



Rt Hon. Michael Gove MP
Secretary of State for Levelling Up, Housing and Communities
2 Marsham Street
London
SW1P 4DF

Wednesday 8th March 2023

Dear Secretary of State,

UK100 is a network of local leaders who have pledged to lead a rapid transition to Net Zero with Clean Air in their communities ahead of the government's legal target.

We were pleased to welcome you, together with 30 Mayors and City Leaders, to two Clean Air Summits back in 2019 and are now writing to you following our response, as part of the Better Planning Coalition, to the consultation for the National Planning Policy Framework.

In conjunction with our members from local authorities throughout the United Kingdom, we have a number of recommendations for the framework. In order to address the climate and ecological emergency, seize the economic opportunities that the transition to Net Zero presents and build communities and infrastructure resilient to the worst impacts of climate change, we need to take concrete steps towards meeting the UK's environmental commitments within the planning system.

Firstly, the NPPF must be formally bound to the Climate Change Act, making Net Zero targets a foundation of local plans. UK100 believes that this single action would make a dramatic contribution to the UK meeting its Net Zero targets. Were this change to be introduced, it would need to be associated with a reporting mechanism that would introduce a requirement to 'carbon audit' Local Plans.

Secondly, we need to provide a framework for meeting these commitments, including the development of design codes, Local Environment Improvement Plans, and other mechanisms to check that Net Zero targets are being met with appropriate speed and action. Local planning authorities should also have the power to prioritise the Climate Change Act in planning policy, and the competition between climate mitigation and adaptation criteria and other 'planning contributions' should be removed.



We also recommend the implementation of a national framework for Local Area Energy Planning to give more power and a greater role to local and regional authorities to develop a balanced energy system. This system should combine large-scale power generation with local decentralised energy systems. The NPPF must ensure that every area is covered by a Net Zero Local Area Energy Plan, and guidance should be provided to local authorities which is relevant to different types of areas.

In addition, local authorities should be given planning powers or a regulation code to insist on certain types of technologies (and ban others) in new and existing buildings in Net Zero heat zones, following the measures proposed in the Energy Bill. Furthermore, local authorities should be given powers to require buildings to connect to district heating schemes in identified district heating zones and to require existing developments to connect, in line with the measures proposed in the Energy Bill.

Lastly, UK100 continues to have serious concerns around the proposed National Development Management Policies (NDMPs) and the implication for our members delivering ambitious climate-focussed local plans. The NDMPs must not weaken, override or remove powers provided to local authorities.

Implementing these recommendations will be a significant step towards addressing climate change and meeting our environmental commitments.

We would be grateful if in addition to considering UK100's response to the NPPF consultation, if you would agree to meet with a cohort of our member local authorities to discuss the role of planning and local government in achieving the government's Net Zero targets. Please let us know when you might have availability to meet.

Yours sincerely,

Jason Torrance,
Interim Chief Executive
UK100