

Harmonising Development and Nature Recovery

March 2025

About CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM) is the professional body for over 8,500 members across the UK and Ireland, dedicated to raising the standards of ecological and environmental practice. With a clear vision of a healthy natural environment for the benefit of current and future generations, we support our members in driving positive change – from protecting biodiversity to influencing policy. By setting standards, sharing knowledge and fostering collaboration, we work together to create a more sustainable future for nature and society.

Introduction

In December 2024, the UK Government published *Planning Reform Working Paper: Development and Nature Recovery*. CIEEM responded to this consultation and this summary paper highlights some of the key messages and suggested actions regarding planning and nature recovery for England.

We currently await the introduction of the Planning and Infrastructure Bill to Parliament, for which we hope the below suggestions are helpful.

Key Messages

To summarise our full response, CIEEM's key messages regarding the planning reform proposals are:

1. Nature is not a barrier to development, and nature recovery and development can work in harmony with each other. No evidence is provided to support the proposed reforms.

2. We recommend re-evaluating the proposed approach, suggesting instead that better resourcing and implementing current system would be a more efficient and faster solution.
3. The introduction of a Nature Restoration Fund must not be used to undermine the Mitigation Hierarchy. All plans and projects must always look to avoid and reduce their environmental impact before looking at compensation measures.
4. Early engagement of ecologists and other environmental professionals in plan and project design and development will create certainty and clarity for developers.
5. Adequately resourcing statutory agencies and Local Planning Authorities will allow faster and more efficient discharge of their duties, and also allow for the creation of the conditions required to support private sector finance and investment in nature recovery.
6. Any move to strategic licencing for species beyond great crested newts must be fully evidenced. Government must acknowledge that this approach may likely be inappropriate for other protected species
7. There will be an ongoing need for site-based survey to inform decision-making and plan/project delivery (e.g. Biodiversity Net Gain), as well as monitoring to evidence effectiveness. The collection of these data could be 'frontloaded' into the system, but will still be required.
8. Any reform of the planning system must respect the environment principles: polluter pays, correction at source, and precautionary principles.
9. CIEEM and the considerable expertise within its membership are willing and ready to help the Government to improve the planning system for the benefit of people and nature.

Practical Recommendations

CIEEM recommends the following as additional measures to augment the approach proposed and deliver better outcomes for nature and society, in a development planning context:

- a. Ensure that CIEEM and other relevant bodies are involved in the development of planning policy and not just consulted on it. It is CIEEM members and others who will need to deliver it, and can therefore offer constructive feedback on development of new proposals right from the start.
- b. Use existing tools like Local Nature Recovery Strategies more effectively rather than creating parallel systems.
- c. Provide more funding for each Local Planning Authority to recruit the talent and expertise in numbers that it needs to meet an increasing quantity and complexity of case load and legal duties.

- d. Provide technical training on development planning policy and ecology for local councillors who sit on planning committees.
- e. Develop and implement a robust accreditation scheme and strict code of conduct for private sector consultants to provide technical expertise to Local Planning Authorities and Delivery Bodies.
- f. Produce greater breadth and depth of specific design codes and a mechanism to enforce use. In particular, produce a design code for nature recovery that could inform the content of Delivery Plans.
- g. Produce greater breadth and depth of planning practice guidance (and greater clarity in existing guidance) on what is expected to be in a planning application, including detailed guidance on demonstrating a suitably robust options appraisal stage has been completed to justify the preferred site/design solution taken forward, on a sliding scale of effort depending upon size, type and complexity of development.
- h. Develop an online, collaborative, spatially-explicit tool for Local Planning Authority technical officers, consultees, developers and their consultants to co-design the masterplan for strategic/large/complex development proposals.
- i. Develop a centralised database that collates a standard suite of metrics on planning applications consented and rejected and why, to build up a better picture of what the main reasons are for refusal/'blockers' for planning consent.
- j. Depending upon size, type of development and magnitude of impact, develop clear guidelines for a sliding scale of pre-application requirements for planning applications.
- k. Allow applications for protected species mitigation licenses to be applied for at the same time as planning applications.
- l. Provide policy guidance which clearly sets out the threshold of ecological impact below which further detailed survey information is not required because the risk of significant negative effect can be ascertained with reasonable certainty.
- m. Revisit the Law Commission Review of Wildlife Legislation (2014) to explore alternative ways to streamline nature legislation.
- n. Create a forum for Local Planning Authority officers, consultees, developers and their consultants to share the issues they face and co-create solutions.
- o. Start a national conversation about the value and importance of nature recovery, development planning and good place-making so that the public are motivated to be involved in influencing Local Plans much earlier in the plan-drafting process.

Conclusion

The CIEEM response to the Working Paper raises several concerns about its proposals for the Nature Restoration Fund and Delivery Plan-based approach. Our response recommends re-

evaluating the proposed approach, ensuring that Delivery Plans allow for feedback and address both economic growth and environmental goals.

We challenge the claim that the approach will deliver environmental enhancements at no extra cost, arguing that the previous planning system focused on preventing biodiversity loss rather than actively promoting recovery. We highlight the lack of evidence supporting the idea that enhancements can be achieved without additional costs to developers, even if strategic planning might bring 'economies of scale'.

CIEEM also warns that ongoing changes to policy and legislation create uncertainty, potentially slowing development as developers adjust or delay projects while waiting for clearer processes. We emphasise the need for any policy changes to avoid unintended negative impacts on sectors like forestry and agriculture, which also require planning consent for land management and rural housing.

CIEEM supports strategic approaches where evidence shows that they work, but opposes undermining fundamental environmental protections.

We stand ready to help the Government develop solutions that genuinely work for both development and nature recovery.

Chartered Institute of Ecology and Environmental Management
Grosvenor Court, Ampfield Hill, Ampfield, Romsey, Hampshire, SO51 9BD, UK
enquiries@cieem.net | www.cieem.net
Company Number: RC000861 | Registered Charity (England and Wales): 1189915