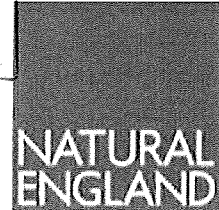
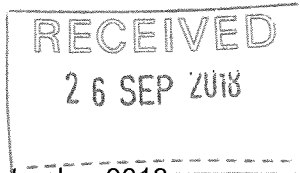


Date: 26 September 2018
Our ref: 258312
Your ref: Barrow Borough Local Plan – Consultation September 2018



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Planning consultation: Barrow Borough Council Local Plan – Modifications September 2018

Thank you for your consultation on the above dated 06 September 2018 which was received by Natural England on 06 September 2018.

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.

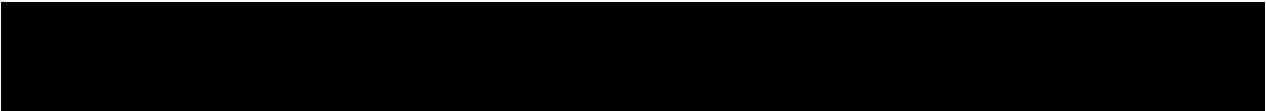
Natural England welcome the consultation on the proposed modifications to the Local Plan following the completion of the Examination Hearing Sessions and would like to provide the following comments:

Comments on Schedule of Main Modifications (Part 1) Document

Policy and Ref	Comment
MAM52 Policy N3 (Protecting Biodiversity and Geodiversity)	<p>Within the 'Schedule of Main Modifications (Part 1) document, it states the proposed wording for policy N3 has been amended to '<i>ensure alignment with the NPPF and to direct developers to the most up-to-date guidance</i>'. However, Natural England consider the policy in its current form does not align with current standards set by the NPPF and other local policy documents, and therefore requires further amendment. Please see below for further details:</p> <ol style="list-style-type: none">1. Currently the proposed policy within the Local Plan does not seek to deliver a net gain in biodiversity. However, in Barrows recently adopted Biodiversity and Development SPD, the Council have set a standard that '<i>All new development should provide net gain in biodiversity where possible</i>' (15.1). Natural England therefore consider that the Local Plan policy should be brought up to date with the SPD, and with national policy standards such as the NPPF (2018) and 25 Year Environment Plan (2018), which make a commitment to delivering biodiversity net gain through planning and development.2. The proposed amended wording states that '<i>Proposals for new development which may result in significant harm to biodiversity</i>

	<p><i>must be accompanied by appropriate surveys...'. Natural England consider this wording to be weaker than the original policy wording, and suggests that it is possible to determine whether a development will cause significant harm to biodiversity before the appropriate surveys have been carried out.</i></p> <p>Natural England recommend additional wording to refer to the adopted Biodiversity and Development SPD, which states that <i>'Applicants should complete a simple biodiversity checklist to determine whether habitats or species are likely to be present on site and whether they are likely to be affected by proposals'</i> (Para 10.1). The 'Pre-application Considerations' on page 36 of the SPD also provides guidance on this.</p> <p>3. The Proposed additional wording also states <i>'In such cases, it must be demonstrated that avoidance measures have been considered and justification for ruling these out must be given. Where significant harm is unavoidable, it should be adequately mitigated, or as a last resort, compensated for'</i>.</p> <p>Natural England recommend directly referring to the mitigation hierarchy, as referenced in the adopted Biodiversity and Development SPD, to ensure the policy meets the same standard as that set out in the SPD.</p>
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We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.



Yours sincerely

