



**Bedfordshire
Cambridgeshire
Northamptonshire**

RE. : Outline Planning Application No. 14/00094/OUT; for up to 75 dwellings with new access and landscaping; at land off Bury Close, in Cottingham.

OBJECTION.

Thank you very much indeed for consulting The Wildlife Trust concerning the above Outline Planning Application development scheme proposals to construct a new residential area on land off Bury Close in the village of Cottingham.

We refer here now to your Consultation Covering Email message, dated 18/03/14, about this same matter, and also to the set of accompanying documentation that has been submitted in support of it; as listed on your Authority's own website.

Having now had the opportunity to review the relevant documentation, for us, in association with this same Outline Application matter, please now note the following feedback as made on behalf of The Wildlife Trust.

(Please note that the version of the Applicant's own ecologist's report document that we have reviewed here was a black-and-white copy only; as scanned-in and hosted on the Corby Borough Council website.)

With reference to the concluding statement made in Paragraph 4.4, on Page 19 of the document entitled "Ecology Report", dated October 2013, as produced by the consultancy BSG Ecology, in respect of the adjacent Local Wildlife Site (LWS) area known as "The Dale", please note that The Wildlife Trust does not agree at all with the ecologist's dismissal of the potential future impacts upon this designated site area.

Please note that this is our principal reason for registering an OBJECTION position to this particular Outline Application in its current form.

In addition, please now note the other following observations in respect of this proposed development scheme :

- With reference to the content of both Paragraph 3.1 and its associated Table 5 on Page 8 of the BSG Ecology report, please note that the consultants have omitted to include a fifth non-statutory site designation that is also located inside a 1 km radius Zone of Interest out from the centre of this proposed Application Site area; and this is the Potential Wildlife Site (PWS) area No. 1079 which lies at a distance of only 150 metres away (at their closest points) to the 'south' from the edge of this development site itself.
- Furthermore, with reference to this same section of the report, please note that in our opinion the closest distance between the edge of this proposed Application Site and "The Dale" LWS is only about 12 m - which is a bit closer than the 50 m listed in the top right-hand corner cell of Table 5.

- In respect of the whole issue of Bats here, The Wildlife Trust understands that CBC have already received at least one letter of consultee response (dated 21/03/14) from the Northants Bat Group in this regard. Therefore, we, in turn, strongly recommend to your Authority that you pay close attention to any specific reservations and concerns that that particular organisation itself has raised on this occasion, and that you give due weight and consideration to their own recommendations and advice regarding this important European Protected Species issue.
- With reference to the advice given by BSG Ecology themselves in Paragraph 4.15 on Page 20 of their report, in respect of the need to undertake a detailed aerial tree survey for all of the identified trees that are considered to have a Bat roost potential, please note that The Wildlife Trust recommends to CBC that this further survey activity cannot be Reserved to Conditions here. Therefore, this detailed aerial tree survey work for Bats must be carried out, completed and the results submitted to CBC for review and approval, prior to any determination decision being made in respect of 14/00094/OUT.
- With reference to the recommendations, for the retention, protection, enhancement and mitigation of biodiversity aspects, as made by the Applicant's own ecologists throughout the relevant portions of both Section 4 and Section 5 of their report document - for example, in Paragraphs 4.7 and 4.8, on Page 19, in Paragraphs 4.9 and 4.16, on Page 20, in Paragraphs 4.17 to 4.19 inclusive, on Page 21, in the "Nesting Birds" section, on Page 21, and also in Paragraphs 4.31 and 4.32, on Page 22 - The Wildlife Trust recommends to CBC, in turn, that you make all of these items the subject of suitably-worded, strong, Planning Conditions.
- Furthermore, we also recommend that CBC should Condition another separate item requiring the Applicant to produce and implement an Ecological Management Plan (EMP) document in favour of the un-developed areas of this proposed Applicant Site and its environs.
- We are disappointed to note that, apparently, this particular Planning Application makes no reference to the Northants county Biodiversity Action Plan, the reference resource of the various county Flora listings, and nor does it seem to have included any consideration of a front-loaded, integrated, Green Infrastructure (GI) approach here either.
- Please note that the footprint for this proposed Application Site lies wholly inside a major, strategic, Sub-Regional GI Corridor route.

Many Thanks & all the best,

Alan Smith
Planning and Biodiversity Officer