

Natural England Response to the South Lakeland Draft Development Management Policies DPD

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Natural England's response to the South Lakeland Draft Development Management Policies DPD are set out below:

2.1 Policy DM1 – General Requirements for all Development

We welcome the inclusion of requirement number 7 and suggest it be modified to the more ambitious 'protect and enhance' where it applies to ecological networks, biodiversity and geological assets. A suitable mechanism could be put in place in order to achieve net biodiversity and green infrastructure gain simply and effectively. We also suggest an alteration to the wording to the final sentence of requirement 7, to include sites with national (domestic) biodiversity protection. The section dealing with Habitats Regulation Assessment should read, 'HRA must be carried out by the competent authority for any new plan or project which may affect the designated interest features of a European Protected Site'. Reference to mitigation should be removed as the circumstances where mitigation would apply are very tightly defined under the legislation and mentioning it here is likely to be misleading.

We welcome the inclusion of requirement 8 and suggest the inclusion of landscape and visual amenity in this requirement.

We suggest the inclusion of landscape and visual amenity in requirement 9.

2.2 DM2 – Achieving High Quality Design

We welcome the inclusion of requirement 2 with regards to protecting the natural landscape. We suggest a bullet point be added to encourage enhancement of the natural environment, landscape and visual amenity, for example by appropriate tree, woodland or hedgerow planting.

We suggest that requirement 9 is adapted to a similar style to that of requirement 2, including the more ambitious language employed, 'Development proposals must... ..incorporate features that support and enhance...' We also suggest that a more comprehensive suite of potential habitat creation, urban greening and climate change options is added here, in a similar nature to our suggestion for requirement 2, above. Typical habitat creation to increase ecological connectivity, improve air quality and reduce flood risk might include; tree (including fruit tree) or woodland / orchard planting; areas of scrub / rough grassland / wildflower mixes; creation of new hedgerow or other boundary features; creation of new ponds / reedbeds / wildlife friendly ditches.

We suggest that internal lighting is added under requirement 10. Light pollution from internal lighting can have a significant impact on wildlife depending the size and location of windows used in the design.

We suggest that the circumstances where there is a requirement for Landscape and Visual Impact Assessment (for example the thresholds for size, location or type) are clearly defined within the Development Management Policies document. This should include where there may be a landscape or visual amenity impact on a protected landscape.

2.4 DM4 – Green Infrastructure and Open Space

We welcome the inclusion of DM4 and the requirement that new development should be designed to deliver net green infrastructure gains. We suggest an introductory paragraph (similar in content to the second to last paragraph, 'All development proposals will...') be inserted before the section on trees. We suggest that the highest possible threshold is placed on the loss of ancient woodland as this habitat cannot practicably be re-created. Where impacted by development a high ratio of new woodland planting should be applied in order to compensate for any loss, we suggest a ratio of 30ha created for every 1ha lost. We suggest that new trees and other vegetation should be of native species. We welcome the inclusion of a commuted sum to ensure adequate green infrastructure provision where this is not provided. This principle could be expanded in other policy areas, potentially using the environment bank approach, to provide a strategic approach to green infrastructure provision.

2.7 DM7 – Addressing Pollution and Contamination Impact

We suggest that the impact of both noise and light pollution on wildlife is specifically detailed in this policy. There is strong evidence that both are particularly disturbing to wildlife as well as impacting on people's interactions with their local environment.

We also suggest that the impact of air pollution on nationally or internationally protected sites and other sensitive habitats is referred to in this policy.

General Comment

We suggest that landscape, visual amenity and the environment should be addressed in a consistent way through the remaining policy areas. We suggest that it should be comprehensively dealt with under DM1 and DM2, thus giving clarity that the requirement to protect and enhance landscape and the natural environment apply to all development and reducing the need to replicate the information in subsequent policy areas, unless a particular additional criteria applies.