

Date: 01 July 2019
Our ref: 284679
Your ref: Princes Risborough Expansion SPD



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Dear Ms Pantel,

Princes Risborough Expansion Supplementary Planning Document (SPD)

Thank you for your consultation request on the above dated and received by Natural England on 4th June 2019.

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.

Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature. We welcome this opportunity to give our views on this Supplementary Planning Document.

Landscape and Visual Amenity

The expansion zone begins approximately 720m from the boundary of the Chiltern Hills Area of Outstanding Natural Beauty (AONB). Given this proximity, it occupies an area within the setting of this nationally designated landscape. The site's current rural and undeveloped character complements and supports the landscape character of the AONB. As such, its development could compromise the statutory purpose of the AONB designation. The LPA should be cognisant of its legal duty to 'have regard' to that statutory purpose.

Natural England welcomes the measures taken to reduce the visual impact on the landscape and its receptors (i.e. walkers on the escarpment or the Ridgeway National Trail), in the form of a comprehensive Green Infrastructure (GI) strategy (discussed later), and careful consideration of building heights and densities. However, we consider it appropriate for a Landscape and Visual Impact Assessment (LVIA) to be conducted for the plan, to highlight the most sensitive areas within the expansion area. This will ensure the developments within the expansion area are assessed cumulatively, and as a whole. There should be subsequent discussion within the SPD on how the mitigation measures proposed mitigate specific landscape and visual effects, to ensure the overall rural character of the view is maintained.

Longwick itself is currently clearly separated from Princes Risborough. Retaining this clear division in views from the AONB should be a key consideration in relation to the proposed expansion area. It is unclear from the SPD and its appendices how large the proposed buffer actually is. The buffer

may need to be widened to achieve the clear separation required to maintain the views.

High quality built design and the use of appropriate building materials will be essential to minimise landscape and visual impacts. We advise you to refer to the [Chilterns AONB Design Guide](#), which contains advice on retaining the special qualities of the Chilterns AONB within the built environment. This is especially the case for those areas with views from the AONB and where the rural character is important, such as the Risborough Rural character area.

We also advise that you consult the Chiltern Hills AONB Conservation Board. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the AONB's statutory management plan, will be a valuable contribution to the planning decision. The [Longwick Vale Landscape Character Assessment](#) (LCA) is also a helpful guide to the landscape's sensitivity to this type of development and its capacity to accommodate the proposed developments.

Lighting (Biodiversity and AONB)

Light pollution has negative impacts on local amenity, intrinsically dark skies and nature conservation (especially bats and invertebrates). At a detailed level, a strategic lighting design will be required to demonstrate how low level lighting can be achieved and dark corridors included, allowing nocturnal species to commute and forage.

We welcome the mention of the Institution of Lighting Professional Guidance for the Reduction of Obtrusive Lighting (Jan 2012) in reference to the proposed Strategic Open Spaces 1 and 2 (SOS1 and SOS2). We do however, wish to see this approach extrapolated to the Expansion Area as a whole, to minimise visual impact on the AONB.

Green Infrastructure

We welcome the planned network of Green Infrastructure (GI) provision which is included within section 3.6 of this SPD.

Longwick Bog and Kingsmead Meadow – we support the buffering for wildlife sites at these locations through the Crowbrook Corridor. Evidence should be provided to verify that these buffers are wide enough to ensure increased recreational pressure will not have an adverse effect. It currently seems that there are parcels of land for development abutting these sites. Other streams in the plan area should be afforded similar protection.

Longwick Gap - area of GI (details in section 3.6.2) should allow for a sufficient buffer between the expansion area and the rural village of Longwick, in order to preserve the distinction. It is unclear from the SPD how wide this gap is, and whether it is suitable in its task of preserving the separation of Longwick.

Green Lanes – these green lanes should be implemented and fully accessible prior to the commencement of grey infrastructure development. This should include prior planting of the proposed new trees and hedgerows, as well as early pond creation to enable biodiversity establishment.

Please ensure that the GI for the extension areas continues to be in line with the [Buckinghamshire GI strategy](#) which covers your area.

Biodiversity

We support the aspiration to create ecological networks and connectivity within the expansion area. We do however recommend you to include a requirement for a net gain for biodiversity. This is strongly supported by the National Planning Policy Framework (NPPF), paras. 170, 174, and is

likely to be mandated by the Government within the forthcoming Environment Bill. Creation, enhancement and protection of habitats, and provision for their long term maintenance will need to be developed. This ecological network of habitats could be integrated into the GI strategy.

Some areas within the SPD mentions use of 'predominantly native' trees and plants. We advocate the use of native vegetation, which is characteristic of the Chilterns, throughout the expansion area. This could include such species as hornbeam, whitebeam, beech, field maple and wayfaring tree, as well as native hedgerow species such as hawthorn and blackthorn.

Soils – Agricultural land

Natural England is concerned with the loss of very good/good quality agricultural land and the absence of supportive evidence to illustrate land of lower environmental quality has been assessed as a suitable alternative. However, we consider our concerns can be overcome by additional policy wording and/or supplementary detail, which we have highlighted in further detail below. Paragraph 170 of the NPPF states that '*planning policies and decisions should contribute to and enhance the natural and local environment by...protecting and enhancing...soils*'.

The best and most versatile (BMV) land is defined as Grades 1, 2 and 3a by policy guidance (see Annex 2 of the NPPF). The expansion plan should safeguard the long term capability of BMV land, and make clear the areas of lower quality agricultural land should be used for development in preference to the BMV land. The plan should safeguard that development (soil sealing) has an irreversible adverse (and cumulative) impact on the finite national and local stock of BMV land. Avoiding loss of BMV land is the priority as mitigation is rarely possible. Retaining BMV land enhances future options for sustainable food production and helps secure other important ecosystem services.

There is currently a lack of reference to soil resources in the SPD, therefore further detail to sections 2 (Analysis) and 3 (Development Requirements) is advised and would be consistent with Para. 170 of the NPPF. Natural England's suggested addition is provided below:

Development will need to consider soil impacts due to the fact that part of the site includes areas of Grade 3a (good) and Grade 2 (very good) agricultural land. Development should be targeted to areas of poorer quality land and developers should consider impacts on soil resources during construction and operation, adhering to DEFRA's [Code of Practice](#) to protect soil resources

The National Planning Policy Framework states that local planning authorities should 'take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure;'. The Planning Practice Guidance on [Green Infrastructure](#) provides more detail on this.

Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting 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. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities.

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 (e.g. management of verges to enhance biodiversity).

You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.

Further information on GI is include within The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "[Good Practice Guidance for Green Infrastructure and Biodiversity](#)".

Biodiversity enhancement

This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the [Exeter Residential Design Guide SPD](#), which advises (amongst other matters) a ratio of one nest/roost box per residential unit.

Landscape enhancement

The SPD 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 infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might makes a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.

For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.

Other design considerations

The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity ([para 180](#)).

Strategic Environmental Assessment/Habitats Regulations Assessment

A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance [here](#). While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.

Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.

Please send all planning consultations electronically to the consultation hub at

Yours sincerely,

Eleanor Sweet-Escott
Lead Adviser – Sustainable Development

Annex A – additional advice

Natural England offers the following additional advice:

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](#)¹ 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.

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.

¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

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](#)². 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)

²<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

- 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 importance 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 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](#).