

# South Gloucestershire Council

Department for Environment and Community Services  
Strategic Planning Policy and Specialist Advice  
PO Box 1954  
Bristol  
BS37 0DD

**Memorandum to:** Charmian Eyre-Walker

**From:** Benjamin Goodger

**cc:**

**Date:** 29<sup>th</sup> March 2023

**Your Reference:** P22/01300/O

**Our Reference:**

**Location:** Land at Sodbury Road Wickwar South Gloucestershire GL12 8PG.  
**Description:** Erection of up to 180 dwellings, a local shop and associated infrastructure (Outline) with access to be determined; all other matters reserved.  
**Reference No:** P22/01300/O

Dear Charmian

I have reviewed the Addendum to Ecological Appraisal and Biodiversity Net Gain Calculations, both prepared by EDP in February 2023. I have also reviewed the revised Masterplan and Landscape Strategy.

I am satisfied that these documents have sufficiently addressed the ecology comments of 8<sup>th</sup> February 2023 made by Arup on behalf of the Council. The revised scheme demonstrates additional ecological enhancements, as reflected in the new Biodiversity Net Gain (BNG) calculations. I note that additional measures are proposed to further reduce potential impacts from recreational pressures on Lower Woods SSSI.

**Requirements prior to determination:**

None.

**Requirements prior to commencement / conditions to be attached to planning consent:**

1. The mitigation measures that apply to the site clearance and construction phase of the development should be included in a Construction Environmental Management Plan (CEMP), with detailed Method Statements. It should include all the measures detailed in the Ecological Appraisal and Addendum to the Ecological Appraisal, including those proposed for GCN in accordance with the EPS Mitigation Licence or the District Licence. The CEMP should be submitted and approved by the LPA.
2. The mitigation and enhancement measures outlined in the Ecological Appraisal and Addendum to the Ecological Appraisal should be expanded on in the form of a Landscape and Ecology Management Plan (LEMP), including longer-term

management and monitoring activities. Management should be applicable for a minimum period of five years, although in relation to BNG this is to be for 30 years and include a monitoring regime to ensure habitats establish well and that wildlife features remain in good condition. It should include all the measures proposed for GCN in accordance with the EPS Mitigation Licence or the District Licence. It should also include plans showing locations and extent of all habitats and wildlife features, and a timetable of activities. A Responsible Person / organisation needs to be stated and the method by which the protection of retained and created habitats and open spaces will be secured. The LEMP should demonstrate that the BNG proposed in the BNG assessment has been achieved. It should be submitted and approved by the LPA.

3. Prior to commencement, details of external lighting should be submitted to and approved in writing by the LPA. The details should clearly demonstrate that lighting will not cause excessive light pollution or disturb or prevent bat species using key foraging / commuting corridors and habitat features or accessing roost sites. The details should include, but not be limited to, the following:
  - i. A drawing showing sensitive areas and/or dark corridor safeguarding areas
  - ii. Description, design or specification of external lighting to be installed including shields, cowls or blinds where appropriate.
  - iii. A description of the luminosity of lights and their light colour including a lux contour map
  - iv. A drawing(s) showing the location and where appropriate the elevation of the light fixings
  - v. Methods to control lighting control (e.g. timer operation, passive infrared sensor (PIR)).

All external lighting should be installed in accordance with the specifications and locations set out in the approved details. These should be maintained thereafter in accordance with these details. Under no circumstances should any other external lighting be installed unless agreed with the LPA.

4. The LPA would require receipt of the GCN EPS Mitigation Licence or the District Licence certificate prior to commencement.

*National Planning Policy Framework (NPPF) and Local Plan Policy (South Gloucestershire Local Plan: Policies, Sites and Places Plan (PSP) (adopted November 2017)) context:*

- *NPPF Para 170 - 182 (Conserving and Enhancing the Natural Environment, Habitats and Biodiversity), National Planning Policy Framework<sup>1</sup>*
- *PSP18 - (Statutory Wildlife Sites: European Sites and Sites of Special Scientific Interest (SSSIs)) - South Gloucestershire Local Plan (PSP Plan)*
- *PSP21 (Wider Biodiversity) - South Gloucestershire Local Plan (PSP Plan)*
- *CS9 (Managing the Environment and Heritage) - Core Strategy*
- *CS2 (Green Infrastructure) - Core Strategy*
- *PSP3 (Trees and Woodland) - South Gloucestershire Local Plan (PSP Plan)*

*The Environment Act 2021 contains provisions for the protection and improvement of the environment, including introducing Biodiversity Net Gain (BNG).*

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<sup>1</sup> The NPPF Paragraph 179 states: "To protect and enhance biodiversity and geodiversity plans should: b) ... identify and pursue opportunities for securing measurable net gains for biodiversity."

*Wildlife legislation context:*

- *Wildlife and Countryside Act 1981 (as amended)*
- *Conservation of Habitats and Species Regulations 2017*
- *Natural Environment and Rural Communities (NERC) Act 2006*
- *Protection of Badgers Act 1992*

I trust this information is helpful.

Kind regards

**Benjamin Goodger**  
**Ecological Planning Advisor**