

The Forest Town Nature Conservation Group (FTNCG), located in Mansfield in Nottinghamshire, wish to make the following outline points:

1. The Government should undertake a commitment to ensure that any changes to the planning system, such as the removal of regional strategies and the introduction of the National Planning Policy Framework, do not result in a net loss of environmental protection and enhancement. For example, East Midlands Regional Plan Policies 1 and 29 were cited by the Planning Inspector (PINS ref 2102006) to help protect the natural environment from inappropriate development. We are concerned that without such policy protection, nature conservation interests may be compromised.
2. A priority for Government should be to ensure that all areas that have a reasonable possibility of becoming a Special Protection Area (SPA) in the future, e.g. areas that meet the Stage 1 criteria (such as the suggested Sherwood Forest SPA), are swiftly designated as pSPAs. Such a designation would help provide clarity for Planning Authorities, prevent damage through inappropriate development, and comply with the UK's international legal obligations. The National Planning Policy Framework could also address the need to protect pSPAs, but this cannot be left for the Biodiversity Strategy, as the UK has already fallen behind in our SPA designations.
3. We are concerned that there may be insufficient safeguards to prevent inappropriate development on environmentally valuable sites as an outcome of the permissive nature of Neighbourhood Plans and Neighbourhood Development Orders, and the general presumption in favour of "sustainable development".
4. Greater powers should be given to planning authorities to enforce restoration conditions, including enhanced powers to levy financial penalties. This is in keeping with the notion that: "We must repair the damage done to our natural environment by restoring natural connections that have been broken" [Para 2.5]. It should be made explicit that where restoration conditions are extant, the fully restored site should be used as the baseline for any comparative environmental impact assessment.
5. Bodies, such as Natural England, should be empowered to object wherever they feel a proposed development would have a negative impact on the environment, whatever the status of the proposed development site.
6. To ensure "easy access to information and advice about the natural environment" [Para 2.31, also see 4.45] the Government should make all information held on public registers (e.g. information about environmental permits issued by the Environment Agency) available over the Internet free of charge.
7. We would like to know more about how civil society can engage as partners in the proposed Green Infrastructure Partnership.
8. We suggest that the research referred to at Para 2.63 and the Task Force mentioned at Para 2.66 should investigate the services provided by digestate from anaerobic digestion in terms of counteracting and preventing soil degradation and erosion.