

**Informing planning reform and environmental improvement**  
Wildlife and Countryside Link Land Use Planning Group briefing  
October 2020

The growing recognition of the importance of access to environmental information across government, particularly in relation to the planning system and wider land use, is welcome. To be effective, major investments will be needed in data collection at the landscape and site-specific scale; improvements will be needed in the way data is handled and shared, with investment in expertise to interpret the data; and planning and decision-making processes must be amended to ensure that environmental information is properly taken into account.

The white paper advocates a radically streamlined, better evidenced but ‘assessment-light’ planning system, with a revised framework of national policies and standards with framing local spatial plan. It suggests that this should not only continue to protect sites, species, habitats, and key ecosystem services, but strengthen such protection.

To facilitate high quality development at greatly increased rates without undermining environmental improvement, any planning reform will need to be founded on a similarly radical approach to environmental information. Such an approach must be outcome-led and data-driven, ensuring that information of requisite quality will be available and put to use, and that the necessary systems, standards, expertise, strategies, funding mechanisms and overall infrastructure will be in place to facilitate this. There must be clear requirements for data to be taken into account in decision-making.

Whereas the proposals rightly suggest that local and national data be used to guide plans and projects from an early stage – supporting the mitigation hierarchy – much will depend on the quality (coverage, resolution, accuracy, currency, completeness) of data and meta-data, and the integration of information systems employed in support of the planning process and local environmental improvement plans.

The environmental data sector has long advocated the benefits of harnessing of information – in accordance with best practice and data standards – to facilitate digitally-enabled, evidence-based planning and decision-making. For this, the right evidence needs to be findable, accessible, interoperable and reusable and used and interpreted in the right way, at the right time.

Integrating information needs for planning and the environment

Targets under the Environment Bill, ambitions in the 25 Year Environment Plan and any new planning system will overlap considerably in relation to their data and information management needs. However, in the current proposals, there is no clear mechanism for incorporating improved environmental information in the proposed planning process. Without a clear connection to decision making, the value of new data is wasted.

**Local Nature Recovery Strategies** are a new mechanisms proposed in the Environment Bill. They could be the principle nexus for the interaction between environmental improvement and planning, but they are currently unrecognised in the proposed planning reforms. The duties associated with LNRs in the Environment Bill are not strong enough to ensure they are used to full effect.

Based on national park, metropolitan and county boundaries, LNRs will cover all of England without overlap. They will in all likelihood provide the administrative and spatial basis for targeting the new **Environmental Land Management Scheme**, and **Biodiversity Net Gain** and **Environmental Net Gain** offsets. Moreover, LNRs mapping of areas of high environmental opportunity will align with the mapping and information needs of Planning for the Future’s Protected, Growth and Renewal area classifications. LNRs have the potential to coordinate a much richer picture of environmental information, which will help to improve planning decisions.

For example, there is a need to identify and safeguard not only sites and processes that are of intrinsic high value, but those areas and features which serve linking or buffer roles in ecological networks

Getting the collective set of LNRSs right will be vital to an effective Nature Recovery Networks, the successful reform of local planning, to securing local community support, and to realising the aspirations of the 25 Year Environment Plan. LNRSs and Local Environmental Improvement Plans should inform plans and ensure the best outcomes are secured locally, support cross-boundary working and national priority-setting, reporting and evaluation. Their success will be dependent on a number of critical components being in place

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#### **Critical Components for Local Nature Recovery Strategy Success**

- (a) A **spatial plan** to prioritise and guide actions (taking account of local, neighbouring and national priorities);
- (b) the **geospatial data** of adequate quality and currency (available in appropriate form), to evidence this;
- (c) a **living map** based on these data which incorporates opportunities and constraints, proposals and commitments as well as environmental information which is updated dynamically, e.g. as new development is permitted or habitat enhancement implemented;
- (d) an **information strategy** to ensure that data and information systems to meet ongoing and future information needs will be available, updated and utilised as stipulated (via e & f);
- (e) **standard procedures** e.g. for survey, sampling and data collection, monitoring, data analyses, data access, information usage, reporting and evaluation;
- (f) **standards** for the required data, metadata and accessibility (e.g. [FAIR](#)) including machine readability;
- (g) a **geospatial administrative information system** to allow proposals, required actions and implementation to be tracked and outcomes evaluated locally so any intervention may be taken in a timely way and facilitate cross-boundary working and national reporting and evaluation;
- (h) the necessary **guidance** and **expertise** to use and manage these;
- (i) an **LNRS panel** or '**responsible body**' to be accountable for ensuring that these are in place, operate effectively and are regularly reviewed and updated;
- (j) an **LNRS partnership** with a shared interest in and responsibility for LNRS goal setting and delivery at local level.

Note: With regard to (g), in addition to 'normal' **environmental data** of various types, **administrative data** and **performance data** which adhere to agreed standards (f) and systems to employ and communicate these will be required. These would also provide a full audit trail.

Note: it is crucial that LNRS' are integrated with other vital environmental policies, crucially the Environment Bill and Agriculture Bills and any other environmental regulation.

each LNRS.

To achieve this, the link between LNRSs and Local Plans should be strengthened in the Environment Bill and they should be recognised as the basis for identifying strengthened "highly protected areas" and "nature recovery areas" in the proposed planning reforms. This would ensure that the planning system is capable of delivering information-led environmental improvement, as well as simply minimizing harm.

By facilitating better environmental understanding, the resulting information systems and underpinning geospatial databases would enable major changes to the planning system: addressing perceived and real

obstacles and minimising delays as well as ensuring that better evidenced local plans, development schemes, decisions and agreements result in more positive, lasting outcomes.

Getting to this position will require a number of enabling measures to be put in place. The combined aspirations of the 25 Year Environment Plan and Planning for the Future provide ample justification for the required changes. Consideration should be given to how these may be integrated to best effect to increase efficiency, reduce overheads and provide ancillary benefits.

### Preparing the Way

The best available data should be better integrated into the planning system immediately, followed by a costed audit of environmental data needs, gaps, provision and use is needed. This audit should be used to inform an information strategy for the national Environmental Improvement Plan that maps out the existing and missing elements of our national environmental information infrastructure, the measures required to support, link and facilitate these and the means of funding their implementation. This will require investment to enable more efficient, truly sustainable development in pursuit of local needs, national priorities and the environmental imperatives which successive governments, business and society as a whole have yet to address.

Initial capital investment is needed, e.g. to enable LNRS partnerships to map and assess habitats across their areas in accordance with the UKHab classification, in preparation for the launch of LNRSs, Biodiversity Net Gain and the Environmental Land Management system, and for information systems to support local administration, delivery and monitoring and national prioritisation and evaluation in a joined up way. Mechanisms should also be established to ensure that planning applicants, national agencies and research bodies contribute proportionately to the provision of access to, curation and updating of information. Environmental information should also be made more accessible and affordable to schools and members of the public.

### Cautions and Considerations - Some Key Points

- Radical changes to the planning system and its supporting frameworks will necessitate a radical approach to environmental information, knowledge, enlightenment and local democracy.
- Existing information systems will not meet EIP needs and would not create an adequate baseline for meeting targets set under the Environment Bill. While better baseline data will be vital to determining what development and environmental improvements should go where, site specific surveys to assess and guide individual proposals will remain essential.
- The UK has consistently failed to 'stem the tide of decline' in nature or meet environmental targets. Two key reasons for this have been the lack of provision of datasets of adequate quality and completeness and the ability to access those that exist.
- As part of the announced 'Natural Capital and Ecosystem Assessment', it is vital that there be a costed audit of the national environmental information infrastructure against the needs, targets and reporting requirements for the EIP.
- Quality-assured environmental information and the means to harness it need to be recognised as public goods deserving support in their own right – as well as a necessity to achieving the aspirations of the 25 Year Environment Plan and a planning system that will be fit for purpose.
- Neither individual local approaches nor some 'centralised body of data on species populations' will be adequate. An integrated approach is needed that works at all levels across the spectrum of environmental information needs and recognises and learns from previous missteps and failings.

- However even where data is accessible, the lack of obligation to use it and the nature of funding/charging mechanisms tends to discourage their use, or results in unauthorised commercial usage and infringement of Intellectual Property Rights. One unacknowledged consequence is that fewer resources are available to support national and local volunteer recording groups which necessarily impacts on data provision and quality assurance.
- Similarly, despite industry guidance, the vast bulk of data in connection with development is not made available for re-use. Given HS2 expenditure on 'newt-counting' and other environmental information, how much of this is now accessible?
- Open data provision is something to be strongly encouraged but the misinterpretation of 'open' as 'free' in some parts of government, and the failure to recognise and meet the unavoidable resource costs of data curation and quality assurance, has resulted in unnecessary problems.
- Ongoing incorporation of new approaches and new technologies should be encouraged wherever they can be relied on to support on the ground decision-making and delivery.
- One-size-fits-all approaches to data-led environmental planning are often unsuitable and a mutually supportive combination of measures will be required. For example, District Level Licensing is likely to promote Great Crested Newt conservation but will be less rather than more likely to suit other species.
- The UK is a world leader in the collection and provision of environmental information in many ways, yet the 25 Year Environment Plan does not acknowledge the value or even the existence of the National Biodiversity Network which, although set up 20 years ago to facilitate data provision and access by a range of stakeholders, has never been adequately funded.

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