

Thank you for consulting the GMEU

Summary

Further information is recommended on biodiversity net gain. Other ecological issues relating to the SBI, otter, bats, nesting birds and invasive species can be dealt with via condition and or informative.

Pilsworth Fisheries Site of Biological Importance

The development falls within the Pilsworth Fisheries SBI. I am satisfied however that the development will not directly impact any key features of the SBI and that the increased recreational pressure is also unlikely to have any significant effects given the main value of the site relates to the large areas of open water and the bird surveys do not indicate significant numbers of any priority species. I agree however with the consultant that measures need to be put in place during construction to prevent accidental spillages in to the reservoir or watercourses. I therefore recommend a condition along the following lines is applied to any permission.

No development, site clearance, earth moving shall take place or material or machinery brought on site until a method statement to protect the Reservoir and watercourses from accidental spillages, dust and debris has been supplied to and agreed by the LPA. All measure will be implemented and maintained for the duration of the construction period in accordance with the approved details.

With regards the drainage post-development, I note the proposed SUDs ponds which I welcome. I am not however qualified to determine whether or not these are adequate and will rely on the EA/Local drainage consultees response.

With regards soft landscaping, I recommend given its location within an SBI, that locally native species are utilised. See below.

Otter

Evidence of otter activity has been recorded within the wider site, but not within the footprint of the proposed development and the levels of activity recorded not significant. Given its location and scale I am satisfied that the risks of a holt being present are very low and that the fishery is likely a foraging area for otter elsewhere in the catchment. A pre-development check has been recommended by the consultant and I would regard this as reasonable. I therefore recommend a condition along the following lines is applied to any permission.

Prior to any earthworks or vegetation clearance a survey for otter will be carried out and supplied to and agreed in writing by the LPA

Bats

Bats are known to forage over the reservoir. No roosting habitat will however be lost, the only potential effect being from any new external lighting along the access road or around the café and boat house. Given the scale of the site, I accept that any such lighting is very unlikely to have a significant adverse effect on the foraging and commuting of bats through the site but I would still recommend that best practice is observed and the lux level on the water and to adjacent habitat minimised. I therefore recommend a condition along the following lines is applied to any permission.

Prior to development an external lighting design strategy shall be submitted to and approved in writing by the LPA. The strategy shall:

- *Identify areas/features on site that are potentially sensitive to lighting for bats;*
- *show how and where street lighting will be installed and through appropriate lighting contour plans demonstrated clearly that any impacts on bats are minimised;*
- *Specify frequency and duration of use.*

All external lighting shall be installed in accordance with agreed specifications and locations set out in the strategy.

Other Protected Species

I agree with the consultant that it is very unlikely that any other protected species will be adversely effected. No further information or measures are required.

Nesting Birds

Trees and scrub will be lost, potential bird nesting habitat. The proposed boat house could also encroach in to marginal vegetation utilised by waterbirds. All British birds nests and eggs (with certain limited exceptions) are protected by Section 1 of the Wildlife & Countryside Act 1981, as amended. I recommend a condition along the following lines be applied to any permission.

No works to trees or shrubs or removal of waterside vegetation shall occur between the 1st March and 31st August in any year unless a nesting bird survey method statement by a suitably experienced ecologist has been supplied to and agreed in writing by the LPA.

Invasive Species

Himalayan balsam and Nuttall's waterweed were recorded both listed under schedule 9 part 2 of the Wildlife & Countryside Act 1981 (as amended). Nuttall's waterweed is an aquatic species found throughout Pilsworth Fisheries. Eradication will not be feasible and largely avoidable given little work is proposed in the water. Himalayan balsam is also widespread in this locality and localised control and biosecurity measures during construction all that is reasonable to request. I therefore recommend a condition along the following lines is applied to any permission.

Prior to any earthworks or vegetation clearance a method statement detailing biosecurity and control measures for himalayan balsam and nuttall's waterweed should be supplied to and agreed in writing to the LPA. The agreed method statement shall be adhered to and implemented in full unless otherwise agreed in writing by the LPA.

Contributing to and Enhancing the Natural Environment & Biodiversity Net Gain (BNG)

Section 180 of the NPPF 2023 states that the planning policies and decisions should contribute to and enhance the natural and local environment. The development will result in small losses of vegetation, with soft landscaping proposed. Wildlife issues are restricted primarily to nesting birds, with potential adverse effects on otter and bats. Given the scale of the wider site, on-site mitigation and 10% BNG should not be an issue.

A statutory metric has been provided. This indicates 10% BNG will occur, which as noted, I accept should be achievable on the site. I was not however unable to locate a biodiversity net gain statement or assessment to accompany the metric, I was also unable to find a UK HAB map of the baseline and post development habitats or a detailed soft landscape plan to cross reference with the post development habitat proposals.

I therefore recommend that prior to determination a BNG Statement/assessment, UK HAB plans and soft landscape plan for the entire site are provided.

With regards the schematic soft landscape plan around the café and car park that has been provided, in general I have no issues with the proposals. I would however recommend that given this is an SBI, all planting is locally native. I would therefore recommend removal of *Acer campestre* – field maple and *Sorbus aria* – Whitebeam from the rural tree planting as well as *Crataegus laevigata* – midland hawthorn.

Bird boxes should also be provided as mitigation as well as bat boxes as enhancement. The details can be conditioned.