Appendix 1 – Securing Positive Benefits

1. **The list of measures and features identified in the guidance - are these the appropriate ones, and are there any others that should be included?**

   The guidance is welcomed and will be useful in helping to deliver NPF4 policy on the nature crisis. The list is comprehensive and some of the more innovative measures such as wildlife friendly lighting and wildlife towers will broaden existing knowledge.

2. **The level of detail provided on each of the individual measures and features – is there adequate information set out to inform understanding of the range of biodiversity measures that can be incorporated in a development?**

   The information is extensive, yet also fairly generic as it does not and cannot account for site specific circumstances. For a planning authority with no in-house ecological expertise, the guidance does not assist planning officers in deciding what specific measures would be most suitable for a particular site. Therefore, access to local biodiversity data and expertise will be needed when required.

   Additionally, the guidance does not assist in influencing developers to choose more challenging measures (such as living roofs and green walls), it is proving challenging to promote these where there are easier 'off the shelf' or generic solutions (for example cutting holes in fences for hedgehogs and provision of bird and bat boxes).

   There is a lack of information on the scale of biodiversity measure/s required to ensure a positive benefit. The addition of case studies across a variety of sizes and types of developments with different site conditions would be welcomed. The guidance does not include proposals requiring a metric to evidence that there has been a net gain in biodiversity.

   The identification of measures that are complementary to one another is helpful when thinking about implementation of a package of biodiversity measures on a site.

   Suggestions regarding the level of detail:

   - Case studies would be helpful in building an understanding of what successful delivery of biodiversity measures looks like.
   - Further regional species/habitat information would assist planners to ask developers for appropriate measures
   - Information on scale for each size development (such as how many trees/ 25% of area planted/ what size SUDS). As it is, it is not instructive enough for planners to assess
   - Improve table appendices. Each measure could have a list of positives and negatives within the description section

- How can we evidence there has been a positive benefit for biodiversity. A metric for the planning authority to evidence the scale of benefit would be helpful.
- The section 'Planting for Nature' could highlight the importance of existing habitats and mature plants/trees and what effect removal and the disruption construction might cause (illustrating the mitigation hierarchy)
- Suggested amendment to point 21: 'Native species appropriate to the area **and site conditions (e.g. soil, exposure, existing habitat**) should be chosen…'
- Section 'Homes for Nature': Point 25 refers to dangers from roads for example, but could present more solutions for these dangers, possibly under a 'moving around' or 'wildlife highway' measure. Could fit under Measure 12, but other mammals and amphibians would benefit from similar designs (lower kerbs, tunnels under busy roads)
- Measure 10: Will this lead to the easy option (bee bricks) always being used and not support the high number of ground nesting bees?
- Measure 17: Under complementary measures, can wildlife towers also have living walls or roof?

3. **The clarity and accessibility of the guidance as a means of a) informing project design, and b) decision making on the measures to be included in individual applications?**

The guidance is very welcomed, it illustrates a wide range of potential measures. However, with regards to assisting with decision making, although the guidance offers opportunity for planners to raise alternatives, it doesn't commit developers to think about different options other than the easy tick box. Again, for those Planning Authorities with a lack of in-house biodiversity expertise there is concern that opportunities are not being fully realised. Without accessing local data and ecological expertise there is at risk that the biodiversity enhancement measures most appropriate to sites are not being delivered.

On accessibility in general:

- There is a lot of text so welcome reference to the addition of the graphics and examples as this will sharpen the guidance, especially if it enables some text to be removed.
- Some points get lost that do not have their own section – could there be a section that more clearly identifies and describes the key/universal principles such as the mitigation hierarchy, landscape scale, locally important habitats and species and so on
- Complementary measures could be done more visually e.g. table. There is an opportunity to reduce number of tables and embedded with the specific measures to reduce the size of the guidance
- The links throughout are really helpful, could include links to local biodiversity partnerships (or another place that lists these) For example NESBiP has a Developer Hub with lots of useful biodiversity information.
  Point 27 – the scoring is not very clear and refers to two scales (only one on the document)

Other comments

- Additionally, Planning Authorities would benefit from wider detailed guidance to complement the other parts of NPF Policy 3 and covering all types of development, including householder. For example, guidance on aspects such as services from nature, nature based solutions and the linkage with NPF4 Policy 2 on climate change would be helpful.