

Rt Hon Steve Reed MP
Secretary of State for Environment, Food and Rural Affairs
Department for Environment, Food and Rural Affairs
Seacole Building
2 Marsham Street
London
SW1P 4DF

22nd May 2025

Dear Secretary of State,

I am writing to you on behalf of the Chartered Institute of Ecology and Environmental Management (CIEEM)¹ to highlight our concerns with the Planning and Infrastructure Bill, currently making its way through Parliament.

CIEEM is the leading professional membership body representing and supporting ecologists and environmental managers in the UK. We work to advance the understanding and the standards of ecology and environmental management for the benefit of the natural environment and the public good.

We share the Government's underlying ambition to boost economic growth through well-planned and well-designed development. However, this needs to be in conjunction with a healthy and resilient natural environment that provides the vital ecosystem services which underpin our economy and societal wellbeing as well as contributing to climate resilience.

We welcome the Government's stated ongoing commitment to nature and acknowledge that one of the core principles behind the Bill is to identify environmental challenges early and address them proactively through state-led intervention. However, the execution of this concept is critically flawed. It has therefore been extremely disappointing that, both in the run-up to the Bill and since it has been laid before Parliament, neither DEFRA nor MHCLG has seen fit to consult with the professional body representing development ecologists – i.e. those professionals working directly with developers and planning authorities, who see the problems with the current approach first hand and could have identified and shared more workable solutions.

It is disingenuous of the Minister for Housing to repeatedly state, as he did in the recent Bill Committee sessions, that not supporting the Bill is effectively voting to maintain the status quo in watching over nature's decline. The recent introduction of mandatory Biodiversity Net Gain (BNG) in England is a flagship policy specifically designed to kick-start nature recovery at both a local and strategic level. Despite some inevitable implementation problems there are already signs of beneficial outcomes from high quality BNG delivery.

¹ <https://cieem.net/>

In addition, other measures such as the Local Nature Recovery Strategies currently being finalised and published, the development of new Strategic Licencing for appropriate protected species, the prospect of a new Land Use Framework you have recently consulted on, commitments to restore peatland and woodland habitats, and, hopefully, more investment in a timely and accessible environmental land management scheme to help farmers deliver nature-friendly farming will all turn the dial on nature recovery.

Indeed, Tony Juniper, in accepting a third term as Chair of Natural England, noted: *“We worked closely with government to support the design and introduction of major legislative tools and schemes to support Nature recovery, including via those included in the Environment Act 2021 and the overall commitment to halt species decline by 2030. This was later bolstered by a new Global Biodiversity Framework, that was in some large part achieved by the efforts of the UK, including the need to protect 30 per cent of land and sea by 2030.”*²

Within this context, the assertion that Part 3 of the Bill, which effectively allows on-site habitats and species to be wantonly destroyed to make way for development with the vague hope that it will be restored somewhere else at some future point in time, is quite evidently a catastrophically wrong approach.

The Office for Environmental Protection has been unequivocal in its view that the Bill represents a clear ‘regression’ in climate and nature conservation³ – a conclusion supported by KC legal opinions⁴. At the same time, the Bill threatens to impose additional costs, uncertainty and delays on developers due to the lack of clarity around the nature and scope of the proposed EDPs. So, no win for developers then.

Moving beyond that, there is the shift in responsibility for oversight of the environmental outcomes of development from your department to MHCLG. This public and unjustified downgrading of DEFRA’s oversight and decision-making responsibilities has potentially catastrophic environmental consequences for our country. In its current form, the Bill forces Natural England to follow guidance from the MHCLG – as opposed to guidance from DEFRA – as and when such guidance is published. This sets the Government and MHCLG’s growth priorities above the protection of our natural environment. Furthermore, it strips your department of its published mandate to strategically improve and protect the environment.

This emasculation of DEFRA’s role is deeply worrying and risks your tenure as Secretary of State for the Environment becoming associated with a period in which the Government effectively gave up on nature.

² <https://naturaleland.blog.gov.uk/2025/04/08/two-more-years-extending-ambitions-for-nature-recovery/>

³ <https://www.theoep.org.uk/report/oep-gives-advice-government-planning-and-infrastructure-bill>

⁴ <https://naturespaceuk.com/kings-counsel-opinion-pib/>

& <https://wildjustice.org.uk/wp-content/uploads/2025/05/Planning-and-Infrastructure-Bill-Opinion-29.4.25.pdf>

Crucially we know that our concerns are not only shared by external stakeholders (including developers) but also by many civil servants working in DEFRA and the Statutory Nature Conservation Bodies. Their voices are not being heard in this debate, for obvious reasons, but they care deeply about the environment, work hard to help protect and improve it and their worries are genuine. Their concerns should not be ignored.

To ensure that vital environmental safeguards are upheld, the Bill must restore oversight of the environment to DEFRA. Fears that this will maintain a stagnant development climate are misplaced, as the Government's own impact assessment of the Bill acknowledges that there is very little evidence that protections for nature are a blocker to development.⁵

We therefore urge you to be in the environment's corner in this debate and ensure that the Government rethinks Part 3 of the Planning and Infrastructure Bill. There *are* better and more efficient ways of addressing the ecological impacts of development – as our members know only too well. Please draw a line in the sand over the proposed approach to Part 3 and commit to engaging with those professional ecological practitioners whose livelihoods are dependent on helping development happen in a way that also benefits nature.

Together we can do this so much better.

Yours Sincerely,



Sally Hayns

Chief Executive Officer

Chartered Institute of Ecology and Environmental Management (CIEEM)

⁵ <https://www.theguardian.com/environment/2025/may/07/uk-government-admits-almost-no-evidence-nature-protections-block-development>