

Date: 14th February 2014

Our ref: 109107

Your ref: -



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Drayton (Abingdon) Parish Clerk

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BY EMAIL ONLY

Dear Sir/Madam,

Consultation Draft of the Drayton Neighbourhood Plan.

Many thanks for the above consultation. 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 they consider our interests would be affected by the proposals made. Natural England does not have the resources to get involved in all neighbourhood plans and will prioritise our detailed engagement to those plans that may impact on internationally or nationally designated nature conservation sites, and/or require Strategic Environmental Assessment or screening for Habitats Regulations Assessment.

Natural England does not consider that this plan poses any likely significant risk to internationally or nationally designated nature conservation or landscape sites. As such most of our comments are generic, but we also have a number of specific comments to make on the neighbourhood plan.

Specific comments

Without having looked at the plan in detail, the general impression is that the plan is very positive with respect to the natural environment.

We note that planning policy P-WP8: is entitled "biodiversity offsetting". Biodiversity offsetting is generally regarded as having a specific meaning (which we won't try to define here but involves converting biodiversity value into a common metric by means of standardised methodology). It may be more appropriate to use the term "biodiversity compensation" (which would include biodiversity offsetting as one of a number of delivery options). Whatever language is chosen, it might also be helpful if the supporting text set out some of the factors to be considered when thinking about net gain and compensatory measures. It is sometimes proposed in planning applications, for example, that replacing a lost habitat (e.g. a hedgerow) with an new one of equal size/length is sufficient compensation to achieve not net loss. However this does not factor in the time delay in achieving the ecosystem functions and delivery risk that the measure does not deliver the expected outcome.

While we do not have any views on which sites would be most or least appropriate for housing allocation, we note that a number of the proposed sites contain or adjoin public rights of way, and as such their development may reduce the enjoyment of these routes for existing residents. This appears to have been factored in to some of the thinking about the sites concerned, but we advise that should any such sites be allocated, appropriate levels of onsite mitigation (to reduce the urbanising effect of the development on the public right of way) and off site compensatory measures (enhancement to existing public rights of way, and/or creation of new permissive routes) are sought from these sites, such that there is a t least no net detriment to the existing public right of way network.

We note reference in para 85 to bird and bat boxes, which we welcome. In our view these are much more valuable if incorporated into the built fabric rather than tacked onto trees etc., from which they fall or rot. You may wish to add “into the built fabric” at the end of the first bullet point here.

Generic comments

The following is offered as advice to assist the Town Council.

Natural England, together with the Environment Agency, English Heritage and Forestry Commission has published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: <http://publications.environment-agency.gov.uk/PDF/GEHO0212BWAZ-E-E.pdf>

Local environmental record centres hold a range of information on the natural environment. A list of local records centre is available at: <http://www.nbn-nfbr.org.uk/nfbr.php>

Protected species

You should consider whether your plan has any impacts on legally protected species. To help you do this, Natural England has produced standing advice to help understand the impact of particular developments on protected or Biodiversity Action Plan species should they be identified as an issue. The standing advice also sets out when, following receipt of survey information, you should undertake further consultation with Natural England. [Natural England Standing Advice](#)

Opportunities for enhancing the natural environment

Neighbourhood plans may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably and bring benefits for the local community, for example through green space provision and access to and contact with nature.

The lack of detailed comment from Natural England should not be interpreted as a statement that there are no impacts on the natural environment. Other bodies and individuals may make comments that will help the Parish/Town Council or Neighbourhood Forum to fully take account of the natural environment in the plan-making process.

If, as you develop your plan, you consider that it will significantly impact on designated nature conservation sites or protected species or has other significant impacts on the natural environment then you should consult Natural England again.

For any correspondence or queries relating to this consultation only, please contact Charles Routh on 07990 773630. For any new consultations or issues, please contact consultations@naturalengland.org.uk.

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.

Yours sincerely

Charles Routh

Lead Adviser, Winchester Land Use Operations Team, Natural England.