RTPI response to BEIS Net Zero Review: Call for evidence October *2022*

This is the RTPI's response to the BEIS review of the government's approach to delivering its net zero target. The Royal Town Planning Institute (RTPI) supports and welcomes the chance to provide input on such a critical area of policy. The RTPI has consulted our relevant networks and members to provide a holistic and representative response to the consultation. This response is from England only. Our key findings can be found below, both in our overarching comments and then in our response to some of the specific questions in the consultation.

About the RTPI

The RTPI champions the power of planning in creating prosperous places and vibrant communities. As learned society, we use our expertise and research to bring evidence and thought leadership to shape planning policies and thinking. As a professional body, we have over 27,000 members across all sectors, and are responsible for setting formal standards for planning practice and education.

General Comments

Climate change and net zero are the defining challenges of our time and the UK needs to rapidly reduce greenhouse gas emissions across a number of sectors. Such a significant challenge requires a truly holistic approach that considers every possibility and opportunity to deliver a greener future.

Planning can be one of the most influential tools in delivering net zero, helping to shape and change our societies for the better. The RTPI has consistently championed the role of planning within net zero, highlighting the need to take into account climate change across all facets of planning. Planning can be a driving force for not only net zero but for growth as well, helping to unlock opportunities across the country and deliver developments that deliver both net zero and economic growth.

The planning system has a pivotal role in the delivery of the UK Government's net zero commitment. Used effectively, planning can help frame and deliver the place-based pathways to a net zero future that underpin low carbon living. This includes the successful deployment of renewable energy and supporting infrastructure, minimising the carbon emissions of what we build, finding the right sustainable locations and designing places that support low carbon transport options.

Successfully getting to net zero depends on how and where we live, work and recreate and how we connect between these dimensions of daily life. Our report, *Invest and Prosper* *detailed how* promoting active travel through planning could help reduce short car trips and increase physical activity, saving the UK economy £2.6 billion each year. Providing planners with the resources to

shift of just 10% of car trips under 5 miles to cycling would save 430,000 tonnes of CO_2, valued at £29 million.

Energy consumption and energy production are located in, are affected by, or relate to places. And all are impacted by planning. Planning controls what we build and where. Planning is the gatekeeper for delivering the infrastructure that will underpin zero carbon.

Local planning can build consensus and help deliver the necessary building blocks for low carbon living, or alternatively zero carbon infrastructure and life style changes can be driven through nationally. The latter will often be against the will of local communities and risks derailing the net zero target because it fuels community opposition and stalls necessary change. The stagnation of onshore wind in England and how it has been contested in the political arena is a perfect example of this.

Invest and Prosper also outlined how enabling Local Planning Authorities to proactively prioritise decarbonisation can generate important savings to the economy and support the net-zero transition. Analysis estimates that if emissions reductions achieved under the London Plan were extended to all major developments granted planning permission in the, this would lead to annual CO_2 savings of nearly 19 million tonnes valued at £243 million to £1.3 billion

Planning also has the granularity to recognise local distinctiveness, helping to adapt policies and new approaches to the communities that they will impact.

Planning can:

- Ensure that the design of new development minimises requirements for heating, cooling and power, through a combination of place-making principles associated with density, mix of activities, layout and orientation.
- Maximise the cost-effectiveness of heat networks, for existing places and planned development, through directing the density and mix of development and activities on sites.
- Require that the location and density of new development, as well as how movement is managed within development, substitutes more sustainable travel choices rather than private car use as a primary mode of travel.
- Maximise opportunities for local energy networks to reduce reliance on existing national infrastructure and avoid costly (and likely contested) enhancements.

Overarching questions

1. How does net zero enable us to meet our economic growth target of 2.5% a year?

By committing towards net zero, we are opening up opportunities for new forms of growth from new technologies, new ways of thinking and many more aspects of growth. Net zero should never be seen as anti-growth, it is instead an approach to continued development but just through a new way. For example, if we are to plan and develop a smart and low carbon energy network then this will involve significant investment in renewable energy and other aspects such as carbon capture and storage. These investments will in turn create new jobs and added value to the economy alongside a self-sufficient and resilient energy network. Such positive effects

would be the same with investment in low carbon travel methods, enabling the wider roll out of active travel and public transport.

2. What challenges and obstacles have you identified to decarbonisation?

Perhaps the most significant obstacle to decarbonisation is the current National Planning Policy Framework (NPPF). Smart energy and climate change should have equal status with the provision of housing, transport and economic growth in national policy, and enable local planning authorities to take appropriate action, including by setting targets which go beyond national standards. Our report, *Planning for a Better Future* detailed how policy should set clear metrics for carbon accounting, monitoring and reporting by Local Plans.

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" (NPPF paragraph 148). 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.

To do this we need an overarching framework for securing economic recovery post Covid-19, delivering housing numbers and building beautiful. Action on carbon reduction should be the first amongst equals in the planning process. 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 the same way they are accountable for a failure to deliver housing targets. In short, it should be made that 'only development which is fit to take its place in a net-zero emissions future in a changing climate should be permitted.

Another significant obstacle to achieving net zero emissions by 2050 is our current skills and funding gaps. In planning these largely materialise within local planning, which has experienced significant cuts to budgets in the last decade. Local Authority net expenditure on planning has fallen by 43%, from £844m in 2009/10 to £480m in 2020/21. This amounts to just 0.45% of local government budgets allocated to planning services.

Over 570 councils in the United Kingdom have declared climate emergencies and they are now tasked with leading the decarbonisation of their local communities with budgets that are a fraction of what they were over ten years ago. If local planning is to be able to be significant contributors towards net zero then they must be given greater levels of funding to properly resource themselves and ensure that they are doing everything they can do to reduce the emissions of the communities that they serve.

Alongside the issue of funding, there is a real skills deficit within planning for net zero. Planners need to be equipped with the skills, technology and understanding to ensure that they are doing everything they can to decarbonise new and existing developments. As new technologies and methods of decarbonising our environment arise, planners should be at the forefront of these skills to ensure that we can engrain them into our communities at the earliest possible stage.

As outlined in our general comments, whilst the government has made significant commitments in the shape of the Climate Change Act in 2008, there needs to be more direction from national policy and leadership. Climate change and net zero must be inbuilt into every policy and planning must be given a mandate to ensure that decarbonisation is engrained into everything

we do. Without greater direction from national policy, the scale of change required remains open to challenge.

3. **What opportunities are there for new/amended measures to stimulate or facilitate the transition to net zero in a way that is pro-growth and/or pro-business?**

Within planning there are a number of opportunities to stimulate and facilitate the transition to net zero whilst also boosting growth. Current policies such as nutrient neutrality are blocking the development of houses and in turn the creation of jobs by declining applications until they can demonstrate that new housing would not add to the load of pollution coming out of sewage treatment works. Whilst these policies are helping to protect the environment, small building firms will be hit the most from these policies.

We, along with the Broadway Initiative, have been developing the concept of Local Environment Improvement Plans (LEIPs) which would bring all the current plans for water, habitats, farming support, air quality and coastal management into a single and complete plan. This would make the key task of aligning environmental plans and local plans a lot easier, which, for example, could mean that plans such as the Greater Cambridge local plan would have a guaranteed water supply to all sites. A starting point for LEIPs could be the Local Nature Recovery Strategies brought in by the Environment Act 2021.

In a time where droughts, floods and sea levels are on the rise, we cannot afford to let environmental planning be a side show. If we want to deliver net zero in a pro-growth manner then we must ensure that we bring all aspects of environmental planning together.

Alongside the opportunities that changes to environmental planning can hold for both net zero and growth, the inclusion of sustainable growth can help deliver net zero in a pro-growth manner. Our Net Zero Transport highlighted the benefits of the '20-minute neighbourhood' policy which would help to link people to their jobs and other employment opportunities whilst helping to decarbonise surface transport through the reduction of car journeys.

Planning provides a wealth of opportunities to help push towards net zero whilst facilitating growth through unlocking new opportunities for development and regeneration.

4. **What more could government do to support businesses, consumers and other actors to decarbonise?**

There are a number of opportunities within planning that the government could capitalise upon to help others to decarbonise their own sectors, we have already discussed the opportunities in sustainable development so will highlight some other opportunities. Our research report *Planning for Smart Energy* detailed how smart energy grids have the potential to support a more sustainable energy mix, electric and driverless vehicle networks, new communications technologies, and more equitable forms of energy production and distribution, amongst other things. If the government were to invest in policies such as smart energy grids then they could help establish a secure energy network that is fit for the future and ready to help other sectors decarbonise alongside.

Whilst the government should provide greater direction from national policy to actors, they can also communicate the challenges of net zero more effectively to businesses and consumers. Whilst many are aware of net zero, the true scale of the challenge is perhaps not as well known.

As a result of this, clearer communication around what is required for net zero as well as how individual policies, projects and changes play their role in decarbonisation.

5. **Where and in what areas of policy focus could net zero be achieved in a more economically efficient manner?**

There are many improvements that could be made to net zero policy that would help in improving the economic efficiency of net zero. The challenges around nutrient neutrality and our proposed improvements with the Local Environment Improvement Plans are a perfect example of how to unlock opportunities for growth whilst protecting enhancing the environment.

Similarly, our research into smart energy grids highlights the economic benefits that can come from creating a grid that supports sustainable energy and in turn creates a more self-sufficient and secure energy grid. By establishing a more efficient energy grid that is ready for the demands of the future, we can reduce the demand for energy from overseas whilst contributing towards net zero.

Across these two examples there is a core theme of utilising policies that will facilitate net zero to help deliver economic benefits in unlocking opportunities for growth and development whilst creating a secure and self-sufficient energy network.

6. **How should we balance our priorities to maintaining energy security with our commitments to delivering net zero by 2050?**

Energy security has and will continue to be a topical issue for the foreseeable future and as a result of this and the role of energy within net zero it is crucial that we establish a clean, self-sufficient and secure energy network. By embracing a broad range of technologies we can ensure that our energy is both from renewable sources and secure in its generation. The recent calls to block the development of solar farms directly contradict our need to both deliver net zero and develop a diverse network of renewable energy technologies.

Alongside the need to diversify our renewable energy technologies, we must also look at how we can build greater energy security outside of energy generation. Energy storage and transmission are two pivotal elements of energy security that we must continue to explore. In places, the UK's energy infrastructure is outdated and inefficient, leading to energy being lost in transmission. Paired with this is the issue of energy storage. Battery storage should be one of the priorities for investment, allowing the network to store energy during peak times for generation and utilise the energy when it is most needed.

Consequently, a more complete transition towards renewable energy can help to create a more secure energy network if we are to invest in a more diverse portfolio of renewable energies, more efficient energy transmission and battery storage technologies. These investments would help to create a truly modern, green and secure energy network which would make significant contributions towards net zero.

7. **What export opportunities does the transition to net zero present for the UK economy or UK businesses?**

If some of the recommendations and opportunities highlighted in our previous answers were to be capitalised upon then our planning profession itself could be an export opportunity. In our report *Planning is Global* we detailed how the expertise, experience and reputation of town planning in the UK and Ireland is recognised globally and we feel more could be done to recognise its important contribution to global exports.

The reputation of planning in the UK would only be furthered if it were given the ability and position to be a key driving force for net zero. Our own research suggests that planning brings in millions to the UK and has the potential to have a much larger impact if the passion and expertise of our consultancies both large and small were showcased as one of our key exports alongside higher education, the creative industries and finance.

The reality of climate change is that it is a global problem that will require a global solution. It is a crisis that will require an enormous collective effort to overcome. The work of UK planners across the world has the potential to be a game-changer as we not only help ourselves but strive to help others too.

Questions for local government, communities and other organisations delivering net zero locally

24. What are the biggest barriers you face in decarbonising / enabling your communities and areas to decarbonise?

Because we are not the audience for these questions, we have not provided an answer.

25. What has worked well? Please share examples of any successful place-based net zero projects.

In our report *The Climate Crisis: A Guide for Local Authorities on Planning for Climate Change* we highlighted a number of case studies for effective place-based net zero projects. The paper highlights Cornwall Council's Climate Emergency Development Plan which outlines their plans to meet net zero emissions by 2030. The council recognised that the policies within their original local plan were insufficient and their Climate Emergency Development Plan updated many policies and introduced new ones with net zero at the heart of them. Reframing existing policies with net zero in mind is a crucial step in decarbonising our communities and environments.

Another example is the Test Valley Borough Council's renewable and low-carbon energy study which was undertaken in 2020. LUC (Land Use Consultants) and CSE (the Centre for Sustainable Energy) prepared a renewable and low-carbon energy study for Test Valley Borough Council. The study provides a robust evidence base to underpin planning policies relating to renewable and low-carbon energy generation and low-carbon development within the local plan. It identifies both the potential for different renewable technologies (wind, solar, hydropower, biomass, heat pumps, and geothermal) at all scales within the borough and the opportunities for development to draw its energy supply from decentralised or low-carbon energy sources, including district heating.

The final example that we wanted to promote was Bristol City Council's decision to make climate change an overall priority in the delivery strategy of their local plan. They made changes to ensure that development should contribute to both mitigating and adapting to climate change whilst also meeting targets to reduce carbon dioxide emissions. By reframing all new and existing developments through the lens of sustainability and climate change, Bristol City Council have made significant strides towards ensuring that they can futureproof the communities that they represent. Similar approaches to making climate change an overall priority in local plans were undertaken by Old Oak and Royal Park Development Corporation and Salford City Council.

26. How does the planning system affect your efforts to decarbonise?

The planning system should be viewed as an enabler for decarbonisation and in many ways, it is, however there are a number of obstacles that are limiting the effectiveness of the planning system in playing a leading role in decarbonisation. Planning has often been positioned in the mainstream as a 'blocker' for development and in turn decarbonisation, however a fully effective and robust planning system is an effective tool for unlocking growth and steering efforts towards net zero.

Perhaps the most pertinent issue is the resourcing and funding within planning. As previously outlined, public sector planning has faced drastic cuts to its funding which have in term limited the effectiveness of the system itself. For example, less than half (49%) of planning applications were decided within statutory time limits in 2021, which continues a downwards trend since 2010 alongside the falls in funding. Simply put, the planning system is not funded or resourced enough to deliver projects at speed and in turn help deliver net zero.

The issue of funding and resourcing, alongside previously outlined issues such as nutrient neutrality, outline the current barriers that are limiting planning from fulfilling its potential. When planning influences so many key issues, from where we live and work to how we travel and generate and transmit energy, the funding and resourcing of planning as a profession must be seen as a critical issue.

27. How can the design of net zero policies, programmes, and funding schemes be improved to make it easier to deliver in your area?

One of the most significant improvements that can be made to funding schemes would be to remove the inclusion of competitive bidding rounds in favour of allocating money to local areas in a single pot over a long term. This would help to create certainty for local areas which would in turn enable these areas to establish long term plans with net zero at their core.

If we are to tackle both climate change whilst delivering upon the Levelling Up agenda, then the long term security of funding is critical in allowing areas to commit towards long term plans for decarbonisation.

28. Are there any other implications of net zero or specific decarbonisation projects for your area that the Review should consider?

Because we are not the audience for these questions, we have not provided an answer.