

# Why the government's new planning framework shouldn't water down action on climate change

The government is consulting on revisions to the National Planning Policy Framework (NPPF) which sets out its planning policies for England and overall vision for the planning system. The consultation is very important because the NPPF informs the plans drawn up by local councils and neighbourhood groups, and influences decisions on new development.

The draft is giving rise to a number of concerns, but we want to focus here on the proposals to water down and de-prioritise action on climate change.

We intend to respond in detail to the consultation, but in the meantime, here are some thoughts put together by one of our trustees Peter Ellis (see [www.cse.org.uk/trustees](http://www.cse.org.uk/trustees) for details).

The consultation period runs to 10 May 2018 and the full text of the proposed revisions can be found at [www.gov.uk/government/consultations/draft-revised-national-planning-policy-framework](http://www.gov.uk/government/consultations/draft-revised-national-planning-policy-framework).

We'd encourage anyone concerned about climate change to respond to the consultation via this link: [www.surveymonkey.co.uk/r/NPPFconsultation](http://www.surveymonkey.co.uk/r/NPPFconsultation) or by email ([planningpolicyconsultation@communities.gsi.gov.uk](mailto:planningpolicyconsultation@communities.gsi.gov.uk)).

## Building a strong, competitive economy

### Existing NPPF

18. The Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future.

### Proposed revisions, with comment

82. Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity

#### Comment ...

The reference to economic growth being low carbon has been deleted with nothing similar put in its place. Worryingly, the significant weight to be placed "on the need to support economic growth and productivity" could be used to justify unsustainable development proposals.



## Promoting sustainable transport

### Existing NPPF

**30.** Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion.



### Proposed revisions, with comment

**103.** Transport issues should be considered from the earliest stages of plan-making and development proposals

#### Comment

The paragraphs on transport expect the environmental impacts of traffic and transport infrastructure to be taken into account. Walking, cycling and public transport are encouraged but cutting greenhouse gases has been dropped as a specific objective.

## Requiring good design

### Existing NPPF

**65.** Local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design.

### Proposed revisions, with comment

**130.** In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they are sensitive to the overall form and layout of their surroundings.

#### Comment

The new paragraph 130 is welcome in itself but but subtle changes from extant policy mean that

- i) Support for a new generation of low carbon development has been watered down by being restricted to "outstanding or innovative designs", and
- ii) Low or zero carbon developments now have to be "sensitive to" the surrounding townscape. Does this mean "look the same as"? In the current NPPF mitigation through good design is sufficient.



## Meeting the challenge of climate change, flooding and coastal change

### Existing NPPF

**93.** Planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development.

### Proposed revisions, with comment

**147.** The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

#### Comment:

- i) Planning's contribution is downgraded from "plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions" to "helps to shape places in ways that contribute to". At a time when climate change is slipping off planners' radar this will not help.
- ii) We've lost the text that makes tackling climate change the 'golden thread' that should weave through the implementation of all NPPF policies: "This [tackling climate change] is central to the economic, social and environmental dimensions of sustainable development."

### Existing NPPF

**94.** Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, [footnote 16: In line with the objectives and provisions of the Climate Change Act 2008] taking full account of flood risk, coastal change and water supply and demand considerations.

### Proposed revisions, with comment

**148.** Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, , water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures [footnote 39: And within the context provided by the Climate Change Act 2008].

#### Comment:

- i) "Adopt proactive strategies" has been changed to "plans should take a proactive approach". This is probably not a significant change but "strategy" does imply more content and concerted action than "approach". To be consistent with other drafting in the revised NPPF, it should say "Planning policies and decisions should take a proactive approach".
- ii) The new footnote waters down previous expectation of proactiveness being in line with the Climate Change Act, ie strategies should be consistent with carbon reduction target and budgeting. "Within the context provided by" is nugatory because anything and everything is already in the context of extant legislation.
- iii) The inclusion of overheating is welcome, but planning's role in making liveable places in a changing climate should be clearer.



## Meeting the challenge of climate change, flooding and coastal change [cont]

### Existing NPPF

**95.** To support the move to a low carbon future, local planning authorities should:

- plan for new development in locations and ways which reduce greenhouse gas emissions
- actively support energy efficiency improvements to existing buildings; and
- when setting any local requirement for a building's sustainability, do so in a way consistent with the Government's zero carbon buildings policy and adopt nationally described standards.

### Proposed revisions, with comment

**149.** New development should be planned for in ways that: ... b) can help to reduce greenhouse gas emissions through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.

#### Comment:

- i) The clear instruction in the existing NPPF that "local authorities should plan for new development in locations and ways which reduce greenhouse gases" has been unnecessarily softened to "Development should be planned for in ways that can help to reduce greenhouse gas emissions through its location, orientation and design."

The "ways" to reduce greenhouse gas emissions are now limited to "location, orientation and design", whereas without these parameters the door was open to securing appropriate development mixes, getting the right low and zero carbon energy system in place and requiring new development to connect to these systems.

- ii) The revised text has lost the explicit support for energy efficiency improvements to existing buildings so, for example, in those instances when solid wall insulation requires consent because it changes the way a house looks, there is no policy counter weight to the potential conflict with local townscape policies.

### Existing NPPF

**96.** In determining planning applications, local planning authorities should expect new development to:

- comply with adopted Local Plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable;

### Proposed revisions, with comment

**152.** In determining planning applications, local planning authorities should expect new development to:

- a) comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable;

#### Comment

Widening to "development plan policies" welcome but why apply a proposal viability test when viability is in the future meant to be sorted at plan stage? Seems unreasonable to single out low and zero carbon energy.



### Existing NPPF

**97.** To help increase the use and supply of renewable and low carbon energy, local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources. They should:

- have a positive strategy to promote energy from renewable and low carbon sources;
- design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts;
- consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure the development of such sources [footnote 17 requirement to comply with NPS policy].

### Proposed revisions, with comment

**150.** To help increase the use and supply of renewable and low carbon energy and heat, plans should:

- a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);
- b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development;

#### Comment:

- i) Revised NPPF drops clarity that all communities have a responsibility to contribute to low and zero carbon energy generation.
- ii) The explicit mention of heat is welcome but pointless - heat is energy afterall; it would have been different if the NPPF had said power. And what is now meant by 'a positive strategy for energy from heat'?
- iii) "Design their policies to maximise renewable and low carbon energy development" becomes "maximises the potential for suitable development". Why the extra 'suitable' qualification?
- iv) The footnote has been dropped which is welcome as it no longer requires the use of ETSU for assessing the noise impact of wind turbines.

### Proposed revisions, with comment

**153.** When determining planning applications for renewable and low carbon development, local planning authorities should:  
...b) approve the application if its impacts are (or can be made) acceptable. For wind energy developments, this should include consideration of the local community's views. [Footnote 40 bringing in WMS policy for wind] ...

#### Comment

Surely the local community's views should be considered for any and all development proposals, not just wind energy developments?