

RE: 25/0520



Harris, Matthew (Ecology Officer)

To  Ostler, Marnie (Planning Officer)

Retention Policy 7 Year Delete (7 years)

Expires 31/08/2032



Tue 15:25

Hello Marnie,

In general I agree with the methodology and conclusions of the preliminary ecological appraisal (PEA), and with the CEMP condition that is proposed. However, I am concerned that the PEA does not consider the impact of the loss of tree groups G21 and G22, as shown in the Arboricultural Impact Assessment. Furthermore, where loss of habitats has been assessed (0.02 Ha of ruderal habitats), compensation for this loss and enhancement is proposed in the form of managing 0.06 Ha of habitats to improve their condition. This is based upon the assumption that there are habitats which are currently in poor condition, and that this condition can be improved by habitat management.

In order to accept this compensation and enhancement, together with that for the loss of the tree groups which has yet to be assessed, I would need to be convinced that there is genuinely a capacity within the existing habitats for their condition to be improved to the extent that the loss of habitat extent is compensated for. Many of the habitats on and around this site consist of scrub, rough grassland, open mosaic habitat on previously developed land, and tall ruderal habitats. These habitats have value in their own right, and I am not satisfied that the presence of bramble or pernicious weeds such as curled dock or creeping thistle, which naturally occur in many of these habitats, are necessarily an indicator of poor habitat quality. In any event, scrubby habitats including bramble scrub are valuable for Dormice populations.

Therefore alongside the CEMP condition, we should also require the submission and implementation of a Landscaping and Ecological Management Plan (LEMP). This should assess the condition of the habitats on site, or nearby in the Applicant's ownership, and demonstrate that with appropriate management those habitats can be improved to the extent that loss of habitat due to construction is compensated for, and that a clear net benefit for biodiversity results.

The Applicant should also be satisfied that if tree groups G21 & G22 are to be removed as a result of the present scheme, then this would not have an adverse impact upon roosting bats.

Matt Harris
Ecology Officer