

Question 21 - Net gains in biodiversity

Paragraphs 10.5 to 10.7 of the Issues and Options report explains the new approach of quantifying the potential impact of development on biodiversity to inform planning decisions and ensure that there is a 'net gain'. Question 21 sought views on the approach you would favour to gain biodiversity improvements.

Option 1 - On-Site provision

Option 2 - Secure the habitats locally

Option 3 - Pay a cash tariff towards a strategic delivery scheme

Option 4 - A combination of the above

Option 5 - None of the above or an alternative

Those that made comment said.

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FS-Case-297949549	Martin Thurgood	option1	There is an obvious need to ensure that developers pay more than lip-service to such important policies. Requiring biodiversity gains at developments (and not elsewhere through some form of 'buy-off') is essential to achieving the policy objective.
FS-Case-299321852	William R Palmer	option4	Not developing further into agricultural land would benefit biodiversity
FS-Case-299861217	Heath Nickels Exmouth Wildlife Group	option4	<p>"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)</p> <p>"Offer increased protection from development of land " (10.8)</p> <p>"Promoting and incorporating wildlife friendly schemes and elements into developments" (Issues and Options: 8.8)</p> <p>"..net increase in biodiversity of at least 10%." (Issues and Options:10.5)</p> <p>The biodiversity measures set out below are now STANDARD in a growing number of councils and, increasingly, developers:</p> <ul style="list-style-type: none"> • 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) • Wildflower meadows • 30% open space ("Set minimum standards for the amount and quality of green space in development sites. (10.8))
FS-Case-300714787	Blank - No Name	option4	<p>Each area is different.</p> <p>I do feel that corridors need to be made for wildlife and an E Devon plan for wildlife and biodiversity needs to be made. Wood lands need to be linked along corridors;</p> <p>Present woods and green areas should not be included in the plans for new housing so that NEW areas are created e.g. by enlarging a present woodland, not cynically including a well established one as part of the 'off setting' to biodiversity damage of new developments. This has been seen locally where the Percy Walkley Wood has been included as part of SANGS for Cranbrook. It should not. Cranbrook should provide EXTRA wood land, not take what is already there and include it in its plans.</p>
FS-Case-301179421	Mark HUMPHRIES	option1	every development must enhance what is already there, you should not be allowed to buy off, pay a subsidy to detriment of the existing environment
FS-Case-302912562	Paul Gamble	option2	Preference is for a combination of 1 and 2. How often are cash contributions actually turned into biodiversity projects elsewhere? Surely if there is an impact

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			from a new site then the mitigation should be as close to that impact as is practically possible.
FS-Case-303403737	Mr&Mrs Wood	option1	On site provision AND enhancement. Not looking at providing the minimum, but the maximum for the resident wildlife.
FS-Case-305076755	Jeff Powley	option5	Biodiversity is excellent in East Devon, particularly with the pebble heaths. Stop interfering with current arrangements simply for the sake of employing more staff.
FS-Case-305765435	Aurora Aykroyd	option4	I don't think that developers should be allowed to neglect biodiversity within their bills by paying a fee and essentially passing on that responsibility when they have every opportunity and available cash flow to explore and create innovative plans. There needs to be a greater interest in how things are planted what is planted on community developments. As well as considering That kind of site they are building on such as those that come with environmental issues such as flooding. As well as making small apartment blocks more environmentally friendly this can be perhaps be in the way energy is managed within the property having rooftop garden space or solar panels on the roof. there could be gym equipment that generates energy from its use.
FS-Case-306175815	chistopher Burton	option4	Difficult to give a view as I feel it is dependent on the scale of changes that the development site would bring to a number od species
FS-Case-306237729	Geoff Crawford	option4	Not enough emphasis and control is placed in the environmental impact of development, not just on the development itself but on the area surrounding and link roads that are impacted but development vehicles and traffic.
FS-Case-306256851	Simon Rennie		no comment see objective 10 section 12 questions
FS-Case-306308166	Sylvia Meller	option5	Again, this is economy against environment. This should not even be a question. We need to put all focus on saving existing green spaces. When existing houses/buildings are re-developed the focus must be on biodiversity and implement as much nature by creating green walls/roofs, gardens, parks, etc
FS-Case-306915743	Catherine Kingham	option5	Habitats should be secured locally, and where there are animals, birds, insects - wildlife of any sort including plant life - we should maintain the status quo, and never develop on such land. Development is creeping into every aspect of life, and mostly it is the developers and landowners who gain financially to the greater loss of everyone else.
FS-Case-307126895	Daren Richards	option5	This should be worked out at the planning stage of new development
FS-Case-307389332	Stephen Crook	option5	No greenfield development.
FS-Case-307991316	Susan Cooper	option1	This should also mean that there should be an emphasis on retaining and enhancing existing biodiversity on or immediately adjacent to the site. This has benefits for the wellbeing of residents if biodiversity is retained and enhanced near to where people live. This approach should be adopted together with a more wildlife friendly approach to new developments. This approach reduces car journeys as people have more green spaces and wildlife friendly environments near to where they live and this is more environmentally sustainable.
FS-Case-308046866	Simon Greenslade	option2	Development and net gain biodiversity should go hand in hand
FS-Case-308049835	Peter Duncan	option4	No strong opinion on this or full understanding of the benefits.
FS-Case-308071816	Gillian Cameron-Webb n/r	option1	The following are simple to deliver but provide massive benefits so developers should be COMPELLED to do the following to protect & enhance the wildlife & habitats which are so important to us all: <ul style="list-style-type: none"> - one integral swift brick AND solitary bee boxes, bee bricks and 'insect houses' for every unit/residential dwelling. More for larger buildings; - permeable, ideally planted boundaries (hedges or fences with small gaps at the base) to permit movement of wildlife; - green walls and living roofs; - no glass paneling where it causes a danger to birds (e.g. in front of hedges); - retain existing and plant new native trees, shrubs and hedges to create green corridors for wildlife to move through the development to adjacent habitats.

New houses must be built far enough away from trees to prevent future root

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			damage. If an older house is experiencing root damage, cutting down a mature tree must not be an option, they should install root guards or some other less damaging solution.
FS-Case-308072238	Robert Cooper	option1	If valuable habitat is going to be lost then the scheme should be turned down. Making an artificial habitat up the road does not work.
FS-Case-308105398	Jane Ashton Please choose	option4	Although 4. seems like a 'woolly' option, it might be the only realistic one. Sadly, developers and landowners often later appeal against the proportions/amounts agreed as with affordable housing. In the past, EDDC, through inefficiency or for some other reason, hasn't always followed up on certain payments and agreements, S106/CIL being one example.
FS-Case-308168070	Norman Reeder	option4	A single approach could never address all the possible means by which biodiversity could/should be delivered
FS-Case-308268315	Tracy Simmons Cranbrook Town Council	option5	The Committee considered none of the options as adequate because none of the suggested options in the issues and options report provided a net gain, only the conservation of the status quo. Developers should be incentivised to provide net gains in biodiversity, similar to the mechanisms through which farmers were incentivised.
FS-Case-308288718	Emily Davis	option5	<p>Just stop building on them! Yes two-thirds of East Devon falls into an AONB and THAT IS WHY PEOPLE COME HERE. Until you fix the underlying problems of house buying/letting under the current situation throwing up more crap houses is not going to solve this and it will erode our natural biodiversity further.</p> <p>It's our ANOB status that brings in tourism and separates us from everywhere else. It must be celebrated and supported and not further eroded by unscrupulous developers.</p> <p>Yes, some housing is needed, but building more won't stop the problems already there - it will merely extend them.</p>
FS-Case-308326362	Peter Eastwood N/A	option2	Vital
FS-Case-308520714	Peter Brain	option2	10.6 puts it well.
FS-Case-308655667	Jan Gannaway Exmouth Wildlife Group + Active Travel Exmouth	option1	<p>Option 3 is an absolute last resort. We should aim for the optimal biodiversity protections and include biodiversity in all developments - 25% tree cover, 30 % green space, inbuilt nesting for birds, bats, bees, wild-flower areas, ponds hedgehog highways etc so that residents benefit from living close to nature. A lighting management plan should be included in all new developments. See Langarth in Cornwall https://www.ahr.co.uk/Langarth-Garden-Village "Langarth Garden Village aspires to a 20% biodiversity net gain across the whole site".</p> <p>or Kingsbrook where Barrett have worked with RSPB RSPB web site - Kingsbrook, a new era in wildlife-friendly housing</p>
FS-Case-308816947	Heather Elgar Woodland Trust	option4	<p>The delivery of biodiversity net gain must follow the mitigation hierarchy, which first seeks to avoid harm.</p> <p>Irreplaceable habitats, including ancient woodland and veteran trees, must be protected in line with NPPF para 175c, and cannot be compensated for as they are irreplaceable. Natural England's Standing Advice clearly specifies that any compensation must NOT be considered in determining any wholly exceptional public benefit.</p> <p>Biodiversity net gain should be delivered on site where possible, and then locally. We urge that East Devon sets strong policies and processes to ensure that biodiversity net gain funding is retained within the district (or potentially county) area, rather than spent nationally. We welcome a strategic approach where biodiversity net gain funds are pooled to deliver strategic objectives for nature recovery at the landscape scale.</p> <p>We urge the council to require above the minimum 10% Biodiversity Net Gain set by government – we recommend at least 20%.</p>
FS-Case-308930499	Lisa Bowman Exmouth Town Council	option4	Members felt that in order to achieve a net gain in biodiversity, sites would have to be assessed on an individual basis. In members' experience it was difficult to enforce legal agreements with regards to long term maintenance.

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FS-Case-308950804	Jon Burgess Forestry Commission	option4	<p>The direction of travel for Net Gain in Biodiversity is to stress that the 10% is an absolute minimum and the ambition should be for a higher figure as a starting point, reducing to 10% for the most socially useful development such as affordable housing.</p> <p>It is also important to consider Environmental Net Gain which will consider the full range of Ecosystem Services provided by the measures. These may include carbon sequestration, flood alleviation, landscaping, air and water quality improvements; when all measures are considered tree planting and woodland creation become the most logical, beneficial and cost effective option and should be heavily favoured with the Local Plan for these reasons.</p> <p>If habitat is lost then it must be replaced on a like-for-like basis where it is a priority habitat, this will help ensure that the Plan meets the government's aim of no net loss of woodland and will help ensure we move forward in the target of woodland creation.</p>
FS-Case-309114723	Robert Anthony	option2	Cash tariffs would be creamed off for other uses.
FS-Case-309216926	Ivor Sims	option5	It just increases the cost of developments which is then passed on to the consumer.
FS-Case-309254127	J Nickels	option4	<p>The biodiversity measures set out below are now STANDARD in a growing number of councils and, increasingly, developers:</p> <ul style="list-style-type: none"> • 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) • Wildflower meadows • 30% open space ("Set minimum standards for the amount and quality of green space in development sites. (10.8))
FS-Case-309293778	Paul Smith	option4	<p>Protection of natural environment and existing biodiversity from development is invariably better solution than re instatement.</p> <p>I note that the Natural Environment & Rural Communities Act 2006 places a duty upon public authorities to have regard to conserving biodiversity in the exercise of their function.</p> <p>The Environment 2020 Bill will strengthen and empower that duty to cover compliance with the enhancement of bio diversity, on development sites by a 10% net gain as well as conservation, and the authority must evidence a strategic assessment of actions necessary to comply . A 5 yearly assessment report must be published to verify actions taken.</p>
FS-Case-309383731	Val Ranger	option1	<p>If we are taking the local climate change emergency seriously, we should not be insisting that people travel to outside space. so called 'mitigation' is a joke. Developers constantly duck out of 'promises' to provide on site bio-diversity improvements and I cite King Alfred Way as an example of this, with the promise of a 'community orchard' that never materialised, along with the doctors surgery that was reneged upon. At the same site it was suggested that dog walkers might want to drive to Joneys Cross to walk their dogs, a ridiculous suggestion. I am sure there are numerous other examples.</p> <p>We should not be building sites on flood planes</p> <p>More trees must be planted</p>
FS-Case-309401093	Philip Jordan	option4	Any development will harm 'nature', this can not be helped and the tick box culture we now seem to be adopting that while washes the simple fact that developments will be ecologically friendly, is a farce.
FS-Case-309456508	Ian Birch	option4	I agree with the government's approach, insisting on these being followed - reluctantly - in descending order of favourability i.e. 1 is default, then 2 if 1 not feasible, etc.
FS-Case-309478869	Rosemary Birch	option2	See my comments in the previos box, Q20. Also, I could imagine that some sites are very rich in biodiversity already and if building on such a site (hopefully not) that it would be difficult to increase the biodiversity anyway.

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FS-Case-309529320	John Stuckey	option1	And to be in place before the final tranche of properties are released for sale.
FS-Case-309583339	Andy Bourne	option1	Existing woodlands, ponds and meadows must be incorporated as corridors in any new development.
FS-Case-309588076	Carol Jay Transition Exmouth	option1	All development should include green corridors to avoid shrinking pathways for pollinators, for example, still further . All offset must be genuine - a few new saplings do not in any way make up for the loss of ancient woodland for example . The biodiversity measures set out below are now STANDARD in a growing number of councils and, increasingly, developers: <ul style="list-style-type: none"> • 25% tree cover • Hedgehog highways in all fences • 1:1 bird/ bat brick to each dwelling (referencing RSPB guidelines) • SUDS - sustainable drainage • Hedge retention and creation Wildflower meadows • 30% open space ("Set minimum standards for the amount and quality of green space in development sites. (10.8)) Option 3 is a last resort - it allows developers to write a cheque to the council to avoid planning for biodiversity net gain and encourages them to squish in as many houses as possible while paying a cheque - it's not acceptable and is strongly discouraged in the UK Gov Net Gain policy
FS-Case-310456969	Penny Kurowski	option4	Ideally I would like option 1, but this is not always feasible; a mix of options 1 and 2 is what I really feel is the best way
FS-Case-310604804	Sarah Alana Sayers Farringdon Parish Council	option4	Natural Environment (FNP) P14 7.9 " The community has made it plain at recent consultation events that it feels strongly that local countryside should be protected and not just because of the rural character and lifestyle it provides. The agricultural value of the countryside, and the diverse ecology it provides habitats for is also appreciated.." 7.10 EDDC has encouraged the Parish Council to promote a programme of green infrastructure enhancements in the wake of the NP, such as tree planting and creating new woodlands to link with the existing. Safeguarding the Natural Environment Policy Farr2 7.12 "Within this plan we also recognise the value of trees, woodlands and hedgerows as habitats and part of the network of wildlife corridors and the provision of stepping stones that connect them are an important part of the community's sustainability agenda.
FS-Case-310675340	Bec Davey Axmouth Parish Council	option2	The estuary (Marine Conservation Zone) and SSSI's must be protected
FS-Case-311523569	Kevin Clarke	option2	If not suitable on site then locally and direct provision from the development so people can see the link rather than money.
FS-Case-311693209	Jeremy Woodward Vision Group for Sidmouth	option4	Clearly, the best provision would be on-site, but practically speaking, this might not be possible, in which case other options will have to be found. Whereas "this is potentially a serious challenge particularly to some of the larger and more urban centric developers", in relatively rural East Devon, this should be straightforward: https://tinyurl.com/cmzywyz3 However, planning will have to be alert to schemes built under so-called 'permitted development' rights, which would be exempt from the requirement to submit a biodiversity net gain plan: https://tinyurl.com/3fyhbzr8
FS-Case-311868155	Martin Dowse	option4	Allow flexibility and how it relates to each proposal?
FS-Case-312251067	Neal Jillings Place Land Ltd	option4	Clearly a one size fits all approach will be self defeating here. on or off site provision or a tariff or a combination is the only sensible way to proceed (assuming the relevant legislating is enacted)
FS-Case-312255566	Stephen sadler	option2	The wildlife and bio diversity needs to remain at, or near to where the development is. It is this diversity that improves the quality of life for ALL residents yet i development plans existing resident are ignored and they lose the diversity they used to have in their gardens etc.
FS-Case-312449388	George Williams	option5	There should be flexibility within the Plan policies to allow for on-site provision, local habitat provision, or strategic schemes. Some sites will be able to deliver

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	Greenslade Taylor Hunt		biodiversity gains within the scheme and should not therefore have to provide habitats elsewhere or contributions for strategic sites. Those sites that cannot or do not wish to provide on-site provision can have the opportunity to provide gains elsewhere. As such option 4 would allow for the biodiversity ambitions of the Council to be met without prejudicing the delivery of sustainable development sites.
FS-Case-312482944	Peter Bowler NA	option2	This is a non question. How can planning create biodiversity? It can only restrict damage to nature.
FS-Case-312655834	Theresa Sanders	option2	Legal obligations for developer must be sustainable and enduring.
FS-Case-312744056	Christina Skinner	option4	Firstly should not risk upsetting bio diversity.
FS-Case-312781179	Carine Silver	option1	Offsetting has been roundly debunked by environmental experts.
FS-Case-312834131	Robert Dunn	option4	<p>A combination of on site provision and securing local habitats would be a start. Cash tariffs must have a clear destination at the point of payment, else their value will erode - e.g. supporting the expansion or improvement of specific reserves and spaces outside the local area. It would also be important that the system isn't "gamed" and what is intended as gains in biodiversity results in a new set of comparatively uniform habitats, e.g. "green roofs" all turning out to be sedum based and so not very diverse. True diversity needs to be ensured. On site provision can be linked to Chapter 3, giving space for health and wellbeing.</p> <p>Furthermore, development should also be sympathetic to the needs of the displaced wildlife - e.g. automatically providing hedgehog highways between back gardens, ensuring that hedges are retained when designing developments, and on-site provision is not just a communal lawn!</p>
FS-Case-313155665	Catherine Dandridge	option4	The more departments work together the better the outcome is for wildlife. If a developer pays one off payment to off set destruction of habitat they have no vested interest to consider biodiversity during the build & as such destroy landscapes that cannot be replaced by paying into a compensation fund. Every vested party must be held accountable throughout development.
FS-Case-313198806	Vicki Whatley	option2	Replacing the lost groynes and making new ones should be considered. Also dredging the Exe, replacing the sand dunes properly and reducing the sand bar which is fast taking away the beaches at Dawlish and Exmouth.
FS-Case-313233811	Phil Golder	option4	It may not be popular with some but initial studies seem to show that land sparing is better for nature than land sharing, so retaining larger wilder areas rather than trying to squeeze human development in amongst ever smaller areas of natural habitat. Connecting areas of natural habitat is also key to helping diversity, especially in a time of climate change. It is also important to have some green spaces among development for human wellbeing
FS-Case-313343575	Joanna Burkey	option1	Efforts should me made that biodiversity should be achieved on the site at the time of the development. As is clear to me on a local basis, if you give developers the option to do something at a later date or provide finance for, it is very difficult to police this and it is highly like that it will never happen.
FS-Case-313468624	Caroline Dartnall	option4	Depends on the development as to which solution is required
FS-Case-313523282	Gary Barlow	option5	completely unworkable idea.
FS-Case-313584761	Richard Norman Musbury Barn	option5	I ere between 2 and 3 - a sensible mix?
FS-Case-313613307	Madeleine Blu	option5	We should not disturb the existing biodiversity. Loss of habitat is the main cause of loss of species.
FS-Case-313618009	Elizabeth Twining	option4	Option 1 seems the best but may not always be achievable
FS-Case-313629840	Cathy Gardner	option1	If on-site is impossible then option 2

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FS-Case-313643991	Douglas Smith	option4	No one plan would cover all sites so need for flexibility
FS-Case-313672954	Brian Ward	option1	For every tree removed, plant at least 2 new trees.
FS-Case-313678330	june glennie	option1	keep it simple
FS-Case-313693362	Gary Tubb	option1	Very important to protect and enhance.
FS-Case-313718525	Robert Maynard	option4	Option 4 - Biodiversity and earth science resources of East Devon's natural environment should be sustained and where possible enhanced, having regard to the current best practice on the subject.
FS-Case-313771026	John Connolly	option2	Legally binding commitments are more likely to be observed. Cash payments create no transparency between the cash and the point of expenditure.
FS-Case-313780058	Megan Lowe	option1	Option 1 or 2 preferable. Developments should only be built where they are able to improve biodiversity for example over-grazed pony paddocks or intensive agricultural land (although that may come at a cost to food growing).
FS-Case-313857211	Linda Johnson	option5	This is difficult to select a preference as each site would be best considered on its own merits. EDDC faces a massive challenge to provide housing with build costs now including CIL, S106 obligations with a potential figure of £9,000 to £15,000 for biodiversity. This could drive the cost of housing up and the number of people able to afford to buy in decline and therefore potentially putting more pressure on the provision of affordable housing. Biodiverse wildlife habitats could be better provided by other means and through other agencies which could come in place as EU grant funding is wound down and a new system of support is put in place.
FS-Case-313884230	Andrew Roberts	option2	Easy access to existing or new areas as well as incorporating a degree of green design in developments would be welcome
FS-Case-313997024	Richard Holman	option5	The EDDC is trying to blanket cover this area of need onto everyone. If it is needed on a particular site then that is how it should be dealt with individually.
FS-Case-314113114	Caroline Wilson Chardstock Parish Council	option1	The UK is near the top of the list of nations for loss of wildlife -- nothing to be proud of. Connectivity of wildlife areas to protect animal movements must be preserved and a survey undertaken to identify these before any development planning occurs.
FS-Case-314133727	Ian Jewson Walsingham Planning Ltd	option5	A range of options should be available for addressing net biodiversity gain
FS-Case-314221267	Brian Lowing	option1	This cannot be allowed to increase house prices even further by the £9K to £15K suggested. We are trying to make homes affordable!
FS-Case-314261371	David Valentine Gittisham Parish Council	option2	The protection of our natural environment is an essential component in parallel with Objectives 1 and 6. Policies should be cross referenced to provide a package of measures which should promote appropriate protection and enhancements to improve biodiversity. An area of omission is the role of farming and how land management can affect biodiversity, climate change, flooding etc.. Innovative agricultural techniques can be used and encouraged to address many different environmental, social and economic concerns.
FS-Case-314278250	Keith Bungay	option4	Options 1-4 should operate flexibly according to the circumstances of individual sites
FS-Case-314437283	Jacqui Baldwin		Mix of 1 and 2 but not Option 3
FS-Case-314536685	Andrew Butler National Farmers Union	option4	Farm businesses can be part of the solution for biodiversity net gain and there may well be a role for the local authority to help bring landowners together to ensure best possible outcomes in the district.
FS-Case-314622730	Timothy Legg	option1	Anything to preserve biodiversity and avoid the landscape becoming 'sterile'.
FS-Case-314758581	Peter Ball Kilmington Parish Council	option4	Give local councils the opportunity to apply for funding for local community schemes and provide relevant support and guidance.
FS-Case-314771914	Ian Cherry	option1	Building green spaces into any new development should be mandatory - and more than token gesture to tick a box.

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FS-Case-314782794	Nicola Daniel	option5	Large bio- diversity areas are needed. Cash tariffs would be lost as in the local mitigation scheme.
FS-Case-314894688	John Colby		No comment
FS-Case-314926201	Richard Crabtree	option1	If a site is loosing biodiversity it needs to be restored in the same location.
FS-Case-314937410	Eleonore Pang		Must be provided properly by developers.
FS-Case-315078619	David Venner	option5	A combination of Options 1 & 2. The reason for not including Option 3 is that any cash payment agreed may be too little over time, or may be diluted or used for an alternative purpose, with little or no benefit provided for its original purpose.
FS-Case-315100989	Elaine Wade	option1	Whilst I have some sympathy for option 2 I would want to know rules in how, where and what on - the money that may be spent. In other words that the outcomes are good for the local area and do not impact on other objectives.
FS-Case-315126013	George Williams Greenslade Taylor Hunt	option5	There should be flexibility within the Plan policies to allow for on-site provision, local habitat provision, or strategic schemes. Some sites will be able to deliver biodiversity gains within the scheme and should not therefore have to provide habitats elsewhere or contributions for strategic sites. Those sites that cannot or do not wish to provide on-site provision can have the opportunity to provide gains elsewhere. As such option 4 would allow for the biodiversity ambitions of the Council to be met without prejudicing the delivery of sustainable development sites.
FS-Case-315184341	Richard Pratt	option4	Each site needs to be assessed in it's own right, I don't think you can apply a blanket option for all sites. The default needs to be protect, not mitigate or compensate.
FS-Case-315216760	Elizabeth Campbell	option5	Looking at the current way builders throw up large housing developments, I am at a loss to understand how this could possibly ever increase biodiversity! This needs to take more consideration of where we build in the future with the expansion of towns and villages over greenfield sites being least favourable. Building companies should be made to look for older sites to re-use/repurpose rather than land banking large areas of mainly greenfield sites to develop. Setting additional tarriffs on new homes will just drive prices higher and make them even less accessible to local people as I imagine the builders will just pass this on directly to the purchaser.
FS-Case-315275424	Rob Phillips Broadhembury Neighbourhood Community Land Trust (BNCLT)	option4	Please refer to our comments at Q20.
FS-Case-315287680	Jennifer Hiley- Payne N/A	option4	assessment of the suitability in each case
FS-Case-315328621	Chris Burhop	option4	A combination is practical BUT On-site provision is mandatory. No more "I've killed the wildlife but I've given them some cash to mitigate it".
FS-Case-315423597	Kim Dearsly	option1	Designs to include ponds, tree planting, limited external lighting, allotments, playgrounds, picnic benches.
FS-Case-315449037	Darren Roberts East Devon District Council, Central Planning	option4	Small sites especially outside of the habitat mitigation zones may only require small gains, such as bat boxes, wildflower areas or hedgehog fences. Larger sites should both contribute financially and have on site provision. BNG will be introduced very soon which will set the standard.
FS-Case-315455012	Rachel Hughes	option5	I agree with Options 1 and 2.
FS-Case-315476876	Graham Long Upottery Parish Council	option2	Whilst option 2 seems the wise choice it can be envisaged that in some areas with a many small developments (See previous question on size of developments), aggregating biodiversity schemes together in one location could be preferable so that ideally, Option 2 and 3 should both be implemented.
FS-Case-315516791	Mary Truell None	option1	The preservation of biodiversity is so urgent and essential and must take precedence over any house building. See other answers for further detail.

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FS-Case-315539551	Gary Parsons Sport England		No comment
FS-Case-315622017	Robert Martin Clyst Honiton Parish Council	option5	There is a need for an alternative policy to have different sub-sections providing options so that all sites are enforced to deliver a net biodiversity gain. This policy needs to be more aspirational and in line with national standards (presently 10% net gain) especially with the nature of the quality of landscapes within the district including AONBs and other designations.
FS-Case-315666051	Olly Davey	option4	It would depend on the size of the development, and the constraints on providing biodiversity, but I think provision of bat and bird boxes, and hedgehog openings as well as insect hibernation bricks, etc are essential in all.
FS-Case-315672889	James Dorey Plainview Planning	option4	This ensures that strategic decisions can be made to provide net gains in biodiversity, whilst also encouraging small pockets of biodiversity net gain on development sites throughout the LPA. If a combination of the two is proposed we would suggest that any on site provision is achieved in a non onerous manor such as the provision of a seeded/meadow area, or bird/bat boxes.
FS-Case-315678300	George Williams Greenslade Taylor Hunt	option4	There should be flexibility within the Plan policies to allow for on-site provision, local habitat provision, or strategic schemes. Some sites will be able to deliver biodiversity gains within the scheme and should not therefore have to provide habitats elsewhere or contributions for strategic sites. Those sites that cannot or do not wish to provide on-site provision can have the opportunity to provide gains elsewhere. As such option 4 would allow for the biodiversity ambitions of the Council to be met without prejudicing the delivery of sustainable development sites.
FS-Case-315678845	Paul Hayward Newton Popleford and Harpford Parish Council	option4	* Cash contributions are a poor substitute for replacement and creation of actual bio-diverse habitats.
FS-Case-315681467	Jacqui Best	option4	It depends on the habitat and the site.
FS-Case-315690761	Naome Glanville	option1	I have ticked Option 1 as biodiversity can't exist in set places only - fauna and flora need 'corridors' and spaces to exist and flourish everywhere, to make biodiversity. Nature can flourish in all sorts of places, not just AONBs - this must be encouraged.
FS-Case-315697980	Terrence Blackler	option1	Developers should not be permitted to buy their way out of the protection of biodiversity on sites
FS-Case-315804855	Sophie Minter	option1	These options are so oversimplified and the fact that the Government tries to gloss over the matter by creating a 'standardised bio-diversity unit calculation' would be laughable were it not so incredibly important to the health of ourselves and the planet. This is plants, animals and insects we are talking about.... providing 'an off-site mitigation alternative' doesn't really work for them! And as for paying a cash tariff - this smacks of potential corruption opportunity straight away. There are more than enough cash exchanges in the murky waters of property developers and local planning without adding to them. Prioritise biodiversity over housing.
FS-Case-315884481	stephen moore Mr	option4	On site provision can quickly be lost with the passage of time.
FS-Case-315892586	Carolyn Bowles	option5	How can you have biodiversity improvements when your building on habitats, this is not an improvement, leave the habitats alone
FS-Case-315937332	Fiona Anderson	option4	I don't have much if any faith in developers providing bio diversity on site, it is usually a couple of lollipop trees that die after a year. Tax them and do it properly .
FS-Case-315939416	linda aucott	option2	I simply don't trust the planners to provide strategic net gains - each local area must contribute and provide and protect ecosystem services - wildlife should not be crammed in small areas remote from development - it must be more integrated.
FS-Case-315961800	David & Mrs Wendy Lewis	option4	East Devon has some internationally significant wildlife sites which by their very nature are irreplaceable. Some wildlife areas have taken thousands, perhaps millions of years to develop and establish. Surely we need to ensure that we protect them.
FS-Case-315967632	David Daniel	option5	Cash tariffs are a cop out EDDC really has to put more effort into managing bio-diversity on a large scale.

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			E.G. the three sites of "Environmental Significance": Exe Estuary, Dawlish Warren and the Pebblebed Heaths.
FS-Case-315968014	Eleanor Cozens	option1	This ensures that provision remains within the Developer's control and is not dependent on cooperation of nearby landowners. Likewise it helps spread bio-diversity investments rather than risking any tariff going towards a larger strategic scheme. Developers should be obliged to do as much of possible of this as early as possible and NEVER let off doing it on financial grounds.
FS-Case-315984133	Daphne CURRIER	option4	Linking together habitats across the whole region as wildlife corridors is vital. Any provision should begin with a thorough local survey to determine what is there already and include the impact of light and noise pollution and the disturbance caused by human activity near an area. Air quality is also an issue.
FS-Case-316012231	Terry Sweeney	option1	I would wish to see on site provision, because this will be most beneficial to occupants. Only if it is not possible should this gain be elsewhere, or if the gain would be greatly enhanced. Post covid research has shown how important greenspace and access to (and for) wildlife is for people. Gain should not be sited more than 5 minutes walk away ideally.
FS-Case-316016071	David Hayler none	option4	a combination of the above condering in numerical order of possibilty. the lower to provision of on site facility the higher the cash tariff.
FS-Case-316019373	Anthony Green	option5	Mitigation is ineffective, and strict restrictions essential to prevent biodiversity loss
FS-Case-316019433	Jennifer Morgan		How can an area of developed habitat be compensated by small pockets within the development? How can habitats be created to offset development? These are not viable. And securing habitats locally with the local landowner needs more explanation.
FS-Case-316023654	lauren allan	option4	I think every development should be assessed at planning individually, for its contribution to biodiversity. If its not possible to replant 5 trees on site for every one cut down then those will need to be planted elsewhere. There needs to be monitoring to ensure the net gain is maintained.
FS-Case-316047097	Richard Pryor	option2	As above
FS-Case-316053199	Ben Evans	option5	I cannot answer this one as it literally sickens me that we are talking about putting a cost on wildlife. Would you put a cost on the value of your neighbour. Disgusting. We are wildlife. We are part of nature. You cannot simply destroy it and rebuild it somewhere else.
FS-Case-316056741	Helene Jessop RSPB	option3	<ul style="list-style-type: none"> • The RSPB considers Options 1 and 2 are unlikely to provide successful delivery and maximisation of benefits for nature whereas Option 3 funds can secure land and habitat management in perpetuity and be targeted to deliver at scale and in accordance with nature recovery and network strategies, better meeting the principles of “more, bigger, better and joined up” sites and a functioning ecological network (Making Space for Nature, a review of England’s wildlife sites and ecological network, John Lawton, 2010). • Re 10.5, the RSPB recommends in light of the nature and climate emergency, a target of a net increase in biodiversity of at least 20% is required. • Re 10.7, the RSPB considers 25 years is a minimum period. • We recommend the Local Plan adopts the RSPB 10 principles for securing Biodiversity Net Gain (BNG) from development (see separate document), including ensuring BNG is additional to measures necessary to mitigate or compensate for harm, including biodiversity offsetting.
FS-Case-316065989	Sarah Butcher	option2	I also think that new housing should have some sort of covenant on it that they will not remove any remaining trees in or near their space. Too few trees and hedges are left near developments, and those that remain often get removed by the householders for ‘spoiling their view,’ restricting light or being unsafe (in their eyes, rather than that of a qualified arborist). I have had these quoted at me several times over the last 6 months in connection to Marley Lane, a lane that 20 years ago you walked down and couldn’t see the sky for trees: now you can hardly see any trees.
FS-Case-316127402	Eleanor Rylance	option1	You can’t tell your voles and badgers that even though their houses are being destroyed to build humans’ houses, they can rest assured that other badgers and other voles will be getting new homes. That’s not how voles and badgers work. We

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			need to accommodate them near where they already live, and protect their habitat despite wanting to build our own houses. Biodiversity gain should happen in every development. Should not be able to export this requirement to somewhere else.
FS-Case-316135438	George Williams Greensalade Taylor Hunt	option4	There should be flexibility within the Plan policies to allow for on-site provision, local habitat provision, or strategic schemes. Some sites will be able to deliver biodiversity gains within the scheme and should not therefore have to provide habitats elsewhere or contributions for strategic sites. Those sites that cannot or do not wish to provide on-site provision can have the opportunity to provide gains elsewhere. As such option 4 would allow for the biodiversity ambitions of the Council to be met without prejudicing the delivery of sustainable development sites.
FS-Case-316136353	Bill Horner Historic Environment Team, Devon County Council		Delivering offsite biodiversity gain needs to be considered as part of the development and assessed appropriately for other environmental impacts, including any negative impact on the historic environment and landscape or positive opportunities for enhancing these.
FS-Case-316153559	Jacqueline Green	option5	Mitigation ineffective in helping biodiversity.
FS-Case-316158325	Paul Hayward Personal View only	option4	One size does NOT fit all. Treat each application on a case-by-case basis
FS-Case-316159794	George Williams Greenslade Taylor Hunt	option4	There should be flexibility within the Plan policies to allow for on-site provision, local habitat provision, or strategic schemes. Some sites will be able to deliver biodiversity gains within the scheme and should not therefore have to provide habitats elsewhere or contributions for strategic sites. Those sites that cannot or do not wish to provide on-site provision can have the opportunity to provide gains elsewhere. As such option 4 would allow for the biodiversity ambitions of the Council to be met without prejudicing the delivery of sustainable development sites.
FS-Case-316181550	Deborah Griffiths Devon Archaeological Society		Biodiversity improvements should not be at the expense of the historic environment (e.g. tree planting on archaeological sites or in other inappropriate locations). Opportunities for an integrated approach to enhancing biodiversity, heritage and landscapes should be maximised.
FS-Case-316188495	George Williams Greenslade Taylor Hunt	option5	There should be flexibility within the Plan policies to allow for on-site provision, local habitat provision, or strategic schemes. Some sites will be able to deliver biodiversity gains within the scheme and should not therefore have to provide habitats elsewhere or contributions for strategic sites. Those sites that cannot or do not wish to provide on-site provision can have the opportunity to provide gains elsewhere. As such option 4 would allow for the biodiversity ambitions of the Council to be met without prejudicing the delivery of sustainable development sites.
FS-Case-316240170	George Williams Greenslade Taylor Hunt	option5	There should be flexibility within the Plan policies to allow for on-site provision, local habitat provision, or strategic schemes. Some sites will be able to deliver biodiversity gains within the scheme and should not therefore have to provide habitats elsewhere or contributions for strategic sites. Those sites that cannot or do not wish to provide on-site provision can have the opportunity to provide gains elsewhere. As such option 4 would allow for the biodiversity ambitions of the Council to be met without prejudicing the delivery of sustainable development sites.
FS-Case-316334732	K A Pearcey	option4	mix of some local small scale and some option 3 funding approach
FS-Case-323231602	Gordon Hodgson	option4	The risk of setting a cash payment is that developers will either seek to avoid it or pay as little as possible. Enforcement and checking and monitoring of measures taken to maintain biodiversity are required and need to be paid for. Better if developers are obliged to provide the measures required at their cost in the first place with something like CIL money provided for monitoring and maintenance of the measures.
FS-Case-323661989	Michael Gooch Boyer	option4	It is considered this should be determined on a case by case basis depending on the particular physical context or viability considerations.

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FS-Case-324952647	Lawrence Turner Boyer Planning	option4	Please refer to submitted representations.
FS-Case-324964822	Sarah Jackson	option4	Whilst I have chosen Option 4, Option 2 must always be the primary route followed closely by 2 and, finally, by Option 3. That Option must only ever be considered if 1 and 2 are impossible. I am not a fan of throwing cash at habitat development where there are habitats to protect already. Once habitats are destroyed, it takes a long time to establish them; similarly, ecological diversity takes a long time to develop and properly establish itself where it may not have naturally occurred in the first place. Green buffers and wildlife corridors are critical for enabling development which allows us to live alongside habitats that we should be fiercely protecting for a great many reasons. That said we should also be seeking to create new areas of biodiversity to improve the damage done historically and we must be learning from other parts of the world who have done this with great success.
FS-Case-324977684	Simon Collier Collier Planning	option4	Please refer to submitted representations.
FS-Case-324988465	Simon Collier Collier Planning	option4	No comments at this stage.
FS-Case-324999075	David Morgan Not Applicable	option1	Please refer to submitted representations.
FS-Case-325010263	Nick Freer David Lock Associates	option4	Option 4 – A combination of options should be available to meet national biodiversity obligations.
FS-Case-325022897	DLP Planning DLP Planning DLP Planning	option4	See attached letter
FS-Case-325041454	East Devon and Tiverton & Honiton CLPs	option4	· Option 3 does not meet long-term needs for wildlife on its own.
FS-Case-325053097	Ed Persse EJP Planning Ltd	option4	It is considered this should be determined on a case by case basis depending on the particular physical context or viability considerations.
FS-Case-325070883	Emma Russell	option4	A combination of 1 and 2. Green corridors linking urban spaces to open country should be the aim.
FS-Case-325077531	I.G. Cann Exmouth Civic Society	option2	Please see attached submission.
FS-Case-325085151	Matthew Kendrick Grass Roots Planning	option4	See Separate Representations Document
FS-Case-325107229	George Williams Greenslade Taylor Hunt	option4	Please refer to submitted representations.
FS-Case-325124589	Glynnis Poole LiveWest	option4	Please refer to submitted representations.
FS-Case-325131855	Michelle Dobrota-Gibbs N/A	option4	Please refer to submitted representations.
FS-Case-325156112	Peter Dobbs	option4	Please refer to submitted representations.
FS-Case-325170882	Dorothy Taylor Exmouth Mental Health St John's Court Carers' Group	option2	Please refer to submitted representations.
FS-Case-325549089	Ken Pearson Stockland Parish Council	option5	Whilst it may be difficult to establish, on-site provision will be a first step, leading through the alternatives of 1-4 above, each probably generating less biodiversity

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			than the previous one, so that each situation may need its own biodiversity calculation to be completed prior to permissions being given?
FS-Case-325752618	Stephen Morgan-Hyland Maddox Planning	option4	Please see accompanying letter.
FS-Case-325812938	Nick Matthews Savills	option4	See attached.
FS-Case-325819281	Nick Matthews Savills		See attached report.
FS-Case-325829612	Dan Yeates Savilles	option4	Please refer to submitted representation.
FS-Case-325831870	Cem Kosaner Lichfields	option4	Please see attached comments.
FS-Case-325838141	Dan Yeates Savills	option4	Please refer to submitted representations.