

## **CHARNWOOD LOCAL PLAN EXAMINATION**

### **Matter 2: Vision, Objectives, Sustainable Development and the Development Strategy**

**Submission from CPRE Leicestershire**

**June 2022**

**Representation Number: 340**

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#### **Issue 1 - Are the Vision for Charnwood 2037 and the Plan's objectives soundly based and will they contribute to the achievement of sustainable development?**

##### **Question 2.1**

*Do the Plan's vision and objectives cover the full range of opportunities, challenges and priorities that need to be addressed in the Borough over the Plan period? Is it clear how the policies will help to deliver the vision and objectives over the Plan period?*

Expressed at their very general level, the Vision and Objectives cover a broad range of opportunities, challenges and priorities. But what is much less clear, in CPRE Leicestershire's view, is how much the policies in the plan will deliver the aspirations set out in the Vision. This submission will focus on climate change, travel and development strategy.

There is some recognition of climate change in the challenges, Vision and Objectives. Para 1.23 recognises the challenge of "climate change impacting on the wider environment with localised issues..." and the Vision in para 1.24, among other references, suggests that in 2037 that "Our communities will enjoy a cleaner and greener environment" and that "Charnwood will be safe and resilient to the impacts of climate change and will be playing its part in reducing greenhouse gas emissions...."

This theme is carried through in para. 1.25 where one of the objectives is “to reduce the need to travel by car, and the distance travelled, and increase the use of walking, cycling and public transport to access jobs, key services and facilities.” (Development Strategy 2 – on page 15) and another is to ‘reduce net greenhouse gas emissions, in support of achieving a carbon neutral Borough, and reduce and adapt to the impacts of climate change’ (Environment 2 on page 16).

We support these objectives. Despite these references in paras 1.23 to 1.25 we were surprised that in the list of criteria for supporting sustainable development in Policy DS1: Development Strategy, there is no specific mention of addressing climate change. In our Regulation 19 consultation response we argued this requires alteration to this policy to make it consistent with National Policy, most notably Para 152 of the NPPF.

This omission from DS1 raises wider issues which we see as an answer to the supplementary question, and in our view the more important one, under Question 2.1. There is no overall strategic goal in the Plan to cut carbon emissions and reduce the impact of climate change. The plan currently lacks any clear target to reduce carbon emissions in line with the Government’s National Policy of reaching Net Zero by 2050 or in line with Charnwood Council’s own goal to achieve carbon neutrality.

Through the Plan, a focus is very much on inputs in terms of the words set out in the different policies. But despite all this, it is unclear to what extent that these policies will actually contribute to the delivery of Development Strategy objective 2 and Environment objective 2 referred to above.

In particular, it is unclear what measurable difference requirements such as the criteria listed to support sustainable development in Policy DS1 will have with regard to these two objectives. It is also unclear how they will achieve the NPPF para.152 requirement that ‘planning should help to: shape places in ways that contribute to **radical reductions** in greenhouse gas emissions.’

Indeed, many of the proposed developments on the face of it are likely to increase emissions as the result of the car dependent character and location of many developments. Local Plans for decades, including Charnwood’s, have contained objectives and policies to reduce the need to travel by car, but traffic levels have continued to rise.

Instead of just repeating the past approach, there needs now to be greater emphasis on demonstrating how these policies will achieve measurable reductions in carbon emissions. Developments should be required demonstrate measurable reductions in net carbon emissions and while travel interventions should begin to demonstrate a measurable reduction in private car mileage. Without this, it will be difficult to establish how the Plan’s policies are helping to deliver the Vision and Objectives or make a real difference to what happens in Charnwood.

In support of this, DS1 should also include text that requires developments to contribute directly to a reduction of emissions through the way they are designed and delivered so they are at least net zero, and better still, carbon zero in the longer term. Achieving such developments should be a key element of the overall development strategy. An additional criterion should be added to the list of bullet points in DS1 to the effect that there will be support for sustainable development that:

*“is carbon costed and can demonstrate that it will contribute directly by way of its design, delivery and access to a reduction in greenhouse gas emissions and to the achievement of carbon neutral Borough”.*

This provision would provide a stronger and more positive emphasis on the way in which individual developments include elements that contribute to reducing emissions and more efficient use of energy.

In conclusion, in CPRE Leicestershire’s view, there needs to be a greater emphasis on assessing, and where appropriate, measuring to what extent the policies are having an impact in terms of delivering the outcomes that the Vision seeks. There is all too often a presumption that policies will deliver the objectives and too often that is not the case. Without a requirement, such as the one proposed above in place, it will be difficult to begin to assess any gap between policies and their delivery and impact. This submission has focused on a particular point with regard to climate change issues, but the general point here could apply in other areas of the Plan.