Tendring Colchester Borders Garden Community EIP

Response to the Inspector's Questions
From Cllr. William Sunnucks

19 April 2024

Main matter 3 – Nature

Does the Policy provide a clear direction as to how a decision maker should react to a development proposal?

Biodiversity net gain:

To provide clarity for both the decision maker and applicant it would be helpful for the evidence base to include a provisional BNG assessment, prepared in line with the latest DEFRA metric, and consistent with the requirements of the DPD.

Despite generous allocations to green and blue infrastructure, the scheme may struggle to deliver 10% BNG due because:

- The Salary Brook country park will be on the attractive slopes to the Brook which already has high biodiversity value: so BNG points will be lost when it is open to the public – a key promise in the DPD. There is conflict between the use of Salary Brook as a Nature Reserve and as a Country Park and the DPD shouldn't claim the benefits of both.
- Much of the remainder of the site will put farmland and hedgerows under concrete and I would expect a net BNG loss there too.

I understand that the initial BNG assessment fell short of 110% and that the methodology was changed for a second one which complied. Such re-interpretations of the DEFRA metric should be clearly laid out and justified.

William Sunnucks
Colchester City Councillor
Shadow Portfolio Holder for Resources