Newcastle-under-Lyme Borough Council Local Plan Issues and Options Consultation January 2022 Staffordshire Wildlife Trust response

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Please note, this document shows only the consultation questions that Staffordshire Wildlife Trust responded to.

Question 1

Do you agree with the Vision for the Borough? If not, how could the Vision be improved?

We would agree with the ambition to 'create more sustainable places that are resilient to future climate change, through measures such as well-designed and integrated networks of Green Infrastructure' but would like it to also include greater emphasis on addressing the nature crisis too. With 41% of species in decline and 15% facing extinction, and just 32% of Staffordshire's SSSIs in favourable condition, it is imperative that the nature crisis is seen as a priority when decisions are made about land use. The climate emergency and nature crisis are inextricably linked – they each exacerbate, and offer potential solutions to the other. In addition to creating a landscape that is resilient to climate change, the council should seek to create a Nature Recovery Network, which follows the principles of the Lawton Report:

- There must be more space given to wildlife;
- Existing wildlife spaces must be expanded;
- The quality of existing wildlife spaces should be improved by better habitat management;
- The connectivity between wildlife spaces must be enhanced.

In November 2021, the council adopted a Motion for Nature's Recovery, pledging to take action to halt and reverse nature's decline. We would like the Vision to go further and include a more explicit commitment to creating a landscape that supports the recovery of the natural world.

Question 2

Do you agree with the Strategic Objectives? If not, how could these be improved?

We believe that up-to-date ecological evidence needs to be gathered to inform the strategic objectives, particularly SOIV, SO-IX and SO-XII. All the Borough's open spaces, Green Belt areas and natural habitats need to be mapped to give an accurate _current_ picture of the state of present and potential habitat quality, as well as the availability of accessible natural greenspace. This data will enable the council to make evidence-based strategic decisions on opportunities for habitat enhancement, expansion and opportunities for wildlife corridors.

We would encourage the council, in line with UK Government's national and international commitments [in the Leaders Pledge for Nature], to set an objective to manage at least 30% of council-owned land for the benefit of wildlife by 2030.

Making more space for nature to become abundant once again will give our struggling wildlife the chance to recover and also restore beautiful wild places - places that store carbon, help to tackle the climate crisis and support improved physical and mental health.

Looking After Staffordshire's wildlife

Question 4

Which option for growth is the most appropriate to use in the Local Plan?

It is not possible to decide which options for growth is most sustainable without information on current environmental limits. It is not clear whether growth patterns are compatible with meeting environmental targets such as climate change mitigation, air pollution, water usage or nature recovery.

Question 10 Are there any alternative options which require consideration?

In order to give an informed response to this question, we would highlight the need to carry out up-to-date local ecological habitat mapping within the Borough. This would provide a strategic evidence base to determine which areas should be developed or protected.

In its motion for Nature's Recovery, the council has already committed to local habitat mapping. We believe this should be commissioned at the earliest opportunity so that it can provide an evidence base for any land use proposals in the emerging Local Plan.

The NPPF guidance states that the following should be included when identifying and mapping local ecological networks:

- the broad geological, geomorphological and bio-geographical character of the area, creating its main landscapes types;
- key natural systems and processes within the area, including fluvial and coastal;
- the location and extent of internationally, nationally and locally designated sites;
- the distribution of protected and priority habitats and species;
- areas of irreplaceable natural habitat;
- habitats where specific land management practices are required for their conservation;
- main landscape features which, due to their linear or continuous nature, act as corridors for species distribution;
- areas identified by national or local partnerships with potential for habitat enhancement or restoration, including those necessary to help biodiversity adapt to climate change
- audits of green infrastructure, such as open space within urban areas;
- biodiversity and geodiversity value of previously developed land and the opportunities for incorporating this in developments
- areas of geological value which would benefit from enhancement and management

Question 18 & Question 19

Should site AB2 -Land south east of Junction 16 be considered for Green Belt release?

Should site KL15 -Land to the south and east of new development site, Keele University be considered for Green Belt release?

Further ecological evidence base is required to determine whether sites are appropriate to be released or allocated. Without NRN mapping, accessible greenspace studies or site survey, it is not yet known how important the areas may be in terms of wildlife.

The Site Review Proforma for allocation sites only contains one criterion relating to biodiversity, and this deals only with existing designated sites: 'Does the site contain a designated AONB, SAC, RAMSAR, SPA, SSSI, Ancient Woodland, RIGS, SBI, LNR or BAS?' This relies on all sites worthy of designation having been identified, which is not the case for locally designated sites (SBIs, BASs) or ancient woodland, as unfortunately survey data is not comprehensive or up-to-date across the district. The national ancient woodland inventory is only provisional as most ancient woods under 2 hectares are yet to be identified- work is ongoing to find further ancient woods in Staffordshire. Likewise, there are many sites that could meet Local Wildlife site criteria but have not been surveyed sufficiently.

The criterion also does not consider the presence of other features listed in the NPPF as ecology baseline for plan making, such as other irreplaceable habitats (like veteran trees or peatlands), priority habitats or species, or whether the site is part of/ acts as an important wildlife corridor, stepping stone or area for ecological enhancement. Further baseline studies such as a Nature Recovery Network map, identification of enhancement areas and surveys of specific sites to identify any important features is required before informed decisions on site selection can be made.

Question 23

What should the Local Plan do to enhance the vitality & vibrancy of the Borough's retail centres?

Consideration should be given to greening urban areas with smaller-scale wildlife habitats such as green walls and roofs, street trees, rain gardens for rainwater management, wildflower areas and community growing spaces.

Question 25

Is a Local Plan policy on air pollution required? If so, what should a policy on air pollution contain?

It would be valuable to have a policy on air pollution, but also to add nature-based solutions to this and the joint air quality plan. Greening problem areas with trees and vertical green features would help filter pollution and cool the environment in problem areas, as well as screening sensitive receptors. New development could contribute to the plan and also provide air quality mitigation within individual sites.

Question 26

Is a Local Plan policy on water quality required? If so, what should a policy on water quality contain?

It would be helpful if a policy on water quality could uphold WFD targets and require new developments to deliver and monitor a minimum standard of water quality discharge, water usage and water recycling. Sustainable drainage systems, rainwater harvesting and watercourse restoration would help deliver this. However, an overall strategy to retro-fit nature based solutions and to solve current water issues is also needed, which could be funded by development contributions and other funding sources.

Question 27

Is a Local Plan policy on environmental quality required? If so, what should a policy on environmental quality contain?

Yes. This should be informed by an adequate environmental evidence base, and contain specific measurable requirements for net environmental gain.

Question 29

Do you agree that the Local Plan should set out identified areas for ecological recovery?

Yes, the Local Plan should set out identified areas for ecological recovery, using NRN mapping and engaging local statutory and non-statutory stakeholders to designate specific areas of the district.

Local biodiversity policy should also include an evidence-based strategy and action plan including short and long-term targets for putting nature into recovery by 2030. Interim reports on the progress made with regards to the above mentioned action-plan should be published, and the

strategy should complement the county's Local Nature Recovery Strategy and be embedded within the Local Plan.

Areas of focus should include:

- Biodiversity Net Gain - a commitment to a *minimum* of 10% Biodiversity Net Gain on all developments, measured using DEFRA's Biodiversity Metric 3.0 or the most up-to-date version. Potentially higher net gain % could be required for some developments or in particular areas where biodiversity is low or enhancement is needed;
- The development of a Habitat Bank and offsetting sites register database to enable developer compliance and resources to be directed towards strategically important areas for nature's recovery, in line with the requirements of the Environment Bill and national best practice guidance. Biodiversity sites should be added to the call for sites;
- Land management – for example, details on how the council will contribute to the 30% target for land managed for nature, in line with the UK Government's national commitments; complemented by an ambition to maintain up-to-date records on the condition and management of Local Wildlife Sites, SSSIs and other protected areas in the area;
- Health and wellbeing / Access to Nature – for example, how the council will improve access to nature by following the Natural England 'Nature Nearby' guidance. Particular regard should be given to: areas with high levels of physical health problems; areas with high levels of mental health problems; and areas where the amount and quality of accessible natural greenspace is below Natural England's targets.
- Education and awareness – information on how the council will support and educate businesses, communities and the wider public to take action to put nature into recovery
- Climate Change - the implementation of natural solutions to climate change, eg. restoring and enhancing habitats so they provide natural solutions to store and sequester carbon, manage flood risk, improve air and water quality and sustain vital ecosystems

Question 31

What are your perspectives on the policy approach advocated in the 2019 Strategic Flood Risk Assessment?

We support national policy in terms of sustainable drainage systems and the need to enhance and restore river corridors and habitats. These and other nature-based solutions need to be embedded within a strategy, and in policies that require new developments to avoid impacting on floodplains, and restore and enhance existing wetland systems.

Question 32

Do you agree that an open space policy should set out open space provision requirements in new development?

All homes should have access to quality green or blue space, as outlined in Natural England's Accessible Natural Greenspace Standards (see table). We would recommend that these voluntary standards are adhered to and taken into account within the development of the emerging Local Plan.

Access to greenspace is known to have a positive impact on both physical and mental health (see Natural England's *A rapid scoping review of health and wellbeing evidence for the Framework of Green Infrastructure Standards* (NEER015))

In order to address the UK nature crisis, more space must be provided for wildlife in our landscape. We need to allocate more land for nature's recovery, which could be achieved on the Greenbelt, for example, through a Wildbelt designation (see https://www.wildlifetrusts.org/sites/default/files/2020-09/Wildbelt%20briefing%20September%202020.pdf)

Accessible Nature Greenspace Standards:

Name of criterion	Size distance criteria	Rationale
Doorstep Greenspace (NEW)	At least 0.5 ha within 200 metres or under 5 mins walk*	New criterion for accessible greenspace on your doorstep. This is a more general category of ANGSt that includes a wider range of greenspace which is especially important in existing built up areas where homes don't have a garden.
Local natural Greenspace	At least 2 ha within 300 m (straight line route) or 500 m (actual walking/cycling route) i.e. within 5- 10 mins walk* or 2 mins cycle	Original criterion - especially relevant in new urban extensions and garden communities. Rationale around accessible natural greenspace important for nature recovery and health and wellbeing benefits.
Neighbourhood natural greenspace (NEW)	10 ha within 1 km or a 15-20 mins walk* (straight line – or network distance to be determined) or 4 mins cycle	Distance criteria to promote active travel to visit natural greenspace.

Wider neighbourhood	At least 20ha within 2km	Original criterion eg parks and gardens
District	100 ha within 5 km 20 mins cycle	Original criterion eg country parks, access land (Countryside and Rights of Way Act 2000), accessible woodland.
Sub-regional	500 ha within 10 km 40 mins cycle	Original criterion and includes e.g. access land, accessible woodland, and the largest nature reserves.
Local and National Nature Reserves (LNRs & NNRs)	LNRs and NNRs of at least 1 ha per 1000 population	This criterion is measured at district/borough level. The original criterion only included LNRs, however, the new criterion includes NNRs, to reflect the value that Natural England places on NNRs close to where people live. Over 1700 LNRs have been declared since 1949.

Question 33

Is a Local Plan policy on transport required? If so, what should a policy on transport contain?

Transport contributes a large proportion of greenhouse gases, as well as affecting peoples quality of life. Usable routes for walking and cycling need to be provided and maintained using evidence of need and gaps in resources. Electric vehicle charging should be provided on all new developments. Solutions such as car clubs should also be considered.

Question 34

What measures would you like to see in a Local Plan policy on renewable energy?

Renewable energy developments should also enhance local habitats and landscape, as well as consider impacts to biodiversity.

Other carbon reducing approaches could be appropriate to include in the Local Plan could include identifying and avoiding impacts to peat deposits in the borough. Developments must avoid impacts upon the catchments of existing peatlands, and contribute to restoring degraded peatlands. Increasing soil carbon and creating new carbon-sequestering habitats such as wetlands, woodlands and diverse grasslands as part of a Local Nature Recovery strategy.