

New Towns Draft Programme – Link response

12 May 2026

This response is on behalf of nature and animal welfare coalition Wildlife and Countryside Link ([Link](#)).

Wildlife and Countryside Link (Link) welcomes the inclusion of an environmental sustainability principle within the New Towns placemaking framework, and the commitments to mitigation via the Strategic Environmental Assessment (SEA).

However, our overriding concern is that the proposed planning policy and the SEA mitigation framework, as currently drafted, are not sufficient to ensure that new towns deliver genuinely nature-positive outcomes. For settlements of 10,000 homes or more, which will permanently transform large areas of land, this is a serious and consequential omission.

The scale, visibility and longevity of new towns mean they will define the relationship between housing development and nature recovery for generations. Yet the planning policy assigns substantial explicit weight to social and economic benefits while leaving environmental obligations vague, unquantified unambitious and unenforceable. It creates a near-automatic presumption in favour of Green Belt release with no environmental conditionality. It sets no BNG target beyond the statutory minimum of 10%, a floor that government's own modelling acknowledges may barely achieve no net loss, and which Link's research shows is already being significantly under-delivered in practice. And it relies on aspirational placemaking principles where numerical targets are provided only for affordable housing, with nature and access to it left to discretion.

These deficiencies are critical structural weaknesses that risk producing large-scale, permanent ecological harm under the cover of a development presumption, with no enforceable mechanism to ensure that nature recovery keeps pace with housing delivery. This would be inconsistent with England's legally binding environmental targets under the Environment Act 2021, and with the Government's own commitments to halt and reverse the decline of nature.

New towns are a once-in-a-generation opportunity. With the right ambitious environmental standards, enforceable masterplan requirements, LNRS alignment from designation, and independent scrutiny with genuine accountability, they could become exemplars of nature-positive development at scale. To achieve this, we make several key recommendations in response to the questions within our remit, which we urge the Government to adopt.

Consultation questions

Introduction

Question 1

Which of the following best describes how you are responding to this consultation?

- as an individual member of the public
- on behalf of an organisation
- as both an individual and on behalf of an organisation

Question 2

Which area are you responding about?

- potential new town location
- wider region
- national interest
- I'm not responding about a specific location/region

Question 3

What is your connection to the proposed location/region?

- resident nearby
- landowner
- local authority
- developer
- environmental organisation
- professional interest
- no specific connection
- other

Question 4

If you are responding on behalf of an organisation, please select the type of organisation you are responding from below:

- private sector business
- charity
- social enterprise
- local authority
- government department or agency
- housing association / registered provider
- professional or representative body
- academic institution
- not applicable
- other

Question 5

If you are responding on behalf of an organisation, please provide the name of your organisation here.

Wildlife and Countryside Link

Question 6

If you are responding on behalf of an organisation, what size is your organisation?

- micro (1 to 9 employees)
- **small (10 to 49 employees)**
- medium (50 to 249 employees)
- large (250+ employees)
- not applicable / don't know

Section 3.1 - Assessment of locations

Question 7

Thinking about the 13 locations listed, which locations do you believe have positive features that could help achieve the objectives of the New Towns programme?

What do you believe are the positive features of the location(s) you have selected?

N/A

Question 8

Do you think any of the 13 locations listed face barriers which could hold back delivery of the New Towns Programme objectives?

(Yes/No/Not sure)

If you answered yes, please tell us what you believe the barriers to delivery in the location(s) you have selected are.

N/A

Question 9

Do you think the SEA report has identified the main environmental issues relevant to the 13 locations?

(Yes/No/**Not sure**)

If you answered no, please expand here.

Not sure.

Question 10

Is there any additional environmental information about these locations that the SEA should take into account?

(**Yes**/No/Not sure)

If you answered yes, please tell us what additional information the SEA should take into account

Yes.

We would encourage the SEA to include up-to-date data on species presence and distribution both within and beyond specifically designated protected sites, including in the immediate vicinity, and consider the relevant information on, and prioritisation of, species in Local Nature Recovery Strategies. Current evidence and guidance indicate that many species are legally protected regardless of whether they fall outside of designated areas, and that protected sites represent only a subset of wider ecological networks.

Focusing solely on designated sites risks overlooking important populations, habitats, and ecological corridors in surrounding or undesignated areas, which may also be sensitive to development pressures. The SEA should therefore incorporate comprehensive on-the-ground and desk-based ecological survey data, including records of priority and protected species outside site boundaries, to ensure a robust assessment of potential environmental impacts.

Question 11

Do you have any suggestions for practical mitigation measures to address effects identified in the SEA report?

(Yes/No/Not sure)

If you answered yes, please set out the practical mitigation measures here.

Yes.

We welcome the recognition within the Strategic Environmental Assessment (SEA) that the new towns have the potential for significant negative effects on biodiversity, and that mitigation will be required. However, the mitigation measures identified are insufficient to address the scale of the potential environmental impacts, and the proposed framework lacks the ambition, specificity, and enforceability required to deliver meaningful mitigation. Furthermore, the programme should be aiming for net-enhancement, not simply mitigation.

It is crucial given the Government's statutory nature recovery objectives and commitments that any new towns embed nature recovery at the heart of placemaking. We set out our concerns and proposed improvements below.

1. More ambitious Biodiversity Net Gain (BNG) requirements

The SEA mitigation framework relies substantially on the statutory requirement to deliver a minimum of 10% BNG "where developments are not exempt". We are concerned that the minimum 10% is an

insufficient target for developments of this scale and that it should not be treated as either a ceiling, or a reliable guarantee of no net loss.

The Government's initial 2018 impact assessment for BNG made clear that a 10% requirement represented the minimum level at which net gain, or at least no net loss, could be achieved.¹ In practice, it recognised that the 10% figure is likely to be eroded over time by a range of factors, including habitat degradation occurring between the initial baseline assessment and the completion of construction, as well as ongoing pressures associated with occupation, such as increased light and noise pollution from residents. It also highlighted the risk that any biodiversity gains secured at the outset could deteriorate or be lost altogether over the decades-long lifespan of a development. As such, 10% BNG was clearly intended as a minimum floor, not as a meaningful guarantee of nature recovery alone. For large-scale new towns, which will generate sustained and long-term pressures on surrounding habitats, aiming for only 10% creates a real risk of net biodiversity loss in practice. The SEA itself acknowledges the potential for "significant negative effects" on biodiversity, yet the proposed mitigation relies on a target that government modelling suggests may barely break even.

A number of authorities and development schemes have already demonstrated that going well beyond 10% is both technically feasible and commercially viable.² New towns, as exemplar developments with the scale to deliver significant strategic nature recovery should lead by example. We recommend that all new towns be required to deliver a minimum of 30% BNG, regardless of location type.

Furthermore, it is concerning to see the SEA's qualification that BNG requirements apply only "*where not exempt*." This caveat introduces significant risk to both the delivery of BNG and reliance on it within the New Towns Programme for several reasons.

Firstly, the Government is consulting on a new brownfield residential exemption to BNG. Given that several proposed new town locations have a significant brownfield component, large portions of these developments could be excluded from BNG requirements entirely under this proposed exemption.

Secondly, conclusive evidence shows widespread misuse of the existing de minimis exemption, under which developers self-declare "no impact" on biodiversity to avoid BNG obligations.³ The data indicates that 86% of eligible developments in year one of the BNG regime claimed exemptions, including many large sites alleging 'no impact', a figure that raises serious questions about the integrity of the current system.⁴

¹ https://consult.defra.gov.uk/land-use/net-gain/supporting_documents/181121%20%20Biodiversity%20Net%20Gain%20Consultation%20IA%20FINAL%20for%20publication.pdf

² https://www.wcl.org.uk/docs/Net_Gain_One_Year_On1.pdf

³ <https://private-url--lifescape.netlify.app/uploads/BNG%20Market%20Report,%20eftec,%20260625.pdf>

⁴ <https://private-url--lifescape.netlify.app/uploads/BNG%20Market%20Report,%20eftec,%20260625.pdf>

The introduction of a new brownfield exemption would risk compounding this problem significantly. The Government must not create new loopholes that undermine BNG compliance precisely when the most ambitious and ecologically consequential developments in a generation are being brought forward. At a minimum, the policy framework for new towns must make clear that BNG is mandatory for all new town development, regardless of site type, location, or brownfield status.

2. Current mitigation measures are insufficiently robust, clear, or ambitious

The SEA identifies a number of additional mitigation opportunities, including alignment with Local Nature Recovery Strategies and application of the mitigation hierarchy, that we broadly welcome. However, as currently framed, these measures are vague and unlikely to deliver consistent outcomes across the Programme. In particular:

- A "requirement to establish clear and effective ways to engage" with Natural England and relevant bodies is welcome in principle, but without specificity about the form, timing, and weight given to that engagement (and the associated emphasis on nature recovery as opposed to economic growth), it is unlikely to result in substantive changes to development proposals.
- The suggestion that exceeding 10% BNG "could be delivered on occasion or where circumstances allow" sets a low bar. Given the scale of developments proposed, and their impacts, higher BNG ambitions should not be contingent on any specific circumstances but should be embedded in the framework from the outset.
- The framing around Local Nature Recovery Strategies (LNRSs) as something developments should "take account of" is insufficient. New towns should be required to actively align with and contribute to the spatial priorities identified in LNRSs, and to demonstrate that contribution through planning conditions and legal obligations.
- Commitments to avoid loss of designated conservation sites and irreplaceable habitats are necessary, but should be accompanied by robust, legally enforceable buffer zone requirements. The current drafting lacks the necessary specificity.

Taken together, the SEA's mitigation framework reads as a set of aspirations rather than obligations. For developments of this scale and irreversibility, aspiration is not sufficient, especially given the legal imperatives for nature recovery.

3. Recommendations to go further and deliver 'nature positive' new towns:

New towns should be anchored by bold, clear, and binding commitments for nature. The following measures should be embedded in the policy framework for all the proposed new towns:

BNG:

- A mandatory minimum of 30% BNG for all new town developments, regardless of site type, with no exemptions applicable.
- Onsite BNG delivery should be prioritised, and any off-site measures should be delivered at a strategic landscape and catchment scale wherever possible, subject to rigorous, verifiable standards.
- Mandatory independent monitoring of BNG delivery over the lifetime of developments, with enforceable remediation requirements where gains are not achieved.

Greenspace standards:

- A minimum of 30% green space across all new town developments, including high-quality, accessible and biodiverse open space, such as wildflower-rich road verges and areas of grassland green spaces. Any new communal green spaces created as part of this requirement should be registered as town or village green so it is provided permanent protection from future development.
- A park or equivalent high-quality natural green space within every neighbourhood, meeting Natural England's Accessible Natural Greenspace Standard (ANGSt)⁵: no resident to be located more than 300 metres from the nearest natural green space of at least 2 hectares, and at least 1 hectare of Local Nature Reserve provision per 1,000 population.
- Include meaningful blue space provision, including where appropriate the restoration or creation of rivers, streams, ponds, and wetlands. Mandatory sustainable urban drainage systems and sufficient provisions for their maintenance designed to maximise ecological and wellbeing value..

Tree canopy cover and urban greening targets

- A target of 20-25% tree canopy coverage should be in place for each new town, in line with evidence-based standards for urban climate resilience and nature recovery.⁶ A long term aim should be for all urban communities to have at least 30% canopy cover as part of the 3+30+300 rule promoted by the International Union for Nature Conservation (IUCN). The rule indicates that every resident should be able to see at least three mature trees from where they live and work, enjoy at least 30% equitable tree canopy cover at the neighbourhood level and be no more than 300m from a publicly accessible green space.⁷
- Additionally, a target Urban Greening Factor score of 0.5 to be required for all new town developments, consistent with Natural England's recommendations for garden communities.⁸
- There should be an explicit policy prioritisation of the retention of existing trees to prevent pre-emptive felling. This is particularly important for long established, large canopy trees,

⁵ <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/AccessibleGreenspaceStandard.aspx>

⁶ <https://www.designcouncil.org.uk/fileadmin/uploads/dc/Documents/what-makes-an-eco-town.pdf>

⁷ [Promoting health and wellbeing through urban forests – Introducing the 3-30-300 rule - IUCN Urban Alliance](#)

⁸ <https://publications.naturalengland.org.uk/publication/5846537451339776>

those protected under a Tree Preservation Order system, and trees in priority habitats over the planting of new saplings.⁹

- All new planting should explicitly prioritise locally sourced native tree species, vegetation, and wild plants, chosen with reference to climate resilience, the character of the surrounding natural landscape, the relevant Local Nature Recovery Strategy, and any applicable local Biodiversity Action Plans.
- We commend the ambition of Forestry Commission and Natural England to make new forest towns surrounded by 1000 hectares of new woodland.¹⁰ However, it is also important that the design of the new towns protects existing woodlands, especially Ancient Woodlands, Ancient Wood Pasture and Ancient and Veteran trees.

Nature-friendly design features as standard

- Nature-friendly design features should be required as standard across all new town buildings and infrastructure, including swift bricks, hedgehog highways, and other provisions identified in established nature-friendly design guidance.
- Nature-positive design codes and planning conditions should require biodiversity integration at the building level, not merely at the masterplan scale, produced in line with the recommendations of and templates from the Cracking the Code project.¹¹
- Nature-friendly drainage infrastructure should be incorporated into new town design, including consideration of sustainable drainage systems (SuDS) and the design of gully pots and kerbs to minimise impacts on migrating wildlife, notably amphibians.

Buffer zones for Protected Sites:

- Mandatory buffer zones of at least 50-100 metres between new development and key vulnerable or protected sites (including ancient woodland and ancient wood pasture), with larger buffers of up to 500 metres required adjacent to internationally designated sites (SACs, SPAs, Ramsar sites) and SSSIs, informed by site-specific ecological assessment and Natural England guidance on recreational disturbance impacts.¹²
- Habitats Regulations Assessment should be carried out at the earliest possible stage for all new town locations, with unresolved adverse effects on internationally designated sites treated as a material constraint on the location and scale of development.

Local Nature Recovery Strategy (LNRS) alignment

⁹ Following British Standard 5837 ([BS_5837_2005.pdf](#)) and Natural England standing advice ([Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK](#))

¹⁰ <https://www.gov.uk/government/news/new-national-forest-in-the-oxcam-corridor-moves-a-step-closer?utm> ; <https://www.gov.uk/government/news/nation-to-benefit-from-two-new-national-forests-backed-by-1-billion-investment-in-tree-planting> ; <https://www.theguardian.com/environment/2025/nov/05/new-set-of-forest-towns-to-be-built-between-oxford-and-cambridge>

¹¹ <https://www.lda-design.co.uk/kindling/news/cracking-the-code/>

¹² <https://publications.naturalengland.org.uk/publication/6105140258144256>

- All new towns should be required to align with and actively contribute to the delivery of their relevant Local Nature Recovery Strategy, including through financial contributions and land management agreements where applicable.
- New town masterplans should map contributions to the Nature Recovery Network and demonstrate connectivity with existing green and blue infrastructure at the landscape scale.
- Clear monitoring, reporting and enforcement frameworks for environmental outcomes should be established to ensure promised mitigation erasures are delivered in practice.

The scale, visibility, and longevity of new towns mean they will define the relationship between housing development and nature recovery for a generation. The mitigation measures currently proposed in the SEA report do not reflect the urgency or the opportunity of that context. We urge the government to replace the current framework of vague aspirations and minimum statutory compliance with a bold, binding, and monitored set of commitments, positioning new towns as genuine exemplars of nature-positive development, and that give statutory force to England's commitments to halt and reverse biodiversity decline. Anything less risks locking in an approach that falls well short of what the ecological emergency demands, and what the public rightly expects from the most significant planned development programme in decades.

Question 12

Do you have any other feedback on the SEA report, including the issues and effects identified therein?

No.

Section 3.3: Proposed New Town locations

Question 13

Do you think the 7 locations proposed for the new towns programme are the ones most likely to meet the programme's objectives?

(Yes/No/Not sure)

If no, please set out why you think the proposed locations do not meet our objectives.

Not sure.

Section 4.1 - Government offer

Question 14

Do you agree with the overall government offer for proposed new town locations?

(Yes/No/Not sure)

If you answered no, is there any additional support you think should be offered?

N/A

Question 15

Do you think there are any additional interventions that government should consider to ensure design and placemaking quality in new towns?

(Yes/No/Not sure)

If you answered yes, please set out the additional interventions government should consider.

Yes.

We are supportive of the ambition for ecologically appropriate, purposely planted forest to surround any new towns in the Ox-Cam corridor.¹³ Natural England and the Forestry Commission are supportive of planting at least 1,000 hectares of new woodland around a new town, with benefits for biodiversity as well as for community wellbeing and connection to nature.¹⁴ Sites for planting a new woodland should join up or extend existing fragments of woodland, particularly ancient woodland, and take account of landscape features.

Section 4.2 - New Towns planning policy

Question 16

How clear do you find the proposed planning policy?

If you answered unclear, which elements are unclear and how would you suggest changing them?

Unclear.

We find the proposed planning policy unclear in how it relates to the environmental and nature recovery obligations that must apply to settlements of this scale. New towns of 10,000 homes or more will represent significant and permanent land use changes, and so the environmental policies that govern them must be proportionately robust and ambitious. As currently drafted, the planning policy is unclear and inconsistent regarding the Government's own statutory commitments, and creates real risks of poor environmental outcomes at scale. The policy is thin on environmental substance and heavily focused on development facilitation. The framing is almost entirely about unlocking housing delivery, and the word "nature" appears once, inside a single placemaking principle. Given the legal and national security imperatives for nature recovery, this is a significant omission. This policy is an early opportunity to embed stronger nature-positive requirements. However, if left unchanged, it risks new towns becoming large-scale ecological liabilities with minimal or token green space.

¹³ [https://www.gov.uk/government/news/new-national-forest-in-the-oxcam-corridor-moves-a-step-closer?utm](https://www.gov.uk/government/news/new-national-forest-in-the-oxcam-corridor-moves-a-step-closer?utm_source=twitter&utm_medium=social) ; <https://www.theguardian.com/environment/2025/nov/05/new-set-of-forest-towns-to-be-built-between-oxford-and-cambridge>

¹⁴ <https://committees.parliament.uk/oralevidence/17318/html/>

We have significant concerns in the following areas:

1. The environmental sustainability placemaking principle is unclear and unenforceable

The environmental sustainability principle states that new towns should "*help to protect, restore and enhance biodiversity.*" This language reproduces a standard formulation without adding meaningful planning policy content. It does not specify what level of Biodiversity Net Gain (BNG) or other enhancements are required, how biodiversity outcomes will be monitored, or how compliance with the principle will be assessed at masterplan stage. It does not reference Local Nature Recovery Strategies, despite these being statutory plans specifically designed to direct nature recovery spatially across England. It does not require masterplans to demonstrate compatibility with, or contribution to, the relevant LNRS for each location.

The SEA Environmental Report acknowledges that "*the scale of proposed development will have an impact on biodiversity, flora and fauna*" and flags potential mitigation through statutory BNG and other potential '*opportunities*'. However, the planning policy sets no positive BNG target beyond the statutory minimum of 10% and provides no steer on the greater levels of nature-enhancement ambition which new towns should aspire to and deliver. The statutory minimum for BNG is not sufficient. For settlements of this scale and environmental impact, the policy should specify a minimum BNG target of at least 30%, include specific nature-positive policies such as an urban greening factor requirement, tree canopy cover targets etc, mandate that masterplans include specific nature-positive design and are aligned to the relevant LNRS.

2. The Green Belt decision-making policy creates an unqualified environmental presumption

The draft policy states that where new town development in the Green Belt would constitute inappropriate development, it is "likely" that this would constitute the very special circumstances to justify it. This creates, in effect, a near-automatic presumption in favour of Green Belt release for designated new towns, with no accompanying environmental conditionality. This is both unclear as policy (since "likely" sets no threshold and invites litigation) and inconsistent with the Government's stated intentions to deliver nature recovery, climate resilience, and access to nature.

Any Green Belt release must be matched with explicit nature recovery requirements and that land value uplift should be captured and directed towards ecological enhancement. The draft policy should be amended to make clear that where new town designation involves Green Belt release, a higher BNG requirement applies, that land value capture mechanisms must include a dedicated nature recovery fund, and that any released land that is of high ecological value, including Local Wildlife Sites and sites containing priority habitats, cannot be treated as general development land.¹⁵

¹⁵ https://www.wcl.org.uk/docs/Link_briefing_Improving_Green_Belt_for_nature_Dec2024.pdf

3. The "healthy and safe places" principle provides no meaningful access to nature standard

The principle that new towns should have "easily accessible green spaces and recreational facilities" is not supported by a robust specification of what "easily accessible" means in practice. There is no specific reference to the accessible natural greenspace standards developed by Natural England, no requirement for connectivity to wider green infrastructure networks and rights of way, and no standard for the quality or biodiversity value of the green space that must be provided. This creates a real risk that residual land left over after development is designated as "green space" with no ecological value and no genuine contribution to residents' health or access to nature, which could then laterally become designated as 'brownfield' and exempt from further BNG requirements and safeguards.

Equitable access to quality green space is a health and social justice issue, not merely an amenity one. To ensure good quality development, the policy should specify minimum green space standards, for both quality and quantity, and require that green space is strategically planned as part of masterplans, rather than as residual land, and require connectivity with existing public rights of way networks and wider green infrastructure, such as village greens and public parks.

The stewardship principle requires "clear governance and funding structures to manage and maintain communal assets over the long term" but does not define whether natural assets i.e. green and blue infrastructure, biodiversity features, on-site habitat etc, are included within "communal assets" or specify who holds responsibility for their ongoing management. Long-term stewardship of nature on new town sites is not guaranteed by BNG alone, which focuses on habitat creation but does not mandate management governance for the lifetime of a development. The policy should explicitly require that stewardship models include named responsibilities for managing green and natural assets, with ring-fenced funding, monitoring obligations, and reporting against biodiversity and access outcomes.

In addition, we recommend the following specific changes to the planning policy:

- Add an explicit statement that all statutory environmental protections apply in full to new town development, that the mitigation hierarchy takes precedence, and that the policy does not disapply or modify any requirements under the Environment Act 2021, Habitats Regulations, or Natural Environment and Rural Communities Act 2006.
- Amend the healthy and safe places principle to require: (a) a minimum of 30% green space across all new town developments, including high-quality, accessible and biodiverse open space; (b) green space provision that meets Natural England's Accessible Natural Greenspace Standard, with no resident located more than 15 minutes walk from the nearest natural green space of at least 2 hectares, and at least 1 hectare of Local Nature Reserve provision per 1,000 population; (c) meaningful blue space provision, including sustainable urban drainage systems designed and maintained to maximise ecological and wellbeing value, and where appropriate

the restoration or creation of rivers, streams, ponds and wetlands; and (d) connectivity with existing public rights of way networks and wider green infrastructure.

- Require nature-friendly design as a standard condition across all new town buildings and infrastructure, including swift bricks, hedgehog highways, and other provisions identified in established nature-friendly design guidance. Design codes and planning conditions should require biodiversity integration at the building level, not merely at the masterplan scale.
- Amend the environmental sustainability placemaking principle to require: (a) a minimum BNG target of 30% for new town developments; (b) a requirement that masterplans include a nature recovery plan aligned to the relevant Local Nature Recovery Strategy; and (c) clear biodiversity monitoring and reporting requirements as part of stewardship obligations.
- Require a target of 20–25% tree canopy coverage for each new town, in line with evidence-based standards for urban climate resilience and nature recovery, or an equivalent Urban Greening Factor score consistent with established eco-town design guidance. Policy should explicitly prioritise the retention of existing trees to prevent pre-emptive felling. This is particularly important for long established, large canopy trees, those protected under a strengthened Tree Preservation Order system, and trees in priority habitats over the planting of new saplings, and require that all new planting prioritises locally sourced native species chosen with reference to the relevant LNRS and local Biodiversity Action Plans.
- Amend the Green Belt decision-making policy to make clear that Green Belt release for new towns must be accompanied by: (a) a higher BNG requirement; (b) explicit exclusions for land of high ecological value, including Local Wildlife Sites and priority/irreplaceable habitats; and (c) requirements that land value capture includes a dedicated nature recovery component.
- Require mandatory buffer zones of at least 50–100 metres between new development and key vulnerable or protected sites, with larger buffers of up to 500 metres required adjacent to internationally designated sites (SACs, SPAs, Ramsar sites) and SSSIs, informed by site-specific ecological assessment and Natural England guidance on recreational disturbance impacts. Habitats Regulations Assessment should be carried out at the earliest possible stage for all new town locations, with unresolved adverse effects on internationally designated sites treated as a material constraint on the location and scale of development.
- Amend the stewardship principle to explicitly include natural assets within the scope of communal assets and require that stewardship governance includes named accountability, ring-fenced funding, and regular reporting for biodiversity and access outcomes.

New towns are a historic opportunity to demonstrate genuinely nature-positive development at scale. As currently drafted, the planning policy does not help achieve this. We urge the Government to strengthen the policy in the ways set out above before the programme is adopted.

Question 17

Do you think establishing the placemaking principles in the proposed planning policy is an effective way to implement the placemaking ambition of the programme?

(Yes/No/Not sure)

If you answered no, how do you think the placemaking principles should be implemented?

No.

We welcome the topics and inclusion of the placemaking principles in the planning policy. However, new towns are of such an order of significance, in terms of land use change, that they must be governed by principles that go beyond the minimum standards applicable to ordinary development. As currently drafted, the environmental principles are effectively weak aspirational statements with minimal ambition, rather than enforceable policy. Without significant revision, they are unlikely to deliver the placemaking ambition or development quality the Government has said it is committed to.

Aspirational principles without specified standards, defined thresholds, or enforceable mechanisms risk failure to translate reliably into outcomes on the ground. This was key within the rationale behind the introduction of mandatory, measurable biodiversity net gain requirements.¹⁶ The scale of new towns makes this risk particularly serious.

We therefore do not consider that embedding the current principles in planning policy is sufficient. We recommend the following changes to the way the principles are implemented.

- 1. Minimum standards should be specified for each principle with an environmental dimension.** Currently, the only principle, with a numerical target relates to affordable homes. Given the legal status of our nature recovery targets, the environmental sustainability, healthy and safe places, and stewardship principles should each be accompanied by minimum quantified standards. As set out in our response to Question 16, this should include a mandatory 30% BNG requirement, a 30% green space minimum, adherence to Natural England's Accessible Natural Greenspace Standard, a 20–25% tree canopy coverage target, suitable buffer zones to important and protected habitats, and an Urban Greening Factor requirement. Without these minimum standards, the principles do not provide no clear basis for delivering new towns in line with the programme's stated ambitions, and the requirements of the statutory Environment Act targets.
- 2. Masterplan requirements should be strengthened and made more specific.** The policy requires masterplans to reflect the placemaking principles and relevant national guidance, but does not specify what a compliant masterplan must contain in relation to nature and green space. Masterplans for all new town locations should be required to include: a nature recovery plan aligned to the relevant Local Nature Recovery Strategy; a green infrastructure strategy demonstrating landscape-scale connectivity with access to nature shown to be no more than a 15 minute walk for every resident within the settlement boundary; a tree canopy strategy;

¹⁶ https://consult.defra.gov.uk/land-use/net-gain/supporting_documents/181121%20%20Biodiversity%20Net%20Gain%20Consultation%20IA%20FINAL%20for%20publication.pdf

a sustainable drainage strategy with explicit ecological and wellbeing objectives; and a biodiversity monitoring and enforcement framework.¹⁷ These should be statutory requirements, not advisory best practice, and should be subject to independent examination before adoption.

3. **The New Towns Place Review Panel should have an explicit nature recovery remit.** The government offer includes establishing a Place Review Panel to provide impartial advice on placemaking. We strongly support this, but the panel's remit should include statutory nature conservation, as well as expertise within the membership, and should be required to assess masterplans against more robust environmental placemaking principles, reporting publicly on whether proposals meet the standards set out above.
4. **Stewardship models must include enforceable long-term obligations for natural assets.** The stewardship principle as currently drafted provides no guarantees that green infrastructure, biodiversity features, and accessible green space will be maintained in perpetuity. Stewardship governance frameworks for new towns should be required to include ring-fenced funding for natural asset management, named accountability for biodiversity and green space outcomes, and mandatory reporting against the environmental placemaking standards on at least a five-year cycle. Where monitoring shows that outcomes are not being achieved, enforceable remediation requirements should apply.
5. **LNRS alignment should be a condition of new town designation, not just a consideration at masterplan stage.** As currently structured, the policy does not require new town proposals to demonstrate compatibility with Local Nature Recovery Strategies until master planning begins. Given that some proposed locations lie in areas where LNRSs are already published or in preparation, LNRS alignment should be a prerequisite of designation, not a downstream consideration. This would ensure that the strategic nature recovery framework for each area shapes the location, layout, and ambition of new towns from the outset, rather than being retrofitted to a development footprint that has already been fixed.

With clear minimum standards, enforceable masterplan requirements, independent scrutiny, and long-term accountability, the placemaking principles could anchor a genuinely nature-positive programme. Without these changes, they risk becoming a vague statement of intent that is systematically under-delivered. We urge the Government to move from principles to specific enforceable policy before the programme is adopted.

¹⁷ https://www.lda-design.co.uk/wp-content/uploads/CrackingtheCode_March2022.pdf

Question 18

Do you think the proposed planning policy provides sufficient flexibility to new town locations to meet the placemaking principles?

(Yes/No/Not sure)

If you answered no, what other measures could create a flexible approach to the placemaking principles?

Not sure

Our main concern with the proposed policy is not that it lacks ‘sufficient’ flexibility, but that it offers too much in the wrong places, and therefore represents a risk to nature recovery. Flexibility is only appropriate where there is also a clearly defined floor of robust minimum requirements. Without this, ‘flexibility’ risks becoming simply a mechanism for under-delivery and de-facto regression.

As set out in our responses to Questions 16 and 17, the placemaking principles as drafted lack the specified minimum standards, enforceable requirements, and independent scrutiny mechanisms needed to ensure consistent outcomes. In that context, additional flexibility risks compounding rather than solving the problem and environmentally regressive outcomes.

The consultation suggests that some locations will be more able than others to meet certain placemaking targets, for example affordable housing minimum may need to flex according to local conditions, such as the volume of development on brownfield land. This context-sensitivity is sometimes appropriate, however, the principles as drafted extend this logic implicitly to environmental standards, with no minimum environmental floor. The ecological and climate impacts of large-scale development are not reduced because a site happens to be in an economically constrained area or is predominantly brownfield. Ambitious Environmental standards, i.e. ambitious BNG requirements, green space provision, tree canopy targets, buffer zones around protected sites etc, must apply universally – given the statutory status of our nature recovery obligations. The Government should make explicit that environmental placemaking standards are non-negotiable minimums, not aspirational targets to be traded away.

As noted in our response to Question 16, the draft policy creates a near-automatic presumption that new town designation constitutes very special circumstances for Green Belt development. The consultation document frames this as providing clarity and flexibility for local planning authorities. However, our concern is that this flexibility operates entirely on the side of development facilitation, with no counterbalancing flexibility for local authorities or statutory bodies to impose higher environmental requirements in response to the specific ecological sensitivities of Green Belt land being released. Where Green Belt land contains Local Wildlife Sites, priority habitats, ancient woodland, or land identified in a Local Nature Recovery Strategy as important for nature recovery, the policy provides no mechanism for these factors to constrain or condition the development presumption. This asymmetry, maximum flexibility for development, minimum flexibility for

environmental protection, represents a significant risk to achieving nature positive development, and risks associated new towns having a negative impact on reaching our legal nature recovery goals.

The policy requires new town development to be consistent with emerging or adopted masterplans and design codes, but provides flexibility where these are not yet in place. We are concerned that this creates a window during which significant development decisions, including decisions about land use, infrastructure corridors, and development boundaries, could be taken before masterplans incorporating robust environmental standards have been prepared or examined. The Government should make clear that no significant development consent or land assembly decision within a new town area should proceed ahead of an adopted masterplan that has been independently assessed for compliance with the environmental placemaking standards and statutory objectives.

However, we do not oppose all flexibility in how the placemaking principles are *implemented*. It is reasonable that the specific mix of habitats created under BNG, the precise configuration of green space, or the species composition of tree planting and appropriate spacing should reflect local ecological conditions and best practice, the relevant Local Nature Recovery Strategy, and site-specific constraints. Implementation flexibility, i.e. flexibility in *how* a standard is met, not *if* it is met, is appropriate and ecologically beneficial. It is entirely consistent with setting ambitious requirements, such as 30% BNG, whilst allowing masterplans to determine how those standards are met in ways that reflect local character and ecological priorities.

We urge the Government to reframe its approach to flexibility and ensure that it reflects ambitious minimum standards with flexible implementation, rather than flexible principles with discretionary delivery. This would provide the certainty that communities, statutory bodies, and nature organisations need to be confident that the next generation of new towns will genuinely contribute to our nature recovery targets, and the site-level flexibility that developers and local authorities need to respond to local conditions in achieving these outcomes.

Question 19

Is establishing a 40% target for affordable housing an effective way of delivering an ambitious number of affordable homes?

(Yes/No/Not sure)

If you answered no, what changes to the target are needed?

Not sure

Question 20

Is the proposed planning policy on giving substantial weight in decision making to the social and economic benefits of new towns clear?

(Yes/**No**/Not sure)

If you answered no, please provide your reasons.

No.

We do not agree that proposed policy is sufficiently clear in terms of the interaction with the UK's legally binding nature recovery obligations. While it states that "substantial weight" should be given to the social and economic benefits of new towns, it does not define how this weighting should be duly balanced against other considerations such as environmental constraints and the need to protect and enhance nature. Likewise, it is a significant, worrying omission that no equivalent weighting is assigned to environmental benefits considerations, and the environmental sustainability placemaking principle is aspirational and unquantified. This is particularly concerning given the legal status of environmental targets and obligations.

This represents a concerning imbalance where environmental considerations are increasingly framed as weaker than development delivery objectives, creating scope for environmental degradation through incremental decision-making, rather than an equal pillar of sustainable development. This is not acceptable as the statutory environmental obligations that apply to new town development, under the Environment Act 2021 etc, are not discretionary policy aspirations, they are legally binding commitments. A decision-making policy that assigns explicit weight to social and economic benefits while leaving environmental obligations to be inferred from a cross-reference to the NPPF does not accurately reflect the legal status of those obligations, and risks producing decisions in which environmental harms are routinely judged to be outweighed rather than genuinely avoided.

This lack of clarity and emphasis risks creating an overriding presumption in favour of development for short-term socio-economic reasons that risks significant long-term environmental harm. The policy should be amended to give equivalent, explicit weight to environmental benefits in decision-making and to clarify that the mitigation hierarchy must be applied, and significant environmental harm avoided. As drafted, this sequencing is absent, rendering the policy unclear and likely to lead to poorer environmental outcomes in practice. Without clearer criteria or guidance, there is a risk of inconsistent and potentially harmful interpretation, undermining confidence in the planning system and resulting in worse outcomes for both communities and the natural environment. Greater clarity is needed on how "substantial weight" should be applied, including explicit recognition of the equal importance of environmental considerations and alignment with the mitigation hierarchy.

Question 21

Do you agree with the government's approach to decision making policy on the Green Belt?

(Yes/**No**/Not sure)

If you answered no, what further change to plan-making or decision-making policy are needed?

No.

We do not agree with the proposed approach. The draft policy creates a near-automatic presumption that new town designation constitutes very special circumstances justifying inappropriate development in the Green Belt for some of the proposed building locations.

Green Belt release must be accompanied by meaningful environmental conditionality, rather than an automatic consequence of housing designation. The proposed approach provides no such conditionality. It does not directly acknowledge, or factor-in, the ecological value of land being released, and, for example, contains no exclusions for Local Wildlife Sites, priority habitats, or land identified in a Local Nature Recovery Strategy as important for nature recovery, and no requirement that land value uplift from Green Belt release is captured and directed towards ecological enhancement or implementing green infrastructure.

The policy should be amended to make clear that where new town designation involves Green Belt release, land of high ecological value, including Local Wildlife Sites, ancient woodland, priority habitats, and land identified in the relevant LNRS, cannot be treated as general development land and must be subject to explicit protection. Green belt release should be accompanied by a higher mandatory BNG requirement, and land value capture mechanisms with a ring-fenced nature recovery component, reinvested in ecological enhancement within and around the released area.¹⁸ The statutory minimum BNG requirement is not sufficient.

Without these changes, the Green Belt policy risks delivering large-scale ecological loss under a development presumption, with no enforceable mechanism to ensure that nature recovery keeps pace with housing delivery.

Question 22

Do you think the proposed planning policy is sufficient for the purposes of safeguarding land for development as new towns.

(Yes/No/Not sure)

If you answered no, how could the policy go further?

N/A

Question 23

Do you think any additional planning policies are needed to support the delivery of the programme objectives?

(Yes/No/Not sure)

If you answered yes, please provide details.

¹⁸ https://www.wcl.org.uk/docs/Link_briefing_Improving_Green_Belt_for_nature_Dec2024.pdf

Yes.

The proposed planning policy, as currently drafted, is insufficient to deliver new towns that genuinely meet the Government's own placemaking ambitions, and that additional policy is needed to remedy significant gaps in the environmental and nature recovery requirements. Our concerns across previous responses set out the specific deficiencies in detail, i.e. the absence of minimum environmental standards, the lack of explicit weighting for environmental considerations in decision-making, the unqualified Green Belt presumption, and the failure to embed LNRS alignment, robust BNG requirements, or enforceable green space standards and guarantees of access to nature in the policy framework. Taken together, these gaps mean that the current policy could preside over large-scale, permanent land conversion with no enforceable guarantee that the environmental placemaking principles, and crucially, any nature enhancements, will be delivered in practice.

The eco-towns programme, launched under the last Labour government in 2007–08, was underpinned by a dedicated Planning Policy Statement that established a genuinely higher bar for new settlements. Eco-towns were rightly expected to demonstrate exemplary performance across climate, environmental, and social objectives before receiving consent. New flagship settlements of this scale and permanence should rightly only proceed where they can demonstrate genuinely exemplary standards, not merely compliance with the general development framework. That programme was subsequently abandoned by the Coalition Government, which removed the bespoke policy framework and with it the higher-bar model that gave it environmental credibility. This Government now has the opportunity, and the mandate, to do better than its predecessors: to match previous ambition for genuinely exemplary new settlements, and to go further by embedding the stronger statutory environmental framework and duly reflect the stronger legal imperatives that now exists under the Environment Act 2021.

We call for a dedicated New Towns Environmental Policy Statement, to sit alongside the planning policy set out in Annex A, and provide the environmental substance and ambition it currently lacks.

This should establish, as mandatory and non-negotiable requirements for all new town locations, the standards Link has set out across our consultation responses: a minimum 30% BNG target with no exemptions; a 30% green space standard meeting Natural England's Accessible Natural Greenspace Standard ensuring that all new residents are no more than 15 minutes walk to a natural landscape; a 20–25% tree canopy coverage target; mandatory LNRS alignment from the point of designation; buffer zones around protected and sensitive sites; nature-friendly design standards at the building level; and long-term stewardship governance with explicit accountability for natural assets. It should also remedy the fundamental imbalance in the decision-making policy by being given equivalent weight to the social and economic factors, which the current policy already assigns substantial weight.

The current framework, with its aspirational principles, minimal-to-no environmental ambition, and development-weighted decision-making, will not deliver exemplar outcomes or truly sustainable development in line with achieving legal environmental targets. A dedicated environmental policy statement, modelled on the higher-bar approach of the original eco-towns programme but updated to reflect the current statutory environmental framework and associated legal obligations would give this programme the credibility and enforceability it needs to fulfil that promise.

Question 24

Do you have any views on the potential impacts of the New Towns Draft Programme on people or groups with protected characteristics?

N/A

Question 25

Is there anything else you would like to tell us that you think is relevant to this consultation but has not been covered in previous questions?

N/A

Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 97 organisations to use their joint voice for the protection of the natural world and animals.

For questions or further information please contact:

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The following organisations have inputted into, and support this response.

Ancient Tree Forum (ATF)

Open Spaces Society

The Mammal Society

Froglife

Plantlife

CPRE – the Countryside Charity

Amphibian and Reptile Conservation (ARC)

Bat Conservation Trust (BCT)

RSPB

Woodland Trust