

F/25/99361 Vehicular access off Satchell Lane to ESSO fuel compound

Ecology Response 1.7.25

DAS (Fisher German, May 2025)

PEA (Lineside Conservation Unit, April 2024)

AIA (Sapling Arboriculture Ltd, June 2024)

We object to the proposals for the following reasons:

1. The extent of habitat loss to facilitate the proposals (access and visibility splays) is unclear.
2. There is likely to be an unacceptable loss of habitat and modification of the scheme is required to reduce the loss.
3. The proposals are currently not exempt from BNG and therefore further information regarding this is required.
4. Further measures for protected species are required.

Habitat loss

There would be significant habitat loss to facilitate the scheme. The full extent of habitat loss has not yet been fully quantified, therefore further ecological assessment is required to fully determine the impacts.

A section of species-rich hedgerow situated on a medieval wood bank with a ground flora displaying ancient woodland indicators is to be removed. The total length of hedgerow to be removed for the visibility splays in addition to the vehicular access, is not clear (a 4m width is required for the vehicular access alone).

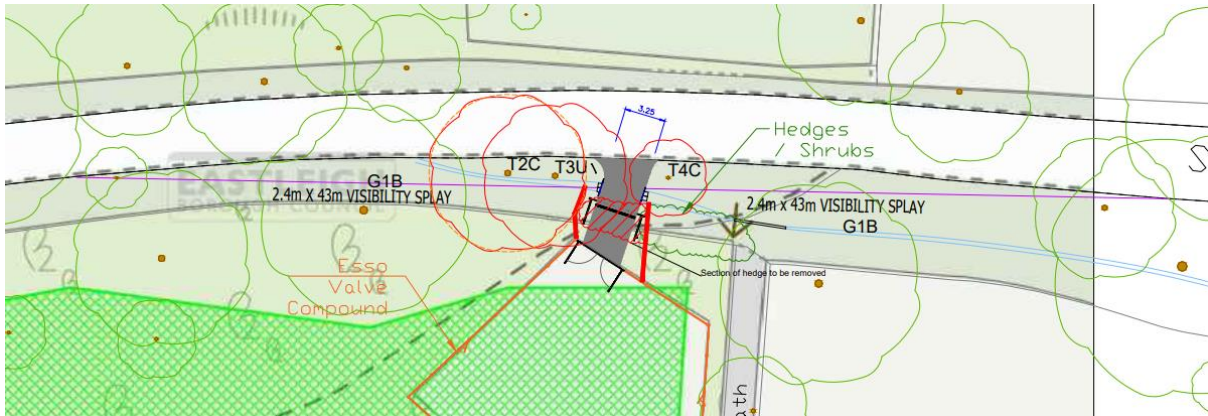
The arboricultural report states that three trees are to be removed for the visibility splays (hazel stool T4, ash T3 and oak T2).

The access crosses a watercourse and therefore a section of this habitat will be lost.

All the habitat to be lost under the footprint of the development and within the visibility splays still needs to be identified and quantified.

The historic bank on which oak T2 sits, is particularly high at this location. As T2 is within a visibility splay and therefore would need to be removed, the bank also may need to be lowered significantly within the splay(s) therefore also removing its associated flora.

From the AIA:



Please note however, even without full details submitted, as the scheme stands it appears the extent of habitat loss is too great and disproportionate to justify the new access point. Modification of the proposals is required to reduce the habitat loss to an acceptable level.

Biodiversity Net Gain

As the scheme stands, the area of habitat lost under the footprint of the development plus the loss of three trees and other vegetation for the visibility splays exceed the de-minimis threshold for statutory BNG. Therefore, a minimum 10% BNG is required for the scheme and for a modified scheme which exceeds the de-minimis threshold.

A fully completed BNG metric, with no errors, must be submitted for the site's habitat areas and linear features e.g. the hedgerow and watercourse and a 10% BNG delivered for all these elements. Pre-development and post-development plans and condition assessments must also be submitted along with details on how the proposed and retained habitats will be implemented, managed, maintained, monitored and funded for a minimum of 30-years. It must be demonstrated that proposals have followed the 'mitigation hierarchy' (avoid impacts, minimise impacts, restore, compensate).

Species

Dormice: It must be assumed that dormice are present. Therefore, suitable mitigation for the construction stage (e.g. methodology of vegetation clearance such as two stage clearance dependent on the timing of the clearance works) and operational stage must be provided. The latter could be achieved by planting a species rich native hedgerow around the field boundaries of the compound to maintain connectivity of the retained hedgerows. Details to show maintained connectivity must be submitted prior to determination.

Breeding birds: The breeding bird season is March to August inclusive, therefore vegetation clearance works must be carried out outside of this period. If clearance within the breeding bird season is unavoidable, then a thorough check of the vegetation for nesting birds must be carried out immediately prior to clearance. If an

active nest is found, it and a suitably sized buffer around it must remain undisturbed until the young have fledged.

Reptiles: The habitat that will be affected by the proposals provides suitable habitat for reptiles. It should be assumed they are present and therefore a methodology for appropriate vegetation clearance to temporarily displace reptiles during construction must be provided.

Bats: Any tree proposed to be removed must be checked for bat roosting features by a suitably qualified person prior to determination.

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