

Technical Note: Ecology Update Response

Date: 25 March 2026

Introduction

- 1.1 This note is submitted in response to the Ecology consultation response dated 5 March 2026, which requests further information in relation to:
- i. Habitat proposed to be lost;
 - ii. External lighting; and
 - iii. Mitigation for the loss of potential bat foraging habitat.
- 1.2 The information below should be read alongside the submitted Preliminary Ecological Appraisal prepared by All Ecology (September 2025) and Dusk Emergence Survey for Bats prepared by All Ecology (September 2025).

Habitat Proposed to be Lost

- 1.3 The submitted Preliminary Ecological Appraisal already identifies the habitats present on the site. In summary, the site comprises buildings, hardstanding, an area of poor semi-improved grassland to the west/rear of the site, and a species-poor hedge along part of the northern boundary. The grassland is described as species-poor modified grassland and the hedge as an overgrown native hedgerow.
- 1.4 The PEA further confirms that the site is composed of common habitats of generally low to moderate ecological value, that the hedge will be retained, and that the grassland will be lost. It also confirms that the grassland is species-poor and does not qualify as priority habitat.
- 1.5 For clarity, the extent of habitat loss arising from the development is as follows:
- Existing poor semi-improved grassland within the application site: 486m²;
 - Area of existing poor semi-improved grassland to be lost: 486m²;
 - Area of replacement / newly landscaped grassland to be provided: 163m²;
 - Existing hedgerow retained; and
 - Proposed hedgerow planting of 41 linear metres.

1.6 For the avoidance of doubt, the applicant confirms that:

- The grassland affected comprises existing poor quality, species-poor semi-improved grassland;
- It is not priority habitat; and
- All existing hedgerows will be retained and extensive area of new hedgerow planting are proposed.

1.7 This quantified information can be cross-referenced against drawing no. 2834 P100 Rev F.

External Lighting

1.8 The Ecology response requests clarification as to whether any external lighting is proposed and, if so, its type and location.

1.9 The submitted bat survey already addresses lighting and recommends that external lighting be kept to a minimum in line with best practice, given the need to minimise impacts on bats and other wildlife. It recommends that lighting should be installed only where absolutely necessary and that any such lighting should comprise highly directional warm white LED fittings, with PIR activation and short cut-off periods, in order to minimise light spill.

1.10 In response, it is confirmed that no external lighting is proposed.

Mitigation for Loss of Potential Bat Foraging Habitat

1.11 The Ecology response seeks clarification on mitigation for the loss of potential bat foraging habitat, together with details of proposed planting and bat roosting features.

1.12 The submitted bat survey confirms that:

- No bats were recorded emerging from any building;
- No roosts were identified within the buildings on site;
- Recorded bat activity comprised only low levels of foraging by common pipistrelle, together with a single serotine pass and two noctule passes; and
- No further surveys are required at this time.

- 1.13 The bat survey also concludes that, in the absence of mitigation, the only material bat-related impact would be temporary/permanent disruption of small areas of foraging habitat on site and adjacent through changes in external lighting, and expressly states that mitigation is possible.
- 1.14 The submitted PEA similarly records that the site is largely unvegetated, with poor connectivity to the wider landscape, and that the north hedge provides only limited connectivity into the immediate surroundings before terminating.
- 1.15 Against that background, the proposed mitigation is as follows:
- Habitat mitigation / landscaping
 - Retention of all existing hedgerows on the site;
 - Provision of replacement soft landscaping associated with the completed development;
 - Planting to comprise native hedge species / native grassland mix / ornamental + native mix as appropriate;
 - Reinforcement of the site's landscaped edges to ensure that the completed development includes vegetation of greater ecological function than the existing unmanaged species-poor grassland alone.
 - Bat enhancement measures:
 - 2 integrated bat boxes / bat tubes within the fabric of the new dwellings;
 - Siting on suitable elevations away from principal light sources; and
 - Installation will occur prior to occupation.

Conclusion

- 1.16 The further information requested by the Ecology Officer is capable of being addressed through clarification rather than any change in the underlying ecological assessment.
- 1.17 The submitted ecology reports already establish that:
- The site contains an area of species-poor poor semi-improved grassland and a species-poor hedge;
 - The grassland is of limited ecological value and is not priority habitat;
 - The bat roost potential of the buildings is minimal, no bats were recorded emerging, and no roosts were identified;

- Bat activity recorded on site was limited and comprised low numbers of common/light-tolerant species;
- No further bat surveys are required; and
- Any limited impact associated with the small area of foraging habitat and potential lighting changes can be appropriately mitigated.

1.18 This technical report comprises a proportionate response to the minimal loss of low-quality ecological habitat. It is considered that with the submission of this additional information the holding objection should be capable of being removed and that the Council can proceed with the HRA / Appropriate Assessment on the basis of the clarified information and proposed mitigation set out above.