

**CONSULTATION ON 'DRAFT PLANNING POLICY STATEMENT: ECO-TOWNS'
WILDLIFE AND COUNTRYSIDE LINK RESPONSE
APRIL 2009**

Wildlife and Countryside Link (Link) brings together 38 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 690,000 hectares of land.

Link welcomes the opportunity to comment on this important consultation. Our vision for eco-towns is for sympathetically-located exemplar developments which apply the highest landscape and environmental standards and combine the adequate provision of well designed, appropriately timed and sufficiently funded green infrastructure, with the protection, restoration and maintenance of all existing designated and undesignated wildlife sites.

Many of Link's members will be responding individually to this consultation. Our joint response therefore focuses on key issues of collective concern and is supported by the following 15 member organisations:

- Bat Conservation Trust
- Buglife – The Invertebrate Trust
- Butterfly Conservation
- Campaign to Protect Rural England
- Council for British Archaeology
- Friends of the Earth
- The Grasslands Trust
- Herpetological Conservation Trust
- Open Spaces Society
- Plantlife
- The Ramblers
- Royal Society for the Protection of Birds
- The Wildlife Trusts
- Woodland Trust
- WWF-UK

1.0 Summary of key points

- A number of the standards are not sufficiently aspirational; particularly those on carbon reduction, green infrastructure, biodiversity, flooding and transport.
- The biodiversity standard must seek a 'net gain' in species and habitats rather than the 'no net loss' approach currently proposed. This tends to imply that damage will occur regardless of any measures taken.
- Green Infrastructure should be masterplanned in advance and be adaptable to future climates.
- The PPS should not name actual sites in the PPS or appendix to it. If it chooses to do so, Government must clarify the status of sites identified on the final shortlist.
- Requirements under the SEA Directive must be satisfied.

2.0 Background

Much has been achieved in terms of the stretching standards and guidance (as set out in the TCPA Eco-towns worksheets) that have been set for Eco-towns. However, since they will only account for a small proportion of homes built, it is vital that they provide lessons that inform development that takes place elsewhere. Government must therefore ensure that the lessons are transferred to all development.

We question whether there is a need for an eco-towns PPS in the form proposed. Many of the standards in the PPS lack aspiration compared with existing policy. Moreover, the PPS rules out other forms of development which would be more sustainable in terms of effects on wildlife, biodiversity, the countryside and landscape. If eco-towns are to be truly exemplar developments, they must go beyond standards already in place and generate lessons which apply to a wide range of circumstances.

2. The Consultation Questions

Q1. Does the draft Planning Policy Statement provide sufficient guidance on the consideration of Eco-towns through the plan making process?

Link is concerned that by naming actual locations, the PPS is prejudging the development plan-process and by-passing established planning procedures.

The fact that an eco-town has been identified on the shortlist should not give it material weight and the reference to this should be removed. There must be no presumption that a short listed eco-town should obtain special dispensation in terms of the normal planning process.

Even if the final PPS does not name locations, there remains the possibility that by stipulating that eco-towns must be freestanding new settlements, the PPS may create a bias in favour of new towns over more sustainable options.

Q2. Are the locational principles for Eco-towns sufficiently clear and workable?

A further principle should be added to the list in 3.2 as follows:

e) proximity to sites designated for nationally or internationally important wildlife or habitats

This provides the expectation that sites which are near to important wildlife sites should not be considered as eco-town locations or, where they are, that the most stringent conditions and assessments will be required to ensure that no damage occurs.

Q3. Taking the overall standards set out in the draft PPS do you think that they achieve a viable Eco-towns concept?

Some of the standards are excellent while some are insufficiently challenging.. More stringent Building Regulations standards will be in force by the time any eco-towns are likely to be built and operating. This begs the question of how they will serve as exemplars if they fall short of the standards of the time.

2.1 Eco-town Standards

Q4.1. Do you consider the standards provide a clear basis on which to make decisions on planning applications for Eco-towns?

We welcome the standards and emphasise our comments that they must be rolled out to other developments so that mainstream housing development learns lessons. The point in 4.1 that eco-towns will need to demonstrate the highest levels of sustainable development and should act as an exemplar for future development is welcome.

The standards suggest brownfield land will feature strongly, yet some locations include a high proportion of greenfield land.

Q4.2. Do you consider that the cost of implementing the standards will undermine the viability of Eco-towns?

This depends how viability is calculated. It is important that a lifecycle or whole life cost approach is taken and the benefits of this communicated to investors, landlords and residents. Higher standards should lead to lower running costs. Therefore over the long term the additional expense should be recouped. Viability by conventional standards may be reduced, especially under present conditions. New models of finance and delivery should be developed which better reflect long term benefits and savings.

We welcome the commitment to 30-50% affordable housing.

Q4.3. Are there any standards that you feel are missing? (That are not covered in other Government policy or guidance)

In the previous rounds of consultation, particularly 'Eco-towns: Living a greener future', there was a strong emphasis on the importance of schools and health services. We are disappointed therefore, that this has been reduced in the PPS.

Consideration should also be given to the potential for landscape restoration and habitat creation. Eco-towns should demonstrate ways that new development can 'add value' to the landscape, rather than take it away. This is possible where it entails restoration of contaminated land for the benefit of communities and wildlife.

Q4.4. Are any of the standards not essential

No comments

2.2 Zero Carbon

Q4.5. The zero carbon standard attempts to ensure that carbon emissions related to the built environment in Eco-towns are zero or below. Have we specified the calculation of net emissions clearly in a way that avoids perverse incentives and loopholes? Is this standard the most cost effective way to do this?

This section of the PPS needs to clarify whether developers are supposed to provide any zero energy 'offset' sources on-site, or at least guarantee its additionality. We can foresee a situation where a developer simply signs up to an existing green electricity tariff and claims that this fulfils their zero energy requirements.

Consideration should be given to transport related emissions to ensure that any increase in these does not override gains made in the built environment. For a settlement to be genuinely carbon neutral, it will need to address these.

2.3 Climate Change and Adaptation

Q4.6. The climate change adaptation standard, alongside existing planning guidance, aims to ensure that Eco-towns will be more future proof. Is it sufficiently clear and workable?

We welcome this section as it sets a clear and workable standard. In particular, the reference to the need for a high quality local environment that meets high standards for both green infrastructure and biodiversity is useful.

2.4 Homes

Q4.7. Should the PPS be more prescriptive than set out in paragraph 4.9(e) in relation to energy efficiency? Do you agree that 70 per cent is an appropriate level of carbon mitigation through on-site means?

Although an eco-town as a whole is expected to be zero carbon, it is perverse that individual homes only need to achieve level 4 of the Code for Sustainable Homes. Homes which are developed before 2016 should lead the way with the highest energy standards, i.e. equivalent to Code Level 6, which implies a 100% reduction in emissions compared to the 2006 Building Regulations. This is not achieved by 4.9(e) and (f).

We believe that a further consideration for all new homes in eco-towns is to dedicate space for home working and private gardens. We welcome the reference to Lifetime Homes and English Partnerships space standards yet do not believe that either provides for peoples ability to work at home. We would also look for alternate and creative ways of working for example the provision of adaptable buildings that can be converted into either homes or offices and the development of community work 'hubs'.

2.5 Employment

Q4.8. Is this employment standard sufficiently clear and workable?

The standard is workable; however as stated above, there must be a reference to the provision of homes that allow people to home work. The PPS should set an indicative target for a percentage of residents to be home workers.

We welcome the commitment to one job per household. However, it should be clarified whether this will be within the settlement and if not, the distance away from it and journey time by public transport, walking and cycling should be specified. Link proposes that this PPS encourages in-town employment opportunities in favour of out-of-town options to reduce the need to travel.

2.6 Transport

Q4.9. The transport standard attempts to support people's desire for mobility whilst enabling low carbon living. Is it sufficiently clear and workable?

We welcome the proposals as a clear and workable step towards genuine emissions reductions from the transport sector in eco-towns. However, a number of the proposals are not sufficiently ambitious. We would like to see Government reverting to, in its own words, the more "challenging and stretching" standards already set in the CLG/TCPA Transport Worksheet of a maximum 40% car use and 25% in the case of transport exemplar eco-towns.

Eco-towns should focus on walking and cycling as the first transport choice for 'in-town journeys' so that it makes more sense for residents to walk or cycle for local journeys, and to use public transport for longer trips making the private car the least favourable option. Achieving genuine 'walkability' in a new town would require a 'walker first' approach to designing *high quality* transport corridors, integrating walking infrastructure with train/tram/or tube travel options, which are far more attractive to commuters than buses.

If these transport corridors do not currently exist they should be created, in tandem with walkable green infrastructure. Other measures include ensuring every house is within a 5 minute walk of a bus stop or other transport node; pedestrian-friendly speed limits of 20mph exist; and housing at sufficient density in order to provide economic viability for local shops and services within a 10 minute walk of everyone in the community.

We welcome the standards set in Section 4.16 on children's walking distances to school and believe they set an acceptable standard for allowing children the ability to walk or cycle to school safely.

2.7 Local services

Q4.10. The local services standard allows flexibility to reflect existing local provision and the size of the development. Does it cover the essential services which will be needed in Eco-towns?

It is important that a range of services is available within the settlement and within walking distance if eco-towns are to serve as an exemplar.

Consideration should be given to the provision of high quality, accessible cultural and civic facilities within walking distance of homes and workplaces. These help to foster community spirit and high levels of participation: both are conditions for stewardship and sustaining commitment towards eco-town ideals in the long term.

2.8 Green Infrastructure and Biodiversity

Q4.11. The standards proposed on green infrastructure and biodiversity aim to ensure that development is undertaken in such a way that it protects and enhances the best features of local landscapes for the benefit of both people and wildlife. Are these standards reasonable and deliverable?

The sections on green infrastructure (GI) and biodiversity set a minimum benchmark and seem reasonable and deliverable. However, we have comments on both sections.

2.9 Green Infrastructure

The 40% target of new greenspace, with 20% of this being public space, is welcome. We are, however, concerned that without more detailed wording on standards and quality of greenspace only a small proportion of the target will be dedicated to new, high quality habitats.

We have concerns that at some sites there may not be adequate mitigation or provision of alternative greenspace necessary to limit effects from disturbance and recreation. Where developments are close to sensitive ecological sites the PPS should allow for the possibility for more semi natural open space, if necessary more than the 40% specified. At the same time, the PPS should make it clear that this

should not be used to justify low density development since low densities increase car dependency and the need to travel since they undermine the viability of local services. The siting and footprint and layout of development and landscaping are important considerations e.g. the use of features such as hedgerows to link habitat, particularly where mature features can be retained can be valuable. Similarly, the PPS should make it clear that the quality and location of the open space are crucial factors in its effectiveness at avoiding harm to sensitive sites.

Critically the PPS does not make it clear that GI should be masterplanned in advance and provided or at least part established before first residents move in, as recommended in the TCPA GI Worksheet. There is a danger that green space and GI will merely be added on as afterthoughts. There is increasing recognition that GI is as important as other forms of hard infrastructure, not just as a visual and physical element but also because of the economic benefits it helps to facilitate. Eco-towns, as exemplar developments, must demonstrate the best possible application of GI principles.

There should be specific mention of GI being fit for future climates. This will be crucial both for playing a role for example in flood protection and for helping biodiversity adapt to the effects of climate change. This point does not come across but will be an important consideration in the master planning of strategic GI.

2.10 Biodiversity

Whilst the section on Biodiversity is reasonably strong, we do not believe that it is currently any better than the existing '*PPS9: Biodiversity and Geological Conservation*'. The PPS is negative in tone and should be seeking positive gains in biodiversity rather than a 'no net loss' approach. It seems to accept there will be impacts rather than avoiding damage to biodiversity from the outset, with no recognition that existing habitats of high biodiversity value should be retained in situ.

There is currently no reference to the fact that biodiversity needs to be considered in terms of its ability to adapt to climate change¹. The implications for biodiversity of different climate change scenarios needs to be addressed in eco-town development proposals and planning applications. The eco-town process presents an opportunity for mitigating climate change impacts on biodiversity through increasing the area of high quality habitat and linking together fragmented patches to create landscape permeability, The opportunity to link climate change adaptation and biodiversity should be highlighted in the PPS.

There is also no mention in the current draft of conserving or enhancing populations of UKBAP priority species and habitats, and the final PPS should also include reference to 'species and habitats of principal importance' through use of the Section 41 list². All habitat restoration/creation and species mitigation should be in line with the actions and targets of the England Biodiversity Strategy framework and regional and local biodiversity partnerships, indeed eco-towns may well be large enough to justify having their own Biodiversity Action Plan

One area where the PPS is weak compared with PPS9 is on addressing locally important nature conservation sites. Their importance as part of the overall network

¹ See England Biodiversity Strategy Climate Change Adaptation Principles
<http://www.defra.gov.uk/wildlife-countryside/pdf/biodiversity/ebs-ccap.pdf>

² Natural Environment and Rural Communities Act (2006)

of sites and the green infrastructure network means they should be recognised. Currently it would be easy for them to be disregarded.

Whilst the reference to seeking advice from Natural England and other statutory bodies is welcome, it should also mention the importance of involving specialist NGOs. Many of Link's members could have an important role in formulating plans and ultimately be responsible for the management of newly created habitats associated with an eco-town.

As with GI, the PPS does not make it clear that biodiversity should be master planned and provided or at least part established before first residents move in. There is a danger that biodiversity provision will merely be added on as an afterthought. Eco-towns, as exemplar developments, must demonstrate the best possible application of both GI and biodiversity principles.

2.11 Water and flood risk management

Q4.12. The water and flood risk standards aim to ensure that Eco-town developments are planned so that they will minimise water use and flood risk, and raise quality. Are the standards proposed clear and deliverable?

We feel that the standards are not strong enough. The PPS is limited to ensuring that eco-towns do not cause increased flooding and endanger people. However, there must be greater aspiration for eco-towns to look to more natural flood protection and water management.

We note that some locations shortlisted for potential eco-towns are areas prone to flooding and therefore meeting the flood risk standards may prove difficult and costly – public funds would be better spent on protecting existing homes from flooding, rather than store up problems for the future by building in flood risk areas.

The essential flood risk management elements of an eco-town should be as follows:

- It should not increase the risk of flooding elsewhere
- It should maximise the opportunities to deliver a range of benefits from flood risk and general water management measures alongside the development such as water quality, public amenity, health, recreation and biodiversity
- Ensuring that from the earliest master planning stages, the development sits within a wider Catchment Flood Management Plan and a local Flood Risk Management Strategy. This should identify opportunities to manage any residual flood risk to the town (after the above measures have been employed) as much as possible e.g. through restoring river and flood plain functioning, multifunction wash lands and sensitive catchment management.

2.12 Waste

Q4.13. The waste standard aims to ensure that Eco-towns manage their waste effectively, from their construction onwards. Is the proposed waste standard a clear and workable way of doing this?

No comments.

2.13 Transition and development

Q4.14. The transition and development standard should ensure that initial residents will not live in unserviced, isolated building sites. Does it get the

balance right between supporting initial residents and enabling developers the flexibility they need to build and grow the town?

The relationship with existing and surrounding communities needs to be addressed. Their commitment will be crucial if the eco-towns concept is to succeed.

Subsection a) should specifically mention that any green infrastructure or habitat creation should also be included in the detailed timetable of delivery. This key area of infrastructure is missing from the list and its importance needs to be recognised.

2.14 Community and Governance

Q4.15. The community and governance standard attempts to ensure that Eco-towns will be successful communities, that residents will have a say in how their town is run, and that standards are maintained. Is the standard clear and workable?

There is no mention of a long-term assessment or sustainability appraisal for biodiversity – this is necessary to ensure the implementation and long-term funding support of the eco-town biodiversity strategies.

2.15 Sustainability Appraisal, Habitats Regulations Assessment and Impact Assessment

Q5. Do you have any comments on the accompanying Sustainability Appraisal/Habitats Regulations Assessment or the Impacts Assessment?
Sustainability Appraisal

We are of the opinion that the SA's consideration of 'reasonable alternatives' (an SEA Directive requirement) of both the draft Eco-towns Programme and PPS is, at best, cursory. For example, the only alternatives considered by the draft Eco-towns PPS SA are 'no eco-towns' and 'developing eco-towns'. Whilst we understand that the Eco-towns Prospectus called for new settlements, given the geographic scope of the PPS and its objectives, the SA should have considered sustainable urban extensions as viable and potentially less environmentally damaging alternatives to new towns.

2.16 Habitats Regulations Assessment

We are concerned at the overall complexity and approach of the HRA. The process has highlighted the central division of the PPS, being both a policy document and site list. The conclusion reached by the HRA (at paragraph 4.2.3) that no further Appropriate Assessment (AA) is needed relates only to the policy statements contained within the PPS, and not sites listed in Annex A for which further HRA work will be essential. We consider that for the HRA to be undertaken properly, the PPS must be seen in its entirety. At present, the findings of the HRAs for each site mean it is not possible to conclude that the PPS will not have an adverse effect upon international nature conservation sites.

In addition, we do not consider that the assessment of existing proposals enables a determination that the policies and standards in the PPS provide sufficient direction to avoid adverse effects of proposals upon international designated nature conservation sites. Each eco-town proposal has unique characteristics and protected sites will have unique features and sensitivities. The mitigation needed (should such mitigation prove feasible) for any site is likely to vary in its extent and character, making bespoke solutions a much better approach for its effective delivery.

Even at the strategic level of the present round of HRAs, it is possible to identify sites listed in Annex A that should be removed from the shortlist due to the levels of concern they raise about potential effects on international conservation sites. No sites should be listed in Annex A if serious concerns remain about their impacts.

We do not consider the Natural England Accessible Natural Greenspace Standards (ANGSt) are appropriate for use as a mitigation standard. We welcome the acknowledgement in paragraph 4.3.7 of the SA/HRA that it is not possible to specify the exact quantity of alternative natural greenspace necessary to mitigate an impact. We also welcome the acknowledgement in paragraph 4.3.10 that a higher standard may be necessary. However, mitigation involves more than the quantity of the open space offered, and must consider its quality and location, which together deliver effective mitigation.

Q6. Do you have any comments on the issues identified in the Sustainability Appraisal/Habitats Regulations Assessment of the locations for Eco-towns?

No comments