

From: Laura Hobbs
Sent: 12 January 2021 10:10
To: Victor Grayson
Cc: Amy Reddick
Subject: RE: Chidswell - Yorkshire Wildlife Trust

Victor,

Thank you for consulting us on the Ecological Design Strategy (EDS). I have the following comments to make:

The EDS does not take into account the precautions to be put in place to protect adjacent AW and LWS from impacts of the development (i.e. increase in footfall, domestic animals, fly tipping/littering etc.). We previously requested, at the minimum, a planted buffer rather than fence line only to protect these sites. The ecologist responded by stating: *'We will address this point by identifying appropriate mixed-species scrub/ tree planting as buffers, within the EDS and subsequently the BMP.'* This is not shown within the current EDS.

We would also like to reiterate our previous comments that: *'Areas of greenspace should be considered to deliver multifunctional benefits and we would recommend that the SuDS on site are also designed in this manner. Those principles outlined by [Building with Nature standards](#) would be highly beneficial to incorporate within this scheme.'*

Whilst we appreciate the consideration given to areas of greenspace included within the proposals in draft format, the EDS does not utilise the metric to demonstrate evidence of a measurable net gain being achieved on site. We would welcome its application to provide confidence over its feasibility of delivery net gains, to be revised and updated at each phase of development coming forward for reserved matters, in support of additional survey information. This is in line with BS 8683 which states in section 5.1.1.2 under Project Feasibility that: *'Using the information, a qualitative and quantitative estimate of the project's biodiversity baseline shall be produced with records of limitations and assumptions made. The quantitative estimate shall use a biodiversity metric in accordance with Clause 4.'* going on to state that *'The estimate of the project's biodiversity baseline shall be used to assess the potential risks and opportunities to achieve BNG based on information known at the time'*. 5.1 also details the requirement for a project to demonstrate a numeric or percentile target commitment to achieving Biodiversity Net Gain at this stage.

With regards to species mitigation, we also disagree that breeding birds have been appropriately considered. Ground nesting birds were identified on site and require bespoke mitigation, for instance skylark plots, which does not appear to be incorporated into the design at this time. As no wintering bird surveys have been undertaken at this time, a precautionary approach to the impacts of the loss of wintering and breeding bird habitat should be taken with regards to development design.

We would also like to see consideration of features such as culvert design to retain open habitats along waterways to be included as a commitment within the EDS.

It is imperative for the impacts to AW, LWS and notable bird species to be clearly outlined in order to provide any confidence that the development proposals will not have significant impacts upon biodiversity at a local to regional level. The requirement for BNG to be demonstrated is clearly highlighted within the NPPF and local policy.

I trust these comments are helpful.

Regards,

Laura Hobbs MCIEEM
Conservation Planning Officer
Yorkshire Wildlife Trust

<http://www.ywt.org.uk>

