

ENVIRONMENTAL POLICY FORUM

c/o Society for the Environment
297 Euston Road, London, NW1 3AD

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Response to the Department for Levelling Up, Housing and Communities reforms to the National Planning Policy Framework

Introduction

The Environmental Policy Forum (EPF) is a coalition of 13 professional bodies and learned societies representing around 70,000 environmental professionals across a variety of different disciplines. The views expressed are those of professionals, close to practice, duly qualified, and often working in industry, many running successful businesses. The EPF network strives to promote environmental sustainability and resilience for the public benefit.

We are grateful for the opportunity to input into these important reforms and have focused on answering the questions most relevant and pressing to us collectively.

We are more than happy to discuss further and illustrate our arguments with more examples and case studies from our extensive network of environmental professionals.

Response to individual questions

38 Do you agree that this is the right approach making sure that the food production value of high value farm land is adequately weighted in the planning process, in addition to current references in the Framework on best most versatile agricultural land?

- National and local planning policies have traditionally focussed on controlling land lost to development, primarily through the protection of agricultural land to maintain food and other biomass production. In response to wider environmental objectives, however, the professional focus is now on the protection and maintenance of soil functions, as well as controlling the loss of agricultural land. This is being addressed through the IEMA guidelines ("Land and Soils in EIA"), and to do so at a higher level in the NPPF would be a very effective top-down approach.
- Outside of wildlife habitats largely protected for biodiversity, most of our largely natural and undisturbed soils occur on agricultural land, and these soils have functions that have the potential to provide a wide range of terrestrial ecosystem services. Therefore, the NPPF should consider the conservation and sustainable reuse of soils that will be displaced by development proposals, as well as the loss of agricultural land.

39 What method or measure could provide a proportionate and effective means of undertaking a carbon impact assessment that would incorporate all measurable carbon demand created from plan-making and planning decisions?

- The built environment accounts for 25% of UK carbon emissions¹. Such carbon calculation for plan-making and planning decisions will be a considerable undertaking.
- Clear guidance is needed together with a standard process which does not involve significant cost and time. Hugely ambitious and important, this will be a considerable undertaking requiring wide cross-sector and cross-disciplinary collaboration.
- Given the role of green infrastructure adjacent to and supporting buildings, carbon calculation for the natural, as well as the built environment, needs to be included as part of these calculations.
- The Government's announced intention to consult, on its approach and interventions to mainstream the measurement and reduction of embodied carbon in the built environment, is welcomed and supported by the Environmental Policy Forum.

40 Do you have any views on how planning policy could support climate change adaptation further, specifically through the use of nature-based solutions that provide multi-functional benefits?

- Access to clean water is vital for new housing development. At a strategic level, additional reservoirs will increase capacities at a time when English summers are becoming hotter and drier.
- Encouraging homeowners and designers to deploy roof and other rainwater collection systems.
- Management of wastewater from development is a serious concern.
- Street trees provide multiple benefits and should be protected. They aid mitigation against climate change, by assisting with temperature regulation, reducing ultraviolet radiation and wind speeds leading to reduced heat loss from buildings in winter.
- Too often new streets do not incorporate trees, planting, or front gardens, and use excessive levels of paving which is high in embodied carbon and does not generate environmental net gain.
- Rain gardens are an excellent way of reducing water runoff.
- Continued and increased promotion of green roofs and walls to improve visual amenity, carbon capture, air quality and other benefits.
- Low carbon construction methods.
- Supporting habitat creation and nature recovery should include riparian, aquatic, and littoral habitats where fishes live, grow and breed. Planning policy can avoid detrimental impacts on rivers, lakes, estuaries, and seas. Free passage for fishes within river systems is fundamental. Impediments must be avoided or fully mitigated. It can and must address consequences for water quality and quantity whereby diffuse and spot pollutions from developments kill fish.
- Recent announcements from DEFRA (sustainable drainage systems - SuDS) and Natural England (Green Infrastructure Framework) are hugely welcome but need to be embedded across Government departments.
- Implementation of Biodiversity Net Gain needs to be strengthened with clear guidance provided to local authorities.

52 Are there other issues which apply across all or most of England that you think should be considered as possible options for National Development Management Policies?

- The wide-ranging impact of poor soil health² must be recognised. Within that it's vital to recognise the role soils play beyond agriculture and into areas such as sustainable soils in construction.

¹ Built environment 25% of UK carbon emissions <https://www.ukgbc.org/climate-change-2/>

² Soil health <https://wp.lancs.ac.uk/sustainable-soils/files/2022/09/Soils-in-Planning-and-Construction-Sept-22.pdf> and <https://socenv.org.uk/wp-content/uploads/2022/02/21FINAL-Soils-and-Stones-report.pdf>

- The impact of planning on water as well as land needs to be considered. Redundant barriers to fish movements should be removed.
- There is a need to standardise good practice and for policy to reflect a joined-up approach. The natural and built environments are inextricably linked and should be considered in harmony.

55 Do you think that the government could go further in national policy, to increase development on brownfield land within city and town centres, with a view to facilitating gentle densification of our urban cores?

- Funding for environmental regulators, such as local authority environmental health teams and the Environment Agency, should be ensured so that resources meet what is needed.
- Higher standards need to be asked of consultants engaged in supporting developers to produce plans for brownfield sites. This will ensure that applications for such sites reach a significantly high threshold, so not to overburden local authorities faced with reviewing inadequately prepared planning applications.
- Insufficient consideration has been afforded to any unintended consequences of potentially reducing barriers for development in densely populated areas. This relates to cases where there are planning constraints to overcome such as contaminated land, air quality and noise pollution, all of which can have deleterious effects on health.

57 Are there any specific approaches or examples of best practice which you think we should consider to improve the way that national planning policy is presented and accessed?

- We have concerns over the implementation of these reforms given the current workload and resource levels of local authorities.
- More widely, there are widespread skills gaps and shortages across the environmental profession which will affect implementation of these reforms. These skills gaps and shortages affect the quality of the key work that the profession provides to society and endangers professional standards. This skills challenge must be addressed, otherwise the intended interconnected social, economic, and environmental benefits of these reforms cannot be realised.



envpolicyforum.org.uk

Signed on behalf of the following organisations,

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Notes

1. The Chartered Institute of Environmental Health (CIEH) is the membership and awarding body for the environmental health sector. Our members work around the world, improving lives and demonstrating excellence across all areas of environmental health including food, public health, housing, environmental protection, and health and safety. cieh.org
2. The Chartered Institution of Wastes Management (CIWM) is the leading professional body for the resource and waste management sector representing over 5,500 individuals in the UK, Ireland and overseas. Established in 1898, CIWM is a non-profit making organisation, dedicated to the promotion of professional competence amongst waste managers. CIWM seeks to raise standards for those working in and with the sector by producing best practice guidance, developing educational and training initiatives, and providing information on key waste-related issues. It uses the body of knowledge represented by its membership to inform and influence policy and regulation on resources and waste management to increase resource efficiency and productivity and promote sustainable development. ciwm.co.uk
3. The Institute of Chartered Foresters (ICF) is the Royal Chartered body for Foresters and arboriculturists in the UK. ICF regulates standards of entry to the profession, doing so by the provision of services and support to its members; guidance to professionals in other sectors; information to the general public; and educational advice and training to students and tree professionals seeking to develop their careers in the forestry and arboriculture industry. ICF works to foster a greater public awareness and understanding of the tree professions in order to serve a variety of commercial, recreational, environmental and scientific interests. charteredforesters.org
4. The Institute of Environmental Management and Assessment (IEMA) is a professional body with around 20,000 members. Our members are sustainability experts working in public and private sector roles across a wide range of industries from financial services to development and construction. Through a combination of training programmes, sharing of best practice, and thought leadership and advocacy, we work with our members to drive change in areas such as corporate sustainability, climate change and energy, the circular economy, environmental management, and impact assessment. iema.net
5. The Institute of Fisheries Management (IFM) is an international organisation of people sharing a common interest in the modern management of recreational and commercial fisheries. ifm.org.uk
6. The Institution of Environmental Sciences (IES) is a membership organisation that represents professionals from fields as diverse as air quality, land contamination and education - wherever you find environmental work underpinned by science. A visionary organisation leading debate, dissemination and promotion of environmental science and sustainability, the IES promotes an evidence-based approach to decision and policy making. the-ies.org
7. The Landscape Institute (LI) is the chartered body for the landscape profession. It is an educational charity working to promote the art and science of landscape practice. The LI's aim, through the work of its members, is to protect, conserve and enhance the natural and built environment for the public benefit. The Landscape Institute provides a professional home for

all landscape practitioners including landscape scientists, landscape planners, landscape architects, landscape managers and urban designers. landscapeinstitute.org

8. The Society for the Environment (SocEnv) is comprised of 24 Licenced Bodies, with over 500,000 members between them. It received a Royal Charter in 2004, which empowers it to regulate the Chartered Environmentalist (CEnv) and Registered Environmental Technician (REnvTech) professional registrations globally. There are now over 7,500 environmental professionals currently registered who share a common vision of delivering sustainability through environmental professionalism. socenv.org.uk