

College Lake
Upper Icknield Way
Bulbourne
Tring
HP23 5QG

FAO David Buckley
Milton Keynes Council
[by e-mail]

22nd August 2019

Dear David,

19/01818/OUT Outline application including access for the development of the site for employment uses, comprising of warehousing and distribution (Use Class B8) floorspace (including mezzanine floors) with ancillary B1a office space, general industrial (Use Class B2) floorspace (including mezzanine floors) with ancillary B1a office space, a small standalone office (Use Class B1) and small café (Use Class A3) to serve the development; car and HGV parking areas, with earthworks, drainage and attenuation features and other associated infrastructure, a new primary access off Brickhill Street, alterations to Brickhill Street and provision of Grid Road reserve to Brickhill Street with appearance, landscaping, layout and scale to be determined as reserved matters. | Land At Brickhill Street South Caldecotte Milton Keynes MK17 9FE

I am writing to respond to the above application. I have the following comments on behalf of the Berks, Bucks and Oxon Wildlife Trust. As a wildlife conservation focused organisation, our comments refer specifically to impacts on species and their habitats which may occur as a result of the proposed development. We comment on as many relevant issues as our resources allow, and the absence of a comment on an issue should not be taken as our approval.

BBOWT **objects** to this application on the following grounds:

- 1. Loss of priority habitat including lowland meadow, traditional orchard and hedgerows contrary to Policy NE2**
- 2. The application does not demonstrate a measurable net gain in biodiversity as required by the NPPF and local plan policy NE3.**
- 3. The application has failed to enhance the structure and function of ecological networks, a further breach of policy NE3, and also contrary to policy NE4 Green Infrastructure. There is a loss of part of a MK Wildlife Corridor.**
- 4. Uncompensated loss of breeding bird habitat including Red List and Priority Species: Sky Lark, Song Thrush, Yellowhammer, Skylark and possibly Yellow Wagtail.**
- 5. We agree with the decision of the Council's ecologist that an EIA is required**

The potential negative impacts of this large development for biodiversity are significant. They include the urbanisation of a large greenfield area with several habitats including lowland meadow priority habitat, traditional orchard priority habitat and hedgerow priority habitat. The lowland meadow habitat seems to show medieval ridge and furrow plough lines (Bing Maps imagery), which

would indicate that it is relatively undisturbed meadow of greater ecological importance, and possible historical interest.

The Ecology Report reprises the National Planning Policy Framework requirements for measureable net gains in biodiversity, but they are not addressed by the plans. The baseline, as far as can be determined from the Ecology Report, shows that there are significant habitats at the outset of this application. An appropriate baseline should be provided by a biodiversity metric, such as the defra system. Habitat protection and creation in this proposal are minimal, and limited to the margins of this large site. As it stands, this application represents a substantial net loss to biodiversity, contrary to PlanMK Policy NE3 and NPPF 170.

The site is adjacent to a Local Wildlife Site (LWS), Caldecotte Lake. LWSs make key contributions to ecological networks and Green (and Blue) infrastructure, and provision should be made to support that on this proposed development as required by policies NE3 and NE4. This role of LWSs is further emphasized in the recently updated government guidance on the implementation of [Biodiversity Net Gain and local ecological networks](#).

The site includes part of the Ouzel Biodiversity Opportunity Area (BOA) within the site, and the Greensand Ridge BOA should also be recognised by any proposal to develop this site. The lack of new habitat creation to address this, which should be part of a management plan, is contrary to policy NE3. The Council has addressed the issue of management plan duration through its support for the Natural Environment Partnership's (September 2016) "Vision and Principles for the Improvement of Green Infrastructure in Buckinghamshire and Milton Keynes" which includes Principle 5 'Green infrastructure is managed in the long term'. The management plan should comply with Principle 5, and so we recommend that it is specified and funded for 25-30 years during which time a longer period should be arranged.

We note that a large area of the proposal is given over to bare metal rooves, which could be green rooves or a combination of solar panels and green rooves.

In our opinion, this application falls substantially short of several biodiversity policy requirements and should not go ahead. To meet those requirements a major revision of the proposal would be needed, including: an EIA, biodiversity metric assessment, onsite habitat preservation and creation, and a management plan.

Yours sincerely,

Fiona Hewer

Senior Biodiversity and Planning Officer (Buckinghamshire)

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