

Wildlife and  
Countryside



**Wildlife and Countryside Link response to Planning Reform: Supporting the high street and increasing the delivery of new homes**

Response by Wildlife and Countryside Link

*14<sup>th</sup> January 2019*

Wildlife and Countryside Link (Link) brings together 49 environment and animal protection organisations to advocate for the conservation and protection of wildlife, countryside and the marine environment. Link is the biggest coalition of environmental and animal protection organisations in England. Our members practice and advocate environmentally sensitive land management, and encourage respect for and enjoyment of natural landscapes and features, the historic and marine environment and biodiversity. Taken together we have the support of over eight million people in the UK and manage over 750,000 hectares of land.

The following organisations support this response:

Campaign to Protect Rural England  
Bat Conservation Trust  
Buglife  
Friends of the Earth  
Open Spaces Society  
Wildfowl and Wetlands Trust  
Wildlife Gardening Forum

Wildlife and Countryside Link supports the redevelopment of suitable brownfield sites to deliver new homes. However, we are concerned that the expansion of permitted development rights to provide additional new homes (Questions 1.9-1.20) runs counter to a plan-led system and will fail to deliver well-designed homes, as the consultation document claims in paragraph 1.13. In addition, it will stymie effective place-making and reduce developer contributions that are essential in supporting the protection and enhancement of green infrastructure. As a result we feel that a permitted development right to provide additional self-contained homes by extending certain premises upwards does not play a role in a plan-led system and we urge the government to reconsider this proposal (question 1.9).

Design codes must provide an important role in improving outcomes of permitted development rights to reflect the range of local circumstances (question 1.10). However, site allocations in local and

neighbourhood plans and local and neighbourhood development orders should be used instead to bring forward this kind of development, in a controlled, well designed manner that allows for appropriate levels of consultation with those that would be affected.

The range of local circumstances, and the complex and unknown nature of the questions 1.11-1.16, serves to illustrate that a planning application would be a more appropriate process to go through if adding additional storeys to existing buildings. This would enable other issues such as the provision of sufficient bicycle storage, access and impact on wildlife to be appropriately considered given the potential scale and impact of the development.

The Government should also take the opportunity of the review to clarify how European Protected Species should be considered as part of Permitted Development. There continues to be a great deal of uncertainty amongst Local Planning Authorities (LPA) about the need to consider European Protected Species (EPS) as part of Permitted Development. Whilst it is not disputed within Government that all development, including under permitted development rights, must comply with all relevant legislation and regulations, including EU regulations such as the Conservation of Species and Habitats Regulations 2017, until this clarity comes from a Government source it will not be heeded. This uncertainty has resulted in inconsistency in approaches taken by LPAs across the country, with EPS not being given any consideration in a significant proportion of LPAs. CIEEM, ALGE and BCT have produced [guidance](#) on this issue, and Link members would be happy to engage with MHCLG to update the relevant Planning Practice Guidance to add the clarity needed.

*For more information, please contact:*

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<sup>i</sup> “For the WCL definition of suitable brownfield sites please see this link:  
[https://www.wcl.org.uk/docs/WCL\\_brownfield\\_register\\_guidance\\_final.pdf](https://www.wcl.org.uk/docs/WCL_brownfield_register_guidance_final.pdf)”