May I first quote from article 6 of the European Habitats Directive: “An appropriate assessment of the plan or project must precede its approval and take into account the cumulative effects which result from **the combination** of that plan or project with other plans or projects”.

Whilst this resubmitted application has introduced mitigation measures for the site, these measures are narrow and inward-looking. It does not nor can it, as the Habitats Directive and Planning Inspector’s decision require, take account of the **in-combination effects** of this plan with other approved plans – the Hannick, Gladman, Copenacre and Hanson plans in particular which all sit within a hundred or so metres or indeed, in the Hanson case just metres from this site.

Significantly, for one of the sites concerned – the Hannick site, not only have possible in-combination effects not been taken into account but as the Planning Inspector said: “The Council acknowledge that the developers of the Hannick Rudloe scheme had not been required to submit information to inform an appropriate assessment” **at all**.

And unless documents have gone missing, there is no Appropriate Assessment from the County Ecologist nor any representation from Natural England on the Council’s webpages for the Gladman development for land north of the A4 at Pickwick. Indeed, in his appeal decision the Planning Inspector for the Gladman site mentions eight other assessments but none relating to bats.

Additionally, no appropriate assessments have been carried out for the two extant planning applications for the Copenacre site.

The County Ecologist’s Appropriate Assessment for the Redcliffe plan, in the section “Is the project likely to affect site integrity in combination with other projects” fails singularly to discuss ‘**other projects’** concentrating solely on the mitigation measures of the project in question. The same situation obtains with the Hanson mine application.

Just to give one particular illustration - whilst dark corridors have been proposed within the site, what effect will the two (at least) 30-metre long, 6-metre high buildings and other structures proposed by Hanson across the Bradford Road, and just metres away from the Redcliffe site, have on bat foraging routes? In geographical terms, the Hanson buildings could effectively be seen as part of the Redcliffe development.

In spite of the Planning Inspector’s ruling, no attempt whatsoever has been made to correlate one planning application with another.

In his conclusion, the Planning Inspector stated: “There is not sufficient information to conclude that there would be no significant effect when the appeal scheme is considered **in combination** with other projects or developments in the vicinity”. No such considerations have been made by Wiltshire Council or Natural England who have effectively sidestepped the issue. There **is** no report on in-combination effects.

Approval of this application would drive a coach and horses through the Planning Inspector’s ruling, contravene the Habitats Directive and impugn the judgement in the Waddenzee case.