



## Huntingdonshire Local Plan Examination

### Matter 15 – Conserving and enhancing the environment

# Natural England Further Written Statement to Address the Inspector's Questions

15 June 2018

#### **Issue**

Whether the Local Plan is justified, effective and consistent with national policy in relation to the approach towards conserving and enhancing the environment.

#### **Relevant policies – LP32 – LP40**

#### **1) Taking each individually, are Policies LP32-LP48 justified, effective and consistent with national policy?**

Natural England is generally very supportive of Policies LP32 – LP48 which seek to protect and enhance the natural environment, subject to minor amendments Policy LP32, discussed below in response to Question 2, and the following minor amendment to Policy LP 33.

As indicated in our response to the Proposed Submission consultation, we believe that minor amendments to *Policy LP 33 Trees, Woodland, Hedges and Hedgerows* would improve consistency with paragraphs 109, 117 and 118 of the NPPF to protect and strengthen ecological networks. Huntingdonshire District includes numerous ancient woodlands (both Ancient and Semi Natural Woodland and Ancient Replanted Woodland) some of which are statutorily designated as SSSIs and some form part of the West Cambridgeshire Hundreds. These are highly important areas of isolated ancient woodland habitat, a national and local Priority Habitat, which requires protection and enhancement through buffering and habitat connectivity to improve their resilience – new development can, and should, play a significant role here, in accordance with paragraphs 109, 117 and 118 of the NPPF. Natural England advises that the policy include additional text to recognise the isolated remnants of the West Cambridgeshire Hundreds, within the

district, and require development to deliver net gain enhancements which extend and connect this fragmented woodland resource. Alternatively this could be included within *Policy LP 32 Biodiversity and Geodiversity*, subject to appropriate cross-referencing.

**2) Is the approach set out in Policy LP32 towards the potential effect of development on European sites appropriate and justified? Does the policy deal adequately with recreational pressure from additional housing and the need for mitigation? What is the Council's response to Natural England's concerns?**

Natural England fully supports Policy LP 32. Our advice is that minor additional policy wording is required to ensure that proposals for residential development provide appropriate and adequate mitigation to address the effects of increased recreational pressure, particularly at sensitive European designated sites. Our advice is that the following additional text is required to provide clarity to developers on the types of mitigation likely to be required to adequately address this impact and thus meet the requirements of the Habitats Regulations and paragraph 109 and 118 of the NPPF:

*Mitigation may involve providing or contributing towards the following measures:*

- *Access and visitor management measures within the designated site/s;*
- *Improvement of existing green space and recreational routes;*
- *Provision of suitable alternative natural green space and recreational routes;*
- *Monitoring the impacts of new development on designated sites to inform the necessary mitigation requirements and future refinement of any mitigation measures.*

**3) Is the requirement for an air quality assessment for large scale major development justified based on the definition set out?**

Large scale major development has the potential to contribute to a significant increase in emissions to air which can have a harmful effect on the environment including sensitive ecological sites. On this basis Natural England welcomes the requirement in *Policy LP 38 Air Quality* for relevant development to be accompanied by an Air Quality Assessment as this will ensure that potential adverse impacts on ecology will be appropriately assessed and mitigated. In our view this is required to ensure that development is sustainable and, as per paragraph 109 of the NPPF, does not adversely affect the natural environment through unacceptable levels of air pollution.

**Sarah Fraser**  
**Natural England**