



The countryside charity
Sussex

CPRE Sussex
Brownings Farm
Blackboys
East Sussex TN22 5HG
Telephone 01825 890975
info@cpresussex.org.uk
www.cpresussex.org.uk

CPRE Sussex response to the 'Planning Reform Working Paper: Development and Nature Recovery'

<https://www.gov.uk/government/publications/planning-reform-working-paper-development-and-nature-recovery>

1. We are concerned that the 'Planning Reform Working Paper: Development and Nature Recovery' neither recognises nor acknowledges that *"nature, and the biodiversity that underpins it, ultimately sustains our economies, livelihoods and well-being, and so our decisions must take into account the true value of the goods and services we derive from it"*, including *natural capital* and *ecosystem services* (Economics of Biodiversity The Dasgupta Review 2021).

2. We refute the Working Paper's underlying assumption that protections provided by environmental laws must be either removed or weakened because they are obstacles to economic growth, home ownership and the provision of new infrastructure.

Laws protecting wildlife and habitats are not 'growth blockers'

3. It is our experience and informed understanding of the planning process that laws protecting wildlife and habitats are not 'growth blockers', and that the application and enforcement of these laws is not responsible for the under delivery of housing and related infrastructure.

4. This is proven by research undertaken by the Institute for Public Policy Research (Strategic Planning for Green Prosperity, February 2025), which has found that:

"Developers have secured planning permission for over 1.4 million homes since 2007 but have not gone on to build them. Common reasons for this include developers wanting to increase the land's value before selling it on and land banking to slow building rates and maintain high house prices".

"While many blame the planning system, significant non-planning related barriers exist in the delivery of house building, such as developers slowing their build rates or securing permission and then not building. Additionally, the failure to join up key infrastructure projects for development is also slowing the delivery of new homes and economic growth".

5. Extant environmental laws provide much needed protection for at-risk and vulnerable wildlife and habitats (priority species and habitats) that are of national and international importance.

5.1 Such species and habitats are present in locations that lie outside areas of land that are protected through their status as National Parks, National Landscapes, Special Areas for Conservation, SSSIs etc.

5.2 In addition, not all protected priority species and habitats are yet recorded by recording schemes such as those run by Wildlife Trusts or bodies such as UKCEH.

6. Only site-specific surveys can reveal the presence of protected priority species and habitats, and the UK's laws and international obligations – say to the CBD – demand they be protected.

6.1 It is for such reasons that the present and long-standing requirement for developers to submit with their applications biodiversity and ecology surveys and appraisals, listing species and habitats present, detailing impacts and measures needed to enhance ecology and biodiversity, and where necessary measures needed to avoid or mitigate harm.

7. The Working Paper glosses over the Government's intent to remove this requirement, by making unspecified "*targeted amendments to legislation like the Habitats Regulations and the Wildlife and Countryside Act*" (paragraph 11) because in their view, stated in the Working Paper: "*Environmental protections are seen as a barrier to growth, unnecessarily deterring planning applications and hindering the pace at which homes and infrastructure can be delivered*" (paragraphs 1 and 37a).

7.1 Instead, "*impacts will be dealt with strategically in exchange for financial payment (into a nature restoration fund) that helps fund strategic actions, so development can proceed more quickly*" (paragraph 13c), without biodiversity and ecology surveys and appraisals, therefore without knowing whether protected species or habitats are present, and "*no requirement to carry out mitigation work beyond any applicable standard planning conditions related to the design or construction of the development*" (paragraphs 58 and 59).

8. Where these 'strategic actions' would be implemented is not explained. The working paper is silent on many key details such as this. How big would the payment be, who would decide on the rates of payment for destroying various species and habitats, who would implement strategic actions. How would habitats lost in, say, southern England, (say lowland heath) be replaced elsewhere? Habitats are location specific as are many species. The lack of detail on such important points is remarkable.

9. Disturbingly, the Working Paper does not consider the consequences for nature of permitting development on multiple sites without regard to resultant impacts on fauna and flora on those sites, and without knowing whether protected priority species are present.

10. Given the huge and unprecedented housing targets and infrastructure that has and will continue to be imposed by the Government, most of it on green fields, the cumulative impact on nature will be catastrophic.

11. This is unacceptable not least because the UK is one of the most nature-depleted countries in the world, and despite the government committing to protect at least 30 per cent of the UK's land and sea for nature by 2030, we are woefully off target (State of Nature 2023).

12. In addition, the findings of the 'State of Natural Capital Report for England 2024: Risks to nature and why it matters' (Natural England: 9 October 2024) include:

"Due to the state of England's natural capital, society and the economy face substantial risks".

"Nature is at risk. This puts the benefits it provides at risk".

"Declines in nature make the impacts of climate change worse, including flooding and soaring urban temperatures".

"Loss of pollinators is a threat to the crops which depend on them".

"Society has taken nature and its benefits for granted. This results in decisions that cause damage to nature and increases risks for the economy and society. Many seemingly unrelated decisions impact on nature".

"We need to make natural capital central to decision making. Even where the decisions aren't specifically about natural capital".

13. The proposals set out in the 'Planning Reform Working Paper: Development and Nature Recovery' document will, if implemented, damage nature, and increase existential risks for the economy and society.

14. The proposals should be dropped because the chances of the approach succeeding are very remote – at best they would be little more than a get out clause to allow developers to proceed whilst abrogating environmental responsibilities that we all should be bearing.

Professor Dan Osborn: Chair CPRE Sussex

Dr Roger F Smith: Trustee CPRE Sussex

21 February 2025