Carl Stott

From: Sent: To: Cc: Subject: Rupert Simms <Rupert.Simms@charnwood.gov.uk> 21 December 2021 17:49 Mark Pickrell development.control@charnwood.gov.uk RE: P/20/2199/2 - Leconfield Road, Nanpantan

From: Rupert Simms
Sent: 21 December 2021 17:48
To: Rupert Simms <Rupert.Simms@charnwood.gov.uk>
Cc: development.control@charnwood.gov.uk
Subject: RE: P/20/2199/2 - Leconfield Road, Nanpantan

Mark

Apologies for the delay in responding to this. I reviewed the resubmitted BIA. I'm not convinced that the "poor" condition assessment for "tall ruderal vegetation" is justifiable. However the point made about the baseline assessment in the last correspondence has been addressed. It is not clear what the exact impact of a detailed design would show. However the development proposal is now represented in a way that gives a clear indication of the scale of loss. Therefore I would recommend that, if the recommendation is to approve the proposal that we seek to agree conditions and a S106 agreement to secure on site mitigation and offsite compensation as necessary.

Rupert

From: Rupert Simms Sent: 13 December 2021 10:53 To: Mark Pickrell <<u>Mark.Pickrell@charnwood.gov.uk</u>> Cc: <u>development.control@charnwood.gov.uk</u> Subject: RE: P/20/2199/2 - Leconfield Road, Nanpantan

Mark

Thanks for this. I have attached my version of the calculation. However I think it is important that the applicant's ecologist addresses this themselves for 3 reasons. Firstly; as you will see from my previous email to Ann (below) there is a discrepancy between the areas of habitat lost and habitat created. You will see that this shows up as an error message on the attached spreadsheet but it has not been explained. The only way I can do this is by reducing the area of habitat created, which of course increases the size of the loss (see attached). Secondly; In order to remove doubt and uncertainty about the origin of the calculations, they must come from the applicant. Thirdly; I am having to invest a good deal of time and energy in addressing substandard assessments and "errors" which invariably favour developers. In at least one recent case this was accepted by DM and plans committee, resulting in a significant on site loss being permitted without compensation. We need to be communicating clearly to applicants that the information they submit should be based on objective assessments. Anything we can do to ensure that ecological assessments are of an adequate standard at the point of first submission will in the long run save time for us, the applicant and result in better outcomes for biodiversity

Rather than send the recalculation I think it would be more appropriate were the applicant sent a list of corrections (as set out below) together with a request to address the discrepancy in measurement. Having reviewed the calculation prior to sending to you this morning I would add the following to the list of corrections 6) Habitats created- time to condition for areas of dense scrub increased from 5-15years

Thankyou Rupert