

# Response ID ANON-MWX6-MJEC-H

Submitted to Melton Local Plan Update: Issues and Options Consultation  
Submitted on 2024-01-02 11:31:07

## How to use the Issues and Options

### About you

What is your name?

Name:  
Roslyn Deeming

What is your organisation? (if relevant)

Organisation:  
Natural England

What is your Job Title/Role (if relevant)

Job title/role:  
Strategic Plans for Places Adviser

What is your email address?

Email:  
[REDACTED]

Are you making a submission on behalf of someone else?

No

If you are submitting on behalf of someone else, please provide details:

Name (on behalf of):

Organisation (on behalf of):

### About you (equalities questions)

Please provide the first 5 digits of your Postcode (for example LE13 1).

Enter the first 5 digits of your postcode:

Gender: How do you identify?

[REDACTED]

If self-describe, please state :

Would you describe yourself as transgender?

[REDACTED]

What is your sexual orientation?

[REDACTED]

If other, please state:

What is your age?

[REDACTED]

Do you consider yourself to have a health problem or a disability which has lasted, or is expected to last at least 12 months?

[REDACTED]

If you selected other, please state:

What is your ethnic origin?

Please describe your ethnicity and race:

What is your religion?

██████████

Please state your religion:

## Vision and objectives

Relevant context to respond to the questions below

Question 1: Looking at the options above, which option do you support?

Question 1 - Option 1: No change:

Question 1 - Option 2: Refocused and simplified version [preferred option]:

Strongly agree

Question 2: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this section

Please, provide further context:

### Vision

In the Vision Natural England would like to see stronger reference to the Nature Recovery Network which is one of the specific aims of the Environment Act 2021 and will underpin the approach to the enhancement of nature across the country. We therefore suggest the wording of the Vision could include the following addition:

"Protection and enhancement of the natural environment making connections between natural habitats to contribute to the wider Nature Recovery Network."

We would also like to see an additional point within the Vision to cover the provision of green and blue Infrastructure, for example:

"Provision of high quality accessible green infrastructure for the benefit of people and nature."

Climate Change should be strongly included within the vision and the target to reach net zero and should be integral throughout the Plan.

The section regarding the Delivery of the Plan should include Biodiversity Net Gain as one of the ways that biodiversity enhancement can be achieved and will contribute to the Natural Recovery Network.

Question 3: What do you think are the most important objectives to be covered by our Vision? Please select your top 3

Question 3 - Improving facilities for all of the community and providing the new infrastructure needed to support our growing population:

Question 3 - Addressing the causes and effects of climate change:

2

Question 3 - Ensure local housing meets the local communities current and future needs:

Question 3 - Supporting a diverse, competitive and innovative rural economy:

Question 3 - Enhancing Melton Mowbray's town centre:

Question 3 - Promoting high quality and well-designed development to help create healthy, sustainable and safe communities:

3

Question 3 - Enhancing nature and minimising harm to the natural environment:

1

Question 3 - Other (please specify below):

Please, provide further context:

Natural England would also wish to see the inclusion of a strategic objective to:

Promote good quality Green and Blue Infrastructure across the district to deliver multi-functional benefits of improving health and wellbeing, air quality, nature recovery, access to nature and resilience to and mitigation of climate change.

## Policy SS1. Presumption in favour of Sustainable Development

Policy SS1: Relevant context to respond to the questions below

Question 4: Looking at the options above, which option do you support?

Question 4 - Option 1: Delete the policy:

Question 4 - Option 2: Amend the policy [preferred option]:  
Neither agree nor disagree

Question 5: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

### Policy SS3. Sustainable Communities (unallocated sites)

Policy SS3: Relevant context to respond to the questions below

Question 6: Looking at the options above, which option do you support?

Question 6 - Option 1: Delete the policy:

Question 6 - Option 2: Review the policy to better define meeting local need:

Question 6 - Option 3: Review the policy to enhance wider sustainability [preferred option]:  
Somewhat agree

Question 7: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Natural England support bullet points 4 and 5 regarding the protection of ecological and biodiversity assets and BMV soils but suggest that this policy should also include the provision of Green Infrastructure at the earliest stages of the a development and that reference is made to the Green Infrastructure Framework.

Question 8: Under what circumstances do you think new homes in the borough's smallest and least sustainable settlements are justified?

Please, provide further context:

Question 9: Do you think criteria should be introduced to require homes built in the borough's smallest and least sustainable settlements to be built to the highest sustainability standards? If yes, what types of criteria do you think the policy should consider?

Please, provide further context:

### Policy SS4. South Melton Mowbray Sustainable Neighbourhoods

Policy SS4: Relevant context to respond to the questions below

Question 10: Looking at the options above, which option do you support?

Question 10 - Option 1: Delete the policy:

Question 10 - Option 2: Amend to reflect the 2021 Masterplan [preferred option]:  
Somewhat agree

Question 11: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Natural England acknowledges that the existing policy includes protection of wildlife corridors, designated sites and the provision of high quality green infrastructure. We suggest that it could be updated to include reference to the Green Infrastructure Framework to ensure that the proposals meet with the principles and standards set out in this.

We also advise that the requirement for Biodiversity Net Gain should be considered in relation to this development and how this can best be achieved for the benefit of both nature and people.

Air Quality does not appear to have been considered. This large allocation site is likely to result in a considerable increase in traffic generation throughout the borough and may have impacts on ecology and human health as a result of vehicle emissions.

### Policy SS5. Melton Mowbray North Sustainable Neighbourhood

Policy SS5: Relevant context to respond to the questions below

Question 12: Looking at the options above, which option do you support?

Question 12 - Option 1: Delete the policy:

Question 12 - Option 2: Amend to reflect the 2021 Masterplan [preferred option]:  
Somewhat agree

Question 13: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Natural England acknowledges that the existing policy includes protection of wildlife corridors, green links to the Country Park and the provision of high quality green infrastructure. We suggest that it could be updated to include reference to the Green Infrastructure Framework to ensure that the proposals meet with the principles and standards set out in this.

We also advise that the requirement for Biodiversity Net Gain should be considered in relation to this development and how this can best be achieved for the benefit of both nature and people.

Air Quality does not appear to have been considered. This large allocation site is likely to result in a considerable increase in traffic generation throughout the borough and may have impacts on ecology and human health as a result of vehicle emissions.

## Policy SS6. Alternative Development Strategies and Local Plan Review

Policy SS6: Relevant context to respond to the questions below

Question 14: Looking at the options above, which option do you support?

Question 14 - Option 1: Delete the policy:

Question 14 - Option 2: Reduce to locally specific criteria only [preferred option]:

Question 14 - Option 3: Additional criteria:

Question 15: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Definitions

## Policy C2. Housing Mix

Policy C2: Relevant context to respond to the questions below

Question 16: Looking at the options above, which option do you support?

Question 16 - Option 1: Delete the policy:

Question 16 - Option 2: Amend the policy [preferred option]:

Question 17: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy  
Please, provide further context

Please, provide further context:

## Policy C7. Rural Services

Policy C7: Relevant context to respond to the questions below

Question 22: Looking at the options above, which option do you support?

Question 22 - Option 1: Delete the policy:

Question 22 - Option 2: Amend the policy [preferred option]:

Question 23: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

## Policy C9. Healthy Communities

Policy C9: Relevant context to respond to the questions below

Question 26: Looking at the options above, which option do you support?

Question 26 - Option 1: Delete the policy:

Question 26 - Option 2: Revise the policy but also make health and wellbeing a key thread that runs throughout the entire plan [preferred option]:  
Strongly agree

Question 27: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Natural England suggest the following should be considered under a policy for Healthy Communities (or cross referenced to other policies):

- Cross referencing with the Green Infrastructure Framework, particularly making strong links to policies concerning Open Space and Green Infrastructure. We advise that emphasis should be included on the benefits that access to nature can bring to both physical and mental health through enabling meaningful people-nature connections.
- Green Infrastructure policy needs to ensure that health and wellbeing outcomes are being maximised for all; the policy should address unequal access to natural green space and the needs of different and intersecting user groups.
- Linkages should be made between urban areas and surrounding countryside to improve access to nature for all e.g., improved Public Rights of Way (PRoW), access by public transport and active travel routes.
- Enabling access to nature for the mental and physical health benefits by building in the green in 15 target: everyone has access to a variety of good quality green and blue spaces within fifteen minutes' walk of their home. This aligns with the GI Standard S2: Accessible Greenspace Standard and also the commitment within the Environmental Improvement Plan (EIP).

We welcome the inclusion of air quality (point h) in terms of human health however we advise that the Plan should include the consideration of air quality, water quality or soil protection in a separate policy.

Question 28: Do you think the Local Plan should require Health Impact Assessments for large scale developments?

Not Answered

Question 29: If you answered 'yes' to question 28, what size and types of development do you think should require them and why?

Please, provide further context:

## Policy EC1. Employment Growth in Melton Mowbray

Policy EC1: Relevant context to respond to the questions below

Question 30: Looking at the options above, which option do you support?

Question 30 - Option 1: Delete the policy:

Question 30 - Option 2: Amendments to reflect Use Class Order, new evidence and National Planning Policy Framework:

Question 30 - Option 3: Create separate policies for employment allocations and employment development in Melton Mowbray:

Question 31: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Question 32: Unless submitted already as part of the Employment-only Call for Sites (June-July 2023), is there any employment site you want us to consider as a potential allocation? If there is, please submit the details, including a location plan showing the boundaries to [planningpolicy@melton.gov.uk](mailto:planningpolicy@melton.gov.uk) and add a note in this section

Please, provide further context:

Definitions

## Policy EC2. Employment Growth in the Rural Area (Outside Melton Mowbray)

Policy EC2: Relevant context to respond to the questions below

Question 33: Looking at the options above, which option do you support?

Question 33 - Option 1: Delete the policy:

Question 33 - Option 2: Policy Wording Amendments [preferred option]:

Question 34: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

## Policy EC5. Melton Mowbray Town Centre

Policy EC5: Relevant context to respond to the questions below

Question 41: Looking at the options above, which option do you support?

Question 41 - Option 1: Delete the policy:

Question 41 - Option 2: Update and incorporate elements of the Town Centre Vision [preferred option]:  
Somewhat agree

Question 42: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Natural England suggests that opportunities to provide green infrastructure within Melton town centre should be considered including street trees, green roofs and walls, and linking green spaces. These measures can help with climate change adaptation and mitigation for example they can intercept rainwater and regulate storm water run-off, clean air through trapping particulate air pollution, sequester carbon and provide valuable community spaces.

Definitions

## Policy EC8. Sustainable Tourism

Policy EC8: Relevant context to respond to the questions below

Question 47: Looking at the options above, which option do you support?

Question 47 - Option 1: Delete the policy:

Question 47 - Option 2: Clarify the policy to focus on socio-economic benefits:

Question 47 - Option 3: Amend the Policy to define sustainable tourism:  
Somewhat agree

Question 48: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Natural England would welcome the aim "support for biodiversity enhancement and access to nature."

Definitions

## Policy EN2. Biodiversity and Geodiversity

Policy EN2: Relevant context to respond to the questions below

Question 49: Looking at the options above, which option do you support?

Question 49 - Option 1: Delete the policy:

Question 49 - Option 2: Amend the policy:

Question 49 - Option 3: Split the policy:  
Strongly agree

Question 50: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Natural England agrees that the current policy does need amending and updating to more clearly reflect recent government advice and changes. It may be clearer to split the policy as is suggested in Option 3. Whatever method is chosen we would wish to ensure the following is included:

For Biodiversity Net Gain - The target of 10% net gain is the “minimum” target as set out in the Environment Act 2021. The Plan policy may set out the percentage biodiversity net gain target that will apply across the plan area. Whilst the minimum should be 10% it could be higher. Any target should be achievable and evidence based. Evidence should justify the percentage net gain proposed and demonstrate that development is deliverable at this level.

The plan’s approach to biodiversity net gain should comply with the mitigation hierarchy, as outlined in paragraph 180 of the NPPF (and other relevant guidance as it becomes available). The policy should make it clear that any mitigation and/or compensation requirements for “Habitats Sites”, other statutory designated sites or irreplaceable habitats should be dealt with separately from biodiversity net gain provision. Policies and decisions should first consider options to avoid adverse impacts on biodiversity from occurring. Where avoidance is not possible, impacts should be mitigated and finally, if there is no alternative, compensation provided for any remaining impacts. Biodiversity net gain should be additional to any habitat creation/enhancement required to mitigate or compensate for impacts. It is also important to note that biodiversity net gain should be applied to all habitat features within proposed development and can be delivered even if there are no losses or impacts from development. The policy should set out the approach to on-site and off-site delivery across the plan area and for specific site allocations. On-site net gain provision should be considered before delivery off-site where this would deliver the most appropriate outcome for biodiversity. On site provision can also help to provide gains close to where a loss may have taken place and can increase access to nature for local communities and ideally based on where they can best contribute to the Nature Recovery Network.

We advise that the policy should provide an explanation of the Local Nature Recovery Strategy (LNRS) for Leicestershire & Rutland as it develops. The Nature Recovery Network is a major commitment in the UK Government’s 25-Year Environment Plan and intends to improve, expand and connect habitats to address wildlife decline and provide wider environmental benefits for people. LNRS will be required under the Environment Act and will inform future Local Plans. Statutory guidance on alignment between Local Plans and LNRS is anticipated as part of the Governments work on planning reform.

In advance of the preparation of Local Nature Recovery Strategies (LNRS) we advise that plans consider opportunities for nature recovery in line with the NPPF (see para 179 (a) & (b) and supporting PPG. The plan could identify areas for habitat management, enhancement, restoration or creation (e.g. areas proposed in biodiversity strategies, opportunity mapping or to support and strengthen ecological networks) and set out how development could contribute to nature recovery and areas to be safeguarded.

Although the protection of natural resources has been mentioned in other contexts throughout the Plan we consider that there should be a policy which considers the protection of air and water quality, and soil protection including the use of Best & Most Versatile Land (BMV).

## Definitions

### Policy EN3. The Melton Green Infrastructure Network

Policy EN3: Relevant context to respond to the questions below

Question 51: Looking at the options above, which option do you support?

Question 51 - Option 1: Delete the policy:

Question 51 - Option 2: Amend the policy [preferred option]:  
Strongly agree

Question 52: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Natural England agrees that the Local Plan should be informed by the Green Infrastructure Framework: Principles & Standards (GIF). The GIF provides a useful resource for local authorities in the formulation of their local plan policies. Ideally the Standards and Targets set out in the GIF should be used in developing and writing policy. The five Headline Green Infrastructure Standards are:

- S1: Green Infrastructure Strategy Standard
- S2: Accessible Greenspace Standard
- S3: Urban Nature Recovery Standard
- S4: Urban Greening Factor Standard
- S5: Urban Tree Canopy Cover Standard

These standards can provide the output measures so that developers have certainty over what green infrastructure is needed on site. They can be included as site specific and area-based requirements in site allocation policies. To help the GI standards to be delivered local authorities should set green infrastructure targets. These should include delivery levels over time. For instance the % of people having good quality publicly accessible greenspaces within 15 minutes’ walk from home by 2030.

The GIF includes the Natural England Green Infrastructure Planning and Design Guide which provides comprehensive details of what good green infrastructure design looks like and identifies how green infrastructure can contribute to the National Design Guide’s ten characteristics of well-designed places.

The GIF also includes "Process Journeys" for local authorities which provides further guidance in developing GI policies.

## Policy EN5. Local Green Spaces

Policy EN5: Relevant context to respond to the questions below

Question 53: Looking at the options above, which option do you support?

Question 53 - Option 1: Delete the policy:

Question 53 - Option 2: Incorporate Green Belt criteria:  
Somewhat agree

Question 53 - Option 3: Designate additional Local Green Spaces:  
Somewhat agree

Question 54: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Natural England agrees that Local Plans should designate and have policies to protect areas as Local Green Space that are important to communities. Local Green Space designations will need to meet NPPF criteria.

Question 55: If you wish to propose a new area for Local Green Space, please send a map and supporting information to [planningpolicy@melton.gov.uk](mailto:planningpolicy@melton.gov.uk) and add a note in this section

Please, provide further context:

## Policy EN7. Open Space, Sport and Recreation

Policy EN7: Relevant context to respond to the questions below

Question 56: Looking at the options above, which option do you support?

Question 56 - Option 1: Delete the policy:

Question 56 - Option 2: Update the policy, particularly the standards [preferred option]:  
Somewhat agree

Question 57: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Natural England suggest that there should be a cross reference to the Green Infrastructure policy as Open Spaces form part of the GI network. In addition we would recommend that the new Accessible Green Space Standard, set out in Natural England's Green Infrastructure Framework, is referred to in this policy or the accompanying text.

## Policy EN8. Climate Change

Policy EN8: Relevant context to respond to the questions below

Question 58: Looking at the options above, which option do you support?

Question 58 - Option 1: Delete the policy:

Question 58 - Option 2: Delete the policy, and make climate change a 'core thread' that runs throughout the entire plan:

Question 58 - Option 3: Retain but update policy EN8 and make climate change a core thread that runs throughout the entire plan [preferred option]:  
Strongly agree

Question 59: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Natural England agrees that Climate Change should be a Core thread that runs throughout the Plan. We recommend that the Plan should include positive policies to address climate change mitigation and adaptation which recognise that biodiversity loss and climate change are interlinked. We support the preferred option that the Climate Change policies should include policy guidance on "Nature-Based Solutions" which can play an important



role in aiding climate change adaptation. Nature based solutions are measures such as green roofs and walls, street trees, SuDS, and the planting of wetlands and woodlands. This approach also includes the creation of a better linked habitat network by conserving, creating, or enlarging existing habitats which will build up resilience to climate change at a landscape scale. The policy should recognise the role of GI in climate change mitigation and adaptation.

The policy should also set out how development (and associated provision for onsite nature enhancement /landscaping etc.) will be climate resilient and address climate impacts upon protected sites, species and habitats.

The policy should encourage sustainable drainage and water sensitive design to manage water on site as part of climate change adaptation. Also renewable or low carbon energy developments should recognise the potential impacts on the natural environment.

## Policy EN9. Ensuring Energy Efficiency and Low Carbon Development

Policy EN9: Relevant context to respond to the questions below

Question 60: Looking at the options above, which option do you support?

Question 60 - Option 1: Delete the policy:

Question 60 - Option 2: Refocus the policy and split it into new more specific policies as required [Preferred approach]:  
Somewhat agree

Question 60 - Option 3: Make the policy more robust and specific, to ensure all new development meets the highest standards:

Question 61: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Natural England would support greater content within the Plan regarding water efficiency and suggest the policy should encourage sustainable drainage and water sensitive design to manage water on site as part of climate change adaptation.

## Policy EN10. Energy Generation from Renewable and Low Carbon Sources

Policy EN10: Relevant context to respond to the questions below

Question 62: Looking at the options above, which option do you support?

Question 62 - Option 1: Delete the policy:

Question 62 - Option 2: Review the policy to ensure it works well for all types of renewable energy schemes [preferred approach]:  
Strongly agree

Question 63: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Natural England advise that a revised policy should continue to include protection of local landscapes, designated nature conservation sites, irreplaceable habitats, species, high quality agricultural land, water and other natural resources.

## Policy EN11. Minimising the Risk of Flooding

Policy EN11: Relevant context to respond to the questions below

Question 64: Looking at the options above, which option do you support?

Question 64 - Option 1: Delete the policy:

Question 64 - Option 2: Add new elements of national policy:  
Somewhat agree

Question 64 - Option 3: Restrict policy to strategic overview and local matters:

Question 65: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Definitions

## Policy EN12. Sustainable Drainage Systems

Policy EN12: Relevant context to respond to the questions below

Question 66: Looking at the options above, which option do you support?

Question 66 - Option 1: Delete the policy:

Question 66 - Option 2: Incorporate additional requirements:  
Somewhat agree

Question 67: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Natural England notes that the existing policy references biodiversity net gain and green infrastructure which is welcome. We suggest that these aspects should be considered at an early design stage to incorporate multiple benefits and climate change adaptation. We have mentioned in our comments on Climate Change that the policy should encourage sustainable drainage and water sensitive design to manage water on site as part of climate change adaptation and so there could be a cross reference to this. We note that the emphasis on the need for SUDs focusses on flood management and we advise that it should also reference protecting water quality. We suggest that the CIRIA SuDS Manual could be referenced.

## Policy IN1. Melton Mowbray Transport Strategy

Policy IN1: Relevant context to respond to the questions below

Question 68: Looking at the options above, which option do you support?

Question 68 - Option 1: Delete the policy:

Question 68 - Option 2: Reflect the latest position in the policy [preferred option]:

Question 69: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Definitions

## Policy IN2. Transport, Accessibility and Parking

Policy IN2: Relevant context to respond to the questions below

Question 70: Looking at the options above, which option do you support?

Question 70 - Option 1: Delete the policy:

Question 70 - Option 2: Amend policy wording to align with national and local guidance [preferred option]:  
Somewhat agree

Question 71: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Natural England agrees that it would be positive step to include elements of the Climate Change policy (EN9) including the encouragement of cycling and walking. We also suggest that there is a strong link to Green Infrastructure, for example cycle and pedestrian routes could incorporate verges or boundaries of natural habitat and street trees to connect to other habitats and green spaces. This can be a great opportunity to not only improve ecological connections, but improve air and water quality, people-nature connections, health and wellbeing. Trees, SuDS, hedges, landscaping management can all be implemented to improve GI corridors on linear routes (see GI Planning & Design Guide, section 6.13).

There is also opportunity to ensure public transport and active travel routes are enabling communities to access nature on their doorstep.

## Policy IN4. Broadband

Policy IN4: Relevant context to respond to the questions below

Question 72: Looking at the options above, which option do you support?

Question 72 - Option 1: Delete the policy:

Question 72 - Option 2: Amend policy [preferred option]:

Question 73: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Definitions

## Policy D1. Raising the Standard of Design

Policy D1: Relevant context to respond to the questions below

Question 74: Looking at the options above, which option do you support?

Question 74 - Option 1: Delete the policy:

Question 74 - Option 2: Review and strengthen policy so it sets out strategic principles for high quality new development [preferred option]:  
Strongly agree

Question 75: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Natural England recommends that reference should be made within this policy of the Natural England Green Infrastructure Planning and Design Guide 2023. This Guide provides details of what good GI design looks like linked to the ten characteristics of well-designed places as set out in the National Model Design Code - GOV.UK ([www.gov.uk](http://www.gov.uk)) and the National design guide - GOV.UK ([www.gov.uk](http://www.gov.uk)). It provides evidence based practical guidance on how to plan and design good green infrastructure and can be used to help planners and designers develop local design guides and codes with multifunctional green infrastructure at the heart. This will help to inspire the creation of healthier, nature-rich, climate resilient and thriving places to live, learn, work and play.

Question 76: Do you think the current design policy criteria covers all design issues adequately, that the current policy works well? Would you like to suggest any criteria to be added or removed from the policy?

Please, provide further context:

The policy on Design could be cross referenced to the Green Infrastructure policy to ensure that the provision of Green Infrastructure is fully integrated into new designs for development. You may want to consider applying the National GI Standards locally to set GI policies and in local design codes.

Question 77: How important do you think each of the following design considerations are for a new development?

Question 77 - Attractiveness: creating a pleasant environment to live and work:  
Very important

Question 77 - Sensitive to context: responds well to its surroundings:  
Very important

Question 77 - Distinctiveness: builds upon the unique characteristics of its surroundings and creates a sense of place in itself (design features such as scale, massing, materials, landscaping and architectural detailing).:  
Very important

Question 77 - Neighbour amenity: does not adversely affect neighbours and nearby uses:  
Quite important

Question 77 - Legible places: places that are easily understood by their users, particularly when moving around.:  
Quite important

Question 77 - Connectedness: created new and weaves into existing networks:  
Very important

Question 77 - Comprehensive: ensuring development is designed and delivered in a coordinated way, and avoiding piecemeal schemes:  
Quite important

Question 77 - Safe and attractive streets and spaces: create spaces and environment that feels safe and secure to be in.:  
Quite important

Question 77 - Environmental sustainability and adapting to climate change:  
Very important

Question 77 - Mix of uses: the right range of uses and densities:

Quite important

Question 77 - Protecting and enhancing heritage assets:

Quite important

Question 77 - Car parking:

Neutral

Question 77 - Community consultation: opportunities for community to get involved and help shape development proposals:

Quite important

Question 77 - Other: please state below any other key design considerations not highlighted above:

Very important

Please, provide further context:

Provision of High Quality Green Infrastructure throughout the site to enable equal access to green spaces and nature for local residents.

Question 78: Do you think there is a need for specific policy guidance about the use of design coding within the local plan?

Yes

Question 79: If you responded 'yes' to question 78, please provide reasons?

Please, provide further context:

Design codes need to be considered but not necessarily in a separate policy.

## Equalities Impact

Question 80: Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?

Not Answered

Question 81: If you responded 'yes'/'unsure' to question 80, please provide your reasons and whether there is anything that you think could be done to mitigate any impacts identified

Please, provide further context:

## Appendix A. Summary of the conclusions of the Local Plan Review

### Sustainability Appraisal Scoping Report

Please use the comment box below to provide any information you would like us to consider in relation to the Sustainability Appraisal Scoping Report

Please, provide a reference to the section and your comments:

Natural England have not reviewed all of the plans listed, however, it appears that the policy context is generally suitable. We would like to specifically draw your attention to the following information which may be relevant to:

Sections 4 and 5 covering Climate Change:

- NE, EA and FC shared vision to use nature-based solutions to tackle the climate emergency (2020)

- NE and RSPB Climate Change Adaptation Manual (2020)

- Natural England's climate change risk assessment and adaptation plan (2021)

Section 8: Health - Natural England have recently produced (January 2023) Green Infrastructure Framework: Principles & Standards that underpin the GI Framework. The principles are intended to provide a baseline for different organisations to develop stronger green infrastructure policy and delivery.

#### Baseline Information

Natural England generally agree that the data within the Summary of Current Baseline Information is factually correct, relevant, and suitable for the plan.

Generally, we agree with the key sustainability issues described within the Scoping document. However we would advise a few additional Key Sustainability Issues

#### Air Quality

We are pleased to note that Scoping Report identifies that the issue of Air Quality should be scoped in. We acknowledge air quality has been covered in terms of emissions but has not covered air quality impacts from agriculture. 88% of ammonia emissions come from agriculture; ammonia can lead to significant environmental impacts via contributing to nitrogen deposition and eutrophication. In addition the emphasis appears to be on human health and we consider that they should be greater coverage of the impact of air pollution on the natural environment.

We acknowledge that the Scoping report has recognised the importance of protecting and enhancing GI to ensure pollutant absorption is increased.

#### Climate Change

Natural England emphasises the need to promote nature-based solutions for climate change, particularly through the implementation of local plan policies. These measures include the installation of green roofs and walls in new buildings; the provision of Sustainable Urban Drainage Systems (SuDs) and wetlands; planting of street trees; habitat creation and enhancement to providing increased connectivity between fragmented areas of habitat to build up resilience to climate change and contribute to the Nature Recovery Network.

#### Appraisal Questions

Under the questions for Biodiversity we suggest that the 4th question should be expanded to reference contributing to the wider Nature Recovery Network, a major commitment in the Government's 25-year environment plan. i.e., 'Protect and enhance ecological networks and contribute to the wider Nature Recovery Network'.

Within the climate change questions we would like to see a question regarding Nature Based Solutions. For example, a question asking if the option/proposal will contribute to Nature Based Solutions to both mitigate and adapt to climate change.

#### Monitoring

As set out in Planning Practice Guidance, your authority should be monitoring the significant environmental effects of implementing the local plan. This should include indicators for monitoring the effects of the plan on biodiversity. It is important that any monitoring indicators relate to the effects of the plan itself, not wider changes.