

External feedback form

Building a better environment: Our role in development and how we can help.

Please return your comments by October 19th to sustainableplaces@environment-agency.gov.uk

Name (optional)	Stephen Russell	Organisation	Landscape Institute
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Q1: Content

- a) Does this document help you better understand the role of Defra family organisations in the planning system? What are its main benefits to you as a customer?
- b) Does the document cover all the key environmental themes which you associate with our three organisations when working on new development proposals?
- c) Are there any improvements you would like to see made to the detailed content? Please highlight the specific section and text to which your comments relate.

a) Yes (to part one of the question) n/a (to part two)

b) Yes

c) See below:

Page 5

It might be helpful, in the interest of being succinct, to move the majority of the detail surrounding the planning process to an appendix. It might also be more persuasive if the paragraph about saving time and money (page 6) was moved to this section

Page 6

Would this benefit by including the consents and permits detail from page 23?

Pages 9-22

For each theme, 'context' and 'our role' should be edited down to 2/3 key points.

Would each of the themes benefit from being divided into 'essential considerations' and 'important considerations', e.g.

1. Essential considerations before you plan your development

(For each theme there needs to be an emphasis on why a developer must consider this issue from the outset, e.g. EU Directives and national regulations etc).

(a) Water, pollution and infrastructure

- Managing the risk of flooding
- Managing surface water
- Using water wisely
- Land affected by contamination (including the need to mention role of local authorities and controls they will impose)
- Preventing pollution
- Managing waste

(b) Wildlife and natural resources

- Woodlands and trees
- Statutory wildlife sites and biodiversity
- Protected wildlife species and licencing
- Sustainable management of soils

2. Important considerations to make your development sustainable

We suggest the following insert:

The Government's National Planning Policy Framework advises that the planning system must seek to achieve sustainable forms of development. This means that any planning application will be considered in terms of its sustainability, that is its long term impacts on society, the economy and the environment.

You should be aware that in order to be considered sustainable, you will need to demonstrate that your development proposals will make a significant contribution to the health and wellbeing of local residents, help to create places where people want to live, work and visit, and help the area to adapt to the effects of climate change.

The following themes could then be moved into this category:

- Environmental issues and opportunities for development
- Sustainable construction and design
- Delivering green infrastructure
- Access, recreation and leisure
- Landscape character

Q2: Style, tone and format

- a) Is the document clear in its structure and easy to navigate?
- b) Does the language used strike the right balance between provision of concise initial advice in plain English, without being overly prescriptive or complicated?
- c) We intend to publish the final version as a pdf, hosted on each organisation's website. Do you have any comments on the proposed publication location and format - are there any other formats you would consider using?

- a) While clear and easy to navigate to ourselves, an environmental charity and professional body, it is important to remember that developers will generally rely on their experts to advise them on matters contained within this publication. Developers themselves will generally be most interested in (a) obtaining planning permission and (b) making development profitable. While this draft has excellently summarised key issues, it could usefully be presented in a compact format. Figure 2 is excellent but needs to refer to the relevant sections/page numbers
- b) Yes
- c) No

Q3: Further information and case studies.

- a) Are there any further technical resources to which you feel this document should link?
 - b) Would you be willing to work with us to produce good practice case studies which illustrate each theme in the document? If so, please provide your contact details and the key theme(s) these relate to.
- a) No – any additional resources at this stage might complicate the guidance.
 - b) Please contact Stephen Russell, Policy and Public Affairs Officer at the Landscape Institute regarding future opportunities for developing good practice case studies in respect of the following themes:
 - Delivering green infrastructure
 - Sustainable construction and design
 - Managing the risk of flooding
 - Managing surface water
 - Using water wisely
 - Land affected by contamination
 - Preventing pollution
 - Managing waste

Do you have any other comments?

The Environment Agency, Forestry Commission and Natural England should be applauded for gathering all this information together in one place. It is generally a very informative, thorough, helpful and well presented publication.

Thank you for taking the time to provide us with your feedback.