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18<sup>th</sup> July 2024

Re. PL/2025/02647 Outline Planning Permission for up to 30no. Dwellings with all matters apart from access reserved for future consideration

Dear Sir/Madam,

I am writing with regard to the above application and the comments received from the Council's Ecologist regarding the need for further surveys for protected species (bats, Dormouse, GCN reptile, a grassland assessment in the optimal season and subsequent amendments to the BNG baseline metric.

#### Grassland Assessment

The original grassland assessment was carried out in January which is a sub-optimal time of year for these surveys. It was however possible to classify the grassland, which has been left unmanaged and has the appearance of a more interesting sward, as this had only recently been the case. Nevertheless, an updated grassland assessment was carried out in June 2025 to provide confirmation of both classification and condition, which we found to be the same as previously recorded and used in the BNG metric. Details are provided in an updated PEA.

#### Protected Species

Dormouse – The hedges and trees provide the main potential habitat for this species. Surveys were carried out by LC Ecological Services in 2014, 2016, 2020 and 2021; these did not record any evidence of presence across a wider area than the current site boundary. It is acknowledged that that last of these surveys is considered to be out of date but the likelihood of Dormice having colonised the site is minimal, and in any case, the habitats for this species will be retained. Further surveys would be disproportionate to the low risk of presence and the impact should they be present given that their habitat will be retained.

Bats – The site provides potential bat foraging and commuting habitat associated with boundary hedgerows and trees; the open grassland within the field offers little value. Previous surveys monitoring bat activity associated with the site carried out by LC Ecological Services concluded that the site is of regional importance to bats but given the scale of proposals which result in the clearance of generally low value habitat, the magnitude of adverse effects as a result of the development is expected to be "at worst low and of minor significance" (LC Ecological Services Ltd, 2022). No significant changes to the key on-site habitats were recorded and bat activity associated with the site is expected to be similar to that previously recorded. The loss of grassland and small pockets of scrub is not deemed significant and the key habitats, hedges and trees, will be retained. New gardens will provide new habitat with limited foraging value. Provided that lighting of the field boundary hedgerows and trees is avoided, regardless of any changes in activity on site since the last

round of activity surveys were carried out, no significant impact to bats is predicted due to the retention of the main habitats, and further surveys are not deemed necessary.

Reptiles – The site provides suitable habitat for reptiles mostly associated with hedgerows along field margins and small pockets of scrub. Previous surveys carried out by LC Ecological Services recorded low populations of Common Lizard and Grass Snake in the southern part of the current application site and these low populations are expected to remain present given that these site habitats remain largely unchanged. There would however, be a loss of this habitat so an updated survey was set up in June 2025 and began in July. At the time of writing the survey is on-going but has recorded two Common Lizards to date. Regardless of the outcome, the mitigation strategy proposed will ensure that the risk of harm to these species will be reduced to negligible and new hibernacula will be created to enhance the development for these species.

Great Crested Newts – A desk study and site survey have determined that there was minimal likelihood of this species being present. Ponds in the surrounding area are mostly isolated from the site or poorly connected, the exception being a single pond within a farm complex 225 m to the west of the site. A HSI Assessment of this pond in January 2025 determined this pond to have a rating of poor, scoring 0.43 which is well below the 0.5 threshold at which further surveys are usually required. A return visit in June with the intention of collecting samples for eDNA analysis found the pond to be even poorer condition and clearly extremely poor for this species. Permission for collection could not be obtained and based on the poor condition of the pond, no further attempts were made to collect samples as it is clear that the likelihood of GCN being present is negligible. The mitigation strategy for reptiles would also minimise any risk to GCN in the highly unlikely event they are present on site.

BNG

Following the June survey assessment of the grassland, it was confirmed that no changes to the metric baseline were required except an adjustment to the site area to bring it in line with other documents. At the request of the ecologist, an updated UKHab Baseline Habitat Plan will be provided with the hedgerows identified on the plan and the separation of the small area of poor condition grassland from the remainder of the grassland in good condition.

I trust the above is acceptable. If you require any additional information, please do not hesitate to contact me.

Yours faithfully

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