



## Link response: Street votes development orders consultation

2 February 2024

This response is on behalf of nature coalition Wildlife and Countryside Link ([Link](#)).

---

### Responses to selected consultation questions

**Question 13: Do you agree with our proposals for additional excluded areas? If not, please provide details.** [List of excluded areas includes: National Parks, the Broads, World Heritage Sites, SSSIs, AONBs, Green Belt, Local Green Space or Metropolitan Open Land, SAC or SPA.]

Yes, we agree with the proposals for additional excluded areas.

**Question 14: Are there any categories of land or area that you think should be added to the list of excluded areas? If yes, please provide details.**

Yes, street votes development orders should also be excluded from areas on or adjacent to Local Wildlife Sites, irreplaceable habitats, brownfield sites of high environmental value, designated heritage assets (listed buildings, scheduled monuments, registered parks and gardens), and buildings that host protected species.

In order to avoid indirect impacts to these assets and those listed in Question 13, we also recommend an appropriate buffer zone for each one is also exempt.

**Question 18: Do you agree with our proposed design principles? If not, please provide details.**

Yes.



The design principles should also include reference to protecting and recovering nature and biodiversity (not all nature is green space), and promoting climate mitigation and adaptation and sustainable design.

**Question 22: Do you agree with our proposals on the role of the development plan in the street vote development order process? If not, please provide details.**

No. We are concerned that street vote development orders could undermine the existing plan-led system which enables strategic planning in the local area. A plan-led approach allows for local planning authorities to ensure the general sustainability of the location and design of development, assess any potential acute or cumulative environmental impacts in an area, including on species, habitats, local green spaces, climate, infrastructure such as water and transport, and communities. Street votes will also undermine the democratic process of the local plans, which requires full scrutiny open to all stakeholders. Street votes will have implications beyond simply the residents of the immediate street but those other residents impacted will have no voice.

For example, even if no green space is lost due to new development via a street vote development order, additional residents from new development on a street could lead to increased footfall in the local green space. This additional recreational pressure on local green spaces could harm the natural spaces and habitats present.

In addition, even seemingly small developments can cause acute harm to species or habitats, for example, if a species is present but not identified or species protection legislation is not properly applied (as is often the case for permitted development rights), or cause cumulative impacts on species or habitats, which are likely to go unaddressed through individual street vote development orders.

**Question 27: Do you agree with our proposed approach to managing local impacts? If not, please provide details.**

Yes.



**Question 29: Do you think any other impacts should be considered? If yes, please provide details.**

Yes, impacts on local biodiversity (including on areas identified in the Local Nature Recovery Strategy), landscape, heritage, artificial light, and access to nature (including increased recreational pressure on local green and blue spaces) should be considered.

**Question 31: Do you have any views on how the Environmental Impact Assessment regulations should be modified for street vote development orders? If yes, please provide details.**

EIA regulations should not be modified for street vote development orders. Where development reaches the threshold to trigger an EIA, it is of a type or size that could have significant environmental implications and so it must be subject to the EIA regulations without amendment and should be subject to regular planning permission.

If the SoS is to be responsible for making decisions within the EIA process, the SoS should still be required to issue a scoping decision. Scoping is an essential aspect of EIA which allows for identification of key issues and an opportunity to consider and include other perspectives or potential concerns.

**Question 35: Do you think that Biodiversity Net Gain should apply to street vote development in this way? If not, please provide details.**

No, we do not think any changes to BNG are needed to apply BNG to street vote developments. There should be no additional exemptions to BNG for street vote developments.

**Question 50 - Do you agree that conditions requiring a s106 planning obligation should be limited to mitigations which cannot be achieved through condition alone, and which cannot be delivered through Community Infrastructure Levy? If not, please provide details.**

Yes, we agree that a s106 planning obligation should still be required where there are specified essential mitigations, such as mitigation required in consequences of an appropriate assessment under the Habitats Regulations.



---

Wildlife and Countryside Link (Link) is the largest nature coalition in England, bringing together 82 organisations to use their joint voice for the protection of the natural world and animals. Wildlife and Countryside Link is a registered charity number 1107460 and a company limited by guarantee registered in England and Wales number 3889519.

For questions or further information please contact:

Emma Clarke, Senior Policy Officer, Wildlife and Countryside Link

E: [emma.clarke@wcl.org.uk](mailto:emma.clarke@wcl.org.uk)

Wildlife & Countryside Link, Vox Studios, 1 – 45 Durham Street, Vauxhall, London, SE11 5JH

[www.wcl.org.uk](http://www.wcl.org.uk)

The following organisations support this response:

Bat Conservation Trust

CPRE – The countryside charity

Friends of the Earth

RSPB

Woodland Trust