

Consultation on a new Planning Policy Statement: Planning for a Natural and Healthy Environment

A response from the Society of Biology to the Department for Communities and
Local Government

01 June 2010

The Society of Biology is a single unified voice for biology: advising Government and influencing policy; advancing education and professional development; supporting our members, and engaging and encouraging public interest in the life sciences. The Society of Biology is a charity, created by the unification of the Biosciences Federation and the Institute of Biology, and is building on the heritage and reputation of these two organisations to champion the study and development of biology, and provide expert guidance and opinion. The Society represents a diverse membership of over 80,000 - including practising scientists, students and interested non-professionals - as individuals, or through the learned societies and other organisations listed below.

The Society welcomes this consultation and is pleased to respond.

1. Do you support the consolidation and streamlining of policies on the natural environment, green infrastructure, open space, sport, recreation and play into a single planning policy statement?

Yes – this is an imperative and welcome proposal. However the natural environment is not simply those items listed above – the environmental and ecological function of the built components need to be considered as part of the system as a whole. Aligning policies to enhance human health and wellbeing must be a firm goal and is best achieved within an overarching sustainable framework.

2. Does the proposed PPS address sufficiently all the issues that planners and others face in relation to protecting the natural environment, delivering green infrastructure and other forms of open and green spaces, and land and facilities for sport, recreation and play?

No.

There is little mention of protecting ecosystem function and the services they provide (except in the pre-amble) and no indication of how this is to be achieved in practice. Specifically, protection of soil and soil function is not discussed, and the overwhelming impact of development through soil

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sealing, with its consequences for eliminating functions such as biodiversity and carbon sequestration, whilst increasing risk of flooding. This is also relevant to coastal communities & integrated planning.

3. Do you agree with the requirement for local planning authorities to continue to produce, and keep up-to-date, open space strategies which are based on assessments of local need and audits of existing provision (NE1.3)?

Yes – but these need to be carried out in a more credible scientific manner, specifically through the production of maps of environmental assets at a scale (1:25,000 at a minimum) sufficient that the impacts of any proposed developments may be modelled explicitly. Coastal defence & management is a complex issue that needs to be included. In particular we would like to see mention of health within the priority, objective and target categories. This should be informed by knowledge of the regional and sub-regional health sector priorities for the improvement of health and well-being.

4. We propose that local planning authorities should take a strategic approach to the delivery of green infrastructure (NE4), but not to produce and publish a formal strategy (although they can do so if they choose). Do you agree with this proposal?

No – without specific plans based on robust and credible evidence it will be difficult to prioritise activities and to assess success or failure of the process. Ecosystem service assessment should be a key policy driver.¹

5. Do you agree that the proposed policy NE4 will deliver the Government's objectives without imposing any significant new burdens?

No. There is no mention of GIS based planning. Without this it will be difficult, other than at a very crude aggregated level, to assess how the policies are operating. The Marine Environment Data Information Network (MEDIN) is supported by Government (e.g. Defra) and should be included in future discussions about coastal communities.

6. The amended wording of planning policy relating to the floodlighting of sports and recreational facilities (NE11) makes it clear to local planning authorities that they should balance the impacts on amenity and biodiversity against the wider benefits to the community in terms of health and wellbeing and the additional provision of facilities. Do you agree with this proposal?

Yes.

¹ Valuing our life support systems (2009) *Natural Capital Initiative* Available at http://www.naturalcapitalinitiative.org.uk/files/nci_summary_lo.pdf

7. Do you agree that the proposed policy NE11 will deliver the Government's objectives without imposing any significant new burdens?

Yes, as far as we are aware.

8. Do you agree with the conclusions of the consultation stage impact assessment?

Yes

9. Do you think that the policies in this proposed PPS will have different impacts, either positive or negative, on people because of their gender, race or disability? If so, how in your view should we respond? We particularly welcome the views of organisations and individuals with specific expertise in equality and diversity matters.

We do not foresee any negative impacts.

10. Do you have any additional comments to make on this proposed PPS?

This PPS is advancing towards what is required as a next step in maximising sustainable human well-being through protection and enhancement of ecosystem goods and services by wise use of natural capital, but lacks a clear framework for resolving the tensions between these aspirations and those of economic growth based on classical economic models. We suggest that a spatially explicit approach could be helpful in doing this effectively; a GIS based asset inventory (which would require more detailed data collection relevant to ecosystem functioning) from which models may be derived. This should allow examination of the impacts of planning decisions, at varying scales, from local through regional to national and beyond to facilitate strategic oversight. There has already been considerable research at national level in the underpinning natural and social sciences. Significant contributions have, and are being made by the RELU² programme, the Foresight Land Use Futures Programme³, and currently the National Ecosystem Assessment⁴ (ongoing). The conclusions of these studies should be used to optimise this review.

The Society of Biology is pleased for this response to be publicly available and will shortly place a version on www.societyofbiology.org. For any queries, please contact Dr Laura Bellingan, Society of Biology, 9 Red Lion Court, London, EC4A 3EF. Email: policy@societyofbiology.org

² Rural Economy and Land Use Programme (RELU) <http://www.relu.ac.uk/>

³ Foresight Land Use Futures <http://www.foresight.gov.uk/OurWork/ActiveProjects/LandUse/LandUse.asp>

⁴ National Ecosystem Assessment <http://uknea.unep-wcmc.org/>

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