

Benjamin Bailey

Subject: PLAN/2019/1177 Land South Of Hoe Valley School -East Egley Road
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From: Heather Lewis
Sent: 14 February 2020 11:52
To: Benjamin Bailey
Subject: PLAN/2019/1177 Land South Of Hoe Valley School -East Egley Road

Dear Mr. Bailey,

PLAN/2019/1177

**Redevelopment of site following demolition of existing building to provide health club building (Class D2) also incorporating external swimming pool, spa garden, terrace and tennis courts (including tennis court airdomes), provision of 36 dwelling houses (Class C3) up to a maximum of 3 storeys in height, vehicle parking, hard and soft landscaping, ancillary works including ancillary structures and fencing/gates and new vehicular access from existing road serving Hoe Valley School (Environmental Statement submitted)
Land South Of Hoe Valley School And East Of Railway Tracks Egley Road Woking Surrey GU22 0NH**

Thank you for consulting the Surrey Wildlife Trust within regards to the above referenced planning application. Having reviewed the documentation submitted and consulted our records, we have the following comments and recommendations;

I note that the following ecological documents have been submitted in support of the above referenced application; 'Environmental Statement Chapter 7; Ecology' and supporting survey information submitted in 'Technical Appendix Ecology', Trium Environmental Consulting LLP, dated November 2019; Plan titled 'External Site Plan External Lighting Plan', author Elm Building Services Engineers Ltd, dated 10 Jan 2020, drawing ref N0039/E/200 Rev A; Plan titled 'Landscape Masterplan', author ARC Landscape Design and Planning Ltd, dated 22nd November 2019, drawing no. A241-ER-LA01; and 'Arboricultural Impact Assessment. Dated author Ecology Consultancy, dated 20 November 2019.

Demonstrate a net gain in biodiversity

The development as proposed will result in the felling of a substantial number of trees, at least One quarter of the total area of woodland currently present on site. The development is also proposed to immediately abut retained woodland with little or no semi-natural buffer to the woodland. Built development in such close proximity to the woodland is expected to result in further deterioration of retained woodland. The development as proposed is therefore expected to result in direct loss and deterioration of the deciduous woodland present on site.

This woodland habitat is identified by Natural England as deciduous Woodland of Principal Importance for the purpose of conserving biodiversity in England, in line with the provisions of Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006.

Section 40 of the NERC Act puts a duty on the Council to conserve biodiversity during the planning function, and clarifies 'conserving biodiversity' to mean 'restoring a habitat'.

The developer does not present information relating to how this loss and deterioration will be avoided or mitigated for within the design of the development. **The loss of woodland habitat as proposed, would therefore be contrary to the statutory objectives of the NERC Act.**

Above referenced landscaping plan submitted in support of this application presents very limited opportunities for planting and does not convincingly provide adequate mitigation for the larger woodland blocks to be lost to development. Technical survey reports submitted within the Technical Appendix of the Environmental Statement makes a series of recommendations for impact avoidance, mitigation and compensation measures with regards to a

suite of protected species including bats, reptiles and breeding birds. These recommendations are not translated within the Landscaping Masterplan submitted. **It is therefore not feasible to conclude that the proposed development will ensure protected species are appropriately protected in line with statutory obligations.**

The National Planning Policy Framework (NPPF) makes it clear (para 170) that “Planning policies and decisions should contribute to and enhance the natural and local environment by; minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures”.

Paragraph 174 requires the promotion of “the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measureable net gains for biodiversity”.

The application as submitted does not provide sufficient appropriate ecological information to ensure that the proposed development will result in a net gain for biodiversity. As proposed the development appears to result in a net loss of protected Habitat of Principle Importance deciduous woodland and a suite of legally protected species.

Granting planning permission for this development as proposed on the basis of currently available information is contrary to the policy objectives of the NPPF and the statutory obligations of the NERC Act and a suite of European and national protected species legislation.

I strongly recommend that the applicant and their ecologist apply the DEFRA Net Gain metric to establish a current baseline figure for biodiversity value of the site and use this to identify appropriate impact avoidance and mitigation measures in order to demonstrate that the development will result in a net gain for protected habitats and species. Quantified evidence that a net gain in biodiversity is secured as a result of development should be submitted to the Council in writing for approval prior to the determination of the current application.

I also advise that the above referenced External Site Plan External Lighting Plan does not have appropriate regards to best practice guidance for avoidance of adverse impacts on European Protected nocturnal species.

We look forward to receiving further formal consultation requests from Woking Borough Council following submission by the applicant of the above referenced supporting information.

Regards,

**Heather Lewis BSc (Hons), MSc
Conservation Manager, Planning.**

Tel; 01483 795472

I work part time hours Monday to Friday 9am to 3pm.



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