



**RTPI**

Royal Town Planning Institute

# RTPI response to the Development and Nature Recovery working paper by MHCLG and Defra

January 2025

## About the RTPI

The Royal Town Planning Institute (RTPI) champions the power of planning in creating sustainable, prosperous places and vibrant communities. We have over 27,000 members in the private, public, academic, and voluntary sectors. Using our expertise and research we bring evidence and thought leadership to shape planning policies and thinking, putting the profession at the heart of society's big debates. We set the standards of planning education and professional behaviour that give our members, wherever they work in the world, a unique ability to meet complex economic, social environmental and cultural challenges.

### **(a) Do you consider this approach would be likely to provide tangible improvements to the developer experience while supporting nature recovery?**

Maybe.

We strongly support a strategic approach towards nature recovery and we welcome this proposal as a good first step towards that. It is positive that the government is proposing a stronger emphasis on environmental outcomes over a broader geographical scale, departing from the current process-focused approach where monitoring can be lacking in some circumstances.

However, we have concerns over:

- i. How the 'Delivery Plans' are going to link with emerging and existing spatial plans, especially amid the expansion of Strategic Spatial Strategies to cover the whole of England;
- ii. Relatedly, the support to be given to local and strategic authorities to manage competing land use demands amid pressure to deliver housing and infrastructure, as well as to protect the environment;
- iii. The rollout of Environmental Outcomes Reports (EORs): The RTPI has expressed deep concerns over the proposal set out in the last government's consultation in May 2023. While EORs are not the main subject of this working paper, there is an expectation that they will form an important part of the future model of nature recovery (hence Question f in this working paper). The RTPI would welcome opportunities to work with the government to improve the EOR proposals so new developments would deliver for the economy, environment and communities; and
- iv. Availability of support and resources to ensure effective monitoring of the outcomes.

**(b) Which environmental obligations do you feel are most suited to this proposed model, and at what geographic scale?**

The RTPI does not have a view on specific environmental obligations to be included in this model but would emphasise the need for nature recovery to be planned holistically at a larger-than-local scale.

To this end, Local Nature Recovery Strategies (LNRS) provide an excellent basis to build on. Currently there are about a dozen spatial instruments and plans for the environment, such as river catchment management plans, air quality management plans, national landscape management plans, among others. These separate plans treat the environment in silos not as systems. As a result, opportunities are missed in addressing inter-connected issues such as water availability and quality, soil quality, flood mitigation, biodiversity etc.

In the long-run, LNRS should be further developed to coherently cover the whole environment (including for example water, flooding, soil and air quality). Essentially, there should be an ambition for LNRS to become Local Environment Improvement Plans, as [previously suggested by the RTPI](#).

There is also an opportunity for LNRS to feed into the Land Use Framework, currently under development.

We believe this holistic and strategic approach to nature recovery would be key to the success of the current proposal.

**(c) How if at all could the process of developing a Delivery Plan be improved to ensure confidence that they will deliver the necessary outcomes for nature?**

Under the current proposal, there could be more than one delivery plan in a local area. This could create further complexity and add to the number of nature-related plans and documents developers and planners have to consider in an application.

There is also a need for the delivery plans to be linked to spatial plans, including local plans and existing and emerging Spatial Development Strategies. This is particularly important amid the pressure local and strategic authorities face in housebuilding and construction of infrastructure for growth and clean energy. Support and resources must be provided for planners to manage competing land use demands from housing, infrastructure and nature, so a true win-win-win situation can be achieved.

The RTPI is aware of existing and effective local actions being undertaken to restore nature. Safeguards must be in place so these local actions will not be replaced or jeopardised by the new model.

Finally, as mentioned in our answer to Question (b), the delivery plans must be holistic in scope and strategic in scale to deliver the best outcomes for nature.

**(d) Are there any additional specific safeguards you would want to see to ensure environmental protections and / or a streamlined developer experience?**

Both the latest [MHCLG survey on local authority planning capacity and skills](#) and RTPI research ([State of the Profession 2023](#) and our [BNG survey](#)) show that there is lack of ecological expertise within local authorities – either in the form of the availability of ecologists or ecological knowledge amongst planners. Any reforms to nature recovery will first have to address this resource and capacity issue.



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[Research](#) also shows that across England, only 53% of the ecological mitigations and enhancements committed by developers are in place on the ground. The researchers attributed this low compliance rate to a lack of resourcing in enforcement and ecological skills. For the current proposal to succeed, support and resources for effective monitoring and enforcement must be in place.

**(e) Do you support a continued role for third parties such as habitat banks and land managers in supplying nature services as part of Delivery Plans?**

Yes.

As mentioned in our response to (c), there are existing successful mitigation schemes in some local areas. A continued role for third parties such as habitat banks and land managers will avoid development stalling in these areas.

Natural England is named as a possible delivery body in the working paper. While this makes sense, Natural England does not have the capacity or 'feet on the ground' to actually deliver any of the mitigation. Local organisations, such as National Park Authorities and the LNRS Responsible Bodies, thus have an important role to play as they have the contacts with landowners and the knowledge of local landscape and ecology.

**(f) How could we use new tools like Environmental Outcomes Reports to support this model?**

The RTPI has expressed deep concerns over the replacement of Environmental Impact Assessments (EIAs) with Environmental Outcomes Reports (EORs) when the last government consulted on it in 2023. In summary, we think:

- Many of the shortcomings in relation to EIAs arise from severe resource shortages and for any reforms to succeed, this issue must be resolved.
- The last government proposed to exclude social and economic matters from plan-level EOR. We disagree with this. We consider it essential that both impacts on human health and how plans and projects interact with climate are included.
- The decision not to roll together Habitats Regulations Assessment into EOR is a missed opportunity.
- It is unclear if the EOR regime will retain current levels of public involvement in environmental assessment
- The introduction of a different regime for England, distinct from the alternative use in other nations, can create confusion for industry and difficulties on cross-border plans and projects.

The RTPI believes that the EOR proposal can be improved so they can deliver the best outcomes for nature, communities and the economy alongside the model proposed in this paper. The Institute will welcome opportunities to work with the current government on their plans for EOR.



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**(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?**

As Defra is consulting on the Land Use Framework, there is an opportunity to tie these delivery plans to the national spatial picture of nature recovery and environmental protection.

More broadly, we welcome the government's commitment to adopting a more spatial approach towards infrastructure planning. The RTPI believes there is now an opportunity for England to develop a [National Spatial Framework](#). This working paper is looking for a win-win solution for nature and development. A National Spatial Framework that guides where development should go will help identify land use conflicts (including between development and nature) early and provide better certainty for both developers and communities.

Building on existing government initiatives, the RTPI proposes that the National Spatial Framework for England should comprise:

- Spatial plans for infrastructure and new towns (SSEP, Land Use Framework and other spatial plans under development);
- An overarching document that directs how these different sector-based plans should come together;
- A map that visualises the spatial implications of existing government policies.

A National Spatial Framework will:

- Help direct investments and coordinate funding streams;
- Provide a place-based perspective for the government's agenda for growth and nature recovery; and
- Coordinate local, regional and national planning.