

From: Levine, Cody
Sent: 10 December 2021 10:50
To: Aldridge, Steven
Subject: RE: Lea Castle - Biodiversity Net Gain

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Steve

Apologies for the oversight. I have now reviewed the metric and have very limited comments:

1. Under strategic significance criterion, as the whole site is located within a 'B-Line Corridor', as identified in Worcestershire's [Biodiversity Action Plan](#) (2018-2027), I believe the correct selection is more likely to be 'within area formally identified in local strategy'. However, as the strategic significance multiplier would then apply equally to habitats lost to development as it would habitats recreated on restoration, I don't believe this will make a significant difference to the final BNG tally, and a further iteration of the BNG metric should therefore be appended to a conditioned LEMP, so as to reflect this refinement and to inform a baseline for future habitat monitoring efforts.
2. Secondly, a number of proposed habitats have been identified with 'high' or 'very high' difficulty for creation, with a time to target condition of 30 and 32years+, respectively. This will exceed the typical timespan of usual LEMP periods secured by mineral consent (usually an aftercare period of 5 years, unless otherwise agreed between the applicant and CPA). It is therefore requested that the applicant confirms they are amenable to offering an aftercare period aligning with the proposed habitat creation target timescale (30years, which would also be in line with Environment Act (2021) Clause 100(b) as relates to securing biodiversity net gain). Alternatively, it is requested the applicant confirms they are prepared to secure within the proposed LEMP a funded commitment to an aftercare period which is capable of achieving the proposed habitat condition to target timescales, so as to provide the authority with confidence the purported habitat gain specification can be delivered as proposed. If no commitment to deliver the biodiversity net gain specification proposed can be secured, then I would recommend the metric is reiterated and resubmitted so as to demonstrate what biodiversity gain will realistically be secured during an agreeable period of aftercare, should the scheme gain consent.
3. Finally, we have requested GIS shapefiles of the proposed BNG audits, so as to be able to maintain an auditable and spatial account of biodiversity net gain in the county, and to update the Worcestershire Habitat Inventory in due course so as to reflect the habitat gain proposed. It would be appreciated if these could be shared, however it would be satisfactory if these were attached to a LEMP in due course if the applicant is amenable.

I hope the information is of some help

Kind regards

Cody.

From: Aldridge, Steven <SAldridge@worcestershire.gov.uk>
Sent: 08 December 2021 11:29
To: Levine, Cody <CLevine@worcestershire.gov.uk>
Subject: Lea Castle - Biodiversity Net Gain

Hi Cody,

In your comments attached for Lea Castle Farm Quarry you stated:

Biodiversity Net Gain

With regard to Biodiversity Net Gain, the County Ecologist welcomes the headline figures but re-iterates his previous comments that he requires submission of the DEFRA metric spreadsheet in order to review and comment on the evidence itself.

I don't appear to have received any further comments from you on this matter, since the applicant provided the requested metric (see email attached), likely because the focus has been on the potential ancient woodland. Are you able to confirm if this matter has been closed off?

Thanks

Steve

Steven Aldridge

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