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Cc: [Allison Tinsley](#)
Subject: [EXTERNAL]Re: [External] - Further Information (Regulation 25) - Land at Lea Castle Farm, Kidderminster, Worcestershire - Ref: 19/000053/CM
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Dear Steve,

Thank you for inviting the Herefordshire and Worcestershire Earth Heritage Trust (H&WEHT) to comment on this further information.

It is very disappointing to see that our previous comments appear not to have been addressed in this further Information.

Policy requires developers to "protect, conserve and enhance geodiversity" and "where loss is unavoidable, record and advance understanding of the significance of any geodiversity feature(s) to be lost (wholly or in part) in a manner proportionate to their importance and the impact of the loss, and make evidence and any archive generated publicly accessible."

I note that the new "Habitat Regulations Assessment" refers to the important geology of the Severn Estuary, although it is very remote from this site, but it ignores completely the destruction of parts of the internationally important Severn Valley River Terrace formation that is inherent in this proposal.

We therefore request that the applicant states how they propose to "record and advance understanding of the significance" of the geodiversity that will be lost as a direct result of the proposed development, and "make evidence and any archive generated publicly accessible."

H&WEHT have made constructive and proportionate proposals in previous comments, but these appear to have been ignored by the applicant.

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Trustee

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