

Consultation paper on a new planning policy on development and coastal change

Response by Wildlife and Countryside Link October 2009

Wildlife and Countryside Link (Link) brings together voluntary organisations in the UK concerned with the conservation, enjoyment and protection of wildlife, countryside and the marine environment. Our members practice and advocate environmentally sensitive land management and food production practices 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 8.3 million people in the UK and manage over 690,000 hectares of land.

Individual Link members are intending to submit detailed responses to the consultation. Our collective response therefore focuses on the key issues raised by the consultation and is supported by the following 9 member organisations:

- Butterfly Conservation
- Buglife – The Invertebrate Conservation Trust
- Council for British Archaeology
- Campaign for National Parks
- Campaign to Protect Rural England
- Marine Conservation Society
- Open Spaces Society
- Royal Society for the Protection of Birds
- The Ramblers

Introduction

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.

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.

Link promotes a democratic and transparent planning system which considers environmental limits and provides a key mechanism to deliver sustainable development whilst enabling adaptation to climate change. We have confined our response to the questions surrounding the proposed planning policy approach to development and coastal change (Questions 1 to 4 of the consultation paper).

Substantive comments

One of the greatest successes of the planning system in England in the past 60 years has been the protection of large areas of the coastline from unnecessary and/or sprawling development.

The consultation states that the proposed policy on development and coastal change is intended to replace the existing Planning Policy Guidance note 20 (PPG20): *Coastal Planning*. Link is particularly concerned about the loss of important policies in PPG20 that this implies, particularly those policies on conservation and development contained within paragraphs 2.3 to 2.12.

Link calls on the Government to retain a clear distinction between the developed and undeveloped coast; to steer new development towards the developed coast; and to continue to emphasise that few developments require a coastal location. This could either be done through additional wording in the final policy statement on development and coastal change; incorporation into the revised Planning Policy Statement 7 which we understand CLG is currently drafting; or (our preferred solution) through a joint policy statement on coastal change issued by CLG and DEFRA.

Link supports the strategic, risk-based approach to managing future physical changes to the coastline that is embodied in the existing Shoreline Management Plan (SMP) process. The policy statement should ensure that planning authorities adhere to SMPs, especially where they include Natura 2000 sites and have undergone appropriate assessment. To aid strategic decision-making, Coastal Change Management areas should be zoned to reflect different levels of erosion and flood risk.

Nonetheless, we believe that the Government's proposed approach in this consultation is unduly narrow for a national planning policy, focused on the long-term adaptation of a small number of communities that might be affected by decisions to retreat from current coastal defence lines in the future. This narrow focus appears to have led the Government to neglect the value of protecting undeveloped coastline, and the role of planning policy in achieving this.

**Wildlife and Countryside Link
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