

Date: 05 December 2018  
Our ref: 262485  
Your ref: Additional Travellers Sites.



Herefordshire County Council

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**BY EMAIL ONLY**

Dear Planning Team

### **Herefordshire Travellers Sites Development Plan Document - additional sites**

Thank you for your consultation on the above dated 24 October 2018.

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.

Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.

### **Site 1: Oakfield, Nash End Lane, near Bosbury**

**While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment, but may nonetheless have some effects. We therefore do not wish to provide specific comments, but advise the you to consider the following issues:**

#### **Green Infrastructure**

This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area.

The National Planning Policy Framework states that local planning authorities should plan '*positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure*'. The Planning Practice Guidance on [Green Infrastructure](#) provides more detail on this.

Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities.

There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through:

- green roof systems and roof gardens;
- green walls to provide insulation or shading and cooling;

- new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity).

You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.

Further information on GI is include within The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "[Good Practice Guidance for Green Infrastructure and Biodiversity](#)".

### **Biodiversity enhancement**

This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the [Exeter Residential Design Guide SPD](#), which advises (amongst other matters) a ratio of one nest/roost box per residential unit.

### **Landscape enhancement**

The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might makes a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.

For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.

### **Other design considerations**

The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity ([para 125](#)).

### **Strategic Environmental Assessment/Habitats Regulations Assessment**

A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance [here](#). While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.

Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.

## **Site 2: Land at Stoney Street, near Madley (for up to 10 pitches)**

Land at Stoney Street near Madley falls within the River Wye Special Area of Conservation (SAC) Catchment area.

We note the HRA provided for this consultation does not consider impacts on water quality and quantity. Although these issues were considered in previous consultations by your authority on traveller sites put forward to undertake your HRA, it is not clear whether the addition of these two sites put forward can lead your authority to determine there will be no Likely Significant Effect on the River Wye SAC as a result of the potential increase in phosphate levels.

A Nutrient Management Plan has been devised for the River Wye SAC Catchment, the ability of the Nutrient Management Plan to achieve the conservation objective for phosphates for the River Wye SAC during the plan period 2027 is based on levels of development not exceeding what is set out in the Herefordshire Core Strategy. If levels of development exceed those allocated within the Core Strategy then the Nutrient Management Plan cannot be relied upon alone by your authority as the competent body to come to a finding of no likely significant effect. Therefore the HRA should confirm that the additional site at Madley can be accommodated within the available headroom/phosphate allowance.

Should you have any questions relating to this response, please contact Andy Stubbs on 02080261978. For any future consultations please consult Natural England at [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

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