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planning for the climate challenge?

understanding the performance of english local plans



executive summary

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The spatial planning system provides for the democratic regulation of the built environment in the public interest, and has the potential to make a major contribution to both reducing carbon dioxide emissions and preparing for the growing impacts of climate change. This report reveals that the planning system is failing to fulfil this potential.

Despite the increasing intensity and frequency of climate-related impacts, local plans are not delivering on the basic standards set out in national law and policy for either mitigation or adaptation. To deliver the fundamental change required, climate change must be placed front and centre of the policy priorities of the spatial planning system. Only a radical refocusing of the system will meet the challenges of climate change, now and in the future.

The study underpinning this report explored how local plans published since the National Planning Policy Framework was produced in 2012 are addressing climate change. Drawing on a sample of 64 local planning authorities in total, and based on an analysis of local planning documents, a survey of local authority planners and four more-detailed, area-based case study examinations, the study established the extent to which climate change mitigation and adaptation are reflected as priorities in local plan policy in England.

The study found that local plans in England are not dealing with carbon dioxide emissions reduction effectively, nor are they consistently delivering the adaptation actions necessary to secure the long-term social and economic resilience of local communities. There was a wide variety of practice: there were some examples of positive responses, but, taken as whole, it is clear that since 2012 climate change has been de-prioritised as a policy objective in the spatial planning system. The large-scale failure to implement the clear requirements of national planning policy is a striking finding, as is the reduced capacity of the local authority planning service and the reduced capacity of Environment Agency to support the long-term plan-making process.

There are complex reasons for this situation – ranging from perceived contradictions in national policy to political signals from Ministers in the Department for Communities and Local Government and HM Treasury about the overwhelming priority to be given to the allocation of housing land. In addition, in many cases local plans do not meet national policy requirements on climate change but are still judged sound by the Planning Inspectorate. Underlying all of this is a crisis in resources in the local planning service which inhibits effective local policy-making.

The failure to use the planning system's capability to help mitigate and adapt to climate change is inefficient, and is likely to lead to long-term avoidable costs to the economy. Conversely, there is a real opportunity to harness the system as a key local part of the national response to climate change. Fulfilling this potential requires, above all else, a signal from national government that climate change is a primary political, legal and policy priority for the local plan process.

This report recommends ten actions for national and local government that could significantly and cost effectively improve the performance of local plans in relation to climate change.



key findings

Finding 1

Climate change has been de-prioritised as a significant local planning policy issue.

Finding 2

Policy and legislation on climate change are poorly understood.

Finding 3

National policy as set out in the National Planning Policy Framework and in National Planning Policy Guidance does provide for a clear approach to climate change. However, it also contains policy on viability which prevents some key actions from being delivered. In addition, changes made by subsequent amendments to energy, zero-carbon and sustainable urban drainage policies have made action on many climate change responses more difficult.

Finding 4

The evidence-gathering, methodologies and policy-making used to address flood risk were far more sophisticated than the equivalent for climate mitigation or any other aspect of adaptation. Local plans deal with carbon dioxide emissions reduction vaguely, often without an explicit methodology for measuring reductions.

Finding 5

LPAs are failing to plan for future climate change and therefore are not planning for the adaptation measures necessary to secure long-term social and economic resilience.

Finding 6

The governance of climate change issues at the local level is complex and sometimes contradictory. LPAs are not supported by a national agency to secure national carbon dioxide emissions reduction objectives, while the specific challenge of flood risk is reliant upon the support of the Environment Agency.

Finding 7

Planning requirements do not apply to a wide range of land uses, which affects local responses to climate change.

Finding 8

Specific approaches to dealing with climate change are still novel to many local authority planners, and access to affordable training is a major issue.

Finding 9

Climate-change-related policy outlined in local plans is generally short term and not sufficiently future-facing to deal with climate risk.

Finding 10

The duty to co-operate among LPAs is overwhelmingly focused upon housing growth, with little to no emphasis placed on cross-boundary climate change issues. However, strategic co-operation on issues such as evidence-gathering is a major opportunity area for climate change work.

recommendations

Recommendation 1

Re-prioritise climate change in the local plan system

The dominant pre-condition for improved outcomes on climate change mitigation and adaptation in the local plan process is a clear political signal from central government that such action is a priority outcome for the local plan. Ministers have the opportunity to clarify the place of climate change through an urgent parliamentary statement or through a chief planning officer letter to local authorities.

Recommendation 2

Provide clarity on the legal requirements on climate change

The Department for Communities and Local Government should issue a clear statement through a chief planning officer letter to make clear the nature of the requirements of Section 19 of the 2004 Planning and Compulsory Purchase Act, and in particular that all local plans must contain policy on mitigation and adaptation. Such policy must be in conformity with the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) requirements on climate change.

Recommendation 3

Provide clarity in national policy

Four key changes to policy set out in the NPPF are required:

- The imperative, set out in paragraph 6, that NPPF policy should be 'taken as a whole' needs to be reinforced.
- Paragraph 99 should set out a fuller range of adaptation impacts and should, along with further detail in the NPPG,

reinforce the role of green infrastructure and make explicit the link between social exclusion and the impact on human health of particular aspects of severe weather resulting from climate change, such as high temperatures.

- The current definition of viability for plan-making, set out in paragraph 173, needs urgent reform. The main aspect of this reform should be to include as part of the assessment of viability not only the profitability of a development project to the developer and landowner at that time, but the wider and long-term benefits of, for example, climate resilience measures for wider society and ultimately the public purse.
- The review of the implementation of sustainable urban drainage systems (SuDS), to which the Government is committed, should focus on providing a clear indication of the current level of SuDS delivery and the split between 'normal' SuDS and 'green' SuDS.

Recommendation 4

Define the scope of climate evidence in local plans

For mitigation, scope guidelines should make a clear link between the work of the Committee on Climate Change, carbon budgets and the required action to be taken by LPAs through planning, to provide an articulation of what the NPPF currently requires in terms of 'radical reductions in greenhouse gas emissions'.

For adaptation, it is vital to set a national standard for the scope of evidence. This should include issues beyond flood risk, including temperature and a wider range of public health risks.

Recommendation 5

Deal clearly with risk

Proportionate 'rules of thumb', clearly defined as such, would be useful inputs in planning the built environment. The example of the Environment Agency flood risk allowances for climate change provides a useful starting point. Since all the impacts of climate change play out as complex probabilities (related always to aspects of local conditions), and given the scarcity of skills and resources on the ground, it would be useful to:

- Ensure a greater national determination of the probability of risk factors based on current emission trends.
- Support a simple plan-making methodology that combines nationally agreed approaches with an assessment of locally agreed circumstances.

Recommendation 6

Reform the governance of the delivery of action on climate change

At national level the Government should ensure that the Committee on Climate Change has a clear remit to support the work of local government on climate mitigation.

The governance of the delivery of local action on climate change needs wholesale review to determine how actions can be delivered more effectively.

Recommendation 7

Review the scope of the English spatial planning system

The Government should consider how an integrated strategic planning scheme might be developed for all land uses in those areas of greatest risk from climate change. The Government should reconsider the recommendations set out in the Royal Commission on Environmental Pollution's 23rd report, *Environmental Planning* (2002), for a wider remit for spatial planning – and to this end should consider commissioning an update of that report in the light of the current climate science.

Recommendation 8

Provide adequate resources to plan for climate change

Since action on climate change is a vital public interest outcome, local government should ensure that minimum service standards are maintained. National government should recognise the specific needs of those authorities experiencing or likely to experience the impacts of climate change. National government should, along with relevant departments, focus resources on a programme of support services (including training and model policy development) to aid local plan development.

Recommendation 9

Encourage spatial planning over the long term

There should be much greater emphasis on the need to plan for 50- to 100-year time horizons, to avoid lock-in to problems from maladapted developments built now. This implies greater sophistication in planning, not just for current risk factors but in a proportionate anticipation of future risks. The Environment Agency flood risk allowances for climate change provide the basis for this approach in some aspects of adaptation, but much clearer guidance should be provided to encourage actions now which will lay the foundation for future resilience.

Recommendation 10

Promote new forms of strategic co-operation

Devolution deals and the establishment of combined authorities provide opportunities to develop strategic responses to climate change. Realising this potential would require a major reorientation of such deals to prioritise action on climate change. In turn, this would require agreement from the Department for Communities and Local Government, the Department for Business, Energy and Industrial Strategy, the Department for Environment, Food and Rural Affairs, and HM Treasury.

Outside formal devolution deals, both the Environment Agency and the Department for Communities and Local Government should encourage the formation of informal groupings of local authorities that face similar climate challenges.

The local planning system must deliver the homes and communities that our nation needs, but it must do so within the context of one of the greatest challenges ever to face our society: climate change. It remains unclear whether the United Nations Framework Convention on Climate Change (UNFCCC) Paris Agreement resulting from the 21st session of the Conference of the Parties (COP 21) held in December 2015 can deliver long-term climate stabilisation, but this report highlights that England's planning system is not effectively engaging with current risks and is simply disengaged from its core task of addressing long-term future change. The system remains **critically unprepared** to deliver both carbon dioxide emissions reduction and the kind of resilience measures needed to deal with the scale of the climate change impacts anticipated in the UK, as identified by the scientific evidence.





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