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Development Strategy Manager
South Lakeland District Council
South Lakeland House
Lowther Street
Kendal
LA9 4DL

Natural England
Consultation Service
Hornbeam House
Electra Way
Crewe Business Park
CREWE
CW1 6GJ

T: 0300 060 3900

BY EMAIL ONLY

Dear Mr Hudson

South Lakeland Land Allocations DPD – Conformity with NPPF

Thank you for your consultation dated 1 June 2012.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

It is Natural England's view that, in general, the South Lakeland Land Allocations DPD is in conformity with the National Planning Policy Framework (NPPF). We would like to make the following recommendations to further improve conformity.

As the LPA will be aware, there is a designated Nature Improvement Area (NIA) within the Local Plan area; Morecambe Bay Limestones and Wetlands NIA. Paragraph 117 of the National Planning Policy Framework (NPPF) states that:

'where Nature Improvement Areas are identified in Local Plans, consider specifying the types of development that may be appropriate in these Areas' (NPPF para.117).

Whilst paragraph 157 of the NPPF states that Local Plans should:

'contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.' (NPPF para.157).

In order to improve conformity with the NPPF, Natural England recommends that the Local Plan should include references to the Morecambe Bay Limestones and Wetlands NIA. The LPA should consider outlining the developments that may be appropriate in the NIA. Natural England advises that the Local Plan should promote the aims and objectives of the NIA and set out a clear strategy for the conservation, enhancement and protection of biodiversity within the NIA.

This would also aid compliance with paragraph 117 of the NPPF, which states that in the interest of minimising impacts on biodiversity and geodiversity, policies should:

'promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan' (NPPF para. 117).

Natural England advises that the above actions should be taken so that the DPD is in conformity with Section 11 Paragraph 109 of the NPPF, which states that the planning system should contribute to the conservation and enhancement of the natural environment.

With regards to the Land Allocations DPD, the site allocations must be in conformity with paragraphs 110 of the NPPF, which states:

'Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework.'

Natural England supports site allocations on brownfield land where they are not of high environmental value, as stated in paragraph 111 of the NPPF:

'Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land.' (NPPF para.111)

It should be noted that brownfield sites that have been vacant for long periods can be home to protected species (e.g. Great Crested Newts) and other wildlife interest and can form a valuable part of the local green infrastructure network. Local Authorities should take this into account in the Land Allocations and their policies.

Other than the above points, Natural England believes that the South Lakeland Land Allocations DPD is in conformity with key natural environment aspects of the National Planning Policy Framework and hopes that our views and issues raised are taken into account by the inspector.

For any correspondence or queries relating to this consultation only, please contact Bryn Pryce on 0300 0600783. For all other correspondence, please contact consultations@naturalengland.org.uk.

Yours sincerely



Bryn Pryce
Temporary Adviser
Land Use Operations

Natural England
Foundry House
3 Millsands
Riverside Exchange
Sheffield S3 8NH