

Planning Reform Working Paper



28th February 2025

Planning Reform Policy Team
planningcommittees@communities.gov.uk

Dear Planning Reform Policy Team,

Response from the Buckinghamshire and Milton Keynes Natural Environment partnership

On behalf of the Buckinghamshire and Milton Keynes Natural Environment Partnership (the NEP), the area's Local Nature Partnership (LNP), we welcome the opportunity to respond to the recent [Planning Reform Working Paper](#). The NEP works across the public, private, conservation, and other sectors in the area to facilitate nature restoration, and has led the recent work to produce the area's draft Local Nature Recovery Strategy, currently out for public consultation.

We have set out below the NEP's views in respect of your **question g), replicated below:**

g) Are there any other matters that you think we should be aware of if these proposals were to be taken forward, in particular to ensure they provide benefits for development and the environment as early as possible?

The NEP welcomes the overall objective to ensure positive gains for both nature restoration and planning.

However, in respect of your question g, we would like to make the following key points that we think need clarifying or put in place to help to deliver more effectively for nature and sustainable growth concurrently:

- **Local Nature Recovery Strategies (LNRs) and the proposed Delivery plans**
We would welcome further clarification about the link between the nature recovery priorities and measures and their locations, being suggested in the upcoming Local Nature Recovery Strategies, and their use in any single Strategic Assessment and

Delivery Plan. i.e. it should be made clear how, and which specific aspects of LNRs, should be depended upon.

- **Clarification of involvement in producing the Delivery Plans**

We would welcome further information and detail about which organisations / expertise is expected to be involved in drawing up the proposed Delivery Plans. We would like to see local expertise, drawn together perhaps via existing Local Nature Partnerships and their networks, involved in developing such a Plan. Based on experience with leading the work on our LNRs, we would press that developing the Plan must also be sufficiently resourced to allow the skills, expertise, capacity and collaboration required to produce a well-developed and supported Delivery Plan.

- **Delivery Bodies to include specific reference to Local Nature Partnerships**

We would like to see the delivery bodies mentioned in the Working Paper to be clearly defined and include a clear reference to making use of Local Nature Partnerships (LNPs).

LNPs would have a key role in drawing conservation organisations and others together to work at scale, disseminate understanding, build partnerships, share good practice and facilitate collaboration, identify a pipeline of projects and connect funders to providers.

LNPs would be able to harness local experts, and, with provision of sufficient funding to facilitate, support and enable delivery of the relevant strategic delivery plans (particularly around requirements of the LNRs).

- **Links with devolution proposals**

We would also welcome further clarification as to how the proposed development levy to build a Nature Restoration Fund links with the recent devolution proposals.

For example, we would welcome the local operation of any Nature Restoration Funds, for example at the scale of the proposed Strategic Authority at least, and suggest these funds are built up and spent locally (subject to our points below) – and to encourage larger-scale projects working across administrative borders as well as local nature projects within them.

- **Operation of the proposed Nature Restoration Fund**

We believe the new Nature Restoration Fund must be carefully structured to safeguard the alignment of growth and nature restoration – rather than create a decoupling. In particular, we would like to see focus on the Fund to safeguard:

- **Locality** - local impacts from development should be addressed by local nature restoration – i.e. to safeguard against the risk of an area affected adversely by development not receiving the benefits of nature-based funding – with the benefits being realised away from the locality of impact. We believe an element of local fund management should be integrated into the

structure of the Fund to help guard against this. This could be a role for LNPs.

- **Timing** – we would also like to see the Fund structure and operation work so that the impacts from development are timed with positive nature restoration outcomes – to guard against a mis-timing of negative impacts on nature from development v benefits being realised.
- **Fairness** – we note that developers coming forward with proposals at a point where the Delivery Plan is considered complete would not need to pay into the Nature Restoration Fund under the proposals. However, this may lead to some developers not properly compensating for losses they could cause to nature and its wider benefits consequences.

Instead, we would suggest that all developers should pay into an ongoing fund. After all, nature recovery and restoration is never complete. Where a Delivery Plan is deemed close to “completion”, we believe provision should be made in the final policy for a new, enhanced Delivery Plan, to continue the journey to nature recovery.

- **Monitoring**

We would welcome a series of expectations or principles around requirements related to monitoring the impacts of the Nature Restoration Fund, with provision for how such activities and enforcement of them, should be funded. E.g. could monitoring of the impacts of spend by the Fund also be funded via the Nature Restoration Fund?

- **Clarity for BNG**

There is some concern over the implications of potentially moving away from the strict application of the mitigation hierarchy. It is crucial that harm to nature is avoided as a first priority, before mitigation and compensation is sought as a last resort. We would welcome this aspect to be part of any formal consultation on the proposals, along with any proposals for making use of habitat banks for wider purposes, as is suggested via some of the Working Paper and questions.

- **Further detail is needed**

Finally, we would welcome further detail on all aspects of the proposals and, given the potential impacts of the policy, a formal consultation so that each aspect can be properly considered and responded to more widely.

We would also welcome discussions about development of the proposals with England's network of LNPs (which could be arranged via Defra colleagues) for further engagement about how the proposals could work better at the local level. Many Local Nature Partnerships have been involved with the current Local Nature Recovery Strategy process and so have first-hand, recent as well as longer-term knowledge on partnership-working and have views on how best to deliver nature restoration locally.

Further, to reiterate that we believe that any new planning reforms should not come at the expense of existing protections for sites and species. New approaches and requirements for growth must take account of the need for a thriving and biodiversity natural environment – for example as evidenced in the Dasgupta Review and Natural England's State of Natural Capital Report. Our economy and society depend on the natural environment, as does our mental and physical health and wellbeing.

Summary

Overall, while the direction of travel implied in the Working Paper seems appropriate, in order to be successful, we would welcome specific and clear commitments to the following, so we can look towards a sustainable future:

- maintaining existing protections for habitats and species;
- the importance of operating the full sequence of the mitigation hierarchy;
- ensuring any mitigation or compensation takes place as close as possible to any negative impacts of development on nature in both time and place.

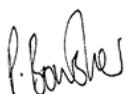
Above all, we would suggest specific reference is made to the role of **Local Nature Partnerships** in supporting the development and delivery of the proposed Delivery Plans, and in operating Nature Restoration Funds, with an element of locality included. We would be happy to arrange discussions with LNPs nationally about the proposals should you wish.

We also ask that the relationship between the Delivery Plans and LNRs in particular is specifically clarified, along with both how the impacts of the Fund will be monitored, and how the proposed Nature Restoration Fund might operate at scales linked to the recent devolution proposals.

Ultimately, nature recovery, growth and sustainable development can go hand in hand and this policy must be developed with that in mind. We would urge policymakers to take into account our key points in doing so, and to consider launching a formal consultation on proposals to allow all aspects to be properly considered and responded to more widely.

We would be happy to discuss any or all of the above if you wish.

Yours sincerely,



Phil Bowsher,
Chair, Buckinghamshire and Milton Keynes Natural Environment Partnership