



Why the Planning System needs to be at the heart of delivering the UK's Climate Change targets

Response to the Planning White Paper consultation

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Section 1 – Introduction & summary

The planning system has a unique contribution to make in the effective delivery of the UK Government's carbon reduction target. Planning is a powerful tool in framing practical and place-based pathways to a zero-carbon future. At its best, planning can shape the most cost-effective policy choices for carbon reduction and do that as part of a wider democratic conversation with the local community. Planning is fundamental to successfully delivering new renewable energy systems, to minimising the carbon emissions of what we build, of finding the right sustainable locations and of designing places that support healthy and zero carbon transport options.

To fulfil this potential, it is vital any new planning system should have climate change as its first legal and policy priority. The Government's planning white paper, 'Planning for the Future', is clear in its ambition to wipe away the existing system but it does not provide clarity on how the new proposals will deal with the current climate crisis. The IPCC report of 2018 makes clear that emissions must fall by 45% from 2010 levels within the next 9 years, with net zero to follow by 2050. The UK is already not on track to meet its own carbon budget commitments under the Climate Change Act. What we build today will be with us here in 2050, and beyond. Urgent action is required now.



Planning reform must have climate change at its heart. The risk otherwise is that the planning system itself fuels, rather than tackles the climate crisis.

But rather than create a more stringent framework, the white paper creates uncertainty about the role of the system in tackling climate change and fails to provide any detailed explanation of how carbon reductions will be secured. We welcome the recognition that the planning system should support the government's "efforts to combat climate change". But what this means in practice, or setting the high bar of what is expected from the planning and consenting of new development commensurate with delivering net-zero by 2050 has been left for another occasion. This clarity is needed now. Each day new development gets the go-ahead and makes the target harder to achieve. We therefore urge government to provide this clarity urgently.

As a coalition of organisations with a wealth of expertise on climate change, renewable energy and town planning, we call on Government to ensure that, in considering the objectives, structures and governance of a new planning system for England, rapid carbon emissions reduction is given pre-eminent status. The reformed planning system must have four central characteristics:

1 Alignment of the legal objectives of the Planning and Climate Acts.

The proposed new planning regime should confirm a clear and specific duty that local planning should address climate change by comprehensively binding together the Town and Country

Planning Act and the Climate Change Act. This should build upon the existing legal duty in section 19 of the 2004 planning Act. The duty should be contained as part of the wider statutory purpose of planning around sustainable development, should apply to both development planning and development management and should include explicit reference to implementing the carbon reduction budgets required by the 2008 Climate Act.

Given the pace at which Government wishes to legislate on planning reform we have provided draft wording for this essential climate duty in Annex 1 of this paper.

2. Climate change as the pre-eminent policy test in planning.

National planning policy must translate this overall legal duty into clear policy priorities so that action on carbon reduction is the first amongst equals of material considerations in the planning process. National policy should also set out a carbon reductions delivery test to ensure that all local authorities are accountable for any failure to achieve carbon reductions in new development the same way they are accountable or a failure to deliver housing targets.

3. Clear support for effective policy action.

National guidance should set out those local planning policies likely to have greatest impact on carbon reduction but also enable and not restrict the ability of local planning authorities to take locally appropriate action including setting more demanding targets on building performance over and above national standards, including through the development of any design codes



and pattern books, where this can be justified by the evidence including on development viability. This flexibility should be extended to neighbourhood plans

4. Clear metrics for carbon accounting, monitoring and reporting.

National guidance should set out a clear methodology for carbon handling in the plan preparation and development management process, in order to reduce uncertainty and avoid unnecessary duplication of effort. Government should ensure the annual monitoring reports are published by local planning authorities, to include specific data on carbon performance of new development and how that relates to the existing carbon budgets for their area as a whole, and take responsibility for publishing these reports as a national data set.

We expect that MHCLG will establish a series of thematic work-streams as the White Paper is further refined. Our collective view is that a planning system that had carbon emissions reduction at its heart would contain the following features, as a minimum. We stand ready to offer our time and expertise to support the Government with their work-stream on the central role of carbon management and climate protection within the new planning system.

In our view, a planning framework that had tackling climate change at its heart must:

- Focus first on how places function, rather than simply how they look, demanding a range of essential climate and sustainability design features to ensure the development of resilient and climate-proofed places, which contribute as little as possible to ongoing emissions.
- Include a requirement for local plans to assess, describe and plan for the energy system transition that will be needed across the entire Local Plan, to ensure that new developments are planned in such a way as to fit within the decarbonisation strategy for the Local Plan area as a whole.
- Provide a framework to secure adequate infrastructure contributions, through subsidy where necessary, to ensure the delivery of ambitious levels of sustainable energy, green infrastructure, and active and public transport.
- Link directly to a robust, fabric-first building standards regime, allowing local authorities to produce local policies requiring, higher standards, and/or to introduce them sooner than set nationally, where the evidence base demonstrates these are deliverable, to ensure that building energy demand is always minimised through design.

- Ensure the new sustainable development test cannot be passed if zero-carbon development is not integral to an area's development plan, or any planned development site within it, to ensure that adopted plans can guarantee place-making fit for a net-zero emissions future
- Provide a super-charged funding regime, to ensure that local authorities can properly invest in the preparation of design codes, and put in place an ongoing monitoring, inspection and enforcement regime that will result in high levels of compliance with their sustainability policies.

Summarised here, we consider each in more detail in our longer submission, as well as providing an outline draft of the proposed new binding duty on carbon and planning, at Annex 1.



Section 2 – Further detail on key features of a climate-proofed planning

A planning framework that had climate change at its heart would focus first on how places function, not how they look, and would use the proposed Design Codes to demand a range of essential climate and sustainability design features.

The White Paper makes repeated reference to the need for developers to pay more regard to beauty, and draws heavily, but selectively, on the January 2020 report of the 'Building Better, Building Beautiful Commission'. The subtlety of the Commission's view of beauty has however, largely been lost: "Beauty is not just a matter of how buildings look (though it does include this) but involves the wider 'spirit of the place', our overall settlement patterns and their interaction with nature. It involves both the visual character of our streets and squares, and also the wider patterns of how we live and the demands we make on our natural environment and the planet. We should therefore be advancing the cause of beauty on three scales, promoting beautiful buildings in beautiful places, where they are also beautifully placed."

The White Paper paints a picture of a reformed planning system that focuses principally on aesthetics, at the expense of creating a long-term vision for how homes and places will need to function if they are to minimise their impact on climate change and perform in a climate that is already guaranteed to change for the worse.

How places are planned, the standards of development required, and the location of what is consented will all affect emissions, the pace of decarbonisation and the potential for 'smart energy'. We therefore urge the Government to incorporate within the new planning system the principle that "nothing should be planned without having successfully demonstrated it is fit to take its place in a net-zero emissions future", and ensure this is central to the proposed National Model Design Code.

The reformed planning system must be able to determine, direct and enforce a place-making approach that will:

- Ensure that the design of new development minimises requirements for heating, cooling and power, through a combination of place-making principles associated with density, mix of activities, layout and orientation.
- Demonstrate an understanding that the extent to which heat, cooling and power are required by buildings can be influenced by their design,

1 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/861832/Living_with_beauty_BBBBC_report.pdf

2 Planning for a Smart Energy Future, RTPI SW, July 2019 www.rtpi.org.uk/smartenergy/?utm_sq=gcnqknki32



through orientation, shading, onsite technologies and fabric requirements.

- Maximise the cost-effectiveness of district heating networks, for existing places and planned development, through directing the density and mix of development and activities on all sites. New development should be expected to connect to an existing decentralised energy supply system where there is capacity to supply the proposed development, or being designed for a future connection where there are firm proposals for such a system
- Require that the location and density of new development, as well as how movement is managed within development, ensures that private car use as a primary mode of travel is replaced by more sustainable travel choices.
- Maximise opportunities for local energy networks to reduce reliance on existing national infrastructure and avoid costly (and likely contested) enhancements.
- Use the understanding of all the points above to derive settlement patterns, layouts, and individual building designs that create the 'modest masterpieces' of the future.



The system must also allow for any design codes developed at the local level as part of a new Local Plan to be subject to a process of design review, allowing for detailed scrutiny, once applicants come forward for their 'as-of-right' consent on any site. This is in line with the proposals of the Housing Audit 2020, and aligns with standard practice in the most effective and sophisticated zoning systems globally.

Section 1.18 of the White Paper includes a commitment to:

Ask for beauty and be far more ambitious with the places we create, expecting new development to be beautiful, and to create a 'net gain', not just 'no net harm', with a greater focus on 'placemaking' and 'the creation of beautiful places' within the National Planning Policy Framework.

This is a laudable aim, and one that we wholeheartedly support. But it must be clear that, in line with the BBBBC's view of beauty, the ambition relates not just to aesthetics, but to the development of entirely resilient and climate-proofed places, which contribute as little as possible to ongoing emissions. The beautiful design principles so strongly advocated for in the White Paper must encourage the development of a 'new vernacular' for many places – one which remains true to local character while focusing on climate resilience in materials, design, massing and layout. Without such purposeful attention to the future, a legacy of reduced wellbeing and patchy, ugly retrofit will soon have to follow.

3 <https://indd.adobe.com/view/23366ae1-8f97-455d-896a-1a9934689cd8>

A planning framework that had climate change at its heart would introduce a requirement for local plans to assess, describe and plan for the energy system transition that will be needed across the entire Local Plan Area



Planning for new development does not occur in a vacuum. Planning authorities must deliver new homes, business premises and communities while at the same time maintaining the vibrancy and resilience of their existing communities, which will continue to represent the bulk of their population and built environment.

In a similar vein, planning for the energy and transport needs of new development cannot proceed in isolation from a true understanding of the nature, pace and scale of emissions reductions that are needed in the existing heat, transport and power sector across a district as a whole. Local Area Energy Plans should therefore become a required component of the evidence base for any new-style 'zoned' Local Plan, to ensure that the energy needs (and therefore carbon emissions) of new developments are planned in such a way as to fit within the decarbonisation strategy for the Local Plan area as a whole.

Local Area Energy Plans provide a sound foundation for effective and sustained local action to cut carbon emissions, outlining the changes needed over time to achieve all local commitments on net zero carbon emissions. A LAEP also defines what other actors, such as national government, regulators and energy networks, need to do (and when) for the decarbonisation plan to become a reality. To comprehensively

underpin a Local Plan, a LAEP must provide robust technical evidence through analytical techniques that consider the whole energy system (energy, transport and waste), and make consistent use of available data. For example, the energy system scope of the analysis must include: local generation opportunities for low/zero carbon heat and power; distribution networks for electricity, gas and heat; use of distributed hydrogen where regional/national contexts suggest it may be an option; heat demand in buildings, and the opportunities for managing and meeting it. Transport analysis is likely to include expected demand for EV charging, and its impacts on electricity distribution systems, as well as patterns of modal shift and reduced associated fuel emissions.

Without such an understanding of how the existing building stock and transport system in a given local authority area is going to decarbonise, Local Planning Authorities will not adequately understand the impact of, and act to accommodate effectively, the inevitable increased emissions that will come from new development.

4 Local Area Energy Plans: The Method. July 2020 (CSE and ESC for Ofgem/BEIS). www.cse.org.uk/downloads/file/LAEP-method-final-review-draft-30-July-2020.pdf

A planning framework that had climate change at its heart. It would link directly to a new, robust, fabric-first building standards regime, while still allowing Local Authorities to produce evidence-based local policies requiring, monitoring and enforcing higher local standards where viability allows

The White Paper commits to:

Facilitate ambitious improvements to the energy efficiency standards for buildings to help deliver our world-leading commitment to net-zero by 2050.

However, the White Paper gives scant detail on how this will be achieved, other than to push further into the future the long-awaited response to the highly-criticised proposed 'Future Homes Standard', and to suggest that new buildings will not immediately be required to be zero carbon, but will somehow be constructed in such a way as to not require future retrofit. This is an entirely unconvincing policy position. Government should resolve the outstanding Future Homes Standard so that there is a clear and ambitious fabric-first regime in place⁵, before the Planning White Paper begins its progress through Parliament.

There is an overwhelming imperative to seek radical reductions in carbon emissions across our economy, and The Committee on Climate Change (CCC) Net Zero report highlighted that the complete decarbonisation of buildings will be a necessary component of this if the UK is to meet its carbon emission reduction targets. In this regard, the sudden and widely-criticised decision in

2015 to cancel the zero-carbon homes policy has already led to an estimated 430,000 tonnes of avoidable CO₂ emissions to the atmosphere from new housing between 2016 and mid 2018 alone⁶. Thus, the White Paper's proposal for a 2025 target for new builds to achieve only 75-80% reductions in carbon emissions merely extends this entirely avoidable performance gap. In the context of a hugely accelerated target housing number of over 300,000 new homes per year, the proposed target and timeline is neither sufficiently ambitious to meet the gravity of the climate crisis, nor reflective of the technical solutions already available. The White Paper's proposal that homes should be merely "Zero carbon ready" binds in avoidable emissions, and Para 3.3 of the paper even goes as far as to admit that these proposals are not enough and will need review.

For new housing built now with a higher than necessary energy demand to be zero carbon, the grid itself will need to decarbonise rapidly. Notwithstanding that minimising demand at build stage would make this transition easier to achieve, the White Paper does not then address grid decarbonisation in any level of detail. In our view, the entire energy system transformation will have to pass through the planning system at some point, and Government must be

5 www.ukgbc.org/wp-content/uploads/2020/02/UKGBC-Response-to-MHCLG-Future-Homes-Standard-Consultation-FINAL.pdf

6 https://ca1-eci.edcdn.com/reports/ECIU_Zero_Carbon_Homes_Final.pdf





much clearer and more directive on the role of planning to deliver zero-carbon energy supply as well as requiring new buildings to require as little energy as possible from the outset.

Not only must a reformed planning system require higher construction standards, much sooner, it must also make provision for monitoring the performance gap between buildings 'as-designed' and 'as-built', allowing local authorities to demand remedial action for buildings with higher than permitted emissions. The 2018 Hackett Review of Building Regulations and Fire Safety identified that compliance with current building regulations is weak, and a recent government funded study by Innovate UK found that carbon emissions were 3.8 times higher than design estimates across a range of non-domestic buildings and only 1 of the 49 buildings had actual carbon emissions that matched the design estimate. This 'performance gap' means that even the current system does deliver on an already unambitious standard, leaking avoidable emissions and creating a cost to the taxpayer of retrofit that could easily have been avoided. Building regulations and planning should neatly dovetail to set and enforce high standards of building energy efficiency.

It has already been demonstrated that it is economically and technically viable for developers to achieve carbon savings of more than 31% (the government's current preferred option for building regulations uplift) in London⁷. Monitoring information from the GLA shows that on average development proposals approved by the Mayor since September 2007 have achieved typical savings between of 30 and 40 per cent above Building Regulation requirements, with about a quarter of applications

meeting or exceeding 40 per cent savings⁸.

Bath and North East Somerset, Bristol, South Gloucestershire and North Somerset Council areas are also considering similarly high standards in draft and forthcoming Local Plans. Their shared evidence base⁹ suggests that it is possible to achieve net zero regulated carbon emissions from a combination of energy efficiency (10% improvement beyond building regulations) on site renewable energy and allowable solutions for an additional capital cost of between 5-7% for homes and non-domestic buildings.

Given that supply chains and work force knowledge is often local and house prices vary significantly across the country, providing local authorities with the power to set higher standards will allow a more granular response matched to local conditions and ensure that the highest possible carbon emissions savings will be achieved for each part of the country.

7 Driving Energy Efficiency savings through the London Local Plan (2017) Burohappold Engineering [online] available at: www.london.gov.uk/sites/default/files/driving_energy_efficiency_savings_through_the_london_plan_-_data_analysis_report_-_buro_happold_.pdf

8 London South Bank University. Review of the Impact of the energy policies in the London Plan on applications referred to the Mayor. GLA, 2009

9 Cost of Carbon reduction in New Buildings (2018), Currie and Brown [online] available at: www.bathnes.gov.uk/sites/default/files/sitedocuments/Planning-and-Building-Control/Planning-Policy/LP20162036/cost_of_carbon_reduction_in_new_buildings_report_publication_version.pdf

With fast moving innovation in energy and construction technologies and much greater ambition by local communities to take action on climate change it is essential that the new planning system retains the flexibility for local authorities to set local policy standards, and any gradualist approach set in the national Building Regulations should act as a floor, rather than a ceiling on local ambition.



A planning framework that had climate change at its heart would ensure that adequate infrastructure contributions are made with regard to sustainable energy, green infrastructure and active and public transport.

Appropriate investment in infrastructure will be critical for accelerating England's transition to a net zero carbon country, and ensuring resilience in the face of climate change impacts.

This includes investment in well-planned district heat networks and renewable energy generation, which will be critical in order to decarbonise the built environment; green infrastructure to mitigate flooding and support urban biodiversity and cooling; retrofitting programmes to ensure extremely energy efficient buildings to help minimise demand on the energy grid; and a transformative approach to the delivery of low-carbon transport infrastructure (EV charging points, cycle lanes, cycle storage etc.) to drive a wholesale shift to low carbon and active travel methods.

Replacing the Duty to cooperate with a strategic tier of planning to link public and private investment

The Planning White Paper signals the government's intention to abolish the Duty to Cooperate. The consultation also asks how strategic cross boundary issues should be best planned for in the future.

We call on the government to ensure a strategic tier of planning is developed to enable public and private infrastructure investment to be tested against different spatial strategies. Delivery could then



be planned for effectively, and in turn inform the allocation of Zones.

Linking the new Infrastructure Levy contributions to the low carbon transition

It is our view that the proposed national infrastructure levy outlined in the Planning White Paper must ensure that adequate infrastructure contributions are made to ensure that the low-carbon transition is prioritised over other, more politically attractive options, such as reduced council tax. Without this focus on delivering the right infrastructure, the rapid country-wide transition to a net zero carbon economy will not happen and old behaviour patterns will be baked into new developments.

Improving the alignment of utility investment with planning

Effective deployment of infrastructure is critical for decarbonising England's built environment, but Local Authorities have no statutory powers to align utility providers' investment strategies with wider local objectives or to encourage building retrofits to reduce energy and water demand (other than by influencing major retrofits through planning consent).

¹⁰ RTPI, 2020: Planning for critical infrastructure in London

Research underpinning the forthcoming 'Planning for critical infrastructure in London' report by the RTPI¹⁰ has revealed a number of barriers to the delivery of utilities infrastructure under the current planning system, and the report has made recommendations for priorities to be addressed under any new planning system. This will require further action from central government, regulators, and utility providers.

In 2019, the National Infrastructure Commission (NIC) published its review of the regulatory system for energy, telecoms and water. This report set out recommendations to adapt the regulatory system to better meet future demand, while securing the investment needed to reduce emissions and increase resilience to floods and drought.

We call on the government to address the barriers identified, and take on the recommendations detailed in the NIC review and the forthcoming RTPI 'Planning for critical infrastructure in London' report.



A planning framework that had climate change at its heart would include a new Sustainable Development Test that cannot be passed if zero-carbon development is not an integral part of the overall plan or any planned development site within it.

The White Paper states that there will be a future consultation, promising further engagement on plans to 'abolish the Sustainability Appraisal system and develop a simplified process for assessing the environmental impact of plans'. We welcome the opportunity to engage with this future consultation, and would press for the revised approach to Sustainability Appraisal to include at its heart a Sustainable Development Test that has zero-carbon at the heart of it.



We would also note that the commitment within the White Paper to consult on the Sustainability Appraisal is worrying in its phrasing, suggesting that future SA processes are envisaged as being focused on environmental issues alone; sustainable development has social and economic dimensions as well as environmental metrics, and we look for confirmation of this 'three pillars' approach in the specific consultation on this issue, along with a commitment to understanding that sustainability appraisal is often, by necessity, an iterative process that cannot be shortcut.

There must also be a central assumption that, in the development of local plans, design codes and pattern books, and through supporting Neighbourhood Planning, Local Authorities should demonstrate a good understanding of the medium-to-long term conditions

that will prevail across the plan area, with regard to predicted future temperatures and incidence of extreme weather, to demonstrate that what is planned will be adapted to the unavoidable climate change impacts already baked into the system. In a similar vein, proposed developments should be subjected to a similar 'future-proofing' Sustainable Development Test on a per-site basis.

Any sustainability test for a local plan or masterplan should also be grounded in technical and economic realities; thus, design codes, site allocations etc cannot be assumed to be sustainable if the ability to deliver zero-carbon rests largely on assumptions about technologies that may become available or economically viable at a later date, but are not currently a commercial reality in any meaningful sense.

And finally, the Brundtland Definition of Sustainable Development (*Sustainable Development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs*) should be a central tenet within any new Sustainability Appraisal system and the Sustainable Development Test at the heart of it. The Brundtland definition has stood the test of time because it requires practitioners to take a holistic approach and consider all aspects of sustainability. One aspect of sustainability (for example, the delivery of housing) cannot be allowed to over-ride other pillars; a high 'score' in one area cannot be allowed to compensate for an unacceptably low 'score' against another measure of sustainability.

A planning system that had climate change at its heart would provide a super-charged funding regime, to ensure that Local authorities can properly invest in the preparation of design codes, and would put in place an ongoing monitoring, inspection and enforcement regime that will ensure high levels of compliance with sustainability targets.

The White Paper indicates that pattern books and design codes will have a central role in the new planning system, stating that Government will:

Expect design and guidance codes – which will set rules for new development – to be prepared locally and based on genuine community involvement rather than meaningless consultation, so that local residents have a genuine say in the design of new development, and ensure that codes have real ‘bite’ by making them more binding on planning decisions.

Establish a new body to support the delivery of design codes in every part of the country, and give permanence to the campaigning work of the Building Better, Building Beautiful Commission and the life of its co-chairman the late Sir Roger Scruton.



Ensure that each planning authority has a Chief Officer for design and place-making, to help ensure there is the capacity and capability locally to raise design standards and the quality of development.

And;

Make it easier for those who want to build beautifully through the introduction of a fast-track for beauty, through changes to national policy and legislation, to automatically permit proposals for high quality developments where they reflect local character and preferences.

As with the proposals to ‘ask for beauty and be more ambitious’, these commitments are lifted largely from the report of the Building Better, Building Beautiful Commission. But some of the wider context discussed in that report is missing, in particular the cost and time involved in doing this well (bearing in mind that the ‘zoning + design codes’ approach almost entirely shifts the burden of detailed design from developer to local authority), and the costs of enforcing non-compliance (in an industry where the practice of ‘value-engineering’, or building a lower-quality development than that which was permitted, is endemic).

The Institute for Fiscal Studies provided Select Committee evidence in 2019¹¹ showing that real-terms reductions on local government service spending have been most severely felt by planning

¹¹ <https://publications.parliament.uk/pa/cm201719/cmselect/cmcomloc/2036/203605.htm>

departments, with real-terms cuts of over 50% since 2009. This shows that, even within the context of the wider reductions in local authority funding that are 'without parallel in modern times', planning departments have been hardest hit by the decade of austerity. From this low base, it is clear that many local authorities cannot hope to take on an entirely re-imagined planning system without some recognition that this historic funding gap must be back-filled, and additional funding for the transition must be provided. Only through a supercharged funding regime, giving sufficient time for the development and resources for enforcement of detailed design codes that maximise both climate change mitigation and adaptation, can there be any hope of the proposed new planning system creating genuinely sustainable places.



Annex 1

Proposed wording of a new duty on carbon reduction in planning

Planning and Climate Change

- (1) This section applies to any person or body exercising a decision-making function—
 - (a) in relation to local development documents; or
 - (b) in relation to local development management including any prior approval for permitted development.
- (2) In exercising such function [and to secure sustainable development for the purposes of the planning act/s], the person or body must ensure that the development and use of land in question contributes to the mitigation of and adaptation to climate change.
- (3) For the purposes of this section contributing to the mitigation of climate change shall include the achievement of:
 - (i) the target for 2050 set out in section 1 of the Climate Change Act 2008 and
 - (ii) applicable carbon budgets made pursuant to section 4 of the Climate Change Act 2008, having regard to the anticipated life of the development in question.
- (4) For the purposes of this section contributing to the adaptation to climate change shall include the achievement of long-term resilience to climate-related risks, including:
 - (i) the mitigation of the risks identified in the latest climate change risk assessment conducted under section 56 of the Climate Change Act 2008, and
 - (ii) the achievement of the objectives of the latest flood and coastal erosion risk management strategy made pursuant to section 7 of the Flood and Coastal Water Management Act 2010.

