

Please find attached an independent ecology representation prepared by **Ethos Environmental Planning** in connection with the above application. I would be grateful if this could be added to the public file and given full consideration as part of the Council's review.

The representation identifies **serious deficiencies** within the applicant's *Ecological Impact Assessment (EclA)* and *Biodiversity Net Gain (BNG)* metric. Each of the issues raised within the representation represents a substantive reason for refusal in its own right.

In summary:

- The on-site **Lowland Mixed Deciduous Woodland**, a ***Priority Habitat of County-level importance***, has been misclassified as of only "site value." This error alone invalidates both the ecological impact assessment and the BNG calculations.
- There has been **extensive clearance of woodland and associated habitat** since the site's purchase, resulting in the loss of habitat for protected species including bats, great crested newts, dormice, reptiles. Figure 1 within the representation extracted below shows the aerial imagery of the site from 2023 which shows the site is extensively covered in woodland with smaller areas of grassland in the north and east. This is also shown in the submitted EclA (Image 1). This is compared to an image taken in October 2025 (left hand image) which shows there has been extensive clearance of woodland habitat on site, with clear evidence of tracks from machinery and bare ground.
- The submitted information fails to demonstrate how ecological harm would be avoided, mitigated, or compensated, or how the statutory 10% BNG requirement would be achieved.

As set out in the Ethos report, the ecological harm from this proposal is substantial and unavoidable. It cannot be justified by any claimed economic or operational benefits. The misclassification of a Priority Habitat, combined with the absence of credible survey evidence and post-clearance baseline manipulation, represents a **fatal flaw in the application**.

In accordance with **NPPF paragraphs 187–193** and **Core Policy 50**, planning permission must therefore be refused, as the proposals fail to demonstrate that significant ecological harm can be avoided, mitigated, or compensated.



Kind regards

Andrew Scott