

If you wish to comment on the Draft Regional Spatial Strategy for the South West, please follow these stages:

1. Complete your details in **Section A** of Page 1 of the representations form.
2. Include your organisation/name/page number in **Section B** on Page 2 and on additional completed pages.
3. Complete a separate Page 2 of the form for each part of the Draft RSS for SW you wish to comment upon.
4. Indicate which chapter/policy/paragraph you would like to comment upon also in **Section B**.
5. Provide a short summary, give reasons for supporting/objecting and set out your changes in **Section C**.
6. Email your completed forms to representations@southwesteip.co.uk by the end of the consultation period.

Additional representations forms are available from the EiP Website at www.southwesteip.co.uk or from the Panel Assistant at the Panel Secretariat Office. For any general enquiries please use the Office address below.

The Panel would prefer all responses to be typed in black and e-mailed to representations@southwesteip.co.uk - it would be helpful if your representations were submitted electronically and only once – unless requested there is no specific need to also send a hard copy response. To ensure your comments are taken into account the Panel would encourage those making representations to return, at the earliest opportunity, the completed forms to the Panel Secretary to arrive at the Panel Secretariat Office by **5.00pm on Wednesday 30 August 2006**.

Please note that all comments will be available for the public to read and therefore they cannot be treated as confidential. A summary of your comments provided on the form will be put on the EiP website in due course.

This consultation is being conducted in accordance with the 'Code of Practice on Written Consultation', issued by the Cabinet Office in November 2000. Any procedural observations or complaints about this consultation should be sent to Martin Bridgman, RSS Advisor, Office of the Deputy Prime Minister, Eland House, Bressenden Place, London SW1P 5DU.

Section A

Comments submitted by	Agent (if appropriate)
Organisation: Avon Biodiversity Partnership Surname Title/first name: Address: C/o Avon Wildlife Trust 32 Jacobs Wells Road Bristol Post Code:BS8 1DR Email: lucyrogers@avonwildlifetrust.org.uk Tel: 0117 9177270 Fax: 0117 9297273	Organisation: Surname Title/first name: Address: Post Code: Email: Tel: Fax:

Panel Secretariat Office South West RSS EiP 2, Rivergate Temple Quay Bristol BS1 6EH	Panel Secretariat Office General e-mail: enquiries@southwesteip.co.uk Telephone enquiries: 0117 900 1814 Responses e-mail: representations@southwesteip.co.uk
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Please do not return the representations forms to the South West Regional Assembly.

Signature: <i>.....Lucy Rogers.....</i>	Date: 30/08/06.....
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Please ensure **Section A** is completed and e-mail all your completed representations forms to the Panel Secretariat's Office by 5.00 pm on Wednesday 30 August 2006 at representations@southwesteip.co.uk

Section B
Your comments by

Organisation Avon Biodiversity Partnership	Name	Page Number C4 P1
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I am supporting or opposing the Draft Regional Spatial Strategy for the South West (please specify) ...Opposing

Chapter (section): 4.2.23 **Page:** 4..... **Policy Reference or Paragraph Number:** 55-61..... SR1-6, 4.2.3-

Section C
Your comments on the Draft Regional Spatial Strategy for the South West

Policy Reference or Paragraph Number:	SR1-6, 4.2.3-4.2.23, West of England Spatial Strategy
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Please use this space to assist the EiP Panel and other respondents by providing a short summary of your comments.

- **We are concerned as to whether it is possible to achieve the level of growth planned for West of England without making much clearer requirements for sustainable development measures. Such requirements include:**
 - A stated requirement for green infrastructure throughout the urban area as well as in urban extension and the need to secure long term management of green infrastructure.
 - Meeting of the top level 5 of the *Code for Sustainable Homes* and carbon neutrality throughout this area given that a large proportion of development is targeted at the existing urban area and could be brought forward as smaller sites.
 - Protection of water resources by minimising water use in all new development and refurbishment.
 - Protection of valuable urban wildlife sites. Many sites on previously developed land ('brownfield' sites), particularly in the Bristol/Bath and Western-super-Mare areas, are important for biodiversity yet many are undesignated. These sites may be threatened by policies to target development within existing urban areas.

Until we see further detail on how it is proposed to avoid this harm, it must be assumed that an appropriate assessment would conclude that the level of proposed development would have an adverse impact on sites protected under the Habitats Directive.

Proposals to expand the road network and encourage growth of Bristol International Airport are in direct conflict with the sustainable development principles detailed in Chapter 1

Please use this space to explain to the EiP Panel why you support/oppose this particular part of the Draft RSS.

There is a limit to the capacity of West of England to absorb more housing and transport links without damaging biodiversity.

We are concerned that biodiversity has not been sufficiently taken into account in the decision making process at the sub-regional level, for example:

- in the location of new housing developments
- areas identified for removal from the green belt are believed to be amongst the most valuable for wildlife.
- Some areas where development is proposed, such as the North Somerset Levels, are included in the SW Nature map as they contain nationally important habitats and species, which have statutory protection, and are the focus of conservation effort.

Specific points include:

- Urban growth could give rise to adverse effects on the Severn Estuary Special Protection Area in a number of ways. Additional housing could increase recreational pressures beyond those which already exist, increased pressure for allocation of renewable energy provision (wind farms) and reduction in suitable habitats for resident and migrating birds species.

Organisation Avon Biodiversity Partnership	Name	Page Number C4 P2
<ul style="list-style-type: none"> ▪ Area of Search E south west of Bath is an internationally important area for the conservation of Greater Horseshoe Bats which require high quality continuous foraging areas. Development in this zone would have an adverse impact on these bat populations and the cSAC. ▪ Area of Search A and B south Bristol include important grassland habitat of the Dundry Slopes. Development and infrastructure pressure could reduce and fragment these important UK BAP priority habitats. ▪ Area of Search F south and east of Western-super-Mare includes floodplain areas of the North Somerset Levels and Moors. Any further development on or next to this floodplain could further constrain water level management within SSSI sites, and give rise to adverse effects. There is no mention of the emerging national policy, PPS25: Development and Flood Risk, so we would recommend that the final version of the RSS make specific mention of the need for flood risk assessments for this area. <p>In order for the proposed housing and transportation to comply with the RSS and PPS9 principles, it is important that a sophisticated approach is taken to enshrine sustainable, high-quality green infrastructure within the design principles.</p> <p>In addition sustainability issues arise with such high levels of proposed growth. With a high proportion of development within existing urban areas, many sites will fall under the threshold of the 'large sites' category. If this allocation is taken forward we would like to see a specific requirement for all buildings to be designed and constructed to meet the top level 5 of the emerging <i>Code for Sustainable Homes</i>. Assumptions about the growth of Bristol airport are based on government figures which use an outdated 'predict and provide' approach which runs counter to sustainability policies.</p> <p>Finally, with the dissolution of the Joint Strategic Planning and Transportation Unit, we are concerned that there is no appropriate body to oversee a strategic approach to development.</p>		
<p>Please use this space to set out any changes to policy/supporting text in this part of the Draft RSS you would like to see.</p> <ul style="list-style-type: none"> • Further work is needed on the green belt review, infrastructure provision and sustainability appraisal to determine if the housing allocation and transportation proposals are feasible and before there can be any definite conclusions on scale and location of urban extensions. • We recommend a strategic sub-regional approach to delivery of the biodiversity objectives of the RSS for this area in line with 7.2.11, making good use of local initiatives. • Green Infrastructure requirements within the urban area and urban extensions should be added to the bullets within paragraphs 4.2.13, 4.2.19 and 4.2.23. • Text should be added to SR2 to specify that to ensure sustainable development at a high growth level, measures including green infrastructure, the highest standards of sustainable construction and resource demand management will be required. • Text of SR2 should be changed from maximising the use of previously developed land and buildings to 'maximising the use of previously developed land and buildings where there is no biodiversity value on the site' • The need to ensure no net loss of biodiversity in any expansion of the port or airport should be included in paragraph 4.2.5. • We do not agree with the assumptions made in the Bristol International Airports Master Plan documents of passenger numbers and infrastructure requirements. Assumptions about the growth of Bristol airport are based on government figures which use an outdated 'predict and provide' approach which runs counter to sustainability policies. • Paragraph 4.2.8. states that land south of the Royal Portbury Docks and the M5 should be excluded from the Green Belt. This should not infer that this land be allocated to development as this area contains priority BAP habitat. • A fifth bullet point should be added to SR3 that any land excluded from the green belt should be assessed for biodiversity value and impact on wildlife and the need to identify and enhance suitable mitigation sites prior to any loss of green belt. 		

Organisation Avon Biodiversity Partnership	Name	Page Number C4 P3
<ul style="list-style-type: none"> • Text in SR4 should be changed from ‘Investment in key infrastructure, to ‘Investment in key infrastructure and green infrastructure, and provision made for the long-term management of all infrastructure, to enable’ • A fourth bullet point should be added to SR4 for the specific requirement for all new and refurbished buildings to be designed and constructed to meet the top level 5 of the emerging <i>Code for Sustainable Homes</i> should be added. • A fifth bullet in SR4 should be added to acknowledge that water supply is placing strain on the natural environment, alter the emphasis to restraint on water use and requiring the highest standards of water conservation in all new and refurbished buildings. • Paragraph 4.2.13 bullet point four is based on figure published in the Bristol International Airports Master Plan documents on projected growth and therefore the need to increase road infrastructure. We do not agree with these figures and also feel that the emphasis should be on increasing sustainable transport links to the airport, therefore there is no need to improve access to the airport nor to use this to justify the South Bristol ring road. • Paragraph 4.2.13 bullet point six should include the principles of natural ‘soft engineered’ coastal defences that are sustainable and also increase coastal floodplain grazing marsh and salt marsh habitats. This approach would increase the provision of habitats for internationally important bird migration sites. • Paragraph 4.2.15 last sentence reads accommodated primarily through the re-use of urban sites this should be changed to insert excluding urban sites of high biodiversity sites using PPS9 Planning for Biodiversity and Geological Conservation – A Guide to Good Practice. • Paragraph 4.2.16 mentions regeneration policies at Norton Radstock this development will have a detrimental impact on biodiversity and is a case in example where urban sites should not be developed. Therefore the end sentence should be deleted. • Text in SR5 should insert ‘only where there is no net loss to biodiversity’, after the sentence ‘previously developed land and buildings within the urban area’. • We disagree with the wording in SR5 that 1500 housing should be allocated to Search Area E due to its importance for populations of Greater Horseshoe Bats which would place this development within a cSAC. • Text in SR6 should be altered that 9,000 house should not be built on the floodplain and that the words ‘and green infrastructure, and provision made for long term management of all infrastructure’ be inserted after ‘Investment will be made in key infrastructure’ 		

Section B

Your comments by

We endorse the comments of the South West Biodiversity Partnership which are:

Organisation South West Regional Biodiversity Partnership	Name	Page Number Dev H page 1
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I am supporting or opposing the Draft Regional Spatial Strategy for the South West (please specify) ...Supporting....

Chapter (section): 3 **Page:** 47 **Policy Reference or Paragraph Number:** Development Policy H

Section C

Your comments on the Draft Regional Spatial Strategy for the South West

Policy Reference or Paragraph Number: Development Policy H Re-using land

Please use this space to assist the EiP Panel and other respondents by providing a short summary of your comments.

- **We support the statement that for previously developed land, “development may not always be the most sustainable land use”, however supporting text to re-inforce this is needed.**

Please use this space to explain to the EiP Panel why you support/oppose this particular part of the Draft RSS.

Within both urban and rural areas, many valuable wildlife sites exist on what is technically ‘previously developed land’. Examples include abandoned quarries, ex industrial sites and sites where grassland is interspersed with built development. The wildlife value may have persisted alongside development (eg species-rich grassland which remains around buildings) or have recolonised following cessation of activities (eg quarries). In some cases exceptionally high biodiversity can be found on such sites, as they can offer a large number of microhabitats which species such as specialist invertebrates are able to colonise. This point is backed up by paragraph 13 of PPS9 and the SSA in paragraph 9.30. Large gardens can also form a valuable wildlife habitat and can be a vital component of green infrastructure locally. Whilst planning to make the best use of previously developed land, local authorities must first be aware of the biodiversity interests of their locality and have considered the need for green infrastructure through their GI plan (Policy GI1).

Please use this space to set out any changes to policy/supporting text in this part of the Draft RSS you would like to see.

Add text to 3.7.9 to explain that in some cases land which has been previously developed has itself a value for biodiversity and/or green infrastructure, due either to sympathetic previous land management or to recovery of land since cessation of the previous use.

Section B

Your comments by

We endorse the comments of the South West Biodiversity Partnership which are:

Organisation South West Regional Biodiversity Partnership	Name	Page Number Maps page 1
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I am supporting or opposing the Draft Regional Spatial Strategy for the South West (please specify) ...Opposing

Chapter (section): 3	Page: 50	Policy Reference or Paragraph Number: Key Diagram, Map 7.1, Map 7.3
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Section C

Your comments on the Draft Regional Spatial Strategy for the South West

Policy Reference or Paragraph Number:	South West Region Key Diagram, Maps 7.1 & 7.3, Environmental Designations
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Please use this space to assist the EiP Panel and other respondents by providing a short summary of your comments.

- There are a number of unclear elements to the Key Diagram due to an incomplete key and/or poor shading, including difficulty in distinguishing international nature conservation sites.
- Likewise it is difficult to distinguish sites on Map 7.1.
- Map 7.3 (SW Nature Map) would be clearer if it was larger.

Please use this space to explain to the EiP Panel why you support/oppose this particular part of the Draft RSS.

International nature conservation sites (SAC, SPA and Ramsar) are a very similar shade on the key diagram to the AONBs so it is difficult to see where they lie at a glance. They are also a very pale colour so difficult for the smaller sites to be seen. They also over-shade the National Parks and AONBs where both the landscape and the nature conservation designation should be made clear.

Map 7.1 within the draft RSS shows national and international environmental designations in the South West. It is not possible to view many of the resources on the map as it is produced at too small a scale. Small sites such do not show up at all, particularly when light shading is used (eg international sites, World Heritage Sites). Where some of the environmental designations are overlapping, the top layer obscures details of the layer below, for example, SSSIs are hidden by the AONB layer and National Parks are hidden by the international site layer.

Whilst the shading on Map 7.3 is clearer and the sites do not overlap, it would also benefit from being printed at a larger size to enable clearer viewing.

Please use this space to set out any changes to policy/supporting text in this part of the Draft RSS you would like to see.

- Alter the shading of international sites on the Key Diagram so that they show up but do not over-shade any other designations within which they lie.
- Maps 7.1 and 7.3 may be better as larger A3 pull-out maps as with some other maps in the document. The shading of landscape designations on 7.1 may need to be altered so that landscape and nature conservation designations can overlay each other but still both be distinguished.

Section B

Your comments by

We endorse the comments of the South West Biodiversity Partnership which are:

Organisation South West Regional Biodiversity Partnership	Name	Page Number GI1 page 1
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I am supporting or opposing the Draft Regional Spatial Strategy for the South West (please specify) ...Supporting & Commenting

Chapter (section): 6 **Page:** 137-8 **Policy Reference or Paragraph Number:** GI1, 6.2.16-19

Section C

Your comments on the Draft Regional Spatial Strategy for the South West

Policy Reference or Paragraph Number: GI1, 6.2.16-19, Green Infrastructure

Please use this space to assist the EiP Panel and other respondents by providing a short summary of your comments.

- We strongly support the inclusion of policy GI1, which is essential to achieve biodiversity gains within built up areas and communities with good access to natural greenspace and thus a high quality of life.
- Better cross-referencing to this policy is needed throughout the document, particularly in Chapter 4 (Sub-Regional Strategies).
- We suggest changes of wording to embed biodiversity more firmly in the policy and to clarify to Local Authorities exactly what action is needed to take this policy forward.

Please use this space to explain to the EiP Panel why you support/oppose this particular part of the Draft RSS.

We welcome the section and policy relating to Green Infrastructure (GI1). If this policy, along with the Sustainable Development and Environment policies, are implemented fully and effectively, they could go a long way to alleviating the pressure on the environment and people’s ability to enjoy it brought about by new development in many areas.

However in order to provide a wildlife function, it is essential that biodiversity is embedded into the rationale for these areas and this is not clear enough in the policy and supporting text. The retention of existing wildlife areas and corridors will not be sufficient to achieving a network which functions for wildlife. In addition new habitat linkages and sympathetic management are required to return biodiversity to the heart of our towns and cities and maximise resilience in the face of climate change.

Paragraph 6.2.17 is clear that it may not always be appropriate to combine wildlife habitat and accessibility for people for every segment of the green infrastructure of an area. It is the overall network which should be multifunctional, with different areas performing different roles. For example flood attenuation areas may provide a wildlife and flood defence function, but not be especially accessible; parklands may provide an accessible mix of semi-natural habitat, more formal gardens and historic value. The policy wording should make both these aspects clear.

Though we welcome the references to Green Infrastructure in Development Policies D and F, in most cases, green infrastructure is not specifically mentioned in the list of essential infrastructure required as part of development of an area. With an emphasis on high densities for new development, use of previously-developed land and, in many areas, a reliance on ‘windfall’ sites being brought forward, a strategic approach to greenspace and biodiversity maintenance and enhancement is essential. In cases where it is not already mentioned, reference to green infrastructure requirements should be added to the lists of key infrastructure requirements within sub-regional statements, and to relevant SR policies.

Section B
Your comments by

Organisation South West Regional Biodiversity Partnership	Name	Page Number GI1 page 2
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Local Authorities need clear guidance on how to take this policy forward by developing “a *GI Plan with a delivery programme to support GI Policies*”. Much good work is already being undertaken in the region by Local Authorities; good practice should be established and disseminated to gain consistency of understanding and approach. It should be made clear that the GI plan should encompass existing built-up areas as well as new development, including creation and re-connection of green infrastructure in areas where it is currently deficient. In the case of new development, it is important that green infrastructure is a component of the basic design of a development and created prior to or parallel with the development, to ensure the best chances of it becoming established as a biodiversity and recreation resource before the development is occupied.

Please use this space to set out any changes to policy/supporting text in this part of the Draft RSS you would like to see.

“Green Infrastructure requirements both within the urban area and urban extensions” should be added to the bullets of all paragraphs in Chapter 4 which list key infrastructure requirements for specific sub-regions.

Policy GI1 and supporting text should be amended to provide clarification as detailed above. We suggest the following alterations:

- 6.2.16 should be amended to read:
Careful management will be required to ensure that development contributes to, rather than detracts from the quality of life in urban areas. Green Infrastructure (GI) is an important component of ensuring development provides positive benefits for the region. It can provide many social, economic and environmental benefits to local people and communities and should not just be considered relevant to new development. GI should consist of a strategic network of sites (including parks, woodland, informal open spaces, nature reserves and historic sites) as well as linkages (such as river corridors and floodplains, wildlife corridors and greenways). The overall network of sites should be accessible, multifunctional and managed in a coherent way. Functions of GI include providing:
 - an amenity and recreation resource
 - wildlife habitat and ecological networks
 - flood protection and alleviating existing flood risk
 - an educational resource for the community
 - amelioration of noise and airborne pollution and microclimate regulation
 - and attractive setting for new or existing homes.
- After the first sentence of 6.2.17, insert “*Appropriate surveys will be required to establish what these local characteristics are.*”
- Rephrase Policy GI1 to read:

Development of networks of Green Infrastructure (GI) will be required to enhance quality of life and environment in the region and support the successful accommodation of change. GI will comprise a strategic network of sites planned around existing environmental characteristics. This will take the form of protection, enhancement or extension of existing resources and the provision of new or replacement facilities.

When planning the proposed distribution of development, GI is required as an integral part of development, with provision for a network of GI incorporated in the Spatial Strategy. Local Authorities and partners will:

- Ensure adequate GI provision, for existing and proposed development, through a GI Plan with a delivery programme to support GI policies and address shortfalls.
- *build upon existing expertise and initiatives to identify priorities and partnerships for GI*
- *incorporate GI policies setting out broad locations for GI appropriate to the extent and distribution of development proposed, coordinated across administrative boundaries as appropriate*

Section B

Your comments by

We endorse the comments of the South West Biodiversity Partnership which are:

Organisation South West Regional Biodiversity Partnership	Name	Page Number ENV1 page 1
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I am supporting or opposing the Draft Regional Spatial Strategy for the South West (please specify) ...Supporting & Commenting

Chapter (section): 7 **Page:** 144 **Policy Reference or Paragraph Number:** ENV1

Section C

Your comments on the Draft Regional Spatial Strategy for the South West

Policy Reference or Paragraph Number: ENV1 Protecting and Enhancing the Region’s Natural and Historic Environment

Please use this space to assist the EIP Panel and other respondents by providing a short summary of your comments.

- **We support Policy ENV1.**
- **However there is an important omission in that protection of Local Sites covering wildlife and geological features is not included.**
- **Retention of environmental features as the primary aim should be more strongly emphasised.**

Please use this space to explain to the EIP Panel why you support/oppose this particular part of the Draft RSS.

We support Policy ENV1, and the integrated approach to environmental issues which it takes. However, there are regionally important biodiversity and geodiversity assets that do not receive adequate protection under Policy ENV1 (nor under ENV4). Local Sites is the term used in PPS9 to describe those sites of substantive wildlife or geological importance which are not statutorily designated but still critical to the conservation of an area’s biodiversity and geodiversity. Their importance is identified in PPS9 paragraph 9 which states that they have a “*fundamental role to play in meeting overall national biodiversity targets; contributing to the quality of life and well-being of the community; and in supporting research and education*”. Paragraph 2 of PPS9 also states that RSSs should address regional and sub-regional distribution of priority habitats and species and geodiversity issues. Defra’s *Local Sites: Guidance on their Identification, Selection and Management* (2006) gives further evidence of the wide recognition of the value of Local Sites.

Together with SSSIs, Local wildlife Sites comprise the best habitat in the region, supporting UK, Regional and/or Local Biodiversity Action Plan priority habitats and species. They and are essential to ensure meeting of regional, national and local Biodiversity Action Plan targets.

The system of statutory nature conservation designations is widely recognised as leaving out many sites that are, nevertheless, of significant value for the conservation of wildlife and geological features. This is because the purpose of statutory designations is to provide a representative rather than a comprehensive suite of such sites. It is essential that the Environment Policies of the RSS cover protection and enhancement of Local Sites which complete the series. At present ENV1 refers only to “*local distinctiveness*” and “*surveys will be used to enhance local sites, features and distinctiveness through development*”. Whilst such references are welcomed, they do not fully cover the protection of such sites and the policy wording should be amended to do so.

As currently worded, the second sentence of ENV1 offers a clear path to development which would damage environmental interests. We would suggest this is modified to be clearer that damage to sites should only be allowed where the public interest in permitting the development over-rides the value of the site and there are no alternatives. Where this is the case, the sequence of avoidance, mitigation and full compensation of any residual effects must be followed. Such an approach is backed up by the SSA, paragraph 13.20.

Section B

Your comments by

We endorse the comments of the South West Biodiversity Partnership which are:

Organisation	Name	Page Number
South West Regional Biodiversity Partnership		ENV1 page 2

Please use this space to set out any changes to policy/supporting text in this part of the Draft RSS you would like to see.

- A new sentence should be inserted before the last sentence of ENV1 to read “*Local Sites of wildlife and geological importance will also be conserved and enhanced.*” If appropriate, reference to local landscape, archaeological or historic features in this sentence would not detract from the meaning, provided this was inserted into the wording suggested.
- The second sentence of ENV1 should be modified to read “*Development and changes in land use which would adversely affect these assets will only be permitted where the public interest of the development over-rides the value of the assets and there are no reasonable alternatives. In such cases, local authorities will first seek to avoid loss of or damage to the assets, then mitigate any unavoidable damage, and fully compensate for any loss or damage through offsetting actions.*”

Section B

Your comments by

We endorse the comments of the South West Biodiversity Partnership which are:

Organisation South West Regional Biodiversity Partnership	Name	Page Number ENV4 page 1
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I am supporting or opposing the Draft Regional Spatial Strategy for the South West (please specify) ...Supporting & Commenting

Chapter (section): 7 **Page:** 148 **Policy Reference or Paragraph Number:** ENV4, 7.2.9-12, Appendix 1

Section C

Your comments on the Draft Regional Spatial Strategy for the South West

Policy Reference or Paragraph Number: ENV4, 7.2.9-12, Appendix 1, Nature Conservation

Please use this space to assist the EiP Panel and other respondents by providing a short summary of your comments.

- **We strongly support Policy ENV4 and the inclusion of the South West Nature Map and South West Regional Biodiversity Targets.**
- **However we believe the wording could be amended to clarify the importance of areas outside of Strategic Nature Areas shown on the Nature Map and to make clear to local authorities what they are expected to do as a result of the policy.**
- **Appendix 1 requires the details of key species as referred to in the Policy.**

Please use this space to explain to the EiP Panel why you support/oppose this particular part of the Draft RSS.

We fully endorse use of the South West Nature Map (Map 7.3) within the RSS. This map has been developed through a wide consultation by the South West Biodiversity Partnership in order to identify the best opportunities for large-scale habitat restoration and creation as being the most effective way of achieving the requirements of PPS9 (paragraphs 2-3 and Key Principle iii). Local authorities will play a key and active role in delivering the Nature Map, particularly where large scale development and urban extensions are planned. They need to be aware of this and actively plan for appropriate habitat creation and biodiversity enhancements within development, not just by mapping opportunities and supporting beneficial proposals. In our view ENV4 should provide greater clarity for local authorities to help them fulfil this role.

Policy ENV4 will lead to biodiversity gain and enhancement associated with development. However, there are important habitats and species which lie outside of Strategic Nature Areas (SNAs) as shown on the Nature Map, and it is important that Policy ENV4 does not undermine their conservation and enhancement. For instance SNAs rarely penetrate into the heart of urban areas (because there are fewer opportunities here for large-scale expansion of habitat), but here biodiversity enhancement as part of a green infrastructure plan is crucial to achieving sustainable communities with a high quality of life. As presently worded, the policy blurs the distinction between the Nature Map and local distribution of habitats and species, and as a consequence local authorities might be unsure how to treat each in LDDs.

The region contains important populations of key species, as covered by paragraphs 15-16 of PPS9 which require Local Authorities to take measures to protect the habitats of these species from further decline and to ensure these species are protected from adverse effects of development. Policy ENV4 places a welcome emphasis on enhancement and reconnection of habitat at a landscape scale. However, it is important to note that Strategic Nature Areas as illustrated on the Nature Map are focussed on the location of key habitat which has the greatest potential for expansion and reconnection. Some important species assemblages, as well as habitats, still lie outside the SNAs, as stated on Map 7.3. ENV4 states that “Priority will be give to meeting targets for maintenance, restoration and recreation of priority habitats and species set out in Appendix 1”. However there are no species contained in Appendix 1 which is a major omission.

Section B

Your comments by

We endorse the comments of the South West Biodiversity Partnership which are:

Organisation	Name	Page Number
South West Regional Biodiversity Partnership		ENV4 page 2

The final sentence of ENV4 provides welcome support for proposals which will benefit biodiversity. However by referring to “habitats and species generally” rather than “priority habitats and species” the link with Appendix 1 (as amended) is not clear. Potential mechanisms for funding biodiversity enhancement through the planning system include the Planning Gain Supplement, on which a decision is due this autumn. Policy ENV4 should allow for enhancements through future mechanisms such as this to be targeted to SNAs.

Please use this space to set out any changes to policy/supporting text in this part of the Draft RSS you would like to see.

- **ENV4 should be altered to read:**
“The distinctive habitats and species of the South West will be maintained and enhanced in line with national targets and the South West Regional Biodiversity Action Plan. Special attention will be given to meeting targets for maintenance of current extent and further expansion (through restoration and re-creation) of priority habitats and species set out in Appendix 1, focusing on the Nature Map areas identified in Map 7.3. Local Authorities should use the Nature Map to delineate Strategic Nature Areas in their LDDs to map local opportunities and plan for biodiversity enhancement and to set targets to maintain and expand priority habitats. The local distribution of priority habitats and species outside SNAs should also be taken into account, protecting the sites and features where they occur from harmful development. Proposals which provide opportunities for the beneficial management of SNAs and priority habitats and species should be supported, including creating larger, linked habitats to provide more functional units which are more resilient to climate change. Where opportunities exist through planning mechanisms to fund priority habitat expansion, local authorities should focus these funds, where appropriate, on achieving these objectives within SNAs.”
- **Appendix 1 should be amended to include priority species.** It does not necessarily need to constitute a full list of all species concerned, but could reference those documents which taken together do provide such a list. These would include those sources referenced in footnotes to paragraphs 15 and 16 of PPS9, as well as the South West Biodiversity Action Plan and local Biodiversity Action Plans.

Section B

Your comments by

We endorse the comments of the South West Biodiversity Partnership which are:

Organisation South West Regional Biodiversity Partnership	Name	Page Number CO1 page 1
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I am supporting or opposing the Draft Regional Spatial Strategy for the South West (please specify) ...Opposing.....

Chapter (section): 7 **Page:** 150 **Policy Reference or Paragraph Number:** CO1

Section C

Your comments on the Draft Regional Spatial Strategy for the South West

Policy Reference or Paragraph Number: CO1 Defining the Coastal Zone

Please use this space to assist the EiP Panel and other respondents by providing a short summary of your comments.

- **CO1 should refer to coastal and marine biodiversity and geological assets, as well as to character and appearance of the coast.**

Please use this space to explain to the EiP Panel why you support/oppose this particular part of the Draft RSS.

Coastal and marine biodiversity is one of the South West’s key assets. There are major opportunities for enhancement for wildlife within the coastal zone, as can be seen by the inclusion of undeveloped coastal areas within the SW Nature Map (Map 7.3). In addition the coast provides geological interest, as seen by the inclusion of the Dorset and East Devon Coast as a World Heritage Site. This point should be acknowledged in the text of CO1.

Please use this space to set out any changes to policy/supporting text in this part of the Draft RSS you would like to see.

The first bullet of CO1 should be amended to read “Does not detract from the unspoilt character and appearance, biodiversity or geological value of the coast, and”

Section B

Your comments by

We endorse the comments of the South West Biodiversity Partnership which are:

Organisation	Name	Page Number
South West Regional Biodiversity Partnership		F1 page 1

I am supporting or opposing the Draft Regional Spatial Strategy for the South West (please specify) ...Supporting....

Chapter (section): 7 **Page:** 151 **Policy Reference or Paragraph Number:** F1

Section C

Your comments on the Draft Regional Spatial Strategy for the South West

Policy Reference or Paragraph Number: F1 Flood Risk

Please use this space to assist the EiP Panel and other respondents by providing a short summary of your comments.

- **We support the links made by this policy to opportunities for biodiversity enhancement which natural flooding systems offer.**

Please use this space to explain to the EiP Panel why you support/oppose this particular part of the Draft RSS.

Creation of a large areas of flood retaining wetland habitat could be highly beneficial in terms of biodiversity as well as reducing the flood risk to built-up areas (eg at Taunton). This would reduce the rate of surface water run off and bring additional social and environmental benefits and could be secured with the benefit of developer contributions. Such an approach is in line with Defra's policy *Making Space for Water*.

Please use this space to set out any changes to policy/supporting text in this part of the Draft RSS you would like to see.

Section B

Your comments by

We endorse the comments of the South West Biodiversity Partnership which are:

Organisation	Name	Page Number
South West Regional Biodiversity Partnership		RE6 page 1

I am supporting or opposing the Draft Regional Spatial Strategy for the South West (please specify) ...Opposing

Chapter (section): 7 **Page:** 158 **Policy Reference or Paragraph Number:** RE6, 7.3.12-14

Section C

Your comments on the Draft Regional Spatial Strategy for the South West

Policy Reference or Paragraph Number: RE6, 7.3.12-14, Water Resources

Please use this space to assist the EiP Panel and other respondents by providing a short summary of your comments.

- **We are concerned that, as currently worded, RE6 does not provide adequate protection for the region’s river and wetland habitats from the effects of over-abstraction.**

Please use this space to explain to the EiP Panel why you support/oppose this particular part of the Draft RSS.

Policy RE6 states that rates of planned development must not exceed the capacity of existing water supply systems. However, in some areas existing water supply systems are currently resulting in over-abstraction and are therefore already likely to be resulting in adverse impacts on the environment. In some cases this includes European protected nature conservation assets, for example the River Avon SAC, where Appropriate Assessment will be required to assess impacts. Any new development in areas where over-abstraction is an issue could contribute to adverse impacts on the region’s wetland biodiversity.

Please use this space to set out any changes to policy/supporting text in this part of the Draft RSS you would like to see.

- **Alter the last sentence of RE6 to read “*Local Planning Authorities, through their LDDs, must ensure that rates of planned development do not exceed the capacity of existing water sources and wastewater treatment systems and that current and future supply does not compromise wetland environments. Development must not proceed ahead of essential planned improvements to these systems.”***
- **Add supporting text to 7.3.14 to explain the need to protect rivers and wetlands from the effects of over-abstraction.**

Section B

Your comments by

We endorse the comments of the South West Biodiversity Partnership which are:

Organisation	Name	Page Number
South West Regional Biodiversity Partnership		RE7 page 1

I am supporting or opposing the Draft Regional Spatial Strategy for the South West (please specify) ...Supporting....

Chapter (section): 7..... Page: 159 Policy Reference or Paragraph Number: RE7, 7.3.15-16

Section C

Your comments on the Draft Regional Spatial Strategy for the South West

Policy Reference or Paragraph Number: RE7 7.3.15-16 Sustainable Land Management

Please use this space to assist the EiP Panel and other respondents by providing a short summary of your comments.

- **We support the policy of promoting integrated land management which reinforces specific natural and cultural features. This should be linked to initiatives such as the South West Nature Map.**

Please use this space to explain to the EiP Panel why you support/oppose this particular part of the Draft RSS.

The approach taken in Policy RE7 ties in extremely well with the ethos behind the South West Nature Map (Map 7.3 and Appendix 1). The Nature Map provides a method of targeting landscape-scale projects to those locations which offer the greatest biodiversity benefits. The text in 7.3.16 could be added to link in more specifically with the Nature Map as a targeting tool.

Please use this space to set out any changes to policy/supporting text in this part of the Draft RSS you would like to see.

Text could be added to 7.3.16 to read “The South West Nature Map (Map 7.3) will help target locations for strategic land management projects which offer the greatest biodiversity benefits”.

Section B

Your comments by

We endorse the comments of the South West Biodiversity Partnership which are:

Organisation	Name	Page Number
South West Regional Biodiversity Partnership		RE8 page 1

I am supporting or opposing the Draft Regional Spatial Strategy for the South West (please specify) ...Supporting & Opposing

Chapter (section): 7 Page: 159-60 Policy Reference or Paragraph Number: RE8, 7.3.19-20

Section C

Your comments on the Draft Regional Spatial Strategy for the South West

Policy Reference or Paragraph Number: RE8, 7.3.19-20, Woodlands and Forests

Please use this space to assist the EIP Panel and other respondents by providing a short summary of your comments.

- We support the maintenance and expansion of the region’s woodlands through Policy RE8.
- The importance of orchards and veteran trees highlighted in 7.3.19 should be carried forward into the policy wording.
- Links should be made with the South West Nature Map.
- The policy should allow for tree and woodland removal in helping to restore open ground habitats.

Please use this space to explain to the EIP Panel why you support/oppose this particular part of the Draft RSS.

The SW Biodiversity Partnership supports the inclusion of Policy RE8, linked to the Regional Woodland and Forestry Framework. The SW Biodiversity Implementation Plan (SW BIP) contains a section on Woodlands and Forestry which contains aims, objectives and actions to conserve and enhance the region’s woodland resource.

Paragraph 7.3.19 rightly highlights the importance of old orchards and veteran trees for biodiversity. However this point is not carried through into the policy wording and we suggest that reference should be made to these habitats in RE8 itself.

The SW Nature Map (Map 7.3) includes opportunities for biodiversity enhancement at a landscape-scale and this could be of great help in targeting the best locations for strategic woodland expansion to achieve the best gains for biodiversity. Such links should be made in the text (eg in 7.3.20).

Restoration of priority habitats through removal of plantations and natural regeneration is increasingly recognised as a key biodiversity action. It is highlighted as an issue in the SW BIP (Woodlands and Forestry Objective 3 and associated actions). The restoration of habitats such as lowland and upland heathland and priority grasslands can be achieved successfully through removal of inappropriate tree cover and should be encouraged by this policy. As currently worded, the policy implies all woodland should be retained; this should be revised to allow for flexibility to achieve biodiversity targets within an overall framework of expanded semi-natural woodland in the region.

Section B
Your comments by

Organisation South West Regional Biodiversity Partnership	Name	Page Number RE8 page 2
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Please use this space to set out any changes to policy/supporting text in this part of the Draft RSS you would like to see.

- Following the first sentence of 7.3.20, insert “*The South West Nature Map (Map 7.3) should be used to help target the best locations for strategic woodland expansion.*”
- Insert into 7.3.20 (possibly following the current second sentence) “*Where existing tree cover, e.g non-native plantations, is damaging restorable priority habitats (both native woodland and open ground habitats such as heath and grassland), its removal will be a priority.*”
- We suggest that RE8 is re-phrased as follows:
RE8 Woodlands and Forests
Local authorities and other bodies will support the implementation of the RWFF, ensuring the environmental, social and economic value and character of the region’s woods, forests, orchards and veteran trees are protected and enhanced in a sustainable way. Semi-natural woodland should be maintained at least at 2005 levels and expanded where appropriate to help create ecologically functional landscapes. Achieving the priority habitat targets in Appendix 1 may require the removal of trees and/or woodland and this should be supported. Where woodland is unavoidably lost through development it should be replaced with appropriate new woodland on at least the same scale.”