Environmental Planning
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17th June 2021

Development Management Case Officer: Ursula Fay
Response to comments from Natural Environment Service Area
Application Reference Number: 20/P/2990/OUT
Application: Outline Planning Application for access with all other matters reserved for the erection of up to 71 no. dwellings, including 21 no. affordable housing unit (30%), along with access from Butts Batch, the provision of play facilities and public open space/ecological mitigation land, with

Dear Ursula,

This letter has been prepared to respond to the formal comments from Sarah Dale, Temporary Natural Environment Officer – Ecology regarding the above application (08/04/2021).

The following clarifications were requested:

1) **Shadow Habitats Regulations Assessment including HEP calculations to demonstrate no net loss of horseshoe habitat.**

A shadow HRA has been completed included HEP calculation to demonstrate no net loss of horsehoe habitat. Calculations for both GHS and LHS show that a net gain will be achieved with onsite habitat mitigation, creation and enhancement.

The HEP worksheets are provided.

2) **Survey information and/or ecological impact assessment relating to the drainage works in the southern field, including any impact on the River Yeo Local Wildlife Site and associated wildlife (e.g. hazel dormouse, tree roost for bats, otter and water vole).**

The drainage works will entail construction of an outfall pipe in the southern 'square' field parcel leading the river. The grassland habitat is modified grassland, of poor condition and unsuitable habitat for notable species. The boundary habitat to the River Yeo is very open on the north bank, with scattered mature trees, and bankside habitat dominated by tall ruderals.

A wider section has been allowed for in the planning application boundary, to enable avoidance of impacts to trees and other sensitive features. Given the openness of habitat, the layout will be adjusted appropriately to avoid biodiversity impacts; the detailed layout design could be secured by condition and/or provided at reserved matters stage with appropriate precautionary working method statements for (otter, water vole and dormouse) to ensure pre-works checks of bankside habitat are carried out to inform design layout and if necessary, precautionary working measures for construction.

Potential (temporary) impacts to the Congresbury Yeo adjacent Land and Rhynes Site of Nature Conservation Interest will be avoided through sensitive design that ensures no mature trees are impacted, and any vegetation clearance and/or bankside works are subject to a pre-works check and supervision if necessary. This can be secured by condition and/or at reserved matters stage, including a targeted CEMP to ensure good practice pollution control measures are implemented to avoid any pollution incidents that could potentially degrade the river water quality and/or associated bank habitat.

Potential (operation) impacts to the SNCI are avoided through the design strategy which includes SuDs to control surface water runoff to ensure the pre-development water characteristics remain unchanged overall or improved. Therefore, with drainage mitigation, no changes to water quality or water volume which could impact the designated site are predicted.

SuDs control measures include attenuation ponds, swales, and rainwater harvesting.

3) Submission of the original Defra metric calculator would also be useful along with clarification on grassland target condition of different areas.

The Biodiversity Net Gain has been updated and the updated Defra metric worksheet is also provided. The updated BNG assessment has split the habitats assessed into two sections (refer to mapping in the BNG report and shadow HRA) to demonstrate additionality. Good practice is that net gains in biodiversity are additional outcomes to those that would happen anyway. The habitat parcels assessed under the requirements of the HRA (refer to shadow HRA) have not been included in the net gain metric.

The BNG worksheet provided clarification on the grassland target condition for different areas.

- Existing grassland habitat – modified, is poor
- Proposed (created):
    - Vegetated garden, poor
    - Amenity grassland, poor
- Proposed (enhanced):
    - Other neutral, good (boundary buffer habitats, southern floodplain meadow area).

It is agreeable that comments relating to matter on the landscaping and lighting layout are addressed by condition, as also recommended in the shadow HRA.

Yours sincerely,

Sarah Forsyth,
Principal Ecologist, ACIEEM