

Matters related to National Planning Policy Framework (NPPF)

Natural England has considered the recently released National Planning Policy Framework (NPPF) and offers the Inspector the following advice in relation to the Core Strategy.

We do not consider that there is any fundamental conflict, in respect of matters relating to the natural environment, between the basic aims of the Core Strategy and those of the NPPF. Nevertheless the NPPF raises a number of issues where we believe that there is a need for text modification or policy review in order to properly reflect the NPPF guidance. These fall into three main categories.

- Previous guidance in PPSs often indicated that local policy was not required where it might simply repeat national policy (para 8.1 of the Core Strategy) and consequently the Core Strategy does not include policy that covers these issues. The NPPF does not take this line, rather it indicates that policy protection is needed in a number of areas where previously it was not.
- The NPPF introduces new concepts which the Core Strategy needs to take into account, in particular Nature Improvement Areas and Ecosystem Services.
- The Core Strategy includes references to PPSs which have been cancelled. In this respect Paragraph 8.1 needs complete revision.

Below we have considered the Core Strategy in relation to advice in the NPPF in relation to setting natural environment policies.

Paragraph 109 of the NPPF, the first of the section dealing with the natural environment, has five bullets. The first and third of these we have considered below in relation to other paragraphs later in this part of the NPPF. However, the reference (bullet 2) to 'recognising the wider benefits of ecosystem services' introduces a concept that is not specifically covered in the Core Strategy. Ecosystem services is a cross cutting concept relevant in a number of areas apart from biodiversity, for example flood risk, green infrastructure, groundwater protection, coastal erosion and Poole Harbour policy so it is not straightforward to introduce into the Core Strategy. Nevertheless, it would be useful to have some recognition, for example within the flood risk section, that the management of land can contribute to ameliorating flood risk, or, in the green infrastructure section, that it can play an important role in providing ecosystem services.

The NPPF (para 113) indicates that LPAs should set criteria based policies against which development proposals should be judged and these should reflect the

distinction between the international, national and locally designated sites . Policy BIO does not do this for it does not include any reference to internationally designated sites or to SSSIs. These now need to be included and appropriate policy protection given. Guidance later in the NPPF (116-118) is also relevant

In para 114 the NPPF indicates that LPAs should set out a strategic approach, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. The Core Strategy already includes such an approach through the first three bullets of Policy BIO and Map 15, which remains relevant in the light of the identification of Purbeck as a Nature Improvement Area (NIA).

The second bullet of 114 relates to the undeveloped coast, in particular Heritage Coast. There is no specific policy reference to the Heritage Coast or to the undeveloped coast in general. Whilst Policy LHH clearly gives some policy protection to Heritage Coast it falls short of complying with advice in NPPF 114. Therefore policy in relation to the Heritage Coast should be introduced.

Para 115 of the NPPF covers AONBs. In the light of the advice here, Natural England consider that the policy protection to AONBs in the Core Strategy should be strengthened. It is no longer the case that, because there is national guidance, there is no need for local policy, so appropriate modification to Policy LHH is needed..

For biodiversity and geodiversity Paragraph 117 of the NPPF indicates the matters that planning policy should address. Many of these are already covered in the Core strategy. However, the protection of recovery of priority species (Species of Principle Importance included in the England Biodiversity List) in Bullet 3 is not covered by policy BIO or by text and now should be.

Bullet 5 of para 117 indicates that LPAs should consider whether the types of development that may be appropriate in Nature Improvement Areas should be specified. This would bring the entire policy framework of the Core Strategy into consideration. We do not consider that this framework is contrary to the aims of the NIA. Rather it is generally supportive. However, it would be useful to refer to the NIA in the part of the Core Strategy (policy BIO and associated text) that covers this issue.

We also note that the NPPF at paragraph 157 (bullet 6) indicates that it may be necessary to limit the freedom to change the uses of buildings. Applications for the change of use of buildings from non residential to residential use within 5km of designated heathland would bring Policy DH into play but if there were no need for an application there is a danger that this policy and the Habitat Regulations would be breached. Thus the LPA should consider whether a restriction on such change of use is necessary to ensure conformity with this policy and the Habitat Regulations is maintained.