
Fwd: NE Response 203090 Strategic Housing Land Availability Assessment + 203179 Housing Implementation Strategy 2016 Adur DC

1 message

Planning Policy <planning.policy@adur-worthing.gov.uk>
To: Jane Proctor <jane.proctor@adur-worthing.gov.uk>

6 December 2016 at 17:02

Jane,
See below/ attached re SHLAA and HIS,

Moira

----- Forwarded message -----

From: **Crewe LUP Hub (NE)** <CreweLUPHub@naturalengland.org.uk>

Date: 6 December 2016 at 11:54

Subject: NE Response 203090 Strategic Housing Land Availability Assessment + 203179 Housing Implementation Strategy 2016 Adur DC

To: "adurplanningpolicy@adur-worthing.gov.uk" <adurplanningpolicy@adur-worthing.gov.uk>

For the attention of Jane Proctor

Please find Natural England's response in relation to the above mentioned consultation attached herewith.

Regards,

Mrs Carla Wright

Natural England

Technical Services

Consultations Team

Hornbeam House

Crewe Business Park

Electra Way,

Crewe

Cheshire, CW1 6GJ

Tel: 020 8026 8328

Email: consultations@naturalengland.org.uk

www.gov.uk/natural-england

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see [here](#)

For further information on the Pre-submission Screening Service see [here](#)

Dear Sir/madam

Adur District Council has submitted the Adur Local Plan 2016 to the Secretary of State for independent examination in October. At this time supporting documentation was also submitted and can be found on the Council's website at:

<https://www.adur-worthing.gov.uk/alp-submission-2016/>

The Council has now published further evidence which supersedes CD06/4 - Housing Implementation Strategy 2016 and CD09/2 Adur Strategic Housing Land Availability Assessment (SHLAA) Update 2015.

The updated documents can be viewed at:

CD07/20 - Strategic Housing Land Availability Assessment (SHLAA) Update 2016

<https://www.adur-worthing.gov.uk/media/media,142487,en.pdf>

CD07/21 - Adur Housing Implementation Strategy 2016

<https://www.adur-worthing.gov.uk/media/media,142491,en.pdf>

The Inspector appointed to examine the Adur Local Plan has requested that any comments on these two new documents should be submitted to the Council by Thursday 22nd December 2016 at the following address:

adurplanningpolicy@adur-worthing.gov.uk

If you have any queries, please contact Jane Proctor on 01273 263244

Date: 06 December 2016
Our ref: 203179
Your ref: Housing Implementation Strategy 2016



Jane Proctor
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BN11 1HA

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BY EMAIL ONLY

Dear Jane Proctor

Adur Housing Implementation Strategy 2016

Thank you for your consultation on the above dated 01 December 2016 which was received by Natural England on 01 December 2016.

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.

Natural England does not consider that this Housing Implementation Strategy 2016 poses any likely risk or opportunity in relation to our statutory purpose, and so does not wish to comment on this consultation.

The lack of comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may wish to make comments that might help the Local Planning Authority (LPA) to fully take account of any environmental risks and opportunities relating to this document.

If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.

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.

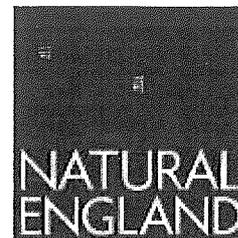
Yours sincerely

Mrs Carla Wright
Technical Services Consultations Team

Date: 06 December 2016

Our ref: 203090

Your ref: Strategic Housing Land Availability Assessment (SHLAA) Update 2016



Jane Proctor
Adur & Worthing Councils
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BY EMAIL ONLY

Dear Jane Proctor

Strategic Housing Land Availability Assessment (SHLAA) for Adur & Worthing Councils

Thank you for your consultation dated 1 December 2016, which we received on 1 December 2016.

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 recognise that SHLAAs 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 SHLAAs 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 SHLAAs, 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](#).

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 to 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

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

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 73 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 74 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.

Yours sincerely

Mrs Carla Wright
Technical Services Consultations Team