

## Comments

### Site Specific Part 2 Local Plan - Main Modifications Consultation (19/03/21 to 30/04/21)

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Please use a separate form for each representation.

#### Which Main Modification, change to the Policies Map or section of the Sustainability Appraisal Report Addendum or Habitat Regulations Assessment Addendum does your comment relate to?

MM38: Policy KET10 and supporting text, pages 82 and 83.

Please use a separate form for each representation.

#### Representation

Amendments to Policy KET10 indicate that the loss of 1.07ha of grassland allocated for housing development at Wicksteed Park will be compensated for by the provision of 4.4ha of land south of the parkland. The use of the word 'compensated' indicates a like-for-like replacement, however the grassland allocated for housing development is of a different character to the 4.4ha site and is a fundamentally different habitat. The 4.4ha land south east of the park is marshy wetland prone to severe annual flooding, and not a well-drained grassland. The vegetation structure of the two sites is also markedly different. For example, the 1.1ha site is cut annually and left semi-wild which facilitates the growth of flowering plants that benefit pollinator species, however nectar availability at the 4.4ha site is nil and foodplants for immature stages of butterfly life-cycles (larvae) are also absent. Biodiversity is much greater at the 1.1ha site as its longer swards and matrix of grass species invites birds of prey such as kestrel to frequent the site in search for small mammals which have not been sighted at the 4.4ha site. The 1.1ha site can support overwintering and nesting birds, a range of invertebrate species and mammals year-round, whereas the 4.4ha is limited to warmer months and those of lower flood risk. The 4.4ha site is therefore not suitable to be considered as mitigation for the loss of the 1.1ha grassland which is a valuable local site for pollinator species within the core parkland akin to the hay meadow to the north east. The loss of this site would result in further habitat fragmentation which is detrimental to pollinator species such as bees, butterflies and moths. Both the Policy and Criterion should be amended to consider the net loss of utilisable habitat (despite the increase in ha). The lack of protection afforded to the at-risk 1.1ha site must be altered in order for it to be appropriately and rightfully respected in the case of a planning application (which indicates the development of 30-35 dwellings) threatening its loss being submitted to the council. Local species must be safeguarded from loss, and the mitigation presented through the Main Modifications to Policy KET10 does not adequately respect this valuable local green space. Amendments should be made to prompt thorough monitoring and surveying of the 1.1ha and 4.4ha sites for their respective species diversity and hydrology by experts from local conservation organisations prior to any mitigation plan being proposed (and prior to a planning

application being considered), which will allow the differing habitat characteristics of the two sites to be better identified and alterations made to Criterion K accordingly.

**Do you wish to be notified?**

When the Inspector's Report is published?