

Penny Canning

From: Emily Otter
Sent: 23 October 2024 09:34
To: Penny Canning
Cc: planningwest
Subject: Planning application P/FUL/2024/04613

Follow Up Flag: Follow up
Flag Status: Flagged

Good morning Penny,

Ecology

The application is within the scope of the Dorset Biodiversity Appraisal Protocol (DBAP) criteria which includes proposals which will have an impact on an area greater than 0.1ha, development on sites where there are known protected species or important habitats/habitat features and development which is likely to have an impact on biodiversity.

The Natural Environment Team (NET) notes the submission of an EclA in support of the application, however this has not been submitted to NET for review under the DBAP and as such has not yet been approved. We recommend that this information is submitted to NET directly for review, with the appropriate fee, to ensure compliance with wildlife legislation, NPPF (2023) and that biodiversity mitigation and enhancements are secured.

Biodiversity Net Gain (BNG)

The BNG assessment and metric do not discuss whether there is any species mitigation which should be taken into account when calculating the net gain. Provision of habitats for species mitigation cannot contribute to a net gain, these measures can only contribute to achieving no net loss. There is mitigation proposed for loss of reptile habitat however this has not been quantified, therefore I cannot be certain that the proposals achieve the minimum 10% net gain.

These two issues are best reviewed in tandem, as species mitigation proposals will impact the BNG calculations and what can be counted as a gain.

Kind regards,
Emily

Emily Otter
Senior Ecologist
Place Services
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From: Planning No Reply <planning-no-reply@dorsetcouncil.gov.uk>
Sent: Wednesday, October 2, 2024 12:42 PM
To: Natural Environment Team <naturalenvironmentteam@dorsetcouncil.gov.uk>
Subject: Planning application P/FUL/2024/04613

Please see the attached correspondence relating to planning application
P/FUL/2024/04613 Proposal: 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 Location: Land to Rear of 156-172
South Street
Bridport.
DT6 3NP

Claire Tuck

From: Emily Otter
Sent: 10 February 2025 10:17
To: Penny Canning
Subject: P/FUL/2024/04613 Ecology response

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Good morning Penny,

Please find comments on ecology below, these have been provided in lieu of the applicant engaging with the Dorset Biodiversity Appraisal Protocol. Overall, we cannot support the application as it is currently presented, however there is potential that these points can be overcome with further consideration by the applicant.

Ecology

Impacts to European designated sites

The Preliminary Ecological Appraisal (PEA) notes that there is potential for the proposal to impact the Sidmouth to West Bay, Lyme Bay and Torbay, and Chesil & The Fleet SACs through the hydrological link between the development site and the SACs, and has recommended an Appropriate Assessment is completed. I would advise the LPA consult the Dorset Council Environmental Assessment team and Natural England on this aspect.

Reptiles

The proposals do not provide evidence that the mitigation hierarchy has been applied in regard to reptiles. The current design does not maintain a N-S connection across the site as recommended by the Reptile Survey Report (June 2024). There is no explicit reason given on why this cannot be achieved or the impact on not achieving it on the local reptile population. Instead, reptile translocation offsite is proposed. Translocation should be the last resort, as specific by Natural England's Standing Advice for reptiles ([Reptiles: advice for making planning decisions - GOV.UK](#)). Further to the lack of information as to why translocation is the only option, the PEA does not provide sufficient certainty regarding translocation of the reptiles offsite. Full details of the receptor site should be provided, which will include written agreement from the land-owner/manager, to ensure this does not pose a block to building the proposal, should it be approved.

Further information requested prior to determination

Indication of how the mitigation hierarchy has been applied in regard to reptiles, and if translocation is proposed, full details of reptile translocation in line with the requirements of the Natural England standing advice.

Recommendations for conditions on any permission

- Table 4 of the PEA provides adequate mitigation measures for species (aside from reptiles and bats, as above) and should be secured on any permission.
- The lighting scheme as described in table 4 of the PEA should be subject to a separate condition, to be agreed with the LPA prior to first occupation. This condition must secure a dark corridor of a minimum 10m width from the river corridor due to the presence of light averse species in the local area which may use the river corridor for commuting/foraging.

- A Construction Environment Management Plan should be subject to a separate condition, to be agreed with the LPA prior to any construction/site clearance. This must include mitigation for all construction impacts identified within the PEA.

Biodiversity Net Gain

The application has indicated that offsite biodiversity units will be obtained to provide the required 10% net gain in habitats and watercourses, with a 10% net gain being achievable onsite for hedgerows. BNG does not take protected species into account, therefore guidance is that habitats required for species mitigation can only contribute to providing no net loss, the 10% net gain must be provided on top of this. The metric calculation submitted does not appear to take species mitigation into account (reptile habitat, dark corridors for bats), it does not separate out the areas of habitats required for species mitigation from those which can be considered a net gain. At the pre-commencement stage, we will expect the metric to be recalculated to take species mitigation into consideration, this may impact the number of offsite units required to achieve the 10% net gain. We also note the comments from the Environment Agency and advise that changes to the habitats proposed within the riparian zone have the potential to impact the metric calculations and the number of offsite river units required to achieve the 10% net gain. At the pre-commencement stage we will require evidence that the correct number and type of units have been bought from a registered biodiversity gain site.

Kind regards,
Emily

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