

Mr David Reed BSc DipTP DMS

Dear Mr Reed,

Guildford Local Plan Part 2 Examination: Development Management Policies

Thank you for giving me the opportunity to comment on document ED-GBC-LPDMP-010 "BNG Capacity in Guildford Note"

As a local naturalist I reiterate my support for Guildford Borough Council in taking a positive approach, adopting a BNG level of 20%, and demonstrating why this is acceptable.

Biodiversity is a cornerstone of environmental sustainability that is essential in maintaining the ecosystem that supports our food production and mental wellbeing. We are facing a biodiversity crisis. Locally, increasing visitor pressures are degrading Guildford's special habitats. Guildford Borough is in the front line of environmental degradation through unsustainable development imposed upon it. In these circumstances I believe the bar should be set higher still.

Guildford has habitats of international importance - the Thames Basin Heaths to the north and the Chalk Grasslands and Woodlands to the south. BNG ignores the wider impacts of development on biodiversity beyond the boundaries of a site and in that respect it is a blunt instrument.

SSSI's such as The Sheepleas, which includes Surrey's Coronation Meadow, are being degraded by various visitor pressures and it is not possible to maintain such habitats using optimal grazing techniques in the presence of large numbers of dog walkers. Biodiversity is suffering as a result. Eventually, if these special habitats and their associated species are to be maintained, it will become necessary to impose limitations on access and activities or to accept that the decline of biodiversity across Surrey will continue to accelerate. These are outcomes that I believe the NPPF seeks to avoid. SANG has not deterred the increase in pressures on these key habitats and the valued landscapes which gave rise to them. These are reasons to set the bar as high as possible.

A higher level would help to direct development towards genuinely sustainable sites in Guildford, or elsewhere, to meet any genuine housing need. That would be a positive outcome.

Site viability is a financial matter and I suggest that maintaining and enhancing biodiversity is of far greater importance than the profit that can be made from individual developments that destroy habitats and their wildlife.

Yours sincerely

Harry Eve

30th November 2022