## **David Lowin**

From: Charlotte Watkins
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To: David Lowin Subject: 22/01144/F

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## David

With regard to the above application, the necessary surveys for ecology have been carried out and a full assessment of impacts. Updated surveys may be necessary if two years elaspses from the time of surveys until the start of construction or between phases.

The main ecological issue on site are the loss of habitats for the building footprint but an overall net gain for biodiversity in habitats is proposed of 7.3%. Whilst this falls short of the 10% minimum we seek, it is acceptable in policy terms. Additional net gain could have been/could still be achieved through the addition of green roofs on some parts or on suitable buildings or through enhanced management of the field to the centre of the ring of the application to the South West. I support the enhanced management of the ancient woodland (within the woodland management plan) and the additional woodland planting which will provide connectivity for this habitat in the area and ensure that this fragmant of ancient woodland does not deteriorate in condition. The woodland management and other areas of net gain off site will need to be secured in perpetuity and it should be made clear how this will be agreed particularly if this land is in separate ownership.

I have some concern about how the created and enhanced habitats on site, surrounding the buildings, will also double for amenity use by staff employed on site given the large numbers of employees that would be based here. Sufficient green space where the primary function is amenity needs to be provided in addition to habitats denoted for biodiversity to ensure the use of habitats by birds and reptiles in particular is not compromised. Some areas should remain as wildlife refuges with limited or no human trampling otherwise the 'good 'condition aimed for within the grassland is unlikely to be achieved. I concur with BBOWT'S assessment that the condition aimed for within created habitats is ambitious and at this stage is not yet justified as proposed management is not set out.

Ideally we would have the methodology for creation and management of habitats up front however it should be possible for these aspects to be dealt with by submission of a pre-commencement condition for a LEMP (or HMP). This does leave the possibility however that further land for net gain may need to be found if the level of gain aimed for and the management to achieve it cannot be clearly shown within the LEMP (if for example it is felt that the proposed conditions of created and enhanced habitats are unrealistic).

An LEMP should also include the locations and types of all species enhancements on site such as bat and bird bricks, (preferably with at least some integrated into the fabric of new buildings to ensure their retention for the lifetime of the development) but also hibernacula, insect hotels etc.. These additional provisions would go some way to making up the overall biodiversity enhancement levels.

There is no particular mitigation in place for farmland birds such as Skylark which were observed on site and the proposed habitats on site will not currently allow for this. A specific mitigation scheme for Priority bird species such as Skylark and Linnet could be conditioned but it is likely that this will involve additional off site measures.

A full lighting strategy to protect nocturnal wildlife will be required.

A pre-commencement Ecological Construction Method Statement will be required to ensure species and retained habitats are protected during construction. The scope outlined within the ES is satisfactory for this.

Protection of Bowlers Copse from hydrological impacts should be secured via a full drainage strategy which includes review periods to assess any impacts on the Copse and other habitats downstream and make adjustments where necessary.

Kind regards

Charlotte

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