

Appendix 1

BNG Consultation Comments and Response

Consultee	Comment / response
Burton Joyce Parish Council	In favour in principle for this policy.
	<p>Response</p> <p>Support welcomed.</p>
Burton Joyce Parish Council	<p>Policy Statement lacks a clear definition and places too much emphasis on the goodwill of developers.</p> <p>Enforcement provisions also seem to be inadequate, with the lack of mandatory process, such as inspection and assessment.</p>
	<p>Response</p> <p>In light of comments made by consultees, the document is to be amended to avoid repeating national policy and legislation on BNG. It is also clarified that its purpose is to implement national policy and achieve the national target of increasing BNG through development by a minimum of 10%.</p> <p>BNG will be subject to monitoring and enforcement in a similar manner to any other development – Appendix 4 provides details.</p>
Colwick Parish Council	<p>Welcomes progress and BNG. Supportive of the BNG Mitigation Hierarchy (principle 1). Should strongly prioritise sites that are in close proximity as possible to the site where habitat is being lost.</p>
	<p>Response</p> <p>Support noted. The mitigation hierarchy is integral to the Environment Act which the Guidance is seeking to implement and the Guidance includes a section on the BNG Hierarchy.</p>
Colwick Parish Council	<p>Would like to see habitat quality and connectivity improve around tributaries and rivers in the surrounding area and contribute to climate change adaptation for Colwick by utilising nature-based solutions to flooding.</p>
	<p>Response</p> <p>Noted.</p>
Colwick Parish Council	<p>Concern that challenges to finding compensatory sites as a result of development in urbanised areas being in areas that already abundant with green space.</p>

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	<p>Response</p> <p>Noted. The Guidance seeks to implement national legislation which prioritises on site habitat protection, enhancement and creation followed by offsite compensation.</p> <p>However, for off-site compensatory BNG, the onus is on the developer to secure a suitable site. GBC is working with partners to identify a potential landbank of local sites for BNG offsetting.</p>
Colwick Parish Council	<p>Policy 6 Interim Priority Locations for offsite BNG lists existing Country Parks etc the parish Council would like to see increasing connectivity between a range of small and large habitats. Propose land immediately adjacent to the River Trent and its tributaries which they consider underutilised and consideration should be given to this area as a priority location for BNG.</p>
	<p>Response</p> <p>In light of comments made by consultees, Policy 6 has been deleted as it is accepted that under the Environment Act, the onus is on the developer to identify suitable offsetting sites. Guidance on the location of offset sites for BNG is a matter which can be considered through a future review of the Local Plan.</p> <p>The Council is working in partnership to explore the potential of a local landbank for BNG compensatory sites. This will include a call for sites so that individuals, business and organisations can put forward potential sites.</p>
Colwick Parish Council	<p>The IPPS should be regularly reviewed to ensure its effectiveness in supporting meaningful improvements to habitats.</p>
	<p>Response</p> <p>It is intended to hold an early review of the Guidance to take on board emerging good practice and the preparation of the Local Nature Recovery Strategy. In the medium longer term, it is the intention to replace the Guidance with BNG policies in adopted Local Plans.</p>
Colwick Parish Council	<p>Sufficient officer resource should be dedicated to the rigorous assessment of applications.</p>
	<p>Response</p> <p>Noted. A budget has been agreed by the Council to establish a full time ecology officer post to provide additional support.</p>

Consultee	Comment / response
Colwick Parish Council	Thorough community and stakeholder engagement is needed as part of the planning process. All decision making in relation to BNG should be transparent.
	<p>Response</p> <p>Planning applications including those qualifying for BNG will be subject to the same procedures for consultation, publicity and decision making as usual.</p>
Colwick Parish Council	Encourages GBC to go above the 10% up to 20% possibly as an incremental increase over time.
	<p>Response</p> <p>The more aspirational target for BNG of 20% is a matter for consideration in the emerging Greater Nottingham Strategic Plan which will set a local target for the Plan Area to be applied from its adoption. In the meantime, the Guidance will implement the 10% minimum net gain target set out in the Environment Act nationally.</p>
Derbyshire County Council and Derby City Council	No officer comments.
	<p>Response</p> <p>Noted.</p>
Councillor Elwood	Biodiversity Mapping - Whilst not wanting to criticise the work done with this mapping exercise it is disappointing that there are so few sites within the urban areas of Gedling that are shown on the Opportunity Maps that could be available for improved biodiversity.
	<p>Response</p> <p>Noted.</p>
Councillor Elwood	<u>Section 57</u> (page 22) - As this section states, there is a risk that such dual use could impact adversely on the Public Open Space's primary purpose – that is to provide recreational enjoyment for residents in a new development. Clearly any improved biodiversity on a development site should not be achieved at the expense of the usefulness of the Public Open Space.
	<p>Response</p> <p>Agree. The issue would be considered carefully as part of the planning application process. It is possible to provide BNG as part of open space, however, the provision of open space</p>

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	would need to comply with the Councils existing policy on Open Space provision. Conversely, significant BNG on site would need to be accompanied by a habitat monitoring and management plan in order to ensure that BNG is delivered, managed appropriately and include actions to rectify problems should they occur.
Councillor Elwood	The Interim Planning Policy Statement refers to the value of hedgerows in providing biodiversity at various sections in the document. It might perhaps be helpful to have a specific section on how hedgerows can best be protected when new developments occur as hedgerows currently have limited protection in planning law and are often under threat.
	<p>Response</p> <p>Noted. It is not felt necessary to have a specific section on hedgerows within the Guidance given its prime purpose is to implement the Environment Act and use of the statutory metric. However, BNG habitat types include hedgerows which feature in the metric and their protection / enhancement / creation as part of a Biodiversity Gain Plan must be secured and maintained for 30 years. Where BNG is secured by condition / S 106 agreements, it will also be subject to monitoring and enforcement procedures. Whilst garden land can contribute to BNG the metric output scores recognise that its future management cannot be guaranteed given the land is owned by private individuals. Consequently, garden land for the purpose of the Guidance would not be counted as “significant” on site BNG and would not be subject to conditions / S106 or monitoring.</p>
Environment Agency	Page 5 paragraph 1 - mandatory net gain date confirmed as the 12 th of February.
	<p>Response</p> <p>Agree – change document to refer to 12th February 2024.</p>
Environment Agency	<p>Page 16, paragraph 35</p> <p>It may be worth specifying that if the condition of the site immediately prior to degradation cannot be confirmed, the baseline can be taken from January 2020</p>
	<p>Response</p> <p>Agree – change document.</p>
Environment Agency	<p>Page 22, para 58</p> <p>In the fifth sentence the document states <i>“Interim Policy 5 sets out key criteria for selecting sites for off-setting within Gedling Borough.”</i></p> <p>This should be updated and refer to Interim Policy 6 instead.</p>

Consultee	Comment / response
	Response In light of the response of other consultees this policy is to be deleted.
Friends of the Hobbucks	No comments.
	Response Noted.
Gedling Conservation Trust	The IPPS is lengthy and difficult to follow and more concise publication should be produced. However, the Trust supports its objectives.
	Response Noted. The document has been edited down to remove repetition of national policy and to be more concise.
Historic England.	No specific comments on the document. Request that where opportunities arise in the natural environment for conservation and enhancement that the historic environment is also considered; through recognising heritage as a component of landscape/ seeking opportunities to better reveal/ enhance heritage assets and their setting. Through the provision of Biodiversity Net Gain there may be opportunities to conserve or enhance the significance of the historic environment, heritage assets and their settings and we would urge the Council to consider these opportunities.
	Response Noted.
Housebuilders Federation	IPPs will be in need of instant review once the final guidance is published and may be further refined once BNG is working in practice.
	Response The document has now been reviewed in light of comments made in response to the consultation and the most recent Government guidance. It is planned to have an early review of the Guidance.
Housebuilders Federation	Should not repeat or conflict with national policy and national guidance the Council should instead refer and signpost to this national guidance. This means the IPPS should be considerably shortened.
	Agree – to avoid repetition of national policy and guidance and to sign post to national policy as appropriate. Proposed changes also include editing and shortening the document.

Consultee	Comment / response
Housebuilders Federation	In addition to referring and signposting to national policy and guidance the IPPS should set out any Gedling (or Nottinghamshire) specific issues in relation to mandatory BNG.
	Response Agree.
Housebuilders Federation	The mandatory requirement is 10% BNG any reference to any other figure is confusing and inappropriate.
	Response It is clarified that the Guidance is seeking to implement the 10% minimum national target.
Housebuilders Federation	HBF suggest the following are covered: Pre-application advice Validation issues Advice on when S106 is needed and when one is not. How “significant” BNG is determined. Advice on on-site BNG. Advice on off-site BNG including reference to the LNRS. Advice on when statutory credits can be used.
	Response Changes have been made and it is considered the above matters are covered.
Housebuilders Federation	The IPPS needs to be much clearer about the mitigation hierarchy and the BNG hierarchy which prioritises on site BNG delivery.
	Response Agreed. The document has been edited to improve clarity see paragraph 41.
Housebuilders Federation	There is no need to add a contingency as this is built into the metric.
	Response Agreed this is built into the metric.
Housebuilders Federation	Welcome more guidance on validation and what information is required to be submitted for an application and for it to be valid.
	Response Noted.
Housebuilders Federation	It would be helpful for the IPPS to provide guidance on what information is required to show they have fully explored on site BNG and evidence needed to support a decision to move down the hierarchy.
	Response

Consultee	Comment / response
	The Guidance now sets out a sequential approach in relation to on-site BNG followed by offsite BNG and lastly statutory credits (Guidance Note 2) and information which may be included within the Statement on How the Biodiversity Gain Hierarchy has been applied is in the following text at paragraph 44.
Housebuilders Federation	There is no need for the management and monitoring of off site BNG to be secured through the planning application process.
	Response Agreed where this is provided by a third party on a registered BNG site. Offsite provision on the developers own land may need to be secured through a Section 106.
Housebuilders Federation	Additional advice could usefully be provided about LNRSs.
	Response Agree- more information has been included on LNRSs and local strategies and plans / strategies that may be used to identify sites of strategic significance in advance of the publication of the final LNRS.
Ministry of Defence, Defence Infrastructure Organisation, Safeguarding Department	Designated statutory safeguarded zones associated with RAF Syerston extend over the Gedling Borough Council area. These safeguarding zones are designed to preserve operational capability by ensuring that development that might result in the creation of attractant environments for large and flocking bird species hazardous to aviation are subject to consultation.
	Response Agree to include wording as advised in new paragraph 32.
National Highways (formerly Highways England)	National Highways has considered the contents on this consultation and have no comments to make.
	Response Noted.
Natural England	Paragraph 1 needs updating that mandatory BNG will be launched on 12 th February 2024.
	Response Agree to include commencement date of 12 th February 2024 in the Introduction.
Natural England	Pleased to note that the BNG statement prepared by Nottinghamshire Councils in partnership with the

Consultee	Comment / response
	Nottinghamshire Wildlife Trust and Natural England has been referenced and used to help with the preparation of the IPPS
	<p>Response</p> <p>Noted. The reference to this work is retained.</p>
Natural England	The Defra metric will become known as the Statutory Biodiversity Metric. Other references to the metric would also need to show this update.
	<p>Response</p> <p>Noted agree change to refer to the Statutory Biodiversity Metric throughout the document.</p>
Natural England	You may want to reference Natural England's Green Infrastructure Framework: Principles & Standards (2023) Green Infrastructure Home (naturalengland.org.uk) in this section. The Framework provides a valuable resource for both local authorities and developers including a mapping tool and Design Guide.
	<p>Response</p> <p>Agreed. Reference to this publication is included in the "Relevant strategies, national section".</p>
Natural England	We are pleased to note that the Nottinghamshire Local Nature Recovery Strategy has been mentioned within this paragraph and throughout the document.
	<p>Response</p> <p>Noted.</p>
Nottinghamshire County Council as Local Lead Flood Risk Authority (LLFA)	The document lists drainage and water management principles on page 29. Whilst reference to SUDS is included, a stronger emphasis on above ground SUDS could be made to ensure that wider habitat creation benefits are realised. As LLFA, a preference to above ground SUDS is given within our assessment of applications.
	<p>Response</p> <p>Noted. The section is an extract from the Nottinghamshire BNG Framework. However, new paragraph 39 is included within the Guidance reflecting the advice of the LLFA.</p>
Nottinghamshire County Council as LLFA	The document could also highlight maintenance requirements which are sensitive to the environment whilst ensuring that SUDS features perform as originally designed.
	<p>Response</p> <p>Noted. The section is an extract from the Nottinghamshire BNG Framework. However, new paragraph 39 is included within the Guidance reflecting the advice of the LLFA.</p>

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Nottinghamshire County Council as LLFA	Using words such as “consider” in the Drainage and water management section may not be appropriate. The LLFA may oppose the movement/modification of a watercourse. Therefore stating that there is a preference for soft engineering would be more appropriate.
	Response Noted. The section is an extract from the Nottinghamshire BNG Framework. However, new paragraph 39 is included within the Guidance reflecting the advice of the LLFA.
Nottinghamshire Wildlife Trust	Support principles 1 - 11
	Response Noted. As the Guidance has been amended to emphasise its purpose is to support national policy it is not necessary to repeat these principles in the redrafted document. The emerging Greater Nottingham Strategic Plan will include a policy on BNG.
Nottinghamshire Wildlife Trust	Policy 1 – reword to state: In accordance with national legislation, development proposals must demonstrate a minimum of 10% biodiversity net gain.
	Response Policy 1 is to be deleted as a response to concerns raised by consultees. However, the Guidance is clear that it is intended to support the national target of a minimum 10% BNG gain.
Nottinghamshire Wildlife Trust	Paragraph 27 - We would like to see this IPPS emphasise the aspiration for at least 20% BNG as agreed with the wording in the county Framework. Through the framework, all the LPAs clearly show they will aim for this, which is of course subject to viability caveats anyway, as explained at IPPS para 27. There is a piece of work currently underway by the Greater Nottingham Planning Partnership to gather the evidence for all the Greater Nottingham LPAs to be able to justify the 20% figure if tested at Examination in Public, so we think GBC can confidently aim for 20%, rather than 10% minimum, in its interim guidance.
	Response The Guidance has been revised to reflect the national policy on BNG which sets out a 10% minimum target for BNG. The more aspirational target is a matter for the emerging Greater Nottingham Strategic Plan which will include a BNG policy and

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	a target for BNG to be applied from its adoption and further policy detail may be provided in a future Part 2 Local Plan / supplementary planning document. In the meantime, the Guidance will implement the 10% minimum BNG target set out in the Environment Act nationally.
Nottinghamshire Wildlife Trust	Paragraph 37 - The LPA will advise when it may be appropriate to contact these other bodies". Reason: The process is still in development, so it might be that one of bodies listed may have more (or less) of a role in future.
	Response Agree, the Guidance has been changed to refer developers to the Council's pre-application advice service.
Nottinghamshire Wildlife Trust	Principle 1. Apply the Mitigation Hierarchy This principle, perhaps together with all other references to the Mitigation Hierarchy throughout the document, we think would benefit from further clarification that it is Biodiversity gain hierarchy, not the NPPF mitigation hierarchy.
	Response Agree to clarify that the BNG Mitigation Hierarchy is distinct from the NPPF mitigation hierarchy in new paragraph 41.
Nottinghamshire Wildlife Trust	Interim Policy 4: Approaches to securing BNG In relation to species, "Developers should consider the direct and indirect impact on rare and endangered species", we suggest that a reference to considering impact on protected species is also relevant here,
	Response Agree add reference to potential impact on protected species in the text box below titled Guidance Note 3: Approaches to securing BNG.
Nottinghamshire Wildlife Trust	Support Interim Policy 5
	Response In response to concerns raised by consultees Policies 5 and 6 are deleted.
Nottinghamshire Wildlife Trust	Paragraph 53 - site visits – suggest officer of the Council.
	Response Change to planning / ecological officers in new paragraph 55.
Nottinghamshire Wildlife Trust	Paragraph 56 – NWT would object to gardens being included as BNG as long-term management cannot be enforced.
	Response

Consultee	Comment / response
	<p>Agreed. The Guidance has been amended to state that gardens would not be considered as significant BNG and not subject to monitoring see new paragraph 37.</p>
Nottinghamshire Wildlife Trust	<p>Paragraph 57 – agree and await DEFRA guidance on BNG within open space.</p>
	<p>Response</p> <p>Noted.</p>
Nottinghamshire Wildlife Trust	<p>We note that Policy 5 is mainly focused on the principal that developments which impact on designated sites are avoided. However, the second part does include a criterion that it is 'desirable' to provide complimentary BNG habitat types adjacent to designated sites. We think that para 58 should signpost to Policy 6 and you could consider moving the second part of Policy 5 to Policy 6.</p>
	<p>Response</p> <p>In response to concerns raised by consultees Policies 5 and 6 are deleted. However, Guidance Note 3 “Approaches to securing BNG” includes a bullet point relating to sites abutting a designated mature conservation site encouraging developers to enhance and create habitat types for which the adjoining site has been designated.</p>
Nottinghamshire Wildlife Trust	<p>Paragraph 58 - recommend this statement is amended to clarify that it includes Local Nature Reserves (LNRs), Country Parks (CPs) and Local Wildlife Sites (LWLS. Reason: it may be assumed only Sites of Special Scientific Interest (SSSIs) are considered, of which there are very few in Gedling.</p> <p>It is also worth bearing in mind that the resource of designated sites is limited, so only a proportion of BNG delivery could ever be on such sites. We would also recommend that habitat creation should be focused on low ecological value habitat both on CPs/ LNRs but also, importantly, elsewhere in Gedling, especially on farmland.</p>
	<p>Response</p> <p>Noted. The paragraph has been deleted and reference included to working with partners to identify potential sites for BNG offsetting – Nottinghamshire BNG landbank paragraphs 56 – 59.</p>
Nottinghamshire Wildlife Trust	<p>Appendix there is 1 SSSI not mentioned.</p> <p>Plants, bird and mammals “<i>National Biodiversity Network (NTN)</i>” -this should be (NBN).</p>

Consultee	Comment / response
	<p>We think the number of observed species is down to recorder effort more than actual distribution of animals. Therefore, we query the value of including this measure and recommend it is removed.</p>
	<p>Response</p> <p>The SSSI is included in Appendix 1 in the section Designated sites.</p> <p>Appendix 1 the section - Plants Birds, mammals has been removed.</p>
Sport England	<p>Sport England would wish to ensure that the delivery of Biodiversity Net Gain does not have unintended consequences for the use of playing fields. For example, through the provision of biodiversity net gain in a location which prejudices the use of a playing field. It is noted that at least one of the priority locations for offsite BNG, Burnstump Country Park, includes a cricket pitch.</p> <p>It is suggested that the Interim Planning Policy Statement (IPPS) makes clear that provision of biodiversity net gain on playing fields is not encouraged. Where there is no choice but to provide net gain on a playing field or other sports facility, the IPPS should make it clear that any net gain needs to meet the requirements of the NPPF and our Playing Fields Policy.</p>
	<p>Response</p> <p>Agree – include reference:</p> <p>that provision of biodiversity net gain on playing fields is not encouraged paragraph 38.</p>
Strata	<p>Introduction – needs updating following confirmation that BNG is mandatory on large sites from 12th February 2024.</p>
	<p>Response</p> <p>Agree.</p>
Strata	<p>Concur with the proposed areas of guidance listed in paragraph 8.</p>
	<p>Response</p> <p>Noted.</p>
Strata	<p>Principle 3 refers to being equitable and inclusive in terms of providing BNG. States that it is important for developers to seek to achieve net gain in partnership with other stakeholders where possible and engage early on in the design of new developments. We therefore feel that a relevant consultee is</p>

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	clearly stated, within which developers can contact to engage with early on.
	<p>Response</p> <p>The Council is not in a position at present to recommend a particular consultee. The general contact details for nature organisations is provided in the Guidance within the Glossary.</p>
Strata	It would be important for the Nottinghamshire Local Nature Recovery Strategy (LNRS) to identify sites where BNG could be delivered to support developers, where BNG cannot be delivered on site.
	<p>Response</p> <p>Noted. It is understood that this is the intention.</p>
Strata	Principle 4 'Address Risks' is vague and does not comply with national policy/guidance in so far as we are aware. We do not support this approach but regardless, this section is not helpful as it does not say what contingency should be added. We feel the DEFRA metric, which has evolved significantly over the last few years, as well as the qualified ecologists which use the metric, should be accurate enough to negate the need for a contingency.
	<p>Response</p> <p>Agree the Metric does factor in contingency and the Guidance makes it clear that the statutory Metric should be used.</p> <p>The principles are reproduced from the Nottinghamshire Common Framework on Biodiversity Net Gain. As the Guidance has been amended to emphasise its purpose is to support national policy it is not necessary to repeat these principles in the redrafted document. The emerging Greater Nottingham Strategic Plan will include a policy on BNG.</p>
Strata	Principle 5 – this refers to developments creating 'additionality'. It is not clear what this means in practice.
	<p>Response</p> <p>The principles are reproduced from the Nottinghamshire Common Framework on Biodiversity Net Gain. As the Guidance has been amended to emphasise its purpose is to support national policy it is not necessary to repeat these principles in the redrafted document. The emerging Greater Nottingham Strategic Plan will include a policy on BNG.</p>
Strata	Principle 7 – 'Be Additional'. This feels like a repetition of Principle 5 but yet it is not clear what this looks like in practice.
	Response

Consultee	Comment / response
	The principles are reproduced from the Nottinghamshire Common Framework on Biodiversity Net Gain. As the Guidance has been amended to emphasise its purpose is to support national policy it is not necessary to repeat these principles in the redrafted document. The emerging Greater Nottingham Strategic Plan will include a policy on BNG.
Strata	Principle 8 – ‘Create a Net Gain Legacy’. Again, it is not clear what this means and the 30 year management of BNG imposed by legislation already ensures this.
	<p>Response</p> <p>The principles are reproduced from the Nottinghamshire Common Framework on Biodiversity Net Gain. As the Guidance has been amended to emphasise its purpose is to support national policy it is not necessary to repeat these principles in the redrafted document. The emerging Greater Nottingham Strategic Plan will include a policy on BNG.</p>
Strata	Paragraph 35 - ‘there may be some cases where adjacent or nearby habitats such as LWS could be impacted upon both directly and indirectly and these will need to be included in the survey’. This does not comply with the legislation. The impact on nearby/adjacent wildlife sites should be assessed as part of an ecological survey and ecological impact assessment, and not included in the BNG survey as this will artificially inflate the baseline of the site.
	<p>Response</p> <p>Agreed delete reference to adjacent habitats and refer to within the red line see paragraph 30.</p>
Strata	Overall, the SPD is lengthy and should be simplified.
	<p>Response</p> <p>The IPPS is to be changed to Guidance and will be subject to editing and shortening.</p>
Taylor Wimpey and Rockspring Barwood Gamston	The IPPS is not soundly based and not necessary to progress interim policy at this time. Should focus on continuing to engage with GNP councils to produce the new strategic plan and prepare a programme and timeline for part 2 local plan.
	<p>Response</p> <p>GBC attaches high priority to progressing the Greater Nottingham Strategic Plan with its partners. This strategic plan will include a BNG policy and a target for BNG to be applied from its adoption and further policy detail may be provided in a future Part 2 Local Plan / supplementary planning document.</p>

Consultee	Comment / response
Taylor Wimpey and Rocksring Barwood Gamston	Questions whether there is a need for the IPPS given national legislation and guidance.
	<p>Response</p> <p>The Guidance has been edited to avoid unnecessary repetition of national policy and to clarify its purpose is to support national policy and add local detail.</p>
Taylor Wimpey and Rocksring Barwood Gamston	Cannot support local plan policies which predate mandatory BNG. There are significant conflicts between ACS Policy 17 and LPD 18 and the approach in the IPPS.
	<p>Response</p> <p>The Guidance has been edited to avoid unnecessary repetition of national policy and to clarify its purpose is to support national policy and add local detail.</p>
Taylor Wimpey and Rocksring Barwood Gamston	Strongly raise concerns regarding the soundness of introducing interim policy that would not be tested at examination. It is not referred to in the LDS or SCI and cannot replace for example ACS Policy 17 and LPD Policy 18.
	The document has been changed and edited to clarify it is guidance with its purpose being to support national policy.
Taylor Wimpey and Rocksring Barwood Gamston	Acknowledge that relevant authorities in the GNP are looking to set a higher target than the 10% and 20% is mentioned in the consultation document but this is a matter for the GNSP.
	<p>Response</p> <p>Agreed.</p>
Taylor Wimpey and Rocksring Barwood Gamston	Interim Policies 1 – 6 cannot set new development plan policy and use of the term planning policy and interim policy can give rise to confusion. It is not necessary to repeat national legislation. There is uncertainty over the purpose and status of the interim policy.
	<p>Response</p> <p>The Guidance has been edited to avoid unnecessary repetition of national policy and to clarify its purpose is Guidance to support national policy and add local detail.</p>
Turley on Behalf of Bellway Homes,	Repeating national requirements at a local level is considered unnecessary. Would anticipate this is a matter for the new GNSP. The IPPS is not needed.

Consultee	Comment / response
Persimmon and Northern Trust	
	<p>Response</p> <p>The document has been changed and edited to avoid repeating national policy and to clarify it is guidance with its purpose being to support national policy.</p>
Turley on Behalf of Bellway Homes, Persimmon and Northern Trust	<p>Paragraph 27 “LPAs will endeavour to pursue a higher target to seeking 20% BNG but may need to consider some local factors informed by evidence and viability”.</p> <p>Seeking to double the contributions required by the Environment Act (2021) will have a significant impact on the viability and deliverability of development across Greater Nottingham and cannot be justified without a robust evidence base to assess the implications of such a requirement and to ensure compliance with CIL legislation in terms of being reasonable and proportionate when a financial contribution is sought. Table 8 of the User Guide for the BNG Statutory Metric identifies “spatial risk multipliers”, which show that a lower score is assigned for sites for BNG located further from a proposed development site, penalising development and requiring more BNG to be provided. This point would threaten cross boundary delivery of BNG and deliverability of development. Overall, therefore, it is considered that this should be deleted from the interim policy.</p>
	<p>The Guidance makes it clear its purpose is to seek a minimum of 10% BNG.</p> <p>The Greater Nottingham Strategic Plan now in preparation will include a BNG policy and a target for BNG to be applied from its adoption and further policy detail may be provided in a future Part 2 Local Plan / supplementary planning document.</p>
Turley on Behalf of Bellway Homes, Persimmon and Northern Trust	<p>On the basis of the initial technical work undertaken in support of the Land at Oxtan Road, Calverton, there are no constraints to the development of the site which could not be mitigated and managed. The illustrative framework plan submitted with representations made to the GNSP Preferred Approach consultation in February 2023 establishes that the site is capable of accommodating circa 650 dwellings and up to 9.5 hectares of Public Open Space (POS). Increasing minimum requirements could threaten the delivery of strategic sites such as Oxtan Road, which has previously been removed from the Green Belt and safeguarded for future growth by the adopted Gedling Local Plan Part 2 and made Calverton Neighbourhood Plan.</p>
	Response

Consultee	Comment / response
	The Guidance makes it clear its purpose is to seek a minimum of 10% BNG.
Turley on Behalf of Bellway Homes, Persimmon and Northern Trust	Policy 6 sets out several criteria for locating offsite BNG including locating BNG in the “best location to maximise BNG”. This is considered to be a very vague requirement and would lead to uncertainty for the applicant/decision maker.
	Response Policy 6 has been deleted.
Woodland Trust	The Borough’s tree canopy cover is 15 per cent, which contrasts to an average of 38 per cent across the EU. Therefore, we believe that woodland creation should be a major priority for the BNG IPPS.
	Response Noted. However, this is more of a strategic matter for the emerging Local Nature Recovery Strategy process to consider. The type of BNG will be determined through the use of the statutory metric and adherence to the trading rules contained within the metric although enhanced tree planting is likely to feature.
Woodland Trust	The maximum possible proportion of new trees should be native, and UK and Ireland Sourced and Grown (UKISG).
	Response Agree as a matter of principle that use should be made of native species wherever possible. This point is set out in the supporting text to Local Planning Document Policy 18: protecting and Enhancing Biodiversity at paragraph 7.2.19 of this document which states that wherever possible measures to deliver biodiversity enhancement should be incorporated into development including: <ul style="list-style-type: none"> • the use of native species of trees and shrubs and wildflower seed in landscaping proposals
Woodland Trust	In particular, irreplaceable habitats, including ancient and veteran trees, must be protected from loss and damage.
	Response It is stressed that BNG does not change existing protection for irreplaceable habitats including ancient and veteran trees.
Woodland Trust	Give weight to the relevant LNRS, as it is refined, which should identify ancient woodland sites. The LNRS should give strong weight for development site allocation. Once a site has

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	<p>been allocated it is more likely to get planning permission so it is important to embed ecological criteria in the plan. LNRSs should be used to inform priority locations for the provision of green infrastructure.</p>
	<p>Response</p> <p>The document refers to the Local Nature Recovery Strategy and affords it relevant status. This LNRS is now in preparation led by Nottinghamshire County Council, The Guidance states that when available the LNRS will inform a future review of the IPPS.</p> <p>For clarification the Greater Nottingham Strategic Plan and future Part 2 Local Plan allocate sites. Ecological criteria is used as part of the site selection progress.</p>
Woodland Trust	<p>For veteran trees, the BNG IPPS should encourage them to be recorded on the Ancient Tree Inventory and to consider locations where it might be suitable to place a Tree Preservation Order on any ancient, veteran or notable trees</p>
	<p>Response</p> <p>The IPPS is not a site-specific document and Tree Preservation Orders are dealt with through a separate process.</p>
Woodland Trust	<p>For non-ancient and veteran trees, adopt the Bristol Tree Replacement Standard¹ with respect to felling.</p>
	<p>Response</p> <p>This is a detailed matter for the Development Management process.</p>
Woodland Trust	<p>The BNG IPPS should require development projects to deliver 20 per cent BNG.</p>
	<p>Response</p> <p>The more aspirational target for BNG of 20% is a matter for consideration in the emerging Greater Nottingham Strategic Plan which will set a local target for the Plan Area to be applied from its adoption.</p>
Woodland Trust	<p>The BNG IPPS should require BNG units to be maintained for a minimum of 50 years, not just the 30 set out in the Environment Act.</p>

¹ <https://bristoltreeforum.files.wordpress.com/2020/03/bristol-tree-replacement-standard-btrs.pdf>

Consultee	Comment / response
	<p>Response</p> <p>The Guidance seeks to implement the Environment Act and it cannot therefore go beyond the 30-year timeframe specified in the Act.</p>
Woodland Trust	<p>The BNG IPPS should set standards for high quality green infrastructure including accessibility standards such as no one being more than 300 m from the nearest green space and Woodland Trust Access to Woodland standard which aspires that everyone should have access to a small wood of at least 2 ha. within 500 m of home.</p>
	<p>Response</p> <p>It is not appropriate, for the Guidance to set standards for Green Infrastructure as this would be beyond its remit. However, the Greater Nottingham Strategic Plan now in preparation will set out Blue and Green Infrastructure priorities. This new strategic plan is informed by the Greater Nottingham Blue and Green Infrastructure Strategy (2021) which forms part of its evidence base. This evidence is based on an audit of blue and green infrastructure, needs and opportunities including consideration of evidence on the accessibility to green infrastructure. The new strategy will support a strategic network of blue and green infrastructure for protection, enhancement and new habitat creation.</p>
Woodland Trust	<p>A strong tree retention standard requiring a tree survey during initial site investigations.</p>
Woodland Trust	<p>Response</p> <p>This is more a matter for the development management process which require tree surveys to be undertaken where appropriate.</p>