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The overarching purpose of planning should be to create healthy, just and sustainable places in the changing climate. In summary, our eight shared principles are as follows.

### **Principles we can pursue now**

**1 - 30 by 30: making space for nature's recovery** Establishing the working baseline for nature protection by mapping the land currently being actively managed for nature, committing to a '30 by 30' trajectory, and developing multi-functional approaches to future land use.

**2 - Using planning to stimulate economic transformation** Ensuring that local economic strategies, climate action plans and Local Plans are aligned, and are geared to supporting decarbonization, climate resilience and nature recovery.

**3 - Implementing modal shift in travel** Decoupling productivity from road traffic, and aligning planning policies to ensure that public and active modes become the most attractive choice for a much larger share of journeys.

**4 - Reducing inequalities and supporting a just transition** Using new development to enhance places for everyone, for example through measures such as 15/20-minute neighbourhoods, green space interventions and more targeted use of developer contributions.

### **Principles needing better evidence or national policy change**

**5 - Enabling local carbon budgets as planning evidence** Planning authorities need the flexibility to go further and faster than national policy in carbon reduction. If planning policies and decisions can only be justified against the national 2050 target, authorities may struggle to meet their local aspirations.

**6 - Meeting housing and climate challenges in tandem** Homes are still being built which will require costly retrofitting for the future. This is contributing to an accumulating problem of housing stock that is not fit for the future and is not addressing cost of living challenges. Unsustainable development should not go ahead just because it is viable.

**7 - Supporting renewable energy and retrofit** Planning authorities need more power to set positive policies for community energy, to refuse development that does not incorporate decarbonisation measures, and set clear design expectations for adapting heritage buildings.

**8 - Adapting to 2 degrees of warming, but preparing for 4 degrees** Developments taking place now will be with us for 50 to 100 years, or more, so they should be resilient to a 2-degree warming scenario from their inception, and the design life of new developments and infrastructure should allow for a 4-degree scenario.

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### **How and why we have developed our Shared Principles**

The Yorkshire & Humber Climate Action Plan<sup>1</sup> was co-created by our Commissioners, who are drawn from the public, private and third sectors. It was prepared through public consultation, and is supported by the Yorkshire Leaders' Board. It represents a broad, shared agenda for the region's response to the climate emergency. The impact of this high-level collaboration is being demonstrated through a fantastic range of specialist workstreams, such as net zero, future economy and nature's recovery. A Local Authorities' Climate Adaptation Programme, and a Climate Pledge for Business are two recent innovations, with a number of authorities already supporting them.

The Commission's Regional Policy Forum meets quarterly and includes officers and members from all the region's local and combined authorities, and is currently co-chaired by the Deputy Leader of Wakefield Council and the Chief Executive of Sheffield City Council. At the October 2022 meeting the Forum agreed to draw up some shared, high-level principles for how the planning system should enable climate action. These principles were then drafted with the help of two task & finish workshops involving over 30 planning officer and portfolio holders from around the region.

The February 2023 Forum determined to seek the support of the Yorkshire Leaders' Board for our shared principles. Following this, Yorkshire & Humber Councils facilitated a consultation with its members to explore authorities' views on supporting the principles, and several comments were received. The comments were broadly very positive, reflecting the extent to which officers and members had already been involved. Some concerns were raised, and these focused on three issues:

- Whether the principle of using carbon budgets as planning evidence is constrained by insufficient or inconsistent data;
- Whether the reference to 15/20 minute neighbourhoods is compromised by the negative media attention these have received recently;
- Whether the principle of asking government to put social housing on a statutory footing is relevant and workable.

To resolve these concerns without diluting the overall vision that the principles articulate, we have made some amendments to the text and, most importantly, clarified the distinction between those principles that are already well-embedded in local authorities' approaches to planning policy; and those which are less settled, require more data and may depend on changes to national policy or

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<sup>1</sup> <https://yorksandhumberclimate.org.uk/sites/default/files/Climate%20Action%20Plan.pdf>

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legislation, but which nevertheless express principles that authorities would like to see built into the planning system. This distinction enables us to see which aspects can feed directly into Local Plans as they are reviewed, compared to those which provide prompts for research, evidence-building and national level advocacy.

### **The Aim of our Shared Principles**

The planning system has a crucial role in a wide range of climate actions, and the principles aim to express how that role can best be fulfilled. The Royal Town Planning Institute (RTPI) and Town & Country Planning Association (TCPA) are unequivocal that “every decision we take must count towards securing our long-term survival”<sup>2</sup> but national planning policy has not kept up with the pace of local authorities’ appetite for action. Our shared principles therefore include aspects where we are seeking better, stronger national policies, as well as other elements that planning authorities can pursue in the existing policy context.

The government states that planning can support climate action by “*bringing together the spatial strategy for a place in a way which addresses these issues in a holistic way and reflects its unique characteristics, whilst also providing a clear framework for development and regeneration.*”<sup>3</sup> With the support of the Yorkshire Leaders’ Board, we hope to engage in dialogue with national politicians and government departments through our National Policy Forum, to strengthen the support that planning policy provides for climate action, and to address some of the obstacles that planning authorities encounter when putting their aspirations into practice.

### **The Purpose of Planning in a Changing Climate**

The principles of sustainable development demand simultaneous progress on social, environmental and economic fronts. A plan-led system which directs the locations, types and standards of development to equally prioritise affordability, sustainable travel, carbon reduction and nature recovery will stimulate the industry and skills to deliver those forms of development. Therefore we believe that the overarching purpose of planning should be to create healthy, just and sustainable places in the changing climate.

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<sup>2</sup> <https://tcpa.org.uk/wp-content/uploads/2021/11/TCPA-RTPI-Climate-Guide-4th-edition-1.pdf>

<sup>3</sup> <https://www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy>

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### **In detail: Principles we can pursue now**

#### **1 - 30 by 30: Making space for nature's recovery**

The UK government supports the global pledge to protect 30% of land for nature by 2030 ('30 by 30'), and claims that this is against a baseline of 26%. However, Wildlife & Countryside Link (WCL) reports that at present only 3-4% of England's land is effectively protected and managed for nature. The discrepancy arises mainly because the government figure includes all land in National Parks and AONBs as 'protected', ignoring the fact these areas are principally protected for the character and quality of their landscapes, not their ecological value. WCL is also very concerned that de-regulatory reforms, especially in the Levelling Up & Regeneration Bill and the Retained EU Law Bill, pose high risks to the integrity of current environmental protections which the planning system relies upon.

The planning system needs to fulfil its role in making space for nature's recovery. We can pursue this now by:

- Establishing the working baseline for nature protection by mapping the land currently being actively managed for nature;
- Committing to a '30 by 30' trajectory, including cross-boundary integration of the land covered by Green/Blue Infrastructure Strategies, Local Nature Recovery Strategies, and landscape-scale nature recovery programmes in National Park and AONB Management Plans;
- Ensuring that design codes can cater for multi-functionality, by which the same land can provide both built development and nature recovery;
- Effective application of the flood risk sequential and exception tests to avoid unnecessary exposure to flood risk could have secondary benefits by leaving more space for nature recovery and increasing resilience.

National policy should also enable planning authorities to set development management policies protecting and targeting land with currently lower ecological value, where this will help implement Local Nature Recovery Strategies.

#### **Key Evidence:**

Government Press Release on 30 by 30:

<https://www.gov.uk/government/news/pm-commits-to-protect-30-of-uk-land-in-boost-for-biodiversity>

Wildlife & Countryside Link – Progress Report on 30 by 30 in England:

[https://www.wcl.org.uk/assets/uploads/img/files/WCL\\_2022\\_Progress\\_Report\\_on\\_30x30\\_in\\_England.pdf](https://www.wcl.org.uk/assets/uploads/img/files/WCL_2022_Progress_Report_on_30x30_in_England.pdf)

Natural England Green Infrastructure Mapping:

<https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Map.aspx>

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## 2 - Using planning to stimulate economic transformation

The work of our Combined Authorities and Local Economic Partnerships shows that the economic risks and opportunities in the climate and nature emergencies are well understood, and that there is high-level commitment to achieving prosperity in the changing climate. It is also widely recognised that shortages of skills, uncertainties in supply chains, and inconsistent regulatory frameworks are all holding businesses back from growing in these sectors. This in turn may lead to a continued reliance on less forward-looking approaches to development to sustain local economies. Chris Skidmore's 'Mission Zero' report sets out a clear, unequivocal rationale for channelling economic development into the task of climate action.

The planning system needs to become much better at supporting this economic transformation. We can pursue this now, by:

- Ensuring that local economic strategies, climate action plans and Local Plans are aligned and clearly state the economic imperative of inclusive climate action;
- Co-operating across the region to growing the markets, skills and supply chains needed to deliver zero-carbon developments, adaptive and resilient infrastructure and nature recovery;
- Ensuring that the locations and types of economic development supported by Local Plans development management policies, are geared to supporting decarbonization, climate resilience and nature recovery.

Additionally, we need to seek and share best practice in aligning local economic priorities with carbon reduction pathways, and using the planning system to deliver win-win outcomes for both. This will pose place-specific challenges, for example where airports, motorways and logistics industries are inherited economic drivers that inform the baseline for spatial planning.

### Key evidence:

Mission Zero – Review of the UK Net Zero Strategy:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1128689/mission-zero-independent-review.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1128689/mission-zero-independent-review.pdf)

York & North Yorkshire LEP – Routemap to Carbon Negative:

<https://www.ynylep.com/Portals/0/adam/BlockText/5IOnFY0E7kiu3jLUPSDm5A/BodyText/York%20%20North%20Yorkshire's%20Routemap%20to%20Carbon%20Negative%20040123.pdf>

West Yorkshire Climate & Environment Plan: <https://www.westyorks-ca.gov.uk/media/7382/west-yorkshire-climate-and-environment-plan.pdf>

### 3 - Implementing modal shift in travel

In our region, West Yorkshire Combined Authority's Climate & Environment Plan plots a series of emissions reductions scenarios with specific actions and targets to achieve them. In the 'balanced' scenario which takes account of barriers to greater ambition, the targets include:

- Increases in distances walked by 5-9% by 2025, and up to 17% by 2038;
- Twofold to threefold increases in distances cycled by 2025;
- Public transport use 1.5 to 2 times higher by 2038;
- 20-40% reduction in private car mileages by 2030;
- 10% shift of freight volume onto rail by 2030.

Planning policies for decades have not produced hoped-for reductions in car dependence, and this needs urgently to change. The Yorkshire Leaders' Board has agreed a set of regional transport priorities which, taken as a whole, amount to a major emphasis on investment in rail, buses, integrated travel and active travel, and should therefore support modal shift. Transport for the North's draft Strategic Transport Plan embraces the decoupling of productivity from road traffic, combining a suite of pan-northern economic targets with a zero overall increase in private car mileage against a 2018 baseline.

We can pursue this now, by:

- Aligning planning policies to ensure that public and active modes become the most attractive choice for a much larger share of journeys;
- Changing the key planning policy objective from 'reducing the need to travel by car' – which is a means, to 'reducing private car mileage through increased active travel and public transport' – which is a goal.

This approach is consistent with NPPF and is strongly based in regional evidence. However, we note that the recent draft revised National Networks National Policy Statement is based on assumptions of substantial road traffic growth, which would be incompatible with aspirations in our region and across Northern England and could pose a significant risk to modal shift. We hope that government will amend the NPS approach to remedy this.

#### Key Evidence:

West Yorkshire Climate & Environment Plan:

<https://www.westyorks-ca.gov.uk/media/7382/west-yorkshire-climate-and-environment-plan.pdf>

RTPI – Net Zero Transport:

<https://www.rtpi.org.uk/media/9233/rtpi-net-zero-transport-january-2021.pdf>

Transport for the North's Strategic Transport Plan:

<https://transportforthenorth.com/our-north/strategic-transport-plan/>

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#### **4 - Reducing inequalities and securing a just transition**

NPPF attributes a role to planning in supporting healthy and inclusive places, but in practice the planning system often falls short in this respect. This is partly because the existing environmental quality of an area forms the benchmark for the expectations placed on new development in that area, and developer contributions do not raise enough funds to support enhancement of those neighbourhoods.

Many spatial inequalities coincide: people experiencing poorer housing, public transport and access to green space are also less healthy and less engaged in the planning system. For the planning system, making healthy, inclusive and resilient places is therefore about using new development to intervene in and enhance neighbourhoods, in multi-disciplinary ways that benefit local circumstances.

We can pursue this now, by:

- Using access to a key set of amenities as a core placemaking principle – for example through 15/20-minute neighbourhoods, or by considering how groups of small settlements function together in rural areas;
- Implementing the Environmental Improvement Plan requirement for everyone to have green or blue space within 15-minute walk;
- Clarifying the definitions in planning policy of community benefit – for example when using the exception test for development in flood risk zones – to ensure that development decisions will make conditions better for citizens who are exposed to climate-based risks.

Making better and more targeted use of developer contributions remains a challenge, especially in areas with lower development values. Biodiversity Net Gain and the new Infrastructure Levy would both benefit from place-based assessments of the climate and inclusion actions that are needed, though we note the broad concern in the planning profession that the Infrastructure Levy as proposed risks reducing the financial contributions being raised.

Key Evidence:

RTPI – 20 Minute Neighbourhoods: <https://www.rtpi.org.uk/research/2021/march/20-minute-neighbourhoods/>

Defra – Environment Improvement Plan 2023:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1133077/environmental-improvement-plan-2023.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1133077/environmental-improvement-plan-2023.pdf)

Industry bodies ask Michael Gove to scrap Infrastructure Levy:

<https://www.housingtoday.co.uk/news/industry-bodies-ask-michael-gove-to-scrap-infrastructure-levy/5123698.article>

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**In detail: Principles needing better evidence or national policy change****5 - Enabling local carbon budgets as planning evidence**

Planning authorities need the flexibility to go further and faster than national policy in carbon reduction. The Yorkshire Leaders' Board has committed the region to reaching net zero by 2038, with some authorities in the region setting local targets even sooner, and they should be empowered to deliver them through decision-making. If planning policies and decisions can only be justified against the national 2050 target, authorities may struggle to meet their local aspirations.

The political commitments to local net zero targets are supported by a wealth of technical evidence. West Yorkshire Combined Authority's Climate & Environment Plan and the York & North Yorkshire LEP's Routemap to Carbon Negative both contain detailed and ambitious carbon mitigation pathways, showing the scale and range of decarbonisation needed in each emissions sector. The former has a 2038 net zero target and the latter 2034.

Planning authorities therefore need the power to align plans and decisions with emissions reduction, by giving significant weight to their own carbon mitigation pathways as a key evidence base for plan-making, and as material considerations in determining planning applications, including where this means deeper and more rapid reductions than national targets. Planning authorities consider that assessment data and methods aren't yet robust enough to track the carbon impacts of a Local Plan, and Yorkshire & Humber Climate Commission is currently working to help address this knowledge gap.

The NPPF requirement for planning to achieve radical reductions in greenhouse gas emissions can only be properly fulfilled when:

- National policy explicitly commits the planning system to delivering Carbon Budgets;
- Local Plan production includes a whole-plan carbon assessment, showing how the emissions arising from new development can be reconciled with the authority's relevant Carbon Budget for the plan period;
- Planning applications for new development demonstrate at least the operational and embodied carbon performance required to be consistent with that Local Plan.

**Key Evidence**

West Yorkshire Climate & Environment Plan: <https://www.westyorks-ca.gov.uk/media/7430/west-yorkshire-climate-and-environment-plan.pdf>

York & North Yorkshire Local Enterprise Partnership – Routemap to Carbon Negative:

[https://www.ynylep.com/Portals/0/adam/Document%20Manager/zQHELN5FH0STZE15yD1OdA/Doc\\_Link/20722%20YNY%20LEP%20Board%20agenda%20and%20Reports.pdf](https://www.ynylep.com/Portals/0/adam/Document%20Manager/zQHELN5FH0STZE15yD1OdA/Doc_Link/20722%20YNY%20LEP%20Board%20agenda%20and%20Reports.pdf)

UK 100 – Local Authority Contributions to Net Zero:

<https://www.uk100.org/publications/local-authority-contributions-net-zero>



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## 6 - Meeting housing and climate challenges in tandem

Access to decent housing for everyone, and places that are fit for purpose in a changing climate, cannot be regarded as negotiable benefits of development. They should be the basic tenets of all development, and it is wrong to trade them off against each other or against quantitative delivery of dwellings, because to do so is to allow unsustainable outcomes. Homes are still being built which will require costly retrofitting to become operationally zero carbon and to be adapted to the increasing risk of extreme weather. This is contributing to an accumulating problem of housing stock that is not fit for the future and is not addressing cost of living challenges.

We support the mandatory requirement for biodiversity net gain, and we also wish to see a mandatory requirement for development to contribute to meeting carbon budgets, as set out above. However, these will not produce sustainable outcomes if they are traded off against affordable housing delivery due to viability arguments. Put simply, an unsustainable development should not go ahead just because it is viable. Research by the New Economics Foundation shows that, in the face of increasing building costs, relying on developer contributions as a mechanism to deliver social and affordable housing isn't working, especially in the north and the midlands.

One solution would be for the planning system to include a statutory duty to deliver genuinely affordable housing, with authorities able to determine their preferred tenure mix based on local evidence. The duty housing would prevent affordable housing being traded off, and help set a clear course for the planning system to meet the housing and climate challenges together in a socially just manner. It is likely that land market interventions and additional finance for social housing will be needed to complement the duty, especially considering that the new Infrastructure Levy is unlikely to raise sufficient contributions in many authority areas. Without these changes, planning authorities' ability to deliver homes that are both socially and environmentally sustainable is likely to remain constrained by viability trade-offs.

### Key Evidence:

Places for People – Net Zero Ready New Build Housing:

<https://www.placesforpeople.co.uk/media/ztbocixy/net-zero-ready-new-build-housing.pdf>

New Economics Foundation – Squeezed Out: <https://neweconomics.org/2021/12/squeezed-out>

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## **7 - Supporting renewable energy and retrofit**

Many communities support renewable energy, especially where it is led or initiated by the community. Recent research by CPRE, the Countryside Charity, found that communities are more than willing to engage in envisioning the energy solutions that would equip them for a low-carbon future. This contrasts with the perception that public opposition is a barrier to renewable energy take-up.

The planning system does not currently distinguish between smaller, community-led schemes and larger, commercial-scale developments, and there is a risk that this is inhibiting the delivery of renewable energy needed to fulfil the Energy Security Strategy. We consider that this size distinction should be made. We are also very keen to see grid connection challenges addressed, unlocking practical barriers to bringing local renewables on-stream.

There is currently a lack of planning policy and guidance on energy storage at both utility scale and on-site within development schemes. It would be very helpful for government to address this quickly, because Local Plan reviews happening now are hoping to include strategic policies and development management policies for storage.

Planning requirements for conversions, refurbishments, extensions and changes of use are not fit for purpose in accelerating the take-up of energy efficiency and low-carbon energy through retrofit of buildings or of neighbourhoods. Building Regulations do not set a high enough bar to remedy the problem, and only apply at the level of the individual building so cannot address wider site or neighbourhood considerations. Planning authorities should have the power to remove Permitted Development rights for works that do not incorporate de-carbonisation measures, and conversely to use Local Development Orders to assist in driving neighbourhood-scale measures such as heat networks.

Many areas of Yorkshire & Humber are characterised by their architectural heritage which is protected mainly through Conversation Areas, as well as through listing. Planning authorities should be given more power to set clear design expectations for heritage retrofit and, in particular, to give weight to the benefits of decarbonisation and retrofit in maintaining the condition and vitality of heritage settings.

### Key evidence:

CPRE Community Energy Visioning Project: <https://www.cpre.org.uk/what-we-care-about/climate-change-and-energy/renewable-energy/community-energy-visioning-showcasing-renewables-done-well/>

Historic Scotland – Guide to Energy Retrofit of Traditional Buildings:

<https://www.historicenvironment.scot/archives-and-research/publications/publication/?publicationId=47c9f2eb-1ade-4a76-a775-add0008972f3>

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## **8 - Adapting to 2 degrees of warming, but preparing for 4 degrees**

The 2<sup>nd</sup> National Adaptation Programme (NAP) (2018-23) principally identifies flood risk and biodiversity net gain as the planning system's levers for adaptation and resilience. The 3<sup>rd</sup> NAP will be published in 2023, and we hope that it will recognise planning's role in managing a wider range of risks set out in the Climate Change Risk Assessment 2022. These include the resilience of the economy to climate-related shocks, and exposure to hot and cold temperatures in homes and other buildings.

A 2019 report for the UK Climate Change Committee found that Green and Blue Infrastructure (GBI) strategies and policies were not adequately considering the role of GBI in providing adaptation and resilience of urban environments, and that this risked locking in a missed opportunity for more resilient places. Ensuring that all GBI strategies and policies are explicitly geared to adaptation and resilience is therefore crucial, and in our view the principle of 'adapt to 2 degrees, prepare for 4 degrees' should be embedded across the planning system as a whole.

Developments taking place now will be with us for 50 to 100 years, or more. Therefore:

- the measures and interventions needed to provide resilience in a 2-degree warming scenario should be implemented now;
- the design life of new developments and infrastructure should allow for a 4-degree scenario. Green and Blue Infrastructure strategies and programmes should clearly set out their climate adaptation outcomes, whose implementation should be given great weight in planning decisions.

### Key Evidence:

Defra – National Climate Adaptation Programme:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/727252/national-adaptation-programme-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/727252/national-adaptation-programme-2018.pdf)

HM Government: Climate Change Risk Assessment 2022:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1047003/climate-change-risk-assessment-2022.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1047003/climate-change-risk-assessment-2022.pdf)

Climate Change Committee – Impacts of Climate Change on Meeting Government Outcomes:

<https://www.theccc.org.uk/wp-content/uploads/2019/07/Outcomes-Impacts-of-Climate-Change-on-Meeting-Gov-Outcomes-Summary.pdf>

Climate Change Committee – Adapting to a Warmer UK: <https://www.theccc.org.uk/uk-action-on-climate-change/adapting-to-a-warmer-uk/>