

Ecology Team Consultation Response	
Date:	08.10.2025
Planning Ref:	4/25/2110/0F1
Description:	Erection of 95 dwellings with associated infrastructure.

The county ecologist accepts the Shadow Habitats Regulations Assessment produced by Envirotech July 2025. Email correspondence from the applicant to the council on 08.10.2025 confirms that no water abstraction from the River Ehen SAC will occur to support this development.

Suggested Planning Conditions

Construction Environmental Management Plan (CEMP)

A CEMP should be produced to detail the procedures for protecting the environment during construction to address the following points (but not limited to):

- Pollution prevention control
- Dust mitigation
- Impaction of habitats
- Species protection during construction (see below)
- A sensitive lighting scheme for bats and other wildlife

This CEMP must also follow mitigation methods set out in the Shadow HRA.

Ecological Supervision

In order avoid committing a wildlife offence under the Wildlife and Countryside Act 1981 (as amended), the applicant must employ an Ecological Clerk of Works (ECoW) for the initial clearance works. The ECoW will ensure the avoidance and protection of breeding birds, small mammals, herptiles (if any) and ensure all works adhere to the procedures set out in the CEMP.

Breeding Birds

To mitigate disturbance effects vegetation clearance should take place outside of the breeding bird season (which runs March to August, inclusive). Where this timing is not possible the area should be checked prior to removal by a suitably experienced ecologist and if active nests found, vegetation left untouched and buffered until all birds have fledged.

Provision of four artificial swallow cups beneath the eaves, four swift boxes at gable ends and erection of four sparrow terraces on external wall faces would improve the overall nesting potential of the site.

Small Mammals and Badgers

All development work should be carried out with care to avoid small mammals such as hedgehogs and brown hare, and badgers. Badger setts are known to occur within 2km of the site. These setts will be undisturbed by work but in order to minimise impacts on badgers passing over the site the following points should also be followed.

- All work must take place during daylight hours as badgers are more likely to be commuting over the site at night and this will ensure the risk to any badgers passing through the site will be minimised.
- Should any trenches and excavations be required, an escape route for animals that enter the trench must be provided, especially if left open overnight. Ramps should be no greater than of 45 degrees in angle. Ideally, any holes should be securely covered. This will ensure badgers are not trapped during work.
- All excavations left open overnight or longer should be checked for animals prior to the continuation of works or infilling. Back filling should be completed immediately after any excavations, ideally back filling as an on-going process to the work in hand.
- Boundary fences/walls should incorporate gaps at their base to facilitate the passage of badgers across the site.

Bats

Sensitive lighting scheme in line with the guidance note for Bats and Artificial Lighting (Bat Conservation Trust, 2023) should be adopted on site, as the long-term impact of unnecessarily bright or recurrent artificial lighting on both bats and their prey is rarely ever positive. The following points should be considered:

- All artificial light should be downward facing and of a low intensity.
- Passive infrared sensors could be used on security lighting, which can then be activated for safety purposes only.
- Consider the use of LED luminaires, which shine with a lower intensity and higher dimming capability.

- Utilise shades of warm white, which appear more yellow/orange in appearance, over cold white light. Cold white light contains a greater degree of blue light, which attracts insects that cannot be preyed upon by bats, which are hypersensitive to these wavelengths of light.

Four bat roosting features for crevice dwelling bats should be discretely incorporated onto the site. This could include the provision of integrated bat boxes, bat bricks, bat tubes and access tiles.

GCN

In order to further minimise impacts and to avoid committing an offence on amphibians, the points set out in Paragraph 7.2.5 of the Preliminary Ecological Appraisal by Envirotech (2023) must be followed.

To provide suitable refugia for both amphibians and reptiles, two hibernacula in the form of piles of stone or loggeries should be created along the site edges of the northern and eastern boundary.

Biodiversity Net Gain

No development hereby permitted shall commence until:

- a) a Biodiversity Gain Plan has been submitted to the planning authority demonstrating a 10% net gain,
- b) the planning authority has approved the plan in writing,
- c) the onsite habitat provision is accompanied by a Habitat Management and Monitoring Plan in place for 30 years as the gains here constitute 'Significant On-site Gains', this monitoring plan is to be accepted by the council and,
- d) Monitoring results are to be programmed to be submitted to the council. These should include evidence demonstrating how BNG is progressing towards achieving its objectives, evidence of arrangements and any rectifying measures needed. The development shall be carried out in accordance with the approved plans.