

Ecology response for RM/23/94858 CHALCROFT BUSINESS PARK, BURNETTS LANE, WEST END

Approval of Reserved Matters pursuant to hybrid planning permission F/18/83945 giving details of the:

a) layout; b) scale; c) appearance; d) landscaping. For a scheme of 6,419 sqm of commercial floor space formed in 3no. buildings. (DUPLICATE APPLICATION 1)

Rachael Morris

17/4/23

Documents reviewed:

DAS by Boyle & Summers (February 2023)

Landscape Plan by Deacon Design (February 2023)

Landscape Management Plan by Deacon Design (February 2023)

Soft Landscape Specification by Deacon Design (February 2023)

Planting Schedule and Planting Matrices by Deacon Design (February 2023)

Constraints Plan by Boyle & Summers (January 2023)

Lighting Scheme by Holophane Europe Ltd (February 2023)

Response

As noted in the LLFA consultation response (13 April 23) surface water drainage information has not been provided for this application. The Landscape Plan does not show any permeable paving or drainage features. This information must be provided and must include simple index calculations for pollution and mitigation as shown in the CIRIA SuDS manual.

In Section 3.17 in the Soft Landscape Management Plan the weed control section states *Treat all planting beds with a winter herbicide to control weed growth*. This will also kill desirable perennial and plants such as bugle *Ajuga reptans* and meadow cranesbill *Geranium pratense* (listed in the planting schedule), which would be established, flower early and provide sources of nectar and pollen for insects before the annual flowering plants. Herbicides should not be used in planting beds, nor where they can run off into the wildflower meadow or into the SINC. Perennial weeds can be removed by hand digging if needed. Landscape operatives must be taught which plants are desirable and which are to be removed.

Section 4.3 mentions residential areas, which do not exist on this site. Information about ferns such as *Blechnum spicant* and *Dryopteris felix-mas* should also be included in the Native Grasses and Ferns section 4.17 or added as 4.18. Maintenance of climbing plants should also be included.

The Management of Hedging section of the Landscape Management Plan includes the direction to *Maintain weed free area 500mm width to each side of hedge centreline using suitable translocated*

herbicide. It is not clear to which planting areas this would apply. The habitat area planting and woodland or native scrub planting also includes maintaining a weed free 1 m diameter around the bases of trees using herbicides which I question.

Ecologically the understorey plants at the base of hedgerows and trees provide shelter for small animals and good habitat for invertebrates (which provide food for small animals). This important layer of vegetation would be killed off by herbicide treatment, which is not acceptable. Potentially invasive weeds such as thistle, nettle and dock can be hand pulled or spot treated but maintaining a non-vegetated layer under and beside the hedgerow plants is not acceptable. Each of the planting areas in the detailed planting plan have a list of low, medium and high plants.

In order for hedgerows to provide a continuous supply of flowers, fruit and seeds for wildlife they must be trimmed on a 3-year rotation, with top and alternate sides trimmed in successive years or 1/3 of the hedgerow trimmed each year rather than trimming the entire hedgerow every year in June and September as currently specified.

Pendulous sedge, *Carex pendula*, is quite invasive, will out-compete the other plants in these areas. is difficult to remove, and should not be included in landscape plans.

The inclusion of additional scented night flowering plants (in addition to honeysuckle) such as night flowering stock, tobacco and evening primrose would attract moths as food for bats.

The Management of Paved Surfaces section must include specific information on management and maintenance of permeable paving however I don't see any permeable paving shown on the landscape plan for this application. Is that an oversight?

The lighting diagram must also show the positions of the bird and bat boxes to be able to demonstrate that these areas will be kept dark. The current plan appears to illuminate the areas designated for the four bird boxes, which is not acceptable. The lighting columns labelled F1 to illuminate the parking areas to the north of building 10 and the lighting at the northern ends of buildings 11 and 12 would increase lighting levels in the wildlife habitat areas and SINC buffer above 1 lumen as shown on the lighting diagram. These areas will not function as ecological enhancements if they are illuminated at night.

The lighting information should include the details specified in the latest guidance on Bats and Artificial Lighting available at <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>. In particular, the guidance specifies *A warm white spectrum (ideally < 2700 Kelvin) should be adopted to reduce blue light component. Luminaires should feature peak wavelengths higher than 550 nm to avoid the component of light most disturbing to bats.* The information provided should confirm whether or not the proposed lighting complies with this guidance and if not, why.

Lisa Malter

Ecologist