Ecology Consultation

Proposal:		**Location:**
Outline application with all matters reserved except for access via Peterborough Road for the demolition of 107 Peterborough Road, and the development of up to 185 dwellings (Use Class C3), public open space and associated infrastructure		Land West Of Peterborough Road Farcet
Dc Case Officer: LT	**Ecology Officer:** ET	**Application Ref. No:** 25/00892/OUT

Reconsultation comments in green.

Submitted Plans and Documents Reviewed

- Arboricultural Assessment, received 16/05/2025.
- Bat Report parts 1 and 2, received 16/05/2025.
- Habitat and Protected Species Suitability Report, received 16/05/2025.
- Illustrative Masterplan, received 16/05/2025.
- Reptile Report, received 16/05/2025.
- Wintering Bird Report, received 16/05/2025.
- Baseline Habitat Plan, received 16/05/2025.
- Breeding Bird Report, received 16/05/2025.
- Revised Statutory Biodiversity Metric Calculation Tool, received 05/06/2025
- Consultee Comment - Urban Design, received 18/06/2025
- Consultee Comment - Peterborough City Council, received 08/07/2025
- Design and Access Statement, received 21/11/2025
- Biodiversity Metric Calculation Tool, received 21/11/2025
- Illustrative Masterplan, received 21/11/2025
- Drainage Response to PCC Comments, received 06/11/2025
- Ecology Response, received 21/01/2026

Reconsultation Conclusion

Most requested amendments have been addressed or can now be delt with by condition or at the reserved matter stage.

If the case officer is minded to progress the application some further amendments are required at the outline stage. These include amendments to; baseline habitat, and D2 condition enhancements/western RLB location.

Assessment

Baseline habitats:

Clarification/amendments are required on the following points:

- Northern non-arable parcel is currently mapped as only other neutral grassland. It contains scrub parcels larger than the appropriate MMU (25m2) which need to be included in the baseline.

Mapping bramble and mixed scrub doesn't effect the distinctiveness but mixed scrub in moderate condition has twice the habitat units per ha as poor condition other neutral grassland. Accurate mapping of the baseline is required to prevent under-valuation of habitats.
Approximately 0.1ha of mixed scrub in moderate condition has not been mapped. The general area is mapped in the Arboricultural Assessment (G12) and is clearly visible in aerial photography. Following a site visit and mapping using UKHab mapping standards, the area below has been identifying as mixed scrub in moderate condition. It must be mapped as such in the baseline.



- Northern arable boundary
  - TL2 – Photograph 8 shows evidence of a hedgerow along the ditch and aerial imagery shows trees are present along this boundary. This needs to be recorded as Native hedgerow with trees.

Site visit confirms the understory forms part of adjacent bramble scrub.

  - H1 – Photograph 1 and 5 show evidence of trees within the hedgerow. As with TL2, this needs to be assessed and recorded correctly as Native hedgerow with trees.

- Northern area of developed land sealed surface shows >10% vegetation cover so should be recorded as ruderal/ephemeral in good condition (according to 'photograph 6: area of colonised hardstanding' passing criteria B,C,D)

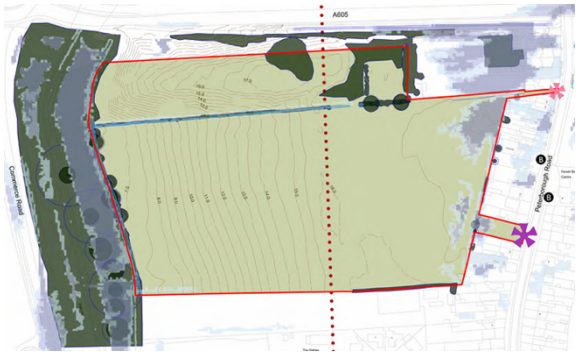
Amended to include ruderal/ephemeral. Proposed condition accepted.

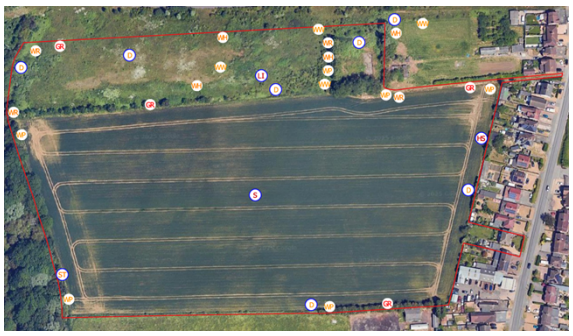
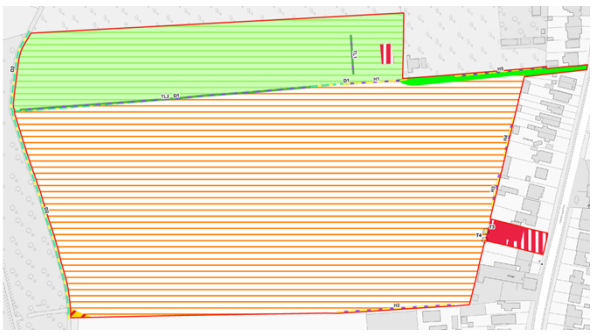
- Please submit condition assessments.

Submitted.

Clarification on western red line boundary location is required as contradictory mapping has been submitted. Baseline habitat maps show the boundary stopping short of the woodland, whereas the Illustrative Masterplan shows it extending further with the site containing areas of woodland but no woodland is included in the maps or baseline metric tab. Overlaying the habitat baseline over aerial imagery shows the RLB extending into the woodland area (below). If woodland is included within the RLB, it will need to be included in the baseline habitat assessment.

Amendments submitted and accepted.



Section 106 Requirements:
Based on the submitted Illustrative Masterplan, the development proposes to deliver significant onsite enhancements. A Section 106 agreement will be required to monitor onsite habitat provision given the scale of the development. To sign the Section 106 at outline stage, the following documents will be required.

- Post-intervention habitat plan.
- Completed metric with proposed habitat conditions.
- HMMP

An HMMP has not been submitted but can be secured at the reserved matters stage along with final post-intervention habitat design.

SuDS:
Based on the Illustrative Masterplan, the organic design of the SuDS given its location adjacent to the woodland is welcomed. When submitted, further design details should maintain the sympathetic outline by following CIRIA's SuDS Manual (Section 6.3: SuDS Design Characteristics to Support Biodiversity). This will maximise the systems ecological benefits and in line with the following:

- NPPF Dec 2024 paragraph 182. "*Applications which could affect drainage on or around the site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff, and which are proportionate to the nature and scale of the proposal. These should provide multifunctional benefits wherever possible, through facilitating improvements in water quality and biodiversity, as well as benefits for amenity. […]*"
- Policy LP30 of the Huntingdonshire Local Plan to 2036 states "*In seeking to provide net gains for biodiversity reference should be had to the Natural Cambridgeshire publication 'Developing with Nature Toolkit' and the proposal should prioritise measures that: … j)* ***contribute to the provision of multi-functional green infrastructure to enhance ecological networks*** *and the Green Infrastructure Priority Area*". Given the adjacent woodland and Stanground Lode, enhancement following CIRIA's SuDS Manual would ensure the development enhances local ecological networks to comply with policy.

- The Cambridgeshire Flood and Water SPD 2017 highlights a requirement in the design of attenuation ponds to ensure they conserve, accommodate and enhance biodiversity. Through careful design, SuDS can respect, enhance and connect local habitats and support biodiversity.
- Official DEFRA Guidelines (National standards for sustainable drainage systems (SuDS), Standard 6: biodiversity, 6.7), lists requirements the final SuDS design must demonstrate. It is expected these will be followed.
- As discussed in *Biodiversity net gain. Good practice principles for development. A practical guide* (Ciria 2019) (page 8), Biodiversity Net Gain does not account for all aspects of biodiversity and a qualitative approach should also be taken during design to capture all aspects of biodiversity and especially to demonstrate that the net gains are proportionate to biodiversity surrounding the development. Providing diverse and structurally complex habitats beyond the statutory requirements of BNG (e.g. creating SuDS as detailed in CIRIA's SuDS Manual Section 6.3) ensures qualitative aspects of biodiversity not covered by the metric, such as connectivity, flood mitigation, pollination, and carbon storage, are provided by the development.

As recognised in the CIRIA SuDS Manual (C753), water within a SuDS system is essential for the growth and development of plants and animals and biodiversity value can be delivered on any scheme from small, isolated systems to large strategic developments. Effective integration will also require carefully researched and selected plants, which work to improve the local green infrastructure and enhance biodiversity.

> Noted in Ecology response. Details of SuDS design and planting specification should be secured at the reserve matters stage.

Southern Boundary Dark Corridor:

The Bat Report (March 2025) states a total of eleven species or species groups use the southern boundary hedgerow, included multiple species especially sensitive to artificial light such as Myotis spp., and Brown long-eared bats.

The Illustrative Masterplan (March 2025) currently proposes private gardens backing directly onto the southern boundary. As it is not possible to secure lighting within private gardens, it cannot be guaranteed the boundary will remain unlit.

Light disturbance will reduce the availability of foraging areas for bat species, in particular those sensitive to light. Lighting of any areas used by bats for commuting or foraging represents an obstruction that would require bats find alternative and less efficient routes or could fully prevent foraging at this location, negatively affecting their energy reserves and overall fitness thus impairing their ability to survive.

Paragraph 5.6 of The Bat Report states that in addition to the proposed landscaping, the retention of dark corridors along hedgerows and trees will allow the continued provision of commuting opportunities. The recommended retention of dark corridors in paragraph 5.7 to continue their use as commuting and foraging habitat is agreed with. Additionally, the unvegetated length of the southern boundary will require a dark corridor to protect its commuting value to bats traveling to and from the hedgerow to forage as species particularly sensitive to light disturbance are confirmed to use the area (Myotis and Plecotus spp.).

Therefore, failing to provide a dark corridor that adequately protects the southern boundary hedgerow, its associated foraging grounds, and the commuting route that leads to it, constitutes a disturbance likely to impairing the ability of the bats to survive, as required by Regulation 43 of *The Conservation of Habitats and Species Regulations 2017 (as amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019)*.

Without the ability to secure a dark corridor along the southern boundary to protect the bats commuting route/foraging ground, the development does not comply with the above legislation. It is recommended the proposed dwellings be moved away from existing

boundary and a buffer zone and appropriate lighting scheme is proposed to ensure a dark corridor is retained.
Additionally, the site-wide lighting scheme should follow ILP guidelines *'Guidance Note GN/08/23: Bats and Artificial Lighting at Night*'. It is recommended lighting contour plans be submitted prior to determination as the impact of lighting on bats foraging and commuting habitat impairs their ability to survive so forms a material planning consideration.

Southern Boundary Design:
Following the advice in paragraph 4.54 of ILP's Guidance Note GN/08/23: Bats and Artificial Lighting at Night and following the mitigation hierarchy by first avoiding impacts, a dark corridor at <0.2 lux will be required along the whole southern boundary.
Commuting corridor:
As the unvegetated western length of the boundary offers limited foraging potential, only its commuting capacity requires protection and a 5m wide dark corridor will be sufficient (Fig. 3. Downs and Racey, 2006), with a further 5m lighting buffer zone created to cause a gradual decrease in lighting from the developed zone, rather than distinct cut-off.
The inclusion of a lighting buffer zone follows the advice and recommendations in:

- Paragraph 4.27 and 4.28 of ILP's Guidance Note GN/08/23,
- 1.3 of The Habitat and Protected Species Suitability Report ("*Habitats of greatest value onsite included the hedgerows and lines of trees, which should be retained, buffered and incorporated into the green infrastructure provision where possible*.") and
- 5.7 of The Bat Report ("*Under the current proposals, most of the internal hedgerows and the boundary features are to be retained. The retention of these features as green corridors and landscape buffers will allow bats to enter the development area and continue to utilise the area for foraging and commuting.*").

The lighting buffer zone should contain supporting habitat such as meadow but can receive reduced light levels and remaining within the public realm, providing useable area for the development. Lighting design within the lighting buffer zone should follow pages 33 and 34 of ILP's Guidance Note GN/08/23. Planting of additional hedgerow along the boundary would reinforce the boundaries commuting capacity.
Foraging ground:
To retain the eastern hedgerow's foraging capacity, a buffer strip adjacent to the boundary/hedgerow will need to be retained as part of the dark corridor. A precautionary approach must be taken when deciding the width of this buffer as the foraging behaviours of different species are understudied regarding foraging distance from linear features. Downs and Racey (Downs, N.C. & Racey, P.A. (2006). *The use by bats of habitat features in mixed farmland in Scotland*. Acta Chiropterologica 8:169-185.) showed *P. pygmaeus* and *P. pipistrellus* foraging range extends to at least 42m from a linear feature in mixed farmland. Using this value as proxy for all bat species, a dark corridor of 20m with a further 10m of lighting buffer zone (designed as above) is required. Species rich meadow, traditional orchard or habitat of similar invertebrate value will need to be provided within the 30m buffer area to provide a fair design compromise for the applicant while mitigating for the buffer's <42m width by increase foraging opportunities for bats.

> The development envelope has been pulled back from the southern boundary to create a 5m dark commuting corridor and 10m dark foraging corridor and hedge and tree planting to southern boundary proposed. These amendments are accepted though a wider foraging corridor with a better quality of habitat then modified grassland in moderate condition is still encouraged.
>
> Lighting buffer zones have not been provided as part of the proposal. While some improvements have been made to reduce potential light spill along the central section of the boundary, concerns remain regarding lighting impacts from private garden

areas to the east and west. Both issues can be effectively addressed through appropriate site layout and design measures within the development envelope at the reserved matters stage. A suitably worded condition will ensure a site-wide lighting scheme follows the industry standard ILP guidelines *'Guidance Note GN/08/23: Bats and Artificial Lighting at Night*'.

Peterborough City Council Comments
Comments from Peterborough City Council imply the southern boundary contains a ditch. This could be a dry or wet ditch. Clarification is required, and if confirmed:

- PCC comments requiring a 7m buffer from the top of ditch bank will support Ecology and Urban Design requests for a southern boundary redesign.
- The watercourse may need to be added to the metric and map. However, if the ditch does not meet the UKHab definition of a watercourse, any linear habitat along its length will require amendment to the equivalent 'associated with ditch' habitat type.

Clarification provided. No ditch present.

DLL
As the site will be entered into Natural England's District Level Licence (DLL) scheme, a copy of the Impact Assessment Conservation Payment Certificate is required prior to determination.

Submitted and acceptable.

Wintering Birds Report:
Paragraph 6.8 recommended scrub planting mix should be amended to remove gorse (*Ulex europaeus*). It is unlikely that Ulex europaeus was a natural component of the Bedfordshire and Cambridgeshire Claylands prior to human intervention as it prefers acidic, well-drained soils, often found in heathlands and sandy areas. It could be replaced by a combination of the following: Dogwood (*Cornus sanguinea*), Spindle (*Euonymous europaeus*), Hazel (*Corylus avellana*).

Noted in Ecology response. Details of planting specification can be secured at the reserve matters stage.

Clearance of Northern Grass and Scrub Parcel

Concerns are raised regarding the clearance of habitats in the northern parcel. The wholesale removal of existing habitats to be replace with similar if not identical habitats is not acceptable and does not comply with the mitigation hierarchy by failing to avoid harm in the first instance. Suitable alternatives that retain as much of the existing habitat as possible must be explored.

Amendments submitted and accepted. 0.86ha of Other neutral grassland now to be retained and enhanced.

Reptile Refuge

A reptile refuge area needs to be created and retained for the duration of the construction within the northern grass and scrub parcel to provide suitable onsite habitat for the existing

reptile population until the new proposed grassland establishes. The area should include artificial hibernacula, brash/log piles.

Noted in Ecology response. Details of artificial hibernacula, brash/log piles can be secured at the reserve matters stage.

Recreational Access

Recreational access to the proposed habitats must be limited in some areas, preferably along the length of the western/woodland boundary, to ensure impacts from recreational activity and dog walking do not inhibit the proposals capacity to provide adequate mitigation for reptiles and breeding and wintering birds.

Noted in Ecology response. Details of path locations can be secured at the reserve matters stage.

Veteran Trees in Adjacent Woodland

The adjacent woodland contains several veteran trees identified to be of sufficient age, condition, and quality to be classified as veteran or ancient under the NPPF definition. "*193. 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 reasons70 and a suitable compensation strategy exists; …"* While outside the red line boundary, the development still poses a risk of deterioration to the veteran trees (an irreplaceable habitat) through increased public access causing root-zone trampling, soil compaction, fire and vandalism (evidence of fire within in T14 below). The ditch alone will not provide sufficient impediment to residents and members of the public accessing the woodland so fencing should be provided along the western boundary to reduce public access. Full-height, stock-proof boundary fencing is recommended as can be secured by condition or at the reserve matters stage.

Ecological Enhancements

Details of the ecological enhancements, compensations and recommendations contained within the Habitat and Protected Species Suitability Report, Bat Report, Reptile Report, Breeding and Wintering Bird Reports can be secured at the reserve matters stage.

Conditions

A Precaution Working Method to safeguard protected and priority species potentially present on-site should be followed during construction and secured with the following condition:

Condition: No development, including any vegetation clearance, demolition, ground works, site preparation, access creation or storage of materials, shall commence until a Precautionary Working Method (PWM) has been submitted to and approved in writing by the Local Planning Authority (LPA). The PWM shall be prepared by a suitably qualified ecologist and shall include, as a minimum the measures outlined in paragraph 6.3.4 of the Ecological Impact Assessment (Author) received by the LPA on [date] and the following:

1) Updated site check (recent ecological walkover) to confirm the current status of habitats and the potential presence of protected and priority species (including, as relevant to the

site: nesting birds, bats, badger, hedgehog, reptiles, amphibians including great crested newt, and priority species).

2) Risk assessment and method statements setting out precautionary measures to avoid harm, including (as appropriate):
   a) Timing of works to avoid sensitive periods.
   b) Staged vegetation clearance and ecologist-supervised destructive searches of suitable refuges.
   c) Measures to safeguard terrestrial fauna.
   d) Protection of retained habitats/features, including protective fencing and buffer zones to hedgerows, trees (minimum 15xdbh for ancient and veteran trees) and water features, and measures to prevent light spill onto such features during construction.
   e) Soft-strip/hand demolition of features with potential to support roosting bats and protocol for opening up cavities under ecological supervision.
3) Roles, responsibilities and communication, toolbox talks/inductions for site personnel, and attendance/inspection triggers.
4) Stop-works/contingency protocol, requiring immediate cessation of relevant works if any protected species or previously unrecorded potential roost/sett/hibernaculum is found, securing the area, and seeking advice from the ecologist. Where licensable works are required, no works shall recommence until appropriate Natural England licences/consents are in place and the LPA has been notified.
5) Scaled plans and method drawings showing working areas, access routes, exclusion/protection zones and any temporary lighting arrangements for the construction phase.

The development shall be carried out and all construction activities operated only in accordance with the approved PWM, which shall be implemented in full for the duration of the construction phase (including site set-up and enabling works). Any variation shall be submitted to and approved in writing by the LPA prior to implementation.

Reason: To safeguard protected species (including those protected under the Wildlife and Countryside Act 1981 (as amended), the Conservation of Habitats and Species Regulations 2017 (as amended), and the Protection of Badgers Act 1992) and to protect priority species and habitats in accordance with Policy LP30 of the Huntingdonshire Local Plan to 2036.

External lighting scheme for dark bat corridor be provided as part of any application for reserved matters.

No development (including site clearance, demolition, or ground works) shall take place until a ‘lighting design strategy for biodiversity’ has been submitted to and approved in writing by the local planning authority. The strategy shall:

1) identify those areas/features on site that are and will be sensitive for bats and that are likely to cause disturbance in or around their breeding sites, resting places, and proposed bat boxes or along important commuting routes used to access key areas of their territory, for example, for foraging; and
2) show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places. The lighting scheme will adhere to guidelines from the Bat Conservation Trust and ILP (Institute of Lighting Professionals) – "Guidance Note 08/23: Bats and Artificial Lighting at Night": Section 4.29, Appropriate luminaire specifications. The scheme shall include but not be limited to the following:
   a) Lighting position.
   b) Luminaire source type (e.g., LED, fluorescent etc.).
   c) Lighting colour (Kelvin).

d) Lighting wavelength.
e) Lighting direction and height.
f) Baffles, hood and louvres if used.
g) Timer length for security lights on motions sensors.
h) Isolux contour map showing contours down to 0.2LUX.

3) demonstrate how potential lighting impacts arising from private garden areas will be avoided through appropriate site layout and plot design within the development envelope, by locating and orienting private dwellings and gardens to avoid light spill toward identified dark corridors/ecological buffers, maintaining any unlit buffer to retained hedgerows, treelines, watercourses and commuting routes.

All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.