

APPLICATION NUMBER P0672/25/OUT ADDRESS (FIRST LINE ONLY) Land north of Carisbrook Road CASE OFFICER Emma Hughes	CONSULTEE (NAME/SECTION) Anouska Laramy Principal Ecologist and Countryside Lead DATE 09/04/2026	
Issues Considered Landscape impact (SPD) ☐ Trees ☐ Landscaping ☐ Ecology ☒		
RECOMMENDATION (INSERT 'X' IN RELEVANT BOX)ⁱ ☐ ADDITIONAL INFORMATION REQUIRED (Please re-consult when received) ☐ OBJECTION (Refusal reason below) ☐ NO OBJECTION ☒ NO OBJECTION SUBJECT TO CONDITIONS (see 'Conditions and informatives' below) ☐ PRE-COMMENCEMENT CONDITIONS LIKLEY ☐ NO OBJECTION SUBJECT TO REVISIONS		
SUMMARY * Adequate / Further information required (FIR) / N/A/ conditions		
Ecological Report	Adequate	Trees Identified & RPA's
Local Records Data Search	Adequate	Arboricultural Assessment
Mitigation	Condition	Landscape Assessment
Enhancement /Net Gain	Condition	Landscaping details
Further to your recent enquiry I have reviewed the submitted information and offer the following comments. <u>Proposal</u> Outline application for the erection of up to 180 residential dwellings (including affordable housing) with public open space, landscaping and vehicular access points (all matters reserved except for means of access) <u>Summary</u> - A Habitat Regulations Appropriate Assessment has been undertaken and It is considered that the required conditions outlined below can be relied upon to avoid adverse effects on the integrity of the Wye Valley and Forest of Dean Bat SAC. - Conditions will be required to avoid adverse impacts to protected species please see below. <u>Reports</u> - Ecological Impact Assessment, CSA Environmental, August 2025 - Lighting Strategy, DFL, April 2024 - Shadow Habitat Regulations Assessment, CSA Environmental, August 2025		

- **Biodiversity Net Gain Assessment, CSA Environmental, March 2025**
- **Ecology Briefing Note, CSA Environmental, August 2025**
- **Technical Note – Lighting, DFL, April 2026**

Detailed Comments

The boundary features are of importance to bats and nesting birds, habitat onsite is limited as is intensively managed so is therefore not considered to be of importance to protected and notable species – however boundary hedgerow features are of ecological importance and must be conserved and enhanced.

Horseshoe Bats associated with Wye Valley and Forest of Dean Bat SAC

The site is approximately 485m away from a component of the Wye Valley and Forest of Dean Bat SAC at its nearest boundary. Wigpool Ironstone mine is designated for its hibernating populations of horseshoe bats. Therefore, the site is within an extremely sensitive location and has been subject to extensive surveys. The boundary hedgerows are of importance for commuting horseshoe bats, particularly hedgerows to the north.

A Land Use parameters plan has been submitted which is welcomed and significant buffers and planting have been proposed at the boundaries. It is extremely important that these buffer zones as proposed are free from development and that light spill in these areas remains either at 0.2 lux on the horizontal plane and 0.4 lux on the vertical plane or no higher than baseline levels. The full design will need to accommodate for this and ensure that light spill from internal and external lighting does not exceed this. The proposed planting and retained hedgerows will also need to be as shown on the land use parameters plan within the plans at reserved matters stage.

Monitoring will be required on the surrounding features due to the close proximity of the SAC and this must include remediation measures – this may be conditioned.
A Habitat Regulations Appropriate Assessment has been undertaken and It is considered that the required conditions outlined below can be relied upon to avoid adverse effects on the integrity of the Wye Valley and Forest of Dean Bat SAC.

Dormice

The ecologist has provided further evidence, and we have also reviewed photographs and street view images of the scrub and hedgerow, the scrub habitat to be removed is adjacent to poor hedgerow and does not appear suitable for dormice, therefore it is reasonably likely that dormice are absent. Precautionary working measures have been provided which are suitable in the unlikely event that dormice are found. The precautionary working measures include pre-commencement checks for dormice, phased clearance and works under supervision from a suitably qualified ecologist, if dormice are found works must stop immediately and a mitigation licence from Natural England must be obtained.

Great crested newts

The majority of the site is within a green impact risk zone for great crested newts although a small portion is within the amber impact risk zone. Naturespace has confirmed that a licence or surveys will not be required, however precautionary working measures have been advised. These may be submitted within a Construction Environmental Management Plan (CEMP): Biodiversity condition and Naturespace's comments must be addressed within the CEMP.

BNG

The BNG metric shows a net gain of 27.12% area net gain, 26.8% hedgerow net gain and 19.02% net gain in watercourse units – this is welcomed although the applicant must be aware that where mitigation for protected species is required this can only be counted up to no net loss within the metric. The project ecologist has provided a further metric to demonstrate that mitigation for protected species does not extend 0 within the metric.

The proposed net gain would be considered as onsite significant and therefore a S106 for monitoring fees will be required. This site is a medium sized site of medium complexity and over 7 habitat types therefore the monitoring fees for this site will be a total of £6577.20.

If the above cannot be resolved refusal is recommended for the following reasons:

1. Buffer zones

The development shall be carried out strictly in accordance with the Ecology Landuse Parameters Plan (Rev A) dated November 2025 as submitted on the 2nd April 2026 and drawing number CSA/4057/124 prepared by CSA Environmental and the buffer zones, retained existing vegetation and proposed boundary planting as shown on the boundaries shall be maintained and retained in perpetuity of the development.

Reasons: To safeguard biodiversity as set out by the Wildlife and Countryside Act 1981 (as amended), Natural Environment and Rural Communities Act 2006, NPPF Chapter 15 (Paragraphs 192, 193, 194 and 195), Circular 06/2005, policies CSP.1 and CSP.2 of the Core Strategy and policies AP1, AP7 and AP8 of the Allocations Plan.

2. Works to be carried out in accordance with biodiversity report and associated drawings

The development shall be completed in strict accordance with the following documents and drawings as submitted with the planning application:

- i. Section 5 of the ecological report dated August 2025 (Rev D) prepared by CSA Environmental; and
- ii. Drawing number CSA/4057/124 (Rev A) dated November 2025 prepared by CSA Environmental.

All the biodiversity mitigation measures shall be implemented in full according to the specified timescales, and all mitigation features shall thereafter be permanently retained for the stated purposes of biodiversity conservation.

Reasons: To safeguard biodiversity as set out by the Wildlife and Countryside Act 1981 (as amended), Natural Environment and Rural Communities Act 2006, NPPF Chapter 15 (Paragraphs 192, 193, 194 and 195), Circular 06/2005, policies CSP.1 and CSP.2 of the Core Strategy and policies AP1, AP7 and AP8 of the Allocations Plan.

3. Lighting strategy

Notwithstanding submitted details, prior to commencement of all development works

(excluding hedgerow planting / landscaping works) a lighting assessment and details of external and internal lighting shall be submitted to and approved in writing by the Local Planning Authority. The details shall clearly demonstrate that lighting will not cause light pollution or disturb or prevent bats or other species using the site boundaries and buffer zones (hedgerows, woodland planting and buffer zones), key corridors and foraging habitat features. The lux levels within the buffer zones and key corridors shall be consistent with the Bat Conservation Trusts Guidance Note 08/23 Bats and artificial lighting in the UK: that is below 0.2lux on the horizontal and 0.4lux on the vertical plane or no higher than baseline levels. The details shall include, but not limited to, the following:

- i. A drawing showing sensitive areas and/or dark corridor safeguarding areas;
- ii. Technical description, design or specification of external lighting to be installed including shields, cowls or blinds where appropriate;
- iii. A description of the luminosity of lights and their light colour;
- iv. A drawing(s) showing the location and where appropriate the elevation and height of the light fixings;
- v. Methods to control lighting control (e.g. timer operation, passive infrared sensor (PIR)); and
- vi. Lighting contour plans both horizontal and vertical where appropriate and taking into account hard landscaping, etc.
- vii. Details of a monitoring scheme to demonstrate compliance and continued compliance with the agreed lux levels. Monitoring periods: immediately after construction, year 1, year 3 and year 5 unless extended by any required rectification measures;
- viii. Details of likely proposed rectification measures and extended monitoring timescales to check compliance (immediately after rectification, year 1, year 3 and year 5);
- ix. Legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer.
- x. Information on homeowner packs, leaflets and on-site information panels – consistent with HMMP condition.

All lighting shall be installed in accordance with the specifications and locations set out in the approved details. These shall be maintained thereafter in accordance with these details. Under no circumstances shall any other external lighting be installed.

At the end of the construction and each monitoring period, a verification report by the EcOW or similarly competent person(s) shall be submitted to the Local Planning Authority.

Reasons: To safeguard rural character from increased light pollution (CSP1) and maintain the existing value of biodiversity on and adjacent to the site to protect ^foraging/commuting bats^ in accordance with the Conservation of Habitats and Species Regulations 2017, the Wildlife and Countryside Act 1981 (as amended), Circular 06/2005, the National Planning Policy Framework (in particular section 15), NPPF chapter 15, CSP1, CSP2, AP1, AP7 and AP8.

Ecological Monitoring, reporting and remediation

Detailed ecological monitoring of bat activity (static detectors and where necessary transect or point observation surveys) shall be carried out in years 1, 3 and 5 post construction and ecological management of landscape condition and establishment of suitable lighting levels of bat flight corridors shall be carried out in years 2, 3, 5, 10, 20 and 30. Monitoring shall be carried out by a suitably qualified ecologist and reported each monitoring year in writing to the LPA together with any recommendations for remedial action which shall be agreed with the LPA and implemented as agreed within 8 months of the agreement.

Reason: To protect nocturnal wildlife in accordance with the Conservation of Habitats and

Species Regulations 2017 (as amended), the Wildlife and Countryside Act 1981 (as amended), Circular 06/2005, paragraphs 187, 192 and 193 of the National Planning Policy Framework (Chapter 15), Policies CSP1 and CSP2 of the Core Strategy and Policies AP1, AP7 and AP8 of the Allocations Plan, and in order for the Council to comply with Section 40 of the Natural Environment and Rural Communities Act 2006 as amended by the Environment Act 2021.

4. Construction Environmental Management Plan – Biodiversity (CEMP-B)

Notwithstanding the submitted details, no development shall take place (including demolition, ground works and vegetation clearance) until a Construction Environmental Management Plan - Biodiversity (CEMP-B) has been submitted to and approved in writing by the local planning authority. The CEMP-B shall include, but not necessarily be limited to, the following:

- a) Risk assessment of potentially damaging construction activities;
- b) Purpose and objectives for the proposed works;
- c) Review of site constraints;
- d) Identification of 'biodiversity protection zones';
- e) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements);
- f) The location and timing of sensitive works and mitigation to avoid harm to biodiversity features (e.g. daylight working hours only starting one hour after sunrise and ceasing one hour before sunset);
- g) Use of protective fences, exclusion barriers and warning signs, including advanced installation and maintenance during the construction period;
- h) A non-native invasive species protocol (e.g. for Japanese knotweed);
- i) Details for disposal of any wastes arising from works;
- j) The times during construction when specialists ecologists need to be present on site to oversee works;
- k) Responsible persons and lines of communication;
- l) The role and responsibilities on site of an Ecological Clerk of Works (ECOW) or similarly competent person(s); and
- m) Ongoing monitoring, including compliance checks by a competent person(s) during construction and immediately post-completion of construction works.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details.

At the end of the construction period, a verification report by the ECOW or similarly competent person(s) shall be submitted to the Local Planning Authority.

Reasons: To safeguard biodiversity as set out by the Wildlife and Countryside Act 1981 (as amended), Natural Environment and Rural Communities Act 2006, NPPF Chapter 15 (Paragraphs 180, 181, 185 and 186), Circular 06/2005, policies CSP.1 and CSP.2 of the Core Strategy and policies AP1, AP7 and AP8 of the Allocations Plan.

5. Landscaping

Notwithstanding the submitted details and prior to above ground works a scheme for hard and soft landscaping of the site (incorporating existing flora, creation of new hedgerows and trees) and including the means of enclosure and the materials to be used for hard surfacing, shall be submitted to and approved by the Local Planning Authority. The scheme shall be consistent with or included within the Habitat Management and Monitoring Plan **condition x** and include, but not be limited to:

- i) A plan showing existing vegetation to be retained and safeguarded during construction which shall be consistent with any Construction Management Plan.
- ii) A plan showing areas to be managed as public open space including a final state topography plan, where appropriate.
- iii) A landscaping implementation phasing plan, where appropriate.
- iv) Detailed planting / sowing specifications including species, size, density spacing, cultivation protection (fencing, staking, guards) and methods of weed control
- v) Details of surfacing, boundary treatments and landscaping structures including design, location, hedgehog accessibility, size, colour, materials and openings.

Development shall be carried out in accordance with the approved scheme and in accordance with the landscape implementation phasing plan.

Reason: In accordance with the principles of good design and the incorporation of biodiversity in and around developments and its enhancement in accordance with paragraphs 187, 192 and 193 of the National Planning Policy Framework, [Policies CSP1 and CSP2 of the Core Strategy](#) and [Policies AP1, AP7 and AP8 of the Allocations Plan](#), and in order for the Council to comply with Section 40 of the Natural Environment and Rural Communities Act 2006 as amended by the Environment Act 2021.

6. HMMP- onsite significant

A 30-year Habitat Management and Monitoring Plan (HMMP) shall be submitted to, and approved in writing by, the local planning authority prior to above ground works of the development hereby approved being undertaken. The plan shall include, but not necessarily be limited to, the following information:

- i. Description and evaluation of all features to be managed (including bat mitigation features), including locations shown on a site map;
- ii. Landscape and ecological trends and constraints on site that might influence management;
- iii. Aims and objectives of management, including those related to species and ensuring the delivery of at least a 10% net gain in habitat, hedgerow and watercourse units;
- iv. Appropriate management options for achieving the aims and objectives;
- v. Prescriptions for all management actions;
- vi. Extent and location/ area of proposed works on appropriate scale maps and plans
- vii. Phasing implementation plan for the creation and establishment of bat mitigation and enhancement features (woodland and hedgerow planting)
- viii. Time table for implementation demonstrating that works are aligned with proposed landscape phasing
- ix. A work schedule matrix (i.e. an annual work plan) capable of being rolled forward over 10 year periods;
- x. Details of the body or organisation responsible for implementation of the plan;
- xi. Ongoing monitoring of delivery of the habitat enhancement and creation details to achieve net gain and bat mitigation as well as details of possible remedial measures that might need to be put in place;

- xii. Timeframe for reviewing the plan; and
- xiii. Details of how the aims and objectives of the HMMP will be communicated to the occupiers of the development including through information leaflets, homeowner packs and onsite panels to be consistent with the lighting strategy.

The HMMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body (ies) responsible for its delivery. The plan shall also set out (where results from monitoring show that conservation aims and objective of the HMMP are not being met) how contingencies and/ or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The HMMP shall be implemented in full in accordance with the approved details.

Reason: To secure the delivery of at least a 10% biodiversity net gain for the required 30-year period and appropriate management of all habitats including for bat mitigation in accordance with Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021), paragraphs 187, 192 and 193 of the National Planning Policy Framework, Policies CSP1 and CSP2 of the Core Strategy and Policies AP1, AP7 and AP8 of the Allocations Plan.

7. The Biodiversity Gain Plan shall be prepared in accordance with the [Biodiversity Net Gain Assessment] dated [March 2025] and prepared by [CSA Environmental].

The Biodiversity Gain Plan submitted pursuant to the national biodiversity condition must be in accordance with the Biodiversity Net Gain Assessment dated March 2025 and prepared by CSA Environmental, as submitted with the planning application and implemented in accordance with the approved details.

Reason: To secure the delivery of at least a 10% biodiversity net gain through successful establishment and management of all newly created and enhanced habitats in accordance with Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021), paragraphs 187, 192 and 193 of the National Planning Policy Framework, Policies CSP1 and CSP2 of the Core Strategy and Policies AP1, AP7 and AP8 of the Allocations Plan.

8. Biodiversity Enhancement

Notwithstanding the submitted details, before above ground works commence a scheme for biodiversity enhancement, such as the incorporation of integrated permanent bat roosting feature(s), hedgehog homes, hedgehog friendly fencing and nesting opportunities for birds including integrated swift bricks, shall be submitted to and agreed in writing with the Local Planning Authority. The approved details thereafter shall be implemented, retained and maintained for their designed purpose in accordance with the approved scheme.

The scheme shall include, but not limited to, the following details:

- i. Description, design or specification of the type of feature(s) or measure(s) to be undertaken;
- ii. Materials and construction to ensure long lifespan of the feature/measure

- iii. A drawing(s) showing the location and where appropriate the elevation of the features or measures to be installed or undertaken.
- iv. When the features or measures will be installed within the construction, occupation, or phase of the development.

Reason: To provide additional opportunities for roosting for bats and nesting birds as a biodiversity enhancement, in accordance with paragraphs 187, 192 and 193 of the National Planning Policy Framework (Chapter 15), Policies CSP1 and CSP2 of the Core Strategy and Policies AP1, AP7 and AP8 of the Allocations Plan, and Section 40 of the Natural Environment and Rural Communities Act 2006 as amended by the Environment Act 2021.

Informative:

IMPORTANT: BIODIVERSITY NET GAIN CONDITION - DEVELOPMENT CANNOT COMMENCE UNTIL A BIODIVERSITY GAIN PLAN HAS BEEN SUBMITTED (AS A CONDITION COMPLIANCE APPLICATION) TO AND APPROVED BY THE FOREST OF DEAN DISTRICT COUNCIL.

The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition "(the biodiversity gain condition)" that development may not begin unless:

(a) a Biodiversity Gain Plan has been submitted to the planning authority, and

(b) the planning authority has approved the plan in writing.

The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan if one is required in respect of this permission would be Forest of Dean District Council. There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply. Based on the information available this permission is considered to be one which will require the approval of a biodiversity gain plan before development is begun because none of the statutory exemptions or transitional arrangements are considered to apply. If the onsite habitats include irreplaceable habitats (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitats) Regulations 2024) there are additional requirements for the content and approval of Biodiversity Gain Plans. Advice about how to prepare a Biodiversity Gain Plan and a template can be found at <https://www.gov.uk/guidance/submit-a-biodiversity-gain-plan>.

The Gloucestershire Local Nature Recovery Strategy (LNRS) has been published by Gloucestershire County Council. This strategy must be used to inform the Strategic Significance Multiplier in the Statutory Biodiversity Metric or the Small Sites Metric, depending on which version has been submitted. As part of your discharge of condition application the biodiversity metric will need to be updated to refer to the published LNRS <https://www.gloucestershire.gov.uk/planning-and-environment/ecology-and-landscape/gloucestershire-local-nature-recovery-strategy/>

i EU Exit – The European Union (Withdrawal Agreement) Act 2020 (the EUWA) ended the supremacy of EU law in UK law, it converts directly applicable EU legislation (in particular, EU Regulations and Decisions) as it stands at the moment of exit into domestic law, and will preserve legislation previously made in the UK to implement EU obligations.

The legislation will generally have the same effect that it had before the UK left the EU, unless or until it is changed by Parliament.

In some cases there may be changes in referencing and guidance as a result of secondary legislation amendments. Changes may move at pace and it may not be possible to update all processes immediately. Where reference to specific legislation is made the reader should check to ensure referencing is consistent with any subsequent legislation amendments. Further information can be found at: <https://www.gov.uk/guidance/eu-exit-secondary-legislation-laid-with-impacts-on-local-government>

ii Commonly Used Ecology and Landscaping Planning Conditions may be found at <https://www.fdean.gov.uk/media/6119/st-core-conditions-sept-18vr6post-c-e-pub.pdf>