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The Rt Hon Steve Reed MP
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By e-mail only

21 February 2025

Dear Secretary of State,

Planning Reform Working Paper: Development and Nature Recovery

Thank you for making clear your overall thinking on development and nature recovery in your recently published working paper. We appreciate this transparency, and welcome seeing your thinking so early in this government.

You ask some specific questions in the working paper. For the most part, they are for others to answer, but stimulated by the paper, I wanted to take the chance to make one or two pertinent points. Additionally, I want to say that the OEP is here, and you can commission specific advice from us. It is part of our role to give formal advice to government upon request, and indeed we can give such advice in any event when the law relating to the environment is changing.

Government is committed to a bold vision for significantly improving the natural environment over the medium term. It has several legally binding targets for doing so, the most proximate ones - for water, nature and air - due in 2027 or 2030, just a few years away. Of course, we have a very direct and immediate interest in these commitments, and how they are to be met. But we also recognise fully that government has stated its priority focus on growth with clear commitments made on housing, infrastructure and clean energy.

We think your broad proposals have real potential if delivered well. We have long been of the view that building more houses and improving our national infrastructure need not be at a cost to the environment overall. To achieve the win-win scenario you speak of in the paper, we have the following suggestions to increase the chances of success – and by success, we mean supporting nature's recovery, whilst also enabling housebuilding and development on the scale you envisage.

Firstly, we commend to you our 2023 report on environmental assessments (www.theoep.org.uk/report/environmental-assessments-are-not-effective-they-should-be-due-practical-barriers). We appreciate you wish to move to Environmental Outcomes Reports. We look forward to hearing from you about the detail of what is

envisaged here, but we suspect that the three issues we identified in our 2023 report will persist and will hamper good progress unless they are dealt with.

One issue - the lack of post decision monitoring, evaluation and reporting – is resolvable, should you move responsibility for the planning, implementation and delivery of the required strategic actions in any locality to a public delivery body. We suggest that you are clear and purposeful in setting monitoring, evaluation and reporting requirements, so that ongoing accountability is clear, deliverable, and government can gauge success over time.

Regrettably, there are no quick fixes for the other two issues we identified: access to information, and access to technical environmental expertise. We note that government did commit some resources last year to support capacity and capability in local planning authorities, but the point is that it is hard to come by and then to retain. We suggest you consider how your reforms can support better opportunities to grow and retain talent, for example by establishing tenable career paths.

When it comes to access to information, good quality environmental information underpins good decision-making. However, limited data sharing has long been a known weakness hindering the current arrangements, and the subject of criticism. We know that work is ongoing (within MHCLG) to standardise certain types of data and to improve access for local authorities. This work is welcome and directly relevant to the recommendations in our report, and it will be important to continue to make progress.

Secondly, I wanted to press home the significance of the Environmental Principles Policy Statement (EPPS) as you progress. It is applicable throughout the development of the proposed reforms. It requires all departments to consider the environment purposefully at all stages of policy development, and in broad terms, to put the environment first. It recognises that the environment is not just a matter for Defra.

The EPPS is a relatively recent development. We are about to publish a short report on how it is bedding in. There is good news in what we have seen so far, but room for improvement, with a need for it to be better embedded across government policymaking.

Effective implementation of the EPPS is so important if government is to meet its legally binding environmental targets. Those targets and the commitments underpinning them relate directly to government's ambitions to clean up our waterways, reduce waste across the economy, plant more trees, improve air quality, create nature rich habitat and halt species decline by 2030 – all things you highlight in the working paper.

And no doubt the effective implementation of EPPS will be just as significant to delivery of many of the ambitions in the government's refreshed Environmental Improvement Plan, due later this year.

We would argue that it is critically important that those departments likely to have most impact on the environment are seen now to be exemplars when it comes to applying the EPPS. Given the scale of your housing ambitions, it would be so welcome to see clearly the purposeful, effective and transparent application of the EPPS as you develop your thinking and plans.

Sustained growth and a healthy economy depend upon a healthy natural environment. We see difficulties, as do you, in following a strategic approach across the board and in all ecological situations. Getting the details right will be fundamental

to the success you aspire to for nature's recovery. We look forward to hearing the detail of practical implementation as the approach is developed.

Our view is that a new legislative framework, while enabling growth alongside better environmental outcomes must ensure progress towards those environmental outcomes **at pace and at scale**. And as I have already stated, learning from the current difficulties with environmental assessments, and applying the EPPS in exemplar fashion should increase the prospects of success all round.

We welcome Government's commitment to look coherently at the challenges and opportunities for securing both development and nature's recovery, and the signs already of the joined-up approach that is essential if government is to make progress across all its stated ambitions.

I trust that you find these initial thoughts helpful. Please do let us know if we can be of any further assistance.

Yours sincerely,



Dame Glenys Stacey
Chair of the Office for Environmental Protection



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cc. The Rt Hon. Angela Rayner MP