

Please read in conjunction with

Alton Orchard Action Group Objections to Application SMD/2015/0151

submitted by Michael Sutcliffe and Associates.

From Steven Oram, PTES.

Further to Mr Sutcliffe's report, I would add several comments of my own.

At 'Section 5: update', a comment is made by Mr Sutcliffe as to new information coming to light after the application was submitted, in particular that the orchard has been recognised as BAP priority habitat. It is important to recognise that even though the orchard was not included in the national inventory when it was first published, it is of course in no way inferred that it was not a traditional orchard before inclusion. The nature of habitat mapping means that some parcels of habitat are overlooked. All habitat inventories are supplied as 'provisional' as it is inconceivable that every last occurrence of a habitat can be exhaustively identified and mapped. Ecological reports and landscape evaluations must be done by trained and qualified persons who have the capacity to independently identify habitats. It is their duty to look for and assess habitat value. The most perfunctory phase 1 survey would be able to recognise a traditional orchard.

Regarding the Evolution Ecology *Bat and Bird Presence/Absence Survey*, it is important to note two glaring omissions:

1. The orchard and trees were not surveyed for bat roosting, and not targeted for any systematic bat detection surveys or searched for roosting sites, the only recording from the orchard being incidental foraging records collected during the survey of the cottage. Hollowed-out trees, such as the one that has been removed (without a bat survey) despite a TPO, are prime bat roosting sites. To not survey for bat use in the orchard is contrary to the laws regarding biodiversity protection and sustainable development.
2. **There is no bird survey!** The only reference to birds beyond a desk study is that old nests were found in the cottage, and that the cottage should be checked for nesting birds before

demolition works (I know from experience that this won't be done). The report does not satisfy its title and is not a suitable or sufficient ecological report for the application.

Section 0.3 of the Evolution Ecology report concludes with the statement

"Even bearing all of the above information in mind, none of these species have been identified on the site of interest itself."

This statement has no place in an objective ecological assessment and is indicative of reporting bias. The first rule of scientific enquiry is "absence of evidence is not evidence of absence". The reason no records exist for the site is almost certainly because no surveys or observations have been conducted on the site or submitted to the recording authorities (ultimately the Biodiversity Recording Centres), ergo, no records exist. To suggest otherwise is a serious distortion of evidence and a departure from accepted scientific method.

Evolution Ecology report 3.2.1 states:

"...but the surrounding area to the south is dominated by agricultural grassland, scattered trees and hedgerows. All of these habitats provide the potential foraging and sheltering opportunities required for local bat and bird populations to thrive."

This is to say that they conclude that the loss of the orchard site is immaterial (despite not having conducted any ecological surveys on the site) because there are sufficient alternative forage and shelter sites in the locality by way of agricultural fields, scattered trees, and hedgerows. This couldn't be further from the truth: the loss of any resource for wildlife to forage or nest has an impact, however small that loss might be. The cumulative effect of this piecemeal habitat loss is the very cause of the biodiversity loss that we have introduced laws and guidelines to prevent.

To be clear, agricultural fields are not good for foraging bats, and limited for the vast majority of bird species to forage and, a handful of field-nesting species aside, do not provide shelter for either. Scattered trees have some biodiversity potential but are limited due to their lack of associated context. Hedgerows are good habitat, but very different to traditional orchards and can't be considered as an equivalent or equal alternative. A traditional orchard is a distinctive habitat of principal importance in its own right.

Paragraph 4.3.3 repeats the spurious conclusion:

"...it is anticipated that [the orchard's] loss would be of relatively low detriment to the bats, as alternative foraging areas are present within the immediately surrounding semi-rural landscape."

As before, Evolution Ecology have not surveyed the orchard so are not in a position to comment on any impacts that its loss would have. However, I would also question how they came to this conclusion without surveying the bats' use of the surrounding landscape. For all they know, the bats

are foraging exclusively at the orchard and flying to and fro a maternity roost, which may even be in the orchard itself but they didn't survey for entry/re-entry in the orchard so would have no idea. This statement is a strong indication that the report is subjective and biased in favour of the development.

In summary, **the orchard and grounds remain unsurveyed for bat and bird biodiversity at even the most basic level.** The survey is only valid with regards to bat biodiversity within Ivy Cottage itself, but considering the subjectivity of other statements the reliability of even this is questionable. It is known, for example, that a tree sparrow *Passer montanus* colony (listed by the RSPB in the 'most threatened' category of birds of conservation concern) has used the orchard and may be nesting there.

This report should be dismissed as unreliable. Without an appropriate bat and bird survey this application cannot be allowed to progress.

