



21/04/2025

Dear Sir/Madam,

**Re: Planning and Infrastructure Bill – Written Evidence**

Please find my written and concise specialist evidence on the Planning and Infrastructure Bill:

1. I am making this written evidence as I have serious concerns about parts of the Planning and Infrastructure Bill, as an experienced consultant ecologist. I have been professional ecologist for 28 years but have studied wildlife in Britain and Europe for 43 years now.
2. My evidence focuses on the proposed removal by the Government of the mitigation hierarchy and the removal of the requirement to assess sites for a proposed development.
3. The Prime Minister has unfairly blamed bats and great crested newts especially for stopping housing and infrastructure projects in Britain, which I strongly believe is not the case.
4. During the past 28 years that I have been a professional ecologist, not one of my several thousand or more projects have been stopped by protected wildlife species including bats and great crested newts. This is the opposite situation out forward by the Prime Minister.
5. The Government proposes to allow developers to pay a levy into the nature restoration fund, which allows them a licence to basically kill any wildlife on site, without any assessment, as an example. This is a shocking proposal as it would mean that vulnerable wildlife would be killed with no one knowing what was there in the first place, making monitoring impossible by Natural England.
6. The District Licensing Scheme, which is used for great crested newts, is not applicable to any other wildlife species and is still a controversial scheme which allows an unknown number of this species to be killed on development sites. I am still unsure of the actual evidence that this scheme actually works and benefits the species in any way eg the newt population has grown due to more successful breeding ponds, when it could be the opposite.
7. Bats, for example, are completely inappropriate for the District Licensing Scheme, as they are long-lived animals, whose populations are very vulnerable to roost loss. With bat breeding roosts, female bats of a species will gather in sometimes large numbers in one building, as an example. If such a building was destroyed as part of this scheme, then it would wipe out the breeding population of that species from a wide area. If you multiply that scenario across the country, you are looking at local extinction of a

species, which should not be permitted in today's society, especially in a country with already seriously depleted biodiversity.

8. I am also concerned that the proposals within the Bill will actually make the planning process more time consuming and more expensive for developers and home holders, since ecological surveys do not need to be expensive. The levies may well be more expensive than current surveys during the existing process.
9. In regards to what I would like the Government to do in terms of the Bill's progress, I would like amendments to be included in regards to retaining the mitigation hierarchy and the existing requirement for site assessments first, so that mitigation and compensation can be planned properly, that do not result in any protected species and protected habitats being killed or destroyed.
10. I do understand the need to speed up the planning process and I have seen that need over the last 28 years, speaking to my clients. But protected wildlife species and our natural habitats must not be made scapegoats, when the blame lies elsewhere. Such as the late involvement of ecologists in the project development process. Or the lack of funding for local authorities, council ecologists and Natural England.
11. I honestly believe that we can speed up the planning process and build more sustainable housing, for example, without stopping the existing site surveys and mitigation hierarchy. Nature and development are not at war, as this phoney war is just scapegoating for the media and for political purposes.
12. I am happy to provide more information and further serious suggestions for moving forward on this issue, without any wildlife to be killed or protected habitats to be destroyed.
13. In short, the Government must base its planning proposals on hard science and the proposals I have seen within this Bill are not based on any scientific principles, so are therefore not fit for purpose.

If you require any further information, then please do contact me any time on this issue.

Kind regards,

A handwritten signature in black ink, appearing to read 'Andrew S. Waller', followed by a large, stylized flourish or checkmark.

Andrew S. Waller MSc BSc (Hons) MCIEEM  
Director/Consultant Ecologist  
ASW Ecology Ltd