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Our ref: 115763
Your ref: None given



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BY EMAIL ONLY

Dear Sir/Madam

Site Allocations and Management of Development (SAMDev) Plan: Pre-Submission Draft (Final Plan)

Thank you for your consultation on the above dated 17 March 2014 which was received by Natural England on the same date.

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.

There is much to support in this pre-submission draft of the Site Allocations and Management of Development (SAMDev) Plan for Shropshire. Natural England particularly welcomes the inclusion of policies *MD2: Sustainable Design* and *MD12: Natural Environment*. We also welcome the integration of green infrastructure into selected place policies, the protection afforded to the landscape, particularly the Shropshire Hills Area of Outstanding Natural Beauty and the intended protection and enhancement of biodiversity.

However, it is Natural England's view that the SAMDev Plan is not sound with respect to the following policies:

- MD5 Sites for sand and gravel working; MD5a Phase 1 site allocations, and; Wood Lane North extension (Ellesmere)
- MD12: The Natural Environment
- S2: Bishop's Castle Area and associated policies including S2.2(i): Bucknell; S2.2(iii): Clun; S2.2(iv): Lydbury North; S2.2 (vi) Abcot, Beckjay, Clungunford, Hopton Heath, Shelderton and Twitchen (Three Ashes), and; S2.3 Area wide policies and other allocations
- S7.2(i) Aston on Clun, Hopesay, Broome, Horderley, Beambridge Long Meadow End, Rowton, Round Oak (Craven Arms area)
- S8: Ellesmere Area including Land South of Ellesmere (ELL003a) and Land South of Ellesmere (ELL003b)
- S8.3: Area-wide Policies and Other Allocation (Ellesmere area)
- S17: Wem Area
- S18: Whitchurch Area

In the majority of cases we consider that the policies can be made to be legally compliant and sound through minor modifications which we have proposed.

In several cases we have recommended that further detail provided in the Habitats Regulations Assessment (HRA) is included within the SAMDev Plan, to provide clarity to developers. This applies to the policies relating to minerals allocations around Ellesmere, the housing allocations in the Ellesmere and Whitchurch areas and to development in the Clun catchment. With regard to development in the Clun catchment, we advise that if the Local Planning Authority (LPA) is unable to include sufficient detail in the SAMDev Plan at the current stage of the Nutrient Management Plan's evolution, then it should set out a clear process for when and where this detail will become available, such as through a Supplementary Planning Document.

We have raised significant concerns in relation to allocations ELL003a and ELL003b, Land South of Ellesmere. The HRA of the SAMDev Plan raises concerns regarding potential impacts from increased recreational pressure as a result of housing allocations near to Cole Mere and White Mere, which are part of the Midlands Meres and Mosses Ramsar site. We are concerned that the HRA undertaken to inform the SAMDev Plan is insufficient, and that the Habitats Regulations requirements are being inappropriately pushed down to the project stage. We advise that further HRA work should be undertaken to inform the SAMDev Plan in advance of the Examination. We would be happy to discuss this further with the LPA.

We also question whether a robust case has been made showing that the local green space provision proposed as mitigation for allocations south of Ellesmere and in the Whitchurch area would be the most appropriate and cost effective means of safeguarding Natura 2000 sites against recreational impacts. Natural England would welcome further discussion with the LPA on this issue in order to discuss the existing evidence base and potential solutions in advance of Examination.

In all cases we would be happy to discuss our recommendations further with the LPA, with a view to resolving issues before the Examination.

MD5: Sites for sand and gravel working
MD5a: Phase 1 site allocations
Wood Lane North extension (Ellesmere)

Is your representation in support or objection?

Objection

In respect of your representation on the policy, paragraph or section of the Policies Map, do you consider the SAMDev Plan is:

Legally compliant

Sound

No; it is Natural England's view that the policy is not sound

If your representation considers the SAMDev Plan is not sound, please say whether this is because it is not:

- **Positively prepared**
- **Justified**
- **Effective**
- **Consistent with National Policy**

The policy is not currently effective, however we have suggested additional policy wording to ensure the policy is sound with respect to impacts on Natura 2000 sites.

In the box below please specify your reason for supporting or objecting. If you are objecting, you should make clear why the document is unsound having regard to the issues of ‘legal compliance’ or whether the document is not positively prepared, justified, effective or not consistent with national policy (Continue on a separate sheet if necessary).

Natural England advises that the policy and/or its supporting text should be amended to ensure recommendations in the Habitats Regulations Assessment are incorporated into the SAMDev Plan to ensure it is effective.

Please use the box below to explain the changes you think should be made to the SAMDev Plan in order to make it legally compliant or sound? You should explain your suggested revisions to the policy, paragraph or section of the Policies Map, and why this change would make the plan legally compliant or sound. Please be as precise as possible (Continue on a separate sheet if necessary)

The wording of point 1 should be changed to make it clear that Habitats Regulations Assessment (HRA) assesses impacts on Natura 2000 sites and their features of interest only, and not nationally designated wildlife sites as is currently implied. However, we welcome the requirement that permission cannot be granted if there will be an adverse impact on any protected site.

The HRA of the Minerals Allocations identifies the Natura 2000 sites which could be impacted and explains the nature of these potential effects. White Mere could be impacted by dust, and Colemere could be impacted by dust, by hydrological changes impacting ground or surface water or by pollution affecting water quality. The HRA recommends that *“detailed information and analysis of water movements, and stringent mitigation management plans will be required at the planning application stage to remove any adverse impacts from dust, sediment and changes in water levels or quality”* (5.3). As this information is known we recommend that it is provided within the SAMDev Plan, either within the policy itself or the explanatory text. This would ensure the policies compliance with the Habitats Regulations and assist developers in its application, therefore ensuring its effectiveness.

We welcome the requirement for site restoration to deliver “significant wildlife and recreation benefits” in relation to Wood Lane North (point 6) and Gonsall (point 4). It is not clear why this hasn’t been included in relation to the Morville Extension and we would welcome it if this could be rectified.

MD12: The Natural Environment

Is your representation in support or objection?

Objection

In respect of your representation on the policy, paragraph or section of the Policies Map, do you consider the SAMDev Plan is:

Legally compliant

Sound

No; it is Natural England’s view that the policy is not sound

If your representation considers the SAMDev Plan is not sound, please say whether this is because it is not:

- **Positively prepared**
- **Justified**

- **Effective**
- **Consistent with National Policy**

The policy is not consistent with National Policy

In the box below please specify your reason for supporting or objecting. If you are objecting, you should make clear why the document is unsound having regard to the issues of 'legal compliance' or whether the document is not positively prepared, justified, effective or not consistent with national policy (Continue on a separate sheet if necessary).

Please use the box below to explain the changes you think should be made to the SAMDev Plan in order to make it legally compliant or sound? You should explain your suggested revisions to the policy, paragraph or section of the Policies Map, and why this change would make the plan legally compliant or sound. Please be as precise as possible (Continue on a separate sheet if necessary)

Natural England welcomes the inclusion of this policy. However, we recommend changes to improve its consistency with national policy.

The current wording is as follows:

...the conservation, enhancement and restoration of Shropshire's natural assets will be achieved by:

1. Ensuring that the social or economic benefits of development can be demonstrated to clearly outweigh the harm to natural assets where proposals are likely to have an unavoidable significant adverse effect, directly, indirectly or cumulatively, on any of the following:

- i. the special qualities of the Shropshire Hills AONB;*
- ii. locally designated biodiversity and geological sites;*
- iii. priority species;*
- iv. priority habitats*
- v. important woodlands, trees and hedges;*
- vi. ecological networks*
- vii. geological assets;*
- viii. visual amenity;*
- ix. landscape character and local distinctiveness.*

In these circumstances a hierarchy of mitigation then compensation measures will be sought.

We are concerned that the current wording could be misconstrued as implying that social or economic benefits 'out rank' environmental concerns.

The policy does not make it clear enough that planning permission would be refused if significant harm cannot be avoided, mitigated or, as a last resort, compensated. We recommend that policy MD12 is amended to include a stronger 'bottom line', where applications would be refused if significant harm cannot be avoided. This would give improved compliance with the National Planning Policy Framework (NPPF), which makes it clear that, in relation to biodiversity, applications should be refused if significant harm can't be avoided, mitigated or, as a last resort, compensated for (paragraph 118).

We recommend effectively switching the policy around, to cover the mitigation hierarchy first before establishing that if there are unavoidable or residual impacts, there must be a clear economic or

social benefits which outweigh the environmental impacts. The policy should make it clear that any adverse impacts on the assets listed must be avoided, mitigated or, as a last result compensated for, and that development which results in unavoidable harm would only be allowed in exceptional circumstances and where there is demonstrable social or economic benefits which clearly outweigh the harm.

We welcome the clarification of the mitigation hierarchy in paragraph 4.116 of the explanatory text. The NPPF intends to deliver a net gain for nature (paragraphs 9, 109 and 152). We would therefore welcome it if mitigation and compensation proposals were required to deliver net gains, rather than being merely 'adequate' (4.116 point iii).

We note that the policy does not cover soils or the best and most versatile agricultural land, and that these subjects are not covered elsewhere in the SAMDev Plan. Soils should be valued as a finite multi-functional resource which underpin our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.

The NPPF states in paragraph 109 that the planning system should contribute to and enhance the natural and local environment by *"protecting and enhancing ... soils"*, and, in paragraph 112, that local planning authorities should *"take into account the economic and other benefits of the best and most versatile agricultural land"*.

Plan policies should take account of the impact on land and soil resources and the wide range of vital functions (ecosystem services) they provide in line with paragraph 17 of the NPPF, for example to:

- Safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future.
- To avoid development that would disturb or damage other soils of high environmental value (e.g. wetland and other specific soils contributing to ecological connectivity, carbon stores such as peatlands etc) and, where development is proposed.
- Ensure soil resources are conserved and managed in a sustainable way.

Some of the most significant impacts on soils occur as a result of activities associated with construction activity. A Code of Practice has been developed by Defra to assist anyone involved in the construction sector to better protect the soil resources with which they work and in doing so minimise the risk of environmental harm such as excessive run-off and flooding. The aim is to achieve positive outcomes such as cost savings, successful landscaping and enhanced amenity whilst maintaining a healthy natural environment. 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/>

The LPA should satisfy itself that soils have been adequately covered elsewhere in the Local Plan, or consider adding soils into SAMDev policy MD12. We consider that this would improve the delivery of Sustainability Objective 17: Protect and improve soil quality and soil retention.

S2: Bishop's Castle Area and associated policies including **S2.2(i): Bucknell**, **S2.2(iii): Clun**, **S2.2(iv): Lydbury North**, **S2.2 (vi) Abcot, Beckjay, Clungunford, Hopton Heath, Shelderton and Twitchen (Three Ashes)**, and in particular **S2.3 Area wide policies and other allocations**

Is your representation in support or objection?

Objection

In respect of your representation on the policy, paragraph or section of the Policies Map, do you consider the SAMDev Plan is:

Legally compliant

Sound

No; it is Natural England's view that the policy is not legally compliant or sound

If your representation considers the SAMDev Plan is not sound, please say whether this is because it is not:

- **Positively prepared**
- **Justified**
- **Effective**
- **Consistent with National Policy**

It is our view that this collection of policies is not legally compliant, effective or consistent with National Policy; however we have suggested additional policy wording to ensure the policy is sound with respect to impacts on Natura 2000 sites.

In the box below please specify your reason for supporting or objecting. If you are objecting, you should make clear why the document is unsound having regard to the issues of 'legal compliance' or whether the document is not positively prepared, justified, effective or not consistent with national policy (Continue on a separate sheet if necessary).

Please use the box below to explain the changes you think should be made to the SAMDev Plan in order to make it legally compliant or sound? You should explain your suggested revisions to the policy, paragraph or section of the Policies Map, and why this change would make the plan legally compliant or sound. Please be as precise as possible (Continue on a separate sheet if necessary)

Whilst we very much welcome the recognition of the water quality issues in the River Clun SAC and the ongoing partnership work to produce a Nutrient Management Plan, it is our view that the policy is insufficiently detailed and therefore is not effective. On these grounds we would also question its compliance with the Habitats Regulations.

The HRA for the SAMDev Plan sets out in some detail the potential measures being considered to reduce the nutrient loading of the River Clun (paragraph 5.3.1). This includes diverting treated effluent from Bishop's Castle and Bucknell Sewage Treatment Works out of the Clun catchment. If this measure is being actively considered then it is our view that it should be referred to in the policy or the supporting text.

The HRA goes on to state that while small developments might be permissible now, housing allocations will need to be phased in line with infrastructure modifications expected to be included in the current AMP round (2015-2019). While policy "S2.3 Area wide policies and other allocations" does mention phasing, it is our view that the policy steer is not strong enough. If the LPA knows which developments will need to be backloaded within the SAMDev Plan timeframe, then this information should be included within the plan policies or supporting text.

If it is not currently possible to include the recommended level of detail in the SAMDev Plan due to the stage of the Nutrient Management Plan work, then the SAMDev must set out when this information will become available and how it will be integrated into the plan. For example, it may be necessary to produce a River Clun SAC Supplementary Planning Document. The SAMDev Plan policies could then refer to this forthcoming further guidance.

S7.2(i) Aston on Clun, Hopesay, Broome, Horderley, Beambridge Long Meadow End, Rowton, Round Oak (Craven Arms area)

Is your representation in support or objection?

Objection

In respect of your representation on the policy, paragraph or section of the Policies Map, do you consider the SAMDev Plan is:

Legally compliant

Sound

No; it is Natural England's view that the policy is not legally compliant or sound

If your representation considers the SAMDev Plan is not sound, please say whether this is because it is not:

- **Positively prepared**
- **Justified**
- **Effective**
- **Consistent with National Policy**

It is our view that this collection of policies is not legally compliant, effective or consistent with National Policy.

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Please use the box below to explain the changes you think should be made to the SAMDev Plan in order to make it legally compliant or sound? You should explain your suggested revisions to the policy, paragraph or section of the Policies Map, and why this change would make the plan legally compliant or sound. Please be as precise as possible (Continue on a separate sheet if necessary)

We welcome the recognition that some of the western parts of this area are within the catchment of the River Clun SAC. We recommend the inclusion of further detail regarding what types of mitigation might be required and the phasing of development. This would improve the policies compliance with the Habitats Regulations and assist developers in its application, therefore improving its effectiveness.

If it is not currently possible to include the recommended level of detail in the SAMDev Plan due to the stage of the Nutrient Management Plan work, then the SAMDev must set out when this information will become available and how it will be integrated into the plan. For example, it may be necessary to produce a River Clun SAC Supplementary Planning Document, which the SAMDev Plan should then refer to.

S8: Ellesmere Area including Land South of Ellesmere (ELL003a) and Land South of Ellesmere (ELL003b)

Is your representation in support or objection?

Objection

In respect of your representation on the policy, paragraph or section of the Policies Map, do you consider the SAMDev Plan is:

Legally compliant

Sound

No; it is Natural England's view that the policy is not legally compliant or sound

If your representation considers the SAMDev Plan is not sound, please say whether this is because it is not:

- **Positively prepared**
- **Justified**
- **Effective**
- **Consistent with National Policy**

It is our view that this collection of policies is not legally compliant, effective or consistent with National Policy.

In the box below please specify your reason for supporting or objecting. If you are objecting, you should make clear why the document is unsound having regard to the issues of 'legal compliance' or whether the document is not positively prepared, justified, effective or not consistent with national policy (Continue on a separate sheet if necessary).

Please use the box below to explain the changes you think should be made to the SAMDev Plan in order to make it legally compliant or sound? You should explain your suggested revisions to the policy, paragraph or section of the Policies Map, and why this change would make the plan legally compliant or sound. Please be as precise as possible (Continue on a separate sheet if necessary)

Natural England is concerned that the Habitats Regulations Assessment undertaken to inform the SAMDev Plan is insufficient, and that the Habitats Regulations requirements are being inappropriately pushed down to the project stage.

The HRA of the SAMDev Plan raises concerns regarding potential impacts from increased recreational pressure as a result of housing allocations near to Cole Mere and White Mere, which are part of the Midlands Meres and Mosses Ramsar site.

The protective regime of the Directive is intended to operate at differing levels. In some circumstances assessment 'down the line' will be more effective in assessing the potential effects of a proposal on a particular site and protecting its integrity. However, three tests should be applied to determine when this is appropriate. It will be appropriate to consider relying on the HRA of lower tier plans or projects (e.g. planning applications), in order for a LPA to ascertain a higher tier plan would not have an adverse effect on the integrity of a European site, only where:

A] The higher tier plan assessment cannot reasonably assess the effects on a European site in a meaningful way; whereas

B] The Habitats Regulations Assessment of the lower tier plan, which will identify more precisely the nature, scale or location of development, and thus its potential effects, will be able to change the proposal if an adverse effect on site integrity cannot be ruled out, because the lower tier plan is free to change the nature and/or scale and/or location of the proposal in order to avoid adverse effects on the integrity of any European site (e.g it is not constrained by location specific policies in a higher tier plan); and

C] The Habitats Regulations Assessment of the plan or project at the lower tier is required as a matter of law or Government policy.

In this case we advise that the HRA is most appropriately undertaken at the Plan stage. The nature, scale and location of development is clear. It is reasonable for the proposed assessment of predicted increases in visitor numbers and their significance to be assessed at the Plan stage. If

impacts are found to be significant then it is possible that a strategic solution would be required. The Plan could then give a clearer steer on the mitigation which development proposals need to deliver.

The HRA of the SAMDev Plan recommends mitigation through local greenspace provision and/or contributions to visitor management within the Ramsar sites. The effectiveness of these suggested options has not been assessed and there is no clear decision about which route to take, making it difficult for developers to understand what is required of them. The effectiveness of the possible mitigation options cannot be assessed until the scale and significance of the increases in visitor numbers is understood. It is Natural England's view that it would be more appropriate to undertake this assessment at Plan stage as it is possible that a strategic solution could be required, such as the provision of a country park and/or contributions to visitor management referred to in relation to ELL003a. It would not be possible to deliver mitigation of this nature through a single planning proposal, instead, such strategic solutions would need to be implemented through SAMDev Plan policies. Any financial contributions required would also need to be clearly set out at a Plan level.

The HRA suggests that local greenspace provision in line with the authority-wide standard of 30m² per person could form part of the mitigation. Given the exceptional circumstance of needing to mitigate for increased recreational pressure on Ramsar sites, we would suggest that greenspace provision may need to be above this baseline. A robust case has not yet been made to show that green space provision would be the most appropriate and cost effective means of safeguarding Cold Mere and White Mere against recreational impacts. It may be more appropriate to consider the on-site mitigation techniques in further detail and Natural England would welcome further detail on the contributions to visitor management referred to in ELL003a. Natural England is happy to offer further advice on this matter and work with the LPA prior to Examination.

S8.3: Area-wide Policies and Other Allocation (Ellesmere area)

Is your representation in support or objection?

Objection

In respect of your representation on the policy, paragraph or section of the Policies Map, do you consider the SAMDev Plan is:

Legally compliant

Sound

No; it is Natural England's view that the policy is not sound

If your representation considers the SAMDev Plan is not sound, please say whether this is because it is not:

- **Positively prepared**
- **Justified**
- **Effective**
- **Consistent with National Policy**

The policy is current not effective, however we have recommended modifications to ensure compliance with recommendations of the Habitats Regulations Assessment.

In the box below please specify your reason for supporting or objecting. If you are objecting, you should make clear why the document is unsound having regard to the issues of 'legal compliance' or whether the document is not positively prepared, justified, effective or not consistent with national policy (Continue on a separate sheet if necessary).

The policy should be amended to ensure conclusions of the Habitats Regulations Assessment are properly incorporated into the SAMDev Plan to ensure its effectiveness.

Please use the box below to explain the changes you think should be made to the SAMDev Plan in order to make it legally compliant or sound? You should explain your suggested revisions to the policy, paragraph or section of the Policies Map, and why this change would make the plan legally compliant or sound. Please be as precise as possible (Continue on a separate sheet if necessary)

We recommend that the LPA considers specifying that the minerals workings should avoid extraction below the water table, in order to avoid impacts on Natura 2000 sites.

Schedule S12a: Housing Sites and Mixed Use allocations

Is your representation in support or objection?

Support

In respect of your representation on the policy, paragraph or section of the Policies Map, do you consider the SAMDev Plan is:

Legally compliant

Sound

If your representation considers the SAMDev Plan is not sound, please say whether this is because it is not:

- Positively prepared
- Justified
- Effective
- Consistent with National Policy

In the box below please specify your reason for supporting or objecting. If you are objecting, you should make clear why the document is unsound having regard to the issues of 'legal compliance' or whether the document is not positively prepared, justified, effective or not consistent with national policy (Continue on a separate sheet if necessary).

We welcome the requirement for development at MIN007 Callow Lane Minsterley to incorporate a buffer zone to the eastern boundary, appropriate landscaping and any other mitigation measures required to safeguard the adjoining Minsterley Meadows SSSI.

We would welcome it if the proposed buffer zone could include the creation of Priority habitat, contributing towards national and local targets.

Please use the box below to explain the changes you think should be made to the SAMDev Plan in order to make it legally compliant or sound? You should explain your suggested revisions to the policy, paragraph or section of the Policies Map, and why this change would make the plan legally compliant or sound. Please be as precise as possible (Continue on a separate sheet if necessary)

S17: Wem Area

Is your representation in support or objection?

Objection

In respect of your representation on the policy, paragraph or section of the Policies Map, do you consider the SAMDev Plan is:

Legally compliant

Sound

No; it is Natural England's view that the policy is not legally compliant or sound

If your representation considers the SAMDev Plan is not sound, please say whether this is because it is not:

- **Positively prepared**
- **Justified**
- **Effective**
- **Consistent with National Policy**

It is our view that the policy is not legally compliant or consistent with National Policy

In the box below please specify your reason for supporting or objecting. If you are objecting, you should make clear why the document is unsound having regard to the issues of 'legal compliance' or whether the document is not positively prepared, justified, effective or not consistent with national policy (Continue on a separate sheet if necessary).

Please use the box below to explain the changes you think should be made to the SAMDev Plan in order to make it legally compliant or sound? You should explain your suggested revisions to the policy, paragraph or section of the Policies Map, and why this change would make the plan legally compliant or sound. Please be as precise as possible (Continue on a separate sheet if necessary)

It is Natural England's view that the policy is not compliant with the Habitats Regulations, because the wording changes recommended in the HRA have not been implemented. The recommendations are made in section 5.3.5 of the HRA and should be incorporated into the SAMDev Plan to ensure policies are effective.

S18: Whitchurch Area

Is your representation in support or objection?

Objection

In respect of your representation on the policy, paragraph or section of the Policies Map, do you consider the SAMDev Plan is:

Legally compliant

Sound

No; it is Natural England's view that the policy is not legally compliant or sound

If your representation considers the SAMDev Plan is not sound, please say whether this is because it is not:

- **Positively prepared**
- **Justified**
- **Effective**
- **Consistent with National Policy**

It is our view that the policy is not legally compliant or consistent with National Policy

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In the box below please specify your reason for supporting or objecting. If you are objecting, you should make clear why the document is unsound having regard to the issues of 'legal compliance' or whether the document is not positively prepared, justified, effective or not consistent with national policy (Continue on a separate sheet if necessary).

Please use the box below to explain the changes you think should be made to the SAMDev Plan in order to make it legally compliant or sound? You should explain your suggested revisions to the policy, paragraph or section of the Policies Map, and why this change would make the plan legally compliant or sound. Please be as precise as possible (Continue on a separate sheet if necessary)

The HRA for the SAMDev Plan recommends greenspace provision as mitigation for potential recreational impacts on Brown Moss SAC/Ramsar (5.3.6). We recommend specifying this within the SAMDev policy or its explanatory text. This would improve the policies compliance with the Habitats Regulations and assist developers in its application, therefore improving its effectiveness.

The HRA suggests local greenspace provision in line with the authority-wide standard of 30m² per person. Given the exceptional circumstance of needing to mitigate for increased recreational pressure on a Natura 2000 site, we would suggest that greenspace provision may need to be above this baseline. Furthermore, as with our comments in relation to recreational impacts on Cold Mere and White Mere, Natural England advises that a robust case has not yet been made to show that green space provision would be the most appropriate and cost effective means of safeguarding Natura 2000 sites against recreational impacts. Natural England would welcome further discussion with the LPA on this issue in order to discuss the existing evidence base and potential solutions in advance of Examination.

We hope that this response is of use and look forward to further discussions in advance of the SAMDev Plan Examination.

For any queries relating to the specific advice in this letter only please contact Hayley Fleming on 0300 060 1594. 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 faithfully

Zoë Buddle
Senior Adviser
Development Plans Network
Sustainable Development Team