

From: Haidrun Breith <haidrunbreith@bbowt.org.uk>

Sent: 12 December 2018 17:08

To: Turner, David; wahhall@gmail.com

Subject: Scrutiny committee_SODC Local Plan - Land of Bayswater Brook allocation

Dear Mr Turner and Mr Wahhall,

It has been brought to our attention that the scrutiny committee is going to discuss the inclusion of the Land North of Bayswater Brook in the Local Plan allocations tomorrow. We are surprised and extremely worried to hear that this is being proposed:

- The Council's own Sustainability Appraisal provided as part of the LP consultations in 2017 dismissed both Wick Farm and Elsfield allocations (now combined into one larger 'Land North of Bayswater Brook' allocation) on the basis that they are both in the Greenbelt, and they could cause significant adverse effects on biodiversity. It is unclear how and why this position has changed as no additional evidence has been made available and this site allocation is still against policy.
- The proposed allocations site directly adjoins the nationally important site of Sidlings Copse SSSI (Sites of Special Scientific Interest) and we believe that development of this scale (potentially even larger in the future) will significantly impact on the nature conservation interest and condition of the SSSI, especially in combination with the adjacent Barton development currently under construction.

Part of Sidlings Copse & College Pond SSSI is under BBOWT ownership, and a large proportion of the rest of the site is managed by BBOWT as a nature reserve through agreement with the landowners. We are extremely concerned that development of this scale immediately adjacent to the SSSI will lead to an increase in recreational pressure to the detriment of the site's condition.

The SSSI is a fragile site comprising very rare habitats of alkaline fen, lowland acid grassland, lowland calcareous grassland, heathland, mire, and deciduous woodland, which suffer under increased pressure from visitors. Of particular concerns are an increase in visitors allowing dogs off the leash, dog fouling, dogs worrying livestock, vandalism and an increased risk of 'anti-social' behaviour, all of which we are already experiencing at the site. BBOWT use grazing animals to manage the SSSI, which is essential to maintain these important habitats, however, there is a real risk that indirect recreational pressure might make the management of this site untenable over time, resulting in the decline of the site. In addition, there are other indirect impacts such as impacts on hydrology, air pollution and nutrient deposition (eg from car emissions) to consider, all of which adversely affect these fragile habitats and associated species. There are also other important designated sites, habitats and species in the vicinity which too might be indirectly affected by development on this site.

- National policy and best practice guidance require developments to deliver a net gain in biodiversity. We note that policy Strat15 aims to achieve such a net gain but as managers of the adjacent SSSI (and other designated sites) we do not believe that it will be possible to adequately mitigate and compensate for the impact on the rare habitats and species at Sidlings Copse - no amount of apparent 'Net Gain' in a new development will make up for the loss of biodiversity in an ancient site like Sidlings Copse. We therefore consider it important that the mitigation hierarchy of avoidance, mitigation and compensation (as required by policy) is followed and that impacts are avoided in the first place by choosing sites that will result in least ecological impacts.

BBOWT believes that this site allocation, especially in combination with the ongoing development at Barton, will have significant effects on biodiversity, and we therefore ask you not to include this site in the LP allocations. If additional housing capacity is indeed needed there are ecologically far less sensitive sites that should be considered first such as Land off Grenoble Road.

Please don't hesitate to get in touch if you have any questions.

Kind regards,

Haidrun

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