



Technical Note

Project: Land at Ebdon Road Weston-Super-Mare
Title: Response to ecological comments made by North Somerset Council
Date: 29 November 2021
Client: Mead Realisations Ltd
Reference: 211126_P886_Ebdon Road_Ecology Response: November 2021
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1 Introduction

- 1.1 This Technical Note has been prepared by EAD Ecology on behalf of Mead Realisations Ltd in relation to the proposed development at Ebdon Road Weston-super-Mare (North Somerset Council (NSC) planning reference 20/P/1580/OUT).
- 1.2 A previous Technical Note was issued on 31 March 2021 to address the formal consultation response from Lindi Rich of North Somerset Council.
- 1.3 Kate Jeffreys of North Somerset Council provided a second formal consultation response to the application in relation to ecological matters on 01/09/2021. A meeting was also held on 16 September 2021 to discuss this response. This Technical Note addresses matters raised in the additional consultation response and meeting.
- 1.4 An updated consultation response was also provided by Natural England on 12.11.2021 regarding the nearby proposed development at Lynchmead Farm (20/P/1579/OUT). As this consultation response addresses the same issues regarding designated sites and relates to the same developer, NE's comments have been taken into account below in relation to the Ebdon Road application.

NSC comment	Response
Habitats Regulations Assessment	
<p>There remains a lack of sufficient information to enable NSC to determine the ecological effects and to complete the necessary Habitat Regulation Assessment.</p>	<p>The information in the following sections, together with the previously submitted EclA report (April 2020), the March 2021 consultation response, and the November 2021 consultation response from Natural England regarding the proposed development at Lynchmead Farm provide sufficient information to enable NSC to undertake the Habitats Regulations Assessment, in accordance with its role as the competent authority. In summary:</p> <p>Severn Estuary SAC/SPA</p> <p>The site assessment and surveys set out in the EclA confirm that the site is very unlikely to be used by significant populations of waterfowl associated with the Severn Estuary assemblage. The development would not, therefore, impact ‘functionally linked land’ associated with the estuary. NSC can therefore conclude no likely significant effect in respect of this impact pathway.</p> <p>In accordance with the conclusions of the EclA, no water quality impacts on the estuary are predicted, through implementation of standard pollution control measures, during and post-construction. NSC can therefore conclude no likely significant effect in respect of this impact pathway.</p> <p>It was agreed at the meeting of 16 September that NSC will identify and cost suitable mitigation in relation to the potential in-combination impacts of increased recreational pressure on the Severn Estuary SAC/SPA. However, the consultation response from Natural England regarding Lynchmead Farm states that <i>“We do not object to this application in regard of impacts to the Severn Estuary and confirm that it is not a requirement for housing development near to the Severn Estuary to provide a contribution to alternative green space.”</i> The response also confirms that due to the distance of the application site from sensitive locations such as high tide roosts, it is not expected that the recreational impacts from the proposed development at Lynchmead Farm would result in a significant impact to the Severn Estuary. As the site at Ebdon Road is considerably smaller in size and lies at a similar, if slightly further, distance from the Severn Estuary sites, it is reasonable to assume that this response would also apply.</p> <p>NSC can therefore conclude that there would be no likely significant effect on the Severn Estuary European Sites as a result of this impact pathway.</p>

NSC comment	Response
	<p>North Somerset and Mendip Bats SAC</p> <p>As set out in the EclA, the site lies outside of the area identified as a ‘Bat Consultation Zone’ (BCZ) in respect of North Somerset and Mendip Bats SAC. The distance from the closest component of the SAC (6.1km) indicates that it is unlikely that horseshoe bat species recorded using the site would be associated with the core designated population. Nonetheless, the development incorporates measures to ensure continued permeability of the site to light-sensitive species, including greater horseshoe bats; further information is provided in the following sections. While these measures are not proposed as mitigation in relation to the SAC, they would also ensure that if bats associated with the SAC use the site, there would be no significant effect on their ability to pass through the site, and no effect on the conservation objectives for the qualifying bats would be likely. Accordingly, NSC can conclude that there would be no likely significant effect on the SAC as a result of the proposed development.</p>
<p>Updated Parameters Plan to identify the 0.5 lux zones within the development.</p>	
<p>It was agreed at the meeting that full lighting details are not required at this stage. However, NSC requested additional lighting details via a parameters plan, including details of how areas of 0.5 lux lighting levels can be realistically retained.</p>	<p>An updated Parameters Plan for the development has been prepared (refer to Appendix 1), to show the areas of the site identified as ‘dark corridors’, within which lighting levels would be maintained at under 0.5 lux at ground level and at 2m above the ground. These dark corridors would comprise a minimum 12m buffer along the River Banwell and a 5m buffer along the southern boundary hedgerow which would allow permeability of the site for bats and other nocturnal wildlife, providing north-south and east-west routes.</p> <p>These dark corridors would be achieved through the use of the following lighting design features:</p> <ul style="list-style-type: none"> • Narrow Spectrum lights with no UV content; e.g. warm white (<3500K) LED. • Variable lighting regimes (motion sensors or part night lighting) in areas close to hedgerows and trees. • Directional downlights - illuminating below the horizontal plane. • Reducing the height of light units (whilst ensuring light does not spill above the vertical plane). • Use of use of fore/rear shields to restrict light direction. • Avoidance of upward light (e.g. ground mounted floodlights up-lighting trees, buildings and vegetation).

NSC comment	Response
	<p>As detailed in the EclA report, separate construction and operation phase lighting plans would be prepared following receipt of outline planning approval, and would be subject to review by an ecologist with any lighting along adopted highways subject to agreement with North Somerset Council. The lighting design for the site during operation would seek to provide adequate lighting within the public highways for basic security and orientation of residents, whilst controlling light spill to the ecologically sensitive areas. The design team have reviewed the dark corridors plan and subject to detailed design at the reserved matters stage are content that appropriate dark corridors could be achieved. Full adherence to the parameters set out above and in Appendix 1 could be secured by Planning Condition.</p>
<p>Reinterpretation of the existing bat data for both sites, to provide increased detail, as requested by the NSC Ecologist and Natural England.</p>	
<p><i>“Information on bat registrations (rather than an ‘index’ of bat activity) is required in order to evaluate the importance of the site for bats.”</i></p>	<p>An Excel spreadsheet with the dates and times of all bat registrations recorded within the application area is provided to accompany this technical note.</p>
<p>Further detail of the proposed habitat creation for greater horseshoe bats.</p>	
	<p>A minimum 12m buffer along the River Banwell and a 5m buffer along the southern boundary hedgerow will be allocated as a ‘dark corridors’; refer to Appendix 1 for updated parameters plan. These dark corridors would total 0.2ha (23% of the total site area), and would comprise areas of new landscape planting suitable for foraging bats, including wildflower meadow and native shrub planting.</p> <p>Total areas of new habitat creation within the development suitable for foraging bats are provided below:</p> <ul style="list-style-type: none"> • Wildflower meadow: 0.36ha • Native scrub planting: 0.02ha • SUDs with marginal wetland planting: 0.03ha • Native species-rich hedgerow: 0.29km <p>These habitats would be suitable for a range of invertebrate species and would provide suitable foraging habitat for a range of bat species, including greater horseshoe bat. A Landscape and Ecological Management Plan (LEMP) would be produced to detail how retained and proposed habitats will be managed in the long-term. All detailed measures would align with the parameters set out above, and could be secured by Planning Condition.</p>



NSC comment	Response
Confirmation of status of water vole within the Ebdon Road site	
Clarification of the status of water vole was requested.	An update water vole survey of the watercourse within the site was undertaken on 29 th September 2021; refer to Appendix 2. No signs of water vole were recorded during this survey, or during the 2018 survey of the site. The species was, therefore, considered to be absent from the site.
Confirmation of habitat enhancement for reptiles at Ebdon Road	
Further detail was requested relating to mitigation and enhancement measures for reptiles.	<p>A 'low' population of slow-worm and grass snake were recorded during survey of the site undertaken in 2018.</p> <p>Due to the low numbers of reptiles recorded (a maximum count of two slow worm and one grass snake), and the short grassland sward recorded throughout most of the site which restricted suitable reptile habitat to field margins, a full reptile translocation was not considered appropriate. Instead, a recommendation was made within the EclA for all areas of suitable habitat to be subject habitat manipulation, comprising a two-stage vegetation cut followed by a topsoil strip under ecological watching brief.</p> <p>New habitat creation, in particular the buffer along the river corridor, would provide suitable habitat for reptiles, including wildflower meadow with greater structural diversity than is currently found onsite. Six hibernacula will also be created within this buffer; refer to Appendix 1 for locations. All detailed landscape proposals could be secured by Planning Condition.</p>

Appendix 1: Updated ecological parameters plan



Native shrub planting, hedgerow creation, woodland enhancement planting, and wildflower meadow creation within the public open space would offset habitat loss, and provide habitat for a range of notable species.






Attenuation pond would provide suitable breeding habitat for amphibians. Marginal wetland planting would be suitable for a range of notable species, including amphibians and reptiles.

- Key**
- ★ Reptile hibernacula
 -  Dark corridor (<0.5 lux)
 -  Site boundary

Public realm lighting scheme designed to avoid direct illumination of retained hedgerows and maintain a 'dark corridor' (<0.5 lux) along the adjacent river Banwell.

The layout incorporates a minimum 12m buffer between the river and built development. There would be no public access to this area.

Habitat creation

-  Hedgerow enhancement planting 0.074km
-  Native hedgerow planting 0.29ha
-  SUDs 0.03ha
-  Native shrub planting 0.02ha
-  Wildflower meadow 0.36ha
- ★ Reptile hibernacula

Hedgehog passes created within new residential garden fences to allow movement post-development.

Retained 'defunct' hedgerow would be enhanced with native hedgerow species.

Bat and bird boxes incorporated within the fabric of new buildings. Average of one box per residential unit.



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Mead Realisations

Land at Ebdon Road, Weston-super-mare

Ecological Parameters Plan

Date: 07/10/2021

Appendix 2: Update water vole survey

Water vole survey results

1 Methodology

An update water vole survey of the watercourse within the site boundary was undertaken on 29 September 2021. The water vole survey followed standard methodology (The Mammal Society, 2016), which involved recording signs of water voles including burrows, latrines and feeding remains.

Binoculars were used to survey the eastern bank of the watercourse, which could not be accessed directly as it lies within separate land ownership.

2 Results

No evidence of water vole was recorded during the survey.

3 References

Strachan R and Moorhouse T (2006). Water Vole Conservation Handbook, 2nd Edition. Wildlife Conservation Research Unit (WildCRU), Oxford University.

Dean, M., Strachan, R., Gow, D. and Andrews, R. (2016). The Water Vole Mitigation Handbook (The Mammal Society Mitigation Guidance Series). Eds Fiona Mathews and Paul Chanin. The Mammal Society, London.