

PublicAccessEDRMS

From: Buckley, David
Sent: 13 March 2020 09:01
To: Buckley, David
Subject: 19/01818/OUT South Caldecotte- Ecology- Update

From: Evans, Diane
Sent: 05 February 2020 19:37
To: Buckley, David
Cc: Palmer, Jonathan; Hine, Sarah
Subject: RE: 19/01818/OUT South Caldecotte- Ecology- Update

These comments relate specifically to the Lowland Meadow habitat and inappropriate use of the submitted BIA metric which renders it unacceptable.

- The agent twice states that the proposal complies with the mitigation hierarchy. However, I am unable to find evidence of this in their submission. It is the developer's responsibility to furnish the LPA with proof that the mitigation hierarchy process has been fully engaged with before opting for off-site biodiversity offsetting.
- The BIA metric submitted in support of the proposal is unacceptable. Although the BIA metric contains a Lowland Meadow classification, the developer's ecologist has chosen to classify the area of Lowland Meadow as "Grassland – Other Neutral Grassland" which is incorrect. The submitted BIA also states that this area of priority habitat is of low strategic significance, which I believe is incorrect as priority habitats are covered in Plan:MK policy NE2:b, NPPF 174:b and Natural Environment Guidance: paragraph 024.
- However, if the correct habitat classification of poor condition Lowland Meadow is entered into the metric, the calculator states "**Any Loss is Unacceptable**". It is not the prerogative of the developer to down-grade a habitat classified as a priority habitat and manipulate the BIA metric in order to generate the result they desire.