



## National Planning Policy Framework Consultation

The Natural Capital Committee welcomes the opportunity to comment on the National Planning Policy Framework consultation document. It is essential that effective environmental protection and improvement measures are incorporated into spatial planning guidance and requirements if the government's stated intent of this being the first generation to leave the environment in a better state than the one it inherited is to be realised.

The NCC welcomed the publication in January 2018 by government of 'A Green Future: Our 25 Year Plan to Improve the Environment'. Chapter 1 of the 25 year plan outlines the government's commitment to using and managing land sustainably including:

- We will embed an 'environmental net gain' principle for development, including housing and infrastructure.
- We want to put the environment at the heart of planning and development to create better places for people to live and work.
- We will seek to embed a 'net environmental gain' principle for development to deliver environmental improvements locally and nationally.
- We want to establish strategic, flexible and locally tailored approaches that recognise the relationship between the quality of the environment and development. That will enable us to achieve measurable improvements for the environment – 'environmental net gains' – while ensuring economic growth and reducing costs, complexity and delays for developers.
- Current policy is that the planning system should provide biodiversity net gains where possible. We will explore strengthening this requirement for planning authorities to ensure environmental net gains across their areas and will consult on making this mandatory – including any exemptions that may be necessary.
- In future, we want to expand the net gain approaches used for biodiversity to include wider natural capital benefits, such as flood protection, recreation and improved water and air quality.
- **New development will happen in the right places**, delivering maximum economic benefit while taking into account the need to avoid environmental damage. We will

protect ancient woodlands and grasslands, high flood risk areas and our best agricultural land.

- **High environmental standards for all new builds.** New homes will be built in a way that reduces demands for water, energy and material resources, improves flood resilience, minimises overheating and encourages walking and cycling. Resilient buildings and infrastructure will more readily adapt to a changing climate.

The National Planning Policy Framework consultation provides an ideal opportunity to embed the government's net environmental gain proposals outlined in the 25 year plan (as summarised above) within the planning framework. As currently drafted, Section 15 of the framework, which focuses on conserving and enhancing the natural environment, does not fully reflect the commitments made in the 25 year plan on net environmental gain. The NCC considers that to reflect properly the statements in the 25 year plan:

- references to net biodiversity gain (for example in paragraphs 168, 172 and 173) should be extended to read "net biodiversity and natural capital (environment) gain" in all instances; and
- mechanisms for, or requirements on, local authorities to co-operate need to be made explicit to ensure that the policy (in paragraph 169) for the enhancement of natural capital at a catchment or landscape scale - across local authority boundaries - is implemented consistently by all authorities.
- In paragraph 173 further clarification or criteria should be given by which to interpret the "unless" statements and exception tests so that development in such areas - or impacting on the designated habitats - is truly unavoidable and exceptional.

**Dieter Helm**