



## Planning for Nature

The planning system could play a critical part in meeting net zero and achieving nature's recovery.

At the moment, however, it is failing to prevent unsustainable development from harming nature. In the words of the State of Nature report: 'development for housing, industry and infrastructure projects... result in a loss of natural habitats, as well as fragmentation and change to those that remain'.<sup>1</sup>

The ongoing destruction of habitats is incompatible with the Government's new Environment Bill target to halt the decline in species abundance by 2030. The scale of loss can be illustrated by the fact that grassland habitats the size of Dorset have been lost to development in Great Britain since 1990.<sup>2</sup> Over 1,000 ancient woodlands are under threat from development.<sup>3</sup>

The approach set out in the 2020 Planning White Paper would make things worse. Scaled back environmental assessments and reduced community engagement would allow more developments to proceed on sites important to nature. Increasing building in the wrong way and in the wrong locations would take place at a considerable environmental cost. This cost is unnecessary, as nature positive planning allows the right homes to be delivered in the right places without harming the environment.

**The decision to pause the Planning Bill and to rethink these proposals is welcome. It provides an opportunity for a fresh approach to planning reform. We recommend a new programme of reform:**

- (1) Require planning decisions to contribute to the achievement of environmental goals (net zero and halting nature's decline), informed by Local Nature Recovery Strategies.
- (2) Improve the system of environmental designations by:
  - a. Completing and strengthening the network of protected sites, applying strict levels of protection afforded to the National Site Network to SSSIs and Ramsar sites.
  - b. Strengthening statutory nature duties in designated landscapes.
  - c. Creating a new designation recognised by the planning system for nature's recovery and strengthening protection for irreplaceable habitats like ancient woodland.
- (3) Unify and upgrade the system of Environmental Impact Assessment and Strategic Environmental Assessment: ruling out areas unsuitable for development and linking assessments directly to planning conditions.
- (4) Set a legal standard for everyone's access to a thriving natural environment, both for new developments and redevelopments.
- (5) Ringfence funds from developer contributions for restoring nature, keeping site-specific contributions, and scaling Infrastructure Levy nature funds in line with environmental need.

<sup>1</sup> <https://www.rspb.org.uk/our-work/state-of-nature-report/>

<sup>2</sup> <https://www.ceh.ac.uk/press/almost-2-million-acres-gb-grassland-lost-woodland-and-urban-areas-expand>

<sup>3</sup> <https://www.woodlandtrust.org.uk/press-centre/2020/01/thousand-threatened-ancient-woods/>



## 1) Require planning decisions to contribute to the achievement of environmental goals

Too often, the purpose of planning is narrowed to development. An overriding focus on housing numbers and growth has left little space for broader strategic considerations for how we use our land in the most effective way to deliver a range of government priorities: including nature's recovery. The Government should lead its planning reforms by establishing a clear environmental purpose for planning that should be considered in all decision making.

The Planning Bill should establish a clear duty, in exercising functions under planning law, to contribute to delivery of the following statutory objectives:

1. Section 1 of the Climate Change Act 2008: planning should contribute to meeting Net Zero.
2. Section 1 of the Environment Act 2021: planning should contribute to nature's recovery and, in particular, to meeting the target to halt the decline of biodiversity by 2030.

This would rebalance day-to-day decision-making to ensure the planning system is about strategic land use choices to benefit society, economy and environment, not simply about delivery housing numbers.

### Give Local Nature Recovery Strategies material weight in the planning system

Delivery of an enhanced environmental purpose will require the *coordination* function of the planning system to be strengthened. An effective system can do more than simply carve out areas for different functions: it can coordinate private and public policy action to help get the most out of our land. The Planning Bill can ensure that the new environmental coordination tools - Local Nature Recovery Strategies (LNRSs) - fulfil their potential.

The Environment Bill requires authorities to prepare a LNRS with a statement of biodiversity priorities and a habitat map, identifying areas that could contribute to environmental improvement. LNRSs have the potential to drive nature's recovery, bringing together different policies and mechanisms and enabling local expertise to coordinate habitat protection, restoration and creation across England.

Unfortunately, this potential looks set to be missed, as the duty on planning authorities is simply to "have regard" to LNRSs in making environmental action plans, with no requirement to apply them in Local Plan preparation and the individual planning decisions that drive habitat destruction, preservation and creation. This means LNRSs risk being ineffectual documents; paper tigers promising much, but removed from the decisions that will influence real change.

The Planning Bill can rectify the shortcomings of Local Nature Recovery Strategies by giving them material weight in the planning system. A duty on local authorities to take LNRSs into account in planning decisions would allow LNRSs to provide a spatial plan for nature, setting out the areas where development should be avoided, as well as helping connect important nature sites together.



With these reforms, LNRSs could become the green counterpart to local plans. Just as local plans change the areas they cover, LNRSs would help integrate different policies and target action to transform areas with new connected spaces for nature.

## **2) Improve environmental designations**

Effective environmental planning requires a strong network of areas protected or designated for nature. We propose three main changes: “levelling up” and completing the protected site network; helping landscape designations work for nature; and creating strong new planning designations for nature’s recovery.

### Completing the protected site network

Currently, the network of Sites of Special Scientific Interest (SSSIs) is a “representative network”. The Government should invest in and streamline the process for designation to rapidly complete the network, safeguarding the remaining fragments of priority habitats and important places for wildlife around the country.

At the same time, the Government should strengthen the protection provided by SSSIs. As things stand, SSSI status is only a consideration in planning decisions, rather than a firm defence. This is weaker than the protection provided by the National Site Network (SACs and SPAs), which are protected from adverse effects except for reasons of overriding public interest. This disparity in levels of protection increases costs and uncertainty, leading to inappropriate and expensive speculative planning applications. Fewer than 40% of SSSIs are in favourable condition, often as a result of damaging planning decisions in or in the vicinity of the SSSI.

The Planning Bill should mandate the completion of the SSSI network, with an expedited process for designating sites. It should end the “two tier” status of our finest wildlife sites by applying the level of strict legal protection currently enjoyed by the National Site Network (under the Habitats Regulations) to all SSSIs and Ramsar sites.

### Designated landscapes

The Glover Review proposed that the requirement on National Park and AONBs authorities to give ‘due regard’ to the statutory purposes of designated landscapes be strengthened to one of ‘furthering’ those purposes. This would help weed out applications that damage the natural beauty, wildlife and cultural heritage of designated landscapes. The Planning Bill should deliver this change, ensuring that the planning system does more to contribute to the environmental purposes of designated landscapes.

This is essential if the Government is to stand any chance of meeting its commitment to protect 30% of land for nature by 2030, a target that relies on portions of the large part of England currently covered by



a designated landscape.<sup>4</sup> However nature within these designated landscapes is currently often in poorer condition than nature outside them.<sup>5</sup>

In order to fund the implementation of Management Plans, additional layers of long-term support are likely to be necessary. The Landscape Recovery component of the Environmental Land Management programme could help support and fund the creation and restoration of habitats at scale in designated landscapes, with payments targeted in accordance with Local Nature Recovery Strategies.

The National Parks and Access to the Countryside Act 1949 and the Environment Act 1995 should be amended to strengthen the environmental purposes of National Parks and AONBs and to require all relevant bodies (including public authorities) to contribute to the development and implementation of Management Plans capable of delivering nature's restoration.

### Planning designations for nature

New designations recognised by the planning system are also an effective way to protect nature.

We recommend that new areas are designated to safeguard land for nature's recovery. These could be identified in Local Nature Recovery Strategies, with strong protection against harm conferred under the National Planning Policy Framework (NPPF).

The new designation could allow LNRSs to identify and secure the protection of land with potential for nature, enabling it to be managed to significantly increase its biodiversity value to support nature's recovery. This would allow land that is currently of low biodiversity value to be designated for nature's recovery at small or large scale, filling a current gap in environmental designations (for sites with currently limited value for nature, but possessing the potential to significantly improve) and speeding the creation of the Nature Recovery Network in England.<sup>6</sup>

There is also an opportunity to deliver improved and new protective designations for our oldest woods and trees. The Government should develop an ancient woodland standard to place the protection of ancient woodland and veteran trees on a statutory footing. While we welcome the concessions granted by Defra as part of Commons consideration of Lords amendments to the Environment Bill, more needs to be done to ensure ancient woodland and veteran trees are better protected. The Standard, or similar amendment, should be brought forward in the Planning Bill, along with the protections for other irreplaceable habitats.

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<sup>4</sup> [https://www.wcl.org.uk/docs/WCL\\_Achieving\\_30x30\\_Land\\_and\\_Sea\\_Report.pdf](https://www.wcl.org.uk/docs/WCL_Achieving_30x30_Land_and_Sea_Report.pdf)

<sup>5</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/925414/1\\_Extent\\_and\\_condition\\_of\\_protected\\_areas\\_2020\\_accessible.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/925414/1_Extent_and_condition_of_protected_areas_2020_accessible.pdf)

<sup>6</sup> <https://www.gov.uk/government/publications/nature-recovery-network>



The England Trees Action Plan committed the Government to introducing planning protections for 'Long Established Woodland' (woodlands that have been in situ since 1840).<sup>7</sup> These protections are urgently needed, especially in the context of Government aspirations to achieve a net increase in tree cover in England. The new protections should be delivered to a high-ambition specification in the Planning Bill.

### 3) Upgrade environmental assessments

The Government has indicated its intention to review and reform Strategic Environmental Assessment (SEA) and Environmental Impact Assessments (EIA), under the Town and Country Planning Regulations 2017 and the Environment Assessment of Plans and Programmes Regulations 2004.

Implemented well, these processes already provide the right information for decision-makers to make good environmental choices, provide confidence to planning applicants, and increase transparency and buy-in from local communities. However, it would be possible to improve the implementation of SEA and EIA to work better for the environment, while being faster for developers to navigate.

An integrated and iterative approach to SEA and EIA must retain the strategic oversight of SEA and the granularity and site-specific assessment of EIA. These processes must be supported by appropriate environmental data and other effective environmental regulations and protections.

Setting site- or project-based environmental assessment within a wider process of strategic assessment can filter out the need for unnecessary EIAs by steering development away from the wrong locations, reducing the extent to which EIA might otherwise be required. Adding decision-making strength to SEA to prevent planning applications from coming forward in areas inappropriate for development will provide increased certainty for developers and lower costs for government, LPAs and eNGOs.

#### A single framework for environmental assessment

We suggest a new four-stage approach.

**Stage 1:** Strategic Environmental Assessment should be conducted for all Local Plans and strategic plans to evaluate the suitability of locations for development.

- SEA should be applied to all appropriate plans and programmes. Plans and programmes that could have significant adverse effects that are currently falling through the gaps. Despite introducing potentially huge cumulative environment impacts, plans for major infrastructure investment in the Oxford Cambridge Arc, a strategic transport plan for HS2, changes to design codes, and the expansion of permitted development rights have not been subject to SEA or have not been properly assessed.
- In order to steer development away from areas identified by an SEA as inappropriate, SEA must have binding weight in the planning system. In order to genuinely inform Local Plans and strategic plans,

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<sup>7</sup> <https://www.gov.uk/government/publications/england-trees-action-plan-2021-to-2024>

the responsible authority should act in accordance with an SEA. No planning application or permitted development should come forth or be approved in areas which an SEA has identified as unsuitable for development. In a zonal planning system, SEA should inform the allocation of zones. In the marine environment, SEA should consider the cumulative impact of offshore wind development along with wider sea space interests on marine wildlife to identify which areas of the seabed are potentially appropriate for development.

- The SEA should be underpinned by appropriate environmental data, including the evidence base from the LNRS. In the coastal and marine environments, SEA should be informed by the Marine Policy Statement, Marine Plans, MPA network and the pursuit of Good Environmental Status (GES). Where there is not appropriate environmental data to adequately assess the suitability of a location for development, SEA should drive the collection and analysis of environmental data.

**Stage 2:** By first steering development away from the wrong locations, robust and well-applied SEA will reduce the extent to which EIA should be necessary. Within those areas where SEA has ruled as potentially appropriate for development, Environmental Impact Assessment should then be triggered for projects.

- Within areas identified by an SEA as potentially appropriate for development, EIA should be applied to all projects that are likely to have significant environmental impacts in line with specified criteria, guidelines and thresholds. Currently EIA is not applied to 99.9% of developments<sup>8</sup> and is not applied to many individual projects that do affect the environment.<sup>9</sup> The thresholds for the application of EIA should be lowered: the regulations setting out what projects are subject to EIA should be amended to widen Schedule 1 development, including expanding screening thresholds to include any development within 100 metres of a designated/protected site of international, national or local importance or irreplaceable habitat, and make Schedule 2 screening more rigorous, including amending Planning Policy Guidance (PPG) notes to lower the thresholds for Schedule 2 screening. The application of the regulations must be improved by increasing the capacity and capability of local planning authorities to conduct screening for EIA.
- In-house ecological expertise in local planning authorities is crucial to ensure robust, consistent information and advice. Early and expert-led project design will allow time to identify stakeholders, existing ecological information, and review local plans and strategies, including the Local Nature Recovery Strategy (LNRS) and associated mapping and offshore, the Marine Policy Statement. National documents like the National Pollinator Strategy should also be considered where appropriate. It also provides an early opportunity to liaise with other EIA disciplines. EIA should be conducted by those with the skills and expertise to screen developments, process and scrutinise EIAs.
- EIA should consider ecological features and connectivity, as addressed within the area's LNRS onshore and the UK's national Marine Protected Area (MPA) network offshore, to ensure bigger, better and more joined-up nature on land and at sea. The impact assessment should consider direct, indirect

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<sup>8</sup> IEMA Report on EIA (2016) EN020016-000986-BFC\_Vol\_09.18.16\_Special Report -The State of Environmental Impact Assessment Practice in the UK - IEMA (2011).pdf ([www.planninginspectorate.gov.uk](http://www.planninginspectorate.gov.uk))

<sup>9</sup> Friends of the Earth EIA Briefing (2020)

[https://cdn.friendsoftheearth.uk/sites/default/files/downloads/September\\_2020\\_Environmental\\_Impact\\_Assessment.pdf](https://cdn.friendsoftheearth.uk/sites/default/files/downloads/September_2020_Environmental_Impact_Assessment.pdf)



and cumulative impacts, with the provision of appropriate guidance and support in identifying and assessing indirect impacts, which partners would be happy to work with Government on.

**Stage 3:** Where sites are identified as potentially suitable for development through this single framework of strategic then site-based environmental assessment, EIA should inform the detailed design to further reduce harm to important habitats, mitigation measures and, as a last resort, compensation measures for environmental impacts.

- Measures should consider direct, indirect and cumulative impacts on habitats and species, with appropriate guidance and support, which partners would be happy to work with Government on.
- Mitigation and compensation should be done onshore in line with the objectives of the LNRS for the area. Developers should consider delivering more than the mandatory 10% gain in biodiversity. BNG on land should be informed by the area's LNRS. In the marine environment, any approach to BNG should be developed with regards to the UK's national MPA network and the achievement of Good Environmental Status.
- Mitigation and compensation measures should be conditioned through the planning application so that these measures must be incorporated in the design of the project or in the planning conditions before permission is granted.
- Mitigation, compensation and BNG measures should be regularly monitored and enforced to ensure that they are being implemented and delivered effectively. This will also identify the need for remedial measures if mitigation and compensation are not meeting consented objectives. Regardless of evidence used as part of the SEA process, where there is significant harm to biodiversity uncovered through an EIA, planning permission should be refused.

**Stage 4:** Finally, data should be made available to reduce costs and inform future planning decisions. Better ecological data enables better ecological assessment, leading to better planning. The Planning Bill should deliver an overhaul of our environmental data system. Data collected through SEA and EIA evidence-gathering and monitoring should be shared and made available and usable for other purposes in accordance with the FAIR data principles to improve the existing environmental evidence base, which can then be mobilised for future environment assessments and inform best practice.<sup>10</sup>

Through a single streamlined framework of environmental assessment that retains the strategic oversight of SEA and the site and project-specific scrutiny of EIA, environmental assessment can continue to collect robust evidence to inform decision-making. Fit-for-purpose environmental assessment regulations that are well-implemented can deliver good environmental outcomes to support nature's recovery and climate mitigation, provide surety and confidence to planning applicants, and increase transparency and buy-in from local communities.

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<sup>10</sup> Fair Data principles (2019) <https://www.fairdata.org.uk/principles/>. FAIR data is findable, accessible, interoperable and reusable.

#### 4) Set a legal standard for everyone's access to a thriving natural environment

Currently, there are marked disparities in access to nature for poorer socio-economic groups and from ethnic minority backgrounds. For example, 40% of people from ethnic minority backgrounds live in the most green-space deprived areas.<sup>11</sup> Children living in deprived areas are particularly vulnerable to "green poverty".<sup>12</sup> Unequal access to greenspace can affect people's quality of life and health, reducing the likelihood of sufficient exercise, increasing the likelihood of mental ill-health, and heightening exposure to air pollution.<sup>13</sup> Overall, unequal access to nature exacerbates social inequalities.

The Planning Bill is an opportunity to improve access to a high quality natural connection for everyone, through legally binding standards for access to the natural environment. These standards could be based on the Accessible Natural Greenspace Standards (ANGSt) from the Green Infrastructure Standards (GISt) framework.

Achieving the standards should be mandatory for new development, and there should be a clear duty to contribute to achievement of the standards in redevelopment and in other local development decisions (such as the provision of safe walking and cycling routes to green spaces).

The standards should include criteria on:

1. **Proximity** – all people should have access to locally and easily accessible green and blue spaces on their doorstep and in their neighbourhood in accordance with the Accessible Natural Green Space Standards (at least 0.5 ha within 200 metres or under 5 mins walk, at least 2 ha within 300 metres of home, 10 ha within 1 km or a 15-20 mins walk, at least 20 ha within 2 km, at least 100 ha within 5km and at least 500 ha within 10 km). Proximity could be measured through GI and ANGSt provision mapping, accessible natural space deficit maps, and woodland access data.
2. **Quality** – to maximise the health and wellbeing benefits to people and the contribution of local green and blue spaces to nature's recovery, the spaces should be natural, biodiverse and managed to enhance nature. This could be measured through NE's GI 'naturalness' indicator, biodiversity indicators and data showing the ecological condition of Local Wildlife Sites and Local Nature Reserves. Green and blue spaces should be designed to maximise co-benefits for nature's recovery, carbon storage, climate mitigation and human health and wellbeing.
3. **Accessibility** – green and blue spaces should be physically accessible and inclusive to all for people to access, use and enjoy. Careful design and management of green and blue spaces, considering physical and socio-cultural factors at the outset and putting local people at the forefront of decision-making are essential to ensure accessibility to all users. Physical accessibility could be measured by assessing the public rights of way network, green routes to local green spaces, access to blue spaces by right of way, and public transport connections for each site.

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<sup>11</sup> [Report finds severe inequalities in access to parks and greenspaces in communities across the UK - Groundwork](#)

<sup>12</sup> [Covid-19 has highlighted the inadequate, and unequal, access to high quality green spaces - The BMJ](#)

<sup>13</sup> [Green infrastructure can limit but not solve air pollution injustice | Nature Communications](#)



Improved access to nature would deliver significant health benefits. People with access to green space live healthier, more productive and longer lives than those without, due to the increased opportunity for exercise and mental health and wellbeing benefits time spent in nature provides.<sup>14</sup>

In his levelling up speech of July 2021, the Prime Minister asked why someone in Blackpool has a life expectancy ten years less than someone living in Hampshire.<sup>15</sup> Part of the answer can be found in unequal access to green space – the amount of public green space per person in parts of Hampshire is over 10 times higher than in Blackpool.<sup>16</sup>

Current green space provision results in estimated savings for the NHS of at least £100 million a year from fewer GP visits<sup>17</sup>, concentrated in wealthier areas. Natural England have estimated that levelling up to give everyone in England good access to green space would reduce NHS pressures to such an extent as to save £2.1 billion in health spending every year.<sup>18</sup>

These health benefits would be in addition to the community benefits of creating greener, more beautiful places to live, and the jobs created by the expansion and maintenance of this green space. The National Trust has estimated that a green space expansion programme would create 40,000 new jobs in urban areas alone.<sup>19</sup>

Setting access to nature standards in the Planning Bill could be the means of delivering this consequential levelling up action, and of securing long terms savings for the NHS.

## **5) Ringfence funds from developer contributions for restoring nature**

A nature-positive planning system can be supported by reforms to developer contributions.

### Retaining site-specific developer contributions, alongside Biodiversity Net Gain

The Biodiversity Net Gain (BNG) system should not be a direct replacement for site-specific developer contributions for nature. BNG provides a narrow biodiversity uplift for habitats and will not deliver other environmental benefits, such as species protection and public access to nature-rich sites.

Even the habitats impact of BNG may be limited to enhancement rather than creation. A study of early BNG schemes found the total area of non-urban habitats decreased by 20% across sample sites, as

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<sup>14</sup> <https://www.mentalhealth.org.uk/campaigns/nature/nature-research>

<sup>15</sup> <https://www.gov.uk/government/speeches/the-prime-ministers-levelling-up-speech-15-july-2021>

<sup>16</sup> <https://friendsoftheearth.uk/nature/access-green-space-england-are-you-missing-out>

<sup>17</sup> <http://www.fieldsintrust.org/revaluing>

<sup>18</sup> <http://publications.naturalengland.org.uk/publication/35009>

<sup>19</sup> <https://www.nationaltrust.org.uk/press-release/new-research-shows-55bn-fund-needed-to-level-up-access-to-urban-green-space-as-part-of-uks-green-recovery>



developers chose to meet BNG obligations through enhancement of existing semi-natural areas rather than by creating new habitats.<sup>20</sup>

A site-specific developer contribution mechanism should continue to form an important part of a future planning system. This would retain the key advantage of the current Section 106 and Community Infrastructure Levy system, namely the ability to reduce the environmental harm of specific developments with bespoke mitigation packages, tailored to the needs of nature on and around that site.

Any new mechanism for developer contributions should require bespoke packages, legally secured to respond to site-specific harms, in a transparent and fair way. A new mechanism should allow for contributions from multiple developments to go towards strategic solutions, crossing authority boundaries where appropriate, to mitigate the collective harm that those developments will do to sensitive and vulnerable habitats.

### Ringfencing the Infrastructure Levy

The 2020 Planning White Paper proposed an Infrastructure Levy as a new developer contribution, with a flat rate to be set each by local authority. The White Paper did not suggest any ring-fencing for the enhancement of nature, or other environmental purposes. Without ringfencing, nature funding may well lose out to the wide range of other areas the levy will cover, including highways, transport and other infrastructure. Currently around 4% of total developer contributions go to the environment, supporting critical measures to protect wildlife and deliver community access to greenspace.<sup>21</sup> It is essential this level is not just maintained but increased, in line with the Government's increased environmental ambitions.

Infrastructure Levy ringfencing would provide a mechanism to tie authority actions to the Government's environmental targets. For example, an authority that is struggling to demonstrate that is contributing to the Environment Bill species target could be required to spend a higher proportion of funds on nature, to help increase progress towards the target. Ringfencing could also provide the funding to progress a new access to nature standard, and to ensure that accessible green spaces constitute more than just close-cut grass, and provide nature-rich, wild spaces for people to enjoy. Funding the delivery of this standard through a ring-fenced portion of the Infrastructure Levy could achieve a levelling up of access to green space, with positive consequences for people and the health service and the wider economy.

A developer contribution package comprising a ringfenced levy, retained site-specific contributions, BNG and nature-positive design standards would accelerate progress towards the Government's environmental targets and nature's recovery. These four elements should be interdependent and reinforcing mechanisms, aligned to direct private finance from development towards environmental aims.

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<sup>20</sup> <https://www.wcl.org.uk/will-biodiversity-net-gain-improve-english-biodiversity-results-from-the-first-evaluation-of-net-gain,-and-whats-next.asp>

<sup>21</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/907203/The\\_Value\\_and\\_Incidence\\_of\\_Developer\\_Contributions\\_in\\_England\\_201819.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907203/The_Value_and_Incidence_of_Developer_Contributions_in_England_201819.pdf) (p45, average over the four years included in table 3.4)



## The benefits of nature-positive planning

Planning reforms to place nature at the heart of planning would help deliver key Government targets for nature and climate, include halting the decline in species abundance by 2030 and reaching net zero by 2050, without inhibiting the building of the right homes in the right places. At the same time, they would help to ensure fairer, healthier and more prosperous places for people to live up and down the country. Creating a comprehensive Nature Recovery Network can be part of the UK's economic recovery and integration too.

The greater the link between nature recovery and planning, the greater the long-term security of new homes. Support for nature is an investment in avoiding further ecological and climate breakdown, and the associated flooding, extreme heat and water scarcity that UK homes are poorly equipped to resist.<sup>22</sup> The Climate Change Committee's 'UK Housing: Fit for the Future' report sets out the vulnerability of UK homes to a range of ecological & climate impacts, including the 1.8 million homes at risk of flooding and the 20% of housing stock liable to overheating.<sup>23</sup> By contributing to nature's recovery, the planning system can avoid these threats to UK homes and create great places for people to live in long term.

The Planning Bill pause is a significant opportunity to deliver key Government nature and climate targets and further the levelling up agenda.

### **Recommendations**

- (1) Require planning decisions to contribute to the achievement of environmental goals (net zero and halting nature's decline), informed by Local Nature Recovery Strategies.
- (2) Improve the system of environmental designations by:
  - a. Completing and strengthening the network of protected sites, applying strict levels of protection afforded to the National Site Network to SSSIs and Ramsar sites.
  - b. Strengthening statutory nature duties in designated landscapes.
  - c. Creating a new designation recognised by the planning system for nature's recovery and strengthening protection for irreplaceable habitats like ancient woodland.
- (3) Unify and upgrade the system of Environmental Impact Assessment and Strategic Environmental Assessment: ruling out areas unsuitable for development and linking assessments directly to planning conditions.
- (4) Set a legal standard for everyone's access to a thriving natural environment, both for new developments and redevelopments.
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<sup>22</sup> <https://www.ippr.org/research/publications/we-are-not-ready>

<sup>23</sup> <https://www.theccc.org.uk/publication/uk-housing-fit-for-the-future/>



*[Wildlife and Countryside Link](#) (Link) is the largest nature coalition in England, bringing together 62 organisations to use their strong joint voice for the protection of wild places and wild animals.*

*Link is pleased to be part of a wider CPRE-led coalition of organisations working on the planning reforms. We support the coalition [asks](#) on climate, access, heritage, democracy and affordable housing, as well as the nature asks articulated above.*

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