

Communities and Local Government Consultation

Planning and Climate Change

Supplement to Planning Policy Statement 1

**Wildlife and Countryside Link Response
March 2007**



Planning Policy Statement: Planning and Climate Change Supplement to Planning Policy Statement 1

Wildlife and Countryside Link Response to CLG's Consultation

Introduction

Wildlife and Countryside Link (Link) brings together voluntary organisations concerned with the conservation and protection of wildlife, countryside and the marine environment. Our members practise and advocate environmentally sensitive land management and food production and encourage respect for and enjoyment of natural landscapes and features, the historic environment and biodiversity. Taken together, our members have the support of over 8 million people in the UK and manage over 476,000 hectares of land. Many Link members will be responding individually to this consultation. Our joint response therefore focuses on key issues of common concern. It is supported by the following member organisations: Badger Trust, Bat Conservation Trust, Buglife – the Invertebrate Conservation Trust, Butterfly Conservation, Campaign to Protect Rural England, Council for British Archaeology, Council for National Parks, Friends of the Earth, The Grasslands Trust, The Herpetological Conservation Trust, Plantlife, Open Spaces Society, Ramblers Association, Royal Society for the Protection of Birds, The Wildlife Trusts, and Woodland Trust.

Link has published Spatial Planning Guidance which includes a checklist to assist those in developing Regional Spatial Strategies (RSS) and Local Development Frameworks (LDF) that climate change is taken into account (see Annex 1 to this document). Link members also endorsed the TCPA/Friends of the Earth discussion document "Planning Policy Statement 26 – Tackling Climate Change through Planning: the Government's Objectives". We therefore welcome the consultation on a draft Supplement to PPS1 on Planning and Climate Change, alongside the new Code for Sustainable Homes and *Building a Greener Future: Towards Zero Carbon Development*.

Comments

1. Helping biodiversity adapt to climate change

Link considers that positive planning is central to the achievement of sustainable development, and that radical measures are needed to ensure that development is capable of adapting to climate change and does not harm the ability of the natural environment to adapt. Planning should seek to maintain and restore resilient, ecologically functional landscapes and seascapes, which enable species to adapt and move freely in response to climate change. In so doing, planning can support delivery of socially and economically important ecosystem services, such as protection from flooding and sequestration of carbon, all the more important in the climate change context. Link members developed a biodiversity conservation policy on adaptation which was included in the PPS discussion document published by TCPA and Friends of the Earth, with the endorsement of a wide range of stakeholders. This is included as an annex to this response.

Link members supported and input to the development of PPS9 *Biodiversity and Geological Conservation*. We were disappointed that PPS9 did not provide an adequate policy response to climate change impacts on biodiversity, and we look to the new PPS1 supplement to fill this gap. In our view, the draft PPS still does not provide the robust policy framework needed for biodiversity adaptation. It does not give enough emphasis to the role of planning in safeguarding natural habitats and

identifying opportunities for habitat creation. It should recognise the wider benefits (including social and economic benefits) that a healthy ecosystem, a diverse natural environment and the historic character of the landscape can bring to both people and places. They make an important contribution to shaping communities that are resilient to climate change.

We suggest that specific references should be made to the need to safeguard biodiversity and historic environmental assets (within and outwith nationally and internationally important sites), and to identify opportunities, at a landscape scale wherever possible, for improving connectivity and resilience by expanding or creating new areas of habitat, *inter alia* in paragraphs 5, 7, 10, and 19.

The current wording in paragraph 6, stating that RSS should “*sustain biodiversity, and in so doing recognise that the distribution of habitats and species will be affected by climate change*” should be strengthened, to reflect the need to *enhance* (not only sustain) biodiversity, so as to give it the *resilience to adapt to climate change*.

Similarly, the wording included in paragraph 35 should be strengthened, to improve consistency with PPS9 – this should go beyond ensuring “*new development does not...undermine biodiversity*” and refer to the need to *maximise opportunities for habitat creation, and multifunctional greenspaces*.

2. Carbon emissions

Link believes that year on year targets for reducing carbon emissions would provide the most meaningful method of monitoring regional progress towards national targets, and that such targets should be included in RSS. We are concerned that the proposal to express the trajectories as the anticipated carbon emission rate as an average over time will make meaningful reporting very difficult, and will not encourage consistent improvements in emissions reductions. We support the use of regional planning bodies’ and planning authorities’ annual monitoring reports outlined in paragraph 7 (final bullet point), and suggest that these provide a mechanism for reviewing annual emissions reduction targets.

3. The draft PPS and the Planning White Paper

Link supports the bullet point in paragraph 6 of the draft PPS, which calls for the development needs and interests of local communities to be reflected and for communities to be enabled to contribute effectively to tackling climate change. We consider that the siting of all developments (including housing and renewable energy developments) should be determined through an open, plan-led approach, and subject to community consultation and environmental assessment. We suggest that this is somewhat out of kilter with the recommendations for dealing with Major Infrastructure Projects in the Barker Review of Land-Use Planning.

In addition, we suggest that measures to prioritise economic development are difficult to reconcile with the aspirations of the draft PPS, and that the emphasis of the Barker Review threatens to both increase emissions, and to lead to decreased resilience of our landscapes to climate change.

Finally, Barker recommended a reduction in the volume of national policy guidance. We believe that this draft PPS highlights the enormous importance of such guidance.

We trust CLG and the Cabinet Office will be working together with regard to issues such as these towards the production of the Planning White Paper.

ANNEX 1

Reproduced from Spatial Planning Guidance (Wildlife and Countryside Link 2006)

Check list to assess whether regional and local planning documents address the challenges of climate change

Does the RSS/LDF:

- Have robust baseline data on greenhouse gases?
- Choose options directed by analysis of the potential impacts against baseline conditions?
- Contain clear policies to reduce emissions in line with reduction targets?
- Include policies for action to ensure the natural environment can adapt to climate change?
- Include a regional carbon reduction target?
- Promote low or zero emission development principles throughout?

ANNEX 2

Reproduced from Planning Policy Statement 26 – Tackling Climate Change through Planning: the Government’s Objectives (TCPA and Friends of the Earth, 2006).

Anthropogenic climate change threatens species and ecosystem functions and processes upon which human survival and well-being depend. Isolated sites are unlikely to accommodate all of the UK’s characteristic biodiversity or to sustain it in the light of climate change. Resilient systems absorb and respond to changes while sustaining biodiversity and ecosystem goods and services. There is an urgent need to develop and implement strategies that ensure the widest biodiversity can survive and evolve. Planning should seek to maintain and restore ecologically functional landscapes and seascapes, which enable species to adapt and move freely in response to climate change. It should take account of UK Biodiversity Action Plan (UK BAP) targets for species and semi-natural habitats.

Plans and planning decisions should:

1. Protect all semi-natural habitats, including designated sites, not just a representative sample of sites.
2. Take account of the need for all semi-natural habitats planted with non-native conifers to be restored, where any significant relict features survive.
3. Ensure that development is not approved on land where habitat creation could be undertaken to put biodiversity on a more sustainable footing. This is of greatest importance where it would extend existing ancient or semi-natural habitats.
4. Increase the resilience of semi-natural habitats by allocating space for habitat creation, to buffer them from negative edge effects caused by development and other intensive land uses.
5. Increase the ability of biodiversity to move across landscapes by making the intervening land use (such as built development, agriculture or forestry) between semi-natural habitats more biodiversity-rich rather than simply physically linking them.
6. Integrate the needs of landscape scale action for biodiversity with those of development at every scale to deliver wider benefits, for example, in relation to soil conservation, cooling, air and water quality, flood alleviation, high quality food, health, employment and recreation.