

Newcastle under Lyme First Draft Local Plan 2020-2040

Staffordshire Wildlife Trust comments 14 August 2023

Summary:

Policies to support nature recovery must be fully embedded across the Local Plan, in line with the Nature Recovery Declaration adopted by Newcastle Borough Council in November 2021.

The Plan should consider setting out specific areas for habitat enhancement, to towards the UK Government target of 30% of land managed for nature by 2030, and ensure that any off-site Biodiversity Net Gain is delivered in the best places, by using nature recovery network mapping and the Local Nature Recovery Strategy.

The Plan should consider requiring a 20% net biodiversity gain in certain areas, for example green belt sites.

Proposed allocation sites should undergo further evidence base gathering before being allocated. We recommend a preliminary ecological appraisal and a high-level BNG assessment, to determine whether key ecology issues are present, and how a 10% net biodiversity gain would be achieved. The presence of priority habitats and species, and any areas worthy of Local Wildlife Site designation, may affect the suitability or delivery of sites.

We have highlighted issues at two strategic sites- AB2 near Audley and SP11 Keele Golfcourse, however many other proposed sites have potential ecology issues that could affect their capacity for development.

Nature-based solutions and wildlife-friendly green infrastructure should be more widely used to increase health and wellbeing, give better access to nature, tackle the climate crisis and manage issues such as flooding and pollution.

The Plan could consider specifying that particular developments meet the Building with Nature standards <https://www.buildingwithnature.org.uk>

Monitoring of key environmental objectives, such as biodiversity net gain, climate change targets and greenspace standards should be set out in the Plan.

Introduction

Paragraph 2.3

The paragraph states that 'The Plan will-

- Demonstrate sustainable development that helps combat climate change and carbon reduction'

We would like this sentence to be reworded so that it also takes into account the nature crisis, ie. 'This Plan will Demonstrate sustainable development that helps combat climate change and carbon reduction and supports nature's recovery.'

The nature crisis and climate crisis are inextricably linked and we can't fix one without fixing the other. The State of Nature Report, 2019, a major study of UK wildlife, revealed that 41% species are in decline and 15% facing extinction.

In November 2021 Newcastle Borough Council adopted a Nature Recovery Declaration which committed to 'Embed nature's recovery into all strategic plans and policy areas, not just those directly related to the environment. Ensure local nature recovery is well understood across the authority and complements other relevant plans and strategies.'

Policies to support nature recovery must be fully embedded across the Local Plan to halt and reverse the decline of the natural world, alongside efforts to combat climate change.

Strategic Objectives for the Borough

Following on from the Authority's approval of a Nature Recovery Declaration in November 2021, the Local Plan should incorporate nature recovery into its strategic objectives. Halting the decline of nature needs to be embedded across all areas of the Plan, in conjunction with efforts to tackle climate change. We have added our recommended text **in bold** below:

SO-I Create development with a sense of place and character, which naturally enhances human health through utilising sustainable construction methods, **climate-adapted green infrastructure, access to nature** and sustainable transport connections, where possible.

SO-II Diversify the Borough's employment base and deliver **attractive, sustainable** employment sites which will benefit economic growth for the region focusing on sectors: advanced manufacturing, distribution and logistics, supporting technology and the green economy to generate more skilled jobs for local people.

SO-III Further investment in the regeneration and renewal of the distinctive market towns of Newcastle-under-Lyme and Kidsgrove to promote attractive public spaces, improvement and enhancement of the streetscape, independent stores, great restaurants, bars and cafes, a higher mix of residential and more alternative uses which draw in visitors and create vibrant centres. To support visitors and residents



with access to healthier food choices and accessible, sustainable green spaces and active travel options to support health and wellbeing.

SO-IV Reduce the Borough's carbon footprint and mitigate the impact of climate change in the Borough ensuring local policies promote sustainability and harness opportunities for renewable energy generation, carbon sequestration, **nature-based solutions** and greener construction, where this is viable and deliverable.

SO-V Provide a mix of housing types which are attractive to people who want to live and work in the Borough and to provide aspirational housing which is well designed and adaptable.

SO-VI Support the vitality of rural villages, preserving and enhancing the special character which is valuable to each local community whilst enabling balanced growth to improve affordability and to provide choice in housing types for local people.

SO-VII Support active and sustainable travel across the Borough. Raise the profile of Kidsgrove Railway Station and improve the connectivity to Kidsgrove town centre as a significant sustainable transport hub in the Borough.

SO-VIII Provide a clear local strategic planning framework to support the development of Neighbourhood Plans which will set out the more detailed policies to guide development in the Borough.

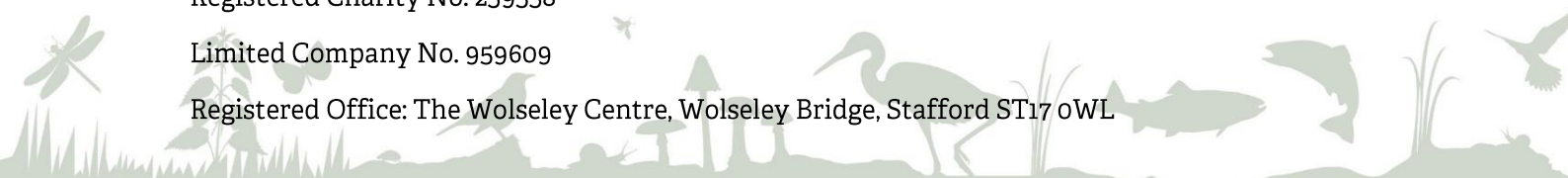
SO-IX Support activity, including sport and recreation. Maintain the vast majority of the wide variety of open spaces in urban areas and improve green corridor linkages, one of the Borough's greatest unique assets to help enhance health and wellbeing.

SO-X Enable the growth of Keele University to support its vision for increasing student numbers and expanding its capacity for research and development; supporting its role as a centre for innovation and as an economic asset for North Staffordshire, whilst preserving and enhancing the character of the surrounding area.

SO-XI Deliver targeted development seeking a balance between growth and conservation to ensure that the Borough retains its identity as both an urban and rural Borough which provides the ideal setting for people wanting to enjoy countryside, village and town life in the West Midlands.

SO-XII Protect the Green Belt, except where exceptional circumstances **and robust evidence** justify strategic Green Belt release to meet strategic needs identified by the Plan.

SO-XIII Support nature's recovery across the Borough, by protecting and enhancing existing important habitats and species and creating new habitat links to work towards the UK Government target of 30% of land managed for nature by 2030, and ensuring that any funds resulting from offsite Biodiversity



Net Gain are delivered in the optimum locations for nature recovery, in alignment with local habitat mapping and the Local Nature Recovery Strategy.

5 Approach to Policies

Paragraph 5.3

In terms of policy areas that require further detail and development and what the Plan should contain at the next stage, we feel that biodiversity evidence and policy detail could be expanded to ensure that key objectives are delivered.

The plan should consider requiring a 20% biodiversity net gain in key areas where viability is unlikely to be affected, and where enhancements are most needed. This could cover the green belt, or distinct areas such as key habitat corridors, or areas in need of landscape restoration.

The plan could be accompanied by a specific Biodiversity Supplementary Planning Document setting out specific policy and targets for biodiversity in the borough.

Proposed allocation sites should undergo Phase 2 evidence base gathering to include a preliminary ecological appraisal and a high-level BNG assessment, to determine whether any further ecology issues are present, such as areas worthy of Local Wildlife Site designation, to ensure sites are viable.

The Plan should consider allocating some biodiversity net gain sites in appropriate areas, to allow biodiversity offsetting to be focussed where it can best connect habitats and serve as green infrastructure and natural greenspace. This would align with the NPPF requirement to ‘identify and pursue opportunities for securing measurable net gains for biodiversity.’

In order to formulate more detailed policies on standards for urban green and blue infrastructure in new developments, it would be useful to identify critical urban areas that suffer from environmental issues that nature-based solutions can help solve. Areas of high summer temperature, air pollution, flooding and lack of local green space could be tackled with higher minimum levels of sustainable drainage systems, green roofs and walls and urban trees, for example.

The Plan could consider specifying that particular developments meet the Building with Nature standards <https://www.buildingwithnature.org.uk> ; for example strategic allocations, those impacting the green belt or existing wildlife corridors identified in the Nature Recovery Network mapping.

Policy PSD 1: Overall Development Strategy

The overall strategy focusses on built development, and while it mentions 'other uses' and sustainable development, it would be helpful to include a paragraph on the aims regarding green infrastructure, climate change mitigation/adaptation and nature recovery.

Policy PSD 4: Development Boundaries and the Open Countryside

In areas of open countryside, consider requiring a 20% net biodiversity gain from all development.

Development proposals should contribute where possible to improving public access to the countryside via new footpaths, accessible natural greenspace and protecting/creating new viewpoints.

Policy PSD 5: Green Belt and Safeguarded Land

We welcome the statement that development proposals for sites removed from the Green Belt and allocated or safeguarded in this plan should include compensatory improvements to the environmental quality and accessibility of remaining Green Belt land. However it is not clear whether these sites would adversely impact on the current level of greenspace provided in line with the council's adopted greenspace standards.

The Plan should require 20% biodiversity net gain for development sites released from the green belt, in order to achieve mitigation for green belt loss and contribute to a stronger ecological network.

The Plan could also consider allocating or designating key areas on the urban fringe as 'Wildbelts' to focus green infrastructure enhancement.

Policy PSD 6: Health and Wellbeing

Access to nature is an important element of maintaining both mental and physical health. Green infrastructure can also improve the urban environment by reducing air pollution and providing urban cooling. Green space that is accessible to all members of the community, all year round is important. Community shared spaces e.g. food growing spaces and outdoor covered areas can help community cohesion.



The Plan should consider adopting Building with Nature standards <https://www.buildingwithnature.org.uk> which cover water, wildlife and wellbeing to deliver high-quality healthy and sustainable developments.

New developments must enhance, and not reduce, the level of greenspace provided in line with the council's adopted greenspace standards.

Policy PSD 7: Design

The Plan should consider adopting Building with Nature standards <https://www.buildingwithnature.org.uk> which cover water, wildlife and wellbeing to deliver high-quality healthy and sustainable developments of any size.

All new developments should include climate-adapted design to combat the effects of weather extremes such as flooding, heatwaves, strong winds and severe cold, as well as tackling air and water pollution. Nature-based solutions such as sustainable drainage, green roofs and green walls should be required in particularly critical areas.

Any green infrastructure within a development should support nature's recovery and the LPA's climate change objectives.

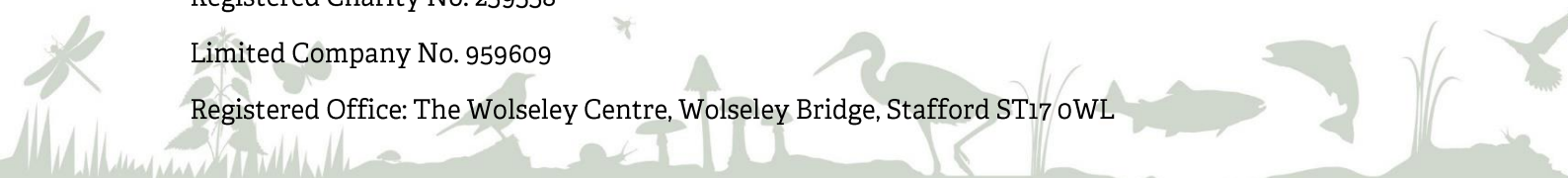
Policy CRE 1: Climate Change

Point 3:

All development (whether residential or commercial) should seek to reduce the use of mains water. Rainwater harvesting should be a requirement where feasible, as this both reduces potable water use and the risk of surface water flooding.

Point 4a:

New development, as well as regeneration and retro-fitting of existing areas, should use available environmental evidence such as heat maps, air pollution levels and flood risk maps to guide green and blue infrastructure provision. Consider setting trigger thresholds for environmental conditions to require the use of nature-based solutions, in line with nature recovery mapping, to be included in designs.



Point 7:

Greenspace design should refer to the nature recovery mapping to create habitats appropriate for the area, and include those other than woodland that capture carbon- such as species diverse grasslands and wetlands.

Point 8:

Restoration of peatlands as part of nature recovery in the borough should be supported by the plan.

Habitat and greenspace creation could specify increasing soil carbon through good use of soils and addition of organic matter such as composted green waste and biochar.

Policy CRE 2: Renewable Energy

Point 1:

The minimum requirement for major developments to provide for at least 10% of their energy needs from renewable or low carbon energy generation on site should be higher in order to reach net zero emissions targets. We suggest at least 50%.

Point 7:

It would be useful for the draft Policies Map to also show areas suitable in principle for solar energy development, in the same way that wind energy has been addressed.

Solar farms generally easily reach the mandatory level of 10% net biodiversity gain. The Plan should consider increasing this figure to 20% for solar farm projects.

Policy HOU 1: Affordable Housing

New affordable housing should provide access to shared gardens/ community growing spaces to enable residents to benefit from outdoor space.

Use of rainwater harvesting should be encouraged where possible to reduce water costs and increase climate resilience.



Policy HOU 2: Housing Mix, Density and Standards

The Plan should consider adopting Building with Nature standards
<https://www.buildingwithnature.org.uk>

Policy SE2: Flood Risk, Water Resources and Management

Natural flood management methods should be used wherever possible within developments. De-culverting of piped watercourses should be undertaken wherever possible.

Planning applications of all types should provide at minimum, outline drainage information (location, type) as part of every development, to judge impacts and integrate with landscaping. This should be included within the application boundary, and not be dealt with via conditions.

Include rainwater harvesting as part of surface water attenuation wherever possible.

Policy SE3: Water Resources and Water Quality

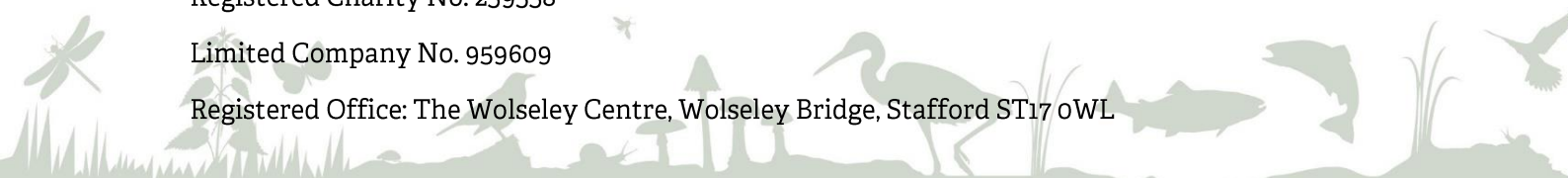
Additional suggested wording in **bold**

6. Where possible, help to conserve and enhance existing watercourses (rivers and streams) and riverside habitats in line with the (biodiversity policy and green infrastructure policy). Management and mitigation measures should seek to improve water quality and create or enhance aquatic habitats **through natural flood management techniques**

Policy SE4: Open Space, Sports and Leisure Provision

Access to nature is important for mental and physical health. All play areas should incorporate elements supporting natural play, which could include natural play features and safe interaction with water. Intergenerational spaces are important to design. Food growing spaces could be included in other open spaces.

We recommend that the Plan adopts Natural England's' Accessible Natural Greenspace Standards.





Policy SE5: Biodiversity and Geodiversity

The plan should consider requiring 20% net gain in selected areas e.g. greenbelt, in strategic wildlife corridors, or for certain types of development.

We welcome reference to the Nature Recovery Network and Local Nature Recovery Strategy, and suggest that this could be supported and facilitated by planners and developers using the Net Gain Staffordshire portal, which will provide data on optimal locations for restoration work as well as recording biodiversity net gain progress.

Point 2 – Minor developments may need to use the standard metric if priority habitats are present or off-site compensation is required.

Point 3a – Should also include any habitat areas that meet the criteria for locally designated site designation.

Policy SE7: Landscape

Planting schemes should use locally native species i.e. those present in semi-natural habitats within a 1km radius

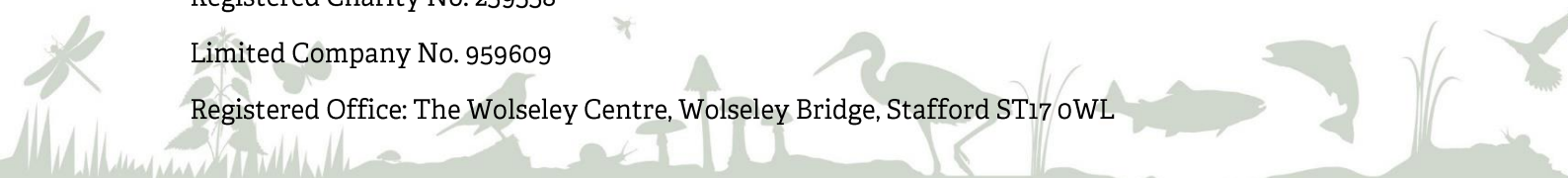
Important views from footpaths should be preserved.

Schemes should protect and strengthen existing linear features e.g. hedges, watercourse, greenways, dry stone walls (boundary features), restore historic field patterns and features where appropriate.

Tree planting patterns should be appropriate to the site and reflect local character, e.g. parkland trees, small copses, hedgerow trees, traditional orchards, shelter belts.

13 Site Allocations

The allocation site selection process does not appear to have considered the nature recovery network mapping for the borough, with regard to wildlife corridors or strategic areas for enhancement. The presence of all irreplaceable habitats, priority habitats or protected/ priority specie also needs to be considered, in line with NPPF guidance on plan making.



As current habitat data is mostly over ten years old or estimated from aerial photograph interpretation, there may be important habitats within suggested allocation sites. We recommend that before deciding on final site selection, all proposed allocation sites should undergo Phase 2 evidence base gathering to include a preliminary ecological appraisal which uses data search and site survey, where appropriate, to identify key habitat and species constraints and opportunities. Any high-distinctiveness habitats should be assessed against Local Wildlife Site criteria. We advise also that all sites are subject to a high-level BNG assessment to determine whether a 10% net gain can be achieved on the site and whether off-site compensation will be required. This will be critical to ensuring the predicted development capacity can be achieved, as well as the necessary level of biodiversity net gain. This will also help avoid potential constraints and smooth the planning process. If some sites are not suitable, alternative sites may need to be re-considered, or development capacity of current sites amended.

Several of the proposed allocation sites appear to have potential ecological constraints including presence of priority habitats, areas that may qualify for Local Wildlife Site designation and priority species that will require compensation. It is not clear whether all the sites can achieve 10% biodiversity net gain onsite. Rather than comment on every individual site, we recommend that desk based data be used to further sift sites in need of additional survey effort.

14 Approach to Strategic Allocations

AB2 Land adjoining corner of A500 and M6

Further survey is required to identify priority habitats and species within the site, to ensure these are avoided and retained and any compensation is feasible.

Brockwood Hill adjacent to the site and grassland within The Drumble has the potential to support acid grassland/ diverse grassland types. A field in the north of the site supports good quality semi-improved grassland according to MAGiC maps. Ponds, hedgerows, watercourses and possible remnant traditional orchards may qualify as priority habitats. Veteran trees may be present.

Grassland, woodland and brook corridors are present within the site. Wetland and pasture habitats are a priority for creation. 10% biodiversity net gain may be deliverable within the site, but only if key habitats are retained and sufficient green space with high-quality new habitats is created.

Kestrel, Lapwing, Badger and Brown Hare have been recorded in and around the site. Other species are likely to be under recorded. There is high potential for round nesting birds and amphibians which may be a constraint to development and require compensation areas within or outside of the area.

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15 Residential and Employment Allocations

SP11 Former Keele Municipal Golf Course

The site information states: 'Delivery of the site will need to mitigate the loss of Bogs Wood (Biodiversity Alert Site).' This Local Wildlife site is within the allocation site boundary- however development should not result in the loss of this site- it should be avoided or removed from the allocation site. Data on local wildlife sites within and adjacent the site is out of date and the areas should be re-surveyed before any decision is made on allocating this site.

The site supports some semi-natural habitats and a number of protected and priority species. As the golf course has naturalised over the course of the last few years, it has developed some ecological interest. The site should be subject to updated habitat and species surveys, particularly to identify whether any areas meet criteria for Local Wildlife Site designation.

Appendix 1: Monitoring Framework

The monitoring framework needs to include requirements for monitoring biodiversity objectives as set out in the NPPF. This should include reporting on nature recovery and biodiversity net gain, climate change objectives, water framework directive targets and greenspace standards.

Monitoring of BNG could be facilitated through supporting the Net Gain Staffordshire portal and partnership.

