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Chris Kent  
Communities and Local Government  
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Dear Chris,

**BCSC response to CLG Consultation on Planning for a Natural and Healthy Environment**

BCSC welcomes the Government Consultation *Planning for a Natural and Healthy Environment*.

BCSC represents businesses operating in the retail property sector. Our mission is to promote industry best practice and advance the professional aims of the retail property industry. Our membership is a broad church of nearly 3,000 property professionals including owners, developers, retailers, surveyors, architects and public sector managers.

We are committed to working with our members' to achieve the Government's objectives to deliver places that communities can appreciate, and we believe that good design and open are key components of the UK's shopping centres.

We look forward to working with the newly elected UK Government in its further work, as outlined in the *Open Source* green paper, streamlining the planning system.

**1. Do you support the consolidation and streamlining of policies on the natural environment, green infrastructure, open space, sport, recreation and play into a single planning policy statement?**

We welcome the Government's commitment to streamline the planning system where possible.

**2. Does the proposed PPS address sufficiently all the issues that planners and others face in relation to protecting the natural environment, delivering green infrastructure and other forms of open and green spaces, and land and facilities for sport, recreation and play?**

The proposed PPS does sufficiently address these issues. We would urge the new Government to consult further on its own biodiversity credits scheme as contained in *Open Source* prior to implementing these particular policy proposals. The retail-property industry is already struggling to deliver potential regeneration projects as the viability of schemes has been affected by the impact of the recession. A new burden, in the form of a biodiversity scheme, could well undermine the prospects of certain regeneration projects further.

**3. Do you agree with the requirement for local planning authorities to continue to produce, and keep up-to-date, open space strategies which are based on assessments of local need and audits of existing provision (NE1.3)?**

It is crucial that these strategies are kept up to date and easily accessible in order for developers are able to interrogate them well ahead of submitting plans.

**4. We propose that local planning authorities should take a strategic approach to the delivery of green infrastructure (NE4), but not to produce and publish a formal strategy (although they can do so if they choose). Do you agree with this proposal?**

The retail-property industry would like to see clarity from local planning authorities on how they propose to delivery green infrastructure. With this in mind, we would not support the above proposal - rather we would urge Government to compel local planning authorities to produce and publish a formal strategy that can then be easily accessed by relevant stakeholders.

**5. Do you agree that the proposed policy NE4 will deliver the Government's objectives without imposing any significant new burdens?**

We believe that this policy should go some way to deliver the Government's objectives. We would urge the Government to push local authorities to address the creation of green infrastructure networks in these areas as a matter of urgency. It is only with the development of such networks that large scale projects will ever be able to meet the Government's zero carbon aspirations.

**6. The amended wording of planning policy relating to the floodlighting of sports and recreational facilities (NE11) makes it clear to local planning authorities that they should balance the impacts on amenity and biodiversity against the wider benefits to the community in terms of health and wellbeing and the additional provision of facilities. Do you agree with this proposal?**

N/A

**7. Do you agree that the proposed policy NE11 will deliver the Government's objectives without imposing any significant new burdens?**

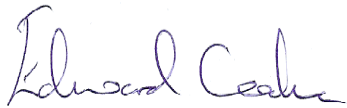
N/A

**8. Do you have any additional comments to make on this proposed PPS?**

We look forward to working with the new Coalition Government as it seeks to introduce its own policy frameworks to all national planning issues, including those discussed here in this consultation.

If you would like to receive any further information at this time, please feel free to contact me.

Yours sincerely,



**Edward Cooke**  
**Executive Director**  
**BCSC**