



Call for Evidence: [National Planning Policy Framework](#)

UK100 Submission

Contact:

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About:

UK100 is a membership network of 115 local authorities across the UK. Our membership is politically diverse, united by their ambition to deliver strong climate policy. Our submission to the NPPF is based on quantitative and qualitative research with councillors and officers from across the membership.

Executive Summary:

UK100's membership supports the government's policy objectives to deliver sustainable economic growth and build more homes, recognising planning's role in unlocking that growth while addressing housing affordability. While our members' views may differ on specific housing targets and other aspects of the NPPF, there is broad agreement on the critical need to prioritise Net Zero and nature in planning.

The imperative is clear: if Net Zero isn't in planning, we're not planning for Net Zero. The built environment accounts for 20% of the UK's emissions and transport 28%¹. With proper design, the planning system can significantly reduce emissions in both sectors through operational zero carbon buildings and development that promotes active travel and reduces car dependency by increasing transport options.

Our recent qualitative research with members overwhelmingly calls for the NPPF to prioritise climate action as a strategic objective². This would align with the government's mission to kickstart economic growth by stimulating green industries while accelerating progress towards the mission to make Great Britain a Clean Energy Superpower by 2030. Indeed, the UK Net Zero economy grew by 9% in 2023, contributing £74 billion to the economy while the wider economy stagnated³.

The urgency cannot be overstated. On the current trajectory, the UK will exceed its 2050

¹ [2022 UK Greenhouse Gas Emissions, Final Figures](#)

² [Local Net Zero 2.0: The Moment to Deliver | UK100](#)

³ [The UK's net zero economy](#)



carbon budget for building by 2036⁴. This would necessitate drastic emissions reductions in other sectors for the UK to meet its legally binding Net Zero target by 2050, as mandated by the Climate Change Act 2008 (as amended in 2019).

Therefore, we strongly urge that the NPPF must identify climate change as the primary priority for the planning system. The planning system should explicitly account for the legal requirements under the Climate Change Act and support the development of local plans that facilitate local-led Net Zero delivery.

Local authorities are crucial in this transition. Research shows that empowering local authorities to take tailored, place-based climate action could save £140 billion compared to top-down national approaches⁵.

By prioritising Net Zero in planning policy and working in partnership with local authorities, the government can accelerate progress towards its climate goals, stimulate economic growth, and deliver more — and warmer — homes for all communities. The NPPF should support high quality national standards and not impede councils who wish to implement strong standards.

We agree with our sector partners the TCPA, Rights Community Action, Friends of the Earth and the UK Green Building Council who state this could be done through:

1. A definition of the purpose of planning in the NPPF that reflects the crucial role of planning in securing our future in a changing climate;
2. The carbon impact of planning proposals must be accounted and inform planning decisions and plan making
3. The NPPF must be reviewed to give increased direction and urgency to the opportunities for planning and development to support resilience and adaptation

The issue with the NPPF in its current form and the suggested amendments is that climate mitigation is treated as one consideration amongst many, rather than being the first objective of the framework. This approach diminishes the importance of climate change, reducing it to just one of numerous factors in planning decisions. The downstream effect is that local authorities who have created Net Zero compliant plans are often rejected by the Planning Inspectorate, when inspectors fail to give sufficient weight to Net Zero goals. The result is that the planning decisions sometimes do not align with the government's legal requirement to reach Net Zero emissions by 2050. This leaves the framework potentially vulnerable to judicial review. It also creates uncertainty for developers and the construction supply chain.

This stance is not only environmentally short-sighted but also legally incoherent, potentially leaving the framework vulnerable to challenges via judicial review. By failing to prioritise

⁴ [Modelling the embodied carbon cost of UK domestic building construction: Today to 2050 - ScienceDirect](#)

⁵ [Accelerating Net Zero Delivery](#)



climate mitigation, the NPPF undermines efforts to address climate change and creates a disconnect between local environmental ambitions and national planning policy.

We disagree with the suggestion that Net Zero could be considered simply by the building regulations; whilst we welcome introducing the Future Homes Standard, this is currently stalled following the previous government's consultation. Our response can be found here: [UK100 response to The Future Homes and Buildings Standards consultation](#).

It also fails to understand that planning is about place making, not just house making. A net zero led NPPF would support local plans that prioritise active travel, reducing car use, and density, which would be missed if dealt with via the building regulations alone.

The government has set a target for building 1.5 million homes, but we can't have a situation where they are built to current standards, without Net Zero compliant heating systems, insulation and renewable energy generation and storage. If they are, they will just add to the existing retrofit challenge, and be more expensive for those that live in them. We will also miss a crucial opportunity to send a key market signal to UK industry to innovate and invest in the technological solutions to a more just transition.

We also need to ensure that the government has a cross departmental approach to spatial planning, nature, energy planning, transport and growth plans; supporting regional and local authorities to do the same. We can't go on seeing competing and non-aligned approaches that lead to conflict and policy confusion. The Government should ensure there is a thread connecting the National Planning Policy Framework with the land use framework and the Local Area Energy Plans.

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

Yes, our members agree on the decision to move large onshore wind projects to the thresholds for nationally significant infrastructure projects (NSIPs). However, we recommend that the government review the use of the Megawatt threshold as the key metric for deciding which projects must use the NSIP process. As technology improves, projects can generate more electricity from less space. The local community doesn't notice how much electricity is generated, but rather how much land is used for the project. Using MW as the metric could create perverse incentives to push through inefficient technology over a large land mass rather than investing in more efficient technology that could use a smaller allocation of land. It would be more appropriate to consider the number and size of the technologies rather than the generating capacity.

The technical expertise and planning resources required to assess large onshore projects can be a source of strain on how members. While our members support the changes, it should be noted that in the interim our members have lost expertise and experience in assessing and consulting on wind. The government must support local authorities to increase their skills in



the area, and we welcome the jobs and skills plan as part of the wider agenda. The government should support local authorities by providing guidance and training to councils who are dealing with a large number of new applications.

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

Yes, we wholeheartedly support the proposed changes to the NPPF that give greater weight to renewable and low-carbon energy. We believe this policy shift is crucial to facilitating the transition to sustainable energy sources.

However, we are concerned about the potential for fierce, hyper-localised political backlash against these projects. There needs to be a real commitment to consultation and engagement and communities hosting the necessary infrastructure for national economic growth should be fairly compensated for their contribution.

To address this, we propose that councils hosting the renewable infrastructure should be compensated with 100% of the business rates generated by those projects. This would help local communities see the tangible benefits of hosting critical energy infrastructure and ensure they are appropriately recompensed for any construction impacts and disruption. This would incentivise a 'race to the top', with members and their communities to approve projects. This would drive economic growth and improve the race to becoming a clean energy superpower.

The lack of local pricing for electricity means there is little direct financial incentive for communities to support the siting of renewable projects. Our members believe those communities that facilitate essential national infrastructure should rightfully share in the benefits through direct financial compensation. This would allow our members to reinvest in their communities and reduce local opposition.

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, we believe there should be additional protections for habitats with peat soils, as well as compensatory mechanisms put in place. Our research has shown that peat soils store over four times as much carbon as any other habitat. This highlights the critical importance of conserving, restoring, and rewetting peatlands in the fight against climate change.



It is important not to underestimate the role of other carbon-sequestering habitats, such as forests, woodlands, hedgerows, and soils. However, the outsized carbon storage capacity of peatlands makes their protection and restoration a particularly high-impact intervention.

Beyond their carbon sequestration benefits, peatlands are also important habitats in their own right. As such, actions to restore peatland ecosystems can provide a "win-win" scenario, simultaneously addressing both climate change and nature recovery goals.

Given the unique value of peatlands, we believe there should be robust legal and policy protections in place to prevent their destruction or degradation for renewable energy development or other purposes. Where impacts are unavoidable, strong compensatory mechanisms should be required to ensure no net loss of peatland area and function.

Reference: [Powers in Place: The handbook of local authority Net Zero powers](#)

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

UK100 agrees that the planning system plays a crucial role in accelerating climate change mitigation and adaptation. However, we believe the current system in England is not adequately equipped to address the scale and urgency of this challenge.

Critical reforms are needed, which we recommend prioritising as follows:

1. The purpose of planning, as defined in the NPPF, must be reframed to explicitly prioritise action on climate change, reflecting the central role of planning in securing our future in a changing climate.
2. The carbon impact of planning proposals must be rigorously accounted for and consistently factored into planning decisions and plan-making processes.
3. The NPPF requires a comprehensive review to provide stronger, more urgent direction on leveraging planning and development to support climate resilience and adaptation.

Local authority leaders have expressed frustration over the lack of consistency in planning decisions, where their own applications or decisions have failed while comparable neighbouring projects were approved or overturned on appeal. This highlights the need for more transparent and coherent decision-making.

Educating and aligning the Planning Inspectorate is seen as crucial. Members recommend training focused on interpreting Net Zero policies, applying them consistently, and understanding the robust evidence base behind them.

In summary, UK100 calls for:



- The NPPF should prioritise action on climate change
- Empowering local authorities to prioritise climate objectives over developer viability within the NPPF
- Providing comprehensive training and guidance for the Planning Inspectorate on Net Zero policies
- Ensuring developers make Net Zero a core commitment in new development
- Supporting local plans that enable delivery of Net Zero goals
- Local area energy planning should be prioritised by national guidance and funding.

This is particularly important given the government's ambitious housing targets. Without national standards mandating zero carbon new builds, significant public and private resources will be wasted retrofitting homes in the future - an unnecessary and self-defeating outcome.