

IEMA RESPONSE TO THE ENVIRONMENTAL AUDIT COMMITTEE: ENVIRONMENTAL SUSTAINABILITY AND HOUSING GROWTH INQUIRY

ABOUT IEMA

The Institute of Environmental Management and Assessment (IEMA) is the global professional body for over 22,000 individuals and 300 organisations working, studying or interested in the environment and sustainability. We are the professional organisation at the centre of the sustainability agenda, connecting business and individuals across industries, sectors and borders.

We also help and support public and private sector organisations, governments and regulators to do the right thing when it comes to environment and sustainability related initiatives, challenges and opportunities.

We work to influence public policy on environment and sustainability matters. We do this by drawing on the insights and experience of our members to ensure that what happens in practice influences the development of government policy, legislation, regulations and standards.

EXECUTIVE SUMMARY

This consultation response from IEMA builds on our members' extensive engagement with planning reforms since 2020 and previous reviews of NSIP reforms, Environmental Outcome Reports (EORs), and the National Planning Policy Framework (NPPF).

While acknowledging some positive changes in the revised NPPF, IEMA remains concerned that proposed measures may not sufficiently safeguard the environment, particularly when balancing housing growth, infrastructure delivery, and economic development with long-term environmental quality and resilience.

IEMA's key recommendations are as follows:

Maintaining Robust Environmental Protections:

While the revisions to the NPPF highlight environmental improvement, more explicit and enforceable measures are needed. There is a risk that "streamlining" sustainable development presumption and reforms to EIA, SEA, and HRA (through EOR) could erode current safeguards, weaken local authorities' capacity to protect natural resources, and undermine the government's own environmental targets and obligations.

Integrating Environmental, Social, and Economic Factors Equally:

Sustainable development must not prioritize economic growth at the expense of environmental integrity or social well-being. The NPPF when combined with other planning reforms and policies should ensure that climate change considerations, biodiversity net gain (BNG), and the conservation of habitats and soils are given equal weight, encouraging place-based solutions that enhance green infrastructure, reduce carbon emissions, improve public health, and support cohesive communities.

Strengthening Strategic and Cross-Boundary Planning:

A return to regional strategic planning and better cross-boundary cooperation can guide sustainable land use choices. This should be supported by improved strategic environmental assessments and robust impact assessments (EIA, SEA, SA, HIA, HRA, EOR) led by competent experts, ensuring that planning decisions address complex environmental challenges and deliver genuinely sustainable outcomes.

Ensuring Transparency, Participation, and Accountability:

Public participation and stakeholder engagement must be enhanced, both in plan-making and within assessment processes (including EORs). Transparent methodologies, clear data, and accessible information—ideally supported by a national environmental assessment unit—are vital for building trust, enabling informed decision-making, and ensuring that development delivers meaningful benefits for nature and people.

Fostering Low-Carbon and Climate-Resilient Development:

To meet national carbon reduction targets, the NPPF when combined with other planning reforms and policies should include stronger mandates for low-carbon and climate-adaptive development. This entails setting clear standards, ensuring consistent, auditable approaches to carbon accounting, and aligning transport, infrastructure, and land use decisions to reduce emissions and bolster adaptive resilience to climate change.

Prioritizing Regeneration and Sustainable Locations:

Instead of punitive measures when housing targets are missed, planning should focus on reviving towns and cities, creating or refurbishing homes in well-connected areas, and revitalizing communities without relying on car-dependent sprawl. Such measures can deliver healthier urban environments, enhance public well-being, and strengthen local economies.

In summary, IEMA urges the government to focus the ongoing planning and policy reforms on maintaining strong environmental safeguards, ensuring effective impact assessment, and integrating climate, biodiversity, health, and social considerations into planning. A more strategic, evidence-based, and participatory approach is needed to realize genuinely sustainable development that secures environmental quality, public health, and long-term community resilience. IEMA would welcome the opportunity to feed into the emerging EOR reforms of environmental assessment.

IEMA WRITTEN EVIDENCE SUBMISSION

ENVIRONMENTAL SUSTAINABILITY AND HOUSING GROWTH

QUESTION 1: WHAT PROVISIONS WILL THE NATIONAL PLANNING POLICY FRAMEWORK, AS REVISED UNDER THE GOVERNMENT'S PROPOSALS, MAKE FOR PROTECTION AND ENHANCEMENT OF THE ENVIRONMENT? ARE THESE PROVISIONS LIKELY TO BE ADEQUATE?

We recognise the positive aspects of the NPPF changes, such as the aim to support clean energy and the environment, including promoting onshore wind and renewables. We also acknowledge and welcome the focus on delivering community needs to support society and create healthy places.

However, IEMA members have serious reservations about the adequacy of the NPPF's provisions, particularly regarding:

The reality of balancing housing growth with environmental protection: We are concerned about the potential for conflict between the government's focus on economic growth and housing targets with environmental protection, even though the spirit of the proposals is an integration of these. There is a need for very robust safeguards to ensure that plans for development alongside environmental quality come to fruition down the line after planning permission has been granted and construction is being planned/has begun. We advocate for a more integrated approach to planning, considering factors such as infrastructure capacity, environmental sensitivity, and community needs.

Clarity and strength of environmental safeguards: IEMA members want to see more robust and detailed guidance to support the NPPF to ensure that development doesn't undermine the functionality of Green Belt areas or lead to the degradation of high-performing Green Belt land. Strengthen the "golden rules" for Green Belt development to ensure genuinely sustainable outcomes.

Consideration of climate change: We call for a more explicit and ambitious approach to addressing climate change within the ongoing planning reforms. Incorporating advice from the Climate Change Committee, particularly regarding the reduction of embodied carbon in construction, is essential. There is a need for clear policies to promote low-carbon development, including energy-efficient, and climate change-resilient building standards and sustainable transport options.

Strategic planning and cross-boundary cooperation: We support regional strategic planning to ensure sustainable development through integrated decision-making. There is a need for effective cross-boundary cooperation to address strategic environmental issues that extend beyond local authority boundaries, and a consideration of areas defined by natural features and local needs, rather than by borough/county boundaries.

Importance of impact assessments and competent experts: There is a crucial role to be played by impact assessments in informing planning decisions and ensuring environmental protection. It is essential to maintain and strengthen requirements for Environmental Impact Assessments (EIA), Strategic Environmental Assessments (SEA), and Sustainability Appraisals (SA). There should be

mandatory involvement of competent experts in these assessments and the definition of a competent expert should be made clear.

Public participation: Meaningful, early, public participation is needed in the planning process to increase community buy-in and ease pushback, particularly from rural communities and action groups.

Enforcement: Robust enforcement mechanisms are needed to ensure that developments adhere to environmental standards and commitments.

QUESTION 2: WHAT POLICY LEVERS DOES THE GOVERNMENT PLAN TO USE TO ENSURE THAT LOCAL AUTHORITIES DELIVER THE DEVELOPMENT WHICH THE REVISED NPPF 'STANDARD METHOD' REQUIRES? DO THE GOVERNMENT PLANS RESULT IN LOCAL PLANNING AUTHORITIES BEING PENALISED IF DELIVERY FALLS SHORT? WHAT POLICY LEVERS WILL BE AVAILABLE TO LOCAL AUTHORITIES TO ENSURE THAT DEVELOPMENTS WHICH HAVE RECEIVED PLANNING APPROVAL ARE DELIVERED IN ACCORDANCE WITH CONSENTS?

Unsustainable approach to penalties: IEMA is concerned about the ramifications and potential consequences for local planning authorities if they fail to deliver the required targets or have plans in place. Whilst IEMA understand the desire to encourage Local Authorities to adopt plans and meet requirements, the penalty approach is unethical and unsustainable. The penalty of presumption for development has encouraged many ad hoc projects to come forward on unsustainable sites which have performed badly in the Local Plan Sustainability Appraisals and Strategic Environmental Assessments. Therefore, in these instances, the penalty actually falls on the environment and local communities, rather than the Local Authority, leading to unsustainable development contrary to the NPPF goals.

Increase resources: IEMA supports measures that will increase planning-related resources for Local Authorities. We welcome the addition of more resources for planning officers and the provision of more planning officers overall.

Improved enforcement: Robust enforcement mechanisms are essential to ensure compliance with planning conditions and mitigate against unauthorised development. Effective enforcement is crucial to upholding the integrity of the planning system and safeguarding environmental quality. There needs to be a review, and increased support (and resources), for mechanisms that local authorities can employ to guarantee developments adhere to planning consents.

QUESTION 3: TO WHAT EXTENT IS THE CURRENT PLANNING PRESUMPTION IN FAVOUR OF SUSTAINABLE DEVELOPMENT COMPATIBLE WITH THE ENVIRONMENTAL OBJECTIVE OF THE PLANNING SYSTEM? TO WHAT EXTENT WILL THE PROPOSED 'STREAMLINING' OF THE SUSTAINABLE DEVELOPMENT PRESUMPTION WORK TO DELIVER DEVELOPMENTS WHICH WILL MEET THIS OBJECTIVE AND BE COMPATIBLE WITH THE GOVERNMENT'S ENVIRONMENTAL TARGETS AND OBLIGATIONS?

The sustainable development presumption must not override environmental objectives. Clear safeguards and guidance are needed so developments truly deliver sustainable outcomes and meet environmental targets.

While the presumption can align with environmental goals if applied correctly, it is often misused to prioritize development at the expense of the environment. We are concerned that ‘streamlining’ this presumption without proper safeguards will weaken protections and lead to more unsustainable projects.

Key actions include:

- Articulating a clear, consistent definition of sustainable development, giving equal weight to environmental considerations alongside economic and social factors.
- Strengthening EIA, SEA, and SA (and EOR) requirements, ensuring they occur early and fully address all environmental impacts.
- Establishing effective monitoring, enforcement, and accountability measures, with adequate resources, to ensure developments meet their environmental commitments.
- Creating a National Environmental Assessment Unit to support local authorities, ensure consistency, and promote best practice in environmental assessment.

QUESTION 4: HOW WILL THE REVISED NPPF WORK TO DELIVER THE SOCIAL AND ENVIRONMENTAL OBJECTIVES OF THE PLANNING SYSTEM? TO WHAT EXTENT WILL IT PROMOTE OUTCOMES WHICH DELIVER SUSTAINABLE SOCIAL AND ENVIRONMENTAL BENEFITS TOGETHER, SUCH AS ACCESS TO ESSENTIAL AMENITIES, TO PUBLIC TRANSPORT AND TO ACTIVE TRAVEL ROUTES?

Environmental considerations must be fully integrated and given equal weight alongside economic and social factors. The newly revised NPPF needs to be paired with robust assessments, and effective monitoring to ensure that sustainability commitments are delivered, rather than merely aspired to. Specific concerns and recommendations:

Design Codes: There remains a need to integrate environmental performance, sustainable materials, energy efficiency, and biodiversity objectives into design codes to create healthier, more sustainable communities.

Cross-Boundary Cooperation: The NPPF needs to be supported by the adopting of strategic planning that addresses infrastructure, green space, and environmental impacts across administrative boundaries.

Green Belt Development: The new Green Belt and Grey Belt provision in the NPPF need to be supported by quality environmental assessments, (following good practice guidance such as IEMA and Lis GLVIA3), to ensure any Green Belt development is genuinely justified, minimizing harm and preserving environmental value.

Health and Well-Being: The NPPF needs to be paired with strengthened planning policies and assessments to promote health, tackle obesity, and foster well-being through better quality environments and amenities.

Transport and Active Travel: Planning reforms need to assist the move from “predict and provide” to a vision-led approach prioritizing public transport, walking, and cycling, reducing car dependency and enhancing liveability.

Essential Amenities and Social Infrastructure: The planning reforms need to ensure new developments have access to essential services—schools, healthcare, community spaces—to support sustainable and equitable growth.

Impact Assessment: EOR if brought forward needs to strengthen EIA, SEA, and SA requirements, ensuring they occur early and implement the mitigation hierarchy into decision making.

QUESTION 5: WHAT CONTRIBUTION CAN THE NPPF MAKE TO MEETING GOVERNMENT TARGETS FOR THE REDUCTION OF GREENHOUSE GAS EMISSIONS? WHAT ACCOUNT DOES THE NPPF TAKE OF ADVICE FROM THE CLIMATE CHANGE COMMITTEE ON REDUCING THE USE OF EMBODIED CARBON AS WELL AS OPERATIONAL CARBON IN THE BUILT ENVIRONMENT?

Mandatory national requirements for low-carbon development are needed to avoid delays and inconsistencies. Clear, enforceable climate mitigation and adaptation measures will accelerate delivery and help achieve national carbon targets. IEMA has the following recommendations for promoting low-carbon development:

Future Homes Standard: Introduce ambitious standards for both homes and non-domestic buildings, driving energy efficiency and reducing emissions. The new FHS should include the more ambitious specifications that were put forward before the consultation and have been demonstrated to be deliverable and viable. The new FHS should also include embodied carbon.

Transport Planning: Move from vague “vision-led” terminology to a concrete framework with clear criteria, integrating transport planning with health, accessibility, economic growth, safety, air quality, and environmental considerations.

Embodied Carbon and Carbon Accounting: A consistent, auditable carbon accounting methodology should cover both operational and embodied carbon. It should define scope, standard procedures, and increase capacity for trained professionals to deliver robust assessments.

Integrating Climate Change into Planning: Climate change should be embedded throughout planning. The NPPF, together with ongoing planning and policy reforms, should mandate low-carbon development and provide clear, enforceable low-carbon requirements. While the NPPF does seek to prevent extensions and new peat extraction sites, the NPPF did not go far enough to seek to protect carbon-rich soils by considering soil carbon as part of land use decisions with the aim to minimize carbon release. This area will need to be strengthened as part of the ongoing planning and policy reforms.

Clarity and Certainty: Clear, consistent policies and procedures enable effective decision-making, efficient implementation, and better alignment with national carbon budgets and environmental targets.

The recent update was an opportunity to strengthen the NPPF with mandatory low-carbon requirements. . A more robust embodied carbon accounting framework, and deeper climate

integration will better support government emissions reduction goals. However, this has not been achieved in the NPPF and will need to be brought forward through the ongoing planning and policy reforms, such as with a revised and more ambitious Future Homes Standard.

QUESTION 6: WILL THE GOVERNMENT'S PROPOSALS AFFECT THE ABILITY OF LOCAL AUTHORITIES TO IMPLEMENT POLICIES DESIGNED TO PROTECT THE NATURAL ENVIRONMENT IN THEIR AREAS?

The proposed changes risk weakening local environmental safeguards by prioritizing national targets and streamlined processes over place-based policies. Reliance on Environmental Outcome Reports (EORs) may encourage a one-size-fits-all approach, reducing local authorities' ability to address unique environmental contexts and potentially lowering the rigor of environmental assessments compared to current EIA and SEA processes. Also, nature is very specific e.g. brownfield sites may have more biodiversity than the green or grey belt.

In addition, IEMA has the following concerns and recommendations:

Green Belt and "Grey Belt": Introducing "Grey Belt" areas could erode critical green spaces including nature corridors, harming biodiversity, climate resilience, and community well-being.

Biodiversity Net Gain (BNG): While we support BNG, clearer guidance, monitoring, and enforcement are needed to ensure genuine habitat improvements rather than simple offsets.

Climate Change Mitigation and Adaptation: Stronger policies are needed to promote low-carbon development, nature-based solutions, renewables, and community resilience to the impacts of climate change, such as heatwaves and periods of water stress or excess.

Water Infrastructure: Water resource planning must integrate ecosystem and biodiversity considerations.

Competent Experts: Mandate skilled professionals in developing and reviewing EORs to improve assessment quality.

National Environmental Assessment Unit: Establish a national body to provide guidance, oversight, and support, ensuring consistency and best practices.

Robust Monitoring and Enforcement: Strengthen mechanisms and resources to ensure that environmental commitments made at the planning stage are fully delivered.

QUESTION 7: WHAT (IF ANY) TRENDS ARE OBSERVABLE IN (A) DELIVERY OF ENVIRONMENTAL IMPROVEMENTS (B) THE PURCHASE AND TRADING OF CREDITS ARISING FROM THE ENVIRONMENTAL ACT REQUIREMENT FOR DEVELOPMENTS TO YIELD BIODIVERSITY NET GAIN (BNG)? HOW ARE THE PLANNING AUTHORITIES USING BNG IN THE PLANNING PROCESS TO DELIVER ENVIRONMENTAL IMPROVEMENTS FROM HOUSING DEVELOPMENT?

IEMA calls for transparent monitoring and reporting of Biodiversity Net Gain (BNG) credits—covering their generation, trade, and retirement—to ensure ecological quality and viability over the

required 30 years. Mechanisms should guarantee genuine, additional biodiversity benefits rather than low-quality offsets.

In addition, IEMA recommends that Planning authorities should deploy BNG to:

Prioritise On-Site Enhancement: Encourage developers to maximise habitat improvements on-site before resorting to off-site solutions.

Improve Connectivity and Functionality: Ensure BNG supports robust ecological networks rather than isolated habitat offsets.

Adopt a Holistic Approach: Align BNG with broader environmental goals, including climate resilience, water management, and healthy community development.

Foster Transparency and Participation: Make BNG plans accessible to the public and allow meaningful community input into their design and implementation.

QUESTION 8: HOW WILL THE REVISED NPPF OPERATE TO PROMOTE THE NATURE RECOVERY NETWORK AND THE IMPLEMENTATION OF LOCAL NATURE RECOVERY STRATEGIES BY RESPONSIBLE AUTHORITIES?

IEMA advocates a strategic, landscape-scale approach to planning that integrates Local Nature Recovery Strategies (LNRS) into development decisions. This ensures each project supports broader environmental objectives, including nature recovery and a coherent network of habitats. Local plans should include explicit policies requiring integration of LNRS into proposals, aligning development with local biodiversity priorities.

Collaboration between authorities and stakeholders should extend beyond administrative boundaries to address wider ecosystem needs. LNRS should guide decisions on Green Belt and “Grey Belt” development, ensuring that any such projects deliver meaningful biodiversity gains and contribute to the Nature Recovery Network (NRN).

Robust BNG implementation is also essential. BNG must integrate with LNRS to form functional ecological networks rather than isolated offsets. This holistic approach ensures development contributes to genuine, lasting biodiversity improvements.

QUESTION 9: WHAT USE CAN PLANNING AUTHORITIES MAKE OF THE DATA ANALYSIS AND MODELLING BEING DEVELOPED UNDER THE NATIONAL LAND DATA FRAMEWORK TO SUPPORT PLANNING DECISIONS WHICH LEAD TO BETTER ENVIRONMENTAL OUTCOMES? HOW SHOULD THE NPPF BE INTEGRATED INTO THE FORTHCOMING LAND USE FRAMEWORK?

The Land Use Framework should clearly link to national environmental targets and commitments, supporting coordinated regional planning and ensuring the NPPF’s policies work together toward genuinely sustainable outcomes. This includes integrating biodiversity net gain, enhancing green infrastructure, and mitigating climate change.

Public engagement and transparency are vital. The NPPF and Land Use Framework should be developed openly, allowing communities and stakeholders to shape decisions. The National Land Use Data Programme (NLDP) can bolster transparency, provide accessible data, and help identify cross-boundary opportunities for collaboration.

Robust evidence and data should inform planning decisions, with the NLDP supporting the identification of high-value or sensitive areas and assessing the potential impacts of different land use scenarios. However, NLDP data must complement, not replace, established impact assessments like EIA and SEA, which provide critical public engagement, data collection, and impact avoidance measures essential for sustainable development.

QUESTION 10: WHAT ENVIRONMENTAL REGULATORY ARRANGEMENTS WITHIN DEFRA'S REMIT WHICH RELATE TO THE PLANNING PROCESS ARE LIKELY TO BE UNDER REVIEW AS POTENTIAL INHIBITORS OF GROWTH? WHAT EFFECT ON ENVIRONMENTAL PROTECTIONS WOULD REFORM OF THESE REGULATIONS BE LIKELY TO HAVE?

IEMA supports sustainable economic growth that does not compromise environmental protection. Any regulatory reforms must maintain strong safeguards and avoid unintended harm to ecosystems, biodiversity, and public health.

Habitat Regulations Assessment (HRA): HRA protects critical habitats and species. Weakening it could undermine biodiversity and efforts to meet environmental targets.

Environmental Impact Assessment (EIA) and Strategic environmental Assessment (SEA): EIA and SEA are vital for identifying and mitigating impacts of major developments, plans and programmes. Improvements should focus on quality, proportionality, and competent expertise, not simply reducing requirements or rushing approvals.

Water Framework Directive (WFD): Maintaining or enhancing WFD standards ensures sustainable water management and good ecological status. Lowering these standards risks increased pollution and water scarcity.

Air Quality Regulations: Robust air quality standards protect human health and ecosystems. Relaxing these rules could worsen pollution and public health outcomes.

Environmental regulations protect long-term sustainability. Reforms must be evidence-based, well-implemented, and enforced, with stakeholders—including environmental professionals—actively engaged to preserve these critical safeguards.

For comments or questions relating to IEMA's Response please contact:

Dr Rufus A. Howard CEnv FIEMA
Policy Lead - Impact Assessment, IEMA.
ia@iema.net