

Date: 10 December 2015
Our ref: 170452
Your ref:



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BY EMAIL ONLY

Dear Mr. Somers

Maldon District Council Sustainability Appraisal Scoping Report Rural Allocations DPD

Thank you for your consultation on the above dated 04 November 2015 which was received by Natural England by email of the same date.

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 is broadly satisfied with the proposed scope of the Sustainability Appraisal, however we raise some areas which would benefit from amendment, to maximise the usefulness of the SA process. We presume that the Rural Allocations DPD will also be subject to Habitats Regulations Assessment (HRA), and we will be pleased to comment on this in due course. We look forward to reviewing the Rural Allocations themselves in due course.

Thank you for consulting Natural England on the above report. We have reviewed the contents of the report, and as far as our remit extends, we have sought to answer the questions arising.

Question 1: Are there other relevant plans, policies and programmes and broad sustainability objectives that will affect or influence the DPD?

We are pleased to see the main PPPs listed, including the Birds and Habitats Directives, the NPPF, the Nature Nearby report, Essex BAP, Essex Minerals Local Plan, and the Shoreline Management Plan, in particular.

Please note that the European Marine Site 2000 reference has been largely superseded by the Essex Estuaries Site Improvement Plan (SIP). The SIP provides a high level overview of the issues (both current and predicted) affecting the condition of the Natura 2000 features on the site(s) and outlines the priority measures required to improve the condition of the features. The SIP is likely to provide a means to more closely assess whether the DPD is likely to affect the condition of European sites (and also by association, nationally designated Sites of Special Scientific Interest). The Essex Estuaries SIP can be found [online here](#).

In addition, the [Natural Environment White Paper](#) (2011) should be listed, as should [Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services](#).



Question 2: Do you agree that the baseline data collected is appropriate to the DPD?

Broadly yes, we welcome the use of the Accessible Natural Greenspace Standard (ANGSt), however the report should be cautious in applying ANGSt criteria to the Blackwater Estuary, as clearly much of it is not accessible. We refer you to the relevant citations and current condition assessment [on our website](#) for an up to date picture of the current condition of designated sites. We welcome the inclusion of the relevant Landscape Character Assessment (LCA) and reference to soils surveys.

Question 3: Do you have, or know of, any additional relevant baseline data which should be added to that already listed?

The Blackwater Crouch Roach and Colne Marine Conservation Zone (MCZ) has not been included, and should be. Further details can be found [on our website](#). A conservation advice package for the MCZ is in preparation.

Question 4: As far as you are aware, are there any inaccuracies or anomalies in the data presented?

We have not checked all the statistics provided, but assume these to be correct if they have been extracted within ~ the last 6 months.

Question 5: Do you agree that the issues presented in Table 4.6 are the key sustainability issues for Maldon?

The SA should refer to the Essex Estuaries SIP for a more up to date assessment of the sustainability issues for the environment in particular. We recommend that the table is updated to reflect the SIP. NE welcomes inclusion of the HRA, and expects consultation on this document in due course.

Question 6: Are you aware of any issues which, in your opinion, should be added or any that should be removed?

As above, the table should be updated to reflect the issues identified in the Essex Estuaries SIP.

Question 7: Are the proposed SA Objectives suitable in the context of Maldon?

The sustainability objective 6 “Biodiversity” (which includes “landscape” and “green infrastructure”) fails to recognise the contribution of the natural environment to economic and social themes, which is disappointing. Figure 20 should be amended to make these links. For further information about the contribution of the natural environment to economic objectives in particular, please see Natural England’s [Microeconomic Evidence for the Benefits of Investment in the Environment 2 \(MEBIE2\) \(NERR057\)](#) report. You may wish to consider re-naming this objective, of which “biodiversity” is just one element.

We note the “?” uncertain compatibility between objective 6 “biodiversity” and objective 2 “housing.” We agree that this is an appropriate selection, as it recognises that a careful assessment is required to resolve any impacts arising, through appropriate avoidance; mitigation; and compensation measures.

Question 8: Are there any additional SA Objectives that should be included? Should any be removed?

As above, we suggest that to be meaningful, the “Biodiversity” objective should be split up to

provide a more targeted approach to SA. This objectives could then be assigned to “Biodiversity and Geodiversity”; “Landscape”; and “Green Infrastructure”.

Question 9: Do the indicators provide relevant measures for the associated objective? If not, please suggest additional indicators.

The single indicator for “biodiversity” does not cover all the topics within this very broad objective. Whilst the key questions are better at distinguishing the various elements, the Sustainability Framework (Figure 22) needs further work to make the SA a meaningful exercise. Indicators need to be identified for landscape and green infrastructure. This might include reference to key landscape character features, or the loss of multi-functionality of key green infrastructure assets, for example. Cross reference should be made to relevant landscape assessments and green infrastructure strategies to understand what an appropriate indicator might look like.

Question 10: Do you have any comments on the suggested targets, or can you propose any refinements?

The targets / indicators should include Natural England’s condition assessments, but should also include number and area of local wildlife sites, and how many are in active management, for example. The green infrastructure indicator should test whether an allocation reduces the functionality of the GI asset in question. This requires prior knowledge of the GI contribution made by a particular area, which should be set out within the GI Strategy.

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.

For any queries relating to the specific advice in this letter only please contact me on 01206 382751. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

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