

From: [REDACTED]
To: [Planning Policy](#)
Subject: Ilkley Neighbourhood Plan
Date: 10 September 2021 11:22:19
Attachments: [image001.ipq](#)

CAUTION: This email has originated from outside Bradford Council.
Do not click links or open attachments unless you recognise the sender and know the content is safe.

Thank you for consulting the Trust on the Ilkley Neighbourhood Plan.

Yorkshire Wildlife Trust works across the Yorkshire and Humber region managing more than 100 reserves and with a membership of over 44,000. Yorkshire Wildlife Trust is the second oldest of the 46 Wildlife Trusts which work in partnership to cover the whole of the UK. The Trust's principal vision is to work for a Yorkshire rich in wildlife, valued and enjoyed by people.

we feel there are some aspects which are missing within the plan, or considerations which could make it stronger, in particular with regards to biodiversity.

In relation to a number of policies, including but not limited to INDP1, INDP2, INDP3, INDP4, INDP6, INDP10, INDP12, INDP13 and INP15, we would strongly recommend the incorporation of the wish to see development designed in line with Building with Nature standards.

Building with Nature is a framework that enables developers to integrate high-quality multifunctional green infrastructure to create places in which people and nature can flourish. It provides developers with a possible mechanism to deliver a number of local policies and to meet the targets being explored by WYCA, and set out in this plan, to improve Green Infrastructure across the region.

Building with Nature sets out standards to provide a benchmark in order to provide a qualitative assessment of a proposed development site. The Building with Nature (BwN) key themes are:

- Core – Distinguishing green infrastructure from a more conventional approach to provision of open and green space.
- Wildlife – to protect and enhance wildlife, creating networks where nature can thrive, and supporting the creation of development which more effectively delivers a net gain for wildlife.
- Water – a commitment to improving water quality, on site and in the wider area: reducing the risk of flooding and managing water naturally for maximum benefit.
- Wellbeing – to deliver health and wellbeing benefits through the green features on site, making sure they can be easily accessed by people close to where they live.

Building with Nature is a voluntary approach developed by practitioners, policy-makers and academic experts, and tested with the people who will use and benefit from the framework. There are three levels of accreditation; Design, Full (Good) and Full (Excellent) and schemes can be assessed at pre-application, reserved matters and post-construction/in-use stages. Further information can be accessed via the website: <https://www.buildingwithnature.org.uk>. Yorkshire

Wildlife Trust has two Building with Nature trained assessors and is keen to progress this approach with developers.

We would also recommend the consideration for inclusion of a lighting policy to refer to Bat Conservation Trust (BCT) and Institute of Lighting Professionals (ILP) (2018) artificial Lighting Guidance. This guidance will help developments to design lighting in an appropriate manner to retain dark corridors and protection for wildlife throughout the village.

The plan fails to fully identify nature conservation sites within and adjacent to the plan area, with **INDP10, INDP11 and INCP13** being the only consideration of conservation.

These policies downplay the value of the site as LWS (formerly known as Sites of Importance for Nature Conservation) which are of great significance as core wildlife-rich habitats of substantive nature conservation value and taken together with Sites of Special Scientific Interest (SSSIs), they represent a major national asset, essential to nature's recovery. LWS play a critical conservation role by providing wildlife refuges, acting as stepping stones, corridors and buffer zones to link and protect nationally and internationally designated sites – improving ecological coherence and connectivity and contributing to a climate resilient landscape. With no statutory status, their only form of protection is through good planning policy and decisions.

For a long time, it has been recognised that, whilst they are important, SSSIs are not sufficient to truly protect biodiversity in England. So, together with SSSIs, LWS support locally and nationally threatened species and habitats and they are the essential building blocks of ecological networks and the core from which we can achieve nature's recovery. Unlike Sites of Special Scientific Interest (SSSIs), which for some habitats are a representative sample of the sites that meet national standards, LWS systems are more comprehensive and select all sites that meet the criteria. As a result, many LWS are of SSSI quality and together with the statutorily protected sites, contain most of the country's remaining high quality natural habitat and threatened species.

Strengthening the protection of these specific designations to only allowing direct impacts in exceptional circumstances will strengthen the planning balance towards their protection and retention throughout the lifetime of the plan. This is also of importance to identify ancient woodland as irreplaceable, ensuring development is not permitted in line with NPPF.

We are glad to see consideration for improving the connectivity of greenspaces within **Policy INDP11**, and for development to contribute to this connectivity and enhancement of existing greenspaces.

Aspirations for the enhancement of biodiversity, could also be further supported by a strong commitment for development to deliver a **minimum of 10%** biodiversity net gain, as is expected to be mandated by the Environment Bill later in 2021. Inclusion of such a policy will ensure clarity for any developments in the locality to deliver such schemes and provide a mechanism by which it can be secured.

The plan could then go further to demonstrate land which would be preferential to receive enhancements as a result of such a scheme.

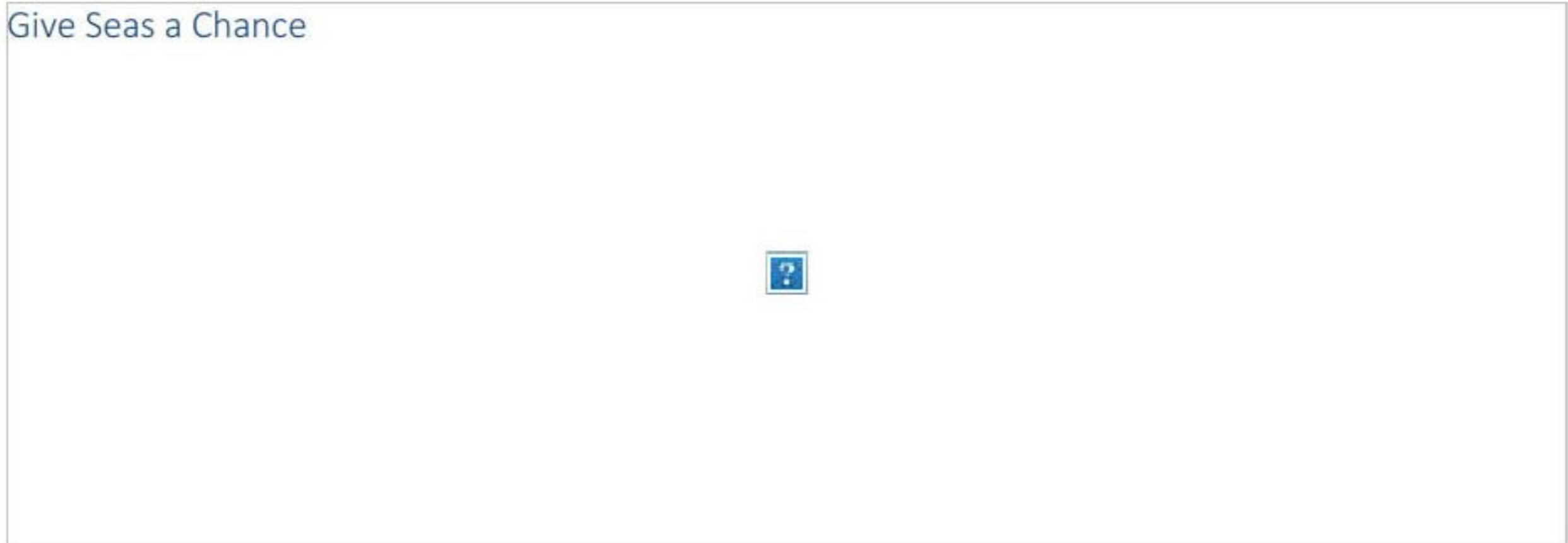
I trust these comments are helpful. Please feel free to get in touch should you have any queries.

Kind Regards,

Laura Hobbs MCIEEM
Conservation Planning Officer
Yorkshire Wildlife Trust



Give Seas a Chance



Yorkshire Wildlife Trust is a company limited by guarantee, registered in England Number 409650.
Registered Charity Number 210807. Registered Office: 1 St George's Place, York, YO24 1GN.