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Our ref: 197778
Your ref: New Forest National Park Authority Local Plan



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BY EMAIL ONLY

Dear Steve

Planning consultation: Local Plan review – consultation draft

Location: New Forest National Park Authority

Thank you for your consultation on the above dated 03 October 2016 which was received by Natural England on 03 October 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.

Specific comments

Local plan

Recreation Management Strategy (RMS)

We welcome reference to the RMS throughout the Plan. We recognise the value of the work done with Natural England via the RMS and look forward to continuing to progress this strategy and to use the work to also deliver the aspirations of the Local Plan.

Paragraph 2.5

For the sake of consistency, it may be worth noting in this paragraph that the internationally designated sites are also supported by underlying national designation as Sites of Special Scientific Interest (SSSIs).

Paragraph 4.13

You may like to consider adding New Forest Ramsar site to the list of designated sites in the last bullet point for completeness.

Paragraph 5.4

For the sake of consistency, it may be worth noting in this paragraph that the internationally designated sites are also supported by underlying national designation as SSSIs.

Policy 4

Whilst we support the current wording, it would also be good to mention the 'protect, maintain and enhance' hierarchy that is already included in policy 5.

Policy 8 and paragraph 5.22

A couple of sentences in this policy and the following paragraphs (particularly paragraph 5.22) seem to contradict each other and it would be useful to discuss this with you when we next meet, to explore where this concern has derived from. As it stands we don't feel that the entire wording of policy 8 is particularly helpful.

Policy 8 states *'The Authority will work with other partners and adjoining authorities to develop green infrastructure, and to ensure the impacts of development within and outside the Park's boundary do not affect the landscape character of the Park or the internationally important nature conservation designations.'* This seems to conflict with *'providing a new Suitable Alternative Natural Greenspace (SANG) in the nationally protected landscape of the National Park as mitigation for development outside the National Park is not appropriate, and will only be considered in exceptional circumstances where very significant benefits for the landscape, biodiversity and internationally designated sites of the National Park can be clearly demonstrated.'*

Paragraph 5.22 states *'Provision of alternative natural greenspace may also be considered along with a range of other measures to mitigate the effects of development within the National Park (in combination with the large levels of development planned in adjoining authorities) on the internationally important nature conservation designations.'*

There seems to be some conflict within policy 8 and its supporting text, as SANG mitigate for impacts on internationally important nature conservation designations of the New Forest. We feel it would be worthwhile discussing the semantics of this at our upcoming meeting.

Policies 20 to 25 (potential site allocations)

We note that a number of the site allocations are in particularly close proximity to either designated nature conservation sites (international or national) or ancient woodland. These issues will need to be considered when formulating development specifications later on in the plan making process.

The allocations should enhance biodiversity, and deliver net gains where possible, in accordance with NPPF paragraphs 9 and 109. The LPA may like to consider whether it would be particularly appropriate, given the location within a National Park, to establish a biodiversity enhancement protocol, which could deliver net gain for biodiversity and enable not just allocated sites, but development more generally, to offset losses of biodiversity as a result of development. For example, Dorset run a very successful scheme and the NPA could consider establishing a similar scheme. This would aid with delivery of policy 5.

In addition this would help you align with NPPF paragraph 115 which states *'Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.'*

This paragraph of the NPPF can be interpreted in two ways, firstly this paragraph elevates the importance of county wildlife sites and biodiversity more generally in National Parks than elsewhere. Secondly, development schemes that are delivering benefits for wildlife should be given due consideration and weight when considering the planning balance of a scheme. Local policies should consider reflecting this paragraph of the NPPF.

Policy 54

Whilst we welcome this policy that in parts will encompass the work being done by the RMS, the NPA needs to be mindful of the fact that improvements to access should only be made where appropriate and when impacts on nature conservation can be avoided or adequately mitigated. Any changes made will need to be assessed under the provision of the Habitats Regulations.

Sustainability Appraisal

We welcome recognition of the landscape and biodiversity issues associated with the potential site allocations within the SA and that the allocations would need to provide mitigation for landscape and biodiversity impacts. As mentioned above, it would be helpful to refer to paragraph 109 of the NPPF when establishing specifications for the allocations.

As well as considering proximity to internationally and nationally designated sites, in some instances the sites are also close to ancient woodland.

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 Alison Appleby on 07500 913698. 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

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Dorset, Hampshire and Isle of Wight Area Team