



ENVIRONMENTAL POLICY FORUM

c/o Society for the Environment

297 Euston Road, London, NW1 3AD

www.envpolicyforum.org.uk

[Contact: sarah.ridgeon@socenv.org.uk](mailto:sarah.ridgeon@socenv.org.uk)

Planning Policy Consultation Team
Planning Directorate – Planning Policy Division
Ministry of Housing, Communities and Local Government
Floor 3, Fry Building
2 Marsham Street
London
SW1P 4DF

By email only to: PlanningPolicyConsultation@communities.gov.uk

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Dear Sir/Madam,

The Environmental Policy Forum (EPF) welcomes the opportunity to respond to the **MHCLG consultation on National Planning Policy Framework: proposed reforms and other changes to the planning system.**

The EPF is a coalition of 16 professional bodies and learned societies promoting environmental sustainability and resilience for the public benefit. Collectively we represent around 170,000 qualified members, including business leaders and qualified public and private professionals across a wide range of different specialised disciplines.

Together, we have delivered cross-sector consensus on the [ten environmental priorities](#) which policymakers must urgently address. These priorities are based on the challenges experienced by practitioners working across disciplines, and the numerous opportunities that exist to address these barriers and achieve economic growth. Each priority contains specific asks for policymakers, which should be achieved through support from business.

This response is not confidential and the EPF is happy for our response to be made public and considered as part of the open consultation process.

Our response

Overall, despite some welcome proposals, we are concerned about the reforms set out in this consultation. Our concerns can be summarised through the following overarching points:

- **The need for a holistic approach:** There are huge opportunities associated with sustainable housebuilding which these reforms – and UK policy in general – fail to fully recognise. By investing in creating well-designed places and healthy communities, including not only sustainably built homes but sustainable transport, community spaces, landscape, recycling and waste provision, there are associated benefits to our health, society, safety, economy and environment.

We note that water is dealt with in a number of chapters, each through a different lens. This is inconsistent with the vision in the recently published [water white paper](#) to integrate water management for people and nature, including pollution prevention. To assist this holistic approach, we are calling for the adoption of a national strategic policy on soils, as well as for water, which reflects the huge importance of good practice in soil management and its relationship with water management, throughout the development process in both infrastructure and individual plot developments.

- **Significant regression on climate policy:** The proposed reforms mark a tangible and significant regression on climate policy, as they create a much more permissive planning regime, which will be open to abuse. Examples of regression include that to flood risk policy (such as the weakening of the sequential test for flooding meaning surface water flood risk doesn't preclude development, and suggesting mitigating, rather than avoiding, risk is appropriate) and the prohibition of local plan policies for net zero carbon homes. There is a glaring absence of any development measures associated with water scarcity, such as local rainwater and greywater harvesting for non-potable use. In addition, whilst we welcome the requirement for national standards for sustainable drainage systems, we are concerned this planning-led approach will not drive their delivery in all new developments.

Consequently, the reforms outlined in this consultation mark a threat to meeting our climate commitments. There are positives – as noted above, as well as requiring development proposals to consider both current and future climate impacts over the lifetime of the development – but overall, too much is just “encouraged” in relation to climate change mitigation and adaptation, and not enough is “mandated”.

- **The need for evidence-based ambition:** National minimum standards aligned to a net zero trajectory should be welcomed as they give industry certainty of return, in order to invest. But going beyond that, local ambition – where viable and evidence based – should be enabled, as it drives innovation and accelerates progress. There is no room for

experimentation with the proposed approach, and we are concerned that the reforms will limit local action in other areas such as embodied carbon assessments and overheating assessments – especially in the absence of a regulatory framework on embodied carbon. The [Climate Change Committee](#) has been clear: without ambitious local action and delivery, the UK will fail to meet its target to reach net zero by 2050¹.

- **The role of skills, expertise and assessment:** We agree with the presumption in favour of previously developed brownfield sites. However cautious assessment of brownfield sites is still needed within a brownfield first approach, as they can be extremely rich in biodiversity. Biodiversity and community spaces do exist on and around potential brownfield development sites, and as a result, adoption of bespoke solutions for complex brownfield sites is often required. Thorough impact assessments, with landscape and ecological surveys, led by experts, should be carried out before development takes place. It is also vital that local authorities have the resources and skills necessary to make these expert-led decisions.
- **The economic costs and missed opportunities:** By limiting local standards for energy efficiency, we are concerned that this will make it difficult for the construction sector to adapt and deploy energy efficiency technologies at scale. These technologies provide many economic opportunities, which under these reforms may therefore be missed. In terms of likely costs, restricting local powers now risks not only locking in emissions for decades but also creating costly retrofit challenges. In addition, the proposed changes to flood risk policy fail to recognise the likely long-term costs of this approach. The reforms are at odds with the required precautionary approach to flood and coastal risk, where nature-based and managed-retreat solutions should be central to long-term resilience.

Again, we are grateful for the opportunity to provide our response to this consultation and would be pleased to present you with further evidence from our extensive network of professionals.

Yours faithfully,

Professor William Pope FIEnvSci, HonFSE, CEnv, CSci
Chair, Environmental Policy Forum

Sarah Ridgeon MCIPR

Secretariat, Environmental Policy Forum

Signed on behalf of the following organisations:

Dr Phil McCluskey,
Senior Policy & External Affairs Manager,
British Ecological Society



Tara Page,
Chief Executive, Chartered Institute of
Architectural Technologists



Amanda Williams,
Head of Environmental Sustainability,
Chartered Institute of Building



Sally Hayns,
CEO, Chartered Institute of Ecology and
Environmental Management



Tina Benfield,
Technical Manager, Chartered Institution of
Wastes Management



Catherine Moncrieff,
Head of Policy and Engagement,
Chartered Institution of Water and
Environmental Management



Louise Simpson,
CEO, Institute of Chartered Foresters



Paul Coulson,
Chief Executive, Institute of Fisheries
Management



Joseph Lewis,
Head of Policy, Institution of Environmental
Sciences



Billy Piper,
Secretary, Sustainability Forum, Institution of
Royal Engineers



Dr Emma Wilcox
Chief Executive, Society for the Environment



Notes:

1. The British Ecological Society (BES) is the largest scientific society for ecologists in Europe with a membership of 7,000 in over 120 countries around the world. We support the ecology community at all stages of their careers through our journals, meetings, grants, and education and policy work. The first ecology society to be established anywhere in the world, we have been the champion of ecology for more than a century. britishecologicalsociety.org
2. The Chartered Institute of Architectural Technologists (CIAT) is a dynamic, forward-thinking and inclusive global membership qualifying body for Architectural Technology. It exists as a not-for-profit organisation to lead, represent and promote Architectural Technology and to set and maintain the standards for education, practice and professionalism. As a regulated Chartered qualification CIAT also has a societal responsibility. It is the only international body permitted to award the regulated and protected qualification, 'Chartered Architectural Technologist' and the protected designations MCIAT or FCIAT. This status recognises the distinct nature of the Architectural Technology discipline and reflects the prestigious and independent character of the Institute. architecturaltechnology.com
3. The Chartered Institute of Building (CIOB) are the world's largest and most influential professional body for construction management and leadership. Our members work

worldwide in the development, conservation, and improvement of the built environment. We accredit university degrees, educational courses, and training. Our professional and vocational qualifications are a mark of the highest levels of competence and professionalism, providing assurance to clients and other professionals procuring built assets. ciob.org

4. The Chartered Institute of Ecology and Environmental Management (CIEEM) is the leading professional membership body representing and supporting over 7,300 ecologists and environmental managers in the UK, Ireland and abroad. Their vision is of a society which values the natural environment and recognises the contribution of professional ecologists and environmental managers to its conservation. cieem.net
5. The Chartered Institution of Wastes Management (CIWM) is the leading professional body for the waste management sector representing over 5,500 individuals in the UK. 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. ciwm.co.uk
6. The Chartered Institution of Water and Environmental Management (CIWEM), is the leading independent Chartered professional body for water and environment professionals, promoting excellence within the sector. ciwem.org
7. The Institute of Chartered Foresters (ICF) is the Royal Chartered home for tree professionals across the UK. It is the only UK body to offer both Chartered Forester and Chartered Arboriculturist titles. As part of its ongoing strategic objectives, the Institute regulates standards of entry to the profession; supports members and provides guidance to professionals in other sectors; offers educational advice and training to both students and tree professionals seeking to develop their careers and works to foster a greater public awareness and understanding of forestry and arboriculture. charteredforesters.org
8. The Institute of Fisheries Management (IFM) is an international organisation of people whose aim is to support and promote sustainable fisheries management for the benefit of our members, fisheries, wildlife and society. ifm.org.uk
9. The Institution of Environmental Sciences (the IES) is at the forefront of uniting the environmental sciences around a shared goal: to work with speed, vision and expertise to solve the world's most pressing environmental challenges, together. As the global professional membership body for environmental scientists, we support a diverse network of professionals all over the world – and at every stage of their education and careers – to connect, develop, progress and inspire. the-ies.org
10. The Institution of Royal Engineers (InstRE), established in 1875 and granted a Royal Charter in 1923, serves as a professional and learned society dedicated to advancing military engineering. With a membership exceeding 10,000 individuals, comprising both serving

and retired personnel from the Corps of Royal Engineers and allied international military engineers, InstRE promotes the art and science of military engineering through professional development, publications, and events. It supports engineering excellence by facilitating professional registration, innovation and sustainable outcomes, alongside maintaining historical archives and museum of engineering, thereby enhancing the operational effectiveness and heritage of military engineering. instre.org

11. The Society for the Environment (SocEnv) defines the standards for professional competence in environmental practice, ensuring key decisions are made by verified professionals. Having received a Royal Charter in 2004, we license professional institutions to award the Chartered Environmentalist (CEnv), Registered Environmental Practitioner (REnvP) and Registered Environmental Technician (REnvTech) professional registrations. There are now over 9,000 registered environmental professionals, sharing a common vision of delivering a sustainable future shaped by environmental professionalism. socenv.org.uk

ⁱ [The Seventh Carbon Budget](#)