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Dear Mr Regan,

Local Development Framework – Core Strategy

Thank you for your letter and enclosures dated 18 February 2010, requesting Natural England's views and comments on the above consultation document.

Natural England is the Government agency that works to conserve and enhance biodiversity and landscapes, promote access to the natural environment, and contribute to the way natural resources are managed so that they can be enjoyed now and by future generations.

Chapter 1: Introduction

Under paragraph 1.15 the key measures for the borough are listed, this list includes "protecting and enhancing open space and areas of biodiversity" and Natural England is pleased to see this measure included.

Chapter 2: Lewisham Today

Environment - Climate Change is referenced under paragraph 2.7 and the inclusion of this section is welcomed. However, the Council need to consider linking Biodiversity and the natural environment which can lead to various opportunities, not just for wildlife activity and connection, but also health, recreation, contributing to climate change adaptation and improving quality of life. This can be linked to the section above and other sections of the Core Strategy strengthening the document further.

Chapter 3: Drivers of Change

The preservation and enhancement of local biodiversity is mentioned under paragraph 3.8 in relation to the section on Adapting to Climate Change and Environmental Management, which is welcomed and links in to the comments above regarding the links between Climate Change and biodiversity, there currently appears to be a strong approach towards energy efficiencies, to meet this challenge, when Green Infrastructure can also be used to strengthen the document and the Council's approach. This can be made explicit in the Core Strategy and policies included to ensure the borough's green infrastructure is designed to deliver multiple functions and support other elements and objectives of the Strategy.

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Chapter 5: Strategic Objectives

The inclusion of environmental management under the five main themes is welcomed.

Objective 5: Climate Change

This objective is supported, especially section (e) “supporting environmental protection and enhancement, including ecological networks.

Objective 7: Open Space and Environmental Assets

This objective is supported

Natural England would encourage the council to include the provision of “soft” landscaping, where appropriate, within open and public spaces. This can help meet this objective together with contributing towards the climate change mitigation/adaptation objectives also.

Objective 9: Transport and Accessibility

Natural England welcomes schemes and initiatives which promote sustainable transport options including walking and cycling.

Chapter 6: The Spatial Strategy

Spatial Policy 1: Lewisham Spatial Strategy

The strategy to include the protection and seek a net gain of open space provision (sub section 4) is welcomed and supported.

Spatial Policy 2: Regeneration and Growth Areas

This Policy is supported especially in relation to section (j) which refers to improving the relationship with the River Thames. The Council needs to consider the potential for improvements, enhancements and realignments of the Thames Path National Trail, where possible.

The Council should also consider the potential for Green Infrastructure contributions towards the Climate Change elements of the Policy, in conjunction with the energy efficiency measures identified under section 3A.

Section3C - Open Space and Environmental Assets refers to the proposals for new green areas and connectivity, paragraph 6.56 and this is welcomed and encouraged.

Chapter7: Cross Cutting and Thematic Policies

Core Policy 11: River and waterways Network

This Policy is supported and we refer to our earlier comments in respect of the Thames Path National Trail also. The Council should also give consideration to the use of the existing natural signature of the borough which can be used to help deliver this objective, and that of biodiversity protection and enhancement. Natural signature refers to the underlying landscape of an area, which if drawn out, can make a direct and powerful contribution to ‘sense of place’ and local distinctiveness.

Natural England has recently produced the London Landscape Framework which gives further guidance on the ‘natural signatures’, including a section on the Wandle river valley. WE recommend that you refer to this document and ensure that it is reflected in the Green Grid section of the Core Strategy. The London Landscape Framework can be found at:

<http://www.naturalengland.org.uk/regions/london/ourwork/londonnaturalsignatures.aspx>

Core Strategy Policy 12: Open Space and Environmental Assets

This Policy is supported and reference is made to our comments above in respect of Rivers and Waterways and our Natural Signature works.

Core Strategy Policy 14: Sustainable Movement and Transport

Natural England welcomes and commends schemes and initiatives which promote and encourage sustainable transport options, including walking and cycling.

Chapter 8: Strategic Site Allocations

Natural England will comment on specific site development proposals as the schemes are brought forward and potential uses identified.

Appendix 5: Sustainability Objectives

There are nineteen (19) objectives listed which can be broadly supported, and in particular Objectives (5), (6), (8) and (9).

Sustainability Appraisal and Strategic Environmental Assessment

This Appraisal/Assessment covers the areas and issues that Natural England would wish to see considered in such a document. The proposed nineteen (19) Objectives listed can be broadly supported, especially; Objectives (5), (6), (8) and (9).

Appendix 2: Appropriate Assessment

The conclusion of this appendix that Stage 1 (Screening) of the document is required and that a full Appropriate Assessment, Stages 2 and 3 are not required is supported in respect of this document and in this instance.

The Council should also give consideration that subsequent Local Development Framework documents treat the open space network as part of an integrated system providing Green Infrastructure, together with improvements to the Borough's Blue Ribbon network would be encouraged and supported.

I hope that this makes Natural England's position clear but if you have any further questions about this letter or require further information please do not hesitate to contact me.

Yours Sincerely,

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