

Rt Hon Angela Rayner MP

Secretary of State for Housing, Communities and Local Government and Deputy Prime Minister

Ministry for Housing, Communities and Local Government

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30 July 2024

Dear Secretary of State,

Planning for climate change in England

We write to you as representatives of organisations in England who have been active in promoting and supporting a robust planning system for people and tackling climate change, many of us as members of coalitions active since 2002. We welcome the consultation on the National Planning Policy Framework that has been published today and will respond in detail in due course.

Climate change is the greatest long-term challenge facing the world today. We hope that addressing climate change will be the Government's principal concern for both the town and county planning and the nationally significant infrastructure regimes. Planning is a key tool for delivering your objectives for a green economy, as it sets a floor and guides the direction for infrastructure development.

We welcome the open letter that you sent jointly with the Secretary of State for the Environment highlighting your Government's commitment to prioritising nature recovery alongside overhauling the planning system and reaching net zero.

We welcome your commitment to exemplary standards for buildings in your manifesto. The immediate priority is to clarify the situation for local plans with net zero homes policies. We suggest the following paragraph that would support the leadership shown by local authorities in this area, and creates an effective transition

towards the mandatory exemplary building standards referenced in your manifesto, and as envisaged by the last Labour government, albeit ten years later than planned.

The 2021 Part L uplift to the Building Regulations sets national minimum energy efficiency standards for new buildings. Local authorities may set local energy performance standards that go further than national standards in their Local Plans, through powers granted by the Planning & Energy Act 2008.

Where plan policies go beyond current or planned building regulations, these should be expressed through industry recognised metrics. Acceptable approaches include setting targets for energy based metrics (expressed in kWh/m²/yr (GIA) as total energy use intensity (EUI) and space heating demand (SHD)), or applying a percentage uplift of a dwelling's Target Emissions Rate (TER).

In order to reflect your ambition to help business and communities build a net zero carbon future and prepare for the impacts of climate change, we suggest that planning policies and all planning decisions must be in line with the objectives and provisions of the Climate Change Act 2008, including the 2050 net zero carbon target, our binding Nationally Determined Contribution (NDC) under the Paris Agreement, and the detailed provisions of the Sixth Carbon Budget.

We welcomed Labour's support for these amendments during the passage of the Levelling Up and Regeneration Act.

We support the following actions:

- Development plan policies must, taken as a whole, be assessed for their carbon impact to ensure that locally determined contributions on carbon reduction demonstrably deliver on the sixth carbon budget. Clear carbon reduction targets in all development plan documents are vital in achieving this goal. Plans which cannot demonstrate a credible and evidenced policy framework to deliver the necessary carbon reductions must not be judged sound at local plan examination.
- National planning policy in respect of health and wellbeing, transport, and air quality need to be updated to deliver on these carbon reduction commitments. It is clear that the location of new developments can make a significant contribution to reducing transport emissions.
- Planning applications which accord with up to date plan policy should be approved promptly. Where decisions are taken which do not accord with local plan policy it is for the applicant to demonstrate how their proposals would accord with the carbon reduction targets established in the local plan. Applications which cannot demonstrate such compliance must be refused.
- Development plan policies must prioritise the long-term climate resilience of communities. This means building the capacity of people and places to plan

for, better protect, respond to, and recover from flooding, coastal change and extreme temperatures, through best land use and development choices. It is essential that plans focus on the delivery of consistent, measurable outcomes that can be achieved in the next Adaptation Programme reporting period (2023–2029), to support resilient investment across the built environment.

- National planning policy needs to prioritise measures which support nature recovery for example by providing strong support for nature-based solutions to reduce flooding and additional protections for habitats such as peatlands and woodlands in recognition of the significant contribution these habitats make to carbon sequestration.
- National planning guidance around oil, gas and coal now needs to be updated in the light of the net zero commitment and the Sixth Carbon Budget, which recommends entirely phasing out unabated fossil fuel electricity generation by 2035, following coal phase out by 2024. In addition, the Sixth 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.

We appreciate your consideration for the matters we have raised and would welcome a meeting to discuss further if this is possible. We will submit further responses to the consultation on national planning policy.

Yours sincerely,

The Climate Change Working Group

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Ruth Bradshaw, Policy and Research Manager, Campaign for National Parks

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