

Regional Spatial Strategy proposed changes – SWWT initial thoughts

Headline messages

Despite some welcome additions to wording with respect particularly to international nature conservation sites and green infrastructure, overall the proposed changes represent a greater threat to biodiversity than the draft RSS did. This is because the proposals increase housing numbers significantly in combination with weakening the sustainability policies which in the previous draft were exemplary.

Whilst international wildlife sites receive better protection through the changes, the impact on national and local sites and biodiversity habitats and species could be great in some locations as, even where local authorities have the political will to enthusiastically embrace the concepts of green infrastructure and the Nature Map, they may be so pushed on meeting housing targets that there simply will not be the physical space to do this properly.

Main issues

Watering down of sustainability policies SD1 (ecological footprint), SD2 (climate change) and loss of regional-specific targets in Policy G (sustainable construction) and RE5 (on-site renewable energy). This is particularly a concern with increases in housing numbers – there is likely to be pressure to achieve the housing targets so strong sustainability safeguards and the highest construction standards rather than weaker ones are what is needed.

There is an increase in housing numbers in all ‘Housing Market Areas’ (in most cases this is an increase even on the Panel recommendations). Housing numbers increase by 29% from 459550 in the draft, 569450 in the Panel report to 592460 new houses in the region by 2026. Though not necessarily damaging if planned well, this is likely to lead to increased pressure on environmental assets, either directly (particularly Local Sites, BAP habitats and species etc) or indirectly. In combination with weakening of sustainability policies this is a particular concern.

There are more urban extensions suggested than previously. The SA identifies a number of potential conflict areas with biodiversity assets both with urban extensions and more generally:

- West of England – Areas of search A (bat feeding ground at Dundry and SSSI at Ashton Court), B (which includes “notable” (?) biodiversity factors – and 3000 more houses than the Panel recommendation) and D (a number of SNCIs). Much of the coastline is SAC.
- Exeter – development to S or SW could affect the Exe Estuary, to the E could affect East Devon Pebblebeds SAC.
- Torbay – various designations around it, though the proposed changes here are for 5000 fewer houses than the Panel report (though still an increase from 10-15,000)
- Taunton – impact of discharges on the Somerset Levels and Moors – may require nutrient removal at Taunton STW; impact on Hestercombe House SAC if development NE of Taunton; mention in the SA of the river Parrett sluice scheme, which Somerset WT oppose – so would disagree with the SA recommendation to support this

- Bournemouth & Poole – potential impact on Dorset Heaths sites and River Avon. Mitigation measures in HMA7 need close monitoring and review
- Plymouth – many environmental designations around, though this is recognised in supporting text
- West Cornwall – SACs and SSSIs throughout the HMA
- ‘Polycentric Devon and Cornwall’ [North Devon, Torrridge & North Cornwall] – potential impact on Taw Torrridge Estuary SSSI, Bradiford Valley SSSI and Braunton Burrows SAC.
- Salisbury – River Avon SAC
- Dorchester – water quality of River Frome SSSI and Weymouth – various SSSIs and N2K sites
- Yeovil – water quality on Somerset Levels and Moors

Of these I have the impression from the SA and HRA that it is the West of England where proposed extensions may impact most directly on wildlife sites. But certainly I am aware of local issues in the Bournemouth & Poole area which are not picked up in these 2 reports **so would appreciate advice on all the areas.**

Potential conflicts with habitats regulations, especially:

- Recreation – the HRA concludes safeguards are in place, but only if these work and this is unproven – monitoring and review mechanisms needed
- Water supply – there are remaining concerns, especially as EA were assuming development policy G would remain as it is (so requiring design which met targets for water consumption per person). HRA concludes definite concerns over River Avon, possible issues on a number of other sites – need NE and EA’s views on this
- Water quality
- Air quality (especially transport emissions where roads and airports are close to sites)

I would worry that the plan might be building in major future conflicts which require major investment if they are to be resolved and leaving this uncertainty for LDFs to deal with at a later date.

Deletion of the Second Strategic Route (A303/A358) is to be welcomed. There are some public transport infrastructure requirements which have also been deleted and the SA points out this is unfortunate as these types of project are most difficult to secure investment for. The whole infrastructure issue is batted off (see cover letter from Baroness Andrews) to discussions between GOSW, SWRA, SWRDA and ‘key stakeholders’ as to how this is taken forward – possibly a regional infrastructure board or forum of LAs, agencies, service providers and developers led by SWRA and SWRDA. It is unclear how the public and environmental organisations might engage with this and the worry is once schemes have a regional priority then their principle is not usually up for discussion at the LDF level, just details of route alignment etc.

Things to be welcomed

- The Green Infrastructure policy has been strengthened, including reference to the key aim being the maintenance and improvement of biodiversity (useful as many LAs are still just looking at it from an open space point of view). Also a reference to partnership working between LAs on GI, new supporting text re Habs Regs & recreational activities plus list of sites, requirements to conserve and manage

existing GI and create new GI, and maximising GI role in mitigating and adapting to climate change.

- New reference in RE8 (Woodlands and Forests) to trees and “Ancient or veteran trees should be protected against loss”. [We did also ask for orchards to be mentioned – however orchards are now a BAP priority habitat which should help]
- Wording had been inserted in various places to strengthen the implementation of the Habitats Regulations, and in particular make it clear (in ENV1) that “any development which could have any negative effect on the integrity and conservation objectives of a N2K site would not be in accordance with the development plan”. These insertions are listed at the end of this document

We need to be working with partners from the Regional Environment Network to put out joint messages on the sustainability issues.

Other issues REN may wish to comment on include:

- Changes to RE5 which removes the 10% minimum for on-site renewables and leaves it to LAs to set targets which are “ambitions where feasible and viable”. The SA points out this builds in tensions which “seem almost designed to provoke inconclusive argument and challenge”
- Continued support for airport expansion despite the conflicts with climate change
- Lack of consideration given to any alternative to the economic model based on GVA growth – eg one based on overall quality of life
- Deletion of certain wording which would have helped (eg on ensuring dormitory relationships between SSCTs and nearby towns and villages are not exacerbated)

Other points

- Please note that this plan will replace ‘saved’ policies in Structure Plans (listed in Appendix 4). In Dorset (and I’d imagine elsewhere) this includes the environment policies covering international, national and local sites – which we were relying on to protect Local Wildlife Sites as most of the relevant Local Plan policies have not been saved and we have no LDF policies as yet. Where this is the case, LWS will be reliant on Policies ENV1 (with a reference to surveys being used to enhance local sites but giving priority to national and international sites) and ENV4 (with reference to “taking into account the local distribution of habitats and species and protecting these sites and features from harmful development.”).
- There are no changes to ENV4 or Nature Map
- We ought to ensure the BAP habitat list in Appendix 1 is updated to make reference to the updated UK BAP list (bringing in ponds, orchards etc) – even if no targets can be set for this as yet.

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List of insertions regarding the Habitats Regulations

- Text in 4.0.13 (re habs regs and list of sites particularly vulnerable)
- HMA3 (mention of safeguarding the integrity of environmental and habitat designations wrt Cheltenham SSCT)
- HMA7 (ditto wrt Bournemouth/Poole, also ref to SANGs re SPA & a clause on ecological integrity of international sites)
- HMA11 (mention in 4.1.77&78 of 'important wildlife habitats' and 'habitats issues' wrt Salisbury (but not in policy), also provision for addn water treatment in policy)
- RTS5 (supporting text in 5.1.32 re Habs Regs & list of sites wrt port development)
- RTS6 (supporting text in 5.1.36 re impacts of airports on nearby SPAs + list of sites)
- GI1 (re role of GI in mitigating recreational impacts)
- ENV1 (new supporting text on N2K generally + specific reference to bat foraging habitat for listed sites, also wording in policy saying any development negatively affecting N2K would not be in accordance with the development plan + ref to 3 particularly vulnerable locations, Dorset Heaths, River Avon and Severn Estuary)
- CO2 (new supporting text re impacts of flood defence & coastal squeeze on listed estuarine sites)
- RE4 (insertion of ref in 7.3.9 to avoiding "loss of or harm to biodiversity (eg flight paths of birds and bats)" wrt renewable energy development)
- RE6 (new text re N2K sites wrt water quality and resources + lists of sites)
- RE8 (mention in 7.3.20 of removal of trees to meet conservation objectives for open habitats)
- RE9 (ref wrt air quality in text and policy to habs regs esp transport schemes)
- RE10 (text + list wrt minerals extraction vs N2K sites)