planningissues
TOWN PLANNING AND ARCHITECTURE

STATEMENT OF COMMON GROUND

Land to rear of 156-172 South Street, Bridport, DT6 3NP

CHURCHILL LIVING
CHURCHILL HOUSE
PARKSIDE
RINGWOOD
BH24 3SG

OCTOBER 2025

TOWN & COUNTRY PLANNING ACT 1990

APPEAL BY CHURCHILL LIVING LTD AGAINST DORSET COUNCIL'S REFUSAL OF AN APPLICATION FOR REDEVELOPMENT FOR ERECTION OF RETIREMENT LIVING ACCOMMODATION COMPRISING 48 APARTMENTS, 25 COTTAGES, COMMUNAL FACILITIES, ACCESS, CAR PARKING AND LANDSCAPING TO CREATE AN INTEGRATED RETIREMENT COMMUNITY.

SITE AT: LAND TO REAR OF 156-172 SOUTH STREET, BRIDPORT, DT6 3NP

LPA REF: P/FUL/2024/04613

PLANNING INSPECTORATE REF: APP/TBC
PLANNING INQUIRY DATE: TBC

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1.0 INTRODUCTION

1.1 This Statement of Common Ground and separate topic papers have been prepared jointly by the Appellant and the Council. The purpose of this Statement is to set out as much of the agreed factual information about the proposal as is possible

2.0 APPEAL PROPOSAL

Appeal Site Description

2.1 The site is located in Bridport to the south of the town centre. The site is an irregular plot of land of circa 1.05 hectares. The site is in use as a building supplier merchant and considered to be in a sui generis use. The site contains existing buildings which currently provide storage for building materials and accommodation for ancillary office and staff facilities. The site provides open storage for aggregates and various stone and building materials.

2.2 The site is bounded by South Street to the east of the site, with Dr Roberts Close and a number of residential properties to the north. The River Brit is present along the western and southern site boundaries, with a tributary, the River Asker, immediately to the southeast. Beyond the River Asker, a brewery is situated approximately 25m south of the site. The site contains a flood wall on the southern and western boundary.

2.3 The site is well located within an easy walking distance of shopping and other social facilities, with Bridport town centre being approximately 600m away, where there are local bus and coach connections to nearby towns and villages, and to the nearby city of Dorchester, whose centre is around 15 miles to the east.

Description of Development

2.4 The scheme the subject of this appeal is for the redevelopment of the site to form 48 no. Retirement Living apartments and 25 retirement living cottages with associated communal facilities, vehicular access, car parking and landscaping.

Application subject of this Appeal

2.5 The planning application subject of this appeal was submitted on the 9th August 2024 and was validated by the authority on the 27th September 2024.

2.6 The application was refused under delegated powers on the 21st March 2025 for the following 4 reasons:

1. By reason of the layout and design, and in particular the lack of 2m footways and conveniently located ramped entrances, and having regard to the Public Sector

Equalities Duty as set out in the Equalities Act 2010, the proposed scheme fails to provide an inclusive, safe and accessible pedestrian environment for all, fails to minimise disadvantage and conflict within the highway through good design, and fails to prioritise the pedestrian, contrary to the aims of paragraphs 115-117 and 135 of the National Planning Policy Framework (NPPF), the Department of Transport's Inclusive Mobility guidance, the provisions set out within the National Design Guide, BS8300: Design of an accessible and inclusive built environment (Buildings - Code of Practice), policy AM1 and D12 of the Bridport Neighbourhood Plan, and Policy ENV12 of the West Dorset Weymouth and Portland Local Plan (2015). Furthermore, in the absence of details relating to the positioning of gates across the highway, which could impede Page 2 of 6 traffic, junction radii and swept path analysis to demonstrate safe vehicular access and egress, and details relating to the highway improvements to South Street, it has not been demonstrated that safe and suitable vehicular access to the site could be achieved without detrimental effect on highway safety. Further, owing to the narrow highway widths and ability for vehicles to access and egress the site via the secondary access opposite Jewsons, the safety of road users would be compromised owing to its positioning, width and poor sight lines. The implications to highway safety fall contrary to the provisions set out at paragraphs 115-117 and 135 of the NPPF (2024), Policy AM2 of the Bridport Neighbourhood Plan, and policy COM7 of the West Dorset Weymouth and Portland Local Plan (2015).

2. In the absence of a full Ecological Impact Assessment evidencing the application of the biodiversity mitigation hierarchy (which seeks avoidance, mitigation, and then compensation as a last resort), and which fully assesses the significance of impacts on protected species, and in particular reptiles; which explores the possibility of securing a north-south connection across the site for reptiles; and which fully explores mitigation measures ahead of translocation, but as a last resort identifies a suitable receptor site to enable translocation of reptiles; it has not been demonstrated that protected species would be appropriately safeguarded from significant harm. Translocation of reptiles should be the last resort, as specified by Natural England's Standing Advice for reptiles, and it has not been demonstrated through the application of the biodiversity mitigation hierarchy that harm cannot first be avoided and, if not, mitigated in line with the biodiversity mitigation hierarchy, ahead of translocation and consideration of compensation being considered. As such, the proposed development fails to comply with the provisions set out in paragraph 193(a) of the NPPF (2024) and criteria (iv) of Policy ENV2 of the West Dorset, Weymouth and Portland Local Plan (2015) and criteria 2 of Policy L2 of the Bridport Neighbourhood Plan.

3. The submitted viability assessment does not adequately demonstrate that the scheme would be unviable with the inclusion of affordable housing provision; and insufficient justification has been provided to demonstrate good reason for bringing forward the proposed development devoid of any affordable housing provision, such that the associated benefits of the scheme do not outweigh the need for affordable housing. Further, the proposed scheme fails to provide a balanced development containing a mix of housing, such that it inadequately addresses the range of identified local need. Consequently, the proposed development fails to accord with the provisions set out within paragraph 66 of the National Planning Policy Framework (2024), Policy HOUS1 and HOUS3 of the West Dorset, Weymouth and Portland Local Plan (2015), and policy H1, H4 and H6 of the Neighbourhood Plan (2019).

4. The application site is located in an area at risk now and in the future from fluvial flooding, being located within flood zone 2 and 3, triggering the policy requirement to apply the sequential test. Having regard to the narrow application of the 'area of search'

and the restricted scope of that search, excluding potential available sites, the sequential test is not considered to have been passed; and it has not consequently been demonstrated that there are no reasonably alternative sites at lower risk of flooding that could accommodate the proposed scheme, in line with the requirements of Policy ENV5 of the West Dorset Weymouth and Portland Local Plan (2015) and section 14 (and in particular paragraphs 173-176) of the National Planning Policy Framework (NPPF). Furthermore, had the sequential test been passed, and the exception test applied, the proposed scheme fails to demonstrate, through the submission of an Emergency Plan, Page 3 of 6 that safe access and egress can be achieved during a flood event, having regard to all sources of flooding, and the known risk of surface water flooding within South Street during the 1 in 100 year and 1 in 1000 year event, plus the 1 in 100 year event applying a 20% and 40% climate change allowance. Furthermore, it has not been demonstrated that ongoing maintenance of the flood wall can be effectively achieved such that the Flood Management Plan for Bridport would not be compromised. The application subsequently fails to meet the requirements of Local Plan policy ENV5 and paragraph 181 of the NPPF. Further, having regard to the potential flood risk implications, together with impacts on housing need, highways and impacts on ecology, it is not considered that the wider sustainability benefits of the proposal would in this instance outweigh flood risk. Consequently, the exception test (though not applicable due to the sequential test having been first failed), cannot be considered to have been passed, and the development would fall contrary to the provisions set out in Local Plan policy ENV5 and Section 14 (and in particular paragraphs 177-179) of the NPPF (2024).

2.7 In respect to the first reason for refusal the parties have discussed the outstanding layout issues cited in the reason for refusal and the Appellant has provided a revised site layout plan drw no. 10128BP-PA01 Rev E (Appendix A) which increases pavement widths to 2m along with some other minor amendments to demonstrate safe vehicular and pedestrian access. In light of such the Council consider that the first reason for refusal, subject to control by condition, has been suitably addressed and no longer maintains this reason for refusal.

2.8 In regard to the second reason for refusal the Appellant has provided an updated Reptile Survey Report (October 2025) (Appendix B) with details of a secured translocation site (Appendix C). The Council and County Ecologist are content with both the report and the translocation site and subject to control by condition the Council no longer maintains the second reason for refusal.

Relevant Planning History

2.8 It is considered that there is no relevant planning history relating to the appeal site itself.

Determined Drawings

2.9 The Council determined the application against the following plans and documents:

Details	Plan Number	Scale
Site Location Plan	10128BP_PA00	1:1250 @ A3
Site Layout Plan	10128BP_PA01 B	1:200 @ A1

Ground Floor Plan	10128BP_PA02 A	1:100 @ A1
First Floor Plan	10128BP_PA03 A	1:100 @ A1
Second Floor Plan	10128BP_PA04 A	1:100 @ A1
Roof Plan	10128BP_PA05 A	1:100 @ A1
Apartment Elevation Sheet 1	10128BP_PA06 A	1:100 @ A1
Apartment Elevation Sheet 2	10128BP_PA07 A	1:100 @ A1
Apartment Elevation Sheet 3	10128BP_PA08 A	1:100 @ A1
Apartment Elevation Sheet 4	10128BP_PA09 A	1:100 @ A1
Cottage Block 1 & 2	10128BP_PA10 A	1:100 @ A1
Cottage Block 3 & 4	10128BP_PA11 A	1:100 @ A1
Cottage Block 5	10128BP_PA12 A	1:100 @ A1
Cottage Block 6	10128BP_PA13 A	1:100 @ A1
Cottage Block 6	10128BP_PA14 A	1:100 @ A1
Mobility Scooter & Bins	10128BP_PA15	1:50 @ A1
Site Gate	10128BP_PA16	1:100 @ A1
Existing Buildings	10128BP_PA101	1:100 @ A1

- Planning Statement by Planning Issues;
- Affordable Housing and Viability Appraisal by Planning Issues Ltd;
- Design and Access Statement by Planning Issues Ltd
- Archaeological Desk Based Assessment by Ecus Consultants;
- Ecological Appraisal; Biodiversity Net Gain Assessment and Reptile Survey Report by Tetra Tech;
- Flood Risk and Drainage Assessment by Awcock Ward Partnership;
- Landscaping Strategy by James Blake Associates;
- Statement of Community Engagement by DevComm;
- Transport Statement by Awcock Ward Partnership;
- Tree Protection Plan, Arboricultural Method Statement and Manual for Managing Trees on Development Sites by Barrell Tree Care;
- Housing Need Assessment by ThreeDragons

- Energy Statement by FOCUS Consultants
- Sequential Test by Planning Issues Ltd
- Heritage and Archaeological Assessment by Ecus Consultants

Relevant Policy Guidance

2.10 It is agreed that the following are the relevant policy/guidance considerations in respect of this Appeal:

National Planning Policy
The National Planning Policy Framework (NPPF) (2024)

- Section 2 - Achieving Sustainable Development
- Section 4 - Decision-making
- Section 5 - Delivering a sufficient supply of homes
- Section 6 - Building a strong, competitive economy
- Section 8 - Promoting healthy and safe communities
- Section 9 - Promoting Sustainable Transport
- Section 11 - Making Effective use of Land
- Section 12 - Achieving well-designed and beautiful places
- Section 14 – Meeting the challenge of climate change, flooding and coastal change
- Section 15 – Conserving and Enhancing the Natural Environment

National Planning Practice Guidance (NPPG) 2019

It is considered that the following sections are relevant to this appeal;

- Effective Use of Land
- Flooding and Coastal Change
- Housing for Older and Disabled People
- Viability
- Town Centres and Retail
- Biodiversity Net Gain

West Dorset, Weymouth and Portland Local Plan (2015)

INT1 – Presumption in Favour of Sustainable Development

ENV1 – Landscape, Seascape and Sites of Geological Interest

ENV2 – Wildlife and Habitats

ENV4 – Heritage Assets

ENV5 – Flood Risk

ENV9 – Pollution and Contaminated Land

ENV10 – The Landscape and Townscape Setting

ENV11 – The Pattern of Streets and Spaces

ENV12 – The Design and Positioning of Buildings

ENV15 – Efficient and Appropriate Use of Land

ENV16 – Amenity

ECON3 – Protection of other Employment Sites

HOUS1 - Affordable Housing

HOUS3 – Open Market Housing Mix

SUS1 – The Level of Economic and Housing Growth

SUS2 – Distribution of Development

COM7 – Creating a Safe and Efficient Transport Network

COM9 – Parking Standards in New Development

Bridport Neighbourhood Plan (2019)

CC1 – Publicising Carbon Footprint

CC2 – Energy and Carbon Emissions

CC3 – Energy Generation to Offset Predicted Carbon Emissions

AM1 – Promotion of Active Travel Modes

AM2 – Managing Vehicular Traffic

AM5 – Connections to Sustainable Transport

H1 – General Affordable Housing Policy

H2 – Placement of Affordable Housing

H4 – Housing Mix & Balanced Community

H5 – Retirement Living Development

H6 – Housing Development Requirement

HT1 – Non Designated Heritage Assets

HT2 – Public Realm

L1 – Green Corridors, Footpaths, Surrounding Hills & Skylines

L2 – Biodiversity

L5 – Enhancement of the Environment

COB1 – Development in the Centre of Bridport

D1 – Harmonising with the Site

D2 – Programme of Consultation

D3 – Internal Transport Links

D4 – Mix of Uses

D5 – Efficient use of Land

D6 – Definition of Streets and Spaces

D7 – Creation of Secure Areas

D11 – Building for Life

D12 – HAPPI (Housing or Ageing Population: Panel for Innovation) Principles

Material Planning Considerations

2.11 In addition to the above the Council have the following supplementary planning documents;

- Planning Obligations SPD (2010)
- Design & Sustainable Development Planning Guidelines (2009)
- Affordable Housing HOUS 1 – Position Statement

Third Party Representations

2.12 The application subject of this appeal received 129 public consultation responses. 127 of the responses were of objection and 2 letters of support.

Issues to be addressed with the Appeal Scheme

2.13 Following receipt of the decision notice and having regard to further evidence provided and appended to this Statement of Common Ground it is considered that the following are the remaining main issues for the appeal (I summarise):

a) whether the proposal would make appropriate provision for affordable housing;

b) whether the proposal would contribute to the achievement of a balanced community;

c) the effect of the proposal on flood risk; and

d) the nature and extent of any economic, social and environmental benefits

Conditions

2.14 Should the Inspector be minded to allow this Appeal it would be appropriate to consider necessary conditions. A draft list of suggested conditions will be separately in accordance with the post CMC note.

Agreed Issues

3.0 The issues set out below are those that are considered can be agreed between the parties:

Principle of Development

1. The site is within a sustainable location falling within the defined settlement boundary of Bridport.

2. It is agreed that substantial weight should be given to the re-use of this brownfield site for housing as set out by Paragraph 125(c) of the NPPF.

3. It is agreed that the site is not a key employment site and the proposed development complies with Policy ECON3 of the West Dorset, Weymouth and Portland Local Plan.

Housing Land Supply

4. The Council's Housing Land Supply Position Statement (October 2025) identifies that the Council have a 2.53 year housing land supply which represents a shortfall of circa 8,000 dwellings and as such Paragraph 11(d) of the NPPF is engaged.

Older Persons Accommodation

5. National Planning Policy Guidance (June 2019) identifies that the need to provide housing for older people is 'critical', and that 'Plan-making authorities should set out clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require.

6. National Planning Policy Guidance identifies at Paragraph 16 under housing for older and disabled people that 'where there is an identified unmet need for specialist housing, local authorities should take a positive approach to schemes that propose to address this need.

7. It is agreed that there is a need within the District for specialist housing for older persons. It is agreed also that the housing needs assessment which informed the Neighbourhood Plan identified a need for specialist accommodation for older persons together with a need for other accommodation types. Policy H5 requires a new or extended retirement living development will demonstrate a proven need for the development in the neighbourhood plan area or its closely surrounding parishes. The Bridport Area Needs Assessment (AECOM,April 2025) and the Housing Needs Assessment Supplement (Neighbourhood Plan Working Group, August 2025) identify a need for 187-321 new open-market sheltered, or retirement living homes are needed in the Bridport Area.

8. The Bridport Housing Needs Assessment (April 2025) and the Housing Needs Assessment both identify a local need for affordable housing. Figure 7 of the Housing Needs Assessment identifies an affordable housing delivery of 549 in the Bridport Neighbourhood Plan Area by 2036 with a shortfall of 279 dwellings. To address the shortfall the Neighbourhood Plan Working

Group is proposing a policy change to the Neighbourhood Plan that prioritises the delivery of affordable housing over the provision of open market retirement development.

Heritage Assets

8. The site sits outside of Bridport Conservation Area.

9. This is within the setting of a number of listed buildings including 158 South Street, two listed bridges and Bridport Old Brewery and associated buildings.

10. It is agreed that the proposed development would not result in any harm to the significance of the setting of listed buildings in the vicinity of the proposed development site.

Flood Risk

10. The site falls within floodzones 2 and 3a.

Highways

11. It is agreed that the proposed development provides safe access for vehicles and pedestrians and there would be no unacceptable impacts on highway safety.

Other Matters

12. The proposed development would not cause harm to the residential amenities of neighbouring existing residential properties.

13. The proposed development, subject to conditions, would not cause harm to protected species.

Signed...[redacted].....

Mr. Matthew Shellum on behalf of Churchill Living Ltd.

Date....[redacted]

Signed [redacted]

Mr.Robert Lennis on behalf of Dorset Council.

Date …25/11/25……..

Appendix A

Site Layout Plan

10128BP-PA01 Rev E

REVISIONS

Rev.		Date	By
A	General amends to annotation.	04/09/24	MJS
C	Wider pedestrian path	19/08/25	KR
D	Amendments to pedestrian paths	11/09/25	KR
E	Parking provision increased	23/09/25	KR

APARTMENTS	
1 bed	32
2 bed	16
TOTAL	48
COTTAGES	25
TOTAL UNITS	73

Balconies/terraces
Communal Areas
Parking spaces for Apartment Block
V Visitor spaces

NORTH

DOCTOR ROBERTS CLOSE
TERRACE 1
TERRACE 2
TERRACE 3
TERRACE 4
TERRACE 5
TERRACE 6
El Sub Sta
Telescopic Sliding Gates
5.8m
Gates
9 PARKING SPACES FOR COTTAGES
17 PARKING SPACES FOR APARTMENTS
Mobility Scooter Store
ENT
Lift
Store
OWNERS LOUNGE
TURNING AREA
Accessible Hall Accessible
Car Park
Posts
River Brit
Water Level
South Bridge
PL
hard surface suitable for heavy vehicles access and turning
Weir
Sl
Gas Gov
Tank (cov)
FW
5.2m

planning issues
TOWN PLANNING AND ARCHITECTURAL DESIGN
Rob Jackson RIBA
Design Director - South West
Churchill House * Parkside
Ringwood * Hampshire BH24 3SG
Telephone: (01425) 462372
E-mail design@planningissues.co.uk

Client
Churchill Living
Your lifestyle • Your choice

Project Title
Retirement Housing
Hanson and Phillips Depot
Bridport
DT6 3NP

Drawing Title
SITE PLAN
PLANNING APPLICATION

Scale	1:400 @ A1	Date	Jul 2024
Drawn	KR	Checked	RJ
Drawing No.			Rev.
10128BP- PA01			E

Bridport - Hanson and Phillips Depot, - Proposed Retirement Housing - Site Plan

Scale 1:400
0 10 20 50

Appendix B

Reptile Survey Report

October 2025

784-B048171

South Street, Bridport

Reptile Survey Report and Reptile Mitigation Strategy

Planning Issues Ltd

October 2025

Document prepared on behalf of Tetra Tech Limited

TETRA TECH

Tetra Tech Southampton, International House, Solent International Business Park, George Curl Way, Southampton, SO18 2RZ

Tetra Tech Limited. Registered in England number: 01959704
Registered Office: 3 Sovereign Square, Sovereign Street, Leeds, United Kingdom, LS1 4ER

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Version:	V1	**Prepared by:**	Chloe Mockridge Consultant Ecologist [redacted]
Date:	April 2024	**Checked by:**	Trish Holden MCIEEM Principal Ecologist [redacted]
Status:	Final	**Approved By:**	Tamsin Clark MCIEEM Associate Director [redacted]

Version:	V2	**Prepared by:**	Izzy Frey BSc ACIEEM Project Ecologist [redacted]
Date:	October 2025	**Checked by:**	Alex Coggins Principal Ecologist [redacted]
Status:	Version 2 – Revision 1	**Approved By:**	Kevin Wood Associate Ecologist [redacted]
Description of Revision:	Report amended to include details of reptile translocation exercise and off-site receptor site.		

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GLOSSARY

Acronyms/Abbreviations	Definition
CEMP	Construction Ecological Management Plan
CIEEM	Chartered Institute of Ecology & Environmental Management
DEFRA	Department for the Environment, Food and Rural Affairs
ECoW	Ecological Clerk of Works
JNCC	Joint Nature Conservation Committee
LBAP	Local Biodiversity Action Plan
LPA	Local Planning Authority
MCIEEM	Member of the Chartered Institute of Ecology & Environmental Management
NERC Act	Natural Environment and Rural Communities Act 2006
NPPF	National Planning Policy Framework
PEA	Preliminary Ecological Appraisal
SAP	Species Action Plan

EXECUTIVE SUMMARY

Contents	Summary
Site Location	The site is located west of South Street in Bridport, Dorset and is centred at Ordnance Survey (OS) National Grid Reference SY 46509 92260.
Proposals	The development proposals comprise a residential care home with associated parking, infrastructure and landscaping.
Scope of this Survey(s)	The purpose of this assessment is to: • Determine the presence or likely absence of reptiles within the site area. • Identify if any additional surveys are required to inform this assessment. • Determine if any potential impacts on reptiles are likely to arise from the development. • Provide advice and outline strategies to avoid/mitigate/compensate for any likely impacts on reptiles.
Results and Evaluation	There is suitable habitat for reptiles present on site in the form of mixed scrub and grassland areas along the northern, north-western and southern edges of the site. The presence/ likely absence surveys recorded a breeding population of slow-worms on site. This is likely to equate to a 'good' population as defined by Froglife (1999). Slow-worms are protected from killing or injury under the Wildlife and Countryside Act (1981) (as amended). Given the size of the site and its urban setting, the proposed development cannot provide an adequate area for reptiles to disperse or be moved to, and as such, reptiles will require translocation to an off-site receptor site.
Recommendations	**On-Site:** • Temporary reptile exclusion fencing is to be installed along the northern boundary of the site; • 30-day reptile translocation, if agreed with the LPA, to take place between March and October (active reptile season), including placement of artificial refugia, habitat manipulation and then a minimum of 30 days to trap and translocate reptiles. Once 5 clear days have passed with no reptiles found, no further visits will be required; • After 5 'clear days', this will be followed by: ▪ Displacement strategy (directional vegetation clearance). ▪ Destructive search (top-soil clearance) under supervision of Ecological Clerk of Works (ECoW).

	• Created and small areas of retained habitat to be enhanced through creation of wildflower meadow, relaxed mowing scheme and log piles for wildlife; and • Gaps created in fences to maintain connectivity to the immediate surrounding area, allowing wildlife to move through the site. **Receptor Site:** • A local site has been identified which has been confirmed as suitable to be used as a receptor site for the slow-worms; • Surveys of the receptor site are not required as the site offers opportunities for dispersal in all directions, and is therefore unlikely to negatively impact any existing populations of reptiles, if present; • The management regime of the receptor site is to continue as it has been historically, comprising occasional sheep grazing to reduce scrub encroachment; and • Log piles to be installed in receptor area prior to translocation. **Post-Development:** • One year of post-development monitoring of receptor site to inform any remedial actions or management prescriptions to seek to ensure continued survival of the population and viability of the receptor site.
Conclusions	The development proposals and urban setting of the site offer no suitable alternative other than the translocation of the 'good' population of slow-worms to an off-site receptor area. A suitable site has been identified locally and secured by legal agreement. Translocation and post-translocation monitoring will aim to avoid the illegal killing and injury of slow-worms during the works, and will seek to ensure the favourable conservation status of the species is maintained. Mitigation including a 30-day reptile translocation will be required to allow the works to proceed and in accordance with legal requirements for the protection of slow-worms. The current proposals will provide enhancements for biodiversity, and will include relaxed management of grassland and provision of log piles within retained habitat on-site to benefit reptiles and allow wildlife to colonise and move through the site, post-development.

1.0 INTRODUCTION

1.1 BACKGROUND

Tetra Tech was commissioned by Planning Issues Ltd on 14th March 2024 to undertake a reptile survey and provide a reptile mitigation strategy of land at South Street, Bridport, hereafter referred to as "the site". This report has been prepared by Consultant Ecologist Chloe Mockridge BSc (Hons), MSc and Assistant Ecologist Ryan Pearson BSc (Hons) and revised by Project Ecologist Izzy Frey BSc (Hons) AICEEM. The conditions pertinent to it are provided in Appendix A.

Reptiles are protected species, full details of that protection, including types of offences and policy position are provided in Appendix B.

1.2 SITE LOCATION

The site is located west of South Street in Bridport, Dorset and is centered at Ordnance Survey (OS) National Grid Reference SY 46509 92260 – See Figure 1. The site is situated in an urban setting towards the south of Bridport and is immediately bounded by the River Brit to the west and south, which forms a confluence with the River Asker, with a man-made weir directly to the south of the site. There is a residential area immediately to the north and industrial development to the east. Further urban development associated with Bridport and Bothenhampton lie to the north and east respectively. The wider landscape is more rural, with open space comprising arable land, small parcels of woodland and a network of hedgerows.

The site is currently an active buildering supply yard largely comprised of bare ground, with areas of grassland, scrub, lines of trees and ephemeral and ruderal vegetation.

1.3 DEVELOPMENT PROPOSALS

The development proposals comprise a total of 48 retirement apartments and 25 cottages with associated parking, infrastructure and landscaping.

1.4 PURPOSE OF THE REPORT

The purpose of this assessment is to:

- Determine the presence or likely absence of reptiles within the site area.
- Identify if any additional surveys are required to inform this assessment.
- Determine if any potential impacts on reptiles are likely to arise from the development.
- Provide preliminary advice and outline strategies to avoid/mitigate/compensate for any likely impacts on reptiles.

The details of this report will remain valid for a period of eighteen months from the date of the final reptile survey in May 2024 (November 2025), after which the validity of this assessment should be reviewed to determine whether further updates are necessary.

The recommendations within this report should be reviewed (and reassessed if necessary) should there be any changes to the red line boundary or development proposals upon which this report is based.

Note that scientific names are provided at the first mention of each species and common names (where appropriate) are then used throughout the rest of the report for ease of reading.

2.0 METHODOLOGY

2.1 HISTORIC SURVEYS

Tetra Tech completed a Preliminary Ecological Appraisal (PEA) of the site in June 2023 (Tetra Tech, 2023) and condition assessments to inform the Biodiversity Net Gain (BNG) Assessment in April 2024 (Tetra Tech, 2024). The reports associated with these surveys have been reviewed and are discussed in Section 3.1 below.

Other than the surveys undertaken by Tetra Tech, Tetra Tech is not aware of any previous survey work carried out at the site nor reports pertaining to ecological conditions at the site.

2.2 DESK STUDY

The desktop study comprised two elements:

- A data search obtained from Dorset Environmental Records Centre (DERC) in April 2023 of records of reptiles within 2km of the site boundary.
- Online element including a 2km search using: Multi Agency Geographic Information for the Countryside (MAGIC) (https://magic.defra.gov.uk) website and Ordnance Survey (OS) and Aerial Imagery (https://www.bing.com/maps). This included a search for any designated sites within 2km supporting reptiles. The search was conducted in March 2024.

2.3 FIELD SURVEYS

2.3.1 Biosecurity

All surveys were conducted in accordance with Tetra Tech Biosecurity Policy (June 2023).

2.3.2 Presence / Likely Absence Surveys

All surveys were conducted by experienced surveyors, Principal Ecologist Alex Coggins, Project Ecologist Izzy Frey and Assistant Ecologist Ryan Pearson.

Surveys were undertaken in accordance with the Herpetofauna Workers' Manual (Gent & Gibson, 2003) and Advice Sheet 10 – Reptile Survey (Froglife, 1999) and comprised the use of two complementary methods – direct observation and artificial refuge checks. These two methods were applied over seven visits from 8th April 2024 to 8th May 2024 in suitable weather conditions.

Direct observation required surveyors to walk slowly towards suitable basking spots and artificial refuges, scanning 3-4 m ahead of footfall to observe any reptiles which may be basking out in the open or upon natural/artificial refuges. Natural refuges on site include features like sun traps, edge habitats, piles of logs, brash and bricks.

Artificial refuges are sections of bitumen roofing felts approximately 1x2m, which are clearly numbered and placed across the site in areas considered to have habitat suitable to support reptile activity (see Figure 2 for artificial refuge placement plan). As a general rule, the density of artificial refuges used should be 10 per ha. However, given the small area of the site, additional refugia were used in this instance.

On 26th March 2024, 50 refuges were set out in suitable areas, these were then left undisturbed on the site for 13 days prior to the commencement of surveys. This allowed the refuges to settle within the environment and reptiles, if present, to find and utilise them.

The refugia were checked on seven occasions, in accordance with Froglife (2016). On each visit, each refuge was first checked for basking individuals from a distance before being hand searched for sheltering reptiles. The location and species of each reptile sighting was recorded to allow for analysis of distribution across the site. Where possible to do so, life stage (i.e. adult/juvenile) and sex of individuals was recorded. .

Reptiles are active from March to October however it is considered that the most successful months to survey are April, May and September (Froglife, 1999 and 2016); although it is recognised that the exact optimal timing to survey is dependent on environmental variables such as temperature, rainfall and wind. Heavy rain, strong wind and high temperatures are considered unsuitable conditions to survey for reptiles. Froglife (1999) states that the best time of day to survey for reptiles is between 08:30 to 11:00 and between 16:00 and 18:30 when air temperature is between 9°C and 18°C. Weather conditions were recorded for each survey are presented in Table 1.

Table 1. Survey Dates and Weather Conditions – Presence / Likely Absence Survey

Survey No.	Date	Time		Air Temperature (°C)		Wind Speed	Cloud Cover Start (%)	Cloud Cover	Precipitation (%)
		Start	End	Initial	Final				
1	08.04.24	10:00	10:55	12.0	13.0	Light air	80		0
2	11.04.24	10:25	11:15	14.0	15.0	Light air	80		0
3	15.04.24	11:30	12:15	11.0	11.0	Gentle breeze	60		Very light rain shortly before start
4	18.04.24	14:00	14:50	12.0	12.0	Light Breeze	20		0
5	23.04.24	10:25	11:15	11.0	11.0	Light Breeze	80		0
6	01.05.24	09:50	10:20	10.0	10.0	Light air	100		Very light rain shortly before start
7	08.05.24	10:20	10:55	17.0	16.0	Light Breeze	40		0

2.4 LIMITATIONS

Due to unsuitable weather conditions during optimal timings, surveys three and four on 15th April 2024 and 18th April 2024 were both conducted outside of the optimal timings, although temperatures were suitable. As reptiles were recorded during these surveys, this is not considered to have affected the overall findings.

Prior to the commencement of surveys 3 and 6, there were short spells of light rain. The surveyor waited until the rain had stopped and the refuges had warmed up slightly, hence the survey started slightly later in the morning. It is noted that humid periods directly after light rain can also provide good conditions for

basking reptiles. Surveys were undertaken in the most suitable weather possible while spacing surveys out where possible. Reptiles were present during these surveys (despite being in suboptimal weather) and therefore this is not considered to have affected the overall finding during the surveys.

Some of the refugia were misplaced or buried due to the active work yard moving large amounts of debris, this meant that a few refugia could not be surveyed. As refugia were distributed across the site's suitable habitats exceeding the required 10 per hectare, it is considered that the site was sufficiently covered thus this does not pose an overall limitation to the survey findings.

Notwithstanding the limitations highlighted above, the survey effort applied is considered sufficient to meet the aims of the survey and this report, in accordance with the aforementioned guidelines.

The details of this report will remain valid for a period of 18 months from the date of the survey (November 2025), after which the validity of this assessment should be reviewed to determine whether further updates are necessary. Note that the recommendations within this report should be reviewed (and reassessed if necessary) should there be any changes to the red line boundary or development proposals which this report was based on.

3.0 RESULTS

3.1 HISTORIC SURVEYS

A PEA of the site was carried out in June 2023 (Tetra Tech, 2023). This found the site to be suitable for reptiles due to the grassland and scrub on site, as well as log piles and building materials piled up on site creating natural hibernacula. There is also anecdotal evidence from staff who work on the site of slow worms being present in the north-west of the site and an adder had been seen previously.

3.2 DESK STUDY

The data search identified no known statutory designated sites which are designated in part for reptiles or non-statutory sites which are known to support reptiles within 2km of the site.

DERC returned 17 records for reptiles between 2014 and 2017 comprising 12 records of slow-worm *Anguis fragilis,* three for grass snake *Natrix helvetica*, one for common lizard *Zootoca vivipara* and one for adder *Vipera berus.* The closest records to the site were of grass snake at the Watton Park development, 430m to the southwest. These records are isolated from the site by roads, residential development and the River Brit and River Asker. Although rivers are less of a barrier for dispersal for snakes, slow-worm and common lizard are unlikely to be able to disperse into the site from the wider landscape. The flood defence wall surrounding the site is considered to be a significant barrier to dispersal for slow worms, both into and out of the site, which is supported by Figure 4.

3.3 FIELD STUDY

Slow-worms were recorded on site, predominantly in the northern and southern areas of the site. See Table 2 for a summary of the survey results. When apparent, the sex of the individual was also recorded and noted within Table 2. Figure 3 shows the locations of reptile observations and the full results are given in Appendix C. No other reptiles were recorded.

Table 2. Survey Results of the Site

Survey No.	Date	Records			
		Species	No. Adults	No. Sub-Adults	No. Juveniles
1	08.04.24	Slow-worm	5♂, 10♀, 4 unknown sex	5	3
2	11.04.24	Slow-worm	11♀, 4♂	4	2
3	15.04.24	Slow-worm	6♀	-	5
4	18.04.24	Slow-worm	15♀, 4♂	5	-
5	23.04.24	Slow-worm	11♀, 5♂	6	-
6	01.05.24	Slow-worm	9♀, 2♂	2	4

Survey No.	Date	Records			
		Species	No. Adults	No. Sub-Adults	No. Juveniles
7	08.05.24	Slow-worm	18♀, 6♂	3	4
Key	♂ male, ♀ female				

As both male and female slow-worms were found along with sub-adults and juveniles, it can be assumed that the site or the immediate off-site areas hosts a breeding population.

Based on the peak counts recorded, indicative population estimates (Froglife 1999 would usually require 20 visits to fully inform a population estimate) have been made in accordance with criteria as set out in Table 3 and are shown in Table 4.

Froglife's *Advice Sheet 9* recommends using 10 refugia per hectare. 50 refugia were used on site due to the amount of suitable habitat. According to their guidance, 11.2 refugia should have been distributed on this 1.12-hectare site. This gives a multiplying factor of 4.46. The peak count of 24 adult slow worms thus can then be divided by this multiplying factor to obtain a more accurate population size for the site.

Table 3. Assessing Population Size using Peak Counts (Froglife, 1999)*

Species	Low population	Good population	Exceptional population
Adder	<5	5-10	>10
Grass snake	<5	5-10	>10
Common lizard	<5	5-20	>20
Slow-worm	<5	5-20	>20

* Figures in the above table refer to the maximum number of **adults** seen by observation and/or under refugia by one person in one day.

Table 4. Reptile Populations (Based on Adjusted Results to Compensate for Increased Number of Refugia)

Species	Peak Count	Population Estimate
Slow-worm	5.38	Good population

* Figures in the above table refer to the maximum number of adults seen by observation and/or under mats by one person in one day.

Based on the assessment in Table 4, it is considered that at present the site is likely to support a **good population of slow-worms.**

3.4 RESULTS SUMMARY

The site was found to support a good (breeding) population of slow-worm comprising male and female adults and juveniles. Suitable reptile habitat on site is restricted to grassland and scrub in the north and

west of the site, with a small area of scrub in the south of the site surrounded by large expanses of bare ground. The site is largely isolated from the surrounding area by South Street to the east, residential development to the north, and the concrete flood defence wall and river to the east, south and west. There may be some connectivity off-site via neighbouring residential gardens to the north, though this is considered extremely limited as there is only a very small strip of scrubby vegetation along Dr Roberts Close to the north.

4.0 DISCUSSION

4.1 IMPACTS

Following the desk study and field survey, a good population of breeding slow-worms has been identified on site.

Without mitigation there are likely to be adverse effects on reptiles through loss of habitat, severance of connectivity, killing and injury and disturbance during the construction and operational phase of the proposed development. This would constitute a breach of the Wildlife and Countryside Act (1981) (as amended) and would be non-compliant with local and national planning policy.

Potential impacts to reptiles as a result of the development, in the absence of mitigation are described below.

4.1.1 Loss of Habitats

The majority of scrub and grassland habitats across the site will be lost permanently, with only some small areas retained in the north and south of the site. These habitats currently support a good population of slow worm including breeding individuals and juveniles, across the site.

The log piles and other man-made debris within the north-west of the site of the site will also be removed to facilitate redevelopment of the site, creating a loss in natural refuges and hibernacula for reptiles.

4.1.2 Loss of Connectivity

Most of the suitable habitat is on the north-west side of the site. A large, concrete flood defence wall adjacent to the River Brit bounds the site along the southern and western boundaries, which restricts the dispersal of reptiles in these directions, meaning reptiles are unable to disperse onto the adjacent riverbank – See Figure 4. The grassland and scrub habitat on the northern boundary has limited connectivity to a very small area of scrubby habitat on the southern side of Dr Roberts Close through the dilapidated fence along the northern boundary of the site. However, opportunities for reptile dispersal to and from the site are currently limited due to this, in addition to the site being otherwise bounded by residential development and the banks of the River Brit and River Asker, which is limited by the large concrete flood defence wall.

Despite small areas of grassland being proposed to be retained and / or reinstated post-development, due to the restricted size of the site, these habitats will be lost or degraded during construction. Any reptiles left within these areas during the construction and or operational phases would likely become isolated from the main population, negatively impacting their survivability. In summary, there is little to no connectivity to off-site suitable habitat from the site, and therefore a full reptile translocation is recommended to a suitable off-site receptor area.

4.1.3 Killing & Injury

Removal of suitable reptile habitat which supports slow-worms will be required to facilitate the proposed development. These works have the potential to kill and injure slow worms, if unmitigated, which is an offence under the Wildlife and Countryside Act (1981) (as amended).

During the operational phase there is potential for an increase in the number of cats and other domesticated pets living in the area due to the increase in residential units (The Mammal Society, 1997). Studies have shown that domestic cats do predate on reptiles, affecting the level of biodiversity in the area (Trouwborst et al., 2020; Trouwborst & Homsen, 2020). Given the limited availability of suitable reptile habitat on the site post-development, this would exhibit an even greater pressure on the existing reptile population which already has limited opportunities for dispersal out of the site.

4.1.4 Construction-phase Disturbance

All works in suitable reptile habitat will cause disturbance to any reptiles within these areas of the site. Due to the small size of the site, there is not adequate retained habitat within the site for reptiles to move into during the works. Slow-worms are legless lizards and thus have limited dispersal abilities (even during the active season) due to their slow movement, especially if individuals are not warm. One area of scrub exists in the south of the site where slow-worms were found and increased movement of machinery and construction activities around the site have the potential to isolate this area of habitat even further. Disturbance can prove fatal, and individuals are at even greater risk should works be carried out during their hibernation period (generally accepted as October to March inclusive). During hibernation, reptiles are at increased risk as unseasonal moving utilises bodily resources and they are less able to move away from harm. Unmitigated, works to suitable habitat will therefore likely cause harmful disturbance to reptiles, and potentially kill or injure them which would constitute an offence under the Wildlife and Countryside Act (1981) (as amended).

4.1.5 Operational-phase Disturbance

Increased recreational use around the edges of the site would likely cause disturbance to reptiles, if they were to remain within the site. The limited amount of grassland habitat proposed is unlikely to be managed in a suitable condition for reptiles and the reduced area may struggle to have carrying capacity for the size of the current reptile population. The population is also isolated from any surrounding suitable habitat and therefore habitat availability would become very limited for new individuals over time. These impacts would not constitute an offence under the relevant wildlife legislation but would be undesirable as it could affect the ongoing viability of the on-site reptile population.

4.2 MITIGATION

As adverse effects on reptiles are anticipated, mitigation will be required to avoid an offence under the relevant wildlife legislation.

The Wildlife and Countryside Act (1981) (as amended) states that it is illegal to cause injury or death to widespread reptile species such as those found on site. In addition to this, consideration must be given to Section 41 of the Natural Environment and Rural Communities Act 2006 (see Appendix B), which lists habitats and species of Principal Importance for the conservation of biodiversity in England, including slow-worm and grass snake.

The Bridport Area Neighbourhood Plan (2020-2036) (Appendix B) should also be reviewed in order to meet Policies L1 and L2 to ensure that the proposed development will not adversely affect the wider landscape setting, will demonstrate how they will provide a net gain in biodiversity and, where feasible, habitats and species, on the site.

The following principles and hierarchy (CIEEM, 2024) are used when determining requirements for mitigation and management measures:

- **Avoidance** – Seek options that avoid harm to ecological features (for example, by locating on an alternative site);
- **Mitigation** - Negative effects should be avoided or minimised through mitigation measures, either through the design of the project or subsequent measures that can be guaranteed – for example, through a condition or planning obligation;
- **Compensation** - Where there are significant residual negative ecological effects despite the mitigation proposed, these should be offset by appropriate compensatory measures; and
- **Enhancement** - Seek to provide net benefits for biodiversity over and above requirements for avoidance, mitigation or compensation.

With regard to the mitigation hierarchy, it is not considered possible to avoid harm to the population of slow-worms, if they were to remain in-situ whilst the site is redeveloped, due to the limited amount of habitat on site and the isolated nature of the site, with the flood defence wall to the south and west, Dr Roberts Close with its lack of green space to the north, and South Street to the east acting as significant barriers for dispersal.

Appropriate mitigation will therefore comprise translocating slow-worms from the site to a more suitable receptor site, prior to development. This should benefit the breeding population by providing increased space and better dispersal opportunities into the wider landscape than where they are located currently. Given the relatively small areas of suitable habitat on site and population size, the fact that the population is breeding and is already isolated from the surrounding landscape, it is possible that without translocation this population would be at risk of inbreeding and become unviable in the future.

There is a possibility that un-relocated slow-worms in adjacent rear gardens (if present) will experience loss of habitat from the site, however this will be compensated for as described below.

4.2.1 Loss of Habitats

Loss of suitable reptile habitat within the site which supports a good population of slow-worm is considered largely unavoidable, given the small size of the development area, limited off-site connectivity and isolation of the existing habitat across the site. For this reason, it is considered highly unlikely that the site itself can provide a suitable receptor site pre-development, nor suitable habitat to support a breeding population post-development. A translocation exercise is therefore proposed to relocate slow-worms to an off-site receptor area.

A local receptor site has been secured via a legal agreement which comprises a grassland field which is largely unmanaged, aside from occasional sheep grazing. The receptor site is ‘land on the west side of Slape Hill, Netherbury, Bridport’ and is hereafter referred to as the ‘Receptor Site’ – See Figure 5. The receptor site is approximately 6km (a 15-minute drive) from the proposed development site. Typically, surveys of a receptor site may be carried out to assess whether reptiles are currently present and to ensure adding new individuals would not negatively impact the existing population. These surveys are not considered necessary in this case, as the receptor site has full access to the surrounding landscape, into which translocated individuals can disperse into wider suitable habitat.

4.2.2 Loss of Connectivity

Existing suitable reptile habitat within the proposed development has very limited connectivity to the wider landscape. The grassland in the western edge of the site and scrub to the north has some potential connectivity to the scrubby road verge of Dr Robert Close to the north under fences, however the adjacent road, riverbank and concrete flood defence wall are considered significant barriers to dispersal for slow worm on or off the site. This is considered unlikely to improve following residential development of the site, given the increase in units and hardstanding. It is recommended that gaps are created in the bottom of fences at all intersections to allow connectivity for wildlife to move through the site in the event that there is a population in the limited habitat to the north of the site.

The receptor site comprises a rough grassland field located in a rural area between the villages of Netherbury and Weytown (see Figure 5), providing direct connectivity to large expanses of suitable reptile habitat within the wider landscape. This will ensure translocated individuals can move freely to and from the site and will provide an opportunity for individuals to mix with other populations of slow worms (if present), ensuring genetic viability as the likelihood of inbreeding will be reduced. The availability of space within the receptor site and unrestricted access to adjacent habitat will also allow juveniles to disperse and ensure the carrying capacity of the receptor site is highly unlikely to be exceeded.

4.2.3 Killing & Injury

With works anticipated to clear the majority of suitable reptile habitat to facilitate the development, there is the potential to kill and injure reptiles on site.

Prior to the commencement of any vegetation removal within the site, reptile exclusion fencing is to be installed along the northern boundary, followed by a translocation exercise, and then any areas of suitable habitat proposed for removal will be cleared following a systematic approach.

All works are to be conducted only under the strict supervision of a suitably qualified ecologist or Ecological Clerk of Works (ECoW) and are to be detailed within a Construction Environmental Management Plan (CEMP)

A brief summary of the mitigation required to prevent killing and injury of reptiles (with further details in sections below) is as follows:

- Installation of temporary reptile exclusion fencing around retained vegetation, which must remain secure and in place until the translocation and destructive search are complete;
- Translocation of the reptiles, involving a 30-day exercise (or until 5 clear days are reached with no animals found);
- Directional vegetation clearance and habitat manipulation to encourage reptiles into ‘habitat islands’ and to go under refugia; and
- Destructive search (top-soil clearance).

Reptile Exclusion Fencing

To protect reptiles from entering the active work site, resulting in killing or injury, temporary reptile exclusion fencing will be installed along the northern boundary of the site where there may be some connectivity to the scrubby road verge of Dr Roberts Close. No fencing should be installed along the southern and western boundaries, adjacent to the large, concrete flood defence wall, as this wall is

considered sufficient as a barrier to dispersal for reptiles. The installation of fencing adjacent to the defence wall may also impact the structure of the wall and is therefore not recommended. There is no connectivity to suitable habitat along the eastern boundary of the site, and therefore no need for reptile exclusion fencing in this location either. A reptile fencing plan is provided in Figure 6.

The diagram in Plate 1 shows an example specification for temporary fencing (a polythene and wood stake style is suggested) which is suitable for this purpose. This fencing is durable, lasts approximately two years and can be easily removed after the works are completed.

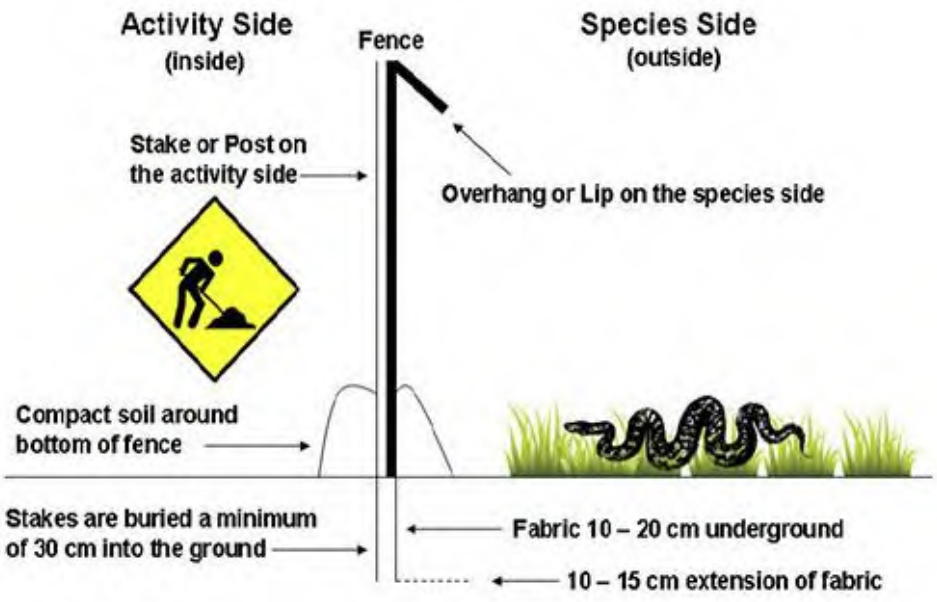

Plate 1 – Example specification for reptile exclusion fencing (Government of Ontario, 2023)

Any entrances or gaps in the fencing (i.e., to allow works access and around the newly created access roads and pathways) must be designed with 'returns' at the ends to direct animals away from the opening. Vegetation on the outer side of the fence must be managed to ensure it does not grow tall enough for animals to get back into the works area. The wooden stakes of the temporary fencing must also be placed on the inner (works) side of the fence to prevent animals climbing back in.

Fencing is to remain in-situ and must be maintained in secure condition throughout the construction phase, to prevent animals from returning to the site during the works. The CEMP document for the site will detail the ongoing monitoring of the fence during the construction phase.

Reptile Translocation

As a 'good' population of slow-worm has been identified, a translocation exercise will be carried out for a minimum of 30 suitable days (English Nature, 2004), to demonstrate that reasonable measures have been put in place to limit the potential for breaches in the legislative protection of reptiles on site. 30 days is considered to likely be sufficient due to the small size of the site and reptiles being recorded in small areas of grassland and ruderal habitat on site. Much of the site is compacted bare ground which is unsuitable for slow-worms. If reptiles continue to be found on the 30th visit, the translocation will continue until there have been five 'clear' days i.e. until reptiles have not been found for five consecutive visits.

The translocation exercise may only be carried out in the active reptile season March to October inclusive, although this also depends on overnight temperatures remaining above 5°C, to avoid animals going into hibernation. The optimum period for capturing reptiles is generally between late April and June, and late August to late September (HGBI, 1998). Translocation visits are to be conducted in line with reptile survey guidance, requiring temperatures of between 8°C and 19°C with no rain, when reptiles are most likely to bask or use refugia to thermoregulate. If it is anticipated that all reptiles have been translocated in a shorter period of time, a trapping period of less than 30 days may be agreed with the LPA. The translocation exercise will only end after 5 'clear' days of finding no animals and is to be agreed following consultation with the LPA and the project's Ecologist.

The translocation exercise comprises the following steps:

- Deployment of artificial refugia at a density of 50 refuges per ha (HGBI, 1998) in all suitable fenced reptile habitat;
- Trapping and translocation of all animals within the suitable habitat to be lost, and any areas likely to be impacted by the construction phase;
- Animals to be transported in low numbers, using appropriate sealed containers with ventilation holes and a small amount of bedding/grass material, as soon as possible to the translocation site;
- Translocated individuals will be checked for injury or disease, and sex and life stage will be recorded; and
- Habitat manipulation (at the discretion of the ECoW) to enhance capture methods, involving carefully reducing the amount of suitable vegetation to create patches of grass which work as islands where remaining reptiles tend to concentrate.

As previously mentioned, the translocation effort normally required for a **good** population of slow worms involves placing a minimum of 50 refuges per hectare, and a minimum of 60 days of trapping in suitable weather conditions, until there have been five days clear with no individuals found (HGBI, 1998). However, it is recommended that 30 days of trapping is likely to be sufficient for this site due to the small size of the site and the small areas of suitable reptile habitat within the site. Therefore, a review of the translocation effort will be undertaken after 30 days. If any changes are considered to the translocation, then this will be agreed with the LPA ecologist. The exact duration of the translocation period is therefore subject to weather conditions and the ability to achieve five 'clear' days.

Vegetation clearance

Once five clear days are achieved, remaining vegetation removal will consist of directional clearance so that suitable reptile habitat is not trampled during this process and to reduce the area reptiles are able to disperse to. Any animals left within the translocation area can then be safely moved to the receptor site. All works must be supervised by a suitably qualified ECoW, and must be carried out during the active season for reptiles (between March and October).

Clearance of vegetation will be completed in two stages:

- Vegetation must be cut down to 30cm in height and the arisings left for at least 24 hours.
- Vegetation will then be cut to ground level. All cuttings / arisings should be removed from the area to prevent reptiles using these vegetation piles for shelter. All vegetation removal should be done by hand and not using a rake in case any reptiles are still present.

Destructive search (top-soil removal)

This will need to take place in all areas of suitable reptile habitat which are being cleared prior to development (patches of grassland and scrub across the site).

This process is completed in two stages. Stage one is a hand / fingertip search and stage two involves topsoil removal.

Stage one will be conducted by an ECoW, who will search the ground for reptiles and remove any potential refuges (i.e. logs, brash, bricks or debris). This will be done at the same time as the grass cuttings which are to be removed. Any reptiles found will be collected by the ECoW and released at the receptor site.

On the completion of stage one, stage two can commence. This stage involves clearing the topsoil from the work area. This must be carried out with an ECoW present and follows the method below:

- The destructive search will be conducted using a medium sized excavator (approximately 8-10 tonnes) with a toothed bucket carrying out a gradual scrape of the top one to two inches (25 – 50 mm) of topsoil;
- The areas where soil is removed will be checked for reptiles by the ECoW and moved where necessary;
- Deeper scrapes will be completed where needed, such as beneath root systems, buried material, cracks or holes in the ground;
- The excavated spoil will be stored, as directed by the ECoW in consultation with the developers, in an area identified as unsuitable reptile habitat (i.e., bare ground already devoid of vegetation) during the topsoil strip; and
- After the strip is completed or a section is completed and a large enough area rendered unsuitable, the excavated spoil will then be compacted to prevent access by reptiles seeking refuge or hibernation within.

A proposed timetable for the works is provided in Table 5. Installation of reptile fencing, reptile displacement (including vegetation clearance) and destructive search can only be conducted during the active reptile season, to avoid disturbing or injuring hibernating reptiles.

Table 5. Proposed Timetable of Works

Proposed Works	J	F	M	A	M	J	J	A	S	O	N	D
Installation of exclusion fencing												
Reptile Translocation												
Reptile Displacement (Vegetation Clearance)												
Destructive Search (Stage 1 and 2)												

Green=Works may proceed; Red = No works can be undertaken; Amber = Works can only be undertaken during suitable weather conditions.

For works to be undertaken in March, there must be a period of five days prior to works where overnight temperatures are consistently above 5 degrees Celsius, to ensure that hibernating reptiles are not disturbed. The same consideration must be made nearing October, where if temperature conditions overnight are consistently below this, works will need to stop as reptiles may be beginning to enter hibernation for winter. This is necessary to avoid the killing or injury of reptiles which would otherwise contravene the relevant wildlife legislation.

4.2.4 Construction-phase disturbance

The disturbance of the reptiles during the construction phase and appropriate mitigation is as described above. If any reptiles are found after the completion of the works to render the site unsuitable for reptiles, the ECoW will be called immediately and any changes or further works required to ensure the site remains unsuitable for reptiles will be carried out.

The temporary fencing will need to be maintained and will be checked daily for damage for the duration of the construction phase. This daily check will be conducted by either the site manager or designated personnel. If damaged, it will be repaired as soon as possible to ensure reptiles do not move back into the active site.

4.2.5 Operational-phase disturbance

The reptile habitat on site is largely isolated from the wider landscape, and it is considered unlikely that reptiles would move back into the site during the operational phase. However, should some connectivity remain, or reptiles exist within the residential gardens to the north, areas of retained grassland on site should be managed under a relaxed mowing scheme to provide an area of suitable habitat and gaps maintained within fences to the north to allow wildlife to pass through the site. A log pile could also be installed within any areas of grassland to provide shelter for reptiles and or other wildlife and invertebrates.

Considering the potential for domestic cats within the proposed development, as well as increased disturbance from residents, enhancing the retained habitats to provide additional shelter and enhanced foraging habitat is encouraged for wildlife.

4.3 ENHANCEMENT

It is a requirement of the National Planning Policy Framework (NPPF) (see Appendix B), the Bridport Area Neighbourhood Plan (2020-2036) (Appendix B) and the mitigation hierarchy (CIEEM, 2024) to provide enhancements for biodiversity as part of development. This will ensure that any residual negative impacts from the proposed development works and operational phase are countered.

On-Site Retained Habitat

Following a full translocation of the slow worm population on site, it is still possible that reptiles could recolonise the site following the completion of the works, once the reptile exclusion fence is removed. Some limited connectivity to gardens of the residential development to the north of the site may remain after the works. For this reason, enhancement measures for reptiles within the site, post-development, are recommended as a precaution. One log pile must be installed in the north-west of the proposed

development site within retained suitable reptile habitat, to provide shelter for any residual reptile population, if present, following the works.

To enhance the landscaped areas of the development site, topsoil preparation and sowing of wildflower meadow mixes will seek to create diverse species rich grassland in the north and west of the site, which will attract a greater diversity of invertebrates for reptiles to feed on - see landscape plan "JBA 23 126 SK02 Rev G Landscape Strategy". Mowing of grassland areas around the site should also be minimised where possible, to create diversity in vegetation height and plant community structure.

Receptor Site

It is recommended that the current management regime of the site (comprising occasional sheep grazing) is continued, to prevent scrub encroachment within the grassland and to maintain a diverse sward. This has been secured within the legal agreement between the Owner and the Developer.

A minimum of two log piles are required to be installed within the receptor site prior to the works and translocation commencing, so that reptiles have an immediate location under which to take shelter once they are moved, as well as providing ongoing places in which individuals can shelter and over-winter safely. See Figure 5 for the location of the two log piles. A small number of artificial refuges may also be added to the site to provide additional shelter and basking opportunities, as long as their cover does not compromise open habitat availability.

The creation of at least one hibernaculum is also recommended to provide hibernation opportunities for translocated individuals. The hibernacula will be created under the supervision of a suitably experienced ECoW. The design of the hibernacula will follow that set out in Plate 2 below. This design includes the use of logs, stones and loose topsoil, with a covering of turf. Materials for the hibernaculum should be sourced from the receptor site itself (where possible) although may include sand and gravel. The turf required to top the hibernaculum can be obtained directly from the area beneath, during its creation.

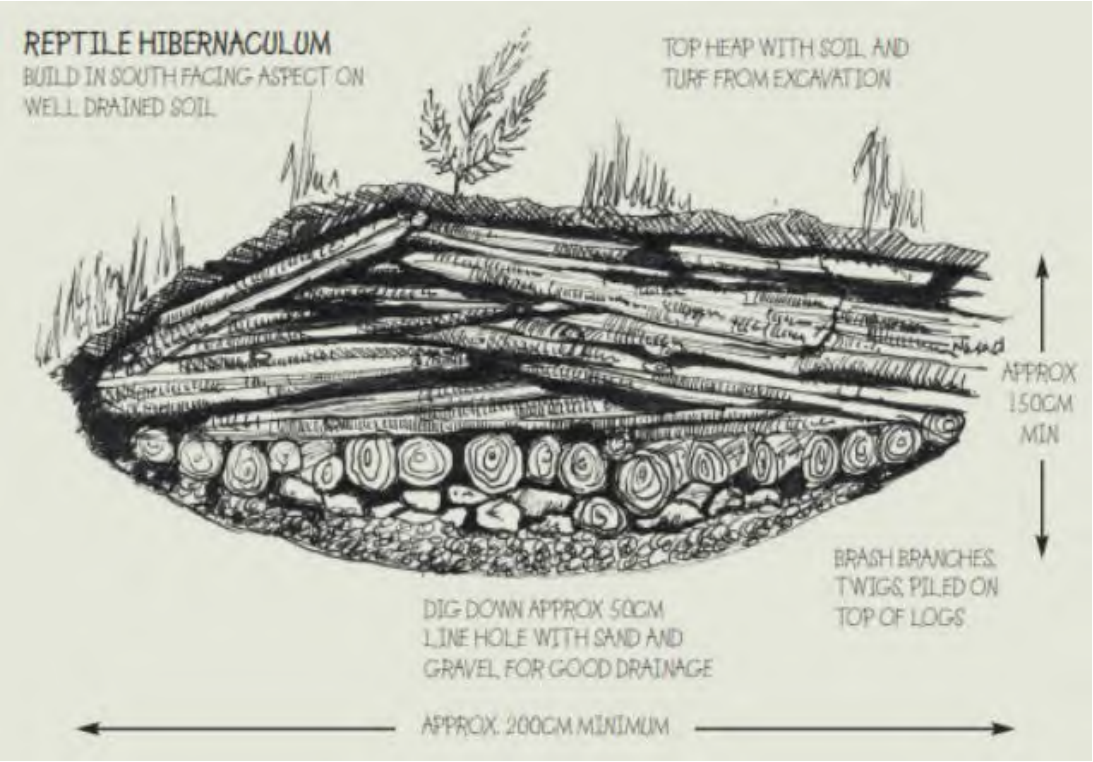

Plate 2 – Hibernaculum Design by Nigel Hand (ARG UK, 2018)

4.4 MONITORING

Surveys to assess the existing population size of reptiles (if present) at the receptor site are not considered to be required and this approach has been agreed through consultation with the LPA ecologist. It is noted that given the suitable adjacent habitat and availability for reptiles to move freely into and out of the receptor site, lack of reptiles identified through surveys at the receptor site would not necessarily infer complete absence. Following the translocation exercise, for the same reason, it would not necessarily be possible to distinguish between newly translocated individuals and any previous existing animals unless a 'capture, mark, recapture' method was employed (which is considered to be unnecessarily invasive).

Despite this, post-translocation monitoring is proposed as this would identify whether the site remains suitable to support a population of reptiles. HGBI guidance recommends that post-translocation monitoring may carried out for the five years following translocation, however in consideration of the reasons above, one year of monitoring is likely to be sufficient.

Monitoring surveys are to be conducted for one year, the following season after the translocation exercise is complete and will comprise a standard reptile survey involving deployment of refugia and seven visits from April to May and September. Results of the monitoring surveys will be detailed within a concise monitoring report and will inform the long-term management of the site by allowing prescriptions to be revised, for the benefit of reptiles and other wildlife.

5.0 SUMMARY

As a result of the findings of this reptile presence/likely absence survey it can be confirmed there is a good, breeding population of slow-worm on site.

There is a risk of the proposals contravening the wildlife legislation through unlawful killing and injury of slow-worms during the construction and operational phases. The existing reptile habitat is limited in size given the numbers of animals, is isolated from the wider landscape, and as such, is likely at carrying capacity and will be unable to sustain a breeding population following development. From this, the following measures are recommended:

- Installation of temporary reptile exclusion fencing along the northern boundary under supervision of the ECoW, prior to any works, to prevent the movement of reptiles back into the development area.
- A 30-day reptile translocation, if agreed by the LPA, to remove all reptiles from the development site, and relocate individuals to a nearby receptor site (unless a shorter period is agreed with the LPA).
- The receptor site is to be managed as it is currently managed, as per the legal agreement, and is prepared according to Section 4.3 with log piles to provide shelter for translocated individuals.
- During the translocation, any suitable reptile habitat that needs to be managed or removed will undergo a two-stage cut under supervision of the ECoW, and is to be carried out during the active reptile season (generally accepted as March-October (weather dependent)).
- Final clearance of suitable vegetation (directional clearance), and destructive search (top-soil clearance) to be conducted under supervision of the ECoW, once translocation is complete. Topsoil to be checked, stored and compacted under supervision in an area of unsuitable habitat i.e. bare ground.
- Enhancements to all retained suitable reptile habitats within the proposed development, including installation of a log pile within the retained north-western corner, species-rich meadow creation and relaxed mowing scheme.
- New fencing around residential gardens to have gaps at the base of the fencing to allow wildlife to move through the site.
- Any changes to the proposed development layout and/or management of the receptor site are to be reviewed by the ecologist to inform any required updates to the reptile mitigation and enhancement strategy.

6.0 CONCLUSION

The development proposals and urban setting of the site offer no suitable alternative other than the translocation of the 'good' population of slow-worms to an off-site receptor area. A suitable site has been identified locally and secured by legal agreement. Translocation and post-translocation monitoring will aim to avoid the illegal killing and injury of slow-worms during the works, and will seek to ensure the favourable conservation status of the species is maintained in line with national and local planning policy.

Mitigation, including a 30-day reptile translocation, is required to allow the works to proceed accordance with legal requirements for the protection of slow-worms. The current proposals will provide enhancements for biodiversity and will include relaxed management of grassland and provision of log piles within retained habitat on-site to benefit reptiles and allow wildlife to colonise and move through the site, post-development.

REFERENCES

- ARG UK (2018). *Advice Note 11: Managing habitat for adders: advice for land managers*. ARG UK: Horspath. Available at: https://www.arguk.org/info-advice/advice-notes/416-11-advice-note-11-managing-habitat-for-adders-advice-for-land-managers-may-2018/file
- CIEEM (2019). Advice Note. On the Lifespan of Ecological Reports & Surveys. April 2019. [online] Available at: https://cieem.net/wp-content/uploads/2019/04/Advice-Note.pdf. Accessed April 2024.
- CIEEM. (2024). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Version 1.3. Retrieved from https://cieem.net/wp-content/uploads/2018/08/EcIA-Guidelines-v1.3-Sept-2024.pdf.
- Edgar, P., Foster, J., and Baker, J. (2010). *Reptile habitat management handbook*. Amphibian and Reptile Conservation: Bournemouth. Available at: https://www.arc-trust.org/habitat-management-handbooks
- English Nature, (2004). *Reptiles: guidelines for developers*. English Nature, Peterborough.
- Froglife (1999). Advice Sheet 10 – Reptile Survey An introduction of planning, conducting and interpreting surveys for snake and lizard conservation.
- Froglife (2016). Surveying for reptiles Tips, techniques and skills to help you survey for reptiles.
- Gent, T. & Gibson, S. (2003). *Herpetofauna Workers' Manual*. JNCC, Peterborough.
- Herpetological Conservation Trust (2008). National Amphibian and Reptile Recording Scheme.
- Herpetological Group of Britain and Ireland (HGBI), (1998). Evaluating local mitigation/translocation programmes: Best-practice-and-lawful-standards. HGBI Advisory notes for Aphibian and Reptile Groups (ARGs).[online] available at https://www.arguk.org/downloads-in-pages/resources/scientific-and-technical-reports/4-evaluating-local-mitigation-translocation-best-practice-and-lawful-standards/file. Accessed October 2025.
- Natural England, (2011). Natural England Technical Information Note TIN102 Reptile mitigation guidelines.
- Government of Ontario (2023). *Reptile and amphibian exclusion fencing*. Available at: https://www.ontario.ca/page/reptile-and-amphibian-exclusion-fencing
- Tetra Tech, (2023). 784-B048171 South Street, Bridport Preliminary Ecological Appraisal Report, s.l.: s.n.
- Tetra Tech, (2024). 784-B048171 South Street, Bridport Biodiversity Net Gain Report, s.l.: s.n.
- The Mammal Society (1997), Domestic Cat Predation on Wildlife.
- Trouwborst, A. & Somsen, H. (2020). *Domestic Cats* (Felis catus) *and European Nature Conservation Law – Applying the EU birds and Habitats Directives to a Significant but Neglected Threat to Wildlife*. Journal of Environmental Law. [online] Available at: https://doi.org/10.1093/jel/eqz035. Accessed March 2024

Please note, the legislation referred to throughout the report is not listed above but is included within Appendix B.

FIGURES

Site Location Plan

South Street, Bridport

Planning Issues Ltd

Legend

Site Boundary

Notes:

Drawn by: DYLAN.GUSSMAN	Figure No. 1
Checked by: IF	Revision No. A
Office: Southampton	10 April 2024

0 10 20 30 40 Meters

Scale 1:1,500 @A3

British National Grid

NGR: 346518E 92268N

TETRA TECH

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Southampton
Hampshire, SO30 2AF

Site Location and Artificial Refugia Location Plan

South Street, Bridport

Planning Issues Ltd

Legend

- Site Boundary
- Refugia Mat Locations

R1 R2 R3 R4 R5 R6 R7 R8 R9 R10 R11 R12 R13 R14 R15 R16 R17 R18 R19 R20 R21 R22 R23 R24 R25 R26 R27 R28 R29 R30 R31 R32 R33 R34 R35 R36 R37 R38 R39 R40 R41 R42 R43 R44 R45 R46 R47 R48 R49 R50

Notes:

Drawn by: HANNAH.HAMILTON
Checked by: IF
Office: Southampton

Figure No. 2
Revision No. A
11 June 2024

0 6 12 18 24 Meters
Scale 1:550 @A3

British National Grid
NGR: 346518E 92268N

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Site Location and Artificial Refugia Location Plan - Survey 1

South Street, Bridport

Planning Issues Ltd

Legend

- Site Boundary
- No reptile present
- Slow worm - Adult
- Slow worm - Adults & Juveniles
- Slow worm - Adults & Sub-Adults
- Slow worm - Juveniles

R1 R2 R3 R4 R5 R6 R7 R8 R9 R10 R11 R12 R13 R14 R15 R16 R17 R18 R19 R20 R21 R22 R23 R24 R25 R26 R27 R28 R29 R30 R31 R32 R33 R34 R35 R36 R37 R38 R39 R40 R41 R42 R43 R44 R45 R46 R47 R48 R49 R50

Notes:

Drawn by: HANNAH.HAMILTON
Checked by: AC
Office: Southampton

Figure No. 3.1
Revision No. A
13 June 2024

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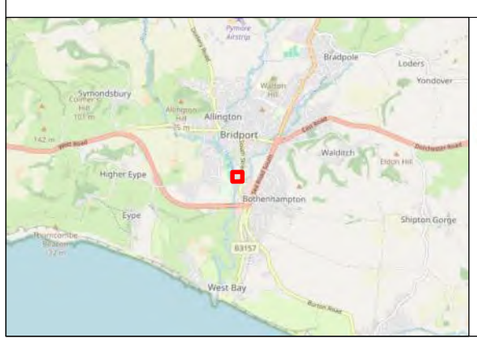
Scale 1:550 @A3

British National Grid

NGR: 346518E 92268N



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Site Location and Artificial Refugia Location Plan - Survey 2

South Street, Bridport

Planning Issues Ltd

Legend

- Site Boundary
- No reptile present
- Slow worm - Adult
- Slow worm - Adults & Sub-Adults
- Slow worm - Juveniles
- Slow worm - Adults, Sub-Adults & Juveniles

Notes:

Drawn by: HANNAH.HAMILTON
Checked by: AC
Office: Southampton

Figure No. 3.2
Revision No. A
13 June 2024

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British National Grid
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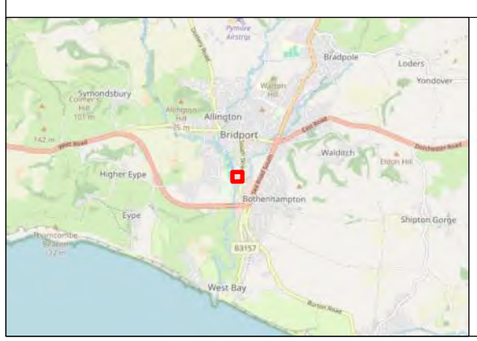

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Site Location and Artificial Refugia Location Plan - Survey 3

South Street, Bridport

Planning Issues Ltd

Legend

- Site Boundary
- No reptile present
- Slow worm - Adult
- Slow worm - Juveniles

R1 R2 R3 R4 R5 R6 R7 R8 R9 R10 R11 R12 R13 R14 R15 R16 R17 R18 R19 R20 R21 R22 R23 R24 R25 R26 R27 R28 R29 R30 R31 R32 R33 R34 R35 R36 R37 R38 R39 R40 R41 R42 R43 R44 R45 R46 R47 R48 R49 R50

Notes:

Drawn by: HANNAH.HAMILTON
Checked by: AC
Office: Southampton

Figure No. 3.3
Revision No. A
13 June 2024

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Scale 1:550 @A3

British National Grid

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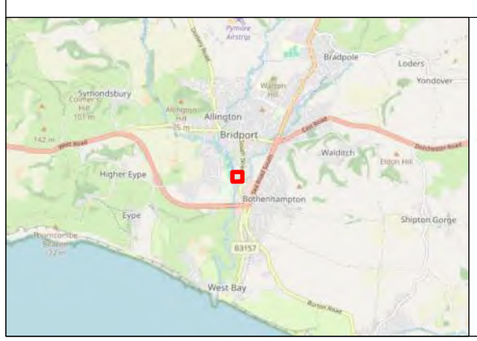

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Site Location and Artificial Refugia Location Plan - Survey 4

South Street, Bridport

Planning Issues Ltd

Legend

- Site Boundary
- No reptile present
- Slow worm - Adult
- Slow worm - Juveniles

R1 R2 R3 R4 R5 R6 R7 R8 R9 R10 R11 R12 R13 R14 R15 R16 R17 R18 R19 R20 R21 R22 R23 R24 R25 R26 R27 R28 R29 R30 R31 R32 R33 R34 R35 R36 R37 R38 R39 R40 R41 R42 R43 R44 R45 R46 R47 R48 R49 R50

Notes:

Drawn by: HANNAH.HAMILTON
Checked by: AC
Office: Southampton

Figure No. 3.4
Revision No. A
13 June 2024

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Scale 1:550 @A3

British National Grid

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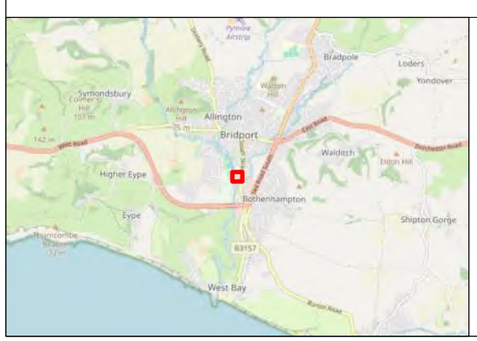

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Hampshire, SO30 2AF

Site Location and Artificial Refugia Location Plan - Survey 5

South Street, Bridport

Planning Issues Ltd

Legend

- Site Boundary
- No reptile present
- Slow worm - Adult
- Slow worm - Juveniles

R1 R2 R3 R4 R5 R6 R7 R8 R9 R10 R11 R12 R13 R14 R15 R16 R17 R18 R19 R20 R21 R22 R23 R24 R25 R26 R27 R28 R29 R29 R30 R31 R32 R33 R34 R35 R36 R37 R38 R39 R40 R41 R42 R43 R44 R45 R46 R47 R48 R49 R50

Notes:

Drawn by: HANNAH.HAMILTON
Checked by: AC
Office: Southampton

Figure No. 3.5
Revision No. A
13 June 2024

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Scale 1:550 @A3

British National Grid

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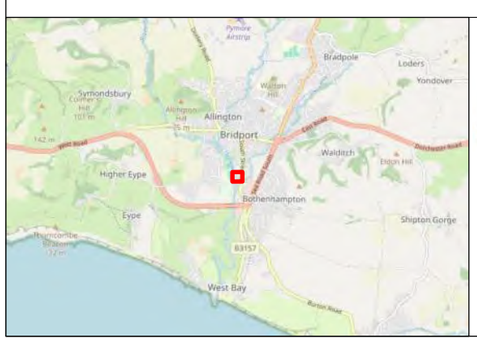

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Site Location and Artificial Refugia Location Plan - Survey 6

South Street, Bridport

Planning Issues Ltd

Legend

- Site Boundary
- No reptile present
- Slow worm - Adult
- Slow worm - Adults & Juveniles
- Slow worm - Juveniles
- Slow worm - Sub-Adults & Juveniles

R1 R2 R3 R4 R5 R6 R7 R8 R9 R10 R11 R12 R13 R14 R15 R16 R17 R18 R19 R20 R21 R22 R23 R24 R25 R26 R27 R28 R29 R30 R31 R32 R33 R34 R35 R36 R37 R38 R39 R40 R41 R42 R43 R44 R45 R46 R47 R48 R49 R50

Notes:

Drawn by: HANNAH.HAMILTON
Checked by: AC
Office: Southampton

Figure No. 3.6
Revision No. A
13 June 2024

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Scale 1:550 @A3

British National Grid

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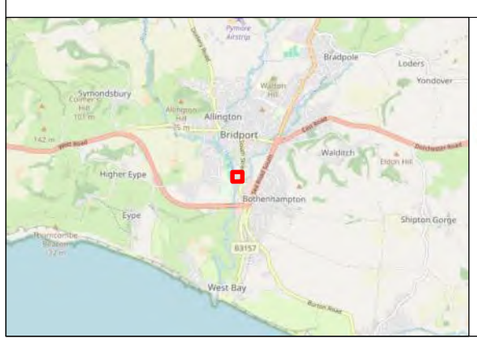

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Site Location and Artificial Refugia Location Plan - Survey 7

South Street, Bridport

Planning Issues Ltd

Legend

- Site Boundary
- No reptile present
- Slow worm - Adult
- Slow worm - Adults & Juveniles
- Slow worm - Juveniles
- Slow worm - Adults, Sub-Adults & Juveniles
- Slow worm - Sub-Adults

R1 R2 R3 R4 R5 R6 R7 R8 R9 R10 R11 R12 R13 R14 R15 R16 R17 R18 R19 R20 R21 R22 R23 R24 R25 R26 R27 R28 R29 R30 R31 R32 R33 R34 R35 R36 R37 R38 R39 R40 R41 R42 R43 R44 R45 R46 R47 R48 R49 R50

Notes:

Drawn by: HANNAH.HAMILTON
Checked by: AC
Office: Southampton

Figure No. 3.7
Revision No. A
13 June 2024

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British National Grid

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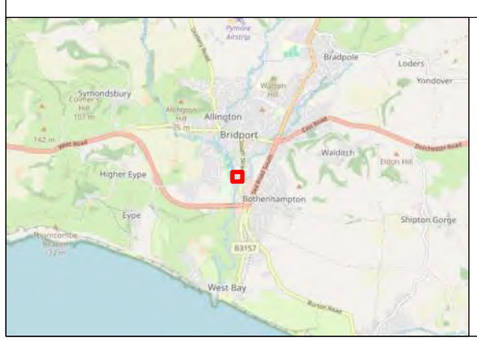

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Environment Agency Flood Defences

South Street, Bridport

Planning Issues Ltd

Legend

- Site boundary
- Demountable Defence
- Embankment
- Engineered High Ground
- Natural High Ground
- Wall

Notes:

Drawn by: Chris.Dawe

Checked by: Alex Coggins

Figure No. 4

Revision No. A

04 September 2025

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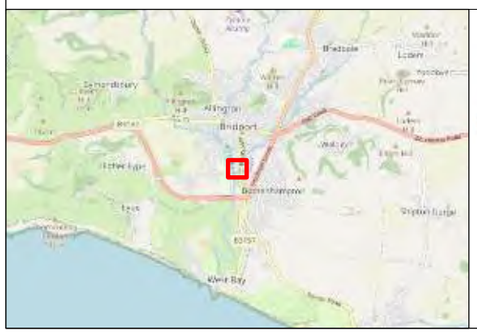
Scale 1:1,000 @A3

British National Grid

NGR: 346518E 92266N



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Sovereign Street
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LS1 4ER

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number: 01959704

Reptile Recptor Site Location Plan

South Street, Bridport

Planning Issues ltd

Legend

Reptile receptor site

Log pile

Notes:

Drawn by: Chris.Dawe

Checked by: Alex Coggins

Figure No. 5

Revision No. A

23 October 2025

0 10 20 30 40 50 Meters

Scale 1:1,000 @A3

British National Grid

NGR: 347095E 98365N

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United Kingdom
LS1 4ER

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Reptile Fencing Plan

South Street, Bridport

Planning Issues ltd

Legend

Site Boundary

Reptile fencing

Notes:

Drawn by: Chris.Dawe

Checked by: Alex Coggins

Figure No. 6

Revision No. A

22 October 2025

0 10 20 30 40 Meters

Scale 1:750 @A3

British National Grid

NGR: 346518E 92266N

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APPENDICES

Appendix A – Report Conditions

Appendix B – Legislation & Policy

Appendix C – Survey results

APPENDIX A: REPORT CONDITIONS

This Report has been prepared using reasonable skill and care for the sole benefit of Planning Issues Ltd. ("the Client") for the proposed uses stated in the report by [Tetra Tech Limited] ("Tetra Tech"). Tetra Tech exclude all liability for any other uses and to any other party. The report must not be relied on or reproduced in whole or in part by any other party without the copyright holder's permission.

No liability is accepted or warranty given for; unconfirmed data, third party documents and information supplied to Tetra Tech or for the performance, reliability, standing etc of any products, services, organisations or companies referred to in this report. Tetra Tech does not purport to provide specialist legal, tax or accounting advice.

The report refers, within the limitations stated, to the environment of the site in the context of the surrounding area at the time of the inspections'. Environmental conditions can vary and no warranty is given as to the possibility of changes in the environment of the site and surrounding area at differing times. No investigative method can eliminate the possibility of obtaining partially imprecise, incomplete or not fully representative information. Any monitoring or survey work undertaken as part of the commission will have been subject to limitations, including for example timescale, seasonal and weather-related conditions. Actual environmental conditions are typically more complex and variable than the investigative, predictive and modelling approaches indicate in practice, and the output of such approaches cannot be relied upon as a comprehensive or accurate indicator of future conditions. The "shelf life" of the Report will be determined by a number of factors including; its original purpose, the Client's instructions, passage of time, advances in technology and techniques, changes in legislation etc. and therefore may require future re-assessment.

The whole of the report must be read as other sections of the report may contain information which puts into context the findings in any executive summary.

The performance of environmental protection measures and of buildings and other structures in relation to acoustics, vibration, noise mitigation and other environmental issues is influenced to a large extent by the degree to which the relevant environmental considerations are incorporated into the final design and specifications and the quality of workmanship and compliance with the specifications on site during construction. Tetra Tech accept no liability for issues with performance arising from such factors.

APPENDIX B: LEGISLATION & POLICY

Wildlife & Countryside Act 1981 (as amended)

This is the principal mechanism for the legislative protection of wildlife in the UK. Since it was first introduced, the Act has been amended several times. All six species of reptile native to the United Kingdom are protected through inclusion under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and benefit from various levels of protection. This legislation makes it an offence to:

- Intentionally or recklessly kill or injure these animals; and
- Sell, offer for sale, possess or transport for the purpose of sale of publish advertisement to buy or sell individual reptiles.

The smooth snake, *Coronella austriaca*; and sand lizard, *Lacerta a*gilis are also listed under Schedule 5 Section 9.4b and 9.4c which makes it an offence to:

- Intentionally disturb while occupying a structure or place used for shelter or protection; and
- Obstruct access to such a site.

Natural Environment and Rural Communities Act 2006

Section 41 (S41) of this Act requires the Secretary of State to publish a list (in consultation with Natural England) of Habitats and Species which are of Principal Importance for the conservation of biodiversity in England. The S41 list is used to guide decision-makers such as public bodies including local and regional authorities, in implementing their duty under Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006, to have regard to the conservation of biodiversity in England, when carrying out their normal (e.g. planning) functions. The S41 list includes 65 Habitats of Principal Importance and 1,150 Species of Principal Importance.

National Planning Policy Framework - Published the 27 March 2012, updated December 2024

National Planning Policy Framework (NPPF) is the top tier of planning policy. The Framework provides guidance to local authorities and other agencies on planning policy and the operation of the planning system. Section 15 relates to 'Conserving and enhancing the natural environment'. Paragraph 187- 201

Relevant policies in relation to planning application include Paragraphs:

"187. Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

188. 'Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework[1] ; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

192. To protect and enhance biodiversity and geodiversity, plans should:

(a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity (2) wildlife corridors and

stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation (3), and

(b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

193. When determining planning applications, local planning authorities should apply the following principles:

(a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

(b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons (4) and a suitable compensation strategy exists; and

(d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

194. The following should be given the same protection as habitats sites:

(a) potential Special Protection Areas and possible Special Areas of Conservation;

(b) listed or proposed Ramsar sites; and

(c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

195. The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site

[1] Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality
[2] Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system

[3] Where areas that are part of the Nature Recovery Network are identified in plans, it may be appropriate to specify the types of development that may be suitable within them

[4] For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat

[5] Potential Special Protection Areas, possible Special Areas of Conservation and proposed Ramsar sites are sites on which Government has initiated public consultation on the scientific case for designation as a Special Protection Area, candidate Special Area of Conservation or Ramsar site

See here for full details: https://www.gov.uk/guidance/national-planning-policy-framework

Local Planning Policy

Bridport Area Neighbouring Plan 2020 -2036

Policy L2: Biodiversity

1. Development proposals will be expected to demonstrate how they will provide a net gain in biodiversity and, where feasible, habitats and species, on the site, over and above the existing biodiversity situation.
2. If significant harm to biodiversity resulting from a development cannot be avoided (For example through locating on an alternative site with less harmful impacts), adequately mitigated, or as a last resort, compensated for, then planning permission will not be supported.

Local Biodiversity Action Plan (LBAP)

Local Biodiversity Action Plans (LBAP) identify habitat and species conservation priorities at a local level (typically at the County level) and are usually drawn up by a consortium of local Government organisations and conservation charities.

Some LBAP's may also include Habitat Action Plans (HAP) and/or Species Action Plans (SAP), which are used to guide and inform the local decision-making process.

APPENDIX C: SURVEY RESULTS

Survey No.	Date	Records					Notes
		Mat No.	Species	No. Adults	No. Sub-Adults	No. Juveniles	
1	08.04.24	1	Slow worm	1♀			
		6	Slow worm	-		1	
		11	Slow worm	4	5		
		26	Slow worm	1♀	-	1	
		27	Slow worm	1♂			
		29	Slow worm	2♂2♀			
		35	Slow worm	1♂2♀			
		36	Slow worm	2♀			
		37	Slow worm	1♂			
		42	Slow worm	1♀			
		49	Slow worm	-		1	
		-	Slow worm	1♀	-	-	Under black mat in centre of the site
2	11.04.24	1	Slow worm	1	1		
		6	Slow worm	2	1	1	
		11	Slow worm	5	2		
		25	Slow worm	1			
		29	Slow worm	1			
		31	Slow worm	1			
		35	Slow worm	3			
		36	Slow worm	1			
		49	Slow worm	-		1	
3	15.04.24	5	Slow worm	1♀			

Survey No.	Date	Records					Notes
		Mat No.	Species	No. Adults	No. Sub-Adults	No. Juveniles	
		6	Slow worm	-		1	
		15	Slow worm	-		1	
		16	Slow worm	-		1	
		22	Slow worm	1♀			
		29	Slow worm	1♀			
		31	Slow worm	1♀			
		33	Slow worm	1♀			
		35	Slow worm	1♀			
		49	Slow worm	-		2	
4	18.04.24	4	Slow worm	1♂		3	
		6	Slow worm	-		3	
		11	Slow worm	1♂2♀			
		15	Slow worm	1♀			
		16	Slow worm	-	1		
		22	Slow worm	1♀			
		29	Slow worm	-	1		
		27	Slow worm	1♀			
		32	Slow worm	1♂1♀			
		35	Slow worm	1♂2			
		36	Slow worm	1♂			
		37	Slow worm	2♀			
		50	Slow worm	1♀			
5	23.04.24	1	Slow worm	1♀			
		3	Slow worm	1♂1♀			

Survey No.	Date	Records					Notes
		Mat No.	Species	No. Adults	No. Sub-Adults	No. Juveniles	
		11	Slow worm	2♂2♀			
		6	Slow worm	-	3		
		7	Slow worm	1♀			
		21	Slow worm	1♂1♀		1	
		29	Slow worm	1♂			
		32	Slow worm	1♂			
		33	Slow worm	1♀			
		35	Slow worm	1♀			
		45	Slow worm	1♀			
		49	Slow worm	-	2		
		50	Slow worm	1♀			
6	01.05.24	6	Slow worm	-	2		
		11	Slow worm	2♂3♀			
		26	Slow worm	1♀			
		29	Slow worm	1♀		1	
		30	Slow worm	1♀			
		32	Slow worm	1♀			
		49	Slow worm	-		2	
7	26.04.24	2	Slow worm	1♀		1	
		5	Slow worm	-		1	
		7	Slow worm	2♀	1		
		10	Slow worm	1♀			
		11	Slow worm	5♂5♀			
		18	Slow worm	-	1		

Survey No.	Date	Records					Notes
		Mat No.	Species	No. Adults	No. Sub-Adults	No. Juveniles	
		22	Slow worm	1♀			
		23	Slow worm	3♀			
		29	Slow worm	2♀			
		32	Slow worm	1♀		1	
		36	Slow worm	1♀			
		42	Slow worm	1♂			
		49	Slow worm	-	1		
		50	Slow worm	1♀			
Key	♂ male, ♀ female,						

Appendix C

Detail of Secured Translocation Site

DATED: 4 SEPTEMBER 2025

ALASDAIR JOHN WARREN

and

CHURCHILL LIVING LTD

A REPTILE TRANSLOCATION AGREEMENT

in respect of land on the west side of Slape Hill, Netherbury, Bridport

THIS AGREEMENT is made the ....4TH..... day of SEPTEMBER 2025

BETWEEN

(1) **ALASDAIR JOHN WARREN** of Middle Farm, Long Bredy, Dorchester, Dorset, DT2 9HW ('the **Owner'**) and

(2) **CHURCHILL LIVING LTD** (incorporated and registered in England and Wales under company number 06260373) whose registered office is at Churchill House, Parkside, Ringwood, Hampshire BH24 3SG ('the **Developer'**)

1 **Definitions and Interpretation**

1.1 In this Agreement:

"**Land**" means the land on the west side of Slape Hill, Netherbury, Bridport registered at HM Land Registry under Title Number DT349839 as shown on the plan annexed at Annex 1 and edged red.

"**Implemented**" means the date on which a Development commences by the carrying out of a material operation as specified in section 56(4) of the Town and Country Planning Act 1990;

"**Mitigation Measures**" means the relocation of slow worms from the Property to the Release Area and the future management plan for The Land.

"**Planning Application**" means the planning application submitted to the local planning authority bearing the reference number P/FUL/2024/04613 for the redevelopment of the Property or such other planning application submitted for the Property by the Developer.

"**Planning Permission**" means the planning permission to be issued pursuant to the Planning Application (and for the avoidance of doubt includes a planning permission granted following an appeal);

"**Premium**" means the sum of £1,000.00 for the right to relocate slow worms from the Property on to The Land.

"**Property**" means the land on the south side of 162 South Street, Bridport DT6 3NP registered at HM Land Registry under Title Number DT255329 and land on the south side of Doctor Roberts Close, Bridport registered at HM Land Registry under Title Number DT399092.

"**Release Area**" means that part of The Land as shown on the plan annexed hereto at Annex 2 and edged red.

1.2 Words importing one gender shall be construed as importing any other gender.

1.3 Words importing the singular shall be construed as importing the plural and vice versa.

1.4 Words importing persons shall be construed as importing a corporate body and/or a partnership and vice versa.

1.5 Where any party comprises of more than one person the obligations and liabilities of that party under this Agreement shall be joint and several obligations and liabilities of those person.

1.6 The clause headings do not form part of this Agreement and shall not be taken into account in its construction or interpretation.

1.7 Any reference to a clause or a paragraph or a schedule is to one in this Agreement so numbered.

2 Agreement

2.1 The proposed Planning Permission to be granted pursuant to the Planning Application will require the development of the Property to be carried out in accordance with the Mitigation Measures.

2.2 The Developer agrees to pay the Owner the Premium within 5 working days of the date the county council's ecologist confirms to the Developer that the Land is suitable for the Developer to undertake the Mitigation Measures.

2.3 Subject to the Developer paying to the Owner the Premium the Owner hereby permits the Developer to undertake the Mitigation Measures on The Land.

2.4 Subject to payment of the Premium the Owner hereby permits the Developer from the date which is three years from the date the Planning Permission is Implemented to undertake the relocation of the slow worms from the Property to the Release Area either in whole or in phases in either case.

2.4 The Developer will confirm to the Owner in writing the completion of the translocation of the slow worms.

3 Restriction on Assignment

3.1 This Agreement may be assigned by the Developer without the consent of the Owner subject always to the Developer notifying the Owner in writing of such assignment and such assignee entering into a deed of covenant with the Owner to observe and perform the obligations contained in this Agreement.

3.2 The Owner may sell its interest in The Land subject always to the Owner notifying the Developer (or its successors) in writing and such buyer covenanting with the Developer and its successors in title to the Property to observe and perform the provisions of this Agreement.

4 The Owner Covenants

4.1 The Owner hereby grants the Developer the right at all times with or without its servants workmen or contractors together with all necessary implements tools and vehicles along routes to be defined from time-to-time by the Owner and upon reasonable notice agreed in writing between the Owner and the Developer to enter upon The Land for the purpose of undertaking the reptile Mitigation Measures.

4.2 The Owner covenants that it will not do or allow to be done anything upon the Release Area which may reasonably be expected to damage the wellbeing of the slow worms moved from the Property to the Release Area and that it will exercise its best endeavours to maintain the Release Area in such a condition so as to ensure the wellbeing of the

slow worms moved from the Property to the Release Area (including but not limited to occasional pulse-grazing by sheep during the relevant seasons) and in accordance with any requirements or conditions of the Planning Permission.

4.3 In the event that the Owner shall transfer, assent or lease the Release Area the Owner shall procure that the transferee or tenant (as the case may be) enters into a new licence with the Developer in the form of this Agreement.

5 **The Developer Covenants**

5.1 The Developer will not do or allow to be done in or upon The Land or its entrances, gates, fences, bridges, drains or hedges anything which may reasonably be expected to cause damage and that it will use reasonable endeavours to protect The Land from any damage which may arise as a result of the use and carrying out the Mitigation Measures by them or their workmen or others authorised by it in the exercise of the rights hereby granted.

5.2 The Developer will promptly reimburse the Owner its reasonable and properly incurred costs in making good any damage to The Land or its entrances, gates, fences, bridges, drains or hedges caused by the Developer or their workmen or others authorised by the Developer in the exercise of the rights hereby granted.

6 **Nature of this Agreement**

This is not a deed and has not been executed as a deed by the parties.

7 **Notices**

7.1 Any notice served by the Developer on the Owner must be sent to the Owner's address at the beginning of this Agreement and any notice served by the Owner on the Developer must be served on the registered office of the Developer.

7.2 Any notice served under this Agreement may be personally delivered or sent by first class recorded delivery post.

7.3 A notice given under this Agreement will not have been validly given or delivered if sent by e-mail unless for each and every notice where the parties wish to serve such notice by email the Developer and Owner prior to service of such notice agree by telephone that the notice may be served by email.

8 **Contracts (Rights of Third Parties) Act 1999**

For the purpose of the Contract (Rights of Third Parties Act 1999) it is agreed that nothing in this Agreement shall confer on any third party any right to enforce or any benefit of any term of this Agreement.

IN WITNESS whereof the parties hereto have hereunto set their hands the day and year first before written

SIGNED by and for and on behalf of
ALASDAIR JOHN WARREN:

[redacted] .....

SIGNED by and for and on behalf of
CHURCHILL LIVING LTD:

[redacted] .....

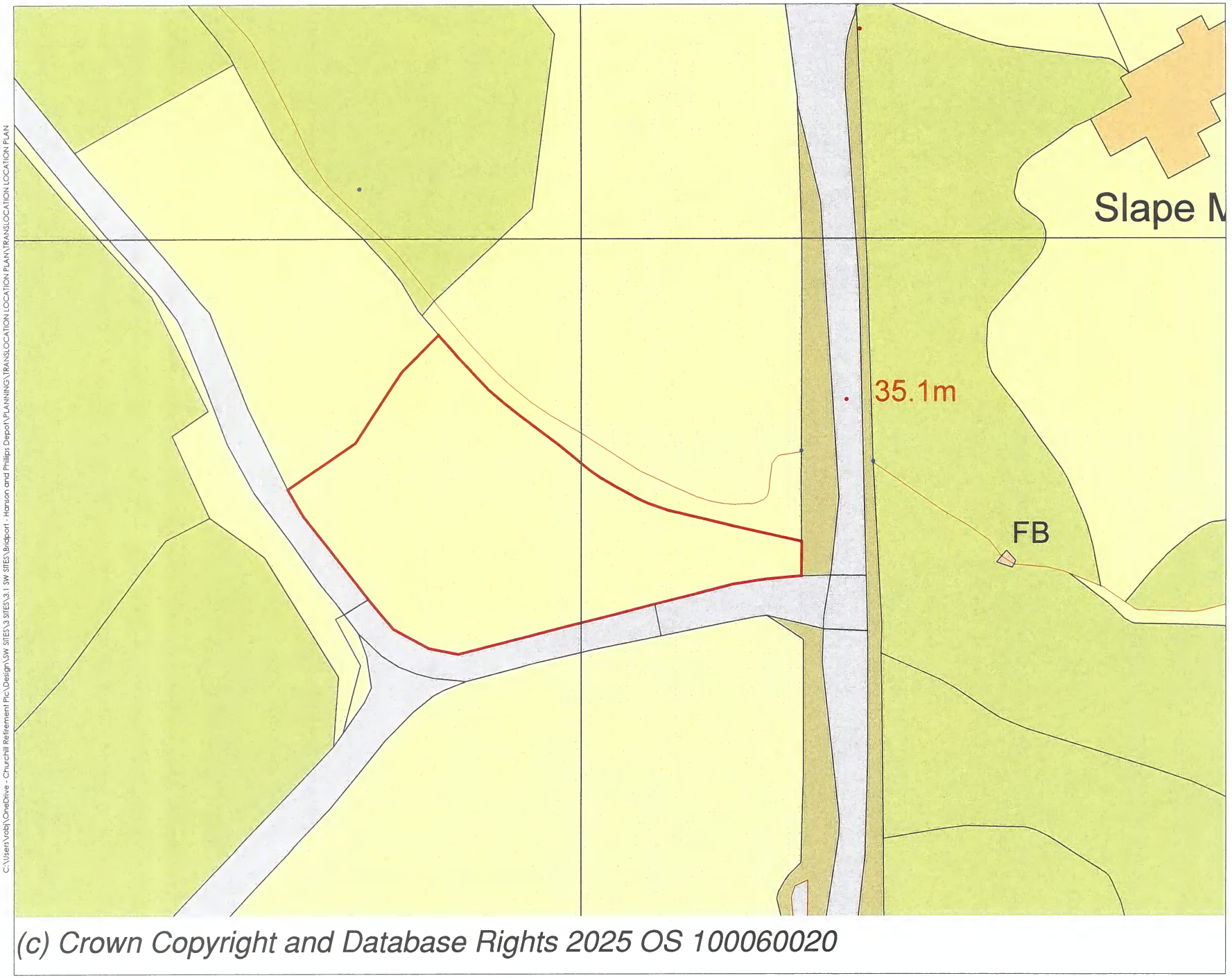
GARY NEIL DAY

Annex 1
Plan

HM Land Registry
Official copy of title plan

Title number **DT349839**
Ordnance Survey map reference **SY4698SE**
Scale **1:2500**
Administrative area **Dorset**

Annex 2
Plan



REVISIONS

Rev.	Date	By

SITE ADDRESS

Slape Hill,
Netherbury,
Bridport,
DT6 5LH

Client

Churchill Living
Your lifestyle • Your choice

Proposed Retirement Living Apartments
Hanson and Phillips Depot
Bridport DT6 3NP

TRANSLOCATION SITE LOCATION PLAN

Scale	1:500 @ A3	Date	August 2025
Drawn	RJ	Checked	RJ
Drawing No.			Rev.

10128BP - PA99 -

planningissues
TOWN PLANNING AND ARCHITECTURE
Churchill House * Parkside * Ringwood * Hampshire * BH24 3SG
Tel: (01425) 482375 E-mail: design@planningissues.co.uk

PLOT DATE: 28 August 2025