Sent: 06 March 2025 12:35

Subject: RE: 2024/93221 - Parkwood Mill, Stoney Lane, Longwood, HD3 4ZQ - 5 Dwellings

Please see below some thoughts from an ecological perspective.

Designated Sites

No issue. All designated sites not within 500m of application site.

Onsite species and habitats

The Preliminary Ecological Appraisal does not have photographs within the report for review and so the report cannot be accepted at this moment in time.

- A biological records search has not taken place to check any species of note on the site or the surrounding areas.
- A mention of limitations to the assessment has not been mentioned, nor whether on the day of the assessment (access, etc.). The constraints mentioned is not appropriate as it implies all species and habitats would be detectable, which is not the case.
- There are a number of waterbodies within 500m of the site that don't appear to have been assessed under the GCN HSI index.
- It is not implied that the ecologist is suitability qualified under BS8683.

<u>Bats</u>

There is a building (substation) on the site. It is noted in the Preliminary Ecological Appraisal that the building has bat roosting potential. A preliminary roost assessment must be conducted on this building prior to the application being granted to ensure any potential roosting bats impacted are addressed. Some trees on the site also appear mature, further bat roost investigation is required to assess if bats are roosting within the trees. The trees would also be an appropriate foraging habitat for bats.

Biodiversity Net Gain

The red line boundary indicates area of 1,700m2. De minimis rules only applied to a 25m2 area.
The application states that the proposals are exempt from the general Biodiversity Net Gain condition, as outlined in Paragraph 13 of Schedule 7A of the Town and Country Planning Act 1990 (as amended), due to the de minimis exemption. However, the proposals do not meet the criteria for the de minimis exemption.
With this information so far, a Biodiversity Net Gain Assessment is required.

Protected Trees

Further consultation of protected trees should be clarified with the arboriculture officer.
However, from an ecological perspective:

- A Hedgerow and Tree Protection Plan detailing measures for the protection of trees and hedgerows during the works will be submitted to and approved by the LPA prior to the commencement of works on site, including site clearance and delivery of materials.
- Hedgerow and tree protection measures will include temporary fencing for the protection of hedgerows in accordance with BS 5837:2012 Trees in relation to design, demolition, and construction – Recommendations. Any alternative fencing type or position not in accordance with BS 5837:2012 will be agreed in writing by the LPA prior to the start of development.

- The root protection fencing will define the works exclusion zone around hedgerows and trees. Activities liable to be harmful to hedgerows and trees are prohibited within this exclusion zone, unless agreed in writing with the LPA. The approved hedgerow and tree protection measures will remain in place until the completion of development or unless otherwise agreed in writing with the LPA.

Suggested Conditions.

To be confirmed once PEA and BNG matters addressed.

I hope this is helpful to you. Please do let me know if you have any further questions or comments.

Many thanks,

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