



Community toolkit: How to influence a development

Buglife is often asked for help when people find out about a development local to them. Our community toolkit will guide you through what you can do to protect rare and endangered invertebrates from development. This part of the toolkit will help you to respond to a planning application so you can influence the outcome of it and take steps to protect rare and endangered bugs.

Don't forget to get your friends and family involved too! The more people that register objections the better. Many applications are decided at Planning Committee meetings by elected Councillors that have responsibilities to their local community. Having a show of local support will make a difference.

Your local authority will deal with most planning applications, appeals and enforcement matters (enforcement is needed where development has taken place without planning permission). They should be your first point of call to find out about a development.

What does local planning policy say?

Once you have more information on the plans it is a good idea to check your local development plan. This will be available on your local authority's website.

Here you can check if the development would be approved in principle as there will be information on sites that have been allocated for development, acceptable size of development and what type of development. There will also be policies describing the long term plans for the area. This will include areas safeguarded for nature conservation, areas for housing, etc. These policies will give you a pretty good idea if a development will be granted planning permission.



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If a site is already allocated in the development plan a development will be more difficult to stop. In this situation your best option may be to ensure the needs of the local community are met by working with the local authority and developer. For example, can an area of green space be included or the design modified to reduce negative impact?

Sometimes new information comes to light that indicates a site is no longer suitable for development.



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For example a site's value for wildlife may have been recognised and the site is now designated.

This change is important as planning law states that a planning application should be decided in line with the local development plan, unless there are very good reasons not to do so - these reasons are termed 'Material Considerations'.

Material Considerations

Identifying the material considerations that will affect whether or not planning permission is granted is essential if you want to influence the outcome.

A material consideration can be anything that relates to planning matters. Examples of material considerations include nature conservation issues/impacts, the presence of protected species, loss of trees, noise/disturbance, layout of buildings etc. There is no final list of what to consider but they must fairly and reasonably relate to the application concerned. Factors that do not class as material considerations include items such as decrease in property value, loss of a view, commercial competition, etc.

If in doubt check with your local council.



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What do I put in my letter?

- The application number and address of the development site. You **must** also include your name and address for the objection to be valid.
- Clearly state your reasons for objection. The easier to understand your points are, the more quickly the planning officer will be able to understand your point of view.
- Back up points of objection with the right laws and planning policy (have a look at our guidance on this). This will add much more weight to your objection.
- Don't point out every single thing that is wrong with the application. Focus on key 'show stoppers'. These will be difficult to overcome and are likely to lead to the planning application being refused.
- Keep the letter succinct and to the point, limiting it to 2 sides of A4. You want to keep the planning officer onside and as the local authority will have many letters to read they may not thank you for a 15 page letter! If necessary include additional detail in an appendix.
- Whilst the planning officer is highly trained they might not have detailed knowledge on rare and endangered invertebrates, so keep things simple to make sure everyone understands the importance of your points.
- Make your letter as individual as possible as planning authorities have been known to lump together identical letters and only class them as one objection.
- Get your friends, family and neighbours to also send in their individual letter too as they will all count when a decision is made.

It might be that a material consideration outweighs the benefits of a development and planning permission is refused. Or, several smaller considerations may lead to planning permission being granted, but with conditions to reduce or remove that negative impact. This might include setting aside a proportion of the site for wildlife and managing this area in the future for endangered bugs.

National policy and legislation count as material considerations. Check our policy guides for each country for more information on this.

What can I do?

Being local to the development site you might have some useful local knowledge that will help to expose the flaws in the applicant's plans.

Or, do you know anything about the invertebrate interest on site?

Bugs often fall through the cracks when a planning application is made and invertebrate surveys are frequently not carried out. Check our guidance on 'When an invertebrate survey is needed' and if you think a survey is required flag this up immediately with the planning authority.

You can also suggest solutions to a problem. On many sites it is feasible to plan development alongside invertebrates - as long as they are acknowledged from the start. This requires good survey work to be carried out and an effective mitigation plan drawn up. (See Buglife's mitigation guidance for more information.)



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Get other people involved!

If you are worried about a new development make sure you let your friends, family and neighbours know too. Local people working collectively can have a very strong voice and influence development significantly.

You could arrange a public meeting to tell the local community about the new development. This can be a great way of getting help and support for your campaign.



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Or you could contact your local paper and radio station. See if you can get them out on site (but get the ok of the land owner first) for an interview and then you can show them the impact of a development first hand.

Once you have evaluated this write a letter to the local authority outlining your concerns, ideas and points. To help with this make sure you look at page two for hints and tips for your letter and page 4 for an example letter.

Further information

Brownfield hub www.buglife.org.uk/brownfield-hub

Buglife survey guidance, mitigation guidance and relevant legislation www.buglife.org.uk/planning

Example letter of objection

Mrs K Field
21 Green Close,
Anytown
ES1 2CD

Dear Planning Officer,

Reference: 15/01234/FUL

Residential development comprising up to 250 dwellings with associated open space and landscaping. Land adjoining 1 Street Road, Anytown, Essex ES1 2AB.

I would like to register my objection to the above development due to the impact on rare and endangered invertebrates and the fact that no ecological assessment has been carried out.

The proposed development site is brownfield and there are records of rare and endangered invertebrates for the site. **The National Planning Policy Framework states that brownfield land should be prioritised for development unless it is of 'high environmental value'.**

No ecological assessment has been submitted with this planning application so it is impossible to know what impact this development will have on wildlife. **Policy CS 17 of the Anytown local development plan states that 'the Council will require ecological surveys and assessments of the site to be undertaken where appropriate to establish the presence or absence of protected species or habitats of particular value prior to any development taking place.'** This application does not meet this policy or the biodiversity aims of the National Planning Policy Framework.

The site is known to support populations of Shrillex carder bee, our rarest bumblebee and the Wall butterfly, which has declined drastically in recent years. These species are protected under **Section 41 of the Natural Environment and Rural Communities Act** and their conservation is a material consideration. They also indicate that the site is highly likely to support other rare and endangered invertebrates and that a thorough assessment of the site must be carried out in advance of any planning decisions. This should include an invertebrate assessment following standard survey guidelines.

The wildlife value of brownfield land is frequently underestimated and these sites can be incredibly important for UK biodiversity, particularly invertebrates. Brownfield sites often have a patchwork of varied habitats such as bare ground, wild-flower rich grassland and heathland. This, combined with the low nutrient content of the soil which prevents fast growing plant species becoming dominant, provides a continuity of resources for invertebrates and other wildlife throughout the season.

Yours sincerely

Katherine Field

National Planning Policy Framework and Natural Environment and Rural Communities Act - Please add the national policy or legislation that relates to whether the planning application is in England, Wales, Scotland or Northern Ireland.

Policy CS 17- Please add the relevant local plan policies for your local authority

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Buglife The Invertebrate Conservation Trust is a registered charity at Bug House, Ham Lane, Orton Waterville, Peterborough, PE2 5UU

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