Objection to Planning Application DM/25/2661

Executive Summary

I object to planning application DM/25/2661 on the grounds that it presents unresolved and fundamental risks to irreplaceable woodland habitats, relies on inconsistent or incomplete ecological evidence, and fails to demonstrate that key environmental constraints can be managed safely or lawfully. These issues go directly to the acceptability of the proposal in principle and cannot be deferred to later stages.

Planning decisions must be made on a reliable and coherent evidence base. In this case, the documentation does not provide the clarity, certainty or internal consistency required to demonstrate that long-term harm to highly sensitive habitats can be avoided. On this basis, refusal is both justified and the most defensible option available to the Local Planning Authority.

1. My Interest in the Application

I own a three-acre woodland immediately adjoining the eastern boundary of the proposed development. My ownership can be verified from my submitted contact details. The woodland forms part of a wider ancient woodland network and is ecologically sensitive. The development has potential to affect its condition, character and long-term ecological resilience. I therefore have a substantial and legitimate interest in ensuring the assessment is robust, accurate and compliant with planning policy.

2. Major Issue 1 – Irreplaceable Habitat (Ancient Woodland) at Risk

Ancient woodland and other irreplaceable habitats receive the highest level of protection in national planning policy. NPPF 180(c) states that development resulting in deterioration of such habitats should be refused unless wholly exceptional circumstances apply. None apply here.

Conflicting points within the submission raise serious concerns:

• The Landscape Masterplan promotes woodland-edge recreation and ‘woodland play’.

• Green corridors direct residents towards sensitive woodland interfaces.

• No visitor-pressure assessment or long-term management evidence has been provided, despite well-known risks of unmanaged footfall to woodland edges.

• No evidence demonstrates that fencing or ‘thorny edges’ will remain effective over decades.

The combination of increased population, multiple desire lines, and the layout shown makes long-term recreational pressure foreseeable. In such circumstances, the LPA must be confident that deterioration can be avoided. As submitted, this cannot be established.

Deterioration includes edge erosion, compaction, unmanaged incursions and light spill—not only direct land-take. These matters go to the heart of acceptability and cannot be deferred.

Conclusion: The proposal conflicts with NPPF 180(c) and DP38. This alone provides strong and defensible grounds for refusal.

3. Major Issue 2 – Insufficient Evidence Concerning Protected Species

The protected species evidence base contains significant gaps and uncertainties:

• Access to Great Crested Newt ponds has been refused repeatedly since 2017, yet assessments assume unchanged conditions.

• Barbastelle and Myotis bat sensitivities are acknowledged, but no lux contour modelling has been undertaken.

• Reptile mitigation depends on future habitat creation not yet designed, located or secured.

BS42020 requires up-to-date and proportionate evidence at decision stage, particularly where risks are significant. That threshold is not met here.

Conclusion: The LPA does not yet have sufficient information to reach a reasoned judgment on protected species impacts. This is a recognised basis for refusal.

4. Major Issue 3 – Contradictions Across Ecological Documents

Key documents contain inconsistencies that undermine confidence in the ecological conclusions:

• Statements of high bat sensitivity contrast with the absence of lighting contour modelling.

• The EcIA claims ‘no residual recreational effect’, yet the landscape proposals encourage woodland-edge access.

• Reptile impacts are initially assessed as negative but later presented as minor positive without secured mitigation.

A coherent evidence base is essential for a lawful decision. These contradictions materially affect conclusions and cannot be dismissed as normal outline-stage variation.

Conclusion: The inconsistencies mean the evidence base is not sufficiently reliable to support approval.

5. Major Issue 4 – Recreational Pressure Is Foreseeable and Under-Assessed

Separate from the policy protections for ancient woodland set out above, the development also gives rise to direct and foreseeable recreational pressures which represent a significant impact in their own

right. The EcIA relies heavily on fencing and planting to prevent woodland encroachment, while the masterplan itself encourages movement towards the woodland edge.

Experience from comparable developments shows:

• perimeter fencing is regularly breached or removed,

• informal paths form quickly,

• planted barriers degrade without intensive long-term management.

Recreational pressure is:

• long-term,

• cumulative,

• and potentially irreversible.

These impacts relate to the principle of development and must be assessed now—not deferred.

Conclusion: The proposal underestimates recreational pressure, presenting credible long-term risks to sensitive habitats.

6. Major Issue 5 – Biodiversity Net Gain Proposals Rely on Unsecured Assumptions

The applicant presents a precise +18% net gain for both habitat units and hedgerow units. This apparent precision is misleading.

The DEFRA Metric:

• is not a statistical model,

• provides no confidence intervals,

• does not quantify uncertainty,

• and is highly sensitive to behavioural and management assumptions.

The identical +18% headline figures are themselves improbable and indicate that the outputs reflect modelling choices rather than demonstrable ecological gains.

BNG feasibility is not BNG deliverability. Without secured 30-year management plans and enforceable habitat creation, the figures must be afforded limited weight.

Conclusion: Claimed BNG is illustrative only and cannot be relied upon to demonstrate compliance with policy.

7. Major Issue 6 – Drainage and SuDS Considerations Remain Unresolved

The drainage strategy leaves several fundamental matters unresolved:

- No infiltration testing has been undertaken to demonstrate that sustainable drainage features are feasible in principle on the site.
- There is no modelling of how proposed attenuation basins, swales or below-ground pipe networks may alter hydrology within adjacent woodland soils.
- No assessment has been provided of how changes to surface-water flow paths may affect soil-moisture regimes along the woodland edge—an issue directly relevant to ancient-woodland resilience.
- Exceedance routes have not been identified, and no evidence demonstrates that they can be directed away from sensitive habitats.
- The relationship between drainage infrastructure and root protection areas has not been assessed, creating uncertainty over the impact on mature woodland trees.

Given the sensitivity of woodland soils and water regimes, the LPA must be confident that the scheme can be engineered without risk of adverse hydrological change. Without infiltration data, woodland-edge hydrological modelling, or clarity on SuDS feasibility, that confidence is not achievable at outline stage.

Conclusion: Drainage uncertainties remain material and unresolved, representing a further constraint to development at this stage. This alone provides strong and defensible grounds for refusal.

Conclusion

The proposal relies on inconsistent, incomplete or untested ecological information, and on mitigation measures that are speculative or reliant on future design stages. These issues are fundamental and must be resolved before permission is granted.

The development as submitted fails to demonstrate compliance with key national and local policies relating to ancient woodland, biodiversity, drainage and environmental protection. Refusal is therefore the most appropriate, robust and defensible outcome for the Local Planning Authority.

[redacted]

(Adjoining landowner)