

Site Allocations DPD

MSDC-16: Response to Action Point 19
(Prepared by Mid Sussex District Council and
agreed by Sussex Wildlife Trust)

Matter 7.2: Monitoring

12th July 2021

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1.0 Introduction

- 1.1 This note has been prepared in response to the discussion on monitoring indicators at the Matter 7 Hearing session on the 16th June 2021, at the request of the Inspector [ID-05]. This note responds to Action Point 19 which requested:

MSDC and Sussex Wildlife Trust to consider whether the monitoring indicators could include a new indicator regarding biodiversity net gain.

- 1.2 Policy SA GEN and the individual site allocation policies include a requirement for the site allocation policies to secure a net gain in biodiversity.
- 1.3 In its Hearing Statement, the Sussex Wildlife Trust [REP-748-001] highlighted that monitoring is important to demonstrate if the site allocations have achieved biodiversity net gain and if these policies have been successful in relation to biodiversity.
- 1.4 In its Regulation 19 representation, Natural England [Representation ID number 710] recommended that biodiversity net gain should be monitored. Natural England suggested the inclusion of monitoring indicators to demonstrate the amount and type of gain provided through development.
- 1.5 Paragraphs 174 and 175 of the National Planning Policy Framework (NPPF) also require biodiversity net gain to be measurable.

2.0 MSDC Response

- 2.1 The Council has previously provided a response to the monitoring of biodiversity net gain in its Hearing Statement for Matter 7 [MSDC-02g]. It remains the case that the Council intends to develop a monitoring framework for biodiversity net gain once there is certainty over the requirements for mandatory biodiversity net gain and how it will be implemented. The Council considers that the best place to detail the monitoring for biodiversity net gain will be through the District Plan Review once there is certainty over the requirements emerging from the Environment Bill. There are also other mechanisms to report progress and delivery such as the Authority Monitoring Report. However, the Council recognises that there is a proposed requirement in Policy SA GEN for the site allocation policies to secure a net gain in biodiversity and it has no objection to monitoring the biodiversity net gain of the site allocations.
- 2.2 The Council has developed a framework for monitoring the biodiversity net gain of the site allocations in discussion with the Sussex Wildlife Trust. It should be noted that this is an interim monitoring framework for the Sites DPD in advance of a potentially more detailed monitoring framework that will be developed once the Environment Bill receives Royal Assent and proposals for mandatory biodiversity net gain progress. As part of its ongoing work on biodiversity net gain and nature

recovery, the Council would welcome further engagement with Natural England and other stakeholders such as the Sussex Wildlife Trust and the Sussex Nature Partnership during the development of an approach to biodiversity net gain.

- 2.3 The Council proposes to include three indicators for monitoring biodiversity net gain delivered through the site allocations. This takes into account the suggestions made by Natural England in its Regulation 19 representation. The Sussex Wildlife Trust is also happy with this proposed monitoring framework.
- 2.4 Whilst three indicators are proposed to be included within the monitoring framework for the Sites DPD, it is intended that additional records will be kept of information relating to biodiversity net gain. This information will provide a useful evidence base to inform the development of a future strategy for biodiversity net gain and the refinement of any future monitoring framework for biodiversity net gain. This information could be contained within the biodiversity gain plans to be provided as part of a planning application and information may also follow once biodiversity net gain has been delivered.
- 2.5 Figure 1 identifies some of the additional information that the Council intends to record if it is available but will not form part of the more formal monitoring framework for biodiversity net gain delivered through the site allocations included in the Site Allocations DPD. This information may form part of a future monitoring strategy for biodiversity net gain.

- Biodiversity Metric used for calculating biodiversity net gain
- Application of the mitigation hierarchy (avoid, mitigation, compensate) (paragraph 175 a) of the NPPF)
- Details relating to off-site biodiversity net gain measures, such as landowner, site area, habitat type, management arrangements
- Details relating to any financial contributions secured
- How the secured biodiversity net gain may link to other related work, such as green infrastructure, nature recovery, Priority Habitats, protected species, landscape-led development
- Arrangements for long-term monitoring of the biodiversity net gain

Figure 1 - Additional information that could be monitored relating to biodiversity net gain

- 2.6 The Council would be happy for the Inspector to recommend that the following wording should be a proposed modification to Appendix B: Monitoring Framework of the Site Allocations DPD (Figure 2).

Policy	District Plan Objective	Indicator	Target	Implementation	Source
SA GEN: General Principles for Site Allocations To include: SA2-SA28: Employment Site Allocations SA9: Science and Technology Park SA12-SA33: Housing Site Allocations	1, 3, 5	Percentage biodiversity net gain secured as demonstrated by the Biodiversity Metric	Maximise, but a minimum 10% biodiversity net gain	Developers	MSDC Monitoring Biodiversity Gain Plan
		Number and type of biodiversity units lost or gained	Maximise the biodiversity units gained		
		Location of secured biodiversity net gain (on-site or off-site)	Secure relevant and meaningful biodiversity net gain linked to wider nature recovery		

Figure 2 - Proposed monitoring framework for biodiversity net gain