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Your ref: Warrington Local Plan Review - Regulation 18 Consultation



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Dear Sir/Madam

Warrington Local Plan Review - Regulation 18 Consultation

Thank you for your consultation on the above application, which was received by Natural England on 24th October 2016.

Local Plan Review

Planning policies should take a strategic approach to the conservation, enhancement and restoration of geodiversity, and promote opportunities for the incorporation of geodiversity interest as part of development.

Local authorities should ensure that appropriate weight is attached to the geodiversity interest of designated sites as well as geodiversity interests within the wider environment, and maximise opportunities to include geodiversity in and around developments as part of the design process. Further information on geodiversity is available on Natural England's website.

Warrington's natural assets need to be protected, conserved and enhanced and that this

should be a key issue in the Local Plan review. Natural England would expect biodiversity and geodiversity, soils, priority habitats, ecological networks, protected species to be covered under the heading of the natural environment. Please see the appendix below for further information on these topics.

Sustainability Appraisal Scoping

Natural England welcome the inclusion of Sustainability Appraisal (SA) Objective *Protect and enhance biodiversity and geodiversity* but suggests it is broadened to include maintain habitats and biodiversity, as the plan should continue to strengthen their conservation and encourage their enhancement in new development. The potential negative impacts of increased access on sensitive habitats, including designated sites, should be recognised. The pressures of increased access associated with development should be recognised and mitigation recommendations identified.

In accordance with the Environment White Paper *The Natural Choice – making space for nature*, the Biodiversity 2020 strategy and the NPPF, objectives should go beyond safeguarding biodiversity. The SA should ensure that policies within the merging plan conserve and enhance the natural environment to ensure there is a net gain in biodiversity. Merely safeguarding biodiversity would not achieve this national objective.

The SA should reflect the importance of geodiversity as well as biodiversity to ensure that appropriate weight is attached to the geodiversity interest of designated sites as well as geodiversity interests within the wider. Further information on geodiversity is available on Natural England's website.

The objectives should ensure the sustainable use of natural resources, including soils and geodiversity. Soils form the thin layer of our geodiversity, linking the underlying geology with the land surface and atmosphere. Therefore it is important to make the link between geodiversity, biodiversity and soil resources. Further guidance on soils, including links to important publications such as 'Safeguarding our soils: A strategy for England' (Defra, 2009) can be found on Natural England website. Important soil resources should be protected (e.g. best and most versatile (BMV) agricultural land) and appropriate management and handling of soils during the development process is essential. 'Safeguarding our soils' provides a clear vision in relation to development and soils – we should 'prevent further degradation of our soils, enhance, restore and ensure their resilience, and improve our understanding of the threats to soil and best practice in responding to them.'

There needs to be recognition of the requirements of the NPPF, including the need to protect and enhance biodiversity, including designated sites, landscape and open space, water quality, air quality and to address climate change. The NPPF also includes requirements to protect and enhance public access and best and most versatile soils.

Monitoring and Indicators

As set out in [Planning Practice Guidance](#), you should be monitoring the significant environmental effects of implementing the plan. This should include indicators for monitoring the effects of the plan on biodiversity (NPPF para 117).

Whilst it is not Natural England's role to prescribe what indicators should be adopted, the following indicators may be appropriate.

Biodiversity:

- Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance.
- Percentage of major developments generating overall biodiversity enhancement.
- Hectares of biodiversity habitat delivered through strategic site allocations.

Landscape:

- Amount of new development in AONB/National Park/Heritage Coast with commentary on likely impact.

Green infrastructure:

- Percentage of the city's population having access to a natural greenspace within 400 metres of their home.
- Length of greenways constructed.
- Hectares of accessible open space per 1000 population.

For any queries relating to the specific advice in this letter only please contact Kate Wheeler. 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
Lead Advisor
Cheshire, Greater Manchester, Merseyside & Lancashire Area Team

APPENDIX - Additional Information

Designated sites

The Local 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 included on the proposals map for the area so they can be clearly identified in the context of proposed development allocations and policies for development. Designated sites should be protected and, where possible, enhanced.

The Local Plan should be screened under Regulation 102 of the Conservation of Habitats and Species Regulations 2010 (as amended) at an early stage so that outcomes of the assessment can inform key decision making on strategic options and development sites. It may be necessary to outline avoidance and/or mitigation measures at the plan level, including a clear direction for project level HRA work to ensure no adverse effect on the integrity of internationally designated sites. It may also be necessary for plans to provide policies for strategic or cross boundary approaches, particularly in areas where designated sites cover more than one Local Planning Authority boundary.

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 strategic policies to protect and enhance valued landscapes, as well criteria based policies to guide development, as set out in the National Planning Policy Framework (NPPF), The Local Plan's policies and proposals should be informed by National Character Areas (NCAs). These should be supplemented by a more detailed Landscape Character Assessment (LCA) of the plan area. Such assessments can assist in the selection of locations for development which involve the least harm to landscape character and guide policies on the design of development.

The Local Plan should identify relevant areas of tranquillity and provide appropriate policy protection to such areas as identified in paragraph 123 of the NPPF. Tranquillity is an important landscape attribute in certain areas e.g. within National Parks/AONBs, particularly where this is identified as a special quality. The CPRE have mapped areas of tranquillity which are available here and are a helpful source of evidence for the Local Plan and SEA/SA.

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.

The Local 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.

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.

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.

A strategic approach for green infrastructure networks should support a similar approach for ecological networks, as outlined above. 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 Local Plan or alternatively integrated into relevant other policies, for example biodiversity, green space, flood risk, climate change, reflecting the multifunctional benefits of green infrastructure.

The plan should make provision for appropriate quantity and quality of green space to meet identified local needs. Natural England's Accessible Natural Greenspace Standard (ANGSt) provides a useful indicator in assessing current level of accessible natural greenspace and planning improved provision.

Soils

These should be valued as a finite multi-functional resource which underpins 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 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. New ALC surveys may be required for sites allocated in the plan.

Climate change and flood risk

The Local Plan should consider climate change adaption and 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.

Plans 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 Local 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 Local 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.

Natural England advises that one of the main issues which should be considered in the plan and the SA/HRA are proposals which are likely to generate additional nitrogen emissions as a result of increased traffic generation, which can be damaging to the natural environment. 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.