Final SEA Screening by Aylesbury Vale District Council for consultation in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004



Newton Longville

Neighbourhood Plan

SEA Screening – FINAL VERSION

September 2019

Aylesbury Vale District Council

Strategic Environmental Assessment Screening Report

For the NEWTON LONGVILLE Neighbourhood Plan

FINAL Version

A consultation was carried out by AVDC consulting Natural England, the Environment Agency and Historic England between 18 July 2019 and 30 August 2019.

4 SEPTEMBER 2019

NEWTON LONGVILLE NEIGHBOURHOOD PLAN

FINAL SEA Screening

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1. Introduction

- 1.1 This screening statement considers whether the contents of the Newton Longville Neighbourhood Plan requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.2 The screening process is based upon consideration of standard criteria to determine whether the plan is likely to have "significant environmental effects". The result of AVDC's screening process is detailed in this Screening Statement.
- 1.3 The legislative background set out below outlines the regulations that require the need for this screening exercise. Section 4, provides a screening assessment of the likely significant environmental effects of the policies in the Newton Longville Neighbourhood Plan and the need for a full Strategic Environmental Assessment.

2. Legislative Background

- 2.1 The basis for Strategic Environmental Assessments and Sustainability Appraisal legislation is European Directive 2001/42/EC and was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations. Detailed Guidance of these regulations can be found in the Government publication 'A Practical Guide to the Strategic Environmental Assessment Directive'¹.
- 2.2 The Planning and Compulsory Purchase Act 2004 required Local Authorities to produce Sustainability Appraisals (SA) for all local development documents to meet the requirement of the EU Directive on SEA. It is considered best practice to incorporate requirements of the SEA Directive into an SA.
- 2.3 Although a Sustainability Appraisal is not a requirement for a Neighbourhood Plan, part of meeting the 'Basic Conditions' which the plan is examined on, is to show how the plan achieves sustainable development. The Sustainability Appraisal process is an established method and a well recognised 'best practice' method for doing this. It is therefore advised, where an SEA is identified as a requirement, an SA should be incorporated with SEA, at a level of detail that is appropriate to the content of the Neighbourhood Plan.

¹'A Practical Guide to the Strategic Environmental Assessment Directive' <u>https://www.gov.uk/government/publications/strategic-</u> <u>environmental-assessment-directive-guidance</u> (ODPM 2005)

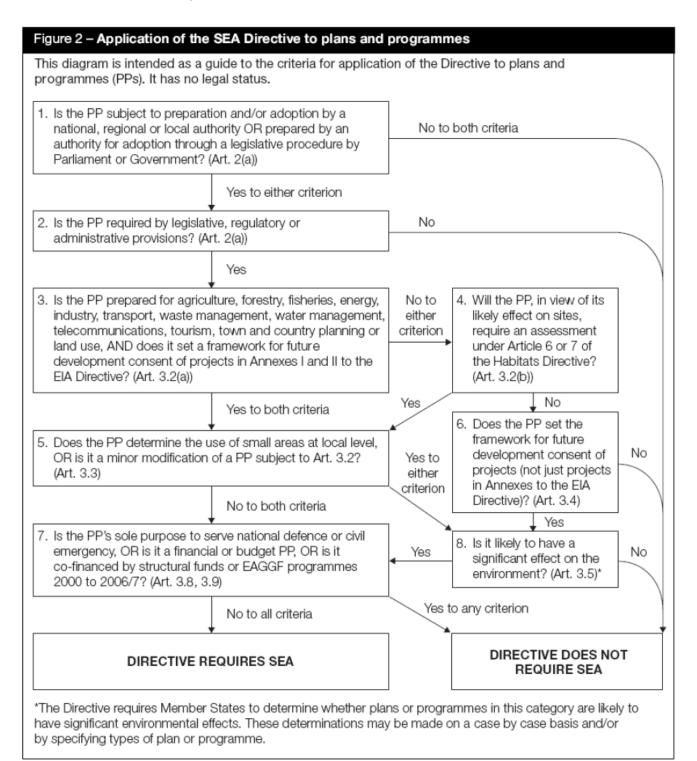
3. Criteria for Assessing the Effects of Neighbourhood Development Plans

- 3.1 Criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC are set out below²:
 - 1. The characteristics of plans and programmes, having regard, in particular, to:
 - the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources,
 - the degree to which the plan or programme influences other plans and programmes including those in a hierarchy,
 - the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development,
 - environmental problems relevant to the plan or programme,
 - the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).
 - 2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:
 - the probability, duration, frequency and reversibility of the effects,
 - the cumulative nature of the effects,
 - the transboundary nature of the effects,
 - the risks to human health or the environment (e.g. due to accidents),
 - the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),
 - the value and vulnerability of the area likely to be affected due to:
 - special natural characteristics or cultural heritage,
 - exceeded environmental quality standards or limit values,
 - intensive land-use,
 - the effects on areas or landscapes which have a recognised national, Community or international protection status.

² Source: Annex II of SEA Directive 2001/42/EC

4. Assessment

4.1 The diagram below illustrates the process for screening a planning document to ascertain whether a full SEA is required.



4.2 The table below shows the assessment of whether or not the Newton Longville Neighbourhood Development Plan will require a full SEA. The questions below are drawn from the diagram above which sets out how the SEA Directive should be applied. The Parish Council has given the District Council an early indication of the scope of the plan and the policy areas they intend to cover. This is what the screening is based on.

Change	N/	D
Stage	Y/ N	Reason
1. Is the plan subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Ŷ	The Neighbourhood Development Plan will be adopted by a Local Planning Authority, Aylesbury Vale District Council (or post 31 March 2020, the new Buckinghamshire Council)
2. Is the plan required by legislative, regulatory or administrative provisions? (Art. 2(a))	N	The Neighbourhood Development Plan is an optional plan produced by Newton Longville Parish Council.
3. Is the plan prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))	Ν	The Neighbourhood Development Plan is prepared for town and country planning purposes, but it does not set a framework for future development consent of projects in Annexes I and II to the EIA Directive (Art 3.2(a)).
4. Will the plan, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))	Ν	There are no areas of Natura 2000 sites (Special Areas of Conservation or Special Protection Areas) in the parish. The nearest such sites are Moneybury Hill and Ivinghoe Common (Chiltern Beechwoods SAC) 25km away to the south. There are 15 sightings of notable species in the parish which have UK and EU significance - 8 common pipistrelles, a soprano pipistrelle, two bats, a Great Crested Newt and three other pipistrelles. These are all protected species under Schedule 4 of the EU Habitats Directive 1992. In terms of Natura 2000 sites however there would not be any impact on the Natura 2000 sites given the distance to the nearest SAC. This impact can be subject to re-screening at the Pre Submission, Submission and Referendum stages of the plan.
5. Does the plan determine the use of small areas at local level, OR is it a minor modification of a plan subject to Art. 3.2? (Art. 3.3)	Y	The scope of a Neighbourhood Plan indicated by the parish council does intend to allocate specific sites for new housing and also road infrastructure and set a housing target to be met by provision within the neighbourhood plan. There is potential for housing sites to be of a significant size compared to that so far

		committed in the village.
6. Does the plan set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3.4)	Y	The Neighbourhood Plan scope does intend to set a framework for future development consent of projects, including land allocated for housing. There is potential for housing sites to be of a significant size compared to that so far committed in the village. The plan's scope is intending to also provide new road infrastructure.
7. Is the plans sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9)		The purpose of the Neighbourhood Plan is not for any of the projects listed in Art 3.8, 3.9.
8. Is it likely to have a significant effect on the environment? (Art. 3.5)		The Neighbourhood Plan scope is intending allocating housing sites for development which could be of a significant size compared to what is committed or completed in recent years in the village and the plan scope is intending to also provide new road infrastructure.
1 (a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources	Y	The Newton Longville Neighbourhood Plan is intended to set out a spatial vision for the designated Neighbourhood Area and provide objectives and policies to guide sustainable development coming forward. The plan scope is intending to allocate housing sites for development and consider options for allocating new road infrastructure.
1 (b) the degree to which the plan or programme influences other plans or programmes including those in a hierarchy.	Ŷ	The Newton Longville Neighbourhood Plan, where possible, will respond to rather than influence other plans or programmes. A Neighbourhood Plan can only provide policies for the area it covers while the policies at the District and National level provide a strategic context for the Newton Longville Neighbourhood Plan to be in general conformity with. However, there could be a direct impact on other plans in neighbouring areas if the new housing or road infrastructure is in proximity to the neighbouring areas.
1 (c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development	N	Proposals will need to be set out in the Newton Longville Neighbourhood Plan to balance environmental, social and economic considerations of sustainable development.
1(d) environmental problems relevant to the plan	Y	The Newton Longville Neighbourhood Plan scope is intending to allocate land for development and road infrastructure and has

1 (e) the relevance of the plan or	N	 the potential to give rise to significant additional car movements. There are no Air Quality Management Areas within or near to the Neighbourhood Area. It is not known yet whether or not the plan will propose mitigation to contain or offset environmental impacts. The Newton Longville Neighbourhood Plan is to
programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection)		be developed in general conformity with the AVDLP 2004) saved policies (Vale of Aylesbury Local Plan once adopted expected end 2019), the Minerals and Waste Core Strategy (2012) Plan and national policy. The plan has no relevance to the implementation of community legislation.
2 (a) the probability, duration, frequency and reversibility of the effects	Y	The plan scope is intending to allocate housing sites for development and consider options for allocating new road infrastructure. As a precaution until more detail comes forward on the specific policies and proposals the screening outcome is as 'Yes' for potential effects.
2 (b) the cumulative nature of the effects	Y	The plan scope is intending to allocate housing sites for development and consider options for allocating new road infrastructure. There could be cumulative effects depending on the precise nature of the proposals. As a precaution until more detail comes forward on the specific policies and proposals, the screening outcome is a 'Yes' for potential effects.
2 (c) the trans boundary nature of the effects	Y	It is possible there will be effects from the allocated site (s) or infrastructure or both, depending on where they are located in relation to the parish boundary.
2 (d) the risks to human health or the environment (e.g. due to accidents)	N	No risks have been identified.
2 (e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	Y	The Neighbourhood Area covers an area which is 745 ha and contains a population is of 1,846 residents (2011 census). At this stage the size of land affected by new proposals and their location is not known but there is the potential for housing sites to be of a significant size compared to that so far committed in the village. The plan is intending to also provide new road infrastructure. As a precaution until more detail comes forward on the specific policies and proposals, the screening outcome is a 'Yes' for potential effects.

 2 (f) the value and vulnerability of the area likely to be affected due to: (i) special natural characteristics or cultural heritage (ii) exceeded environmental quality standards (iii) intensive land-use 	Y	The Newton Longville Neighbourhood Plan proposals could (such as impacts of development of a new housing site (s) and road infrastructure) adversely affect the Newton Longville Conservation Area and its cultural heritage. As a precaution until more detail comes forward on the specific policies and proposals the screening outcome is as 'Yes' for potential effects.
2 (g) the effects on areas or landscapes which have a recognised national, community or international protection status	Ν	The Newton Longville Neighbourhood Development Plan Area is not within an area or landscape of a nationally, internationally or community status.

5.0 FINAL Screening Outcome - SEA Needed

- 5.1 The scope for a Newton Longville Neighbourhood Development Plan is intending to consider allocating sites for housing development, which could be of a significant size compared to sites committed or completed since 2013. The plan is also likely to identify a housing target or even a target for other forms of development. There is also likely, based on current intentions, for new road infrastructure to be allocated in the plan which could have significant environmental effects.
- 5.2 This screening opinion can be revisited once more detail comes forward about any policies to control environmental effects and identification of any areas of development restraint. When taken together (as is required by law) with relevant policies from the Local Plan policy and national planning policy, it is considered that the plan currently intended would be likely to give rise to significant environmental effects.
- 5.3 Therefore <u>a Strategic Environmental Assessment (SEA) is needed</u> and the qualifying body must demonstrate how its plan will contribute to achieving sustainable development.
- 5.4 AVDC recommends carrying out a Sustainability Appraisal (SA) of the proposed neighbourhood plan and the neighbourhood plan proposed to be submitted to AVDC, incorporating the requirements for SEA. The SA should make it clear how the SEA regulations (Environmental Assessment of Plans and Programmes Regulations 2004) as replaced, have been met.
- 5.5 Although Natural England consider an SEA is not required, AVDC is of the view that an SEA is needed as there could be significant environmental impacts despite the lack of environmental designations and even if the level of housing other forms of development is less than the threshold Natural England refer to, of 500 additional dwelling sites or 1000 sqm of commercial sites. At this very early stage, before exact specifics of the plan are drawn up, the Council is of the view a precautionary approach is taken and an SEA is carried out.

Appendix – Statutory Consultation Responses

- 1. Environment Agency No response received
- 2. Historic England No response received
- 3. Natural England Response received 01.08.19 see below

Date: 01 August 2019 Our ref: 277338 Aylesbury Vale District Council **BY EMAIL ONLY**

Customer Services Hornbeam House Crewe Business Park Electra Way Crewe Cheshire CW1 6GJ T 0300 060 3900

Dear David Broadley,

Planning Consultation: Newton Longville Neighbourhood Plan SEA Screen

Thank you for your consultation on the above dated 18 July 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.

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 Newton Longville Neighbourhood Plan SEA screening we note that;

 there are no designated sites or protected landscapes within the impacts zones of the Neighbourhood Plan area and there are less than 500 additional dwelling sites or 1000 sqm of commercial sites proposed.

As a result we disagree with the assessment that the Neighbourhood Plan requires an SEA. Natural England considers this Neighbourhood Plan to be unlikely to have significant environmental effects on designated sites or protected landscapes.

The decision however, is down to Aylesbury Vale DC as the competent authority.

We would like to draw your attention to 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). Please ensure that any development policy in your plan includes wording to ensure "all development results in a biodiversity net gain for the parish".

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 exemplar. We would recommend you considering this document, when reviewing yours.

Further Recommendations

Natural England would also like to highlight that removal of green space in favour of development may have serious impacts on biodiversity and connected habitat and therefore species ability to adapt to climate change. We recommend that the final neighbourhood plan include:

- Policies around connected Green Infrastructure (GI) within the parish. Elements of GI such as open green space, wild green space, allotments, and green walls and roofs can all be used to create connected habitats suitable for species adaptation to climate change. Green infrastructure also provides multiple benefits for people including recreation, health and well-being, access to nature, opportunities for food growing, and resilience to climate change. Annex A provides examples of Green Infrastructure;
- Policies around Biodiversity Net Gain should propose the use of a biodiversity measure for development proposals. Examples of calculation methods are included in Annex A;

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

Yours sincerely, Eleanor Sweet-Escott Lead Adviser Sustainable Development Thames Team

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

Natural Environment Information Sources

The Magic1 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 here₂.

1 http://magic.defra.gov.uk/

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

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

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

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found here₃. 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 here4.

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 website₆, which contains more information about obtaining soil data.

Natural Environment Issues to Consider

The National Planning Policy Framework⁷ sets out national planning policy on protecting and enhancing the natural environment. Planning Practice Guidance⁸ 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.

Landscape

Paragraph 172 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 here₉), 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.

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

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

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

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

13 https://www.gov.uk/government/collections/biodiversity-offsetting#guidance-for-offset-providers-developers-and-local-authorities-inthe-pilot-areas Note; the 'Guidance for developers' and 'Guidance for offset providers' documents provide a calculation method. 14 http://www.environmentbank.com/impact-calculator.php , and

http://www.google.co.uk/url?sa=t&rct=j&g=&esrc=s&source=web&cd=3&ved=0ahUKEwj7vcbl0aDQAhVMDcAKHb8IDEUQFggsMAl&url=http%3A%2F%2Fconsult.welhat.gov.uk%2Ffile%2F4184236&usg=AFQjCNFfkbJIJQ_UN0044Qe6rmiLffxckg

Priority and protected species and habitat

You'll also want to consider whether any proposals might affect priority species (listed here11) or protected species. Natural England has produced advice here12 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 175 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 170 states the requirement for *"minimising impacts on and providing net gains for biodiversity"*. Suitable methods for

calculating biodiversity net gain can 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.

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 170. For more information, see our publication Agricultural Land Classification: protecting the best and most versatile agricultural land₁₅.

15 http://publications.naturalengland.org.uk/publication/35012

16 http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-publicrights-of-way-and-local-green-space/local-green-space-designation/

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 this₁₆₎.
- 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).

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.