



Consultation submission to: Planning Policy Consultation Team  
Ministry of Housing, Communities & Local Government

By Centre for Sustainable Energy and Town & Country Planning Association

Submitted by email to  
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23 March 2021

***Re Response to National Planning Policy Framework (NPPF) and National Model Design Code (NMDC) Consultation***

Dear Sir or Madam,

On behalf of CSE, TCPA, Bristol Energy Network, Campaign for National Parks, CPRE, Cycling UK, Friends of the Earth, Green Alliance, Ramblers, Rights: Community: Action, SNRG, UKGBC, and Wildlife and Countryside Link, we submit the following response to the National Planning Policy Framework and National Model Design Code Consultation.

The consultation is the first significant review of the NPPF since the publication of the IPCC report Global Warming of 1.5°C in 2018<sup>1</sup>. This watershed report revealed the extraordinary dangers of allowing a global temperature rise of 2°C, which are far worse than previously anticipated, and underline the overriding need to speed up climate action to contain temperature increases below 1.5°C. The NPPF consultation is also the first review since the Climate Change Act was revised in 2019 to commit the UK to achieving net zero emissions by 2050. The Committee on Climate Change (CCC) have additionally recently released the 6th Carbon Budget, the first carbon budget to recommend the UK's pathway to net zero. The planning system has major role to play in shaping new development, transport patterns and energy systems that can deliver on the target and adapt to a dramatic increase in severe weather and sea levels. However, the NPPF consultation proposals do not address the Government's net zero ambition which is a significant lost opportunity.

Whilst we welcome the proposed revised text at paragraph 11 (a), specific additional text is needed in chapter 2 of the NPPF to provide clarity on the importance of climate change within the context of sustainable development, and to explicitly set the 2008 Climate Change Act at the centre of the planning system. Action on carbon reduction

must become the first amongst equals as a material consideration in the planning process. The following paragraph should be inserted after paragraph 9.

*Climate change is the greatest long-term challenge facing the world today. Addressing climate change is therefore the Government's principal concern for sustainable development. For the avoidance of doubt, achieving sustainable development includes securing the mitigation of, and adaptation to, climate change. All planning strategies, and the decisions taken in support of them, must reflect the Government's ambition to help business and communities build a zero carbon future and prepare for the impacts of climate change. Accordingly, planning policies and all planning decisions must be in line with the objectives and provisions of Climate Change Act 2008 including the 2050 net zero carbon target.*

If this statement is accepted, the following high level changes to NPPF policy approaches are necessary:

### **Carbon reduction contributions from local plans**

- The NPPF should be updated to reflect the role of local government in meeting the net zero target, as envisaged in the government response to the future Homes Consultation<sup>2</sup>:

*"All levels of Government have a role to play in meeting the net zero target and local councils have been excellent advocates of the importance of taking action to tackle climate change. Local authorities have a unique combination of powers... [which] enables them to drive local progress towards our national climate change commitments ..."*

- Local authorities should be encouraged and enabled to move faster in achieving net zero where this has been agreed through climate emergency declarations and they should be free to develop the necessary policies needed, provided that development viability and housing delivery is maintained. As stated by the CCC<sup>3</sup> in the context of the Paris Climate Accord, carbon emission reductions secured via local authority action plans represent 'locally determined contributions' in addition to nationally determined contributions.
- If the UK is to meet the 2050 net zero commitment, radical action will be needed by local authorities over the emissions which they influence. Therefore the NPPF should explicitly set out requirements for local plans to be carbon audited and to show emissions reductions in line with the Climate Change Act, and should set out a clear methodology for carbon handling in the plan preparation and development management process.

### **Housing design, specification and location**

- The NPPF and the NMDC should embed the principle that "nothing should be planned without having successfully demonstrated it is fit to take its place in a net-zero emissions future". National design guidance and all design codes should focus first on

how places function within a climate adapted, zero carbon world, not just on how they look. Net zero design and climate adaptation must be integral to all new development, not solely balanced off against aesthetic considerations. It makes no sense for what is planned and built today to be delivered in a way, or in places, that will require costly retrofitting tomorrow.

- Local planning authorities should be encouraged to set binding standards that development should be net zero carbon and encourage the adoption of proven design and assessment frameworks such as BREEAM and Passivhaus. The Committee on Climate Change (CCC) have recently commented: “Spatial Planning was one of the biggest opportunities that local authorities have to deliver on Net Zero, but that the National Planning Policy Framework... undermine(s) local authorities’ ability to require developers to build high quality low-carbon developments in sustainable locations”.<sup>4</sup> The decision in 2015 to cancel the zero-carbon homes policy has led to an estimated 430,000 tonnes of avoidable CO<sub>2</sub> emissions to the atmosphere from new housing between 2016 and mid 2018 alone<sup>5</sup>.
- We welcome the policy support for tree-lined streets (paragraph 130) for the contribution they can make greening and addressing climate adaptation, subject to the detailed comments made by the RTPi in their submission.

## Transport

- The NPPF and NMDC should be aligned to support the excellent agenda emerging from the department of transport. The publication Gear Change<sup>6</sup> (DoT) states:

*“Cycling and walking will be the natural first choice for many journeys with half of all journeys in towns and cities being cycled or walked by 2030 ... Cycling is or will become mass transit and must be treated as such. Routes must be designed for larger numbers of cyclists, for users of all ages and abilities.”*

- Decarbonising Transport<sup>7</sup> (DoT) states:

*“To deliver the reduction in transport emissions needed for our interim carbon budgets and net zero, we will need to go further than the existing plans set out in this document. This is not optional; there is no plausible path to net zero without major transport emissions reductions, reductions that need to start being delivered soon.”*

- The planning system must play its part in realising these objectives, and be robust in moving away from car dependent development patterns and layouts and setting high expectations for infrastructure provision:
  - Land should be allocated for development, designed and laid out around the principle of presumed access on foot, by bike and by public transport. Local plans should maximise the potential for local living, close to shops, services and employment so people can meet their needs by walking and cycling. No development should be granted planning permission without demonstrating

that safe access can be provided to essential services on foot, by bike and public transport.

- All new development should be located and designed to generate zero transport emissions.
  - Local plans should set ambitious requirements for trip reduction and mode share targets and local authorities should proactively plan for the creation and expansion of coherent segregated cycle networks.
  - Significant new development must incorporate or fund segregated cycle routes from the outset and the NMDC should provide design guidance as to how they can be integrated into street layouts whilst meeting the standards set out in the publication Cycle Infrastructure Design<sup>8</sup> (DoT).
  - Urban and local centres should be prioritised for spatial interventions to reduce or prohibit through traffic to encourage place-making, walking and cycling and enable local economic activity and vibrancy.
- The proposed amended text at paragraph 11 (a) gives generalised support for sustainable patterns of development, but is not sufficiently robust to deliver on the government's agenda on transport decarbonisation.
  - Planning policy guidance on aviation should be updated in the light of the net zero commitment and the release of the 6th Carbon Budget, which advise that "steps should be taken to limit aviation growth in line with our scenarios" and that "aviation emissions should be included in the Sixth Carbon Budget and must be tackled alongside all other emissions". Local planning authorities require clearer policy indicating how they should assess the carbon emissions from airport growth, to ensure proposals are compatible with our national trajectory to net zero emissions, and our limited remaining national carbon budget. This would support local authorities in refusing proposals for airport expansion where they are incompatible with our carbon emission reduction commitments.

## **Renewable Energy**

- The current UK decarbonisation strategy relies on the electrification of heat generation and transport. Therefore the rapid decarbonisation of the electricity system is essential if the UK is to meet its carbon reduction commitments, and there is an over-riding responsibility for all communities to increase the use and supply of renewable energy, and a real economic opportunity.
- Local plans should 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.

- To support economic development and enable the transition to a zero carbon future, local plans must prepare a positive strategy for renewable and low carbon energy and heat which maximises the potential for suitable development. Strategies must examine the technical potential for all forms of mature, deployable renewable energy including, but not limited to onshore wind, solar, micro-hydro, clearly identify suitable areas for their development and proactively support community energy projects. Neighbourhood plans should be encouraged to address climate change, including through accelerating the rollout of renewable energy. Where possible, and where meaningful public consent can be fostered, plans should seek to quadruple current levels of renewable energy from current levels in line with CCC forecasting.
- Planning policy guidance should be updated to enable communities to bring forward onshore wind development, the cheapest form of electricity generation and a vital tool for engaging communities in the energy transition via community energy projects. Paragraph 157 (and footnote 53) should be clarified to ensure that a reasonable, proportionate and achievable bar is set for addressing planning impacts and gaining the backing of the local community. At present, these requirements are both unfeasibly high (and completely out of step with those on all other types of development, including fossil fuels and nuclear power, neither of which are required to gain the consent of their local community) and too vague, meaning that in practice they pose a serious block stopping almost all new wind developments in England. These requirements should be clarified to provide a clear way forward for new onshore wind projects in areas where the local community is in favour, without the ability for a small minority of dissenting voices to veto projects.

### **Oil, gas and coal exploration and extraction**

- All national planning guidance<sup>9</sup> around oil, gas and coal should be updated in the light of the net zero commitment and the 6th carbon budget, which recommends entirely phasing out unabated fossil fuel electricity generation by 2035<sup>10</sup>, following the coal phase out by 2024<sup>11</sup>. In addition, the 6th carbon budget projections for the end of greenhouse gas emissions from steel making by 2035, requires the strengthening of the existing presumption against the development of coal mines, whether thermal, industrial or coking coal<sup>12</sup>.
- Existing consents for infrastructure and extraction along with current levels of importation are sufficient to deal with a managed transition.
- Local plans should no longer be required to define areas for further extraction given the remaining limited timeframe.
- Welsh National Coal policy (PPW11<sup>13</sup>) is an excellent model and should be utilised in the NPPF. This recognises all the UK government's carbon reduction commitments, the realisation of the narrowing timeframe for emissions reduction and the vanishing economic need for coal arguments.

- We recommend this revised policy wording:

*216. Planning permission should not be granted for the extraction of coal, unless in [insert] **wholly exceptional circumstances**: a) the proposal is considered environmentally acceptable [insert] **specifically with regards to the achievement of binding UK and international greenhouse gas emissions reductions targets**<sup>14</sup> „or can be made so by planning conditions or obligations; or b) if it is not environmentally acceptable, then it provides national, local or community benefits which clearly outweigh.”*

## Conclusion

The NPPF must ensure that all decisions deliver on the 2050 net zero target providing a clear direction of travel that will drive the transformation in the design, location and energy systems of all new development. To this end the NPPF must make plain that all policies, plans and decisions must deliver on the objectives of the Climate Change Act. It is also crucial that the national planning guidance resource is urgently updated to reflect the implications of the climate crisis. Action is required now if the UK is have a credible leadership role in the COP 26 UN climate conference.

Yours sincerely

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Hugh Ellis, **TCPA**  
Dr Rebecca Windemer & Dave Tudgey, **Bristol Energy Network**  
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Roger Geffen, **Cycling UK**  
Magnus Gallie, **Friends of the Earth**  
Philippa Borrowman, **Green Alliance**  
Kate Conto, **The Ramblers**  
Naomi Luhde-Thompson, **Rights: Community: Action**  
Dan Nicholls, **SNRG**  
John Alker, **UKGBC**  
Emma Clarke, **Wildlife and Countryside Link**

The letter also incorporates input from South Lakes Action on Climate Change in respect of planning for oil, gas and coal exploration and extraction and input from Possible in respect of transport considerations.

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Since we submitted this response, on 21 March 2021, it has been endorsed by Mendip District Council, Eden District Council, the Association of Green Councillors, Bath & North East Somerset Council and Transport Action Network

## FOOTNOTES

- 1 Global Warming of 1.5°C – Summary for Policy Makers – Intergovernmental Panel on Climate Change  
[www.ipcc.ch/site/assets/uploads/sites/2/2018/07/SR15\\_SPM\\_version\\_stand\\_alone\\_LR.pdf](http://www.ipcc.ch/site/assets/uploads/sites/2/2018/07/SR15_SPM_version_stand_alone_LR.pdf)
- 2 [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/956094/Government\\_response\\_to\\_Future\\_Homes\\_Standard\\_consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/956094/Government_response_to_Future_Homes_Standard_consultation.pdf)
- 3 Local Authorities and the Sixth Carbon Budget – Committee on Climate Change - [www.theccc.org.uk/publication/local-authorities-and-the-sixth-carbon-budget/](http://www.theccc.org.uk/publication/local-authorities-and-the-sixth-carbon-budget/)
- 4 Local Authorities and the Sixth Carbon Budget – CCC (2020) [www.theccc.org.uk/publication/local-authorities-and-the-sixth-carbon-budget](http://www.theccc.org.uk/publication/local-authorities-and-the-sixth-carbon-budget)
- 5 [https://ca1-eci.edcdn.com/reports/ECIU\\_Zero\\_Carbon\\_Homes\\_Final.pdf](https://ca1-eci.edcdn.com/reports/ECIU_Zero_Carbon_Homes_Final.pdf)
- 6 Gear Change – Department of Transport (2020) [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/904146/gear-change-a-bold-vision-for-cycling-and-walking.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904146/gear-change-a-bold-vision-for-cycling-and-walking.pdf)
- 7 Decarbonising Transport consultation – Department of Transport (2020) [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/932122/decarbonising-transport-setting-the-challenge.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/932122/decarbonising-transport-setting-the-challenge.pdf)
- 8 Cycle Infrastructure Design LTN 1/20 - Department of Transport (2020) [www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120](http://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-120)
- 9 National Planning Policy Framework and associated Planning Practice Guidance
- 10 See p. 135 - The Sixth Carbon Budget The UK's path to Net Zero - [www.theccc.org.uk/wp-content/uploads/2020/12/The-Sixth-Carbon-Budget-The-UKs-path-to-Net-Zero.pdf](http://www.theccc.org.uk/wp-content/uploads/2020/12/The-Sixth-Carbon-Budget-The-UKs-path-to-Net-Zero.pdf)
- 11 End of coal power to be brought forward in drive towards net zero – BEIS press release 2020  
[www.gov.uk/government/news/end-of-coal-power-to-be-brought-forward-in-drive-towards-net-zero](http://www.gov.uk/government/news/end-of-coal-power-to-be-brought-forward-in-drive-towards-net-zero)
- 12 See p. 111 - Policies for the Sixth Carbon Budget and Net Zero - [www.theccc.org.uk/wp-content/uploads/2020/12/Policies-for-the-Sixth-Carbon-Budget-and-Net-Zero.pdf](http://www.theccc.org.uk/wp-content/uploads/2020/12/Policies-for-the-Sixth-Carbon-Budget-and-Net-Zero.pdf)
- 13 See para 5.10.14 - Planning Policy Wales: [https://gov.wales/sites/default/files/publications/2021-02/planning-policy-wales-edition-11\\_0.pdf](https://gov.wales/sites/default/files/publications/2021-02/planning-policy-wales-edition-11_0.pdf)
- 14 It is assumed that Scope 3 emissions from the burning of coal for either power generation or the industrial process for steel making will also be included in establishing whether such proposals are compatible with both UK and International GHG targets.



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