

**From:** [Westbrook, David](#)  
**To:** [Browning, Paul](#); [Strategy](#)  
**Subject:** Natural England: Somerset West and Taunton: District wide Local Plan to 2040: Duty to Cooperate (DtC)  
**Date:** 16 March 2020 23:58:48

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Thank you for your consideration

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Date: 16 March 2020  
Our ref: 305617



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**BY EMAIL ONLY**

Dear Paul

**Planning consultation: Somerset West and Taunton: District wide Local Plan to 2040: Duty to Cooperate (DtC)**

Thank you for your consultation on the above, which was received by Natural England on 13 January 2020

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.

**General**

Natural England welcomes the Duty to Cooperate, as a valuable record of cooperation between our organisations in the preparation of the Somerset West and Taunton Local Plan to 2040. We are in general agreement with the assessment of cross-boundary strategic issues. In addition, we have the following comments on the current Duty to Cooperate:

**Internationally and Nationally Designated Sites**

Nature - and many of the human influences upon it - do not recognise and, indeed, cut across administrative boundaries.

Policies in the Local Plan have the potential to impact on designated sites within the Plan area and also on designated sites in neighbouring Districts. For example, there is growing concern at the potential cumulative effect of nutrient pollution on wetland Protected Sites in the Somerset Levels and Moors from farming and development. The river catchments draining into this area lie within multiple local authority areas - including Somerset West and Taunton.

As a first step, we recommend referring to our SSSI Impact Risk Zones (available on [Magic](#) and as a downloadable [dataset](#)) in order to determine the scale of risks.

**Biodiversity Net Gain**

The [Government's 25 Year Environment Plan](#) makes an explicit reference to "*Embedding an 'environmental net gain' principle for development, including housing and infrastructure*" with a particular emphasis on securing this from housing and infrastructure development. The focus is

initially on achieving biodiversity net gain and extending that to encompass natural capital gains and beyond.

The National Planning Policy Framework (NPPF) includes a number of strong reference to net gain in the development of Local Plans and spatial development strategies.

### **Infrastructure Provision**

We recommend you also include green infrastructure here. Is there a green infrastructure strategy and delivery plan? Were other duty to cooperate organisations involved? The provision of green infrastructure can be cross-boundary and help to deliver on multiple goals, including biodiversity net gain.

### **Housing**

We note that the LPA is currently the housing need target for the new Local Plan has not yet been determined. Although it is not a statutory duty, Natural England would welcome future consultation on any development of HELAA methodology.

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.

If you have any queries relating to the advice in this letter please contact me using the details below.

For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

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