

**From:** Charlotte Watkins  
**Sent:** 21 September 2022 12:53  
**To:** David Lowin  
**Subject:** 22/01829/OUT

David

In general the protected species assessments and mitigation have been covered here, or can be within a conditioned CEMP for biodiversity. I only have a few queries regarding updated surveys and results which I will address below.

The major issue here is that the Biodiversity Impact Assessment is showing a really large overall loss for biodiversity (more than 75%) even when proposed habitat creation is taken into account. This would not be acceptable. We seek a minimum of a 10% net gain for biodiversity and it should be demonstrated – even if only in proposal form at outline stage– that this can be achieved and how it will be achieved.

They also need to demonstrate that they have as far as possible tried to achieve this on site, following the mitigation hierarchy, before resorting to off-setting. If compensatory habitat is required off site then a proposed scheme should be identified, along with how the necessary uplift could be achieved, where this would be and how it could be managed ongoing for at least 30 years. Their ecological survey report states – *‘In accordance with the NPPF (2021) a Biodiversity Net Gain (BNG) assessment of the Site will be undertaken to assess the habitats on Site prior to and post development, to demonstrate how the Site will deliver net gain’*. It is not clear that the latter has been done, however if I have missed some information on this aspect please do point me towards it.

There are number of surveys to be updated, for example reptiles. This is not necessarily an issue as they can be conditioned if necessary however within the ecological assessment it states *‘The level of mitigation required will be dependent on the results of the updated surveys however may include a destructive search of suitable reptile habitat or translocation programme; part of the Site may be required for reptile mitigation as part of the translocation exercise’*. Should it be the case that following updated reptile surveys, part of the site will be required for translocation and mitigation - has this been factored into the layout? Will there be enough ‘space’ left to give over to a reptile receptor site? Or if the site is elsewhere could it be clearly mapped? If conditioning the updated surveys we need to know that mitigation is possible.

There are bats on site for which we will need to condition an EPS licence. Bat activity transects are also due to be carried out (or have been) this year. The Ecological assessment states *‘Due to the loss of large areas of woodland along the southern boundary and the time elapsed since the original surveys, updated monthly transect and static activity surveys will be undertaken between April and October 2022. The surveys will aim to determine the importance of these areas to the bat assemblage present and using the Site and complement the existing data from 2019. This information would be included within the Natural England EPS licence’*. Should these surveys show an increased importance to bats of the woodland or to rarer species how would they mitigate for this loss of large areas of woodland? It can be added to the EPS licence but we need to be sure they would obtain a licence and for that we need some proposed mitigation for bats related to the results of the survey.

In short therefore there are some questions as to whether any additional required protected species mitigation can be accommodated on site and importantly how they are going to ensure there is no net loss for biodiversity so that the proposals are acceptable (and then in addition how they will achieve an overall net gain at the level CDC seeks).

Please do get back to me with queries.  
Kind regards  
Charlotte

**Dr Charlotte Watkins**  
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