

Ecological Assessment



Haven Banks Retail Park, Exeter
14th February 2023



**Tyler
Grange**

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Summary

- S.1. Tyler Grange Group Ltd. were instructed by Union 4 Planning in April 2022 to undertake an ecological assessment of the Haven Banks Retail Park, Exeter, Devon, hereafter referred to as the 'site'.
- S.2. A planning application for the demolition of the existing retail building and the redevelopment of the site to form a 425-residential home-led development, including retail and leisure facilities, access, car parking and landscaping is to be submitted to Exeter City Council.
- S.3. The site is located within the city of Exeter, situated at the site of the existing Haven Banks Retail Park. The site's northern and southern boundaries are defined by residential housing. The site's western boundary is defined by Water Lane, beyond which is more residential housing. The eastern boundary meets the existing Activity Centre, beyond which is Haven Road and the River Exe beyond that.
- S.4. The site is not covered by any statutory or non-statutory protected sites, although a number of such sites are present locally. Measures will be implemented pre and post construction to ensure that no impacts occur to any designated sites as a consequence of the proposals.
- S.5. The habitats on site comprise a large area of hardstanding carpark with one large building that contains the three retail units that make up the Haven Banks Retail Park. The northern and western boundary of the site are lined by introduced shrub planting and trees. As a result, the majority of the site is unsuitable for most protected and priority fauna as the habitats that support them are not available.
- S.6. No Phase 2 ecological surveys are necessary as a result. As a precautionary measure, the building on site should be demolished under the supervision of a suitably qualified ecologist. If a bat or evidence of a bat roost is recorded during the demolition process, then all work will stop, and a Natural England licence applied for and suitable mitigation implemented.
- S.7. In addition, due care and consideration should be given to species such as hedgehog and badger that may inhabit areas of soft soil or become trapped in ditches during construction. Such mitigation methods would be further detailed within a Construction Environmental Management Plan (CEMP).
- S.8. The proposals see an overall ecological enhancement of the site through new planting of trees, introduced shrub, neutral and amenity grassland, creating habitats that are not currently available on site and resulting in a net gain in biodiversity, and providing increased value to a range of local wildlife. A sensitive lighting scheme would be designed and implemented to ensure that any features that could be in use by bats are not detrimentally affected by lighting and that opportunities for these species are maintained post-development.
- S.9. In addition, the proposals see the provision of new bird nesting areas through the incorporation of bird boxes and bricks into the new buildings or suitable trees, in accordance with the South and South-West Exeter Residential Design Guide SPD.
- S.10. With the implementation of the mitigation and enhancement strategy described, the proposed development would be in conformity with relevant planning policy and legislation, as set out in **Appendix 1**. The strategy could be controlled by appropriately worded planning controls,



including an appropriate Construction Environmental Management Plan (CEMP) to prevent impacts to protected species and adjacent habitats during construction, and a Landscape Environmental Management Plan (LEMP) to maximise biodiversity of the newly created habitats.



Section 1: Introduction and Methodology

Introduction

- 1.1. Tyler Grange Group Ltd. were instructed by Union 4 Planning in April 2022 to undertake an ecological assessment of the Haven Banks Retail Park, Exeter, Devon, hereafter referred to as the 'site'. The site is centred on National Grid Reference SX 91970 91837.
- 1.2. A planning application for the demolition of the existing retail building and the redevelopment of the site to form a 425-residential home-led development, including retail and leisure facilities, access, car parking and landscaping is to be submitted to Exeter City Council.
- 1.3. The purpose of this report is therefore to:
 - Use available background data and results of field surveys, describe and evaluate the ecological resources present within the likely 'zone of influence' (Zoi) of the proposed development;
 - Assess ecological issues and opportunities as a result of development; and
 - Where appropriate, describe mitigation and enhancement proposals, together with planning controls to ensure their delivery and conformity with relevant policy and legislation.

Context

- 1.4. The 'site' is defined by the application red-line boundary (see **Plan 14769/P02a**) and is located wholly in Devon (see **Plan 14769/P01a**). The 'study area' extends to a 1km radius for protected and Priority Species records, 2km for bat records, 2km for non-statutory site designations and nationally designated statutory sites and a 10km radius for European statutory designated sites.

Methodology

- 1.5. This Ecological Assessment has been informed by the following, with detailed methods provided in **Appendix 2**:
 - Full desk study and records search;
 - Phase 1 habitat survey; and
 - Building in section and Preliminary Bat Roost Assessment (PBRA).
- 1.6. The above scope of work has informed the description and assessment of importance of ecological features - in line with the 'Guidelines for Ecological Impact Assessment' published by the Chartered Institute for Ecology and Environmental Management (CIEEM) (CIEEM, 2019) - the consideration of opportunities and constraints to development, and mitigation and enhancement requirements to ensure conformity with legislation and policy (see Appendix 1). In addition, all work undertaken complies with British Standard's for Biodiversity – BS42020 (BSI Standards Publication 2013).



Quality Assurance

- 1.7. All ecologists at TG are members of CIEEM or are working towards their membership and abide by the Institute's Code of Professional Conduct.



Section 2: Ecological Features and Evaluation

- 2.1 Ecological features within the site are described below, together with an assessment of their importance using a geographical frame of reference advocated by CIEEM (2019).

Site Context

- 2.2 The site is located within the city of Exeter, situated at the site of the existing Haven Banks Retail Park. The site's northern and southern boundaries are defined by residential housing. The site's western boundary is defined by Water Lane, beyond which is more residential housing. The eastern boundary meets the existing Activity Centre, beyond which is Haven Road and the River Exe beyond that.

Protected Sites

- 2.3 The site is not covered by any statutory or non-statutory designation for nature conservation importance, although several designated sites are present in the study area, which are detailed in the table below.

Table 2.1: Protected Sites

Designation	Site Details	Importance
European Protected Sites	<p>Exe Estuary Special Protection Area (SPA) and Ramsar site (also an SSSI)</p> <p>Located approximately 3.1 km south-east of the site. The Exe Estuary SPA and Ramsar is designated for the presence of overwintering populations of avocet <i>Recurvirostra avosetta</i> and slawonian grebe <i>Podiceps auratus</i> as well as an assemblage of other waterfowl including black-tailed godwit <i>Limosa limosa</i>, dark-bellied Brent goose <i>Branta bernicla</i>, dunlin <i>Calidris alpina</i>, lapwing <i>Vanellus vanellus</i>, grey plover <i>Pluvialis squatarola</i> and oystercatcher <i>Haematopus ostralegus</i>.</p>	International
Sites of Special Scientific Interest (SSSI)	<p>Bonhay Road Cutting SSSI</p> <p>Located approximately 0.8 km north-east of the site. Designated as a SSSI for its geological features of interest.</p>	National
	<p>Exe Estuary SSSI Impact Zone</p> <p>The site is situated within the Exe Estuary SSSI impact zone, and the categories that have been identified as potentially causing a risk to the SSSI include industrial/infrastructure proposals such as aviation sites, large solar schemes, large rural developments, large rural non-residential developments, residential developments resulting in a net gain in residential units, industrial development resulting in air pollution or combustion processes, landfill or proposals resulting in significant water discharge to ground or surface water, and large-scale composting.</p>	National
Local Nature Reserve	<p>Barely Valley LNR</p> <p>Located approximately 1.6 km north-west from the site boundary, which is designated for its common lizards <i>Zootoca vivipara</i> and large collection of different butterfly species.</p>	National



County Wildlife Sites (CWS)	Three County Wildlife Sites are located within the survey area. The closest of which is Cricklepit Lane & Quay Lane CWS located approximately 0.3 km north of the site boundary, designated as an area of particular botanical interest.	County
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Habitats and Flora

2.4 Habitats present within the site, along with their ecological importance (CIEEM, 2019) are detailed in **Table 2.2** and shown on **Plan 14769/P02a**.

Table 2.2: Habitat Features

Habitat	Description	Importance
Buildings and Hardstanding	<p>The majority of the site is covered by a large hardstanding carpark, and a single large building (B1) that is separated internally into three different units (U1, U2 and U3). All three units comprise brick built structures with corrugated metal roofs and plastic skylights throughout. Several large circular windows are present at the front and rear of U1, along with metal cladding above the entry and exit doors.</p> <p>The rear of the building is clad in corrugated metal that extends halfway down the walls from the rooftop.</p> <p>U1 is in use as a storage unit for the Range retailer and is in constant use.</p> <p>U2 comprised a Matalan retail unit that was not in use at the time of survey.</p> <p>U3 comprises a Tenpin bowling alley and arcade which is in constant use.</p>	Negligible
Introduced Shrub	<p>The entirety of the carparking area and the south-western boundary of the site is lined by introduced shrub planting. At the time of survey, these areas were managed down to approximately 40cm in height and largely in poor condition with many gaps present and areas of bare ground visible.</p> <p>The species present in these areas predominantly comprises cotoneaster <i>Cotoneaster sp.</i> and cherry laurel <i>Prunus laurocerasus</i>, as well as ivy <i>Hedera helix</i> present in places around the bases of plants in several areas.</p>	Site
Trees	<p>A mixture of native trees are planted around the boundaries of the site, within the areas of introduced shrub. The species present include Norway Maple <i>Acer platanoides</i>, sycamore maple <i>Acer pseudoplatanus</i>, whitebeam <i>Sorbus aria</i> and London plane <i>Platanus x acerifolia</i>.</p> <p>In addition, three London plane trees are planted in a line that runs through the middle of the main carparking area.</p>	Local

Protected and Priority Fauna

2.5 Details of protected and priority species using the site are described in **Table 2.3** on the page below and should be read in conjunction with **Plan 14769/P02a**.



Table 2.3: Protected and Priority Fauna

Fauna	Data Search	Site Survey	Importance
Amphibians	<p>DBRC holds records of two records of amphibians which were of palmate newts <i>Lissotriton helveticus</i> of which the nearest was 0.4 km from the site boundary and the most recent was in 2017.</p> <p>The site is within the Devon Great Crested Newt (GCN) consultation zone which comprises 5km zone around known GCN records which have been designed to inform whether any development impacts could be caused to GCN (Natural Devon, 2016).</p> <p>The DBRC do not hold any records of GCN within the 1km study area surrounding the site.</p>	<p>No ponds are present on or within 500m the site boundaries.</p> <p>In addition, the terrestrial habitats on site do not offer any suitable habitat for amphibians and given the lack of aquatic habitat within the site and surrounding area, the presence of substantial dispersal barriers such as roads and garden fences, the site is considered to be unlikely to support GCN or any other amphibian species.</p> <p>As such this species group is not considered further within the assessment.</p>	N/A
Badgers	<p>DBRC holds one record of Eurasian badger <i>Meles meles</i> within the study area. The closest of which was recorded c. 0.9 km from the site in 2012.</p>	<p>The site is considered largely unsuitable for badger, with the main habitats comprising hardstanding and buildings.</p> <p>The marginal shrub could offer some suitable foraging habitat for badger, although these areas are limited in their extent and isolated.</p> <p>No evidence of badgers or their setts were observed during the Phase 1 survey.</p>	Negligible
Bats	<p>DBRC holds the records of nine species of bat, these include common pipistrelle <i>Pipistrellus pipistrellus</i>, soprano pipistrelle <i>Pipistrellus pygmaeus</i>, noctule <i>Nyctalus noctule</i>, Natterer's bat <i>Myotis nattereri</i>, brown long-eared <i>Plecotus auritus</i>, greater horseshoe <i>Rhinolophus ferrumequinum</i> lesser horseshoe <i>Rhinolophus hipposideros</i>, and barbastelle <i>Barbastella barbastellus</i>.</p> <p>DBRC also holds records of unspecified myotis <i>Myotis</i> sp. bats, long-eared <i>Plecotus</i> sp. Bats, pipistrelle <i>Pipistrellus</i> bats, along with three counts of unidentified bats.</p> <p>The closest record to the site is that of an unspecified pipistrelle bat recorded c. 0.3 km from the site in 2017.</p>	<p>Opportunities for bats at the site are largely limited owing to the urban nature of the site, lack of connectivity and extent of artificial light surrounding the site.</p> <p>The existing building, comprising U1, U2 and U3, was considered to offer negligible bat roosting potential, owing to the lack of a loft void and lack visible gaps, openings or crevices observed during the survey.</p> <p>In addition, the internal building inspection found no evidence of roosting bats within any of the buildings.</p> <p>The trees on site were also considered to offer negligible potential for roosting bats, as no obvious roosting features, such as rot holes or dead limbs were observed.</p> <p>There are also limited habitats which could support foraging or commuting bats within the site. It is assumed that light tolerant species, such as common pipistrelle, could forage within and adjacent to the site.</p>	Negligible
Birds	<p>DBRC holds extensive bird records within the study area. Those of relevance to the habitats within the site include the mistle thrush <i>Turdus viscivorus</i>, song thrush <i>Turdus philomelos</i>, house sparrow <i>Passer domesticus</i>, common bullfinch <i>Phyrrhula pyrrhula</i> and spotted flycatcher <i>Muscicapa striata</i>. None of the records held by DBRC are located within the site boundary.</p>	<p>The trees and introduced shrub on site could potentially support foraging and nesting urban species such as blackbird <i>Turdus merula</i> and other woodland birds, however it is unlikely that the resources available on site are significant in maintaining the local population.</p> <p>Pigeons <i>Columba livia domestica</i> were observed nesting on the rooftops of the building on site, and within the guttering that runs around the edge of the building.</p>	Negligible
Dormice	<p>DBRC does not hold any records of dormice within the study area.</p>	<p>There are no habitats suitable for hazel dormouse within the site. Furthermore there is no connecting habitat (such as hedgerows) for dormice to utilise within the local area. As such this species is deemed to be absent from the site and is not considered further within the assessment.</p>	N/A
Invertebrates	<p>The DBRC holds extensive invertebrate records within the study area, however non were returned within the site boundary. The nearest species of note to the site boundary is that of an individual mottled rustic <i>Caradrina morpheus</i>, recorded c. 900m north-east of the site in 2014.</p>	<p>Only limited patches of suitable invertebrate habitat, comprising the introduced shrub is present around the periphery of the site.</p>	Negligible



Plants	The DBRC holds substantial records of notable plant species within the study area, however none were recorded within the site boundary. One species of Schedule 9 plants were recorded in the study area, which were five counts of Japanese knotweed <i>Fallopia japonica</i> , the closest of which was recorded 0.3 km away in 2016, which the most recent record 0.8 km away in 2017. No records of Schedule 9 species were recorded on site.	No notable or Schedule 9 species were present on site.	N/A
Reptiles	One species of reptile was recorded within the study area, which was one record of a slow-worm <i>Anguis fragilis</i> , located 1.0 km from the site and was recorded in 2014.	Only very small and limited patches of suitable reptile habitat were present around the periphery of the site, namely the introduced shrub, and none were observed during the Phase 1 survey. As such the presence of reptiles on site is discounted and this species is not considered further within the assessment.	Negligible
Other species	DBRC holds the record of four other notable species within the study area, these include 13 counts of otter <i>Lutra lutra</i> and 6 counts of hedgehog <i>Erinaceus europaeus</i> . The closest record to the site was that of an otter within the River Exe c.0.2 km from the site in 2019.	No evidence of other notable species was recorded during the Phase 1 survey.	Negligible



Section 3: Potential Impacts, Mitigation and Enhancement

- 3.1. The proposals require the demolition of the existing building on site and are predominantly located on hardstanding and the within the footprint of the existing building, which is of negligible ecological importance. To facilitate the development, sections of the existing introduced shrub and most trees are to be lost.
- 3.2. Specific measures will be undertaken to compensate and mitigate any loss of habitats and impacts that occur, to ensure opportunities for wildlife are provided for the long-term, biodiversity increases, and an overall ecological enhancement occurs. By providing appropriate compensatory planting to replace any losses and creating new habitats that are not currently present at the site, such as new native tree planting, amenity grassland, areas of neutral grassland and introduced shrub planting, an overall net gain in biodiversity can be achieved and opportunities for protected species enhanced (see **Plan 14769/P03a** and **Appendix 3**).

Potential Impacts and Requirement for Mitigation

- 3.3. Both the Countryside and Rights of Way (CRoW) Act 2000 and the Natural Environment and Rural Communities (NERC) Act 2006 give the importance of conserving biodiversity a statutory basis, requiring government departments (which includes Local Planning Authorities) to have regard for biodiversity in carrying out their obligations (which includes determination of planning applications) and to take positive steps to further the conservation of listed species and habitats. These articles of legislation require Exeter City Council to take measures to protect species or habitats from the adverse effects of development, where appropriate, by using planning conditions or obligations.
- 3.4. Where there are potential impacts in the construction and/or operational phases of the development to the ecological resources described and evaluated in Section 3, these are described below. Where potential impacts would cause a breach in legislation or planning policy (as set out in **Appendix 1**), the requirement for mitigation is noted.
- 3.5. The mitigation and enhancement strategy would be controlled through the provision of:
 - A Construction Environmental Management Plan (CEMP) BS42020:2013, which will set out the measures to protect off-site receptors through appropriate fencing and site best practice to avoid impacts to off-site receptors, such as from contaminated run-off; and
 - The implementation of a Landscape and Ecological Management Plan (LEMP) BS42020:2013, to maximise the biodiversity potential of retained and new habitats. Also included would be mechanisms to modify the management prescriptions, if required.



Designated Sites

Statutory Sites

- 3.6. No statutory designated sites are located within or adjacent to the site boundary. One European statutory site is located in the study area, comprising of the Exe Estuary SPA and Ramsar located approximately 3.1km west.
- 3.7. The Exe Estuary SPA and Ramsar is identified as being vulnerable to outdoor sports and leisure activities, recreational activities, modification of cultivation practices and changes in biotic and abiotic conditions (JNCC, 2016).
- 3.8. This designated site is separated from the site by existing built development, roads and open countryside, which limits any potential impacts. However, given the site's proximity to the River Exe, approximately c.100m north-east of the site, there is the potential for impacts, such as from run-off, during the construction phase of the development. With this in mind, standard construction safeguards will take place during the construction phase, such as those in relation to noise, vibration, dust and contaminated run-off, with further detail to be provided within a CEMP. These measures will ensure no impacts occur to any adjacent habitats or protected sites in the study area.
- 3.9. Owing to the potential hydrological link between the site and the protected sites, construction would be undertaken in accordance with CIRIA good practice guidance (Masters-Williams *et al*, 2001), to protect adjacent habitats. Where appropriate, method statements would be produced for high-risk activities, such as refuelling and use of concrete.
- 3.10. Dust created during construction is generally considered to only have a significant impact within 20 metres where heavy soiling of vegetation can occur (Holman *et al*/2014) and as such given the distances involved, dust is not considered to be a significant issue with regards any of the protected sites within the study area. In addition, the measures detailed above with regards to run-off will also help to minimise airborne dust levels.
- 3.11. Any potential adverse effects from noise and vibration will be mitigated through standard engineering practice, adhering to current guidance and legislation, and given the distances involved no impacts as a result of noise will occur at any of these sites.
- 3.12. The development will not result in any changes to cultivation at this protected site and as such no impacts via this pathway will occur.
- 3.13. In terms of potential recreational impacts, the site is within 10km of the Exe Estuary SPA and as such it has been identified that any new residential development within this zone would be required to pay a habitats mitigation contribution to offset any potential recreational impacts on this European designated site. Where developments provide Community Infrastructure Levy (CIL) payments, no additional habitat mitigation contribution payments are required¹. As such, with the adoption of the CIL payments as part of the proposals, there will be no likely impacts as a consequence of the proposed development, either alone or in combination with any other plan or project.

¹ <https://exeter.gov.uk/planning-services/payments-from-developers/habitats-mitigation/habitats-mitigation-collection-process/>



Impact Risk Zones

- 3.14. The site is located within the Impact Risk Zone (IRZ) for the Exe Estuary SSSI, which is part of the Exe Estuary SPA and Ramsar. As identified on MAGIC, the site is covered by the risk factor area which requires the LPA to consult with Natural England with regard to industrial/infrastructure proposals such as aviation sites, large solar schemes, large rural developments, large rural non-residential developments, residential developments resulting in a net gain in residential units, industrial development resulting in air pollution or combustion processes, landfill or proposals resulting in significant water discharge to ground or surface water, and large-scale composting. In this instance, the development meets the potential risk associated with a net gain in residential units. However, through the CIL payment, as above, the potential impact can be offset, resulting in no impact to the SSSI as a result of the development.

Non-statutory sites

- 3.15. No non-statutory designated sites are located within the site boundary, with the closest, Exeter Canal CWS, located approximately c.200m north. This CWS is separated from the site by residential areas and the River Exe. Due to the distance of the site from this and the other non-statutory designated sites of nature conservation importance, there are unlikely to be impacts as a result of the proposed development. Furthermore, the measures detailed to prevent impacts occurring during construction, such as from run-off, dust and noise will also ensure that no impacts occur to any non-statutory designated sites.
- 3.16. As such, the proposed development would be in line with relevant legislation and planning policy regarding designated sites.

Habitats

- 3.17. The site in its current state is nearly totally devoid of natural habitat, with only a very small section of introduced shrub and trees providing any suitable habitat for wildlife. As a result, there is significant potential to enhance the site for wildlife post-development through the creation of suitable habitat of known value to wildlife that is not available on site currently.
- 3.18. The proposed habitat creation includes the planting of new trees, areas of amenity grassland and neutral grassland, introduced shrub planting and green roofs (see **Plan 14769/P03a**).
- 3.19. New tree planting that will comprise both introduced and native species and those species of known wildlife importance, is proposed across the site, increasing species diversity and providing enhanced opportunities and connectivity for wildlife, such as bats and birds, through the site.
- 3.20. The retained trees could, however, be affected during construction by accidental damage including root compaction. As such, they would be fenced and protected during construction in accordance with best practise guidance detailed in BS 5837:2012 'Trees in relation to design, demolition and construction' (British Standard, 2012) to reduce potential impacts and accidental damage.
- 3.21. Areas of new neutral grassland and modified grassland in conjunction with introduced shrub planting will create a green corridor through the centre of the site and will provide foraging, refugia and nesting opportunities for a range of wildlife, including birds and invertebrates.



- 3.22. In order to maximise opportunities for wildlife, the areas of new introduced shrub planting have been located in close proximity to each other, to create a connected mosaic of habitats. This will create a significant ecological enhancement compared to the existing patchy shrub.
- 3.23. All newly created habitats will be subject to specific management measures with the aim of maximising their potential for wildlife and their biodiversity importance, with further detail to be provided within a LEMP.
- 3.24. Overall, the measures detailed above will compensate for any losses that occur and will assist with creating a net gain in biodiversity post development (see Tyler Grange **Report 14769/R02b** for BNG details).

Protected and Priority Fauna

Badger

- 3.25. No evidence of badgers or their setts was recorded during the Phase 1 survey, however they have been previously recorded within the local area, as shown in the DBRC desk study.
- 3.26. Due to the dynamic nature of badgers which can result in new setts being created, in the event that any setts are created on site in the interim period and could be impacted upon by the proposals, either directly or indirectly, a mitigation strategy would be devised prior to the commencement of works, and if necessary, a licence obtained from Natural England. It should be noted that licences are not generally granted between December and June inclusive to avoid disruption to the badger breeding cycle.
- 3.27. As badgers could be present in the area, protection measures for badger will be undertaken prior to and during construction. Such measures will include briefing all contractors working on the site regarding the potential presence of badgers and any trenches or deep pits that are to be left open overnight will be covered or provided with a means of escape should a badger enter, such as a roughened plank of wood placed in the trench as a ramp to the surface. This will also avoid impacts to any other small or medium sized mammals.
- 3.28. The storage of topsoil or other 'soft' building materials on site should be given careful consideration. Badgers will readily adopt such mounds as setts, which would then be afforded the same protection as established setts. Such mounds will be regularly inspected to check for use by badgers throughout the construction period.
- 3.29. Overall new opportunities for badgers will be created within the site and connectivity to suitable habitat in the wider area is to be improved.

Bats

- 3.30. All buildings and trees on site were considered to offer negligible potential for roosting bats, following the internal and external inspections.
- 3.31. While several potential roosting features were observed on B1, these were deemed to be negligible owing to the urban surroundings of the site and level of artificial lighting present as a result. As a precautionary measure, the building on site (comprising U1, U2 and U3) should be demolished under the supervision of a suitably qualified ecologist. If a bat or evidence of a bat roost is recorded



during the demolition process, then all work will stop, and a Natural England licence applied for and suitable mitigation implemented.

- 3.32. Post-development, new tree and shrub planting within the site will significantly enhance foraging and commuting opportunities for bats in parts of the site post-development.
- 3.33. The management of the areas of new planting, with further detail to be provided within a LEMP, will also help to enhance opportunities for bats by improving the quality of habitats and connectivity within the site and to the wider area.
- 3.34. Enhanced roosting opportunities for bats are to be created through the provision of five bat bricks (such as Vivara Pro or similar) within new buildings. All such features would be positioned so as to provide easy access to linear features on the site boundary and the wider area.
- 3.35. Lighting within the site will be designed to minimise disturbance of bats and their roosts. This would be achieved by using the following design measures to reduce light spill where appropriate (ILP, 2018):
- The use of luminaires that lack UV elements;
 - LED luminaires should be used where possible due to their sharp cut-off, lower intensity, good colour rendition and dimming capability;
 - A warm white spectrum (ideally <2700Kelvin) should be adopted, and luminaires should feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats;
 - Internal luminaires should be recessed in proximity to windows to reduce light spill;
 - The use of specialist bollard or low-level downward luminaires to retain darkness above can be considered as directed by a lighting professional;
 - Column heights should be carefully considered to minimise light spill;
 - Only luminaires with an upward light ratio of 0% and with good optical control should be used;
 - Luminaires should always be mounted on the horizontal, i.e. no upward tilt;
 - Any external security lighting should be set on motion-sensors and short (1min) timers; and
 - As a last resort, accessories such as baffles, hoods or louvres can be used to reduce light spill and direct it only to where it is needed.
- 3.36. Overall, the measures undertaken will enhance foraging and commuting opportunities for bats, will create additional features of importance post-development (new habitats such as trees and shrub, as well as bat bricks), creating an enhancement for bats post-development.

Birds

- 3.37. All wild birds, their nests and eggs are afforded protection under the Wildlife and Countryside Act (WCA) 1981 (as amended). In order to avoid a breach in the legislation, removal of buildings and vegetation, should be undertaken outside the nesting bird season (March to August inclusive), although the nesting birds season is not defined in law and some species may nest all year round.
- 3.38. Should this not be possible, a thorough search of the vegetation and buildings would need to be completed by an Ecological Clerk of Works (ECoW) immediately prior to demolition, to check for signs of active bird nests. If an active nest is found to be present, an appropriate buffer will need



to be retained until the young have fledged and the nest is no longer active, as confirmed by an ECoW.

- 3.39. The creation of shrub and trees will provide an increase in the overall habitat available for nesting birds on site, given the very limited suitable habitat currently available. As such any bird species that may be present are likely to continue to use the site post-development.
- 3.40. The recommended planting would increase the overall habitat available for nesting and foraging birds. As such the majority of bird species anticipated to be present would likely continue to use the site post-development. The improved habitats will provide increased foraging opportunities and may attract an increased species complement compared to existing habitats.
- 3.41. There may, however, be some partial displacement though this is considered to be insignificant especially given the extent of suitable habitat in the wider area that will remain unaffected by the proposals.
- 3.42. To create a further enhancement for birds and in accordance with the South and South-West Exeter Residential Design Guide SPD (Exeter City Council, 2010) nesting opportunities for birds would be created through the provision of nest boxes incorporated into the new buildings, with such features positioned so as to provide easy access to linear features or grouped as some bird species prefer. This should include six swift boxes / bricks (Vivara Pro or similar) on the northern elevation, at least five metres from ground level and not over any windows.
- 3.43. Overall, it is considered that the measures detailed would maintain and improve nesting and foraging opportunities for birds, creating an enhancement post-development.

Invertebrates

- 3.44. The proposals will see the loss of introduced shrub during construction that may be of some value to invertebrates, however the proposed tree, wildflower grassland and introduced shrub planting on site will provision invertebrates with new areas valuable habitat that is not currently present on site, which will also benefit small mammals, amphibians and reptiles.

Other Species

- 3.45. Regard will be had for any other protected or notable species that may be present within the site and in particular hedgehog, a UK Priority Species, which could be affected during the construction phase, if present. Prior to any site clearance work, any obvious piles of leaves or brash will be cleared by hand and should any hedgehogs be found, they will be carefully moved to other areas of suitable habitat, away from the proposed development.
- 3.46. The areas of new planting and habitat creation, will assist with providing increased opportunities for a variety of wildlife, creating overall ecological enhancements and gains in biodiversity.



Section 4: Conclusions and Mechanisms for Delivery

- 4.1. With the implementation of the mitigation and enhancement strategy described above, the proposed development would be in conformity with relevant planning policy and legislation (see **Appendix 1**).
- 4.2. The mitigation and enhancement strategy could be controlled by appropriately worded planning controls devised to:
 - Secure a mitigation strategy, including a CEMP (BS42020:2013), to avoid impacts to designated sites, adjacent habitats of importance, badgers, bats, breeding birds, and hedgehog; and
 - Secure an appropriate landscape design and LEMP (BS42020:2013) to maximise biodiversity benefit of retained and newly created habitats in the long term, to include a suitable lighting design, to minimise potential disturbance to wildlife.



References

CIEEM (2019) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Chartered Institute of Ecology and Environmental Management, Winchester

Exeter City Council (2010). Residential Design Guide SPD. Available online at: <https://exeter.gov.uk/planning-services/planning-policy/supplementary-planning-documents-and-planning-statements/residential-design-guide-spd/>. Accessed 15/06/2022.

Holman et al (2014). IAQM Guidance on the assessment of dust from demolition and construction, Institute of Air Quality Management, London. www.iaqm.co.uk/text/guidance/construction-dust-2014.pdf.

Institute of Lighting Professionals (ILP) (2018) Guidance Note 08/18: Bats and Artificial Lighting in the UK: Bats and the Built Environment. Available online at [<https://www.theilp.org.uk/documents/guidance-note-8-bats-and-artificial-lighting/>] Accessed 15/06/2022.

Joint Nature Conservation Committee (JNCC) (2010). Handbook for Phase 1 habitat survey - a technique for environmental audit. JNCC, Peterborough

JNCC (2016) Natura 2000 - Standard Data Form: Exe Estuaries. Available online at [<http://jncc.defra.gov.uk/pdf/SPA/UK9010081.pdf>] Accessed 15/06/2022.

Multi-Agency Geographic Information for the Countryside (MAGIC) Interactive maps, available online at: <https://magic.defra.gov.uk/MagicMap.aspx>.

The UK Habitat Classification Working Group (2018). UK Habitat Classification – Habitat Definitions V1.0.



Appendix 1: Legislation and Planning Policy Context

Legislative Context

- A1.1. Specific habitats and species receive legal protection in the UK under various pieces of legislation, including:
- The Wildlife and Countryside Act (WCA) 1981 (as amended);
 - The Conservation of Habitats and Species Regulations 2010 (as amended);
 - The Countryside and Rights of Way (CRoW) Act 2000;
 - The Hedgerows Regulations 1997;
 - The Protection of Badgers Act 1992; and
 - The Natural Environment and Rural Communities Act (NERC) 2006.
- A1.2. The European Council Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna, 1992, often referred to as the 'Habitats Directive', provides for the protection of key habitats and species considered of European importance. Annexes II and IV of the Directive list all species considered of community interest. The legal framework to protect the species covered by the Habitats Directive has been enacted under UK law through The Conservation of Habitats and Species Regulations 2010 (as amended).
- A1.3. In Britain, the WCA 1981 (as amended) is the primary legislation protecting habitats and species. SSSIs, representing the best examples of our natural heritage, are notified under the WCA 1981 (as amended) by reason of their flora, fauna, geology or other features. All breeding birds, their nests, eggs and young are protected under the Act, which makes it illegal to knowingly destroy or disturb the nest site during nesting season. Schedules 1, 5 and 8 afford protection to individual birds, other animals and plants.
- A1.4. The CRoW Act 2000 strengthens the species enforcement provisions of the WCA 1981 (as amended) and makes it an offence to 'recklessly' disturb a protected animal whilst it is using a place of rest or shelter or breeding/nest site.

Species and Habitats of Principal Importance and the UK Biodiversity Action Plan

- A1.5. The UK Post-2010 Biodiversity Framework succeeded the UK BAP partnership in 2011 and covers the period 2011 to 2020. However, the lists of UK Priority Species and Habitats agreed under the UKBAP still form the basis of much biodiversity work in the UK. The current strategy for England is 'Biodiversity 2020: A Strategy for England's wildlife and ecosystem services' published under the UK Post-2010 UK Biodiversity Framework. Although the UK BAP has been succeeded, Species Action Plans (SAPs) developed for the UK BAP remain valuable resources for background information on UK Priority Species under the UK Post-2010 Biodiversity Framework.
- A1.6. UK Priority Species and Habitats identified under the UKBAP are also referred to as Species and Habitats of Principal Importance for the conservation of biodiversity in England and Wales within Sections 41 (England) and 42 (Wales) of the Natural Environment and Rural Communities (NERC)



Act 2006. The commitment to preserving, restoring or enhancing biodiversity is further emphasised for England and Wales in Section 40 of the NERC Act 2006.

National Planning Policy

National Planning Policy Framework (NPPF), July 2021

- A1.7. The National Planning Policy Framework (NPPF) was published in July 2021 and sets out the Government's planning policies for England and how these should be applied. It replaces the National Planning Policy Framework published in February 2019.
- A1.8. Paragraph 11 states that:
- "Plans and decisions should apply a presumption in favour of sustainable development."*
- A1.9. Section 15 of the NPPF (paragraphs 174 to 182) considers the conservation and enhancement of the natural environment.
- A1.10. Paragraph 174 states that planning and decisions should contribute to and enhance the natural and local environment by:
- "protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
 - recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and
 - minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures"
- A1.11. Paragraph 175 states that plans should distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.
- A1.12. Paragraph 179 states that in order to protect and enhance biodiversity and geodiversity, plans should:
- "Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
 - promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."



- A1.13. When determining planning applications, Paragraph 180 states that local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:
- a) "if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
 - b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
 - c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁵⁸ and a suitable compensation strategy exists; and
 - d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity."
- A1.14. As stated in paragraph 181 the following should be given the same protection as habitats sites:
- a) "potential Special Protection Areas and possible Special Areas of Conservation;
 - b) listed or proposed Ramsar sites; and
 - c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites."
- A1.15. Paragraph 182 states that the presumption in favour of sustainable development does not apply where development requiring appropriate assessment because of its potential impact on a habitats site is being planned or determined.
- A1.16. Office of the Deputy Prime Minister (ODPM) Circular 06/2005: Biodiversity and Geological Conservation - Statutory Obligations and their Impact within the Planning System
- A1.17. ODPM Circular 06/05 was prepared to accompany PPS9, however continues to be valid, and material in the consideration of planning applications since PPS9's replacement by the NPPF.
- A1.18. ODPM Circular 06/05 provides guidance on applying legislation in relation to nature conservation and planning in England. Part I considers the legal protection and conservation of internationally designated sites (namely Special Areas of Conservation (SACs), potential Special Protection Areas (pSPAs), SPAs and Ramsar sites) and Part II considers the legal protection and conservation of nationally designated sites, namely Sites of Special Scientific Interest (SSSIs).
- A1.19. Part III considers the protection of habitats and species outside of designated areas (particularly UK Biodiversity Action Plan species and habitats, which it states are capable of being a material



consideration in the preparation of local development documents and the making of planning decisions.

A1.20. Part IV considers species protected by law and states that the presence of a protected species is a material consideration in the consideration of a development proposal that, if carried out, would be likely to result in harm to the species or its habitat and that it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted

Local Planning Policy

A1.21. The site is located within the area of Exeter City Council.

Exeter City Council: Core Strategy (Adopted February 2012)

A1.22. *CP11: Development should be located and designed so as to minimise and if necessary, mitigate against environmental impacts.*

A1.23. *CP16: The strategic green infrastructure (GI) network is shown on the key diagram. The Exeter GI network has been identified to protect and enhance current environmental assets and local identity and to provide a framework for sustainable new development.*

A1.24. *GI will be an integral part of planning for the urban extensions at Monkerton/Hill Barton, Newcourt and Alphington. New multifunctional areas of green space and green corridors will be created to meet the needs of these new communities. A sustainable movement network will link the urban area to the urban extensions and beyond to the open countryside. To the east of the city green corridors, that incorporate multi-use trails (for cycling, walking and horse riding) and provide high quality biodiversity habitat, will link Exeter to the proposed Clyst Valley Park and on to Cranbrook.*

A1.25. *The character and local distinctiveness of the areas identified below, will be protected and proposals for landscape, recreation, biodiversity and educational enhancement brought forward, in accordance with guidance in the Green Infrastructure Strategy, through the Development Management DPD:*

- *the hills to the north and north west;*
- *Knowle Hill to the south west;*
- *the strategic gap between Topsham and Exeter;*
- *and the Valley Parks: Riverside, Duryard, Mincinglake, Ludwell, Alphington to Whitestone Cross, Savoy Hill and Hoopern.*

A1.26. *The Exe Estuary European Site will be protected. Development that is likely to have a significant effect on the integrity of the Exe Estuary, East Devon Pebblebed Heaths/East Devon Heaths or Dawlish Warren European sites will be subject to the Habitats Regulations 2010 and the requirement East therein to undertake a Habitat Regulations Assessment. Contributions will be sought from new development towards management and other measures at the Exe Estuary, Dawlish Warren and Pebblebed Heaths and at other European sites as may be justified by the emerging evidence base.*



- A1.27. *The biodiversity value of Stoke Woods and Bonhay Road cutting SSSI, and all other sites of national, regional and local conservation importance will be protected, and unavoidable impacts mitigated and compensated for, in accordance with their relative status.*
- A1.28. *Biodiversity enhancement areas, for the restoration or creation of new priority habitats, will be identified within the strategic nature areas to the north of the city and in other areas of biodiversity and geological interest. Proposals for these areas will be brought forward through the Development Management DPD.*
- A1.29. *Opportunities to provide green corridors, open space and allotments, to enhance cycling and walking opportunities, to link existing habitats, to incorporate environmental assets and to integrate biodiversity, proposed by the Exeter Green Infrastructure Strategy, will be secured through partnership working, direct implementation and the application of Policy CP18 (see Section 11).*



Appendix 2: Methodology

A2.1. Tyler Grange completed the following surveys at the site in 2021 and the methodologies for these are provided below:

- Full desk study and records search;
- Phase 1 habitat survey; and
- Building in section and Preliminary Bat Roost Assessment (PBRA).

Data Search

A2.2. The aim of the data search is to collate existing ecological records for the site and adjacent areas. Obtaining existing records is an important part of the assessment process as it provides information on issues that may not be apparent during a single survey, which by its nature provides only a 'snapshot' of the ecology of a given site.

A2.3. This data search covered the study area using the distances defined in the previous section. It was completed in April 2022 with the following organisations and resources contacted and consulted:

- Devon Biodiversity Records Centre (DBRC);
- Multi-Agency Geographic Information for the Countryside (MAGIC) Interactive Maps, for locations of statutory sites;
- Section 41 of the Natural Environment and Rural Communities (NERC) Act for Priority Species and habitats in England; and
- Exeter City Council website for details of relevant local planning policies and supplementary planning guidance.

A2.4. Information supplied by these organisations has, where relevant, been incorporated into this report.

Extended Phase I Survey

A2.5. An extended Phase I habitat survey of the site was undertaken in April 2022. The habitat survey methodology was based on guidance set out in the 'Handbook for Phase I habitat survey' (JNCC, 2010) and entailed recording the main plant species and classifying and mapping habitat types with reference to the Habitat Definitions provided by the UK Habitat Classification Working Group (2018).

A2.6. Note was taken of the more conspicuous fauna and any evidence of, or potential for the presence of protected or notable flora and fauna. Where access allowed, adjacent habitats were also considered in order to assess the site within the wider landscape and to provide information with which to assess possible impacts within the context of the site boundary.

Building Survey and PBRA

A2.7. A Preliminary Bat Roost Assessment (PBRA) of the buildings and trees present within the site was undertaken to assess their potential to support roosting bats. This survey was undertaken



alongside the 'extended' Phase I habitat survey. The surveys followed standard methodologies (Mitchell-Jones, A.J., 2004; Mitchell-Jones, A.J. and McLeish, A.P., 2004; Collins, 2016) which are described below.

A2.8. The PBRA for buildings comprised an external inspection of the buildings present on-site to assess its potential to support roosting bats. In summary, this required the following:

- A visual inspection of the exterior of the buildings on site was undertaken, examining features such as brickwork, lead flashing, and tiles for evidence of use by bats, including the presence of bat droppings and staining from fur-oil or urine;
- A visual inspection of the internal of the buildings (where access was possible) examining features such as brickwork and visual inspection of loft areas for evidence of use by bats, including the presence of bat droppings and staining from fur-oil or urine; and
- A number of factors were considered including the presence of features suitable for use by crevice dwelling bats, proximity to foraging habitats or cover, and potential for disturbance from lighting and other sources.

A2.9. The potential of the buildings and trees to support roosting bats has been categorised against the criteria described in **Table 2.1** below.

Table 2.1 – Roost Assessment Criteria (adapted from Collins, 2016).

Suitability	Description of Roosting Habitats
Negligible	Negligible habitat features on-site likely to be used by roosting bats.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e., unlikely to be suitable for maternity or hibernation). A tree of sufficient size and age to contain PRFs but with none seen from the ground or features seen with only very limited roosting potential.
Moderate	A structure or tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status.
High	A structure or tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection conditions and surrounding habitat.

Limitations

A2.10. The species data collated during the data search are only those records submitted to DBRC and therefore should not be taken as a definitive list of the protected and priority fauna to occur within the study area.

A2.11. It is considered that the Phase 1 habitat survey or PBRA was not subject to any limitations.



Appendix 3: Planning Layout

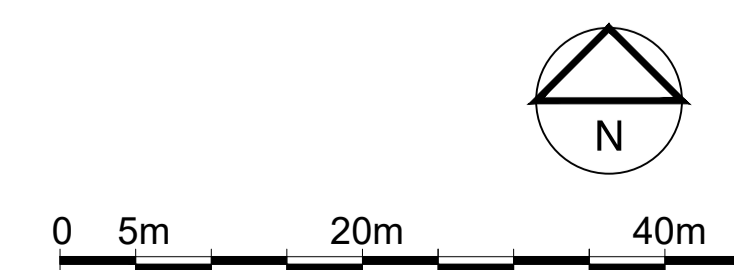




Rev	Comments	Date	Dr	Ch
P1	Work in Progress	16-01-2023	EL	AM
P2	Final Draft Issue	31-01-2023	EL	AM

- Existing tree removed
- Existing tree retained
- Proposed new tree
- Unit (1 Bed 2P - 50 sqm minimum)
- Unit (2 Bed 3P - 61 sqm minimum)
- Unit (2 Bed 4P - 70 sqm minimum)
- Unit (3 Bed 6P - 95 sqm minimum)
- Unit (Co-Living Small - 17sqm minimum)
- Unit (Co-Living Medium - 20sqm minimum)
- Unit (Co-Living Large - 25sqm minimum)
- Communal Resident's Lounge & Workspace
- Retail/ Cafe/ Restaurant
- Corridor / Circulation
- Communal Gym
- Cycle Store
- Service/BOH Function/ Bin Area
- Plant Rooms / Risers / Smoke Extract

PWA Code: 20021
 Notes: Use annotated dimensions only. All dimensions in millimeters unless otherwise stated. This drawing is to be read in conjunction with all other related material. Any discrepancies, conflicts or errors must be reported to Piper Whitlock Architecture before commencing work.



<p>Drawing Title: Proposed Site Layout Ground Floor Plan - 2023</p> <p>Client: Welbeck CP</p> <p>Project Ref: Orig: Zone: Lev: Type: Role: Num: Rev: HREXE -PWA-00 -00 -DR-A-0086 -P2</p> <p>Status: PRELIMINARY Stage: 3 Scale @ A1: 1:500</p>	<p>Project Name: Haven Banks, Exeter</p> <p> PIPER WHITLOCK</p> <p><small>©Piper Whitlock Architecture Ltd. 2nd Floor, Anglo St. James House, 39a Southgate Street, Winchester, Hampshire, SO23 9EH Tel: 01962 843586. Email: enquiries@piperwhitlock.co.uk, www.piperwhitlock.co.uk</small></p>
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Plans:

14769/P01a – Site Location and European Designated Sites

14769/P02a – Extended Phase 1 Habitat Survey

14769/P03a – Ecological Opportunities and Constraints Plan

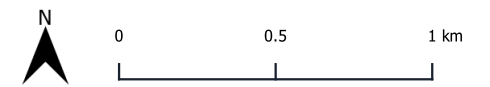




 Site Boundary

European Designated Sites

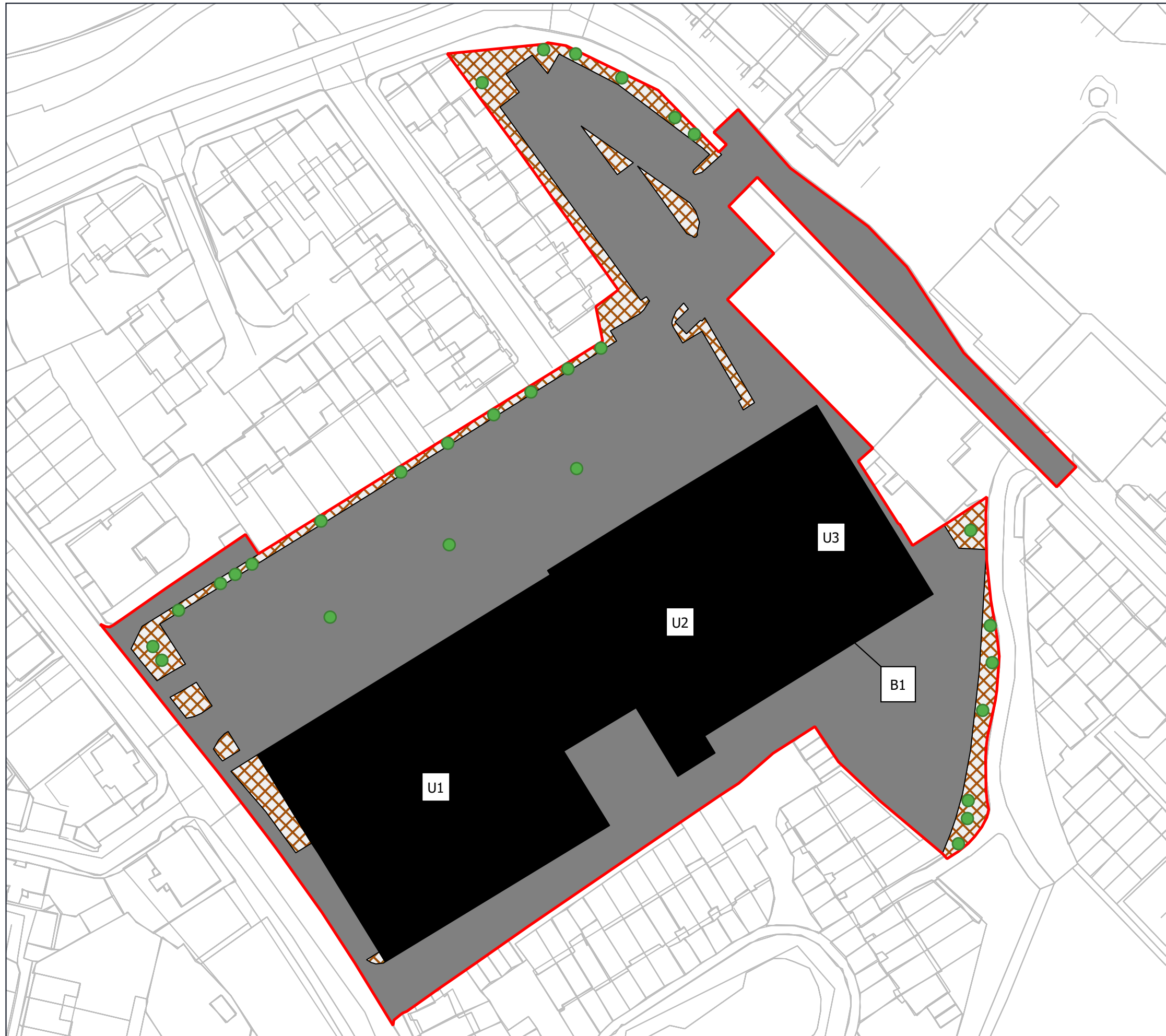
 Exe Estuary SPA and RAMSAR



Project	Haven Banks Retail Park, Exeter
Drawing Title	Site Location and European Designated Sites
Scale	As Shown (Approximate)
Drawing No.	14769/P01a
Date	February 2023
Checked	JS/RR



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- Site Boundary
- Habitats**
- Buildings
- Hardstanding
- Introduced Shrub
- Existing Trees



Project	Haven Banks Retail Park, Exeter
Drawing Title	Habitat Features
Scale	As Shown (Approximate)
Drawing No.	14769/P02a
Date	February 2023
Checked	JS/RR



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New planting of trees, ornamental shrubs and wildflower grassland will provide new nesting and foraging habitat available for breeding birds, as would the provision of nest boxes.

Opportunity to add new nesting potential for birds, providing an enhancement through the provision of six bird boxes / bricks positioned on the buildings.

To provide new opportunities for bats, it is recommended that five bat boxes / bricks be installed on the new buildings.

- Site Boundary
- ◆ Birds Bricks / Boxes (indicative location)
- Bat Bricks / Boxes (indicative location)



Project	Haven Banks Retail Park, Exeter
Drawing Title	Ecological Opportunities and Constraints
Scale	As Shown (Approximate)
Drawing No.	14769/P03a
Date	February 2023
Checked	JS/RR



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