

Examination of Wyre Forest District Local Plan 2016-2036

Matter 10: Design; conservation and enhancement of the natural and historic environments; green infrastructure and provision for community facilities, open spaces and recreation; water management (Sections 9, 11, 14, 15, 20 and 27 of the Plan)

Hearing statement on behalf of Worcestershire Wildlife Trust (Mr Steven Bloomfield) (ID: 231691)

in relation to:

Question 10.2 Are the policies on conservation and enhancement of the natural and historic environments clearly expressed, consistent with national planning policy and deliverable?

Question 10.3 (i) Are the requirements laid down by Policy 14 justified, effective and consistent with national planning policy?

Question 10.2 Are the policies on conservation and enhancement of the natural and historic environments clearly expressed, consistent with national planning policy and deliverable?

1. As set out in our previous consultation responses we welcome the policy requirements set out in Policy 11D and consider that they are necessary and consistent with national policy.
2. In particular, we are pleased to support the requirement for development to seek biodiversity net gain (in part 1). While this is already explicit in the NPPF the wider context for such requirements also continues to strengthen. The Environment Bill (2019-21), for example, now includes proposals for 10% mandatory Biodiversity Net Gain for development. The Bill recently passed its second reading in the House of Commons and the new legislation is likely to be enacted by 2023, well within the lifetime of the plan.
3. Mandatory biodiversity net gain will require a demonstrable increase in biodiversity compared to the pre-development baseline. That makes it especially important for plan policy to require an appropriate level of ecological information prior to determination (as set out in part 2) and to set out expectations for long-term management and monitoring (as in part 4). Without such policy it will be impossible to secure and demonstrate net-gain as anticipated by the NPPF and likely legal considerations.

Question 10.3 (i) Are the requirements laid down by Policy 14 justified, effective and consistent with national planning policy?

4. As set out in our previous consultation responses we welcome the policy requirements set out in Policy 14 and consider that they are justified and consistent with national policy.
5. The policy may be made more effective by including a requirement regarding the need to benchmark Green Infrastructure (GI) proposals on larger applications, and especially the strategic allocations. This would help to provide clarity around what constitutes 'good' GI and what separates this from simple green spaces. There are a number of definitions of GI

(including the one in the District's own Green Infrastructure Strategy) but these do not necessarily set out what 'good' GI looks like and how GI should be integrated into development to provide the maximum benefit. Accordingly, it would be helpful for the policy (or associated reasoned justification, perhaps at paragraph 14.7) to refer to one of the benchmarking schemes that are available. In this way the council would be able to determine whether GI proposals put forward in applications for major development were of sufficient standard to deliver meaningful benefits. Noting that there are several options available, the Trust endorses Building with Nature <https://www.buildingwithnature.org.uk/> as an appropriate tool.

6. Should the council and Inspector be minded to agree with this approach we recommend wording along the lines of *'Where appropriate, developments will be required to demonstrate compliance with the standards set out in 'Building with Nature' guidance or other equivalent emerging national standards and maintain this standard throughout the lifetime of the development'*.

Steven Bloomfield – on behalf of Worcestershire Wildlife Trust
December 2020