

### Appendix A – Landscape and Ecology Officer comments on application PF/17/1803

#### Trees, landscaping and habitats

More trees are being lost than are considered necessary but the proposals are on balance considered acceptable subject to being required to provide the tree protection as per the amended AIA reports and landscaping plans.

It is noted that Policy HO9 requires defunct hedgerows to be improved, new hedgerows to be planted to improve connectivity throughout the site, and part of the site should be managed as a meadow for the benefit of invertebrates. The importance of retaining hedgerows of quality should be recognised in the application by using a buffer along the east hedgerow.

Given how little protection and mitigation is offered, it is considered necessary for the scheme to include various ecology enhancement features, including swift boxes, sparrow terraces and other bird boxes, as well as bat boxes and roost installations.

The biodiversity impacts from development on the existing grassland site will be significant and especially so for protected invertebrates. The application considers this can be compensated for by the active provision and management of the remaining grassland as open herb-rich grassland habitat, linked to the scrub and woodland. However, it is considered to be extremely unlikely and ineffective if the space is also required to function as a more general public open space area. This proposal should provide alternative forms of public open space off-site if the loss of, and impact on, habitat is to be mitigated sufficiently.

#### Amended Tree Impacts Details

An AIA has been provided by Haydens Consultants dated 18/1/19. This identifies that four low quality trees or trees of limited longevity, two low quality landscape features and a section of one hedge will need to be removed to achieve the proposed residential and access road layout, together with some minor works to an additional two trees. Some encroachment into the Root Protection Areas (RPAs) of trees/hedges will occur however these are expected to be mitigated through the use of 'no-dig' construction techniques. A section of the eastern hedgerow (approximately 20 to 30m) to the south of the site will need to be removed to allow for the access road. This hedge will allow require pruning (crown reduction) to allow clearance of gardens and parking courts. With the exception of the issues highlighted below, the Landscape Section acknowledge the implications of the development on the trees and landscape features of the site and consider that subject to adequate mitigation and compensation the impacts are acceptable.

A Tree Plan has also been provided by Haydens Consultants dated 17/1/19 (drawing no. 6151-D-AIA), which illustrates the planning layout and the tree constraints on one drawing.

The AIA indicates that T11 (a Category B oak tree) will need to be removed because of the proximity of the access road. While the Tree Plan identifies the removal of the tree and a section of hedge/landscape feature, the plan indicates that replacement trees and hedge will be planted to compensate for the loss of these features (although this is not specified in the AIA report). The submitted Planting Plan 2 of 2 (by IDP Landscape, titled LA3587 – 003 Rev B) illustrates planting with a native shrub mix and the provision of one *Malus* 'Evereste' (apple cultivar) in the same location. The shrub planting is acceptable and will compensate for the loss of the landscape/hedge feature however the *Malus* tree will not compensate for the loss of the oak tree. It is recommended that the planting plan is amended and at least two oak (*Quercus robur*) trees are shown to be planted in the location of the former T11.

The Tree Plan and AIA indicates that Plot 2 is located outside the RPAs of T8 and T9 and that these trees are to be retained. This is acceptable.

#### Tree and hedge conditions:

- L13 – Carry out in accordance with submitted AIA Report. Suggested wording “The development hereby approved shall be carried out in strict accordance with the measures laid out in the approved Arboricultural Impact Assessment document, prepared by Hayden’s Arboricultural Consultants dated 18<sup>th</sup> January 2019. This shall include the implementation of the recommendations of the report in full, tree surgery in accordance and within the specified timeframes identified in the Schedule of Trees, provision of a detailed Arboricultural Method Statement and Tree Protection Plan to include: fencing type, ground protection measures, no dig surfacing, access facilitation pruning specification, project phasing and an extensive auditable monitoring schedule.”
- L12 – In association with the above requirement the provision of an Arboricultural Method Statement (AMS) and Tree Protection Plan will be required prior to commencement of development on the site – *development* includes the removal of any materials or vegetation on site, the provision of access roads within or to the site, installation of any services, or the demolition of any structures on the site.

#### Protection of Designated Sites and on-site mitigation

The site is only 400m from the nationally protected Holt Lowes Site of Special Scientific Interest (SSSI), which forms part of the internationally designated Natura 2000 site network known as the Norfolk Valley Fens Special Area of Conservation (SAC), sited adjacent to Holt Country Park. In addition, the site is only 6km from the North Norfolk Coast which includes various SAC and Special Areas of Protection (SPA) and Ramsar sites.

These designated and protected sites will all be subject to varying degrees of impact from resident’s recreational demands. These likely impacts should be monitored and managed, through the required financial contribution for SPA/SAC monitoring as required by Site Allocation Policy HO9.

In addition, the impacts need to be avoided or reduced in the first place, through mitigation. These mitigation measures need to include (i) the essential provision of suitable public open space, including links to public rights of way and footpath networks, for purposes of dog walking and general recreation; and (ii) the provision of developer contributions for providing improved public access to- and facilities within- Holt Country Park which will need to absorb the impacts being diverted away from international sites.

An ecological assessment of the likely possible impacts on international and nationally-protected sites has been provided. Some initial concerns were raised, namely:

- Lack of confirmation from utility providers that there is foul drainage capacity sufficient to treat foul waters and avoid flooding / permit exceedance affecting ecological sites.
- Lack of confirmation that there is sufficient water supply available to avoid the need for more abstraction which would remove essential water from the Norfolk Valley Fens SAC groundwater resource, on which it depends.
- Increased use of Holt Country Park for dog walking will lead to more use of the adjoining Holt Lowes heath habitat which will suffer increased erosion and dog faeces contamination to which it is very sensitive. This needs avoiding / managing.
- The North Norfolk Coast SAC and SPA areas will be eroded and degraded by increased recreational impacts, the extent and magnitude of which were not initially assessed by the applicant.

It is important that any on-site provision of mitigation in the form of alternative open space is managed effectively to substitute the allure of regularly visiting the designated sites, and in this case the open space needs to be publically accessible but also semi-natural in character, so providing grassed informal play areas, for example, would not be appropriate. The application proposes approximately 1.4ha of “suitable alternative greenspace” (SANG), in comparison to the assessment that a minimum of 0.76ha should be provided. Features such as dog waste bins and signage would be needed as well.

However, addressing the likely impacts on international sites is but one of many important ecological functions required of this open space.

Whilst the SANG proposal may seek to address the impacts on international sites arising from the scale of development and proximity of the development to these sites, there is concern that the SANG offered does not account for the additional need to provide multiple functions.

These additional requirements include:

- Providing essential ‘standard’ forms of public open space for residents, as required by any development of this scale;
- Providing a suitable ‘buffer strip’ to the adjoining County Wildlife Site;
- Providing compensatory habitat for the loss of grassland by development; and,
- Providing meadow planting to improve invertebrate habitat and biodiversity.

In combination, it is the Landscape and Ecology Officer’s considered assessment that the development does not provide sufficient on-site publically-accessible open space, when trying to feature all these varying requirements to address and mitigate the scale and impact of the development proposal.

Furthermore, the functional requirements of the overall public open space demand that certain areas will need to be segregated, and possibly cordoned-off from public access, for the different impacts to be mitigated effectively. Proposing a Management Plan for these different areas will need very careful consideration, and could be difficult to work effectively.

### Financial contributions

The initial £50 / dwelling was proposed to address all of the open space requirements, when in fact the policy-based figure is intended solely for the monitoring and assessment of the impacts on the Natura 2000 sites (ie the North Norfolk Coast and Norfolk Valley Fens SPA/SAC areas), and not for any management or mitigation of those impacts.

Nothing has been proposed for mitigation through improved access and facilities at Holt Country Park, for example.

Since the original comments were provided, the Council has been required to increase the SPA/SAC visitor impact mitigation contribution from £50/dwelling to £205.02p per dwelling.

### Impacts on other ecological sites

Approximately 25% of the County Wildlife Site (CWS) is within the application site, albeit the area is shown for use as open space. Nevertheless, detrimental impacts will be likely.

The proposals include an appropriate area of buffer strip land between development and the CWS, but its effectiveness in avoiding excess recreational pressure and dog fouling will be hard to manage.

The application has found that even with mitigation around the CWS there will still be an adverse impact from habitat isolation and fragmentation, resulting in a “moderate-adverse” effect on the habitat, which the applicant suggests is of only local/district value. However, this is contended as the CWS designation should mean that this site is of a wider county-scale value, and the so value and extent of mitigation should increase accordingly.

The application suggests that the loss of 80% of the application site’s existing and valuable un-improved grassland habitat is able to be compensated by the enhancements made to the County Wildlife Site through management, so creating a “neutral” effect on the development’s ecological impacts. However, this is greatly contested because the scheme involves loss of existing habitat, increased recreational pressure, no means of controlling that pressure, and offers no proposals for management of the County Wildlife Site, and therefore the development will degrade the CWS and cause the loss of good quality unimproved natural grassland habitat. As such, in combination, it cannot be said that the scheme avoids a detrimental impact on ecology and biodiversity.

Furthermore, it is considered likely that the need to provide ‘Suitable Alternative Greenspace’ to offset the recreation pressures of international sites, and the requirements for providing public open space, will both conflict with the overriding need to mitigate the ecological impacts. In summary, the application site does not appear large enough to accommodate its recreational needs and the ecological mitigation required for the scale and extent of development proposed.

### Protected Species

Surveys for protected species did not originally consider the bungalow demolition but has been addressed satisfactorily now.

There are already existing badger setts and potential for more, within the site. Ideally these would be protected through the provision of green spaces in the same areas, to provide a connectivity of habitat. However, an exclusion zone could be provided, or even a sensitive closure of the setts under licence.

Bats are also present around the site, which will be negatively impacted by the layout being so close to the existing hedges, especially the tall eastern boundary hedge. The scheme would benefit from more buffer space being provided along the hedge, and needs to include appropriate considerate mitigation, including sensitive lighting, creating new roosting opportunities, and providing new planting.

Other trees have been identified to have bat roosting potential and should be investigated and the impacts mitigated.

The Landscape and Ecology Officer agrees that there does not appear to be potential for great crested newts to be present, due to the lack of available ponds / aquatic habitat.

Birds nesting precautions, hedgehog and harvest mouse investigations and protection need to be accommodated into the construction process.

Reptiles have been shown to be present as a good population size of lizard and slow worm. Pre-submission of this application a programme of capture and relocation to a suitable and prepared area of Holt Country Park was initiated. The area used to receive this population should continue to be funded for the continued maintenance and health of these reptiles.

Since the 2015 programme of relocation was started, the reptile fencing has been damaged and is ineffective. The reptiles which remained on site and from adjoining sites have likely re-colonised the application site again, and so the fencing will need to be repaired and restored and more surveys and relocations undertaken before development can commence. It is not possible to assess the full impacts on the reptile populations until the survey has been undertaken and need for any relocation site understood, which needs to include a condition survey of the proposed receptor site (both capacity and quality).

Subject to mitigation for badgers, bats, and the reptile recovery scheme being re-instigated (all to be secured by conditions), the scheme as revised can be considered acceptable for protected species.