

Dear Sir or Madam

I am replying on behalf of the Burgess Hill Town Council Planning Committee. We have discussed the proposed changes and have many comments that we would hope will make for a better document.

As far as we are aware, the underlying calculations to determine the current level of biodiversity and predicted future levels of biodiversity are not openly available which makes it challenging for an ordinary resident to demonstrate BNG to the satisfaction of the planning authority. We are also concerned that biodiversity and BNG calculations will not lead to the outcomes envisaged at the application stage because the algorithms are not subject to scrutiny.

We would recommend additional guidance on how any BNG plans will be monitored and enforced by the Planning Authority. Any BNG proposals will take some time to come to fruition – what measures exist to ensure compliance over the short, medium, and long term time horizons? Furthermore, DEFRA does not intend to provide central monitoring of how well on-and off-site biodiversity gains are being enforced by local authorities. How will this be resolved especially when BNG takes place out of the district?

DEFRA also expects local authorities to generate income from such BNG legal agreements which will be especially relevant with larger applications. We would advise transparency in the document on where such revenues will be invested and would recommend that those funds be allocated for environmental protection causes.

We also recommend that an order of preference be devised to ensure that any BNG be accrued as close as possible to where it is lost. Some sort of hierarchy whereby BNG should be within the built-up area of the town, followed by within neighbouring towns, and only outside of the district at an absolute last resort would seem reasonable.

We appreciate that the district is simply operationalising law made at Westminster so there may be limited flexibility. But we believe that providing applicants with absolute clarity and coherence would be best for all parties in delivering the BNG we all wish to see.

Yours Sincerely

David Eggleton

Chair, Burgess Hill Town Council Planning Committee