**From:** Charlotte Watkins
**Sent:** 23 October 2015 23:50
**To:** Matthew Parry
**Subject:** 15/00837/OUT Part land on North East Side Gavray Drive

Matthew

With regard to the above application, my comments from 20/07/2015 below still stand as I believe the site needs to be considered in holistic fashion with the LWS included. Habitat degradation and disturbance is very likely on the LWS as development proceeds around it and recreational pressure is too difficult to quantify in terms of discounting it as minor impact. Although the future of the LWS may be secured when development is proposed to the West of the brook, additional pressure on the LWS will occur with this development with no guarantee of when or if conservation management of the LWS might begin.

However I have assessed the application independently of the LWS as regards site ecology within the red line of the development boundary:

The Environmental Statement makes a fair assessment of the ecological receptors on site and the likely impacts on them. There are no major constraints on site as regards protected species and indirect or potential impacts are largely dealt with by the choice of placementof the Public Open Space, proposed mitigation and reasonable avoidance measures. The additional mitigation measures proposed by Butterfly conservation for white letter hairstreaks are appropriate and would help to fully mitigate for this species and potentially enhance black and brown hairstreaks. In addition to butterflies, five Priority bird species were present on site for which there should also be targeted mitigation.

Part of the site falls within a Conservation Target Area which corresponds to the area set side for Public Open Space. As far as possible this should be managed to meet the aims of the CTA and the ES outlines proposals to do this.

Should permission be granted an ECMS should include an update check for protected species that might have moved onto the site prior to any site clearance if more than 12 months elapses since the last walkover. A biodiversity enhancement scheme should be submitted that demonstrates a net gain for biodiversity can be achieved on site in line with NPPF and Local policy (or this can be part of the LEAMP).  A range of enhancements are suggested but quantity, quality and layout will all have a bearing. The LEAMP should also identify the funding mechanism for management of the various habitats on site in to the future.

Beyond this I do not have any further comments at this stage. Please get back to me if we need to discuss anything else or appropriate conditions in detail.

Regards

Charlotte

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*Office hours: Monday, Tuesday and Thursday mornings.*

**From:** Charlotte Watkins
**Sent:** 20 July 2015 16:54
**To:** Matthew Parry
**Subject:** 15/00837/OUT Part land on North East Side Gavray Drive

Matthew

Further to our discussion last week I wish to submit preliminary formal comments below:

With regard to the application 15/00837/OUT in general the ecological information submitted for the site within the boundary line is OK. However I am  in agreement with the well worded comments submitted by BBOWT on 12th June 2015. The submission of an application which excludes the LWS from consideration whilst at the same time stating there will be additional pressure on it as a result of this application is unacceptable under emerging policy. An ecological plan for the management of the adjacent LWS should be submitted for assessment in conjunction with this application.

I will assess the application site in isolation as regards level of ecological information submitted and whether a net gain is likely as soon as possible. Please let me know if there is a deadline.  I am out of the office until 3rd August but am happy to discuss this further with yourself or the applicants on my return.

Regards

Charlotte

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