

From: Irving, Andrew
Sent: 23 September 2019 14:03
To: Buckley, David
Subject: FW: South Caldecotte

Hi David,

Following the meeting last week with Sarah and yourself, I am putting forward further comments in relation to the South Caldecotte development application (19/01818/OUT). These comments are made on the instruction to disregard the sites development allocation.

When the sites allocation is not factored in, it significantly changes the reasonability of the proposals put forward. As explained in my previous emails, our local policies pertaining to biodiversity protection from development have suitable levels of flex in them to permit development where there is a demonstrable need. In this instance, the allocation of the site adequately demonstrated this. However, when this is taken away, the proposals result in impacts to and loss of biodiversity disproportionate to the need for development. As such, I would **object** to the proposals in their current form.

As detailed in the ecological report supporting this development, and my consultation comments, there are *significant* amounts of high quality habitat that will be lost as if these proposals were to go ahead. Further to this there is extensive evidence of protected species and priority habitats on site. The proposals put forward do not comply with the mitigation hierarchy, there appears to have been minimal effort in avoiding and reducing impacts to these key features and the site as a whole before moving straight to mitigation and compensation. The developments design should be revisited to reduce this impact, or an alternative site identified for such works.

Further to this, despite the proposals to mitigate and compensate losses, essential information has not been provided by the developer in order to assess the plausibility of this. There is no Biodiversity Impact Assessment Metric supplied evidencing a net gain for biodiversity through the current proposals.

Quite simply, the present application is not compliant with numerous local and national planning policies.

If the development were to be redesigned to retain and enhance the numerous priority habitats on site (Hedgerows, Ponds, Lowland Meadow, Woodland, Steams & Orchard) it is likely that a significant net gain could be made through the adopting of these features in to a Biodiversity Enhancement Scheme. This would entail the only land taken by development being low value agricultural fields. This would also maintain the ecological connectivity and coherence of the site as a whole.

Kind regards,

Andrew Irving
Countryside Officer