

# Making climate change a non-negotiable aspect of national planning policy

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A Green Paper

**Aether** 

# Executive Summary

The National Planning Policy Framework (NPPF) lays the burden of balancing the complexities of planning for growth at the door of local authority plan making. The emphasis is on short-term priorities and only 'consideration' of long-term societal needs.

This green paper has been developed by Aether to highlight the need for reform in national planning policy and the institutions that support it to address the climate emergency effectively.

**Seven policy interventions** have been created that aim to support the integration of climate policies into local plan-making.



**Empowering Local Authorities:** Local authorities should be equipped with the necessary resources and regulatory support to effectively challenge developers and prioritise net zero targets and climate risk in local plans.



**Holistic Decision Making:** Climate change considerations should be integrated into all aspects of local plan-making, including skills, infrastructure capacity and innovation.



**Clear and Accessible Policy Language:** The language used in the NPPF needs to be clear and measurable, facilitating effective engagement and interpretation by all stakeholders.



**Defined Criteria for Climate Risk:** National Government should provide clear risk tolerances and resilience standards to guide local planners in integrating appropriate levels of climate adaptation into their local plans.



**Alignment with National Carbon Emission Budgets:** Local authorities need to assess the emissions impact of proposed growth against national carbon budgets, ensuring alignment with net zero targets.



**Sustainable Housing Targets:** The process of allocating housing should be centred around sustainability, not just numbers, with a focus on identifying the most sustainable locations for development.



**Adaptive Local Plans:** The NPPF should support a system of continual improvement in local plans, enabling them to evolve in response to changing conditions, innovation, and societal needs.

# How to make climate change a non-negotiable in planning for growth

The National Planning Policy Framework (NPPF) lays the burden of balancing the complexities of planning for growth at the door of local authority plan making.

The emphasis is on short-term priorities and only 'consideration' of long-term society needs. For example the NPPF (and the current consultation document) places housing numbers as sacrosanct but action on climate change is negotiable.

In this green paper, we present our experience of how the institutionalised thinking in planning can be changed to make climate change non-negotiable. It is based on our experience of working with governments globally on their Paris Agreement commitments, our engagement with investors looking to enable changes and our developer clients who want to see a better future for our country.



The disconnects between planning for growth and responding to the climate emergency are well known and are deeply rooted in institutional ways of working, both in and between government and the private sector.

Climate change is discussed separately from the current narrative of the economy and described with the need to 'mitigate' and 'adapt' rather than in the context of successful economic growth.

Local authorities have an important role to play in delivering the Government's statutory target for net zero emissions by 2050. It is crucial that the NPPF plans for a net zero and resilient future by requiring new, bold, integrated climate policies for both mitigation and adaptation.

Evidence created in local plan making tends to prioritise past experience which is stymied by previous institutional ways of planning growth. It is why growth is still planned around the car ownership.

The current approach to plan making is essentially re-planning the mistakes of that past, rather than planning for a different future.

Without radical change in the NPPF, the institutional ways of planning growth, stemming back to the industrial revolution, will continue.

National planning policies need to reflect the need to break the status quo.

This paper is Aether's response to the call for how the NPPF can deliver these stronger planning policies on climate change. It sets our seven opportunities that would enable change in turning action on climate change into a non-negotiable aspect of local plan making.

# 1. EMPOWERING LOCAL AUTHORITIES

Local authorities lack the resources and regulatory teeth to challenge developers effectively. There is no clear duty for local authorities to consider net zero targets or climate risk in local plans.

The current NPPF wording only suggests local authorities 'should consider' climate change mitigation and adaptation. This is not strong enough to ensure all local authorities are responding to the opportunities net zero brings to their economy and are planning to deliver the changes needed.



## A mandate for change

The NPPF needs to provide clearer national direction to guide local authorities and direct development. Without this, local authorities struggle to make consistent decisions, leading to varied approaches across different regions. Without this mandate, local authorities are less likely to resource action or establish meaningful policies.

Clearer national direction needs to ensure the additional costs of delivering against the climate emergency are factored into the land value. By layering cost into the development viability model action on mitigating and adapting to climate change becomes a point of negotiation between developers and local authorities.

But tackling climate change is more than just the 'cost' of constructing better quality zero-emission homes. Local plan policy needs to address wider aspects of constructing growth including carbon emissions of supply chains, not just the embodied emissions of the construction materials themselves but also where the materials, and labour are sourced.

Climate change policies that deliver skills, innovation, and careers should be a primary focus of plan-making evidence. Policies should include planning to enable local supply chains of materials and developing a local labour force that is skilled in the construction of zero-carbon homes. This will deliver the multiplicity of benefits of planning for climate change including the social value.

The NPPF needs to change the requirement that local authorities 'should consider' climate mitigation and adaptation to a clear 'must deliver'.

## **Policy One: Empowering local authorities**

**In local plan making, local authorities are required to evidence how clean and inclusive growth will underpin the response to the national net zero commitments and the risks from acute and chronic risks of climate change. Evidence is required to show how the plan delivers green skills, healthy communities, and employment opportunities through the plan period, in addition to protecting communities and natural environment from the extremes of weather we will face.**

## 2. INTEGRATED DECISION MAKING



Climate change considerations are often treated as an afterthought in local plan making and often limited to construction standards in new buildings for mitigation and flood and/or overheating risk for adaptation.

These don't reflect the whole system nature of the response that is needed. Instead, they relegate climate change to single issue responses.

Local planning evidence-base documents (such as strategic housing land allocations, site allocation plans, local transport strategies, etc.) are created by experts often working in siloes, and rarely consider impacts on and from climate change.

For example, this can be seen currently with how "best use of land" is determined with no consideration of the wider impacts on national decarbonisation plans when planning for high electricity-intensive industries such as data centres, advanced manufacturing, and electrification of logistics. Such land uses create conflict with the national strategy to electrify heating and transport in existing communities as they both compete with limited power system resources.

Local plans need to include foresight on how the future digital economies will impact positively and negatively on existing communities and respond to the reasonable worst-case scenarios of climate change. The resource impacts of high energy-intensive land uses will remove resource capacity for both housing growth and the decarbonisation of existing economies. This foresight will also provide the direction of travel to unlock innovation that will support emissions reduction such as autonomous movement. Utility and resource infrastructure plans and strategies need to be integrated into plan making to ensure net zero is delivered.

## **Policy Two: Supporting holistic decision making**

**Plans are required to show how the land use changes proposed respond to the decarbonisation needs of existing communities against the competing needs of the future economy. This includes the benefits of future ways of working that does not demand colocation of housing and large employment land uses in some industries.**

**Infrastructure delivery plans are required in order to account for future energy and resource consumption in light of an economy that has distributed data centres, quantum computer processing, and decarbonisation of movement.**

**Housing and infrastructure delivery plans must be appraised against a range of future climate scenarios to ensure resource availability will be met.**

### 3. LANGUAGE AND ACCESSIBILITY



The language used in the NPPF relating to climate change affects engagement and interpretation. This is both in terms of where climate change is discussed and how it is described.

When describing climate change (and wider sustainability) the language used is often vague without intrinsic meaning. For example, the NPPF calls for strong and vibrant communities. Neither 'strong' nor 'vibrant' are words that come with quantifiable outcomes.

It is not possible to deliver that which you cannot measure. Whilst this might seem like semantics, the impact of ambiguity has a significant effect on sectoral engagement to the challenge at hand. Ambiguity leads to a range of behavioural responses including cognitive dissonance to deal with complexity.

Climate change is discussed separately from the current narrative of the economy and described in the need to 'mitigate' and 'adapt' rather than in the context of successful economic growth.

We see the negative impact of this ambiguity across local authorities and investors in growth, whether it relates to avoiding target based climate change policy in local plan making in fear of being challenged or land developers exploiting the margins of what 'strong' or 'vibrant' does or doesn't mean when defining their positions on sustainable development.

Policies need to be clearly understood to ensure they resonate with the public, local authorities and investors. Clear language and practical solutions that satisfy multiple needs are essential for effective policy implementation. This needs to target a positive behavioural response to policy.

The language used needs to be relatable and engaging to ensure it resonates with the public, local authorities, and the experts who create evidence.



## **Policy Three: Clear and accessible policy language**

**Adjectives such as happiness, connected, and resilient are all words with meaning and indices that can then be applied to local plan making.**

## 4. CRITERIA FOR RISK TOLERANCE

Policy needs to reflect on the evidence of the impact of adverse weather beyond flooding, such as the record-breaking number of wildfires and estimates of heat-related mortality in the UK during the heatwaves of summer 2022, and provide effective adaptation responses. Adaptation strategies often appear as an afterthought in current policies and don't address impacts including 'loss of life' and social disorder that come with extreme weather events.



### Mandating climate resilient growth

Current policy does not present any tolerance for risk other than preventing development in areas at risk of flooding. National Government should provide a role in setting clear risk tolerances and levels of resilience to guide local planners in integrating an appropriate level of climate adaptation in their local plans.

The UK Government Resilience Framework identified the ambition for change on managing climate risk. It identified the role of local plan making to manage climate risks, and for leadership to integrate resilience into local policy and place making in England.

Currently, the NPPF does not recognise and embed the UK Government Resilience Framework within planning policy.

Planning for the acute and chronic risks of weather will be critical to keeping communities safe and resilient. This will require a mandate for local authorities to establish emergency plans for managing climate risk to a specified resilience standard, as well as planning for resilient infrastructure and communities that reduce the likelihood of emergency.

This needs to be delivered and integrated through the UK Government Resilience Framework using the powers and influence of the 38 Local Resilience Forums to physically and strategically plan for resilience within local plans.

## **Policy Four: Defining criteria for climate risk**

**Local authorities to set out plans to prepare for and respond to both acute and chronic risks presented by climate change as defined within the UK Government Resilience Framework.**

**This will include the need to coordinate responses with social infrastructure providers including schools, care homes, food distribution and public transport providers to ensure communities are safe and resilient to the effects of climate change.**

# 5. PROPER ACCOUNTING



Currently, the planning regime does not address the significance of growth against the national carbon emission budgets.

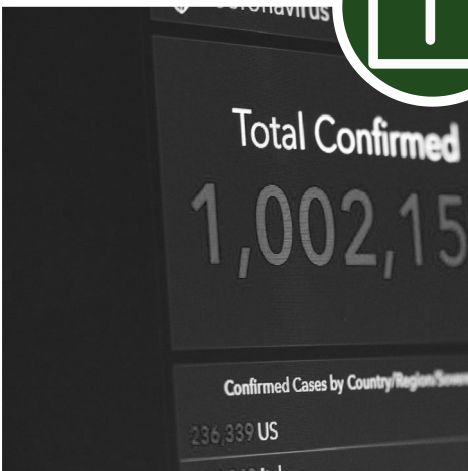
Whilst the National Atmospheric Emissions Inventory provides an assessment of emissions after they occur, the sum of the emissions of all growth defined by local authorities is not calculated in advance.

No one is estimating, budgeting and auditing the emission impact of growth.

Without assessing the potential combined impact of growth against the national budgets, it is not possible to identify whether what is planned meets our net zero targets.



In particular, domestic transport, buildings, and product use are currently the three highest emitting sectors in the UK and hence the NPPF should focus on policies to reduce emissions from these sectors as well as electricity supply.



Local authorities will need to assess the direct emission impacts of proposed local growth set against the national sectoral GHG emission.

## **Policy Five: Alignment to the national carbon emission budgets**

**The relative and absolute GHG emissions created up to 2050 will be presented within the local plan. These emissions will be tested against future UK decarbonisation scenarios. The method for local plan level GHG emission assessments will be provided by Government to ensure alignment with the methodologies defined within the National Atmospheric Emission Inventory for all sectoral emission and those defined within the carbon budgeting methodologies.**

## 6. HOUSING TARGETS & SUSTAINABILITY



The current process of allocating housing is centred around a process of spatially assessing the best locations based on a range of physical and social geographic parameters. As the 'best locations' including viable brownfield land have largely been delivered, the process has now become a race to the bottom for the "least worst" locations.

Rapid changes in housing targets only increases the proportion of locations that are even less sustainable than previous decades of site allocation appraisals. This creates a presumption in favour of "least-worst development".

There are no mechanisms to ensure site promoters do more than present the 'least worst'. At the earliest stage, site promotion should be looking to evidence how they intend to elevate their sites beyond their spatial location.

As the process of site allocation is a race to the bottom of least worst locations, it is critical that those promoting sites work harder to allocate investment against the sustainable development criteria developed by local authorities to inform the site allocation process. This should include the changing demographic needs, not least of which the needs of an ageing population in a changing climate.



The NPPF should also include the cost of wider social and environmental aspects beyond just social housing provision when developing the mechanisms of determining land value on greenbelt delivery.

The NPPF could establish policy to support collaboration between local authorities and site promoters who collectively respond to the longer-term needs of sustainable development. In turn, this will drive competition through site promotion to improve sustainability investments.

## **Policy Six: Sustainable housing targets**

**Significant weight will be given within the sites allocation appraisal to those that can meaningfully demonstrate enhancements through investment into sustainability aspects defined within the local plan Sustainability Appraisal.**

**The objective will be to ensure that developments come forward with sustainability principles considered at the heart of their allocation across social and environmental benefits, embedded with the land valuation, rather than left as a development costs.**

## 7. PERFECTION OR PROGRESS?

Local planning need to be responsive, relevant, and effective in addressing the evolving needs of our communities. This requires a policy of continual improvement.

Rather than a 15 year fix, policies need regular updating and refinement to respond to new evidence without the need for extensive consultation processes. By fostering a dynamic and adaptive planning framework, we can better support sustainable development.



### Adaptive planning to adapt to change

Whilst 'fixing' policies in local plans over 15 years theoretically provides investor certainty, it cannot respond to the pace of change needed in light of rapid onset of climate change impacts, or indeed any other dynamic system needs. The greatest certainty to investors appears to be the ability to challenge the outcomes of fixed plans.

We are already witnessing the planning system's failure to keep up with the current pace of change, whether that's policy change in the face of a crisis or infrastructure capacity under the strain of a changing economy.

The NPPF should look to allow local authorities to adopt a system of adaptive planning through continual improvement. A process of monitoring, evaluation and learning, that allows a local plan to evolve against a world that is changing weekly.

Certainty is developed through transparent identification of the areas of policy a local plan seeks to improve, and allow investors to support the continual improvement rather than challenge it. Consistency is created in the journey not the outcomes of today's politics. Policy can be more responsive, relevant and effective in addressing the evolving needs of tomorrow.



# **Policy Seven: Adaptive local plans**

**By fostering an adaptive planning framework through continual improvement, we can better support sustainable development, enhance community resilience, and ensure that planning regulations keep pace with societal changes and technological advancements.**

# Seven interventions to make climate change a non-negotiable in planning

Aether wrote this green paper in response to the NPPF consultation.

In our unique position of working between Government, Local Government and the private sector we see the opportunities available to create the institutional change needed to address our collective obligations to the planet.

At the very least this starts with the need to integrate climate policies for both mitigation and adaptation into the National Planning Policy Framework (NPPF) to ensure a resilient future.

The private sector, not just housing developers, need to engage in plan making. Local plan making and corporate net zero are intrinsically interlinked.

Modal shift, local employment sites, and education and skills are all things that local plan making should be delivering which underpins existing economic decarbonisation.

Whilst it has not been the role of the NPPF (or indeed the institutions that represent the planning system) now is the time to look at how national planning policy facilitates this type of connected thinking.

Through a connected response, climate change will become the non-negotiable that the planet demands.

This green paper discusses the need for reform in local planning to address the climate emergency effectively. Seven policy interventions have been presented that aim to support the integration of climate policies into local plan-making.

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7. **Adaptive Local Plans:** The NPPF should support a system of continual improvement in local plans, enabling them to evolve in response to changing conditions, innovation, and societal needs.



Aether's 40 strong team of specialist environmental consultants provides development, management, reporting and review of GHG inventories and projections, management systems and sustainability advisory. Aether's team has been working continuously across the climate change agenda globally since the company's inception in 2008.

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