

Open Floor Hearing Statement: Ecology and Biodiversity

Dr Helen Stark [REDACTED]

I appreciate the opportunity to speak to you today.

I am a chartered environmental scientist, with specialisms in terrestrial and freshwater ecology; environmental impact assessment; and environmental policy, procedure and management. I've worked on a variety of projects including wind farms, housing developments, and habitat creation projects. During my career in civil engineering, I was also seconded to the Environment Agency to assist with the scoping of discharge consents under the Habitats and Birds Directives; and to English Nature (now Natural England) to assist the freshwater team. In addition, I have acted as an Environmental Clerk of Works and have trained contractors on site. I am working as a volunteer for this proposal.

In the past, I have led ecological walks for primary school children in Keysoe and Upper Dean, teaching them about the environment. They are very enthusiastic about being outside and looking at habitats and species. I have taught them bird watching, which they adored.

I would like to address the proposal's impacts on ecology and biodiversity, particularly in relation to habitats, species and overall ecosystem functioning.

The applicant has presented an incomplete baseline and omitted protected species data. These gaps need to be addressed by submitting multi-season, multi-taxa survey data, which are scrutinised through independent ecological audit undertaken by suitably qualified professionals. This is critical as conclusions about impacts, residual effects or biodiversity net gain cannot be reached at present.

Examples of these omissions include:

- Understatement of the importance of, and impact on, farmland birds such as skylark (approximately 125 territories).
- For otter and water vole, no exclusion, pre-construction survey, or buffer protocol is set out in the Outline Construction Environmental Management Plan (CEMP).
- No targeted invertebrate surveys were undertaken, even though these are an important element of the ecosystem functioning, for example providing food sources for birds and bats.
- The baseline for great crested newt, a European Protected Species, is incomplete. In this case, the ponds excluded or omitted from the survey cannot be assumed to be functionally irrelevant. It should be noted that terrestrial habitat is also important for great crested newts.

The existing data was obtained in June 2022. Government advice states that data is only valid for a four year period. If a development is predicted to have a negative effect on great crested newts, it is important that recent data is obtained.

Notwithstanding the further work required to fully determine the baseline, it is clear the proposal will have negative direct and indirect impacts on habitats and species.

Specific impacts include:

- Loss of habitat; and habitat mosaics, both in space and time. Mosaics are important for all species and cannot be re-created easily.

- Altered flight paths and foraging behaviour in birds and bats.
- Polarised-light attraction and trap effects.
- Secondary effects such as increased predation or displacement into sub-optimal habitats.
- The cumulative effects of these impacts (with other projects); and in-combination (or intra-project) effects are inadequately assessed.

In addition, the Environmental Statement does not assess ecosystem services associated with the existing farmland and corridor network including habitat connectivity functions and flood alleviation.

Much of the proposal's area is habitat. Habitat loss; habitat fragmentation; loss of species; and potential colonisation and / or spread of non-native species at this scale are significant adverse residual long-term impacts, even with mitigation measures in place. In some cases, habitat cannot be replicated elsewhere at the scale necessary (for example, in the case of skylark, which need a large area for singing and displaying etc.). How will small hedge plants replicate mature, species-rich hedgerows?

In summary, the applicant has not demonstrated that the environmental benefits of the proposal outweigh its huge cost to the local, regional and national biodiversity resource, as well as to environmental education, and mental and physical health.