

Wildlife and Countryside Link

Lords debate on the draft National Planning Policy Framework

Briefing

October 2011

Wildlife and Countryside Link (Link) welcomes the House of Lords debate on the draft National Planning Policy Framework (NPPF). In the past year Link has engaged closely with the process of formulating the NPPF, submitting formal comments in response to the 'call for suggestions' in February and to the draft NPPF issued by the Practitioners Advisory Group in May. Link has significant concerns with the draft NPPF, and our key concerns are outlined below. For further detail, see our NPPF [consultation response](http://www.wcl.org.uk/docs/2011/Link_response_to_NPPF_consultation_171011.pdf) (http://www.wcl.org.uk/docs/2011/Link_response_to_NPPF_consultation_171011.pdf).

1. The definition of sustainable development

Sustainable development is a well-established concept, with significant cross-sector support. Link strongly feels that the use of the term 'sustainable development' in the draft NPPF is not sufficiently clear. The term should be based on a well-supported and established definition, in order to maintain credibility. In Link's view, a sustainable policy is one that respects all five principles set out in the UK Sustainable Development Strategy. We therefore recommend that these five principles form the basis of the definition of sustainable development in the NPPF; this definition should also have a legal underpinning through the Localism Bill.

2. The 'presumption in favour of sustainable development'

The presumption must express commitment to achieving sustainable development rather than simply being a presumption in favour of development. In doing so it must not weaken the protection for essential national and local designations such as Sites of Special Scientific Interest, Local Wildlife Sites or protected landscapes; at present the interaction between the presumption and natural environment policies is a major cause for concern. Link is also very concerned that the current presumption undermines the plan-led system. There is a clear tension between the presumption and the 'default answer is yes' on the one hand, and on the other hand the ability of local authorities to determine applications in accordance with the development plan and other material considerations. For these reasons we have suggested amendments to the text in the attached Annex; we would be very happy to discuss these further.

3. The strength and scope of the natural environment policies

Link believes that the draft NPPF will move us further away from the Government's own ambitions to both stop the decline of and enhance England's natural environment. The Natural Choice gives 'natural environment' a broad meaning. It covers living things in all their diversity: wildlife, rivers and streams, lakes and seas, urban green space and open countryside, forests and farmed land. Throughout the draft NPPF the language relating to the natural environment is timid and unhelpfully equivocal in comparison to that on other issues; this must be addressed and we have suggested wording in our Annex. Central to our concerns is the draft NPPF's failure to adequately implement policies set out in The Natural Choice. In particular, the NPPF fails to 'retain protection and improvement of the natural environment as core objectives for local planning and development management', without exclusions. It also fails to mention Local Nature Partnerships and Nature Improvement Areas which have a crucial role in delivering environmental enhancement and restoration, and which need the NPPF's support if they are to succeed.

This briefing paper is supported by the following 21 Link members:

- Amphibian and Reptile Conservation
- Badger Trust
- Bat Conservation Trust
- Buglife – The Invertebrate Conservation Trust
- Butterfly Conservation
- Campaign for National Parks
- Campaign to Protect Rural England
- Friends of the Earth England
- Open Spaces Society
- Plantlife
- People's Trust for Endangered Species
- Pond Conservation
- Ramblers
- Royal Society for the Protection of Birds
- Salmon & Trout Association
- The Grasslands Trust
- The Mammal Society
- The Wildlife Trusts
- Wildfowl & Wetlands Trust
- Woodland Trust
- WWF-UK

**For further information please contact Kate Hand at Wildlife and Countryside Link on either:
kate@wcl.org.uk or 020 7820 8600.**



Wildlife and Countryside Link
89 Albert Embankment
London
SE1 7TP
T: 020 7820 8600
F: 020 7820 8620
E: enquiry@wcl.org.uk
W: www.wcl.org.uk

"Bringing voluntary organisations in the UK together to protect and enhance wildlife and landscape, and to further the quiet enjoyment and appreciation of the countryside"

Chair: Paul de Zylva, Director: Jodie Bettis
A company limited by guarantee in England & Wales
Company No. 3889519 Registered Charity No. 1107460