# HELAA sites Wildlife Screening – Brixham

Please note that these site assessments have been undertaken via a desk study with the aim of identifying high level ecological impacts and mitigation requirements. For all colours (as listed below), all ecological mitigation requirements will need to be put in place for applications to be acceptable (for example, if a site is coloured amber, all ecological mitigation will be required to be provided, not just those for Greater Horseshoe bats). For any sites where there is a question mark of whether suitable mitigation can be achieved, then this will be coloured red.

*Green = No significant wildlife issues identified at this stage or site has existing planning permission. We are confident that impacts and mitigation requirements can be identified at this stage and are achievable e.g. recreation impact payments. Can be allocated.*

*Amber = Potential impacts to Greater Horseshoe bats associated with the South Hams SAC within a sustenance zone either alone or in combination with other allocated sites. Can be allocated as long as developer can put the required mitigation in place to avoid Adverse Effects on the Integrity of the European site.*

*Purple = Potential impacts to Greater Horseshoe bats associated with the South Hams SAC within the landscape connectivity zone either alone or in combination with other allocated sites. Can be allocated as long as developer can put the required mitigation in place to avoid Adverse Effects on the Integrity of the European site.*

*Grey = Potential water quality impacts on the Lyme Bay to Torbay marine SAC either alone or in combination with other allocated sites. Can be allocated as long as developer can put the required mitigation in place to avoid Adverse Effects on the Integrity of the European site.*

*Yellow = Site visit required prior to allocation to clarify the wildlife value of the site and whether there are any potential showstoppers.*

*Red = Likely policy/legal ecological showstoppers*

A number of the HELAA sites currently identified for possible allocation have the potential to include a large amount of foraging habitat withing the South Hams SAC GHB sustenance zone. Provided that foraging habitat can be provided in the right location depending on use, then in combination impacts of developing all these sites can be avoided. However, this will need to be assessed as part of the Local Plan.

Recreational impacts on the Lyme Bay to Torbay SAC have not been covered within these site assessments. This is due to the advice received by Natural England, in which they state there is no evidence currently available to conclude that recreational activities are damaging the SAC features, or that recreational activities are attributable to the housing numbers identified in the Local Plan. They state that individual planning applications that have a clear link to increased recreational use of the coast will need to be subject to project-level HRA, and that a bespoke package of measures will need to be secured to address the specific impacts of the proposed project – currently this does not extend to housing application. We would appreciate an opportunity to discuss this further, as we do not believe that this explanation has been fully explained.

Impacts to the Lyme Bay and Torbay SAC relating to increased pressures on sewage infrastructure have also not been assessed within these site assessments. Torbay Council are currently undertaking a sewer capacity assessment which may well alter impacts onto the marine SAC. Again, we would appreciate the opportunity to discuss further, once the sewer capacity assessment has been completed.

| **Local Plan Ref.** | **HELAA Ref.** | **Housing/Employment site** | **Estimated Number of Dwellings** | **Specialist comments (TW)** *Known or potential wildlife interest of the site and surroundings and potential direct and indirect impacts on or off site***.** | **Potential mitigation required (TW)** *(avoidance, compensation, mitigation and enhancement/BNG) + any showstoppers.* | **Potential for impacts on European Site** | **Site visit required to clarify wildlife value prior to allocation.** |
| --- | --- | --- | --- | --- | --- | --- | --- |
| H2BCG01 | 21B001 | Gliddon Ford Filling Station, Dartmouth Road, Churston Ferrers | 10 | **Designated sites**.  South Hams SAC - Site is within the greater horseshoe bat (GHB) sustenance zone. Site is deemed sub-optimal for GHBs given the surrounding land use and existing levels of artificial illuminance. The site is existing hardstanding with residential/employment development present to the north and east. The A3022 forms the eastern border of the site and is subject to high levels of artificial illuminance. The west of the site is bordered by a hedgerow and a playing field. It is deemed there is no connection between the site and other areas of suitable GHB habitat.  No likely significant effect (LSE) on the South Hams SAC alone or in combination with regards to GHBs.  Site is within the 5km zone of influence with regards to recreational impacts upon the South Hams SAC.  Lyme Bay and Torbay SAC – No hydrological links between the site and this SAC.    **Habitats**. Site is an existing plot of hardstanding which is bordered by trees/hedgerow to the west.  **Species** – Surrounding hedges/trees could support protected and priority species such as nesting birds. Site is within a cirl bunting consultation zone – habitat onsite appears unsuitable for the species from aerial photographs  No likely show-stoppers.  Impacts could include direct loss of habitat | **Headline mitigation requirements**  **Designated Sites** – No GHB specific mitigation required for this site.  Recreational payments will be required via a s.106, to ensure recreational impacts on the SAC are mitigated.  **Habitats** – protect and strengthen hedgerow border the west.  **Species** – protect and enhance important trees. West of the site (i.e. playing field) is currently dark so artificial illuminance of this area should be avoided for bats.  BNG requirements to be met on/off site. | **Yes – recreational payments required** | **No** |
| H2BCG03\* | 21B002 | Land South of White Rock (Inglewood)  Site already in the Masterplan/or permitted (P/2017/1133 - Outline application for residential led development of up to 373 dwellings (C3) together with the means of vehicular and pedestrian/cycle access together with the principle of a public house (A3/A4 use), primary school with nursery (D1), internal access roads and the provision of public open space (formal and informal) and strategic mitigation. The proposal includes amendments to Brixham Road, Long Road junction and Windy Corner junction. Details of access to be determined with all other matters reserved) | 373 | **Designated sites**.  South Hams SAC - Site is within the Sustenance Zone for GHBs associated with the Berry Head roost. The wider site already has planning consent (P/2017/1133) for dwellings and employment - the planning application was accompanied by an Ecological Report informed by bat activity surveys. The results of these surveys showed irregular use of the site by only a few GHBs, and these were thought to be individuals mainly commuting across the site and occasionally foraging along hedgerows. Site specific HRA already carried out and approved with NE for application P/2017/1133.  Lyme Bay and Torbay SAC – No hydrological links between the site and this SAC.  **Habitats**. Site is permanent pasture bordered by mature hedgerows, with small woodland blocks present to the south of the site.  **Species** – Surrounding hedgerows could support protected and priority species such as dormice, badgers, reptiles, hedgehogs and act as bat flight lines/ foraging habitat. Site is within a Cirl Bunting consultation zone and outline application confirmed breeding zones for the species were to be impacted.  Impacts include direct loss of habitat and urban impacts (lighting, noise, cat predation, dogs etc) on habitats and species. | **Headline mitigation requirements**  Designated Sites – Creation of dark corridors approved to maintain connectivity for GHBs across the site. Offsite hedgerow planting/enhancement and GHB habitat creation was secured in a long-term by a management agreement via the planning application. HRA for application already agreed with Natural England and concluded no Likely Significant Effect on the South Hams SAC  Habitats – protect and enhance hedges, margins, trees.  Species – protect and enhance hedges, trees, dark corridors for bats, badgers etc. Licences required for bats as offences can’t be avoided – if bat roosts are impacted then compensation will be required. Financial contributions for cirl buntings already secured with application P/2017/1133. | **No – Site specific HRA already approved** | **No** |
| H2BCG02 | 21B005 | Archery Field, Dartmouth Rd | 50 | **Designated sites**.  South Hams SAC - Site is within the GHB sustenance zone. GHBs may use the site for commuting and foraging and impacts to GHB commuting and foraging habitat could therefore have an LSE on the South Hams SAC alone. **Appropriate Assessment required.**  Site is within the 5km zone of influence with regards to recreational impacts upon the South Hams SAC.  Lyme Bay and Torbay SAC – No hydrological links between the site and this SAC.  **Habitats**. Site appears to be grazed pasture bordered by the railway line to the north and a playing field present to the east. Hedgerows border the site on all sides, but strongest hedgerow boundary appears to be the south.  The Torbay-Dartmouth Railway line Other Site of Wildlife Interest (OSWI), borders the site to the north. This site is described as Species-rich grassland & an important wildlife corridor by DBRC.  **Species** - Surrounding hedgerows which borders the site could support protected and priority species such as dormice, reptiles, hedgehogs and act as bat flight lines. Hedges may provide bat foraging habitat. Site is situated 250m from a 2016 confirmed Cirl Bunting breeding territory. Habitat could potentially support the species.  No likely show-stoppers identified at this stage.  Impacts could include direct loss of habitat and urban impacts (lighting, noise, cat predation, dogs etc) on habitats and species. | **Headline mitigation requirements**  **Designated Sites**  Greater Horseshoe Bats – In order to avoid an Adverse Effect on the Integrity of the South Hams SAC, mitigation will need to be considered at local plan stage.  Assuming that GHBs are using the site for commuting and foraging, mitigation will include the creation of dark corridors in line with Devon dark corridors guidance document to maintain connectivity for GHBs across the site and wider landscape. Mitigation for loss of foraging habitat within a sustenance zone will be required – either within the redline boundary or directly adjacent to the site offsite. Providing this mitigation is secured, then we can conclude no adverse effect on integrity of the South Hams SAC at the local plan stage.  Recreational payments will be required via a s.106, to ensure recreational impacts on the SAC are mitigated.  **Habitats** – protect and enhance hedges, margins, trees.  **Species** – protect and enhance hedges, trees, dark corridors for bats (as above), dormice, badgers etc. Licences may be required if offences can’t be avoided (i.e. dormice). Cirl Bunting surveys will be required to understand mitigation requirements – offsite compensation or financial contribution may be required.  BNG requirements to be met on/off site. | **Yes – alone and in combination** | **No** |
| H2B01 | 21B026 | Wall Park Extensions (R/O Wall Park Farm, 39 Wall Park Rd)  Part of the site already has permission for three dwellings (P/2019/0594) | 20 | **Designated sites**.  South Hams SAC - Site is within the GHB sustenance zone. Site is deemed sub-optimal for GHBs given the surrounding land use and existing levels of artificial illuminance. The site is bordered to the north, south and east by residential development and by playing fields to the west which has existing floodlighting. It is deemed there is no connection between the site and other areas of suitable GHB habitat.  No likely significant effect (LSE) on the South Hams SAC alone in combination with regards to GHBs.    Site is within the 5km zone of influence with regards to recreational impacts upon the South hams SAC.  Lyme Bay and Torbay SAC – No hydrological links between the site and this SAC.  **Habitats**. Site appears to be modified grassland/amenity grassland bordered by residential development to the north and a playing field present to the west. Small patches of scrub present to the south of the site. Aerial photographs indicate the site is of limited ecological value.  **Species** - Habitats onsite unlikely to support protected and priority species such as dormice, reptiles, hedgehogs given the surrounding residential development. Site is situated within a cirl bunting consultation zone but site not likely to support the species.  No likely show-stoppers identified at this stage. | **Headline mitigation requirements**  **Designated Sites** – No GHB specific mitigation deemed necessary.  Recreational payments will be required via a s.106, to ensure recreational impacts on the SAC are mitigated.  **Habitats** – Limited requirement to protect habitats, given the apparent low ecological value of the site.  **Species** – Potential for landscaping to benefit biodiversity. Unlikely to require specific protected species mitigation.  BNG requirements to be met on/off site. | **Yes – recreational payments required** | **No** |
| H2B06\* | 22B001 | St Mary's/Old Dairy | 15 | **Designated sites**.  South Hams SAC - Site is within the greater horseshoe bat (GHB) sustenance zone. Site is deemed sub-optimal for GHBs given the surrounding land use and existing levels of artificial illuminance. The site is existing hardstanding with residential development present to the north, south and west. St Marys Road forms part of the site and is subject to high levels of artificial illuminance. It is deemed there is no connection between the site and other areas of suitable GHB habitat.  No likely significant effect (LSE) on the South Hams SAC alone or in combination with regards to GHBs.  Site is within the 5km zone of influence with regards to recreational impacts upon the South Hams SAC.  Lyme Bay and Torbay SAC – No hydrological links between the site and this SAC.    **Habitats**. Site is an existing plot of hardstanding which is bordered by a tree line to the north.  **Species** – Surrounding hedges/trees could support protected and priority species such as nesting birds. Site is within a cirl bunting consultation zone – habitat onsite appears unsuitable for the species from aerial photographs. Buildings onsite may have potential to support bat roosts. There are confirmed bat roosts within the buildings present on Upton Manor farm to the east of the site, including a Lesser Horseshoe bat roost.  No likely show-stoppers.  Impacts could include direct loss of habitat | **Headline mitigation requirements**  **Designated Sites** – No GHB specific mitigation required for this site.  Recreational payments will be required via a s.106, to ensure recreational impacts on the SAC are mitigated.  **Habitats** – protect and strengthen tree line to the north.  **Species** – protect and enhance hedges, trees, dark corridors for bats, badgers etc. Licences required for bats as offences can’t be avoided – if bat roosts are impacted then compensation will be required  BNG requirements to be met on/off site. | **Yes – recreational payments required** | **No** |