



CIWEM

The Chartered Institution of Water
and Environmental Management

9th December 2004

Sangeeta Sofat
Office of the Deputy Prime Minister
Planning Policies Division (A)
Zone 4/J6
Eland House
Bressenden Place
London
SW1E 5DU

Dear Ms Sofat,

Consultation on PPS9: Biodiversity and Geological Conservation

The Chartered Institution of Water and Environmental Management (CIWEM) is the leading professional and qualifying body for those who are responsible for the stewardship of environmental assets. The Institution provides independent comment, within a multi-disciplinary framework, on the wide range of issues related to water and environmental management and sustainable development.

CIWEM welcomes the production of Draft Planning Policy Statement 9 and the recognition and emphasis of the important role the planning system should play in helping to protect and enhance biodiversity and geology in England. Overall we consider that the statement makes a clear effort to better instigate the protection of biodiversity and geological features which are not already designated sites, and this is to be endorsed.

We are pleased that there are many references in PPS9 to plans, planning and Local Planning Authorities (LPAs) enhancing and adding to biodiversity and geological conservation interests. This is important if the UK is to deliver its targets in relation to habitats and species.

In general, the 'Key Principles' are welcomed. In particular, principles (ii),(iv) and (v) are positive and (vi), relating to mitigation and compensation, is the first statement that we are aware of which considers the issue of compensation in terms of biodiversity in general and not just designated sites. This is a positive step which CIWEM endorses.

We note the requirement that regional spatial strategies should take account of climate change and its impact upon the distribution of habitats and species over time. This is to be welcomed, however, we would suggest that there should be reference somewhere, either in the PPS or in the Circular, to the good guidance in relation to biodiversity and planning contained in 'The Planning Response to Climate Change – Advice on Better Practice'.

We would suggest that there would be benefit in emphasising the way in which Biodiversity Action Plans (BAPs) should be considered in the planning process. Whilst these are mentioned in the Draft Circular, the use of the term 'biodiversity objectives' in the PPS does

not give any indication of where such objectives originate. If the planning process is to play a significant role in helping to deliver biodiversity objectives, it is important that planners are fully aware of where biodiversity objectives originate and BAPs are of key importance in setting them.

CIWEM is pleased that the PPS looks to afford “a high degree of protection under the planning system” to those Sites of Special Scientific Interest (SSSIs) which remain at risk of damage. This amounts to just under half of all SSSIs in England and therefore constitutes a large and important resource which remain at risk of damage. Similarly we are pleased to see specific mention of ancient woodlands and the requirement for LPAs to identify areas of ancient woodland, including those which are not designated, and afford them protection against development.

There is a statement to the effect that specific policies relating to international sites should not be included in development plans, as they are already on a statutory footing. Whilst this makes sense, we consider that it is important to ensure that this advice does not lead to the development of policies which could conflict with those set for an international site. Whilst they may not necessarily be included directly in a development plan, policies relating to an international site should be thoroughly considered and cross-checked with development plan policies.

We are concerned that there is no mention of the important role that the planning system will play in helping to deliver objectives under the Water Framework Directive. We suggest that there should be a specific requirement to protect, maintain and enhance coastal and fluvial habitats in this context.

Finally, CIWEM is pleased that the importance of linking sites of biodiversity importance and assisting movement of species through the provision of routes or stepping stones, and the specific requirement for LPAs to seek to reduce fragmentation and isolation of habitats is welcomed.

Overall, CIWEM considers that this is a positive document and we hope that planners will take forward the spirit of the policy in order to deliver the wider protection and enhancement of wildlife and geology throughout the country and not simply sites already protected.

We hope that our comments are of use to you. Should you wish us to expand upon or clarify any points we have raised, please do not hesitate to contact us.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Nick Reeves', with a stylized flourish extending to the right.

Nick Reeves
Executive Director