

Date: 15th March 2021
Our ref: 340469
Your ref: Review of East Devon Local Plan 2013-2031



Mr M Dickins
Planning Policy
East Devon District Council
Blackdown House
Border Road
Heathpark Industrial Estate
Honiton
EX14 1EJ
mdickins@eastdevon.gov.uk

Hornbeam House
Crewe Business
Park
Electra Way
Crewe
Cheshire
C W1 6GJ
T 0300 060 3900

BY EMAIL ONLY

Dear Mr Dickins

Review of East Devon Local Plan 2013-2031 – Issues and Options report, Housing and Economic Land Availability Assessment and Sustainability Appraisal Scoping Report

Thank you for your consultation dated and received by Natural England on 19th January 2021.

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.

We have considered the three Local Plan Review documents – the Issues and Options report, the HELAA and the SA Scoping report - and welcome the opportunity to provide input to the process at this early stage. Natural England has the following comments to make, these are in addition to the comments made on the Duty to Cooperate consultation held in December 2020.

Issues and Options report – Jan 2021

Objectives, Scope and background

Local Plans and their reviews should be based on a relevant and up-to-date environmental evidence base. Annex A provides a list of sources of evidence which may be useful in ensuring the East Devon Local Plan is evidence based, in line with paragraph 31 of the National Planning Policy Framework (NPPF) and assist in meeting Strategic Environmental Assessment (SEA) requirements. A range of additional locally specific evidence is also likely to be needed to underpin plan preparation, such as the Green Infrastructure Strategy for Towns and the Open Space Strategy that the current Local Plan identified a need for.

Designing for health and wellbeing

Natural England would welcome the preparation of a robust and up-to-date assessment of the needs for open space, and opportunities for new provision, to support the achievement of this objective through Local Plan policy. The plan should make provision for an appropriate quality and quantity of green space to meet identified local needs, and to remedy any deficiencies, as part of wider open space provision.

The plan should recognise the value of the natural environment to health and wellbeing, including

through seeking to protect and enhance public rights of way and open access land, and by improving public access to and enjoyment of the coast. The plan could include policy to support the creation and maintenance of the current and future route of the National Trail around the coast of England.

Tackling the climate emergency

Natural England welcomes the inclusion of this section in the emerging Local Plan and, as per our earlier comments, recommends that the clear need for policies to address the impacts of climate change on the natural environment are recognised in this chapter.

If the intention is to identify suitable areas for renewable and low carbon energy developments in the Plan then it will be necessary to prepare an appropriate evidence base to support those proposals. This would include an assessment of the capacity of the natural environment (landscape and biodiversity) to accommodate renewable and low carbon energy developments and their associated infrastructure.

The Issues and Options report also recognises the need to adapt to the impacts of climate change. In addition to adapting to flooding, as identified in the report, there may also be a need to implement other adaptation measures, such as but not limited to:

- identifying appropriate policies on coastal change that work with natural coastal processes;
- recognising the role of green infrastructure in climate change adaptation;
- enabling the natural environment to adapt to climate change by identifying a local nature recovery network;
- identifying opportunities for new (or improved connectivity to existing) multi-functional green and blue infrastructure;
- requiring public spaces to be more wildlife friendly and climate resilient;
- requiring the planting of street trees in new developments, characteristic to the local area, to make a positive contribution to urban cooling; and
- requiring schemes to be designed to encourage wildlife.

These are examples of nature based solutions that act to help adapt to climate change but they also offer opportunities for environmental gains, and any habitat creation and/or enhancement as a result of the above may also deliver a measurable biodiversity net gain.

Meeting housing need

In accordance with paragraph 171 of the NPPF, the plan should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the SA and HRA, to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes. In order to identify potential impacts on designated sites the Authority is advised to use our Impact Risk Zones (available from Magic Map) in assessing their site allocation options.

Site allocation policies should seek opportunities to incorporate biodiversity within the developments.

Supporting jobs and the economy

Our comments set out in the paragraph above, relating to the selection of housing allocation sites, apply equally to the selection of site allocations for employment and economic uses.

Natural England would welcome the inclusion of text in the Plan that reflects an understanding of the value of the natural environment to the local economy and seeks to maximise the delivery of green growth while avoiding or minimising costs to the natural environment.

Site allocation policies should seek opportunities to incorporate biodiversity within the developments.

Designing beautiful and healthy spaces and buildings

The Local Plan should contain policies that require high quality design and recognise the role of the natural environment in delivering local distinctiveness and sense of place. The Government are currently consulting on revisions to the NPPF to implement policy changes in response to the Building Better Building Beautiful Commission's 'Living with Beauty' report. The proposed changes recognise the contribution that the presence of greenery makes to the beauty of a place, and the proposed changes to the NPPF include a requirement for plan policies to ensure that new streets are tree-lined.

Our outstanding natural environment

Protected Landscapes

Natural England would welcome Local Plan policies that provide protected landscapes (Areas of Outstanding Natural Beauty in this case) with the highest levels of policy protection in relation to conserving and enhancing their landscape and scenic beauty.

The plan should set out clear criteria for appropriate development within or impacting on AONBs, including the major developments test set out in footnote 55 of the NPPF for development within protected landscapes. The criteria should consider the nature, scale, location, setting and standards of design for such developments.

In addition, the Plan should take account of the character and distinctiveness of different areas; it should recognise the intrinsic character and beauty of the countryside; it should consider the appropriate protection of locally valued landscapes; and it should, where appropriate, identify and protect areas of tranquillity.

Biodiversity Net Gain

Natural England are pleased to note that the Issues and Options report acknowledges the Government's commitment to introduce mandatory Biodiversity Net Gain. It is expected that the Environment Bill, when enacted, will set out the timeline for when and how the mandatory net gain will be implemented. Natural England welcomes the proposed interim approach being developed by East Devon District Council and advises that the combined approach is likely to be more consistent with the emerging National approach. However, the Authority might like to consider the priority which each option is given, with onsite delivery of net gain being the preferred option. It might also be necessary to consider how the local tariff will operate alongside the National Biodiversity Credits scheme, if and when it is introduced.

Biodiversity net gain is a key tool to help nature's recovery and is also fundamental to health and wellbeing as well as creating attractive and sustainable places to live and work in. The National Planning Policy Framework (NPPF) highlights the role of policies and decision making in '*minimising impacts on and providing net gains for biodiversity*' (para 170).

Planning Practice Guidance describes net gain as an '*approach to development that leaves the natural environment in a measurably better state than it was beforehand*' and applies to both biodiversity net gain and wider environmental net gains. For biodiversity net gain, Defra's Biodiversity Metric 2.0, can be used to measure gains and losses to biodiversity resulting from development. We advise you to use this metric to implement development plan policies on biodiversity net gain. Any action, as a result of development, that creates or enhances habitat features can be measured using the metric and as a result count towards biodiversity net gain.

The Chartered Institute of Ecology and Environmental Management, along with partners, has developed 'good practice principles' for biodiversity net gain, which can assist plan-making authorities in gathering evidence and developing policy.

Natural England focusses our advice on embedding biodiversity net gain in development plans, since

the approach is better developed than for wider environmental gains. However your authority should consider the requirements of the NPPF (paragraph 72, 102, 118 and 170) and seek opportunities for wider environmental net gain wherever possible. This can be achieved by considering how policies and proposed allocations can contribute to wider environment enhancement, help adapt to the impacts of climate change and/or take forward elements of existing green infrastructure, open space or biodiversity strategies.

Designated Sites and HRA

Natural England advises that the Plan should include the following recommendations:

- set criteria based policies for protected biodiversity or geodiversity sites or landscape areas, distinguishing between international, national and local sites;
- make clear how specific impacts from new development (e.g. recreational disturbance from new housing and deterioration in water quality) will be addressed;
- set a strategic approach to biodiversity which embeds the principle of avoiding impacts and sets out the mitigation hierarchy for when impacts can't be avoided; and
- map designated sites so they can be clearly identified in the context of proposed development allocations and policies for development

Our comments made in the previous Duty to Cooperate consultation (Dec 2020), relating to the review of the South East Devon European Sites Mitigation Strategy; the amended Habitats Regulations; the Nutrient Management Plan for the River Axe SAC; and the air quality guidance, still apply.

Priority Habitats and Protected Species

Para. 174 of the NPPF states that Plans should '*promote the conservation, restoration and enhancement of priority habitats, ... and the protection and recovery of priority species*'.

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](#). 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 by law. Further information can be found [here](#). Sites containing watercourses, old buildings, significant hedgerows, old mines, caves, heathland, grassland, ponds, previously developed land, woodland or substantial trees (to name a few) are possible habitats for protected species.

Marine Conservation Zones

The Otter Estuary Marine Conservation Zone and the Axe Estuary Marine Conservation Zone are within the East Devon District boundary. The Local Plan review should consider the inclusion of planning policy relating to the appropriate consideration of MCZs and the need for MCZ assessments, where applicable.

Networks of Biodiversity and the Local Nature Recovery Strategy

Para. 174 of the NPPF states that Plans should '*identify, map and safeguard*' and '*promote the conservation, restoration and enhancement of ecological networks*'. This should include any proposed opportunities for habitat enhancement, restoration or creation in the local nature recovery strategy, and will require the authority to work collaboratively with the Devon Local Nature Partnership and adjoining authorities. The Plan should specify the types of development that may be suitable within each of the Nature Areas identified through the LNRS.

Green Infrastructure

A strategic approach for green infrastructure is required to ensure its protection and enhancement, as outlined in para 171 of the NPPF. Green Infrastructure should be incorporated into the plan as a strategic policy area, supported by appropriate detailed policies and proposals to ensure effective provision and delivery. Evidence of a strategic approach can be underpinned by a Green Infrastructure Strategy. We encourage the provision of green infrastructure to be included as 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.

Natural England welcomes the suggested approach of designating Local Green Spaces in the Local Plan and advises that the development of the policies and their evidence base should be consistent with paras. 99 to 101 of the NPPF which requires the designations to complement investment in sufficient homes and jobs; be demonstrably special and local in character; and requires the policies for managing development within the designated areas to be consistent with those for Green Belts.

Ecosystem Services and Natural Capital

To be consistent with para. 170 of the NPPF, the Local Plan should set out policies that demonstrate recognition of the economic and wider benefits from Devon's natural capital assets and the ecosystem services they provide. In addition, there should be a plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries (para. 171).

Natural England have prepared a [Natural Capital Atlas](#) for Devon, which maps out key properties of the environment to show how much, how good and where your natural capital assets are, and may be a useful source of data as you continue preparing evidence to support the new Local Plan.

Soil, Geology and Agricultural Land

Large areas of the East Devon District are rural in nature. Post-1998 ALC surveys have identified some of the areas of Best and Most Versatile agricultural land within East Devon and, for strategic planning purposes only, Natural England have prepared [Likelihood of Best and Most Versatile Agricultural Land strategic scale maps](#) for each of the English regions.

The Plan should recognise the economic and other benefits of the best and most versatile agricultural land and seek to safeguard its long term capability. Plan policies will make clear that areas of lower quality agricultural land should be used for development in preference to best and most versatile land.

The Local Plan, as described in para. 170 of the NPPF, should set out policies that protect and enhance sites of geological value and soils. The evidence base supporting the Local Plan should set out how impacts on soils and geological conservation have been considered. Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.

Ancient woodlands

Where a plan area contains irreplaceable habitats, such as ancient woodland, and ancient 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 ancient and veteran trees.

Coastal issues

Natural England supports the retention of a Local Plan policy which protects the character of the undeveloped coast and seeks to protect and enhance its distinctive landscape and seascape.

The Local Plan proposals map should identify the East Devon Heritage Coast, and any policies developed to guide development proposals within the defined Heritage Coast area should be consistent with para. 173 of the NPPF.

Air Quality, Water Quality, Light Pollution and Noise Pollution

Natural England supports the retention of Local Plan policies which consider the strategic impacts on water quality; water resources; air quality; noise pollution; and light pollution; and which address flood risk management.

Where specific environmental issues have the potential to impact sensitive wildlife sites, Natural England recommends the preparation of planning guidance to support the implementation of the relevant policies.

General comments on the natural environment

The Local Plan should contain a clear strategy for protecting and enhancing the natural environment, which sets out the general principle of firstly avoiding harm, then mitigating, and as a last resort compensating for adverse impacts on biodiversity.

In particular, the 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), Habitats sites (Special Areas of Conservation and Special Protection 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 Issues and Options report identifies 10 natural environment issues to be addressed in the new Local Plan, and Natural England supports the exploration of all of them. In addition, Natural England recommends that each of the other issues raised in this letter, and the previous letter, are also addressed, namely the review of the South East Devon European Sites Mitigation Strategy in light of revised housing numbers; the implementation of the Nutrient Management Plan for the River Axe SAC; and the adoption of air quality guidance to support good decision-making.

Promoting sustainable transport

Transport policies (including any proposed transport infrastructure) should take full account of impacts on the natural environment and should have a positive impact on the delivery of the plan's environmental policies.

Paragraph 11.1 of the Issues and Options report identifies the multiple benefits to promoting sustainable transport. In addition to those listed, it should be noted that another of the benefits is the improved access to nature, which also improves mental health and embeds public appreciation for and understanding of the value of nature.

Developing a strategy for the distribution of development

Natural England advises that, for whichever spatial strategy is progressed, the strategy should be appropriately justified; the sites proposed for development should be those with the least environmental or amenity value; and areas that are inappropriate for development should be safeguarded.

Housing and Economic Land Availability Assessment

We recognise that HELAAs form a critical component of the evidence base for Local Plans. In order to allocate the most appropriate sites to deliver high quality, sustainable development; environmental issues and opportunities should be considered as an integral part of the assessment process.

Natural England does not have available staff resources to provide bespoke advice on LAAs or attend meetings in connection with them. In line with the National Planning Policy Framework, we offer the following generic advice on key natural environment considerations for use in producing or revising LAAs, which we hope is of use.

1. Landscape

Avoiding harm to the character of nationally protected landscapes - National Parks, the Broads and Areas of Outstanding Natural Beauty - and locally valued landscapes.

Impacts of new housing upon landscape may be positive or negative, direct or indirect, short or long term and reversible or irreversible. Cumulative impacts may also occur as a result of the combined effects of more than one housing development.

The assessment of potential housing sites should be informed by the landscape character approach. The National Character Area (NCA) profiles will provide useful information. These update the national framework of Joint Character Areas and Countryside Character Areas that are used to inform LCAs. Further information is available at [NCAs](#)

Landscape Character Assessments (LCAs) identify the different landscape elements which give a place its unique character and can help inform the location and design of new development. Further information on LCAs is at [Landscape Character Assessment](#).

More detailed study (e.g. Landscape and Visual Impact Assessment) of the sensitivity of the landscape and capacity to accommodate change may be necessary to determine the suitability of potential housing sites, particularly those within or near protected landscapes.

2. Biodiversity

Avoiding harm to the international, national and locally designated sites of importance for biodiversity.

International sites include: Special Protection Areas (SPAs); Special Areas of Conservation (SACs) and Ramsar sites¹. National sites include biological Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs), Local sites are Local Wildlife Sites (a variety of other terms are also in use).

The potential impacts of new housing upon such sites may be positive or negative, direct or indirect and short or long term. Cumulative impacts may also occur as a result of the combined effects of more than one housing development.

Indirect impacts may be experienced several kilometres distant from new housing e.g. water pollution. The key to assessing these is to understand the potential impact pathways that may exist between the development and sensitive sites.

Impact Risk Zones (IRZs) are a GIS tool that can be used by LPAs to consider whether a proposed development (or allocation) is likely to affect a SSSI. They define zones around each SSSI which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts. Information about using this data can be found [here](#).

¹ The following wildlife sites should also be given the same protection as European sites: potential SPAs, possible SACs, listed or proposed Ramsar sites and sites identified, or required, as compensatory measures for adverse effects on European sites

The [Magic](#) website is a useful source of information on the location and qualifying features of the international and national designations. Local Environmental Records Centres should also be of assistance and often hold information on Local Wildlife Sites.

Avoiding harm to priority habitats, ecological networks and priority and/or legally protected species populations

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](#).

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.

Priority habitats can be found on the Nature on the Map website referred to above. Natural England does not hold records of priority or legally protected species but Local Records Centres may be able provide these.

It may also be necessary to undertake a basic ecological survey in order to appraise the biodiversity value of any potential development site. A Phase 1 Habitat Survey is the commonly used standard for habitat audit and provides a starting point for determining the likely presence of important species. More information is available here [Phase 1 Habitat Survey](#).

Seeking opportunities to contribute to the restoration and re-creation of habitats, the recovery of priority species populations and biodiversity enhancement

Where Nature Improvement Areas (NIAs) are identified they can provide a focal point for creating more and better-connected habitats. Where housing allocations are proposed in the environs of NIAs the potential to contribute to habitat enhancement should be considered. Further information on NIAs is available here [NIAs](#).

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. Further information through the UK BAP link above.

Seeking opportunities to enhance and create Green Infrastructure

Green infrastructure is a term used to refer 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. Green infrastructure maintains critical ecological links between town and country.

The SHLAA should consider the availability of GI and opportunities to enhance GI networks when considering sites for development.

3. Geological conservation

Avoid harm to nationally and locally designated sites of importance for geological conservation - geological SSSIs and Local Geological Sites (also known as RIGS - Regionally Important Geological Sites).

The Nature on the Map website referred to above is a useful source of information on the location and qualifying features of geological SSSIs. Local Environmental Records Centres should also be of assistance and often hold information on Local Geological Sites.

Housing development may present opportunities for the enhancement of geological sites e.g. exposure sites in road cuttings. Further information on geological conservation is available on the Natural England website here [Geodiversity](#).

Seeking opportunities to contribute to landscape restoration and enhancement.

The NCAs profiles identify potential opportunities for positive environmental change. LCAs also identify opportunities for landscape restoration and enhancement. These can help identify potential opportunities for housing developments to contribute to landscape enhancement in an area.

4. Best and Most Versatile Agricultural Land

Avoiding Best and Most Versatile Agricultural Land

Land quality varies from place to place. Information on Best and Most Versatile Agricultural land (grades 1,2 and 3 a) is available from the Agricultural Land Classification (ALC). ALC maps are available on the [MAGIC](#) website. Not all land has been surveyed in detail and more detailed field survey may be required to inform decisions about specific sites. Further information is available here [ALC](#).

5. Public rights of way and access

Seeking opportunities to enhance public rights of way and accessible natural green space.

Housing allocations should avoid adverse impacts on National Trails and networks of public rights of way and opportunities should be considered to maintain and enhance networks and to add links to existing rights of way networks including National Trails. More information is available here [National Trails](#).

Accessible natural greenspace should be provided as an integral part of development. Housing should make provision for appropriate quantity and quality of green space to meet identified local needs as outlined in paragraph 96 of the NPPF. Natural England's work on [Accessible Natural Greenspace Standard \(ANGSt\)](#) may be of use in assessing current level of accessible natural greenspace and planning improved provision.

Existing open space should not be built on unless the tests of NPPF para 97 have been met. Open space is construed in the NPPF as all open space of public value which offer important opportunities for sport and recreation and can act as a visual amenity.

Sustainability Appraisal Scoping Report

As statutory consultee under Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) we are providing advice in relation to the proper legal application of these regulations in particular, with a view to protection and enhancement of the natural environment. Natural England are also keen to contribute in a manner that sees the SEA process adds real value to the Plan development process.

Task A1 – Policy context

Natural England has not reviewed the plans listed. However, we advise that the following types of plans relating to the natural environment should be considered where applicable to your plan area;

- Green infrastructure strategies
- Biodiversity plans
- Rights of Way Improvement Plans
- Shoreline management plans
- Coastal access plans
- River basin management plans
- AONB management plans.
- Relevant landscape plans and strategies
- Emerging South West Marine Plan
- Devon Climate Emergency Plan
- Water Resource Management plans
- Emerging Environment Bill

Task A2 – Baseline information

Existing environmental evidence can be gathered from various sources including online data sources like MAGIC, Local Environmental Record Centres (LERCs) and strategies for green infrastructure, open space provision, landscape character, climate and ecosystem services and biodiversity opportunity mapping.

Biodiversity data can also be obtained from developments that were subject to Environmental Impact Assessment (EIA). This can help establish a baseline to understand what assets exist and how they may relate to wider objectives in the plan area. Cross boundary environmental opportunities can also be considered by working with neighbouring authorities, local nature partnership and the local enterprise partnership.

The relationship between environmental assets and key strategic growth areas may help to highlight potential opportunities that development could bring for the natural environment. The following may also be useful when considering biodiversity priorities in your plan area:

- What biodiversity currently exists, what is vulnerable or declining?
- How are existing assets connected, are there opportunities to fill gaps and improve connectivity?
- How does the above relate to neighbouring authority areas, can you work collaboratively to improve links between assets or take strategic approaches to address issues or opportunities?

Please see the attached annex for our advice on sources of local plan evidence on the natural environment.

Task A3 – Key sustainability issues

No comment.

Task A4 – Sustainability objectives

Biodiversity – to reduce the creation of islands of biodiversity it would be advisable to include a sub-objective which seeks to ensure current connectivity between habitats is not compromised, and that future improvements in habitat connectivity are not prejudiced.

It will also be necessary, when using the SA Framework to assess the sustainability of the plan, to consider the possible impact pathways between the features likely to be introduced by the policy being assessed and the habitats and species that may be affected, and to not just consider proximity in the appraisal.

This SA objective could include a commitment to deliver biodiversity net gain, which can then be tested as the plan develops.

Landscape – the sub-objectives should provide a more detailed enquiry into the sustainability of the plan by asking whether the plan conserves and enhances the special qualities and distinctive character of the landscape and undeveloped coast.

Land resources – the sub-objective against which the plan will be assessed should set out an intention to avoid, and not just minimise, loss of best and most versatile agricultural land.

Health and activity – this objective would be stronger if it made it clear that assessment of the sustainability of the plan with regards to health and activity would be seeking enhanced provision of recreational resources but will also look to avoid impacts on the quality and extent of existing green infrastructure assets that have a recreational function.

Task A5 – Scope of the SA

The SA Framework should include relevant indicators to monitor the potential significant environmental effects of implementing the plan. Suitable monitoring can provide a much better understanding of the impacts of development on the natural environment, raise the status of the natural environment amongst decision makers, and provide much greater accountability and transparency. The proposed indicators should relate to the effects of the plan and not wider change.

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

- 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 net biodiversity habitat delivered through strategic site allocations.
- Amount of new development in AONB/Heritage Coast with commentary on likely impact.
- Percentage of the district'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.

We would be happy to work with the Council to help ensure a suitable indicator set is developed.

For any queries relating to the specific advice in this letter only please contact Stephanie Parker-Stephenson on 07799438517 or stephanie.parker-stephenson@naturalengland.org.uk. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Stephanie Parker-Stephenson
Lead Adviser
Sustainable Development - Devon, Cornwall & Isles of Scilly

Annex A - Sources of local plan evidence on the natural environment

The following sources of evidence may be useful in ensuring local plans are evidence based, in line with paragraph 165 of the National Planning Policy Framework (NPPF) and assist in meeting Strategic Environmental Assessment (SEA) requirements. A range of additional locally specific evidence is also likely to be needed to underpin plan preparation.

General natural environmental evidence

National Character Areas (NCAs) divide England into 159 distinct natural areas. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan.

Natural England has also published downloadable natural capital maps. These are a suite of ten maps, of different aspects of natural capital, contributes to our understanding of where our natural capital is.

The Magic website will provide you with much of the **nationally held natural environment data** for your plan area in downloadable GIS format. Specific data sets are listed under the environmental topics below.

Local environmental record centres may hold a range of additional information on the natural environment, principally ecological.

The following local organizations may also hold environmental information where applicable: Local Nature Partnerships, Wildlife trusts, Areas of Outstanding Natural Beauty, and Nature Improvement Areas.

Evidence relating to the **significant environmental effects of the current local plan** should be available (in line with SEA legislation), as should suitable biodiversity evidence for any plan adopted after the NPPF came into effect (27 March 2012), usually through the current plan's Annual Monitoring Report.

Landscape

The Magic website provides data on the extent of protected landscapes (**National Parks and Areas of Outstanding Natural Beauty**).

National Park/Area of Outstanding Natural Beauty Management Plans may also be a source of useful evidence. These are usually found on these organisations' websites.

Most areas have local **landscape character assessments**. These are tools to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area.

Data on **tranquillity** is held by CPRE. They also hold mapping data on light pollution.

Biodiversity and geodiversity

The most relevant layers on Magic for you to consider are **Ancient Woodland, Local Nature Reserves, Priority Habitat Inventory, Sites of Special Scientific Interest** (including their **impact risk zones**), **Special Areas of Conservation, Special Protection Areas, and Ramsar Sites** (including, where relevant, marine designations).

You may also wish to draw on more detailed information on specific **Sites of Special Scientific Interest** and the **Conservation Objectives** and **Site Improvement Plans** for **Special Areas of Conservation** and **Special Protection Areas**.

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). Larger areas of priority habitat will usually be mapped either as **Sites of Special Scientific Interest** on the Magic website or as **Local Wildlife Sites or Local Geological Sites**. **Local wildlife site** data is usually held by local planning authorities themselves as is **local geological site** data. Local Environmental Record Centres and local wildlife and geo-conservation groups are also a source of information on Local Sites.

Natural England maintains the **Open Mosaic Habitat on Previously Developed Land Inventory** (a priority habitat dataset currently not integrated into the Priority Habitat Inventory on Magic) and is available on request from Natural England via email; NaturalEnglandGIDataManagers@naturalengland.org.uk.

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. Local Geodiversity Action Plans (LGAPS) identify agreed local action for geodiversity, a list of active LGAPs can be found at UK Geodiversity Action Plan (<http://www.ukgap.org.uk/getting-involved/lgaps.aspx>).

Some areas have identified **Biodiversity Opportunity Areas** or similar for spatially targeting biodiversity restoration work.

Protected species are those species protected under domestic or European law. Local environmental record centres are likely to hold much of the available data on such species.

APIS holds data on air pollution in particular in relation to protected nature conservation sites.

Access

The Magic website holds the following access related data: **National Trails, Public Rights of Way (on the Ordnance Survey base map), Open Access Land (the Countryside and Rights of Way Act 2000 layer), together with national and local nature reserves, country parks** and the **England Coast Path**.

Locally held data will include the **definitive Public Rights of Way**, and may include **Rights of Way Improvement Plans** where they exist, and any locally mapped **open space audits or assessments**.

Natural England's work on Accessible Natural Greenspace Standards (ANGSt) may be of use in assessing current level of accessible natural greenspace and planning improved provision.

Green infrastructure

Green infrastructure strategies may comprise or contain useful evidence sources where they exist.

Soils

A provisional Agricultural Land Classification (ALC) map is on Magic, and the GIS layer 'Likelihood of Best and Most Versatile Land' is available on request from Natural England via email; NaturalEnglandGIDataManagers@naturalengland.org.uk.

Some areas already have detailed ALC maps. The coverage of existing detailed MAFF post 1988 ALC surveys is shown on Magic. The MAFF post 1988 ALC survey reports and maps themselves are available from Natural England or from Gov.UK.

Our publication Agricultural Land Classification: protecting the best and most versatile agricultural land may also be of help.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the Magic website and also from the Land IS website, which contains more information about obtaining soil data.

Climate change

The Climate Change Adaptation Manual provides evidence to support nature conservation in a changing climate.

The National Biodiversity Climate Change Vulnerability Assessment Model provides a spatially explicit assessment of the relative vulnerability of priority habitats. The data files can be accessed here: National Biodiversity Climate Change Vulnerability Assessment data.

The LWEC Climate Change Impacts Report Cards present the latest evidence on how climate change is affecting different aspects of our environment, economy and society.

Coastal and Marine issues

The following may be of help:

- Catchment flood management plans (considers all types of inland flooding, from rivers, groundwater, surface water and tidal flooding).
- Shoreline management plans (considers flooding from the sea).
- **Any estuary or harbour management plans** that are held locally.
- River basin management plans (covers entire river systems, including river, lake, groundwater, estuarine and coastal water bodies).
- Coastal Erosion Maps.
- The Marine Management Organisation has a marine planning evidence base which supplies a range of information on marine planning.
- There may be specific **Heritage Coast** information held locally, such as a management plan.

Water Quality and Resources and Flood Risk Management

The Planning Practice Guidance provides guidance on information sources for the water environment, such as:

- Water Industry National Environment Programme
- Water Cycle Studies
- Water and Sewerage Company Drainage Strategies and business plans
- Water Resource Management Plans
- Flood and Coastal Risk Management Plans and Strategies
- Abstraction Management
- Groundwater Vulnerability maps
- Location of Source Protection Zones

- Information from Environmental Statements
- Diffuse Water Pollution Plans
- Nutrient Management Plans