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Biodiversity Deadline 6 AW April 2024

Biodiversity comments copied from the report for this planning application which is a small part of the proposed AW site. This is the same piece of grrenbelt as the proposed development. Highlights in red apply to AW site too.

[redacted]

Planning application for change of use to a barn on location to side of track [redacted] **to** [redacted]

This application is for a house on the land to the [redacted] In comparison to the site proposed for sewage works this patch is tiny but the below comments apply to all this land.

The Biodiversity report submitted by the applicant refers to the following:

- 8.2.2 Recommendations Species-specific recommendations have been detailed below under the appropriate heading for brown hare below.
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- **8.3 Nesting Birds**

- 8.3.1 Conclusions The hedgerows and trees within the site could provide suitable habitat for general nesting birds. The building itself also offers some opportunities for nesting birds, although not many due to the materials and design of the building.

- If birds' nests are disturbed during the process of incubation and rearing then mortality of chicks could occur. (SEE notes re REDLISTED SKYLARKS)

- Long term, there will be a loss of suitable nesting habitat, although this is considered minor when taking cognisance of the wider landscape. (This wider landscape is the proposed sewage works area.)
- 8.3.2 Recommendations Any works involving vegetation clearance or demolition/renovation works to the building will avoid the bird breeding season (late February to August inclusive) to avoid damage to nesting species. If this is not practicable, then a survey to identify active nest sites. Results of nesting bird surveys are only valid for 48hrs and, therefore, multiple surveys may be required for phased works or if works are delayed. (applies to AW site)
- Where possible, hedgerows and/or trees will be retained. Where this is not possible the site plans should include woody vegetation that may be used by nesting birds in the future.

- It is recommended that the new site plans include a provision of nesting habitats in the form of nest boxes. At least two integrated nest boxes should be included in the design of the renovated barn to compensate for the loss of suitable nesting habitat. An additional box may be provided as site enhancement, which may be an integrated or free-standing option, which should be installed on a tree or fence line within the site boundaries. See Appendix Five for more details.

8.4 Bats

8.4.1 Conclusions The trees and building within the site were assessed as offering negligible roosting potential for bats, due to the lack of suitable features present and open and exposed state of the building.

The site is considered to be suitable to support foraging/commuting bats particularly along the northern and eastern boundaries that have suitable habitat present and are also connected to other suitable foraging/commuting habitats offsite. AW site

- Removal of the hedgerow and trees may reduce the suitability of the site for foraging/commuting bats by removing linear features (AW site too).

- The site is currently unlit, any increase in lighting will reduce the suitability of the site for foraging/commuting bats through displacement of such behaviours. (AW site too)

8.4.2 Recommendations

- It is recommended that guidelines from the Bat Conservation Trust and ILP (Institute of Lighting Professionals) on bats and artificial lighting are followed. Lighting levels will be kept to a minimum on the boundary hedgerows/trees to retain dark commuting corridors. Generally, it is recommended to retain as much of the hedgerow borders as possible to maintain a linear commuting route for bats and any potential new lighting impacts associated with the proposed development (both during and post-construction phase) should be minimised by the use of warm white light sources and directional downlights - illuminating below the horizontal plane which avoids light trespass into the environment. The use of light directional accessories such as baffles, hoods and louvres can assist with this. Particular attention should be made to avoid lighting of the trees and boundary hedgerow and neighbouring habitats. Lighting types to be avoided include any blue-white light sources, metal halide and mercury lamps, and any form of up-lighting, which lights above the horizontal plane, illuminating trees and foraging habitat. (applies to AW too)
- It is recommended that the roofing felt used should be bitumen 1F felt. Non bitumen coated roofing membranes (NBCRMs) should not be used due to the risks posed to bats (Essah *et al.*, 2020, Waring *et al.,* 2013). This includes the use of NBCRMs to line any cavity walls, where bats may be able to enter the cavity for roosting purposes.

The soft-landscaping plans should include bat-friendly planting to retain suitable foraging habitat within the site (see Appendix Four).

- At least one integrated bat box should be included within the design of the renovated barn (see Appendix Four).

- Following the above measures, the impact is assessed as negligible – _minor beneficial.

8.5 Badger

- 8.5.1 Conclusions A badger sett was noted to be present within the site, with three burrows recorded (TN1), all with tunnels heading underneath the building. Two of these are considered to be more well used than the third one, although all three had worn paths to them.

- If badgers are using the site at the time of the works, then there is a risk of them becoming trapped in any open trenches/pits created during works.

- If the sett is active at the time of the works, then the works will damage/destroy and disturb an active badger sett and pose a risk of injuring/killing individuals presents.
- 8.5.2 Recommendations Construction works should be undertaken under the authority of a Natural England badger licence permitting the burrows to be closed. In support of that licence sett entrances should be monitored for a minimum of 21 days by means of remote cameras to assess the current status of the burrows (i.e. is the sett still active?) prior to the submission of the licence application. It should be noted that badger setts may only be closed between July- November under licence, once the planning application is approved and if closure is necessary a replacement sett would need to be created prior to closure of the active sett taking place, as part of the licence requirements.

- In addition, it is recommended to cover any trenches/pits created during the works each night to prevent badgers from becoming trapped. Alternatively, a ramp will be installed in these features to allow badgers to escape. (AW site)

8.6 Great Crested Newts

- 8.6.1 Conclusions There are no waterbodies within the site and none were noted during the desktop survey within the potential zone of influence. There is some suitable terrestrial habitat within the site, however taking cognisance of the lack of waterbodies, it is assessed as unlikely that great crested newts will be present within the site.

- It is not anticipated that the proposed works will impact on this species
- 8.7.1 Conclusions The site presents some potential sheltering and foraging reptile habitat, particularly the rough vegetation and brash pile [redacted] and the site is considered well linked to other areas of suitable habitat particularly to the east of the site. (AW site)The rough vegetation and brash piles are not considered dense enough to support hibernating individuals.

- Clearance of the vegetation and the brash pile may result in injuring/killing individuals.

- The proposed development will permanently remove suitable habitat that could support reptiles. However, taking cognisance of the size of suitable habitat within the site, the suitability and size of habitat offsite (AW site) and scope of works, the loss is considered to be negligible. Furthermore, reptiles will still be able to forage/commute through the site and may still utilise any of the greenspaces that will be provided within the site.
- 8.6.2 Recommendations No further recommendations for mitigation are made for this species. However, in the unlikely event that great crested newts are discovered during any stage of the works, then works should cease and a licensed ecologist be consulted for further advice.

- **8.7 Reptiles**

- 8.7.1 Conclusions The site presents some potential sheltering and foraging reptile habitat, particularly the rough vegetation and brash pile [redacted] and the site is considered well linked to other areas of suitable habitat particularly to the east of the site. (AW site) The rough vegetation and brash piles are not considered dense enough to support hibernating individuals.

- Clearance of the vegetation and the brash pile may result in injuring/killing individuals.

- The proposed development will permanently remove suitable habitat that could support reptiles. However, taking cognisance of the size of suitable habitat within the site, the suitability and size of habitat offsite (AW site) and scope of works, the loss is considered to be negligible. Furthermore, reptiles will still be able to forage/commute through the site and may still utilise any of the greenspaces that will be provided within the site.
- 8.7.2 Recommendations As a precautionary measure, it is recommended that the vegetation and brash pile (TN2) are removed by hand. The vegetation should be strimmed from the western end of the site towards the east to encourage any individuals to disperse into the neighbouring suitable habitat. Vegetation should be cut to approximately 10cm and either finger-tip searched by an experienced ecologist or left overnight before being strimmed lower the following day to ensure that individuals are unlikely to be present. Mechanical ground clearance can then proceed immediately after. Should the works be delayed, the same process should be followed to reduce the sward and encourage dispersal. In the unlikely event that any individuals are found during the clearance or any subsequent works, then they should be collected in a clean bucket and transported to the neighbouring areas away from the working site. Although hibernating individuals are not considered likely to be present within the site, as a precautionary measure, the clearance works should avoid the hibernation season (Nov-March) (AW site)
- The soft landscaping plans could include areas of longer grass/ tall herbaceous vegetation to provide suitable habitat for reptiles within the site.
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With proposed mitigation it is assessed there will be no significant effect on reptiles.

8.8 Barn Owl

- 8.8.1 Conclusions The barn is not considered suitable to support nesting barn owls as no suitable features to support this were present at the time of surveying. Furthermore, the barn roof is in a serious state of disrepair, this combined with the open/wind damaged doors on the western face of the building, makes the barn exposed to the exterior weather conditions.

The trees on site are also not considered suitable.

No evidence of presence was noted at the time of surveying.

The site may support foraging barn owls but taking cognisance of the surrounding habitat that is more suitable, (Refers to AW site) loss of suitable habitat from the development is considered negligible.

8.9 Brown Hare

8.9.1 Conclusions The arable fields surrounding the site are suitable and are known to support brown hares. The tall ruderal vegetation around the site may also support individuals. (AW site)

Any ground clearance works may result in injuring/killing individuals, particularly if undertaken during the breeding season (late Feb-Sept, inclusive) when leverets are likely to be present in hare forms. Hares may become trapped in open trenches/pits if left open. (AW site)

- The proposed works will result in a permanent loss of suitable habitat. However, taking cognisance of the size of the suitable habitat within the site, and the suitability and size of the offsite habitats, (refers to AW site) the impact is assessed as negligible.

8.9.2 Recommendations Any ground clearance should be conducted outside of hare breeding season (May-September). If this is not practicable, then a check for leverets within hare forms will be undertaken prior to works commencing by an experienced ecologist. If any forms are found, they should be clearly marked and avoided until the leverets are independent of their mothers. As with nesting birds, the results from these checks are only valid for 48hrs, so multiple checks may be required. (This all applies to AW site)

- Any pits/trenches left open will be covered or fenced off night to prevent any wildlife from becoming trapped. Alternatively, ramps will be installed to allow individuals to escape. (AW site)

- With proposed mitigation it is assessed there will be no significant effect on this species. (This only applies to this small site not to loss on whole site which will happen)

8.10 Hedgehog

8.10.1 Conclusions There is potential for hedgehogs to utilise the site for foraging/commuting purposes. The rough vegetation and brash pile (TN2) may be used by resting/sheltering individuals.

- Hedgehogs may become trapped in any pits/trenches created by the works if left uncovered at night and the clearance of vegetation poses some risk of injuring/killing individuals. Installation of new fencing could restrict foraging and commuting routes of hedgehogs. (Applies to AW site)

8.10.2 Recommendations It is recommended that hedgerows are retained wherever possible. (AW site) The hedgerow could be improved by adding more plants to it to thicken the hedge and fill in the multiple gaps. Native species should be used.

- Pits/trenches created during the works will be covered up or fenced off each night. If this is not practicable then ramps will be placed in each pit, nightly to allow individuals to escape. (AW site)

- Clearance of vegetation and the brash pile will be undertaken by hand, avoiding frosty days when hedgehogs may be hibernating.

- Provisions should be made to allow free movement of individuals in/out of the site (see Appendix Five).

With proposed mitigation/ compensation it is assessed there will be no significant effect on this species.

My points

All above is taken from the Biodiversity report for a very small site planning application on the edge of [redacted] The steps identified often refer to the AW site and I have marked significant actions and species identified.

AW say the land is not biodiverse this is incorrect on all counts for mammals, birds and insects. Their efforts to determine what animals are around on site is woeful probably deliberately so. A short walk will show deer, hares, foxes, stoats, weasels, birds of prey and song birds particularly red listed skylarks, garden birds, blackbirds, tits, woodpeckers thrushes, finches and many birds of prey including Sparrowhawks, Kestrels, Buzzards and Red Kites. As stated above there are badger sets on site and probable hedgehogs roaming and hibernating. Most of this report must apply to the wider site for the AW oproposed development. Some of this report is specific to the dilapidated barn and paved courtyard of this small site.

The Red listed nesting Skylarks were disturbed when exploratory work was carried out by Anglian Water. They nest at the sides of the access road and were actually nesting when the applicant had massive lorries using the track. I wrote and explained these are red listed birds and have used this site for many years. They are ground nesting. The vibration from the heavy vehicles passing the nests several times a day was disturbing. AW stated that their wildlife officer said they were far enough away from the nests not to disturb the birds. The eventual work site was further in to the site but passing by so close to the nests was of course disturbing. Some of the nests are less than 1m from the track. The birds bathe in any puddles along the track. Disturbing nesting birds is an offence in the UK.

As already stated by the professor who looked at the bat survey, the way the bats have been screened is not complete. Horningsea has many bats and light pollution will affect these and all night time animals and birds. They roost in large trees in and around the village, pipistrels can be found in vegetation in gardens and fields particularly in Ivy. Daubenton's bats access the river.

AW have said the land is damaged by intensive farming this is untrue as farmers have to farm ecologically due to the presence of the aquifer which is another reason why this site should not have been chosen. Especially with the pollution caused by water companies every year and currently affecting rivers and seas. This is Greenbelt land and has been supporting wildlife for hundreds of years. The hedgerows are old, and established pathways for the animals exist. Building work will disrupt these pathways. It is sheer arrogance to say that hundreds of years of greenbelt can be improved by the building of a sewage works.

Access to the land has already been made difficult due to damage done to the track by heavy vehicles. No attempt has been made to restore access. AW should be required to correct the damage they caused while surveying this land.

I apologise that this is late I was unable to find my unique ref number which is not on any emails. I managed to find one letter I had kept which had it on.

Please can you accept this information for the Biodiversity deadline of April 2nd.

Kind regards

Helen Santilly