

Date: 25th May 2012
Our ref: 52543
Your ref: 2116



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By email. No hard copy to follow

Dear Mr Banks

National Planning Policy Framework - Soundness of the Woking Core Strategy.

Thank you for consulting Natural England. The National Planning Policy Framework (NPPF) raises some new challenges in respect of the natural environment; and it will take some time for the full implications of the document to become clear. The following paragraphs set out my initial thoughts on what appear to be, some of the more significant challenges in the NPPF, and a brief commentary on whether the Woking Core Strategy addresses the issues effectively.

Paras 9 and 109 of the NPPF indicate that sustainable development involves seeking (inter alia) positive improvements in the quality of the built, natural and historic environment, moving from a net loss of bio-diversity to achieving net gains for nature, thereby contributing to the Government's commitment to halt the overall decline in biodiversity. This includes establishing coherent ecological networks that are more resilient to current and future pressures.

NE comment – The challenge to achieve net gains for nature indicates an emphasis on delivering gains (on and off site) through the development process. Policy CS7 provides a reasonable basis for this. It may be helpful to reinforce the policy and reflect the NPPF ambition, through the Development Management DPD (DM DPD) and through links to Biodiversity Opportunity Areas (BOAs) and the Biodiversity Action Plan (BAP). The DM DPD may be the best means of seeking the economic, social and environmental dimensions of sustainable development, and net gains across all three; in line with Para 152 of the NPPF. The challenge of establishing ecological networks is address below.

Para 109 of the NPPF also indicates that the planning system should contribute to and enhance the natural and local environment by (inter alia) recognising the wider benefits of ecosystem services.

NE Comment – The plan is founded on a range of studies and sources that provide some insight to ecosystem services, and allocations have been assessed in this context. The plan anticipates further work with partners on matters such as Green Infrastructure and this presents an opportunity to collect and map relevant data to provide a more detailed context for planning decisions.

Para 114 of the NPPF indicates 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.

NE Comments – The plan responds to this challenge in Policy CS7 (inter alia). In order to create, protect, enhance and manage of networks of biodiversity and green infrastructure, some mapping of the networks will be necessary and this should inform the Site Allocations DPD and Development Management Policies relating to windfall and other development.

Para 156 of the NPPF indicates that local planning authorities should set out the strategic priorities for the area in the Local Plan (inter alia) to deliver climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

NE Comments – The plan seeks to respond to climate change primarily through delivering sustainable development, low or zero carbon energy and addressing issues of water and flooding. In this context, and with the evolution of a clear position on GI, the plan begins to respond to the NPPF challenge, Whilst the links between climate change and the protection and enhancement of the natural environment could be made more explicit, the issues may be elaborated and addressed through mechanisms such as Nature Improvement Areas and Local Nature Partnerships (where they are in place) or other current and evolving local partnerships.

Para 111 of the NPPF indicates that planning policies and decisions should encourage the effective use of land by re-using brownfield land, provided that it is not of high environmental value.

NE Comments – This challenge could be addressed in the DM DPD

Para 118 of the NPPF indicates that certain sites should have the same protection as European sites (eg potential Special Protection Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites and sites identified, or required, as compensatory measures for adverse effects on European sites),

NE Comment – The NPPF should be a material consideration in planning decisions, however some reference to national policy (on this matter) in the plan would be helpful.

Para 123 of the NPPF indicates that planning policies and decisions should aim (inter alia) to identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.

NE Comment – There has been some work on this by organisations such as CPRE whose mapping may be helpful. If so, it may be sufficient to protect tranquil areas by means of policies in the Development Management DPD.

I hope you find these comments helpful. If you have any queries, please do not hesitate to contact me on my mobile number.

In view of the deadline, I am not able to get 3 paper copies to you on time. My comments are brief and I hope an emailed version will be adequate. If not please let me know and I will arrange to send you the paper copies early next week.

Yours sincerely

A handwritten signature in black ink, appearing to read 'J Lister', written in a cursive style.

John Lister
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