

From: Terence Garner <TGarner@castlepoint.gov.uk>
Sent: 20 September 2023 11:41
To: Liam Ryder | Code DP
Cc: Stephen Garner
Subject: Issues with Rayleigh road planning application

Hi Liam, I promised a note as to the issues present with your application which we need to address. Below is an outline of the topics that I feel we need to reference to answer some of the issues being raised by the Badger Group and the Essex Wildlife Trust as well as some of the objectors:

- The site is un-allocated for development and allocated for Green Belt purposes on the adopted Local Plan, Para 148 of the NPPF states that LPAs should ensure that substantial weight is given to any harm to the Green Belt. VSC will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm arising from the proposal, is clearly outweighed by other considerations. (Account will of course be taken of lack of housing land And affordable housing provision)
- Part of the site is within the Historic Landscape designation which relates to ancient field patterns, and woodlands the application encroaches in to this area
- Essex Badger Protection Group (EBPG) state surveys are out of date, this area has large number of active setts including one substantial sett in the middle of the site which is proposed, along with others on the site, to be removed/relocated. Development will also remove a very large area of foraging for them, together with other wildlife in the area, including their displacement. Appreciate mitigation works but Badger Group have issues as to whether this is achievable without damaging so many setts (13) forever.
- Provision for nesting birds/ bats inadequate and should adopt the Exeter City Council standard.
- The site also falls within the Hadleigh and Daws Heath Complex Living Landscape, an area identified for its network of wildlife-rich habitats (EWT, 2010). Scheme will detract from the objectives of this.
- Essex Wildlife Group - Little Haven Nature Reserve and Valerie Wells Wood Nature reserve impacts, number of protected species, historic pattern of irregular small fields and ancient woodlands, Pound Wood, Tile Wood and Starvelarks Wood, are significant elements of the woods which are managed as nature reserves, the development of the application site will have a detrimental affect on the Nature reserves by virtue of its very close proximity and increased public activities in the immediate area.
- the Hadleigh and Daws Heath Complex Living Landscape, is an area identified for its network of wildlife-rich habitats (Essex Wildlife Trust, 2010) and is a long term vision for the area, the proposed development would conflict with this vision by developing a large part of the area concerned.
- Essex Wildlife Group are concerned that the percentage of net biodiversity gain shown with the application does not take full account of the total loss of wildlife habitat, including badgers setts, birds other flora and fauna and protected species, including Butterflies and Southern Wood Ants, in addition there will be a significant loss in foraging areas for all species. In addition to the 'Biodiversity Net Gain Design Stage Report', a Biodiversity Gain Plan should be submitted, The Environment Act sets out that the biodiversity gain plan should cover:
 - How all adverse impacts on habitats have been minimised.
 - The pre-development biodiversity value of the onsite habitat.
 - The post-development biodiversity value of the onsite habitat.

- The biodiversity value of any offsite habitat provided in relation to the development.
- Any statutory biodiversity credits purchased.

As you can see these are mostly biodiversity and historic issues, sorry to have to pass this to you so late for a response but when the report starts to come together, quite often issues are raised, I feel we should try to address these before committee members start to consider the matters concerned.

Kind regards,

Terry

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