

APPENDIX - 6 Norfolk Wildlife Trust Comments:

Whilst we have no objection to the proposal in principle, we are concerned about the baseline survey evidence and some of the management prescriptions, which we believe would inadvertently damage the CWS. We therefore object to the application as it currently stands. With revisions to the management plan and appropriate conditions, and Biodiversity Net Gain calculations based on botanical surveys in season, we would be prepared to review our position. Our comments are given in more detail below.

Impacts on Old Pollard Wood CWS

Loss of area of waxcap grassland – section 5.3.2 of the EclA notes that there would be a pre-mitigation moderate negative impact, significant at a regional scale, due to proposed works to the existing footpath network around the main building. Beyond the generic Biodiversity Net Gain (BNG) provisions, which do not include waxcap diversity in their calculations, we can find no specific mitigation measures in section 6 of the EclA which would mitigate or compensate for these impacts. Whilst it is possible that a post-consent Habitat Management & Monitoring Plan (HMMP), as mentioned in section 6.2.2 of the EclA, could address this, we recommend that the EclA includes a clear indication of how this impact is intended to be addressed. For example, we note in section 5.4.40 that the Grounds Management Plan indicated that waxcaps used to be present in grassland area G5, so this may present an opportunity for targeted management to deliver mitigation. Grassland Area G7 – section 4.2.17 of the EclA incorrectly states that area G7 is not within the CWS designation, whilst our records indicate that it is. We recommend that the mapping is reviewed and changes to the EclA and BNG reports made accordingly. Woodland - The EclA states that there will be minor negative temporary impacts at a county scale, to a small part of the CWS during the construction and operation phases. Clear requirements for mitigation during these periods should be secured by condition, ideally through a Construction Environmental Management Plan (CEMP) and a HMMP, including a lighting strategy. We support the proposals outlined in the Woodland Management Plan (WMP) to deliver positive impacts to the CWS through the reduction and management of invasive species (Rhododendron) and deer control. In addition to the WMP, we recommend that any new planting is avoided wherever possible and left to natural regeneration. Where this isn't possible, then we recommend a condition that new planting is only from locally sourced seed or proven local provenance stock, to best incorporate with the existing woodland and avoid increasing risks of tree disease. Grassland seed – the management proposals for grassland improvement outlined in paragraphs 5.3.5 – 5.3.9 of the BNG report, must not happen on the grasslands within the CWS (this includes G7 and G1). We are also concerned at the proposals in sections 6.3.11-6.3.12 of the EclA to use commercial seed mixes to enhance existing areas of the CWS, including the proposal in sections 6.3.6 and 6.3.8 of the EclA to use imported Yellow Rattle seed to improve grassland diversity. Yellow rattle is not naturally part of the grassland sward in the CWS, instead we recommend that area G7 is managed with a mid-late summer cut and removal of material, whilst G1 could be improved botanically if mown less regularly, and this would also benefit wax caps and similar fungi species¹. Therefore, we strongly recommend that these measures are removed from any management plans for the site.

Further Surveys Needed

Protected species - the EclA notes potential impacts on a number of legally protected species. The presence of protected species on an application site is a material concern and sufficient surveys and mitigation measures must be presented with the application in order to satisfy the legal protection provided. We recommend that the recommendations in sections 5.5.2 (bats), 5.4.29 (reptiles) and 6 (great crested newts) are made conditions of any consent in order to ensure adverse effects on protected species are avoided. The Preliminary Ecological Assessment (PEA) also requires a breeding bird survey on the camping field and surveys for nesting barn owls and red kites, transect and static bat surveys for any areas affected by increased lighting and surveys for water vole, otter and badgers. No results have been

submitted for these. Paragraph 4.2.93 of the EclA also states that further bat emergence surveys in May to August are required for the certain buildings which were found to have low bat roost potential. Habitats - the Preliminary Ecological Assessment (table 5.1) identifies the need for further surveys of fungi on the west lawn and camping field to identify the extent of rare/threatened species. This has not been provided. It also states a requirement for additional Phase 2 surveys of rare and scarce plants in May – July, which is also still needed. We therefore recommend that no decision is made until results of these further surveys have been provided and any necessary updates to the EclA and BNG reports made and consulted on. Whilst we are aware that the BNG report presented at this time will only be informative as the sign off of the BNG plan formally occurs post consent, we wish to highlight that due to the survey timings, the existing baseline is likely to be inaccurate and will need updating based on additional surveys prior to any sign-off. Monitoring The HMMP will require habitats on Site to be maintained in accordance with the plan for 30 years. Given our historical familiarity with the CWS, we would be happy to discuss a role for us with the monitoring. Conclusion Whilst we are not opposed in principle, there are outstanding impacts on the CWS which do not appear to have been sufficiently covered in the ecology reports submitted with the application, and the BNG report appears to be based on survey data from out of season, therefore we object to the proposal as it currently stands. We would be happy to review our position should further information be provided. We trust that our comments have been helpful and would be happy to discuss them further with the Council and the applicant if that would be useful. Please can we be consulted on any further ecological information provided with the application and informed of any committee date, as we may wish to speak in support of our position. Please can we also be informed of the outcome of this application.

Further comments received 02.08.2024

Conclusion We welcome the new proposals which are an improvement, however we still consider that significant harm would result unless mitigation is put in place. If consented, we recommend that:

- The updated Core Campus Masterplan is taken forward to guarantee that no lowland dry acid grassland will be lost to new footpaths
- A Habitat Management and Monitoring Plan (HMMP) should be made a condition of consent. This must include measures to mitigate impacts on grassland G5 and G6.
- There is an adequate Construction Environmental Management Plan (CEMP), HMMP and a lighting strategy to ensure mitigation of ground disturbance in woodlands during construction operations. This should be secured by planning conditions.
- A condition relating to local provenance stock for tree planting using local nurseries where possible and locally appropriate species.
- NWT would like to be consulted on the draft HMMP and CEMP.
- A lighting design strategy for biodiversity should be made a condition of planning consent to minimise nocturnal disturbance during operation.
- Surveys to establish the presence/absence of water vole and otter will be required in order to ensure adverse effects on protected species are avoided, as well as a breeding bird survey on the camping field if any work is to take place in this area We trust that our comments have been helpful, and would be happy to discuss them further with the Council and the applicant if that would be useful. Please can we be consulted on any further ecological information provided with the application and informed of any committee date, as we may wish to speak in support of our position. Please can we also be informed of the outcome of this application.