



## Proposed reforms to the National Planning Policy Framework and other changes to the planning system

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### Question 78

#### In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?

This review is a timely opportunity to remedy the shortcomings in the current planning framework and ensure that policymakers at national and local level are provided with the tools to **make planning fit for net zero** in a way that is consistent with overarching climate goals as well as important public health objectives.

Planning policy can and must play a central role in addressing climate change mitigation and adaptation and transitioning to a low-emissions economy, specifically by **making climate change a material planning consideration** across all types of development, including **intensive livestock units**. It is key that high-emissions developments such as industrial livestock units be **subject to enhanced requirements and stricter planning rules** in order to safeguard the climate, biodiversity and public health.

#### Background:

Livestock production generates significant greenhouse gas emissions and other undesirable impacts, emitting dangerous levels of pollution to water, air and soils. However, the current planning policy framework offers **inadequate safeguards against the proliferation of high-emissions livestock units**.

According to Defra, agriculture is responsible for 12% of the UK's greenhouse gas (GHG) emissions (48 Mt CO<sub>2</sub>e). Whilst agriculture has reduced GHG emissions by 12% since 1990, it now accounts for a **larger proportion of the UK total** as other sectors have decarbonised faster [[Defra, 2024](#)].

Agriculture was responsible for 87% of UK emissions of ammonia in 2022, mainly from livestock farming and fertiliser use. Agriculturally-produced ammonia generated **£2.19 bn in costs to human health and the environment** in the UK in 2022 [[Defra, 2024](#)].

Industrial livestock farming produces more than 50,000 tonnes of untreated excreta per day; every region in the UK now has more nitrogen than it can absorb [[Sustain, 2023](#)]. 40% of waterbodies in England are impacted by pollution from agriculture and rural areas. Water quality can be adversely affected by farming through run-off of fertilisers, pesticides and slurry and through erosion of soil, which is washed off farmland. Farming accounts for 25% phosphate, 50% nitrate and 75% sediment loadings in the UK water environment [[Defra, 2024](#)].

The impacts on nature and wildlife can be catastrophic: for example, conservation groups report that wildlife is in freefall and the River Wye faces “irreversible damage” as a result of

intensive agriculture in the Wye Valley in Herefordshire [[Herefordshire Wildlife Trust, 2023](#)]. A 2023 report found that the **UK is one of the most nature-depleted countries in the world** [[State of Nature Partnership, 2023](#)].

The UK has made a commitment to reduce greenhouse gas emissions by 68% by 2030, as part of a legally binding target to reach net zero by 2050 [[Climate Action Tracker, 2023](#)]. Urgently restricting and reversing the growth of the UK's industrial livestock sector is **essential for the UK to meet its climate targets**. The Climate Change Committee, an independent, statutory body set up to advise the UK government on emissions targets, recommends **at least a 20% shift away from beef, lamb and dairy to alternative protein sources per person by 2050, while a more ambitious reduction of 50% may be needed, depending on progress in other sectors** ([CCC, 2020](#)).

The need to control livestock-related emissions has become more urgent than ever, because the world recently breached the 1.5°C degrees warming limit for an entire year for the first time [[BBC, 2024](#)]. Global livestock emissions need to peak by 2025 and be reduced by 61% by 2036, with **faster and deeper reductions in higher-income countries**, in order to limit global warming in line with the Paris agreement. UK meat consumption is nearly double the global average [[OECD, 2023](#)]. If every country in the world adopted the **UK's high-meat diet**, global land use by agriculture would have to nearly double [[Our World in Data, 2017](#)], causing catastrophic habitat destruction. Conversely, reduction in meat consumption could result in significant nature restoration. [see: [Feedback, 2024](#)]

Switching away from intensive livestock production towards nature-based farming is widely accepted as a desirable public policy objective, including by the farming community [see: [TFA, 2022](#)]. Planning policy reform can help accelerate a transformation in (agricultural) land use across the UK, such that it enhances public health and biodiversity while combating climate change.

Paragraph 88 of the NPPF states that planning policies and decisions should enable:

*a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;*

*b) the development and diversification of agricultural and other land-based rural businesses;*

In reality, growth has been anything but sustainable, and this guidance has opened the door to increasing concentration within the British farming sector and the rapid proliferation of polluting **US-style "megafarms"** [[The Guardian, 2022](#)]. Over 1,000 of these now supply meat and dairy to supermarkets nationwide, with **more in the planning pipeline**. At the same time, thousands of smaller-scale units have closed down: 110,000 livestock and poultry farms went out of business in the UK between 1990 and 2016, a 34% decline [[The Guardian, 2021](#)]. Compassion in World Farming calculates that in the UK, 85% of farmed animals are kept in factory farms at a great cost to animal welfare, human health and the environment [[Compassion in World Farming, 2021](#)].

Paragraph 88 should therefore be edited to say:

*Planning policies and decisions should enable:*

*"The sustainable growth and expansion of enterprises in rural areas, where they contribute to sustainable development goals and align with the UK Government's commitments around tackling global warming. Developments that support agroecology should be supported."*

In addition, the NPPF should adopt the recommendations of the [Environmental Audit Committee](#) to address water pollution:

*“There should be a presumption against granting planning permission for new intensive livestock units in catchments where the proposed development would exceed the catchment’s nutrient budget”*

The presumption against granting planning permission should apply in all catchments where nitrogen budgets are exceeded, i.e. even where developers present mitigation or pollution reduction plans. The government has clear targets to reduce nutrient pollution. Such mitigation measures are insufficient to achieve these goals. Additionally, the resources required to monitor and enforce such measures and thus ensure they don’t lead to increased pollution over the lifetime of the project are unrealistic, given resource pressures on the Environment Agency and Local Authorities.

The UK’s industrial livestock industry (particularly pigs and poultry) is heavily dependent on imported soy, which is destroying critical biomes in e.g. the Amazon and resulting in imported deforestation and climate change.

Recent modelling has shown that reducing industrial meat production and replacing soy in UK pig and poultry feed with unavoidable food waste would benefit small and medium-scale pig, poultry and legume farmers to build resilient and thriving farming businesses which focus on the production of higher quality and more ethically produced meat ([Landworkers Alliance et. al., 2023](#)).

## Question 79

**What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?**

It is our view that greenhouse gas (GHG) assessments should be made mandatory for all developments, including livestock units. The recent ‘Finch’ court ruling has highlighted that [Council planning teams must fully consider greenhouse gas emissions](#) - both ‘direct’ and ‘indirect’ - when making planning decisions, and planning policy must reflect this.

GHG assessments must be:

- Comprehensive, in that they must include all greenhouse gases (CO<sub>2</sub>, methane, nitrous oxide etc.) and factor in both direct and indirect emissions;
- Delivered in an accessible format which makes it easy for policymakers and other stakeholders, including the general public, to understand the environmental impact of proposed developments. This is important for democratic decision-making and good governance.