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BY EMAIL ONLY

Dear SPD Consultations

Draft Green Infrastructure Supplementary Planning Document

1. Thank you for your consultation dated 1 November 2011, which we received on the same date.
2. 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.
3. Natural England congratulates the Council on the production of the consultation draft Green Infrastructure Plan and Draft Supplementary Planning Document (SPD). We are pleased that it has embraced the comments in our response to the initial consultation and reflects much of the practice advice in Natural England's Green Infrastructure Guidance (2009).

Strategic objectives

4. The objectives are supported and relate well to the main economic, social and environmental drivers for green infrastructure.
5. We would have preferred to see some direct reference to landscape and landscape character within the objectives as this is clearly amongst the functions and values of green infrastructure. Although we accept that this is covered to some degree by the reference to attractiveness under Objective 1.
6. The inclusion of nature reserves under Objective 2 is welcome but this might be broadened to include reference to a wider range of accessible natural greenspaces in view of their overall contribution to community and individual health and wellbeing.

Policy GI/1 Delivery of green infrastructure

7. The recent Natural Environment White Paper (June 2011) places a strong emphasis upon a healthy functioning natural environment and the "ecosystem services" that are vital for our wellbeing and security and also sustain biodiversity. In recognition of this the Council may wish to consider underlining this theme within the document.
8. For example, consideration might be afforded extending part a of Policy GI/1 to read "*Habitat restoration and creation to reduce habitat fragmentation and restore and maintain a functional natural environment*".

Policy GI/2 Priority catchment areas

9. At a time when there is particularly intense competition for resources we appreciate the rationale behind developing a priority list on the basis of carefully considered indicators - at the same time as allowing flexibility when there are special circumstances that justify expenditure in a non priority catchment.

10. We note that the intention to review the priority list annually to reflect updated information and green infrastructure delivery. We believe this is wise as green infrastructure planning is a developing field and new evidence and tools continue to emerge. For example, Natural England is currently producing an updated series of National Character Area profiles that may be of assistance in future.

Policy GI/3 Biodiversity

11. The Natural Environment White Paper (June 2011) has also led to the establishment of the Nature Improvement Areas (NIAs) Programme. The NIAs will have much in common with Strategic Nature Areas and will comprise places where opportunities to deliver ecological networks, both in terms of large area and scale and valuable benefits to wildlife and people, are particularly high.

12. It is possible that NIAs will be established in Mid Devon and should this be the case we recommend their incorporation as additional focus areas within the final version of the Green Infrastructure Plan or subsequent revisions depending upon timescale.

Policy GI/4 Local Nature Reserves

13. We support this policy and welcome the reference to the Natural England Accessible Natural Greenspace Standards (ANGSt). This is the standard we recommend as a long term aim for all local authorities and we are pleased that its principles have been used to inform the development of the Green Infrastructure Plan.

Policy GI/5 Allotments

14. The National Society of Allotment and Leisure Gardeners (NSALG) has produced a national allotment standard for a minimum provision of 20 standard plots of 250 square metres per 1,000 households. Consideration might be given to applying that standard to both the named villages and major new developments.

Policy GI/6 Integrating green infrastructure in major developments

15. It would be more consistent with the Core Strategy and requirements of PPS9 if part (i) a of the policy were to read "*biodiversity enhancement and mitigation where warranted, resulting in ~~no net loss~~ a net gain in biodiversity.*"

16. We note the policy does not stipulate an amount of green infrastructure to be provided and we accept that each development situation is different. None the less, consideration might be afforded to the adoption of minimum standards in relation to certain types of provision. For example, part e of the policy might reference ANGSt standards.

17. We would appreciate clarification as to why off-site provision made in lieu of requirements under criterion (i) will be subsumed within the developer's standard payment of Community Infrastructure Levy. If the off-site provision is directly related to and necessary for the development to proceed our understanding is that Section 106 agreements may still be applied.

18. Paragraph 1.26 could be improved through to better reflect the requirements of PPS9 and accompanying Circular 06/05 with minor amendment "*Major applications should be accompanied by up to date habitat survey describing what flora and fauna are present on site, with particular regard to*

protected species and species of principal importance”.

Costing green infrastructure

19. We would appreciate some further explanation of the underlying working but the principle of including a detailed and specific list of green infrastructure needs - complete with cost estimates, is most welcome. That should bring clarity and certainty for developers and assist the development of the CIL charging schedule.

20. We trust the above will be of assistance. For any queries relating to this consultation you are welcome to contact me directly - email: david.westbrook@naturalengland.org.uk or telephone: 0300 060 2010. For all other consultations and correspondence, please contact the above address.

21. Thank you for your consideration.

Yours sincerely

David Westbrook
Land Use Operations