

CONSULTATION RESPONSE: National Planning Policy Framework

September 2024

The UK Green Building Council represents the voice of the UK's sustainable built environment industry. It is a charity powered by more than 700 members from banks, large estate owners, housebuilders, and manufacturers to innovative startups, universities, local councils and government departments - all working to transform the built environment in the face of the climate, nature and cost-of-living crises.

The threat of climate and nature breakdown to the country and the world can't be overstated. This is the last government in a position to dramatically bring UK emissions down to help keep our world under 1.5 degrees of heating and prevent the worst impacts of global heating. Alongside this, the natural world is in collapse and with it the food and water systems we rely on. The places we live, work and play are ill-prepared for the increasingly violent floods and overheating already in train. Gas-based energy bills have spiralled out of control. Urgent and large-scale action is needed to protect our communities and reverse this damage.

We welcome this NPPF consultation and congratulate the Government for bringing it forward so quickly after so much delay. Updating the planning system is urgent. It provides a crucial opportunity to ensure all planning strategies and decisions contribute towards, not pull against, the Government's ambitions and legal obligations to achieve a zero-carbon future, protect households, communities, businesses and the wider economy from climate impacts and restore nature.

In this context, the NPPF proposals including a new 'Grey Belt' designation and the reinstatement of a five-year housing land supply requirement will need to go much further to reflect the Government's own stated urgency and commitment to decarbonise the economy, restore nature and deliver energy security and climate resilience. We hope our submission will help with that process.

In this response, drawn from wide consultation with our members, they also advocate for a clear legal alignment with the Climate Change and Environment Acts in the forthcoming Planning Bill and much stronger new building standards to put the country on track for success.

We welcome the opportunity to respond to this consultation and look forward to a response and further consultations in due course as the Government develops plans for longer-term and more profound reform.

Planning for the homes we need

Question 1: Do you agree that we should reverse the December 2023 changes made to paragraph 61?

Question 2: Do you agree that we should remove reference to the use of alternative approaches to assessing housing need in paragraph 61 and the glossary of the NPPF?

Question 3: Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?

Question 4: Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130?

Question 5: Do you agree that the focus of design codes should move towards supporting spatial visions in local plans and areas that provide the greatest opportunities for change such as greater density, in particular the development of large new communities?

Question 6: Do you agree that the presumption in favour of sustainable development should be amended as proposed?

Yes, the clear guidelines on when the presumption applies are useful. However, the lack of explicit direction on the weight of each factor may lead to ongoing disputes in planning decisions, especially in subjective areas like the impact on key landscapes. This could delay approvals and development. Providing detailed guidance is essential to ensure that development is genuinely sustainable and to prevent inappropriate construction in unsuitable locations.

Question 7: Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?

Question 8: Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF?

Question 9: Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?

Question 10: If yes, do you agree that 5% is an appropriate buffer, or should it be a different figure?

Question 11: Do you agree with the removal of policy on Annual Position Statements?

Question 12: Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?

Yes, strategic planning presents a significant opportunity to more comprehensively address key climate change mitigation, resilience and nature restoration issues, as it reflects the spatial geographies of natural processes and the scale at which many measures will need to be delivered. These include strategic transport planning, nature recovery and green infrastructure, catchment-based flood risk planning, and shoreline management. Strategic plans will provide an

opportunity to bring together currently fragmented issues and consider how they can be addressed spatially, whilst maximising opportunities to support climate resilience.

UKGBC supports strategic planning and would encourage value to be maximised through alignment of the anticipated Mayoral Spatial Development Strategies with Local Growth Plans, as part of the Government's plans for greater devolution. The bringing together of planning and economic development matters is an opportunity to develop fully costed and deliverable development proposals without creating additional layers and processes. Cross boundary and strategic planning should allow for more joined up and sensible approaches to sustainable planning, addressing issues of housing needs, infrastructure, integrated transport systems, and climate resilience through collaboration. Leveraging funding and capabilities at a regional level could bring forward major regeneration sites in the heart of existing towns and cities, minimising the need for new infrastructure, and at the same time reinvigorating brownfield sites.

Sustainable development must be non-negotiable, both in terms of the environmental and quality standards of housing, but also the spatial implications of this growth. We must ensure that every new home is fit for a sustainable, resilient future. Crucially, development and communities must be strategically located close to public transport, and walkable and cyclable distances, to key facilities, or have the correct provisions for electric vehicle charging nearby. Simply approving homes without regard for their location, as often happens, will undoubtedly lock in more unnecessary emissions related to transport choices - emissions we cannot afford to create. It would also exacerbate social and economic deprivation and isolation.

Question 13: Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?

Question 14: Do you have any other suggestions relating to the proposals in this chapter?

A new Standard Method for assessing housing needs

Question 15: Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?

Question 16: Do you agree that using the workplace-based median house price to median earnings ratio, averaged over the most recent 3-year period for which data is available to adjust the standard method's baseline, is appropriate?

Question 17: Do you agree that affordability is given an appropriate weighting within the proposed standard method?

Question 18: Do you consider the standard method should factor in evidence on rental affordability? If so, do you have any suggestions for how this could be incorporated into the model?

Question 19: Do you have any additional comments on the proposed method for assessing housing needs?

Brownfield, grey belt and the Green Belt

Question 20: Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports?

Yes, the new in-principle support for brownfield sites means that these sites will come forward as available quickly and should be prioritised for development, given their ready access to infrastructure and potential for higher building densities if in existing towns/cities. We would like to see this commitment delivered in reality with targets set for building on previously developed land and streamlining of the planning decision process in existing 2017 regulations and clarifying the Planning Practice Guidance for Brownfield Land Register sites eligible for Permission in Principle.

The in-principle support for brownfield sites should also be matched with in-principle support for retrofit of buildings as a first consideration, and developments that substantially reuse and refurbish existing buildings and structures. This will help ensure new developments are located appropriately, already connected to public transport, walking and cycling.

Question 21: Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of PDL in the Green Belt?

Yes, prioritising previously developed land is welcome as a general approach. To avoid urban sprawl and protect the Green Belt, we need to prioritise building more densely and concentrate development as much as possible on brownfield sites in existing urban areas.

CPRE's latest [State of Brownfield report](#) shows that, in 2022, there were over 27,000 hectares of brownfield land in England. That's enough to accommodate over 1.2 million homes. This approach will ensure that green space is protected, homes are built close to schools, shops and transport, and can breathe new life into empty spaces.

However, many brownfield sites have developed into biodiverse urban habitats that provide greenery that can be enjoyed by local communities for recreation. They can also be important areas to boost resilience to climate change by providing permeable surfaces to combat flooding and heat waves. Therefore, while brownfield sites should be developed as a priority, these should be assessed by the LPA and if appropriate require an ecological assessment to understand the benefits and disbenefits of development. Local plans should deliver an overall net biodiversity gain and decisively increase the proportion of green and absorbent surfaces in an area.

Question 22: Do you have any views on expanding the definition of PDL, while ensuring that the development and maintenance of glasshouses for horticultural production is maintained?

Question 23: Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?

No, we would recommend changes.

The definition of grey belt land as that which makes a 'limited contribution' to Green Belt purposes is too subjective and could lead to unintended consequences and damage of open green space. We feel it is an absolute requirement to see a clearer framework for what is and isn't grey belt without the risk of it being open to interpretation. The proposed review of Green Belt boundaries to meet housing needs is a significant departure from previous policies and is likely

to lead to contentious local plan examinations, especially in areas where Green Belt land plays a critical role in maintaining local character and preventing high-carbon urban sprawl. A clearer definition of grey belt is therefore vital to ensure the protection of the parts of the Green Belt that are high value areas of nature and play a significant role in reversing our declining biodiversity, storing carbon, producing food and allowing people access to nature. Considerations must also be made to land that is well connected to existing infrastructure and will contribute to a low carbon economy. This includes public transport links, walking and cycling services, and facilities for charging electric vehicles. There is also plenty of evidence that shows a greener transport system can also boost prosperity for the country. If done badly, without agreed assessment methodology or clear definition, grey belt land could lead to more speculative development by encouraging landowners to deteriorate undeveloped land that could be harnessed to create rich habitats such as wetlands and woodlands, which would benefit local communities, carbon sequestration, and flood mitigation.

Question 24: Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?

Yes, we need a Green Belt fit for a sustainable future, enhanced for people and the planet, not run down and then built on. The new grey belt criteria should be met with greening policies that seek to expand and regenerate existing areas of the Green Belt into improved habitat, wetlands and woodlands, and prioritise nature restoration. Green belt should continue to be protected from new development and only released under grey belt designation as a last resort after 'shovel-ready' brownfield sites have been prioritised, which [CPRE research](#) has shown could accommodate 1.2 million new homes.

Question 25: Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance?

Yes additional guidance is needed in both the NPPF and planning practice guidance to avoid serious damage to nature, climate and a backlash from communities.

Green Belt land should be released for a new Grey Belt designation and construction only in the most exceptional circumstances (see answers to Questions 23 and 24).

Land that currently provides significant biodiversity and ecosystems, land that is otherwise beneficial for the local community and land that is covered by Local Nature Recovery Strategies should be excluded.

An assessment should be made pre-development and before planning permission is granted. While there are some areas of developed land within the Green Belt that could be used to deliver needed housing, we must prioritise urban densification before building out into rural areas with poor access to infrastructure and local services.

We are concerned by the limited power proposed for local authorities to refuse planning permission on non-grey parts of the Green Belt. Additional guidance should be included in the NPPF itself.

If the local plans do not meet local housing needs, as defined, the tilted balance in favour of planning permission applies to applications. It becomes difficult for local authorities to refuse planning permission on developers' preferred sites, even if alternative Brownfield sites are available.

With similar priorities around 'Grey' land, this would now apply even to land still classed as green belt. Local authorities must be able to justify denying development on Green Belt land, which will create 'adverse impacts' such as biodiversity depletion, the release of sequestered carbon, and increased climate risk, just as they can now do on the grounds of transport links, design, and affordable housing policies.

Question 26: Do you have any views on whether our proposed guidance sets out appropriate considerations for determining whether land makes a limited contribution to Green Belt purposes?

Question 27: Do you have any views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced?

Given that brownfield sites have so much capacity to meet housing and other development needs, and given the dire state of nature's collapse, Local Nature Recovery Strategies (LNRS) should enhance Green Belt and be prioritised above development to further protect Green Belt land from development and grey belt designation. We recommend making LNRS mandatory in local plans and introducing a new planning designation to protect land designated for nature recovery. This would safeguard areas identified for habitat restoration from land use changes that could hinder nature recovery while allowing sustainable land uses to continue.

In addition, we recommend national policy strengthens smaller-scale nature interventions, which would enhance local nature recovery and act to enhance local areas lost to grey belt designation. The NPPF should set the strategic position for these interventions, with standards for interventions included in the anticipated National Development Management Policies:

Several key actions can be taken for developments across Green Belt, Brown Field and Grey Belt categories:

- **Enhance Policy Requirements:** Create more stringent planning policy requirements that mandate small-scale, no-regrets nature enhancement measures to be integrated into the design of proposals in response to local ecological needs as an absolute minimum. This would include the integration of features like bee and swift bricks, hedgehog highways, and bat boxes into new developments. Such measures are necessary for aligning development practices with the goals of the Environment Act and the Environmental Improvement Plan.
- **Promote Holistic Outcome-Based Approaches:** Establish national policies that require the realisation of the broader environmental benefits of nature interventions, such as air pollution reduction and urban cooling. This would go beyond biodiversity net gain and encompass overall environmental benefits.
- **Implement Urban Greening Factors (UGFs):** Require Local Planning Authorities (LPAs) to adopt urban greening factors that enhance access to nature. UGFs should be used to quantify and deliver green infrastructure requirements, providing flexibility for local adaptation while ensuring consistency across developments.

By implementing these measures, national policy can better support the integration of small-scale, locally-led nature interventions in new developments, ensuring they contribute effectively to environmental goals and local needs.

Question 28: Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations?

Question 29: Do you agree with our proposal to make clear that the release of land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole?

Question 30: Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?

Question 31: Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision-making, including the triggers for release?

Question 32: Do you have views on whether the approach to the release of Green Belt through plan and decision-making should apply to traveller sites, including the sequential test for land release and the definition of PDL?

Question 33: Do you have views on how the assessment of need for traveller sites should be approached, in order to determine whether a local planning authority should undertake a Green Belt review?

Question 34: Do you agree with our proposed approach to the affordable housing tenure mix?

Question 35: Should the 50 per cent target apply to all Green Belt areas (including previously developed land in the Green Belt), or should the Government or local planning authorities be able to set lower targets in low land value areas?

Question 36: Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?

The Green Belt should be preserved in all but the most exceptional circumstances. Offsetting the impact on nature and the public should not be considered as a shortcut to protecting existing green spaces.

But in the rare exceptions here Green Belt is 'released' for construction projects yes. We would further welcome these green spaces to take into account resilience to climate change, providing sustainable urban drainage and permeable surfaces to prevent increasingly frequent flood events as well as shading and provision of comfortable microclimates to provide refuge from heat waves.

Question 37: Do you agree that Government should set indicative benchmark land values for land released from or developed in the Green Belt, to inform local planning authority policy development?

Question 38: How and at what level should Government set benchmark land values?

Question 39: To support the delivery of the golden rules, the Government is exploring a reduction in the scope of viability negotiation by setting out that such negotiation should not occur when land will transact above the benchmark land value. Do you have any views on this approach?

Question 40: It is proposed that where development is policy compliant, additional contributions for affordable housing should not be sought. Do you have any views on this approach?

Question 41: Do you agree that where viability negotiations do occur, and contributions below the level set in policy are agreed, development should be subject to late-stage viability reviews, to assess whether further contributions are required? What support would local planning authorities require to use these effectively?

Question 42: Do you have a view on how golden rules might apply to non-residential development, including commercial development, travellers sites and types of development already considered 'not inappropriate' in the Green Belt?

Question 43: Do you have a view on whether the golden rules should apply only to 'new' Green Belt release, which occurs following these changes to the NPPF? Are there other transitional arrangements we should consider, including, for example, draft plans at the regulation 19 stage?

Question 44: Do you have any comments on the proposed wording for the NPPF (Annex 4)?

Question 45: Do you have any comments on the proposed approach set out in paragraphs 31 and 32?

Question 46: Do you have any other suggestions relating to the proposals in this chapter?

Viability: The NPPF should give priority to addressing climate change and reversing the breakdown of nature, and reform the viability assessment process to ensure that climate policy commitments are not watered down on the grounds of cost. Many policy requirements, such as energy efficient homes and flood resilience measures, are cheaper to install initially and very expensive to retrofit. The current system does not account for costs (and potential savings, e.g. from lower energy bills) and misconstrues high climate policy standards. This acts as a disincentive to build climate resilience into new development and falsely positions climate and affordable housing objectives in opposition. Where higher environmental and social standards are introduced, developers very quickly find ways to bring costs down through rapid innovation, learning and development curves, and any additional costs are usually absorbed by the land price rather than developers or even households.

Additionally, whilst the government is correct to prioritise a brownfield-first approach, which has the potential to deliver 1.2 million homes, instead of setting housing targets that encourage speculative development, we need ambitious standards for brownfield sites, increasing the number of homes for social rent, and ensuring genuinely sustainable and affordable housing. The Government must involve communities as active partners in addressing issues such as reduced carbon and air pollution, nature restoration and climate adaptation, and health and inequalities. Local plans should reflect communities' goals for climate change, nature recovery, and community energy in line with national carbon budgets. To achieve this, national policy needs to be responsive to community needs, including by facilitating site allocations that can enable meaningful local action.

The success of these ambitious changes very much depends on the capacity of local authorities to deliver up-to-date local plans and provide consistency in decision-making. We are pleased that the Government has announced an additional £20 million for funding 300 new planning

officers. However, whilst the median salary of a planner is £33,000¹ and median recruitments costs are up to £3,000², the salaries of planners have significantly declined in real terms since 2005 and local authorities struggle to recruit and retain mid to senior grade planners, with a quarter of planners moving to the private sector between 2009 and 2020³. To avoid this experience shortfall in Local Planning Authorities, additional investment is needed for planning officers, skills and training to ensure skilled, rapid planning and decision-making.

Delivering affordable, well-designed homes and places

Question 47: Do you agree with setting the expectation that local planning authorities should consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements?

Yes. There is a housing affordability crisis in this country.

Question 48: Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?

Yes. The removal of the explicit requirement for ownership is supported, as this can be a barrier to the provision of more social rented accommodation and other much-needed tenures of significant social value.

Question 49: Do you agree with removing the minimum 25% First Homes requirement?

Question 50: Do you have any other comments on retaining the option to deliver First Homes, including through exception sites?

Question 51: Do you agree with introducing a policy to promote developments that have a mix of tenures and types?

Yes. This is very important for social inclusion, layering of different purchase and rental opportunities for life stages, and positive health outcomes.

Question 52: What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments?

Question 53: What safeguards would be required to ensure that there are not unintended consequences? For example, is there a maximum site size where development of this nature is appropriate?

Question 54: What measures should we consider to better support and increase rural affordable housing?

Question 55: Do you agree with the changes proposed to paragraph 63 of the existing NPPF?

Question 56: Do you agree with these changes?

¹ [2023 RTPI report](#)

² [2022 CIPD report](#)

³ [2023 RTPI report](#)

Question 57: Do you have views on whether the definition of 'affordable housing for rent' in the Framework glossary should be amended? If so, what changes would you recommend?

Question 58: Do you have views on why insufficient small sites are being allocated, and on ways in which the small site policy in the NPPF should be strengthened?

Question 59: Do you agree with the proposals to retain references to well-designed buildings and places, but remove references to 'beauty' and 'beautiful' and to amend paragraph 138 of the existing Framework?

We have previously endorsed the 'Building Better, Building Beautiful' Commission's (BBBBC) recommendations to emphasise beauty in planning policies, and its removal would need to be backed with an alternative that details how it would ensure high quality, community-supported projects that align with local aesthetic and placemaking goals. The shift of reference to 'well-designed' buildings and places must be met with sharper focus on design quality and addressal of broader social and environmental concerns in planning:

- **Higher new build standards:** bringing in immediate improvements to building regulations as recommended in [our response to the FHBS consultation](#) will ensure that all new developments consist of homes and buildings that are comfortable to live in, affordable to run, and at the cutting edge of low- and zero-carbon. In addition, ensuring that local authorities are sufficiently equipped, resourced, and empowered to create and support the implementation of design codes, as well as existing standards and policies, will be of paramount importance to ensuring more well-designed development in practice.
- **Green infrastructure:** evidence shows that green infrastructure and greenery improve health and well-being, and buyers are willing to pay more for properties in greener areas. To maximize aesthetic and well-being benefits, it is essential to incorporate nature-enhancing features such as public greenspaces, quality gardens, street trees, and green walls. We recommend integrating green infrastructure standards and frameworks (such as the Urban Greening Factor - see response to Question 27) into planning policies to support the objectives of the Environment Act and Environmental Improvement Plan.
- **Social value:** the Public Services (Social Value) Act means social value has gained importance in construction and property, which requires local authorities in England to consider social value in significant service contracts. Incorporating social value in planning could help local authorities achieve their strategic goals by enhancing community strength, health outcomes, and local economies, all of which contribute to well-designed places.

Question 60: Do you agree with proposed changes to policy for upwards extensions?

Yes. We agree with the proposed changes to upwards extensions, as they offer a sustainable, appropriate way to improve densities and deliver residential development. However, as per the recommendations of the 'Living Tradition' report by Create Streets⁴, it is vital that suitable safeguards are put in place and integrated into planning policy. Upward extension offers a useful moment to conduct additional sustainable works and improvements (insofar as it is related to the development), at a time when construction-related disruption is already taking place:

⁴ <https://www.createstreets.com/wp-content/uploads/2021/08/Living-Tradition.pdf>

- A Net Zero whole life carbon approach should be imposed on all building work, meaning that builders will have to minimise gross carbon emissions in construction, optimise energy efficiency in buildings, and offset any emissions they do produce.
- Associated planning guidance should be developed to ensure upwards extensions support progress to the UK's net zero target, including matters such as lifecycle carbon emissions, embodied carbon, sustainable energy, passive cooling including shade and ventilation, and low carbon heating to avoid future retrofitting, damp, and overheating.
- Extensions will be an opportunity to ensure that buildings with poorly insulated roofs that are prone to high heat loss and gain are replaced with well-insulated roofs.

Question 61: Do you have any other suggestions relating to the proposals in this chapter?

It's promising to see a commitment to increasing the delivery of affordable and social housing, but many homes labelled as 'affordable' are often not in step with the local communities' needs. This requires redefining 'affordable' housing in the National Planning Policy Framework (NPPF) to align with average local incomes. This issue extends beyond a housing crisis to an affordability crisis, making it crucial to ensure that 'affordable' means truly affordable for local people in national planning policy.

Building infrastructure to grow the economy

Question 62: Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?

Question 63: Are there other sectors you think need particular support via these changes? What are they and why?

Yes, we would propose the inclusion of charging hubs for electric vehicles, which are a growing part of a modern economy, and one in which zero carbon transport involves increased numbers of electric vehicles on the roads.

Question 64: Would you support the prescription of data centres, gigafactories, and/or laboratories as types of business and commercial development which could be capable (on request) of being directed into the NSIP-consenting regime?

Question 65: If the direction power is extended to these developments, should it be limited by scale, and what would be an appropriate scale if so?

Question 66: Do you have any other suggestions relating to the proposals in this chapter?

Delivering community needs

Question 67: Do you agree with the changes proposed to paragraph 100 of the existing NPPF?

Question 68: Do you agree with the changes proposed to paragraph 99 of the existing NPPF?

Question 69: Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?

Question 70: How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?

National planning policy would more effectively support local authorities in promoting healthy homes and communities if health were explicitly defined as a strategic priority in the NPPF. The NPPF should clearly state that planning aims to enhance population and planetary wellbeing, focus on health and reduce inequalities, and that all planning policies and decisions must align with local health priorities and strategies. By emphasizing this at the start of the NPPF, it would underscore that fostering good health is a core purpose of planning, not just an added benefit. This could be achieved by integrating support for the UN Sustainable Development Goals into planning at all levels.

Prioritising developments with existing good connections to cycle lanes, in walking distance to public services including health services, and public transport and with access to green spaces will be critical. The toll that air pollution from Internal Combustion Engine (ICE) vehicles and gas cooking has on public health is now well established, so reducing the need for ICE car use and requiring electric heating rather than gas connections to new developments would bring significant benefits.

Question 71: Do you have any other suggestions relating to the proposals in this chapter?

Enhance the emphasis on incorporating health promotion and reducing health inequalities in policy making and decision-making, particularly when addressing locally identified health and wellbeing needs and priorities as outlined in joint strategic needs assessments and local health and wellbeing strategies. This means encouraging the creation of places that are complete, compact and connected so that most people can access the things they need for day-to-day living within easy walking, wheeling and cycling distance of their homes.

Utilise the health benefits of green infrastructure and require all new development to help achieve the government's statutory commitment (as per the Environment Act 2021) that everyone should live within a 15-minute walk of green or blue spaces by following the national [Green Infrastructure Standards Framework](#) and local nature recovery strategies.⁵

Supporting green energy and the environment

Question 72: Do you agree that large onshore wind projects should be reintegrated into the NSIP regime?

Yes, UKGBC supports a strategic approach to planning and delivering renewable energy infrastructure, as seen in the regional energy plans currently being consulted by OFGEM. The planning system should integrate renewable energy within a broader spatial framework that aligns with national and regional priorities, and we agree with the government on the need for an efficient planning route for energy projects to meet net-zero targets.

⁵ <https://www.tcpa.org.uk/collection/the-20-minute-neighbourhood/>

This drive for a fully decarbonised electricity system should be complemented by clear standards and requirements for new developments to be built to the highest efficiency standards and low carbon heating methods to ensure energy demand is kept to a minimum and the new grid operates at maximum efficiency.

Question 73: Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?

Yes. 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. To support economic development and enable the transition to a zero carbon future, local plans should utilise strategic planning to prepare a positive strategy for renewable and low carbon energy and heat that 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 identifying 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.

UKGBC supports the revised paragraph 161, which requires local plans to designate suitable areas for renewable and near zero carbon energy sources. This change will ensure that opportunities for renewable energy are thoroughly considered during planning, leading to the identification of the most appropriate sites. We also endorse the enhanced emphasis on renewable energy generation in paragraph 164.

We recognise that the current wording in the NPPF has effectively acted as a barrier to onshore wind development, which is crucial for achieving net-zero targets. Although the previous requirements for community consent were overly restrictive and disproportionately affected onshore wind projects, it is still important for communities to have a role in shaping local development, including renewable energy projects. We urge the government to explore ways for communities to engage meaningfully in renewable energy planning and to benefit from these developments. Promoting community-led energy initiatives should be a key component of this engagement.

If more schemes are likely to be decided by local authorities, appropriate resourcing and clear guidance will help LPAs are clear on how to balance the possible impacts (e.g. visual, heritage) against the benefits of larger scale onshore wind and solar developments. This will require greater investment into adequate resourcing and an appropriately skilled workforce in order to ensure the regimes are dealing with applications consistently in a way that reflects the transition to clean energy as a national priority

Question 74: Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?

Yes. A crucial role of the planning system is to evaluate the suitability of different land uses. To make informed decisions, it is essential to have a clear understanding of the current functions that land provides. Developing renewable energy sites on land that delivers critical ecosystem

services, such as habitats and carbon sequestration, would be inappropriate if it compromises these functions. Currently, there is no requirement to consider carbon impacts, including the benefits of land that contributes to carbon sequestration, during planning and decision-making. Incorporating such evidence would help identify and protect land with significant carbon sequestration value.

Question 75: Do you agree that the threshold at which onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?

Question 76: Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50MW to 150MW?

Question 77: If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be?

Question 78: In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?

UKGBC concurs with the government on the significant role that the planning system plays in advancing climate change mitigation and adaptation. However, the current planning system in England is inadequate for addressing the scale and urgency of these challenges, and urgent reforms are necessary.

We propose that the government's planning reform agenda should focus on the following three key areas:

1. **Prioritise Climate Action:** The planning system should emphasise climate action by defining its role in the NPPF to highlight the importance of planning in addressing climate change and securing a sustainable future.
2. **Incorporate Carbon Impact:** Spatial strategies in Local Plans and development proposals must account for their carbon impacts and this information should guide both plan-making and decision-making.
3. **Enhance Resilience and Adaptation:** The NPPF should be revised to provide clearer direction and greater urgency on how planning and development can support climate resilience and adaptation.

A [research report](#) by the TCPA and Centre for Sustainable Energy for the Climate Change Committee found that most local plans are not fit for purpose in addressing climate change, and many of those in production are not considering mitigation and adaptation measures holistically. It demonstrated that the current planning system is not delivering with the necessary speed and ambition to align with the government's wider climate change objectives.

The following suggestions will enable national planning policy to address climate change mitigation and adaptation and should be prioritised by this Government:

- Legal alignment with the Climate Change Act. Enhance policy wording to clearly emphasise and prioritise compliance with the Climate Change Act. Currently, this legal requirement is dispersed across various planning acts and only mentioned in a footnote within the NPPF, which makes its intent and purpose ambiguous. As a result, it is often deprioritised by planning authorities and receives minimal attention from planning inspectors during appeals and plan reviews. This requirement should be integrated

directly into the NPPF for plan-making and could also be included in the anticipated National Development Management Policies (NDMP) for decision-making.

- Carbon accounting and assessment must be integrated into planning as a foundation of the planning system's approach to climate mitigation. This should include for plan making and decision making. Please see response to Question 79 for more details.
- Reverse the effects of the 13 December 2023 Written Ministerial Statement (WMS). This was identified as a barrier by the Climate Change Committee in its [most recent progress report](#): 'A December 2023 written ministerial statement introducing new requirements for planning policies that propose local energy efficiency standards for buildings that go beyond national standards is likely to cause further confusion and delays around adopting local Net Zero policies, which is a setback'. The WMS imposes an undue restriction on local plans' ability to mandate highly energy-efficient new buildings. This should be addressed by the new Government, and NPPF policy that allows local authorities to set higher, energy-based targets within an agreed framework, to achieve net zero operational buildings, provided they can demonstrate viability, should be introduced.
- The Future Homes and Building Standards consulted on earlier this year does not go far enough to support climate mitigation and adaptation. The forthcoming [UK Net Zero Carbon Buildings Standard](#) provides an opportunity to create cross-sector understanding of buildings truly fit for Net Zero. Once published, this should be referenced and promoted in the NPPF.
- No more oil, gas, and coal extraction. All national planning policy and guidance 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, following the coal phase out by 2024. Chapter 17 of the NPPF requires an urgent rewrite to limit new or expanded sites for oil, gas and coal extraction.
- More comprehensive reference to climate adaptation. There is no guidance on relocation due to coastal change and sea level rise impacts, there is insufficient policy strength for the prevention of development in flood risk areas, and there is a gap on the policy needed for adaptation to increasing heat issues, particularly in urban areas. It is irresponsible of the Government to fail to support communities and businesses to prepare and understand the level of risk and climate impact that they face. More guidance is required for local plans and planning proposals expected to take adaptation and resilience measures. A new legal duty for adaptation in the Levelling Up and Regeneration Bill to address issues of climate resilience and prevent the future cost of failing to act to protect against climate change impacts.
- Complementary changes should be made to Permitted Development Rights to support high quality retrofit of existing buildings. When 1 in 10 tons of carbon emissions from our national economy already comes from the unregulated embodied carbon emissions from construction, existing buildings should be seen as valuable social and economic assets to be re-imagined and repurposed to meet the needs of communities. This will require joined-up decision making with a focus on place-making that duly considers impacts on residents and the environment.

Question 79: What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?

UKGBC strongly advocates for the integration of consistent carbon impact assessment and carbon accounting requirements in planning processes, including plan making, and planning decision making. This was emphasised in our response to the [previous government consultation](#) on the principle of introducing carbon impact assessments into the planning process in late 2022. There was 'strong support' from respondents for the introduction of carbon impact assessments and promotion of a standardised approach. We would also encourage the introduction of local carbon budgets, so that local authorities understand how much of the carbon budget is 'spent' and the parameters within which they need to work to reach net zero. Our members emphasise that this must be introduced in a streamlined and consistent way to make the process easy, reliable, and more predictable.

Carbon accounting is one of the most powerful improvements to the planning system to support climate mitigation, and urgent action must be taken to address the fact that we are currently operating a system where plans are adopted, and decisions are made, with no understanding of the carbon impacts of development within local and national carbon budgets. Clear legal alignment of the NPPF with the Climate Change Act (see response to Question 78) would establish a consistent framework for integrating climate mitigation into planning and the NPPF should be updated to include requirements for carbon auditing and emissions reduction, providing a clear methodology for carbon handling in planning processes. The creation of a 'carbon reduction delivery test' or 'Net Zero test' at Local Plan Examination is needed to ensure plans align with the UK's legally binding Net Zero commitments.

Whilst we are not in a position to recommend a specific tool the government could adopt, there are several tools already being used by local authorities to inform their plans, which demonstrates a readiness and willingness to adopt such methods as standard practice:

- [Bioregional have developed a tool](#) that models the spatial implications of proposed growth options, so that local authorities can understand the annual carbon footprint that would be generated from the spatial distribution of growth, depending on where development takes place and what policies are applied to it.
- Greater Cambridge Shared Planning developed a [net zero evidence base](#) for their local plan, drawing on recommendations from the IPCC, the CCC and the Tyndall Centre, which provides a Paris-aligned carbon budget for UK local authority areas. The authority then analysed the contribution of different policy options in meeting these targets to inform local plan policy development.
- [The SCATTER tool](#) has been developed to help local authorities calculate greenhouse gas inventories and report on carbon emissions, and also model carbon reduction pathways. Over 300 authorities are using this tool.
- The [RICS Whole Life Carbon assessment](#) provides consistent and accurate carbon measurement in the built environment. Using this allows local authorities to measure whole-life carbon emissions, manage carbon budgets, reduce life cycle emissions and deliver a net-zero future for the built environment.
- Several local authorities, including Enfield, Essex, Cornwall, and Bath & North East Somerset, have undertaken modelling of various building typologies to evaluate the

carbon impacts of different design standards and to show that achieving net zero buildings is feasible.

The challenge will be to bring together the best parts of existing tools, or drawing out from established modelling tools, in order to achieve a comprehensive carbon assessment system. A lack of consistent methodology risks unreliable carbon assessments and planning decisions. Our members have highlighted that greater consistency and clarity of approach to carbon in the planning system would be welcome, and supported across the industry, as reflected in the recommendations of [UKGBC's Whole Life Carbon Roadmap](#). Likewise in [response to the previous planning white paper](#), over 100 of our members signed a joint letter calling for net zero to be at the heart of the planning system, with a strong recommendation for the integration of a clear, consistent methods for carbon accounting and handling in the planning system. Training and upskilling on an agreed methodology will be required for local authorities, with priority given to those not currently conducting carbon accounting, to ensure that LPAs are empowered to make better strategic decisions on where to locate development.

Consistent Government guidance on the scope and implementation of carbon accounting in plan-making will act as a catalyst for advancing necessary technologies and ensure a consistent approach that supports local planning authorities and the broader sector. This requirement would also prompt a thorough consideration of climate legislation in planning appeals and examinations. The current scenario—where local plans and planning applications are approved without assessing their carbon impact—cannot persist, as it undermines the legal obligation for local plans to contribute to climate change mitigation and adaptation.

Question 80: Are any changes needed to policy for managing flood risk to improve its effectiveness?

While flood risk mitigations may be approved at the planning stage, their actual delivery is not guaranteed. The Environment Agency's ongoing scrutiny ensures some measures, like raised floor levels, are implemented, but oversight is inconsistent for other mitigations, especially for surface water management. While conditions are crucial for ensuring flood resilience, research has shown effectiveness is hampered by complex post-consent processes and limited resources for oversight and it would be more effective to integrate resilience strategies into the initial planning process.⁶

We recommend that the government implements the following changes to enhance the planning system's effectiveness in managing flood risk and coastal change:

- **Immediate Enactment of Schedule 3:** Schedule 3 of the Flood and Water Management Act 2010 should be fully resourced and enacted without delay. Additionally, the National Planning Policy Framework (NPPF) should be reviewed to ensure proper delivery and oversight of Sustainable Drainage Systems (SuDS).
- **Increased Emphasis on Shoreline Management Plans:** Shoreline Management Plans should play a more significant role in the planning process to ensure that plans and decisions align with long-term coastal change projections.
- **Development of Policy Tools for Consistency:** Tools such as National Development Management Policies, Planning Practice Guidance (PPG), or model conditions should be

⁶ <https://www.tcpa.org.uk/wp-content/uploads/2024/08/TCPA-Delivering-Flood-Resilience-Report-Sept-2024.pdf>

developed to promote the consistent application of conditions for flood resilience measures.

- **Stronger Requirements for Strategic Flood Risk Assessments:** Local planning authorities should face stricter requirements to maintain up-to-date Strategic Flood Risk Assessments (SFRAs).
- **Integration of Coastal Risk into SFRAs:** Coastal risk should be incorporated into SFRAs in coastal areas, including an evaluation of the long-term viability of coastal defences. Additionally, guidance for site-specific Flood Risk Assessments should be revised to clarify required mitigations, making them easier to enforce through planning conditions.
- **Mandatory Property Flood Resilience Standards:** The government should explore the possibility of establishing a mandatory minimum standard for property flood resilience measures within building regulations.

Question 81: Do you have any other comments on actions that can be taken through planning to address climate change?

The failure of planning to effectively address climate change stems from a range of complex and interconnected factors. While reviewing national planning policy is an important initial step, it is not enough on its own. A comprehensive approach also requires:

- **Reviewing the legal framework** for addressing climate change through planning.
- **Enhancing guidance for planning practitioners** to better incorporate various climate change considerations.
- **Developing a long-term strategy** to address skills and resource challenges across key agencies and authorities, enabling a more proactive rather than reactive approach to planning.

~~**Question 82:** Do you agree with removal of this text from the footnote?~~

~~**Question 83:** Are there other ways in which we can ensure that development supports and does not compromise food production?~~

~~**Question 84:** Do you agree that we should improve the current water infrastructure provisions in the Planning Act 2008, and do you have specific suggestions for how best to do this?~~

~~**Question 85:** Are there other areas of the water infrastructure provisions that could be improved? If so, can you explain what those are, including your proposed changes?~~

~~**Question 86:** Do you have any other suggestions relating to the proposals in this chapter?~~

Changes to local plan intervention criteria

~~**Question 87:** Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?~~

Question 88: Alternatively, would you support us withdrawing the criteria and relying on the existing legal tests to underpin future use of intervention powers?

Changes to planning application fees and cost recovery for local authorities related to Nationally Significant Infrastructure Projects

Question 89: Do you agree with the proposal to increase householder application fees to meet cost recovery?

Question 90: If no, do you support increasing the fee by a smaller amount (at a level less than full cost recovery) and if so, what should the fee increase be? For example, a 50% increase to the householder fee would increase the application fee from £258 to £387.

If Yes, please explain in the text box what you consider an appropriate fee increase would be.

Question 91: If we proceed to increase householder fees to meet cost recovery, we have estimated that to meet cost-recovery, the householder application fee should be increased to £528. Do you agree with this estimate?

Yes

No = it should be higher than £528

No = it should be lower than £528

no - there should be no fee increase

Don't know

If No, please explain in the text box below and provide evidence to demonstrate what you consider the correct fee should be.

Question 92: Are there any applications for which the current fee is inadequate? Please explain your reasons and provide evidence on what you consider the correct fee should be.

Question 93: Are there any application types for which fees are not currently charged but which should require a fee? Please explain your reasons and provide evidence on what you consider the correct fee should be.

Question 94: Do you consider that each local planning authority should be able to set its own (non-profit making) planning application fee?

Please give your reasons in the text box below.

Question 95: What would be your preferred model for localisation of planning fees?

Full Localisation = Placing a mandatory duty on all local planning authorities to set their own fee.

Local Variation = Maintain a nationally-set default fee and giving local planning authorities the option to set all or some fees locally.

Neither

Don't Know

Please give your reasons in the text box below.

Question 96: Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider planning services?

If yes, please explain what you consider an appropriate increase would be and whether this should apply to all applications or, for example, just applications for major development?

Question 97: What wider planning services, if any, other than planning applications (development management) services, do you consider could be paid for by planning fees?

Question 98: Do you consider that cost recovery for relevant services provided by local authorities in relation to applications for development consent orders under the Planning Act 2008, payable by applicants, should be introduced?

Question 99: If yes, please explain any particular issues that the Government may want to consider, in particular which local planning authorities should be able to recover costs and the relevant services which they should be able to recover costs for, and whether host authorities should be able to waive fees where planning performance agreements are made.

Question 100: What limitations, if any, should be set in regulations or through guidance in relation to local authorities' ability to recover costs?

Question 101: Please provide any further information on the impacts of full or partial cost recovery are likely to be for local planning authorities and applicants. We would particularly welcome evidence of the costs associated with work undertaken by local authorities in relation to applications for development consent.

Question 102: Do you have any other suggestions relating to the proposals in this chapter?

The future of planning policy and plan making

Question 103: Do you agree with the proposed transitional arrangements? Are there any alternatives you think we should consider?

Question 104: Do you agree with the proposed transitional arrangements?

Question 105: Do you have any other suggestions relating to the proposals in this chapter?

Public Sector Equality Duty

Question 106: Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. Is there anything that could be done to mitigate any impact identified?

Introducing higher environmental and social standards for new developments is a huge opportunity for skilled, quality jobs in every part of the country and for the sustainable built environment sector that forms our membership. Higher standards will drive innovation and the development of skills and supply chain solutions, which in turn brings down costs and makes faster progress towards meeting climate targets. [CITB's report Building the Skills for Net Zero](#) suggests that truly aligning development with net zero will create 350,000 new jobs in the construction industry.

Those businesses, local authorities, social housing providers, designers, manufacturers and engineering firms who have invested in high standards will welcome national policy that sets a fair, more streamlined, consistent and sustainable level playing field.

If you have any questions about the answers in this consultation please contact Kirsty Girvan on policy@ukgbc.org.