

Thank you for your consultation on the preferred options consultation. This email provides a response to this and a summary of the issues discussed in our meeting on Wednesday 17 February.

It is my understanding that Natural England's comment is required to assist the authority in testing the viability of the preferred options to address the unmet housing need of the Borough and the wider Housing Market Area. As a result I have provided information to inform the evidence base for the options detailed in the plan and assessed in the Sustainability Appraisal. I have also provided any points of advice on policy development focused in particular on topics within Natural England's remit.

Habitat Regulations Assessment

I understand that a Habitat Regulations Screening assessment is to be undertaken further down the line, considering any indirect impacts on internationally designated sites. As we discussed at our meeting surveys of Ensor's Pool in Nuneaton (most recently in September 2015) have failed to find the white clawed crayfish for which the site is designated as a Special Area of Conservation (SAC).

A survey in September 2012 caught 262 crayfish however surveys for white clawed crayfish carried out in September 2014 (trapping survey), October 2014 (Dive survey), June – September 2015 (Bioassay) and September 2015 (trapping survey) caught no crayfish. Based on the survey evidence, Natural England has concluded that the population of native white-clawed crayfish is no longer present. Natural England is now working with Defra on the way forward for the SAC series and NE's duty to provide advice to planning authorities on matters relating to protected sites.

Housing Allocations – Preferred Options

Rugby Urban and Coventry edge proposed allocations

Rugby South West – the following sites and environmental features to be considered for this site:

- Draycote Meadows Site of Special Scientific Interest (SSSI) falls within 3km to the south west of the site. This SSSI is a water dependent site with water quality sensitivities. Natural England would expect the impacts on this site to be fully considered and evidenced.
- The western part of this site appears to include areas of Grade 2 and Grade 3a Best Most Versatile land. Natural England advises the Authority ensures information on agricultural land classification is adequately referenced in the evidence base to support the recommendation of focus areas for growth and to ensure the Local Plan is fully NPPF compliant.
- The site includes an area of ancient and semi-natural woodland. Section 118 of the [National Planning Policy Framework](#) states:

“planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss”.

We note the reference to ancient woodland as a key asset in the Green Infrastructure Study. Natural England has produced [standing advice](#) with the Forestry Commission on Ancient Woodland.

Coton Park East - the following sites and environmental features to be considered for this site:

- Cave Inn Pitts SSSI falls within 2km to the north east of the site. This SSSI is a water dependent site with water and air quality sensitivities. Natural England would expect the impacts on this site to be fully considered and evidenced.
- Parts of this site appear to include areas of Grade 2 and Grade 3a Best Most Versatile land. Natural England advises the Authority ensures information on agricultural land classification is adequately referenced in the evidence base to support the recommendation of focus areas for growth and to ensure the Local Plan is fully NPPF compliant.

Land South of Walsgrave Hill Farm - the following sites and environmental features to be considered for this site:

- Combe Pools SSSI is directly adjacent to this proposed site. This SSSI is notified for breeding birds and as a Country Park has managed access. The Sustainability Appraisal in support of this iteration of the plan acknowledges potential adverse effects from development in close proximity to designated sites (4.83). Natural England advises that further detail specific to this site is required in the Appraisal for the consideration of this proposed allocation in line with this statement.
- A significant part of this site appears to include areas of Grade 2 and Grade 3a Best Most Versatile land. Natural England advises the Authority ensures information on agricultural land classification is adequately referenced in the evidence base to support the recommendation of focus areas for growth and to ensure the Local Plan is fully NPPF compliant.

Main Rural Settlements proposed allocations

Proposed allocations to the south west of the plan area (Ryton on Dunsmore, Stretton on Dunsmore, Binley Woods and Wolston fall in close proximity to the following designated sites:

Binley Woods SSSI
Brandon Marsh SSSI
Ryton and Brandon Gravel Pitts SSSI
Wolston Gravel Pitts SSSI

Natural England would advise clearer information to evidence the consideration of these designations.

Local Plan Policy – Comments and Feedback

Policy NE3 Green Infrastructure Policy

Natural England is supportive of a Green infrastructure Policy based on an evidenced understanding of the Green Infrastructure assets in the Borough. We support a strategic approach to GI in line with paragraph 114 of the National Policy planning Framework (NPPF).

However this policy as it currently stands does not enable the authority to capture GI opportunities at all scales. GI can encompass both new and existing sites in urban, urban-fringe and rural locations. From the smallest garden to an entire river or transport corridor GI

exists at all scales within and across our town and rural landscapes. Natural England would encourage the inclusion of drivers within this policy to encourage GI delivery in all development as a part of wider strategic approach.

The Green Infrastructure Study included in the evidence base for this plan was produced in 2009 and as a result is likely to need updating to support the future strategic direction of GI in the Borough. Natural England would wish to be engaged with this work as it moves forward.

I also note that as a part of the preferred options proposed a number of parcel of land are being considered for removal from the Green Belt. The Government has provided general guidance on Green Belt [here](#). Natural England will provide comment on proposals where there is a potential impact on designated nature conservation sites and protected landscapes.

Policy HS4: Open Space and Recreation

In Natural England's response to the Local Plan Discussion Document (ref 90911) Natural England made detailed comment on open space policies including the following:

'Natural England suggest that open space ought to be multi-functional as set out in our Green Infrastructure Guidance and also assist in promoting access to nature where uses are compatible'.

I advise reference is made to GI and or the GI Policy within this particular policy to ensure the links between the two are clear.

I hope this is useful in response to your consultation at this stage. Please contact me if you would like to discuss any of the point raised above further.

Kind Regards

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