



Make Space for Wildlife

Submission for the proposed Planning White Paper The Royal Society for the Protection of Birds February 2007

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The Royal Society for the Protection of Birds (the RSPB) is the charity that takes action for wild birds and the environment. We are the largest wildlife conservation organisation in Europe with over one million members. We own or manage approximately 135,000 hectares of land for nature conservation on 200 reserves throughout the UK.

We believe that sustainability should be at the heart of decision-making. The RSPB's policy and advocacy work covers a wide range of issues including planning and regional policy, climate change, energy, marine issues, water, trade and agriculture. As well as commenting on national planning policy issues, the RSPB's professional conservation and planning specialists make representations on around 800 items of planning casework each year throughout the UK, including regional planning, development plans and individual planning applications and proposals. We thus have considerable planning experience.

The RSPB considers that human-induced climate change poses the biggest long-term threat to global biodiversity. A review paper in *Nature* indicates that in a sample region covering about 20% of the Earth's land surface "15 to 37% of species in our sample of regions and taxa will be 'committed to extinction' as a result of mid-range climate warming scenarios for 2050."¹

To avoid such a catastrophe, greenhouse gas emissions need to be cut hard and rapidly. We therefore actively lobby for policies and measures which reduce the anthropogenic

¹ Chris D. Thomas et al, Extinction risk from climate change, *Nature*, 8 January 2004.

greenhouse gas emissions that cause climate change. We are members and active contributors to the work of the Climate Action Network (the main umbrella body of NGOs working on climate change globally, through the UNFCCC and other international processes). In the UK, we are also founder members of Stop Climate Chaos, the coalition of UK-based NGOs pressing Government to act to avoid dangerous climate change.

As a wildlife organisation with a suite of nature reserves and with conservation programmes aimed at the protection and recovery of threatened wild birds, we also have an active programme of work on adaptation strategies for biodiversity. We have hosted a number of international conferences on the impacts of climate on wildlife, and have published a range of documents and papers promoting appropriate responses to change. These include a review of the potential role of the Birds and Habitats Directives in helping wildlife adapt to climate change², and a review of the role of habitat connectivity in adaptation.³

Make space for wildlife

Wildlife needs space to adapt to climate change, not just in designated sites but throughout the landscape. Planning has a vital role to play in securing this space. However, the emphasis of the Barker Review on prioritising economic development within the planning system threatens both to increase emissions and risks decreasing rather than increasing the resilience of our landscapes to climate change, as explained further in this paper.

The UK Government is committed through its Biodiversity Action Plan, to the conservation and restoration of a range of threatened habitats and species; through this plan, it is making its contribution to the wider European target, of halting biodiversity loss by 2010.

Climate change impacts on wildlife

Wildlife will face a range of impacts from climate change, which may threaten its survival, if we do not take action to improve its capacity to adapt. These impacts are summarised below.

² Sutherland, Watts and Williams. 'Climate Change and the Birds and Habitats Directives: Can they work together?' ECOS, June 2005.

³ Donald, PF (2005) Climate change and habitat connectivity. Assessing the need for landscape-scale adaptation for birds in the UK. The RSPB, Sandy.

Climate envelope modelling⁴ has shown that the suitable 'climate space' for many plants and animals in the UK is likely to change, as areas of currently suitable climate move broadly northwards and uphill. Evidence from periods of climate change in the past shows that species distributions' tracked suitable climate space in similar ways to those predicted by today's climate models. However, this occurred in landscapes with relatively few barriers to movement. Barriers such as built-up areas, transport and industrial infrastructure, and intensively managed agricultural land all have a substantial presence in our modern environment.

Increases in extreme and unseasonal weather are likely to threaten wildlife through direct mortality from flooding, and loss of food and habitat through floods, droughts and storms.

Species may suffer because of changes in the timings of biological events, which will result in them being unable to access their usual sources of food or habitat. For example, early grass growth may reduce breeding opportunities for ground-nesting birds, whilst changes in invertebrate life-cycles may result in birds hatching young at times when there are reduced or limited food supplies.

Assemblages of species in habitats such as heathlands and grasslands may change, as a result of the new climate conditions favouring some species over others.

Climate change and conservation policy

Nature conservationists are developing an approach to ensuring that wildlife can withstand and adapt to climate change, based on some key principles:

- Designated sites, which are free from development and other pressures, are likely to remain of great importance to wildlife in a changing climate, even if the species they support change over time. We must continue to protect these sites if we are to help wildlife survive climate change.
- Climate change is nevertheless likely to result in some direct habitat loss, particularly of coastal and freshwater wetlands. Already vulnerable wildlife will not be able to withstand the impacts of climate change, unless replacement habitat is provided for them within an appropriate time-scale.
- Some, if not most, species are likely to attempt to track their suitable climate space, as this moves through the landscape. This can be facilitated, by creating a

⁴ eg MONARCH (Modelling Natural Resource Responses to Climate Change), <http://www.ukcip.org.uk/resources/sector/monarch> and ACCELERATES (Assessing **C**limate Change Effects on Land use and Ecosystems) <http://www.geo.ucl.ac.be/accelerates>

‘permeable’ habitat matrix, with features that help support biodiversity widely distributed across the farmed and urban environment. Existing areas of semi-natural habitat outside designated sites have a central role to play in delivering this ‘permeable’ matrix, and should be offered protection through the planning system.

- Larger areas of habitat tend to be more resilient to at least some of the effects of climate change, such as extreme weather events (floods, storms, droughts). There is a good case for increasing the size of existing areas of semi-natural habitat, and joining these up into more contiguous networks, in order to overcome these impacts.
- Taken together, these actions can help to create resilient landscapes for wildlife, which can also deliver much wider benefits for people, in the form of greater leisure opportunities and improved health; sustainable flood risk management; water purification; and climate mitigation through carbon storage in habitats such as intact peatlands.

These principles are supported – up to a point – by planning policy in PPS9 *Biodiversity and Geological Conservation*, the accompanying circular and good practice guide, which place a greater emphasis than before on biodiversity enhancement. However, PPS9 says little explicitly about the types of actions which planning bodies should undertake in order to enable wildlife to adapt to climate change.

The Barker Review and climate change

The final report of the Barker Review of Land Use Planning helpfully notes the conclusion of the Stern Review that ‘policies for nature protection should be sufficiently flexible to allow for species’ movements across the landscape’ (paragraph 2.32 of Barker Review). It would be better to say that policies for all sectors should be sufficiently flexible, as the key issue is ensuring that wildlife adaptation policies are integrated into policies for urban areas, housing, economic development, agriculture, forestry and so on, which is essential for creating the ‘permeable’ habitat matrix referred to above.

A more fundamental concern, however, is the lack of climate change ‘proofing’ of the recommendations in the Barker Review, despite the challenges of climate change and environmental limits being highlighted in the interim report (paragraphs 2.13-2.16).

Some recommendations are clearly intended to promote measures that reduce carbon emissions, either directly (e.g. extending permitted development rights to commercial micro-generation) or indirectly (through streamlining processes for large scale renewable energy). However, the emphasis of the Barker Review on prioritising economic development within the planning system threatens both to increase emissions

and risks decreasing rather than increasing the resilience of our landscapes to climate change. On the latter point it does this by:

- Weakening the protection afforded to semi-natural habitats, habitat features, and populations of vulnerable species, which occur outside designated sites, through recommendations such as the presumption in favour of development.
- Not identifying the need to replace habitat lost as a result of climate change pressures, such as coastal squeeze.
- Failing to identify the potential to enhance landscapes through the creation of new habitat features, or by extending and linking areas of existing semi-natural habitat.
- Failing to recognise the roles which sustainably managed and wildlife friendly landscapes can play in mitigating climate change, and helping human adaptation, through carbon storage, flood management, water treatment, and the provision of leisure, health and livelihoods.

Alternative solutions

Implementing all of the RSPB's recommendations for the Planning White Paper would go a long way to ensuring that it does properly take into account the need for wildlife to adapt to climate change. In summary, our other recommendations are:

Keep the plan-led system. Weakening the policy framework by introducing a presumption in favour of development in certain circumstances would make it more difficult to protect undesignated wildlife habitats. On the other hand, having a strong plan-led system means we can properly integrate social, economic and environmental interests, including the need to provide space for wildlife to adapt to climate change.

Introduce a National Spatial Framework for England. As we discuss in our separate paper, this would facilitate better integration between different sectoral strategies, including between biodiversity and other sectors, and better protection and enhancement of ecosystems and the services they provide. It would also clearly set out the long-term direction of travel which is essential for long-term challenges such as climate change and restoring biodiversity loss.

A fair and credible process for deciding Major Infrastructure Projects. Ensuring that the proposed Planning Commission has proper environmental expertise would help to ensure that decisions take into account the need for wildlife to adapt to climate change.

Robust environmental assessment. Better quality sustainability appraisal and environmental impact assessment are critical to ensuring that plans and projects take into account the need both to reduce carbon emissions and adapt to the impacts of climate change.

By taking a more pro-active approach to planning for nature, planners could help shape future landscapes which are resilient to climate change, rich in wildlife, and offer a wide range of benefits to citizens.

Planning policy on climate change

The draft Planning Policy Statement on Climate Change is welcome, and offers some useful cross-references to biodiversity, which must be taken into account in preparing the Planning White Paper. These include:

- a key planning objective, to *'sustain biodiversity, and in doing so recognise that the distribution of habitats and species will be affected by climate change'*;
- and the recommendation that when identifying land for development, planning authorities should take into account *'the effect of development on biodiversity, and the capacity for adaptation, having regard to likely changes in future climate.'*

However, it is difficult to see how these important aspirations can be delivered, if all of Barker's recommendations are delivered through the Planning White Paper. Achieving a planning system that is well adapted to future climate will require a greater level of integration between the Planning White Paper and the draft climate PPS, and more detailed consideration of the specific needs of wildlife in relation to climate change.

Annex

The provisions of the EU Birds and Habitats Directives require the conservation of biodiversity interest outwith protected areas, and offer important tools to planners who are seeking to promote adaptation to climate change. Relevant articles are:

- Birds Directive Article 2 requires *'requisite measures to maintain the population of the species referred to in article 1 at a level which corresponds in particular to ecological, scientific and cultural requirements, while taking some account of economic and recreational requirements, or to adapt the population of these species to that level.'*
- Birds Directive Article 3(b): *'upkeep and management in accordance with the ecological needs of habitats inside and outside the protected zones'*
- Habitats Directive Article 10: *'Member States shall endeavour, where they consider it necessary, in their land-use planning and development policies and, in particular, with a view to improving the ecological coherence of the Natura 2000 network, to encourage the management of features of the landscape which are of major importance for wild fauna and flora.'*