The Wildlife Trusts
The Kiln, Waterside
Mather Road, Newark
Nottinghamshire. NG24 1WT

Royal Society of Wildlife Trusts
Registered Charity N° 207238

National Infrastructure Commission
Finlaison House
15-17 Furnival Street
London
EC4A 1AB

BY EMAIL

31 January 2022

Dear Sir/Madam

Call for evidence: second national infrastructure assessment baseline report

The Wildlife Trusts welcomes the opportunity to provide evidence for the second national infrastructure assessment. Comments on the questions outlined in the call for evidence can be found in Appendix A.

The Wildlife Trusts welcome the National Infrastructure Commission's extended remit to "consider potential interactions between its infrastructure recommendations, the government's legal target to halt biodiversity loss by 2030 and implementing biodiversity net gain". The Wildlife Trusts have extensive experience of engaging in nationally significant infrastructure projects, particularly offshore wind. As such, we would like to offer our expertise to the National Infrastructure Commission in the development of next national infrastructure assessment to ensure that key government ambitions such as net zero and nature recovery can be achieved. Please do contact me to arrange a meeting to discuss.

Yours faithfully

JEdwards

Joan Edwards
Director of Policy and Public Affairs
The Wildlife Trusts
jedwards@wildlifetrusts.org

Appendix 1: The Wildlife Trusts response to the call for evidence questions

Question 1: Do the nine challenges identified by the Commission cover the most pressing issues that economic infrastructure will face over the next 30 years? If not, what other challenges should the Commission consider?

No. Chapter 3 of the baseline report has recognised that nature is declining at unprecedented rates. The baseline report also identifies the risk from national infrastructure on natural capital, but has only identified challenges under clean air, clean and plentiful water and reducing the risk and harm from environmental hazards with a focus on surface water flooding. The huge increase in national infrastructure in the future will have serious negative impacts on ecology and ultimately Government's commitment to halt declines in nature and protect 30% of the UK's land and sea by 2030 for nature's recovery. This needs to be recognised as a challenge within the baseline report and recommendations identified as part of the next National Infrastructure Assessment in 2023.

Section 3.2 identifies that natural capital is a prerequisite for some infrastructure, meaning that the resilience of a sector is linked to the health of the environmental assets that underpin it. For this reason, we set out with partners within our 'Blueprint for PR24'[1]. This states that Government should set a target for ecosystem resilience within the water industry through Defra's Strategic Policy Statement to Ofwat; that Cost benefit assessments for all investment should be based on Natural Capital rather than financial costs alone, and; that all water companies should adopt an enhanced Biodiversity Net Gain target for the Price Review in reflection of the fact that the sector relies upon, and benefits from, a healthy water environment. We suggest that the commission considers setting out comparable recommendations for other infrastructure sectors reflecting both the need for infrastructure to contribute to halting nature's decline, and the value of investing in the natural capital which underpins the sector itself. This would also support new mandatory requirements for Nationally Significant Infrastructure Projects to deliver Biodiversity Net Gain.

The Wildlife Trusts (TWT) welcome the National Infrastructure Committee's expanded remit with regards to climate and nature including the need to "consider potential interactions between its infrastructure recommendations, the government's legal target to halt biodiversity loss by 2030 and implementing biodiversity net gain"[2]. We also welcome the value the National Infrastructure committee places on natural capital, as outlined in the Natural Capital and Net Gain Discussion Paper[3]. To ensure that infrastructure development leaves the environment in a better state, TWT has a number of recommendations which we would like to discuss with the National Infrastructure

[1] Blueprint for PR24
[2] Remit letter to the National Infrastructure Committee
[3] https://nic.org.uk/studies-reports/natural-capital-environmental-net-gain/

Commission (NIC), as highlighted in box 1. The delivery of these measures will ensure sustainable delivery of economic infrastructure as well as the government's legal target to halt biodiversity loss.

1. A national policy statement for land and sea use which places the environment at the heart of decision making. This would integrate, when produced, the national policy statement on environmental principles.
2. A strategic spatial plan for land and sea which helps to inform strategic infrastructure needs and locations for the next 30 years. This plan will prioritise land and sea use to ensure that key priorities such as net zero and nature's recovery can be achieved.
3. A strategic spatial infrastructure plan for land and sea which feeds into the wider strategic spatial plan for land and sea (recommendation 2) and adheres to the national policy statement for land and sea.
4. Integration of a natural capital assessment into planning decisions.
5. Planning reform to support recommendations 1-4.

Box 1: TWT recommendations to allow the sustainable development of economic infrastructure and nature's recovery.

Question 2: What changes to funding policy help address the Commission's nine challenges and what evidence is there to support this? Your response can cover any number of the Commission's challenges.

Particularly for energy projects, strategic approaches are required to address environmental impacts in order to allow development to take place. For example, offshore wind farm projects are struggling to identify compensation at a project level which is placing both nature recovery and net zero at risk. For offshore wind it is clear that the cumulative impacts of the scale of development cannot be addressed solely at project level by individual developers. The delivery of strategic environmental compensation measures may benefit from the pooling of funding to deliver measurable change. Policy is required to support this approach as the current system does not encourage collaborative or strategic approaches

Question 3: How can better design, in line with the design principles for national infrastructure, help solve any of the Commission's nine challenges for the next Assessment and what evidence is there to support this? Your response can cover any number of the Commission's challenges.

The design principles for national infrastructure go to some lengths to address the need to identify opportunities which will benefit the environment. However, missing from the design principles is emphasis to avoid, mitigate and compensate negative environmental impacts from national infrastructure before benefits to the environment can be established ('mitigation hierarchy'). The 9 challenges identified by the second assessment baseline report will certainly be more achievable if infrastructure projects avoid and address environmental impacts sufficiently. This is essential to ensure that nature has a chance to recover. The earliest possible engagement with local ecological experts is a critical at both the strategic and project level. Based on the current approach to national infrastructure projects, we expect to see further decline to nature.

We welcomed the recommendation in the design principles for national infrastructure projects to seek to deliver a net biodiversity gain, contributing to the restoration of wildlife. With the

Environment Act 2021[4], now mandating Biodiversity Net Gain for NSIPs, we suggest the Commission update the principles to make it clearer that achieving BNG will be a must-do requirement for these projects (from 2025), and for this to be achieved it will be vital that impacts on biodiversity are firstly avoided and where not, appropriately mitigated and compensated.

Question 4: What interactions exist between addressing the Commission's nine challenges for the next Assessment and the government's target to halt biodiversity loss by 2030 and implement biodiversity net gain? Your response can cover any number of the Commission's challenges.

As recognised by the National Infrastructure Committee baseline report, national infrastructure developments can have a negative impact on biodiversity. Evidence suggests, as outlined further in the response below, that national infrastructure projects are further contributing to the decline in biodiversity. TWT welcome the legal remit for Nationally Significant Infrastructure Projects (NSIPs) on land to deliver biodiversity net gain as outlined in the Environment Act, and we are engaging with Defra and numerous other organisations on marine biodiversity net gain. However, the fact is that NSIPs are not adequately mitigating or compensating for negative impacts on the environment, which is resulting in further biodiversity loss. This needs to be addressed in stronger policy and decision making, and through strategic spatial planning that is informed by spatial planning for nature. This would allow sites that are important for nature to be avoided, applying the mitigation hierarchy at a strategic level. Without stringent and consistent application of the mitigation hierarchy - avoiding, mitigating, compensating impacts - biodiversity net gain will not be achieved and we will continue to see a net loss in biodiversity.

Stronger alignment on national infrastructure policy and the Environment Act is required. This includes national infrastructure policy which:

- Ensures a halt in the decline in species abundance
- Ensures a duty to enhance biodiversity, not just conserve.
- Integrates with environmental principles, environmental improvement plans, local nature recovery networks, and protected species and site strategies.

TWT also support that "natural capital frameworks and analysis should be used in decision making for infrastructure". Although assessment of environmental impacts takes place, an assessment of impacts on natural capital is missing from existing legislation or policy and therefore is not taken account in decision making. TWT welcome that the NIC intends to produce natural capital principles, which could go some way in progressing the integration of natural capital in decision making.

Below we outline more detailed information on interactions between nature's recovery and some of the Commission's identified challenges.

Meeting net zero

TWT support action to tackle climate change and recognise the serious threat to nature if action is not taken. However, we also face an ecological emergency with 41% of species in decline in the UK[5]. There is an inextricable link between the climate and nature crises, which means efforts to solve one crisis will be futile if they do not also address the other. This was formally recognised by both the 197 Parties to the COP26 Glasgow Pact, and all 195 member governments of the IPCC. Consequently, fulfilling UK ambitions for energy infrastructure as a major decarbonisation pathway to limit climate

[4] Environment Act

[5] State of Nature Report 2019

change will fail if they do not achieve environmental protection, recovery and enhancement of marine and onshore environments.

Based upon the current approach to energy infrastructure projects, particularly offshore wind, TWT expect to see further decline in biodiversity. The current situation is that offshore wind farm developments are causing further decline to nature and a loss of natural capital. This includes impacts on natural capital such as the sea's ability to contribute to climate change adaptation in terms of the loss of habitat and therefore carbon sequestration. For example, a number of Marine Protected Areas are in unfavourable condition due to the impact of offshore wind farm infrastructure such as Inner Dowsing, Race Bank and North Ridge SAC[6]. In addition, we expect further decline in a number of Marine Protected Areas due to the Secretary of State for BEIS consenting projects with inadequate compensation which does not meet the requirement of the Habitats Regulations. This includes:

- Further decline in North Norfolk Sandbanks and Saturn Ridge SAC, one of the best examples of open sea, tidal sandbanks in the UK as a result of inadequate compensation for impacts from Hornsea Three Offshore Wind Farm.
- Further decline in The Wash and North Norfolk Coast SAC, one of the largest expanses of sandbanks in the UK as a result of inadequate compensation for impacts from Hornsea Three Offshore Wind Farm.
- Further decline in Haisborough, Hammond and Winterton SAC, another subtidal sandbank which is an important area for commercial fish such as plaice.

The National Infrastructure Commission baseline report identifies that the decarbonisation of electricity sector needs to happen fast. TWT suggest that for this to be delivered sustainably, the recommendations in Box 1 in response to question 1 must be implemented. TWT also recommend the integration of strategic mitigation, compensation and marine biodiversity net gain at a policy and delivery level to ensure the best outcome for nature and least conflict for energy infrastructure projects in the future. TWT would welcome further engagement with the NIC to explain our recommendations in more detail. TWT are making these recommendations to Defra, BEIS, D-LUCH and The Crown Estate, who we engage with regularly from an officer to Director/Minister level.

Although the commission does not plan to look at wastewater emission in part due to the net zero ambitions of the water sector, it is worth noting that the industry's net zero route map, whilst welcome, does not yet consider Scope 3 emissions. In addition, whilst the water and flood resilience sectors are not responsible for direct emissions in the same way as the power generation sector are, their reliance on other sectors means that consideration of their climate footprint is important. In both sectors, the use of nature-based solutions should be pursued as a means of limiting emissions associated with the carbon-heavy alterative of grey infrastructure.

Biodiversity Net Gain

TWT welcomes the inclusion of biodiversity net gain (BNG) for land NSIPs in the Environment Act and will be responding to the live Defra consultation on this (we would be happy to share the relevant sections of our response on BNG and National Infrastructure Projects with the NIC, once submitted) Ideas are still developing on marine BNG. TWT has been actively involved in discussions and part of

[6] Natural England Condition Assessment for Inner Dowsing, Race Bank and North Ridge SAC

a group which has recently produced a report on marine BNG[7], which we would be happy to discuss in more detail with the NIC.

The NIC Natural Capital Discussion Paper identifies the many benefits on net gain, of which TWT would agree with. Unfortunately, the current approach does not "save time and money by avoiding the risks of costly and lengthy appeals processes due to environmental concerns". As identified above, projects are not adequately avoiding, mitigating or compensating resulting in environmental decline. This is in fact increasing risk to industry of potential appeals and challenges to projects. For example, in February 2021, the Norfolk Vanguard consent decision was quashed as a result of judicial review proceedings by a local Norfolk resident[8].

Climate Resilience and the Environment

As identified in response to question 1, substantial increase in national infrastructure in the future will have serious negative impacts on ecology, which needs to be recognised as a challenge within the baseline report and recommendations identified as part of the next National Infrastructure Assessment in 2023.

The interrelations between infrastructure and the water environment is a case in point. Data shows that the water sector is particularly vulnerable to the impacts of extreme weather events, due to its significant interrelations with the natural environment. With changes expected to summer & winter rainfall, flooding to infrastructure is a route through which many in society will first experience the impacts of climate change, such as by losing power, or seeing transport routes disrupted (meaning that flooding is liable to impact a vastly greater number of people than just those whose properties are directly flooded). Yet investment in major infrastructure in water resources, wastewater and flood defence to manage these risks is *itself* often damaging to nature, and carbon-heavy, contributing further to climate change. The water environment is also one which lends itself most readily to the employment of nature-based solutions that work with natural processes; such solutions offer an alternative to carbon-heavy grey infrastructure and whilst increasing prevalent in rhetoric, their use in practice still appears limited. The commission could usefully make recommendations that would facilitate the uptake of nature-based solutions across a range of sectors, and which give greater weight to the biodiversity benefits which can also be delivered through such routes – for example via stronger standards for sustainable drainage systems. The adoption of adaptive planning approaches as proposed by the commission can support the greater uptake of nature-based solutions, provided that long-enough lead-in times are factored in to allow catchment- and nature-based solutions to deliver to their full potential. Finally, the recommendation by the commission of a 1 in 500 year drought resilience standard has been impactful in the water sector and we would support further consideration by the commission of resilience standards for other sectors, as these could help to drive delivery of the resilience benefits that can be provided by working with natural processes and natural infrastructure.

Question 5: What are the main opportunities in terms of governance, policy, regulation and market mechanisms that may help solve any of the Commission's nine challenges for the Next Assessment? What are the main barriers? Your response can cover any number of the Commission's challenges

[7] Strategic Net Gain Targets for Coastal and Marine Environments (2021). Offshore Wind Evidence and Change Programme (OWEC). The Crown Estate.

[8] Norfolk Vanguard High Court decision

TWT see one of the main challenges in meeting the nine challenges is conflict between government policies. For example, government energy policy and decision making to meet net zero is being made which is in direct conflict with the Environment Act and the 25-year Environment Plan. The draft Energy NPS itself states that there will be serious negative impacts on ecology in the short, medium and long term, and yet provides no meaningful solutions to how these impacts will be avoided, mitigated or compensated for[9]. The aim of the Environment Act is to halt the decline of nature by 2030, but energy policy is in direct conflict with this. More is needed to align and prioritise government policy to reduce this conflict to ensure government policy is deliverable.

We support the commission's proposal for a multi-modal transport strategy, and believe that the current lack of a holistic, sustainable transport strategy for the whole of England is an existing barrier to the challenges presented. A strategy of this nature should be aligned with: well-designed towns, cities, neighbourhoods and housing developments - with a focus on reducing the need to travel; promoting less carbon intensive forms of transport; securing improved transport technology; minimising private vehicle use (and associated traffic levels, fuel consumption and emissions) - including fiscal measures and car sharing schemes; improving interconnected public transport; and facilitating active travel by creating safe, interconnected active travel routes.

Question 6: In which of the Commission's sectors (outside of digital) can digital services and technologies enabled by fixed and wireless communications networks deliver the biggest benefits and what how much would this cost?
No comment

Question 7: What barriers exist that are preventing the widescale adoption and application of these new digital services and technologies to deliver better infrastructure services? And how might they be addressed? Your response can cover any number of the Commission's sectors outside digital (energy, water, flood resilience, waste, transport).
No comment

Question 8: What are the greatest risks to security of supply in a decarbonised power system that meets government ambition for 2035 and what solutions exist to mitigate these risks?

There is an ever-increasing conflict in government policy between the delivery of energy infrastructure at sea to meet net zero and delivering the ambitions of the Environment Act and the 25 Year Environment Plan, placing both policies at risk. This is putting infrastructure projects at risk from delay and challenge. Alongside the recommendations in Box 1 in response to question 1, TWT also recommend the integration of strategic mitigation, compensation and marine biodiversity net gain at a policy and delivery level to ensure the best outcome for nature and least conflict for energy infrastructure projects in the future. TWT would welcome further engagement with the NIC to explain our recommendations in more detail. TWT are making these recommendations to Defra, BEIS, D-LUCH and The Crown Estate, who we engage with regularly from an officer to Director/Minister level.

Question 9: What evidence do you have on the barriers to converting the existing gas grid to hydrogen, installing heat pumps in different types of properties, or rolling out low carbon heat networks? What are the potential solutions to these barriers?

[9] Draft Energy NPS Appraisal of Sustainability

We see a lack of government holistic energy policy as barriers to energy efficiency. A broad energy plan is required which sits above the Energy NPS and encompasses all scales of energy infrastructure including community schemes, energy efficiency schemes and action to reduce energy demand. Without this, there is increased risk of fragmented policy and decisions which will further contribute to ecological decline. A better balance must be made between expansion of energy infrastructure, and energy efficiency improvements, demand reductions and community generation schemes.

This must also include better join-up across related topics. For example, energy for heat accounts for 17% of UK emissions and a noteworthy proportion of emissions from heat are due to heating of water for use in homes and businesses. As such consideration of energy efficiency should consider the underpinning role that *water* efficiency can play; demand reduction through behaviour change as well as improvements to household-level fixtures and fittings are potentially achieved with much lesser disruption than energy decarbonisation measures, and so offer a good 'early' action.

Question 10: What evidence do you have of the barriers and potential solutions to deploying energy efficiency in the English building stock?
Please see response to question 9.

Question 11: What barriers exist to the long-term growth of the hydrogen sector beyond 2030 and how can they be overcome? Are any parts of the value chain (production, storage, transportation) more challenging than others and if so, why?

As highlighted throughout our response, increasing national infrastructure including hydrogen networks and storage, could have negative impacts on nature if not planned correctly. Ambitions for hydrogen production have implications for water resources, which need to be factored in to Regional Water Resources Plans so that the ecological impacts of increased abstraction can be avoided or mitigated. As highlighted previously, a national strategic spatial plan for infrastructure is required, which fits within a wider plan for land and sea use and includes the recovery of nature at its heart. TWT has already made this case to BEIS as part of our response to consultation on the Energy National Policy Statements.

Question 12: What are the main barriers to delivering the carbon capture and storage networks required to support the transition to a net zero economy? What are the solutions to overcoming these barriers?

As stated in response to question 11, increasing national infrastructure including carbon capture and storage, could have negative impacts on nature if not planned correctly. As highlighted previously, a national strategic spatial plan for infrastructure is required, which fits within a wider plan for land and sea and includes the recovery of nature at its heart.

TWT recognise that Carbon Capture and Storage may play a significant role in reducing carbon emissions through filling the gap whilst we transition away from fossil fuels. However, we dispute the extent it should be relied upon for delivering net zero by 2050. Absolute emissions reductions are needed at a rate unparalleled in history. Investment and reliance on CCS technologies could lead to a deceleration of the fossil fuel phase out, therefore risking deterring emission mitigation[10] as well

[10] McLaren, D., (2020) Quantifying the potential scale of mitigation deterrence from greenhouse gas removal techniques. Climatic Change 162:2411-2428.

as locking workers into unsustainable jobs. It also risks worsening climate change, displacing billions in climate investment, causing social injustice and significantly damaging the environment – all over a critical timescale.

The use of CCS for bioenergy with carbon capture and storage (BECCS) is a particular concern for TWT. Under the Climate Change Committee's Balanced Net Zero pathway[11], meeting biomass demand for BECCS would require converting up to 700,000 hectares of UK land (more than four times the size of Greater London) to grow energy crops, in addition to imports. Reducing the land available for food production risks either greater intensification of agriculture or a reduction in food security. Further, once the carbon costs of pesticide use, fertiliser use, harvesting and transportation are factored in, any climate mitigation may be lower than if the same land was used for another carbon-absorbing activity, such as native woodland expansion.[12] We also call your attention to prior and significant concerns raised by many UK environmental groups and scientists about large scale biomass burning for energy and about the deployment of BECCS.[13]

Even if deployed, CCS should not be relied upon as a long-term sustainable solution, or a licence to continue using fossil fuels, including for blue hydrogen production. Policy is required in the Energy National Policy Statements to state timeframes for when this technology should no longer be required due to the increase in renewable energy sources. Whilst CCS may be part of the suite of solutions to delivering net zero by 2050, it is certainly not the only solution, and it also provides limited additional benefits to people, nature or climate change adaptation, unlike nature-based solutions for example.

In addition, TWT is concerned about the uncertain impacts of CCS in the marine environment. Developers need to clearly demonstrate through evidence and monitoring the minimal impacts from this technology on the marine environment. Further clusters should not progress until information is available to give confidence of minimal environmental impacts.

Question 13: In what ways will current asset management practice need to improve to support better infrastructure resilience? Your response can cover any number of the Commission's sectors.

TWT support many of the recommendations made in Box 3.1 of the baseline report. It is essential that policy to support economic and natural infrastructure are aligned to ensure that the recommendations in the baseline report can be achieved.

In Box 3.1 it is recognised that nature and the biodiversity that underpins it, ultimately sustains the UK economy. It is therefore disappointing that the NIC does not recognise the provision or enhancement of natural infrastructure, natural capital and Nature-Based Solutions (to, both mitigation of climate change, for example carbon capture and adaptation to climate change, for example the amelioration of flooding) as an essential part of the national infrastructure programme. The Commission needs to move from a position of minimising its impacts on nature to actively contributing to nature's recovery. Biodiversity Net Gain is one element of this. We believe that the

[11] Sixth Carbon Budget. The Climate Change Committee, December 2020
[12] Gambling with Biomass: Reliance on BECCS undermines National Grid's net-zero scenarios. EMBER, October 2020
[13] A Statement by Scientists and Economists on BECCs from Forest Biomass, February 2021

National Infrastructure Assessment should also consider where large scale investment is needed in new natural infrastructure to deliver nature-based solutions. Where nature-based solutions can be used to help reduce risk to infrastructure assets from climate change, this would deliver multiple benefits and provide significant value for money.

Asset management is a particular challenge when it comes to the water environment, as demonstrated by the ageing infrastructure of the water sector, and the potentially-severe consequences of failing flood defences. Natural infrastructure, such as sustainable drainage features and natural flood management installations, has a key role to play - both in delivering a service in its own right, and in easing pressures on built infrastructure, thereby aiding resilience. Financial systems biased towards capital rather than revenue expenditure need to change as this not only contributes to the lack of investment in maintenance, but also dissuades the use of natural infrastructure which is often low cost but with (low but) ongoing maintenance requirements.

Asset management in the water environment should also move more towards a system of holistic water management, working with natural processes rather than against them to select the most sustainable solutions and minimise the maintenance workload associated with working against nature. For example, maintenance of lowland watercourses and low-lying land via drainage (such as through the work of Internal Drainage Boards) should also consider opportunities to hold water in upper catchments by taking a catchment-based approach to the management of water, and easing pressure on downstream infrastructure assets.

Challenge 6: Surface water management – the Commission will consider actions to maximise short-*t*erm opportunities and improve long term planning, funding and governance arrangements for surface water management, while protecting water from pollution from drainage.
The Commission will carry out a separate call for evidence on this challenge, as the Commission will deliver this as a separate study and report to government by November 2022, in advance of its other recommendations.

We agree with the need for a more fundamental review of arrangements regarding surface water and welcome the opportunity to contribute to a separate call for evidence on surface water management in due course. We provide some initial points which we suggest the commission considers within this separate study:

- The commission notes infrastructure areas where ‘there is a lot more to be done’ (sector assessment section 1.3) and many of these relate to water. We suggest that this is in part due to a failure to take a holistic view of water management, and that this should be a key strand within the commission’s considerations.
- There is crossover with many of the challenges considered in this baseline assessment, and if not considered here, these interplays should feature in the future assessment. For example, regarding infrastructure and levelling up - The commission notes that some areas such as London ‘perform well overall on economic outcomes but poorly against some quality-of-life metrics’. In urban environments the poor quality of the built environment and limited access to greenspace are often both factors that contribute to this. The provision of high-quality sustainable drainage features in towns and cities offers an opportunity to provide small areas of green (or, blue) space that enhance the urban environment and facilitate engagement with nature, whilst also delivering valuable surface water management services.
- The requirements for, standards applied to, and future maintenance of SuDS (and in particular biodiversity-rich SuDS) should be a key part of the commission’s future

considerations of surface water management. We would welcome requirements which ensure that SuDS are provided across a greater range of developments, and a hierarchy that favours multi-functional SuDS that deliver biodiversity benefits, rather than single-purpose features such as stormwater crates. (The quality of urban watercourses more generally could be considered as part of the commission's work on levelling up; these offer the opportunity to bring nature into the heart of urban spaces yet are often disregarded and over-exploited. Improving the quality of urban watercourses, and access to them, can be a positive way of delivering increased access to greenspace in locations where it is often difficult to create *new* greenspace.)

Question 14: What are the barriers to and solutions for expanding recycling capacity, both now and in the future to deliver environmental and net zero targets?
No comment

Question 15: What is the likely environmental impact of waste streams from construction across economic infrastructure sectors, over the next 30 years, and what are the appropriate measures for addressing it?
No comment

Question 16: What evidence is there of the effectiveness in reducing congestion of different approaches to demand management used in cities around the world, including, but not limited to, congestion charging, and what are the different approaches used to build public consensus for such measures?
No comment

Question 17: What are the barriers to a decision making framework on interurban transport that reflects a balanced approach across different transport modes?
No comment