

Planning Policy

1. Introduction

Worcestershire Wildlife Trust recognises that development (taken here to mean construction associated with human use e.g. houses, offices, roads and other infrastructure) can have a significant impact on biodiversity and ecosystem services both on and off site. Controls placed on development through the planning system can limit adverse effects and offer opportunities for biodiversity gain, making Trust engagement in planning an important area of its work.

Legislation and planning guidance underpin development control decisions and are in place to prevent biodiversity loss and to promote environmental enhancement and biodiversity gain. The National Planning Policy Framework (the key plank of planning guidance) makes clear that *“Pursuing sustainable development includes seeking positive improvements in the quality of the built, natural and historic environment... Moving from a net loss of biodiversity to achieving net gains for nature... The planning system should contribute to and enhance the natural and local environment by ... minimising impacts on biodiversity and providing net gains in biodiversity where possible... including by establishing coherent ecological networks that are more resilient to current and future pressures.”* Translating this positive commentary into action on the ground requires substantial effort, together with specialist skills that may be lacking in some Local Planning Authorities (LPAs). Accordingly the Trust has a key role to play in turning national policy into practice in Worcestershire.

2. Policy Statement

The Trust will seek to influence and make best use of the planning system to protect and enhance biodiversity and ecosystem functions where possible. It will continue to work closely with Local Authorities, partner organisations and developers to use the planning process to prevent harmful development and deliver best practice in the enhancement of biodiversity and ecosystem functions.

3. Key Themes

In order to achieve the objective outlined in the Policy Statement the Trust recognises that several elements of the planning system must be priorities for its work. Trust engagement will therefore focus on the following key areas.

- a) Policy Input – In light of an evolving growth agenda and uncertainties regarding future planning policy this is a critical area for action. If the policy framework in Worcestershire is robust and correctly implemented by LPAs many planning applications should take account of biodiversity and ecosystem interests without requiring direct input from the Trust. Early engagement with the process offers the best chance for success and may represent the most efficient use of time for Trust officers.
- b) Planning application responses – Some applications, especially large ones, will require direct involvement and the Trust will commit to engaging with all applications

likely to pose risks to biodiversity, or opportunities for ecosystem enhancement when appropriate and where resources allow.

- c) Training for LPAs and others – Increasing others' understanding of biodiversity legislation, guidance and best practice is vital if the system is to deliver effective biodiversity protection and enhancement. The Trust does not have the resources to comment on the specifics of every application so offering guidance, which helps partners to build capacity to deal with environmental issues internally, is fundamental to overall success.
- d) Partnership working and communicating our message – Collaborative working is vital to delivery of this policy and will be an integral component of Trust planning input. Communicating the importance of considering biodiversity, ecosystem function and environmental enhancement in planning to interested parties, together with managing expectations regarding policy and application outcomes among Trust members and the public, will be important.
- e) Resourcing our work – At present the Trust cannot respond to all applications (and may not wish to) but increasing capacity to deliver a robust service to LPAs and members should be a priority, particularly given the rapid growth in development predicted for the next few years.
- f) Biodiversity Offsetting and Payment for Ecosystem Services (PES). These are relatively new concepts, which are gaining traction with Government and are therefore likely to become increasingly important in our planning work in future. Effective engagement will be needed if the Trust is to maximise the potential, and minimise the risks, inherent in each scheme.

4. Practical actions

a) Policy Input

- We will continue to participate actively in planning policy consultations, prioritising work locally but delivering comments on 'regional' and national documents where possible.
- We will seek to influence policy outputs from LPAs and others with the aim of achieving high quality, robust and defensible environmental policies in all relevant plans. We will take appropriate steps to ensure that such policies are included or updated as appropriate.
- We will continue to scrutinise, comment on and influence decisions about site allocations to ensure that harm to biodiversity and ecosystem function is avoided wherever possible. We will use the allocations process to press for biodiversity and ecosystem function enhancements in new strategic developments. In order to take account of potential offsite impacts we will scrutinise sites in a landscape-scale context, including at a river catchment or even larger basis as appropriate.
- We will develop and implement Trust biodiversity offsetting and PES policies guided by national commentary from The Wildlife Trusts and seek to influence offsetting policies and decisions amongst Worcestershire's LPAs.
- We will develop and implement a Trust position statement on Greenbelt, in line with national commentary from The Wildlife Trusts, to be used in the event of significant Greenbelt amendments arising from local and national Greenbelt reviews.

b) Planning application responses

- We will continue to engage in application casework, prioritising our efforts towards those applications likely to pose the greatest risks to, or opportunities for, biodiversity.
- In particular we will seek to engage in all strategic applications coming forward through the local plan process and those sites which because of their size, type or location are likely to have the most impact on Local Wildlife Sites, ecosystem service provision, strategic biodiversity assets or Green Infrastructure (GI) corridors.
- Recognising our resource constraints we will prioritise casework carefully and in line with biodiversity 'importance'.

c) Training for LPAs and others

- We will continue to offer biodiversity training to LPAs (officers and elected members) and others (in partnership with their in-house biodiversity staff where relevant) and promote the need for this training to be taken up.
- We will seek to integrate this training into others' work so that the importance of increasing understanding of biodiversity and ecosystem function, together with recognising the importance of skills in this area, is widely recognised and acted upon.

d) Partnership working and communicating our message

- We will continue to work closely with others involved in the planning process. In particular we will play a full part in the planning elements of the Local Nature Partnership, GI Partnership, and local plan forums. In the short term we will drive GI Partnership working and play a key role in securing GI delivery on so-called 'Game-Changer' sites.
- We will actively seek pre-application involvement for major development and will work with developers and others to secure outcomes that protect and enhance biodiversity and ecosystem functions.
- We will continue to engage with Trust members and the public to explain our planning input and to offer advice and promote best practice to others engaged in planning consultations.
- In line with the Worcestershire Wildlife Trusts Local Group Remit and in order to protect the best interests of local activists and also the authority of Council, all activities carried out in the name of a Trust local group, other than those listed under items 1 to 4 in "Purpose" will require the authorisation of Council. In practice, Council will delegate this authority to the senior staff or their nominated deputy. In the case of planning groups should refer to the Head of Conservation, in the first instance, or their nominated deputy.
- We will work with other Wildlife Trusts, especially our neighbours, to further develop and support the planning function within the Wildlife Trust partnership.
- We will draw up and implement a working protocol between the Wildlife Trust and Worcestershire Wildlife Consultancy to give clarity to the division of work across the planning function.

e) Resourcing our work

- We will keep up to date with planning guidance, legislation and best practice so that our input is well-informed.
- We will maintain and where possible seek to increase our resources for delivery, including by 1) investigating and developing options for recruiting experienced volunteers to help with casework, site analysis and other planning related queries as relevant 2) seeking payment for training provided and 3) seeking short-term funding for focussed planning projects as required.

- We will maintain our Local Sites function and use these sites and Living Landscapes concepts in targeting our efforts.
- We will monitor our effectiveness across the six key themes listed above and amend our planning function as appropriate in light of findings.
- We will review this policy every five years unless major changes in the planning system dictate a need to re-consider our planning work sooner.

Approved by Council April 2017