



Position Statement: Planning with nature

June 2021

Achieving more for nature



GLNP
GREATER LINCOLNSHIRE
NATURE PARTNERSHIP

Introduction

The Greater Lincolnshire Nature Partnership (GLNP) received official status as a Local Nature Partnership on 17 July 2012 and was formally launched on 8 November 2012. This followed an extensive consultation period and application process that resulted from the publication of 'The Natural Choice' White Paper in June 2011. The GLNP is building on the success of its predecessor organisation the Lincolnshire Biodiversity Partnership.

From the start of the Local Nature Partnership consultation, spatial planning was highlighted as a key area for Greater Lincolnshire and one that the Local Nature Partnership should work on.

The agreed vision for the planning with nature workstream is *Planning processes across Greater Lincolnshire make the most of opportunities for nature*. See the Business Plan for more details on planned actions under this workstream.

The policy points below are intended for use in local authority spatial planning context. However these are points of principle and may reasonably be used in other contexts where the principles apply, for example marine planning or utilities' plans.

Points for advocacy

1. All planning authorities should recognise and implement their legal and policy duties to protect and enhance biodiversity, as supported by other stakeholders

No net loss is no longer enough, a net gain in biodiversity must be achieved. Biodiversity losses in Greater Lincolnshire have been huge and still continue, these must be halted and nature recovery achieved. Existing sites of value¹ should have protection and this in turn will contribute to the protection of valuable species².

Valuable sites and valuable species also need to be seen as part of an ecological network, meaning that development in one place can affect a valuable site or other species elsewhere. These impacts, individually and cumulatively, need to be assessed in the same way as the impacts of developments on the road network or schools infrastructure may be assessed.

It is not enough to only protect remaining biodiversity. Enhancement is critically important as England's wildlife areas do not currently represent a coherent and resilient ecological network – the quality and extent of this network needs to be improved. Managing, restoring and creating habitat in the right places helps rebuild the network and enables species to thrive not just in one place but across wider landscapes.

¹ Sites of value is taken here to mean those protected by law, those protected by planning policy and those without protection but still containing valuable habitats or species.

² Valuable species are taken here to mean those protected by law, those protected by policy and those without protection, particularly if they are rare or scarce in Greater Lincolnshire

Enhancement can take several forms: restoration of degraded sites; creation of entirely new areas of value; or changing the management of existing sites to increase value. Such enhancement does not have to be costly or onerous.

Mandatory net gain in biodiversity through the planning system is key for the enhancement of the natural environment and the ecological networks which support it. It is also an integral part of any natural capital approach.

Protection, enhancement and management of the natural environment is a crucial part of climate change adaptation.

The GLNP supports a mitigation hierarchy for development (see Appendix 1).

2. All planning authorities should recognise the importance of natural capital and the resulting ecosystem services within the planning system

The planning system should recognise the concept of natural capital and the wider benefits of the natural environment, integrating these within planning aspirations and seeking to deliver multiple benefits.

These wider benefits are called 'ecosystem services' as they are best provided by a resilient and healthy ecosystem. Such services include natural resources such as food, timber and water and functioning natural systems such as healthy and fertile soils; clean water and air; and a regulated climate.

Ecosystem services are vital support services for our wellbeing and economic growth and are themselves sustained by biodiversity. Of the ecosystem services that have been assessed 30% are declining, as a consequence of long-term declines in habitat extent or condition. By taking a strategic natural capital approach and considering the natural environment and ecosystem services in wider planning aspirations this trend can be reversed and the consequent development will support sustainable growth and communities.

Further detail on the GLNP's position on health and wellbeing and the role of planning can be found in *Position statement: Being well with nature*.

3. All planning authorities should recognise that protection and enhancement of geodiversity is an important part of the planning system

Geodiversity is the variety of rocks, minerals, soils and landscapes together with natural processes which form them. Our geodiversity provides resources needed to sustain our way of life. The value of this is not well recognised within the planning system currently. The particular geodiversity resources of Greater Lincolnshire need to be recognised, protected and enhanced.

The priority areas for achieving this are on current and previous mineral extraction sites. Such sites are also priorities for biodiversity once extraction has ceased. As such both



priorities need to be considered and planned for together. Criteria based policies for geodiversity should be included within local plans.

4. All stakeholders need a clearer understanding of roles and responsibilities within the planning system

Work undertaken by the Greater Lincolnshire Local Enterprise Partnership in winter 2012-13 found that most stakeholders only understood a part of the planning system, rather than the whole of it from start to finish. This leads to confusion and a 'blame culture' when there are delays. Greater clarification of roles and processes may help to improve development management in particular, and generate better and more positive outcomes for all.

Better communication and joint working between all involved are key ways to achieving a more effective planning system, but change will not happen overnight. There needs to be a continual and long term commitment to improvement.

Organisations with the relevant expertise should be proactively engaged in the preparation of planning policy to ensure that the natural environment is included at the earliest stage possible.

5. All stakeholders should recognise that Local Plans are the key to future planning and should contain robust policies for the protection and enhancement of biodiversity, geodiversity and green infrastructure

Local Plans are the key means for guiding growth in local areas; in order to be effective these need to reflect both national legislation and policies, and local needs.

Sustainable development is at the heart of all planning policy as set out in the National Planning Policy Framework. Local Plan policies must recognise the value of Greater Lincolnshire's natural environment to the visitor economy; public health and wellbeing; and in providing local jobs. The GLNP position statements for *Being well with nature* and *Enjoying nature* give further detail on nature's role in these two respects.

Central to ensuring effective local planning and policy making is sourcing and maintaining credible data and integrating the environment with economic and social aspirations. This investment will pay dividends when Local Plans and development management requires the information to support decision making. This should include the development and use of Biodiversity Opportunity Mapping.

All stakeholders should engage with the local planning process to ensure this happens.

6. Planning authorities and LNPs must see the duty to cooperate as a real opportunity for proactive ongoing consultation and strategic consideration of biodiversity and geodiversity

The duty to cooperate provides an opportunity to integrate strategic concerns and more effectively deliver sustainable solutions that meet local needs and deliver growth in a way that truly integrates the natural environment along with other planning aspirations. This should not only fulfil the requirements of the National Planning Policy Framework but also result in better outcomes.

For example biodiverse green infrastructure networks could:

- Form part of a Sustainable Urban Drainage scheme of a new development;
- Form cycle ways and be part of a sustainable traffic scheme;
- Develop green routes for pollution absorption contributing to health agendas;
- Enhance local landscapes and distinctiveness, therefore improving the tourism offer;
- Increase property values and help with future investment potential.

The proactive nature of such discussions will enable biodiversity to be fully integrated within developments at a lower (or no) cost, and the long term management costs again to be appreciated and integrated. This will ensure that the benefits are realised and continue into the long term rather than failing due to poor management.



Further information

- Catchment Based Approach ([CaBA](#))
- Greater Lincolnshire Nature Partnership (2019) Central Lincolnshire Biodiversity Opportunity Mapping
- Greater Lincolnshire Nature Partnership (2019) North Lincolnshire Biodiversity Opportunity Mapping
- Greater Lincolnshire Nature Partnership (2020) East Lindsey Biodiversity Opportunity Mapping
- Greater Lincolnshire Nature Partnership (2020) North East Lincolnshire Biodiversity Opportunity Mapping
- Central Lincolnshire Joint Planning Unit (2011) [Green Infrastructure Study for Central Lincolnshire](#)
- Cieem (2019) [Biodiversity Net Gain – Principles and Guidance for UK Construction and Developments](#)
- Defra (2011) [Biodiversity 2020: A strategy for England’s wildlife and ecosystem services](#)
- Defra (2015) [What nature can do for you: a practical introduction to making the most of natural services, assets and resources in policy and decision making](#)
- Defra (2020) [Enabling a Natural Capital Approach: Guidance](#)
- Greater Lincolnshire Nature Partnership (2016) [Local Geodiversity Strategy](#)
- HM Government, (2011) [The Natural Choice: securing the value of nature](#) (paragraph 2.8)
- HM Government (2018) [A Green Future: Our 25 Year Plan to Improve the Environment](#)
- Lawton, *et al.* (2010) [Making space for nature](#)
- MHCLG (2019) [National Planning Policy Framework](#)
- MHCLG (2019) [National Design Guide: Planning practice guidance for beautiful, enduring and successful places](#)
- Natural England [National Character Areas clickable map for the East Midlands](#)
- RSPB, CIEEM and the RTPI (2013) [Planning naturally: spatial planning with nature in mind: in the UK and beyond.](#)
- Town & Country Planning Association and The Wildlife Trusts (2012) [Planning for a healthy environment: good practice guidance for green infrastructure and biodiversity](#)
- The Wildlife Trust (2018) [Towards a wilder Britain](#)
- UK Geodiversity Action Plan website:
<http://www.ukgap.org.uk/media/8544/ukgap.pdf>
- UK National Ecosystem Assessment (2011) [The UK National Ecosystem Assessment: Synthesis of the key findings](#)

Organisations supporting this Position Statement

The organisations listed here support the principles above. However these organisations may take a different view in individual cases based on their circumstances.



Appendix 1: The mitigation hierarchy

A mitigation hierarchy is embedded within paragraph 175 of the National Planning Policy Framework. This Appendix details the mitigation hierarchy and advocates how this should be put into professional practice.

It should also be emphasised that this mitigation hierarchy assumes that all the principles described in the main document have been followed. In particular, that sufficient information is available at the start of the process as this is an often overlooked area. Information on a site's biodiversity resource is needed in order to inform the design and consideration of development proposals. Firstly to protect existing features of value and secondly to conserve and enhance them with reference to adjacent features. Developing this evidence base at the start of a proposal will avoid delays, unnecessary costs and will enable a better plan to be developed from the outset with all the relevant stakeholders.

The mitigation hierarchy – paragraph 180 of the National Planning Policy Framework

When determining planning applications, local planning authorities should apply the following principles:

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

Points for professional Practice

All development should secure net gains for biodiversity of at least 10%. Developers should use the Defra Biodiversity Metric to achieve this.

Step one – Avoid

The first step is that significant harm should be avoided, for instance by locating development at a different site. Where a proposal will cause significant harm planning applications should include an assessment of alternative sites.

Step two – Mitigate/reduce

If an impact cannot be avoided, the next step is to consider if alternate positive activities can be taken on the development site to mitigate for the impacts. All mitigation must meet the requirements for biodiversity net gain as prescribed by the 2021 Environment Act.

This option is popular but should only be reached by going through step one first. If appropriate mitigation through planning conditions or legal agreements should:

- Be designed by a professional with appropriate expertise;
- Have adequate money allocated from the development to ensure ongoing maintenance;
- Be monitored by the planning authority, or appropriate body, with penalties put in place for non-compliance.

Step three – Offset/compensate

This is the last step and should be considered a last resort, it should only be reached by going through steps one and two first. This stage would only consider the residual impacts

that have not been avoided or mitigated. All offsetting measures must meet the requirements for biodiversity net gain as prescribed by the 2021 Environment Act.

Offsetting is a complex and emotive issue. Until the results of the government consultation are announced and there is a clear national direction, the following is GLNP policy:

- Offsetting should be local, practically this means within the local authority area in which the development is taking place. Ideally the offsetting would be located adjacent to an area of existing habitat in order to expand areas of existing habitat increasing resilience;
- Offsetting of habitat should be on a like for like habitat basis, this means a wetland will be replaced with a wetland of similar characteristics;
- Offsetting ratios will follow best practice guidelines as they are developed;
- Creation of the offset site should be started before the original habitat is lost in case species translocation is required;
- Offsetting is only designed and undertaken by professionals with appropriate expertise and after consultation with relevant stakeholders;
- Adequate money is allocated from the development to ensure ongoing management of the offset site;
- Irreplaceable habitats cannot be offset and in these cases permission should be refused as described in the 175 of the National Planning Policy Framework. Such habitats in Greater Lincolnshire include Ancient Woodland, ancient and veteran trees, ancient hedgerows, traditional unimproved meadows/ancient grasslands, peatbogs and dunes.



Appendix 3: Planning situation in Greater Lincolnshire

The mood among the planning departments associated with the GLNP appears to be mixed, but there are definite moves towards sustainable development and consideration of environmental issues, especially climate change. There is a considerable amount of work to achieve with continued reductions in staff and resources, on top of this they are being faced with a lot of potential change within the planning system. The five key issues for planning with nature appear to be:

- Impetus to achieve targets of net zero by 2050;
- The need for economic recovery post Covid 19;
- The rise of pre-application advice in order to smooth the application process for larger developments;
- Uncertainty arising from the Environment Bill and Government Planning White paper with potential to greatly impact the local planning system;
- A lack of ecological expertise within planning departments.

The current status of local plans is:

Authority	Plan	Status	Areas to influence
Lincolnshire County Council	Minerals and waste	Adopted 2016	
South East Lincolnshire Joint Strategic Planning Committee (Boston and South Holland)	Core strategy	Preparing to review Local Plan, No timeline in place	✓
Central Lincolnshire Joint Planning Unit (Lincoln, North Kesteven and West Lindsey)	Core strategy	Currently reviewing Local Plan. Draft consultation expected Summer 2021	✓
East Lindsey	Core strategy	Preparing to review Local Plan. Issues and options consultation February 2021	✓
North East Lincolnshire	Core strategy	Adopted 2018	
North Lincolnshire	Core strategy	Currently reviewing Local Plan. Draft consultation expected Spring 2021	✓
South Kesteven	Core strategy	Currently reviewing Local Plan. Draft consultation expected August 2022	✓

NB. There may be Supplementary Planning Documents that are important to influence but these are too numerous to list here, these will be kept under review.

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Greater Lincolnshire Nature Partnership

Banovallum House
Manor House Street
Horncastle
Lincolnshire
LN9 5HF

Tel: 01507 528398

Email: info@glnp.org.uk

Web: www.glnp.org.uk

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Fran Hitchinson

Amy Bouic

Luke Bamforth



GLNP
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