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Our ref: 113446



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BY EMAIL ONLY

Dear Matthew

Planning consultation: Elstree Way Corridor Area Action Plan for submission to the Secretary of State

Thank you for your consultation dated 18 February 2014.

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.

Soundness

Natural England has no comments to make on the soundness of the plan which we consider to be broadly outside our remit.

General Comments

Natural England is disappointed by the lack of consideration of green infrastructure or the protection and enhancement of the natural environment in the plan.

The NPPF states that local planning authorities should plan 'positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure'. Urban green space allows species to move around within, and between, towns and the countryside. Even small patches of habitat can benefit movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. The NPPF recognises the contribution GI can make to the challenges posed by a changing climate, 'when new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure' (Para. 99).

We would welcome reference in the supporting text to Core Strategy policy CS12: The enhancement of the natural environment, including details of how this policy will be realised in the Elstree Way Corridor. We would also welcome reference to the Hertsmere Borough Green Infrastructure Plan.

It is important to emphasise the multi-functional benefits of GI to biodiversity, amenity, recreation and health and wellbeing and the need to consider GI in urban design and demonstrate how GI and green and open spaces could link to the wider GI network and interlink with access, the landscape and biodiversity.

There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through:

- green roof systems and roof gardens;
- green walls to provide insulation or shading and cooling;
- new tree planting or altering the management of land associated with transport corridors (e.g. management of verges to enhance biodiversity).

Sustainability Appraisal

Natural England welcomes the update to the Sustainability Appraisal, in response to the amendments to the plan and are satisfied with regards to our remit for the natural environment.

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

For any queries relating to this consultation please contact Merlin Ash on 0300 060 4271 or by email at merlin.ash@naturalengland.org.uk. For all other correspondence, please email consultations@naturalengland.org.uk, or if it is not possible to consult by email, please send to the above address.

Yours sincerely

Merlin Ash
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