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20 August 2020

### **Planning reform**

Dear Secretaries of State

The Planning White Paper is an opportunity to integrate your environmental programme with the planning system. However, considerable changes would be needed. We are concerned that the current proposals would weaken protection for nature in areas designated for growth and renewal, while offering no additional environmental safeguards in areas earmarked for protection.

The planning system could certainly be improved. Today, provisions for reducing environmental impact in the planning system focus on preventing and mitigating harm. Thanks to the rules for site-based protected in the Habitats Regulations, this has been relatively effective in reducing the loss of habitats and species without slowing down development, but it has been far from enough to turn the tide in nature's decline.

By reforming the planning system to take a more strategic approach to restoring nature and to give greater weight to the need to avert climate change and support ecosystems, costly delays could be reduced in a way that helps deliver new homes and the objectives set out in the 25 Year Environment Plan. This approach can also help to provide high quality, accessible natural spaces near where people live to ensure that everyone can benefit from a healthy natural environment.

Separately, the Government has made important proposals for the development of Local Nature Recovery Strategies and a Nature Recovery Network. Unfortunately, these ideas are compromised by the lack of statutory force in the planning system. In the Environment Bill, there is currently only a weak duty to "have regard" to LNRSs in setting local environmental policies, with no link to day-to-day planning or spending decisions. The NRN has no legal identity at all.

By integrating planning reform and proposals for nature's recovery, the Government can deliver both better.

### **New areas for nature and natural infrastructure**

We recommend that the White Paper proposals are improved making "Highly Protected Areas" and "Nature Recovery Areas" the zonal articulation of Local Nature Recovery Strategies, giving them direct influence in the planning system. They should add up to an effective Nature Recovery Network. They could also help ensure that 30% of the land is managed for nature, mirroring the Government's oceans leadership on land ahead of critical global negotiations in 2021.

Including the concept of “Highly Protected Areas” could help to reinforce the protection already afforded by site designations, such as SSSIs, by incorporating other important sites like Local Nature Reserves and Wildlife Sites alongside ancient woodlands and trees, peatlands and other priority habitats in an area with a legal presumption against development that results in their loss. It should include a suitable buffer to ensure indirect damage is also avoided.

Wider “Nature Recovery Areas” should be identified in each local plan where nature is currently degraded but there are real opportunities for recovery. Planning permission in principle would be given for environmental investments and new restrictions would be set for hard infrastructure. These areas could provide space for large-scale rewilding projects, enhancing areas of designated Green Belt, nature corridors through the landscape, or “tier 3” Environmental Land Management projects, providing a focus for national and local environmental investments. They could also support the work of a National Nature Service – a Government funded programme that trains and employs particularly young people in environmental skills – and provide wildlife corridors into the heart of our towns and cities.

### **Improving decision-making in growth and renewal areas**

Of course, allocating zones for nature should not mean that other areas become a free-for-all for development. The protection of core areas is not enough to reverse nature’s decline, give everyone equitable access to a healthy environment and create a resilient economy. The wider nature recovery network must be incorporated in all areas of planning, alongside effective environmental safeguards. In particular, we are concerned that a blanket approach to redeveloping brownfield sites risks abandoning important wildlife-rich brownfield and urban nature sites, which can be highly significant for nature. We support the proposed ‘brownfield first’ focus where it involves the use of land that has been shown to be of low biodiversity value.,

Biodiversity net gain must be achieved in all areas, and we support the proposals for a much better environmental information base to inform decision-making, integrating environmental considerations upfront in a more strategic manner by mapping out important habitats in advance. To use evidence successfully, Local Authorities will need to have access to much richer information, systems, and the support of ecologists, tree officers, environmental planners and data managers. Use of appropriate environmental information upfront can create more certainty for developers and reduce costly delays, as well as helping to protect nature.

Critically, though, these more strategic approaches can never entirely replace the need for site-specific historical data and new survey work to determine whether development should be allowed, that investigates opportunities or sensitivities for habitats and species that might not have been picked up in early, generic mapping exercises.

### **Zero carbon ready homes**

The proposals make clear that the Government intends new homes to produce 75–80 per cent lower CO<sub>2</sub> emissions compared to current levels, making them ‘zero carbon ready’ for the future. Tackling household emissions will be important in meeting the UK’s net zero emissions target by 2050, but we want to see the Government go further. To build on recent announcements on energy efficiency measures, the Government should also introduce minimum energy efficiency standards for new and existing homes to at least EPC band C by 2035 (2025 for low-income households), alongside wider environmental standards, including provision for building-reliant species such as bats and swifts. This

would help put the housing sector on track for net zero, help low income households save money, and could create more than 100,000 net new jobs annually between 2020 and 2030. It can also provide a clear market signal to attract investment, create a suitable skills pipeline and drive down installation costs.

### **A joined up approach**

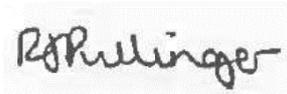
By integrating the Government's environmental ambitions in the planning system, we can make best use of England's scarce land resource at the same time as supporting well-functioning ecosystems and ensuring that every community can benefit from nature.

Investment in natural infrastructure can be just as effective an economic stimulus as conventional infrastructure and will support a more resilient economy and communities in the long run.

Identifying new "Highly Protected Areas" and "Nature Recovery Areas" would improve certainty and reduce costs in the planning system, at the same time as ensuring that it contributes to nature's recovery and a more resilient and greener economy. However, it is essential that this is underpinned by effective environmental protection and better data in all planning areas.

We would be delighted to discuss these proposals with you in more detail if that would be helpful.

Yours sincerely



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