

## **Councillor Briefing Note – Planning Application DM/25/2661 (Coombe Farm)**

### **Summary of Key Concerns and Reasons Why Refusal Is Appropriate**

This note highlights the main problems with the Coombe Farm application in a clear and concise form. It explains why refusal would be reasonable, proportionate, and well-supported by policy.

A more detailed technical submission has been provided to the case officer, which sets out the full evidence base and policy analysis behind each of the issues summarised here.

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### **1. Impact on Irreplaceable Ancient Woodland – Strong Policy Grounds for Refusal**

The National Planning Policy Framework (NPPF 180(c)) gives the highest level of protection to ancient woodland. Planning permission should be refused for development that risks deterioration unless wholly exceptional circumstances exist. None exist here.

#### **Key concerns:**

- The site directly adjoins ancient woodland.
- The layout draws residents toward the woodland edge.
- Recreational pressure (dogs, informal paths, trampling) is foreseeable.
- No visitor-pressure modelling or long-term management plan has been provided.
- Planting and fencing cannot reliably prevent long-term intrusion.

#### **Why this matters:**

Ancient woodland loss or deterioration is a *red-line issue* in national policy. Refusal on this basis is highly defensible and often upheld at appeal.

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### **2. Insufficient Information on Protected Species**

Several protected species may be present, yet critical surveys are missing.

#### **Key points:**

- Great Crested Newt surveys are out of date because access to ponds was denied.
- Bats (including Barbastelle and Myotis) may be affected, yet no lighting impact modelling has been done.
- Reptile mitigation relies on habitat not yet designed or secured.

#### **Why this matters:**

When evidence is incomplete, decision-makers are required to take a precautionary approach. Refusal is justified because sufficient information is not available.



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### 3. Contradictions Within the Ecological Reports

The developer's own documents contradict each other in key areas

- High bat sensitivity stated in one report is not reflected in lighting design.
- The Ecological Impact Assessment claims “no residual recreational impact”, but the landscape plan encourages woodland-edge use.
- Reptile impacts are assessed as negative in one place and positive in another.

#### **Why this matters:**

A planning decision must rely on coherent, fit-for-purpose evidence. Contradictions undermine confidence in the ecological assessment to the extent that it is insufficiently reliable to justify approval.

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### 4. Recreational Pressure on Woodland Will Increase Significantly

Even aside from ancient-woodland policy, this is a significant impact.

- Residents will naturally gravitate to the woodland edge.
- Fencing and thorny planting rarely prevent informal paths.
- Woodland-edge deterioration is well documented in comparable developments.

#### **Why this matters:**

This is a practical, foreseeable long-term ecological risk that cannot be mitigated reliably.

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### 5. Biodiversity Net Gain (BNG) Claims Are Not Reliable

The developer claims a precise **+18% net gain**. However:

- The BNG metric is not a statistical model and gives no indication of forecast uncertainty.
- Delivery depends heavily on private gardens and long-term management that cannot be guaranteed.
- Habitat and hedgerow units both showing the identical +18% is improbable and suggests the modelling is driven by overly simple assumptions.
- No 30-year management plan has been supplied.

#### **Why this matters:**

BNG must be deliverable, not theoretical. These figures should be given little weight at outline stage.

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## 6. Drainage and SuDS Uncertainties Create Unacceptable Risk

Major gaps remain:

- No infiltration testing.
- No modelling of how drainage basins or pipes will impact on woodland soils.
- No identification of exceedance routes.
- No assessment of SuDS infrastructure within root-protection areas.

### Why this matters:

If SuDS cannot be safely delivered, the layout may not be viable. This is a common and accepted reason for refusal at outline stage.

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## Overall Assessment

The application has multiple fundamental constraints:

- National policy on ancient woodland
- Incomplete protected-species surveys
- Unreliable ecological conclusions
- Unmodelled recreational impacts
- Uncertain BNG delivery
- Unresolved drainage risks

These are not small details that conditions can fix; they go to the heart of whether the site is suitable for development at all.

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## Conclusion – Why Refusal Is Appropriate

Refusal would be:

- Policy compliant
- Supported by national guidance
- Aligned with precautionary principles
- Defensible at appeal
- Based on clear evidence gaps and ecological risk

  
(Adjoining landowner)