

## Buckinghamshire and Milton Keynes Natural Environment Partnership



Philip Bowsher, Interim Chair  
23<sup>rd</sup> September 2024  
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Dear MHCLG Planning Policy Consultations Team,

The Buckinghamshire and Milton Keynes Natural Environment Partnership (the “NEP”) as the area’s Local Nature Partnership, welcomes the opportunity to provide a response to the NPPF consultation.

We bring together local authorities and organisations from across the public, private, health and education sectors, as well as conservation and community organisations to champion the value of the environment in decision-making and to encourage environmental protection and improvement for multiple benefits – for the environment, businesses and the economy, and the health and wellbeing of communities and the society of Buckinghamshire and Milton Keynes.

Our response to the NPPF consultation has been based on, and informed by, both draft responses from our partner organisations as well as the NEP’s key nature-based strategies and major areas of work, including our current role in leading the work, on behalf of Buckinghamshire Council, to produce our area’s Local Nature Recovery Strategy.

The NEP’s response is made without prejudice to any duly-made representations submitted separately and individually by any of our partner organisations of the LNP in response to the detail of the Government’s consultation, and the associated questions.

Our answers to specific questions are included at the Table below. However, in summary, our key areas of concern in respect of the proposed amendments to the NPPF are:

- **Chalk streams** – In light of the ongoing degradation of our precious chalk streams, we urge the Government to use the opportunity of its planning reforms to designate chalk streams and their catchments with a bespoke protection, integrated within the

National Planning Policy Framework. This protection should tackle direct harm and waste-water pollution.

- **Water resilience** - There needs to be action nationally on water companies in charge of wastewater networks, wastewater treatment works and sewerage discharge limits into watercourses. The planning system can only go so far to ensure there is sufficient infrastructure capacity for growth and arrangements put in place to control pollution.
- **Support for *delivering* Local Nature Recovery Strategies (LNRSs)** to maximise their potential; and related to this, the importance of supporting and **funding for Local Nature Partnerships** to enable strategic LNRS delivery across LNRS areas;
- **The importance of the final LNRS areas in allocating land** locally for, and assessing suitability for, development or for green energy;
- Related to this, **the need for urgent release of the guidance** due on the interpretation of “**have regard**” to the LNRS in local planning;
- **Stronger recognitions of the need for connecting people and nature** – with a requirement for developers to provide high quality, wildlife-rich green space on all development sites, and to ensure their appropriate long-term management and maintenance. This should include local community engagement and involvement, and so also promoting healthy living. An exemplar model for green space stewardship is the [Milton Keynes Parks Trust](#);
- **Strengthened protection for Local Wildlife Sites (LWSs)** – proposed amendments to the footnote 7 of the current NPPF. As LWSs are so significant for wildlife locally, they should also be protected from potentially damaging impacts of development. Their protection presents a huge opportunity to contribute towards the Government’s 30 by 30 ambition.
- **Land values** – support for benchmarking land value from or released into, the Green Belt, if a fair proportion of any funds raised were invested in measures of benefit to biodiversity and the environment, and to those that will facilitate public access to nature.

We also suggest further ways to strengthen **Biodiversity Net Gain, tackle climate change and protect existing green spaces.**


### **Sustainable Development**

Overall, we would also advocate that, to avoid a shift in the balance away from other aspects of sustainable development and wider place making, the NPPF should be underpinned by a robust definition of sustainable development that incorporates living within environmental limits; ensuring a strong, healthy and just society; and achieving a

sustainable economy, while promoting good governance and using sound science responsibly.

We would welcome any further discussions about any of the above points or our more detailed responses below, and would be grateful if you could please acknowledge receipt.

Best regards,

A handwritten signature in black ink, appearing to read 'P. Bowsher', written in a cursive style.

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

The Bucks and MK NEP’s detailed response to the NPPF consultation September 2024

NPPF consultation proposal reference	NEP’s response
<b>Chapter 3: Planning for the homes we need</b>	
<p><b>Paragraph 25</b> notes that cross-boundary strategic-scale planning is needed to plan for growth at scale.</p>	<p>Given that nature is a vital part of planning for growth, and also does not stop at administrative boundaries, we would request that this paragraph puts specific emphasis on the need to identify both restoring nature and delivering high quality green and blue infrastructure as key strands of <i>“delivering strategic infrastructure and improving climate resilience”</i>.</p> <p>We also agree that strategic planning will be important in the delivery of Local Nature Recovery Strategies (LNRs).</p> <p>We therefore suggest the following revised wording:  <i>“25. The Government was clear in its manifesto that housing need in England cannot be met without planning for growth on a larger than local scale, and that it will be necessary to introduce effective new mechanisms for cross-boundary strategic planning. This will play a vital role in delivering sustainable growth and addressing key spatial issues – including meeting housing needs, delivering strategic infrastructure (including high quality green and blue infrastructure) growing the economy, and improving climate resilience. Strategic planning and restoring nature will also be important in the delivery of Local Growth Plans and Local Nature Recovery Strategies.”</i></p>
<p><b>Q12 Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?</b></p>	<p>Paras 26 and 27 emphasise encouraging partnership working and greater collaboration between authorities.</p> <p>Given the proposed amendments above, the NEP would welcome as much emphasis on partnership-working to deliver LNRs as is given to encouraging partnership working to develop and agree Spatial Development Strategies (Para 26) and collaboration (Para 27).</p>

NPPF consultation proposal reference	NEP's response
<b>Chapter 5 – Brownfield, grey belt and the Green Belt</b>	
<b>Green belt and the LNRS (Q23 - Q36)</b>	
<p><b>Q23 Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?</b></p>	<p>The consultation considers whether sites identified in “draft or published Local Nature Recovery Strategies, that could become of particular importance for biodiversity” (Para 8) should be excluded from any definition of “grey belt”.</p> <p>The NEP is pleased that the importance of the LNRS and nature recovery has been recognised in the proposed new NPPF, which is largely focused on increasing the availability of land for housing and commercial opportunities.</p> <p>We support the suggestion that areas identified in the LNRS, that could become of particular importance for biodiversity, could be excluded from any definition of “grey belt”, which the proposals suggest could be released for development before any non-‘grey belt’ land in the Green Belt.</p> <ul style="list-style-type: none"> <li>▪ Under 191), add sub-clause 191d) to include ‘protect globally rare chalk streams from the impacts of pollution and habitat loss through adherence to a 50 metre ‘no development’ buffer zone along the riparian corridor’.</li> </ul> <p>The definition of “poor quality” grey belt land to be released from the Green Belt includes “Previously Developed Land” (PDL). We caution against an assumption that PDL cannot have a high environmental value. Whilst in many cases PDL may be suitable for redevelopment, PDL if it has been abandoned for a number of years can become home to a vast array of biodiversity and species, and in some cases may be classed as the Priority Habitat ‘open mosaic habitats on previously developed land’. Such land should not be automatically released from the Green</p>

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	<p>Belt but first be subject to ecological surveys. They can also offer the last 'wild space' in urban and other densely populated areas for local communities, improving people's access to nature and, consequently, improving health and well-being.</p>
<p><b>Local Wildlife Sites</b> Footnote 7 of the existing Framework</p>	<p>Footnote 7 of the existing Framework should also be amended to include Local Wildlife Sites (LWSs). LWSs have no legal protections and their protections are often limited to references in Local Plans. Yet they are of great significance as locally-selected wildlife-rich habitats that present a great opportunity to contribute towards the Government's 30 by 30 ambition.</p> <p>Local Wildlife Sites, along with irreplaceable habitats, should therefore be specifically referred to in the NPPF as areas that should be protected from potentially damaging impacts of development.</p>
<p><b>Q27 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?</b></p>	<p>Local Nature Recovery Strategies (LNRS) will play an important role in identifying areas of nature which can be enhanced with a particular focus on identifying areas in the Green Belt. According to the <a href="#">LNRS statutory guidance</a>, in relation to Green Belt,</p> <p><i>"If a responsible authority has Green Belt in their area, they should actively seek to target areas that could become of particular importance inside the Green Belt. This supports the government's intention for Green Belts to provide multiple benefits, including nature recovery and increased public access to nature. Similarly, responsible authorities should also look for areas that could become of particular importance near to people's homes to improve public access to nature, biodiversity, and environmental benefits."</i> (para 82)</p> <p>As an LNP, we would strongly welcome reference within the NPPF to protecting land for nature recovery identified in LNRSs. However, there needs to be more detailed guidance as to how exactly this would work in practice and what weight it would be given in LPA decision making for both plan making and decisions.</p>

<b>NPPF consultation proposal reference</b>	<b>NEP's response</b>
	<p>It is therefore essential that the long-awaited secretary of state guidance to Local Planning Authorities on how they must have regard to LNRSs in Local Plans and development management should be issued without further delay. We note that the regulations state this must be provided by 1 January 2025.</p>
<p><b>Q36 Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs?</b></p>	<p>As recognised in the <a href="#">LNRS statutory guidance</a> (para 82), Green Belt land has the potential (and we would argue also on PDL) to contribute to nature recovery.</p> <p>We welcome the recognition that access to nature is a critical part of creating positive and successful places to live.</p> <p>However, we would also suggest that the need to provide benefits for nature and public access should be strengthened and broadened - to include i) the need for high quality, wildlife-rich green space and ii) be expanded to all development sites.</p> <p>We would also encourage a tighter definition of what high quality green spaces and nature might look like – e.g. to include reference to their wildlife value, range of habitats, condition, uniqueness, and connectivity – to ensure more emphasis on the provision of nature and its multiple benefits to people, than just provision of amenity green spaces.</p> <p>Whilst we welcome the reference to green infrastructure networks within this section, the LNRS should also be referenced, as it will provide detailed information relating to the area's natural environment and local habitats, and identify the specific opportunities for how to achieve the most appropriate nature restoration at any one site.</p>
<p><b>Q37-38</b> <b>Do you agree that Government should set indicative benchmark land values for land</b></p>	<p><b>Benchmark Land Values</b></p> <p>We agree, and particularly so if a fair proportion of any funds raised were invested in measures of benefit to biodiversity and the environment, and to those that will facilitate public access to</p>

<b>NPPF consultation proposal reference</b>	<b>NEP's response</b>
<p data-bbox="188 244 775 355"><b>released from or developed in the Green Belt, to inform local planning authority policy development?</b></p> <p data-bbox="188 403 775 472"><b>How and at what level should Government set benchmark land values?</b></p>	<p data-bbox="797 244 898 272">nature.</p> <p data-bbox="797 320 2042 472">Even if nature is provided on-site, many residents of new developments will seek access to nature with more mature areas of natural habitats. The impact of more visitors can lead to increased costs for such sites, yet there is often no financial flow of monies from developers or residents to the sites visited.</p> <p data-bbox="797 520 2042 632">We would welcome a process of benchmarking land values that enabled such funding, where the recipients of that funding could then improve infrastructure at sites to enhance the sites for public access and address impacts on wildlife as a result of a greater number of visitors.</p> <p data-bbox="797 679 2042 823">Such a mechanism should not replace existing mechanisms for sites that are at particular risk of recreational impact from new development, but be more of a general funding stream to support access to nature on a local authority-wide basis to help address the impact of new developments.</p>
<p data-bbox="188 876 551 904"><b>Infrastructure (Q42 and 66)</b></p> <p data-bbox="188 952 775 1182"><b>Q42 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?</b></p> <p data-bbox="188 1230 775 1299"><b>Q66 Do you have any other suggestions relating to the proposals in this chapter?</b></p>	<p data-bbox="797 916 2042 1027">The existing golden rules should be reviewed to 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</p>



NPPF consultation proposal reference	NEP's response
<p><b>Chalk Streams</b></p>	<p>In its current form, the National Planning Policy Framework fails to grant appropriate protections for our precious and irreplaceable chalk streams in new developments. There are only around 250 chalk streams in the world, with 80% of these endangered rivers located in Southern England, and many in the Chilterns. Despite being England's equivalent to the Great Barrier Reef or Amazon Rainforest, current planning regulations fail to provide adequate, bespoke protections of our chalk streams, with only 11 out of the 220 British chalk streams having any legal protections as a Site of Special Scientific Interest (SSSI). Even then, status as a SSSI is not appropriate for chalk stream protection, as the streams are heavily influenced by activities across their catchments.</p> <p>Instead, a bespoke protection is required to reflect these unique habitats. Urgent, ambitious action is essential to ensure their long-term health and valuable ecological services are protected, as previously highlighted by the 2021 <a href="#">CaBA Chalk Stream Restoration Strategy</a>.</p> <p>In light of the ongoing degradation of our precious chalk streams, we urge the Government to utilise the opportunity of its planning reforms <u>to designate chalk streams and their catchments with a bespoke protection, integrated within the National Planning Policy Framework.</u></p> <p>This protection should tackle direct harm and wastewater pollution. Our recommendations for specific policy amendments to the existing NPPF to deliver much needed chalk stream protection can be found below:</p> <ul style="list-style-type: none"> <li>▪ Under 20b) add a sub clause i) 'or, in the case where headroom in water supply and/or sewage treatment provision does not exist in chalk stream catchments or is not provisioned for through development, provide for such development to be water and/or nutrient neutral'</li> <li>▪ Under 20d) include specific reference to the 'conservation, protection and</li> </ul>

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	<p>enhancement of irreplaceable chalk streams, associated riparian habitats and blue infrastructure'</p> <ul style="list-style-type: none"> <li>▪ Under 180i) add specific reference to recognise the intrinsic value and wider natural capital benefits of rivers, including chalk streams and their associated riparian habitats.</li> <li>▪ Under 186c) chalk streams and associated riparian habitats should be listed alongside ancient woodland as an irreplaceable habitat and listed in the glossary as such. Existing references to 'unless there are wholly exceptional reasons and a suitable compensation strategy' should be removed. Footnote 69 outlining 'for example infrastructure projects where the public benefit would clearly outweigh the loss or deterioration of the habitat' should also be removed.</li> <li>▪ Under 187), introduce a new point d) to grant 'chalk streams and associated riparian habitats' the same protection as habitat sites.</li> <li>▪ Under 191), add sub-clause 191d) to include 'protect globally rare chalk streams from the impacts of pollution and habitat loss through adherence to a 50 metre 'no development' buffer zone along the riparian corridor'.</li> </ul>
<b>Chapter 8 – Delivering community needs</b>	
<b>Public infrastructure</b>	
<b>Q67 Do you agree with the changes proposed to paragraph 100 of the existing</b>	The proposals suggest adding wording to Para 100 of the NPPF to make clear that <i>"...significant weight should be placed on the importance of facilitating new, expanded,</i>

<b>NPPF consultation proposal reference</b>	<b>NEP's response</b>
<b>NPPF?</b>	<p data-bbox="898 244 2029 276"><i>or upgraded public service infrastructure when considering proposals for development"</i></p> <p data-bbox="804 323 2040 547">We would advocate that early planning for high-quality, nature-rich green infrastructure, maximising connectivity with existing nature corridors and networks, is explicitly acknowledged here too, as a weighted consideration of proposals for development. This would ensure developers plan around existing ecological networks and access points and plan ahead to maximise retention and restoration of nature, to meet national and local nature and biodiversity targets.</p>
<b>Promoting healthy communities</b>	
<b>Q70 How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?</b>	<p data-bbox="804 715 2029 946">The current National Planning Policy Framework (NPPF) already acknowledges the importance of accessible green spaces to communities. For instance, paragraphs 97, 102–107, 159, 181, and 192 highlight the role of green spaces in providing opportunities for physical activity and fostering healthy lifestyles. Local plans, which follow NPPF guidelines, include policies specifying minimum standards for various types of open spaces based on size, quantity, and accessible distance thresholds.</p> <p data-bbox="804 994 2029 1066">However, the NPPF lacks a requirement for developers to ensure that new parks, open spaces, and green infrastructure are adopted by, or entrusted to, well-resourced stewardship bodies.</p> <p data-bbox="804 1114 2029 1185">Developers should not only be required to <i>provide</i> new parks and green spaces, but the NPPF should also require that these spaces are:</p> <ul data-bbox="853 1193 2029 1367" style="list-style-type: none"> <li data-bbox="853 1193 1659 1225">- Nature-rich – to help meet national nature objectives; and</li> <li data-bbox="853 1233 2029 1367">- Managed and maintained for the long term - by appropriately-resourced stewardship bodies that are required to both maintain the spaces into the long-term. Such stewardship bodies should also engage with the communities to facilitate, enable and promote access to, and use of, the green spaces by the community – therefore</li> </ul>

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	<p>promoting and encouraging mental and physical health and wellbeing.</p> <p>In terms of funding this requirement, an exemplar model for green space stewardship is the <a href="#">Milton Keynes Parks Trust</a>—an independent charity that adopts green spaces from developers through commuted sums (endowments). The Parks Trust not only maintains the landscape of the parks it adopts but it also runs community programmes to encourage access and use of these vital spaces by the community.</p>
<p><b>Green in Fifteen Q70 and Q71</b></p> <p><b>How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?</b></p> <p>Do you have any other suggestions relating to the proposals in this chapter?</p>	<p>The NPPF does not provide any clear definition of ‘access good quality green spaces within a short walk of their homes.’ The <a href="#">Environmental Improvement Plan</a> 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 <a href="#">Natural England's Green Infrastructure Standards</a>. However, in 2023, Natural England estimated that <a href="#">a third of English households</a> do not have a natural space within 15 minutes’ walk. The NPPF should make Natural England’s Green Infrastructure Standards compulsory for all new developments.</p> <p>The NPPF should also be revised to add further protection for existing open spaces by requiring any proposals to build on existing open space, sports and recreational buildings (Paragraph 101 (renumbered from 103)) to pass <b>both</b> tests (a) and (b) as listed in the paragraph, rather being required to only pass one of these tests. Hence the revised paragraph would read:</p> <p><i><del>103.101. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:</del></i></p> <ul style="list-style-type: none"> <li><i>a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; <del>or</del> and</i></li> <li><i>b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</i></li> <li><i>c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.”</i></li> </ul>

NPPF consultation proposal reference	NEP's response
<b>CHAPTER 9 – SUPPORTING GREEN ENERGY AND THE ENVIRONMENT</b>	
<b>Green energy and the role of Local Nature Recovery Strategies</b>	
<b>Q72 Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?</b>	<p>Chapter 9 proposes changes to the NPPF to support green energy generation and the environment. The NEP strongly recognises the need to achieve net zero targets, and the contribution that low and zero carbon developments make towards them, but would encourage the addition in the NPPF of:</p> <ul style="list-style-type: none"> <li>- Clearly defined benefits to the environment and weighing up possible disbenefits when assessing the relevant planning application</li> <li>- Recognition of the importance of areas identified for nature recovery via the Local Nature Recovery Strategies when considering land proposed for green energy projects (in the same way as the consultation proposes for land being released from the Green Belt).</li> <li>- Green energy projects to take advantage of development to create, improve and connect habitats and take action for nature recovery, as set out in the relevant LNRS.</li> </ul>
<b>Q74 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?</b>	<p>Yes, appropriate protections and/or compensatory mechanisms should be put in place for habitats containing peat rich soils. This approach is justified due to the significant time it takes to restore such habitats and the important carbon sequestration role they play.</p>
<b>Tackling climate change</b>	
<b>Q78 In what specific, deliverable ways could</b>	Please see the response from Buckinghamshire Council for this response, which we support.

NPPF consultation proposal reference	NEP's response
<p><b>national planning policy do more to address climate change mitigation and adaptation?</b></p>	<p>This emphasises:</p> <p><i>Flood risk and climate change allowances</i></p> <ul style="list-style-type: none"> <li>- The government should issue detailed national guidance on how to undertake the Sequential Test in relation to all sources of flood risk, for plan-making and decision-taking. At present there is no definitive way of comparing probability and risk from sources other than fluvial and surface water.</li> <li>- The government should continue to fund detailed groundwater modelling as per through Project Groundwater and take Project Groundwater's findings into account when formulating future groundwater policy.</li> <li>- The government should address the shortcomings of the Environment Agency via proper resourcing of the agency and making its involvement in the preparation of local plan evidence studies (Strategic Flood Risk Assessment, Water Cycle Studies) mandatory, including mandatory response times. As a Duty to Cooperate (DtC) prescribed body, the Environment Agency should be made accountable for shortcomings in DtC matters where it hinders local authority local plan preparation.</li> <li>- Enable local plans to be able to identify and designate areas for natural flood management improvement/ nature recovery and use Section 106 and CIL funding towards local priority areas.</li> </ul> <p><i>Climate change mitigation and adaptation:</i></p> <ul style="list-style-type: none"> <li>- Whilst acknowledging that this could have a short-term impact on construction costs, the government should strengthen the NPPF to allow local plans to go beyond the national standards for climate change and sustainability in Building Regulations. The Planning and Energy Act 2008 already allows local plans to do this, and bringing the NPPF into line with the Act would provide clarity to local authorities, developers and Planning Inspectors.</li> <li>- The NPPF should prioritise the adoption of the Future Homes Standard, which has been</li> </ul>

NPPF consultation proposal reference	NEP's response
	<p>delayed several times since 2016. This would provide certainty both to developers and local authorities.</p> <ul style="list-style-type: none"> <li>- Specific, ring-fenced funding should be provided to authorities for resourcing Climate Change consideration within Planning Policy and Development Management.</li> <li>- The NPPF should clarify the role of Local Area Energy Plans, Regional Energy System Planners in area-based energy planning and ensure local authorities and other stakeholders beyond the private sector are engaged and involved in Energy Planning.. LAEPs, or any other vehicle the government/Ofgem determine appropriate, should be mandated and funded in the same way a Local Plan or Local Transport Plan are. Dep. Energy Security &amp; Net Zero should be involved to ensure that plans developed by Ofgem are aligned with Net Zero ambition and principles of sound democratic governance.</li> </ul> <p>In addition, the wider NEP suggests the following:</p> <ul style="list-style-type: none"> <li>- <u>Delivery</u> of Local Nature Recovery Strategies (not just <i>producing</i> an LNRS) – must be adequately funded locally, so that strategic work to restore nature in LNRS areas is maximised and projects can be targeted and facilitated, involving multiple sectors, and delivered in ways that can also contribute to climate goals. Local Nature Partnerships are ideally placed to enable this but require long-term funding to support local partners.</li> <li>- Requirements in design codes and building regulations to adopt maximum opportunities for rainwater capture and harvesting, and the provision of shade, water, and tree canopy requirements, with appropriate assessment of resilient species, for climate future-proofing urban and development areas.</li> <li>- The UK is not sufficiently adapted to the risks of climate change and extreme weather, including increasingly severe extreme rainfall and flooding events, yet opportunities to manage and mitigate flood risk more effectively through nature-based solutions (NBS) and natural flood management (NFM) are currently being missed. These green solutions are often cheaper to implement than traditional 'grey' solutions and can also</li> </ul>

<b>NPPF consultation proposal reference</b>	<b>NEP's response</b>
	<p>deliver multiple benefits for people and wildlife. Government needs to drive regulators towards facilitating NBS and NFM, provide more funding for their delivery, and make Natural England's Green Infrastructure Standards compulsory for all new developments.</p> <ul style="list-style-type: none"> <li>- Consideration should be given to "Climate Change Mitigation &amp; Adaptation" being made a statutory consultee on the same footing as e.g. Landscaping or Flooding, to ensure adequate priority and resourcing is given.</li> </ul>
<p><b>Q85 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?</b></p>	<p>There needs to be action nationally on water companies in charge of wastewater networks, wastewater treatment works and sewerage discharge limits into watercourses. The planning system can only go so far to ensure there is sufficient infrastructure capacity for growth and arrangements put in place to control pollution. Water companies are responsible for existing water pollution which the Council knows is occurring locally and affecting existing communities. In some cases, it is also posing threats to the functioning of woodlands and ecology on sensitive sites such as Sites of Special Scientific Interest.</p> <p>The NPPF could set out that Section 106 developer contributions and Community Infrastructure Levy funding could be used to identify and deliver local priority measures for improving the water and natural environment (and secure Biodiversity Net Gains and potential Suitable Alternative Natural Greenspace enhancements). Improvements such as these could align with any improvements which water companies will set out in the new Drainage and Wastewater Management Plans (DWMPs) that were given legal status by the Environment Act 2021.</p>



NPPF consultation proposal reference	NEP's response
<b>Chapter 11 – CHANGES TO PLANNING APPLICATION FEES AND COST RECOVERY FOR LOCAL AUTHORITIES RELATED TO NSIPs</b>	
<b>Funding LNRS delivery</b>	
<b>Q98 Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider planning services? If yes, please explain what you consider an appropriate increase would be and whether this should apply to all applications or, for example, just applications for major development?</b>	<p>Yes, and to all application types. Planning is not just about determining applications, and all other aspects of planning work, unrelated to determinations, should be adequately funded if planning departments are expected to deliver them.</p> <p>Related to this, we strongly advocate that funding should be made available for the <i>delivery</i> of Local Nature Recovery Strategies. Local Nature Partnerships are perfectly poised to enable, facilitate, focus and collaborate on the required delivery of LNRS priorities and measures across LNRS areas.</p>
<b>Ecology Officers</b>	<p>Related to this, although not directly part of this consultation, the Government's pledge to hire 300 more planning officers is linked to the policy objectives of the proposed changes to the NPPF to deliver 1.5 million homes in England over the next five years. Streamlining the planning system and recruiting additional planning officers will increase the number of planning applications Local Planning Authority (LPA) ecologists will need to review. Many LPAs are severely under resourced particularly in relation to ecology and some do not currently have ecologists. Any plans to increase the number of planning officers and speed up the planning process should also include plans to increase the capacity of LPAs to review the ecological impacts of development proposals.</p>
<b>Biodiversity net gain</b> (NPPF Chapter 15, Habitats and Biodiversity Para 180d, 185 an 186)	<p>The Government should consult on Biodiversity Net Gain with a view to ensuring on-site gains, applying BNG to major infrastructure projects, and increase the current minimum requirements of 10% to 20% net gain.</p>