

Astrid Harvey

From: Petrovic, Milena (NE) <Milena.Petrovic@naturalengland.org.uk>
Sent: 28 February 2019 16:22
To: Astrid Harvey
Cc: planning@westoxon.gov.uk
Subject: 270644 NE Response. Eynsham Neighbourhood Plan Reg 16.
Attachments: 260523 NE response Eynsham Neighbourhood Plan Nov 18.pdf

Dear Astrid,

As the Eynsham Neighbourhood Plan has not changed significantly on any points in Natural England's remit, I can confirm that our previous comments made for the Reg 14 consultation on 5th November 2018 are equally valid for the Reg 16 consultation.

I attach the letter here for ease of reference.

Kind regards,

Milena Petrovic
Adviser
Sustainable Development
Thames Team
Natural England

Tel: 02080 267824
Mobile: 07827552608

<https://www.gov.uk/natural-england>

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

Natural England offers two chargeable services – The Discretionary Advice Service ([DAS](#)) provides pre-application, pre-determination and post-consent advice on proposals to developers and consultants as well as pre-licensing species advice and pre-assent and consent advice. The Pre-submission Screening Service ([PSS](#)) provides advice for protected species mitigation licence applications.

These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, reduce the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

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Date: 05 November 2018
Our ref: 260523



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

T 0300 060 3900

neighbourhood_plan@eynsham-pc.gov.uk

BY EMAIL ONLY

Dear Mr Andrews,

Planning Consultation: Eynsham Neighbourhood Plan

Thank you for your consultation on the above dated 4 October 2018.

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.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where our interests would be affected by the proposals made.

In our review of the Eynsham Neighbourhood Plan we note that there are no designated sites or protected landscapes within or near the Neighbourhood Plan area and the plan does not allocate any additional sites for development. We are therefore satisfied that the Neighbourhood Plan can rely on the Habitat Regulations Assessment and Strategic Environmental Assessment undertaken for the adopted West Oxfordshire Local Plan.

We welcome inclusion of Policy ENP4 addressing Green Infrastructure, including Policy ENP4(a) which seeks to enhance biodiversity. Such an approach is supported by paragraph 174 of the National Planning Policy Framework (NPPF) which recommends that plans should identify and pursue opportunities for securing measurable net gains for biodiversity.

The NPPF also highlights the need for plans to identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks. As such, we would advise that the Neighbourhood Plan could map existing biodiversity assets, such as those mentioned in the text, including lowland meadows, ponds, the Chil Brook and other watercourses and woodlands. There is also considerable rare arable weed interest in the area, some of which is included in Local Wildlife Site designations. Existing mapping is available via www.magic.gov.uk and the Thames Valley Environmental Records Centre (www.tverc.org). Additionally, mapping could identify key areas to enhance and link these habitats, which could help guide delivery of biodiversity net gain from development. Such ecological mapping could also form part of a wider green infrastructure plan, to include the Local Green Spaces identified in the Neighbourhood Plan.

The recently produced [Neighbourhood Plan for Benson](#), in South Oxfordshire provides an excellent example; we are of the opinion that the policy wording around the Environment, Green Space and Biodiversity is exemplary. We would recommend you considering this document, when reviewing yours.

Annex A provides information on the natural environment and issues and opportunities for your Neighbourhood planning.

Yours sincerely,

Rebecca Micklem
Lead Adviser
Sustainable Development
Thames Team

Green Roofs

Natural England is supportive of the inclusion of living roofs in all appropriate development. Research indicates that the benefits of green roofs include reducing run-off and thereby the risk of surface water flooding; reducing the requirement for heating and air-conditioning; and providing habitat for wildlife.

We would advise your council that some living roofs, such as sedum matting, can have limited biodiversity value in terms of the range of species that grow on them and habitats they provide. Natural England would encourage you to consider the use of bespoke solutions based on the needs of the wildlife specific to the site and adjacent area. I would refer you to <http://livingroofs.org/> for a range of innovative solutions.

Annex A - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural Environment Information Sources

The [Magic](#)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification**, **Ancient Woodland**, **Areas of Outstanding Natural Beauty**, **Local Nature Reserves**, **National Parks (England)**, **National Trails**, **Priority Habitat Inventory**, **public rights of way (on the Ordnance Survey base map)** and **Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)².

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)³. Most of these will be mapped either as **Sites of Special Scientific Interest** on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)⁴.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)⁵ website and also from the [LandIS website](#)⁶, which contains more information about obtaining soil data.

Natural Environment Issues to Consider

The [National Planning Policy Framework](#)⁷ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁸ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan on the natural environment and the need for any environmental assessments.

¹ <http://magic.defra.gov.uk/>

² <http://www.nbn-nbr.org.uk/nbr.php>

³ <http://webarchive.nationalarchives.gov.uk/20140711135551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protection/management/absandspcstsimportance.aspx>

⁴ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁵ <http://magic.defra.gov.uk/>

⁶ <http://www.landis.org.uk/index.cfm>

⁷ <https://www.gov.uk/government/publications/national-planning-policy-framework-2>

⁸ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Landscape

Paragraph 170 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. Your plan may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁹), such as Sites of Special Scientific Interest or Ancient Woodland¹⁰. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species and habitat

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹¹) or protected species. Natural England has produced advice [here](#)¹² to help understand the impact of particular developments on protected species. 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](#).

Ancient woodland and veteran trees-link to standing advice

You should consider any impacts on ancient woodland and veteran trees in line with paragraph 118 of the NPPF. Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. Natural England and the Forest Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland 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/veteran trees where they form part of a SSSI or in exceptional circumstances.

Biodiversity netgain

Under section 40 of the Natural Environment and Rural Communities Act 2006 Local Planning Authorities are required to conserve biodiversity. The NPPF section 109 states "the planning system should contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity wherever possible". Suitable methods for calculating biodiversity net gain include the Defra biodiversity offsetting metric¹³ and the environment bank biodiversity impact calculator¹⁴. Natural England would expect a policy within the Neighbourhood Plan to include wording to ensure that net biodiversity gain is achieved.

⁹<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.natureinengland.org.uk/ourwork/conservation/biodiversity/protectedspeciesandwildlifedesignguidance.aspx>

¹⁰<https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹¹<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.natureinengland.org.uk/ourwork/conservation/biodiversity/protectedspeciesandwildlifedesignguidance.aspx>

¹²<https://www.gov.uk/protected-species-and-wildlife-how-to-review-planning-proposals>

¹³<https://www.gov.uk/government/consultations/biodiversity-offsetting-guidance-for-developers-developers-and-local-authorities-in-the-uk>

¹⁴<http://www.environmentbank.com/impact-calculator.php> and

¹⁵<http://www.google.co.uk/73m1=6dcl=6a=8&ec=source=web&cd=3&v=0&hUKEv7z6bUDQANWDAcXK8BIDEUdE6pZAA&url=http://www.environmentbank.com/impact-calculator.php>

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)¹⁵.

Green Infrastructure, Improving Your Natural Environment.

Inclusion of Green Infrastructure (GI) in to development plans can provide multifunctional benefits to the area. These can include opportunities for recreation, health and wellbeing and access to nature as well as providing connected habitats for wildlife.

Your plan or order can offer exciting opportunities to enhance your local environment through inclusion of GI. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained, connected, enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath with landscaping through the new development to link into existing rights of way or other green spaces.
- Restoring a neglected hedgerow or creating new ones.
- 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.
- Considering how lighting can be best managed to encourage wildlife.
- Adding a green roof or walls to new or existing buildings.

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#)¹⁶).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending 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).

¹⁵ <http://publications.natureinengland.org.uk/publication/35012>

¹⁶ <http://planningguidance.planningportal.gov.uk/how-guidance/openspaces-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space-local-green-space-design.html>