

Draft revised National Planning Policy Framework

In spring 2018, the Ministry of Housing Communities and Local Government consulted on revisions to the National Planning Policy Framework. ALERC responded to this consultation by commenting on the relevant paragraph.

Chapter 15: Conserving and enhancing the natural environment

Question 34

Do you agree with the approach to clarifying and strengthening protection for areas of particular environmental importance in the context of the 25 Year Environment Plan and national infrastructure requirements, including the level of protection for ancient woodland and aged or veteran trees?

No

Question 35

Do you have any other comments on the text of Chapter 15?

The 25 Year Environment Plan sets out how government policies, including planning policy, could improve the environment using a natural capital approach. The revised National Planning Policy undermines this by removing reference to Local Wildlife Sites and by not emphasising the need for decisions to be based on the best available evidence. To correct this, the revised NPPF should:

- Retain specific reference to Local Wildlife Sites
- Elevate Local Environmental Records Centres to the same status as Historic Environment Records

Local Wildlife Sites

Local Wildlife Sites (LWSs) are sites designated by a local partnership based on their ability to "...to ensure, in the public interest, the conservation, maintenance and enhancement of species, habitats, geological and geomorphological features of substantive nature conservation value" (Defra (2006) Local Sites – guidance on their identification, selection and management). Despite the fact that these sites are designated locally, their selection is guided by national guidance, thus ensuring that they contribute to national environment targets and policies, such as Making Space for Nature, Biodiversity 2020, and potentially A Green Future: Our 25 Year Plan to Improve the Environment.

The removal of reference to Local Wildlife Sites in the revised NPPF belies the significant part they currently play in helping England meet its commitments towards the natural environment. Without protection afforded to them through planning policy, there is a danger that many sites, and the rare habitats they preserve, will be lost. Habitat protection through the planning system would only be through the Natural Environment and Rural Communities (NERC) Act (2006) which requires publication of a list of England's priority habitats and for Local Planning Authorities to "have regard" to those habitats. Locally important habitats that do not appear on the national lists and definitions would therefore be under threat. For example, in Hertfordshire areas of chalk

grassland and heath which are smaller than the minimum size specified by the NERC Act are identified as Local Wildlife Sites because of the paucity of good quality grassland and heathland remaining in the county. Without Local Wildlife Sites being represented in the English planning system these areas of locally important habitat may be lost.

Weakened protection may also dissuade local sites partnerships from ever designating LWSs in the first place as a large motivation to do is lost. This in turn could have potentially serious knock on effects. Firstly, when sites are designated, information is provided to the landowners on how to best manage their land for the habitat that the site has been designated for. Many landowners gratefully receive and act on this information, and it is therefore a valuable mechanism by which to positively influence land managers. Secondly, with landowner permission, Local Wildlife Sites are routinely surveyed and resurveyed, providing vital monitoring evidence on the changes in site quality over time. This information is mapped and held digitally and is of crucial importance when local ecological network maps are being produced for incorporation into local plans. Local Wildlife Sites information is also an important element in the analysis of ecosystem services and the stock taking of natural capital. For example, in Devon, Devon Biodiversity Records Centre holds 30 000 hectares of information within the Local Wildlife Sites framework, which is kept up to date and made available to local authorities through the Devon Biodiversity Monitoring Framework for use in ecological network mapping and so on.

Removal of protection for Local Wildlife Sites therefore not only risks habitat loss on an individual site by site basis, it also risks degradation of an entire system that supports the natural capital approach within planning and allows for better analysis of ecosystem services. What's more, whilst this is a system that is developed and run by local partnerships, it is based on national guidance and is therefore easily intelligible by developers working in different authority areas. A further risk of losing reference to Local Wildlife Sites is that local partnerships move away from this system of designating sites in favour of their own entirely localised systems, and therefore putting many developers at a disadvantage as they are forced to adapt to very different systems in different areas.

Evidence

The revised NPPF says “[t]o protect and enhance biodiversity and geodiversity, plans should:

- a) identify and map components of local wildlife-rich habitats, ...; wildlife corridors and stepping stones that connect them; and areas identified by local partnerships for habitat restoration or creation; and
- b) promote ... ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”

Notable by its absence is any mention of the evidence required to complete this work, and how it can be accessed. The current Planning Practice Guidance makes a specific reference to Local Environmental Records Centres (LERCs) (although it calls them by the old name of Local Records Centres) as “...an effective mechanism for facilitating access to environmental information...”. This is welcome and useful, but could be taken a step further by acknowledging the role LERCs can play in facilitating the mapping of ecological networks, analysis of ecosystem services and accounting of natural capital. This could be done by elevating LERCs to the same status that Historic Environmental Records. For example where the text of the revised NPPF says “[a]s a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary” (section 16, 185) similar wording could be adapted and used to embed Local Environmental Records Centres as mandatory consultees for planners and developers, thus ensuring environmental evidence is incorporated in all plans that effect biodiversity and setting the expectation across all local authority areas.

Glossary

Question 43

Do you have any comments on the glossary?

The entry for Local Wildlife Sites (LWS) should be retained.

Local Environmental Records Centres, which should be specifically referred to in Chapter 15, should then also be included in the glossary with an appropriate entry, e.g.: Local Environmental Records Centres (LERCs) are not-for-profit organisations that collect, collate and manage information on the natural environment for a defined geographic area and facilitate access to it in support of sustainable development and public interest.