

Date: 17/09/2014

Our ref: 128390

Your ref: n/a

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South Downs National Park Authority

BY EMAIL ONLY



Customer Services
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Dear Sir/Madam,

Infrastructure Delivery Plan (IDP): South Downs National Park Authority

Thank you for your consultation on the above.

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 note that the purpose of this consultation exercise is to request infrastructure requirements from service providers. Natural England is not a service provider, nor do we have detailed knowledge of infrastructure requirements of the area concerned. However, we note that the National Planning Policy Framework Para 114. says "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." We view CIL as playing an important role in delivering such a strategic approach. As such we advise that the council gives careful consideration to how it intends to meet this aspect of the NPPF, and the role of the CIL in this. In the absence of a CIL approach to enhancing the natural environment, we would be concerned that the only enhancements to the natural environment would be ad hoc, and not deliver a strategic approach, and that as such the local plan may not be consistent with the NPPF.

Potential infrastructure requirements may include:

- Access to natural greenspace.
- Allotment provision.
- Infrastructure identified in the local Rights of Way Improvement Plan.
- Infrastructure identified by any Local Nature Partnerships or Nature Improvement Areas and or BAP projects.
- Infrastructure identified by any Green infrastructure strategies.
- Other community aspirations or other green infrastructure projects (e.g. street tree planting).
- Infrastructure identified to deliver climate change mitigation and adaptation.
- Any infrastructure requirements needed to ensure that the Local Plan is Habitats Regulation Assessment compliant.

Green Infrastructure-Natural England's ongoing input into the Park-Wide SDNP Green Infrastructure Strategy.

Natural England will be working closely with the SDNP on the Park-Wide Green Infrastructure Strategy which we fully support. We will be attending a meeting regarding this on October 13th so are unable to provide detailed comments in advance on this. However, the following has been sent to Ray Drabble of the SDNP who is leading on the GI Strategy. This is included as it is applicable to infrastructure projects and should also be considered for CIL contributions to support sustainable growth. The Infrastructure plan should be informed by the Green Infrastructure Strategy to ensure opportunities for GI are realised and captured and that the plans are compatible.

Natural England welcomes the adoption of a strategic GI approach to securing GI in the SDNP Local Plan. We have advised that we do not agree with option 2a of the Local Plan (securing GI as a piecemeal approach via individual planning applications) which will not achieve GI goals and is disjointed in nature. In order to realise a truly multifunctional GI approach an overarching strategy is required. This must be clearly mapped and secured via robust policy within the Local Plan. This can then be used to guide Land Use Planning into the future in order to avoid deleteriously impacting on the GI Network, and aid successful implementation of the local plan policies. Such a strategic scheme should be developed and secured with clear aims and objectives within the Local Plan, in order to realise the many benefits it can provide.

The SDNP provides an exceptional opportunity due to its size and location to provide an exemplar GI network on a large strategic scale, with wide- reaching benefits to wildlife and people.

Some examples of these benefits include the following:

- 1. Existing work such as the Nature Improvement Areas and the Biosphere should be included and enhanced in the GI strategy*
- 2. Protection and enhancement of statutorily protected sites (SSSIs, NNRs SACs, SPAs and Ramsar Sites);*
- 3. Linking up wildlife habitats (ancient woodland, chalk grassland, hedgerows, improving riverine habitats etc.) thus reducing fragmentation of habitats, increasing viability into the future and Increasing genetic exchange of wildlife along green corridors-using maps and evidence from the Biodiversity Records Centre to provide landscape-scale benefits*
- 4. Consideration for adaptation of wildlife with climate change;*
- 5. Providing recreational opportunities via green cycle networks etc.;*
- 6. Increasing the opportunity for people to experience wildlife (health and wellbeing benefits);*
- 7. Access to the environment for schools etc. to provide environmental education*

We fully support the provision of a GI Strategy to be incorporated into the SDNP Local Plan and Natural England views this as a key opportunity to secure great gains for wildlife and people. We look forward to working closely with the National Park as this Strategy progresses.

For any correspondence or queries relating to this consultation only, please contact Charles Routh on 07990 773630 or Rebecca Pearson on 0300 060 4090. For any new consultations or issues, please contact consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely,

Charles Routh

Lead Adviser, on behalf of Hampshire and Dorset Team, Natural England.