

Date: 26 February 2016
Our ref: 178442
Your ref: Herefordshire Local Transport Plan



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BY EMAIL ONLY

Dear Mr Callard

Re: Herefordshire Local Transport Plan 2016-2031

Thank you for your consultation on the above dated and received by Natural England on 09 February 2016.

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.

Local Transport Plan strategy consultation draft

The Hereford Transport Package could potentially have an adverse effect on the interest features of the River Wye SAC and SSSI and any proposals coming forward will need to avoid impacts where possible and offer appropriate mitigation, where they cannot.

Local Transport Plan 2016-2031 policy

Policy LTP AM5 Reducing our Environmental Impact and Responding to Climate Change

We welcome this policy. We note that LEDs will be used for street lighting. Consideration should be given to brightness and direction of lighting to ensure that water courses and other wildlife corridors are not unnecessarily and artificially light.

We also advise adding additional criteria for green infrastructure. Green infrastructure refers to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to provide multiple benefits including space for recreation, access to nature, flood storage and urban cooling to support climate change mitigation and adaptation, food production, wildlife habitats and health & well-being improvements provided by trees, rights of way, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands.

There is an opportunity to improve the multifunctionality of road verges and other transport infrastructure and to create ecological networks that are coherent and resilient and that provide improved air and water quality in line with the principles of the Lawton Review.

Climate Change

Ecological networks are coherent systems of natural habitats organised across whole landscapes so as to maintain ecological functions. One key principle is to maintain and increase connectivity - to



enable free movement and dispersal of wildlife. A second key principle is to ensure resilience to climate change. You may find Natural England's National Biodiversity Climate Change Vulnerability Assessment data of use in determining the vulnerability of your ecological networks to climate change. The data can be found [here](#) and the report can be found [here](#).

Natural England has recently undertaken two reviews that may be relevant when considering reducing environmental impact and responding to climate change:

- [Green Bridges – A Literature Review \(NECR 181\)](#), August 2015.
- [Review of literature: how transport's soft estate has enhanced green infrastructure, ecosystem services, and transport resilience in the EU \(NECR169\)](#), December 2014.

We would also recommend [Plantlife's Road Verges and Wildlife Management Guidelines](#), April 2015.

Soil Protection

Soil is a finite resource that fulfils many important functions and services (ecosystem services) for society; for instance as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably. Some of the most significant impacts on soils occur as a result of activities associated with construction activity. We advise that this code is used as part of addressing soils in development plan policies. For further information see <http://www.defra.gov.uk/publications/2011/03/27/construction-cop-soil-pb13298/>.

[Policy LTP AT1 - Maintaining and extending our active travel infrastructure](#)

[Policy LTP AT2 – Active travel network in new developments](#)

We welcome these policies.

15. Do you have any further comments you would like us to consider?

We would welcome prioritisation of spending on walking and cycling schemes and making public transport more viable and attractive.

We would also refer you to the [Design Manual for Roads and Bridges](#) which provides good practice for designing roads and bridges.

Strategic Environmental Assessment

16. Do you agree with the approach taken for this SEA? If not, please explain why?

Yes.

17. Do you agree with the findings of the SEA? If not, please explain why?

Yes.

18. Do you have any recommendation for further indicators or parameters to include in the monitoring framework of the SEA?

No.

19. Do you feel the performance indicators (Page 36 LTP4 strategy and delivery) will accurately reflect the true picture of Transport in Herefordshire? If no please explain why

No. We would recommend an indicator for the area of green infrastructure and ecosystems services (clear air/ water etc) created.

20. Which of the policies or schemes identified in LTP 4 will be most beneficial to you?

No comment.

21. Do you feel you will be disadvantaged by the policies or schemes identified in LTP 4?

No comment.

Should a Habitats Regulation Assessment (HRA) be undertaken?

We advise that the Local Transport Plan should have its own HRA as it contains policies, and some of these may have the potential to impact on European sites.

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.

For any queries relating to the specific advice in this letter only please contact [redacted] on [redacted] [redacted] For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

[redacted]

[redacted]

South Mercia Team