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To: NorthamptonGateway@pins.gsi.gov.uk
Subject: Your ref: TR050006 My ref: 20010550 OFH 14/3/19
Date: 15 March 2019 09:51:56

Dear Ms. Mignano,

As requested, below is my submission to the Open Floor Hearing held on 14th March 2019:

I would like briefly to review Document 7.15: **Ecology and Biodiversity Statement of Common Ground (SoCG) with Natural England.**

In their own words **Natural England (NE) is the government's adviser for the natural environment in England, helping to protect England's nature and landscapes for people to enjoy and for the services they provide.**

During NE and its predecessors' stewardships it is reported that common farmland birds and insects have suffered catastrophic declines in abundance (56% & 75% respectively). The current position is very serious, with species, e.g. turtle doves, facing local extinction. The biome may be near a tipping point, where it simply collapses, with serious consequences for humans as for other species – much food production relies on insects. The causes of decline are not fully understood but habitat loss is surely fundamental.

NE's mission statement sounds extremely hollow in the light of the above.

Nowhere in the SoCG is there evidence that NE appreciates this crisis, let alone has measures against it. A hint of confirmation bias pervades the document. This tone is also reflected in NE's 5/12/18 letter declining to attend ExA hearings: "We therefore have no outstanding issues or concerns and do not envisage attending hearings." It is a box-ticking exercise, accepting that Northampton Gateway (NG) have complied with regulations, but ignoring the elephant in the room by accepting without objection the proposed incursion into undeveloped habitats.

It is suggested that remediation measures on site would result in nil or negligible losses. But c. 5m ft² of warehouses, bunds, and artificial, industrial parkland cannot adequately substitute for the present mosaic of woods, hedges and farmland, the latter still carrying potential for recovery from intensive farming. Also, with very restricted scope for expansion beyond the main site, any such remediation would almost certainly be overwhelmed in due course by more warehousing.

The SoCG appears to illustrate a failure in NE's stated aim to protect England's nature and landscapes. I respectfully ask that you restore some balance by giving due weight to the wildlife (& human) implications of granting a DCO on undeveloped land.

Thank you.

SM Blyth



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