

**From:** Jones, Laura [mailto:Laura.Jones@naturalengland.org.uk]  
**Sent:** 10 June 2020 10:30  
**To:** Matthew Diamond <Matthew.Diamond@exeter.gov.uk>  
**Cc:** Horn, Darren <Darren.Horn@naturalengland.org.uk>  
**Subject:** [SUSPICIOUS MESSAGE] FW: 2020-06-25 318717 Development of a Co-Living (Sui Generis) accommodation block & hotel 19/1556/FUL Exeter CC

Dear Mr Diamond,  
Thank you for forwarding this response on to Natural England.

We positively recognise the Net Gain result, however Natural England does not currently have a role in assessing BNG. Our role is to raise awareness and point the applicant to policy. It will be the Local Planning Authority to decide whether what is proposed is in line with national and local policy.

Also to note, are sites with a baseline of zero units, e.g. hard-standing, and how to take into account delivering net gain. In these situations, net gain is a numerical increase. For example, 20 biodiversity units or 500m<sup>2</sup> of new green walls. Some LPAs are setting out what a minimum numerical increase should be and this is something to consider when preparing for BNG developments.

Kind regards,

Laura Jones



**Laura Jones**  
**Lead Advisor**  
**Cornwall, Devon and Isles of Scilly Area Team**  
Phone: 02080267476 Mobile: 07775 544994  
**[www.gov.uk/natural-england](http://www.gov.uk/natural-england)**

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

**Coronavirus situation:**

During the current coronavirus situation, Natural England staff are working remotely to provide our services and support our customers and stakeholders. All offices and our Mail Hub are closed, so please send any documents by email or contact us by phone or email to let us know how we can help you. See the latest news on the coronavirus at <http://www.gov.uk/coronavirus> and Natural England's regularly updated operational update at <https://www.gov.uk/government/news/operational-update-covid-19>.

Stay at home, protect the NHS, save lives.

**From:** Horn, Darren  
**Sent:** 04 June 2020 14:01  
**To:** Matthew Diamond <[Matthew.Diamond@exeter.gov.uk](mailto:Matthew.Diamond@exeter.gov.uk)>  
**Cc:** SM-NE-Consultations (NE) <[consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)>  
**Subject:** RE: FAO Mr Matthew Diamond REF: 19/1556/FUL Harlequin Centre, Paul Street, Exeter, Devon, EX4 3TT

Hi Matt,

I now work in the Somerset team and haven't dealt with this application since sending in my response on 4<sup>th</sup> December.

Thank you for also directing this query to the consultations team - they will log it and send it to the Devon and Cornwall team for a detailed response if required.

However, our main advice regarding this application was that it would require an Appropriate Assessment due to recreational impacts on Habitats Sites.

Regards,  
Darren

**Darren Horn**  
Planning Lead Adviser  
Somerset Team  
Natural England  
Sterling House, Dix's Field, Exeter, EX1 1QA  
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**For new consultations or to provide further information on existing consultations please send all correspondence to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)**



**From:** Matthew Diamond [<mailto:Matthew.Diamond@exeter.gov.uk>]  
**Sent:** 04 June 2020 11:42  
**To:** Horn, Darren <[Darren.Horn@naturalengland.org.uk](mailto:Darren.Horn@naturalengland.org.uk)>  
**Cc:** SM-NE-Consultations (NE) <[consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)>  
**Subject:** FW: FAO Mr Matthew Diamond REF: 19/1556/FUL Harlequin Centre, Paul Street, Exeter, Devon, EX4 3TT

Darren

Please see comments below from the planning agent and attached biodiversity net gain calcs. Can you take this into account and provide an updated response?

Regards

Matt

**Matthew Diamond**

Principal Project Manager (Development)  
City Development  
Exeter City Council

01392 265214

**From:** Dadds, Chris [<mailto:Chris.Dadds@eu.jll.com>]

**Sent:** 04 June 2020 11:27

**To:** Matthew Diamond <[Matthew.Diamond@exeter.gov.uk](mailto:Matthew.Diamond@exeter.gov.uk)>

**Subject:** RE: FAO Mr Matthew Diamond REF: 19/1556/FUL Harlequin Centre, Paul Street, Exeter, Devon, EX4 3TT

Matt

It is disappointing that the officer from NE clearly hasn't read the material we submitted with the application.

We provide a Biodiversity Net Gain calculation, using the Natural England Metric, which showed a 616% net gain.

A copy of the submitted material is attached and you might like to draw his attention to it, so that he can update his comments.

Chris

**Chris Dadds**

Director - Planning and Development  
JLL  
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[jll.co.uk](http://jll.co.uk)

**From:** Matthew Diamond <[Matthew.Diamond@exeter.gov.uk](mailto:Matthew.Diamond@exeter.gov.uk)>

**Sent:** 04 June 2020 11:10

**To:** Dadds, Chris <[Chris.Dadds@eu.jll.com](mailto:Chris.Dadds@eu.jll.com)>

**Subject:** [EXTERNAL] FW: FAO Mr Matthew Diamond REF: 19/1556/FUL Harlequin Centre, Paul Street, Exeter, Devon, EX4 3TT

Chris

Please find Natural England's response attached.

Regards

Matt

**Matthew Diamond**

Principal Project Manager (Development)

City Development  
Exeter City Council

01392 265214

**From:** SM-NE-Consultations (NE) [<mailto:consultations@naturalengland.org.uk>]

**Sent:** 04 June 2020 09:16

**To:** Matthew Diamond <[Matthew.Diamond@exeter.gov.uk](mailto:Matthew.Diamond@exeter.gov.uk)>

**Subject:** FAO Mr Matthew Diamond REF: 19/1556/FUL Harlequin Centre, Paul Street, Exeter, Devon, EX4 3TT

Dear Mr Diamond

**Our ref:** 317328

**Your ref:** 19/1556/FUL

Thank you for your consultation.

Natural England has previously commented on this proposal and made comments to the authority in our letter dated 04 December 2019 (copy attached).

The advice provided in our previous response applies equally to this amendment.

The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.

Should the proposal be amended in a way which **significantly** affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.

Yours sincerely

Sally Ireland

Support Advisor – Consultations Team  
Operational Delivery  
Natural England  
County Hall  
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WR2 5NP

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For further information on the Pre-submission Screening Service see [here](#)

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