

**From:** Martin Baker <Martin.Baker@wildlifebcn.org>  
**Sent:** 17 October 2022 16:34  
**To:** Planning  
**Subject:** 22/02066/FUL - Owlstone Court Re-development  
**Attachments:** 2202066FUL-OwlstoneCroftBNGAssessmentJune2022-WTComments.xlsm

FAO Tom Gray,

Dear Tom,

The Wildlife Trust has been taking an interest in this case because it is adjacent to Paradise LNR, a recognised nature conservation site of county importance (County Wildlife Site). I note that in response to the ecology documents and survey reports submitted by the applicants, an active local residents group has also commissioned their own reviews of the ecology information. The City Council Biodiversity Officer has also commented on the case and there has been responses by the applicant to these detailed comments. I do not propose to add further detailed comments to those already submitted, though I note that it is clear from these conflicting reports that there is doubt regarding the nature, magnitude and significance of the potential ecological impacts, particularly on bat species, invertebrates, and on drainage impacts on the adjacent Paradise LNR.

I would also add that my own review of the Biodiversity Net Gain (BNG) assessment concludes that the potential benefits are over-stated, as the final development will be a residential location with very low prospect of delivering the types of better quality grassland habitats predicted. Taking a more precautionary approach as to the likely quality of on-site habitats post development would reduce the predicted BNG to nearer 10% rather than the 50%+ claimed. I have attached my review of the Defra Biodiversity Metric to support this view.

This development is adjacent to a recognised LNR and County Wildlife Site (CWS) and as such the precautionary principle should be applied when assessing potential impacts and determining whether the planning application is acceptable. There appears to be a residual risk of adverse impacts on Paradise LNR / CWS and some of the species that use it and the surrounding landscape. I also do not believe that the balance of potential net gains as measured by the Defra Biodiversity Metric is sufficient to over-ride the potential impacts on species and the adjacent Paradise LNR. The Wildlife Trust therefore objects to the current application.

Yours sincerely,

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