Net Zero policies in Canterbury’s local plan

Canterbury City Council
Tuesday 29 November 2022

Summary

While local plans often encourage emission reductions, they often lack the policy detail needed to do so. More of the same in Canterbury could lead to planned development in the district generating about 40% of its carbon budget through to 2045. Our new local plan is set to change this, aiming to ensure that all new development is working to achieve Net Zero. Its new policies will nearly halve emissions from new development.

Cllr Ben Fitter-Harding, Leader of Canterbury City Council, says: “We know that reducing carbon emissions from the built environment and transportation is a significant challenge to reaching Net Zero.

“That’s why we have incorporated policies into the draft local plan that specify development with the lowest possible carbon emissions and facilitate a major transformation of the transportation network in our congested city and towns.

“Our next iteration of the plan will seek to ensure that carbon reduction and climate resilience can be delivered at the pace necessary this decade.”

The problem

In the past, local plans have not evaluated the increase in carbon emissions from:

- making new buildings and infrastructure (place development)
- heating and powering that new development and the associated infrastructure and movement of people and goods (operation)

This is despite it being well documented that construction and development are a major contributor of emissions.

Local plans often encourage emission reductions in their policies. They mention cutting embodied carbon emissions, increasing building energy efficiency, improving transport sustainability, and ramping up renewable energy production. But they often lack the specific enumeration and policy details needed to control carbon emissions.

Without robust carbon reduction policies in Canterbury, we estimate emissions generated from planned development to be about 40% of the district’s carbon budget through to 2045.

Our previous local plan – ‘Canterbury District Local Plan 2017’ – included policies to try to reduce carbon emissions. But the policies lacked specific quantitative goals. They also contained loopholes that allowed development to proceed without any significant reductions in embodied or operational emissions.
The work to prepare the 2022 local plan – ‘Canterbury District Local Plan To 2045’ (the Local Plan) – has therefore sought to include:

- best-practice evaluation of carbon emissions
- embodied and operational emissions standards
- renewable energy strategies in transport

The Local Plan takes inspiration from pioneer councils and planning authorities in this type of work, including:

- Greater Cambridge Shared Planning (carbon emissions assessments)
- Teignbridge District Council (allocated land for onshore wind energy, solar energy, and battery storage)
- Mayor of London (operational and whole-life assessment of carbon emissions)

The solution

The Canterbury district has a population of around 160,000 people. They live in the historic city of Canterbury, the seaside towns of Herne Bay and Whitstable, and 26 other parishes across the largely rural district.

The aims of the policies within the Local Plan are to ensure that the growth and development planned within the district are also working to achieve Net Zero carbon emissions. Its sustainable design policies, set out below, were strongly supported during the consultation phase in 2021.

Policy SS2: Sustainable design strategy for the district

New development should:

- be designed to achieve Net Zero operational carbon emissions
- make efficient use of land
- be designed to maximise energy and water efficiency

Policy DS6: Sustainable design

This policy builds on Policy SS2 with the need to achieve Net Zero operational emissions using an accredited standard and provide a whole-life carbon assessment.

At first, in working groups with councillors and in consultation workshops with developers, there was resistance to this approach, with particular concern over the cost implications.

Since then, however, more evidence and knowledge has become available and the viability assessment has shown that the carbon reduction measures are affordable. And so the policies have progressed to the Regulation 18 consultation stage.

Carbon reduction plan and fund

In the next stage of the Local Plan’s development, the specific policy details of a carbon reduction plan and fund will be developed. Its aim is to enable levies and contributions into a carbon off-setting fund. That fund would then be used to deploy other carbon reduction measures such as retrofitting and renewable energy within the district.

Historic buildings retrofit

The Local Plan also includes policies to support the sensitive retrofitting of historic buildings, a key issue for the district.

Renewable energy

We also conducted a renewable energy site assessment process, which could lead to an additional 100 MW of renewable energy generation within the district. This is around 25% of the projected required solar renewable energy increase for the district by 2050.
While this process produced important new evidence, the sites have not yet been allocated. This is due to concerns over size, location, and impacts on ecology and designated landscapes of some of the proposals.

Instead, the Local Plan includes policies to provide a supportive policy framework to be applied to planning applications for renewable energy proposals.

**Timeline**

Work on the Local Plan started in 2020.

The work to introduce and improve the climate change elements of the process has been continuous. It has required significant amounts of discussion, briefings, and examples to enable the extra assessments and work to be included in the Local Plan’s development process.

The examples from pioneer councils and planning authorities (see ‘the problem’ above) have been very important in presenting the case for change.

**Stakeholders**

Due to lack of resources to commission extra work, council officers have undertaken all the work.

Policy consultation and workshops have been included within the normal local plan development process as per the Local Development Scheme and Statement of Community Involvement.

**Impact**

The policies to reduce carbon emissions are estimated to lead to a near 50% reduction in carbon emissions from new development. This is in the region of 25% of the remaining carbon budget for the district from 2022 to 2050. You can find more details in the council’s [Climate Change Topic Paper (October 2022) (445 KB PDF)](#).

The impact of the proposed changes to the transport system, including a major reallocation of urban road space to active travel and public transport, is more uncertain.

The impacts have been difficult to project due to inadequacies in the specified current established methodology for local plan transport modelling. This methodology is required by National Highways, highways authorities, and ultimately the Planning Inspectorate. National fleet projections and emissions factors for road transport are pessimistic about the transition to electric and zero-emissions vehicles by 2045, especially for HGVs and buses.

Nevertheless, we expect the transformative approach to the transport system in the Canterbury district to significantly reduce pollution and congestion and produce an overall carbon reduction from movement. This is because it prioritises active travel and public transport.

**Lessons learned**

**New resources needed to calculate emissions**

It is imperative that carbon emissions calculations are included in developing local plans as an iterative process. This requires new resources and steps in the process.

There is technical complexity to doing this work. It takes a lot of time and effort to gather the evidence for all the different plan elements including construction, transportation, energy, and land use.

National Planning Policy Framework guidance does not provide adequate detail to help local-plan makers in this regard.
A new framework is required to standardise the process

A new framework and standard for enumerating carbon emissions within local plans would greatly assist in ensuring that carbon emissions and Net Zero are properly included in the development of local plans.

Currently, the decarbonisation approach to developing local plans across England appears to be highly variable.

Often teams working on local plans are doing the work for the first time. So it is important to show best practice for gathering and modelling climate change evidence to planning leaders early in the process. This is to gain their buy-in and ensure the council plans and allocates sufficient resources.

Current transport planning is not compatible with Net Zero

The current methodology for transport planning within local plans is based on:

- forecasting an increase in the number of vehicle trips for people and goods
- providing road capacity first and foremost to enable such expansion

This methodology is not compatible with the work necessary to transform movement and transport to Net Zero. These models still predict carbon emissions from transport to continue increasing. The methodology steers local plan infrastructure projects towards increased road movement capacity projects.

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This work has so far cost around £40,000 in staff time. A comparable amount will be required to follow the policies through to implementation.

Next steps

The Local Plan is currently in the Regulation 18 consultation phase.

Further details of the policies and their implementation will be necessary over the next stages of the plan’s development.

In particular, the phasing of the transport interventions and the formation of funding and levy mechanisms – the ‘carbon reduction plan’ – will need to be developed.

Links, contacts, and credits

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