

CONSULTATION ON 'ECO-TOWNS: LIVING A GREENER FUTURE'

WILDLIFE AND COUNTRYSIDE LINK RESPONSE

JUNE 2008

Wildlife and Countryside Link (Link) brings together 40 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 476,000 hectares of land.

Link welcomes the opportunity to comment on this important consultation. Our vision for eco-towns is for well-located exemplar developments which apply the highest 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 16 member organisations:

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

1.0 Summary of key points

- Eco-towns must be properly planned through the regional and local planning process including extensive consultation and evidence gathering
- They will need to foster a strong sense of place and community in order to be successful
- Eco-towns must give due regard to the issue of environmental capacity and seek ways in which to reduce their impact in those areas where environmental capacity is already diminished

- They must make every effort to conserve natural resources and raise the bar for future housing development
- Green infrastructure must be provided to a high standard and be of sufficient quality including that which provides ecological function
- Eco-towns must as an absolute minimum protect existing wildlife and make every effort to enhance it for the future

2.0 Background

Link welcomes the aspirations of the eco-towns initiative which aims to contribute to meeting the nation's needs for new housing whilst meeting the requirements of sustainable development. Housing has a considerable environmental footprint - it is the single biggest cause of countryside loss to development and generates demand for other development pressures.

Since the 1990s over 300 square miles of countryside have been affected by urban development each year. Housing also consumes other critical natural resources in the form of construction materials, energy and water. It is vital that as we respond to the need for new housing we dramatically reduce its environmental impact.

We welcome the commitment to make all new homes zero carbon by 2016, all public sector buildings (including hospitals, schools and townhalls) carbon neutral by 2018, and all new offices, shops and other commercial buildings zero carbon by 2019. Whilst we encourage the focus on the environmental implications of new housing, it should be remembered that eco-towns represent less than 5% of the 3 million new homes Government is seeking to build by 2020.

The best climate science shows that to keep the impacts of climate change within manageable levels, we need to achieve an 80% reduction in carbon emissions (on 1990 levels) by 2050. Urgent consideration should therefore be given to improving the environmental performance of all development, be it new or existing. Since 70% of existing homes will still be with us in 2050, the gains to be achieved from improving the environmental performance of existing housing is arguably of greater importance than that of new build.

The environmental performance of individual developments will depend on where they are located, what form they take, and how they are developed, managed and maintained. We welcome schemes that will genuinely secure a step-change in environmental standards and serve as transferable exemplars of environmentally sustainable development. For eco-towns to succeed, they must be well integrated with existing settlements and agreed with, not imposed on, local communities. There is a real opportunity for planners and developers, working with communities, to inspire and set high standards for others to follow, provided the right approach is taken.

Eco-towns have the potential to showcase the role that good quality green infrastructure can play in helping wildlife adapt to the effects of climate change. Well designed and managed green infrastructure can provide ecological connectivity through the creation of a network of interconnected green spaces which will enable wildlife to traverse urban areas, and will help meet the need for mobility and resilience for wildlife habitats in the face of climate change.

3.0 Meeting Planning Requirements

In order to provide inspirational and achievable developments, it is vital that eco-towns are properly planned. Key to this is how decisions on eco-towns relate to existing local and regional plans. Eco-towns should still be subject to extensive public consultation and testing of evidence that provides the basis for securing consent on the level and location of new development.

Some communities felt sidelined by the eco-town debate with the bidding process for developers seemingly circumventing the normal planning processes. The need for a new settlement should be considered in preparing a local plan and the final scheme approved by the local council via a planning application.

The Government must not undermine the planning system. In order to secure public support for an eco-town and to retain public faith in planning, it must spend considerable time, effort and expense to ensure communities have input drawing up local and regional plans. Eco-towns should be subject to the same tests as any other new settlement proposal, as well as adding value by achieving the highest environmental standards.

All schemes should be tested through Regional Spatial Strategies (RSS) and Local Development Framework (LDF) reviews, including adequate Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) where necessary. These will ensure that decisions take full account of evidence on environmental effects and housing need, plus alternatives for meeting these. All decisions on eco-towns should be accompanied by evidence that demonstrates a new settlement to be the most sustainable option for accommodating housing growth compared with other options, such as redeveloping an existing urban brownfield site or an urban extension.

4.0 Community Involvement

The general public and all communities potentially affected should be fully consulted on schemes, including the principle of whether or not to have an eco-town in their area. Eco-towns will need a strong sense of place and community in order to be successful.

Eco-towns should achieve CABE gold Building for Life Standards, with high quality public spaces, architecture and street layouts that give priority to pedestrians and non-motorised transport, including substantial car free areas. They should be complete communities with homes, workplaces, shops, recreation, community and health facilities and open space all within walking distance.

Eco-towns should foster active, sustainable lifestyles and civic participation. Link strongly supports the principles of community involvement in conservation and the multiple benefits derived from community involvement in the management of local public spaces. Benefits include; a sense of ownership, which increases the value of greenspace to the community; reduced vandalism; the physical health aspects of practical conservation work; the mental health and wellbeing aspects of being in natural surroundings; the community cohesion formed when groups of local people work together with a common purpose including the shared responsibility through Community Land Trusts.

5.0 Environmental Capacity

Link is concerned that the majority of new development pay little attention to impacts on environmental limits. Decisions on ecotowns should include a full consideration of the impact on environmental capacity and measures to reduce this. As part of the RSS and the LDF process, the impact of an eco-town should be assessed through the SEA process. Where impacts on environmental limits are too high or cannot be sufficiently mitigated against, such as impacts on designated wildlife sites, legally protected species, or Biodiversity Action Plan (BAP) habitats or species, the proposed scheme should be rejected.

Some areas of the country are considered to be virtually at their environmental limit. Where this is the case, ecotowns should not be considered in these areas unless their impact can be fully mitigated and reduced to virtually zero.

In prioritising previously developed land for eco-town development, care should be taken to ensure that the biodiversity value of many brownfield sites is planned in to the way an eco-town is taken forward so that any potential loss of UK BAP priority species and habitats is avoided.

6.0 Conservation of Natural Resources

Housing has huge implications for the consumption of natural resources. Fossil fuel for energy and transport generates pollution and greenhouse gases, which contribute to climate change. Eco-towns should raise the bar for housing development by showcasing environmental techniques that conserve natural resources. They should include measures designed to conserve water and other natural resources, source food and fuel for energy locally, minimise soil, air, noise and light pollution and achieve zero-waste.

All eco-town housing should be built to Level 6 of the Code for Sustainable Homes. The highest energy efficiency standards available should apply to all community buildings including use of locally generated combined heat and power, for example, micro biomass power plants using locally grown wood.

Water-saving and water efficiency measures should be used on all new housing. This should include measures to trap and store wastewater that can be re-used for other purposes. Sustainable Urban Drainage Schemes (SUDS) should be used as the norm rather than the exception. SUDS help alleviate flooding impacts of urban development and can be a basis for new wildlife habitats and an amenity greenspace for new communities, as well as contributing to an eco-town's green infrastructure network.

Buildings should be constructed from sustainably and locally sourced materials, for example, through use of low carbon materials such as wood obtained through legal and sustainable sources as part of a strategy of product substitution. Where materials have been quarried locally, consideration should be given to restoring minerals sites to biodiversity rich greenspace, which will add to the Green Infrastructure (GI) network of the development.

Eco-towns should be well connected to their surroundings with high quality well funded public transport providing good access to nearby settlements and local supply networks. The provision of sustainable travel choices, with a strong emphasis on and

incentives for the use of walking and cycling, should include extensive improvement of any existing public transport infrastructure and reliable funding streams to maintain quality services.

7.0 Green Infrastructure

Green infrastructure (GI), a term which encompasses the network of green spaces and other environmental features, is as essential to all new development as traditional 'grey' or 'hard' infrastructure such as roads, schools and hospitals. High quality green infrastructure promotes ecological connectivity through the creation of a network of interconnected spaces, enabling wildlife to traverse urban areas and meet the need for mobility and built in resilience for wildlife habitats to adapt to the effects of climate change. If sympathetically designed, eco-towns - with high levels of good quality green infrastructure - may be more appealing to wildlife than land which is intensively farmed.

Eco-towns provide a unique opportunity to develop new approaches to creating and maintaining high quality GI. Link suggests that GI should cover at least 40% of the development area for it to qualify as 'an eco-town'. This should include new informal and formal greenspace along with existing wildlife habitat such as areas encapsulated within developments, nature reserves, country parks, historic sites and landscape features, road verges and roundabouts, linear habitats along watercourses and hedgerows, SUDS and ponds, green roofs and private gardens.

Link further suggests that GI should incorporate wooded and non wooded greenspace and that it should be located throughout eco-towns such that no one lives more than 300m from an area of accessible greenspace of >2ha, and no further than 500m from an area of accessible woodland greenspace of > 2ha. We also would wish to see larger areas (20ha+) of accessible greenspace located within 4km of all residents.¹

It will be essential to link the new eco-towns sensitively with the surrounding countryside, in the case of rural areas, or into existing GI networks within the green belt around existing urban areas, where appropriate.

To plan for GI it is essential to;

- Masterplan and design it from the outset. Even before land prices are agreed between landowners and developers, or building or transport is considered, each eco-town should have a GI Strategy detailing where it will go, when it should be completed, sources of funding and who will carry out long-term maintenance.
- Create networks of sites that 'fill the gaps' between existing greenspaces and sites of importance for biodiversity.
- Make the best use of existing resources and create GI before residents move in. Eco-towns should not be seen as a 'blank canvas' where existing greenspace and biodiversity is stripped away to start afresh.

¹ Based on Natural England's Accessible Natural Greenspace Standard and the Woodland Trust's Woodland Access Standard.

- Plan to shape the development of the built environment in eco-towns. GI should also not be a 'bolt on' that is added at the end of the development process.
- Ensure that it accessible to all and it is seen as a community resource, whilst recognising that access may need to be controlled at ecologically sensitive times of year. Research shows that access to quality greenspace improves physical and mental health².
- Make new communities aware of what GI exists. Using appropriate information, help people make the most of it and feel responsible for it.
- Ensure it is of high quality, not just amenity grassland with lollipop trees. Ecological function should be considered at the planning stage with every aspect of the GI used for an ecological purpose, e.g. habitat creation, flood alleviation.
- Design to integrate the historic landscape character of the area and to respect the distinctiveness of local built heritage
- Be consistent with Planning Policy Statement 17: Planning for Open Space, Sport and Recreation,
- Design it to include features and species which contribute to local Biodiversity Action Plan targets for the area. Key to this is the involvement of relevant stakeholders to provide expert advice on its creation and maintenance.
- Acknowledge that whilst multifunctionality of new greenspaces is important, sites which perform ecological functions in their own right, such as designated sites, should not be undermined by a desire to use them for other purposes, for example, increased recreation.
- Ensure adequate funding is available to create and maintain it in the long term. Section 106 agreements and the forthcoming Community Infrastructure Levy could be potential sources of funding. Link suggests that 20% of all funding for eco-towns should be allocated for specific GI creation and improvement.

8.0 Protect and Enhance Landscape and Wildlife

Eco-towns should be subject to an independent landscape character appraisal, be sympathetic to their setting and clearly enhance the local landscape, built and natural heritage, including through the designation of new Green Belt, where appropriate. They should also seek not just to protect existing on-site biodiversity but also enhance it for future generations and showcase best practice if they are to genuinely be worthy of the title 'eco-towns'.

In summary, eco-towns should;

- Characterise the local ecology and landscape as part of the master-planning process. This is essential to ensure that any new GI is in keeping with the local landscape and uniqueness of the area.

² Bird, W. for RSPB (2004) *Natural Fit – can greenspace and biodiversity increase levels of physical activity?*

Bird, W. for RSPB (2007) *Natural Thinking – investigating the links between the natural environment, biodiversity and mental health.*

- Be consistent with Planning Policy Statement 9 – Biodiversity and Geological Conservation and its accompanying Good Practice Guide, and the Planning and Climate Change Supplement to PPS 1.
- Be consistent with the National Brownfield Strategy.
- Ensure both the protection of all biodiversity interest currently on site and opportunities for habitat creation in order to build in species resilience to climate change.
- Where new habitats are created, ensure they contribute to locally agreed, spatial habitat targets and wherever possible contribute to national Biodiversity Action Plan (BAP) targets. Every eco-town should have its own BAP based on local priorities against which monitoring can take place and further habitat creation be facilitated.
- Be consistent with the Horticultural Code of Practice to help prevent the spread of invasive non-native species.
- Provide homes for wildlife such as nest boxes, bats bricks, swift and house martin nests. Suitable locations and existing populations of species that might colonise these features should be considered whilst guarding against attracting non-target species of both fauna and flora.
- Seek to ensure that gardens and small communal spaces add to the quality of the GI network through the promotion of wildlife gardening principles³. Gardens, both private and communal, will be a key aspect of eco-town design. Residents and community greenspace guardians should be encouraged and assisted – through information provision, practical advice and support - to manage gardens for wildlife as an integral part of the overall GI network.

Providing homes for wildlife

Some species of wildlife have lost natural opportunities to roost or nest and have become adept at utilising our built environment.

These include barn owls, house martins, swallows, swifts, starlings and bats. All 17 of UK species of bats have been recorded in buildings, which provide essential roost spaces for several species including serotine, greater and lesser horseshoes, Natterer's bats, pipistrelle and long-eared bats.

Unprecedented change in the building industry with new regulations, techniques, materials and build styles will help reduce the carbon footprint of our future housing stock.

However, the need for 'airtight' buildings (to achieve low or zero carbon) will mean that, for the first time, there will be very few, if any, new roosting and nesting opportunities for some building-reliant species.

It is possible to incorporate small design changes that would make new buildings a place where wildlife can still find a home.

Every eco-town should be an exemplar that sets high standards which are translated into other development practice and techniques, leading to dramatic improvements in the entire approach to housing and built development. Eco-towns should not exist in isolation from mainstream approaches to planning, design and construction.

³ For example, RSPB's Homes for Wildlife – see www.rspb.org.uk/hfw