

Comments

Draft Borough Local Plan December 2016 (02/12/16 to 13/01/17)

Comment by	Berkshire Local Nature Partnership (Ms Ellie Ellwood)
Comment ID	DBLP2650
Response Date	13/01/17 16:19
Consultation Point	1 Introduction (View)
Status	Submitted
Submission Type	Web
Version	0.1

If yes, what is the nature of your physical disability mental health condition or illness. (Please tick all that apply)

Do you agree with this content? (Once an option has been selected, detailed comments can be added) Other

Please make any other comments here:

Berkshire Local Nature Partnership (BLNP) arose alongside its national counterparts from the Government's 2011 Natural Environment White Paper, "The Natural Choice: Securing the value of nature". BLNP comprise of experts in a diversity of environmental fields, representing multiple sectors. These include environment, sustainability, health and wellbeing, education, agriculture, Public Authority, Government body, business and economy.

BLNP recommend the following action with regards to the Local Plan as a whole:

- 1 Commitment by RBWM to prepare a Biodiversity Action Plan;
- 2 Commitment to record up-to-date identification and mapping of biodiversity at all levels including species, habitats and ecological connectivity in order to address national policy, framework and objectives;
- 3 A clear objective for an overall net gain of biodiversity as called for by the National Planning Policy Framework Paragraph 109 and given statutory basis by Section 40 of the Natural Environment and Rural Communities Act 2006;
- 4 Actively seek opportunities to increase and improve habitats for biodiversity, and create new opportunities for ecological connectivity;
- 5 Recognise the value of nature to economy, culture, health and wellbeing in all aspects of the BLP;
- 6 Reference to Biodiversity Opportunity Areas (BOAs) in the context of biodiversity and habitat conservation whenever applicable in all local planning and policy documents. These areas are set out as those with the best opportunity to conserve and enhance biodiversity and habitats.

Comment by	Berkshire Local Nature Partnership (Ms Ellie Ellwood)
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Comment ID	DBLP2701
Response Date	13/01/17 16:43
Consultation Point	1.2 Preparation of the Borough Local Plan (View)
Status	Submitted
Submission Type	Web
Version	0.1

If yes, what is the nature of your physical disability mental health condition or illness. (Please tick all that apply)

Do you agree with this content? (Once an option has been selected, detailed comments can be added) Other

Please make any other comments here:

Ecological analysis should take place in advance of key planning decisions in order for the BLP to be in favour of sustainable development. Accurate, informed decisions regarding biodiversity, habitats and wildlife corridors should be made at the time of planning decisions therefore requiring completion of ecological analysis beforehand so that this information is readily available.

Comment by	Berkshire Local Nature Partnership (Ms Ellie Ellwood)
Comment ID	DBLP2703
Response Date	13/01/17 16:44
Consultation Point	1.3 Evidence base (View)
Status	Submitted
Submission Type	Web
Version	0.1

If yes, what is the nature of your physical disability mental health condition or illness. (Please tick all that apply)

Do you agree with this content? (Once an option has been selected, detailed comments can be added) Other

Please make any other comments here:

The NPPF states that as a local authority RBWM should work with the Local Nature Partnership where appropriate to assess existing and potential components of ecological networks.

To contribute to national biodiversity targets and retain its local quality of biodiversity RBWM should construct a Biodiversity Action Plan (BAP), with the inclusion of ecological connectivity mapping. A BAP is one means by which RBWM can identify their strategic approach to planning positively for

biodiversity, as detailed in NPPF Paragraph 114. It can also help to assure a net gain for biodiversity as outlined in NPPF Paragraph 109 and Section 40 of the NERC Act (2006).

RBWM should identify and map components of ecological networks as noted in NPPF Paragraph 117. By doing so, RBWM will have up-to-date information, thereby addressing NPPF Paragraph 113 and Paragraph 165. It enables RBWM to make policy and planning decisions, predict and monitor the impacts of developments on biodiversity accurately. Defra's "Technical Paper: the metric for biodiversity offsetting pilot in England" can provide guidance when recording and mapping biodiversity.

Reference to Biodiversity Opportunity Areas (BOAs) should be made in all instances with regards to biodiversity and habitat conservation.

Comment by	Berkshire Local Nature Partnership (Ms Ellie Ellwood)
Comment ID	DBLP2705
Response Date	13/01/17 16:44
Consultation Point	1.4 Policy context (View)
Status	Submitted
Submission Type	Web
Version	0.1

If yes, what is the nature of your physical disability mental health condition or illness. (Please tick all that apply)

Do you agree with this content? (Once an option has been selected, detailed comments can be added) Other

Please make any other comments here:

A BAP and/or Strategic Biodiversity Assessment are key to ensuring that the BLP adheres to national policy and framework for biodiversity.

The policy context should refer to the NERC Act (2006) and the Biodiversity 2020 Strategy.

Comment by	Berkshire Local Nature Partnership (Ms Ellie Ellwood)
Comment ID	DBLP2645
Response Date	13/01/17 16:17
Consultation Point	1.6 Duty to Cooperate (View)
Status	Submitted
Submission Type	Web
Version	0.1

If yes, what is the nature of your physical disability mental health condition or illness. (Please tick all that apply)

Do you agree with this content? (Once an option has been selected, detailed comments can be added) Other

Please make any other comments here:

Public Authorities have a Duty to Cooperate with Local Nature Partnerships.

Section 40 of the NERC Act (2006) outlines RBWM's Duty with regards to biodiversity. To comply, RBWM require thorough identification, mapping and analysis of the status of the Borough's biodiversity. This is best met with a comprehensive BAP including ecological mapping.

Comment by	Berkshire Local Nature Partnership (Ms Ellie Ellwood)
Comment ID	DBLP2670
Response Date	13/01/17 16:25
Consultation Point	Objective 11 Climate change and biodiversity (View)
Status	Submitted
Submission Type	Web
Version	0.1

If yes, what is the nature of your physical disability mental health condition or illness. (Please tick all that apply)

Do you agree with this content? (Once an option has been selected, detailed comments can be added) No

If you disagree, please tell us why?

The current objective does not encourage best practice. The value of nature as a factor in flood-risk reduction should be accounted for.

BLNP advocate the following alterations and additions to Objective 11:

i. Promote *and demonstrate best practice* for sustainable design and construction.

iv. Promote a net gain in biodiversity through enhancement, creation and connectivity of natural green space.

A net gain of biodiversity is referred to in NPPF Paragraph 109 and given statutory basis by Section 40 of the NERC Act 2006.

Comment by	Berkshire Local Nature Partnership (Ms Ellie Ellwood)
Comment ID	DBLP2672
Response Date	13/01/17 16:27
Consultation Point	5.10 Sustainable and community led development (View)
Status	Submitted

Submission Type Web

Version 0.1

If yes, what is the nature of your physical disability mental health condition or illness. (Please tick all that apply)

Do you agree with this content? (Once an option has been selected, detailed comments can be added) No

If you disagree, please tell us why?

Where community led development includes damage to biodiversity or the natural environment a democratic review should be held. Safeguards should be put in place to prevent any development of designated sites including SPAs, SSSIs, LWS and other designations.

Comment by Berkshire Local Nature Partnership (Ms Ellie Ellwood)

Comment ID DBLP2677

Response Date 13/01/17 16:31

Consultation Point Policy EP 1 Environmental Protection ([View](#))

Status Submitted

Submission Type Web

Version 0.1

If yes, what is the nature of your physical disability mental health condition or illness. (Please tick all that apply)

Do you agree with this content? (Once an option has been selected, detailed comments can be added) No

If you disagree, please tell us why?

The impact of a development on biodiversity can be profoundly negative. These losses could include but are not limited to the following:

- 1 Loss of land which currently has little or no human activity, in which wildlife populations can otherwise thrive without disturbance;
- 2 Permanent loss of habitat as a result of development;
- 3 Cumulative loss of habitat due to combined net impacts of development over time, which may result in further species decline and local extinction.

BLNP recommend a proactive strategy to ensure that the net impact to biodiversity remains consistently positive over time and across future developments as noted in NPPF Paragraph 109. A means for effective assessment of the cumulative impacts should be identified and implemented in addition to the individual site-specific impacts. Where sites are developed in phases, an assessment should occur at each phase. Means to record and monitor long-term biodiversity, habitat and ecosystem function should be put in place, whereby mitigation measures can be applied to address and counteract unforeseen negative impacts at biodiversity, habitat or ecosystem level.

Reference should be made to the statement made in the NPPF "Biodiversity net gains where possible" in paragraph 109.

Comment by	Berkshire Local Nature Partnership (Ms Ellie Ellwood)
Comment ID	DBLP2679
Response Date	13/01/17 16:32
Consultation Point	Policy SP 1 Spatial Strategy (View)
Status	Submitted
Submission Type	Web
Version	0.1

If yes, what is the nature of your physical disability mental health condition or illness. (Please tick all that apply)

Do you agree with this content? (Once an option has been selected, detailed comments can be added) No

If you disagree, please tell us why?

There is no clarity of the extent to which development will be directed to brownfield and urban sites. Development of Green Belt sites should only take place where absolutely necessary and no alternative is suitable.

Comment by	Berkshire Local Nature Partnership (Ms Ellie Ellwood)
Comment ID	DBLP2687
Response Date	13/01/17 16:35
Consultation Point	14.1 Context (View)
Status	Submitted
Submission Type	Web
Version	0.1

If yes, what is the nature of your physical disability mental health condition or illness. (Please tick all that apply)

Do you agree with this content? (Once an option has been selected, detailed comments can be added) No

If you disagree, please tell us why?

The benefits of nature to public health (both physical and mental) and wellbeing are not identified.

RBWM should aim to enhance existing, and create new habitats and spaces for biodiversity. This includes applying new designations and protection to natural spaces within the Borough.

Comment by	Berkshire Local Nature Partnership (Ms Ellie Ellwood)
Comment ID	DBLP2690
Response Date	13/01/17 16:37
Consultation Point	Policy NE 1 Nature Conservation (View)
Status	Submitted
Submission Type	Web
Version	0.1

If yes, what is the nature of your physical disability mental health condition or illness. (Please tick all that apply)

Do you agree with this content? (Once an option has been selected, detailed comments can be added) No

If you disagree, please tell us why?

Development proposals should account for a net gain for biodiversity, in accord with NPPF Paragraph 109. No net biodiversity loss should result from any development. Biodiversity should be conserved and enhanced at a species level in addition to habitats.

Suggested addition to clause e:

Avoid the fragmentation of existing habitats *and actively enhance their connectivity.*

Comment by	Berkshire Local Nature Partnership (Ms Ellie Ellwood)
Comment ID	DBLP2700
Response Date	13/01/17 16:43
Consultation Point	About You (View)

Status	Submitted
Submission Type	Web
Version	0.1
What is your Post Code?	RG14 5LD
Gender	
What gender are you?	Prefer not to say
Housing	
Are you?	Other
Yourself	
Which of the following options best describes yourself?	Prefer not to say
Physical disability	
Do you have any physical disability, mental health condition or illness lasting or expected to last 12 months or more?	Prefer not to say

If yes, what is the nature of your physical disability mental health condition or illness. (Please tick all that apply)

Comment by	Berkshire Local Nature Partnership (Ms Ellie Ellwood)
Comment ID	DBLP2720
Response Date	13/01/17 16:51
Consultation Point	1 Introduction (View)
Status	Submitted
Submission Type	Web
Version	0.1

If yes, what is the nature of your physical disability mental health condition or illness. (Please tick all that apply)

Do you agree with this content? (Once an option has been selected, detailed comments can be added)	Other
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Please make any other comments here:

Berkshire Local Nature Partnership (BLNP) does not presently have the resources to construct a full response to RBWM BLP at short notice. BLNP feel that its quality of response has been negatively affected by the short timescale and its request for extension being declined.