



## **Charing Parish Council Interim Comments on and Objections to Proposals for Land South of the Swan, Application 20/00508/AS**

This note contains interim comments from Charing Parish Council on this application. We reserve the right to add to or amend our comments in due course once we have been able to consult and gather more views from residents.

This is a complex application. It is the largest development Charing is facing, possibly the largest it has ever faced. It is important that residents are able to understand it and to have time to assess it and that the Parish Council has time to consult residents. This is clearly difficult in current circumstances. It has not been possible for the developer to hold an exhibition. The two key staff members of Countryside have been on furlough for much of the time since the application was lodged so that some of our questions have not been answered. We therefore request an extension of a minimum four weeks to the normal time for consultations, i.e. to at least June 18<sup>th</sup>, to mitigate some of these issues.

Nevertheless, the Parish Council, assisted by a small team of residents with relevant specific knowledge, has been able to put together this interim assessment. We also had the benefit, prior to the application being lodged, of two meetings with Countryside Properties, DHA and their drainage and ecological advisers which were very helpful. We therefore feel able to give a general indication of our views.

Countryside and their team should have credit for the work done on drainage, preserving the ditches and hedgerows, and recognising the ecological potential of the area. However we have the following objections which are explained in detail below:

- The absence of a sufficient “green border” with Poppyfields;
- The absence of provision to construct the section of the Charing/Charing Heath Greenway that passes through/adjacent to the site;
- Inadequate provision to ensure that the main access to the site can in future be from the adjoining S28 site (Land to the rear of Northdowns Garage) to avoid the danger of having two junctions with the A20 close together;
- The absence of additional tree planting along the north of the site and some careful reinforcement along the ditches to protect views from the AONB;
- The absence of any evidence concerning the future undertaker for drains and sewers in the site (be that Southern Water or a regulated body such as ICOSA) and consequently the lack of evidence that the future undertaker has approved the plans and will monitor the installation;
- The fact that the plans show foul water draining into an inadequate sewer with known problems affecting, among other places, Charing Surgery. While this is the responsibility of Southern Water, we believe it would be irresponsible to give planning permission until Southern Water have proposed a plan for dealing with the inadequacies of sewers in this area and an appropriate timetable for this to be carried out;

- We do not consider parking provision to be adequate;
- The lack of sufficient variety in house design;
- The concentration of affordable housing on the Eastern side rather than being scattered throughout the development;
- The lack of a gate to the small path by the side of Pleasant Place.

Further:

- We applaud the proposal for the area where many rare plants are found to be retained as a species-rich grassland and fully support this. It would, however, need to be larger to be sustainable (see appendix );
- We support to some extent the mix of houses and note that it does essentially contain the smaller dwellings and modest family houses which are needed. However we would like to see some one-bedroom apartments and, ideally, some bungalows to respond fully to the needs of Charing. Affordable housing should be more spread out;
- We like the proposal for a normally dry detention basin but are concerned if the water level would be high enough to present a safety threat other than on very rare occasions. Equally we like the proposal to retain all the ditches and streams but note that one or two can become deep and may need to be fenced;
- We also note the comment by the Environment Agency and the Agency's requirement for more information regarding conditions;
- While an archaeological survey has been carried out no report has been included of its findings;
- More could be made of the woodland area and we would like to see more detailed plans (see appendix );
- We believe all roads should be adopted. It is unfair for residents to have to pay for maintenance which most people get for free;
- There do not seem to be sufficient details concerning making the development low-carbon. Car charging points should be more widespread including the potential for visitor spaces;
- We could not see details of provision for fibre to the premises.

At the end of this note, we set out some proposals for addressing some of these issues.

The site is very difficult to deal with due to the springs, the nature of the ground and the number of ditches that cross it. It is in the setting of the AONB and contains a number of rare plants. The headsoil/topsoil is frequently waterlogged as was/is the case in the adjacent Poppyfields development. While the underlying ground on the site is primarily non-porous clay, the stream that ultimately drains it later runs across or abuts an area of sandy soil. While doing this it loses around a quarter of its water which drains into the aquifer very close to the pumping station which supplies drinking water not just to Charing but to other areas. The prevention of pollution is therefore paramount.

We appreciate that Countryside Properties has taken the difficulties with drainage on board and has taken pains to design a layout that preserves the ditches and their associated flora. We also note that they have listened to the experience with Poppyfields and understand that they are proposing permeable "drainage blankets" to avoid issues of water flooding future gardens. We believe that if changes are made to address the issues mentioned above to which we object, this could be a pleasant development to live in and that would integrate well with Charing.

## **Charing Neighbourhood Plan**

The draft Regulation 14 version of Charing's Neighbourhood Plan was published at the beginning of January. While not yet with full weight, it is still a material factor in planning decisions. Given that plans for this development were in train, and the outline approval was granted, prior to publication it would be unreasonable to expect full compliance with all the Plan's policies. Nevertheless, it is the result of three years research into the needs of Charing and the aspirations of its residents. As such it provides a yardstick against which this application can logically be judged.

### **Absence of an adequate green border with Poppyfields**

We object strongly to the lack of a sufficiently wide and adequately planted green border with Poppyfields. Reinforcing this is part of point c in ABC's policy for this site. A better and wider border consisting of a largely evergreen, densely planted hedge, including prickly native species, and some trees is needed for the following reasons:

- To provide a distinct separation between the two developments to avoid the impression of sprawl, help create a distinction and a sense of place
- To improve security and discourage crime – please see the comments from Kent Police which we strongly endorse.
- To enable proper maintenance of streams, hedges and trees – we do not believe that current plans allow for this adequately
- To protect the amenity of certain Poppyfields residents
- To discourage future residents from throwing grass cuttings or other things in the ditches

The impact on the amenity of Poppyfields residents is accentuated by the placement of affordable, and thus denser, housing on the Eastern side of the proposed development. This is one reason why it would be preferable to disperse such housing more throughout the development.

The area backing Towner Close is particularly problematic as the proposed houses would be very close to some in Towner Close as well as to Cleardowns and Pleasant Place. The ends of some gardens in Towner Close seem closer to the backs of the houses backing onto them than their own backs. Kent Police have also highlighted security concerns in this area. In addition, this particular part of the development will be particularly visible from the AONB and needs additional tree planting to screen it. Finally there needs to be a gate to the lane by Pleasant Place (see below). Thus this section is particularly in need of a redesign and a reduction in the number of dwellings.

### **Lack of Provision for the Greenway**

Turning footpath AW35 (along with other footpaths close to Charing Heath) into a Greenway (combined all-weather footpath and cycleway) is a major project in Charing's Neighbourhood Plan. It is also a high priority project in Ashford's Cycling Strategy. Further it was recognised in the S106 agreement since the Developer has to provide funds to KCC to enable the stretch of the Greenway either side of the development to be constructed with the clear implication that the stretch running through or alongside the development would be constructed as part of the development.

The construction of this also enables a quick route to the station and Charing Surgery. The distance from the edge of the development along this route is under half a kilometre to both. In contrast

houses at the rear of the development would be faced with a distance of around 1.3 km thus clearly increasing their propensity to travel by car rather than walk.

We note that it is believed the current footpath is on railway land but part of the Greenway project will ensure discussions with landowners. In any event part of it would need to be on the site.

This is a major requirement.

### **Safe access from the A20**

The proposed access for this site and that for the adjoining site – S28, Land Rear of Northdowns Garage - are very close together. Part of S28 has full permission (application 17/00865 for a mixed commercial and residential building) and part outline permission (17/01926 for up to 17 dwellings). When permission was given (at the same planning meeting) for outline permissions for this site and 17/01926, concern was expressed by the Planning Committee at the closeness of the two accesses. This concern is fully shared by the Parish Council. It must be remembered that site 55 and site 28 together are intended for around 200 dwellings, once the second part of S55 is built, so that the amount of traffic will be significant. In addition there will be a third access to the west to serve Charing Motors.

The road layout plan for the non-material amendment, document <https://planning.ashford.gov.uk/planning/IDOX/default.aspx?docid=1857320> helps to show how absurd the proposal is. Traffic coming from Maidstone will easily be confused by the three possible junctions and could well select the wrong turning lane, then attempt to correct at the last minute. Two streams of traffic aiming to turn right out of the two exits will create potential conflicts with traffic waiting to turn right into them. We remain baffled as to how KCC Highways could ever have considered this dangerous arrangement satisfactory.

Fortunately there is a solution since there is a link road between the two developments so when both entrances are built one of them should become the sole entrance with the other for pedestrian and emergency use only. Since the commercial units on application 17/00865 could be shops, and one could become a restaurant or takeaway, that should clearly become the main entrance. It follows that the link road will become the main entrance to Land South of the Swan and should therefore be constructed with a full 5.5metre width.

### **Protecting views from the AONB**

We agree with the comments from Kent Downs AONB regarding the importance of protecting the views from the AONB. Much of the site is currently screened, or partly screened, by the trees in the grounds of the Swan. However as this is in separate ownership the continued existence of the trees cannot be guaranteed. Therefore policy S55 in the Local Plan rightly calls for additional tree planting along the northern boundary of the site which does not appear. We note also comments from Natural England and Pluckley Parish Council.

The need for this is increased by the fact that houses at the northern end will be 0.5 metres higher due to the need to have a sufficient slope for the drainage system to work. This 0.5 metres raising of the northern end will be reduced as one travels southwards through the site to zero at the southern end.

We also agree that there must be some additional planting of suitable, native tree species along the ditches although care must be taken that this does not adversely affect rare plants and it should be avoided in the proposed "ecological area". (see Appendix)

Finally we also agree with Kent Downs that white surfaces should not normally be used on the north sides of houses. White surfaces were used frequently in Poppyfields. Photographs taken from footpaths on the AONB show how that estate is more visible than it needed have been in views from the AONB. This mistake should not be repeated.

### **Drainage and sewers**

Horrendous problems occurred with these on the Poppyfields development. At one point residents, facing the prospect of becoming legally responsible for drains and sewers which were considered unadoptable by Southern Water, were initiating legal action against the developer. In the end this was resolved by ICOSA agreeing to adopt the drains. But the access points to some drains had to be altered, and in turn this required some roads to be resurfaced, all of this resulting in inconvenience for residents and significant additional cost to the developer. It is in everyone's interests that such problems do not occur again. It is therefore essential that an entity is identified now to take future responsibility for drains and sewers, whether that be Southern Water or a regulated company such as ICOSA, and that that organisation approves the design of the system and monitors the installation work. The Poppyfields problems could have been avoided had drainage been considered properly early on in the planning process.

One area of concern is the pumping station which will pump foul water back up to the main sewer. Potential blockages affecting 135 dwellings would be very serious. In addition there is concern from nearby residents as to how noisy it will be.

In connection with this it is also noted that Southern Water considered, when consulted at outline stage, that there was not enough capacity in the current sewage system and planned a study to resolve the best way to deal with this (see the section on foul drainage in the Planning Officer's report to the Planning Committee on the outline application). It is very concerning that current plans appear to be to connect to a main sewer where there are already recurring problems (indeed there was one this month). As well as affecting residents, these problems affect Charing's GP Surgery where the Practice Manager has informed us that there have been recent incidents of dirty water bubbling up in toilets and clinical sinks.

No information appears so far to have been provided by Southern Water. We appreciate that technically this is not a planning issue since it is the responsibility of Southern Water to find a solution. Nevertheless this is such a potentially serious problem that we do not believe any planning permission should be given until Southern Water have published a plan for dealing with the matter and a timetable for installation which will see needed works completed well before any of the new houses are occupied.

We note also that there are recurring problems with another sewer in the locality, which passes through Poppyfields, Charing Green and Hitherfield.

### **Parking Provision**

Parking provision is said to meet Ashford's standards but it only does so with a substantial amount of tandem parking, including triple tandems, and the minimum requirements for visitor parking of 0.2

spaces per dwelling. In addition there is no additional compensatory provision for a triple tandem compared with a double one. Charing's Neighbourhood Plan (policy T6) requires that tandem spaces are not counted and that visitor provision is 0.5 spaces per dwelling. Further, KCC Highways have indicated that they have issues with the parking provision and Kent Police have expressed reservations about the security issues connected with rear parking courts.

We suggest that visitor parking standards in Poppyfields, which work well, are used as a guide. This has 18 visitor parking spaces for 61 houses – i.e. 0.3 spaces per house. However there are only four houses with tandem parking and many houses have large drive areas so that visitors will often be able to park on drives rather than in spaces. 0.3 visitor spaces per house would therefore be a minimum.

### **Limited number of house designs and general character**

While the house designs are pleasant they are fairly conventional. We feel a little more variety would give the place more character. We would not object to some designs with a more contemporary twist. Charing Design Statement (the provisions of which are further endorsed in the Neighbourhood Plan) says, for example, *“Although the recommendations generally refer to the traditional styles and character of the parish, this should not be a barrier to the introduction of imaginative and innovative design which is complementary to the surroundings.”* It also says, *“The many local examples of simple terracing of up to six houses are recommended as models for inclusion in any future layouts.”*

### **Access to lane by Pleasant Place**

Ownership of the short, unmade up lane by Pleasant Place is unclear; the land registry has no records. It is the only current access to most of the site and has been in use for many years. It will provide a shorter pedestrian route for most houses into the village than the main access and thus make the site more sustainable. It is highly desirable therefore that it is not blocked off and remains as a pedestrian path.

### **Tenure mix**

Charing's Neighbourhood Plan, while supporting an overall 40% allocation of affordable homes, stipulates that a higher share – 40% – of affordable houses (i.e. 16% of the total) should be affordable rented than ABC's policy of 25% (i.e. 10% of all houses). This is based on the Housing Needs Assessment by AECOM carried out for Charing's Neighbourhood Plan (available as part of Evidence Book 1 at <https://www.charingkent.org/wp-content/uploads/2020/01/Book-1-Projects-101-109.pdf> Project 103 at page 13 onwards). This undertook a more nuanced look at needs for Charing compared to those in Ashford as a whole and concluded that affordable houses should be divided as follows (para 113):

- 40% affordable/ social rented products;
- 60% affordable home ownership products of which:
  - 35% Shared Ownership;
  - 15% Starter Homes; and
  - 10% Discounted market housing.

This would suggest that the number of affordable rented houses would be increased from 14 to 22 with the number of shared ownership reduced to keep the overall number of affordables unchanged.

### **Housing mix**

The proposals include 12 2-bed apartments (9% of total), 28 2-bed houses (21% of total), 60 3-bed houses (44%) and 35 4-bed houses (26%). Charing Neighbourhood Plan Policy H7 specifies the following mix of homes: 10% 1-bed, 40% 2-bed, 40% 3-bed and 10% 4-bed. This is based on assessments of the need for different sizes of houses in the village and, in particular, the need for smaller houses including starter homes, modest family homes, houses for “downsizers”. (Again, please see Charing’s Housing Needs Assessment referenced above which also details the mix for both affordable and open market dwellings.) The number of 2-bed houses falls somewhat short, there are no 1-bed dwellings and there are more 4-bed houses than specified. As against this we note that the 4-bed houses are comparatively modest (compared, for example, to the 4-bed houses on Poppyfields).

The mix does therefore come some way to complying with Charing’s needs. Nevertheless we believe it should include, at least, a number of 1-bed apartments, both affordable and open market. There is also a need for bungalows in Charing.

Replacing some of the larger dwellings by a number of one-bed apartments would help address some of the other problems noted by reducing the total amount of space required for both housing and parking.

### **Placement of different housing types**

While there is a reasonable mix of house sizes we note that 2-bed houses and apartments are predominately on the East side and four-bed houses predominantly on the West side. The tenure mix shows that the “affordables” are almost entirely in the Eastern half. We feel there should be more mixing of houses by size and tenure in order to encourage social interaction, avoiding “them and us” situations and being true to a traditional village character where larger and smaller houses are found side by side.

Based on Poppyfield’s experience we also wish to highlight the need for future management arrangements and covenants to be the same for affordable and open market houses.

The Parish Council has not had an opportunity to discuss with Orbit, which we understand will be both the future owner of the affordable rented accommodation and the future management company of the estate. We believe discussion is essential to understand each party’s concerns.

### **“Ecological area” and issues (see also appendix)**

Please see the appendix on ecological issues generally. The developer should be credited with the decision to set aside a small, botanically diverse grassland area where the rarest plants grow (sometimes referred to as the “ecological area”). However we believe that to be sustainable it needs to be larger particularly as some of it will be a detention basin, construction of which will damage existing flora. In addition it is adjacent to the main access road, which will make the site more vulnerable. We will be happy to discuss this in more detail.

We applaud the decision to maintain the network of ditches running through the site and their associated plant life. However we believe more could be made of the woodland area in the south-east. Apart from tidying this up, we believe there should be a bridge to it over the ditch and a boardwalk or bark path. It could become an interesting area for children complementing the play area.

A maintenance plan for it will need to be established.

### **Detention Basin and general safety**

Assuming it can work as promised we like the idea of a detention basin which most of the time can be part of informal green space to be enjoyed by residents. We note the importance of general management and maintenance particularly as it is crucial to ensuring that the stream, part of which will become our water supply, does not become contaminated.

We would like assurances that water in the basin will rarely be so deep as to be a safety issue. In addition attention needs to be paid to ditches which could become dangerously deep at times. It would be preferable that fencing is kept to a minimum but there will be areas of the site where this is necessary.

Most of the site is away from the A20. With the playground, the informal open space and the wooded area this could be an area where children, other than the youngest, could play and explore relatively safely, and also learn to manage an appropriate level of risk, with limited supervision. It is important therefore to ensure that risk is kept to an appropriate level.

### **Archaeology**

Trenching was carried out last Autumn but no results have been published. It is therefore not possible to judge whether further investigation is required. It is known that both Roman and pre-Roman settlements existed in the area and excavations elsewhere in the village have made significant finds. The trenching was carried out during wet weather which is not ideal and we understand no trench was constructed near to the A20 where it is thought a Roman road could have run.

### **Environment**

There seem to be limited details of how the development will limit carbon emissions. More information is needed here. We are keen to see full provision for electric charging points including potential for these to be on visitor spaces.

### **Broadband provision**

We could not find any mention of providing fibre to the premises (Local Plan Policy EMP6, Charing Neighbourhood Plan Policy C5). Poppyfields experience suggests that care must be taken to avoid limiting the number of future suppliers.

## **Proposals**

As discussed this site has many constraints. It has not been easy to place 135 houses in it and we appreciate that requirements for a wider green border with Poppyfields, additional tree planting along the Northern edge, increased parking and a larger “ecological area” will make it more difficult. To address these issues we propose some mix of the following options:

- i Reduce the number of dwellings. 135 is an upper limit. S55 as a whole is for 180 houses and if they are built on the two areas in proportion Land South of the Swan would have 120 to 125 houses. When proposed as an omission site to the draft Local Plan in 2016, 100 dwellings were suggested.
- ii Replace some of the larger houses by 10 one-bedroom apartments. This will also reduce the parking requirement.
- iii Relocate some houses. To the west of the proposed access road is a thick and dense belt of trees, some of limited ecological value or in only fair condition. We believe a few houses



could be placed here north of the proposed detention basin while still leaving sufficient trees to provide screening for views from the AONB. We would also like to see some more houses, subject to this working as regards drainage, around the playground/informal space/detention basin area. This would help to make the area more of a focal point and increase supervision helping to prevent anti-social behaviour and vandalism.

- iv Increase the use of terraced housing. The proposals contain some small terraces but the Neighbourhood Plan (and Charing Design Statement) suggests terracing of up to 6 houses (policy D2).
- v Possibly consider replacing the detention basin by underground storage tanks with open space above as at Poppyfields to give a little more space for housing. We appreciate that this would require pumping.

### **Future ownership of certain areas**

Under the S106 agreement it is at the discretion of the developer whether future ownership of the playground and the informal open space is transferred to the Parish Council or the future management company. We confirm again, as frequently mentioned before, that the Parish Council is keen to acquire the playground. We wish to discuss the remainder of the open space including the “ecological area” and the wooded area. Whoever owns it, we believe that future management of the “ecological area”, and potentially the wooded area, should be in the hands of a voluntary group, hopefully including some future residents. This is how the Alderbed area in the East of the village is managed and it works very successfully.

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## Appendix: Ecological Summary for Land South of the Swan Development

### Wildlife Meadow

The land in question is rich botanically, the plants support an enormous number of invertebrates, and hence a range of amphibians, reptiles, mammals and birds. Although there was awareness of this, in 2019 an area of the meadow was mown, just before the Common Spotted-orchid *Dactylorhiza fuchsii* started to flower. There were more than a hundred plants in the area and this action was ecologically inexplicable and inept. Planning permission had been granted for this site subject to two conditions relating to ecology being met: there has to be enhancement and also management of biodiversity.

Some of the plants present are unusual in Kent e.g. Bog Pimpernel *Lysimachia tenella* (*Anagallis tenella*), Fen Bedstraw *Gallium uliginosum* (although not nationally threatened, **both are on the Kent Rare Plants Register**), Blue Water-speedwell *Veronica anagallis-aquaticq*, and Adder's-tongue *Ophioglossum vulgatum*. More survey work has been completed, and the Kent Wildlife Trust (KWT) believes that the area may be interesting enough to be designated as a Local Wildlife Site. It could be classified as **species-rich neutral grassland**, which is a rare habitat in Kent, only 3.4% of grassland being of this type. Countryside Properties in their ecological update (ABC Planning Application 20/00508/AS Ecological Update) have put aside a small, grassland area of the site in the south west, labelled 'Areas of most botanically diverse grassland (including calcareous influenced grassland, marshy grassland and ditch banks) retained and managed to enhance site biodiversity' (ABC Planning Application 20/00508/AS, Indicative Landscape Master Plan). **Because of its small size this area would be unsustainable** and the rare plants growing there at present would soon start to disappear. Their plan is to plant a small, new wildflower meadow, but the present ecosystem has built up over very many years and is of great interest because of the diversity of species, all suited to the terrain and the climate. In addition there is to be a detention basin sited in this area. The construction method for this is not clear, but according to the plan in the drainage technical note, it occupies a large area, so further reducing the size of the area of interest and its viability.

The problem is that in a small, fragmented area the population of each species will be small and the edges are close to the centre, which makes each species more likely to die out, and be vulnerable to disease, predation, effects of weather and disturbance, and there is no chance of recolonization from surroundings. In addition, one border lies along the access road, which means that conditions are very different here, and this will further impact the viability of the area. The rare plants are likely to quickly become extinct.

Vincent Ganley of KWT recommends an area of at least **0.8 hectares** for a wildlife site here to be sustainable. If this were realised it could be managed as a wildlife reserve and it would be a source of pride for the residents and for the village. Any area of grassland would need long-term monitoring and management, preferably by seasonal grazing, alternatively by seasonal mowing followed by raking and removal of all arisings. Fencing would be required and boards explaining the natural history interest of the reserve would enhance its value. With some limited restrictions, residents could be encouraged to enter and enjoy the area. Because there are no nationally rare species or habitats on this site, Natural England (ABC Planning Application 20/00508/AS, Consultee Comment) does not object to the DHA proposals, although within Kent its own rarities need conservation.

## Hedgerows

Hedgerows are an important nature reserve in their own right and, properly managed, can be a haven for plants and animals. It is good to see that Countryside are planning to retain the hedgerows, replanting where necessary to fill gaps.

## Streams and ditches

In some cases, ditches run along the field boundaries and streams also cross the open grassland areas. They are important for wild-life and some of the banks are of great botanical interest. It is clear that Countryside have recognised this and their plans show that most will be conserved within habitat corridors.

## Trees

Nearly all the trees on site are to be conserved, apart from those which are to be removed for construction of the new access road, and native species are to be newly planted (ABC Planning Application 20/00508/AS 020, Addendum Arboricultural Impact Assessment). However, there is a big gap in the information provided concerning the existing small woodland in the extreme south-east of the site, where there is currently a number of interesting old trees. The information box on the Indicative Plan states, 'Existing woodland retained and managed to enhance biodiversity value, fly-tipping removed' (ABC Planning Application 20/00508/AS, Indicative Landscape Master Plan). Surely this is a **key ecologically important area**; there seems to be no reference to it in the Arboricultural Impact Assessment report and it does not appear to be mapped correctly on Tree Protection Plan AIA Addendum Sheet 3 of 3.

The Kent Downs AONB (ABC Planning Information, Kent Downs AONB) are requesting the planting of more trees along the edges of ditches east-west across the site. However it should be noted that if trees are introduced along the two branches of the streams in the planned botanically diverse grassland area this would diminish the possibility of survival of several rare species.

## Monitoring and Management

A regime for long-term monitoring and management of each of the diverse ecosystems on the site needs to be planned and detailed by DHA. This includes those habitats already there and new habitats to be created. Regular monitoring must take place to inform management.

During the winter of 2020, heavy vehicles did a lot of damage around the stream banks in the meadow area which is planned to be 'the area of most botanically diverse grassland'. There is great detail in the Addendum Arboricultural Impact Assessment concerning steps to be taken to protect the trees **during the construction phase**, including advice to contractors. This should be extended to protect the areas of botanical biodiversity.

The needs of the species-rich habitats must be addressed. This means a clear understanding of the requirements of the plant communities and of their habitats, and their reliance on the hydrology of the site. Recognising what is needed for **maintaining** a viable community is of key importance, to be followed by a clear **annual management strategy**, described in a detailed Ecological Management Plan. This should include a **monitoring** regime, starting with a baseline survey, to inform ongoing management.

Without the right conservation measures the biodiversity of the site would soon be lost.