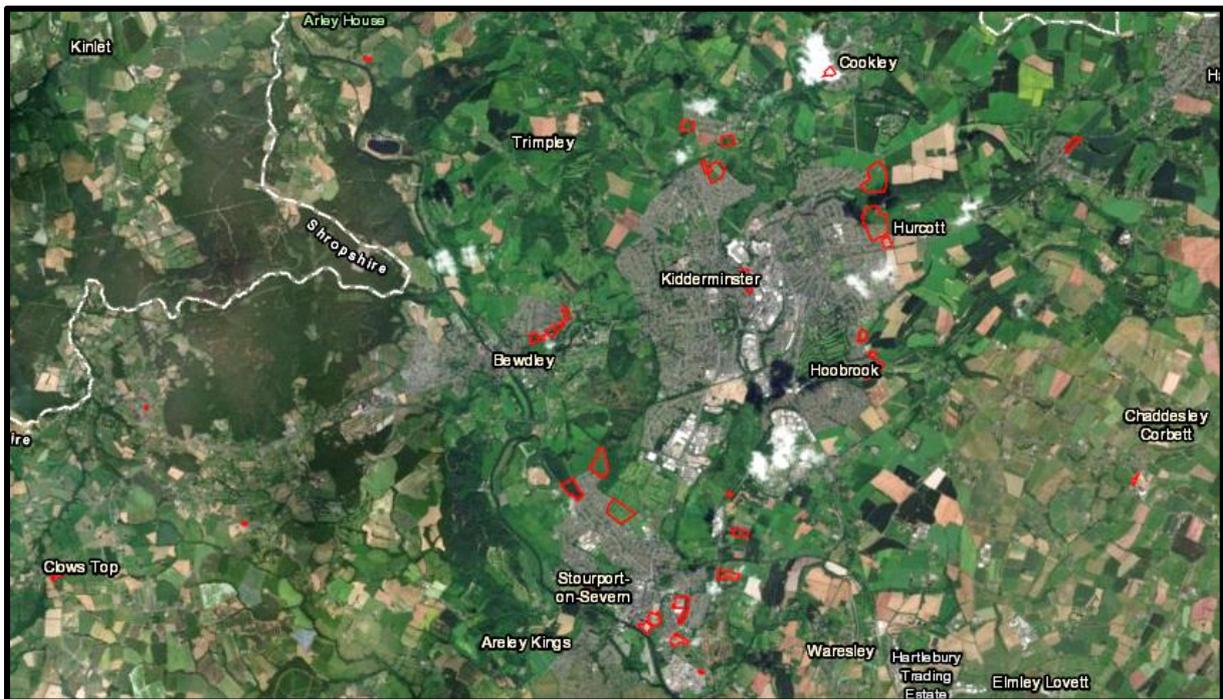


Addendum (2) to
Preliminary Ecological Appraisal of potentially
ecologically sensitive sites on WFDC's list of sites
for allocation in the 2018 Local Plan

October 2018



*Sites in this addendum: BR/RO/4/6 Adjacent Tolland Bungalow
MI/10 Four Acres Caravan Park - ADR*



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1 Introduction

The Preliminary Ecological Appraisal (PEA) reports presented here are an addendum to the main report issued on 15th August 2018: '*Preliminary Ecological Appraisal of potentially ecologically sensitive sites on WFDC's list of sites for allocation in the 2018 Local Plan*'.

This addendum (2) covers two further sites:

Area	Site reference and location	Size (ha)	Key reason for ecological assessment prior to allocation <i>(* Notes on sites awaiting PEA or already completed)</i>
Rural villages	BR/RO/4/6 Tolland Bungalow	0.18	Proximity to Wyre Forest SSSI and possible species-rich grassland.
Stourport	MI/10 Four Acres – ADR	2.94	To inform appropriate buffering for Hartlebury Common & Hilditch Coppice SSSI and acceptable site density. <i>* Currently no permission to access site due to current use as a caravan site. Site use is unlikely to change in near future, however ecological assessment is considered essential prior to allocation in the WFDC local plan.</i>

The methodology remains the same as described in the main report.

Two further sites remain to be assessed prior to allocation. Results for these sites will be presented as a third addendum if access is permitted and the site visits are completed:

- AKR/2 Cheapside
- AKR/20 Carpets of Worth

1.1.1 Limitations

In addition to the limitations detailed in section 2.4 of the original report, the species of flora recorded for the surveys presented here may have been limited because they were carried out beyond the usual growing season. However habitat types could be identified and species indicative of the valuable habitats were found, therefore the October timing of the surveys is not considered to be a significant limitation.

2 Summary of conclusions and recommendations

Detailed results for both sites are given in the appendices, please refer to sections 4.1-4.12 in the main report for summaries of the legal statuses of the protected and notable animal species listed.

Area	Site reference and location	Size (ha)	Summary of ecological recommendations that impact sites' suitability for development and developable space
Rural villages	BR/RO/4/6 Adjacent Tolland Bungalow	0.18	The presence and positions of ancient fruit trees and tree lines on two boundaries restricts developable area and layout. Due to the nature and configuration of the ecological constraints we caution that WFDC consider removing this site from allocation in its entirety.
Stourport	MI/10 Four Acres – ADR	2.94	Development of this site could represent a significant improvement on its current use, however sensitive development adjacent to SSSI requires a large buffer zone ($\geq 40\text{m}$ on three sides), representing a loss of more than 70% of developable area.

3 Appendix – PEA report addendum (2) sites

BR/RO/4/6 Adjacent Tolland Bungalow
MI/10 Four Acres Caravan Park - ADR

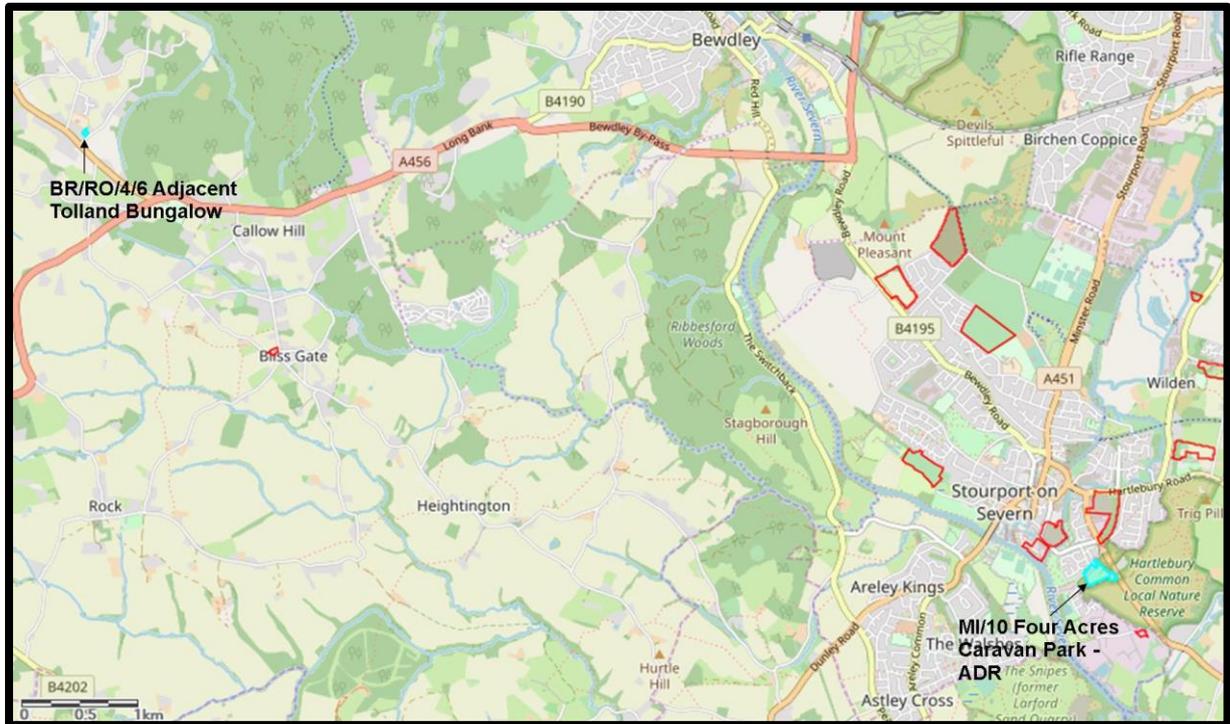


Figure 1. Overview of sites, highlighting sites covered in this second addendum to the main report

3.1.1 BR/RO/4/6 Adjacent Tolland Bungalow

See habitat map in Figure 2. Site visit 05/10/2018.

This site is a former orchard, between two detached houses on a small lane (Plough Lane) in Far Forest. It is a rural site, approximately 3.8km from the western edge of Bewdley.

In the local area there are numerous records of the noble chafer beetle, adders, and hedgehogs, along with many plant species that would be less likely to be affected by a development here (Figure 3). The site is mostly too overgrown for adders to bask, but the immediate neighbours saw an adder in their garden less than five years ago and the site has potential to offer cover and hibernation opportunities for adders in tandem with the neighbouring grasslands. Slightly further afield there is a record of dormice less than 1km away to the west and numerous records within 2km from north-north-west to south-east.

Field signs indicated that the site is used by badgers and deer. However there is no evidence that badgers inhabit the site, they are likely to pass through while foraging.

The Wyre Forest SSSI is less than 250m to the east (Figure 4), and while this site is outside of the SSSI, there is almost continuous forest habitat between the two, with mature tree lines along Plough Lane joining the site to the edge of the forest.

Features of biodiversity significance

- Cherry trees showing some features of ancient trees¹ (e.g. hollowing trunk, cavities and very rough and creviced bark), with a high likelihood of supporting the noble chafer beetle and potential to host roosting bats.
- Mature trees on the southern (road-side) and eastern boundaries are important corridors at a landscape level.

Recommendations

- The ancient fruit trees must be retained (NPPF 18 paragraph 175c: *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...*). The locations of the trees would make it very difficult to develop this site without removing or at least causing their deterioration. Natural England standing advice² on ancient trees recommends:

¹ Ancient = beyond maturity and is old, or aged in comparison to other trees of the same species (Woodland Trust Ancient Tree Forum [n.d.] *Ancient Tree Guide No.4*. Available at: www.ancienttreeforum.co.uk/wp-content/uploads/2015/02/ancient-tree-guide-4-definitions.pdf, accessed on 8th October 2018).

² Forestry Commission and Natural England (2018) *Guidance: Ancient woodland and veteran trees: protecting them from development*. Available at: www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences#veteran-trees, accessed on 8th October 2018.

- *leaving an appropriate buffer zone of semi-natural habitat between the development and the ancient woodland or tree (depending on the size of the development, a minimum buffer should be at least 15 metres)*
- *leaving a buffer zone at least 15 times larger than the diameter of a veteran tree or 5m from the edge of its canopy, if that's greater*
- Trees on the eastern and southern boundaries are important features at a landscape level, these must be retained and the root zones protected from direct and indirect impacts of development. Accommodating the fruit trees and buffering the boundary tree lines reduces an already small site by more than 50%, and restricts how the remaining space can be used.
- Younger fruit trees and standing dead wood on site should be retained where possible, or transplanted if unavoidable.
- If the site is allocated it is advised that full surveys for reptiles, bats, dormice and invertebrates would be required to inform site design and the planning decision, with the reptile survey needing to extend beyond the site boundaries. However due to the significant ecological constraints it is recommended that this site is removed from the allocation.

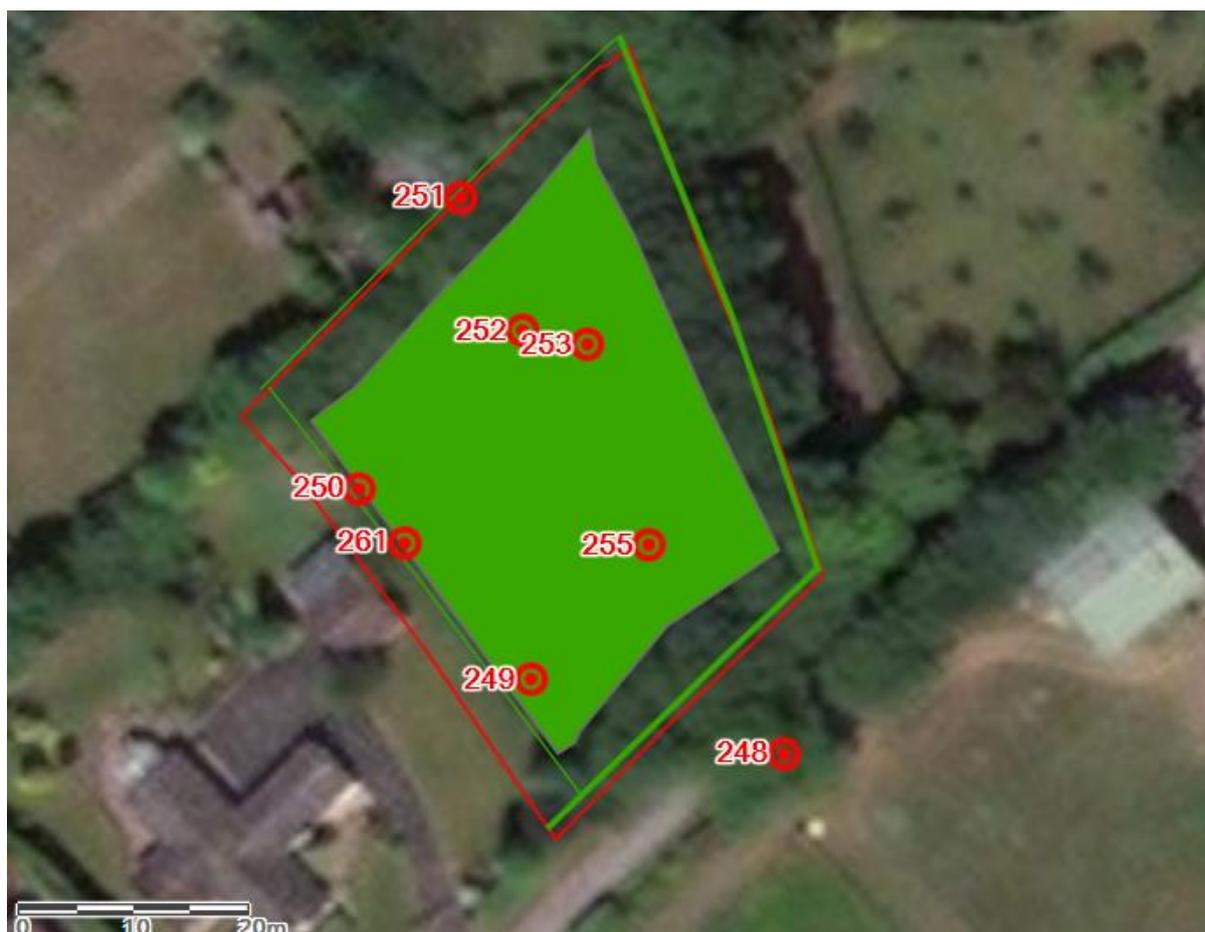


Figure 2. BR/RO/4/6 Adjacent Tolland Bungalow, created 05/10/2018

Table 1. Description of each habitat type identified at BR/RO/4/6 Adjacent Tolland Bungalow

IHS Habitat category code and map symbol <i>Formation / Matrix / Management</i>	Comment
LF1 (Hedges) 	<p>A tightly clipped conifer (Leyland Cypress) hedge along the south-west site boundary, separating it from Tolland Bungalow.</p> 
LF1 (Hedges) 	<p>The north-west site boundary has a panel fence separating it from the parcel of land to north (previously in allocation, but not identified for ecological survey). This hedgerow comprises mostly spindly <i>Prunus</i> sp., with the understory a continuation of the scrub covering the centre of the site.</p> 
LF21 (Line of Trees) 	<p>The roadside line of trees comprises ash, cherry, hawthorn, holly and sycamore, with bramble throughout. The larger sycamores have previously been coppiced, but not recently. It forms a fairly thick boundary but with gaps allowing pedestrian access to site. There is an absence of crevices and cavities in these trees, and therefore no or negligible potential for roosting bats. The ground flora includes cleavers, common nettle, dandelion, upright hedge parsley, white dead nettle and wood avens.</p> 

IHS Habitat category code and map symbol <i>Formation / Matrix / Management</i>	Comment
	
<p>LF21 (Line of Trees)</p> 	<p>On the east side of the site there is a dense line of tall, multi-stemmed sycamores, with much ivy cover and holly in understory. There is also a large ash tree, and a horse chestnut in the corner. These trees have potential to host roosting bats in cavities and under ivy stems, but were not possible to inspect closely due to dense foliage.</p> 
<p>SC0 (Scrub)</p> 	<p>The main area of the site is overgrown and scrubby; it was formerly an orchard. The vegetation includes bracken, bramble, broad leaved dock, buddleia, chickweed, common nettle, creeping thistle, foxglove, garlic mustard, gorse, hedgerow cranesbill, red campion, tansy, white dead nettle and wood avens, with frequent saplings of ash, hazel and holly. There is dense bramble and gorse in centre of site.</p> 

Table 2. Target-noted features of BR/RO/4/6 Adjacent Tolland Bungalow

Target note number	Description
248	<p>A large ash tree on the opposite side of the lane. It has high potential to host roosting bats in branch wounds and dead wood in canopy and may be vulnerable to disturbance from nearby development. Retention and protection from lighting is advocated.</p> 
249	<p>An ancient cherry tree with split and peeling bark, some dead branches, and a large cavity beginning to form on the main trunk. This tree is irreplaceable and as such should only be lost in 'wholly exceptional' circumstances.</p> 
261	<p>An ancient cherry tree with a long split in the bark and multiple cavities and crevices provide high potential for roosting bats, noble chafer beetles and breeding birds.</p> 

Target note number	Description
	
250	<p>A smaller cherry tree with significant ivy cover. Dead wood and thick ivy stems provide moderate for roosting bats; no cavities are visible, but decaying parts may also host grubs of the noble chafer beetle.</p> 
251	<p>Tree stump on the north-west site boundary and dead wood (a trunk) lying nearby, species unknown. Both are rotten and split, providing excellent saproxylic invertebrate habitat, potentially for the noble chafer. Must be retained, ideally in current position.</p> 

Target note number	Description
252	<p>Mature cherry tree with some dead wood and flaky bark. No cavities seen, but it has potential to host saproxylic invertebrates.</p> 
253	<p>Rabbit warren – a large mound, covered in nettles and cleavers.</p> 
255	<p>Dead cherry, standing deadwood. Noble chafers may be present in this tree. Although already dead, it is irreplaceable habitat that requires retention and protection – loss should only be considered in 'wholly exceptional' circumstances.</p> 

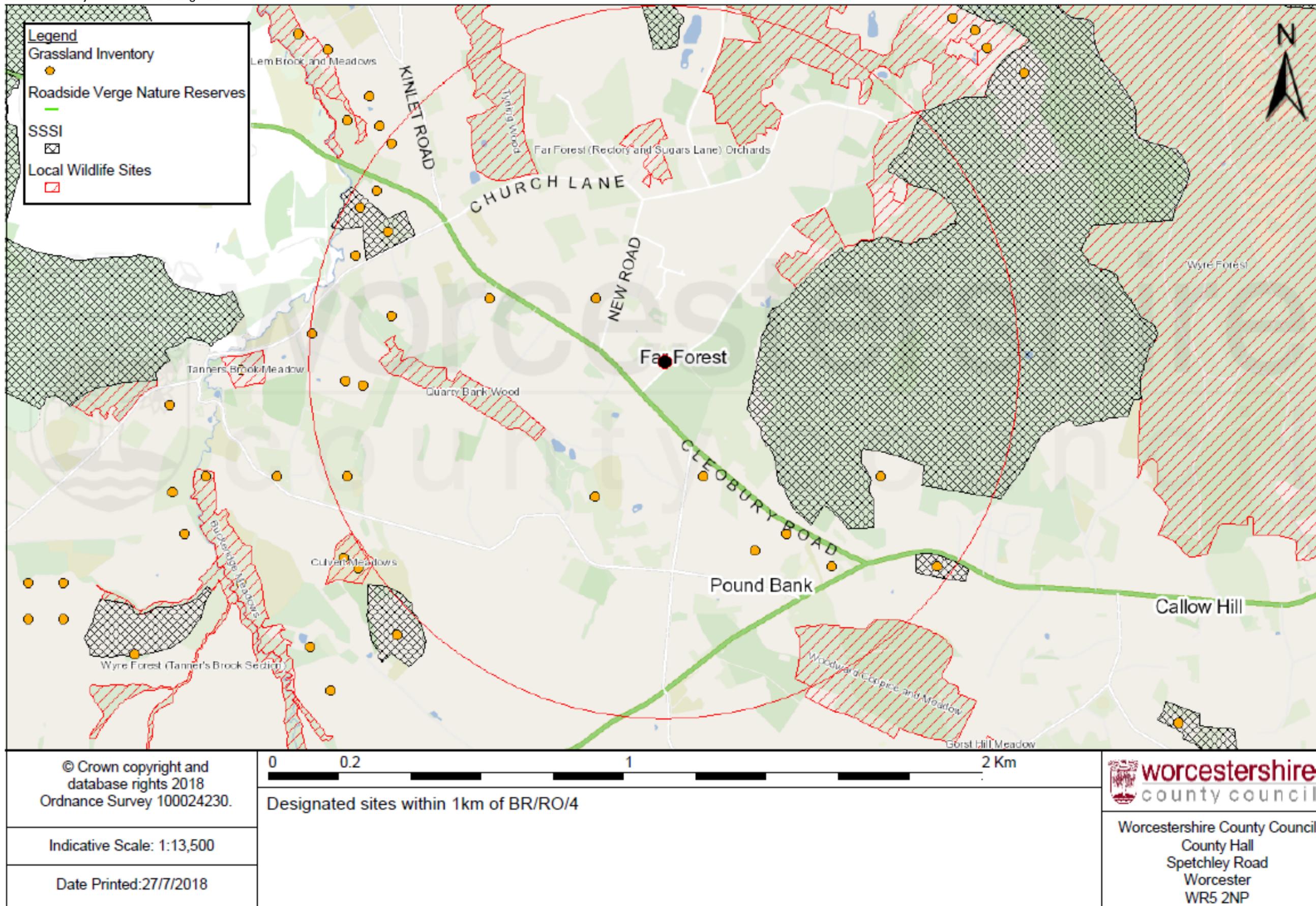


Figure 4. Designated sites within 1km of the centre of BR/RO/4/6 Adjacent Tolland Bungalow

3.1.2 MI/10 Four Acres Caravan Park - ADR

See habitat map in Figure 5. Site visit 05/10/2018

This site was assessed only from outside the boundary due to access restrictions, so the habitat map produced only shows habitats on and near the boundary. It was not possible to see far into the site from the perimeter, although some conifer trees were visible and aerial images show that caravans and tarmac roads cover most of the surface area. The site is bordered on three sides by Hartlebury Common SSSI (Figure 7), which is a rare heathland habitat, characterised by vegetation that specialises in acidic soils. As of 2005 less than 0.18% of Worcestershire was found to contain acid grassland by area, yet Worcestershire is thought to hold up to 20% of the country's overall area of lowland botanically rich grasslands, including acid grassland, making any resource both nationally important and a locally significant asset. SSSIs are statutorily protected sites, which statutory bodies have a duty to conserve and enhance – Natural England must be consulted if activities that may affect an SSSI might be permitted (e.g. development).

Houses facing the road on the north-west boundary were more visible than caravans inside the site, but were not examined in detail as permission had not been sought from tenants; they appear to be well maintained and without loose tiles or mortar.

Hartlebury Common is a highly sensitive receptor which is susceptible to direct and indirect disturbance and damage. The density of the human population currently living on the caravan site undoubtedly already has an impact on the heathland. A more permanent development would present an opportunity to eliminate that impact and to allow a net gain for biodiversity, however it would require very careful planning and sensitive design.

There are many records of notable and protected species near to this site (Figure 6), because the SSSI is well studied and it is a large expanse of natural habitat. The heathland plant species must be safeguarded from additional pressures associated with greater footfall of humans and domestic pets. Animal species recorded in the area include a number of rare invertebrate species, common lizard, cuckoos, badgers, hedgehogs, pipistrelle bats and polecats.

Features of biodiversity significance

- Adjacent SSSI acid heathland with flora and fauna sensitive to disturbance.
- Large oak trees on / near perimeter.

Recommendations

- The site might be improved by low density development focused on the north-west boundary and the centre of the site, allowing for extensive buffering (an ecologically functional buffer of appropriate size, ideally no less than 40m) for the adjacent heathland, reducing or eliminating the impact on the SSSI. Consideration of how surface water is managed is important to prevent damage to the hydrology (and consequently habitats) on the Common.

- Funding for sensitive management and monitoring of the buffer zone should be secured in perpetuity.
- There should not be direct access to the Common from the site, to minimise the impact of future residents on this sensitive habitat. Biodiversity enhancements should include restoration of heathland within the site, perhaps as a GI feature to draw pedestrians into the site and away from the Common.
- The Leyland Cypress trees on the site's boundaries and internal to the site should be removed, outside of the bird nesting season.
- Target noted oak trees would ideally be retained and protected, although saplings and scrub should be managed to prevent loss of / damage to the heathland.

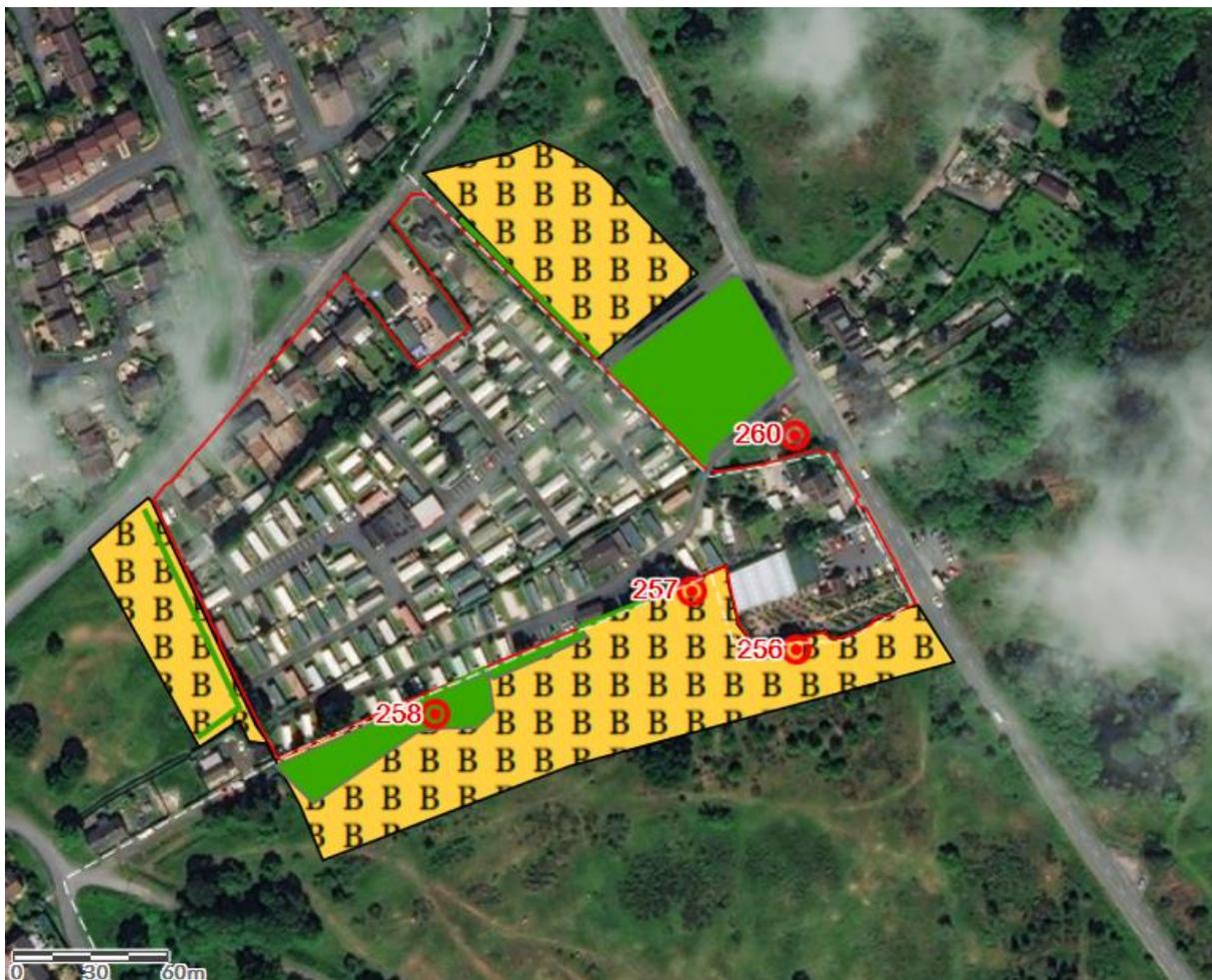


Figure 5. MI/10 Four Acres Caravan Park - ADR, habitat map, created 05/10/2018

Table 3. Description of each habitat type identified at MI/10 Four Acres Caravan Park - ADR

IHS Habitat category code and map symbol <i>Formation / Matrix / Management</i>	Comment
<p>SC0 (Scrub)</p> 	<p>The perimeter of Cook's Garden Centre to the east of site is fenced with metal panels and razor wire. A mostly wooden panelled fence continues around the outside of the caravan site. Much of the southern boundary is dominated by scrub, comprising bracken, bramble, broad leaved willowherb, broom, crab apple, Himalayan balsam, ivy, oak trees and saplings, silver birch and snowberry. European hornet and ivy bees were seen on the flowering ivy.</p> 
<p>HE0 Heathland (Dwarf Shrub Heath)</p> 	<p>After the scrub on the site boundary, vegetation becomes more sparse and typical of managed heathland. The flora includes common toadflax, dove's foot geranium, fat hen, gorse, heath bedstraw*, hedge bindweed, mallow, ragwort, red fescue*, ribwort plantain, sheep's sorrel*, white dead nettle and yarrow.</p> <p style="text-align: right;"><i>* Heathland specialist species</i></p> 
<p>LF21 (Line of Trees)</p>	<p>Leyland Cypress trees form parts of the caravan park boundary, in places these are very tall and dense with bramble thickets at the bottom. They have little value to biodiversity, except to screen light and offer</p>

IHS Habitat category code and map symbol <i>Formation / Matrix / Management</i>	Comment
	<p>opportunities for nesting birds and foraging bats.</p> 
<p>LF27 (Transport Corridors)</p> 	<p>There are two driveways entering the caravan site on the eastern side. The southern driveway has a parking area close to Worcester Road (A4025), in a clearing on the edge of the woodland.</p> 
<p>WB3Z (Other Broadleaved Woodland)</p> 	<p>Woodland comprising mostly aspen between the site driveways on the east side. There is some standing deadwood and lots of ivy cover, providing high potential for the presence of bat roosts under thick ivy stems and in hollows forming within some tree trunks. Other flora here includes apple trees and small oaks, bracken, bramble, hawthorn and red dead nettle.</p> 

IHS Habitat category code and map symbol <i>Formation / Matrix / Management</i>	Comment
	

Table 4. Target-noted features of MI/10 Four Acres Caravan Park - ADR

Target note number	Description
256	<p>A Large oak tree on the garden centre boundary. It has high potential to host roosting bats in cracks and crevices. There are other large oaks slightly further from boundary, all worthy of protection from indirect impacts of development.</p>
	
257	<p>Two large oaks close to the caravan park boundary. These trees have high potential to host roosting bats.</p>
	
258	<p>Large oak close to boundary, with high potential to host roosting bats.</p>

Target note number	Description
	
260	<p data-bbox="331 734 1412 801">Scrub including bamboo and hops adjacent to the southern site driveway. Action should be taken to remove the bamboo as it can become invasive and poses a risk to the SSSI.</p> 

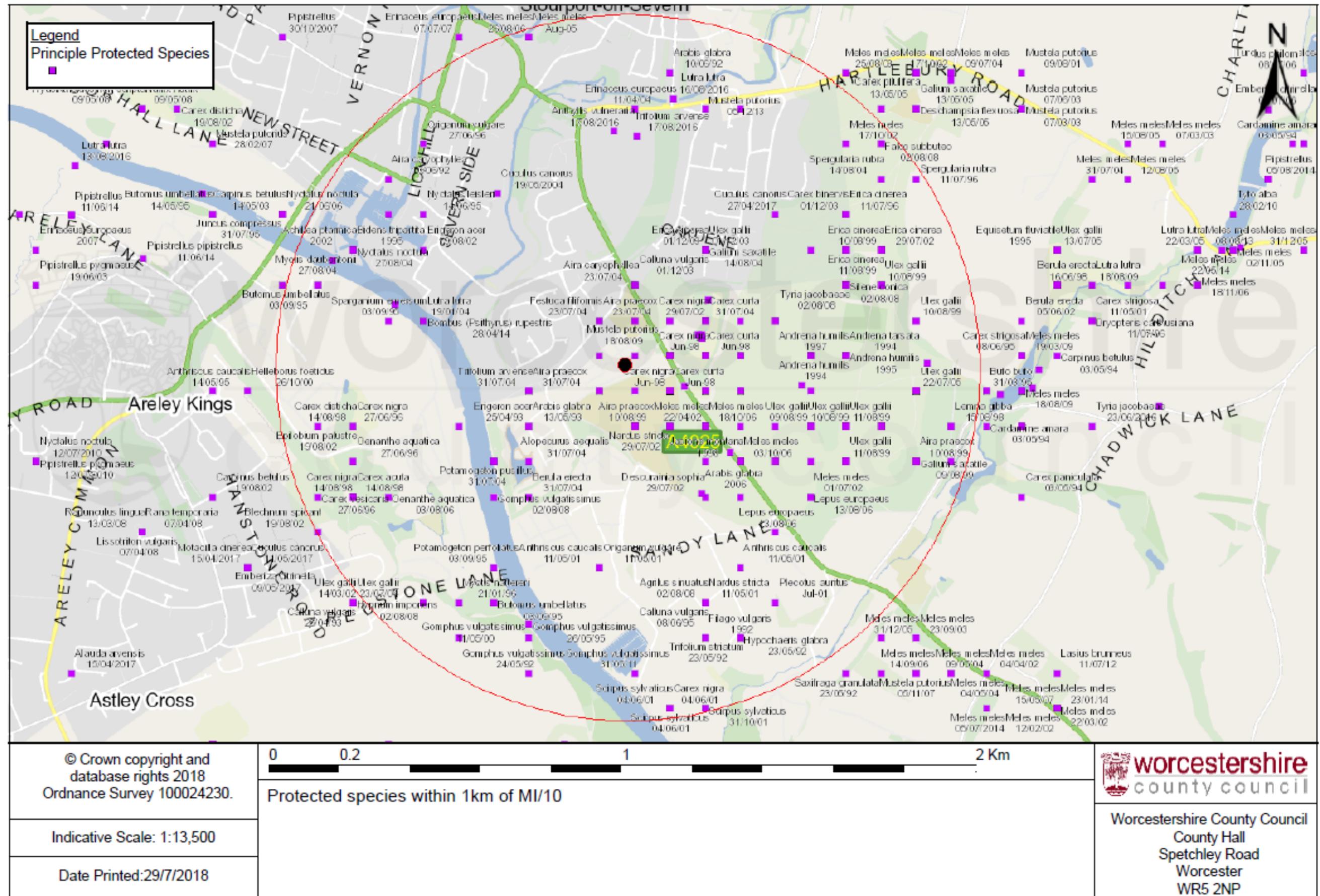


Figure 6. Protected species records within 1km of the centre of MI/10 Four Acres Caravan Park - ADR

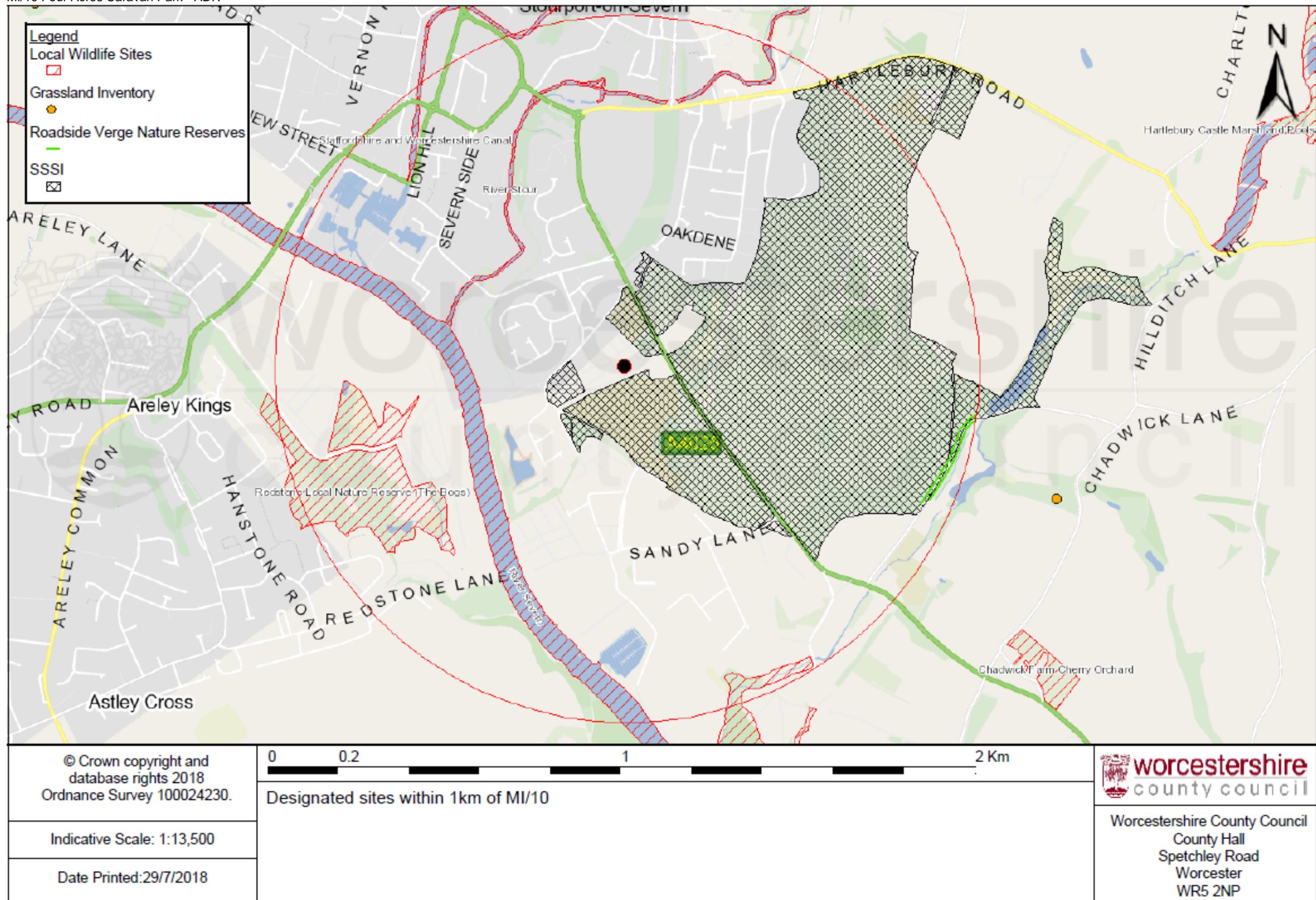


Figure 7. Designated sites within 1km of the centre of MI/10 Four Acres Caravan Park - ADR