

Part Land On The North Side Of Gavray Drive, Bicester, Oxfordshire

(Appeal by Gallagher Estates Ltd Under Section 78 of the Town & Country Planning Act 1990)

PROOF OF EVIDENCE by Haidrun Breith on behalf of The Berks Bucks & Oxon Wildlife Trust (BBOWT)

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PINS Appeal Reference: APP/C3105/W/17/3189611
Cherwell District Council Application reference (15/00837/OUT)

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1 Introduction

<u>Witness</u>

- 1.1 My name is Haidrun Breith and I am the Senior Biodiversity & Planning Officer for Oxfordshire at the Berkshire Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT). I have 14 years' experience of working in planning, most of which was as a Natural Environment Officer at the Spatial Planning division at Wycombe District Council, where I had an advisory role to planning on matters concerning ecology and landscape.
- 1.2 At BBOWT I comment on planning related issues concerning Oxfordshire with a view to minimising effects of development on nature conservation interests. I also work with local authorities, other nature conservation organisations and individuals to enhance Oxfordshire's biodiversity interest and wildlife.
- 1.3 I hold a Master in Science (with Distinction) degree in Countryside Management from the Manchester Metropolitan University and a First Class Honours Degree in Landscape Architecture & Planning from the Technische Universitat Berlin (Germany). I am a full member of the Chartered Institute for Ecology and Environmental Management (CIEEM) as well as a Chartered member of The Landscape Institute (CMLI).

BBOWT

- 1.4 The Berks, Bucks & Oxon Wildlife Trust (BBOWT) are one of 47 Wildlife Trusts that operate across the UK to safeguard and enhance our country's wildlife. BBOWT was established in 1959 by local naturalists and now manages 88 nature reserves in the three counties, many of which are in the proximity of existing and new settlements and urban conglomerations.
- 1.5 Our planning work seeks to ensure that provisions for wildlife and nature conservation are fully accounted for within the planning system at both the strategic and development control levels.
- 1.6 In respect of the application forming the basis of this appeal it is, therefore, our intention to focus on the issues relating to biodiversity and nature conservation.

2 Scope of Evidence

- 2.1 This appeal relates to the proposed development of 180 units onto the western part of the Bicester 13 allocation site. The application is outline with matters of design and layout reserved.
- 2.2 This Proof of Evidence deals with issues raised in reason 1 of the refusal. The scope of BBOWT's evidence will be confined to that which relates to the nature conservation interest of the site forming the subject of this planning appeal, and the planning policies and legislation that are pertinent to that interest.
- 2.3 We have outlined our main concerns in the Statement of Case, which remains part of our evidence and should be read in conjunction with this document. We would like to elaborate on both issues raised in the SOC but particularly wish to focus on providing more information on our concerns with regard to impacts on the adjacent Local Wildlife Site (LWS) in the absence of a management plan.
- 2.4 We do not intend to reiterate arguments made in relation to evidence we understand is being presented by other Rule 6 parties, however, on some points it may be unavoidable as some crossover on our evidence may be necessary in order to clarify certain points.
- 2.5 We intend to show that the proposed development forming the subject of this appeal would have unacceptable net detrimental effects on biodiversity across the Bicester 13 site, which is a material consideration in arriving at planning decisions.

3 The Appeal Site

- 3.1 The appeal site is part of a wider strategic allocation of land for residential development known as Bicester 13 in the Cherwell Local Plan 2011-2031 Part 1 (CLPP1). This site allocation Bicester 13 allocation is bounded by the railway on the west and north, the A4431 on the east and Gavray Drive on the south.
- 3.2 The appeal site forms the western part of the allocation site and predominantly comprises intensive farmland. Langford Brook which flows in north-southerly direction across the allocation site forms the eastern boundary of the appeal site, and is included as the western boundary of a Local Wildlife Site: Gavray Drive Meadows.
- 3.3 The land east of Langford Brook is characterised by a mosaic of lowland meadow habitat, scrub, hedgerows, mature trees and ponds. A large part of this area east of

- Langford Brook (within the remainder of the allocated Bicester 13 site) is covered by the Gavray Drive Meadows Local Wildlife Site (LWS).
- 3.4 The majority of the eastern part of the eastern part is not actively managed with the exception of three fields that are subject to a mowing regime. Parts of the site are overgrown with encroaching scrub. The site is crossed by a public right of way and a number of permissive paths.
- 3.5 In line with the appellant's reference the western part of the site, ie the appeal site is referred to as Gavray Drive West (GDW), whilst the land east of Langford Brook up to the ring road is referred to as Gavray Drive East (GDE).

4 BBOWT's case

Addendum to the Environmental Statement

- 4.1 The recently submitted Addendum to the Environmental Statement focusses on the appeal site but does not include survey updates for the remainder of the Bicester 13 site including the Local Wildlife Site (LWS). Much of the survey data for the Gavray Drive East (GDE) date back to 2013/14 and the lack of survey updates calls into question the reliance of some of the environmental impact assessments. Para. 99 of circular 06/2005 requires decisions to be made on up to date information. BS42020:2013 standard suggest a validity of survey data for approximately 2-3 years (para 6.2, appendix 5). Based on this some of the ecological survey information for GDE might no longer be up to date.
- 4.2 The Addendum does therefore not materially change the merits of the case and BBOWT retain their objection to the application.

Non-compliance with Local Plan policy

- 4.3 As already outlined in our Statement of Case (SoC) BBOWT is not in principle against an appropriate level of development on the western part of the Bicester 13 site but we are of the view that development of the allocated site has to be considered comprehensively as this is the only way to ensure that impacts are considered in their entirety and a judgement can be made on whether or not the requirements of policy Bicester 13 are met.
- 4.4 We note that the appellant argues in para 4.3 of his statement of Case that "Policy Bicester 13 does not require a single application approach." BBOWT is of the view whilst Bicester 13 policy might not specifically state a comprehensive approach it

does also not state that the site can be developed as separate applications. To our knowledge it has never been suggested in the long planning history of this site that it should not be considered in its entirety. It is also our experience from planning work in the three counties that in the absence of an SPD allocation sites are usually subject to an outline application for the whole site to ensure an appropriate assessment against policy before sites are sold and developed in phases as part of Reserved Matters applications.

- 4.5 It is BBOWT's view that whilst it is possible to build the site out in phases that the Bicester 13 site needs to be considered holistically at the outset to ensure that the requirement of the policy can be adequately met, and that appropriate legal agreements can be drawn up such as for the management of the LWS.
- 4.6 The management of the LWS and other habitats of nature conservation interest is a clear requirement of policy Bicester 13 and it is therefore our view that the production and implementation of a management plan needs to be addressed now when development on the site is being considered and cannot be postponed until a potential future application for the eastern part of the site (Gavray Drive East) comes forward as there is no certainty when, or even whether, this will ever happen.
- 4.7 This uncertainty is heightened by the applicant's interpretation that the policy requirement for an Ecological Management Plan applies to areas within the red line rather than to the Bicester 13 site. If the same interpretation was adopted for a potential future application on GDE it could again result in no management coming forward for the LWS as it will be outside the red line. The Addendum to the ES already indicates in para 9.8.3 that an application on GDE would aim to address any recreational needs and ecological impacts through the provision of a public right of way and an open space within the proposed development which would confirm this. With this approach the LWS would in effect never receive management as required by policy despite it forming a major part of policy Bicester 13. It is also worth noting that the Illustrative Masterplan Sketch for GDE does not show any open space and it difficult to see how sufficient attractive open space could be provided within the development.
- 4.8 We believe that this interpretation would be not in line with the intention of policy Bicester 13, which seeks to find a balance between conserving and enhancing the nature conservation interest of the Bicester 13 site and the need for housing.
- 4.9 Cherwell Local Plan 2011-2031 local plan policies Bicester 13, ESD10 and ESD11 require development to deliver ecological enhancements and a net gain in biodiversity. As outlined in our SoC we welcome the submission of a Biodiversity

Impact Calculator (BIC) as a means to measure net change in biodiversity, however, we would like to reiterate that such calculators are only a tool when considering ecological impacts and in this case cannot on its own do the rich species ensemble on the Bicester 13 site justice.

4.10 Mr Woodfield has outlined in his comments on the application and in his Statement of Case the complexity of this tool and the caution that needs to be applied in taking its outputs at face value and we understand that he will provide more detail with regard to this at the public inquiry.

Local Wildlife Site (LWS) - Ecology and Impact

Gavray Drive Local Wildlife Site (LWS)

- 4.11 Gavray Drive LWS encompasses a large part of the eastern part of the Bicester 13 allocation site (East of the Langford Brook). The LWS was designated in 2002 and comprises a mosaic of habitats that supports remnants of nationally rare lowland meadow priority habitat as well as grazing marsh, scrub, ancient hedgerows, trees and ponds. It is rich in wildlife including protected and notable habitats and species including butterflies (in recent years at least four of the five UK hairstreak species), scarce moths, great crested newts, bats, reptiles and birds. This richness is also evidenced in the application submissions of other Rule 6 parties in particular Dominic Woodfield, Butterfly Conservation and Save Gavray Meadows.
- 4.12 The ecological surveys undertaken to support the Environmental Statement in 2014 demonstrate the continued ecological importance of Gavray Drive Meadows LWS. The specialist botanical surveys undertaken by BEC, included as appendices to that ES, conclude that the site still qualifies botanically as LWS, albeit identifying the significant changes that have occurred on the site through natural succession since its designation in 2002.
- 4.13 This highlights the importance of management to conserve the botanical interest of the LWS, as it is recognised in Policy Bicester 13. The lack of management over the years has led to change and some deterioration in habitats, but it is encouraging that almost all of the meadow indicator species recorded in 2002 were still found to be present on the site in 2013.
- 4.14 Unfortunately since the production of the ES another four years have passed without any management of the LWS and some of the survey information might no longer be up to date. The recently submitted addendum to the ES does not include updated botanical survey information for GDE including the LWS. It is possible that the

- negative effects predicted to arise from recreational pressure on the LWS that are referred to in the ES and the ES Addendum (e.g. para 9.5.18 of the ES Addendum) will have been compounded by that ongoing neglect such that the impact assessment is out of date.
- 4.15 BBOWT is concerned about the indirect impacts the appeal proposals will have on the nature conservation interest of the LWS in the long term. The Ecology Chapter of the Environmental Statement (para 9.5.17) and the recent Addendum to the ES (para 9.5.18) state that the development will put the LWS at risk from adverse effects resulting from increased recreational pressure.
- 4.16 To comply with Policy ESD10, mitigation is required to reduce the impact on the LWS and to achieve a net gain in biodiversity. The applicant seeks to address this by providing an open space on the western side of Langford Brook. Whilst the open space is welcomed and will help to address some recreational needs it will in our view not be able to address all recreational pressures and new residents will also use the adjacent GDE area for recreation.

The importance of management for urban fringe sites

Current research

- 4.17 Although there is considerable research that relates to recreational impacts on birds, there is relatively limited current research available on recreational impacts on nature conservation sites near urban areas. However, there are two studies of particular relevance in providing an understanding of the need for management of such sites: Natural England's research on LWS in urban fringe situations (Routh, 2016) and a study by the Yorkshire Wildlife Trust (YWT) on Human Impacts on Nature reserves near settlements (Rylatt et al, 2017).
- 4.18 Natural England's research on LWS in urban fringe situations (appendix 1) shows that such sites tend to deteriorate more than their rural counterparts due to insufficient positive management. The report states in para 3.2: "... positive management for wildlife was notably less likely when the site was within 100m of an urban area". This was found to be particularly the case for grassland sites. Reasons for this include amongst other things indirect impacts of people (eg vandalism, stock worrying and dog fouling), smaller holding sizes which make grazing less attractive, and the lack of economic incentives which allow the biodiversity value of the site to decline (para 3.3).
- 4.19 The study by the YWT analysed effects on their reserve by looking at different types of damage and disturbance, namely 1) litter/ flytipping, 2) damage and disturbance

by dogs and other domestic animals, 3) anti–social behaviour, 4) theft and destruction of wildlife and property and 5) damage to vehicles. The study found that all types of damage occurred more frequently the closer the reserve to the settlement and states in its opening summary "recreational disturbance and damages can result in significant impacts on wildlife and habitats, and the addition of extra housing to an area can increase such measures considerably." (Rylatt et al, 2017; appendix 2)

- 4.20 An English Nature's research report on dogs, access and nature conservation (Taylor, K., 2005; appendix 3) highlights issues of dog walking and nature conservation. The study includes in its executive summary a number of points that help to understand impacts of dogs better and which are of interest for the appeal. These include amongst other things:
 - walkers with dogs have a larger 'sphere of influence' with regard to wildlife than walkers without a dog;
 - In lowland areas 25-50% of walkers were accompanied by dogs and that 50-90% of dogs were off lead, with 14% being out of control;
 - With regard to birds the presence of dogs provokes a disturbance response at greater distances and for longer periods during the breeding season for most of the species studied, especially ground nesting ones;
 - Research has shown that dog faeces and urination make a contribution to the nutrient enrichment of infertile habitats, and that a significant proportion of dog owners do not pick up the faeces;.
 - A significant proportion of owners are responsive to campaigns to clear up after their dog particularly when they are made aware of the effects and are provided with facilities for convenient disposal.
- 4.21 With regard to management the survey found that dog management policies vary in effectiveness but wardening, steering and regulations appear to work best, whilst leaflets and signage were less effective, except as part of a comprehensive strategy.
- 4.22 It concludes in the last couple of paragraphs of the chapter that available evidence shows that dogs disturb ground nesting birds in particular and that the greatest risk is from predation of eggs or young when parent birds are flushed from the nest. It states that "... Evidence suggests that integrated management strategies can be devised (base on control of dogs and influencing owners) that will reduce the impact of dogs on many nature conservation sites, and seek mutually beneficial solutions." (final paragraph, executive summary).
- 4.23 A literature review on the effect of pet cats on nearby protected wildlife sites was carried out by Footprint Ecology in 2013 (appendix 4). The study states in its

summary (page 3) that approximately a quarter of households in the UK own at least one cat and that it is one of the most abundant carnivores in the UK. It is primarily a predator of small mammals but will also kill large numbers of birds, herpetofauna and invertebrates. When considering the maximum linear distance travelled by cats from one point to another, distances of over 3km have been recorded. It states further that mitigating measures such as bells and collar-mounted devices, fencing or modification of the cat behavior by owners, have reduced cat predation rates but have not been found to entirely prevent it.

BBOWT's experience

- 4.24 As managers of over 88 nature reserves and designated sites within the three counties BBOWT has extensive experience in managing nature conservation sites, including those in close proximity to existing and new residential areas. These protected places are central to the Trust's work for a better future for wildlife. Every reserve is carefully managed and monitored for both its wildlife and the enjoyment of visitors. BBOWT has therefore a wealth of experience in managing sites for nature conservation in proximity of urban settings and reconciling recreational pressure with wildlife conservation. In addition to our own reserves we also help to manage urban nature reserves in partnership with Oxford City Council and local community groups as part of our Wild Oxford and our Wild Banbury projects.
- 4.25 BBOWT's experience of managing sites is consistent with the findings outlined above. Key problems we encounter include littering, fires and issues related to dog walking such as unofficial path creation, dog mess and dogs off-lead disturbing and injuring grazing animals and wildlife. In addition we experience anti-social behavior, vandalism (eg destruction of signage, board walks, fences, gates, trees), drug use and as a result of this littering with needles, fly-tipping, unofficial path creation sometimes into areas that are not safe and the creation of dens.
- 4.26 Out of these, dog walking in particular dogs off-leash present one of the key challenges in managing sites because of the resulting dog mess and related to that the nitrification of soils, dogs disturbing ponds and the worrying of livestock and wildlife.
- 4.27 For example at our Cholsey nature reserve in South Oxfordshire we have had two incidents with dogs off-leash attacking wildlife within two weeks. In one of the incidents a lady was walking eight dogs, all of leash, when one of the dogs flushed a muntjac deer and tried to kill it. Only the intervention by one of our staff avoided the animal being seriously injured or killed. Being located at the Thames Path this reserve

has always been popular with visitors, however, we have noticed a significant increase in dog walkers, littering, damaging of habitats (eg trampling and burning) since the former hospital site was developed with 350 homes despite the development being accompanied by a considerable amount of formal and informal open space.

- 4.28 Another example of impacts of human behaviour on nature conservation sites in an urban situation is our Wildmoor Heath reserve in Berkshire. The site is a SSSI and forms part of the Thames Basin Heath Special Protection Area (SPA). The reserve is surrounded by housing and as a result of this subject to a lot of recreational pressure. It has the same issues of dogs off-leash worrying livestock and wildlife, dog mess, fires and vandalism but it also had a tree structure built within the canopy of the trees, which was not safe and attracted anti-social behavior. The structure was removed but the dispute is ongoing and BBOWT staff are still subjected to abuse and threatening behavior in addition to vandalism of the site on a regular basis. This is not only bad for wildlife but also bad for the local communities who can no longer use their open space resource.
- 4.29 With regard to dogs it is BBOWT's experience that the percentage of dog walkers is often even higher than 50% as stated in the NE research report. We find that people tend to prefer to walk their dog in natural environments and therefore travel to our reserves to walk the dog rather than use the formal open spaces near their homes. It is also our experience that people copy other people's behavior and follow informal tracks even if these are not permitted. Dog walkers also seem to prefer longer circular routes as part of regular dog walking routines.

The benefits of management

- 4.30 Managing sites in urban contexts is challenging but many habitats require management to retain their species diversity and the lack of management will inevitably lead to the deterioration of the nature conservation value of habitats and sites.
- 4.31 Long-term management of nature conservation sites in urban fringe settings is therefore essential, not just to maintain habitat and species value, but to combat and address urban-fringe pressures. Such management can include measures such as access management and controls (directing foot traffic along defined and contained routes), interpretation and provision and servicing of dog-waste bins at access and egress points. Habitat management not only helps to conserve nature conservation

- interest but will also improve the site's resilience to recreational effect and to improve the population of species.
- 4.32 Management is not only important for wildlife but also to ensure that sites are retained for the wider benefit of the community. People place great value on open space and prefer housing areas near green spaces and the development values at Gavray Drive will doubtless receive some uplift from the presence of the LWS. However such sites require management. Neglected sites and sites that are already subject to littering and vandalism tend to attract more such behaviour.
- 4.33 It is also BBOWT's experience that working with the community is key to creating valuable open space for wildlife and people and it should be seen as an opportunity to create a sustainable community, which is attractive to live in. Getting the local community involved for example through volunteering and educational events, significantly increases the understanding of the nature conservation interest of the site and creates a sense of ownership, with the result that people look after it. The earlier this begins in the life of a development the better. It is much more difficult to retrofit a management plan to an established recreational area, or to encourage change in behaviours once they have become established by new residents.
- 4.34 It is also our experience that developments need to provide sufficient attractive alternative open space for informal recreation and play to attract people to use these areas rather than the nearby nature conservation sites. In addition to that access within nature conservation sites needs to be managed to protect more sensitive ecological areas from disturbance by making other parts available for informal recreation for people and dogs.
- 4.35 A combination of 'honeypot' areas that seek to draw some of the pressure away from nearby sites of wildlife value, <u>and</u> management of those sites of wildlife value to preserve their interest and improve their resilience, is necessary to avoid negative effects arising. If only one or other of those measures is in place, there is likely to be a net negative effect.

The importance of secured management at Gavray Drive LWS

4.36 Gavray Drive East although not a nature reserve is already subject to many of the issues outlined above. It is regularly used by dog walkers using an informal path network across the site, as well as suffering a degree of littering and fly tipping. The lack of management means that the site has become increasingly overgrown and unmanaged as there are no access restrictions on site and people and dogs can access all parts of the site, including those that contain habitats and species that are

most sensitive to disturbance such as grassland areas and ponds. The lack of management has resulted in meadow areas and other parts getting increasingly scrubbed over. Lowland habitat species are still clinging on in reduced numbers but will eventually disappear without long-term management. With 180 additional houses on adjoining land, these negative influences will undoubtedly get worse in the absence of management.

- 4.37 The proposed open space within the appeal site on the western side Langford Brook is partly located within the floodzone and its usability might therefore be compromised during wetter times of the year. It is proposed that this area of open space will include tussocky grassland, hedgerows and ponds but these will take some time to establish. BBOWT have concerns about the compatibility of tussocky grassland and meadow creation (and management) with the pressures that will fall on this area, including for more formal types of recreation such as kickabout areas. BBOWT is not convinced that the space can deliver all the enhancements of habitats and species whilst at the same time offering recreational open space to 440 residents. The most obvious way to achieving a net gain is by providing management to the adjacent LWS for the benefit of wildlife and people.
- 4.38 As the open space will offer a more formal open space resource it is to be expected that a proportion of those seeking recreation will use the LWS for example for walking the dog and for children and teenagers to meet and play there.
- 4.39 Using the figures in the study mentioned above one might also expect an increase in cat populations by approximately 45 cats, some of which would be expected to include GDE in their home range.
- 4.40 Long-term nature conservation management of the Local Wildlife Site would help to mitigate the impact of such recreational pressure on the LWS, improving the condition of the habitats and making them more resilient. The need for such conservation management of the LWS is also supported by Natural England's recent advice to this appeal (NE letter to PINS, dated 2nd February 2018).
- 4.41 The most appropriate management approach for GDE would need to be defined in a management plan but should include management for habitats and species of conservation interest. It would be expected to include scrub control, pond management, hedgerow management and restoration and management of the rare lowland meadow habitats which would need a mixture of grazing and cutting. In addition GDE would benefit from access management, i.e. restricting access to the more sensitive areas, preventing trampling of lowland grassland areas when shut-up

- for hay, restricting access to ponds and encouraging access to other less sensitive areas. Appropriate habitat management will benefit the species that depend on it and will make their populations more resilient.
- 4.42 In case of no management the site will in our view come under increased pressure exacerbating current decline and the impacts outlined above. This will lead to a further deterioration of habitats as a direct consequence of the appeal proposals leading to a net loss in biodiversity across the whole Bicester 13 allocation site.

5 Conclusion

- 5.1 Policy Bicester 13 sets out a clear framework for achieving a balance between development and protecting and enhancing the considerable nature conservation interest within the Bicester 13 allocation site. We are not satisfied that the proposed development, which has come forward for parts of the allocation site meets the policy requirements of policy Bicester 13 as it does not allow for a comprehensive assessment of impacts nor does it fulfil the requirement for an ecological management plan.
- 5.2 We consider that the impacts of the development on the nature conservation interest of the Local Wildlife Site have been insufficiently recognised and believe that in the absence of an ecological management plan the development will result in an unacceptable adverse impact on habitat and species within the LWS. Policy ESD 10 of the New Local Plan seeks the protection and enhancement of locally designated sites. It is clear from this that the LWS should be protected from impacts and subject to an ecological management plan. Management of the LWS is necessary to ensure its biodiversity interest is conserved, and by improving habitat condition could also help towards mitigating impacts from recreational pressure. Without this the application does in our view not comply with Local Plan policy (ESD 10 and ESD 11).
- 5.3 As such we consider the development to be in conflict with Cherwell Local Plan policies Bicester 13, ESD 10 and ESD11 as well as the NPPF. We request for the appeal to be dismissed.

6 References

British Standard (2013): *BS 42020:2013: Biodiversity – Code of practice for planning and development.* British Standards Limited 2013.

Floyd, L., Underhill-Day, J. C. (2013): Literature review on the effects of pet cats on nearby protected wildlife sites. Unpublished report by Footprint Ecology for Breckland Council.

Available online: http://www.footprint-

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Routh, C. (2016). *Is the management of Local Wildlife Sites affected by the urban fringe?*Natural England Research Reports, Number NERR063. Available online: http://publications.naturalengland.org.uk/publication/6134796821463040.

F Rylatt, F., Garside, L. & Robin, S. (2017) *Human Impacts on Nature Reserves – The Influence of Nearby Settlements*. In: InPractice – Bulletin for the Chartered Institute of Ecology and Environmental Management, Issue 97, September 2017.

Taylor, K., Taylor, R, Anderson, P., Longden, K. & Fisher, P. (2005): *Dogs, access and nature conservation*. English Nature Research Reports, Number ENRR649. English Nature, Northminster House, Peterborough PE1 1UA. Available online: http://publications.naturalengland.org.uk/publication/65013. Accessed 15th May 2018.

7 Appendices

Appendix 1:

Is the management of Local Wildlife Sites affected by the urban fringe? (Routh, C., 2016). Natural England Research Reports, Number NERR063.

Also available online:

http://publications.naturalengland.org.uk/publication/6134796821463040

Appendix 2:

Human Impacts on Nature Reserves – The Influence of Nearby Settlements. (Rylatt, F. et al, 2017) In: InPractice – Bulletin for the Chartered Institute of Ecology and Environmental Management, Issue 97, September 2017.

Appendix 3:

Excerpts from: Dogs, access and nature conservation (Taylor, K. et al, 2005)

English Nature Research Reports, Number ENRR649.

Also available online: http://publications.naturalengland.org.uk/publication/65013.

Appendix 4:

Excerpts from: *Literature review on the effects of pet cats on nearby protected wildlife sites.* (Floyd, L. & Underhill-Day, J. C., 2013):

Unpublished report by Footprint Ecology for Breckland Council.

Also available online: http://www.footprint-

ecology.co.uk/reports/Floyd,%20L%20and%20Underhill-Day,%20J%20C%20-202013%20-%20A%20literature%20review%20on%20the%20effects%20of%20pet%20cats%20on%20.pdf.

Appendix 5:

Excerpt from: British Standard (2013): *BS 42020:2013: Biodiversity – Code of practice for planning and development.* British Standards Limited 2013.