

## **Response to Consultation on Permitted Development Rights: Supporting temporary recreational campsites, renewable energy and film-making consultation**

Wildlife and Countryside Link, Land Use Planning Group, April 2023

### About Wildlife and Countryside Link:

Wildlife and Countryside Link is a coalition of 70 environmental organisations in England, using their strong joint voice for the protection and enhancement of nature.

This Link response is supported by: Bumblebee Conservation Trust, Campaign for National Parks, Open Spaces Society, RSPB, The Wildlife Trusts, and Woodland Trust.

For more information about this response, please contact Emma Clarke at Link ([emma.clarke@wcl.org.uk](mailto:emma.clarke@wcl.org.uk)).

### Responses to selected [consultation questions](#):

#### **Q1. Do you agree that a new permitted development right should be introduced that will allow the temporary use of land for recreational campsites and associated facilities?**

(Yes/No/Don't Know. Please give your reasons.)

While Wildlife and Countryside Link strongly supports increasing access to nature this must be done responsibly. Camping can harm sites designated for nature conservation and important habitats, including but not exclusively SSSIs, Local Wildlife Sites and ancient woodland.

The impacts from camping can be both direct and indirect and wide ranging: from light, noise, visitor damage and disturbance such as trampling of vegetation and offsite pollution, and can result in a deterioration of ecological condition.

To ensure legal and policy protections are appropriately applied, these developments should continue to go through the full planning application process.

In order to manage this, the Government could look to expand the habitat exemptions for permitted development rights: for example, exempting irreplaceable habitats from specific permitted development rights in a similar way to SSSIs. And for both SSSIs and irreplaceable habitats, including a 15m buffer could further help reduce harm from permitted development rights.

If the Government proceeds with the new right, all article 2(3) land should also be exempted from the new right, including conservation areas, Areas of Outstanding Natural Beauty, the Broads, National Parks and World Heritage Sites. As the consultation document acknowledges in paragraph 17, there are certain areas where it would be appropriate to ensure that local impacts can be considered through a full planning application. This is certainly the case in Protected Landscapes, as these are areas with both high levels of recreational demand and an urgent need to support nature recovery.

**Q6. Do you agree that the permitted development right should not apply on land which is in or forms part of sites of special scientific interest, Scheduled Monuments, safety hazard areas, military explosives storage areas and land within the curtilage of a listed building?**

(Yes/No/Don't Know. Please give your reasons.)

If this new permitted development right be introduced, then we agree that it should not apply to land designated or forming part of a SSSI. However, this is insufficient in itself, as the right should not apply to sites covered by any designation of land for nature conservation purposes, or where there may be a consequential direct or indirect harmful impact upon one.

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**Q7. Are there any other planning matters that should be considered?**

(Yes/No/Don't Know. Please specify.)

This proposal disregards the potential for consequential direct or indirect and potential combined harmful impacts to neighbouring sites of nature conservation importance, whether designated or not. The proximity of land covered by any nature conservation designation or status or of importance for nature should be taken into account in the process of determining whether the use of land (temporary or otherwise) should be permitted for recreational camping.

In order to manage this, the Government could look to expand the habitat exemptions for permitted development rights: for example, exempting irreplaceable habitats and Local Wildlife Sites from specific permitted development rights in a similar way to SSSIs. And for SSSIs, Local Wildlife Sites and irreplaceable habitats, to include a minimum 15m buffer relative to the scale of the pressure to further help reduce harm from permitted development rights.

**Q31. Are there any other limitations that should apply to a permitted development right for solar canopies to limit potential impacts?**

(Yes/No/Don't Know. Please give your reasons.)

The installation of solar canopies needs to consider the current and potential shading from trees to avoid future conflict.

**Q37. Do you agree that the maximum period of time land or a building can be used for the purpose of commercial film making should be increased to 12 months in any 27 month period?**

(Yes/No/Don't Know. Please give your reasons.)

The temporary use of sites for film-making can harm sites designated for nature conservation and important habitats, including but not exclusively SSSIs, Local Wildlife Sites and ancient woodland. The impacts from the temporary use of sites for film-making can be both direct and indirect and wide ranging: from light, noise, visitor damage and disturbance such as trampling of vegetation and offsite pollution, and can result in a deterioration of ecological condition.

In order to ensure legal and policy protections are appropriately applied, these developments should continue to go through the full planning application process.

**Q38. Do you agree that the maximum area of land or land on which the building is situated being used for the purposes of film making should be increased to 3 hectares?**

(Yes/No/Don't Know. Please give your reasons.)

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In order to ensure legal and policy protections are appropriately applied, these developments should continue to go through the full planning application process.