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Vale of White Horse District Council

**BY EMAIL ONLY**

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

T 0300 060 3900

Dear Jane Dymock

### **Planning Consultation: Radley Neighbourhood Plan, Second Consultation, Reg 14**

Thank you for your consultation on the above dated 6<sup>th</sup> September 2017.

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 Radley Neighbourhood Plan we note that there are designated sites within and near the Neighbourhood Plan area and the Plan does allocate additional sites for development, comprising approximately 20-25 new residential units, on top of the 900 units already proposed through the Local Plan. Sugworth Site of Special Scientific Interest (SSSI), which lies within the Plan area, is designated for its geological interest and none of the developments proposed within the Neighbourhood Plan are likely to impact on its interest features. Culham Brake SSSI, which lies roughly 460m outside of the Plan area, is a small area of willow carr and is seasonally flooded by the Thames. Whilst this designated site is hydrologically linked to the Thames, Policy PP.15 of the Neighbourhood Plan ensures that development will result in no increase in runoff through appropriate use of sustainable drainage systems. Therefore, we do not believe that the development proposed within the plan will result in significant impacts on these designated sites.

In addition we approve of the proposals relating to the enhancement of the Radley Lakes area for biodiversity. Nevertheless, we note the omission of a standalone Policy relating to the protection and enhancement of biodiversity across the Parish (as opposed to community actions). In particular we wish to highlight the requirement to conserve biodiversity and provide a net gain in biodiversity through planning policy (Section 40 of the Natural Environment and Rural Communities Act 2006 and section 109 of the National Planning Policy Framework). Whilst 'biodiversity gain' is referred to in the supporting text in Section 4.13 (The Natural and Historic Environment), no such measure is included in Policy and as such may not be enforceable. Please ensure that a development policy within the plan includes wording to ensure that "all development results in a biodiversity net gain for the parish". For instance such a policy would apply to the North-West Radley strategic development, which has the potential to result in the loss of an area of deciduous woodland located within the site boundary, and would ensure that any unavoidable loss of this priority habitat is adequately mitigated or compensated for.

Furthermore, we recommend that a Policy is included within the Plan which makes provisions for the following measures detailed in Section 4.13 of the plan:

- *'Existing hedgerows and tree belts are retained and where possible enhanced in developing the North-West Radley and South Kennington strategic housing sites, and in all other development;*
- *'Opportunities are taken for the active promotion of Green Infrastructure and biodiversity gain particularly in the Radley Lakes area'.*

Local Green Space designations may afford extra protection to open areas valued by members of the community, and can be designated through the neighbourhood plan process. The current plan document states that the 2016 consultation revealed *'great local concern...to safeguard specific small areas of unspoilt nature'* and *'other local areas rich in wildlife that are specially valued by local residents'*. As such, it may be appropriate to include policies which designate these valued areas as Local Green Spaces. Further information on Local Green Space designation can be found [here](#).

We also recommend that new development contributes to the provision of high quality green infrastructure along pedestrian and cycle routes both within the new development itself, and as a means of integrating new developments with existing green and built infrastructure. This would not only serve to make these routes more attractive, but would also go a small way to improving habitat connectivity within the landscape and facilitating species movement in response to climate change. Policy PP.12, which relates to the improvement of cycling and pedestrian routes, would be a suitable place to include this measure. Please refer to Annex A for examples of green infrastructure which could be included in a new development.

The recently produced [Neighbourhood Plan for Benson](#), in South Oxfordshire provides an excellent example of planning for biodiversity. Although the Plan has not been to referendum yet, we are of the opinion that the policy wording around the Environment, Green Space and Biodiversity is exemplary. We recommend that you consider this document, when reviewing yours.

#### Further Recommendations

- Policies related to Biodiversity Net Gain should propose the use of a biodiversity measure for development proposals. Examples of calculation methods are included in Annex A;
- Development sites should be assessed for 'Best and most versatile (BMV) agricultural land' (Grades 1-3a). Policies related to the mapping of land proposed for development should be included in the Plan. Loss of this resource must be avoided. Please see Annex A for further information.

Yours sincerely,

Chris Baines  
Sustainable Development Adviser  
Thames Team

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

## Natural Environment Information Sources

The [Magic](http://magic.defra.gov.uk/)<sup>1</sup> 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](#)<sup>2</sup>.

**Priority habitats** are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)<sup>3</sup>. 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](#)<sup>4</sup>.

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](http://magic.defra.gov.uk/)<sup>5</sup> website and also from the [LandIS website](http://www.landis.org.uk/)<sup>6</sup>, which contains more information about obtaining soil data.

## Natural Environment Issues to Consider

The [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework--2)<sup>7</sup> sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/)<sup>8</sup> 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.

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<sup>1</sup> <http://magic.defra.gov.uk/>

<sup>2</sup> <http://www.nbn-nfbr.org.uk/nfbr.php>

<sup>3</sup> <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

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

<sup>5</sup> <http://magic.defra.gov.uk/>

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

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

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

## Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)<sup>9</sup>), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>10</sup>. 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](#)<sup>11</sup>) or protected species. Natural England has produced advice [here](#)<sup>12</sup> 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

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 net gain

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 can include the Defra biodiversity offsetting metric<sup>13</sup> and the environment bank biodiversity impact calculator<sup>14</sup>. Natural England would expect a policy within the Neighbourhood Plan to include wording to ensure that net biodiversity gain is achieved.

## 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](#)<sup>15</sup>.

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<sup>9</sup><http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

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

<sup>11</sup> <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

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

<sup>13</sup> <https://www.gov.uk/government/collections/biodiversity-offsetting#guidance-for-offset-providers-developers-and-local-authorities-in-the-pilot-areas> Note; the 'Guidance for developers' and 'Guidance for offset providers' documents provide a calculation method.

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

[http://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=3&ved=0ahUKEwi7vcbI0aDQAhVMDcAKHb8IDEUQFggsMAI&url=http%3A%2F%2Fconsult.welhat.gov.uk%2Ffile%2F4184236&usq=AFQjCNFfkbJJQ\\_UN0044Qe6rmiLffxckg](http://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=3&ved=0ahUKEwi7vcbI0aDQAhVMDcAKHb8IDEUQFggsMAI&url=http%3A%2F%2Fconsult.welhat.gov.uk%2Ffile%2F4184236&usq=AFQjCNFfkbJJQ_UN0044Qe6rmiLffxckg)

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

## 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](#)<sup>16</sup>).
- 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).

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<sup>16</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

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### 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.