

MATTER 1.

Q 1.5 Is the Habitats Regulations Assessment adequate and does the Plan include all the recommendations identified in the assessment as necessary to ensure compliance with the Habitats Regulations? Is it robust and convincing in its conclusion that the Plan will have no significant effects on the integrity of any European sites? In particular, how will cumulative effects be addressed on a site by site basis?

In my Regulation 19 Pre submission to the CLLP, I focused on the importance of Biodiversity & Ecology in all Planning issues.

1. I am concerned about the current apparent 'loophole' with lack of Biodiversity 'net gain' in 'self build' dwellings in in the Biodiversity and Ecology section of the CLLP proposals and that the 'loophole' can be closed by the proposals suggested in the plan.

MHCLG originally proposed 'self-build' dwellings to be constructed in order to encourage development, however in the current Biodiversity & Ecology emergency with England being the most nature depleted country of the four nations of the UK and also in Europe, it is more essential than ever that the 'loophole' is closed.

2. Also the question of Biodiversity 'net gain' off site should be a last resort solution or avoided altogether because of the risk of the loss of protected species from an historical site (ecologically speaking). Builders/developers must follow a specific procedure by setting up a Section 106 agreement with the LPA with any off site ecological compensation being put in a Biodiversity Net Gains Register.

3, A Biodiversity Strategy in was set up in 2022 and a Biodiversity Action Plan in established in 2023.

SRBC does not seem to discharge its responsibilities under the Natural Environment Rural Communities' Act (NERC) of 2006 to ensure that builders/developers comply with Wildlife Legislation and also strategies in the current local plan and undertake comprehensive ecological surveys and submit mitigating proposals to ensure that all Wildlife species survive and thrive during and after development.

4. The Agricultural Land Classification (ALC) provides a method for assessing the quality of farmland to enable informed choices to be made about its future within the planning system. It helps to underpin the principle of sustainable development. This is classified into five grades with Grade 5 being the best quality and Grade 1 the poorest. It helps to ensure that the best and most versatile land is excluded from development.

I am unsure whether Planning have actually enforced this regulation in certain planning applications, in particular Permission in Principle (Stage 2 TDC).