

Richard Mapletoft

From: Mahoney, Sean (NE) <>
Sent: 29 March 2017 05:41
To: Localdevelopment
Subject: Rushcliffe Local Plan consultations
Attachments: LAPP FO letter_consultees.pdf; 177779 Issues and Options documents Local Plan Part 2.pdf

Dear Sir/Madam,

Planning Consultation: Rushcliffe Local Plan Part 2: Land and Planning Policies (Further Options), Green Belt Review - Part 2(b) - for additional sites, A Community Infrastructure Levy Preliminary Draft Charging Schedule

Thank you for your consultation below and attached.

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 has made comments on previous iterations of the Rushcliffe Local Plan. We have nothing further to add here except to reiterate the advice in our letter of 16 March 2016 (attached) reminding Rushcliffe Borough Council of its duty to protect nationally and internationally designated nature conservation sites from the impacts of development.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this email only please contact me on 02080261940. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Kind Regards

Sean Mahoney

Lead Adviser

Sustainable Development

East Midlands Area Team

Natural England

Apex Court
City Link
Nottingham
NG2 4LA

Mobil

www.gov.uk/natural-england

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

Natural England offers two chargeable services – The Discretionary Advice Service (**DAS**) provides pre-application, pre-determination and post-consent advice on proposals to developers and consultants as well as pre-licensing species advice and pre-assent and consent advice. The Pre-submission Screening Service (**PSS**) provides advice for protected species mitigation licence applications.

These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, reduce the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

We now offer free and chargeable advice to land owners and managers planning works on Sites of Special Scientific Interest through the [SSSI Advice Service](#).

From: Localdevelopment [<mailto:Localdevelopment@rushcliffe.gov.uk>]
Sent: 17 February 2017 16:49
To: Localdevelopment
Subject: Rushcliffe Local Plan consultations

Dear Sir/Madam

Rushcliffe Borough Council is consulting on 'Further Options' for its Local Plan Part 2 **until 5pm on Friday 31 March 2017**.

Also being consulted on at the same time are:

- A draft Rushcliffe Green Review (Part 2(b)) for additional sites; and
- A Community Infrastructure Levy Preliminary Draft Charging Schedule.

Further details are set out in the attached letter and at www.rushcliffe.gov.uk/planningpolicy, including where the consultation documents can be viewed and how comments can be made.

You have been sent this email as you are currently registered on our consultation mailing list. If you no longer wish to be contacted in relation to Local Plan matters please let us know by replying to this email.

Kind regards

Planning Policy
Rushcliffe Borough Council

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Date: 16 March 2016
Our ref: 177779
Your ref: none



Richard Mapletoft
Planning Policy Manager
Rushcliffe Borough Council
Localdevelopment@rushcliffe.gov.uk

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Richard

Planning consultation: Rushcliffe Local Plan (Part 2) Land & Planning Policies: Issues and Options; Draft Sustainability Appraisal Scoping Report; and Green Belt Review

Thank you for your consultation which was received by Natural England on 29 January 2016.

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 welcomes the opportunity to comment at the early stages of preparation of the Land & Planning Policies (LAPP) document. We have reviewed each of the above documents and addressed the questions which are particularly relevant to our interests in the natural environment. Natural England's key interests and those which we would expect to see addressed through development include biodiversity; geodiversity; landscape character and quality; green infrastructure; climate change; access to the countryside and other open space; the protection and enhancement of soils; and environmental land management.

1. Land & Planning Policies - Issues and Options

Section 2: Housing Development

Whilst Natural England has no specific comments on the potential housing sites either in urban areas, the key settlements or within rural areas we offer the following general advice:

We consider that there are a number of environmental constraints which should be considered when allocating sites for development. Although the list below is not exhaustive, examples of environmental considerations include:

- International and national nature conservation sites, including Special Protection Areas (SPA), Special Areas of Conservation (SAC), Ramsar sites, SSSIs, National Nature Reserves.
- Locally and regionally designated sites for geodiversity and biodiversity.
- Landscape character
- UK BAP habitats and significant proportions of BAP or protected species.
- Sites where there is significant opportunity for biodiversity gain.
- Ancient woodland.
- Access to greenspace.



The sites proposed for housing development should be on land with the least environmental or amenity value i.e. avoiding designated sites and landscapes, Best & Most Versatile (BMV) land, and areas at risk of flooding.

The housing allocations should be consistent with local plan landscape policies. A Landscape and Visual Impact Assessment (LVIA) should be undertaken for each site under consideration. The allocation should conserve and enhance the landscape character of the area (in line with the National Character Areas, the Nottinghamshire Landscape Character Assessment and site's LVIA).

Natural England does not hold protected species records and therefore cannot advise as to the likelihood of their presence on sites. Information on non-statutory sites and species records may be obtained from the Nottinghamshire Local Wildlife Trust or the Nottinghamshire Biological and Geological Records Centre and such information should be considered when assessing sites for development.

We also recommend that reference is made to the [Natural England Standing Advice for Protected Species](#) which is available on our website. It helps local planning authorities better understand the impact of development on protected or priority species should they be identified as an issue at particular developments. This also sets out when, following receipt of survey information, the authority should undertake further consultation with Natural England.

Landscape Character

Question 41

Natural England acknowledges that the Core Strategy includes a policy on landscape character which refers to the Greater Nottingham Landscape Character Assessment. We consider that the Local Plan would also benefit from a criteria based policy on landscape character as this would help towards the protection and enhancement of local landscapes. We suggest that it should be informed by the advice set out in the three National Character Areas (NCA) profiles which fall within the Rushcliffe area i.e. NCA 48: Trent & Belvoir Vales; NCA 74 Leicestershire & Nottinghamshire Wolds and NCA 69: Trent Valley Washlands. You may find the environmental opportunities sections within the NCA profiles particularly useful. The policy could include provision for developments to strengthen the sense of place by protecting and enhancing existing hedgerows, woodland, open spaces and other landscape features. Large scale landscaping measures that may be included within strategic developments should link into the Green Infrastructure network. A locally specific policy could also include provision for tree planting around settlement fringes to help reduce visual impact and integrate new development into the landscape. For more information on the NCAs please see our website at: <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

Renewable and Low Carbon Energy Generation

Question 48

We suggest that the Plan should take full account of the capacity of the natural environment to accommodate renewable/low carbon energy generation infrastructure and particularly avoid designated landscapes and sites. The development management policies should address biodiversity and landscape impacts, including cumulative landscape and visual impacts.

Green Infrastructure

Question 54

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 and adaptation, 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. GI 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.

We would therefore suggest that all of the areas of land that you have listed under question 54 could potentially be included within the GI network. To enhance the GI opportunities across the Borough it is important to look at how different land uses could be linked and also to consider how ecological links could also be supported.

Question 55

We acknowledge that Policy 16 of the adopted Core Strategy provides a strategic approach to GI and identifies a broad network of primary GI corridors and assets on the key diagram. The LAPP document needs to identify GI assets and links at a more local level and we agree that the criteria set out in section 3 of Policy 16 is a useful starting point to do this. The LAPP also needs to show how the approach set out in the Core Strategy can be delivered using mechanisms such as planning obligations and Community Infrastructure Levy.

A GI strategy would provide a comprehensive approach towards GI provision and the relevant components of the strategy should be incorporated into the plan and a clear delivery framework could be identified. However this is not the only approach and local plan policies could provide appropriate guidance together with Infrastructure Delivery Plans or Supplementary Planning Guidance. We suggest however that it is important that a map showing the GI network and key GI assets and/or zones (existing and aspirational) is established.

We suggest it is likely that there is evidence available to support the identification of existing and proposed Green Infrastructure. For instance the Rushcliffe Biodiversity Opportunity Mapping report (July 2015) would provide useful evidence to identify valuable biodiversity assets which could be linked or form part of the GI network. In addition Public Rights of Way maps, Open space inventories and the Nottinghamshire Landscape Character Assessment would provide useful information. Another useful reference is Town and Country Planning Association publication [Planning for a healthy environment - good practice guidance for green infrastructure and biodiversity](#)

Open Space, Sport and Recreation Standards

Question 58

We recommend the use of the Natural England's Accessible Natural Greenspace Standards (ANGSt). These provide a set of benchmarks for ensuring adequate access to natural and semi-natural greenspace near to where people live. The ANGSt methodology provides a powerful tool in assessing current levels of accessible natural greenspace and planning for better provision. Further information on delivering and managing natural and semi-natural greenspace can be found in our report Nature Nearby - Accessible Natural Greenspace Guidance (Natural England 2010) http://webarchive.nationalarchives.gov.uk/20140605090108/http://www.naturalengland.org.uk/region/east_of_england/ourwork/gi/accessiblenaturalgreenspacestandardangst.aspx

Biodiversity

Question 59

Core Strategy Policy 17 has established a strategic approach to biodiversity which plans positively for the creation, protection, enhancement and management of ecological networks and provides protection for nationally and locally designated sites.

The LAPP document could identify a more detailed ecological network to provide a coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. A key principle is to maintain and increase connectivity - to enable free movement and dispersal of wildlife. A further key principle is to ensure resilience to climate change. You may find Natural England's National Biodiversity Climate Change Vulnerability Assessment data of use in determining the vulnerability of your ecological networks to climate change. The data can be found [here](#) and the report can be found [here](#).

Priority habitats can be found on the [magic](#) website. Natural England does not hold records of priority or legally protected species but the Local Records Centre may be able provide these. The plan should promote the preservation, restoration and recreation of priority habitats. We suggest that the Rushcliffe Biodiversity Opportunity Mapping report (July 2015) also provides useful evidence on priority habitats and would assist in identifying ecological corridors.

New development should incorporate opportunities to enhance biodiversity, wherever possible. By incorporating ecologically sensitive design and features for biodiversity early on within a development scheme, significant improvements for biodiversity can be achieved, along with easier integration with wider environmental, design and planning aspects. By addressing ecological aspects early on, design aspects such as site layout can be tailored to provide enhancements and improvements for biodiversity that may not be possible later on within the design process. Measures to encourage biodiversity can include green roofs, planting and landscaping using native species, setting up bird and bat boxes and sustainable urban drainage systems. Further information on “Biodiversity by Design” can be obtained from the TCPA website: <http://www.tcpa.org.uk/pages/biodiversity-by-design.html>

Question 60

We consider that Policy 17 in the Core Strategy offers sufficient protection for nationally and locally designated sites. However the protection of these sites would be assisted by local ecological networks, wildlife corridors and stepping stones that connect them. The LAPP should identify these areas and include policy wording which promotes the preservation, restoration and recreation of priority habitats, ecological networks and priority species populations.

We consider that the LAPP should provide a specific policy on ancient woodland and veteran trees so that it follows the advice set out in paragraph 118 of the NPPF. Where a plan area contains irreplaceable habitats, such as ancient woodland and veteran trees, there should be appropriate policies to ensure their protection. Natural England and the Forestry Commission have produced [standing advice](#) on ancient woodland and veteran trees.

With regard to the question on off-setting the plan should reflect paragraph 118 of the NPPF. We suggest that a development management policy should set out criteria to firstly avoid, then mitigate and, as a last resort compensate for adverse impacts on biodiversity

Safeguarded Recreational Facilities

Question 64

These areas could be included within the wider green infrastructure network

Air Pollution

Question 67

We suggest that the plan should address the impacts of air quality on the natural environment. In particular it should address the traffic impacts of new development on European sites and SSSIs. New agricultural development (e.g. intensive pig and poultry) may also pose a risk to air quality

Light Pollution

Question 68

Light pollution has negative impacts on local amenity, intrinsically dark landscapes and nature conservation (especially bats and invertebrates). Policies (usually design policies) should address impacts on the natural environment.

2. Draft Sustainability Appraisal Scoping Report

Natural England generally welcomes the scoping report and has comments on the following sections:

Plans, policies and programmes

Natural England generally welcomes the range of plans, policies and programmes included in Appendix 1 of the Scoping Report. We suggest however that you may consider including reference to the National Character Areas (NCAs) which divide England into 159 distinct natural areas. Each is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. Their boundaries follow natural lines in the landscape rather than administrative boundaries, making them a good decision making framework for the natural environment (see comments above).

SA Framework

Natural England generally welcomes the SA Framework and considers that it covers our interests in the natural environment. We particularly welcome the sustainability objectives 6: Biodiversity & Green Infrastructure, 7: Landscape and 8: Natural Resources & Flooding. We also welcome the link made within the Health section between health and the provision of recreational open space and suggest this could be broadened to include GI provision.

3. Draft Rushcliffe Green Belt Review (Part 2b)

Although we recognise that the green belt designation is not made for the purpose of natural environment protection as such, we would nevertheless suggest that there is potential for it to deliver more positive benefits for the natural environment and people's enjoyment of it and to play a role in climate change adaptation. We would therefore like the study to consider any opportunities that could be taken for the green belt to link into green infrastructure and ecological networks both within the urban areas and with the open countryside and that wherever possible that the land should be used for positive purposes.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Roslyn Deeming on 0300 060 1524. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Roslyn Deeming
Lead Adviser
Sustainable Development Team
East Midlands Area