

**Shropshire Council Local Plan
2016 -2038**

Statement of Common Ground between

**Natural England and
Shropshire Council**

September 2021

Contents

1. Introduction	3
2. Background	3
3. NE Regulation 19 response: overview	3
4. The Draft Shropshire Local Plan: General	4
5. Habitats Regulations Assessment: General	4
6. The Draft Shropshire Local Plan: Specific issues.....	4
6.1. Correct housing numbers and employment land figures.....	4
6.2. HRA: fish species.....	5
6.3. Policy DP13 – unintended consequences.....	6
6.4. Allocated sites BKL008a and CLU005 and Policy DP13: Development in the Clun catchment.....	6
7. Formal approval	11
Appendix A: Natural England response to the Regulation 19 Pre-submission Draft Shropshire Local Plan.....	12
Appendix B: Minutes of NE-SC liaison meeting 05.05.21.....	13
Appendix C: NE-EA Joint Advisory Position on the Clun catchment 23.07.21	19

1. Introduction

- 1.1. This Statement of Common Ground has been prepared jointly between Shropshire Council (SC) and Natural England (NE). It sets out the response from SC to the representation made by NE to the Regulation 19 Pre-Submission Draft Shropshire Local Plan consultation. It clarifies where issues have been resolved and where they remain unresolved.

2. Background

- 2.1. The current Local Plan for Shropshire comprises the Core Strategy (2011) and the Site Allocations and Management of Development document (2015), together with any adopted formal Neighbourhood Plans. These documents allocate land for employment and housing and set out development management policies for the period 2006-2026.
- 2.2. Local Planning Authorities are required to keep under review, any matters that might affect the development of their area. Changes to numbers of houses needed in Shropshire and to national planning policy mean that the Council is now updating the Local Plan.
- 2.3. The Draft Shropshire Local Plan covers the period 2016-2038 and has been prepared in several iterative stages:
 - Issues and Options;
 - Preferred Scale and Distribution of Development:
 - Preferred Sites;
 - Preferred Strategic Sites:
 - Regulation 18 Pre-Submission Draft
 - Regulation 19 Pre-Submission Draft.
- 2.4. Each of these stages was subject to public consultation and comments were received from NE as a statutory consultee. The Regulation 19 response (Appendix A) forms the basis for this Statement of Common Ground and is discussed in greater detail in section 3 onwards.

3. NE Regulation 19 response: overview

- 3.1. The following sections summarise the points raised in NE's representation and set out:
 - a) where both parties have reached agreement; and
 - b) those issues where disagreement remains.
- 3.2. NE and SC met on 5th May 2021 and the minutes of this meeting are attached as Appendix B.
- 3.3. NE also commented on a draft of this SoCG and these additional comments are included under the heading of NE further comments where relevant.
- 3.4. Finally, NE and the Environment Agency (EA) prepared an NE-EA Joint Advisory Position on the Clun catchment 23.07.21 document. This is included as Appendix C.

4. The Draft Shropshire Local Plan: General

- 4.1. NE considers the Draft Shropshire Local Plan to be largely sound and positively prepared. They confirm that they have been involved in discussions on a number of topics, including the HRA, as the Plan has emerged. NE do not explicitly cover the issue of legal compliance, although they state that the Council may want to take legal advice with respect to Policy DP13. This issue is covered in section 6.4 below.
- 4.2. NE support the following:
- The Draft Shropshire Local Plan's vision and strategy
 - Strategic approach
 - Policy SP3 Climate Change
 - Policy DP12 The Natural Environment
 - The explanation of Policy DP13
 - Policy DP14 Green Infrastructure
 - Policy DP18 Pollution and Public Amenity
 - Policy DP24 The Shropshire Hills Area of Outstanding Natural Beauty
- 4.3. NE also recognise that the Draft Shropshire Local Plan has allocated sites with the least environmental value (with the exception of sites within the river Clun catchment).

5. Habitats Regulations Assessment: General

- 5.1. NE agree with the conclusions of the HRA for the Draft Shropshire Local Plan, with the exception of those relating to the River Clun Special Area of Conservation (SAC).

6. The Draft Shropshire Local Plan: Specific issues.

6.1. Correct housing numbers and employment land figures

NE comment:

- 6.1.1. On page 33 of the HRA (Table 3: Water impact pathways to international sites) 232 dwellings are proposed in the Clun catchment, whereas on page 63 (Appropriate Assessment paragraph 3.27) 319 are proposed.

SC's response

- 6.1.2. The calculation of housing numbers is complicated because the timescale for the Draft Shropshire Local Plan overlaps with the adopted SAMDev Plan, whilst at the same time, only some of the development from the SAMDev Plan has taken place. The relationship between these factors and housing numbers and (for the sake of completeness and clarity) the employment land situation, is explained below.
- 6.1.3. Three settlements within the river Clun Catchment have residential guidelines in the Draft Shropshire Local Plan: Bishop's Castle (Key Centre), Bucknell (Community Hub) and Clun (Community Hub). The guidelines for these three settlements propose that a total 355 of dwellings will be delivered between 2016 and 2038 (150 in Bishop's Castle, 110 in Bucknell and 95 in Clun).
- 6.1.4. The SAMDev Plan residential guidelines for the three Clun catchment settlements total some 320 dwellings. These are to be delivered between 2006 and 2026 (150 in Bishop's Castle, 100 in Bucknell and 70 in Clun). Of these 320, 81 were delivered prior to 2016 (76 in Bishop's Castle, 2 in Bucknell and 3 in Clun). As such, the remaining SAMDev residential guidelines (to be delivered between 2016 and 2026) for these three settlements, total 239 dwellings (74 in Bishop's Castle, 98 in Bucknell and 67 in

Clun). The Draft Shropshire Local Plan then proposes that an additional 116 dwellings (355 – 239) across these three settlements (76 in Bishop's Castle, 12 in Bucknell and 28 in Clun) are delivered between 2016 and 2038.

6.1.5. The Draft Shropshire Local Plan proposes that the combined residential guidelines for these three settlements (355) will be achieved through a combination of:

- the 18 dwellings completed between 2016/17 and 2018/19 (8 in Bishop's Castle, 5 in Bucknell and 5 in Clun);
- the 71 dwellings with planning permission or Prior Approval as at 31st March 2019 (62 in Bishop's Castle, 7 in Bucknell and 2 in Clun);
- 170 dwellings on those SAMDev Plan allocations without planning permission as at 31st March 2019 (40 in Bishop's Castle, 70 in Bucknell and 60 in Clun);
- 40 dwellings on the proposed allocation sites in the Draft Shropshire Local Plan (20 in Bucknell and 20 in Clun); and
- 56 dwellings proposed through windfall in the Draft Shropshire Local Plan (40 in Bishop's Castle, 8 in Bucknell and 8 in Clun).

6.1.6. Of these, only the 96 dwellings on the Draft Shropshire Local Plan proposed allocation sites and the windfall allowances (40 and 56 respectively) represent 'new supply'. Housing completions, sites with planning permission or Prior Approval and SAMDev Plan allocations are established sources of housing land.

6.1.7. Of the settlements in the Clun catchment only Bishop's Castle has an employment land guideline (of 3ha). It is proposed that this will be achieved through a combination of:

- 2.8 ha on the saved SAMDev employment allocation, of which 1ha has been built and 1.8h has planning permission.
- 0.2ha through windfall

6.1.8. It is also noted that the saved SAMDev employment allocation in Bishop's Castle has a capacity of 3.8ha but that 1ha of this has been used for the provision of open space.

6.1.9. In addition, the Draft Shropshire Local Plan is proposing to save 1.6 ha of employment land in Bucknell, of which 0.2 is already built.

Natural England is satisfied by this clarification

6.2. HRA: fish species

NE comment:

6.2.1. Although the HRA Appropriate Assessment acknowledges that the river is important for salmon and trout, it does not mention that these fish species are essential to the life cycle of the freshwater pearl mussels as the juvenile mussels are encysted within the gills of the fish.

SC's response

6.2.2. A minor modification to the HRA Appropriate Assessment is proposed to include reference to the importance of salmonids in the life-cycle of the Freshwater Pearl Mussel. However, the Council feels that this does not change the conclusion of the Appropriate Assessment for the River Clun SAC.

Agreement reached with regard to fish species

6.3. Policy DP13 – unintended consequences

NE comment:

- 6.3.1. The nutrient neutrality aspect of Policy DP13 may have unintended consequences because if a landowner was planning to apply for planning permission in future, they could spend the preceding years applying higher levels of fertiliser in order to reduce the requirements for mitigation when it becomes time to submit a planning application.

SC's response

- 6.3.2. The Council does not control the use of land before a planning application is submitted so this concern cannot be addressed by the planning process.

NE further comment

- 6.3.3. NE agrees that the LPA does not control the use of land before a planning application which is why the policy wording and associated explanation must be sufficiently robust. Natural England considers a way forward may include reference to a baseline i.e. nutrient neutrality proposals are based on what is required for the restoration of the River Clun SAC rather than the existing situation or based on what applicants say they have been putting on their land. At present there is a lack of evidence about what the restoration of the SAC requires in practice.

Agreement not reached

6.4. Allocated sites BKL008a and CLU005 and Policy DP13: Development in the Clun catchment.

6.4.1. Summary of NE comments

- i) It may be premature to include the site allocations in the Clun catchment in the Draft Shropshire Local Plan at this point as the land may be needed for restoration measures for the SAC.
- ii) The allocations are not deliverable because more work is needed to identify SAC restoration measures.
- iii) There is not enough certainty on what measures are required to meet the nutrient neutrality test in policy DP13. This is supported by the fact that no acceptable nutrient neutrality schemes for the river Clun SAC have been designed yet despite longstanding planning applications.
- iv) Policy DP13 and the site allocations are not compatible with the Dutch Nitrogen Judgement (although the Council may want to seek its own legal advice).
- v) Even if development produces less nutrients than agriculture, it could still contribute to SAC failure through in combination effects.

SC's response

- 6.4.2. The Council proposes to make minor modifications to Policy DP13 The Clun Catchment, and the explanatory text as follows (additional text is in **bold** and underlined and deleted text is indicated by a ~~strikethrough~~):

DP13 Development in the River Clun Catchment

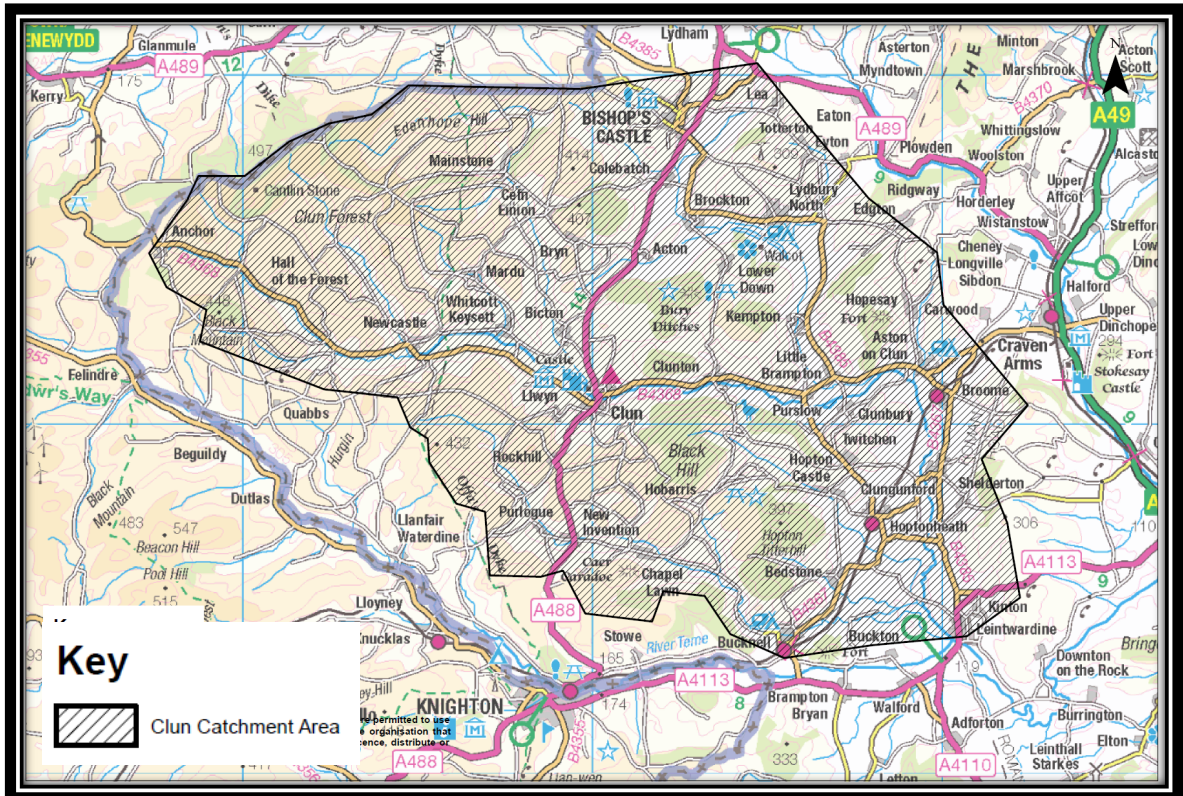
1. To protect the integrity of the ~~r~~**R**iver Clun Special Area of Conservation (**SAC**) and to comply with the Habitats Regulations and policy DP12, development within the catchment of the ~~r~~**R**iver Clun will only be permitted if it can demonstrate either nutrient neutrality or **a reduction in** nutrient ~~levels.~~**levels.**
2. All measures relied on to deliver either nutrient neutrality or **a reduction in** nutrient ~~betterment~~ **levels** must demonstrate with sufficient certainty that they:
 - a. ~~Meet the required~~ **Will achieve either** nutrient **neutrality or a** reduction **in** **nutrient levels** ~~or improvement;~~ and

- b. They eCan be secured and funded for the lifetime of the development's effects; and
- c. Do not compromise the ability of the River Clun SAC to reach favourable conservation status.

Explanation

4.134 The extent of the river Clun catchment is illustrated in Figure DP13.1.

Figure DP13.1: Extent of the River Clun Catchment



- 4.135 Part of the river Clun is a Special Area of Conservation (SAC) notified solely for the presence of Freshwater Pearl Mussels. The SAC is within Unit 6 of the River Teme Site of Special Scientific Interest (SSSI), which was assessed at March 2014 as being in unfavourable declining condition for a number of reasons. These include high levels of silt and nutrients (particularly ortho-phosphate and nitrogen) which affect the health of the pearl mussel population. A review of the monitoring data from the Environment Agency (EA) for the River Clun (2000-2011), shows that although there has been an improvement in the ortho-phosphate (P) concentration, it is higher than is required for a recruiting pearl mussel population. Additionally, in most of the river Clun, including within the SAC, it is higher than that required to maintain adult mussels. The River Clun Nutrient Management Plan 2014 was jointly commissioned by Natural England and the Environment Agency. It gathered together a wealth of information on the catchment and SAC, set targets for ortho-phosphate, nitrogen and suspended solids to be achieved by 2027 and detailed a range of mitigation measures that could be applied to reach the targets. Improvements to waste-water treatment works serving the catchment were made as a result of this.
- 4.136 Notwithstanding these improvements, the Habitat Regulations Assessment (HRA) for this Plan shows that most⁸ development in the river Clun catchment is likely to have an adverse effect on the river Clun SAC. Practical mitigation measures which would

~~remove this effect for larger applications have yet to be proposed, but this is not to say that they will not come forward during the Plan period. Accordingly, to comply with the requirements of the Conservation of Habitats and Species Regulations 2017 **as amended**, this policy restricts development to that which is either nutrient neutral in terms of its effect on the SAC or results in a **reduction in the level of nutrients entering the SAC.** betterment. This is in anticipation of measures to achieve either of these criteria being found in the future for the majority⁸ of development in the catchment. Such measures could include an updated Nutrient Management Plan and sufficiently robust Action Plan to provide the level of certainty required by the Habitats Regulations that the SAC restoration targets can be achieved in an appropriate timescale.~~

- 4.137 Natural England's advice on nutrient neutrality measures states that they should:
- a. Have sufficient certainty that the measures will deliver the required reduction to make the development neutral;
 - b. Have sufficient certainty that the measures will be implemented, e.g. secured and funded for the lifetime of the development's effects;
 - c. Be preventive in nature so as to avoid effects in the first place rather than offset or compensate for damage. Consideration will therefore need to be given as to (i) when the measures will come online and into effect and (ii) when the pollutants come online as the impact may be phased and take place over the lifetime of a development, rather than on day one. It may be that a range of measures may be helpful to address impacts over time;
 - d. Not undermine the objective of restoring the site to favourable condition by making the restore objective appreciably more difficult, or prejudicing the fulfilment of that objective. For example, where there is only a limited pool of measures available for addressing an existing exceeded threshold and these are used to enable growth rather than bring the site **SAC** into favourable condition. The key question would be whether, in fact, there is actually a limited pool of measures in the relevant circumstances;
 - e. Not directly use or double count measures that are in place, ~~to meet the Habitats Directive article 6(1)(2) requirements~~ **or must be put in place, to protect, conserve or restore the SAC** in order to justify new growth;
 - f. Be carefully justified, together with calculations of the baseline nutrient contribution of the development and any avoidance land (e.g. wetland to avoid effects). For example, over-estimating the existing impact of development land and under-estimating existing benefits from avoidance land to reduce the amount of measures needed to meet nutrient neutrality would not satisfy the precautionary principle; and
 - g. Ensure that the baseline for the development site and any avoidance land does not undermine the objective of restoring the site.

4.138 Consequently, mitigation measures to support development in achieving nutrient neutrality or a nutrient reduction will be set out in a River Clun Catchment Supplementary Planning Document (SPD). This SPD will be prepared once a River Clun SAC Restoration Plan is in place. The River Clun SAC Restoration Plan will set out the measures needed to bring the river Clun SAC back to favourable conservation status. Once these restoration measure have been determined, the mitigation measures needed to remove the impact of development on the SAC can be identified. Mitigation measures to remove an adverse effect from development must be in addition to, and must not prevent, the delivery of restoration measures for the SAC. If the SAC Restoration Plan identifies that developer contributions are also necessary to make development in the Clun catchment acceptable in planning terms; are

directly related to the development; and are fairly and reasonably related in scale and kind to the development; then these will be sought in line with Policy DP25.

4.139 The Council will support the statutory agencies and other relevant stakeholders in the preparation of the River Clun SAC Restoration Plan at the earliest opportunity in this Local Plan period, and to an agreed timescale. This, and the subsequent River Clun Catchment SPD will give the necessary certainty that the SAC can be protected from the adverse effects of development and will provide clarity and certainty for applicants on how to meet the requirements of this policy.

4.140 The River Clun Catchment SPD will also include a nutrient calculator. This will enable applicants to assess the amount of nutrients currently entering the river Clun SAC from their site and compare this with those projected to arise once development has taken place. Where development would increase nutrient levels, applicants will then be able to determine the most appropriate mitigation measures for achieving nutrient neutrality or a reduction in nutrient levels.

⁸ Shropshire Council has produced a Guidance Note on Development within the river Clun catchment which gives information on what types of development are not likely to damage the SAC and the information needed to support such applications www.shropshire.gov.uk/media/1874/gn12-development-within-the-river-clun-catchment.pdf

6.4.3. The Council considers that these minor modifications to Policy DP13 provide sufficient certainty that adverse effects from development in the river Clun catchment can be avoided and the River Clun SAC can thus be safeguarded. Additionally, as the housing allocations in Bucknell and Clun will be subject to Policy DP13, the Council considers it appropriate to continue to include them in the Draft Shropshire Local Plan.

NE further comments

6.4.4. Suggested re-wording of policy and paragraph 4.138 of the explanation (NE amendments shown in blue for clarity).

DP13 Development in the River Clun Catchment

1. To protect the integrity of the River Clun Special Area of Conservation (SAC) and to comply with the Habitats Regulations and policy DP12, development within the catchment of the River Clun will only be permitted if it can demonstrate ~~either nutrient neutrality or a reduction in nutrient levels, betterment,~~ that it will not increase nutrient levels or will deliver a nutrient reduction, and that the proposal does not compromise the ability of the river Clun SAC to reach favourable conservation status.

Developments must demonstrate that measures being utilised for nutrient neutrality or nutrient reduction are not required for site restoration and that the measure is secured and funded for the lifetime of the development's effects.

Developments that deliver a nutrient reduction (rather than being nutrient neutral) must demonstrate that maintaining the current or reduced nutrient levels would not undermine the objective of restoring the site to favourable conservation status.

Developments must also contribute towards the restoration of the river Clun towards favourable conservation status.


- ~~2. All measures relied on to deliver either nutrient neutrality or **a reduction in** nutrient betterment **levels** must demonstrate with sufficient certainty that they:~~
- ~~a. Meet the required **Will achieve either** nutrient **neutrality or a** **reduction in** **nutrient levels** or improvement; and~~
 - ~~b. They **can** be secured and funded for the lifetime of the development's effects; **and**~~
- ~~**c. Do not compromise the ability of the River Clun SAC to reach favourable conservation status.**~~

4.138 Consequently, mitigation measures to support development in achieving nutrient neutrality or a betterment nutrient reduction will be set out in a River Clun Catchment Supplementary Planning Document (SPD). This SPD will be prepared once a River Clun SAC Restoration Plan is in place. The River Clun SAC Restoration Plan will set out the measures needed to bring the river Clun SAC back to favourable conservation status. Once these restoration measure have been determined, the mitigation measures needed to remove the impact of development on the SAC can be identified. Mitigation measures to remove an adverse effect from development must be in addition to, and must not prevent, the delivery of restoration measures for the SAC. If the SAC Restoration Plan identifies that developer contributions are also necessary to make development in the Clun catchment acceptable in planning terms; are directly related to the development; and are fairly and reasonably related in scale and kind to the development; then these will be sought in line with Policy DP25.

- 6.4.5. Natural England remains concerned that there is not enough evidence to justify this policy and these allocations. No mitigation measures are suggested or have been proposed. There is a strong reliance on a restoration plan which while we agree is necessary, there has been no commitment by any organisation to produce one. Therefore, the certainty that one will be produced cannot be relied on. In addition, that Restoration Plan may require those sites that are suggested allocation may be critical for the restoration of the SAC, they may not but there is no evidence that they will not so the inclusions are considered premature.
- 6.4.6. Please see the Joint Advisory Position on the issue of the Clun Catchment which has been prepared by Natural England and the Environment Agency and is appended to this Statement of Common Ground (Appendix C).

Agreement not reached

7. Formal approval

	
Name:	Edward West
Position:	Planning Policy and Strategy Manager
Signature:	
Date:	24 th August 2021
Natural England	
Name:	Joanna Redgwell
Position:	Manager – West Midlands team
Signature:	
Date:	08/09/21

Appendix A: Natural England response to the Regulation 19 Pre-submission Draft Shropshire Local Plan

Date: 26 February 2021
Our ref: 337976
Your ref: N/A



planning.policy@shropshire.gov.uk
BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Consultation: Regulation 19 pre-submission draft of the Shropshire Local Plan

Thank you for your consultation on the above dated 18 December 2020

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.

The Town and Country Planning (Local Planning) (England) Regulations 2012

Natural England welcomes the content of the Local Plan and we have the following comments to make.

Soundness

Natural England notes that the plan is at the publication stage and as such your authority is seeking confirmation on the soundness of the plan. As far as Natural England is concerned the plan is largely considered sound i.e the plan is positively prepared as demonstrated by policies supporting green infrastructure and preventing fragmentation of habitats. The plan is justified, the evidence base appears robust as far as Natural England's remit is concerned and alternatives have been considered throughout the plan stages. As far as Natural England is concerned most of the policies within the plan are deliverable and flexible and therefore the plan should be effective and the plan is consistent with national policy with regard to those within Natural England's remit. Natural England however has reservations about the allocations within the catchment of the River Clun Special Area of Conservation (SAC), the related policy within the plan (DP13) and the Appropriate Assessment conclusions related to this SAC which will be covered in more detail below.

Duty to co-operate

Natural England can confirm that we have been involved in discussions with the local planning authority as the plan has emerged especially in relation to the following subject areas: Water quality and quantity, air pollution, biodiversity and geodiversity, landscapes, both nationally designated and local landscape character, green infrastructure including priority habitat creation, climate change, soil, waste, strategic mitigation solutions and biodiversity net gain. Additionally the Local Planning Authority (LPA) have been involved in discussions with Natural England as the Habitat Regulations Assessment for the plan has emerged and informed the different stages of the plan.

Habitats Regulations Assessment (HRA) and the River Clun SAC

Natural England acknowledges this report and confirms that we agree with the conclusions with the exception of the River Clun Special Area of Conservation.

With regard to the Appropriate Assessment for the River Clun SAC, we note that in your HRA screening on page 33, 232 dwellings are proposed within the catchment, however in the appropriate

assessment, 319 are proposed. Natural England is concerned that residential development within the allocated sites within the catchment may not be deliverable based on the current evidence.

3.23 of the Habitat Regulations Assessment (HRA) presents the AA of the River Clun SAC and correctly establishes that it is unfavourable – declining due to levels of phosphates, nitrogen and suspended solids in the river being too high to support the population of the freshwater pearl mussels for which the site is notified. The AA acknowledges that the river is important for salmon and trout but does not mention that these fish species are essential to the life cycle of the mussels as the juvenile mussels are encysted within the gills of these fish.

3.27 states that 319 dwellings and an employment site are allocated within the catchment and that without mitigation these will have an adverse effect on the integrity of the site without mitigation which Natural England agrees with.

3.29 refers to nutrient neutrality principles and the particular difficulties of applying it within the catchment of the River Clun i.e the requirements for the restoration of the SAC versus that which is required to provide for nutrient neutrality. Natural England agrees with this.

3.30 commits to working with stakeholders to develop a plan with enough certainty of mitigation measures and actions that will unlock development which Natural England welcomes and we look forward to these discussions. However one of the concerns we have is that we do not yet know where mitigation measures to restore the SAC would be best located. Potentially these allocation sites may be required for some of the mitigation measures described in 3.29 such as integrated constructed wetlands or to be rewilded. It may therefore be premature to include these allocation at this point.

3.31 refers to the specific policy in the local plan designed to protect the River Clun SAC (DP13) which requires development to either be nutrient neutral or provide a nutrient benefit despite the acknowledged difficulties above. In addition to those difficulties the wording nutrient neutral and nutrient betterment do not describe in enough certainty what would be required. For instance a heavily fertilised agricultural field is likely to generate higher levels of nitrogen than a residential development but in-combination could still be contributing to the failure of the SAC. There may also be unintended consequences of such wording in addition. If a landowner was planning to apply for planning permission in future they could spend the preceding years applying higher levels of fertiliser in order to reduce the requirements for mitigation when it becomes time to submit a planning application.

We note that at present no acceptable nutrient neutrality or nutrient betterment schemes have been seen by Natural England and that there is currently a live planning application for 55 dwellings in Bishop's Castle which has been in-determination for more than a year which neither the developers or your authority have been able to design a scheme which meets the requirements of the Habitat Regulations which again lends credence to these allocations being premature.

DP13 Development in the River Clun Catchment

Natural England welcomes the inclusion of a specific policy for the River Clun catchment and the requirements for a robust assessment of application under the habitat regulations however for the above reasons Natural England advises caution around nutrient neutrality and betterment. The explanation wording for the policy is all correct however.

Paragraph 4.136 states

“Practical mitigation measures which would remove this effect for larger applications have yet to be proposed, but this is not to say that they will not come forward during the Plan period.”

In Natural England's opinion alongside the issues highlighted above, this policy and the associated residential allocations may not be deliverable without additional work to inform the evidence underpinning the restoration scheme. We do not believe the policy and the allocations are compatible with the Dutch Nitrogen Judgment at the present stage though you may wish to seek

your own legal advice.

Notwithstanding the above we have the following comments on the content of the plan.

The Plan's vision and strategy

Natural England advises that the Plan's vision and emerging development strategy addresses impacts and opportunities for the natural environment. We note the aspiration to protect and enhance the environment and move towards a zero carbon economy.

We note the Strategic Approach and while Natural England has no comment on the numbers of new dwellings required we support the approach overall.

Policies

SP3 Climate Change Natural England supports this strategic policy for tackling climate change. All 4 parts of the policy are strongly supported by Natural England. Natural England also strongly supports DP11 Minimising Carbon Emissions.

DP12 The Natural Environment

Natural England strongly supports this policy. It should provide protection to the most aspects of the natural environment we are pleased to see net gain has been incorporated into the plan, in our view this could contribute to significant improvements for biodiversity and contribute to wider environmental benefits such as clean air and water and to help restore, buffer and connect existing environmental assets. We look forward to working with your authority on the scheme as it develops.

DP14 Green Infrastructure

Natural England supports this policy. Well designed multi-functional green infrastructure contributes greatly to a number benefits both for people and nature. Your green infrastructure should dovetail with your biodiversity net gain strategies in order to maximise benefits.

DP18 Pollution and Public Amenity

Natural England supports this policy especially with regard to requirements for air quality assessments and consideration of tranquillity within the Shropshire Hills Area of Outstanding Natural Beauty (AONB).

DP24 Shropshire Hills Area of Outstanding Natural Beauty.

Natural England welcomes the inclusion of a specific policy for the AONB. Great weight should be given to the comments of the AONB unit. You should also consider the setting of the AONB. Development in close proximity or adjacent to the AONB could have damaging impacts on the designated landscape.

Sites of Least Environmental Value

In accordance with the National Planning Policy Framework (NPPF), the plan's development strategy appears to avoid areas of high environmental value. Natural England notes the evidence in the HRA, which demonstrates that sites of least environmental value are allocated i.e. they avoid designated sites and landscapes. This is with the exception of the allocations within the catchment of the River Clun SAC as discussed above.

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 Grady McLean on 07881 835753. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours faithfully

Grady McLean

Lead Adviser – Planning
West Midlands Team
Grady.mclean@naturalengland.org.uk

Appendix B: Minutes of NE-SC liaison meeting 05.05.21

These minutes have been agreed by both parties.

Present:

Shropshire Council (SC)

Edward West (EW)
Ian Kilby (IK)
Matt Farmer (MF)
Sue Wykes (SW)
Joy Tetsill (JT)
Dan Corden (DC)

Natural England

Hayley Fleming (HF)
Grady McLean (GMc)
Joanna Redgwell (JR)

Key points for discussion:

The following key points were set out in an SC email in advance of the meeting, to focus discussion:

- That all parties agree the overall goal is to return the SAC to Favourable Conservation Status, but that this will require different levels of mitigations across different sectors
- That all parties agree the primary cause of harm to the SAC is agriculture and land management practices and therefore the majority of solutions to restoring the river fall outside the scope of the LPA
- That all parties agree a SAC Restoration Plan (or Nutrient Management Plan) is primarily the responsibility of NE and EA with SC and other stakeholder involvement. A new SPD could only cover the impact of new development, but we could commit to providing admin support (or other such support in kind) for a Partnership approach to develop a Restoration Plan to an agreed timescale.
- Given the above, there is a proportionality principle for the effect of development, especially considering permitted development activities.
- Nutrient neutrality for new development
 - What this means in the context of the completed upgrades to the WwTW, i.e. how is the 75% improvement now in place to accommodate SAMDev growth and the headroom this has created for the new Local Plan growth counted?
 - Agreement that new development should be delivering neutrality as part of proportionality
 - Betterment to be achieved where possible and viable, but is not a requirement
- Level of precautionary principle of site allocations
 - That it may be considered reasonable for the council to seek allocation of proposed sites ahead of defining mitigation measures, given the limited potential these sites have to be part of the overall solution.
- The prospect of landowners manipulating phosphate levels for their advantage is not a material planning consideration;
- Are there any minor mods we can make to the Plan now which would reduce level of objection?

Notes of discussion

These notes are grouped by topic to aid understanding rather than strictly following the order of the discussion.

1. Key points for discussion

There was agreement that the goal is restore the River Clun SAC to Favourable Conservation Status. The Draft Roadmap (supplied by HF and currently confidential) confirms this is achievable and begins to set out how .

There was agreement that agriculture is the main cause of the problem and that even without the contribution from Wastewater Treatment Works (WwTW) the river would still be in a failing condition. NE considered that given the Dutch Nitrogen Judgement, even if development was considered 'squeaky clean', it is difficult to see how HRA could be 'passed' given that the Clun Catchment would still be in a failing condition.

JT advised that she wanted to prepare a Statement of Common Ground to reflect the outcome of the discussion. NE could indicate areas where disagreement remained before it was finalised, but she felt such a document was needed for the Examination in the light of NE's objections to the Reg 19 consultation.

2. Nutrient neutrality (NN)

HF advised that NE had Counsel legal advice in autumn 2020 that because the catchment is so far over critical levels, the evidence justifies a nutrient neutral plus (NN+) approach. This would seek developer contributions to fund wider SAC restoration activities. Gmc stated that maintaining the 'status quo' would simply lock in failure as the Clun Catchment is in a failing condition, whereas NN+ would represent working towards its improvement. He added that there are around 30 catchments in this position nationally, but the Clun is more complex because it is designated for a species rather than a habitat.

SW asked whether voluntary measures, such as financial contributions for land users to use land in a set way, could be relied on within the HRA given the lack of certainty associated with the Dutch Nitrogen Judgement. HF responded that there is the problem with agricultural users, as there is no certainty about what will be done by farmers. NE have discussed this matter with the Catchment Sensitive Farming team and a RAG rating would need to be provided to give the required level of certainty. However, NE do not need absolute certainty, practical certainty - proof of funding and what it will achieve – is sufficient. But this is difficult.

JT asked whether a quantifiable financial contribution towards restoration of the SAC would provide sufficient certainty. Gmc responded that caution was needed as the funding would need to be appropriately used e.g. a programme of works would need to be set out. A SAC Restoration Plan would be required for spending such money and for ensuring development is not in any of the critical locations required for measure to enable the SAC to achieve favourable status. JT agreed with the need for a SAC Restoration Plan.

HF stated that NN is difficult, as it needs to isolate those measures required to achieve SAC restoration. A SAC Restoration Plan would normally be prepared before a Local Plan. The

Draft Roadmap proposes measures needed to restore the SAC and could inform a SAC Restoration Plan. As these measures are required for SAC restoration, they cannot be used to allow growth. She said that SC could look at measures not in the Draft Roadmap to allow development.

IK asked whether a mechanism for calculating/achieving NN+ could be developed. GMc suggested that Biodiversity Net Gain may allow for collection of money elsewhere in Shropshire to spend in the Clun. JT responded that in theory it is not a problem to include a financial contribution hook for NN+ in the Local Plan but that this would need justification and a plan for where SAC restoration measures would be best achieved. The latter is not an SC role.

IK, SW and JT asked at various times in the discussion, whether development could be decoupled from the SAC Restoration Plan e.g. allowing it come forward now and collecting money for spending in line with a SAC Restoration Plan to be prepared at a future date. HF replied that developer contributions could not be secured to prepare the Restoration Plan and that development could not be allowed to make things worse without the certainty that there was a remedy. GMc added that contributions could not be collected in advance of mitigation being put in place.

3. SAC Restoration Plan

NE stated that although there are 30 river catchments nationally in similar situations to the river Clun the key difference is that most have SAC Restoration Plans. Furthermore, the Clun is designated for the presence of species rather than a habitat - the former is more complex.

JR stated that a SAC Restoration Plan is key to this issue through a partnership working approach. NE need the Environment Agency (EA) to lead as this is their role but that unfortunately they are not currently on board.

EW responded that SC could provide administrative support for a partnership, but that NE and EA are the key players from SC's point of view. He asked what discussions NE has had with EA on a Restoration Plan.

HF replied that NE's Freshwater Lead Officer has advised that the responsibility for the Restoration Plan is shared between EA and NE. However, even if NE did offer to lead, they could not do it on their own because the modelling and maths for such a technical plan is something the EA have agreed to do under a technical agreement consent order. There may be an issue around resourcing such work but, in the meantime, a lack of EA engagement means that no progress on a SAC Restoration Plan can be made.

SW asked whether a consultant could do the modelling/maths instead. HF replied that EA's support would be needed for this, for the delineation of responsibilities and for the delivery of actions. JR and GMc added that any consultants would need information from EA and that some of the tools would also need EA buy-in.

JR explained that the River Clun SAC Restoration Plan could be prepared in a similar way to that in Herefordshire with EA as the lead and doing the writing. Delivery of the actions would then depend on appropriate partners. However, NE have not made much progress with EA on this over the years, despite escalating the issue to the national level. She suggested that

SC could consider phasing development so that it only commences once a SAC Restoration Plan is in place.

4. Wastewater Treatment Works (WwTW)

SW explained that the 75% reduction in phosphate at the WwTW (assumed to be put in place to allow development) was seen as a 'fair share' in the current Nutrient Management Plan. She queried whether this meant that development had already made its fair contribution. HF responded that national level discussions on fair share are taking place and that this may allow more scope for asking water treatment companies to do more. She stated though, that even if WwTW were taken out of the equation, the catchment would still be failing. GMc added that non-ST WwTW have not been upgraded and are not regulated by EA. He made the point that HRA assessment is alone and in-combination so that even though ST WwTW have been upgraded, they still need to be considered in-combination. He added that the Dutch Nitrogen Judgement means that the ability to allow new authorisations affecting a site which is failing is necessarily limited.

JT advised that Severn Trent (ST) say that they are operating below their current permit level in the Clun catchment and as such, there would appear to be some headroom. She asked whether this headroom could contribute to NN, assuming the permit level is correct. GMc expressed concern that the permit may not have been reviewed in the light of the Dutch Nitrogen Judgement - although HF added that EA might have a different view on this and may also not have any plans to review it.

SW raised the point the NE have advised that improvements to WwTW in Dogmarsh, Somerset could be considered within the HRA Appropriate Assessment, as this would offset but not remove developer contributions, so why are things different in the Clun? GMc responded that this may flip the SAC from failing to not-failing. SW responded that this was not the case as other improvements were still needed in the Dogmarsh case. HF said that the improvements may reduce NN requirements. SW felt the improvements should count towards NN targets but that at the moment there is no plan for what constitutes a fair and proportionate contribution.

GMc stated that nitrogen and silt need to be considered as well, not just phosphates.

5. The Local Plan

EW expressed a need to move on with the Local Plan and that said that agreement on what needs to happen, when and where was in both SC and NE interests. He felt there were 3 options

1. No development at all in the Clun catchment. However this does not constitute positive planning and would not secure developer contributions to restoration of the SAC.
2. As currently proposed: recognise the problem and recognise the need for a Restoration Plan. However, such a Plan is not yet in place, so the delivery of development could be linked to the preparation of one as he was hopeful this would happen in the lifetime of the Local Plan.
3. Delay the Local Plan until a SAC Restoration Plan is prepared.

However, he does not support options 1 or 3 so he asked what the best way forward would be - can NE's objections be addressed through minor modifications for instance?

HF was concerned that the Local Plan might be viewed as undeliverable under option 2.

EW felt that there would definitely be questions on deliverability at Examination, but that the Inspector would want to understand what discussions have taken place and what actions are proposed by NE and EA. Presenting a collaborative approach and setting out a timescale for a SAC Restoration Plan, combined with a policy that does not allow development until certainty can be achieved seems reasonable and would be in line with the approach on other issues in many other Local Plans. IK added that the Inspector would look at whether what is set out will happen in lifetime of the Local Plan.

EW stated that he would like agreement on the way forward to give to the Inspector. He re-iterated the earlier points that NE consider Favourable Conservation Status is achievable for the river Clun and that to achieve this, a SAC Restoration Plan is required.

JT proposed amending Policy DP13 to include a phrase that 'measures required for NN must not undermine the ability of the SAC to reach Favourable Conservation Status'. This could be supplemented by a 'roadmap' for the preparation of a River Clun SAC Restoration Plan which would set out NN measures necessary to allow development.

GMc responded that the removal of the allocated sites was a better option. Alternatively, SC could follow the reasons of overriding public interest route if they wanted to retain the sites, but that would need evidence that SC didn't have yet. HF added that SC may also want to try and define mitigation measures for development that were different to those needed for SAC restoration.

GMc asked whether SC had taken legal advice, as suggested in NE's Reg 19 rep. EW responded that he would consider seeking it but at the moment he was not sure which questions needed to be asked. HF suggested SC could modify the Plan then seek legal advice.

EW stated that he felt the issue of landowners increasing phosphate levels on their land in advance of submitting a planning application, as stated in NE's representation, was not a material planning consideration. GMc felt that this issue could be covered in any SAC Restoration Plan.

SW asked NE to provide SC with official written advice regarding the nutrient issues in the Clun catchment and planning applications. SC has had nothing to date although informal discussions have been held between officers. SW is aware that other catchments, (Lugg, Camel etc) have had official guidance from NE and views the same for the Clun as a priority. HF replied that official advice for SC has been discussed internally and she would look into issuing it.

6. Conclusions

The following actions were agreed

- a) JT to propose minor modifications to Policy DP13 and include them in a Draft Statement of Common Ground before sending SoCG to NE for comment.
- b) EW to seek a meeting with EA to establish their role in the preparation of a River Clun SAC Restoration Plan.
- c) SW to investigate NN options that would not compromise restoration measures for the SAC

d) SW to provide a copy of STW's advice on the permit situation at the WwTWs.

e) HF to provide SC with an advice letter setting out NE's position on development in the Clun catchment.

Additionally, SC stated that they would proceed with submission of the Local Plan in July 2021.

**Appendix C: NE-EA Joint Advisory Position on the Clun catchment
23.07.21**

Date: 22 July 2021
Our ref: -
Your ref: -

Eddie West, Planning Policy and Strategy Manager, Shropshire Council
By email only

Dear Eddie,

Joint Advisory Position on the issue of the Clun Catchment

Natural England (NE) and the Environment Agency (EA) have significant concerns regarding the sites proposed in the Shropshire Local Plan for the Clun catchment and deliverability of policy DP13 Development in the river Clun catchment. We advise that Shropshire Council removes the housing allocations located in the catchment of the River Clun SAC until there is greater certainty around available nutrient neutrality options. This is because in our view there is not currently the required degree of certainty that nutrient neutrality could progress without undermining the ability of the River Clun SAC to reach favourable conservation status

Background

Previous discussions, at issues and options stage linked to your emerging Water Cycle Study (evidence base), were around potentially removing allocations from the plan unless sufficient evidence was provided by you to confirm they were deliverable etc. More recently we have reiterated the need for you to confirm mitigation with sufficient certainty that shows your plan is effective and deliverable without prejudicing the restoration of the Clun SAC. However, your current position is to maintain sites within the Clun catchment in your plan for the reasons you have explained (including affordable housing need) and you have included a draft policy to try to safeguard/deliver them.

Planning applications are currently being held in abeyance and not determined within the Clun catchment. Elsewhere in the country planning applications have recently been refused/dismissed at appeal on the grounds of nutrient load impacts to similar sensitive Special Area of Conservation (SAC) catchments, in the absence of mitigation and certainty on such options¹.

The River Clun is a tributary of the River Teme in southern Shropshire. The lower 4.7 km of the River Clun is a Special Area of Conservation (SAC) designated for freshwater pearl mussel population (*Margaritifera margaritifera*). Analysis of water quality data for the River Clun SAC has identified that there are significant compliance gaps between the limits for freshwater pearl mussel and measured concentrations of phosphate, nitrogen and sediment in the River Clun SAC. We

¹ Examples include:

Wookey Hole road, Somerset – APP/Q3305/W/20/3257000

Canterbury Student Manor, Canterbury – Canterbury [APP/J2210/W/20/3251948](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/98444/APP/J2210/W/20/3251948)

therefore consider the interest features of the River Clun SAC to be unfavourable. The phosphate target for the site is 0.01mg/l Soluble Reactive Phosphorus (SRP) For Suspended Solids it is <10 mg/l and for Total Oxidised Nitrogen (TON) of <1.5 mg/l. These targets are stated in the Nutrient Management Plan for the River Clun which can be found [here](#).

Improvements to some sewage treatment works (such as Bucknell) have been completed and the water company considers that they have met their “fair share” of required reductions. However, these reductions along with Catchment Sensitive Farming advice to voluntarily reduce agricultural pollution will not reduce nutrient levels sufficiently to restore the condition of the SAC features. Further reductions of 70% phosphate and 90% of nitrogen are needed, along with reductions in suspended solids.

Further information relating to the unfavourable condition of the SAC and the underpinning SSSI designated under the Wildlife and Countryside Act 1981 (as amended) is available on <https://designatedsites.naturalengland.org.uk/SiteSearch.aspx>

The Site Improvement Plan for the River Clun SAC can be found here: <http://publications.naturalengland.org.uk/publication/6216527934128128>

Restoring the Clun

Extensive monitoring and modelling have been carried out (including work in the list below) in relation to the Clun catchment and we have clear and compelling evidence that significant change is required in order to restore the Clun to Favourable Condition. This evidence shows that restoring the Clun requires a reduction in sediment and nutrient loading and the restoration of natural hydrological functioning. Possible options to deliver this could include for example land use change such as reverting large areas to semi-natural habitat, changing to less intensive forms of agriculture, and requiring Severn Trent Water to reduce nutrient discharges to beyond their ‘fair share’. At this stage it is unclear if such options would be technically feasible.

The scale of change needed is large, and we feel it will be challenging to restore the Clun and meet the desired outcome. Further work is necessary. Ultimately, a river restoration plan needs to be written. The responsibility for producing a river restoration plan sits with Natural England in partnership with the Environment Agency, however input from other parties such as Severn Trent Water and Shropshire Council is essential both for plan writing and delivery.

Work carried out to date

Nutrient Management Plan (NMP), October 2014: Working with other partners, EA and NE developed a NMP. This identifies sources of nutrients that are entering the river and steps that can be taken to manage them. The aim of the plan is to manage nutrients in the River Clun SAC to protect the endangered freshwater pearl mussel population.

Protected Sites Options Appraisal, River Clun, November 2017. Mott MacDonald.

Draft Catchment Appraisal Options, NE/EA, December 2017.

River Clun catchment monitoring report, March 2019 update, EA/NE.

Grants Allocated to the River Clun Catchment (overview)

Environment Agency (Total £904k)

2011/2014 – The Freshwater Pearl Mussel Rescue project. £410k

2012/2013 - MURCI Waters project. £20k.

2013/2014 - *Slowing the Flow*. £39k
2015/21 – *Unmuddying the Waters Project*. £435k.

Shropshire Hills AONB (Total £3,020k)

2003 – 2007 *Blue Remembered Hills Project* £1.4 million

2007-2008 *River Habitat Project NE/EA funded c.£30k*

2008-2011 *AONB Freshwater Pearl Mussel Project c.£90k*

2011 -2014 *Sita and NE Pearl Mussel Project supported by Defra £45k, Sita £119k, NE £220k*

The Dutch Nitrogen cases

On 7 November 2018, the CJEU handed down its judgment on the joined [Coöperatie Mobilisation for the Environment cases](#) (often referred to as the Dutch Nitrogen cases) which related to nitrogen deposition from air pollution. In England, this affects how the assessment of plans and projects under the Conservation of Habitats and Species Regulations 2017 (as amended) ('the Habitats Regulations') should be interpreted and applied by competent authorities.

The judgment covered various matters but two aspects have particular relevance to water quality casework:

1. The court concluded that where the conservation status of a natural habitat is unfavourable, the possibility of authorising activities which may subsequently affect the ecological situation of the site seems “necessarily limited”.
2. The CJEU concluded that an Appropriate Assessment (AA) may not take into account the benefits of conservation, preventative or other measures if the expected benefits of those measures are not “certain” at the time of the assessment.

Consequently and in accordance with the clarification given by the Dutch Nitrogen Judgement, the scope for permitting further development that would add additional phosphate, nitrates or suspended solids either directly or indirectly to the site is necessarily limited, unless proven and detailed mitigation measures designed to avoid an adverse impact form part of the development proposal.

Following the Dutch Nitrogen Case, Natural England advises your Council that the [Nutrient Management Plan](#) written in 2014 cannot be relied upon as a strategic mitigation plan as it does not have enough certainty or detail. The plan contains a number of actions and recommendations required to restore the river, some of which have been undertaken, (such as the upgrades to numerous waste water treatment plants) while others have not. The significant majority of the nutrient and sediment contributions are from the agricultural sector which relies on implementation of voluntary rather than regulatory measures within the plan. There is not sufficient certainty to satisfy the requirements of the Habitats Regulations, in the delivery mechanism, funding streams or long-term security of those measures. It is likely that these measures would need to be secured long term in order to allow them to be considered as certain enough to potentially allow for proposed growth.

It has been established that a ‘nutrient neutrality’ approach to development is likely to be a lawfully robust solution to enable the grant of permissions that give rise to an appreciable effect. Examples of local authority catchment solutions include the [nutrient neutrality](#) methodology in the Solent, the River Avon Local Authorities phosphorus [interim development plan](#) to deliver phosphate neutrality, [Nitrogen Reduction](#) in Poole Harbour Supplementary Planning Document and the [River Wye interim development plan](#). The nutrient neutrality approach has been recently tested through the Fareham Judicial Review: <http://www.landmarkchambers.co.uk/wp-content/uploads/2021/06/Wyatt-v->

We advise that further work is required before a nutrient neutrality approach can be utilised. For such an approach to be lawful, the measures used to offset such impacts should not compromise the ability to restore the designated site to favourable condition and achieve the conservation objectives. In the absence of any detail currently, we do not have options or know which measures will need to be utilised to restore the site.

There is a risk that using a measure to offset development (i.e. making it nutrient neutral) could compromise the ability to achieve site restoration. However, we have been advising you to produce something as part of your local plan preparation to show whether this additional growth would compromise the ability to restore the site. In the absence of this (no relevant evidence provided as part of the local plan at this time) there is uncertainty and a potential risk.

For information, Article 6(2) of the Habitats Directive requires the restoration of Habitats Sites, Article 6(3) of the Habitats Directive suggests that sites must not be allowed to deteriorate as a result of new authorisations except in specific circumstances such as a lack of alternatives or overriding public interest. For further information now that the UK has left the European Union, Defra has recently published guidance covering the Article 6(2) obligations <https://www.gov.uk/guidance/duty-to-protect-protect-restore-european-sites> and the HRA requirements Article 6(3) <https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>.

Restoration Plan

We are looking to carry out work to establish a restoration plan. Timescales and likelihood of delivery are currently unknown. Additional work is required in order to fully understand what interventions are necessary to restore the river, and which interventions are over and above this and therefore may be available to make development nutrient neutral.

Will it address plan development growth?

Shropshire Council seems to be relying on a restoration plan being implemented during the plan period to enable development sites to come forward. It is a separate local plan matter to look at development impacts.

The restoration plan will aim to identify measures to resolve the existing problem and would not include for additional growth. Even if we had a plan that could be implemented, growth will increase the demand/risk and it is considered an additional pressure if allocations are included. That is why we have been advising you to produce, as part of your local plan and growth aspirations, an evidence base of possible mitigation measures, in sufficient detail including feasibility/likely cost, etc. This work might contribute to the restoration plan.

Current likelihood of deliverability with restoration plan

In the absence of a restoration plan and detail of evidence-based mitigation measures, the degree of certainty on achieving the proposed allocations in the Clun catchment with sufficient confidence that there would be feasible measures in place in the plan period is considered to be low. On that basis, we consider that the allocations should be removed. Additionally, in the absence of any certainty of such measures, it is also considered problematic to include mechanisms to secure developer contributions or similar due to a lack of certainty as to what that the contributions would be for. Contributions without a plan for the implementation of measures is not considered to be mitigation.

Yours sincerely,

Adam Lines

Area Environment Manager (Shropshire)

Hafren House, Welshpool Road, Shrewsbury, Shropshire, SY3 8BB

Telephone: 0203 025 1583

Email: Engagement_WestMids@environment-agency.gov.uk

Emma Johnson

West Midlands Area Manager

Mail Hub, Worcester County Hall, Spetchley Road, Worcester, WR5 2NP

Telephone : 07979 510221

Email : west.midlands.enquiries@naturalengland.org.uk