

Response to Local Plan Policy BG/BG: Biodiversity and geodiversity from John Meed

I welcome the central importance of Policy BG/BG: Biodiversity and geodiversity in the local plan.

Biodiversity net gain

The commitment to 20% BNG is excellent, as is the statement that 'biodiversity net gain should be delivered on-site where possible'. I do have three concerns though:

Firstly, baseline survey work will need to be sufficiently detailed and thorough to allow rigorous assessment both of potential and actual net gain or loss. I am conscious through my own long-term survey work of the amount of time that is needed to build up anything approaching a clear picture of the biodiversity present. Without such a time-consuming commitment there is a real risk of missing important elements of an ecosystem, and consequently failing to set an accurate baseline against which biodiversity gain or loss can be assessed.

Secondly, while I understand the reasons behind 'contributions towards off-site, larger scale projects' and indeed can see value to this, I am concerned that this can offer both an easy opt out for landowners and developers, and a justification for planners to support contentious new development and removal of land from green belt.

In particular, Objective 3 talks about circumstances 'where it is agreed that off-site habitat measures would bring greater biodiversity benefits than on-site measures'. We need clarity about who would agree this, with what consultation, and when in the process.

I am particularly interested in the context of Policy S/CBC as I know this area intimately (see my specific response to this policy). In an area like this, should development be deemed sufficiently exceptional to justify the release of green belt, there is scope for what I would call 'near-site BNG' where improvement of habitats on adjoining land would be essential to provide a home for displaced red list species. Such an approach should be considered carefully for other preferred sites for development before opting for off-site BNG.

I would therefore propose including additional wording such as 'near-site via habitat improvement on adjoining land' in Objective 2.

Thirdly, I am also conscious that, while the BNG metric does indeed focus on habitats rather than species and 'is considered a suitable proxy for widespread species found in typical examples of different habitats', 'scarce and protected species are likely to need separate consideration to the biodiversity metric'. The quotes come from *Biodiversity net gain and local nature recovery strategy regulatory impact assessment* (Defra, 2019, pp 15-16) which also states that 'local and special characteristics need to be considered'.

Policy BG/BG at present makes no mention of this, nor of the need 'to take account of particular species in a locality that give habitats their local distinctiveness'. This is an important omission that should be remedied to ensure that the Local Plan reflects government requirements. I would propose an additional objective along these lines:

- Where a locality contains species of high conservation concern, a separate mitigation or compensation package will be required for the species in question, and this should be close to the areas impacted. A developer would need to prove that the development will not impact negatively on these species and will ideally increase their populations.

John Meed, December 2021

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