



The Royal Town Planning Institute  
41 Botolph Lane  
London  
EC3R 8DL  
T +44 (0)370 774 9494  
contact@rtpi.org.uk  
www.rtpi.org.uk

Patron: The former HRH Prince of Wales

Rachel Maclean MP  
Minister of State for Housing  
Department for Levelling Up, Housing and Communities  
2 Marsham Street  
London  
SW1P 4DF

13<sup>th</sup> March 2023

Dear Minister,

I am writing to follow up on our recent discussion and the Royal Town Planning Institute's (RTPI) [response](#) to the 'Levelling Up and Regeneration Bill: reforms to national planning policy' consultation.

In our meeting I was pleased to hear Government's continued commitment to supporting local planning authorities who are facing capacity and capability challenges and helping communities to benefit from well-planned infrastructure, including by coordinating provision beyond administrative boundaries. As I explained, RTPI members believe that a strong plan-led system backed by evidence is vital to achieving these aims and to restoring public confidence in planning services.

The delivery of more local plans across the country would empower communities, protecting them from speculative development and providing the foundations of consent. However, my concern that England's planning system is struggling to deliver and adapt during the process of reform has increased in recent weeks. Planners across the public and private sector have made clear that open and early engagement with the profession and clear direction about the changing expectations of local planning authorities will help to significantly reduce the delays we are seeing to plans and projects.

In that spirit of openness, today I would like to share their feedback on "areas where changes to national planning policy are likely to be needed to reflect the Bill and other aspects of government policy" because these were shared in Chapter 12 of recent changes to the NPPF but have not yet been consulted on.

Like other proposals made in the consultation these "wider changes to national planning policy in the future" would have a profound impact on plans and projects for housing, infrastructure and services that communities and businesses across England rely on.

In the attached briefing I have outlined how policy on these fundamentally important topics should be improved before future consultation with the public, experts, and practitioners. These include further proposals for how climate change, green belts, environmental protection, housing, transport, economic growth and plan-making will be dealt with in national policy.

I am also writing to inform you of research the RTPI has commissioned from the University of Liverpool and ARUP to explore how National Development Management Policies, or equivalent policies, work in other jurisdictions. Initial findings from the research have been shared on our website (<https://www.rtpi.org.uk/blog/2023/february/not-the-usual-development-management-policies/>) and a full report will be published shortly.

We hope these resources will prove useful to advisors and officials in your department and to you as you take forward the Government's planning reform agenda. In the meantime, my colleagues and I would be happy to discuss the issues they cover in greater detail at your earliest convenience.

Yours sincerely,



**Victoria Hills MRTPI FICE FRSA**  
**Chief Executive**  
**Royal Town Planning Institute**

Cc: Joanna Averley, Chief Planner, DLUHC

# RTPI response to Chapter 12 of the ‘Levelling-up and Regeneration Bill: reforms to national planning policy’ consultation members’

March 2023

The RTPI has conducted 16 roundtables across all England regions and with our specialist networks. Contributors had diverse views and experiences, which have informed our final response to the consultation which have been published on our website [here](#). In addition, their suggestions below were agreed by the RTPI’s England Policy Committee.

## Climate change

**Chapter 12 of the consultation says that the government will be adding to the NPPF:**

**“...any further changes needed to reflect our commitment to making sure that national policy goes as far as possible in addressing climate change”.**

We have long argued that the NPPF does not go anything like far enough on climate action. Despite a series of key events since 2012, including the government’s 2019 legal commitment to net zero, the war in Ukraine, the pandemic and COP26 and COP27, the NPPF’s contents on climate change have remained largely unchanged since that document’s inception.

**Government needs to demonstrate clearly that it is serious about using the planning system to secure ‘radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience’**, as stated in paragraph 148 of the NPPF. Currently this is hard to believe: There is an emphasis on housing delivery above almost all else, and this has had significant knock-on effects for how the system operates (short-term considerations about viability, for example, take precedence over costs to occupiers over a building’s lifetime or to the public purse). There is no implementation architecture on climate change to match that on housing delivery, no testing by the Planning Inspectorate of the soundness of plans on climate change, and few supportive appeal decisions. This needs to change.

**Smart energy and climate change should have equal status to the provision of housing, transport and economic growth in national policy.** It should enable local planning authorities to take appropriate, bold, action, including by setting targets which go beyond national standards. Policy should also set clear metrics for carbon accounting, monitoring and reporting by Local Plans.

To do this we need an overarching framework for securing economic growth, delivering housing numbers and ‘building beautiful’. **Action on carbon reduction should be the first amongst equals in the planning process** and within this trio. National policy should set out a carbon reductions delivery test to ensure that all local authorities are accountable for any failure to achieve carbon reductions in new development in the same way that they are accountable for a failure to deliver housing targets. In short, it should be axiomatic that ‘only development which is fit to take its place in a net-zero emissions future, and in a changing climate’ should be permitted.

Specifically **in terms of renewable energy, we consider that there should be a bespoke chapter on the subject.** The availability of proper grid connections should be a material consideration. The NPPF should give clarity on the treatment of energy storage developments, which are a key component of a national renewable energy strategy.

**Strong consideration should be given to the role of exceptional circumstances in determining renewable energy applications in green belts.** Wind and solar developments are principally ‘open’ activities: There are some buildings associated with them, and there should be efforts made to reduce them, but we would question whether those buildings should be considered in the same light as houses. Indeed, unlike new housing, some renewable energy development is reversible. Removing the special green belt treatment of renewable energy would still enable issues such as landscape impact to be considered through other parts of the NPPF.

Finally, given the position taken on wind power in the emerging NPPF, it would be valuable to review possible means of regularising community benefits from solar energy. At present social benefits are not regularised, and this creates confusion. The approach taken in Scotland is recommended.

## Green Belts

The Government proposes to make:

**“Amendments to reflect the commitment in the Levelling Up White Paper to bringing forward measures to ‘green’ the Green Belt [sic], to improve its environmental and recreational value”.**

The 2022 Levelling Up white paper said:

**“Ensuring natural beauty is accessible to all will be central to our planning system, with improved Green Belts around towns and cities, supported by Local Nature Recovery Strategies reflected in plan making, and woodland creation supported across the UK”**

Implementing these proposals does not appear to be a matter of direct concern to planning, but rather a matter for environmental funding (using the Local Nature Recovery Strategies (LNRs) to funnel both Biodiversity Net Gain and Environmental Land Management payments to the right places). It is not clear what amendments could therefore be made to the NPPF to achieve ‘greening’ of Green Belts.

We continue to strongly maintain that any review of Green Belts’ boundaries can only take place strategically, across a housing market areas. Local reviews of any significance are unhelpful. In addition, a purposeful commitment from government to regular reviews of Green Belts would ensure that they remain true to their purpose and are responsive to local needs.

Finally, it is essential that those preparing LNRs comprehend the role of Green Belts and that LNRs could be very useful tools to assist the greening of them.

## Environment

The government says it is:

**“...considering how to align the NPPF with the Environment Act and how to make government’s priorities for the environment clear and to ensure these are given sufficient weight.”**

It proposes changes to:

- **“Set out how Local Nature Recovery Strategies, introduced by the Environment Act, should be given weight in the plan-making process;**

- reflect updated guidance on addressing nutrient pollution, including expectations on strategic mitigation in sensitive catchment areas;
- reflect a review of policy on ancient woodland, as agreed in the passage of the Environment Act 2021;
- reflect the introduction of mandatory Biodiversity Net Gain from 2023; and
- incorporate nature into development through better planning for green infrastructure and nature-friendly buildings.”

The government needs to indicate not only how Local Nature Recovery Strategies (LNRSs) will be taken account of in the planning process, but also how local plans will inform LNRS. This aspect of the introduction of the LNRS seems to have been overlooked.

**Our understanding of ‘strategic mitigation’ for nutrient pollution is that is not, so far, a practical means of promptly dealing with the crisis in nutrient neutrality.** This is due to the long time scale needed to establish alternative wetland.

In addition, we are concerned that the Government’s targets for agricultural pollution, far from responding to public concerns in the recent consultation, appear less demanding even than was consulted on.

As an urgent, practical, solution consistent advice or guidance should be applied across the country on this issue. This should include the fact that a pragmatic understanding of the *actual increase in numbers of people in a catchment* is crucial for addressing water pollution. This would be more effective than the current approach, which relies on assumptions that:

- 1) Every home has a set (and high) number of occupants; and
- 2) every home represents a net increase in catchment population.

We are relieved to see both that the government has listened to the RTPI and others, and that it has announced funding for the operation of BNG, although this is mainly limited to authorities which are not local planning authorities (for example, counties). This, therefore, does not account for the costs to development management departments of running this scheme.

The government has also listened to us regarding the need to postpone application of Biodiversity Net Gain to small sites.

## Transport

The Government plans to introduce changes to:

**“...reflect the government’s commitment to encourage active travel through the ‘Gear Change’ programme, the forthcoming update to Local Transport Plan’s Guidance, any update to Manual for Streets and wider work to reduce carbon consumption from transport planning choices as set out in the Transport Decarbonisation Plan.**

It also plans to:

**“Review policy on the freight sector and supply chains infrastructure, such as lorry parking, warehouse space and rail freight hubs.”**

We would strongly support a review of policy on freight and supply chains.

**Transport policy objectives should go beyond ‘decarbonization’.** Changing transport to net zero would still not overcome issues of differential access to private vehicles, the very high cost to poorer households of car dependency, the cost of congestion and the damage to the quality of life of high car use (noise, separation, air pollution, etc).

## Housing

**The NPPF should be more explicit about the positive role the private sector can play in delivering 'build to rent' developments.** The planning system's current ostensibly neutral stance on tenure hamstrings planners' efforts to meet local needs.

More effectively meeting older people's housing needs is something mentioned in the main consultation, but still a concern, given its knock-on effects for the NHS and housing stock. Options for encouraging downsizing where it is appropriate, and providing greater access to key services in process, are key issues. This would also free up the opportunity for family housing.

## Economic Growth

The government proposes to:

**"...consult on a more positive framework for supporting economic development, including reviewing the approach to supporting employment land, and the consideration of supply chain and connectivity issues"**

The RTPI considers that planning for land for warehousing and logistics urgently requires national policy guidance. We are planning to conduct research on this issue and would be happy to work with the department on it.

## Local Plans

The government says that it will be:

**"Replacing the statutory duty to cooperate (which would be abolished by the Bill) with a new 'Alignment Policy' to secure appropriate engagement between authorities where strategic planning considerations cut across boundaries".**

We consider that it is equally important that local plans within a wider housing market area align their plan making timetables with each other. Without this, a practice has grown up in the last decade whereby the first LPA in a housing market area to submit a local plan has an unfair 'advantage' in terms of the extent to which it needs to demonstrate that it can meet its housing need. This brings about a situation in which there is no clarity where, across a housing market area, unmet housing targets will actually be accommodated. This becomes even more necessary if LPAs do not need to change green belt boundaries or permit changes to the character of areas through 'densification' in order to meet targets.

## Neighbourhood Plans

**Neighbourhood priority statements need to be referred to in the new NPPF.** The wider adoption of these statements could be an effective way of building community engagement in planning, but this must occur in disadvantaged as well as advantaged communities (the latter generally being much more likely to have the resources, knowledge, and time to produce neighbourhood plan).