



Link response to National Planning Policy Framework (NPPF) consultation

24 September 2024

This consultation response is on behalf of nature coalition Wildlife and Countryside Link.

Covering letter

The dual climate and nature crises threaten our natural environment, economy and society. The Government has a strong mandate for clean energy and affordable housing. It also has a clear mandate for nature, including domestic and international commitments to halt the decline of wildlife, improve water quality, and effectively protect 30% of the country for nature by 2030. Achieving these objectives will require significant land use change. We need more, and higher quality space for nature – requiring habitat creation and restoration of [at least 1.5 million hectares by 2030](#). Renewable energy needs to be deployed at scale and with speed so that the [majority of our power comes from wind and solar energy by 2030](#).

These climate and nature solutions can be mutually beneficial, if planned and implemented well. Restoring nature will help mitigate climate change and adapt to its effects, as habitats sequester and store carbon and improve resilience. Climate change is one of the biggest drivers of biodiversity decline, so mitigating carbon emissions is crucial for wildlife. On the other hand, poor planning can set nature and climate action at odds.

The planning system should be a key mechanism for ensuring nature and climate targets are met, as well as other important objectives for land use, such as housing, and for managing any tensions that arise. Currently, however, the planning system is not working well in meeting these objectives.

The planning system [must plan actively for nature recovery](#), beyond its current design to minimise harm to nature. Any planning reform intended to increase the scale and pace of sustainable development [must be paired with an equally ambitious plan](#) to increase the scale and pace of “natural infrastructure” restoration and creation. New places and communities must have nature, climate, and the health and wellbeing of people at their heart.



This draft NPPF for consultation does not achieve this. The rhetoric from the Government and in this consultation document, including some of the open questions, around the importance of tackling the nature and climate crises is welcome, however, there are no proposals in the draft NPPF or in the consultation document that will increase the protection or restoration of habitats and wildlife across the country and in new developments.

To deliver renewable energy and nature restoration at scale, at pace and in unison, as well as the Government's objectives on housebuilding, we recommend:

1. Investing in restoring and managing natural and semi-natural habitats, including protected sites, so that ecosystems are in better condition, climate resilient and well-connected.

The Government should require local planning authorities to set local habitat restoration targets alongside housing targets in their local development plans, in line with the Local Nature Recovery Strategy (LNRS), to help local authorities drive nature restoration efforts forward.

Important natural habitats need stronger protection in national planning policy. Local Wildlife Sites should be given stronger and more specified protection in the NPPF.

Irreplaceable habitats, some of which are specified in the NPPF and therefore receive some planning policy protection, such as ancient woodlands, need to be better recognised through a better definition and list. There are more rare and special habitats which cannot be replaced or would take so long to reestablish that they are virtually irreplaceable, such as ancient hedgerows, rivers, lakes, ponds, chalk streams, long-established woodland, traditional orchards, and priority grasslands such as floodplain meadows. The Government should follow through as soon as possible on its commitment to consult on and introduce a definition and expanded and more accurate list of irreplaceable habitats.

2. Introducing integrated national and local spatial strategic planning, with stronger protection and proactive planning for nature and better environmental information, to optimise use of space on land and ensure development is in the right place.

The Government should publish a strategic National Spatial Plan for England, which sets out how the Government plans to achieve its environmental ambitions, including



the commitment to protect 30% of land (including inland waters) for nature by 2030, the target to halt the decline of species abundance by 2030, and other land use objectives. National strategic planning must be joined up with regional planning, such as Catchment Management Plans, with local planning, including Local Nature Recovery Strategies (LNRSs) and local development plans, and with sea use planning in the marine environment where appropriate.

Proposals for Spatial Development Strategies must embed nature and climate considerations at their heart, alongside economic and social considerations.

Crucially, strategic planning must be supported by quality and timely environmental data and resources and expertise, especially in terrestrial and aquatic ecology, for local planning authorities. This is essential to ensure that sites are subject to appropriate ecological assessment to ensure that development is steered away from sites of ecological significance or high biodiversity value, regardless of land classification such as brownfield.

3. Ensuring development is green by design, including by mandating nature-friendly development and improving and expanding Biodiversity Net Gain (BNG), to boost biodiversity as well as climate resilience and the health and wellbeing of communities.

The Government should require all new development to meet [nature-friendly design standards](#), including swift bricks and bee bricks, green and brown roofs, appropriately designed and located bat roost features with supporting habitats and sensitive lighting strategies, and fish passes where development impacts river channels. The Government should make sustainable drainage systems (SuDS) mandatory for all new developments by implementing Schedule 3 of the Flood and Water Management Act.

The Government should [close loopholes in the current Biodiversity Net Gain policy](#) and consult on and implement the expansion of BNG to major infrastructure projects.

The proposed 'golden rules' for new development in released Green Belt land should be applied to *all* new development. This should include making the access to nature standards set out in the proposed 'golden rules', in line with Natural England's Green Infrastructure Standards, compulsory for all local plans and new developments.



Responses to selected consultation questions

Chapter 3 – Planning for the homes we need

Question 4: Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130? [[Para 130](#) to be deleted reads: ‘In applying paragraphs 129a and b above to existing urban areas, significant uplifts in the average density of residential development may be inappropriate if the resulting built form would be wholly out of character with the existing area. Such circumstances should be evidenced through an authority-wide design code which is adopted or will be adopted as part of the development plan.’]

We support the principle of building the right homes in the right places, and in some cases, this could include densification of existing residential developments. However, when making policies or decisions that would result in the uplift of the average density of residential development, local planning authorities should take into account the impact of increased density on the local natural and historic environment, including impacts on protected sites, protected species, important wildlife and habitats, and local green and blue infrastructure. The overall environmental limits of the area, including additional pressures and footfall in important and potentially fragile local natural spaces also need to be considered.

The Government should add detail to new Para 127 in the NPPF to clarify that natural and historic environmental considerations must be factored into policy-making and decision-making on the density of development.

Question 5: Do you agree that the focus of design codes should move towards supporting spatial visions in local plans and areas that provide the greatest opportunities for change such as greater density, in particular the development of large new communities?

We support the principle of building the right homes in the right places, and in some cases, this could include densification of existing residential developments. However, when making policies or decisions that would result in the uplift of the average density of residential development, local planning authorities should take into account the impact of increased density on the local natural and historic environment, including impacts on protected sites and important wildlife and habitats, local green and blue infrastructure, and the overall



environmental limits of the area, including additional pressures and footfall in important and potentially fragile local natural spaces.

We support the development of localised design codes by local planning authorities, especially in areas where there is, or is potential for, significant uplift in residential density, but these must ensure that the natural and historic environment, including species, is properly taken into account.

This proposal should also not restrict design coding only to areas with the greatest opportunities for change – it is important to maintain and raise standards everywhere.

Question 6: Do you agree that the presumption in favour of sustainable development should be amended as proposed? [re land supply in Para 11 of the [draft NPPF](#)]

Overall, we are concerned that the changes to Paragraph 11 and to Footnote 9 which strengthens the presumption in favour of (potentially unsustainable) development and shifts the balance of the NPPF away from considering the three pillars of sustainable development (economic, social and environmental) in an integrated and holistic way. A blanket presumption in favour of sustainable development can prevent developments from being appropriately considered for their impacts on nature on a case-by-case basis.

We welcome the inclusion of explicit reference to the need to consider locational and design policies when applying the presumption in favour of sustainable development, however, to ensure nature is part of this decision-making, proposed amendments to Paragraph 11d(ii) should make specific reference to Chapter 15 of the NPPF, as well as Chapters 9 and 12.

In addition, Local Wildlife Sites should be added to the list of sites in Footnote 7, referred to in Paragraph 11 of the NPPF. Local Wildlife Sites are identified on a scientific basis for their substantive nature conservation value, covering the most important and threatened species and habitats in the local, regional and national context. Because all areas that meet the criteria are selected as Local Wildlife Sites, rather than the representative sample of habitats and species designated as Sites of Special Scientific Interest (SSSI), many Local Wildlife Sites can be of equal or higher biodiversity value than SSSIs. Thus it is essential that the important biodiversity and natural capital assets that Local Wildlife Sites support be recognised and protected by Local Wildlife Sites being included in the list of important habitat sites in Footnote 7 of the NPPF.



Question 12: Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters? [see Paras 24-27 of the [draft NPPF](#)]

Yes, we support the amendments to NPPF Paragraphs 24 and 27 strengthening cross-boundary cooperation and effective strategic planning across local planning authority boundaries.

Ecosystems and natural and historic landscapes extend beyond LPA boundaries. Currently the land use planning system does not effectively address issues at an ecosystems or landscape-scale, such as river basins and catchments or ecological corridors. For example, tackling frequent flooding in the Ouse Washes which is posing a threat to wildlife and people requires changes to land use upstream. This also applies to water quality issues where pollution in one area can cause nutrient overloads in a different area downstream. For many species, including pollinators such as bees, and mobile species such as Atlantic salmon, recovering their declining populations requires the creation and connecting up of green and blue habitat corridors across and between LPA boundaries.

Thus, we are very supportive of strategic planning approaches which encourage and support the development of planning at a larger-than-local level to help deliver a wider range of environmental, as well as social and economic benefits, from planning.

Strategic planning must, where relevant, include National Park Authorities, given their role as local planning authorities, and include the local planning authorities responsible for National Landscapes.

We welcome the reference in Paragraph 27a to environmental improvement and resilience. We think this could be strengthened by an additional and specific reference to 'green and blue infrastructure', in order to recognise the importance of natural infrastructure, alongside other built infrastructure.

To ensure cross-boundary and strategic planning approaches specifically consider the natural environment, Paragraph 24 should also specifically reference 'ecological resilience' or 'environmental resilience,' alongside economic and climate resilience.

The amendments proposed in the NPPF are a step in the right direction but there does need to be a recognition that there will still be limitations in its effectiveness, until wider strategic plans are brought forward in legislation.



We also welcome the proposed introduction of universal coverage of strategic planning, however this approach must include environmental considerations and must include environmental expertise in their development. With limited land in England and a range of differing demands on land, from nature recovery, climate adaptation, housing, food production, water management, transport infrastructure, renewables infrastructure, and recreation, an approach to strategic planning that does not work across land uses will lead to various demands clashing or not being delivered. We look forward to working with the Government as they consult on, develop and test this new strategic planning approach.

There are other existing and emerging plans, such as Local Nature Recovery Strategies (LNRs) and river basin and Catchment Management Plans, and other proposed mechanisms, such as the Land Use Framework, Strategic Spatial Energy Plan (SSEP) and other strategic spatial plans for infrastructure, which should be integrated into the Government's approach to universal coverage of strategic planning.

As the consultation document recognises, LNRs are important existing and emerging documents. Currently, however, they do not have a connection to delivery mechanisms such as Biodiversity Net Gain (BNG) and Environmental Land Management (ELM) schemes and only a very weak link to land use planning (a duty in the Levelling Up and Regeneration Act to be 'taken account of' in local development plans). The Government can strengthen delivery of LNRs and strategic planning for nature and people by embedding the LNRs' local habitat restoration targets into local development plans and requiring the inclusion of policies to achieve those targets.

We are also advocating for a Land Use Framework that is an overarching, England-wide spatial document which identifies where and how different land uses can be aligned to maximize co-benefits and ensure that national environmental targets, and other national targets with land use needs or implications, are met. To be effective, the Land Use Framework must also be target and outcome-driven (for example, having the achievement of net zero by 2050 and the pledge to protect at least 30% of land for nature at its heart), backed by strong implementation including through planning policies and decisions and consenting and spending decisions, and be transparent and adaptable for delivery.

The suite of National Policy Statements underpinning the major infrastructure consenting system should have a new spatial focus. Energy infrastructure should be brought forwards in line with a Strategic Spatial Energy Plan (SSEP), underpinned by a robust Strategic Environmental Assessment (SEA) and plan-level HRA (Habitats Regulations Assessment), and in a nature positive way, with nature recovery one of the SSEP core objectives.



Strategic spatial planning should go beyond the Land Use Framework and spatial approaches to strategic energy planning. Both documents, alongside other strategic approaches such as river basin and catchment planning, should be brought together to produce a National Spatial Plan, a single coherent framework for land use and placemaking, giving clarity and confidence to everyone involved in the planning system. This National Spatial Plan should be target driven, backed by strong implementation duties and adaptable, as set out above.

Strategic spatial planning can help identify issues, but there must also be mechanisms and policies to support addressing those issues. For example, some new agricultural developments must receive planning permission, as well as an environmental permit, in order to operate. By bringing together catchment planning and land use planning (Catchment Nutrient Balancing Approach), the Land Use Framework or National Spatial Plan can help identify where the nutrient budgets in a particular catchment are being exceeded, causing freshwater pollution or air pollution. The Government should specify in the NPPF that no new intensive livestock units in areas where environmental limits have been breached should be granted. The Environmental Audit Committee [also recommended this approach](#) in 2022.

Question 13: Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals? [Context: Strategic plans, with implementation over a long period of time, can make it more difficult to provide evidence of deliverability and viability-how to enable long-term planning while recognizing that plans need to be grounded and realistic?]

Yes, we support the ambition that the planning system should enable planning at a strategic scale over the long-term.

Question 14: Do you have any other suggestions relating to the proposals in this chapter? [Chapter 3 on Planning for the homes we need]

Ecosystems and natural and historic landscapes extend beyond Local Planning Authority (LPA) boundaries. Currently the land use planning system does not effectively address issues at an ecosystems or landscape-scale, such as river basins and catchments or ecological corridors. For example, tackling frequent flooding in the Ouse Washes which is posing a threat to wildlife and people requires changes to land use upstream. This also applies to water quality issues where pollution in one area can cause nutrient overloads in a different area downstream. For many species, including pollinators such as bees, and mobile species such as Atlantic salmon,



recovering their declining populations requires the creation and connecting up of green and blue habitat corridors across and between LPA boundaries.

With limited land in England and a range of differing demands on land, from nature recovery, climate adaptation, housing, food production, water management, transport infrastructure, renewables infrastructure, and recreation, an approach to strategic planning that does not work across land uses will lead to various demands clashing or not being delivered.

Thus, we are very supportive of strategic planning approaches which encourage and support the development of planning at a larger-than-local level to help deliver a wider range of environmental, as well as social and economic benefits, from planning. In order to do so, strategic planning must include environmental considerations and must include environmental expertise in their development.

Strategic planning must, where relevant, include National Park Authorities, given their role as local planning authorities, and include the local planning authorities responsible for National Landscapes.

There are other existing and emerging plans, such as Local Nature Recovery Strategies (LNRSs), Catchment Management Plans, and other proposed mechanisms, such as the Land Use Framework, Strategic Spatial Energy Plan (SSEP) and other strategic spatial plans for infrastructure, which should be integrated into the Government's approach to universal coverage of strategic planning.

As the consultation document recognises, LNRSs are important existing and emerging documents. Currently, however, they do not have a connection to delivery mechanisms such as Biodiversity Net Gain (BNG) and Environmental Land Management (ELM) schemes and only a very weak link to land use planning (a duty in the Levelling Up and Regeneration Act to be 'taken account of' in local development plans). The Government can strengthen delivery of LNRSs and strategic planning for nature and people by embedding the LNRSs' local habitat restoration targets into local development plans and requiring the inclusion of policies to achieve those targets.

We are also advocating for a Land Use Framework that is an overarching, England-wide spatial document which identifies where and how different land uses can be aligned to maximize co-benefits and ensure that national environmental targets, and other national targets with land use needs or implications, are met. To be effective, the Land Use Framework must also be target and outcome-driven (for example, having the achievement of net zero by 2050 and the



pledge to protect at least 30% of land for nature at its heart), backed by strong implementation including through planning policies and decisions and consenting and spending decisions, and be transparent and adaptable for delivery.

The suite of National Policy Statements underpinning the major infrastructure consenting system should also have a new spatial focus. Energy infrastructure should be brought forwards in line with a Strategic Spatial Energy Plan (SSEP), underpinned by a robust Strategic Environmental Assessment (SEA) and plan-level HRA (Habitats Regulations Assessment), and in a nature positive way, with nature recovery one of the SSEP core objectives.

Strategic spatial planning should go beyond the Land Use Framework and spatial approaches to strategic energy planning. Both documents, alongside other strategic approaches such as catchment planning, should be brought together to produce a National Spatial Plan, a single coherent framework for land use and placemaking, giving clarity and confidence to everyone involved in the planning system. This National Spatial Plan should be target driven, backed by strong implementation duties and adaptable, as set out above.

Strategic spatial planning can help identify issues, but there must also be mechanisms and policies to support addressing those issues. For example, some new agricultural developments must receive planning permission, as well as an environmental permit, in order to operate. By bringing together catchment planning and land use planning, the Land Use Framework or National Spatial Plan can help identify where the nutrient budgets in a particular catchment are being exceeded, causing freshwater pollution or air pollution. The Government should specify in the NPPF that no new intensive livestock units in areas where environmental limits have been breached should be granted. The Environmental Audit Committee [also recommended this approach](#) in 2022.

Chapter 5 – Brownfield, grey belt and the Green Belt

Question 20: Do you agree that we should make the proposed change set out in [paragraph 124c](#), as a first step towards brownfield passports? [Giving ‘acceptability in principle’ to proposals using suitable brownfield land]

No, we do not agree with the proposed change in Paragraph 124C to give acceptability in principle in planning policies and decisions to proposals for homes and other identified needs on suitable brownfield land.



Brownfield sites range from hard-standing areas of limited biodiversity value through to some [nationally important wildlife sites, including Priority Habitat Open Mosaic Habitat on Previously Developed Land \(OMHPDL\)](#), and sites which support some of the UK's most scarce and threatened species, for example, the Swanscombe Peninsula Site of Special Scientific Interest (SSSI). Ancient and veteran trees can be found anywhere within the landscape, including on brownfield sites. In addition, brownfield sites can provide the last 'wild green and blue space' in urban areas for local communities, allowing them access to nature consequently improving the communities' health and wellbeing.

We agree in principle that many brownfield sites are suitable for development and that national policy could go further in promoting development on suitable brownfield land in order to reduce pressure on greenfield sites, but a blanket principle in favour of development risks sites of high environmental value being lost.

Sites should be assessed for their value and potential value for biodiversity and local communities on a case-by-case basis and not based on land classification. Other factors will also need to be considered in order to determine whether brownfield land is a suitable location for homes or other identified needs, including whether it is a sustainable location from climate, transport, and economic points of view, or whether there are other potential more beneficial uses of particular brownfield sites, for example by providing local access to nature in urban areas which might lack good access to green and blue spaces. Adding 'acceptability in principle' to planning policies and decisions reduces or removes the opportunity for the decision-maker to weigh environmental and other considerations in the planning balance.

Overall, in our view, the NPPF already gives significant weight to the delivery of housing through the presumption for sustainable development and brownfield-first is not a new concept, and is already exercised in practice in most local plans. There is no evidence that failure to identify brownfield sites suitable for development is a blocker to development. These proposed changes only shift the balance of the NPPF further away from considering the three pillars of sustainable development (economic, social, environmental) on brownfield sites in an integrated and holistic way.

If the Government proceeds with this approach, national policy must clearly distinguish between suitable sites for development and brownfield sites of high environmental value and public access to nature value. Paragraph 124c should specify that brownfield land of high environmental value is not suitable brownfield land for development and include a definition in the NPPF of 'high environmental value.' This policy must be supported by greater clarity for



planners and developers through guidance about what are considered brownfield sites with environmental value for nature and people, including guidance on recognising OMHPDL. It must be accompanied by more funding for ecological expertise, especially within local planning authorities, to support appropriate ecological surveys and assessment.

In addition, the consultation document mentions brownfield passports, but these are not defined or discussed in detail. We would welcome clarification about brownfield passports and whether these are intended to be a policy mechanism.

Question 21: Do you agree with the proposed change to [paragraph 154g](#) of the current NPPF to better support the development of PDL in the Green Belt? [Adding limited infilling to previously developed land which 'would not cause substantial harm to the openness of the Green Belt' as an exception for development on Green Belt]

Sites should be assessed for their value and potential value for biodiversity and local communities on a case-by-case basis and not based on land classification, such as 'previously developed land.' Other factors will also need to be considered in order to determine whether brownfield land is a suitable location for homes or other identified needs, including whether it is a sustainable location from climate, transport, and economic points of view, or whether there are other potential more beneficial uses of particular brownfield site, for example for providing local access to nature in urban areas which might lack good access to green and blue spaces or providing nature conservation to retain existing habitats or connect up habitat fragments to enable the movement of species across a landscape.

Overall, in our view, the NPPF already gives significant weight to the delivery of housing through the presumption for sustainable development and brownfield-first is not a new concept, and is already exercised in practice in most local plans. There is no evidence that failure to identify previously developed land or brownfield sites suitable for development is a blocker to development. These proposed changes only shift the balance of the NPPF further away from considering the three pillars of sustainable development (economic, social, environmental) on previously developed land in an integrated and holistic way.



Question 22: Do you have any views on expanding the definition of PDL [to include hardstanding and glasshouses], while ensuring that the development and maintenance of glasshouses for horticultural production is maintained?

We do not agree it would be beneficial to expand the definition of previously developed land (PDL) to include hardstanding and glasshouses. Many of these sites are by nature rural locations, generally single storey structures, and therefore they can still provide a sense of openness. In addition, including hardstanding within the PDL definition could lead to an incentive to deliberately degrade land in order to qualify for PDL or grey belt status.

Glasshouses can also be located in less sustainable locations that may not be suitable for development. There is a value in glasshouses being retained for horticulture or other rural-based enterprises.

Hardstanding associated with the existing or previous use of site, for example petrol stations or other urban land uses such as industrial estates, could be included in the definition of PDL on the basis of making more effective use of land that has more of an urban built form.

Question 23: Do you agree with our proposed definition of grey belt land [to add to the NPPF glossary]? If not, what changes would you recommend? [Proposed definition of Grey belt: 'For the purposes of Plan-making and decision-making, grey belt is defined as land in the Green Belt comprising Previously Developed Land and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes (as defined in para 140 of this Framework) but excluding those areas or assets of particular importance listed in footnote 7 of this Framework (other than land designated as Green Belt).']

No, we do not agree with the proposed definition of grey belt as stated - further changes are needed. As well as the specific changes proposed below, we agree that additional guidance is needed to provide further detail on the definition and its application (we have also made this view clear in response to Question 25 which asks about guidance).

Firstly, the exclusion of Footnote 7 areas must also include Local Wildlife Sites, ideally by adding Local Wildlife Sites to the list in Footnote 7.

Second, we note the consultation document's reference to Local Nature Recovery Strategies (LNRSs) - we strongly recommend that areas identified in draft or published LNRSs, that are of, or could become, of particular importance for biodiversity, be excluded.



Third, we also propose that the grey belt definition explicitly exclude recreation grounds and playing fields, if not designated as green spaces.

Fourth, the definition should explicitly exclude temporary uses from ‘substantial built development.’

If the Government proceeds with this proposal to define the grey belt only in contrast to the Green Belt and its purposes, we strongly recommend a national strategic review of Green Belt to ensure it is delivering the most effective land use. As the consultation document notes, Green Belt was designed and still is primarily about preventing urban sprawl, but the Green Belt also offers significant opportunities for nature, climate and access to and engagement with nature for people.

The identification of grey belt and local authority decision-making on grey belt and any releases of Green Belt should be informed by this national strategic review of Green Belt. The review should consider that the most effective land use is being delivered in the Green Belt, including by considering how any releases of Green Belt land could be complemented by the setting aside of further Green Belt land to form habitats and natural green corridors between designated nature sites. Habitats in these green corridors could be restored, to provide ‘more, bigger, better and joined up’ spaces for nature as recommended by the Lawton Review of wildlife sites. This would ensure that any changes to the Green Belt deliver tangible benefits for nature, with a net increase in nature-rich sites making a ‘Greener Belt.’

Question 24: Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria?

Yes. If the Government proceeds with the proposed approach, we agree additional measures will be needed to prevent the intentional degradation of land to make it closer to the grey belt definition.

As currently set out, there are some high-performing areas of Green Belt which in our view will meet the definition of grey belt as currently set out. For example, ‘urban land use’ could include parks, playing fields and recreation grounds, which provide important contributions to nature and access to nature, which in our view is ‘high performing’ Green Belt land.

Thus in our view, there should be a national strategic review of the Green Belt to inform the identification of grey belt and local authority decision-making on grey belt and any releases



of Green Belt. The review should ensure that the most effective land use is being delivered in the Green Belt. This will provide an additional safeguard against the intentional degradation of land to meet grey belt criteria.

Measures are needed to ensure exempt areas and assets of environmental value are not degraded to meet grey belt criteria. This should include having a Local Nature Recovery Strategy (LNRS) in place and integrated within the local plan, and decisions informed by up-to-date ecological information and expertise. A Preliminary Ecological Appraisal (PEA) should be undertaken to assess the biodiversity value of the individual site, which will inform the Strategic Environmental Assessment (SEA) for the plan area, before any Green Belt land is released. This will ensure that sites which have limited biological records are captured and protected from inappropriate development. Degradation of sites can also be deterred by using historic survey data, baseline habitat maps and aerial photography as evidence. If sites have been deliberately degraded, they should be restored and not released as grey belt. A minimum time limit for which land has to have to be proven to be PDL could also help to avoid deliberate degradation.

Question 25: Do you agree that additional guidance to assist in identifying land which makes a limited contribution to Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance?

Yes, we agree that additional guidance to assist in identifying land which makes a limited contribution to Green Belt purposes would be helpful. This guidance will be critical, given the lack of resources in local planning authorities, and in particular, the dearth of access to ecological expertise.

The Government should also conduct a national strategic review of the Green Belt, to ensure that the most effective land use is being delivered. The findings of this national review should inform the identification of grey belt and local authority decision-making on grey belt and any releases of Green Belt land.



Question 26: Do you have any views on whether our proposed guidance sets out appropriate considerations for determining whether land makes a limited contribution to Green Belt purposes? [Further info to be included in the glossary to the NPPF: ‘Land which makes a limited contribution to the Green Belt purposes will: a) Not strongly perform against any Green Belt purpose; and b) Have at least one of the following features: i. Land containing substantial built development or which is fully enclosed by built form, ii. Land which makes no or very little contribution to preventing neighbouring towns from merging into one another, iii. Land which is dominated by urban land uses, including physical developments, iv. Land which contributes little to preserving the setting and special character of historic towns.]

Yes, we do have views.

The definition of grey belt as currently proposed in the consultation is not sufficient for determining whether land makes a limited contribution to Green Belt purposes.

Firstly, while the Green Belt was designed and is still primarily about preventing urban sprawl, some areas of the Green Belt provide significant benefits for nature, climate, and access to and engagement with nature for people. We strongly recommend a national strategic review of the Green Belt to ensure the most effective land use is being delivered, to help inform local authority decision-making on any Green Belt releases.

If the Government proceeds with its proposed approach, we are concerned that the proposed guidance waters down the very purpose of Green Belt itself to prevent urban sprawl by allowing development where there is a ‘limited contribution’ to some of or even all of the Green Belt purposes, rather than no contribution at all.

Question 27: Do you have any views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced?

Yes, we strongly recommend that areas identified in draft or published Local Nature Recovery Strategies (LNRSs), which have biodiversity value or potential biodiversity value, be excluded from the definition of grey belt land, and also be considered for enhancement.

Any releases of Green Belt land should be accompanied by improvements to the wider Green Belt, such as the setting aside of further Green Belt land to form habitats and natural green or blue corridors between designated nature sites – this should be in line with LNRSs.



Once areas within the Green Belt have been identified, enhanced and/or created for nature they should be protected from future development. This could be achieved through a new Wildbelt designation – a robust and permanent spatial designation that will protect land in the process of being managed to bring nature back.

This would also help reinforce the cross-boundary role that LNRs should play and reinforce the importance of areas for nature that are close to settlements.

Question 28: Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations? [Changes to Para 147 in the [draft NPPF](#)]

Yes, we broadly agree with the sequential approach proposed in the consultation, with previously developed land in the Green Belt and grey belt land identified first, but the proposals must be significantly revised.

However, this process must be done through the local plan, with a holistic review by the local planning authority of land, including inland waters, in their areas to ensure Green Belt is assessed strategically. This approach is necessary to ensure that any release of Green Belt is not done in a piecemeal or fragmented way. Local authority plan-making and decision-making should be informed by a national strategic review of the Green Belt, to ensure that the most effective land use is being delivered.

Also importantly, sites should continue to be assessed for their value and potential value for biodiversity and local communities on a case-by-case basis and not based on land classification, such as 'previously developed land' or grey belt. Other factors will also need to be considered in order to determine whether Green Belt land is a suitable location for homes or other identified needs, including whether it is a sustainable location from climate, transport, and economic points of view, or whether there are other potential more beneficial uses of particular site, for example for providing local access to biodiverse green and blue space in urban areas which might lack good access to nature.



Question 29: Do you agree with our proposal to make clear that the release of land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole? [Changes to Para 142 in the [draft NPPF](#)]

No, we do not agree with this proposal as set out in the consultation document and draft NPPF.

The release of Green Belt land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole, but also in any specific areas. For example, a particularly strategic but narrow strip of Green Belt separating towns from merging - its release would not prejudice the whole plan area but it would undermine the role of Green Belt in this area.

We do agree with the general approach that the release of Green Belt must be done through the local plan process, rather than in decision-making. Individual sites released through decision-making might not prejudice the whole plan individually, but cumulatively or in combination, they could do.

Thus, a holistic review by the local planning authority of land in their areas is necessary to ensure any release of Green Belt is not done in a piecemeal or fragmented way. This local review should be informed by a national strategic review of the Green Belt, to ensure that the most effective land use is being delivered.

In addition, any release of Green Belt land should be accompanied by enhancement of the biodiversity value of remaining Green Belt land.

Question 30: Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend? [New para 152 in the [draft NPPF](#)]

No, we strongly disagree with the proposal to allow development on Green Belt land through decision-making.

The release of Green Belt must be done through the local plan process, rather than in decision-making. Individual sites released through decision-making might not prejudice the whole plan individually, but cumulatively or in combination, they could do.



Thus, a holistic review by the local planning authority of land in their areas is necessary to ensure any release of Green Belt is not done in a piecemeal or fragmented way. This local review should be informed by a national strategic review of the Green Belt, to ensure that the most effective land use is being delivered.

This proposal to allow development on Green Belt land through decision-making will also increase pressures for speculative development.

Question 31: Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision-making, including the triggers for release? [Again, new para 152, and also para 142, in the [draft NPPF](#)]

Release of Green Belt land should only happen through the local plan process, rather than decision-making. This should be informed by a holistic review by the local planning authority of land in their areas is necessary to ensure any release of Green Belt is not done in a piecemeal or fragmented way. This local review should be informed by a national strategic review of the Green Belt, to ensure that the most effective land use is being delivered.

If the Government pursues this approach, this should include the scope for mixed use sites, for example housing and employment, and other uses.

In addition, any release of Green Belt land should be accompanied by enhancement of the biodiversity value of remaining Green Belt land.

Question 36: Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs? [Para 155 and 156 of [draft NPPF](#) set an objective for new residents to access good quality green spaces within a short walk of home and specify that development proposals should meet local access to nature standards, or relevant national standards]

While we agree with the general approach to secure benefits for nature and public access where Green Belt release occurs, including through requiring development proposals to meet local or national standards on access to green space and urban greening, there are several improvements and expansions to the approach needed to ensure it delivers for nature and people as intended.



Currently, enhancing biodiversity itself is absent from the ‘golden rules.’ The importance of new developments delivering for nature is referenced in the text of the consultation but there are no specific policies provided in the consultation document or proposed wording in Paragraph 155 of the draft NPPF.

The Government should add a new golden rule mandating nature-friendly design measures for all new developments, requiring suitably designed and located swift bricks, bat boxes and bee bricks where appropriate, as well as green and brown roofs on flat spaces, and fish pass arrangements where necessary when development crosses rivers and streams. There are [existing nature-friendly design standards](#), which are currently voluntary, which could be built on to inform the golden rule. This could also potentially be implemented via a new chapter of the Building Regulations or in any National Development Management Policies (NDMP).

The ambition for Biodiversity Net Gain from new developments should be increased beyond the current minimum requirement of 10% (the minimum amount [needed to ensure no net loss](#)). There is [evidence](#) that going beyond 10% BNG has limited impacts on the cost of development.

Lastly, any releases of Green Belt land for development should also be complemented by setting aside further Green Belt land to form habitats and natural green and blue corridors between designated nature sites. Habitats in these corridors could be restored, to provide ‘more, bigger, better and joined up’ spaces for nature as recommended by the Lawton Review of wildlife sites. This would ensure that any changes to the Green Belt deliver tangible benefits for nature, with a net increase in nature-rich sites making a ‘Greener Belt.’ These compensatory Green Belt improvement requirements should be informed by the local LNRS and the national strategic review of Green Belt to ensure that the most effective land use is being delivered in the Green Belt.

Excluding the last point which applies specifically to released Green Belt land, these proposed ‘golden rules’ should be applied to all new development, not just to new development in Green Belt land. The Government has rightly identified essential aspects of new development such as affordable housing, local and national infrastructure, and access to nature - and in addition to nature-friendly design and increased biodiversity net gain, these minimum standards should be in place for all new development.



Question 42: Do you have a view on how golden rules might apply to non-residential development, including commercial development, travellers sites and types of development already considered ‘not inappropriate’ in the Green Belt?

Yes, the existing golden rules should be expanded to include nature-friendly design measures, increased level of Biodiversity Net Gain, and compensatory nature habitat within Green Belt – and these should all be applied to non-residential development.

A new golden rule should mandate nature-friendly design measures for all new developments, requiring suitably designed and located swift bricks, bat boxes, bee bricks, fish passes, where appropriate, as well as green and brown roofs on flat spaces. There are [existing nature-friendly design standards](#), which are currently voluntary, which could be built on to inform the golden rule. This could also potentially be implemented via a new chapter of the Building Regulations or in any National Development Management Policies (NDMP).

The ambition for Biodiversity Net Gain from new developments should be increased from the current minimum requirement of 10% (the minimum amount [needed to ensure no net loss](#)). There is [evidence](#) that going beyond 10% BNG has limited impacts on the cost of development.

Any releases of Green Belt land for development should also be complemented by setting aside further Green Belt land to form habitats and natural green and blue corridors between designated nature sites. Habitats in these corridors could be restored, to provide ‘more, bigger, better and joined up’ spaces for nature as recommended by the Lawton Review of wildlife sites. This would ensure that any changes to the Green Belt deliver tangible benefits for nature, with a net increase in nature-rich sites making a ‘Greener Belt’. These compensatory Green Belt improvement requirements should be informed by the local LNRS and the national strategic review of Green Belt to ensure that the most effective land use is being delivered in the Green Belt.

Question 46: Do you have any other suggestions relating to the proposals in this chapter [Chapter 5 on brownfield, Green Belt and grey belt]?

Yes.

The Government should conduct a national strategic review of the Green Belt, to ensure that the most effective land use is being delivered. The findings of this national review should



inform the identification of grey belt and local authority decision-making on grey belt and any releases of Green Belt land.

The existing golden rules for development in released Green Belt should be expanded to include nature-friendly design measures, increased level of Biodiversity Net Gain, and compensatory nature habitat within Green Belt. These golden rules should also be applied to all new development, not just to new development in released Green Belt land.

A new golden rule should mandate nature-friendly design measures for all new developments, requiring suitably designed and located swift bricks, bat boxes, bee bricks, and fish passes, where appropriate, as well as green and brown roofs on flat spaces. There are [existing nature-friendly design standards](#), which are currently voluntary, which could be built on to inform the golden rule. This could also potentially be implemented via a new chapter of the Building Regulations or in any National Development Management Policies (NDMP).

The ambition for Biodiversity Net Gain from new developments should be increased from the current minimum requirement of 10% (the minimum amount [needed to ensure no net loss](#)). There is [evidence](#) that going beyond 10% BNG has limited impacts on the cost of development.

Any releases of Green Belt land for development should also be complemented by setting aside further Green Belt land to form habitats and natural green and blue corridors between designated nature sites. Habitats in these corridors could be restored, to provide 'more, bigger, better and joined up' spaces for nature as recommended by the Lawton Review of wildlife sites. This would ensure that any changes to the Green Belt deliver tangible benefits for nature, with a net increase in nature-rich sites making a 'Greener Belt'. These compensatory Green Belt improvement requirements should be informed by the local LNRS and the national strategic review of Green Belt to ensure that the most effective land use is being delivered in the Green Belt.



Chapter 6 – Delivering affordable, well-designed homes and places

Question 59: Do you agree with the proposals to retain references to well-designed buildings and places, but remove references to ‘beauty’ and ‘beautiful’ and to amend paragraph 138 of the existing Framework [re the National Model Design Code, as set out in the [draft NPPF](#)]?

Yes, we agree with the proposals to retain references to ‘well-designed’ places and reinforce the importance of the National Model Design Code.

However, the National Model Design Code (NMDC) does not currently place adequate emphasis on the importance of nature and biodiversity in mitigating and adapting to climate change, in creating thriving and connected habitats for wildlife, in managing environmental risks (e.g., heat, flooding), and in delivering health and wellbeing benefits for local people and communities. The NMDC also lacks reference and detail on how landscape character will be taken into account in the design process, an important aspect of protecting local natural and cultural heritage. The NMDC should be updated with more specified policies and guidance on climate mitigation and adaptation and nature recovery.

While we agree in principle that development should be ‘beautiful’, this word is without clear definition and is subjective. In the context of nature and the built environment, some interpretations of ‘beautiful’ could result in interventions that damage nature. For example, removing grass verges or scrubby invertebrate-rich brownfield sites or unmanaged green spaces that can be the last undisturbed spaces for wildlife, or introducing inappropriate artificial lighting or non-native species.

Question 60: Do you agree with proposed changes to policy for upwards extensions? [Policy continues to support upwards extensions but with less of an emphasis on mansard roofs]

The current and the proposed upwards extension policy would likely interact with roosting bats in roofs, as well as potentially birds and local greenspace.

Adequate guidance is needed to support LPAs in deciding whether or not to permit an application where bats and nesting birds may be affected and where increased footfall due to densification might impact on local greenspace and access to nature.



Chapter 7 – Building infrastructure to grow the economy

Question 64: Would you support the prescription of data centres, gigafactories, and/or laboratories as types of business and commercial development which could be capable (on request) of being directed into the NSIP consenting regime?

No, we do not support data centres, gigafactories and/or laboratories as commercial development that could be capable of being directed into the NSIP consenting regime.

The NSIP regime was set up to deliver national and large-scale public service infrastructure, not commercial investments for profit, and the focus of the regime should remain on infrastructure, given how difficult and expensive NSIPs are to engage.

There is a risk that this generates a large number of applications out of line with the local development plan, that receive less local scrutiny, and where local impacts are considered less. In particular, data centres are very water-intensive and could put significant pressure on water availability in water-stressed areas. These types of development should continue to be consented through the plan-led system, with sufficient consideration of local impacts and local scrutiny. For example, data centres should be steered to places where there is surplus water available and be required to use low water consumption solutions and mitigate any potential nutrient outputs inconsistent with the Water Framework Regulations.

In addition, mandatory Biodiversity Net Gain (BNG) has not yet been applied to NSIP developments. If the Government were to pursue this proposal, there is a risk that these major development projects would be exempt from mandatory BNG in the gap before BNG is applied to NSIPs.

Question 66: Do you have any other suggestions relating to the proposals in this chapter?
[Chapter 7 on building infrastructure]

We would like to see further support in the NPPF for critical natural infrastructure, including green and blue infrastructure.

Currently, some green and blue infrastructure projects which have the potential to provide economic, social and environmental benefits, are not always prioritised through the planning system, or face planning barriers which compromise their viability or delivery.



We suggest adding a presumption in favour of sustainable development activity that will deliver genuine sustainable nature-based solutions. The only projects benefiting from this process should be those with a primary aim to protect and restore habitat, with any built footprint being confined to temporary or permanent structures to enable this restoration (for example, the restoration of a wetland or the construction of natural flood defences or the construction of fish passes, with new walkways and a small building for storing maintenance materials). This presumption could be accompanied by an accelerated consent process, whereby additional resources are deployed to allow for assessment processes to be completed in full, but at a faster pace than normal. Environmental assessment and the mitigation hierarchy should still be applied by experts to these fast-tracked projects, to ensure that impacts on species and landscapes have been avoided, mitigated for or, as a last resort, compensated for. Nature-based solutions benefiting from this process should also be informed by and align with the Local Nature Recovery Strategy and any local Biodiversity Action Plan.

Chapter 8 – Delivering community needs

Question 69: Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF? [Re a vision-led approach to transport planning in the [draft NPPF](#)]

Yes, we support in principle a vision-led approach to transport planning.

This vision must be set by the local planning authority, for example, in their relevant local transport plan, and joined up with other relevant local plans and policies, for example, Local Nature Recovery Strategies (LNRs), Catchment Management Plans, and local green and blue infrastructure plans. It would be helpful for the Government to set out a definition of ‘vision-led’ in the NPPF glossary.

Question 70: How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?

We agree with the Government that access to a network of high-quality open space is important for the health and wellbeing of communities, whilst providing further benefits for climate change mitigation and adaptation. Revising the NPPF is a good opportunity to put green and blue spaces, with all their benefits for people, nature and the climate, at the heart of planning policy.



a. Healthy communities

The NPPF does not provide any clear definition of ‘access to good quality green spaces *within a short walk* of their homes.’ This should be explicitly linked to the [Environmental Improvement Plan](#) commits to providing all people with access to a green or blue space within a 15 minute walk of home. This commitment also gives weight to, and complements, the wider set of access to greenspace standards in [Natural England’s Green Infrastructure Standards](#). However, in 2023, Natural England estimated that [a third of English households](#) do not have a natural space within 15 minutes’ walk.

There is robust scientific evidence of the physical and mental health, social, and cognitive benefits of accessing nature-rich green and blue spaces, including [longer life spans](#) and [higher life satisfaction](#). The resulting cost savings to the public health sector are enormous. Estimates by Natural England found that giving everyone in England good access to greenspace would reduce NHS pressures and [save £3 billion in health spending every year](#) (updated for inflation in 2023).

For example, wetland creation can benefit communities, and play a role in preventative healthcare. A WWT study showed that just 10 minutes in a wetland can boost moods, during a time where 1 in 4 people in England experience poor mental health each year, and poor mental health accounting for 40% of GP appointments. Wetlands also provide physical health benefits, due to promoting physical activity. Greater physical activity can help manage and prevent more than 20 chronic conditions and diseases and [could save the UK an estimated £7.4bn a year, including an NHS saving of £0.9 billion](#). For example, local child-centered angling opportunities [can have enormous benefits for community cohesion](#) and in fostering environmental stewardship of the area at very low ongoing cost.

Looking forward, we know that we are going to be experiencing more frequent heat waves, which pose a threat to human health. This is particularly true in urban areas, which experience urban heat island effects. The [London Climate Resilience Review](#), published in July 2024, identified heat risk as one of the key areas that needs urgent attention. The report says “a strategic, London-wide, action plan on heat risk is needed”, due to warmer temperatures and extreme heat having an impact on essential infrastructure (such as transport, water supply, health care), but also the direct impact on human health. Incorporating nature based solutions, such as blue and green spaces, urban trees, and [wildflower-rich grassland greenspace](#)s which cool the air and reflect solar radiation, would be an important tool in promoting healthy communities into the future. A [Woodland Trust study in 2023](#) found



temperature differences of up to 20 degrees Celsius between areas in direct sunlight and areas in the shade of urban trees.

Acting on the 15 minute access to nature commitment would not only boost the country's overall health, but make significant contributions to reducing health inequalities across income, ethnicity, ability, and region. Residents of the wealthiest areas in England and Wales have [80% more paths](#) and [twice as much green space](#) in their local area than the residents of the most deprived areas. [Almost 40% of Black, Asian, and Minority Ethnicity \(BAME\) people](#) live in England's most green space-deprived neighbourhoods, compared to 14% of white people. The [Tree Equity Score UK tool](#) also highlights inequalities in urban tree canopy cover across the country and can help to identify priority areas for increasing tree cover.

To meet the 15 minute commitment, all new developments must be required to strategically plan and design for all communities to have equitable nature-related health benefits. Local Green and Blue Infrastructure Strategies (as described in Natural England's Green Infrastructure Standards) could play a helpful role by extending public access rights to waterways, woodland, riversides, and grasslands. These Strategies must be integrated with other local plans, such as on transport, to improve transport links, especially active travel links, pathways, and green routes to access and enjoy green and blue spaces.

The public rights of way network in England is a unique and world class recreational resource which is a fundamental way for people to access nature. Unfortunately, it is chronically underfunded and neglected – around [one third of local authorities](#) cut their maintenance budget for public rights of way between 2014 and 2019. We need further funding for local authorities to maintain, improve and create more public rights of way to facilitate access to nature. Similarly, the 2031 cut-off date for registering historic rights of way should be removed, which would otherwise [eliminate access to thousands of paths](#), especially those between urban and rural areas.

In addition, the Government should maintain, protect, and expand urban green routes, which are urban leisure walking routes that provide pleasant, safe links to and between green spaces to provide access to nature close to where people live, such as [the London Loop](#) and [the Salford Trail](#). Urban green routes do not benefit from increased funding for active travel, because they are primarily (but not exclusively) used for leisure journeys. Despite their wide appeal and contribution to public health and wellbeing, there is still no dedicated central government funding pot to maintain, protect and expand them. For example, introducing wildflower-rich green infrastructure along the sides of walking and cycling routes through the adoption of [basic road verge management principles](#) could significantly improve the



biodiversity on our verges, help reduce mowing costs and carbon emissions from machinery, and bring benefits for wildlife.

Existing planning tools such as the Local Green Space designations and Neighbourhood Planning are vital in enabling communities to protect their parks and green spaces and their use should be supported.

[Evidence shows](#) that having opportunities for both direct and indirect contact with different sized greenspace at different distances, called “cumulative opportunity”, is a stronger and more consistent measure linking greenspace with health and wellbeing, compared to residential proximity alone. We welcome the call within the NPPF for working ‘across local authority boundaries.’

Doing so, alongside working with Local Nature Partnerships, could boost the cumulative opportunities for accessing green and blue spaces.

This will require collaboration with planners, public health experts, architects, ecologists, and more. Local design codes must be based on effective community engagement and reflect local aspirations for development in their area. Guidance should be adhered to, such as that contained in the National Design Guide, the National Model Design Code, Local Nature Recovery Strategies, local Nature Recovery Network (NRN) maps, local Biodiversity Action Plan, and local tree and woodland strategies. Health Impact Assessments should be conducted and considered during planning. Planning applications must be related to local environment and public health data and explain how improving access to greenspace contributes to the wider council’s agenda like physical activity, obesity, mental health, and reducing wider health inequalities.

b. Childhood obesity

Providing equitable access to green and blue spaces as outlined above will also help the childhood obesity crisis in the UK. Research around the world highlights that proximity to green and blue spaces is associated with [increased physical activity and reduced BMI in children](#). A 15 minute access to high-quality green and blue space in the UK would particularly contribute to the reduction of childhood obesity.

In particular, problems related to unsuitable or unsafe playgrounds is a barrier to outdoor activity in children. Studies show that low perceived safety reduces the likelihood of some



families using green spaces. Decades of underinvestment have contributed to [nearly 800 playgrounds in the UK facing closure](#) since 2013.

The built environment of parks can be planned to encourage use by children and families, to boost exercise and reduce childhood obesity. For example, in some parks access restrictions at gates to discourage antisocial behaviour (e.g., quad biking) [inadvertently meant that parents cannot access spaces with pushchairs](#). Having ample and strategically-placed lighting is critical for encouraging community members to visit the city park. Features promoting the safety and inclusivity of public spaces and natural spaces should also work for nature and climate. For example, Worcestershire has exemplar lighting policies which work for safety, as well as for energy consumption and for nocturnal animals such as bats.

Community engagement and consultation in the planning of new green and blue spaces or the retrofitting of existing green and blue spaces [is essential to creating safer, inclusive spaces](#). More diverse lived experience in the planning and landscape architecture industries can also help bring an intersectional perspective into planning and design.

Ensuring that national planning policy includes measures which encourage the protection of existing habitats and creation of new nature-rich blue and green spaces is essential. These must be well designed, using NE's Green Infrastructure Framework. Ideally, these spaces would involve communities within design stages to ensure they achieve what they aim to do. Health Impact Assessments should be conducted and considered in planning. Planning applications must be related to local environment and public health data and explain how improving access to greenspace contributes to the wider council's agenda like physical activity, obesity, mental health, and reducing wider health inequalities.

Question 71: Do you have any other suggestions relating to the proposals in this chapter?
[Chapter 8, delivering community needs]

Yes. The Government's recognition of the importance of planning for public infrastructure, transport infrastructure and promoting healthy communities is welcome. Integrated strategic planning which addresses social and environmental considerations, not just economic factors, is vital to delivering sustainable development.

The Government's proposals on strategic planning must include environmental considerations and must include environmental expertise in their development. With limited land in England and a range of differing demands on land, from nature recovery, climate



adaptation, housing, food production, water management, transport infrastructure, renewables infrastructure, and recreation, an approach to strategic planning that does not work across land uses will lead to various demands clashing or not being delivered. We look forward to working with the Government as they consult on, develop and test this new strategic planning approach.

There are other existing and emerging plans, such as Local Nature Recovery Strategies (LNRs), Green and Blue Infrastructure Strategies, and Catchment Management Plans, and other proposed mechanisms, such as the Land Use Framework, Strategic Spatial Energy Plan (SSEP) and other strategic spatial plans for infrastructure, which should be integrated into the Government's approach to universal coverage of strategic planning.

Chapter 9 – Supporting green energy and the environment

Question 72: Do you agree that large onshore wind projects should be reintegrated into the NSIP regime?

If the Government pursues this proposal, it must ensure the NSIP regime is fit-for-purpose by strengthening protections for Local Wildlife Sites and irreplaceable habitats, such as ancient woodland and peatland soils, in the relevant National Policy Statement (NPS), introducing mandatory BNG for all NSIP projects as soon as possible, bolstering the stakeholder and community engagement processes, and properly resourcing the Planning Inspectorate, local planning authorities, and Statutory Nature Conservation Bodies (SNCBs) to engage with the NSIP process.

Early and robust environmental assessment and community engagement is vital for NSIPs, as these projects are outside the plan-led approach and the NSIP regime decides projects on a case-by-case basis and so does not plan well for a programme of cumulative projects.

While it was previously committed to that BNG for the NSIP regime will come into force by November 2025, we would welcome further information on the government's progress with implementing this policy, as this would add further certainty that NSIPs will be required to meaningfully contribute to nature's recovery.

While we are supportive of the Government's aims to increase renewable energy generation to achieve net zero and contribute to the climate crisis, we do hold concerns in relation to the Critical National Priority presumption in the Energy NPS (designated January 2024). The



Government must ensure that the clean energy transition supports nature’s recovery and protects our most important and irreplaceable habitats.

Question 73: Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy? [Several changes in the [draft NPPE](#), including requiring LPAs to identify areas for renewables and give significant weight to project’s contribution to net zero]

No. While supportive of many of the changes proposed in this chapter, we have a specific concern that one of the changes could result in schemes with significant nature impacts here in the UK or overseas getting the go ahead.

We are supportive in principle of accelerating the delivery of climate infrastructure, including renewable energy, in order to mitigate climate change. Climate change is a primary driver of the decline of biodiversity: the achievement of net zero is critical for nature. On the other hand, if new infrastructure needed to meet net zero is planned and delivered poorly, it could run roughshod over important nature sites and wildlife. Protecting existing natural capital that sequesters and stores carbon, such as peatlands, species-rich grasslands, and woodlands, is also essential to achieving net zero.

However, we are concerned with some of the specific proposals in the NPPF aimed at giving greater support to renewable and low carbon energy. In particular, the proposed wording that LPAs should support ‘all’ forms of renewable and low carbon developments is very concerning. This could include damaging forms of development for climate and nature such as biomass energy. The wording should be revised to make clear that LPAs should look favourably upon such proposals unless there are significant reasons within the planning balance that warrant a refusal. Such reasons could include unacceptable harm to nature, including designated and irreplaceable habitats.

We do support the changes to Paragraph 163 further encouraging local planning authorities to give significant weight to the need to support better energy efficiency and low carbon heating improvements to existing buildings.

Across the board, the proposed changes to the NPPF in this consultation in our view do not add up to an integrated approach to climate and nature that will genuinely lead to nature restoration, alongside the scale and pace of climate-friendly infrastructure proposed. The



Government must move beyond just minimising harm to the natural environment and instead:

1. Restore the natural environment, especially protected sites and species, so that ecosystems are in better condition, climate-resilient, and well-connected.
2. Steer renewable energy projects to the right site through integrated national and local spatial strategic planning, with stronger protection for nature and better environmental information and optimising use of space on land.
3. Ensure development is green, designed and built to the highest environmental standards.

We are supportive in principle of the local planning authorities proactively identifying sites for renewable development when producing plans. This must be informed by integrated strategic spatial planning across land uses, including nature and planning and development, for example, by using the Strategic Spatial Energy Plan (SSEP), the Land Use Framework, and Local Nature Recovery Strategies (LNRSs). The identification of specific sites should be supported by the local authorities' Strategic Environmental Assessment of their local plan, to ensure nature and other environmental considerations inform the identification of sites.

This must be supported by additional ecological capacity and skills within local planning authorities, the [majority of which do not have an in-house ecologist](#) or have capacity to consider biodiversity in individual planning applications, let alone dedicate resources to more proactive, strategic planning such as proposed.

To deliver the scale and pace of climate infrastructure needed, in a way that works for nature, we recommend a strategic plan to increase deployment of wind and solar energy and associated infrastructure. The Strategic Spatial Energy Plan (SSEP), and the subsequent National Spatial Plan proposed above, should include an objective to increase the deployment of renewable energy, whether delivered through the main planning system or the Nationally Significant Infrastructure Projects regime. Onshore wind, solar and the grid infrastructure needed to transport renewable energy could then benefit from a presumption in favour of development if schemes meet the criteria set out in the Spatial Plan.

The presumption in favour should not apply in Protected Landscapes, SACs, SPAs, SSSIs, Local Wildlife Sites, tranquil areas, the highest quality farmland and where irreplaceable habitats or protected species would be impacted. Consideration could also be given to accompanying the presumption for spatially planned renewable projects with an accelerated consent process, whereby additional resources would be deployed to allow for site assessment



processes to be completed in full, but at a faster pace than normal. Environmental and ecological assessment, pre-application consultation and the mitigation hierarchy should still be applied in full to these fast-tracked projects, to ensure that impacts on species, landscapes and communities have been avoided, mitigated for or, as a last resort, compensated for.

Question 74: Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place?

Yes, there should be additional protections for habitats such as those containing peat soils, as well as habitats such as ancient and long-established woodlands, floodplain meadows and other species-rich grasslands, due to their role in carbon sequestration, as well as the other ecosystem services they provide. For example, floodplain meadows store [more than 200 tonnes of organic carbon per hectare](#) in just the top half metre of soil.

There should be additional protections for other important habitats for carbon sequestration, and other ecosystem services, such as pollination, water filtration, and urban cooling. This should include the expanded list of irreplaceable habitats developed by Natural England – and which the Government has promised to consult on, as well as an updated definition. Local Wildlife Sites should also receive stronger and more specified protection in the NPPF.

We would welcome further engagement with the Government on which habitats should receive additional protections and how these protections are designed and implemented and urge the Government to publish the irreplaceable habitats consultation as soon as possible.

Question 75: Do you agree that the threshold at which onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?

If the Government pursues this proposal, it must ensure the NSIP regime is fit-for-purpose by strengthening protections for Local Wildlife Sites and irreplaceable habitats, such as ancient woodland and peatland soils, in the relevant National Policy Statement (NPS), introducing mandatory BNG for all NSIP projects as soon as possible, bolstering the stakeholder and community engagement processes, and properly resourcing the Planning Inspectorate, local



planning authorities, and Statutory Nature Conservation Bodies (SNCBs) to engage with the NSIP process.

Early and robust environmental assessment and community engagement is vital for NSIPs, as these projects are outside the plan-led approach and the NSIP regime decides projects on a case-by-case basis and so does not plan well for a programme of cumulative projects.

While it was previously committed to that BNG for the NSIP regime will come into force by November 2025, we would welcome further information on the government's progress with implementing this policy, as this would add further certainty that NSIPs will be required to meaningfully contribute to nature's recovery.

While we are supportive of the Government's aims to increase renewable energy generation to achieve net zero and contribute to the climate crisis, we do hold concerns in relation to the Critical National Priority presumption in the Energy NPS (designated January 2024). The Government must ensure that the clean energy transition supports nature's recovery and protects our most important and irreplaceable habitats.

Question 76: Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50MW to 150MW?

If the Government pursues this proposal, it must ensure the NSIP regime is fit-for-purpose by strengthening protections for Local Wildlife Sites and irreplaceable habitats, such as ancient woodland and peatland soils, in the relevant National Policy Statement (NPS), introducing mandatory BNG for all NSIP projects as soon as possible, bolstering the stakeholder and community engagement processes, and properly resourcing the Planning Inspectorate, local planning authorities, and Statutory Nature Conservation Bodies (SNCBs) to engage with the NSIP process.

Early and robust environmental assessment and community engagement is vital for NSIPs, as these projects are outside the plan-led approach and the NSIP regime decides projects on a case-by-case basis and so does not plan well for a programme of cumulative projects.

While it was previously committed to that BNG for the NSIP regime will come into force by November 2025, we would welcome further information on the government's progress with



implementing this policy, as this would add further certainty that NSIPs will be required to meaningfully contribute to nature's recovery.

While we are supportive of the Government's aims to increase renewable energy generation to achieve net zero and contribute to the climate crisis, we do hold concerns in relation to the Critical National Priority presumption in the Energy NPS (designated January 2024). The Government must ensure that the clean energy transition supports nature's recovery and protects our most important and irreplaceable habitats.

Question 78: In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation?

There is [growing evidence](#) showing how nature-based solutions can be an effective tool both to mitigate climate change and to limit the impact of its effects. Compared to conventional engineered approaches, ecosystem based approaches to climate change adaptation [are often cheaper, can provide multiple benefits in the areas](#) where they are implemented, and are more adaptive to changing conditions in the future. Recent research found that in 65% of studies, [Nature-based Solutions are always more effective](#) in attenuating climate hazards compared to engineering-based solutions. Planning should put a stronger focus on multifunctional green infrastructure, which can improve adaptation, biodiversity, and amenities for local communities.

The planning system must include an overarching purpose to recover nature and tackle climate change, including to achieve Climate Change Act and Environment Act targets.

Retaining and avoiding impacts to existing habitats is vital to mitigate and adapt to climate change. Reinforcing the first step of the mitigation hierarchy to avoid environmental harm and heeding [Environment Agency advice on natural capital](#) are an essential first steps in planning for climate adaptation. Importantly, planning policies must ensure that green and blue spaces, including semi-natural habitats, that are already providing climate change mitigation and adaptation benefits are protected from development.

Planning policy should promote increased green and blue urban infrastructure, to boost resilience in towns and cities. The Green Infrastructure Framework sets out how to use nature to deliver multiple benefits, including adaptation to climate change. We recommend that the Government integrates the standards set out in the Green Infrastructure Framework into the NPPF or NDMPs to apply these standards to all new development, not just development in



released Green Belt land. Local plans should be required to have a Green and Blue Infrastructure Strategy that sets out how they intend to realise the Green Infrastructure Standards across their local area. Major developments should also be required to have a Green and Blue Infrastructure Plan setting out how they will deliver multiple benefits from nature restoration. Green and Blue Infrastructure Strategies and Plans should be required to take into account opportunities set out in Local Nature Recovery Strategies.

Climate-responsive local planning frameworks, which embed assessments of climate related risks (flooding, erosion, heat, wildfire), should be incorporated into decision-making toolkits.

Planning policy needs to put a greater emphasis on water resilience, including water supply and wastewater services. Planning must consider local water infrastructure and whether its longevity matches that of the development. This includes building in flexibility to allow future adaptation if it is needed, such as setting back new development from rivers so that it does not make it harder to improve flood defences in future. Government should implement Schedule 3 of the Flood and Water Management Act 2010 to make sustainable urban drainage (SuDS) mandatory for new developments, as well as the automatic right to connect. The NPPF should reinforce the implementation of Schedule 3 of the Flood and Water Management Act 2010 to ensure SuDS deliver multiple benefits, including flood resilience, water management, biodiversity, and boosts to wellbeing, as well as cooling where appropriate. All new homes and developments must meet water efficiency standards.

Looking forward, we know that we are going to be experiencing more frequent heat waves, which poses a threat to human health. This is particularly true in urban areas, which experience urban heat island effects. The London Climate Resilience Review (LCRR), published in July 2024, identified heat risk as one of the key areas that needs urgent attention. The report says “a strategic, London-wide, action plan on heat risk is needed”, due to warmer temperatures and extreme heat having an impact on essential infrastructure (such as transport, water supply, health care), but also the direct impact on human health. Incorporating nature based solutions, such as green and blue spaces which cool the air and reflect solar radiation, would be an important tool in promoting healthy communities into the future.

Woodlands, forests, and urban trees are an essential delivery mechanism for climate mitigation and adaptation. Healthy forests can provide protection against erosion, flooding and high temperatures simultaneously. Strategically planting trees across urban areas [can cool the air by between 2°C – 8°C](#), helping to build resilience within urban communities against threats facing the natural environment. In 2023 during a heatwave in June, the



Woodland Trust commissioned a professional thermal imaging company to take surface temperature readings in a range of locations in Cardiff – in the shade of urban trees and in direct sunlight next to the trees. The difference was stark: measurements of a 20 degrees Celsius difference between sunlight and shade in multiple locations were recorded. Typically the surfaces were pavements or roads but there was also a big difference on closely mown grass in the shade of trees or in direct sunlight. In addition to policy on street trees, the NPPF should emphasize the importance of strategically planted trees for urban cooling. There are currently no mandatory specific tree targets for urban areas, but this is where people need trees the most. Tree canopy cover is a useful indicator of tree presence and Forest Research suggests the minimum acceptable cover for UK towns is 20%, with most falling short of the minimum. Currently [only 27.6% of urban wards](#) have a tree canopy cover higher than 20%. The NPPF and any NDMPs should include a requirement for a [minimum of 20% of tree canopy cover](#), with a duty for local authorities to deliver this and LNRs to support where suitable. For new housing developments a [30% tree canopy cover is recommended](#) to ensure streets are lined with trees and residents have access to nature-rich woodlands, while retaining mature trees where possible.

Ancient and long-established woods store more carbon per hectare than other woods. All ancient woodlands are irreplaceable and therefore should be given additional legal weight in the NPPF and forthcoming National Development Management Policies (NDMP) to prevent harm to these environments from development.

Planning policy should give greater priority to improving, modernising and repurposing existing homes, buildings and estates. Constructing new builds produces more carbon dioxide than refurbishment and consumes more land which might otherwise be used to support nature’s recovery and climate adaptation.

Homes and commercial properties (new and retrofit) should be designed and built to the best net zero standards, with minimal embodied carbon and high energy efficiency.

Changes should also be delivered in relation to agricultural development to mitigate the climate harm from intensive livestock farming. Under the current NPPF, the number of intensive livestock units has expanded rapidly, including the granting of planning permission in very polluted catchments such as the Wye Valley, Norfolk and Yorkshire. The NPPF should support sustainable rural development where it contributes to climate and nature objectives, including the recovery of water quality, but not where it risks worsening already polluted catchments. Paragraph 88 should be edited to read: “Planning policies and decisions should enable: The sustainable growth and expansion of enterprises in rural areas, where they



contribute to sustainable development goals. Developments that support agroecology should be supported.”

The Government should specify in the NPPF that no new intensive livestock units in areas where environmental limits have been breached should be granted. The Environmental Audit Committee [also recommended this approach](#) in 2022.

Policies and planning for climate mitigation and adaptation must be supported by additional planning capacity and ecological skills within local planning authorities, the [majority of which do not have an in-house ecologist](#) or have capacity to consider the environment in individual planning applications.

Question 80: Are any changes needed to policy for managing flood risk to improve its effectiveness?

Yes. The UK is not sufficiently adapted to the risks of climate change and extreme weather, including increasingly severe extreme rainfall and flooding events. Successive [Climate Change Risk Assessment Reports](#) identify flooding as one of the most significant risks associated with climate change. The severe impact of flooding is exemplified by the storms of autumn 2023 and associated flooding events, which led to hundreds of thousands of pounds worth of damage, environmental destruction and pollution, and tragically loss of life. With climate change, these risks and impacts will only become more severe and more frequent.

Opportunities to manage and mitigate flood risk more effectively through green solutions, working with nature at catchment scales, are currently being missed. Nature-based solutions (NBS) and Natural Flood Management (NFM) approaches help build resilience to flooding and buffer the impacts, through slowing the flow of water and holding more of it within the environment. This is achieved through protecting and restoring the natural functions of catchments, floodplains, and water systems.

These green solutions are often cheaper to implement than conventional ‘grey’ solutions, and can also deliver multiple benefits for people and wildlife. This also creates the opportunity to bring in private investment, through blended finance, further increasing value for money. A [Parliamentary POSTnote concluded in 2020](#) that ‘these co-benefits may be significant enough to justify investment in natural flood management even where the flood mitigation benefits alone do not’. These green solutions can also be used strategically alongside traditional grey



options, including engineered flood defences, to alleviate stress on this infrastructure and to increase their longevity.

To unlock greater use and uptake of NBS and NFM to manage and mitigate flood risk, the following is required from Government:

- A clear, strategic regulatory framework that will drive all regulators towards facilitating NBS and NFM, and that will provide investors with the necessary framework and incentives.
- Clear, comprehensive national guidance to ensure that high quality NBS and NFM are delivered consistently.
- Adequate funding for regulators and local authorities, to ensure that they have sufficient expertise, training and resources to facilitate these projects.
- Making Natural England's green and blue infrastructure standards compulsory for all new developments. This will provide a new planning route for NBS creation.
- Greater provision of funding for NBS and NFM projects, for example, through the flood grant-in-aid fund.
- Stronger links between Local Nature Recovery Strategies (LNRs) and Catchment Management Plans and local development plans.

Farmers should also be better rewarded under Environment Land Management (ELM) schemes for working with nature to restore the health of soils, floodplains and wetlands, and for taking actions that are water-friendly. For example, widening river buffers will help to protect water quality from nutrient and chemical run-off during floods and from habitat damage due to livestock entering watercourses, and will so protect and build capacity for river levels to rise safely during heavy rainfall. Restoration of floodplain meadows can also help mitigate water pollution, and help absorb and slow the flow of flood water.

There should be more emphasis and encouragement for developing wet woodlands in Woodland Creation ELM packages. Woodland creation and tree planting beside watercourses can provide effective natural flood defences by absorbing rainwater, slowing the flow, and [reducing flood peaks by up to 65%](#). Soil in wooded areas is porous, with pore spaces that can soak up and store rainwater 60 times more effectively than soil in grasslands. Woodlands also act as a buffer to prevent pollutants from entering nearby watercourses, improving rainwater infiltration, providing cover for spawning and juvenile fish, and reducing soil erosion.

Government should also implement Schedule 3 of the Flood and Water Management Act 2010, to make sustainable urban drainage mandatory for new development and ensure that



sustainable drainage systems (SuDS) meet adequate standards. SuDS help to slow and reduce surface runoff, thereby reducing flood risk from new developments.

Furthermore, Government must set a quantified long-term target for flood resilience. Currently, no such target exists, despite recommendations from the National Infrastructure Commission, Climate Change Committee and the National Flood Forum.

There is inconsistency between Lead Local Flood Authorities (LLFAs) in deciding whether wetland areas for flood management requires permissions from their planning teams, as it is up to their discretion.

There are often discussions around liability with Natural Flood Management (NFM) implementation, with much of the policy stating that the landowner is liable for the interventions and any potential changes in water flows. This is often a barrier to landowners wanting to get involved in delivery. Though not directly related to planning, it is part of the consenting process which is delivered in the LLFA (who work alongside their planning teams).

Furthermore, UK agencies with responsibilities for managing flood risk are facing significant budget and capacity shortfalls, undermining their ability to do this robustly and effectively. For example, in November 2023, the NAO reported a £34 million shortfall in funding required for the Environment Agency to maintain high consequence flood defence assets. This shortfall meant that [203,000 additional properties](#) were at risk of flooding. These funding and resource shortfalls must urgently be addressed.

Question 81: Do you have any other comments on actions that can be taken through planning to address climate change?

Yes.

Currently, planning permission and an environmental permit is needed only for agriculture developments that have capacity for over: 40,000 poultry or 2,000 production pigs (over 30kg) or 750 sows. This refers to the number of animals per 'installation', or operating facility. These thresholds are incentivising developers to create more smaller operations, to fall outside the control of permitting and planning regulations.

The threshold should be lowered for poultry and pig installations, and explicit thresholds set for cattle and other forms of livestock to bring these facilities within the planning and



permitting system, as per the recommendations of the Wildlife and Countryside Link briefing on reducing the harms from intensive livestock permitting [here](#).

More generally, the agriculture transition must not be seen as farming policy alone, but as part of a package of national policy to address climate change and biodiversity loss while meeting nutrition targets, by transitioning to nature-friendly approaches to food production such as focusing on [maximum sustainable output](#) and agroecological farming. The planning system can shape the transition by preventing intensification through farm developments that increase emissions, contribute to diffuse environmental pollution and low-welfare conditions for animals. In short, planning should prevent increases in livestock numbers, where increases cause environmental harm, until greenhouse gas emissions from livestock and their waste can be properly mitigated at scale.

Question 82: Do you agree with removal of this text from the footnote? [Footnote 63 in the [draft NPPF](#) re food production]

We do not have a view on this proposal.

Investment in the high ambition elements of Environmental Land Management (ELM), implementation of Local Nature Recovery Strategies (LNRSs), and the delivery of a cohesive, cross-departmental Land Use Framework need to work in harmony to balance competing land uses and determine how to deliver nature recovery, climate resilience and food production alongside development.

Question 83: Are there other ways in which we can ensure that development supports and does not compromise food production?

There is limited land in England and a range of differing demands on land, from nature recovery, climate adaptation, housing, food production, water management, transport, renewables infrastructure, and recreation. Currently these demands are largely dealt with separately through a patchwork of different regimes and different parts of the planning system, often leading to various demands clashing with each other and over-bidding on what can actually be delivered.



An approach to strategic planning that does not work across land uses will lead to various demands clashing or not being delivered. We look forward to working with the Government as they consult on, develop and test this new strategic planning approach.

We are also advocating for a Land Use Framework that is an overarching, England-wide spatial document which identifies where and how different land uses can be aligned to maximize co-benefits and ensure that national environmental targets, and other national targets with land use needs or implications, are met. There is already a welcome consensus behind the need for a Land Use Framework, with Defra actively working on proposals. However, this draft document is reported to be relatively limited in scope, focusing principally on agricultural land use. A poorly designed, isolated Framework could add complexity or prove irrelevant.

To be effective, the Land Use Framework must be target and outcome-driven (for example, having the achievement of net zero by 2050 and the pledge to protect at least 30% of land for nature at its heart), backed by strong implementation including through planning policies and decisions and consenting and spending decisions, and be transparent and adaptable for delivery.

Strong implementation is key. The suite of National Policy Statements underpinning the major infrastructure consenting system should all align with the Land Use Framework. Energy infrastructure should be brought forwards in line with a Strategic Spatial Energy Plan (SSEP), which is also aligned with the Land Use Framework, underpinned by a robust Strategic Environmental Assessment (SEA) and plan-level HRA (Habitats Regulations Assessment), and in a nature positive way, with nature recovery one of the SSEP core objectives.

Strategic spatial planning should go beyond the Land Use Framework and spatial approaches to strategic energy planning. Both documents, alongside other strategic approaches such as river basin and water catchment planning, should be brought together to produce a National Spatial Plan, a single coherent framework for land use and placemaking, giving clarity and confidence to everyone involved in the planning system. This National Spatial Plan should be target driven, backed by strong implementation duties and adaptable, as set out above.



Question 84: Do you agree that we should improve the current water infrastructure provisions in the Planning Act 2008, and do you have specific suggestions for how best to do this?

We believe there may be benefits to improving the current water infrastructure provisions in the Planning Act 2008.

Historic underinvestment means that water infrastructure is not resilient and has not kept pace with changing climate and population needs. No new reservoirs have been built in water-stressed southern England since 1976, and we currently lose nearly 20% of water supply to leaks – equivalent to 2.4 billion litres per day across England’s nine major water companies. Sewerage and wastewater systems have also failed to keep pace with population and climate change. For example, sewage spills from Storm Overflows that are intended only for use during extreme rainfall have become habitual and the water supply system is already struggling to cope with demand during high temperature events. [Ofwat’s 2022-2023 water company performance report](#) shows that the industry continues to underspend on investment programmes.

Planning permissions and consents must specify the provision of adequate wastewater and water supply measures by all development that uses water. This should align with Ofwat’s Price Review 24 processes so that developers and water companies are clear on what they must invest in to get planning permissions.

Question 85: Are there other areas of the water infrastructure provisions that could be improved? If so, can you explain what those are, including your proposed changes?

Yes.

Schedule 3 of the Flood and Water Management Act 2010 should be swiftly implemented, to provide Sustainable Drainage Systems (SuDS) capable of managing drainage whilst boosting biodiversity, across all developments.

A presumption in favour of sustainable development activity that will deliver genuine sustainable nature-based solutions should be introduced. The only projects benefiting from this process should be those with a primary aim is to protect and restore habitat, with any built footprint being confined to temporary or permanent structures to enable this restoration (for example, the restoration of a wetland or floodplain meadows, or the



construction of natural flood defences, with new walkways and a small building for storing maintenance materials). This presumption could be accompanied by an accelerated consent process, whereby additional resources are deployed to allow for assessment processes to be completed in full, but at a faster pace than normal. Environmental assessment and the mitigation hierarchy should still be applied to these fast-tracked projects, to ensure that impacts on species and landscapes have been avoided, mitigated for or, as a last resort, compensated for. Nature-based solutions benefiting from this process should also be informed by and align with the Local Nature Recovery Strategy and any local Biodiversity Action Plan.

We suggest that improvements could be made in the following areas:

- Incorporating water scarcity into the sitings of new development to steer them away from water stressed areas. Furthermore, new developments in water stressed areas should be required to minimise additional water demand, through water efficiency measures, water reuse, and water neutrality. For example, the introduction of rainwater harvesting requirements in new developments.
- Further water efficiency commitments should be implemented as soon as possible, including changes to Building Regulations to tighten water efficiency standards, and the introduction of water efficiency labels.
- Unlocking greater use of nature-based solutions and natural flood management to keep more water in the environment, increase resilience, and deliver multiple benefits for people and nature. These green solutions will also help to increase the resilience of built infrastructure, including flood defences, water resources infrastructure, sewerage and wastewater infrastructure.
- Removing restrictions on water meter rollouts.
- Fish passage must be facilitated in all water infrastructure.

Question 86: Do you have any other suggestions relating to the proposals in this chapter?

[Chapter 9 on green energy and the environment]

We are supportive in principle of accelerating the delivery of climate infrastructure, including renewable energy, in order to mitigate climate change. Climate change is a primary driver of the decline of biodiversity: the achievement of net zero is critical for nature. On the other hand, if new infrastructure needed to meet net zero is planned and delivered poorly, it could run roughshod over important nature sites. Protecting existing natural capital that sequesters and stores carbon, such as peatlands, semi-natural grasslands, and woodlands, is essential to



achieving net zero. New places and communities must have nature, climate, and the health and wellbeing of people at their heart.

An integrated approach to nature recovery and planning can lead to climate-friendly infrastructure development and nature restoration at scale and pace:

1. Restoring the natural environment, especially protected sites and species, so that ecosystems are in better condition, climate-resilient, and well-connected.
2. Steering renewable energy projects to the right site through integrated national and local spatial strategic planning, with stronger protection for nature and better environmental information and optimising use of space on land.
3. Ensuring development is green, designed and built to the highest environmental standards.

This must be supported by additional ecological capacity and skills within local planning authorities, the majority of which [do not have an in-house ecologist or have capacity](#) to consider biodiversity in individual planning applications, let alone dedicate resources to more proactive, strategic planning such as proposed.

To deliver the scale and pace of climate infrastructure needed, in a way that works for nature, we recommend a strategic plan to increase deployment of wind and solar energy and associated infrastructure. The Strategic Spatial Energy Plan (SSEP), and the subsequent National Spatial Plan proposed above, should include an objective to increase the deployment of renewable energy, whether delivered through the main planning system or the Nationally Significant Infrastructure Projects regime. Onshore wind, solar and the grid infrastructure needed to transport renewable energy could then benefit from a presumption in favour of development if schemes meet the criteria set out in the Spatial Plan. The presumption in favour should not apply in Protected Landscapes, SACs, SPAs, SSSIs, Local Wildlife Sites, tranquil areas, the highest quality farmland and where irreplaceable habitats or protected species would be impacted. Consideration could also be given to accompanying the presumption for spatially planned renewable projects with an accelerated consent process, whereby additional resources would be deployed to allow for site assessment processes to be completed in full, but at a faster pace than normal. Environmental assessment, pre-application consultation and the mitigation hierarchy should still be applied in full to these fast-tracked projects, to ensure that impacts on species, habitats, landscapes and communities have been avoided, mitigated for or, as a last resort, compensated for.



Given the strong emphasis on supporting new housing and infrastructure elsewhere in the NPPF, there is likely to be increased pressure for development on, or close to the boundaries of Protected Landscapes. It is, therefore, vital that the local planning authorities for areas adjoining Protected Landscapes understand their responsibilities with regard to the new duty in S245 of the Levelling Up and Regeneration Act (LURA) 2023 which requires them to seek to further the purposes of National Parks and National Landscapes when making decisions which affect the land in these areas (which would include planning decisions in areas on, or close to, their boundaries). There is an opportunity to include a reference to this important new duty as part of use these revisions to the NPPF.

Chapter 12 – The future of planning policy and plan making

Question 105: Do you have any other suggestions relating to the proposals in this chapter?

[Chapter 12 re the future of planning policy and plan-making, also covers NDMPs and digital approaches to planning]

Reforms to funding, enforcement and data could improve outputs for nature from individual development applications and consents, whilst also smoothing and quickening processes for renewable energy and housing projects.

Systems designed to protect nature can only work well and swiftly if there are sufficient people and expertise in place to implement and enforce them. Over the past decade, both local authorities and the environmental statutory consultees have faced huge resourcing challenges due to funding decisions made by successive Governments.

A [2022 ALGE/ADEPT survey](#) commissioned by Defra found that 26% of local planning authorities do not have any access to ecological expertise and that only 5% of respondents reported that their current ecological resource (including in-house and external sources) is adequate to scrutinise all applications that might affect biodiversity. This survey was conducted before the introduction mandatory Biodiversity Net Gain, an important policy, but one only likely to put more strain on already-limited local planning authority and planning ecological capacity. The [Office for Environmental Protection's 2023 report](#) on environmental assessment highlighted resourcing issues as a key reason why the current system of assessment is not functioning effectively.

These trends are not new and [should be swiftly reversed](#), with higher application fees and new higher charges for statutory consultee advice, and increased central funding, paying for



more in-house technical expertise both for local planning authorities and statutory consultees such as Natural England and the Environment Agency. This significant expansion in both ecological expert resources and core planning resourcing will streamline assessment processes and lead to faster decisions, for the benefit of both climate and housing projects. It should also enable more meaningful engagement and consultation with local communities. Increased resourcing should be accompanied by concerted efforts to make local authority planning roles more attractive and to help retain planning expertise within the public sector. Local authority planners have a critical role to play in safeguarding communities against climate and ecological breakdown and their status and remuneration should reflect this.

More planning officers, advised by more ecology officers and better resourced statutory consultees, can more effectively and swiftly strategically plan, conduct and check environmental assessment, scrutinise individual planning applications, design planning conditions and other requirements that effectively apply the mitigation hierarchy to individual development sites.

The current planning system generates a lot of environmental data, from the SEA and EIA regimes and from the appeals process. Frustratingly however, the bulk of this data is not made available for re-use. Even when data is available, it can vary considerably in format and quality.

Planning reforms should set national standards for environmental data and create a shared data platform, accessible to all stakeholders. This was a recommendation both of the 2023 OEP environmental assessment report and of the 2023 National Infrastructure Commission's report on achieving net zero, which the current Government has promised to review and respond to by 2025.

Much swifter action is needed to get the nationwide environmental data platform up and running. Environmental information collected for all development projects should be added to this national data platform, including information from projects that do not receive planning consent. Existing government-held data and resources, including Defra's Magic Map (containing spatial data on habitats, species and landscapes), could provide a solid foundation for this data platform to grow. It would also signpost to other useful data sources, such as the species data platform run by the National Biodiversity Network Trust (NBN Atlas), data from Local Environmental Record Centres and information collected by Local Nature Partnerships and Local Nature Recovery Strategies.



The establishment of this new information portal, which could be titled the ‘National Environmental Observatory,’ will require start-up and maintenance funding, to integrate different data sets, support the providers of these existing data sets, provide quality assurance, ensure suitable curation and allow all interested parties to access and practically use the data.

Developers should be required to provide data in a consistent manner across England, to allow for easier integration. This investment will return multiple benefits. A national environmental data platform will allow for much greater understanding of habitat and species extent and condition, informing measures to restore both to better health.

The drive to meet Environment Act targets will benefit from improved information as to the distance still to go. Accessible, clear environmental data will also significantly shorten the environmental assessment process, allowing existing data to be used in assessments where relevant, cutting down on duplication and allowing climate and housing projects to proceed more swiftly. Across the board, better data will lead to greater certainty and efficiencies for developers and investors, and better outcomes for implementation of BNG, and LNRS recommendations.

Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 86 organisations to campaign for nature, climate, animal welfare and a healthy environment for everyone. Wildlife and Countryside Link is a registered charity number 1107460 and a company limited by guarantee registered in England and Wales number 3889519.

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The following organisations support this consultation response:

Amphibian and Reptile Conservation

Buglife

Campaign for National Parks



Chartered Institute of Ecology and Environmental Management (CIEEM)

CPRE – The countryside charity

Freshwater Habitats Trust

Froglife

FOUR PAWS UK

Institute of Fisheries Management

Open Spaces Society

People's Trust for Endangered Species

Plantlife

RSPB

The Rivers Trust

The Wildlife Trusts

Trees for Cities

Waterwise UK

Woodland Trust

Zoological Society of London