

To whom it may concern,

Herewith **Exmouth Wildlife Group's** consultation submission in response to specific questions in the ISSUES AND OPTIONS document:

- We have met with (and contacted) many planners and councillors over the last three years.
- Whilst we have received favourable support, the EXISTING Local Plan did not have the provision for a change in policy regarding biodiversity enhancements, that formed the basis of our discussions.
- We have been informed that the best way to instigate POLICY change lay with the review of the local plan that is currently underway.
- Therefore, here is our submission to that process:

Question 21 - Net gains in biodiversity

Exmouth Wildlife Group wishes to SUPPORT the following part of the Issues and Options document:

- *"Promoting and **incorporating wildlife friendly schemes and elements into developments**" (Issues and Options: 8.8)*
- *"**..net increase in biodiversity of at least 10%.**" (Issues and Options:10.5)*
- *"Offer increased protection from development of land " (10.8)*
- *"We are considering taking a new approach with more emphasis on **how beautiful places and buildings can be planned at the outset through the local plan rather than relying on subsequent master planning or individual planning applications.**" (Issues and Options: 8.5)*

THUS our group believes that the following biodiversity measures (set out below), that are now **STANDARDS** in a growing number of councils should form part of the NEW APPROACH:

- **25% tree cover**
- **Hedgehog highways in all fences**
- **1:1 bird/ bat brick to each dwelling (referencing RSPB guidelines)**
- **SUDS**
- **Hedge retention (except for transport necessities) / Green corridors**
- **Wildflower meadows / verges**
- **30% open space** ("Set minimum standards for the amount and quality of green space in development sites." (10.8))

Having these standards **EXPLICIT** as part of the LOCAL PLAN and transparent, **BEFORE** any planning applications are submitted for outline consent, allows all stakeholders (planners, councillors, the public and developers) to approach development proposals from a level playing field.

Government Policies:

Building Better, Building Beautiful Commission
Government response to the Living with Beauty report (Jan 2021) *Ministry of Housing, Communities and Local Government*

Policy Proposition 33: regreen streets and squares (Page 50-51)

Other actions which the government should support and encourage should include:

- **Bricks for bees and birds in new build homes;**
- **Greenery low to the ground to capture particulate matter;**
- **The retention of existing hedges in greenfield developments and planting of new hedges;**
- **The designation of some streets as ‘green corridors’;**
- **New garden squares to provide safe and easy-to-access greenery for residents; and**
- **Sustainable drainage systems (known as SUDS) to integrate urban drainage better into natural drainage systems**

Government response

The Government agrees that a range of green infrastructure and habitat features should be incorporated into new developments and existing urban areas to **improve biodiversity**, enhance the quality and enjoyment of green spaces and support climate change mitigation and adaptation.

Our Planning Practice Guidance for the Natural Environment recognises that relatively small features such as **incorporating swift bricks and bat boxes in developments** can often achieve important benefits for wildlife.

The National Planning Policy Framework supports the use of **sustainable drainage systems (SuDS)** in ways that provide multi-functional benefits.

The introduction of **mandatory biodiversity net-gain to the planning system** through the Environment Bill, due to achieve Royal Assent by mid-2021, will help to secure a range of measures to protect and enhance biodiversity and create opportunities for nature and green spaces through new development.

These measures will encourage development to **retain and enhance existing biodiversity features such as trees and hedges, as well as securing new green infrastructure.**

The Environment Bill also introduces provisions requiring the development of Local Nature Recovery Strategies (LNRS) across England.

LNRS will be an important tool in driving coordinated, practical and focused action to help nature on a local level.

These will form the national Nature Recovery Network that benefits people, wildlife and the economy and **will pave the way to allow local authorities to establish if and where 'green corridors'** will deliver the best outcomes for nature recovery in their areas.

Important though this is, there is more that can be done. **The national framework of green infrastructure standards, which is being developed by DEFRA and Natural England, will provide advice to local authorities, developers and other stakeholders on how to ensure that green infrastructure provision is of a sufficient quantity, quality and accessibility to provide multiple social, environmental and economic benefits. In addition, the National Model Design Code includes**

guidance on landscaping and promotes the provision of accessible, high quality green spaces.

It also provides guidance

on habitat creation, including the need to consider strategies for enhancing natural habitats, such as through the use of bird boxes, bee bricks and hedgehog highways.

Question 22 - Additional natural environment policy objectives

"1.Support designation of open spaces (for example green wedges) ...

2. Policies in the plan for wildlife friendly spaces that respond to the impacts of a changing climate.

4. Placing greater emphasis on landscape character assessment and evaluation of landscape impacts when determining planning applications. This may require us to develop new designations for some areas or define zones of high, medium and low sensitivity.
5. Offer increased protection from development of land that may have some biodiversity importance including lower grade agricultural land and previously developed land.
6. Set minimum standards for the amount and quality of green space in development sites.
7. Encourage new and existing green spaces to be more wild and nature friendly and less manicured and carefully managed." (10.8)

ALL OF THE ABOVE IS ESSENTIAL FOR EDDC TO TO MEET THE CLIMATE AND BIODIVERSITY EMERGENCIES, HEAD ON.

MANY OF THE ABOVE POLICIES CORRELATE WITH OTHER CHAPTERS

Question 32 - And finally...?

"We are considering taking a new approach with more emphasis on how beautiful places and buildings can be planned at the outset through the local plan rather than relying on subsequent master planning or individual planning applications."

(Issues and Options: 8.5)

The emphasis on design is echoed in the following extract from Ministry, Housing and Local Government PLANNING NEWSLETTER No. 1 of 2021

"In response to the recommendations of the Building Better, Building Beautiful

Commission... The changes will make beauty and place making a strategic theme in the NPPF, **set out the expectation that local authorities produce their own design codes and place an emphasis on granting approval to schemes that are well-designed.**

Proposed changes also include an expectation that all new streets should be tree lined and that there are improvements in biodiversity and access to nature through design. "

Thank you

Exmouth Wildlife Group

