

Matter 5 / Representations 143-157 inclusive/David Dunlop

Thursday 14 March (DAY 6) – MATTER FIVE

SOUTH RIBBLE LOCAL PLAN

Representations of The Wildlife Trust for Lancashire, Manchester & North Merseyside on Chapter G – Natural & Built Environment

Matter Five:

Chapter G – Natural & Built Environment

1. Does the plan have adequate regard to the need to protect biodiversity? Are designated sites adequately referred to?
2. Are policies G1 and G2 consistent with the NPPF?
3. Are the allocations of safeguarded sites (policy G3), Protected Open Lane (G4) and Green Corridors (G12) justified having regard to the alternatives and the availability of land for housing?"

We submit that the answer to all these questions is currently “no”.

National policy

Robust ecological networks (perhaps more accurately, ‘integrated habitat networks’, the term in use in Scotland) would provide sufficiently large areas of land (and sea) to protect key life support* systems in the face of climate change.

Protected areas form the fundamental component of England’s ecological network and have served as one of the key mechanisms for safeguarding environmental assets for many decades. However, ‘*Making Space for Nature*’¹ concludes in its report to Government in 2010 that the ecological networks needed to support functional protected areas in England are, at present, inadequate and that the current system of wildlife sites (international, national and local) “*does not comprise a coherent and resilient ecological network*”¹.

The UK Government’s White Paper² on the natural environment carried this recommendation forward.

In its summary paragraph 5, it states (with our **emphases**):

*“Past action has often taken place on too small a scale. We want to promote an ambitious, integrated approach, **creating a resilient ecological network across England**. We will move from net biodiversity loss **to net gain, by supporting healthy, well-functioning ecosystems and coherent ecological networks.**”*

This is expanded throughout the document, but perhaps most concisely in its paragraph 2.8:

*“Our 2020 mission is to halt overall biodiversity loss, support healthy well-functioning ecosystems and **establish coherent ecological networks**, with more and better places for nature for the benefit of wildlife and people.”*

This approach has been carried through into the National Planning Policy Framework (NPPF), which states that,

‘The planning system should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes...; recognising the wider benefits of ecosystem services; minimising impacts on biodiversity and providing net gains in biodiversity where possible... including by establishing coherent ecological networks that are more resilient to current and future pressures’ (paragraph 109).

Further, NPPF goes on to state (paragraph 114) that local planning authorities should:

- *“set out a strategic approach in their Local Plans, planning **positively** for the **creation, protection, enhancement and management of networks of biodiversity and green infrastructure**”; and that*

(Paragraph 117) *“To **minimise impacts on biodiversity and geodiversity, planning policies should:***

- *plan for **biodiversity at a landscape-scale across local authority boundaries;***
- ***identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;***
- ***promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan”***

Ecological networks allow species (plant, fungus and animal) and associated communities of species to move within a fragmented landscape and so prevent populations of plants and animals becoming isolated and possibly dying out. That ability to move across a landscape may become even more important as climate change takes effect and some species need to move to find suitable climate conditions.

Lancashire and South Ribble contexts

South Ribble Local Plan proposals map shows linear corridors identified as *“green corridors”* and, separately, as *“wildlife corridors”* running through the district. However, no ecological evidence is offered to support the identification, coherence and functionality of this network in these particular locations or how it should and could be used to promote the *“preservation, restoration and re-creation of ecological networks”* through the planning process. There is no indication which habitat and species assemblages, and where, that network as delineated would permit to move within and across the district and beyond, nor where and how opportunities to remedy existing fragmentation in and degradation of such a network might be effectively addressed through the planning system and outcomes monitored.

Methodologies for the identification and mapping of ecological networks already exist and some have been deployed; most notably, in the more local context, in the development of the Greater Manchester Ecological Framework⁴ and the Liverpool City Region Ecological Framework⁵.

The Lancashire Nature Partnership (set up in 2010, in response to paragraph 2.16 of the Natural Environment White Paper, and formally recognised by Defra in October 2012) has only recently secured funding from Natural England to develop a methodology for the identification of an ecological framework across administrative Lancashire. This work is being led by Lancashire County Council Environment Directorate and The Wildlife Trust for Lancashire, Manchester & North Merseyside. The approach taken by Falkirk Council in Stirlingshire⁶ is currently our preferred model as one more suited to the mixed rural, urban, coastal, lowland and upland variety of Lancashire than those for sub-regions dominated by conurbation.

We submit that, since the introduction of NPPF, progress on South Ribble Borough's Local Plan has gone forward prematurely in the absence of the identification of an evidence-based, defensible ecological network for the district and/or county that is likely to be fit for purpose within, across and beyond the district; and that, therefore, the Local Plan is unsound in this respect as it is not in conformity with NPPF's content on ecological networks nor, in this context, with the Localism Act's duty to cooperate with neighbouring authorities.

On the Proposals Map, 'wildlife corridors' are shown, with a notation different to that for 'green corridors'. There are no Local Plan policies specific to these 'wildlife corridors', their protection or enhancement. We suggest that the plan would become sound if the "wildlife corridor" network on the current proposals map (never actually identified as such, and perhaps more akin to a green infrastructure network) were withdrawn and replaced by one more objectively and defensibly devised – and suggest the adoption of the methodology to be produced by ourselves and Lancashire County Council Environment Directorate, on behalf of the Lancashire Nature Partnership, funded by Natural England and using defined and so defensible criteria.

We suggest a new policy, specific to biodiversity, in Appendix 1. This addresses the omission of a coherent ecological framework and related policy. It also addresses the absence of a policy on international, national and locally based wildlife site designations, and on priority species. A related small amendment to Policy B6 is also included. These were produced as follow up to a meeting with SRBC officers to agree common ground. We've not yet heard back from them though we anticipate doing so soon.

We are making similar objections and submissions on ecological framework identification in respect of other Local Plans within administrative Lancashire.

David Dunlop, The Wildlife Trust for Lancashire, Manchester & North Merseyside, 19th February 2013.

*To clarify, "life support" is used here in its broad biological context to cover all life, including people, rather than medically to mean artificially sustaining individual human life.

References:

1 Lawton, Prof J.H. *et al* (2010) *Making Space for Nature: a review of England's wildlife sites and ecological network*. Report to Defra

2 *The Natural Choice: securing the value of nature* (June 2011), CM 8082, Her Majesty's Government

3 Defra Policy Brief – August 2008 *IS THERE A CASE FOR MODIFYING FEATURES OF THE LANDSCAPE TO HELP SPECIES MOVE IN RESPONSE TO CLIMATE CHANGE?* (SUMMARY OF DEFRA CONTRACT CR0389)

4 Greater Manchester Ecological Framework

Report:

<http://www.bolton.gov.uk/sites/DocumentCentre/Documents/An%20Ecological%20Framework%20for%20Greater%20Manchester.pdf>

5 Liverpool City Region Ecological Framework

Report: http://www.sefton.gov.uk/pdf/PLN_User%20Guide%20FINAL.pdf

6 Darren Moseley, Mike Smith, Jordan Chetcuti, & Monica de Ioanni (June 2008) *Falkirk Integrated Habitat Networks*; Contract report to Falkirk Council, Forestry Commission Scotland, Scottish Natural Heritage, and Central Scotland Forest Trust; Ecology Division, Forest Research, Northern Research Station, Roslin, Midlothian, EH25 9SY

Report:

[http://www.forestry.gov.uk/pdf/Falkirk_IHN_Report_June2008.pdf/\\$file/Falkirk_IHN_Report_June2008.pdf](http://www.forestry.gov.uk/pdf/Falkirk_IHN_Report_June2008.pdf/$file/Falkirk_IHN_Report_June2008.pdf)

SUGGESTED NEW GENERIC BIODIVERSITY POLICY

Policy 'XY' – Biodiversity and Nature Conservation

The Council will normally expect development to protect, conserve and enhance the biodiversity of the development site, in accordance with Policy 22 of the Central Lancashire Core Strategy. In this respect proposals must:

- Protect and safeguard all sites of international, national, county and local level importance including all Ramsar, Special Protection Areas, national nature reserves, sites of special scientific interest and biological heritage sites, together with any ecological network approved by the Council;
- Protect and safeguard habitats for nationally important species.
- Have regard to the ecology of the site and the surrounding area (safeguarding existing habitats / features such as trees, hedgerows, ponds and streams, as far as is reasonably practical).
- Support the area's ecological network and provide links to that network from the site itself.

In addition to the provisions of national and European law, and the requirements of national planning policy, development must adhere to the provisions set out below:

- a) This policy applies to all presently designated wildlife sites, as shown on the Proposals Map, and to any sites or networks that may be identified in the future by appropriate agencies.
- b) Development that would directly or indirectly affect any County Biological Heritage Site, Local Nature Reserve, or Local Nature Conservation Site, will be considered only where it is necessary to meet an overriding local public need.
- c) Where there is reason to suspect that there may be protected species on or close to a proposed development site, planning applications should be accompanied by a survey assessing the presence of such species and, where appropriate, making provision for their needs.
- d) In exceptional cases where the need for development in social or economic terms is considered to significantly outweigh the impact on the natural environment appropriate and proportionate high quality mitigation measures and compensatory habitat creation will be required through planning conditions and / or obligations. The aim of such measures and habitat creation must be one of providing an overall improvement in the biodiversity value of the site, in combination (where relevant) with any other land which is the subject of compensatory measures. Where compensatory habitat is provided it should be of equal area, quality and diversity, if not higher, than what is being replaced. It will be the developer's responsibility to identify and agree an acceptable scheme, accompanied by appropriate survey information, before an application is determined.

Damage to nature conservation assets

The following definition of what constitutes damage to natural environmental assets will be used in assessing applications potentially impacting upon assets:

- i. Loss of the undeveloped open character of a part, parts, or all of the ecological network;
- ii. Reducing the width or causing direct or indirect severance of the ecological network or any part of it;
- iii. Restricting the potential for lateral movement of wildlife;

- iv. Causing the degradation of the ecological functions of an approved ecological network or any part of it;
- v. Directly or indirectly damaging or severing links between green spaces, wildlife corridors and the open countryside; and
- vi. Impeding links to ecological networks recognised by neighbouring planning authorities.