

The Rt Hon Angela Rayner MP
Secretary of State for Housing, Communities and Local Government

Sent by email

10th July 2024

Dear Secretary of State,

Re: Supporting the climate and nature mission through planning reform

Congratulations on your appointment to lead the Ministry of Housing, Communities and Local Government. On behalf of Wildlife and Countryside Link, England's largest coalition of environmental organisations, we are writing to offer our assistance in delivering Labour's climate and nature manifesto mission through successful planning reform.

In order to be successful, on economic as well environmental grounds, planning reform needs to have nature recovery at its core. Nature provides critical natural infrastructure that strengthens the economy and planning for nature can help end the environmental inequality that creates a two-tier society. In the past attempts at planning reform failed because Governments overlooked this, treating environmental rules as an obstacle, ignoring nature's huge importance to communities and the economy. They fell into the trap of trying to speed up development by stripping away rules to protect nature. This fundamental misunderstanding pitted planning deregulation against communities and environmental needs.

There is a better way. We want to stand alongside you to welcome planning reforms that will help recover nature, as well as accelerating the delivery of affordable homes and renewable energy. We were pleased that you recognised the critical importance of nature when you spoke, before the election, about policies to restore habitats and help wildlife thrive being an integral part of planning reform. The Labour manifesto was clear that planning changes would deliver more homes as part of the growth mission, and more renewable energy as part of the climate and nature mission, whilst maintaining environmental protection and promoting nature recovery throughout. We look forward to working with you to put this welcome approach into action, now that it has received a strong mandate from the British people.

We recommend that you deliver your mandate for nature friendly planning reform by:

1. Introducing effective strategic spatial planning that prioritises space for nature recovery. Competing land use demands can be effectively aligned by working out what goes best where. Nature recovery will need more, bigger, better and joined up wildlife habitats and spatial planning can help deliver them. Strategic spatial planning has been a missing piece in the jigsaw for over a decade; Labour's manifesto commitments, including to a Land Use Framework, have the potential to fill in the gaps and create a more strategic approach. In order to be effective, nationwide spatial strategies (including the Land Use Framework, a potential National Spatial Plan and Strategic Spatial Energy Plan) must be co-owned by and applied across MHCLG, DEFRA and DESNZ, with input from other Government departments including DfT. All spatial planning documents must set core objectives to contribute to meeting nature recovery targets in the

Environment Act (2021) and achieving net zero; delivering habitat recovery must be prioritised in the same manner as housing and infrastructure targets. MHCLG should also work closely with DESNZ and other departments to achieve a similar approach at sea, with effective strategic spatial planning delivered through a Marine Spatial Prioritisation Programme. Finally MHCLG should produce overdue guidance, first promised in 2023, strengthening the role of Local Nature Recovery Strategies in planning, to ensure these blueprints for local habitat restoration influence strategic planning decisions.

2. Taking designated nature sites off the table for development. The Government must put into practice its welcome recognition that some boundaries are red lines for nature, showing the same resolve you demonstrated in defending nutrient neutrality rules before the election. Amendments to the NPPF should swiftly affirm that Special Areas of Conservation, Special Protection Areas, Ramsar Sites, Sites of Special Scientific Interest and irreplaceable habitats should not be harmed by development, confirm protections for Protected Landscapes and introduce explicit and strong Local Wildlife Sites safeguards. Amendments to National Policy Statements should clearly carry the same protections over to the infrastructure projects regime, and also better protect offshore Marine Protected Areas with seabed features. This should be accompanied by strengthened management across the MPA network. Any primary legislation embodying further planning reforms should reinforce these protections. This combination of strengthened protections for designated sites and a more strategic spatial approach to planning will effectively set out where development should and should not go, protecting the areas critical to nature and reducing the costly delays that have resulted from uncertainty as to suitable locations for new housing and renewable energy.
3. Building nature friendly design into developments. New built infrastructure should always come with an investment in natural infrastructure. A new biodiversity chapter of the Building Regulations (or alternatively a dedicated National Development Management Policy) should mandate nature-friendly design measures for all housing developments, including suitably designed and located swift bricks, nest boxes, bat boxes, bee bricks, hedgehog highways and green and bio-solar roofs where appropriate, along with publicly accessible nature-rich spaces. Similarly, work with DESNZ could produce mandated nature measures for new renewable energy, including native wildflower planting on land and adherence to ambitious Environmental Standards at sea. These steps would strengthen ecosystems at the same time as helping to address inequalities in access to green space. New homes and other forms of development can have a positive overall impact on nature, if the right design measures are built in from the start.
4. Upping the ambition of Biodiversity Net Gain. The Biodiversity Net Gain (BNG) scheme inherited from the previous Government has real potential to drive nature recovery, but it is impaired by exemptions, a cap on ambition and a lack of enforcement. Speedy closure of loopholes (including a swift extension of BNG to major infrastructure projects), new guidance encouraging local authorities to go beyond 10% net gain and an uplift in resourcing to enable enforcement action could unleash the potential for BNG to deliver meaningful gains for nature wherever development takes place on land. The expertise of MHCLG could also be applied across Government to help rapidly develop Marine Net Gain, to secure significant investment in habitat restoration from development at sea.

The inclusion of these measures in your forthcoming planning reforms would constitute a new and ambitious approach, which has the potential to win the support of all those who care about the environment. The need for new renewable energy to be deployed at scale is appreciated by nature campaigners, who understand that climate change poses the greatest current threat to nature. The assurance that renewable energy infrastructure would be delivered alongside measures to mitigate impacts and boost nature recovery would turn appreciation into active support. Similarly, a guarantee that new residential development will take place away from nature's most precious sites, and the promise of positive improvements for nature through design measures and bolstered BNG, would help allay concerns about the impact of large-scale new development upon the natural world.

We see a rare opportunity for nature and climate organisations to stand together with Government to help progress planning reforms if they take environmental recovery as a part of a new approach to planning. Early adoption of these four policies would be a powerful signal that you will take a better approach to planning reform, and help us to support you.

We hope that you feel able to explore these policy suggestions with us. We would like to meet with you to discuss these policies, and how environmental organisations can provide sustained engagement throughout the planning reforms.

Thank you for your consideration of these policy recommendations and meeting request. We stand ready to work with you to realise the potential of the planning system to help deliver Labour's climate and nature mission, alongside the growth mission.

Yours sincerely,



Richard Benwell, CEO, Wildlife and Countryside Link

This letter is supported by the following organisations:

RSPB

The Wildlife Trusts

Woodland Trust

Friends of the Earth

Campaign for National Parks

ZSL

The Chartered Institute of Ecology and Environmental Management

Hampshire Wildlife Trust

Buglife

Butterfly Conservation

Bat Conservation Trust

Bumblebee Conservation Trust

Froglife
Plantlife
People's Trust for Endangered Species
Freshwater Habitats Trust
Open Spaces Society
Marine Conservation Society
Institute for Fisheries Management
Seal Research Trust
ORCA
Whale & Dolphin Conservation

CC:

Steve Reed OBE MP, Secretary of State for the Environment, Food and Rural Affairs

The Rt Hon Ed Miliband MP, Secretary of State for Energy Security and Net Zero

Matthew Pennycook MP, Minister for Planning, Ministry of Housing, Communities and Local Government

Replies can be sent to matt@wcl.org.uk