From: Nikki Taylor (Ecologist - Place)
Sent: Wednesday, October 9, 2024 11:18 AM
To: Christopher Cummings
Subject: Planning ref: 24/0531/RES - Ecology comments

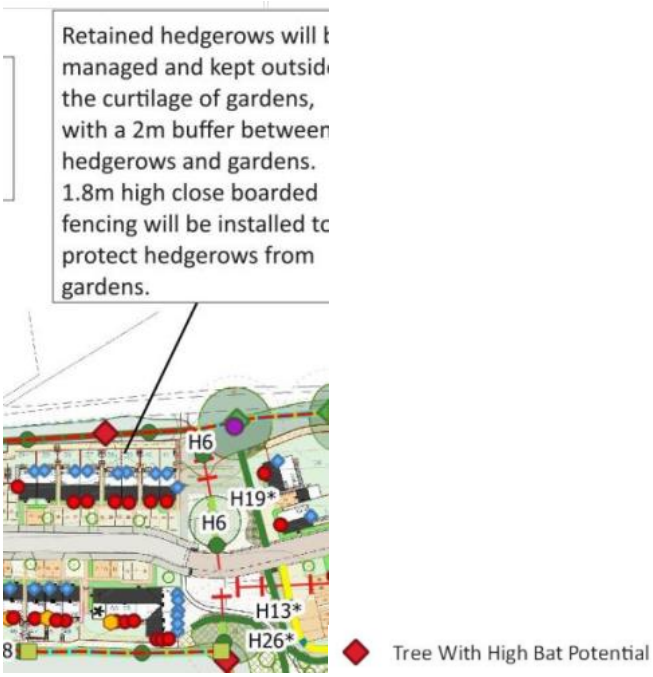
Dear Chris

Many thanks for the consultation. Having reviewed the relevant documents, I have set out my response on each point raised in the previous ecology officer comments below:

Summarised previous Ecology & Biodiversity Officer comments (undated)	**Updated ecology comments**
1. A minimum 5m buffer from the woodland edge to the back garden fences along the length of the southern boundary.	The revised information proposes a 2m buffer to the woodland. Whilst a 2m buffer may be acceptable for hedgerows it is usual to see a more substantial buffer to woodland. The previous planning authority ecology comment suggested a minimum of a 5m buffer from the woodland which is reasonable given the likely Root Protection Area of trees on the woodland edge and in light of guidance such as the Cornwall County Council planning guidance for biodiversity which stipulates a minimum 10m buffer to woodland is required. Furthermore, the proposed 2m buffer is compromised in two areas (of unspecified length) that will have no buffer described as 'pinch points' in the Ecological Mitigation and Enhancement Strategy (EMES) (GE Consulting, 2024). The bat activity surveys recorded a wide range of bat species, including some of the UK's rarest and most light sensitive species, using the site and its hedgerows. Many of which will be surrounded by development post construction and will be subject to a range of impacts associated with residential activity. This leaves the boundary features to mitigate these impacts on bat activity and ensure bats continue to use the site for foraging and commuting post development. The Devon technical guidance *Maintaining dark corridors through the landscape for bats* (Devon CC, 2022) states*: 'For major developments (which will generally have greater impacts on bat flight lines) there should be a minimum width of 10m of open grassy corridor maintained next to a natural linear feature such as a hedge, woodland edge, or vegetated watercourse.'* Bats that may be roosting in the adjacent woodland to the south currently are able to immediately access open countryside to the north. Post development, this will no longer be the case with the woodland effectively isolated by the development. Whilst the open space and SUDs area to the east of the woodland will provide some habitat, this is itself hemmed in by the new development to the north and the existing development to the east with the additional hedgerow loss (from that originally proposed at outline) acerbating the loss of commuting and connectivity provision. Therefore, the current ability for bats to move to feeding grounds in the open

	countryside to north from the woodland in the south will no longer exist post development and has not been mitigated for by such a limited 2m buffer on the development's southern boundary and no contiguous vegetated corridor running south-north from the woodland across the site. The EMES states that a '*New species-rich native hedgerow will be planted to the east of the existing eastern north-south hedgerow. The existing north-south hedgerow will be mostly removed except for hedgerow trees, but a further 30m hedgerow will be planted parallel to this hedgerow north of the access and 70m of native species-rich hedgerow to the south of the access (split across two hedgerows). This will provide continued north-south connectivity in this area of the Site.*' It is questionable however, that the replacement hedgerow, will replicate the ecological value and function of the existing north-south hedge in the eastern section of the site, described in the Ecological Impact Assessment (EcIA) report (GE Consulting 20210 as '*providing habitat connectivity between Exwick Lane to the area of woodland to the south of the Site. This habitat feature is likely to have some importance to the local bat population by providing a foraging and commuting resource*' and identified as being used by bats during surveys, when it will take many years to reach the same height and structure of the existing hedge; will be surrounded by residential development; subject to introduced artificial lighting, and dissected by an access road. It is notable that the EcIA report acknowledges that rare Annex II barbastelle bat recordings captured by the surveys are indicative that the site supports dispersing and transitioning barbastelle bats moving between roosts. Such sites are important in supporting local populations, particularly in the case of such rare species. The impacts from the development on this species and aspect of behaviour is not specifically considered, however, the report states that '*Maintenance of east-west connectivity has been noted as a key aim of the proposals as this will allow bats to move between potential roost sites to the north and east and areas of good foraging habitat to the west of the Site associated with the Nadder valley which includes riparian habitats, woodland and grasslands*'. However, this has not been carried forward to this application proposal whereby a compromised 2m buffer is considered insufficient to meet this key aim and mitigate the impacts from the development on bats. The EMES also states that **'***To compensate for the loss of 472m of hedgerow, 440m of new native species rich hedgerow and 190m of ornamental hedgerow will be planted, ensuring no net loss of hedgerows on Site'.* However, 190m of ornamental hedgerow is not considered appropriate for the loss of native hedgerows which are classed as a Priority Habitat. Furthermore, the ecological function of existing connected hedgerows cannot be replicated by smaller, disconnected hedges within the development. The proposed compensation planting for hedgerows does not represent like-for-like mitigation not to mention a measurable net gain (NPPF). As an

	absolute minimum, hedgerows should be replaced on a ratio of 2m for every linear metre lost to account for the time new habitats take to reach target condition and should be planted with standard trees every 20m. Hedges should be designed as substantial green corridors connected within the development and to the wider landscape and should be buffered by a minimum 2m either side, measured from the edge of the hedge. A useful guide can be read in the Dorset Biodiversity Appraisal Protocol. The justification given for the loss of hedgerows is the accommodation of footpaths, the road widening scheme and positioning of housing. Given the original indicative layout retained more hedgerows, it is difficult to see how hedgerows have been valued as Habitats of Principle Importance (section 41, NERC Act, 2006) in accordance with the Mitigation Hierarchy and government Planning Policy Guidance (*Protected species and development: advice for local planning authorities)* which states that when agreeing measures to avoid, mitigate or compensate (following the Mitigation Hierarchy (NPPF)) impacts, to avoid harming or disturbing protected species proposals could: • reduce the size of the development or alter its layout to retain the site's important habitat features The consented quantum of development is for up to 80 dwellings, it would be desirable and reasonable to see a more robust account of the application of the Mitigation Hierarchy, consideration given to a reduced number of dwellings and/or amendments to the general layout to avoid the loss of habitats that will impact upon protected species and will provide an adequate buffer to the woodland and maintain connectivity along boundaries and across the development.
2. A sensitive lighting strategy modelling lux levels in the vertical and horizontal plane from external and internal lighting along the southern boundary that demonstrates 0.5 lux or less is achieved along the corridor and 3. A sensitive lighting strategy modelling lux levels in the vertical and horizontal plane from external and internal lighting along Exwick that demonstrates 0.5 lux	Not provided to date. A pre-commencement condition requiring a lighting strategy that demonstrates impacts upon bats, and other nocturnal wildlife from artificial lighting will be mitigated, and meets the standards of the Devon technical guidance *Maintaining dark corridors through the landscape for bats* (Devon CC, 2022) is recommended.

or less is achieved along the corridor is required.	
4. Justification in accordance with the mitigation hierarchy in para 186 of the NPPF on hedgerow removal.	See comments at 1. Above.
5. Finer detail on the boundary treatment along retained hedgerows to provide additional assurance the hedgerows will be protected from degradation, especially along Exwick Lane.	See comments at 1. Above regarding a 2m buffer. In addition, along the boundary with Exwick Lane is a tree identified as holding high bat roosting potential which will be 2m from the boundary of residential curtilages:  It would be desirable to see a greater buffer for the tree taking account of the root protection zone (in-line with the BS5837), and to mitigate any external artificial lighting that residents may later install. Full boundary treatment details, mitigation and management prescriptions will need to be detailed within the Construction Environment Management Plan (CEMP) to satisfy Condition 9 of the consent and the Landscape and Ecological Management Plan (LEMP) (Condition 10 of the consented appeal), both of which form pre-commencement conditions.
6. Full specification (height, widths, and species mix) and management detail of the compensatory hedgerows to provide assurance that they will of sufficient quality to provide adequate compensation.	A full specification must be provided in a LEMP, 5. Above refers.

7. Detail on hedgerow translocations required.	Addressed in Appendix 4 of the EMES. The method statement will need to be included in the CEMP to satisfy Condition 9 of the consent. For the operational phase, hedgerow care and management will need to be specified in the LEMP to satisfy Condition 10 (see comments above).
8. Detailed dormouse mitigation strategy required to demonstrate the application will be licensable.	An outline method statement is included at Appendix 3 of the EMES. A full method statement will need to be included in the CEMP with features such as boxes and hedgerow care and management specified in the LEMP to discharge the relevant pre-commencement conditions.
Access Road / Redhills widening and lighting: 1. Bat surveys required along the road in order to undertake an impact assessment of the potential effect of lighting on light sensitive bats. 2. Concerns raised regarding the loss of interlocking tree canopies over Exwick. Its potential impact on the local dormouse population needs to be established and it needs to be considered in the design.	The submitted Ecology Addendum (GE Consulting, September 2024) sets out the additional bat activity surveys conducted to assess the potential impact from the road widening scheme. It concludes that the loss of habitats and light spill will have an adverse effect on a low number of rare and light sensitive bat species. With the proposed mitigation of a new hedgerow and woodland planting to the west of the scheme area, and the ground levels, it considers light spill will be limited and impacts from the loss of habitats limited to the period of hedgerow establishment. The report also points to habitats associated with the Nadder Brook to the west of Redhills as being of greater importance for bats currently using the corridor along the road and concludes further that no additional mitigation measures are required. Provided the concerns relating to continued ecological functioning of the development site from the loss of habitats, mainly hedgerows and the lack of adequate buffering and connectivity (see above comments), is addressed, nothing further is required on this point.

I hope this is of help, please do let me know if it would assist to discuss any of the above.
All best wishes
Nikki

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