

Local Development Team
Planning Strategy & Projects
Brighton & Hove City Council
Room 407-410
Hove Town Hall
Hove BN3 3BQ

your ref: LDF/CS/SA/MR/LH/tj
our ref: IM2.2/4/jmp

Eco-Logically
44 Havelock Road
Brighton
BN1 6GF

Tel. 01273 507907
info@Eco-Logically.com

8 August 2008

Consultation on 1. Core Strategy Revised Preferred Options; 2. Sustainability Appraisal DPDs

'If we choose sustainable development, we can secure our gains while averting disasters that appear increasingly imminent. Almost all of the crises that afflict the world economy are ultimately environmental in origin:

Why has our leadership – been so slow to put the pieces together? We exist in a bizarre combination of Stone Age emotions, mediaeval beliefs, and god-like technology.'

EO Wilson, 2008

1. Thank you for your letter of 25 June, from Liz Hobden, seeking views on the Core Strategy Revised Preferred Options. This had a deadline of 5pm on 8th August 2008. Curiously the Sustainable Appraisal (June 2008) gives a different deadline for responses as 1st August 2008. Yet the Core Strategy states 'The appraisal will itself be subject to the same six week period of consultation' (p.7).
2. It is totally unhelpful undertaking a consultation over fundamental documents in the same LDF and then providing different deadline dates for comments. Why has this approach been taken, why was the same deadline date not selected to make the consultation process efficient? What does '...the same six week period of consultation' actually mean?

The representations below will apply to both of these documents and we seek written assurance that this approach is acceptable. We trust this point will also be bought to the inspector's attention in due course.

3. Also it proved unnecessarily difficult obtaining a consultation copy of these documents. Previously, at the LDF 'Statement of Community Involvement' meeting in 2006, it was stated that these documents will be provided in whichever form was most appropriate to the respondent. When we requested hard copies (27 June telephone conversation) it emerged that there were no spare copies remaining and it was best to print these off from the web-site! This simply indicates a level of arrogance in the council not prepared to provide consultation documents but instead preferring respondents to use their own time and resources in obtaining the correct documents to benefit the council's own planning consultation.
4. Detailed comments are appended. However, the most important element is the inclusion of Biodiversity as a new Core Policy (CP5). This was sadly lacking in the previous consultation draft and we wish to see the council now progressing the city's environmental development as enthusiastically as the economic and social. As Wilson (2008) asks; '*Why has our leadership – been so slow to put the pieces together?*' In terms of leading Brighton & Hove City in the 21st Century, we look to the leadership to set the direction and pace that will benefit all its residents; human, native plants and wildlife alike.
5. The most important criticism of these revised policies is the separation of Local Biodiversity from the UK Biodiversity Action Plan (UKBAP). The UKBAP is barely mentioned and the council appears independent from it rather than contributing. This is a regrettable 'isolationist mentality' that needs to be seriously addressed!
6. We note from the 27th July 2008 Event (Hove Town Hall) that this document must be compatible with the South East Plan and await confirmation for how this LDF is compatible particularly with Section D5 (Sustainable Natural Resource Management) and Policy NRM4 which contribute to the targets (NRM2) in the South East Plan.
7. Finally, in March 2002 the council launched its 'Sustainability Strategy'. This provided a series of Action Plans and Objectives including: 'Land Use'; and 'The Natural Environment'. As the LDF is based on sustainability principles why is there no reference to the Sustainability Strategy; surely this should have been a core document for the LDF to draw on? And more importantly, why are the earlier objectives no longer considered relevant after only six years? Hardly sustainable!

We will be grateful if you can acknowledge receipt of these representations and look forward to receiving paper copies of the revised DPDs in due course. Please feel free to contact **Eco-Logically** at the above address if you wish to discuss any matters further.

John Patmore
Naturalist

Reference:

EO Wilson, 2008, Foreword to '*Common Wealth: Economics for a crowded planet*',
by J Sachs. Allen Lane, London

for office use only. Ref No

Please refer to the Core Strategy Revised Preferred Options document and the Quick Guide before completing this response form. Your completed form should be returned to the address given below by no later than **5.00pm on Friday 8th August 2008**

Respondent details

Name	John Patmore		
Organisation (if appropriate)	Eco-Logically	Agent (if applicable)	
Address	44 Havelock Road Brighton	Address	
Post code	BN1 6GF	Post code	
Email:	info@Eco-Logically.com	Email	
Telephone	01273 507 907	Telephone	

Return this form to:

Local Development Framework Team
 Planning Strategy & Projects
 Brighton & Hove City Council
 Hove BN3 3BQ
 Or fax 01273 292379
 Or email ldf@brighton-hove.gov.uk
 Or use the envelope provided

Next Stages

Do you wish to be notified that the Core Strategy has been submitted to the Secretary of State for independent examination and of the adoption of the Core Strategy?

Yes

No

Data Protection Notice: Personal information given on this form will be used by Brighton & Hove City Council (and its agents) in connection with its statutory functions. It will not be used for any other purpose.

Representation – please copy this page of the response form – (or cut and paste in word) and use as many sheets as required for the number of responses you wish

Representation – please copy this page of the response form – (or cut and paste in word) and use as many sheets as required for the number of responses you wish to make

Page or Paragraph Number: Page 7

Preferred Option Reference (Letter/Number e.g. DA1 or CP3):

Do you support, partly support or object to the Preferred Option or part of the document?

(please put 'yes' in one box)

Support	yes	Partly Support		Object	
---------	-----	----------------	--	--------	--

Please give further details of your support or objection in the box below

We note that Sustainable Development within the Bruntland (1987) definition will be the preferred option for the city.

We welcome the inclusion of 'Natural resource protection' and 'environmental enhancement' as one of the four priorities.

Please state the changes you would like to see incorporated into the document or if an alternative option should be considered.

Any other comment

It will be important to actively monitor 'Natural resource protection' and 'environmental enhancement'. Monitoring techniques have been developed nationally which the council should use to measure changes in the city's natural resources and to measure the enhancements to its environment.

These monitoring techniques form part of the UKBAP and should report back to the BAP Partnership on progress.

Representation – please copy this page of the response form – (or cut and paste in word) and use as many sheets as required for the number of responses you wish to make

Page or Paragraph Number:

Page 22

Preferred Option Reference (Letter/Number

SO6 and SO7

Do you support, partly support or object to the Preferred Option or part of the document? (please put 'yes' in one box)

Support

Partly Support yes

Object

Please give further details of your support or objection in the box below

Biodiversity protection and enhancement must be pursued across all suitable areas in the city. The core strategy is making the mistake of allocating biodiversity objectives only to special sites. As stated in the Regional Plan (Section D5, 6.2-6.8):

- Conserving and enhancing the diversity and distribution of habitats and species, as designated sites only represent the best examples of their kind.
- Recognising the importance of green networks and open green space within urban and suburban areas and taking steps to protect and enhance the provision of these.
- Recognising the particular nature of urban wildlife (including those on previously developed land). These may be of local importance for wildlife and for the provision of quality green-spaces
- Improving biodiversity – Opportunities for biodiversity and habitat enhancements at a range of scales need to be identified and realised... that set out the contribution the region can make towards national targets in the UK Biodiversity Action Plan.

Please state the changes you would like to see incorporated into the document or if an alternative option should be considered.

To fully support the intentions to conserve and enhance biodiversity requires a spatial objective beyond just the Downland (SO6). This may eventually be achieved by SO7, but pursuing the UNESCO status will absorb many council resources.

In the meantime there should be a Spatial Objective recognizing the biodiversity value of non-designated land. Such areas will include;

chalk cliffs

wave-cut chalk platform

shingle beaches

woodlands

grasslands

parks

trees

mature private gardens

Any other comment

Cynical greedy property developers will see the creation of special areas for biodiversity as an opportunity to 'divide and conquer'! There needs to be adequate policy protection for biodiversity across the whole city jurisdiction, or it may be driven to extinction before the 'Urban Biosphere Reserve' is even declared!

Representation – please copy this page of the response form – (or cut and paste in word) and use as many sheets as required for the number of responses you wish to make

Page or Paragraph Number: 22

Preferred Option Reference (Letter/Number e.g. DA1 or CP3): SO7

Do you support, partly support or object to the Preferred Option or part of the document?

(please put 'yes' in one box)

Support		Partly Support	yes	Object		
---------	--	----------------	-----	--------	--	--

Please give further details of your support or objection in the box below

There needs to be recognition of the conservation value from geological and geomorphological features. This includes the concept of geodiversity which is currently absent from the Draft LDF.

Please state the changes you would like to see incorporated into the document or if an alternative option should be considered.

Include the term 'GEODIVERSITY' as provided in PPS9. Paragraphs 4 & 5 specifically state:

LOCAL DEVELOPMENT FRAMEWORKS

- 4. Local authorities should take an integrated approach to planning for biodiversity and geodiversity when preparing local development documents. ...
- 5. Local development frameworks should:
 - (i) indicate the location of designated sites of importance for biodiversity and geodiversity, making clear distinctions between the hierarchy of international, national, regional and locally designated sites.

Any other comment

Geodiversity is sadly lacking elsewhere in the LDF, despite adequate national and regional guidance being provided to Local Authorities on this subject.

A series of important geological sites (RIGS) exist, yet do not even warrant a mention in the Glossary!

In combination with the previous representation on other nature conservation areas it will be best to add a NEW Spatial Objective which includes all areas with Biodiversity and Geodiversity value.

Representation – please copy this page of the response form – (or cut and paste in word) and use as many sheets as required for the number of responses you wish to make

Page or Paragraph Number:

36

Preferred Option Reference (Letter/Number e.g. DA1 :

DA2(9)

Do you support, partly support or object to the Preferred Option or part of the document?

(please put 'yes' in one box)

Support

Partly Support

yes

Object

Please give further details of your support or objection in the box below

This Policy DA2, section 9 omits 'Black Rock' which has important geodiversity value.

Any 'masterplan' needs to extend to 500 metres beyond the Marina's hard boundary to incorporate landscape and environmental connections with the wider area.

Please state the changes you would like to see incorporated into the document or if an alternative option should be considered.

Include the 'Black Rock' site in this Policy. Amend to 'Protecting and enhancing the biodiversity and geodiversity...' to ensure potentially damaging developments are assessed adequately.

Any other comment

Potentially damaging developments need to be adequately assessed against biodiversity and geodiversity criteria in the interim, whilst awaiting the production of an 'ecological masterplan'.

Representation – please copy this page of the response form – (or cut and paste in word) and use as many sheets as required for the number of responses you wish to make

Page or Paragraph Number: 55-59

Preferred Option Reference (Letter/Number): DA7

Do you support, partly support or object to the Preferred Option or part of the document? (please put 'yes' in one box)

Support	Partly Support	Object	yes
---------	----------------	--------	-----

Please give further details of your support or objection in the box below

There is no mention of the 'Coastal Vegetated Shingle' or 'Urban' BAPs already published.

Whilst the flood-risk aspect will be addressed as a key issue there seems little else in the environmental assessment. In particular the impact of the Shoreham Harbour development on Hove and Brighton's natural shingle beach recharge from the west.

Please state the changes you would like to see incorporated into the document or if an alternative option should be considered.

Ensure the natural environment is fully assessed in preparing these developments. This includes addressing biodiversity and geodiversity objectives. Identify environmental enhancement opportunities, currently totally absent.

In particular the longer-term impacts 'downstream' of the longshore drift needs addressing.

Any other comment

Has anyone looked at the 'Environment Agency Flood Risk Map'? This development is planned in one of the most risky areas on the Sussex Coast. There is absolutely no logic in this proposal from an environmental perspective. What a barmy development!

Representation – please copy this page of the response form – (or cut and paste in word) and use as many sheets as required for the number of responses you wish to make

Page or Paragraph Number: 63

Preferred Option Reference (Letter/Number):

Do you support, partly support or object to the Preferred Option or part of the document? (please put 'yes' in one box)

Support Partly Support yes Object

Please give further details of your support or objection in the box below

The final point west of the Marina, should be included to the east too. The natural coastline still exists to the east.

Please state the changes you would like to see incorporated into the document or if an alternative option should be considered.

Add: 'Ensure new developments respect and enhance the Marina SNCI(s), the geological importance and the local biodiversity'

Any other comment

Representation – please copy this page of the response form – (or cut and paste in word) and use as many sheets as required for the number of responses you wish to make

Page or Paragraph Number: 101

Preferred Option Reference (Letter/Number): CP5

Do you support, partly support or object to the Preferred Option or part of the document? (please put 'yes' in one box)

Support	Partly Support	yes	Object	
---------	----------------	-----	--------	--

Please give further details of your support or objection in the box below

This policy provides an important mechanism to implement the 'Environment' component that underpins sustainable development.

It was absent from the previous draft and the inclusion of the term Biodiversity (and ultimately including Geodiversity) is warmly welcomed.

However there is insufficient connection to the UKBAP and England Biodiversity Strategy.

Please state the changes you would like to see incorporated into the document or if an alternative option should be considered.

This section should more accurately reflect the real position over 'Biodiversity' in the UK. The UK Biodiversity Action Plan (UKBAP) was published in 1994 but the council still seems to be unaware of its position in relation to the UKBAP.

A summary of the local authority's position in relation to the UKBAP is provided in Annex 1 below and should be included to ensure work on Local Biodiversity follows current best practice which has been provided to local authorities and to local government ecologists.

Any other comment

Add the 'The Natural Environment' and 'Land Use' sections of the council's 2002 'Sustainability Strategy' to the Supporting Documents box. These provided Action Plans and Objectives which are still relevant six years later (mainly because most have still not been progressed).

Representation – please copy this page of the response form – (or cut and paste in word) and use as many sheets as required for the number of responses you wish to make

Page or Paragraph Number: P. 160

Preferred Option Reference (Letter/Number): DA2 - indicator

Do you support, partly support or object to the Preferred Option or part of the document? (please put 'yes' in one box)

Support	Partly Support	Object	yes
---------	----------------	--------	-----

Please give further details of your support or objection in the box below

There is no inclusion of an indicator for 'Natural resource protection and environmental enhancement', despite the important contribution this area makes to the city's natural environment.

Please state the changes you would like to see incorporated into the document or if an alternative option should be considered.

Include the indicator: 'Change in important or sensitive habitats, nature conservation features and species, including those contributing to the BAP'

And amend the target to: 'Maintenance and enhancement of habitats and nature conservation features for meeting BAP and geodiversity objectives'

Any other comment

Black Rock and the Marina's geodiversity importance have been highlighted previously to the council.

Representation – please copy this page of the response form – (or cut and paste in word) and use as many sheets as required for the number of responses you wish to make

Page or Paragraph Number: P. 167

Preferred Option Reference (Letter/Number): DA7 - indicator

Do you support, partly support or object to the Preferred Option or part of the document? (please put 'yes' in one box)

Support Partly Support Object yes

Please give further details of your support or objection in the box below

There is no inclusion of an indicator for 'Natural resource protection and environmental enhancement', despite the important contribution this area makes to the city's natural environment.

Please state the changes you would like to see incorporated into the document or if an alternative option should be considered.

Include the indicator: 'Change in important or sensitive habitats, nature conservation features and species, including those contributing to the BAP'

And amend the target to: 'Maintenance and enhancement of habitats and nature conservation features for meeting BAP and geodiversity objectives'

Any other comment

Longshore drift from the west has recharged Hove and Brighton's beaches since the last glaciation. Overlooking the infrastructure and large engineering developments at Shoreham will have significantly damaging impacts on the city's natural shingle beach maintenance.

Representation – please copy this page of the response form – (or cut and paste in word) and use as many sheets as required for the number of responses you wish to make

Page or Paragraph Number: P. 168

Preferred Option Reference (Letter/Number): SA1 - indicator

Do you support, partly support or object to the Preferred Option or part of the document? (please put 'yes' in one box)

Support Partly Support Object yes

Please give further details of your support or objection in the box below

There is no inclusion of an indicator for 'Natural resource protection and environmental enhancement', despite the important contribution this area makes to the city's natural environment.

Please state the changes you would like to see incorporated into the document or if an alternative option should be considered.

Include the indicator: 'Change in important or sensitive habitats, nature conservation features and species, including those contributing to the BAP'

And amend the target to: 'Maintenance and enhancement of habitats and nature conservation features for meeting BAP and geodiversity objectives'

Any other comment

The council should be celebrating the importance of our beaches and seashore for nature. Vegetated shingle is a globally rare habitat only found in Japan, New Zealand and the UK to any significant extent.

Representation – please copy this page of the response form – (or cut and paste in word) and use as many sheets as required for the number of responses you wish to make

Page or Paragraph Number: P. 171

Preferred Option Reference (Letter/Number): SA4 - indicator

Do you support, partly support or object to the Preferred Option or part of the document? (please put 'yes' in one box)

Support	Partly Support	Object	yes
---------	----------------	--------	-----

Please give further details of your support or objection in the box below

There is no inclusion of an indicator for 'environmental enhancement' and the BAP includes habitats and geodiversity features in addition to just species.

Please state the changes you would like to see incorporated into the document or if an alternative option should be considered.

Include the indicator: 'Change in important or sensitive habitats, nature conservation features and species, including those contributing to the BAP'

And amend the target to: 'Maintenance and enhancement of habitats and nature conservation features for meeting BAP and geodiversity objectives'

Any other comment

The 'Urban Fringe' has an important contribution to make to biodiversity objectives.

Representation – please copy this page of the response form – (or cut and paste in word) and use as many sheets as required for the number of responses you wish to make

Page or Paragraph Number: P. 171

Preferred Option Reference (Letter/Number e.g. DA1 or CP3): SA5 - indicator

Do you support, partly support or object to the Preferred Option or part of the document?

(please put 'yes' in one box)

Support	Partly Support	Object	Yes
---------	----------------	--------	-----

Please give further details of your support or objection in the box below

There is no inclusion of an indicator for 'environmental enhancement' and the BAP includes habitats and geodiversity features in addition to just species.

Please state the changes you would like to see incorporated into the document or if an alternative option should be considered.

Include the indicator: 'Change in important or sensitive habitats, nature conservation features and species, including those contributing to the BAP'

And amend the target to: 'Maintenance and enhancement of habitats and nature conservation features for meeting BAP and geodiversity objectives'

Any other comment

The 'South Downs' have an important contribution to make to biodiversity objectives.

Representation – please copy this page of the response form – (or cut and paste in word) and use as many sheets as required for the number of responses you wish to make

Page or Paragraph Number: P. 180

Preferred Option Reference (Letter/Number e.g. DA1 or CP3): CP5 - indicator

Do you support, partly support or object to the Preferred Option or part of the document?

(please put 'yes' in one box)

Support	Partly Support	Object	yes
---------	----------------	--------	-----

Please give further details of your support or objection in the box below

There is currently no LBAP for the city, but there are BAP targets which exist at a Sussex, Regional and National level, which the city should contribute to. When a LBAP is eventually produced this will link in with the existing BAP targets and networks.

It will be more effective to set indicators which addresses all BAP targets covering the city irrespective of the level at which the target was agreed.

Please state the changes you would like to see incorporated into the document or if an alternative option should be considered.

Amend the indicator to: 'Change in important or sensitive habitats, nature conservation features and species, including those contributing to BAP objectives'

And amend the target to: 'Maintenance and enhancement of habitats and nature conservation features for meeting BAP and geodiversity objectives'

Any other comment

Refer to Annex I attached on the relationship between the Local Authority and the UKBAP.

Representation – please copy this page of the response form – (or cut and paste in word) and use as many sheets as required for the number of responses you wish to make

Page or Paragraph Number: P. 180

Preferred Option Reference (Letter/Number e.g. DA1 or CP3): CP5 – indicator

Do you support, partly support or object to the Preferred Option or part of the document?

(please put 'yes' in one box)

Support Partly Support Object yes

Please give further details of your support or objection in the box below

There is no inclusion of enhancing the understanding and appreciation of biodiversity features by residents and visitors to the city.

Please state the changes you would like to see incorporated into the document or if an alternative option should be considered.

Include a new indicator for understanding and appreciating local biodiversity and geodiversity.

Add a corresponding target for: 'number of high quality information resources providing interpretation of city's biodiversity. Number of people accessing these resources and awareness of Brighton and Hove's biodiversity by all residents and visitors'

Any other comment

The city is becoming increasingly urbanized. This is excluding nature, and excluding people's access to nature. Don't wreck one of the fundamental strengths that makes our green city nestling between the Downs and the Sea unique.

Representation – please copy this page of the response form – (or cut and paste in word) and use as many sheets as required for the number of responses you wish to make

Page or Paragraph Number: Sustainability Appraisal.P.30

Preferred Option Reference (Letter/Number e.g. DA1 or CP3): Page 30 – Sustainability & Climate Change

Do you support, partly support or object to the Preferred Option or part of the document?

(please put 'yes' in one box)

Support	Partly Support	Object	yes
---------	----------------	--------	-----

Please give further details of your support or objection in the box below

The Sustainability Appraisal fails to mention the UKBAP.

Please state the changes you would like to see incorporated into the document or if an alternative option should be considered.

Mention the position that Brighton & Hove's LDF plays in relation to the UKBAP. Emphasize the relationship between a Local BAP and the UKBAP for setting objectives, targets and reporting mechanisms to a nationally agreed framework (See Annex 1).

Any other comment

It is highly regrettable that Brighton & Hove city has chosen to become isolated from the wider biodiversity partnerships. The city exists within a natural coastal context that contributes to southern England's biodiversity.

Brighton & Hove council should be celebrating this important position.

Annex 1. The relationship between Biodiversity at the Local Authority and the UK Biodiversity Action Plan.

The Disconnection

1. This representation has highlighted the significant disconnection between the Local Biodiversity Action Plan (LBAP) and the UK BAP. This annex forms part of the formal representation by *Eco-Logically* and aims to shed some understanding on a situation which is currently muddled within the 2008 LDF consultation and its associated Sustainability Appraisal.

Best Practice

2. Best practice guidance has been provided since 1999 to City Councils over several years (eg: 'Integrating Biodiversity into Local Development Frameworks', 2005) so there is no good reason why this should have been ignored in preparing this LDF.

Global Sustainability and The UK BAP

3. Following the Rio Earth Summit on Sustainable Development the Convention on Biological Diversity (CBD) was signed in 1992. This gives a commitment by signatory nations to produce Biodiversity Action Plans (BAP).
4. Biodiversity is not an 'end in itself'. Instead it provides a mechanism for accounting for natural features within the environmental component of sustainable development.
5. In 1994 the UK Government published 'Biodiversity: the UK Action Plan' which provided a framework for developing a series of objectives, targets and actions to deliver the UK BAP.
6. This has resulted in a series of networks across the country, and within the regions to progress BAPs. These links aim to cascade national objectives down to local delivery, where progress can then be assessed as a series of contributions by each Local BAP (See illustrative flow-chart below).

Local Authority Involvement

7. Government wants to see biodiversity valued, safeguarded and enhanced. Biodiversity benefits are highly dependent on local action because biodiversity is ultimately lost or conserved at the local level. Therefore Local Authorities have a key role to play in conserving biodiversity. This will include local authorities fully integrating biodiversity considerations into their policies and strategies; for instance, to promote biodiversity objectives within social and economic activities and promote an understanding of biodiversity through community involvement.

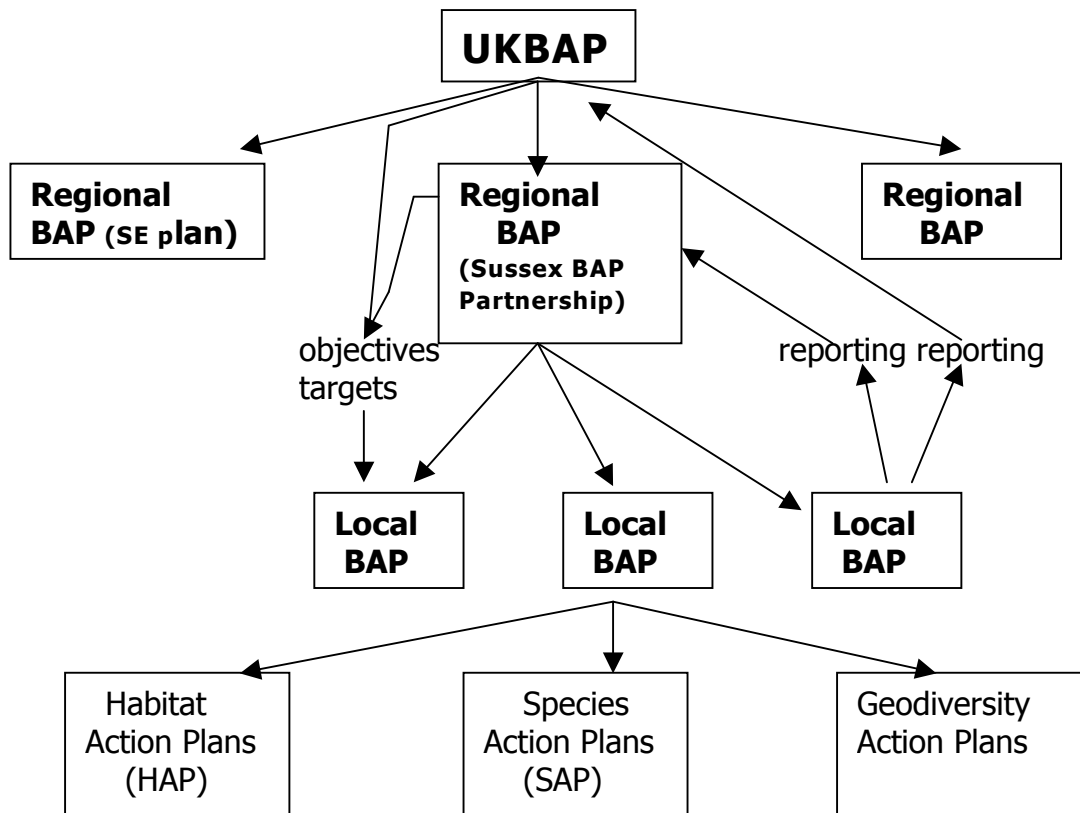


Diagram 1: Linkages between National (UKBAP), Regional BAPs and Local BAPs (LBAP)

Note: only a few linkages are illustrated here to indicate connectivity between National, Regional and Local BAP delivery. The **key point** is that all contribute to the UKBAP and should not become isolated plans lacking wider coherence and relevance.

8. Brighton & Hove city council can contribute at many levels. National BAPs have been produced for particular species and regional BAPs exist such as those produced by the Sussex Biodiversity Partnership. This plan involves key public and voluntary sector agencies and bodies in East and West Sussex whose aim is to implement targeted action plans for habitats and species with biodiversity importance. These plans outline a series of actions and targets required to safeguard and enhance the survival of individual habitats and species. There is therefore no need to duplicate these action plans for Brighton & Hove's biodiversity features.
9. Brighton & Hove city council need to be aware of the BAPs which are relevant to the city's biodiversity. Then the objectives and targets can be set in a meaningful way which contributes to the UKBAP, and ultimately to Sustainable Development at the Global level.

Reference sources

- UK Biodiversity Action Plan*, 1994, HMSO <http://www.ukbap.org.uk>
- The Sussex Biodiversity Action Plan*, 1998 to date, Sussex Biodiversity Partnership
<http://www.biodiversitysussex.org>
- Position Statement on Biodiversity*, 2001, Local Government Association (LGA)
www.lga.gov.uk/Documents/Briefing/Our_Work/Environment/biodiversity.pdf
- Working with the grain of nature: a biodiversity strategy for England*, 2002.
Department for Environment, Food and Rural Affairs.
www.defra.gov.uk/wildlife-countryside/biodiversity/biostrat/index.htm
- Increasing the Momentum*, 2004. Association of Local Government Ecologists.
www.alge.org.uk/
- Framework for Biodiversity, Integrating Biodiversity into Local Development Frameworks*, 2005. Association of Local Government Ecologists
- Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System*, ODPM 2005
- Planning for Biodiversity and Geological Conservation: A Guide to Good Practice*, ODPM, DEFRA, English Nature, 2005
- Planning for Biodiversity, A Good Practice Guide*. 1999. Royal Town Planning Institute
- Biodiversity's contribution to the quality of life*, 2003. English Nature Research #510.

Eco-Logically

August 2008