



Sussex
Wildlife Trust

Contact: Conservation Policy Department
E-mail: swtconservation@sussexwt.org.uk
Date: 28 October 20

By email only
planningforthefuture@communities.gov.uk

Planning for the Future - Consultation on proposals for reform of the planning system in England

The Sussex Wildlife Trust has worked alongside other Wildlife Trust across the country to formulate our response as a national movement and we fully support the detail comments made in the response submitted by The Wildlife Trusts.

The Sussex Wildlife Trust works closely with Local Planning Authorities across Sussex and have decades of experience working collaboratively to get the best outcomes for wildlife through local plan policy, development decisions and design. Sussex Wildlife Trust fully acknowledges that there is room for improvement with the current planning system, but also recognise, planning is necessarily a complicated practice involving multiple sectors and disciplines - trying to simplify it or render it straightforward, risks making it even less perfect.

We cannot afford such sweeping changes to the planning system without placing the natural environment and climate at its heart. It is imperative that any future reforms are informed and underpinned by wider ambitions and legal requirements for the climate and environment, including the Climate Change Act (2008) and the proposed provisions under the Environment Bill (2019-21).

Having considered the information presented in the Planning White Paper: Planning for the future, we draw your attention to the detailed response from the TWT but wish to highlight the following key points in response to the consultation:

Wildlife recovery and people's easy access to nature for health, wellbeing and enjoyment must be at the heart of planning reform. Strategic planning for nature, in which the network of space needed for nature's recovery is identified, mapped and integrated into the planning system, must be applied across all proposed development categories to create wildlife corridors, secure nature's recovery and provide access to nature close to where people live. Any new planning system must align with the objectives of the 25 year Environment Plan and the Environment Bill. **Namely, Local Nature Recovery Strategies and maps must be a legal requirement and be integrated into national planning policy to ensure they underpin local plans and any associated master plans, design codes and guides**

Decisions must be based on accurate ecological data. A full and urgent programme of investment is required to establish high quality ecological data. This must include long-term financial support for a revised Local Environmental Records Centre model that provides the services needed to supply high-quality data to the revised planning system. This will take time, so a transition programme is needed to ensure that any fast turn over to a new planning system does not destroy natural places in the process.

Woods Mill, Henfield, West Sussex, BN5 9SD
01273 492 630 | enquiries@sussexwt.org.uk | sussexwildlifetrust.org.uk

As strategic data does not provide the site-level detail necessary to ensure nature is properly taken into account, timely, site-based survey work and ecological expertise is crucial –where necessary, it should still be possible to revoke permission in principle and outline planning approval, without compensation, if habitats and species of principal importance are found to be present where they were not previously recorded.

Nature protection policies and standards must not be weakened and the mitigation hierarchy upheld. This includes retaining and strengthening nature protection policies in the NPPF, supporting local policies which are tailored to local concerns and ensuring assessment of environmental impacts are undertaken and informed by accurate data and site based survey before development is permitted. There should be a presumption against development that will directly or indirectly result in loss of or damage to protected sites and priority habitats and against development that will negatively impact protected and nationally threatened species. Undesignated sites of biodiversity value (greenfield and brownfield) should not be subject to permission in principle or outline planning permission without prior ecological assessment and effective consultation.

The ecological and climate crises must be addressed by ensuring development contributes to nature's recovery. All developments, regardless of the route by which they are permitted should deliver substantive biodiversity net gains – this must include any permitted through Development Orders or as Nationally Significant Infrastructure Projects. There should also be a new protection designation – *Wildbelt* – to support nature's recovery. This would enable new land that is currently of low biodiversity value, but is intended to be or is in the process of being managed to enable nature to recover, to be protected through designation, and so speed the creation of the Nature Recovery Network to which the Government is already committed.

People and local stakeholders must be able to engage with the planning system at points where it is meaningful to them and sufficient information is available to understand the impacts on nature and on local communities. It is vital that communities are made aware in the consultations of all the issues and opportunities their community faces – including climate and ecological challenges. If the reforms are to be truly equitable and democratic as set out in the introductory paragraphs we would also expect any future planning system to include third-party rights of appeal.

As an organisation the Sussex Wildlife Trust are committed to a sustainable and resilient future for people and wildlife and believe that a reformed planning system can do that if Nature's Recovery is put at its heart.

Yours sincerely,

Laura Brook
Conservation Officer
Sussex Wildlife Trust