

**Kelsale-cum-Carlton Parish Council response to Written Submission arising from Issue Specific Hearing 4 by the Applicant on Biodiversity & Ecology**  
**For Deadline 7, 3<sup>rd</sup> September 2021**



The Applicant (after prompting from the ExA) eventually responded to the Biodiversity & Ecology Section of KcCPC's Written Representation (made at D2) in REP 6-002.

The comments (below in blue) are made by KcC's Biodiversity Group as a result of the Applicants response:

*"The statement that the road [SLR] was proposed late in the development timetable, so therefore the information gathered is more limited, is a rather pathetic one - surely, they should wait until the survey has been brought up to the same level as the other studies before the proposals are submitted."*

KcCPC understand the sentiment expressed by the KcC Biodiversity Group and agree that any part of the Applicants development should have adequate survey data to establish a viable baseline and thereby enable the potential impacts of the works to be fully understood and either avoided entirely, mitigated effectively and compensated for appropriately.

*"Despite the acknowledged decline in invertebrates, these are not considered in the proposal."*

KcCPC seek assurances from the Applicant that acknowledged declines in invertebrates will be fully and comprehensively addressed by the Applicant (in writing) prior to completion of the Examination.

*“Unless I overlooked it, I couldn't find any response to the point about the long-term success or otherwise of reptile translocations.”*

KcCPC look to the Applicant to provide evidence of the long-term success of reptile translocations in similar circumstances to those pertaining with the proposed SLR.

*“The few bits of semi-natural habitat nearby (e.g. Fir Tree Farm) are discounted from the equation simply because they aren't directly impacted. Not surprising, I suppose, when they are considering building the power station adjacent to the RSPB's premier reserve!”*

KcCPC believe that semi-natural habitat at sites adjacent or abutting the proposed SLR western roundabout and the works compound (inc. Fir Tree Farm) should not be discounted as their proximity to areas of major disturbance and known resident species need appropriate safeguarding and due consideration.

*“There is no significance attributed to the value of biodiversity at a local level, any specialness of place, its importance and value to people who actually live in the area.”*

KcCPC recognise the value of the biodiversity throughout the whole of the Parish and believe the expedient and incomplete evaluation of the extreme north-west of the Parish by the Applicant and their agents has not identified the extent and diversity within this area, potentially impacting several important habitats and jeopardising valued ecological assets.

In this context, the Parish Council seek to ensure that should the project receive approval, no works should be initiated at the proposed western roundabout site and compound until; a complete baseline is established, appropriate mitigations put in place where avoidance cannot be achieved and the monitoring of adjacent and adjoining ecological assets is in place.