
This representation sets out a formal objection to the proposed development of a new secondary school at

No material considerations have been presented that would justify a departure of this magnitude from the

alternatives do not exist.

- No robust, transparent site selection analysis has been provided to demonstrate that reasonable
- The development is not ancillary; it represents a complete change of land use.
- The site is demonstrably in active community use and cannot be considered surplus.

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- the loss is fully justified and appropriately mitigated
- there are no reasonable alternative sites¹ and
- it can be clearly demonstrated that the site is surplus to requirements; or
- the proposal is ancillary to the principal use of the site; or

In the absence of such evidence, the proposal is in direct conflict with development plan policy.

3.2 Biodiversity – NPF4 Policy 3

NPF4 Policy 3 establishes a clear requirement that development must:

- protect and enhance biodiversity
- avoid significant adverse impacts
- deliver positive effects for biodiversity
- for major development, secure measurable biodiversity enhancement

The submitted Ecological Impact Assessment (EclA) identifies extensive and significant habitat loss, including:

- majority loss of broadleaved and wet woodland
- substantial loss of lowland fen (a priority habitat)
- complete removal of semi-natural grassland and scrub
- loss of mature tree stock and associated ecological function
- degradation of habitat supporting bats and breeding birds

Critically, the EclA concludes that:

- key habitats cannot be recreated
- mitigation measures cannot fully offset losses
- significant adverse residual effects remain

This places the proposal in direct and unambiguous conflict with NPF4 Policy 3. The requirement to leave biodiversity in a better state is not met and, based on the applicant's own evidence, cannot be met on this site.

3.3 Mitigation Hierarchy & Compensation Strategy

The mitigation strategy presented fails to comply with the established mitigation hierarchy (avoid → minimise → restore → compensate).

- **Avoidance:** Not achieved, as site selection has not demonstrated that impacts are unavoidable.
- **Minimisation:** Limited, given the scale of habitat clearance proposed.
- **Restoration:** Not feasible for key habitats such as wet woodland and lowland fen.
- **Compensation:** Relied upon prematurely and without equivalent ecological value.

The proposed off-site compensation at Myrtle Avenue is materially deficient:

- It does not provide like-for-like habitat replacement
- It lacks secured delivery through the planning process
- It cannot replicate established ecological systems within a meaningful timeframe

As such, the compensation strategy does not meet policy requirements and carries limited weight in the planning balance.

3.4 Green Network & Natural Infrastructure

Whitegates Park performs an important function within the Green Network, contributing to:

- habitat connectivity and ecological corridors
- urban climate regulation
- natural drainage and flood attenuation
- community access to green infrastructure

NPF4 places significant emphasis on safeguarding and enhancing such assets. The fragmentation and loss of this site would undermine network integrity and conflict with national spatial strategy objectives.

4. Environmental Constraints & Site Suitability

The site exhibits characteristics that raise concerns regarding its suitability for development:

- known drainage constraints and areas of standing water
- reliance on permeable soils for natural water management
- potential ground condition and contamination uncertainties

The introduction of extensive built development will reduce infiltration capacity and increase surface water runoff, contrary to sustainable drainage principles and climate resilience objectives embedded within NPF4.

These factors further reinforce that this is not an appropriate location for development of this scale and sensitivity.

5. Planning Balance

In applying the statutory planning balance, the following considerations are relevant:

Benefits

- Provision of new educational infrastructure

Adverse Impacts

- Permanent loss of protected open space
- Significant and irreversible biodiversity loss
- Conflict with NPF4 Policy 3
- Failure to demonstrate absence of alternative sites
- Weak and ineffective mitigation strategy
- Harm to Green Network integrity
- Environmental and drainage concerns

The adverse impacts are substantial, policy-based, and supported by the applicant's own technical evidence. They are not outweighed by the general benefits of school provision, particularly where alternative sites may exist.

6. Conclusion

The proposal represents a clear departure from the development plan and fails to comply with key provisions of National Planning Framework 4.

It would result in the unjustified loss of protected open space and cause significant, irreversible ecological harm that cannot be adequately mitigated or compensated.

