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W: middlemarch.eco
T: 01675 525 880

Holly Martin
Stantec
(Sent via Email)

Ref: RT-MME-159232-02

1st September 2023

Dear Holly

**Land West of Hither Green, Redditch – Response to Ecology Comments by Thompson Ecology (Dated 25th August 2023)**

I have reviewed the ecology comments from Thompson Ecology detailed in their letter dated 25th August 2023. Our response to the pre-determination clarifications comments are as follows:

***Clarification is required as to why Metric 3.0 was used, instead of the newer 3.1 or 4.0 metrics. It is assumed that this is due to continuity with previous metrics that were produced at the start of the project; however, this choice is not addressed in the report.***

It is correct to state that the use of Biodiversity Metric 3.0 in this application was to ensure continuity throughout all stages of the planning application. The original calculations were carried out in September 2021 just after release of Biodiversity Metric 3.0 and so were undertaken in accordance with the prevalent metric, condition assessment and guidance at the time. The offsite assessment, detailed in the offsite Biodiversity Net Gain Concept Plan (Report RT-MME-157753) was similarly undertaken using 3.0 guidance, which was still the primary metric at the time of field survey, until the release of Biodiversity Metric 3.1 in April 2022 immediately prior to the issue of the report in May 2022. To ensure continuity with the onsite calculations, the offsite calculations were similarly completed in Metric 3.0 in accordance with the metric guidance at the time for ongoing projects.

The Framework Biodiversity Net Gain Plan (Report RT-MME-159232-Rev C), which was originally issued in October 2022, was produced to consolidate all existing information about avoidance, mitigation and compensation proposed as part of the development. This included clarification on matters raised by Worcestershire Wildlife Trust in our meeting on 28th September 2022. Apart from some non-material amendments to the offsite proposals, there were no changes to the on-site scheme that warranted a revision of the biodiversity metric to version 3.1, and so the biodiversity calculations remained as originally submitted in 2021.

There have been some minor amendments to the on-site scheme during 2023 which have resulted in implications for the site layout. These changes have had a non-material effect on biodiversity (principally involving minor changes in areas of amenity grassland and gardens spaces) with no, or minor beneficial change, in the final calculation overall. It was therefore not considered necessary to rework the original calculations to metric versions 3.1 or 4.0.

Adaptations to the guidance and metric tool in versions 3.1 and 4.0 mean they are largely incompatible with version 3.0 and so metric changes at this stage could alter existing biodiversity scores with subsequent implications for site layout or design (and re-assessment of the baseline using amended condition criteria). It is considered that the biodiversity net gain calculations provided were undertaken using a recognised and standard metric tool using available guidance at the time. They subsequently provide a robust evaluation of both the pre- and post-

development baseline to determine the likely change in biodiversity value that may occur as a result of the development proposal and so are sufficient for decision-making about compliance with planning policy.

***Section 2.3: Have the impacts of increased recreational use of surrounding habitats been considered for the various receptors? Impacts may include walking/trampling of habitats, noise disturbance, predation and disturbance by pets etc.?***

The effects of increased recreational use have been considered as part of site design. Notably, the target condition of all proposed on-site landscaping has been assigned a pre-cautionary score of 'Moderate' condition reflecting that some recreational usage will restrict the attainment of certain condition criteria necessary to achieve 'Good' condition. Recreational use will be managed, in part, through good practice design, such as the installation of a surfaced footpath to channel footfall away from more sensitive areas. Further access management will be a consideration of the future Landscape and Ecology Management Plan (LEMP), which will be prepared and secured by way of planning conditions.

Noise disturbance effects during the construction phases will be managed in accordance with the Construction Ecological Management Plan (CEcMP) for the site (See Report RT-MME-153160-06_Rev C). The proposed operational use of the site (residential) is not considered to lead to significant increases in noise generation at the site given the site's context adjacent to an existing residential area and road to the east and north of the site respectively. It is acknowledged that visual movement of cars and pedestrians will have some temporary displacement effects on species groups such as reptiles and nesting birds, however such effects are unlikely to lead to long-term displacement of these species and the retention and connectivity of habitat opportunities on and offsite will provide options for species to move to less disturbed areas of the site in response to localised disturbance effects. It is noted that the site is already partially used as an active golf course with a well-used public footpath that crosses towards the south and so the species receptors currently on site will likely be adapted to low levels of recreational disturbance.

The impact of predation by pets is more challenging to characterise and thus manage as part of any targeted mitigation. Whilst it is inevitable that some predation by domestic pets will occur, there is no evidence to suggest that the rate of predation will significantly increase beyond the baseline levels provided by the current residential population adjacent to site. Mitigation will therefore be targeted towards ensuring that the on-site landscaping is maintained in target condition to provide ample opportunities for dispersal and predator avoidance. Other measures will be considered as part of the LEMP wherever possible.

***Section 6.3: The justification for 'cross-trading' of habitats, i.e. replacing grassland habitats with woodland and scrub of equal or higher Biodiversity Units (BU) score, is acceptable. However, consideration should also be given to including some high distinctiveness grasslands, such as Floodplain Wetland Mosaic and Coastal and Floodplain Grazing Marsh (FWM-CFGM), or acid/calcareous grassland (subject to the presence of suitable soil conditions), as well as the high distinctiveness Woodland and Reedbeds habitats. Although these grassland habitats may not result in as high BU score per area unit as woodland, they require a significantly shorter time to mature and therefore will establish and provide their full benefit to wildlife sooner than the woodland habitats.***

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The scheme has been designed to incorporate habitats that are both desirable (from the perspective of on-site biodiversity and local biodiversity targets) and achievable on site. Habitats of high distinctiveness, whilst preferable, are considered to be less viable in a residential setting due to both recreational pressures (see comments regarding precautionary scores for recreational impacts) and limitations for management (e.g. grazing as a management option for Coastal and Floodplain Grazing Marsh). Environmental constraints on site are similarly restrictive in terms of soil pH and nutrient status (acid and calcareous grassland). New areas of the higher value habitat - reedbed are, however, proposed in the pond features to the north and south of the site, and the LEMP will seek to deliver biodiversity value beyond the target habitat conditions given, wherever possible. The target habitat types and conditions proposed are therefore considered to balance the biodiversity needs of the site with a realistic but precautionary estimation of the achievable biodiversity value.

The target for woodland gains is driven by woodland being a Habitat of Principal Importance and local priority in the Local Biodiversity Action Plan. Whilst new areas of woodland are proposed, part of the strategy is to focus on enhancing existing areas of woodland (currently modified due to use in the golf course) and so the biodiversity benefits are likely to be released sooner than if all new areas of woodland were created from scratch.

***It is recommended that a Section 61 Notice is established to safeguard the off-site compensation area from future developments, and to ensure the delivery of the 30-year management and maintenance requirement.***

I am unfamiliar with a Section 61 notice and the purpose of its use for securing an offsite biodiversity compensation scheme. In my experience, an offsite biodiversity scheme is secured by a Section 106 agreement, either through the linking of the on and off-site compensation through the Section 106 for the development scheme as a whole or through an independent S106 agreement between the local authority and the offsite offset provider. The Environment Act 2021, and subsequent guidance to date, indicates that all offsite offset schemes will only be valid for registration on the national registry if they are underpinned by a Section 106 or conservation covenant. As such the S106 route would appear to be a more appropriate legal mechanism to secure long-term offsite delivery. A requirement for a Habitat Management and Monitoring Plan (HMMP) or Habitat Enhancement and Management Plan (HEMP) for the offsite areas within the Section 106 would secure the long-term delivery of the offsite compensation measures proposed.

Best regards

Richard Wheat ACIEEM
(Principal Consultant)

Checked and Approved by
Dr Amanda Flint
(Biodiversity Manager)