

Date: 04 December 2022  
Our ref: 414574  
Your ref: 223325



Planning  
Herefordshire Council  
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**BY EMAIL ONLY**

Dear Ms Webster

**Planning consultation:** Conversion of existing barn into residential dwelling  
**Location:** Tuck Mill Barn, Tuck Mill Lane, Marstow, Herefordshire, HR9 6EH

Thank you for your consultation on the above dated 28 November 2022.

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.

**SUMMARY OF NATURAL ENGLAND'S ADVICE**

**NO OBJECTION**

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on designated sites and has no objection.

Notwithstanding the above, your authority should be aware of a recent Ruling made by the Court of Justice of the European Union (the CJEU) on the interpretation of the Habitats Directive in the case of Coöperatie Mobilisation (AKA the Dutch Case) (Joined Cases C-293/17 and C-294/17).

The Coöperatie Mobilisation case relates to strategic approaches to dealing with nitrogen. It considers the approach to take when new plans/projects may adversely affect the ecological situation where a European site is already in 'unfavourable' conservation status, and it considers the acceptability of mitigating measures whose benefits are not certain at the time of that assessment.

Competent authorities undertaking HRA should be mindful of this case and should seek their own legal advice on the implications of these recent ruling for their decisions.

Natural England's advice on other natural environment issues is set out below.

**Internationally and nationally designated sites**

The application site is within the catchment of the River Wye which is part of the [River Wye Special Area of Conservation \(SAC\)](#) and within 3 km of the [Wye Valley Woodland SAC](#) which are European designated sites, and therefore the proposed plan/project has the potential to affect their interest features. European sites are afforded protection under the Conservation of Habitats and

Species Regulations 2017 (as amended), the 'Habitats Regulations'. The River Wye SAC is notified at a national level as the [River Wye Site of Scientific Interest \(SSSI\)](#), while the Wye Valley Woodland SAC is notified as [Upper Wye Gorge SSSI](#). Please see the subsequent sections of this letter for our advice relating to SSSI features.

In considering the European site interest, Natural England advises that you, as a competent authority under the provisions of the Habitats Regulations, should have regard for any potential impacts that a plan or project may have<sup>1</sup>. The [Conservation objectives](#) for each European site explain how the site should be restored and/or maintained and may be helpful in assessing what, if any, potential impacts a plan or project may have.

Natural England notes that your authority, as competent authority under the provisions of the Habitats Regulations, has undertaken an Appropriate Assessment of the proposal, in accordance with Regulation 63 of the Regulations. Natural England is a statutory consultee on the Appropriate Assessment stage of the Habitats Regulations Assessment process.

### **River Wye SAC - No objection**

Your appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, Natural England advises that we concur with the assessment conclusions, providing that all mitigation measures are appropriately secured in any permission given.

### **Wye Valley Woodland SAC- No objection**

Your appropriate assessment concludes that your authority is able to ascertain that the proposal will not result in adverse effects on the integrity of any of the sites in question. Having considered the assessment, and the measures proposed to mitigate for all identified adverse effects that could potentially occur as a result of the proposal, Natural England advises that we concur with the assessment conclusions, providing that all mitigation measures are appropriately secured in any permission given.

### **River Wye SSSI – No objection**

Based on the plans submitted, Natural England considers that the proposed development will not damage or destroy the interest features for which the site has been notified and has no objection.

### **Upper Wye Gorge SSSI– No objection**

Based on the plans submitted, Natural England considers that the proposed development will not damage or destroy the interest features for which the site has been notified and has no objection.

### **Landscape advice**

The proposed development is for a site within or close to a nationally designated landscape namely Wye Valley AONB. Natural England advises that the planning authority uses national and local policies, together with local landscape expertise and information to determine the proposal. The policy and statutory framework to guide your decision and the role of local advice are explained below.

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<sup>1</sup> Requirements are set out within Regulations 63 and 64 of the Habitats Regulations, where a series of steps and tests are followed for plans or projects that could potentially affect a European site. The steps and tests set out within Regulations 63 and 64 are commonly referred to as the 'Habitats Regulations Assessment' process.

The Government has produced core guidance for competent authorities and developers to assist with the Habitats Regulations Assessment process. This can be found on the Defra website. <http://www.defra.gov.uk/habitats-review/implementation/process-guidance/guidance/sites/>

Your decision should be guided by paragraph 176 and 177 of the National Planning Policy Framework which gives the highest status of protection for the 'landscape and scenic beauty' of AONBs and National Parks. For major development proposals paragraph 177 sets out criteria to determine whether the development should exceptionally be permitted within the designated landscape.

Alongside national policy you should also apply landscape policies set out in your development plan, or appropriate saved policies.

We also advise that you consult the relevant AONB Partnership or Conservation Board. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the AONB's statutory management plan, will be a valuable contribution to the planning decision. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to this type of development and its capacity to accommodate the proposed development.

The statutory purpose of the AONB is to conserve and enhance the area's natural beauty. You should assess the application carefully as to whether the proposed development would have a significant impact on or harm that statutory purpose. Relevant to this is the duty on public bodies to 'have regard' for that statutory purpose in carrying out their functions (S85 of the Countryside and Rights of Way Act, 2000). The Planning Practice Guidance confirms that this duty also applies to proposals-outside the designated area but impacting on its natural beauty.

### **Other advice**

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

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 regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk) .

Yours sincerely

Rob Sargent  
Consultations Team



## Annex A – Additional advice

Natural England offers the following additional advice:

### Landscape

Paragraph 174 of the [National Planning Policy Framework](#) (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Landscape Institute](#) Guidelines for Landscape and Visual Impact Assessment for further guidance.

### Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 174 and 175). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in [GOV.UK guidance](#). Agricultural Land Classification information is available on the [Magic](#) website on the [Data.Gov.uk](#) website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#), and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling separate guidance on soil protection for site restoration and aftercare is available on [Gov.uk](#) website. Detailed guidance on soil handling for mineral sites is contained in the Institute of Quarrying [Good Practice Guide for Handling Soils in Mineral Workings](#).

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

### Protected Species

Natural England has produced [standing advice](#)<sup>1</sup> to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

### Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 175 and 179 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and are included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the [Magic](#) website or as Local Wildlife Sites. List of priority habitats and species can be found on [Gov.uk](#). Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found [here](#).

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<sup>1</sup> <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

## Annex A – Additional advice

### Ancient woodland, ancient and veteran trees

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 180 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forestry Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

### Environmental gains

Development should provide net gains for biodiversity in line with the NPPF paragraphs 174(d), 179 and 180. Development also provides opportunities to secure wider environmental gains, as outlined in the NPPF (paragraphs 8, 73, 104, 120, 174, 175 and 180). We advise you to follow the mitigation hierarchy as set out in paragraph 180 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

Natural England's [Biodiversity Metric 3.1](#) may be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. For small development sites the [Small Sites Metric](#) may be used. This is a simplified version of [Biodiversity Metric 3.1](#) and is designed for use where certain criteria are met. It is available as a beta test version.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside [Biodiversity Metric 3.1](#) and is available as a beta test version.

### Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

## **Annex A – Additional advice**

### **Rights of Way, Access land, Coastal access and National Trails**

Paragraphs 100 and 174 of the NPPF highlight the importance of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on any nearby National Trails. The National Trails website [www.nationaltrail.co.uk](http://www.nationaltrail.co.uk) provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts.

### **Biodiversity duty**

Your authority has a [duty](#) to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available [here](#).

**The Conservation of Habitats and Species Regulations (2017)  
Part 6, section 63**

**'Assessment of implications for European sites and European offshore marine sites'**

**HRA Screening Assessment**

**APPLICATION NO:** 223325  
**SITE:** Tuck Mill Barn, Tuck Mill Lane, Marstow, Herefordshire, HR9 6EH  
**DESCRIPTION:** Conversion of existing barn into residential dwelling (Use Class C3).  
**GRID REFERENCE:** OS 354920, 219044

This is a record of the Habitat Regulations Assessment (HRA) (including Screening for Likely Significant Effects and Appropriate Assessment where required) carried out by Herefordshire Council (the competent authority) as required by Regulation 63 of the Conservation of Habitats & Species Regulations 2017 (the 'Habitats Regulations') relating to the following **planning application**. This HRA is carried out in accordance with the relevant guidance documents (Natural England <https://www.gov.uk/guidance/appropriate-assessment>, David Tylesley Associates <https://www.dtapublications.co.uk/>)

The HRA is carried out by Herefordshire Council. This will require sufficient detailed information to be provided by the applicant to enable the authority to make this assessment.

**The Project / Plan**

**1.1 Planning Application Reference Number, Description and Address**

APPLICATION NO: 223325  
SITE: Tuck Mill Barn, Tuck Mill Lane, Marstow, Herefordshire, HR9 6EH  
DESCRIPTION: Conversion of existing barn into residential dwelling (Use Class C3).  
GRID REFERENCE: OS 354920, 219044  
Link to Planning Application on Herefordshire Council Website:  
[https://www.herefordshire.gov.uk/info/200142/planning\\_services/planning\\_application\\_search/details?id=223325&search-term=223325](https://www.herefordshire.gov.uk/info/200142/planning_services/planning_application_search/details?id=223325&search-term=223325)

**1.2 Description of the plan or project (details)**

Conversion of existing barn into residential dwelling

**1.3 Documents and plans considered – delete/ add as appropriate**

- *Herefordshire Local Plan Core Strategy 2011 – 2031*
- *River Wye SAC Nutrient Management Plan (under review)*
- *Citation, Conservation Objectives, SIPs and other current advice and guidance in respect of River Wye SAC, Wye Valley Woodlands SAC*
- *National Planning Policy Framework*
- *The Conservation of Habitats and Species Regulations 2017, as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019' (the 'Habitats Regulations')*



1.3 Planning Policy context:

Required to comply with National Planning Policy Framework (2019).  
Required to comply with Herefordshire's Core Strategy 2011-2031

1.4 Size (ha) and description (habitats etc.) of existing site

0.2 ha



1.5 Surrounding land use and context in relation to designated sites

Agricultural

**Relevant Habitats (Natura 2000) site(s)**

River Wye Catchment SAC  
Wye Valley Woodlands SAC

**Details of the Site:**

	
River Wye SAC combined (March 2020)	Wye Valley Woodlands SAC con

Other relevant projects/ plans to be considered 'in combination'

*To include those within the planning system or granted but not yet operational, that would have similar impacts – for air emissions a radius of 500m would usually be appropriate*

None

Natural England consultation reference and summary (if available):

NONE

**Stage1: Preliminary Screening including Likely Significant Effects (LSE)**

Completed by:

Ecology (C. Nikitik)

Date: 25/11/2022

**Table 1: Initial Screening**

*Does the project or plan qualify for exemption from the HRA process?*

Is the project or plan directly connected with or necessary for the conservation management of the	NO
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habitat site (provide details)? If so the project may be considered exempt from the HRA process.	
Are there any other projects or plans that together with the project or plan being assessed could affect the site (provide details)?	YES All planning applications within the Wye Catchment may have an effect but these are subject to relevant HRA processes of their own. There are no specific 'in combination' planning applications immediately relevant to this case and assessment
If the proposal is considered exempt from the HRA process has this been consulted upon and agreed with Natural England?	NO

**Table 2: Screening for Likely Significant Effects (LSE)**

**Key issues considered:**

- |                                                               |                                                               |
|---------------------------------------------------------------|---------------------------------------------------------------|
| <input checked="" type="checkbox"/> Foul water                | <input type="checkbox"/> Water pollution                      |
| <input checked="" type="checkbox"/> Surface water             | <input type="checkbox"/> Water abstraction                    |
| <input type="checkbox"/> Emissions                            | <input type="checkbox"/> recreational impacts                 |
| <input type="checkbox"/> Construction or Demolition processes | <input checked="" type="checkbox"/> Protected species impacts |
| <input type="checkbox"/> Direct impacts inside SAC boundary   | <input checked="" type="checkbox"/> Other - Lighting          |

Details of key issues

Additional nutrient pathways due to increased foul water flows Effects of additional surface water that may be created Effects on bat activity-core sustenance zone
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**NB:** Where avoidance measures do not form an integral part of the project/ plan and are to be put in place to reduce the impacts, these must not be considered to avoid impacts at the Screening stage and will require consideration at the Appropriate Assessment stage (in line with the People Over Wind judgement).

Are there any potential effects of the project or plan when considered alone?	YES AS identified under key issues
Are there any potential effects of the project or plan <u>in combination</u> with other projects or plans?	YES if not mitigated Cumulative and 'in combination' with other developments within the SAC catchment.
Are the effects, either alone, in combination, or	YES – if not mitigated If not mitigated 'alone' then potentially cumulative and 'in combination' with other developments within the SAC

both, likely to be significant?	catchment..
Are protective measures required to address possible effects of the project	YES
Are there existing measures, part of the overall project (embedded), or other regulatory requirement (e.g. drainage basins, building regulations, watercourse protection) that avoid likely significant effects?	YES - partly General binding rules, building regulations
Is any further information and/ or mitigation required ( <i>Regulation 63(2)</i> ) to inform the Appropriate Assessment?	NO .

### Summary of LSE test conclusions

Likely significant effects – Appropriate Assessment required

### Stage 2: Appropriate Assessment

Completed by:

Ecology (C. Nikitik)

Date: 25/11/2022

### Appropriate Assessment information, discussion and proposed mitigation measures:

#### Table 3. Impacts of the plan/ project alone

Designated site features which may be potentially affected	Likely effect of Impacts
All Habitats and Species	Impacts to habitat quality through pollution (additional nutrients) of SAC river and tributaries impacting all habitats and species present
Horseshoe Bat species	Reduction in foraging/core sustenance habitat area.

#### Table 4. Impacts of the plan/ project in combination

Designated site features which may be potentially affected	Likely effect of Impacts and mitigation measures proposed
Not applicable see Table 3	Not applicable see Table 3

#### Table 5. Consequences for Conservation Objectives of the Designated Site

Disruptions or delays in progress towards achieving the conservation objectives of the site	YES potential effects on qualifying habitats and species as identified in Table 3
Impacts to maintaining the favourable condition of the site	YES potential effects on qualifying habitats and species as identified in Table 3
Alterations to natural progression or other changes within the site	YES potential effects on qualifying habitats and species as identified in Table 3
Loss of key habitat/ species features. Fragmentation or isolation of key species and habitats. Impacts to diversity, distribution, density, balance, area or population(s) of key species or habitats that are indicators of the favourable condition of the site, including from disturbance	YES potential effects on qualifying habitats and species as identified in Table 3
Alterations to the ecological relationships and balance between species and habitats that are key to the structure/ function of the site	YES potential effects on qualifying habitats and species as identified in Table 3
Alterations to nutrient balance or other processes vital to the functioning of the ecosystem (including phosphates)	YES potential effects on qualifying habitats and species as identified in Table 3

### Mitigation Requirements and Outcomes of these

#### Notes and comments in respect of HRA

##### River Wye SAC

The proposal is for conversion of existing barn into residential dwelling.

The site is located in the 'English' lower Wye catchment of the River Wye SAC.

Natural England have not currently advised the LPA that the 'English' Lower Wye SAC catchment is failing its conservation status

There are no local mains sewer systems.

##### Foul Water

- The applicant and supporting drainage strategy layout plan indicates that a new private foul water system will be installed to manage all foul water from the proposed development.
- Percolation tests produces an average Vp rate of 34 s/mm which is deemed acceptable.
- For foul water a new Package Treatment Plant is proposed prior to discharge via a drainage field. Calculations to determine the dimensions of drainage field indicate that the proposed size to be 47.7 m<sup>2</sup>.
- The LPA has no reason to consider that the soakaway field is not suitable or sufficient to manage the effluent discharged by the new.
- The proposed private foul water system can be secured by condition on any planning consent granted.

**Surface Water**

- The development will not result in any changes to the level of surface water flows.

**Wye Valley Woodlands SAC**

- The Ecological Impact Assessment Phase by Grassroots Ecology dated August 2022 and refers.
- No bat roosting potential by any species was identified within any part of the site subject to development or any associated disturbance.
- No significant areas of potential bat foraging or commuting features were identified or will be detrimentally impacted by the proposed development (subject to lighting constraints).
- The recommendations in the ecology report include appropriate detailed specifications for any external lighting that may be installed.

**Integrity Test and Alternatives**

**Integrity Test and Alternatives**

Can adverse effects be avoided or mitigated?

YES

*If adverse effects on the integrity of the site, either alone or in combination, cannot be ruled out through avoidance or mitigation, the following must be considered;*

**Are there Alternative Solutions to the proposal?**

Not applicable

**Where there are no satisfactory alternatives, the authority must consider whether the project or plan must proceed In Reasons of Overriding Public Interest (IROPI)?**

Not applicable

**Where it is proposed that the project or plan proceed IROPI, can suitable Compensatory Measures be secured?**

Not applicable

**Conclusion of the Appropriate Assessment:**

The authority concludes that **there would be NO adverse effects on the integrity of the Special Area of Conservation; subject to appropriate mitigation being secured. Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019** (the 'Habitats Regulations'), Part 6, section 63(5)

**NOTE: The authority must consult Natural England on the draft HRA.**

**Recommended Planning Conditions to secure appropriate mitigation where required (following full HRA that concludes no adverse effects subject to securing this mitigation)**

**Habitat Regulations (River Wye SAC) – foul water management**

As detailed in supplied plans and reports all foul water shall discharge to a new private foul water system (Package Treatment Plant) discharging to a suitable soakaway drainage field on land under the applicant's ownership; unless otherwise agreed in writing by the Local Planning Authority.

Reason: In order to comply with Conservation of Habitats and Species Regulations 2017, as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019' (the 'Habitats Regulations'), Wildlife & Countryside Act (1981 amended) National Planning Policy Framework, NERC Act (2006) and Herefordshire Local Plan - Core Strategy policies SS1, SS6, SD3, SD4 and LD2

**Protected Species (SAC) and Lighting (Dark Skies)**

At no time shall any external lighting, except low power (under 5 watt), 'warm' LED lighting in directional down-lighters on motion operated and time-limited switches, that is directly required in relation to the immediate safe use of the approved dwellings be installed or operated in association with the approved development and no permanently illuminated external lighting shall be operated at any time, without the written approval of this local planning authority.

All lighting installed shall demonstrate compliance with latest best practice guidance relating to lighting and protected species-wildlife available from the Bat Conservation Trust or Institution of Lighting Professionals.

Reason: To ensure that all species and local intrinsically dark landscape are protected having regard to The Conservation of Habitats and Species Regulations 2017, as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019' (the 'Habitats Regulations'), Wildlife & Countryside Act (1981 amended); National Planning Policy Framework, NERC Act (2006) and Herefordshire Local Plan - Core Strategy policies SS1, SS6, LD1-3.