

CONSULTATION ON A NEW PLANNING POLICY STATEMENT 4: PLANNING FOR SUSTAINABLE ECONOMIC DEVELOPMENT

WILDLIFE AND COUNTRYSIDE LINK RESPONSE

Wildlife and Countryside Link (Link) brings together 40 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 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 of Link's members will be responding individually to this consultation. Our joint response therefore focuses on key issues of collective concern. It is supported by the following 13 member organisations:

- 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
- Herpetological Conservation Trust
- Open Spaces Society
- Plantlife International
- Ramblers' Association
- Royal Society for the Protection of Birds (RSPB)
- The Wildlife Trusts

1. Introduction

Link has been closely involved in the debate on the future of the planning system, including the reforms which led to the *Planning and Compulsory Purchase Act 2004*, the *Barker Review of Land Use Planning*, and the Planning Bill. We submitted comments on the Barker Review and the White Paper *Planning for a Sustainable Future* and have been engaged in discussions with officials and Ministers on many aspects of the Planning Bill and the proposals set out in the *Review of sub-national economic development and regeneration*.

Link welcomes the opportunity to comment on this important consultation. The planning system through its pursuit of sustainable development promotes environmental and social objectives alongside, and integrated with, economic objectives. A high quality environment is a fundamental ingredient of a successful modern economy. It contributes directly to local and regional economies, supporting regeneration opportunities, and playing a vital role in improving quality of life.

At a time of great uncertainty and with predictions of environmental change as a result of climate change, it is vital that national planning policies place greater emphasis on sustainable land use patterns and development that can accommodate threatened biodiversity and ecosystems, and which conserve and enhance landscape. Many of the UK's Biodiversity Action Plan (BAP) priority species have

declined in range and population size as a result of insensitive development and inappropriate land use. For some, climate change will be the final straw, unless we can incorporate landscape-scale habitat creation into new economic development.

2. Summary of key concerns

Link welcomes references to the need for PPS4 to be read alongside other national planning policy statements, in particular the specific reference to PPS1 *Delivering Sustainable Development* and its Annex on climate change. Whilst much of the content of the new PPS4 is well worded, there is concern that the overarching theme of the statement is that the economy and sustainable economic development overrides all other forms of sustainable development. This would run contrary to existing national planning policy – such as PPS9 – and the statutory duty in the NERC Act for public bodies to have regard to the conservation of biodiversity.

As outlined in Link's Spatial Planning Guidance, "the sustainable development concept should engender a careful reconsideration of traditional notions of planning decision-making and in particular the need to *integrate* rather than *trade off* the objectives of economic development, environmental protection and social justice"¹. This new planning policy fails to adequately reflect the economic value of environmental goods and services, and presents an artificial division between environmental and social concerns and economic development.

The document does not recognise the importance that nature reserves, protected landscapes, and other areas of green space have in generating economic value. These areas, and the conservation activities which support them, can help bring revenue in to local and regional economies, particularly in rural communities with low employment and in urban areas suffering from high levels of deprivation.

Whilst we welcome the references to the importance of green space and a healthy environment in new development, this concept requires significant strengthening throughout the document. There are economic, environmental, and social benefits of including green space. Providing wildlife-rich, green infrastructure through commercial and housing development can improve the quality of the natural environment, which can in turn make an area more attractive to potential investors and end-users. Moreover, green space increases the wellbeing of a population and can have financial benefits through reducing stress, increasing exercise rates and hastening healing².

3. Specific comments on the new PPS4

Paragraph 6 (iv) – We welcome the recognition that the Government's policy outcomes for economic development contribute towards delivering sustainable development, in particular responding to climate change.

Paragraph 10 – A flexible approach to the supply and use of land must recognise the importance of protected species and landscapes and healthy ecosystems.

¹ *Spatial Planning Guidance*, Wildlife and Countryside Link, Sep 2006 – p3

² Bird, W. (2004) *Natural Fit – can greenspace and biodiversity increase levels of physical activity?*

Bird, W. (2007) *Natural Thinking – investigating the links between the natural environment, biodiversity and mental health.*

Landscape-scale planning which respects environmental limits, based on a "plan, monitor and manage" approach rather than "predict and provide", will be crucial in delivering the Government's commitment to halting biodiversity loss by 2010 and future-proofing the UK's wildlife and countryside to the effects of climate change.

Paragraph 11 – We welcome the recognition of the importance of climate change. However, we suggest that it could be considerably strengthened. Economic development should help contribute to the reduction of greenhouse gas emissions in line with the Climate Change Bill, and help address the impacts of climate change on people, landscapes and wildlife.

Paragraph 12 – The promotion of economic growth by regional planning bodies and local planning authorities infers that economic development could be promoted at the expense of environmental or social considerations. Link suggests that positive planning should be for sustainable development rather than solely for economic growth.

We welcome the reference to avoiding adverse impacts on the environment. However, the difference between the compensation and mitigation is not recognised in the draft text. Link suggests that action to avert or remedy adverse impacts on the environment should be carried out in line with the sequential approach advocated elsewhere in government policy such as in PPS9. In other words, where harm to the natural and historic environment has been identified, alternative sites for development should firstly be fully considered. Where alternatives are not feasible and damage is unavoidable, adequate mitigation measures should be put in place. In those cases where mitigation is not sufficient, appropriate compensation measures must be sought.

The promotion of sustainable travel choices should be a requirement of *all* new economic development and not simply 'wherever possible'.

Paragraph 13 – There is no recognition here of the importance of the environment to economic development. Link would like to suggest the addition of "green infrastructure" to the list, a term which encompasses the network of high quality green spaces and other environmental features.

National Planning Policies – We welcome the high level policy reference to encouraging economic development in line with the principles of sustainable development. We also welcome the emphasis on the needs of related businesses to co-locate their industries, thus contributing to the reduction of their ecological footprint.

Paragraph 18 – To ensure that a strategy takes into account the nature of the regional or local character, it should also provide for the *protection* and *enhancement* of a high quality *natural* environment.

The review of employment land should have regard to existing Regional Spatial Strategies and Local Development Framework policies, and should recognise the value of outdoor recreation, the historic environment, biodiversity, and open space. Link also recommends the use of regional habitat opportunity maps in order to incorporate spatial recognition of ecosystem services into the review process.

Paragraph 19 – Notwithstanding the fact that the inclusion of this paragraph pre-empted the outcome of the forthcoming sub-national review consultation, Link remains unconvinced that an economic duty for upper tier authorities is required. We believe such a duty would be against the principles of sustainable development and would override both the sustainable development duty that was placed on local planning authorities in section 39 of the Planning and Compulsory Purchase Act 2004, and the biodiversity duty contained in the NERC Act 2006. Respecting the limits of the environment, natural resources and biodiversity is fundamental to achieving a sustainable economy and will not be achieved by placing an economic development duty on local authorities.

Efficient and effective use of land – We generally welcome this section of the PPS and the emphasis on making the most of existing land including vacant buildings and previously developed land, particularly where this contributes positively to regeneration and to neglected historic landscapes. However, Link is concerned that the prioritisation of previously developed land for economic development may fail to recognise the biodiversity value of many brownfield sites and could lead to the loss of UK BAP priority species and habitats.

Link suggests that this PPS should be made consistent with the new National Brownfield Strategy, which recognises that the ‘the reuse of brownfield land in the widest sense includes green end uses’³. Also, in line with the definition of brownfield sites in PPS3, previously developed land that has reverted to its natural state should be treated as greenfield.

Furthermore, recognition that not all brownfield land is suitable for development and a presumption against developing sites that are valuable for wildlife or recreation, will help safeguard areas of the new UK BAP priority habitat - ‘Open Mosaic Habitats on Previously Developed Land’.

Paragraph 25 - Link does not agree that local authorities should take into account price differentials between land allocated to different use classes. This is an unsound approach as the market does not sufficiently recognise the economic value of the environment. As a result, land safeguarded for environmental protection purposes may not be recognised for its value when such price differentials are considered. For example, a greenfield site is not a blank slate without any environmental economic value as it provides ecosystem services, which have significant economic value.

Securing a high quality and sustainable environment – Whilst this section is welcome, there is currently not enough emphasis placed on the importance of the natural environment and the benefits that this can have on improving the economy. To ensure that important wildlife sites are protected and enhanced through the planning system, a robust assessment procedure i.e. SEA, should be carried out *before* allocating or developing all sites, greenfield or brownfield, for economic development.

We welcome that this PPS encourages good design. The PPS should also refer to the need for design to be sympathetic to our natural heritage, protecting existing habitats where possible and creating new ones where opportunities arise. An attractive and green development brings benefits to business by improving the

³ *Securing the Future Supply of Brownfield Land: Government Response to English Partnerships’ Recommendations on the National Brownfield Strategy*, CLG, March 2008

productivity and morale of its workers and attracts workers, residents and customers to the site.

Paragraph 26 - The working environment is mentioned but specific emphasis should be made to protecting and enhancing the natural environment, for example through reference to low carbon, environmentally sustainable design. Link also suggests that a further reference to the importance of habitat creation is included to ensure that new economic development is tasked with providing for this as it comes forward.

Paragraph 27 - Link believes that specific mention should be made to the provision of the natural environment, specifically biodiversity. Provision of landscaping and open space is welcome, however, there needs to be greater emphasis on the quality and ecological function of the greenspace provided. This quality assurance should pay regard to the importance of ecological services and their associated multi-functional economic benefits i.e. adaptation to climate change, flood alleviation etc.

Development control – a positive approach – Link is concerned that there is too great an emphasis on a presumption in favour of development, which is contrary to the high level policies set out at the beginning of the PPS.

Paragraph 29 - Link is concerned that there is an over emphasis on weighing up the respective merits of economic development against social and environmental costs. This approach does not take into account how the environment benefits the economy. Furthermore, economic benefits are often short term whilst the cost on the environment of economic decisions is often long term and detrimental.

Link recommends that the emphasis and presumption in favour of economic development should be removed and replaced with greater emphasis on the plan led system being used to make integrated decisions.