



**Devon**  
Wildlife Trust

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Local Plan Team  
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Dear Local Plan Team,

### **Consultation on Second Regulation 19 Publication Draft of the East Devon Local Plan 2020-2042**

Thank you for the opportunity to comment on the Second Regulation 19 Publication Draft of the East Devon Local Plan. We confine our comments to those relating to nature and environment.

Thank you for updating the Plan to reflect a number of the comments we submitted on 24 March 2025. These changes have strengthened the Local Plan and improved its overall clarity and effectiveness. However, it is disappointing to note that many of our previous comments have not been addressed in the current iteration of the Plan. As a wildlife-focused charity, the protection and enhancement of biodiversity is central to our work and expertise. The recommendations provided in our comments are evidence-based and directly aligned with biodiversity recovery, climate resilience and best practice in landscape planning. If included in the final iteration, they would substantially strengthen the Local Plan and significantly improve its ability to deliver meaningful and long-lasting environmental benefits. We therefore strongly urge the Council to give due consideration to our comments and to incorporate these recommendations into the Plan. Comments provided as part of our response to the first Regulation 19 Publication Draft are included in Appendix A.

A significant proportion of our comments relate to the absence of a requirement for enhancement, in addition to protection, of the natural environment. The National Planning Policy Framework (NPPF) provides a clear statement that planning policies and decisions should '**contribute to and enhance the natural and local environment**'. For the majority of planning applications, enhancement of biodiversity is simple and inexpensive. We strongly urge the Council to include the requirement for enhancement throughout its Local Plan. This would make a meaningful and lasting positive difference to both the people and wildlife of East Devon.

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## **Native Species**

The Local Plan currently contains only a single reference to the use of native species, relating to a hedgerow planted in association with the site allocated for development at 'Land opposite the Village Hall'. This isolated and site-specific reference does not represent a coherent or adequate approach to landscape planting, biodiversity recovery or climate resilience.

We would strongly welcome a clear policy commitment within the Local Plan to require the use of native and locally appropriate species for all landscape planting associated with new development. Wherever possible, these species should be locally sourced, from Devon and preferably East Devon, to ensure genetic suitability, improved establishment rates and long-term ecological resilience. To enable this, the Plan should also support the development of local tree nurseries and seed hubs. The Devon Nature Recovery Network (NRN) Habitat Suitability Mapping provides a high level of spatial and ecological detail and offers a robust evidence base for the creation of appropriate, site-specific species mixes.

Embedding these commitments within the Local Plan would ensure that landscape planting contributes effectively to biodiversity recovery, climate adaptation and the delivery of a genuinely sustainable and resilient development strategy.

## **Photographs**

Photos which are utilised throughout the document are an opportunity to demonstrate good practice. Relatively few pictures are utilised in the document and a number of these do not send the right message. Photographs should aim to show good integration of semi-natural habitats into developments, with a diversity of habitats included. Habitats such as woodland, wetlands and heathlands are part of the wider East Devon landscape and should be fully integrated within developments, providing space for wildlife, adding interest and place-making to developments, providing engagement and wellbeing opportunities with local communities and providing other ecosystems services. It would be good to start this process by including the right messaging within this document.

## **Strategic Policy WS09: Clyst Valley Regional Park**

*'The park helps contribute to conservation and restoration of South East Devon European protected wildlife sites meeting conservation objectives by taking pressure of them and the delivery of the Three Rivers Landscape Recovery Project at Killerton'*. There is a typo here 'of' should be replaced with 'off'.

## **Strategic Policy WS13: Employment land at Lodge Trading Estate, Broadclyst**

*'Onsite verification of the extent of the Coastal and Floodplain grazing marsh priority habitat and a design and layout which avoids this area'*. We welcome the inclusion of *'and, where possible, enhances it'*, however we would like to see reference to the requirement for sufficient buffering from development. This will be essential to ensure that this priority habitat does not degrade as a result of directly adjacent anthropogenic influences, particularly through hydrological changes and runoff.

## **Strategic Policy SD01: Exmouth and its development allocations**

### ***Proposed Allocation of Site Exmo\_20***

Devon Wildlife Trust considers the inclusion of this site for development is unacceptable and we **object** in the strongest possible terms.

We consider that the proposed allocation is unsuitable for development both due to the location of the area within the wider ecological landscape and the habitat composition of the site itself. We note that the site was originally scoped out of being allocated in the Site Selection Report (August 2024) for a number of reasons, most significantly *'there are significant local levels of biodiversity interest at the site that could be adversely affected by development. The site promoter for a*

*southern part of the site shows highway access to the south of the site coming through a length of Unconfirmed County Wildlife Site, which would clearly cause damage.'*

### **Proximity to Designated Sites**

The proposed Exmo\_20 allocation lies directly adjacent to the southern extent of a number of sites which have been designated at the highest level. Exmo\_20 lies within 10 metres of Pebblebed Heaths National Nature Reserve (NNR), East Devon Pebblebed Heaths Special Area of Conservation (SAC), East Devon Heaths Special Protection Area (SPA) and East Devon Pebblebed Heaths Site of Special Scientific Interest (SSSI). Devon Wildlife Trust Bystock Nature Reserve also lies within these designations. These sites include a strong element of public access.

The proposed allocation lies within East Devon Pebblebed Heaths SSSI Impact Risk Zone (IRZ). Development of land situated within IRZs has potential to have a harmful effect on terrestrial SSSIs and the SACs that they underpin. Natural England consider residential development of 50 units or more likely to have an impact on the East Devon Pebblebed Heaths SSSI. It is understood the proposed allocation is for up to 700 dwellings.

Natural England SSSI condition assessments have been undertaken to determine the condition of East Devon Pebblebed Heaths SSSI, with several parcels which are considered 'unfavourable recovering' and 'unfavourable declining'. Habitats are therefore clearly in a vulnerable condition, and this is likely to be significantly exacerbated by the development of Exmo\_20.

The entirety of the proposed Exmo\_20 allocation lies within a Strategic Nature Area (SNA). This area has been identified for its nationally important habitats and woodlands and diversity of species including birds, insects, mammals and amphibians. SNAs are a key part of Devon's Nature Recovery Strategy; these areas should be targeted for enhancement and it is not appropriate to consider allocation of this land at scale for development.

The proximity of the European sites (SPA and SAC) to the proposed allocation raises considerations under the requirements of the Habitats Directive 1992 for these sites to be maintained or, where necessary, restored at a favourable conservation status (Article 3 (1)). Natural England has a clear presumption against any net increase in residential development within 400m of a heathland SAC. There is a substantial evidence base which demonstrates that urban development in the area around lowland heathland has an adverse effect on the quality of heathland interest features which underlie the designation of the European sites and SSSIs. Key references can be found at:

[https://webarchive.nationalarchives.gov.uk/ukgwa/20140605111944/http://www.naturalengland.org.uk/regions/south\\_west/ourwork/heathlands/default.aspx](https://webarchive.nationalarchives.gov.uk/ukgwa/20140605111944/http://www.naturalengland.org.uk/regions/south_west/ourwork/heathlands/default.aspx)

*The current East Devon Local Plan states 'To help preserve the integrity of the East Devon Pebblebed Heaths, specifically on account of the impacts of domestic cats through bird predation, new dwellings will not be allowed on or within 400 meters of the Pebblebed Heaths.'*

*The current Second Regulation 19 Draft includes a policy which states 'To help preserve the integrity of the East Devon Pebblebed Heaths, specifically on account of these potential impacts, new dwellings and tourist accommodation or other developments that may result in unacceptable impacts will not be permitted on or within 400 metres of the Pebblebed Heaths'.*

It is beyond the scope of this letter to detail the range and diversity of sensitive habitats and species which are supported by the NNR/SAC/SPA/SSSI designations, which would be exposed to significant detrimental effects were the site to be subject to development. These include, but are not limited to:

- Disruption to the hydrology of heathland wetland through both drainage interception and enriched urban water discharges.
- Increased air pollution.
- Increased likelihood of arson/accidental fire.
- Damage to habitat and disturbance to wildlife caused by increased use of heathland for off road cycle and motorcycling.
- Increased recreational use, especially by dog walkers, leading to disturbance of ground nesting birds and habitat damage.
- Habitat change from heath to grassland through enrichment by dog faeces.
- Predation by domestic cats on reptiles and ground nesting birds.
- Presence of higher numbers of people and greater recreational use leading to more difficulties in managing the heaths effectively for their designated interests.
- Increased fly tipping of garden and other waste.

It is important to note that many of these urban effects can operate synergistically to exacerbate the adverse impacts on designated interest features.

Due to the proximity of the proposed allocation to the SAC, it is incumbent on the local planning authority to undertake an Appropriate Assessment (AA) prior to adopting the Local Plan. It is unlikely that given the scale and proximity of the proposed Exmo\_20 allocation to the SAC, that an AA could conclude that there would be no adverse effects on the integrity of the SAC, regardless of the over-arching strategic approach of the South-East Devon European Sites Mitigation Strategy (SEDESMS). Therefore, the authority would need to progress through the derogation process and seek permission from the Secretary of State demonstrating no suitable alternatives and proposing suitable compensatory measures. Devon Wildlife Trust would urge East Devon District Council to remove this allocation from the plan to avoid such impacts altogether.

#### ***Habitats/species within the Exmo\_20 allocation boundary***

The proposed allocation includes a number of areas of high ecological value. Several blocks of woodland are present, a number of which have been highlighted as Unconfirmed Wildlife Sites. These are areas which have been identified as potentially high value habitats, but for which access has not yet been obtained to allow detailed survey. These areas are identified by comprehensive assessment of aerial photography and are therefore likely to support habitat of high value for wildlife.

A number of areas within Exmo\_20 are listed in the Priority Habitat Inventory, which includes designated areas of ancient and deciduous woodland and other assigned habitats of importance.

The allocation site currently serves an important function of acting as a buffer between the urban area of Exmouth and the highly designated land to the north. Development within the proposed allocation would result in degradation and loss of ecologically supportive environments outside the designated site boundaries. For example, nightjar travel away from heaths to feed and therefore development of habitat directly adjacent to heathland has the potential to negatively impact this species associated with primary designation habitats of the European sites.

It is deeply concerning to hear that at the time of our comments dated 6 November 2024, enabling works appeared to have commenced on site, with tree felling to create access underway. We urge the LPA to ensure that such works are halted, with compensation measures undertaken to address any biodiversity loss which has occurred.

We hope that the information presented above explains why the area encompassed within proposed allocation Exmo\_20 is wholly unsuitable for development. We do not believe that it is feasible to develop this site without causing significant adverse effects on the integrity of the SAC.

We strongly urge East Devon District Council not to include this proposed allocation within its Local Plan.

**Revised text in the Second Regulation 19 Draft**

We note that the LPA has sought to address the significant concerns regarding this allocation with the provision of revised text within the Second Regulation 19 Draft. The revisions provided do not sufficiently address the points outlined above.

Notwithstanding our strong objection to the inclusion of this allocation within the Local Plan, the following comments are provided:

*'Street lighting should be avoided, and new planting should provide screening'*. As per our comments above, this should be rephrased to stipulate the requirement for native planting. Native planting is particularly important in this area due to the sensitive location of the site in proximity to European designated sites.

*'A natural buffer should be retained in the north-east of the site, along the B3179, to conserve foraging areas for nightjars opportunities for BNG and to maintain visual amenity adjacent to the East Devon National Landscape'*. The inclusion of BNG in this sentence is confusing. Rewording is required. Additionality also needs to be considered here.

*'Any car parking near to the SAC/SPA should be for uses that do not support recreational access to the SAC/SPA'*. This statement is not feasible. Any parking provision in proximity to the SAC/SPA is likely to be utilised for recreational access into the SAC/SPA, regardless of what the parking is intended for. A clear statement restricting the development of parking areas within 400m of the SAC/SPA is required.

**Policy SE02: Employment development in the countryside**

*'It is well integrated with its surroundings and closely related to existing buildings, being of appropriate location, scale, design and materials so as not to harm the character, biodiversity and landscape of the rural area particularly within the NLs'*. Whilst we welcome a statement which protects biodiversity from harm, as above this does not reflect the requirement of the NPPF. This sentence should be reworded to include the requirement to enhance biodiversity.

**Policy TR05: Aerodrome safeguarded areas and Public Safety Zones**

*'...in comparison the mean for all English district local authorities are 96.61% and 73.24% respectfully'*. There is a typo here. *'Respectfully'* should be replaced with *'respectively'*.

**Policy PB01: Protection of internationally and nationally important wildlife sites**

*'Consideration of compensation measures must be undertaken as early as possible in developing proposals and include utilisation of the Discretionary Advice Service from Natural England'*.

Natural England also offer Pre-Submission Screening to advise applicants on whether their proposals meet licensing requirements and to suggest necessary changes before formal review.

**Strategic Policy PB05: Biodiversity Net Gain (BNG)**

*'Future Habitat bank in East Devon could offer the potential to deliver substantial biodiversity units'*. There is a typo here. *'Bank'* should be replaced with *'banks'*

Yours sincerely,

Devon Wildlife Trust  
[planning@devonwildlifetrust.org](mailto:planning@devonwildlifetrust.org)

## Appendix A

### General comments

We applaud East Devon District Council for its commitment to exceed minimum national levels with regard to Biodiversity Net Gain, however we are disappointed to note that this policy has been weakened since the Draft Local Plan was published. We strongly advise the Council to reinstate the original text, ensuring delivery of substantial net gains for the biodiversity of East Devon and the associated benefits for its population.

We are extremely disappointed to note that policies 89. Policy – Ecological Impact Assessment and 90. Policy – Due consideration of protected and notable species have been removed following publication of the Draft Local Plan. Robust ecological survey is the cornerstone for delivery of the best outcome for wildlife during development. Unfortunately, we commonly review Ecological Impact Assessments that have been submitted as part of a planning application which are well below acceptable standards, resulting in significant negative impacts for biodiversity. If the Council wishes to see the delivery of an '*outstanding natural environment*' throughout East Devon, thorough assessment of the existing ecological value of a site followed by detailed measures for enhancement and compensation are required. We strongly urge East Devon District Council to reinstate these two policies.

Whilst we recognise and welcome the inclusion of reference to the environment in discrete sections within the draft Local Plan, we also urge the need for environment, nature, nature recovery and climate to be embedded throughout the plan and given the weight and level of resource needed to deliver this. Throughout the document it is apparent that policies have been written without ecological input, which is often to the detriment of the environment. It is essential that the County Ecologist, or person with similar knowledge and skills, comment on the entirety of this document to ensure that the importance of nature is woven into each and every section. This is required in order to ensure that the vision for an '*outstanding natural environment*' becomes a reality. A 'nature everywhere' approach should be reflected within every policy.

The Local Plan should include a specific strategic policy on environment. An outstanding natural environment is one of the stated objectives of the Local Plan and the omission of a strategic policy on this theme is therefore at odds with the stated aims of EDDC.

The accreditation scheme Building with Nature is given a single reference in a policy relating to Clyst Valley Regional Park. Schemes such as Building with Nature can be utilised to demonstrate best practice and should be referenced throughout the document to incentivise use.

### Para 2.10 Table I Plan Objectives

Objective 2 '*...moves the district towards delivering net-zero carbon emissions by 2040*' should be strengthened to state that net-zero carbon emissions **will** be achieved by 2040. We would also urge the council to revise their targets to 'net-zero/positive'.

Objective 3 '*To provide high quality new homes to meet people's needs*' should be reworded to state 'sustainable, high quality new homes'.

Objective 5 '*To promote the vitality of our town centres, encourage investment, greater flexibility and a wider range of activities to increase footfall and spend.*' Reference to the need for 'green' town centres should be included here.

Objective 6 '*To promote high quality beautiful development that is designed and constructed to meet 21<sup>st</sup> century needs*' should be reworded to 'sustainable, high quality'.

Objective 8 We welcome the inclusion of an objective which seeks to achieve an outstanding natural environment. However, we believe the language used for the objective should be stronger to ensure that an outstanding natural environment is delivered. '*and support an increase in biodiversity*' should be replaced with 'and deliver an increase in biodiversity'.

### **Chapter 3. The Spatial Strategy**

Policies throughout this chapter are missing reference to the environment. The benefits that nature brings to health and wellbeing are well recognised and specific targets should be included within these policies to ensure that these benefits are realised within every development. Targets should detail a minimum size of green space which should be provided, which ensures accessible nature-rich greenspace that is inviting to all who live and work in the area. Reference to the inclusion of green corridors is also required.

### **Chapter 4. Development at the West End**

#### **Strategic Policy WS01– Development of a second new community east of Exeter**

We welcome the commitment to deliver a minimum of 254 hectares of land for green infrastructure provision as part of the new town. However, a greater level of detail is required within this policy to ensure that high quality nature-rich infrastructure is delivered. We would like to see reference to the creation of local natural habitats (not just 'green space') including a wide range of semi-natural habitats and features. These bring biodiversity, carbon, water-environment and wellbeing benefits and can be integrated to help define neighbourhoods. The Nature Recovery Network should be utilised to inform the creation of green infrastructure. Buildings should also incorporate homes for wildlife, and lighting must be carefully planned to be sensitive to wildlife and provide dark areas/corridors for nocturnal wildlife.

#### **Strategic policy WS02 – Development within the Enterprise Zone**

We would welcome the inclusion of reference to the requirement for protection and enhancement of our natural environment within this section.

#### **Strategic Policy WS03: Exeter Science Park**

#### **Strategic Policy WS04: Land north of the Science Park (Brcl\_23)**

Both of these policies include the phrase '*supporting green and grey infrastructure*'. This terminology should be strengthened to state 'delivery of high quality green infrastructure'.

#### **Strategic Policy WS06: Employment land east of airport**

'*Protection of the County Wildlife Site*' should be strengthened to 'Protection and enhancement of the County Wildlife Site (in line with Environment Act 2021 requirements), including sufficient buffering from development'.

#### **Strategic Policy WS10: Development next to the M5 and north of Topsham**

'*Supporting infrastructure, green spaces...*' should be replaced with 'delivery of high quality green infrastructure'.

#### **Strategic Policy WS15: Employment land at Darts Farm**

'*If the development will affect trees or hedges along the north of the site, then further assessment of impact on the Exe Estuary SPA will be required*'. Potential impacts to the SPA from adjacent development are not limited to the removal of trees or hedgerows. This text should be replaced with 'consideration of the potential impacts of the scheme on the Exe Estuary SPA by an appropriately qualified ecologist in line with Habitats Regulations requirements'.

#### **Strategic Policy CC01: Climate emergency**

We would urge the council to revise their targets to 'net-zero/positive'.

#### **Strategic Policy CC04: Energy storage**

### **Strategic Policy CC05: Heat networks**

These policies should be reworded to include reference to the requirement for enhancement of our natural environment.

### **Strategic Policy AR01: Flooding**

*'Preference will be given to systems that reduce pollution risks and contribute to the conservation and enhancement of biodiversity and green infrastructure where practicable.'* Should be rephrased to remove 'where practicable'. This phrase is superfluous and undermines the point which is being made.

*'Where appropriate, the opportunity for Natural Flood Management in rural areas, SuDS retrofit in urban areas and river restoration should be maximised'*. Again, 'where appropriate' is superfluous and should be removed.

### **Policy AR03: Coastal Change Management Areas (CCMAs)**

#### **Policy AR05: Development affecting coastal erosion**

These policies should be reworded to include reference to the requirement for enhancement of our natural environment.

### **Strategic Policy HN01: Housing to address needs**

Reference is needed here to the requirement for enhancement of the natural environment, and for building to achieve net-zero carbon.

### **Policy HN03: Housing to meet the needs of older people**

Access to nature is important for people at all stages of their life. Reference is needed to the requirement for provision of areas where older people are able to access the natural environment.

### **Policy SE01: Employment development within settlement boundaries**

Natural context is missing from this policy. Reference should be made to the inclusion of the natural environment within employment areas in order to ensure that people are able to work in areas where they are connected with nature.

### **Policy SE03: Farm diversification**

These policies should be reworded to include reference to the requirement for protection and enhancement of our natural environment.

### **Policy SE07: Town centre development, sequential approach and impact assessment**

*'and enhance the natural environment wherever possible'*. 'wherever possible' is superfluous and should be removed as it undermines the point which is being made. It is always possible to enhance the natural environment. Even small enhancements such as hanging baskets or planters on the corners of streets can provide enhancements for nature. The provision of well designed, connected, diverse natural corridors through town centres can act as important flagship projects showcasing the benefits of the natural environment.

### **Policy SE10: Sustainable tourism**

*'Positively contribute to the natural beauty, wildlife and cultural heritage of the District'*. We welcome the inclusion of this requirement within this policy, but it is unclear why this is included here and not elsewhere within the Local Plan. This statement will result in enhancement of the natural environment, working towards the council's objective of 'an outstanding natural environment'. This type of phraseology should be included within the majority of policies.

### **Policy SE11: Holiday accommodation parks in designated landscapes**

This policy needs reference to the requirement for protection and enhancement of the natural environment.

In areas where existing nature value is high, where land forms important nature corridors/buffers and where land has high potential for nature recovery alongside other uses, then DWT would urge higher BNG expectations such as 25%.

**Strategic Policy DS01: Design and local distinctiveness**

Reference to protection of biodiversity is required as a point under '*Proposals will only be permitted where they: C. Do not adversely affect:*'. The point should read 'the existing ecological value of the site'. All development must follow the mitigation hierarchy of avoid, minimise, mitigate. It is critical to be clear at all points that the first and preferable option is to avoid damage. Only where this cannot be wholly achieved should minimising, mitigating and replacing the damage be considered. The mitigation hierarchy should be referred to within this policy.

*'Appropriate soft landscape (greening) measures and open space provision to enhance amenity and biodiversity value'*. This statement is a missed opportunity for a much greater benefit to wildlife. The text should be replaced with wording which states that the landscaping must be designed to form ecological networks throughout the built environment, which are of benefit to both nature and the establishing community of residents. Native species should be utilised and the text should state that 'development must deliver a minimum 20% biodiversity net gain'.

**Policy DS02: Housing density and efficient use of land**

Reference is required to ensuring that the existing biodiversity value of the site is retained and enhanced.

**Policy DS03: Display of advertisements**

'Designed with consideration of the existing biodiversity value of the site' should be included as an additional point.

**Strategic Policy TR01: Prioritising walking, wheeling, cycling, and public transport**

Reference should be made to designing linear transport links which consider and provide enhancements to biodiversity.

**Policy TR07: Wireless connectivity and telecoms infrastructure**

*'...avoiding harm to landscape character, heritage, environment, and biodiversity'* should be reworded to read 'protecting and enhancing biodiversity'.

**Strategic Policy OL01: Landscape features**

Fragmentation of hedgerow habitats is also an important consideration that needs to be addressed by this policy. Whilst the removal of 5m of hedgerow habitat may appear of little consequence, if removal severs a bat flightline, for example, the results of habitat removal would be the functional loss of a much larger area of habitat to bat species.

**Policy OL05: Green wedges**

**Policy OL06: Land of Local Amenity Importance and Local Green Space**

In areas where existing nature value is high, where land forms important nature corridors/buffers and where land has high potential for nature recovery alongside other uses, then DWT would urge higher BNG expectations such as 25%.

**Policy PB03: Protection of irreplaceable habitats and important features**

*'Hedgerow translocation should always be considered first, as a preferential option to hedgerow destruction followed by compensation'*. 'Robust evidence for lack of hedgerow translocation will be required' should be added to this sentence.

*'EclAs should be informed by recent survey information undertaken at suitable time of year following best practice guidelines and BS 42020:2013'*. If an acceptable standard of EclA is to be achieved, far more detail is required here as per Policy 89 of the consultation draft dated November 2022. As a minimum, the following should be included:

- The Chartered Institute of Ecology and Environmental Management (CIEEM) EclA guidelines should be referenced.
- A specified time period for recent survey information is required. For example, Teignbridge District Council require all surveys to have been completed within two and a half years of submission.
- Requirement for assessment to have been completed by a suitably qualified ecologist, preferably a member of CIEEM.
- All surveys to be complete prior to submission of an application.
- Reference to the precautionary principle.

Whilst this information is relevant within this policy, it also applies to several other policies provided within the plan. In order to reduce repetition, it is logical to have a single, stand-alone policy defining what constitutes an acceptable standard of EclA.

We would like to see a requirement for habitat replacement to be in line with the most recent DEFRA biodiversity metric in order to compensate for the time taken for these habitats to establish.

#### **Strategic Policy PB05: Biodiversity Net Gain**

As previously discussed, we are delighted to see the Council include the requirement to exceed minimum national levels with regard to biodiversity net gain. However, we are disappointed to note that the policy has been watered down since the Draft Local Plan was published. *'Where there is a demonstrable viability problem to achieve this target, it will be expected that all measures to exceed the national minimum requirements are made, and evidence for not achieving the 20% target is provided in full'*. It is considered highly unlikely that any major development would have a demonstrable viability problem with achieving a 20% net gain. The ability to purchase off-site credits/units means that delivery of BNG by financial means is always a viable option. If the cost of off-site credits/units was prohibitive to development, it is likely that the existing ecological value of the site would be too high to allow development to proceed. The inclusion of text which suggests that delivery of less than 20% BNG is an option is misleading and undermines the aspiration for high levels of nature recovery and should be removed from the Local Plan.

In areas where existing nature value is high, where land forms important nature corridors/buffers and where land has high potential for nature recovery alongside other uses, then DWT would urge higher BNG expectations such as 25%.

#### **Strategic Policy PB06: Local Nature Recovery Strategy and Nature Recovery Network**

It is disappointing to note that this policy has been substantially weakened following review of the draft Local Plan. We urge the council to reinstate the text within the policy which states that development within the NRN will not be supported. The Nature Recovery Network is central to the government's 'apex goal' of improving nature; development within this area will not advance this goal and should be heavily discouraged.

#### **Policy PB07: Ecological enhancement and biodiversity in the built environment**

We welcome the inclusion of the requirement for a minimum of one bird box per dwelling, but would like to see this extended to cover both bat and invertebrate boxes/bricks in addition to bird boxes. Interventions that support key local species (e.g. swifts, horseshoe bats) should be supported by preference rather than simplest, most generic or cheapest options.

This policy should include reference to the Building with Nature accreditation.

#### **Policy PB08: Tree, hedges and woodland on development sites**

No minimum compensation requirements are provided for either hedgerows or woodland. Given the time taken for these habitats to mature, it is important that detailed compensation requirements are provided within the local plan to ensure no net loss of habitat.

We would like to see the requirement for native species referred to here – please see General Comments above.

**Strategic Policy OS01: Access to open space and recreation facilities**

**Policy OS02: Sport, recreation and open space provision in association with development**

We would welcome the inclusion of reference to the requirement for enhancement of our natural environment within these policies.

**Policy OS03: Location of facilities for sport and recreation and open**

*'...provided that unacceptable adverse amenity or environmental impacts do not arise from development'*. This should be reworded to state the requirement to protect and enhance the existing biodiversity of the site.

**Policy OS04: New allotments and avoiding the loss of existing ones**

*'...and will avoid adverse environmental or amenity impacts.'* Comments as above.

**Policy OS05: Leisure and recreation developments in the countryside**

*'Development should not result in net adverse natural environmental impacts and ideally should generate improvements'*. Should be rephrased to remove 'ideally' and rephrased to 'should deliver biodiversity enhancements' (in line with Environment Act 2021 requirements).