

MATTER 12 (Environmental issues in general).

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).

5. It is important to emphasise that the National Planning Policy Framework (NPPF) 'net gain for Nature' still applies to development ecological mitigation in addition to Biodiversity Net Gain (BNG).

6. I think that 'Nature Friendly' developments instead of the construction of what resemble 'concrete jungles' in proposed developments especially in in semi-rural and rural areas, by encouraging the planning department to include nature friendly design features like building bat and bird boxes and swift boxes or bricks into house structures; creating hedgehog highways (to prevent further decline in hedgehog numbers) and wildlife highways for habitat connectivity; designing nature friendly gardens and verges; installing green roofs and walls; retaining existing natural features like mature trees, the roots of which (along with swales - shallow channels which can be incorporated into landscaping) can improve water quality and protect against floods.

Mandatory standards incorporating minimum nature friendly measures could be supported by local councils OR even better encourage the council to include nature friendly design features in its local plan and go beyond national minimum requirements, as suggested by the RSPB.