

| Document section        | Summary of the main issues raised   | Representors   | Council response including any changes proposed  |
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| Section 1: Introduction | The content of this draft Biodiversity Net Gain SPD aligns much more closely with the SADPD which awaits Examination rather than the adopted Plan document from 2017.   | Cashtal Properties Ltd   | <p>The first draft BNG SPD was prepared in anticipated of the SADPD being adopted in early 2022 but the examination process took longer than expected. The SADPD has now been examined, found sound and adopted in December 2022.</p> <p>The BNG SPD provides guidance on environmental policies of the CELPS but has been designed to align closely to the SADPD, in particular to policies 'ENV1 Ecological Network' and 'ENV2 Ecological Implementation'.</p>   |
|                         | All staff and elected members involved in consideration of biodiversity issues relating to planning decisions need to be adequately trained and mentored  | Peak District National Park Authority  | Staff and elected members have undertaken training in BNG matters and CPD related to this agenda is an on-going requirement and practice for in-house ecologists who provide internal training to planning staff.  |
| Section 2               | CPRE recognise SA and SEA not required of the document  | CPRE Cheshire  | Cheshire East Council are of the view that SEA and SA are not a required part of the process related to the production of this SPD.  |
| Section 3               | This section could be considerably strengthened by conveying the urgency that the interlinked climate and biodiversity crisis means for making biodiversity net gain  | Mr. Christopher Thornton   | Noted. Further explanatory text has been included in the introductory parts of the document.   |
|                         | We recommend that a reference should be included to the climate emergency and the harm to biodiversity that will arise consequently in the future.  | CPRE Cheshire  | As above   |
|                         | <p>We consider that no further work can proceed on the emerging BNG SPD until:</p> <p>1. The objections to the emerging SADPD in relation to biodiversity net gain have been resolved through independent examination; and/or</p> <p>2. The Environment Bill has received royal assent and there will undoubtedly be transition arrangements in place for authorities whereby adopted development plans do not place such a burden on developers. Appendix 1 of the BNG SPD seeks to address strategic environmental assessment and habitat regulations assessment screening and it concludes that no significant environmental effects would arise as a result of the SPD.</p> | <p>Bloor Homes (NW) Ltd</p> <p>Jones Homes &amp; Persimmon Homes ( Jones Homes &amp; Persimmon Homes</p> | <p>The first draft BNG SPD was prepared in anticipated of both the progression of Environment Act being implemented , and the SADPD being adopted in early 2022. However the examination process for the SADPD took longer than expected. The SADPD has now been examined, found sound and adopted in December 2022.</p> <p>The BNG requirements of the Environment Act come into force in November 2023 and it has been prudent to delay progression of this SPD to allow for the emergence of further guidance on how the Act should be implemented, and also await for the publication of associated regulations.</p> <p>The BNG SPD provides guidance on environmental policies of the CELPS but has been designed to align closely to the</p> |

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|  |   |   | <p>SADPD, in particular to policies 'ENV1 Ecological Network' and 'ENV2 Ecological Implementation'.</p> <p>The points raised have now been resolved.</p>   |
|  | <p>It may be prudent for the Council to delay the progression of the Biodiversity Net Gain SPD until the Environment Bill is passed into law. This would enable the Council to reflect the requirement to deliver a 10% net gain in biodiversity within the SPD, rather than providing only limited guidance beyond that set out in the Local Development Plan.</p> | Gladman Developments Ltd  | <p>As above, the Bill is now enacted.</p>  |
|  | <p>The Framework does not advocate a blanket approach to biodiversity net gain and it does not promote a quantitative metric calculator for identifying whether a net gain can be achieved.</p>   | Bloor Homes (NW) Ltd<br>Jones Homes & Persimmon Homes ( Jones Homes & Persimmon Homes | <p>The wording in this section has been updated to reflect the point raised and to set out the preference for using a quantitative metric.</p>   |
|  | <p>The Council must in the first instance seek to fully understand the consequences of applying the BNG SPD as drafted in terms of viability, site capacities and the overall strategy and objectives of the Cheshire East LPS.</p>   | Bloor Homes (NW) Ltd<br>Jones Homes & Persimmon Homes ( Jones Homes & Persimmon Homes | <p>Viability of the primary policies which this SPD provides guidance on was considered during the examination of the SADPD. No viability problems were identified.</p>  |
|  | <p>There is no evidence that the Council has sought to understand the implications of the Draft BNG SPD for the requirements for a deliverable supply of sites.</p>   | Bloor Homes (NW) Ltd  | <p>As above</p>  |
|  | <p>The detailed guidance set out in the BNG SPD should only relate to the policies of the adopted development plan, in accordance with national policy and the legal framework governing the remit of supplementary planning documents.</p>   | IM Land   | <p>The first draft BNG SPD was prepared in anticipated of both the progression of Environment Act being implemented , and the SADPD being adopted in early 2022. However the examination process for the SADPD took longer than expected. The SADPD has now been examined, found sound and adopted in December 2022.</p> <p>The BNG requirements of the Environment Act come into force in November 2023 and it has been prudent to delay progression of this SPD to allow for the emergence of further guidance on how the Act should be implemented, and also await for the publication of associated regulations.</p> <p>The BNG SPD provides guidance on environmental policies of the CELPS but has been designed to align closely to the SADPD, in particular to policies 'ENV1 Ecological Network' and 'ENV2 Ecological Implementation'.</p> <p>The points raised have now been resolved.</p> |

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|            | The SPD requires amendment to stipulate that BNG should not increase the risk of bird-strike hazard within 13km of the airport  | Manchester Airport Group   | The point is noted and the SPD has been updated accordingly to clarify the approach to BNG within the Manchester Airport Consultation zone and provide a link to digital mapping for applicants. |
| Section 4  | We advise that this section includes clarification that Biodiversity Net Gain (BNG) does not replace existing environmental legislation or policy requirements. This includes the application of the mitigation hierarchy and BNG does not apply to development subject to the Habitats Regulations         | Natural England  | Noted, document updated accordingly.   |
|            | In answer to the question in paragraph 4.1, whether smaller sites should consider biodiversity net gain, we believe there should be a commitment to ensure a minimum of 10% Biodiversity Net Gain for all developments in Cheshire East and this must be highlighted in the Supplementary Planning Document | The Environment Agency   | Explanatory text has been included in regard to small sites  |
|            | the SPD's progress should be held in abeyance until the BNG legislation within the Environment Bill passes into law, with the associated DEFRA metric endorsed and finalised by government  | Barratt David Wilson North West, Barratt Homes Manchester, Bellway Homes, Taylor Wimpey Homes and Redrow Homes | Plasesee comments above  |
|            | We note that DEFRA will be introducing a "small sites" metric and the SPD should commit to being fully consistent with this to ensure clarity for developers.   | Jones Homes & Persimmon Homes ( Jones Homes & Persimmon Homes  | A <a href="#">small sites metric has been published</a> . The SPD has been updated to reflect this guidance.   |
|            | Achieving the "greatest" BNG is not a requirement of national policy and should not therefore be sought within the SPD. It also fails to reflect other valid constraints/considerations which may arise on site which mean that the greatest BNG cannot be achieved.  | Harrow Estates plc and Avro Heritage Ltd   | Noted, the wording in the document has been changed in the interests of clarity.   |
|            | The provision for off-site mitigation should be incorporated into §4.4(d) for consistency with the broad approach advocated elsewhere in the draft SPD.   | Bourne Leisure Limited   | This has now been addressed in the document.   |
|            | Recommendation (2) At §4.4 clarification needs to be added to confirm that this is a data gathering exercise, and not a field-based exercise.   | Barratt David Wilson North West, Barratt Homes Manchester, Bellway Homes, Taylor Wimpey Homes and Redrow Homes | This has now been addressed in the document.   |
| Section 5. | acknowledging that the ecological networks are likely to evolve into Local Nature Recovery Strategy Networks which will play an important role in guiding the delivery of BNG going forward   | Natural England  | This has now been addressed in the document.   |
|            | The Ecological Network Map is difficult to decipher.  | Transition Wilmslow  | A link to a digital version of this map has been included and the original image removed.  |
|            | production of the SPD should be delayed until the adoption of the SADPD so that the evidence can be tested properly, and it can be demonstrated that the two documents clearly align.   | Harrow Estates plc and Avro Heritage Ltd   | See comments above   |

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|           | canal corridors may also be recognised as potential 'off site' ecological assets for habitat provision (section 8.11), and prioritised for projects where additional benefits need to be sought. Offsite commuted sums could be used to provide biodiversity net gain along our waterways, where these can't be secured on site.  | Canal & River Trust  | To consider   |
|           | For the avoidance of doubt it is necessary that this section makes clear what type and scale of application or development will be subject to these requirements.   | Bourne Leisure Limited   | Type and scale of application referenced  |
|           | At §5.3 the guidance should be updated to make clear that the Core Area can be delivered off-site or potentially through the use of 'Biodiversity Credits' to be brought in under the Environment Bill. This can be achieved by including "on or off the development site" following "the size of the core area":   | Barratt David Wilson North West, Barratt Homes Manchester, Bellway Homes, Taylor Wimpey Homes and Redrow Homes | To consider   |
|           | The requirements should be proportionate, and the text should be re-worded to clarify the types of application to which this requirement will apply.  | Harrow Estates plc and Avro Heritage Ltd   | To consider   |
| Section 6 | it would be more appropriate to produce the SPD once the relevant legislation has reached Royal Assent, and the final version of the metric has been published  | Bourne Leisure Limited   | See comments above  |
|           | Gladman recommend that the Council consider allocating land to specifically provide opportunities for offsite mitigation of the effects of new development on biodiversity. This would be a proactive approach to ensuring a net gain in biodiversity can be achieved by all new development, where offsite mitigation is required.   | Gladman  | Not possible.   |
|           | The other triggers for requiring application of the metric are unclear. To ensure there is no doubt when an application would trigger this requirement "all other developments effecting natural or semi-natural habitats" and a "transport scheme" should be more clearly defined or explained to assist in transparency of the Council's application of this requirement. | Bourne Leisure Limited<br>Harrow Estates plc and Avro Heritage Ltd   | To consider. New wording has been introduced at X to further clarify the position in this regard    |
|           | Consider whether each change to a layout requires BNG – what parameters are reasonable?   | Bourne Leisure Limited   | To consider   |
|           | The SPD appears to suggest at §6.3 that there will be a requirement for a different BNG calculation if a layout changes. This requirement is considered to be disproportionate.   | Harrow Estates plc and Avro Heritage Ltd   | To consider   |
|           | The SPD should make it clear about what level of detail is expected for the different types of planning application e.g. outline, reserved matters or full planning applications.   | Jones Homes & Persimmon Homes ( Jones Homes & Persimmon Homes  | Further guide has been provided at section X regarding  |
|           | It is not clear to an applicant how 'pollution' should be interpreted and how the direct and indirect effects of a development in terms of pollution should or are expected to be calculated.   | Bourne Leisure Limited   | To consider   |
|           | §6.6 as currently drafted is inaccurate and therefore needs to be removed; the current metric (2.0) does not allow for indirect impacts to be input into the calculator   | Barratt David Wilson North West, Barratt Homes Manchester, Bellway Homes, Taylor Wimpey                        | Use of latest metric included in the latest version. Further guidance provided on indirect impacts. |

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|           |  | Homes and Redrow Homes   |  |
|           | We would strongly suggest that reference to the Cheshire Wildlife Trust is removed from paragraph 6.8 due to the potential perceived conflict of interest.   | Barratt David Wilson North West, Barratt Homes Manchester, Bellway Homes, Taylor Wimpey Homes and Redrow Homes   | Reference removed  |
|           | Clarity is requested in relation to §6.10. It states: The survey and calculation should include the whole of the development boundary (red line) and adjacent land where direct or indirect impacts upon adjacent habitats are anticipated. As written the emerging SPD suggests surveys will be required to look at land within the red edge but also land beyond. It is not clear what would trigger a requirement to consider land outside the red edge.  | Bourne Leisure Limited<br><br>Barratt David Wilson North West, Barratt Homes Manchester, Bellway Homes, Taylor Wimpey Homes and Redrow Homes<br>Harrow Estates plc and Avro Heritage Ltd | The document has been updated to clarify the circumstances under which land outside the red-line boundary will be considered for the purposes of BNG calculations. |
|           | The survey and calculation should NOT be required to consider or include (undefined) 'adjacent' habitats. It should focus on the red line area.  | Mineral Products Association   | The document has been updated to clarify the circumstances under which land outside the red-line boundary will be considered for the purposes of BNG calculations. |
|           | The SPD should make reference to use of future subsequent versions of the metric.  | various  |  |
|           | Identify phrases that need clarifying in the glossary 'low distinctiveness' 'poor condition' etc.  |  | The glossary has been updated.   |
|           | The statement that creation of low distinctiveness habitats can only ever reach poor condition is harsh given that the SPD specifically encourages developers to incorporate biodiverse habitats into the site's green infrastructure. There are many examples of design guidance that focusses on biodiversity. The SPD should provide more encouragement for developers to build biodiverse-friendly habitats into new urban habitats. We suggest that this is re-worded to state that low distinctiveness habitats will normally be expected to achieve poor condition, unless the applicant can demonstrate how moderate or good condition would be achieved for the site in question. | Jones Homes & Persimmon Homes ( Jones Homes & Persimmon Homes - 1274852)   | noted  |
|           | The wording of the SPD at §6.14 regarding pre-development habitat value should be rephrased to more precisely reflect the emerging legislation in the Environment Bill   | Bourne Leisure Limited   | The section has been updated to more closely reflect the legislation.  |
| Section 7 | General support for use of the mitigation hierarchy  |  | noted  |
|           | Harrow broadly supports the suggested approach to applying the mitigation hierarchy but considers that there should be scope to agree mitigation with the Council during the application process   | Harrow Estates plc and Avro Heritage Ltd   | noted  |

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|           | For outline applications, it may not be possible or reasonable for a developer to provide detailed information on how or where off-site measures will be delivered. This statement of the mitigation hierarchy should be accompanied by a recognition that for outline applications, sufficient information should be provided to give the LPA confidence that BNG can be secured through conditions or obligations attached to the outline permission. | Jones Homes & Persimmon Homes ( Jones Homes & Persimmon Homes  | Noted and clarification provide in the document                                |
| Section 8 | It would be beneficial to provide clarity on the preference for on-site provision of BNG and that the Council will only consider off-site provision when it has been adequately demonstrated that net gains cannot be achieved on-site. Natural England advise that off -site provision should always be located as close as possible to where the losses in habitat will occur   | Natural England  |  |
|           | Section 8 places the onus entirely on the developer to prepare a package of measures in advance of a planning application submission and ensure deliverability and long-term management arrangements. This puts a great deal of burden on the developer and is likely to result in an ad-hoc and inconsistent approach in terms of planning applications. A simple mechanism for S106 should be put in place, led by the Council.                       | Bloor Homes (NW) Ltd<br><br>Jones Homes & Persimmon Homes ( Jones Homes & Persimmon Homes                      | It is the developers responsibility to demonstrate how will achieved net gain. |
|           | 8.5 inconsistent with earlier parts of the document. Agreement mechanism for offsite/onsite delivery not set out. Monitoring and management plan needs to be proportionate.   | Bourne Leisure Limited   | noted  |
|           | Recommendation (9) Clarification is required at §8.5(d) to make clear the meaning of the term 'strategically important'.<br>Recommendation (10) Clarification is required at §8.5(g) to make clear which bodies will run the proposed 'offset register'.<br>Recommendation (11) Clarification is required at §8.5(h) to make clear which bodies will be responsible for 'monitoring'.   | Barratt David Wilson North West, Barratt Homes Manchester, Bellway Homes, Taylor Wimpey Homes and Redrow Homes | noted  |
|           | Consider including model clauses at 7.5   | Bloor Homes (NW) Ltd   | noted  |
|           | 8.6 This should be amended to read "pay reasonable professional fees associated with the above, up to an agreed sum".   | Mineral Products Association   | noted  |
|           | 8.7 clarify what 'detailed worked up proposals' means   | Bourne Leisure Limited   | noted  |
|           | For outline applications, sufficient detail should be provided to demonstrate that there is no reason for the LPA to consider that BNG cannot be delivered through planning condition or obligation.  | Jones Homes & Persimmon Homes ( Jones Homes & Persimmon Homes  | Noted and document updated   |
|           | Harrow therefore considers that flexibility should be introduced to the guidance and would suggest that the wording "where possible" is added to the end of the first sentence of §8.11.  | Harrow estates   | noted  |
|           | The Council needs to provide resource to identify land parcels suitable for offsite solutions and create a geodatabase of sites that have been assessed and verified as potential offset sites. This would create a more open market.   | Jones Homes & Persimmon Homes ( Jones Homes & Persimmon Homes  | This is not the role of the council currently.                                 |

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|                    | General support for offsite provision and recognition that this may be some distance from the development site   | various  | noted  |
|                    | the document needs more clarity on how the Council will assess and weigh off-setting BNG schemes in non-strategic locations.   | Jones Homes & Persimmon Homes ( Jones Homes & Persimmon Homes  |  |
| Section 9          | 9.1 - Consistency is needed with para 4.1  | Jones Homes & Persimmon Homes ( Jones Homes & Persimmon Homes  |  |
| 9.14               | In the first instance we note that the Council will receive a fee for the determination of the planning application and as this work will form part of the application process there is no clear justification for an additional fee. If this fee is to be applied, the precise fee should be identified, evidence should be provide to show why it cannot be covered by the planning application fee and evidence should be provided to show how the figure identified has been derived. Harrow is concerned that the unit costs identified and set up fees seem high and no clear explanation is provided to demonstrate how these costs have been derived so it is not clear whether they are justified.  | Harrow Estates plc and Avro Heritage Ltd<br><br>Barratt David Wilson North West, Barratt Homes Manchester, Bellway Homes, Taylor Wimpey Homes and Redrow Homes | Approach to fees updated with updated explanation. |
|                    | The Council's proposed admin fee of £1,200 per unit seems reasonable, but there should be a basis of calculation provided for transparency   | Jones Homes & Persimmon Homes ( Jones Homes & Persimmon Homes  | Approach to fees updated with updated explanation. |
|                    | Gladman submit that the formula and a breakdown for these costings (and any subsequent updates) is provided for review and comment.  |  | Approach to fees updated with updated explanation. |
|                    | 9.22 we would welcome standard templates for both conditions and s106 agreements as they would help avoid any delays with decision making.   |  | Included in Appendices                             |
|                    | No break-down is provided at §9.23 on how the set-up fee has been calculated (at £6,945). In any event, and especially if these costs are from Cheshire Wildlife Trust, the future draft of the SPD needs to provide additional evidence justifying this figure. It is not considered to be reasonable as drafted, without this justification. The £6,945 set-up fee per agreement seems high for simple agreements. We appreciate the benefits of a simple charging structure, but we suggest the Council might consider a two-band structure with a lower charge for small schemes and/or situations where a new management plan does not need to be prepared. In any case, the £6,945 should be clarified in terms of staff time, in the interests of transparency. |  | Approach to fees updated with updated explanation. |
| Section 10<br>10.1 | It is not clear how an 'approved' organisation will be defined and agreed by the LPA. Harrow considers that details should be provided as to how these "approved responsible" bodies will be identified as this information is not currently provided in the SPD.  | Bourne Leisure Limited<br><br>Harrow EStates   | noted  |

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| 10.1       | Section 10 needs to be strengthened to include a detailed process for coming to these legal agreements with developers including a list of appropriate sanctions if they will not comply. Therefore, there should be a recommendation that the biodiversity agreement MUST BE IN PLACE before the development starts.   | Bollington Town Council  | noted   |
| 10.4       | We disagree that all High Distinctiveness habitats require a specialist contractor to implement, and we are not convinced that this will be enforceable. We suggest that this requirement is modified to state that for high distinctiveness habitats, the developer's ecologist should provide assurances of the ability of the contractor to implement the habitat establishment  | Jones Homes & Persimmon Homes ( Jones Homes & Persimmon Homes  | noted   |
| 10.5       | At §10.5 the SPD notes that the implementation of off-site habitat creation proposals will be secured by means of a section 106 agreement. Whilst this approach is welcomed, Bourne Leisure considers that the option of securing proposals by means of a negatively worded 'Grampian' condition should also be included in this section.   | Bourne Leisure Limited   | noted   |
| 10.6       | Harrow notes that §10.6 of the SPD requires that all development proposals must also include proposals for the incorporation of features to enhance the biodiversity of the resulting development in addition to proposals for habitat creation and enhancement as assessed by the biodiversity metric calculation. Examples identified include green wall and green/brown roofs, and features for nesting birds and bats. Harrow is concerned that this requirement is effectively seeking additional biodiversity enhancement when proposals will already be subject to significant biodiversity requirements through the metric. It is not considered that this approach is justified as the Council will effectively be 'double charging' in order to achieve additional biodiversity gain.                 | Harrow Estates plc and Avro Heritage Ltd   | Approach clarified and updated in the document  |
| 10.7       | We do not consider that the wording of §10.7 (page 24) is currently appropriate, as it states that where schemes that are classed as 'minor AND not affecting natural/semi-natural habitats', they will be exempt from having to be put through the Defra metric. We consider that all minor and small-scale major applications should be exempt. This approach would remain consistent with the adopted and emerging Development Plan Documents as they would still have to demonstrate ecological enhancement, using appropriate features from (a) – (k) in §10.8. (18) The reference to natural and semi-natural habitats should be removed from paragraph 10.7 and replaced by a scale-based approach which would remain consistent with the Development Plan whilst continuing to ensure BNG is delivered. | Barratt David Wilson North West, Barratt Homes Manchester, Bellway Homes, Taylor Wimpey Homes and Redrow Homes | Legislation has been updated to clarify the position, the updated document reflects this. |
| 10.8       | The list of BNG features is good, but more guidance is needed on what is actually expected and what a planning officer and small developer should agree on without specialist knowledge. Again, this indicates that a Biodiversity SPD should precede or incorporate the BNG SPD. Alternatively, the Cheshire East Design Guide could be amended to incorporate advice on BNG measures.   | Jones Homes & Persimmon Homes ( Jones Homes & Persimmon Homes  | noted   |
| Section 11 | We advise the Ecological Network Map should be made available as an online interactive map and with GIS shapefiles for download and use.  | Jones Homes & Persimmon Homes ( Jones Homes & Persimmon Homes  | noted   |
|            | Whether within the red line of a proposed development or at an offsite area, an isolated area of gain for biodiversity will be of limited value if there is not an identified   | Mr Roger Cole  | noted   |



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|            | corridor or stepping ability to a wider natural environment. In all cases the developer should be required to demonstrate that this linking is identified within the proposal.   |  |   |
| Section 12 | England Trees Action Plan and Peat Action Plans introduce actions to research further protections for such habitats. We suggest that there is merit in referring to these strategies and perhaps deferring more detailed guidance on buffer zones pending the outcome of these pieces of research.   |  | Guidance on buffer zones has been included  |
| Section 13 | Table 1 has a vague heading– states CWT BNG. Clarification is required on the purpose of this table and if this is a Cheshire Wildlife Trust (CWT) or Cheshire East requirement, Tables 2 and 3 are not appropriately titled and reference is again made to CWT. Full clarification is required on how the costs and prices have been calculated for transparency as expected from a local authority.  | Jones Homes & Persimmon Homes ( Jones Homes & Persimmon Homes  | Table updated, references updated   |
| 13.4       | Accelerated succession will not be an option in Defra metric 3.0 and sites which are suitable for woodland creation may not always support existing grassland. Finer detail and more clarification is needed on this point.  | Jones Homes & Persimmon Homes ( Jones Homes & Persimmon Homes  | noted   |
|            | Recommendation (20) Land should not be designated as Potential Local Wildlife Sites unless there is a realistic chance of habitats being proposed, we would instead suggest that future monitoring of land to assess its suitability against the Local Wildlife Sites Criteria.  | Barratt David Wilson North West, Barratt Homes Manchester, Bellway Homes, Taylor Wimpey Homes and Redrow Homes | noted   |
|            | Recommendation (14) A breakdown should be included to justify how the figure of £1,200 covering Cheshire East Council's costs is arrived at, given that we are not aware of other Local Authorities who charge such a fee.   | As above   | Noted and approach modified   |
|            | Recommendation (16) It is essential that a break-down of the £6,945 set-up fee is provided as justification to Table 1, to ensure the SPD is robust and reasonable.  | As above   | Noted, approach modified  |
|            | It is therefore essential that the SPD is explicit in stating that the BNG metric will not be applied to sites which already benefit from outline planning permission, given that to introduce this would go beyond the scope of a Reserved Matters submission. This is a key point that the guidance needs to cover as both the adopted LPS and the emerging SADPD refer only to Net Gain being delivered within 'development proposals', and does not differentiate between Full, Outline, and Reserved Matters submissions. | As above   | Noted, approach modified and reference to how outline applications should be dealt with is included |