

24th September 2024
our ref: P-07942/TC

To whom it may concern:

Note on Red Line Boundary and Interaction with Biddle Street SSSI

The Biddle Street SSSI extends into the redline boundary on the western edge of the site by approximately 6m. This was not identified during the initial assessment as the citation describes the importance of the water courses for both botanical and invertebrate diversity. A 6m buffer extends from beyond the edge of the rhyme which provides a buffer zone to the nationally important habitat present within the rhyme. This buffer zone can also support a diverse bankside flora of importance which is noted within the citation.

Whilst this overlap was not identified within the ecological impact assessment, the importance of providing a buffer to both the SSSI and more generally the ditch and water courses which surround and crisscross the site has been addressed within the scheme design which includes the following mitigation and enhancement measure which are designed to improve the condition of the Biddle Street SSSI this feature in the long-term.

Measures to protect and enhance the Biddle Street SSSI include the following:

- Providing a substantial undeveloped buffer to the SSSI and the Strawberry Line beyond;
- As described within the EclA buffers of between 6 and 9 meters will be provided along all ditches (which includes the Biddle Street SSSI) to ensure future management requirements are not hampered. As such, whilst the landscaping plans show woodland planting in this area, in practice there would be a buffer which extends at least 6m and up to 9m from the ditch. This would ensure that the area of the SSSI, as it extends into the redline boundary is protected from any planting or development activity;
- Landscaping proposed which includes woodland planting and grassland enhancement will buffer the SSSI from recreational impacts from within the residential parts of the site. It should be noted that landscaping proposals provided with the application are indicative only, hence the buffer zones committed to within the ES are not reflected on the plans. A detailed landscaping layout which reflects these details would, we anticipate, be secured by condition;
- The change in land use will reduce agricultural pressures and reduce the potential for runoff associated with agriculture negatively impacting the SSSI;
- Funding of a dog waste and a general litter bin at the junction to the site with the Strawberry Line including funding of collection of waste and litter picking of the path, as outlined in section 3.4.14 of the EclA.

North Somerset's Policy CS4: Nature Conservation (Core Strategy January 2017) requires that development should be "**seeking to protect, connect and enhance important habitats, particularly designated sites, ancient woodlands and veteran trees**". In addition Policy DM8 (Development Management Policies July

2016) states ***“Development within or in proximity to a Site of Special Scientific Interest (SSSI) or National Nature Reserve that is likely to have a direct or indirect adverse affect on its biodiversity or geological interest would not normally be permitted.”***

The measures described above will secure an appropriate protection of the Biddle Street SSSI, both during construction and operation and will ensure there will be no adverse effects upon the designated site. Further the removal of agricultural pressure from the adjacent farmland together with the protection of Biddle Street SSSI from any adverse effects associated with recreational pressure stemming from the development will help to ensure the scheme contributes towards an enhanced condition for this nationally important site. As such the scheme is considered to be consistent with the local policy requirements.

It should be noted that this issue has not previously been raised by the LPAs ecologist and it is not thought that the protection and potential for the scheme to contribute favourably towards the conservation status of the Biddle Street SSSI is in dispute.

I trust that the above information is clear. If additional information is required on this or other matters please do not hesitate to contact me.

Kind regards,

A handwritten signature in black ink, appearing to read 'Tom Clarkson', with a small dot at the end.

Tom Clarkson BSc MSc DIC MCIEEM
Managing Director