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Dear Mr McNeill

Development Management Policies Development Plan Document – Issues and Options Discussion Paper

Thank you for your consultation received on 6th November 2015 on the above.

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.

Natural England notes that the Council together with Lancaster City Council is preparing a separate Local Plan for the Arnsdale and Silverdale Area of Outstanding Natural Beauty (AONB), (Natural England has provided comments to you on this consultation via correspondence dated 16 December 2015, reference: 170910). This will contain some development management policies bespoke to the AONB; however, some policies in the South Lakeland Development Management Policies DPD will also apply to the AONB within South Lakeland. It is important that the policies in this plan are aligned with the AONB policies in the Local Plan for the Arnsdale and Silverdale AONB. It is also important that the accompanying Sustainability Appraisal Scoping also considers the compatibility between the plans.

Natural England provided comments on the draft Sustainability Appraisal Scoping Report on 15th October 2015, reference 165851, and as the version we have been consulted on currently appears to be same version as referred to above, our comments remain the same. For ease of reference I have attached this response to the email.

We have the following comments to make:

5 Quality Environment and Quality Design

Natural England would expect biodiversity and geodiversity, soils, priority habitats, ecological networks, protected species to be covered under the heading of the natural environment.

We do not think it is helpful to group natural and built heritage under this heading as it seems to focus more on the 'built'. It would be preferable to have a separate section on conserving, protecting and enhancing the natural environment.

Designated sites

The plan should set criteria based policies to ensure the protection of designated biodiversity and geological sites. Such policies should clearly distinguish between international, national and local sites. Natural England advises that all relevant Sites of Special Scientific Interest (SSSIs), European sites (Special Areas of Conservation and Special Protect Areas) and Ramsar sites should be shown on a map for the area so they can be clearly identified in the context policies for development. Designated sites should be protected and, where possible, enhanced.

The Magic website is a useful source of information on the location and qualifying features of the international and national designations. Natural England's Impact Risk Zones, relating to designated sites, is another useful tool to identify risks associated with different types of development. Natural England has also produced Site Improvement Plans (here) for European sites which provide an overview of the issues affecting the condition of the site(s) and outlines the priority measures required to improve the condition of the features. Local Environmental Records Centres should also be of assistance and often hold information on Local Wildlife Sites.

Landscapes

Natural England expects the plan to include policies to protect and enhance valued landscapes, as set out in the National Planning Policy Framework (NPPF). The plan's policies should be informed by National Character Areas (NCAs). These should be supplemented by a more detailed Landscape Character Assessment (LCA) of the plan area.

We advise the Local Planning Authority (LPA) to take into account of the AONB Management Plan and to seek the views of the AONB Partnership. Policies brought forward through the plan should avoid significant impacts on protected landscapes, including those outside the plan's area and early consideration should be given to the major development tests set out in paragraph 116 of the National Planning Policy Framework (NPPF).

Biodiversity and Geodiversity

The Plan should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity. There should be consideration of geodiversity conservation in terms of any geological sites and features in the wider environment.

A strategic approach for networks of biodiversity should support a similar approach for green infrastructure (outlined below). New development should incorporate opportunities to enhance biodiversity, wherever possible.

Priority habitats, ecological networks and priority and/or legally protected species populations
The Plan should be underpinned by up to date environmental evidence, this should include an assessment of existing and potential components of ecological networks and this will require working with Local Nature Partnerships, as recommended by paragraph 165 of the NPPF.

Priority habitats and species are those listed under Section 41 of the Natural Environment and Rural Communities Act, 2006 and UK Biodiversity Action Plan (UK BAP). Further information is available here UK BAP priority species and habitats. Local Biodiversity Action Plans (LBAPs) identify the local action needed to deliver UK targets for habitats and species. They also identify targets for other habitats and species of local importance and can provide a useful blueprint for biodiversity enhancement in any particular area.

Protected species are those species protected under domestic or European law. Further information can be found here Standing advice for protected species. Sites containing watercourses, old buildings, significant hedgerows and substantial trees are possible habitats for protected species. Ecological networks are coherent systems of natural habitats organised across whole landscapes

so as to maintain ecological functions. A key principle is to maintain connectivity - to enable free movement and dispersal of wildlife e.g. badger routes, river corridors for the migration of fish and staging posts for migratory birds.

Green Infrastructure

GI refers to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation, food production, wildlife habitats and health & well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands.

Green infrastructure is also relevant in a rural context, where it might additionally refer to the use of farmland, woodland, wetlands or other natural features to provide services such as flood protection, carbon storage or water purification.

Evidence of a strategic approach can be underpinned by Green Infrastructure Strategy. We encourage the provision of green infrastructure to be included within a specific policy in the plan or alternatively integrated into relevant other policies, for example biodiversity, green space, flood risk, climate change, reflecting the multifunctional benefits of green infrastructure.

Soils

These should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.

The plan policies should safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future. To assist in understanding agricultural land quality within the plan area and to safeguard 'best and most versatile' agricultural land in line with paragraph 112 of the National Planning Policy Framework, strategic scale Agricultural Land Classification (ALC) Maps are available. Natural England also has an archive of more detailed ALC surveys for selected locations. Both these types of data can be supplied digitally free of charge by contacting Natural England. Some of this data is also available on the www.magic.gov.uk website. The planning authority should ensure that sufficient site specific ALC survey data is available to inform plan making.

Climate change and flood risk

The Plan considers climate change adaption but could further recognise the role of the natural environment to deliver measures to reduce the effects of climate change, for example tree planting to moderate heat island effects. In addition factors which may lead to exacerbate climate change (through more greenhouse gases) should be avoided (e.g. pollution, habitat fragmentation, loss of biodiversity) and the natural environment's resilience to change should be protected. GI and resilient ecological networks play an important role in aiding climate change adaptation.

Policies should positively contribute to reducing flood risk by working with natural processes and where possible use Green Infrastructure policies and the provision of SUDs to achieve this. The NPPG provides further guidance on information sources for the water environment which should be used to inform the Local Plan and the SA/SEA.

Water Quality

Natural England expects the Plan to consider the strategic impacts on water quality and resources as outlined in paragraph 156 of the NPPF. We would also expect the plan to address flood risk management in line with the paragraphs 100-104 of the NPPF.

The Plan should be based on an up to date evidence base on the water environment and as such the relevant River Basin Management Plans should inform the development proposed in the Local Plan. These Plans (available [here](#)) implement the EU Water Framework Directive and outline the

main issues for the water environment and the actions needed to tackle them. Local Planning Authorities must in exercising their functions, have regard to these plans.

The Plan should contain policies which protect habitats from water related impacts and where appropriate seek enhancement. Priority for enhancements should be focussed on N2K sites, SSSIs and local sites which contribute to a wider ecological network.

Air pollution

We would expect the plan to address the impacts of air quality on the natural environment. In particular, it should address the traffic impacts associated with new development, particularly where this impacts on European sites and SSSIs. The environmental assessment of the plan (SA and HRA) should also consider any detrimental impacts on the natural environment, and suggest appropriate avoidance or mitigation measures where applicable.

The effects on local roads in the vicinity of any proposed development on nearby designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area (a greater distance away from the development) can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition/acidification. APIS provides a searchable database and information on pollutants and their impacts on habitats and species.

For any queries relating to the specific advice in this letter only please contact Kate Wheeler on 07769 918711. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Kate Wheeler
Cheshire, Greater Manchester, Merseyside and Lancashire Area