index.cfm/research/local-government-commission-2030/#> for more information

14 Planning Act 2008: <https://www.legislation.gov.uk/ukpga/2008/29/section/182>

15 Planning and Energy Act 2008: https://www.legislation.gov.uk/ukpga/2008/21/pdfs/ukpga_20080021_en.pdf

16 *National Planning Policy Framework*. Ministry of Housing, Communities and Local Government, Jul. 2021. <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

17 *Planning Practice Guidance*. Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities and Local Government. <https://www.gov.uk/government/collections/planning-practice-guidance>

in line with the principles set out in the *National Design Guide* and *National Model Design Code*. The *National Design Code*,¹⁸ which was published back in 2019 and updated in January 2021, sets out ten characteristics for a well-designed place (see Figure 1 below), which, together, the Guide argues will create a place's character, nurture and sustain a sense of community and work positively to help address environmental issues affecting climate. As part of pilots to further explore design codes, almost 40 councils and neighbourhoods have received funding, 25 of those through the Design Code Pathfinder Programme, which was announced in March 2022.¹⁹ While many have welcomed this emphasis on good design, it has been rolled out in parallel with the continued expansion of permitted development rights. As highlighted in APSE and the TCPA's 2021 joint report, *Bystanders or Innovators?*,²⁰ the upshot of this continued deregulation is that local authorities in England now have far less control over developments in their local areas than they once had.

Figure 1: The ten characteristics of well-designed places, as set out in the National Design Guide. Source: National Design Guide, Ministry of Housing Communities & Local Government, Jan.2021.



18 Parts one and two available at <https://www.gov.uk/government/publications/national-model-design-code>

19 'Communities empowered to shape design of neighbourhoods'. Department for Levelling Up, Housing and Communities, Mar. 2022 <https://www.gov.uk/government/news/communities-empowered-to-shape-design-of-neighbourhoods#:~:text=The%20Design%20Code%20Pathfinder%20Programme,in%20the%20places%20they%20live>

20 *Bystanders or Innovators? How local authorities can use place making to drive the green recovery*. APSE, Jul. 2021. <https://www.apse.org.uk/apse/assets/File/APSE%20TCPA%20Housing%20Report.pdf>

An important part of the context for planning and housing in England is ongoing uncertainty about proposed planning reforms. Proposals were set out and consulted on in August 2020 but a formal response or clarity around next steps are yet to be announced. The Levelling Up White Paper, *Levelling up the United Kingdom*,²¹ did refer to the need for further changes to the planning system, stating that ‘local plans will be made simpler and shorter, and improved data that underpins plans will ensure that they are transparent, understandable and take into account the environment that will be developed.’ It also stated:

‘Wider changes to the planning system will secure enhanced social and economic outcomes by fostering beautiful places that people can be proud of; improving democracy and engagement in planning decisions; supporting environmental protection, including support for the transition to Net Zero; and securing clear benefits for neighbourhoods and local people.’

Change is also on the horizon in relation to standards for new homes and buildings with the expected introduction of the Future Homes Standard and the Future Buildings Standard. The Government has stated that these will require new homes and buildings to be future-proofed with low carbon heating and world-leading levels of energy efficiency. Consultations are due to be published in 2023, with legislation to be taken forward in 2024, so the Standards can come into force in 2025. While it is important to seek to improve the quality of new homes and buildings, the retrofit of the existing housing stock remains a fundamental challenge.

2.2 Wales

Wales has a strong legislative framework which provides a foundation to address climate change, sustainable development and wellbeing at national through to local levels. This includes the Active Travel (Wales) Act 2013²², which provides the framework for improving the provision of infrastructure and encouraging walking and cycling, the Environment (Wales) Act 2016²³, which sets out requirements for the sustainable management of the countries natural resources, and the Well-being of Future Generations Act (Wales) 2015²⁴, which aims to improve the social, economic, environmental and cultural wellbeing of the people of Wales. The Act sets out seven wellbeing goals which public bodies must work to achieve:

- A prosperous Wales;
- A resilient Wales;
- A more equal Wales;
- A healthier Wales;
- A Wales of cohesive communities;
- A Wales of vibrant culture and thriving Welsh language; and
- A globally responsible Wales.

While this legislative framework should be a powerful tool for local authorities, a 2019 report by the Audit Office Wales found that ‘insufficient capacity and reducing resources are eroding planning authorities’ resilience’, and that it was undermining the delivery of national planning policy and the Wellbeing of Future Generations Act, which places significant additional burden on local authorities.²⁵

21 *Levelling Up the United Kingdom*. HM Government, Feb. 2022. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1052706/Levelling_Up_WP_HRES.pdf

22 Active Travel (Wales) Act 2013. <https://www.legislation.gov.uk/anaw/2013/7/contents/enacted>

23 Environment (Wales) Act 2016. <https://www.legislation.gov.uk/anaw/2016/3/contents/enacted>

24 Well-being of Future Generations Act (Wales) 2015. <https://www.legislation.gov.uk/anaw/2015/2/contents>

25 *The Effectiveness of Local Planning Authorities in Wales*. Auditor General for Wales, Jun. 2019 <https://www.audit.wales/sites/default/files-old/publications/planning-services-2019-full-report-english.pdf>

In 2021 *Future Wales: The National Plan 2040*²⁶ was published, which sets the strategic direction for planning and development in Wales over the next 20 years. As the foreword from the Minister for Housing and Local Government, Julie James MS, states:

'Future Wales positions [the Welsh] planning system to deliver a prosperous and fairer Wales where sustainable living and the efficient use of resources are the norm. We want to create places that support healthy and active lifestyles. By co-locating different land-uses we can minimise the amount of travelling we need to do to reach work, open spaces, shops and public services from our homes. Not only is this environmentally sound planning, it offers great social, economic and cultural benefits too.'

The National Plan gives spatial expression to long-term economic, social and environmental objectives. It has development plan status and it is, therefore, part of the statutory plan.

Following the publication of the National Plan, Julie James MS's Ministerial brief was expanded to cover transport, planning, housing and energy and she became the Minister for Climate Change. This is welcome recognition of the vital role of all of these policy areas in tackling climate change as well as the need for integration.

In the same year, Planning Policy Wales (PPW),²⁷ was updated. PPW's policies on place-making set requirements for high-quality and well-designed communities in which residents can easily access all the services that they need. Further guidance can be found in the *Placemaking Wales Charter*,²⁸ developed by the Welsh Government, the Design Commission for Wales and the Placemaking Wales Partnership, which promotes sustainable development principles such as sustainable locations for new development and prioritising walking, cycling, and public transport.

The other central pillar to PPW is decarbonisation: it contains policies on the promotion of active travel, ultra-low emission vehicles, promoting renewable energy developments, and restricting the extraction and use of fossil fuels (including fracking). The latest (11th) edition of PPW also embeds a whole system 'local area energy planning' (LAEP) approach.

In relation to housing specifically, the Welsh Government proposes to introduce new statutory housing standards in April 2023 relating to the repair, maintenance, and improvement of the existing housing stock. Within the new provisions of the Welsh Housing Quality Standard 2.0, there are ambitious proposals to make all existing social housing net zero carbon by 2033 by undertaking retrofit decarbonisation programmes to upgrade the thermal performance of existing fabric elements, microgeneration renewable technologies to reduce grid demand for power and light, and low carbon heating solutions to replace existing fossil fuel reliant systems²⁹.

2.3 Scotland

The Scottish Government has an entirely devolved town and country planning system, and therefore the Scottish planning system is significantly different from that in the rest of the UK. As set out in Box 1 on page 10, Scotland also has a target for net-zero emissions of all greenhouse gases by 2045. This target was embedded

26 *Future Wales: The National Plan 2040*. Welsh Government, Jul. 2020. <https://gov.wales/future-wales-national-plan-2040-0>

27 *Planning Policy Wales. Edition 11*. Welsh Government, Feb. 2021. https://gov.wales/sites/default/files/publications/2021-02/planning-policy-wales-edition-11_0.pdf

28 *Placemaking Charter*. Welsh Government, the Design Commission for Wales, and the Placemaking Wales Partnership. <https://dcfw.org/placemaking/placemaking-charter/> and *Placemaking Guide*. Design Commission for Wales and the Placemaking Wales Partnership, 2020. <https://dcfw.org/wp-content/themes/dcfw-child/assets/PlacemakingGuideDigitalENG.pdf>

29 This information is based on discussions from a Welsh Government policy sounding board.

in legislation by the Climate Change (Emissions Reduction Targets (Scotland) Act 2019³⁰, which amended the Climate Change (Scotland) Act 2009³¹. This increased ambition was accompanied by revised interim targets, updated arrangements for Climate Change Plans to meet the targets and includes new measures, such as the creation of a Citizens' Assembly³².

The 2018-2032 Climate Change Plan³³ lays out the Scottish Government's pathway to deliver the targets set by the Climate Change Act 2019, and how it will support a green recovery. The plan includes a road map for a co-ordinated, cross-cutting and systems-based approach to reducing greenhouse gas emissions, with themed sections on a whole-system energy approach, land use and nature-based solutions, the circular economy, transport demand, the planning system and wellbeing and national outcomes.

In relation to planning policy more specifically, Scotland has both a National Planning Framework (NPF)³⁴ and Scottish Planning Policy³⁵. The former is the long-term strategy for the country, outlining the national planning priorities for the Scottish Government. Statutory development plans must have regard to the NPF, and the NPF makes explicit reference to a low-carbon future for Scotland, setting out a vision of 'high quality, vibrant and sustainable places' in which 'our built environment is more energy efficient'.

Scottish Planning Policy (SPP) sets out national priorities for development and the use of land and lays out how planning matters should be addressed by local authorities across the country. It is non statutory guidance and exists as a statement of Ministers' priorities. A key required outcome set out in SPP is 'Outcome 2: A low carbon place – reducing our emissions and adapting to climate change'. Paragraph 19 states that: *'By seizing opportunities to encourage mitigation and adaptation measures, planning can support the transformational change required to meet emission reduction targets and influence climate change.'*

The fourth iteration of the National Planning Framework was laid before Scottish Parliament in November 2021 and a public consultation on it closed on 31 March 2022³⁶. The new Framework will incorporate Scottish Planning Policy and cover significant developments of national importance. Bringing together, therefore, spatial and thematic policies in one place. This will be substantially more integrated than the approach taken in England.

2.4 Northern Ireland

In Northern Ireland legislation on tackling climate change is comparatively sparse although its first laws on the subject are making their way through the Northern Ireland Assembly and should receive Royal Assent shortly. The Climate Change (No. 2) Bill³⁷ includes targets for 2050 and 2030 for the reduction of greenhouse gas emissions and requires the setting of a target for 2040. Interestingly, the 2030 target requires net emissions to be at least 48% lower than the baseline (the baseline years vary by greenhouse gas with carbon dioxide and methane being 1990 but others being 1995). The 2050 target for net emissions is at least 100% lower than the baseline, but a significant caveat states that methane emissions do not have to be more than 46% lower than the baseline.

The legislation also enables the creation of a system of carbon budgeting, which would enable the imposition of climate change reporting duties on public bodies and would create the appointment of a climate change

30 Climate Change (Emissions Reduction Targets) (Scotland) Act 2019. <https://www.legislation.gov.uk/asp/2019/15/enacted>

31 Climate Change (Scotland) Act 2009. <https://www.legislation.gov.uk/asp/2009/12/contents>

32 More information on its achievements: <https://www.climateassembly.scot/>

33 *Update to the Climate Change Plan 2018-2032: Securing a Green Recovery on a Path to Net Zero*. Scottish Government, Dec. 2020.

34 *Ambition, Opportunity, Place. Scotland's Third National Planning Framework*. Scottish Government, Jun. 2014. <https://www.gov.scot/publications/national-planning-framework-3/>

35 *Scottish Planning Policy*. Scottish Government, revised Dec. 2020. <https://www.gov.scot/binaries/content/documents/govscot/publications/factsheet/2021/05/transport-scotland-core-documents/documents/policy/scottish-planning-policy-spp/scottish-planning-policy-spp/govscot%3Adocument/scottish-planning-policy.pdf>

36 See <https://www.transformingplanning.scot/national-planning-framework/draft-npf4/?id=3904#id=3904>

37 Climate Change (No. 2) Bill. Northern Ireland Assembly. <https://www.niassembly.gov.uk/assembly-business/legislation/2017-2022-mandate/primary-legislation---bills-2017---2022-mandate/climate-change-bill/>

commissioner. There is also a requirement that the Assembly publish a climate change action plan within 24 months of the Act receiving Royal Assent.

Despite Northern Ireland being slower than the other nations to bringing forward bespoke climate change legislation, it has been reflected in a number of documents for some time. The Northern Ireland Climate Change Adaptation Programme 2019-2024, for example, puts forward adaptation approaches and actions for 'key priority areas', in order to bring about 'a resilient Northern Ireland which will take timely and well-informed decisions to address the socio-economic and environmental impacts of climate change'.

In relation to planning policy more specifically, the *Regional Development Strategy: RDS 2035*³⁸ is the spatial strategy of the Northern Ireland Executive, issued in 2010. It sets out a long-term plan for economic growth and sustainable development. The document sets out eight specific aims, one of which is to 'take actions to reduce [their] carbon footprint and facilitate adaptation to climate change'. Another aim is to 'protect and enhance the environment for its own sake'. More detailed policy is set out in 'regional guidance' (RG), including:

- RG9: Reduce our carbon footprint and facilitate mitigation and adaptation to climate change whilst improving air quality.
- RG12: Promote a more sustainable approach to the provision of water and sewerage services and flood risk management.

The Planning Act (Northern Ireland) 2011³⁹ sets out that the objective of the planning system is to secure the orderly and consistent development of land whilst furthering sustainable development and improving well-being. To support the achievement of this purpose, in 2015 the *Strategic Planning Policy Statement for Northern Ireland: Planning for Sustainable Development* (SPPS)⁴⁰ was published. This document sets out strategic planning policy on a range of planning issues, with the aim of furthering sustainable development and improving the wellbeing of the population of Northern Ireland. It has a statutory basis, and it must be taken into account in the preparation of Local Development Plans.

As with the English NPPF, the SPPS includes a section on mitigating and adapting to climate change, which sets out explicitly what the planning system should do to help address these challenges, and it also includes a range of other policy themes that are relevant, such as preserving and improving the natural environment, flood risk, renewable energy and good design. Paragraph 4.24 relating to good design, recognises that 'design is not limited to the appearance of a building or place but should also encompass how buildings and places function in use and over the lifetime of a development. This includes considering and addressing for example how the design of a development can minimise energy, water usage and CO₂ emissions.'

2.5 Conclusion

As highlighted, each of the nations within the United Kingdom have demonstrated a commitment to mitigating climate change. This is reflected in statutory targets for the reduction of emissions. There is also recognition in each country of the important role that planning and place-making can play in both mitigating, and adapting to climate change.

While these policies and commitments are welcome, we know there are often competing policies, which are not enabling a sustainable future for places. This is perhaps illustrated best by a continued reliance on fossil fuels. While this lack of national leadership is a barrier, as is a lack of resources for local authorities, the survey results and case studies in this report [see chapters three and four respectively] highlight the determination of local authorities and their desire and commitment to driving forward the change that is needed.

38 *Regional Development Strategy: Building a Better Future*. Department for Regional Development, Northern Ireland Executive, 2010. <https://www.infrastructure-ni.gov.uk/sites/default/files/publications/infrastructure/regional-development-strategy-2035.pdf>

39 Planning Act (Northern Ireland) 2011. <https://www.legislation.gov.uk/nia/2011/25/contents>

40 *Strategic Planning Policy Statement for Northern Ireland (SPPS): Planning for Sustainable Development*. Northern Ireland Department of the Environment, Sept. 2015. <https://www.infrastructure-ni.gov.uk/sites/default/files/publications/infrastructure/SPPS.pdf>

3. Survey results and analysis

As highlighted in Section 1.2 on page 9, to inform this report, a survey was sent to representatives at all local authorities across the UK in late November 2021. A total of 220 responses were received from a range of councillors and officers and there was an even representation of councils under different political control and across the devolved nations. The majority of respondents (81%) were, based in England; this reflects on the fact that 84% of the local authorities in the UK are in England. The data is presented for all respondents, in the cases where there was a divergence in views between the nations, those have been highlighted in the report. This chapter outlines the key findings from the survey and analyses the challenges and opportunities faced by local authorities. The analysis is also informed by the stakeholder roundtable, desk-based research and conversations with local authorities.

3.1 Delivering affordable homes in the UK

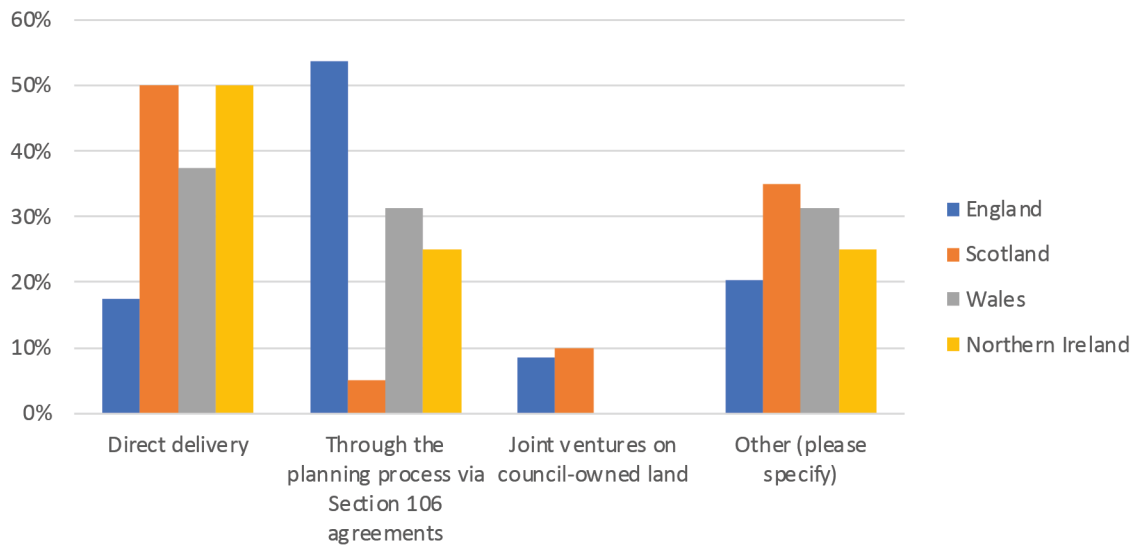
While much of the analysis below focuses on the key theme of this report – the role of local authorities in tackling climate change – as with previous years the survey continued to collect longitudinal data to gauge changes in local authority perceptions and approaches to affordable housing.

As Figure 2 below highlights, the vast majority of respondents have considered the need for affordable housing to be moderate or severe; those considering it severe has increased from 58% in 2016 to 69% in 2022. It is interesting to note that only 47% of respondents identified the planning system and Section 106 agreements as the dominant model of delivering social and affordable housing in their area. This is much reduced compared to respondents in 2015 (68% identified this model as dominant) and continues to reflect a shift in the last two years of local authorities getting involved in direct delivery and seeing a reduction in the dominance of one model, in favour of a more mixed approach. While the number of respondents from Wales, Scotland and Northern Ireland were small (42 out of 220), Figure 3 on page 18 illustrates that responses from the devolved nations reflect a greater emphasis on direct delivery than the English local authorities that responded. For example, Swansea Council has been successful in delivering new homes to their ‘Swansea Standard’ – a carbon-conscious whole-system build approach, which reduces operating energy and CO2 emissions over a building’s lifetime – see Section 4 on page 32 where this is explored in more detail.

Figure 2: How respondents characterised the need for affordable housing (i.e. homes available for subsidised or social rent) in their local area

	2016		2017		2018		2019		2020		2021		2022	
Severe	58%	69	63%	96	63%	89	58%	92	64%	138	67%	125	69%	149
Moderate	37%	44	35%	54	35%	49	40%	64	31%	67	30%	57	28%	61
Not substantial	3%	4	1%	2	2%	3	2%	3	5%	10	2%	3	2%	4
Don't know	1%	1	1%	1	0%	0	0%	0	0%	1	1%	2	1%	3
Total	118		153		141		159		216		187		217	

Figure 3: The dominant model of delivering social and affordable housing in respondents local authority area (217 respondents)



3.2 Local authorities’ commitment to climate change

The responses to the survey clearly reflect that most local authorities are committed to tackling climate change with 85% of respondents saying that their local authority had declared a climate emergency and 78% of those saying that it included a specific target. Of those that declared a climate change emergency, 65% said that it affected ‘the area covered by the council’ and 55% said it related to ‘the council’s own footprint’.

Only 14% of respondents stated that their local authority had not declared a climate emergency although some of those respondents justified their choices explaining that, despite them not declaring an emergency, they still had measures in place to tackle climate change:

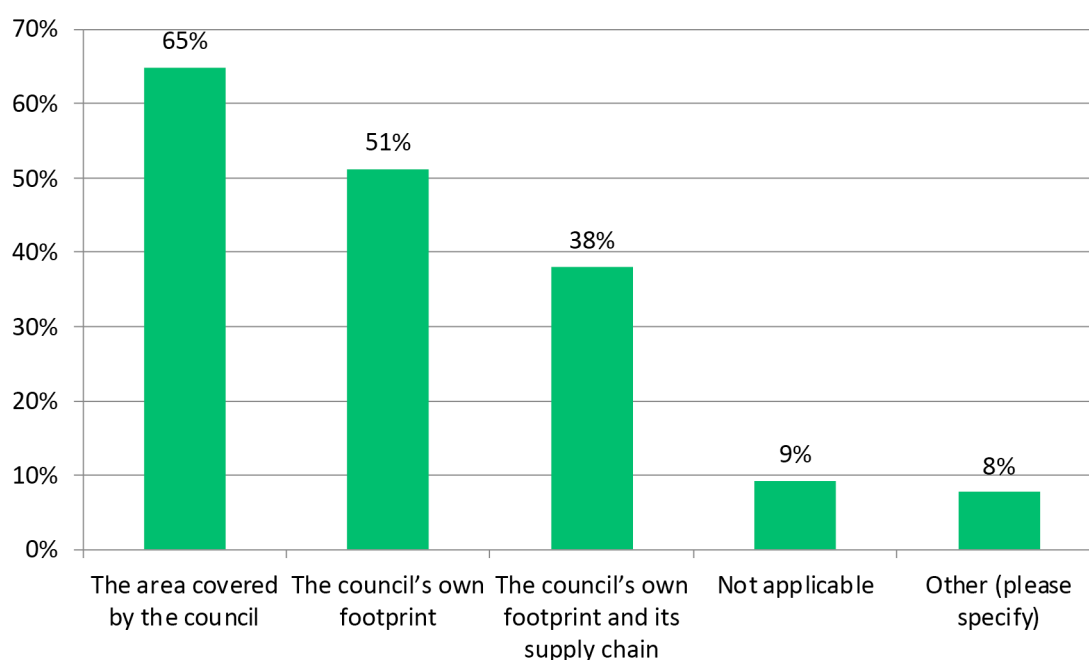
‘We are doing this without declaring an emergency – we are solving the problem’

‘Although [the Council] has not formally declared a climate emergency, it passed a motion in 2019 which acknowledged the Scottish Governments declaration and committed the Council to lead by example in accelerating the transformational change required to address the climate emergency.’

When climate emergencies were first beginning to be declared, there was a degree of scepticism about how meaningful some were in terms of targets, language and to the extent they would really result in action. Respondents were, therefore, asked whether their climate emergency included a specific target or date. 78% of respondents stated that their climate emergency does include a specific target and/or date. Of those with specific targets there were a range in terms of the language they used and what was trying to be achieved. As shown in Figure 4 on page 19, 65% of respondents stated that climate emergency related to the geographic area covered by the local authority.

For all types of targets the year most mentioned is 2030. Despite not being able to make a statistical analysis about the different targets, parameters and dates, the survey results do show that there are many local authorities setting targets that are much more ambitious than the UK Government’s target as enshrined in legislation with a portion of respondents saying that they will aim to be carbon neutral or net zero carbon by 2030 or earlier.

Figure 4: What the climate emergencies that have been declared relate to (205 respondents)



The targets at the organisational level focus on improvements in the council's environmental performance focusing on the assets that the council owns which could include their office buildings, their housing portfolio and management of vehicle fleet. However, these will not be enough on their own to meet the targets for greenhouse gas emissions in the national legislation. Targets are vital across all local authorities that aim to secure emission reductions for the whole geographic area. This can help focus local authority level action such as programmes that help residents, communities, partners and business to support the transition to net zero carbon by the agreed target date. In many cases, the targets at the internal level are earlier than the ones at the authority-wide level which is more achievable as it is the assets that the local authority is in control of.

It is important to note that a number of responses use the phrase 'carbon neutral' while others refer to 'net zero carbon'. In general, it seems that these terms are often used interchangeably. The Intergovernmental Panel on Climate Change (IPCC) suggests that this is correct [see box two below]⁴¹, although others argue there are subtle differences⁴². It should also be remembered that while ambitious targets on carbon reduction are both important and welcome, the target in the Climate Change Act refers more widely to greenhouse gas emissions, not solely carbon.

Box 2: Carbon neutral vs net zero carbon vs net zero

Net zero carbon emissions – Net zero carbon dioxide (CO₂) emissions are achieved when anthropogenic CO₂ emissions are balanced globally by anthropogenic CO₂ removals over a specified period. Net zero CO₂ emissions are also referred to as carbon neutrality.

Net zero emissions – Net zero emissions are achieved when anthropogenic emissions of greenhouse gases to the atmosphere are balanced by anthropogenic removals over a specified period. Where multiple greenhouse gases are involved, the quantification of net zero emissions depends on the climate metric chosen to compare emissions of different gases (such as global warming potential, global temperature change potential, and others, as well as the chosen time horizon).

41 See <https://www.ipcc.ch/sr15/chapter/glossary/>

42 For example see <https://www.newcivilengineer.com/latest/understanding-the-difference-between-carbon-net-zero-and-carbon-neutral-is-critical-12-08-2021/>

The importance of political leadership was discussed at the roundtable. With political cycles it is recognised that new councillors might not have been elected when climate emergencies were adopted, but attendees also highlighted examples of councillors being elected on the back of commitments in relation to climate change. As has been seen at the national level, there continues to be a range of views in relation to renewable energy types⁴³ – this is also the case at the local level. Where local authorities are leading the way in relation to climate change mitigation and adaptation this is often related to local leadership that is urging officers to be as ambitious and creative as possible.

The relationships between central and local level were also an important theme in the findings of the APSE Local Government 2030 Commission. It recognised that these relationships can determine the successes of public policy outcomes. In the case of planning and housing, the ambitions of local councils are often frustrated by overly centralised controls in areas such as planning. The Commission called for an end to fragmented policy development; replaced by a mature relationship which would provide a constructional status for local government; this would strengthen the local council role in planning, without risk of harmful interventions from the centre.

The Commission also recognised that councils have a role as ‘stewards of place’ coordinating outcomes which work in the best interests of their residents. Delivering affordable, sustainable homes, within healthy neighbourhood settings provides a multiplicity of positive outcomes; addressing housing need, ensuring housing quality, ensuring access to quality greenspace and public realm and developing outcomes which work for both the climate and local residents. The current system of housing and planning is too disconnected from this holistic vision presented by the Commission. Indeed, in too many cases developments work against the health and wellbeing of local people and the local environment. As the Commission argues, it is time for a system reset to ensure all public policy and public services work cohesively to deliver better outcomes, particularly in being able to affect real change, in decarbonising housing and create local actions on climate change mitigation and adaptation.

As well as ambition, in order to achieve reductions in carbon a crucial starting point will be understanding the baseline against which to judge any change. In response to a question about whether local authorities have an understanding of the relevant baseline carbon emissions, 96% said ‘yes’ (41% of respondents said ‘yes’, their local authority has a ‘comprehensive understanding’, whilst 55% answered ‘yes, to some extent’). Whilst it is encouraging that only 4% answered ‘no’ or that they were not sure, it is important that the 55% of respondents who have an understanding to an extent are supported to fully understand their baseline emissions if the targets they are working to achieve are to be meaningful.

Linking to the point about inconsistencies, one of the respondents stated *‘There is much scope for local planning policy to play a role in meeting climate emergency objectives – particularly around green infrastructure for example – but it would be very useful and perhaps more efficient if the Government could put in place effective national targets to achieve zero carbon development. This would also ensure consistent implementation across local planning authorities.’*

Inconsistencies were further explored at the roundtable. One participant highlighted that their local authority procured 100% green energy but that this was not included in their carbon targets. It was suggested, therefore, that a standardised measurement tool to monitor both baselines and progress against them would be beneficial.

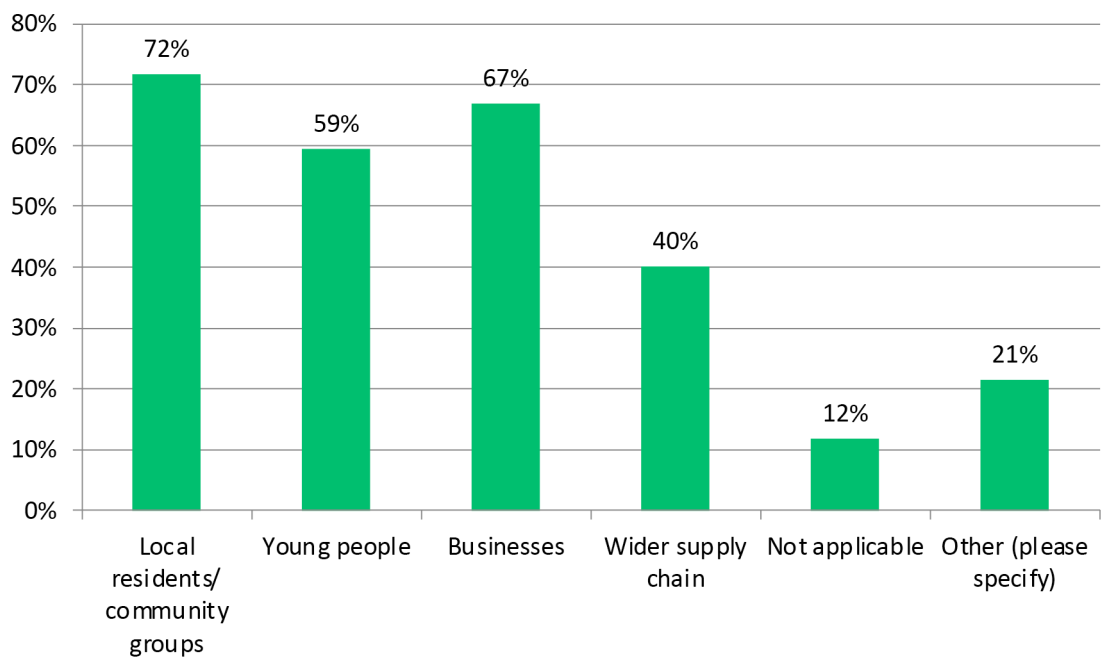
43 For example, the views on wind farms <https://www.bbc.co.uk/news/uk-politics-60837170>

3.3 Taking meaningful action

While targets are important and welcome, they need to be turned into meaningful action on the ground. It is positive, therefore, that 98% of respondents said that their local authority had a climate action plan or had one in progress. As shown in Figure 5 below, local authorities worked closely with various groups of stakeholders to inform their action plans, especially local residents and community groups, young people and businesses. In light of the impacts of climate change and the need for behaviour change, engaging with local stakeholders and the community is vitally important.

The answers for ‘other’ included the local university, environmental groups, the local authority’s housing provider and consultants. Some also mentioned that the local authority had set up different local partnerships such as an environment steering group, a forum of interested parties to take forward local initiatives or a Net Zero Partnership for large organisations within the local authority area.

Figure 5: Groups specifically involved in developing climate action plans (187 respondents)



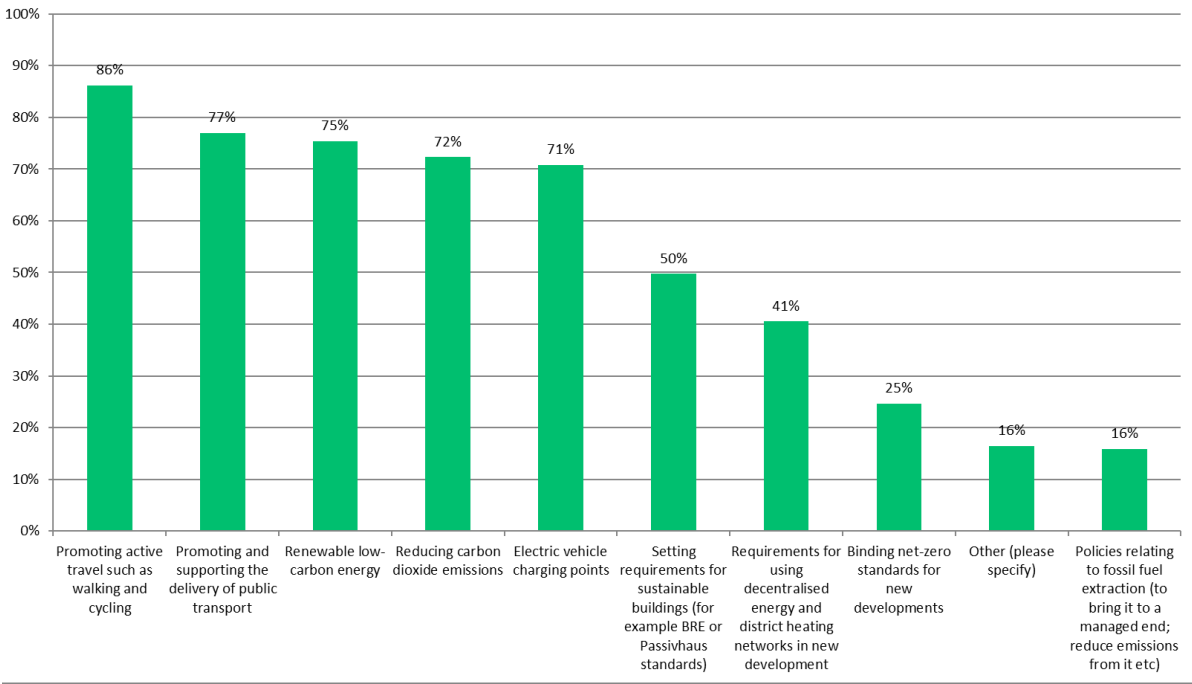
One of the respondents also highlighted the importance of a close working relationship between planning and public health professionals. Another respondent suggested engaging with professional bodies to align with leading sustainability sector leaders to avoid duplication and enhance a tangible delivery of the agenda.

As set out in Section 1.1 on page 8, the planning system could and should be a crucial tool in working to achieve commitments on net zero. Place-making, for example, must be an opportunity to promote sustainable transport, low carbon energy systems, high quality, low carbon buildings and retro-fitting existing homes. It is positive, therefore, that most local authorities (75% of respondents) stated that their development plan documents contain an overarching objective on climate change mitigation and adaptation. It should be noted, however, that for 34% of respondents this was in an adopted local plan, while for the further 41% the objective is currently in a draft plan. Less encouraging were the 12% of respondents who said that their local plans did not include an overarching objective relating to climate change.

Figure 6 on page 22 and figure seven on page 23 set out responses to questions about the types of policies local plans contain that will help mitigate and adapt to climate change. Those that responded ‘other’ explained

that they were referring to policies including sustainable construction, local energy schemes, multi-functional greenspace, air quality, Sustainable Urban Drainage Systems, sustainable forestry and soils. It is positive that such a wide range of policies are being included within development plan documents. What is worth noting, however, is that while there are five policy areas relating to mitigation and more than 70% of respondents say are covered in their local plans, only two policies relating to managing the impacts of climate change are as widely covered. The responses suggest that the majority of local authorities should be considering including new policies relating to tackling overheating, for example.

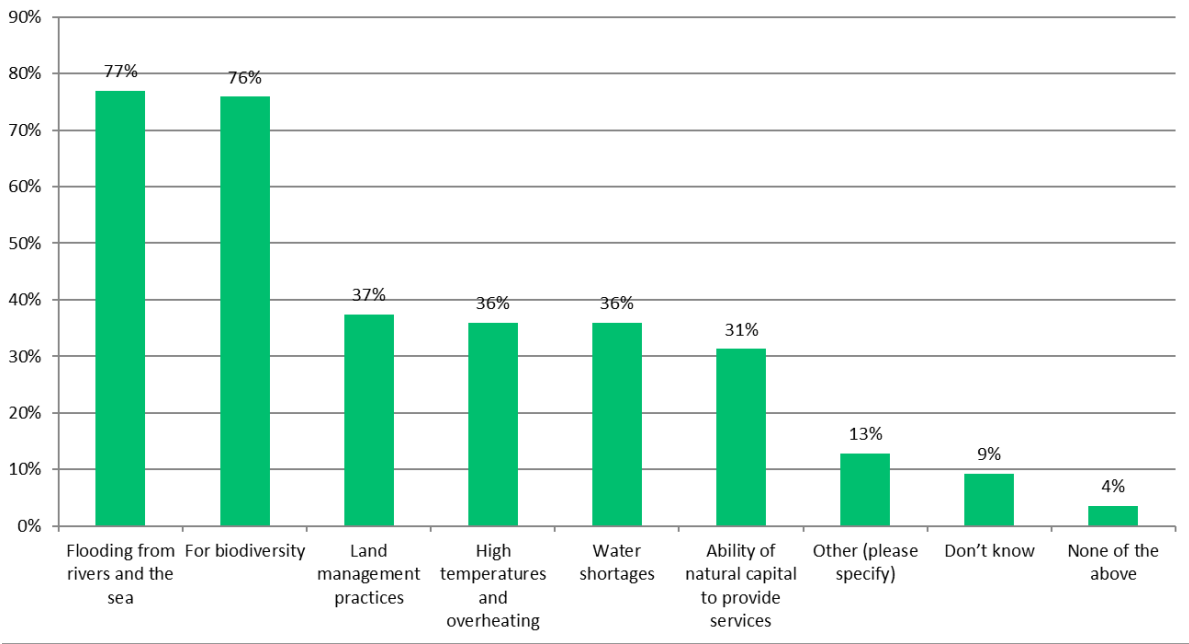
Figure 6: Policies relating to the mitigation of climate change included in development plan documents (195 respondents)



On the whole, the results of the survey indicate that local authorities are taking the right steps by including policies in their local development plans that relate to the mitigation and adaptation of climate and that seek to enable the creation of healthier, more sustainable and resilient places. However, some respondents highlighted the challenges faced when developing these documents. Some stated that it takes so long to develop a local plan that it makes it difficult to develop policies that respond to change, for instance, when setting climate targets or considering new technologies. This inevitably limits the powers of the local planning authority who actively try to consider all the needs of residents when setting their priorities and methods.

The issue of developing high quality local plans was discussed in more detail at the roundtable and is explored through a number of the case studies. The need for flexibility was an important theme and this is reflected in the Swansea Council case study, where the local authority decided to develop a bespoke standard for new homes rather than require a nationally recognised standard. The Salford case study also illustrates how they are adopting a flexible approach for their wind turbine opportunity area, which has been developed in order to not rule out areas based on the technology currently available. This seeks to recognise and hopefully enable the deployment of rapidly evolving technology.

Figure 7: Policies relating to managing/ adapting to climate change included in development plan documents (195 respondents)



The issue of guidance was also further discussed. In addition to the point about standardised measurement tools highlighted in the previous section, one participant suggested the area of guidance that was most urgently needed was in relation to policy and Building Regulations to address a known perception, which was illustrated by one of the respondents to the survey highlighting their frustration that Building Regulations constrain local policy. The confusion around this issue is likely to have been caused by amendments to the Planning and Energy Act 2008, which were intended to remove the power of local planning authorities to set higher standards than the Building Regulations. Importantly however, the amendments were never brought into force and, as the example in Box 3 on page 24 highlights, local authorities are setting policies that go beyond Building Regulations. The UK Government’s analysis and response to the consultation on the Future Homes Standard⁴⁴ reinforced that this was possible, stating [our emphasis]:

*We recognise that there is a need to provide local authorities with a renewed understanding of the role that Government expects local plans to play in creating a greener built environment; and to provide developers with the confidence that they need to invest in the skills and supply chains needed to deliver new homes from 2021 onwards. **To provide some certainty in the immediate term, the Government will not amend the Planning and Energy Act 2008, which means that local planning authorities will retain powers to set local energy efficiency standards for new homes.***

44 The Future Homes Standard: 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings. Summary of responses received and Government Response. Ministry of Housing, Communities and Local Government, Jan. 2021. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/956094/Government_response_to_Future_Homes_Standard_consultation.pdf

Box 3: Going beyond Building Regulations: Lancaster City Council

Many councils have declared climate emergencies, set net zero targets, and are opting to develop their own local energy efficiency standards that go beyond the minimum standards set through the Building Regulations. For example, Lancaster City Council has taken an innovative approach to applying Fabric First techniques to achieving more efficient homes; essentially requiring homes to be built to higher energy efficiency standards using the approaches to materials, insulation and air tightness that are often associated with building to Passivhaus standard. New homes in the district will not be reliant on the national grid being decarbonised to meet net zero targets, and new buildings are future proofed for homeowners, not burdened with dependency on fossil fuels.

Viability concerns were anticipated in response to the approach and positive engagement with local architects, housebuilders, and developers was undertaken. Unsurprisingly the most frequently raised concerns from the development industry were around viability. The Council, supported by their consultants, illustrated that their assessment of local build costs and values supported their proposed approach of building to a better standard – rather than alternative approaches such as adding bolt-on kit.

In January of this year, to support the Regulation 19 Stage consultation, the Council published *A User Guide to Development Management DPD Policy DM30a. How is the Local Plan Review addressing energy efficiency in Lancaster District?* The guide explains how Lancaster City Council is committed to reducing energy use in new buildings, particularly new homes, to reduce CO₂e emissions and energy costs for homeowners. The Council fully anticipates that the issue of the implications on residential development viability will be a focus of the forthcoming Examination. The Council has received a representation commissioned by a consortium of developers which challenges the Council's evidence on viability. However, other developers have been supportive, including major developer Peel, who stated that it 'is generally supportive of the amended policiesand understands the importance of ensuring matters arising from the climate change emergency declaration are adequately and appropriately considered in the Local Plan'.

This example illustrates how local authorities are considering the importance of building better standards from the outset, to prevent the need to retrofit in the future.

The user guide is available at <https://storymaps.arcgis.com/stories/74bf02d60d5948c892362e63d8fa585f>

Those respondents who had indicated their local plan documents contained policies relating to climate change were then asked whether they believed that the planning framework enabled the local authority to implement those policies. 80% of respondents agreed that it did, but the majority of those (71%) thought that it was only to 'some extent'.

Related to this point, respondents were also asked about their approach to climate in relation to development management. As shown in Figure 8 on page 25, respondents believe that their local authorities consider greenhouse emissions and adaptation to climate change the majority of the time in planning decision-making. While this is to be expected in light of local authorities' commitments to adapting to and mitigating climate change, in relation to both greenhouse gas emissions and adapting to climate change, 51% and 52% of respondents agreed 'to some extent' that they were material considerations. Once again, if land use planning is to be able to perform the transformational role it might in relation to climate, it is crucial to consider how local authorities' views can shift from 'some extent' to a more resounding 'yes'.

Figure 8: Greenhouse gas emissions, climate change and flood risk carrying weight in decision-making (195 respondents)

	Strongly agree	Agree to some extent	Neither agree nor disagree/ I'm not sure	Disagree to some extent	Strongly disagree	Weighted Average
A. My local authority recognises greenhouse gas emissions as a material consideration in planning decision-making	29%	51%	14%	5%	2%	1.99
B. My local authority recognises the need to adapt to climate change as a material consideration in decision-making	37%	52%	8%	2%	1%	1.79
C. My local authority always follows the advice from our national environment agency on planning applications, for example in relation to flood risk	46%	37%	13%	3%	1%	1.74

For the answers set out in Figure 8 above, responses were also analysed by nation to understand whether there was variation across the countries. The most notable, and only real divergence was in response to Question A, where a greater proportion of respondents in Scotland and Wales (11% and 13% respectively) responded that they 'disagreed to a certain extent' that their local authority recognises greenhouse gas emissions as a material consideration. While the percentages are still relatively small, they were considerably different to England where only 3% of respondents gave that answer.

For Question B, 100% of the respondents in Scotland stated either 'Strongly agreed' or 'Agreed to some extent'. Respondents in Wales were less confident with 80% agreeing. For Question C, a greater percentage of respondents marked 'strongly agree' in Scotland (58%) compared to Wales (37.5%) and England (45%). Overall, 89% of respondents in Scotland either 'Strongly agreed' or 'Agreed to some extent', 81% in Wales and 83% in England.

With the notable exception in relation to greenhouse gas emissions, there were no major differences in the way respondents from different nations have answered these questions. Looking at the data in this way does, however, seem to suggest that respondents in Scotland are more confident that their local authority recognises the need to adapt to climate change as a material consideration in decision-making and that their local authority follows advice from their national environment agency on planning applications.

A number of respondents also demonstrated some frustration with the current system. One respondent, for example, explained that the way the current legislative and policy framework operates in practice did not make local authorities confident enough to bring the right policies forward. Another respondent commented that the English planning system favours developers and consequently hinders local authorities implementing their plans and vision, which is difficult to challenge because of financial implications. While the survey did not ask about appeals, anecdotal evidence gathered through wide-ranging discussions with local authority planners and councillors highlights that the threat of going to appeal, and the related cost, is certainly a challenge for local

authorities. The role of the Planning Inspectorate in England and Wales, the Planning and Environmental Appeals Division in Scotland and the Planning Appeals Commission in Northern Ireland is therefore crucial in supporting the creation of high-quality local plans and ensuring important policies are implemented.

The issue of expanding permitted development rights (PDRs) is also relevant in England. The survey asked those respondents based in England whether they consider PDRs will help support the achievement of the Government's carbon emission targets. The majority of respondents (68.2%) did not think that PDR will help cut carbon emissions, which is perhaps surprisingly high because respondents recognised the potential benefits that come from reusing existing buildings and locating new homes in locations with access to reasonable public transport. Some responses did, therefore, highlight that when designed well, converted buildings have the potential to provide efficient and warm homes that make a positive impact upon carbon reduction strategies.

However, concerns were also raised that buildings converted to homes through PDR were often older office stock that is difficult to upgrade and make energy efficient. Barn conversations in isolated, unsustainable locations in rural areas were also highlighted.

There were also concerns raised about developers bypassing planning application processes and that as these developments are currently exempt from Community Infrastructure Levy contributions or Section 106 agreements, the local authorities are missing out on funding that could be used to support green infrastructure, active travel and public transport infrastructure schemes.

Another challenge for local authorities relevant to securing the implementation of plan policies are arguments from developers about viability. One respondent highlighted, for example, that their local authority is situated in an area of high deprivation with low value housing, which makes it hard to realise energy efficiency or design quality in a development. As it is an area of low land values, risk of flooding and low resident incomes, their viability margins are low and so attracting development is difficult, which in turn prevents the local authority from having high requirements for developers. The example in Box 3 on page 24, which focuses on a local authority seeking to go beyond Building Regulation requirements, also recognises that viability is being raised in response to it by developers.

Viability continues to be a challenge, despite significant changes in relation to English planning policy wording on viability were made back in 2019. This meant that the Planning Policy Guidance states:

'The price paid for land is not a relevant justification for failing to accord with relevant policies in the plan.'

This point highlights that despite the good intentions of some local authorities towards tackling climate change, in some parts of the country design and quality expectations are being reduced in order to attract developments. This situation reflects the paucity of effective planning regulations to tackle climate change with local authorities having to adjust their ambitions, and long-term outcomes, in order to pragmatically work within the confines of local circumstances, particularly in terms of land values. This type of pragmatic necessity is illustrated by the example in Box 4 on page 27. And while it is understood that local authorities do need to be pragmatic in relation to enabling viable development, it is also critically important that lower value areas, many of which will be in urgent need of regeneration, are not being forced to accept poor quality housing that risks perpetuating social challenges in the short term, and would need further investment to retrofit these properties in the future. Such perverse outcomes would go against the Government's stated ambitions in the Levelling Up White Paper.

Related to this, another respondent suggested that stronger Government legislation through Building Regulations would ensure all new builds embed energy efficiency and other adaptation and mitigation measures. Rather than leaving policy requirements to local planning authorities which are subject to viability issues. Elements of

this may be addressed through housing standards, such as the Future Homes Standard in England and the Welsh Housing Quality Standard 2.0, but in response to consultations on these standards, concerns have been raised that the requirements will not go far enough⁴⁵.

Box 4: Securing energy efficiency through pragmatic local plan policy

There is recognition that viability is more challenging in some parts of the United Kingdom than others. While local authorities want to rise to the challenge of securing much more energy efficient buildings as well as new homes, in the absence of dedicated funding for regeneration in areas where land values are lower, pragmatic approaches may be needed if new homes are to be secured.

One such example is the policies included in the draft Central Lincolnshire Local Plan, which is proposed to replace the existing plan adopted in 2017.

The Proposed Submission Local Plan includes policies setting out the design principles for efficient buildings and requirements to reduce energy consumption in new development. Policy S7 relates to residential development specifically. It requires new homes to be built to 'ultra-low' levels of forecast energy use and aims to go 'further and faster' than the proposed Future Homes Standard.

The policy includes, however, three clauses that may allow certain developments not to meet the full policy requirements. One of those relates to viability and states that if the development is in two small specific areas that have been mapped and are known to be lower value zones, then an Energy Statement will still need to be submitted, but justification could be made for why full delivery of the policy requirements cannot be met.

To see the Proposed Submission Local Plan please visit: <https://www.n-kesteven.gov.uk/central-lincolnshire/local-plan-review/>

3.4 Barriers to effective policy delivery

The survey was also an opportunity to ask respondents to consider the extent to which under-resourcing, lack of skills, national-level policy and national political leadership are a barrier to effective policy delivery. As was the case in surveys undertaken for the last two reports, respondents were asked to allocate a score out of five, with one meaning that the respondent felt that the factor was 'not at all' a barrier, and five meaning they felt it was an 'extreme' barrier. We asked them to do this in relation to the following twelve local policy topics:

1. Urban design and aesthetics
2. Health and wellbeing
3. Climate change adaptation
4. Climate change mitigation
5. Green space/ infrastructure
6. Housing delivery (market)
7. Affordable and social housing delivery
8. Reducing inequality and injustice
9. Local sustainable transport
10. Housing stock retrofit
11. New communities
12. Alternative approaches to local development

45 See for example - https://www.cse.org.uk/downloads/file/CSE_TCPA_Future_Homes_Consultation_Response.pdf

Resources and skills

As shown in figure nine below, the majority of respondents believe that under-resourcing is a barrier to a certain extent. The weighted average shows that responses were between three and four for all policy topics, they were highest for climate change mitigation and adaptation. Local sustainable transport was the third highest, followed by urban design and then retrofitting the existing housing stock.

Figure 9: The extent to which under-resourcing is a barrier to effective delivery in each of following planning-related policy topics. 'One' indicates that the factor is not a barrier at all, while 'five' indicates that it is a great barrier (173 respondents)

	1	2	3	4	5	N/A	Weighted Average
Urban design and aesthetics	5%	11%	29%	24%	25%	6%	3.56
Health and wellbeing	6%	16%	30%	27%	17%	4%	3.33
Climate change adaptation	4%	10%	23%	33%	26%	4%	3.7
Climate change mitigation	4%	11%	21%	34%	25%	4%	3.68
Green space/ infrastructure	6%	17%	23%	31%	19%	4%	3.42
Housing delivery (market)	7%	16%	31%	24%	17%	5%	3.28
Affordable and social housing delivery	5%	13%	29%	26%	21%	5%	3.47
Reducing inequality and injustice	7%	20%	31%	16%	18%	8%	3.2
Local sustainable transport	6%	10%	30%	20%	28%	6%	3.58
Housing stock retrofit	6%	13%	22%	20%	25%	15%	3.52
New communities	4%	12%	26%	21%	15%	23%	3.42

Related to resources, one respondent highlighted 'Government funding for climate change action and specifically retrofit is not fit for purpose, with stop start schemes and local authorities needing to compete for funding pots with short deadlines. Closer working between central and local government would be beneficial, as the latter are closer to communities.'

Respondents considered that the topic that is the least affected by under-resourcing is reducing inequality and injustice. The percentage of respondents that considered under-resourcing a significant or an extreme barrier decreased to 34%.

As shown in Figure 10 on page 29, respondents saw skills as less of a barrier than resources for all the policy topics they were asked about.

Figure 10: The extent to which lack of skills in local authorities is a barrier to effective delivery in each of following planning-related policy topics. 'One' indicates that the factor is not a barrier at all, while 'five' indicates that it is a great barrier (173 respondents)

	1	2	3	4	5	N/A	Weighted Average
Urban design and aesthetics	5%	18%	32%	23%	17%	6%	3.31
Health and wellbeing	6%	20%	38%	22%	9%	5%	3.08
Climate change adaptation	5%	12%	37%	29%	13%	5%	3.36
Climate change mitigation	4%	13%	40%	26%	13%	5%	3.32
Green space/infrastructure	9%	22%	40%	18%	6%	5%	2.89
Housing delivery (market)	13%	24%	33%	20%	4%	6%	2.76
Affordable and social housing delivery	11%	26%	33%	19%	6%	6%	2.83
Reducing inequality and injustice	10%	23%	36%	17%	6%	9%	2.86
Local sustainable transport	7%	28%	29%	23%	7%	6%	2.94
Housing stock retrofit	6%	21%	27%	21%	12%	13%	3.12
New communities	5%	17%	29%	20%	8%	21%	3.12

As was the case with under-resourcing, a lack of skills was seen as a barrier to the greatest extent in relation to respondent's ability to tackle climate change adaptation and mitigation. A number of respondents highlighted that, while welcomed, adding policy requirements such as incorporating statutory biodiversity net gain without providing additional funding, skills and capacity was a challenge for local authorities, adding further pressure to officers. Respondents particularly highlighted technical topics such as nutrient neutrality, as well as biodiversity net gain, and commented that their local authority did not have the ecological expertise to maximise the benefits of those policies. The topic respondents considered to be the least affected by lack of skills was affordable and social housing delivery.

National policy and leadership

National level policy continues to be a barrier to effective delivery (see Figure 11 on page 30) and a respondent commented that the uncertainty around the potential reform of the English planning regime is a significant burden on local planning authorities. In practice, this is being reflected in delays with and the withdrawal of a number of local plans as local authorities await further information about potential changes to the calculation of housing requirements.

Figure 11: The extent to which current national-level policy is a barrier to effective delivery in each of following planning-related policy topics, 'one' indicates that the factor is not a barrier at all, while 'five' indicates that it is a great barrier (173 respondents)

	1	2	3	4	5	N/A	Weighted Average
Urban design and aesthetics	9%	19%	29%	18%	18%	7%	3.19
Health and wellbeing	7%	19%	35%	18%	15%	6%	3.18
Climate change adaptation	2%	16%	27%	27%	22%	5%	3.54
Climate change mitigation	2%	17%	25%	25%	25%	5%	3.57
Green space/infrastructure	7%	19%	32%	22%	14%	6%	3.19
Housing delivery (market)	12%	16%	31%	16%	19%	6%	3.14
Affordable and social housing delivery	6%	11%	30%	19%	28%	6%	3.55
Reducing inequality and injustice	8%	16%	35%	17%	16%	9%	3.18
Local sustainable transport	5%	16%	31%	21%	21%	6%	3.4
Housing stock retrofit	7%	12%	29%	17%	21%	14%	3.37
New communities	5%	9%	36%	14%	13%	22%	3.27

Respondents considered that national policy was the biggest barrier in relation to delivering affordable and social housing and climate change adaptation and mitigation. Local sustainable transport and retrofitting the existing housing stock came fourth and fifth, both of which are crucial to tackling climate change.

These findings reinforce the ideas discussed earlier in the report that argue that current national level policy is not strong enough to support the climate change targets set out by local authorities. There are concerns, not only by the lack of support at the national level, but by the fact that national policy often curtails the ability of local authorities to go further. Comments from respondents included:

'Planning laws on a national level are out of line with the aspirations of local authorities to reach net zero. Local communities, councillors and local authorities should have far more influence... The reality is national planning is contributing to big poor quality, profit led, non-environmental builds that lack infrastructure and often public support where profit is placed above all else to meet targets.'

As would perhaps be expected, national political leadership was seen as a similar barrier to national policy. It was seen as the biggest barrier in relation to affordable and social housing delivery. Climate adaptation and mitigation, local sustainable transport and the delivery of new communities were also considered to be barriers.



Figure 12: The extent to which national political leadership is a barrier to effective delivery in each of following planning-related policy topics, 'one' indicates that the factor is not a barrier at all, while 'five' indicates that it is a great barrier (172 respondents)

	1	2	3	4	5	Weighted Average
Urban design and aesthetics	10%	18%	36%	19%	16%	3.12
Health and wellbeing	9%	19%	37%	15%	20%	3.19
Climate change adaptation	8%	18%	30%	18%	26%	3.36
Climate change mitigation	7%	17%	30%	20%	25%	3.38
Green space/infrastructure	7%	19%	34%	20%	20%	3.25
Housing delivery (market)	13%	19%	31%	19%	19%	3.12
Affordable and social housing delivery	6%	10%	33%	22%	28%	3.55
Reducing inequality and injustice	8%	17%	34%	17%	24%	3.31
Local sustainable transport	7%	16%	31%	24%	21%	3.37
Housing stock retrofit	9%	18%	30%	17%	26%	3.32
New communities	5%	16%	39%	17%	23%	3.37

The respondents also recognised that national leadership was less of a barrier in relation to the delivery of market housing and urban design. In line with similar findings last year, this could be caused by the English Government's campaign for design, backed by the publication of the *National Model Design Code*, and strengthening of language on design in the NPPF.



4. Case studies

4.1 Swansea Council – Building better homes through the ‘Swansea Standard’

What Swansea Council is doing to meet net zero targets in the delivery of housing

Swansea Council is the largest stock holding local authority in Wales with 13,600 council homes. They have invested over £0.5 billion in Welsh Housing Quality Standard which will have an impact on improving the energy efficiency of the homes, but they recognise this will not enable homes to reach net zero and so further investment is required. They estimate this investment to be a minimum of a further £600 million.

Most significantly in relation to new homes, the Council has developed the Swansea Standard, this is explored further below. The Council is also looking to measure both the upfront and embodied carbon in new developments, ensure that material choices reflect this, as well as ensuring that this is communicated to the supply chain. They will keep reviewing and monitoring the Swansea Standard, including the heating and hot water systems to ensure the best performance and efficiency is achieved. This technical innovation looks at how the region can grow the supply chain and the market for innovative low carbon homes, to make Wales a leader in low or zero carbon housing construction.

Retrofitting existing homes is a challenge for the Council. The next four years will see £28 million investments in solar and battery storage, integrated into the ongoing fabric improvements to maximise thermal performance of the whole building envelope. The final part of the decarbonisation strategy will be to roll out low carbon heating and hot water systems such as air source and ground source pumps.

Key facts about the Swansea Standard

The ‘Swansea Standard’ is a carbon-conscious whole-system build approach, developed by Swansea Council, which reduces operating energy and CO₂ emissions over a building’s lifetime. The construction form is a ‘fabric-first’ approach – focussed to achieve at least a 25% improvement above the thermal performance prescribed in current Building Regulations (2013). The thermal envelope consists of a highly insulated timber-frame with integral components of high-performance doors and triple glazed windows. This ensures high thermal values, low air-leakage, reduced space energy heating demands and emissions – the timber-frame itself supporting CO₂ ‘sequestration’.

Figure 13: Photos of developments delivered to the Swansea Standard. Source: Swansea Council



How the Swansea Standard was developed

The Swansea Standard was developed following Swansea Council's initial Passivhaus pilot scheme in 2017, which was the first new build housing project delivered internally in a generation. During the initial pilot scheme, the Council realised that there was a great carbon footprint associated with using Passivhaus accredited materials and approved services. For example, timber frame had to be sourced from Ireland, insulation from the Czech Republic and insulated floor slabs from Cornwall. In turn, this impacted local supply spend, which meant that Swansea Council was not meeting its responsibilities embedded within the Well-being of Future Generations (Wales) Act.

A series of workshops with key members of staff were pursued, with the premise of tackling fuel poverty as a key aspiration putting the 'fabric first' view at the forefront. As a result, it was agreed that the buildings should perform at a constant of 25% uplift of standard building regulations and 100% improvement on air tightness.

In addition to the thermal improvements, the Swansea Standard is combined with innovative technologies to create Homes as Power Stations (HAPS). These homes all have Ground Source Heat Pumps (GSHPs), PV solar roofs, battery storage and Mechanical Ventilation Heat Recovery (MVHR) Systems and will be able to store and use their own energy. Swansea Standard construction now delivers approximately 80-85% spend on materials and services within a 30-mile radius.

The performance of each home will be monitored by the Welsh School of Architecture. User feedback will assess how comfortable the homes are to live in, as well as monitor and evaluate the building's performance, which is critical to assess how the technology works in the social housing sector and can be rolled out and delivered at scale.

The Council took time to reflect and developed the Swansea Standard from tangible lessons learnt sessions following completion of the Passivhaus pilot, whilst still upholding key political aspirations. As the programme was taking shape, a project team was developed which bridged across Housing and Building service, building trust between the teams, a cross corporate working group (including planning, engineering, network management, drainage, and ecology) was set up. Additionally, a culture of inclusion and openness was instigated promoting communication and feedback.

The key barriers to setting up the Swansea Standard

Cost is a key factor. Whilst Welsh Government Grants to support innovation have been available; this generally applies to renewable energy installation and an uplift for some of the thermal improvement for the Swansea Standard. Swansea Council was successful in all four rounds of the Innovative Housing Programme (IHP). The IHP has now finished, and the Council is aiming to continue developing these standards and working towards achieving net zero carbon. The challenge will be delivering this while not impacting on the number of homes that can be delivered.

Delivery and lack of procurement frameworks set up to deliver house building sub-contract services was also a barrier. Local authority partnering options with SMEs and local provision within the procurement governance should be explored to enable scaling up.

Switching from traditional heating sources to innovative solutions was a big step. However, acceptance and buy-in of the HAPS concept has grown throughout the Council, with careful balance of the project risks, the increased costs and the aspirations to push the innovation and low carbon build agenda.

Concerns that the controls to operate the homes would be too complex to ensure that the tenants get the maximum benefits from their homes have been overcome. By installing very simple controls, and ensuring that

there is ongoing tenant engagement, this problem should be addressed. The house layouts have been designed to accommodate the equipment without compromising storage space for the residents. Training sessions for staff and tenants are also carried out and are refreshed at visits or on request.

How the Swansea Standard was resourced

The first Swansea Standard schemes were developed as part of a small pilot development programme to test the Council's approach to delivering housing. The schemes were funded via Welsh Government's Affordable Housing Grant and Innovative Housing Programme. Their Cabinet have since approved a target to develop 1,000 homes over the next 10 years, using HRA borrowing and Welsh Government grants.

There is also a More Homes Development team within the Housing Service to manage the overall development programme, commission schemes, enable land to be brought forward and set standards and specifications.

Swansea Council is a local authority that took a conscious decision to retain its direct labour services many years ago. As part of the services succession planning methodology, age profiling and medium-term business planning, was developed alongside apprentice recruitment.

Swansea Council's award-winning apprenticeship program and close link with local further education colleges have ensured training is tailored to innovative construction methodology, learning directly from the projects manufacturers and installers. It is estimated that the apprenticeship programme will provide an approx. 55 – 60% replacement of its ageing workforce.

How other local authorities can replicate the project

- Deliver with internal resource where possible – ensuring cost and quality control.
- Getting the right sub-contractors is key – lack of specialism is sometimes evident.
- Do not underestimate the resources needed for tenant engagement and monitoring of new homes when using non-fossil fuel systems – they are different!
- Develop visible lines of synergy between political aspiration and tangible officer outcomes.

4.2 Glasgow City Council – Passivhaus retrofit and planning for climate change

Overview of Glasgow City Council's work on climate change through housing and planning

Glasgow City Council and its partners are investing in a low-carbon infrastructure that will be future and climate-proof, providing good-quality, low-carbon and affordable housing and energy; seeking to unlock low-carbon retrofits and buildings that are fit for the future. The city has already exceeded its target of reducing CO₂ emissions by 30% by 2020, achieving this goal by 2015, through a combination of energy efficiency and local generation. The city recognises that there needs to be a sharp increase in the scope, scale, and intensity of delivery of projects to set Glasgow on course to achieving its net zero carbon goal for 2030.

There are an estimated 430,000 homes in the Greater Glasgow region that need to be retrofitted with alternatives to gas heating and with better insulation, including around 70,000 of the city's pre-2019 tenements. The Council will work to reduce their emission footprint via a series of building rationalisation and retrofitting measures, which will see carbon reductions in the order of 50% from current levels. Thereafter larger-scale, bespoke actions will be required.

Policy is evolving to support their transition to net zero for housing, transport, energy, and nature-based solutions. Furthermore, they are gathering evidence on embodied carbon of existing property; with carbon analysis expected to inform decisions of proposed demolition and subsequent rebuilt of structures and fabric;

together with a net zero approach to renovating their industrial heritage and conservation areas. There will also be consideration of environmental audits of future planning applications together with guidance on the circularity of construction materials.

The role of planning in delivering climate change goals

Glasgow City Council has declared its ambition to be a Carbon Neutral City by 2030 in its Climate and Ecological Emergency Plan (2021)⁴⁶. Planning has a critical role in their journey to Net Zero to be ambassadors and advocates of a just and equitable transition. This will be underpinned by the Scottish National Planning Framework 4⁴⁷, which will have a direct effect on their approach and the direction of the new City Development Plan.

The new City Development Plan will seek to mitigate climate impacts through the design decisions. It will set out several actions on the measurement of Whole Life Carbon and their approach to Net Zero Development with a focus on environmental stewardship being their top priority. They will also need to lead by example through retrofitting the Council's assets and influencing the uptake of zero carbon retrofit across the city.

Climate change policies in the local plan

The existing City Development Plan (published in 2016) is centred around two overarching policies, CDP1 The Placemaking Principle and CDP2 Sustainable Spatial Strategy, which are supported by a number of environmental policies including, but not limited to, supplementary guidance on resource management and the natural environment⁴⁸.

The city will bring about their just transition through action, which will be included in the emergence of key strategies for leading the way to a net zero carbon future and in the new City Development Plan (Local Plan). Strategies under development include: The Carbon Management Plan (CMP3), which will set out how the city's own estate can contribute to the achievement of carbon neutrality by 2030; the city's first Local Heat and Energy Efficiency Strategy (LHEES), which will present ambitious targets for absolute carbon reduction across the built environment in the city; and The City Development Plan (CDP2) which will seek to facilitate those actions that will enable the city to meet the net zero carbon target and help build climate resilience through our land use policies.

The Climate Plan and its effect on the delivery of housing

Glasgow is Scotland's most renowned post-industrial city. It is the metropolitan centre of a unique and diverse regional housing system which has changed significantly over the past quarter of a century. There are unique opportunities and challenges linked to Glasgow's built heritage and industrial legacy. Glasgow's Housing Strategy addresses the key issues set requiring higher costs technical specifications for works, housing valuations, comparative households' incomes within target areas and grant benchmarks.

A key priority is to maximise the additional funding and resources that can be leveraged through the Home Energy Efficiency Programmes Scotland: Area Based Schemes (HEEPS: ABS) grants, such as Energy Company Obligation (ECO). However, it is challenging where owners are not able or not willing to make a significant

46 *Glasgow's Climate Plan*. Glasgow City Council, June 2021 <https://www.glasgow.gov.uk/CHttpHandler.ashx?id=50623&p=0>

47 The National Planning Framework 4 (2021) states that to achieve a net zero, nature-positive Scotland, the planning system must be rebalanced so that climate change and nature recovery are the primary guiding principles for all their decisions. The framework reinforces a place-based approach, with people and place at the heart of the Net Zero transition. More information: <https://consult.gov.scot/local-government-and-communities/draft-national-planning-framework-4/>

48 Available at <https://www.glasgow.gov.uk/CHttpHandler.ashx?id=36873&p=0> and <https://glasgowgis.maps.arcgis.com/apps/webappviewer/index.html?id=f8a6a37c9c324f268f896dd59fcd6477>

financial contribution. There are also eligibility restrictions on HEEPS: ABS grants for private landlords. Developing viable and deliverable finance packages for investment in improving the sustainability of existing housing is a key challenge set out in the Scottish Government's Housing Strategy, *Housing to 2040*⁴⁹, with a focus on delivering affordable and sustainable housing that can meet the needs and demand of Glasgow's people.

This includes new supply of high quality low and zero-carbon homes to meet the 'Glasgow Standard' as well as an emphasis on meeting the challenges associated with holistic, whole building approach to investment and improvements to existing homes, particularly older tenements, to make them low and zero carbon fit for the future. A key issue is resources and financing available for investment in existing homes. The HEEPS: ABS is a national fund that is allocated to local authorities based on a distribution formula that applies weighted measures for fuel poverty, building attributes, and other factors. Glasgow receives a significant allocation due to its comparative deprivation and incidence of low-income households as well as extensive, non-traditional, and solid wall construction housing types, including tenements. Glasgow City Council has a successful track record of engaging private households, as well as Registered Social Landlords, to deliver HEEPS: ABS projects in target areas across Glasgow. Projects are delivered in partnership and with consent of private owners, who are required to make a financial contribution. The projects must balance a combination of non-traditional construction types.

Building on the valuable work that the city and its partners have been developing over the years, the City Council has commissioned a 'scoping study to net zero'. This will pave the way for future work where energy planning, land-use planning, housing planning, and mobility planning are integrated, ensuring that the city achieves its net zero carbon target by 2030. This work is being undertaken by Energy Systems Catapult and will look at ways to support local energy schemes, allowing access to sustainable and renewable energy sources.

Work will also be undertaken to address historic buildings and ensure they are resilient to the impacts of climate change through a process of risk analysis in line with recommendations of Historic Environment Scotland. The city will engage with local developers, landlords and residents to reduce the carbon footprint associated with our own buildings, ensuring that all Glaswegians have access to clean and affordable energy. These actions are key to help mitigate the impact of the high level vision for a decarbonised, decentralised, and digitised built environment. Currently in development, this strategy will include an ambitious new target for an absolute carbon reduction; it will bring together key priorities around city wide carbon reduction and housing priorities reflecting the urgent need to reduce fuel poverty and increase energy efficiency of domestic and non-domestic buildings, it will include reviewing the need for an Energy Services Company. This plan and the first of its kind Local Heat and Energy Efficiency Strategy (LHEES), will both support Glasgow's ambition of becoming a cooperative city, through alignment with the circular economy principles and a framework of engagement with local energy co-operatives, enabling them to be set up and providing support.

Passivhaus developments

Glasgow City Council's Housing and Regeneration Services, together with partners from across housing associations, the private sector, and universities, are delivering Passivhaus developments around Glasgow. Passivhaus is a standard of energy-efficiency in building, meaning that reduced heat loss in a home result in central heating being unnecessary. Examples include:

A Passivhaus retrofit of a pre-1919 tenement block being undertaken by Southside Housing Association, CCG, John Gilbert Architects, Glasgow University (CaCHE) and Glasgow School of Art (MEARU). This project involves refurbishing a typical (eight flat) Glasgow inner-city sandstone tenement to a standard that tests the cost and efficacy of different comprehensive treatments.

A 90-unit development in Dundashill that is being delivered by West of Scotland Housing Association. The homes will be built to Passivhaus standards with the aim of being zero-carbon.

49 *Housing to 2040*. Scottish Government. March 2021 <https://www.gov.scot/publications/housing-2040-2/>

The refurbishment of three high-rise towers in Woodside by Queens Cross Housing Association, which aims to meet the EnerPHit standard of Passivhaus-retrofit. These towers, built in the 1960, have been wrapped externally in Rockwool and finished with a self-cleaning render, and have had their balconies externally insulated and enclosed with triple glazing. This is in addition to the internal installation of mechanical ventilation and heat recovery units, which purify the air with high-grade filters.

Figure 14: Glasgow's Tenement EnerPHit Passivhaus Retrofit project. Source: Glasgow City Council



Evaluating the approach taken in Glasgow

Political leadership and support were key to secure resources and funding. The Council declared a climate and ecological emergency and the development of the Climate Plan was politically led. Other key drivers were national and international policy drivers, and a collaborative approach to developing the plan and facilitate knowledge exchange/ information sharing. Key barriers to implementation were mostly in relation to resourcing and monitoring progress.

Collaborative action planning was helpful in securing support and enabling collective ownership of action. The Climate Emergency Liaison Group is a valuable and informative alliance between council services and council officers. The Climate and Ecological Plan evolved from the recommendations set out by councillors and city stakeholders in both the Climate Working Group and the Ecological Emergency Working Group. The proposed actions, together with a review of how the city is currently responding to the climate emergency; and a route-map to 2030 of what we would like to accomplish, completed the plan, and outlined the timescales. The Plan will be monitored and updated yearly.

4.3 Salford City Council – Operating within a cross boundary environmental vision

Salford City Council is making climate change an overall priority in the delivery strategy of their local plan. It was named the most sustainable council in North West England in 2019 by Friends of the Earth and the Centre for Thriving Places named it the greenest and most sustainable council in England and Wales.

Context

The *Greater Manchester Combined Authority Five-Year Environment Plan 2019-2024*⁵⁰ was launched in March 2019 and sets out their long-term environmental vision to become carbon-neutral by 2038, and the urgent actions that need to be taken to help achieve it. To inform the Plan, research was carried out in 2018 to calculate what this would mean for Greater Manchester. It concluded that in order to reach carbon neutrality by 2038, they needed to initiate a programme of mitigation delivering an annual average of 15% cuts in emissions. The priorities for homes, workplaces and public buildings include reducing heat and cooling demand by 22%, with a 10% reduction by 2025 per year, as well as retrofitting tens of thousands of homes a year.

Governance

Within Salford City Council the Elected Members and City Mayor are very committed to delivering the Greater Manchester Combined Authority Five-Year Environment Plan; it is seen as their climate change action plan and they base their activities upon this, rather than reinventing their own. The relationship with Greater Manchester is really important in providing strategic targets, as opposed to being directive. It is not viewed as a hierarchy but more of a partnership, and they have a long history of working together. Addressing climate change and adding social value are corporate priorities within Salford, and they embed climate change within the culture of the local authority, which has had a real impact on what they have achieved.

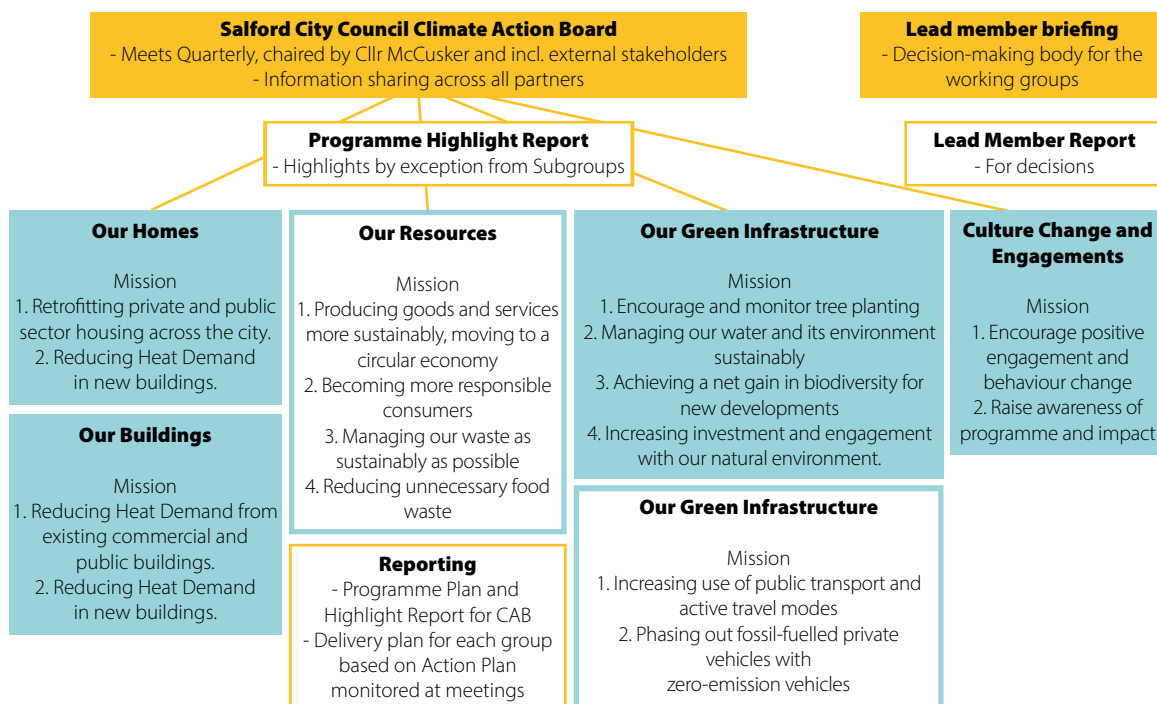
The Salford City Council Climate Action Board was established to bring together stakeholders from across the Council and external organisations to oversee projects and programmes associated with meeting the city's carbon neutral target⁵¹. The Board, which is chaired by an Elected Member, meets quarterly and the existence of the Board allows the Council to focus and develop action plans through sub-groups (currently on homes, buildings, green infrastructure and culture change and engagement). Each sub-group has a delivery plan which sets out targets from the Greater Manchester five-year plan and has a wide membership of key stakeholders in Salford not just the City Council. Progress is reported back to the Climate Action Board quarterly.

50 *5-Year Environment Plan for Greater Manchester 2019-2024*. Greater Manchester Combined Authority, Mar. 2019. https://www.greatermanchester-ca.gov.uk/media/1986/5-year-plan-branded_3.pdf

51 *Salford's Climate Action plan*. Salford City Council, Mar. 2019 <https://www.salford.gov.uk/your-council/climate-change/salford-s-climate-action-plan/>

Figure 15: An overview of Salford City Council's zero carbon governance and aims: Source: Salford City Council.

SCC – Zero Carbon Governance and Aims



The team driving the climate change projects

Salford City Council has an investment team within its regeneration division. This includes project delivery managers and a mix of other skills which is really important – it is not about having climate change officers who operate in a silo but being able to bring in colleagues from other teams such as property and fleet to try and mainstream the delivery projects related to zero carbon and climate change. The key attribute of the team is that they understand about getting funding for different projects. They maintain a pipeline of projects that are ready for the next funding opportunities.

Green projects in Salford include:

- 2,526 solar panels are being installed on 21 public buildings. A 5,000 panel solar farm being built on land in Little Hulton will generate enough power for more than 430 homes each year.
- A hydro weir in Charlestown will use the flow of the River Irwell to generate power for 200 homes a year.
- £126 million has been invested in green spaces, creating new country park and walking and cycling routes across the city.
- 12 new electric vans are now being used in council areas such as recycling collection monitoring, fly-tipping investigation and enforcement; dog, animal and pest welfare and control.
- 417 new affordable eco-homes are being built through our own housing company.
- There are approximately 15km of off-road and on-road segregated cycle routes – along with more than 20km of shared footways and on-road markings for cyclists.
- The Kersal Wetlands storage basin reduces the risk of flooding for 1,400 homes and 500 local businesses. It can hold enough water to fill 268 swimming pools.

Figure 16: Solar panels installed on Worsley Leisure Centre, Salford. Source: Ben Nuttall, NPS Energy.



Commitment in the local plan

Following the examination of the Local Plan⁵² in December 2021, the most recent version of the Local Plan contains the Council's energy policies and overarching climate change policy. A key policy is that new developments will need to be zero carbon from 2028, going above current requirements in building regulations. They also have strong policies on adaptation; design and green infrastructure and flood risk and identifies areas for renewables. As part of its evidence base for the submitted Local Plan, the council has published a *Renewable and low carbon energy opportunities background report* and *Zero net carbon and carbon neutrality background paper*⁵³. The leaders of the Council are also pushing for the council-owned housing company, which aims to provide decent social housing, to achieve the zero carbon target before 2028 using a 'fabric first' approach.

Challenges and opportunities

Salford are in a fortunate position in that they have a 9.7 years housing land supply – this means they can focus on climate change, rather than just housing delivery. However, funding is a key challenge. Greater Manchester look at central government funding opportunities on their behalf which is very beneficial but the time they have to respond to competitive bids is very limited and resource intensive. They believe it would be helpful if central government funding opportunities were more predictable. The Council could put more resource in to creating a pipeline of projects if they knew what the pipeline was. Otherwise, it tends to be 'easy wins' which are more likely to be funded, rather than strategic projects that take time to deliver.

It would be easier for the Council to get to zero carbon if central government set out a clear pathway and put it in to building regulations at a national level. In addition, retrofitting people's homes needs substantial reliable resources over the long term – the Council could make plans to be able to deliver this and develop a pipeline of projects, but they need more confidence in funding.

⁵² The most recent version of the emerging local plan is the publication Salford Local Plan: Development Management Policies and Designations Draft Composite Plan March 2022 containing Main and Additional Modifications (document SCC060). <https://www.salford.gov.uk/planning-building-and-regeneration/planning-policies/local-planning-policy/salfords-development-plan/salford-local-plan/salford-local-plan-examination/>

⁵³ For more information see documents SD060 and SD062: <https://www.salford.gov.uk/planning-building-and-regeneration/planning-policies/local-planning-policy/salfords-development-plan/salford-local-plan/salford-local-plan-examination/submission-documents/>

4.4 London Councils – Retrofit London Programme

Key facts of the programme

In London, 28 boroughs and the Mayor of London have now passed climate emergency declarations, while all 33 London local authorities have either published or been developing a climate action plan. In December 2019 London Councils issued its Joint Statement on Climate Change,⁵⁴ a series of ambitious pledges made by all London local authorities to tackle and avert catastrophic climate change. Among the pledges is an ambition to deliver a programme of home retrofitting to achieve an average Energy Performance Certificate Level B by 2030.

London's housing stock is responsible for around a third of all carbon emissions in the capital, while around 80% of all homes expected to exist in 2050 have already been built. Home retrofitting is therefore imperative for addressing climate change. To achieve the boroughs' EPC B target, and to help coordinate activity across London, they have established the Retrofit London programme.

In October 2021, the Programme published the detailed Retrofit London Action Plan⁵⁵, approved by borough Housing Directors in July, that provides a detailed, cross-tenure, approach to retrofit London's 3.7 million homes. Data analysis undertaken for the action plan highlighted the costs (as at July 2021) involved in delivering retrofit across all of London:

- Scenario 1: c.56% carbon reduction and near average EPC B: Total cost (labour & materials) of £49bn (average cost of £13,000 per residential property affected).
- Scenario 2: Net Zero and average EPC B: Total cost (labour & materials) of £98bn (average cost of £26,000 per residential property affected).

To achieve retrofit on the scale required, a combination of funding sources is required, along with levers to incentivise delivery.

How the programme was developed

The Retrofit London programme was developed in collaboration with all London boroughs and other key stakeholders. The Retrofit London Housing Action Plan was jointly funded by the London Housing Directors' Group, London Councils, Greater London Authority and London Environment Directors' Network. A consortium of consultants, led by Etude, provided technical support and drafting, while Parity Projects provided data analytics, helping to ensure this is a genuinely evidence-led programme. The programme is also finalising an Implementation Plan, which will set out priorities for the first three years of the project.

How the programme affects the delivery of housing

The project will help to support boroughs in their attempts to retrofit properties in their area. It is a cross-tenure approach, setting out measures that can help support retrofit across council, wider social and private sector housing. As highlighted earlier, the programme has released both an Action and Implementation Plan, both documents address the requirements of housing, for example wall insulation and building constraints, along with data to support. They also need to ensure that new build housing is built to low carbon standards, future-proofing the housing stock and ensuring they do not need to be retrofitted post-build, as this will be labour and resource intensive. To this end, London Councils is also supporting the development of an action plan for low carbon development.

54 See <https://www.londoncouncils.gov.uk/our-key-themes/climate-change#:~:text=London%20Councils%27%20climate%20programmes&text=The%20result%20was%20an%20ambitious,implementation%20of%20an%20action%20plan>.

55 *Retrofit London Action Plan*. London Councils. October 2021. <https://londoncouncils.gov.uk/our-key-themes/climate-change/retrofit-london-housing-action-plan?msclkid=93eab1efd11811ec8eda49ef1755c142>

The retrofit and decarbonisation of London's housing stock has many other benefits, including improving people's health; increasing thermal comfort and improving indoor air quality which will have a positive impact on health, especially the vulnerable.

- The International Energy Agency (IEA) and the Organisation for Economic Co-operation and Development (OECD) suggest health improvements might account for 75% of the overall value of improving the energy efficiency of buildings.
- Addressing fuel poverty; Targeted high energy savings will reduce bills and take more people out of fuel poverty, reducing the need for financial support.
- Improving people's wellbeing; Housing Associations' Charitable Trust's (HACT) Social Return on Investment calculator suggests that an improvement of three EPC bands in London improve individual's wellbeing, equivalent to £651 per year.
- Benefitting air quality and supporting society's cost to achieve net zero; there is finite supply and delivery capacity of renewable energy via the grid. The less grid capacity we will need to achieve net zero, the lower infrastructure costs will be.
- Providing a significant source of jobs for the future and economic benefit; there is a fantastic opportunity for job creation in London. Parity Projects estimate that it can create 40,900 full time equivalent jobs for 9 years to get all homes to EPC B by 2030 and achieve 56% emissions reductions. These themes are particularly relevant to a green recovery from Covid-19 and London's Green New Deal mission.

The key barriers to setting up the programme

A major barrier to delivering on this agenda is funding. As highlighted earlier, retrofitting London's 3.7 million properties will cost between £49 billion and £98 billion, depending on which scenario is chosen. The programme must be creative in sourcing this funding, through central government funding, local authority funding where possible and private funding.

Access to skills, as well as sectoral capacity are also problematic. Delivering on this agenda can create over 100,000 jobs in the relevant trades. While this represents a significant opportunity for growing the green economy, it also represents a significant barrier given the need to grow this sector.

Cross-borough and regional government engagement has also presented a barrier. The programme has successfully overcome this challenge to date through our collaborative approach and broad engagement. This work has been spearheaded by the lead boroughs, Enfield and Waltham Forest, who have voluntarily maintained a strong leadership role alongside their day-to-day work.

The sector needs to better 'sell' the benefits of home retrofit to residents. The task of retrofitting properties can seem invasive and time consuming, this can be made worse when retrofitting certain property types, and it is important to ensure that the voices of those who benefited from such works are heard and challenge assumptions that such works are not worth the hassle.

The key drivers that made it work

Local authorities in London have sought to act with ambition in addressing the challenges of catastrophic climate change. This is the key driver behind this programme, and the wider set of ambitions set out in the London Councils' Joint Statement on Climate Change. There is a widely shared belief that retrofit is essential to securing London's zero carbon future and is desperately needed to tackle current concerns around fuel poverty and the costs of living. But to progress this agenda will require significant financial investment in retrofit, as well as work to spread understanding of technical matters and working with the skills sector and relevant trades to help nurture the sector.

The key stages to develop the actions

The programme was developed over two main stages so far. Initially the programme created the Retrofit London Housing Action plan based on extensive engagement and consultation with all 33 boroughs, plus other key stakeholders. The action plan sets out a number of key activities that would be taken forward by the boroughs, as well as eight key principles that are essential to achieving the ambitious programme – see figure 17 below.

The programme is currently finalising an Implementation Plan, setting out a programme of activity for the first three years.

Resourcing the programme

Enfield and Waltham Forest are the lead boroughs for the programme and their staff have been working with London Councils to develop this work. Development work was jointly funded by a range of stakeholders as outlined above. Delivery of the project in an operational phase will be jointly funded by borough subscriptions, while external funding will also be sought.

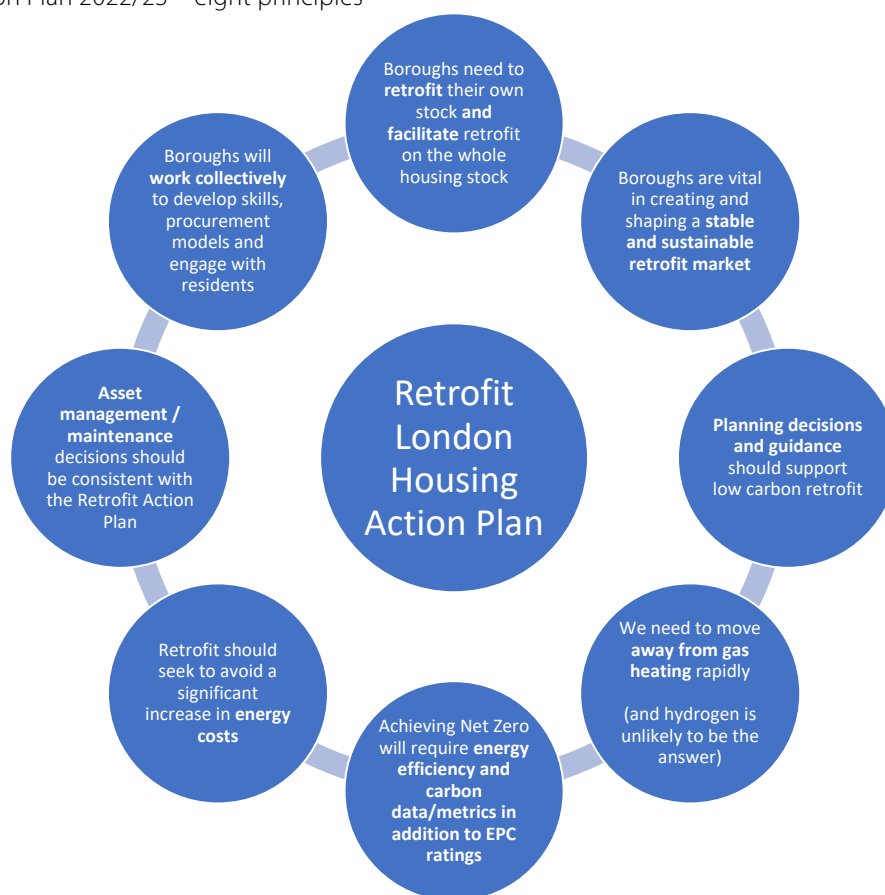
How other local authorities can replicate the programme

The Retrofit London Programme was made possible only through collaborative partnership working with a wide range of bodies – both public and private. Retrofitting is an expensive and time-consuming endeavour and similar programmes have to be creative in sourcing funding, through central government, local authority and the private sector. Selling the benefits of retrofitting to residents is also key to the success of the programme.

The Retrofit London Action Plan, and the Retrofit London Housing Implementation Plan 2022/23 frame the objectives and potential programme blockers, whilst outlining the steps the programme will take to achieve these objectives. It provides a blueprint for developing such strategies that can be taken forward by local authorities and will be of particular interest to councils in combined authority areas, or who want to work in partnership to address this shared challenge.



Figure 17: The eight principles of the Retrofit London Housing Action Plan. Source: Retrofit London Housing Implementation Plan 2022/23 – eight principles



4.5 Northumberland County Council – Delivering a Climate Action Plan in a rural setting

Northumberland County Council is a largely rural unitary authority in North East England, with a population at the 2011 census of 316,028, making it the least-densely populated county in England. Northumberland County Council has a climate action plan goal of reducing the Council's own emissions by 50% by 2025 and reducing the county of Northumberland's emissions to net-zero by 2030. They have a dedicated Climate Change Team who work across the Council and are now consultees for major planning applications.

Governance

Within Northumberland County Council there is a thematic Climate Change Policy Group coordinated by the Service Director for Climate Change, Business Intelligence and Performance. This brings together service directors and managers from across all relevant council services. The Council has established a Climate Change Team in recognition of the need to effectively resource the broad spectrum of work involved in both developing the strategy and action plan and its implementation. The team are working across the Council including in respect of capital projects and the delivery of housing.

There are regular meetings between representatives from the planning and the climate change teams to discuss matters as they emerge – this ranges from policy and guidance matters to project delivery issues.

The role of planning in delivering climate change goals

Northumberland County Council has just adopted its Local Plan⁵⁶. While the Plan was submitted some time before the Council adopted its Climate Action Plan, climate change is a key feature of the plan and a key underpinning objective.

Policy STP 4 sets out how development proposals should contribute to climate change mitigation and build resilience to the effects of climate change. This is a strategic policy supporting development that mitigates climate change with consideration given to issues including the location and layout of development, reducing the need to travel for both people and goods, and encouraging sustainable modes of transport including walking, cycling and the use of public transport, as well as reducing energy consumption and incorporating decentralised, renewable and low carbon energy. Other policies throughout the plan set out more detailed policy requirements to mitigate and build resilience to climate change, for example a policy on sustainable design and construction.

The council is committed to producing various Supplementary Planning Documents (SPDs) in support of the Local Plan. One will be around renewable energy and they plan to have an SPD on design, or potentially a series of SPDs on locally based design. They are also looking to produce various forms of informal guidance to help householders and other relevant audiences with common projects such as electric vehicle charging points and ground source heat pumps.

The council is looking to produce guidance to help the general public help navigate the planning system and understand planning requirements associated with proposed sustainability measures in terms of planning approval, permitted development rights and how the planning service can assist. They are also reviewing their pre-application service and as part of this considering how they can best advise households with carbon reducing measures. In addition, Northumberland are interested in helping those with historic homes to find appropriate solutions to reduce carbon and may similarly produce informal guidance or communications including signposting to Historic England guidance.

The Council's Climate Action Plan

In January 2020, Northumberland County Council published its *Climate Commitment Action Plan 2020-21*⁵⁷ to set the foundations of their climate change programme, which then shaped what would become the full Climate Action Plan published the following year. The Climate Commitment Action Plan enabled the organisation to outline key climate commitments that would reduce emissions across the county, modelled on the highest emitters including heat, transport and electricity generation.

To set a net zero target, it was imperative to have an overall figure of their total emissions in the county to measure our progress towards net zero. By combining their positive and negative emissions they arrived at a grand total of 709.1 ktCO₂ emitted in 2018. This is the figure by which emissions must be reduced to become a net-zero, or carbon-neutral county.

Reaching net-zero emissions will require a significant reduction of their positive emissions whilst also protecting and enhancing their negative emissions from forestry and restoration of peat bogs.

To develop the actions within the Climate Action Plan, a Business Intelligence evidence-based approach was used to determine the highest emitters in the county. As a rural and northerly situated county, it is no surprise that energy and transport were within the sectors with the highest emission output.

Alongside crunching the numbers, the plan was developed using local knowledge and experience which meant a portfolio of projects that target immediate and long-term results started to emerge.

As a result, an in-depth understanding of the issues facing Northumberland in terms of its contribution to climate change has now been developed within the organisation and a robust governance structure with dedicated resource is now in place.

56 Available at <https://www.northumberland.gov.uk/Planning/Planning-policy/Policies.aspx#adoptedlocalplan>

57 See <https://www.northumberland.gov.uk/Climate-Change/Climate-Change.aspx> for more information.

While local authorities are directly responsible for only two to five per cent of local emissions, through their policies and partnerships they have strong influence over more than a third of emissions in their area⁵⁸. Therefore, it is important to note that fundamental to the delivery of this Action Plan will be a county wide change in mindset and behaviours, which will only be possible through effective and far-reaching engagement and partnerships with residents, communities, businesses, visitors and central government.

Resourcing the Climate Action Plan

At first, council capacity and resources were a key barrier in the creation of the Climate Action Plan. Since the publication of the Plan, Northumberland County Council has established a Climate Change Team in recognition of the need to effectively resource the broad spectrum of work involved with implementing the action plan and any further iterations of Climate Strategy towards becoming a carbon neutral county by 2030.

Ambitions to finance the Climate Change Action Plan are enabled through a mixture of National grant funding (Green Homes Grant, Green Heat Network, Local Authority), European funding (the European City Facilities) and capital spending where there is no grant funding available to facilitate (for example investment of solar PV on Council owned estate).

Political support within the Council

The Leader of the Council is the chair of the Climate Change Working Group and therefore the Climate change agenda is very much a political priority. They are integrating a Carbon Impact Assessment into all new policy and project proposals to consider the repercussions of a new development towards their net zero target.

The need to increase climate change awareness within the organisation has been recognised by the Council Cabinet, who agreed that an 'Introduction to Climate Change' module should be included as part of mandatory training – the training was updated to include this module in April 2022.

Additionally, the Climate Change team is responsible for rolling out monthly Carbon Literacy sessions to engage employees about climate change and sustainability initiatives that could be undertaken within their role. This helps to raise awareness of climate change science, local climate change impact, solutions and the Council's climate change targets. This training has been successfully implemented and has received good feedback; they are also offering team specific sessions which are more tailored towards department emission reduction actions/outputs.

Advice for other local authorities

Obtain emission data: The Northumberland County Council Climate Change Action Plan was data driven therefore, it was important to obtain accurate positive and negative emission information from sectors across the county to set a base year to work against.

Consider local geography, resources and opportunities: Northumberland has vast natural resources, already absorbing more carbon than any other English county and with the potential to sequester far more, whilst supporting nature. The North East of England has a rich industrial history, Northumberland has an existing network of abandoned coal mines which can be utilised as a geothermal heat store and provide renewable heat to power modern district heat networks. This could provide a significant opportunity in many of Northumberland's historic mining towns. In other towns, alternative potential renewable and low-carbon energy sources include solar thermal and geothermal heat and waste heat from industry and commercial buildings.

Consider the needs of local residents: how can the climate change mitigation strategies put into place improve the livelihoods of local communities while reducing emissions to create an inclusive, sustainable future which is fair for everyone.

58 *Local Authorities and the Sixth Carbon Budget*. 2020. Climate Change Committee. <https://www.theccc.org.uk/publication/local-authorities-and-the-sixth-carbon-budget/>

5. Reflections and recommendations

The research underpinning this report shows that many local authorities are ambitious and keen to tackle climate change and set strong targets to achieve net zero. The case studies also illustrate some specific examples of where local authorities across the four nations are achieving ambitious targets and setting up successful initiatives. However, we also know, as highlighted starkly in the Sixth Carbon Budget, that we need to go further and faster if we are to secure the changes needed to hit emissions targets and enable places to be more resilient to the challenges our changing climate is already presenting.

As outlined in the analysis section, 85% of respondents said their local authority declared a climate emergency and many have set out targets to reach net zero by 2030. However, respondents also highlighted concerns about how to achieve those targets. This section of the report highlights some key reflections and lessons from the research for local authorities. It also makes recommendations to national governments about what needs to change if local authorities are to deliver the essential changes necessary in relation to climate mitigation and adaptation.

Holistic approaches are essential

Planning can be transformational, and it has a critically important role in reducing carbon emissions and supporting places to be more resilient. Housing policy is also essential in light of the emissions from housing stocks. However, as illustrated in cases such as Northumberland, where the Council has adopted a county-wide approach to influence wider emissions through partnerships with residents, communities, businesses, visitors and central government, tackling climate change cannot only be the role of planning departments, climate change officers or Lead Members for climate. As the APSE Local Government Commission 2030 highlighted, councils have a role as 'stewards of place' and this holistic, coordinating role is vitally important in relation to climate, but also in terms of meeting the wider needs of residents.

The importance of elected members prioritising climate action and encouraging officers to be ambitious and innovative came through strongly at the roundtable. Tackling climate change must, therefore, be a corporate priority for the whole authority, with buy-in across elected members and all departments and a clear vision for what a climate-friendly future looks like. This is being achieved in many local authorities through cross-cutting climate change plans and road maps. Planning and housing are tools to support delivery of that priority, but not the only tools.

Governance arrangements are also, therefore, important to consider. As illustrated by the Salford case study, the development of a Climate Action Board, which brings together stakeholders from across the council and relevant external organisations can help to support an integrated approach. This also highlights the important role of stakeholders outside of the local authority. As the London and Glasgow case studies highlight, public-private partnerships are particularly essential in relation to retrofit programmes.

Adaptation not just mitigation

Across all of the policies relating to mitigation and adaptation, the most likely to be included in a development plan related to promoting active travel (86%). This is positive and potentially supports priorities relating to both climate and health. Overall, six policy areas relating to mitigation were included in 50% or more of plans. While only two relating to adaptation were included in 50% or more of plans. In relation to adaptation, perhaps the most notable response was that only 36% of plans include policies relating to high temperatures and over-heating.

The impacts of climate change are already being felt and seen and an important part of local plans must be to support places to be more resilient in the face of our changing climate. While a focus on mitigation is perhaps understandable in light of the emphasis in national policy around net zero, adaptation must not be overlooked.

Going even further

Continuing to draw on the data relating to local plan policies, more thought also needs to be given to including and implementing policies that may be challenging but will be critically important in achieving net zero and more resilient communities. For example, the vast majority of respondents have declared a climate emergency and over 70% of respondents highlighted that their local plans have policies relating to active travel, promoting public transport, promoting renewable energy and reducing carbon emissions. However, only 25% have binding net-zero standards for new development and 16% have policies relating to limiting and/or ending fossil fuel extraction (although it is noted that there are differences in national fossil fuel extraction policies across the four nations so some local authorities may not need to replicate national policy).

As recognised in Section 3.3 on page 21 (and below), there has been some confusion about whether or not local plans can set policies that go beyond requirements in building regulations in relation to energy efficiency. If local authorities want to meet their ambitious climate targets they will need to go further and faster than national policy. And as highlighted in this report, they can. To achieve that they will also need to engage constructively with a wide range of stakeholders, including the community and developers.

Where relevant, local authorities should also be looking to include local plan policies that would bring a managed end to the extraction and use of coal.

Where local plans are in place and up to date, it is then critically important that all local authorities recognise greenhouse gases and the need to adapt to climate change as a material consideration in planning decision-making. The results of the survey highlighted that 29% and 37% of respondents 'strongly agreed' that their local authority did, but 51% and 52% could only 'agree to some extent' that these issues were material considerations. If local plan policies are to be meaningful, these issues must be material considerations in every decision. As noted in Recommendation Five on page 50, this also needs to be supported by action at the national level.

5.1 Recommendations for national governments

As the Climate Change Committee's report, *Local Authorities and the Sixth Carbon Budget*⁵⁹, highlights, emission reduction targets will only be achieved if national Governments, regional agencies and local authorities work together. This recognition is echoed in the Westminster Government's *Net Zero Strategy: Build Back Greener*⁶⁰, which also recognises that while 'excellent work' is underway, there remain significant barriers to maximising place-based delivery on net zero, and that some places are 'moving faster than others'. Action is required to remove or help tackle those barriers. The following recommendations would enable local authorities to better undertake that essential role.

Recommendation One – Local authorities need to be sufficiently resourced to enable them to undertake their planning function and transform places holistically. This includes in relation to their important role of working with local communities, businesses, and stakeholders to engage them in a vision for a low carbon, climate resilient future that meets people's needs. However, as the survey has highlighted, more local authorities are looking to deliver affordable housing through direct delivery, and as the case studies illustrate,

59 *Local Authorities and the Sixth Carbon Budget*. Climate Change Committee, Dec. 2020. <https://www.theccc.org.uk/publication/local-authorities-and-the-sixth-carbon-budget/>

60 *Net Zero Strategy: Build Back Greener*. HM Government, Nov. 2021. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1033990/net-zero-strategy-beis.pdf

local authorities also know they need to prioritise retrofitting the existing housing stock. These interventions are important. More demands or expectation cannot, however, continue to be placed on local authorities without sufficient funding and skills development.

This funding should be seen as an investment by central Government. As the London case study highlighted, funding is a major barrier to retrofitting London's 3.7 million properties and it will be expensive, but it also has the potential to create 100,000 jobs in the relevant trades.

Recommendation Two – Governments need to prioritise and support the development of skills both within local authorities and relevant industries to enable the creation of new, and regeneration of existing, places that meet the needs of communities and are future-proofed. Retrofitting homes, creating local plans that will enable the development of resilient new communities, implementing biodiversity net gain and supporting the implementation of new renewable technologies, for example, require different skills and approaches. This should be a core part of seeking to promote the green economy and the levelling up agenda [also see recommendation seven below]. For local authorities specifically, they should be supported to make sure they are planning holistically for complete, compact communities that better enable active travel, include high quality public realm and access to greenspace. Such places have been shown to have multiple benefits for people and the environment. Elements of training and peer to peer support can and are provided by a range of organisations, but this cannot be in place of core, targeted support.

Recommendation Three – While local authorities can and want to be innovative, there is still a need for guidance in some specific areas to support planning for climate change. As responses to the survey highlighted, basic guidance would reduce the risk of inefficiencies and misunderstanding. As noted in the report, one example is the confusion around whether or not local plan policies can go beyond building regulations. The answer to this should be set out in planning policy, not simply government analysis of responses to a consultation.

In addition to that clarity, guidance around minimum targets for carbon reduction could be published. As discussed in chapter three, different approaches and language has been used for carbon reduction targets across local authorities. If the statutory target of reducing emissions by 78% by 2035 is to be achieved, all local authorities need to be working towards this, even if they have not declared a climate emergency.

The other area that should be a priority in relation to guidance is carbon handling and supporting local authorities to develop baseline data against which they can monitor progress towards their targets. As set out in Section 3.2 on page 18, 55% of respondents stated that they have an understanding, 'to some extent'. Guidance should be developed to enable local authorities to fully understand and assess their baseline emissions if the targets they are working to achieve are to be meaningful.

Recommendation Four – As is being seen in Scotland, national planning frameworks need to be established in all four nations that bring together thematic and spatial policies. As noted in chapter two, each of the four nations have different arrangements in relation to national spatial policies and facilitating cross local authority boundaries. Even within countries there are a variety of mechanisms. In England, London has a regional level London Plan and Salford is working within the Greater Manchester Combined Authority. While other areas simply have to rely on the duty to cooperate.

Sub-regional and national plans would provide a vital source of key data on national and strategic growth issues as well strategic constraints. They would synthesise and make transparent the differing national policies which shape local development, allowing local communities, for the first time, to understand what is going to happen to them and what they can do about it. This is particularly important if we are to truly tackle greenhouse gas emissions and deal with the impacts of climate change.

Recommendation Five – Mitigating and adapting to climate change needs to be embedded in the priorities of the Planning Inspectorate in England and Wales, the Planning and Environmental Appeals Division in Scotland and the Planning Appeals Commission in Northern Ireland.

As noted in section 2.1, legislation requires that development plan documents in England should be designed to secure that development and the use of land contribute to the mitigation of, and adaptation to, climate change. However, since that piece of legislation was introduced the Planning Inspectorate has found far too many local plans sound, despite not containing meaningful policies in relation to climate change. The importance of climate change and reducing emissions also needs to be reinforced through all appeal decisions, in order to give local authorities the confidence to place weight on the issue as well.

Recommendation Six – The role of local authorities in relation to housing and planning needs to be recognised at both the national and local levels as central to the levelling up agenda and supported as such. Supporting increases in productivity in some parts of the country that do not support the achievement of net zero are unsustainable. Fuel poverty is a real issue and the development of high quality, energy efficient new homes and retrofitting the existing housing can help address it. Funding and policy needs to reflect the importance of these issues and levelling up funding and priorities need to be targeted to support local authorities to work with national governments to achieve this UK-wide policy priority.

As highlighted in this report, there is a need for more certainty and long-term funding to support local authorities in tackling climate change, securing the delivery of more affordable housing and retrofitting the existing housing stock. Elements of funding must also recognise that the market will not and cannot deliver energy efficient homes in low value areas and bridge that gap in order to prevent the development of homes now, that will need expensive retrofitting in the near future. While innovative approaches to policy are welcome, it is critically important that Building Regulations are updated and funding supports all homes to be of a high quality, including in relation to energy efficiency, and not just those in areas of high land values.

Recommendation Seven – In England, powers that have been removed through the expansion of permitted development rights must be restored to local authorities. This would reflect the emphasis in the Levelling Up White Paper on empowering local leaders and communities. However, it is also essential in order to allow local authorities to masterplan, revitalise high streets and secure funding for affordable housing, green infrastructure and public transport infrastructure through Section 106 agreements and the Community Infrastructure Levy. While re-using existing buildings is important, the survey responses showed that 68% of respondents did not think that Permitted Development Rights will help cut carbon emissions. Powers should be restored to local authorities so that where existing buildings are converted, this is enabled through the planning system.

5.2 Conclusion

Climate change is the greatest long-term challenge facing the world today. As the Glasgow Climate Pact recognises, ‘multilevel action and collaboration’ is vitally important and as the Westminster Government’s net zero strategy acknowledges, many places across the UK have made great strides towards a net zero future. This report shows that targets are being set and action is being taken by the vast majority of the local authorities that responded to the survey. It also shows that innovative approaches are being taken and many local authorities are trying to be ambitious through their role in relation to housing and planning. Not only in relation to net zero, but to seek to address the wider challenges of climate mitigation and adaptation and deliver the high-quality homes and communities that people want and need.

However, to address the scale of the challenges we know exist, ambitious action is needed by all local authorities. This report makes clear that if local authorities across all four nations are to consistently and collaboratively rise to the climate change and address other crucial issues such as meeting the need for affordable housing, then national governments need to take their enabling role more seriously and take urgent steps to better support ambitious action at the local level.

6. Annex: Survey questions and results

The TCPA sent an online survey to the Leader, Chair of Finance, Chair of Housing, Chair of Planning and Chair of Economic Development Committees, the Chief Executive, Chief Finance Officer, Chief Housing Officer, Chief Planning Officer and Chief Economic Development Officer in all local authorities in England, Wales, Scotland and Northern Ireland. All responses were treated as anonymous.

SUMMARY		
England	81%	178
Northern Ireland	2%	5
Scotland	10%	21
Wales	7%	16
	Total responses	220

SUMMARY		
NOC	35%	77
Labour	25%	54
Conservative	30%	66
Independent	2%	5
Liberal Democrat	8%	17
Unknown	0%	1
	Answered	220

6.1 Delivering affordable homes

How would you characterise the need for affordable homes?

Answer	Responses	
England		
Severe	71%	126
Moderate	26%	46
Not substantial	1%	2
Don't know	2%	3
	Answered	177
Scotland		
Severe	50%	10
Moderate	45%	9
Not substantial	5%	1
Don't know	0%	0
	Answered	20
Wales		
Severe	75%	12
Moderate	25%	4
Not substantial	0%	0
Don't know	0%	0
Answered	Answered	16

Northern Ireland		
Severe	25%	1
Moderate	50%	2
Not substantial	25%	1
Don't know	0%	0
	Answered	4

What is the dominant model of delivering social and affordable housing in your local authority area?

Answer Choices		Responses	
England			
Direct delivery	18%	31	
Through the planning process via Section 106 agreements	54%	95	
Joint ventures on council-owned land	8%	15	
Other (please specify)	20%	36	
	Answered	177	
Scotland			
Direct delivery	50%	10	
Through the planning process via Section 106 agreements	5%	1	
Joint ventures on council-owned land	10%	2	
Other (please specify)	35%	7	
	Answered	20	
Wales			
Direct delivery	38%	6	
Through the planning process via Section 106 agreements	31%	5	
Joint ventures on council-owned land	0%	0	
Other (please specify)	31%	5	
	Answered	16	
Northern Ireland			
Direct delivery	50%	2	
Through the planning process via Section 106 agreements	25%	1	
Joint ventures on council-owned land	0%	0	
Other (please specify)	25%	1	
	Answered	4	

Are you currently considering or have already set up a local housing delivery company?

Answer Choices		Responses
England		
Yes – a wholly owned subsidiary of the council	48%	85
Yes – as a joint venture	16%	28
No	28%	50
Don't know	8%	14
	Answered	177
Scotland		
Yes – a wholly owned subsidiary of the council	25%	5
Yes – as a joint venture	0%	0
No	60%	12
Don't know	15%	3
	Answered	20
Wales		
Yes – a wholly owned subsidiary of the council	25%	4
Yes – as a joint venture	25%	4
No	50%	8
Don't know	0%	0
	Answered	16
Northern Ireland		
Yes – a wholly owned subsidiary of the council	0%	0
Yes – as a joint venture	0%	0
No	100%	4
Don't know	0%	0
	Answered	4

Is your council currently delivering or exploring private rented sector homes (PRS) as part of the solution to creating new homes in your local authority area?

Answer Choices		Responses
England		
Yes – currently delivering PRS	20%	35
Yes – exploring PRS as an option	32%	56
No	27%	48
Don't know	21%	38
	Answered	177
Scotland		
Yes – currently delivering PRS	30%	6
Yes – exploring PRS as an option	15%	3
No	35%	7
Don't know	20%	4
	Answered	20

Wales		
Yes – currently delivering PRS	31%	5
Yes – exploring PRS as an option	25%	4
No	44%	7
Don't know	0%	0
	Answered	16
Northern Ireland		
Yes – currently delivering PRS	0%	0
Yes – exploring PRS as an option	0%	0
No	75%	3
Don't know	25%	1
	Answered	4

6.2 Permitted development

[England only question] Do you think homes created through Permitted Development could prove to be dangerous to health and wellbeing?

Answer Choices		Responses	
		England	
Yes		57%	99
No		12%	20
Don't know		31%	54
		Answered	173

[England only question] Do you think that vulnerable people are likely to be disproportionately negatively affected by development delivered through the use of Permitted Development Rights?

Answer Choices		Responses	
	England		
Yes	53%		91
No	8%		14
Don't know	39%		66
	Answered		171

[England only question] Do you think that homes created through Permitted Development Rights will help support the achievement of the Government's carbon emission reduction targets?

Answer Choices		Responses	
		England	
Yes		6%	10
No		71%	125
Don't know		23%	40
		Answered	175

6.3 Approach to tackling climate change within your local authority

Has your local authority declared a climate, environmental or ecological emergency?

Answer Choices	Responses	
All nations		
Climate emergency	85%	182
Environmental emergency	6%	12
Ecological emergency	18%	39
Don't know	2%	4
None of the above	14%	30
	Answered	214

If your local authority has declared a climate emergency, what does it relate to?

Answer Choices	Responses	
All nations		
The area covered by the council	65%	133
The council's own footprint	51%	105
The council's own footprint and its supply chain	38%	78
Not applicable	9%	19
Other (please specify)	8%	16
	Answered	205

If your local authority has declared a climate emergency does it include a specific target and/or date? If yes, please state, including any detail about the commitment.

Answer Choices	Responses	
All nations		
No	4%	8
Not sure	8%	17
Not applicable	10%	20
Yes (please specify)	78%	161
	Answered	206

Do you think that your local authority has an understanding of the relevant baseline carbon emissions?

Answer Choices	Responses	
All nations		
Yes has a comprehensive understanding	41%	87
Yes, to some extent	55%	116
No	3%	7
Don't know	1%	2
	Answered	212

Does your local authority have a climate action plan?

Answer Choices		Responses
All nations		
Yes	62%	130
In progress	36%	76
No	1%	2
Not sure	1%	3
Answered		211

If yes, did you specifically seek to involve any of the following in developing it? Please tick all that apply.

Answer Choices		Responses
All nations		
Local residents/ community groups	72%	134
Young people	59%	111
Businesses	67%	125
Wider supply chain	40%	75
Not applicable	12%	22
Other (please specify)	21%	40
Answered		187

Do your development plan documents contain an overarching objective on mitigation and adaptation?

Answer Choices		Responses
All nations		
Yes, in our adopted local plan	34%	67
Yes, in our draft local plan	41%	79
No	12%	23
Not sure	13%	26
Answered		195

Do your development plan documents contain policies relating to managing/adapting to the expected impacts of climate change? (tick all that apply)

Answer Choices		Responses
All nations		
Flooding from surface water	78%	152
Flooding from rivers and the sea	77%	150
For biodiversity	76%	148
Land management practices	37%	73
High temperatures and overheating	36%	70
Water shortages	36%	70
Ability of natural capital to provide services	31%	61
Other (please specify)	13%	25
Don't know	9%	18
None of the above	4%	7
Answered		195

Do your development plan documents contain policies relating to the mitigation of climate change? Please tick all that apply.

Answer Choices		Responses	
All nations			
Promoting active travel such as walking and cycling		86%	168
Promoting and supporting the delivery of public transport		77%	150
Renewable low-carbon energy		75%	147
Reducing carbon dioxide emissions		72%	141
Electric vehicle charging points		71%	138
Setting requirements for sustainable buildings (for example BRE or Passivhaus standards)		50%	97
Requirements for using decentralised energy and district heating networks in new development		41%	79
Binding net-zero standards for new developments		25%	48
Other (please specify)		16%	32
Policies relating to fossil fuel extraction (to bring it to a managed end; reduce emissions from it etc)		16%	31
		Answered	195

If you have policies relation to adapting to and mitigating climate change, do you believe that the planning framework you are operating within enables your local authority to implement them?

Answer Choices		Responses	
All nations			
Yes		9%	18
Yes, to some extent		71%	136
No		14%	26
Not applicable		6%	11
		Answered	191

Please indicate the degree to which you agree with the following statements:

	All nations					Total	Weighted Average
	Strongly agree	Agree to some extent	Neither agree nor disagree/ Not sure	Disagree to some extent	Strongly disagree		
My local authority recognises greenhouse gas emissions as a material consideration in planning decision-making	29%	51%	14%	5%	2%		1.99
	56	99	28	9	3	195	

My local authority recognises the need to adapt to climate change as a material consideration in decision-making	37%	52%	8%	2%	1%		1.79
	71	100	16	4	2	193	
My local authority always follows the advice from our national environment agency on planning applications, for example in relation to flood risk	46%	37%	13%	3%	1%		1.74
	90	72	25	6	1	194	
England							
	Strongly agree	Agree to some extent	Neither agree nor disagree/ Not sure	Disagree to some extent	Strongly disagree	Total	Weighted Average
My local authority recognises greenhouse gas emissions as a material consideration in planning decision-making	28%	53%	14%	3%	2%		1.98
	44	83	22	5	3	157	
My local authority recognises the need to adapt to climate change as a material consideration in decision-making	36%	53%	9%	1%	1%		1.79
	56	82	14	2	2	156	
My local authority always follows the advice from our national environment agency on planning applications, for example in relation to flood risk	45%	38%	13%	3%	1%		1.77
	70	59	21	5	1	156	
Scotland							
	Strongly agree	Agree to some extent	Neither agree nor disagree/ Not sure	Disagree to some extent	Strongly disagree	Total	Weighted Average
My local authority recognises greenhouse gas emissions as a material consideration in planning decision-making	32%	53%	5%	11%	0%		1.95
	6	10	1	2	0	19	

My local authority recognises the need to adapt to climate change as a material consideration in decision-making	42%	58%	0%	0%	0%		1.58
	8	11	0	0	0	19	
My local authority always follows the advice from our national environment agency on planning applications, for example in relation to flood risk	58%	32%	5%	5%	0%		1.58
	11	6	1	1	0	19	
Wales							
	Strongly agree	Agree to some extent	Neither agree nor disagree/ Not sure	Disagree to some extent	Strongly disagree	Total	Weighted Average
My local authority recognises greenhouse gas emissions as a material consideration in planning decision-making	25%	31%	31%	13%	0%		2.31
	4	5	5	2	0	16	
My local authority recognises the need to adapt to climate change as a material consideration in decision-making	40%	40%	13%	7%	0%		1.87
	6	6	2	1	0	15	
My local authority always follows the advice from our national environment agency on planning applications, for example in relation to flood risk	38%	44%	19%	0%	0%		1.81
	6	7	3	0	0	16	
Northern Ireland							
	Strongly agree	Agree to some extent	Neither agree nor disagree/ Not sure	Disagree to some extent	Strongly disagree	Total	Weighted Average
My local authority recognises greenhouse gas emissions as a material consideration in planning decision-making	67%	33%	0%	0%	0%		1.33
	2	1	0	0	0	3	

My local authority recognises the need to adapt to climate change as a material consideration in decision-making	33%	33%	0%	33%	0%		2.33
	1	1	0	1	0	3	
My local authority always follows the advice from our national environment agency on planning applications, for example in relation to flood risk	100%	0%	0%	0%	0%		1
	3	0	0	0	0	3	

If your local authority has a role in delivering or managing development, whether directly, through a subsidiary company etc, do any of the following apply:

Answer Choices	Responses	
We are designing and supporting the delivery of places that promote active travel	60%	113
We have a housing retrofit programme	56%	105
We are implementing biodiversity net gain	47%	87
We are building carbon neutral/net zero homes	39%	73
We have a direct role in delivering renewable energy schemes	31%	58
Not applicable	15%	28
Other (please specify)	12%	22
	Answered	187

To what extent is under-resourcing a barrier to effective delivery in each of following planning-related policy topics?"1' indicates that the factor is not a barrier at all, while '5' indicates that it is a great barrier.

	1	2	3	4	5	N/A	Total	Weighted Average
Urban design and aesthetics	5%	11%	29%	24%	25%	6%		3.56
	9	20	50	42	44	10	175	
Health and wellbeing	6%	16%	30%	27%	17%	4%		3.33
	11	28	53	47	29	7	175	
Climate change adaptation	4%	10%	23%	33%	26%	4%		3.7
	7	17	41	58	45	7	175	
Climate change mitigation	4%	11%	21%	34%	25%	4%		3.68
	7	20	37	60	44	7	175	
Green space/infrastructure	6%	17%	23%	31%	19%	4%		3.42
	10	30	40	55	33	7	175	
Housing delivery (market)	7%	16%	31%	24%	17%	5%		3.28
	13	28	54	41	30	8	174	

Affordable and social housing delivery	5%	13%	29%	26%	21%	5%		3.47
	9	23	51	46	36	9	174	
Reducing inequality and injustice	7%	20%	31%	16%	18%	8%		3.2
	12	34	54	28	31	14	173	
Local sustainable transport	6%	10%	30%	20%	28%	6%		3.58
	10	18	52	34	49	11	174	
Housing stock retrofit	6%	13%	22%	20%	25%	15%		3.52
	10	23	38	35	43	26	175	
New communities	4%	12%	26%	21%	15%	23%		3.42
	6	19	43	34	25	37	164	

To what extent is a lack of skills a barrier to effective delivery in each of following planning-related policy topics? '1' indicates that the factor is not a barrier at all, while '5' indicates that it is a great barrier.

	1	2	3	4	5	N/A	Total	Weighted Average
Urban design and aesthetics	5%	18%	32%	23%	17%	6%		3.31
	8	31	56	40	29	11	175	
Health and wellbeing	6%	20%	38%	22%	9%	5%		3.08
	11	35	66	39	16	8	175	
Climate change adaptation	5%	12%	37%	29%	13%	5%		3.36
	8	21	64	51	23	8	175	
Climate change mitigation	4%	13%	40%	26%	13%	5%		3.32
	7	22	70	46	22	8	175	
Green space/ infrastructure	9%	22%	40%	18%	6%	5%		2.89
	16	39	70	32	10	8	175	
Housing delivery (market)	13%	24%	33%	20%	4%	6%		2.76
	23	42	58	34	7	10	174	
Affordable and social housing delivery	11%	26%	32%	19%	6%	6%		2.83
	19	45	55	33	11	11	174	
Reducing inequality and injustice	10%	23%	36%	17%	6%	9%		2.86
	17	39	62	29	11	15	173	
Local sustainable transport	7%	28%	29%	23%	7%	6%		2.94
	13	48	50	40	12	11	174	
Housing stock retrofit	6%	21%	27%	21%	12%	13%		3.12
	11	37	48	36	21	22	175	
New communities	5%	17%	29%	20%	8%	21%		3.12
	8	28	47	33	13	35	164	

To what extent is current national-level policy a barrier to effective delivery in each of following planning-related policy topics? '1' indicates that the factor is not a barrier at all, while '5' indicates that it is a great barrier.

	1	2	3	4	5	N/A	Total	Weighted Average
Urban design and aesthetics	9%	19%	29%	18%	18%	7%		3.19
	16	33	50	31	32	13	175	
Health and wellbeing	7%	19%	35%	18%	15%	6%		3.18
	12	33	61	32	27	10	175	
Climate change adaptation	2%	16%	27%	27%	22%	5%		3.54
	4	28	47	48	39	9	175	
Climate change mitigation	2%	17%	25%	25%	25%	5%		3.57
	4	30	44	44	44	9	175	
Green space/ infrastructure	7%	19%	32%	22%	14%	6%		3.19
	12	33	56	38	25	10	174	
Housing delivery (market)	12%	16%	31%	16%	19%	6%		3.14
	21	28	54	27	33	11	174	
Affordable and social housing delivery	6%	11%	30%	19%	28%	6%		3.55
	10	20	52	33	48	11	174	
Reducing inequality and injustice	8%	16%	35%	17%	16%	9%		3.18
	13	28	61	29	27	15	173	
Local sustainable transport	5%	16%	31%	21%	21%	6%		3.4
	9	27	54	36	37	10	173	
Housing stock retrofit	7%	12%	29%	17%	21%	14%		3.37
	13	21	50	30	36	24	174	
New communities	5%	9%	36%	14%	13%	22%		3.27
	9	15	59	23	22	36	164	

To what extent is national political leadership a barrier to effective delivery in each of following planning-related policy topics? '1' indicates that the factor is not a barrier at all, while '5' indicates that it is a great barrier.

	1	2	3	4	5	Total	Weighted Average
Urban design and aesthetics	10%	18%	36%	19%	16%		3.12
	18	32	63	33	28	174	
Health and wellbeing	9%	19%	37%	15%	20%		3.19
	15	33	65	26	35	174	
Climate change adaptation	8%	18%	30%	18%	26%		3.36
	14	31	52	32	45	174	
Climate change mitigation	7%	17%	30%	20%	25%		3.38
	13	30	53	34	44	174	
Green space/ infrastructure	7%	19%	34%	20%	20%		3.25
	13	33	59	35	34	174	

Housing delivery (market)	13%	19%	31%	19%	19%		3.12
	22	32	54	33	32	173	
Affordable and social housing delivery	6%	10%	33%	22%	28%		3.55
	11	18	57	38	48	172	
Reducing inequality and injustice	8%	17%	34%	17%	24%		3.31
	14	30	58	29	41	172	
Local sustainable transport	7%	16%	31%	24%	21%		3.37
	12	28	54	42	37	173	
Housing stock retrofit	9%	18%	30%	17%	26%		3.32
	16	31	53	29	45	174	
New communities	5%	16%	39%	17%	23%		3.37
	9	26	64	28	39	166	

Which, if any, of the following does your local authority need from organisations such as APSE and the TCPA to better incorporate the impacts of climate change in planning decisions?

Answer Choices	Responses	
Further guidance on specific topics (please specify)	31%	53
Training workshops for officers	72%	122
Training workshops for councillors	70%	119
Information regarding expected impacts of climate change in the local area	59%	100
Knowledge of how to incorporate climate projections into planning decisions	75%	127
None of the above	5%	9
Other (please specify)	15%	26
	Answered	169

How able do you feel your local authority is to turn down planning applications for the following reasons?

	Not at all confident	Slightly confident	Not confident or unconfident	Fairly confident	Very confident	Total	Weighted Average
Poor design	5%	16%	16%	46%	17%		3.54
	8	27	27	78	28	168	
Poor environmental outcomes (incl. those relating to climate change)	10%	23%	24%	38%	7%		3.09
	16	38	40	63	11	168	
Poor health and well being outcomes	17%	26%	31%	22%	4%		2.72
	28	44	52	38	7	169	
Poor green space provision	8%	13%	25%	44%	11%		3.37
	13	21	41	72	18	165	
Poor social outcomes (including health inequalities)	18%	24%	33%	21%	4%		2.69
	31	40	56	35	7	169	
					Answered		169

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3rd Floor Trafford House

Chester Road

Stretford

M32 0RS

Telephone: 0161 772 1810

Email: enquiries@apse.org.uk

www.apse.org.uk