

### **Details of changes made to policy H14**

When the Regulation 14 consultation started on 7<sup>th</sup> March 2020, policy H14 referred to the “identified woodland corridors and stepping stones”. At that time no maps of the woodland corridors and stepping stones were available but an Opportunity to identify and map them, by leveraging from the data in the Haslemere Neighbourhood Plan Area Biodiversity Report, prepared by Surrey Wildlife Trust, was included in the Neighbourhood Plan. Maps from the Biodiversity Report were included in the Regulation 14 policy H14 and these maps identified the Statutory Designated Wildlife sites, Special Protection Area, Sites of Nature Conservation Importance, Ancient Woodland Inventory and Biodiversity Opportunity Areas.

In April 2020 the Haslemere Vision Biodiversity Team commenced work on this mapping Opportunity using grant funding from several local organisations.<sup>1</sup> Two ecologists were employed to develop the wildlife corridor maps. They completed their work in November and since the Covid 19 pandemic caused the lengthening of the Regulation 14 consultation until 31<sup>st</sup> May 2020, the maps were available for incorporation into the redrafted Neighbourhood Plan.

The consultation survey indicated strong support for policy H14 with over 75% of respondents supporting the policy fully.<sup>2</sup>

The National Trust expressed support “for the intent of the policy to preserve and extend ecological networks and green infrastructure throughout the Neighbourhood Plan area including the Trust’s land at Devil’s Punchbowl and Bramshott and Ludshott Commons to assist with the migration of flora and fauna between not only designated sites but those of more local value and thereby increase local natural capital and ensure the NPPF’s requirement of biodiversity enhancement is achieved.”

Surrey Hills AONB Board stated:

“This policy is supported and together with Policy H11 - *Habitat protection* could be reviewed to incorporate fast moving and evolving recognition to climate change, nature recovery, environmental net gain and on and off site biodiversity net gain. There is scope with the substantial uplift in land values arising from the development of greenfield sites to require at the outset developer contributions to environmental net gain over and above CIL and affordable housing measures.”

Surrey Wildlife Trust and Nature Partnership stated that the policy was “wholly welcomed”.

The Haslemere Society provided a grant to fund the wildlife corridor mapping work and responded to the consultation as follows:

“Haslemere Society understands that H14 is intended as a ‘placeholder’ for a more detailed policy to be formulated once the biodiversity mapping work listed in the full NP document as Opportunity 18. This policy needs to be more clearly linked to that work.

- In particular, the policy needs to state clearly and unequivocally what source should be used to identify wildlife corridors and stepping-stones that are covered by the policy. The Haslemere Society understands that the intent is that Haslemere Town Council will formally adopt a map of these sites and that this may be updated and amended at various points in the future. The Haslemere Society would support this process.”

Waverley Borough Council responded stating “If you haven’t done so already please liaise with Natural England over this policy. In our view the policy seeks to duplicate Policy NE1 of LPP1 and you may want to think about whether a separate NP policy is needed. It is also suggested that it needs to be clearer as to how these ‘wildlife corridors’ and ‘stepping stones’ are going to be identified?”

Consultation comments from respondents to the online survey can be found at Appendix 11b. Many related to strengthening the policy and identifying the corridors and stepping stones that the policy sought to protect.

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<sup>1</sup> Grants from Lobs Charity, CPRE Surrey, the Haslemere Society and Haslemere Town Council.

<sup>2</sup> Consultation survey results - fully Support - Policy H14.1 – 81.57%, Policy H14.2 – 75.70%, Policy H14.3 – 80.37%

Based on the consultation responses and the availability of the ecologists' report "Biodiversity Audit of Haslemere's Ecological Network" the Neighbourhood Plan working party decided to enhance policy H14 and include the maps of the Ecological Network. In addition, it was decided to quantify the amount of biodiversity net gain that should be sought on development sites. The forthcoming Environment Bill proposes a biodiversity net gain of at least 10% however because biodiversity loss in Surrey, as evidenced by the State of Surrey's Nature reports (2016 and 2017), is higher than the national average<sup>3</sup> and the fact that our natural capital plays a fundamental role in the economic prosperity of our area and the health and well-being of our residents<sup>4</sup>, a rate of at least 20% has been used. This is the same as the rate currently proposed by Guildford Borough Council in its emerging LPP2 and The Surrey Nature Partnership has formally recommended Surrey's 11 Local Planning Authorities adopt a policy for Biodiversity Net Gain requiring developers to demonstrate the post-development achievement of a minimum 20% increase in biodiversity units in support of their planning applications.<sup>5</sup> Other planning authorities such as Lichfield and Oxford are also requiring a biodiversity net gain of 20%

In order to validate these changes, the Neighbourhood Plan working party met with Surrey Wildlife Trust and Natural England to discuss the new maps of the Ecological Network and the Biodiversity Net Gain metric. Both organisations expressed support for the revised policy.

#### **Details of non-material amendments made after 30th November 2020**

At the Full Council meeting on 30<sup>th</sup> November 2020, it was agreed that Policy H14.3, and the associated intent and reasoned justification wording, be amended to show a 20% net gain for biodiversity, plus any other typographical errors or non-material changes be made by the Neighbourhood Plan Working Party prior to Regulation 15 submission to Waverley Borough Council.

The following typographical errors/non-material changes have been made:

1. Front cover - 1st paragraph amended to read - "This is a copy of our very first Neighbourhood Plan; re-drafted in response to community feedback from the local level Regulation 14 Consultation and now presented for its Regulation 16 Consultation at Borough level."
2. Contents page - H14 correction of the word "though" to "through"
3. Changed "Hindhead and Beacon Hill" to "Beacon Hill and Hindhead" on p.7, p.16, p.20 Fig 1c, p.35, p.40, p.44 Fig 6d, p.55, p.64
4. Haslemere Today - Location and role. 2<sup>nd</sup> paragraph change "and so on" to "and other neighbouring communities in the three counties."
5. Haslemere Today - Population and Demographics. Add new sentence "There are just over 7000 households in the Plan area, with a population of 16,826 (at the last census)."

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<sup>3</sup> Local extinction of an estimated 11.5% (or around 1 in 9 species) native to the country since 1985 with a further 4.4% threatened with local extinction. This compares to a national extinction rate in 2016 of 2% extinct and 13% threatened. The latest national State of Nature 2019 report shows a worsening situation. State of Nature report (2019)

<sup>4</sup> Surrey Nature Partnership (2018): Natural Capital Investment Plan for Surrey

<sup>5</sup> Surrey Nature Partnership (2020): Recommendation for adoption of 20% minimum biodiversity net gain across Surrey's planning sector: A Surrey Nature Partnership Position Statement

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6. Haslemere Today – Schools. Add final sentence ““There are several private primary and secondary schools which serve local families”
7. Principles – Context. 3<sup>rd</sup> paragraph 1<sup>st</sup> sentence remove “during the Plan period” and add “,whilst also protecting the high quality natural environment.” At end of paragraph add “Evidence from the Regulation 14 Consultation clearly demonstrated the importance to residents of ensuring inappropriate development on greenfield land does not occur.”
8. H1.2 – change “Greenbelt” to “Green belt”
9. H2 Context and Reasoned Justification. 1<sup>st</sup> paragraph correct spelling of “prioritise”.
10. H3 remove “;” after quality
11. H5 context and reasoned justification – 4th Paragraph remove It states that the average house is 13.9 times the average local salary of £32,248 . Footnote 25 remove “page 6”
12. H9.3 remove “Building for Life standards no 7 ‘Creating well defined streets and spaces’ and no 9 ‘Streets for all’” and insert “ Building for a Healthy Life standards: Walking, cycling & public transport, Well defined streets & places, Healthy Streets and Cycle & Car parking”
13. H14 Context and Reasoned Justification - second line – correct spelling of “fragmenting” and at second paragraph, 4th line, inserted a hyphen in “off-setting”. New final sentence “It is expected that a buffer will also be retained around the other components of the green network particularly those listed in the policy.”
14. H14 Context and Reasoned Justification. 4th paragraph insert “emerging” before “Environment Bill 2019-2021” insert “will” before “include”. Add final sentence “In this area, we want to go beyond this. This is because the metric used to measure net gain is not infallible (Defra have stated that a 10% increase is the lowest level of net gain they are confident at which no net loss would be achieved<sup>35</sup>) and given the scale of the ecological crisis and the pressures that wildlife face in Surrey, this policy requires new development to deliver a net gain of at least 20%.”. New Footnote no.35 added so all footnotes thereafter renumbered by one.
15. H14 Context and Reasoned Justification. Last paragraph add a final sentence - "It is expected that a buffer will also be retained around the other components of the green network particularly those listed in the policy."
16. H14 Intent. Change 10% to 20%
17. H14 Title correct “though” to “through”
18. H14.1 insert “)” in first line after “8b”
19. H14.3 – change 10% to 20%
20. H14 Wildlife corridor map (Fig 9) replaced with one with the correct settlement boundaries (boundaries as per Policy H1).
21. H18 footnote 41 correct to read “Haslemere Vision Phase 1 Consultation B2”
22. Evidence List. Date of the Biodiversity Audit of Haslemere’s Ecological Network report changed to 9 December 2020. Change “Local Green Spaces Assessment Paper” to “ Local Green Spaces and Green Finger Topic Paper”

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23. Appendix 3 - Wildlife corridor maps 1-9 all replaced with new versions showing the correct settlement boundaries (boundaries as per policy H1) .
24. Glossary - Shortened HRA description to avoid repetition of text.
25. Glossary – definition of “Hedgerows” added.
26. Glossary page 73 amended header to say “Glossary R-S”
27. Evidence List page 77 – change date of “Haslemere Traffic Flows Summary Report” to 2019