Adding to our consultation response to the Weston-on-the-Green Neighbourhood Plan on 11th December 2018, I can confirm here that Natural England continues to hold the view that the Weston-on-the-Green neighbourhood plan does not require an SEA.

Kind regards,

[Name]
Adviser
Sustainable Development
Thames Team

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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Dear sir/madam,

Please find attached our response to the consultation above.

Kind regards,

Sustainable Development Adviser
Thames Team
Natural England
https://www.gov.uk/natural-england

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Dear Sir or Madam,

**Planning Consultation: Weston-on-the-Green Neighbourhood Plan**

Thank you for your consultation on the above dated 15 November 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 Weston-on-the-Green Neighbourhood Plan we note that:

- there are designated sites or protected landscapes within or near the Neighbourhood Plan area but the Plan does not pose additional risk to them by allocating new development.

We do, however, have some specific comments to make in relation to the Plan’s policies;

- The Plan refers to the now out-dated NPPF. The NPPF was revised earlier this year with stronger wording surrounding the protection and enhancement of the natural environment. A key change has been the strengthening of the wording around development providing net gain; with the new NPPF removing the ‘where possible’ caveat. We would advise you amend the Plan in order to refer to the revised NPPF.

- We welcome policy E2 to preserve and enhance green infrastructure in the parish. We would recommend including wording that ensures the maintenance of green infrastructure in perpetuity to ensure the environmental and social benefits are maximised.

We would like to draw your attention to the opportunities of the Plan to protect and enhance biodiversity. We are pleased that the ‘Schoolfield’ has come forward as policy to preserve and manage a key site for biodiversity and access in the parish. Weston-on-the-Green is within Natural England’s Bernwood Focus Area and this site is the perfect opportunity to enhance the local wildlife associated with the ancient Bernwood Forest. The historical importance of Ridge and Furrow at this site is significant and we believe that this should also be preserved in line with any biodiversity enhancements. More information around the Bernwood Focus Area can be found at the bottom of this response (Appendix A).
**Strategic Environmental Assessment and Habitats Regulation Assessment**

Where Neighbourhood Plans could have significant environmental effects, they may require a Strategic Environmental Assessment (SEA) under the Environment Assessment of Plans and Programmes Regulations 2004. Further guidance on deciding whether the proposals are likely to have significant environmental effects and the requirements for consulting Natural England on SEA are set out in the National Planning Practice Guidance [here](#).

Where a neighbourhood plan could potentially affect a European protected site, for example a Special Protection Area or Special Area of Conservation, it will be necessary to screen the plan in relation to the Conservation of Habitats and Species Regulations (2010), as amended (the 'Habitats Regulations'). One of the basic conditions that will be tested at Examination is whether the making of the plan is compatible with European obligations and this includes requirements relating to the Habitats Directive, which is transposed into the Habitats Regulations.

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

Yours sincerely

Pierre Fleet  
Adviser  
Sustainable Development  
Thames Team
Annex A – Bernwood Focus Area

Natural England have developed Focus Areas around the country where we can target our work strategically and we would like you to be involved. Over the next 20 years, Natural England will be working closely with our partners and local communities to increase and strengthen this mosaic of connecting habitats, which underpin the historic environment. Below are some suggestions which you may want to incorporate into your neighbourhood plan which will benefit both your local community and wildlife.

Bernwood Focus Area

Your parish is within the Bernwood Focus Area. Bernwood covers the relics of the ancient royal hunting forest in Oxfordshire and Buckinghamshire, in an approximate triangle between Oxford, Buckingham and Aylesbury encompassing the river Ray and the Thame. The area supports the best population in the country of black and brown hairstreak butterflies which lay their eggs on the thick blackthorn hedgerows weaving between the ancient woodlands and species-rich lowland meadows. The area provides habitat for a number of wading birds and bat species including the rare Bechstein’s bat. The area still supports a few isolated pairs of breeding turtle doves which need scruffy arable margins close to large thick hedges in order to survive.

Creating good habitat for bats

A network of woodland, hedges and clean water sources will benefit not only bats but other fauna and flora. For information on how to create ponds for bats, Freshwater Habitats Trust produced an information package alongside Bat Conservation Trust which can be found here. You may want to look at how to incorporate good habitat for bats into gardens as part of you parish’s green infrastructure here. Ponds also create sources of fresh water in your community, providing habitat for two thirds of freshwater species and outdoor spaces for the community to visit. More information can be found here.

Managing hedgerows for butterflies

The Bernwood area has a large network of blackthorn hedges, these need to be maintained by cutting every three years rather than annually so that hairstreak butterflies can successfully lay their eggs. You may want to consider creating new species-rich hedgerows and there is the chance to use ancient practises such as hedge laying. More information on management can be found here.

Where possible, existing hedgerows and mature trees should be retained and additional ones planted as part of the landscaping scheme. These opportunities should always offer optimal wildlife benefits, by planting mixed native hedges, with a dominant component of blackthorn to benefit a variety of common species as well as the hairstreaks. Planting of trees in and around residential developments is important not just within the allocated open green areas/parks.

Creating or restoring lowland meadows

Lowland meadow is a declining habitat but is still littered across this part of the UK. Priorities should be to expand the area of lowland meadows by restoring semi-improved grasslands and re-creating lowland meadows on improved grassland and arable land. Where possible, action should be targeted at expanding and linking existing sites. Magnificent Meadows have very useful information here. Consider how to join up habitats to improve connectivity on a landscape-scale for example BBOWT Living Landscape of the Upper Ray.

Ancient woodland

Ancient woodland and veteran trees are an irreplaceable habitat which has heritage and cultural value and provides ecosystem services, such as shade, reduction of flood risk, carbon capture, improved air quality and purification of water. It is preferable to link up fragmented areas by connecting up woodland
which would be divided by development with green bridges or tunnels, buffering it by leaving an appropriate zone of semi natural habitat between the development and the woodland, providing wildlife corridors and balancing new developments and residential areas with green infrastructure, allowing space for trees. The Woodland Trust have further information which can be found here and funding streams on how to enhance existing ancient woodland and expand woodland can be found below.

**Beyond biodiversity**

Creating and enhancing some of these habitats will not only ensure better biodiversity and habitat for rare butterflies, bats, great crested newts but, if located in the right places, it can also help to provide more clean water in the catchment, increase climate change resilience¹, help with floodwater management and improve air quality. Providing accessible natural areas can also help to improve both the mental and physical health² of the people in your parish.

**Do you have any environmental projects in mind for your parish? Below are some funds you may be interested in to help enhance you community:**

**HS2 woodland fund**

This enables woodland land owners to restore PAWS (Plantation on Ancient Woodland) or extend existing ancient woodland in a 25 mile radius of the HS2 line. Information on how to apply can be found here.

**HS2 Community and Environment Fund**

This fund is designed for communities along the HS2 route that are demonstrably disrupted by the construction of Phase One from London to Birmingham. Information on how to apply can be found here.

**TOE2 No Net Loss of Biodiversity on the Greater West Programme (Oxfordshire only)**

There will be some habitat loss due to Network Rail’s improvement of the Greater West Programme. Funding is available for the creation and improvement of similar habitats to those that have been lost, including funds for up to three years aftercare. Information on how to apply can be found here.
Annex B - 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\(^2\).

Landscape

Paragraph 170 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 in order to respect 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 the requirements of the NPPF. This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in Natural England’s Technical Information Note 049.

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. 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\(^3\) 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 SSSI or in exceptional circumstances.

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3. [https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals](https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals)
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 paragraph 174 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 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 here. 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.

Ancient woodland and veteran trees

You should consider any impacts on ancient woodland and veteran trees in line with paragraph 175 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 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.

Environmental enhancement

Development provides opportunities to secure a net gain for nature and local communities, as outlined in paragraphs 8, 32 and 170 of the NPPF. We advise you to follow the mitigation hierarchy as set out in paragraph 175 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 may wish to consider off site measures, including sites for biodiversity offsetting. 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.

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).

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.

Rights of Way, Access land, Coastal access and National Trails
Paragraph 98 of the NPPF highlights the important 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 the any nearby National Trails. The National Trails website 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.

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).
- 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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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.