

## **Necton Neighbourhood Plan (Regulation 16)**

We welcome objectives 3 and 4 in the Neighbourhood Plan to ‘...minimise the impact of development on the natural environment’ and to ‘maximise opportunities to improve natural habitats and biodiversity.’

### **Community Aspirations 1 , 2 and 3**

We fully support the community aspirations 1, 2 and 3. These initiatives will provide important benefits for wildlife and provide ecological corridors between habitats. In addition to supporting wildlife, tree planting will be particularly beneficial with regards to climate change.

### **Policy NTN3 Local Green Spaces**

We fully support Policy NTN3 and the designation of the 8 Local Green Spaces.

### **Policy NTN8 – Flooding and Sustainable Drainage**

We support policy NTN8 regarding the use of SuDS.

### **Policy NTN5 Development Design**

We particularly support NTN5 but feel this should go further to provide more protection for the natural environment. We would support the following policy text:

- ‘Development proposals should demonstrate that due care has been taken to ensure that any associated pollution from greenhouse gases, dust, noise, litter, vibration, light, odour, waste, chemical or other sources will not have a significant negative impact on the natural environment or the community. Cumulative impacts should also be taken into account.’

### **New Policy Recommendation – ‘Dark Skies’**

We strongly recommend including a policy on ‘**Dark Skies**’ to protect wildlife. There are 3 County Wildlife Sites within the NP area which support various wildlife species. Light pollution has an overall negative impact on bats and other wildlife, and species are affected in many different and numerous ways. It is imperative for the protection of wildlife that each of these: wildlife roosts, foraging habitat and commuting routes are protected from artificial lighting. Specific reasons for this are given in the best practice guidance as indicated below.

We recommend the following wording (or similar) for a new policy on Dark Skies:

- ‘Development proposals are required to address light spillage and eliminate all unnecessary forms of artificial outdoor lighting.’

- Development proposals should demonstrate compliance with best practice guidance for avoiding artificial lighting impacts on bats (<https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>). Where lighting cannot be avoided altogether in proposals then it must be designed to avoid light spill onto wildlife roosts, foraging habitat, and commuting routes for bats, birds, and other species.'

For the benefit of any planning applications making reference to this policy, we recommend that reference to this best practice guidance is included in the plan.

### **New Policy Recommendation – ‘Biodiversity and Green Corridors’**

There are 3 County Wildlife Sites within the NP area, one of which is also Ancient woodland. Local Wildlife Sites are vital havens where much of our important wildlife lives, including rare species. They act as stepping stones for wildlife across the wider landscape. Therefore it is important that they are afforded as much protection as possible.

We strongly recommend including a new policy to enable development to proceed in a way that provides robust protection for the the County Wildlife Sites within the NP area. (This is in addition to the more general protection offered in Local Plan policies.) We recommend including ‘buffer zones’ in the policy wording below as these are designed to protect sensitive landscape patches and areas of high biodiversity. They provide important protection from the impacts of development.

The Environment Act 2021 makes a 10% biodiversity net gain mandatory from end of January 2024. The State of Nature report highlights the significant historical losses that have occurred across the UK and safeguarding what remains of our natural heritage is a vital cornerstone in nature’s future recovery. Given the pressures facing biodiversity, we recommend a greater ambition of 20% should be set to provide greater confidence in genuine gains for biodiversity and ensure the successful recovery of nature in Norfolk. Natural England’s biodiversity net gain study (Vivid Economics, June 2018) also found that a biodiversity net gain scenario of up to 20% was not expected to affect the financial viability of housing developments.

We therefore recommend the following wording (or similar) for a new policy on ‘**Biodiversity and Green Corridors**’ (This wording is largely taken from Policy 7 of the Lingwood & Burlingham draft Neighbourhood Plan which provides a good example of such a policy.):

‘The importance of the area for wildlife will be safeguarded, retained and habitats enhanced through positive action as part of the development process. Where required, a 20% Biodiversity Net Gain (BNG) should be achieved in the following ways:

- Delivery of BNG on site wherever possible. If it can be demonstrated that this is not feasible, or BNG delivered offsite is demonstrated to be of greater ecological benefit, then delivery elsewhere in the Parish boundary should be explored prior to the use of credits.
- Contribute towards enhancing, restoring or maintaining existing green infrastructure such as county wildlife sites, priority habitats or green corridors to those sites.
- Development will deliver or extend habitats onsite to mitigate the loss of these valued habitats through fragmentation.
- Provide a higher percentage of native species, in comparison to non-native species, in their soft landscaping plan, with all new landscaping schemes designed to achieve clear ecological objectives (provide for pollinators; improve local habitat connectivity; provide missing habitat etc.

- Development should incorporate green roofs and green walls as appropriate, including on any new community buildings.
- Buffer zones should be implemented around sensitive wildlife sites, including County Wildlife Sites, as appropriate, to minimise development impacts on these sites.'

Yours sincerely,

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