

Ecology Briefing Note

Carisbrook Road, Mitcheldean. August 2025

1.0 Introduction

- 1.1 This note has been prepared in response to queries raised by Forest of Dean District Council (FoDDC) in relation to the outline planning application submitted by Gladman Developments for development of up to 180 dwellings at Carisbrook Road, Mitcheldean (ref P0672/25/OUT).
- 1.2 It specifically relates to the consultation response by Anouska Laramy, Biodiversity Officer dated 17/07/2025. The Council has also submitted a record of their Preliminary Screening for Likely Significant Effects under Regulation 63 of the Conservation of Habitats and Species regulations 2017, to which reference is made within their main response.

2.0 Discussion of Comments

Horseshoe Bats/ FoD and Wye Valley SAC

Survey Data

- 2.1 The planning application was submitted prior to completion of all bat survey work at the Site. The Ecological Impact Assessment (EcIA) was therefore acknowledged to be interim and in need of updates following receipt of the remaining bat survey data from Spring/Summer 2025.
- 2.2 This work has now been completed and an updated EcIA to include finalised bat survey appendix (ref CSA/4057/13C) and an updated report to inform the Council's Habitats Regulations Assessment (CSA/4057/17C) are submitted to FoDDC for review. The reports now make reference to autumn and winter survey data from 2018-2019 and a full year's data (covering both active and non-active bat activity periods) between July 2024 and June 2025.
- 2.3 Since submission of the interim EcIA, it is worth noting that the spring and summer 2025 data did not introduce any significant changes to the conclusions of the reports already submitted.
- 2.4 With receipt of this information, it is anticipated that the Council will now be able to complete their assessment of the proposals.

Removal of Scrub

- 2.5 FoDDC have questioned whether the removal of c. 20m of bramble scrub constitutes a bat flight path.

- 2.6 The scrub is growing along an old post and wire fence with the majority of vegetation location on the offsite road verge. In places it is mixed with bracken which provides a more substantial belt of vegetation during the summer. The Google Earth Streetview screenshot from March 2025 shows the area proposed for clearance. The extent of bramble within the area proposed for clearance is limited to the fenceline and much of the vegetation on the verge itself is bracken (see Photo 1 below). It is worth noting that vegetation on the bend is subject to annual cutting (May) by Gloucestershire County Council¹ which controls the extent of scrub. The area included within the metric represents a narrow linear length.



Photo 1: Linear scrub along fenceline and patch of bracken on Ross Road/Carisbrook Road verge. Google Earth imagery date 03/2025.

- 2.7 Whilst the scrub corridor may well be used by horseshoe bats it is by no means considered to be a significant flight path for these species. It serves to join up some of the boundary clumps of trees but offers no wider connectivity, is very low in height and affected by high levels of street lighting along Carisbrook Road. Bat survey data shows occasional use of the southern tip of the Site by horseshoe bats though activity is low compared to more northern areas of the Site.
- 2.8 It is worth noting that the development proposals show new hedgerow and mixed scrub planting along this boundary to provide a more significant feature.

Recreational impacts on the SAC

- 2.9 It was acknowledged in the EclA report that new residents of the development would be expected to make certain use of woodland

¹ <https://www.gloucestershire.gov.uk/roads/road-maintenance/grass-cutting/>

areas to the west of the Site for dog walking and recreation. A mitigation package involving provision of on-site recreational opportunities and preparation of a Residents Pack (acceptable by Natural England for other designated sites e.g. Cotswold Commons and Beechwoods SAC) was included as part of the proposals to mitigate potential damage to woodland habitats.

2.10 This approach was considered appropriate on the basis of the following points:

- Public access to woodland and other habitats likely used by bats associated with the SAC is spread over a very large area, and thus relatively diffuse.
- The number of visits generated by this relatively small development, in combination with existing pressure from a small town in a rural location, is likely to be modest, and with further consideration of the extensive amount of land available, damage and deterioration to horseshoe bat foraging habitats would need to be considerable to have a significant impact on the conservation status of the SAC population.
- Access into the woodlands from the Site/town is via very steep paths and this is likely to discourage most day-to-day dog walking, which would be expected to favour less strenuous routes to the south-east and south-west of the Site.
- Disturbance to hibernation roost sites is unlikely to be a threat from general recreational activities (more so from caving/anti-social behaviour)

2.11 Should monitoring of existing and future visitor pressure on the woodlands to the west of the Site be requested, a future package of monitoring could be agreed to inform future conservation measures. Further discussion on monitoring methods, timescales, reporting and triggers for remediation would be needed with the relevant stakeholders.

Dormouse Survey and Impacts

2.12 Further information on the length of bramble scrub to be impacted is shown above. Hopefully this helps demonstrate the negligible amount of habitat proposed for impact and its low suitability for dormice. Looking closely at its location and the poor connectivity of this modest area of habitat to more suitable habitat, the likelihood of dormice expanding into the Site is considered to be extremely low. If dormice are located within habitats to the west where records suggest, the only logical point of connection to the Site is a hedgerow adjacent to the Lining Wood development, separated from the Site by a busy road. Furthermore, with review of habitats to the south and east of the Site, there is no additional resource/characteristics which would draw

dormice to expand into these boundaries which contain limited and peripheral areas of low vegetation.

- 2.13 As such, we maintain the conclusion to scope out dormice from the ecological impact assessment, is correct. If deemed appropriate, precautionary working methods could be used to further remove any residual risk there is considered to be to dormice.

Breeding Birds

- 2.14 When survey work at the Site was initially considered it was under cultivation as potatoes (2018). It has since been winter cereal crop but was put to a dense rye-grass ley in 2024 when the site was revisited and ecology survey work updated, being shortly thereafter being cut for hay/silage and subsequently grazed. As a result, bird survey work was scoped out and many hours of time on-site for other survey work (by an experienced ornithologist) has not incidentally identified a skylark or other ground-nesting birds (except pheasant), other than one individual skylark singing offsite to the north, as acknowledged in the EclA report.
- 2.15 Whilst it is not possible to categorically rule out the potential for the Site to be used by notable farmland birds, following 50+ site visits in 2018/2019 and 2024/25, the absence of notable species sightings is considered strong evidence that the assessment made at the outset was robust and the scoping out of detailed bird surveys was appropriate.

Biodiversity Net Gain

- 2.16 It is agreed that the Biodiversity Net Gain provision for the Site must be 'additional' to mitigation for protected species, though this can be demonstrated without the need for two separate metrics.
- 2.17 Protected species mitigation can only contribute biodiversity units up to no net loss, meaning at least 10% of the Site's total gain must be delivered by unrelated measures.
- 2.18 In this instance the baseline value of the Site is 20.86 habitat units so to achieve 10% net gain, a total of 22.946 units needs to be delivered (110%). To comply with additionality rules, at least 10% of this figure (2.29 units) needs to be 'additional' to bat or other species mitigation.
- 2.19 With reference to the Statutory Metric submitted, the proposed development delivers the following habitat units:
- Developed land; sealed surface: 0 units
 - Vegetated garden: 3.11 units
 - Sustainable Drainage Systems: 0.82 units
 - Modified grassland: 2.55 units
 - Other neutral grassland: 7.78 units
 - Other woodland; broadleaved: 6.15 units
 - Mixed scrub: 3.17 units

- Urban trees: 1.57 units
- 2.20 This demonstrates that whilst woodland, scrub and grassland habitats included in the scheme as bat mitigation contribute to the majority of biodiversity units delivered, there is in excess of 10% units delivered by unrelated measures (gardens and modified grassland).
- 2.21 Hedgerow proposals include enhancement of western boundary H4, and provision of new hedgerow planting along the south-west and southern boundaries. As the proposals are outline at this stage there is no detail on proposed hedgerow planting within the development which will include a range of ornamental and native hedgerow planting as standard. As the number of baseline units is 1.59, only 0.17 units (10% of 110%) need to be delivered through such provisions which would equate to up 200m of new planting. As for habitat units above, this would need to be confirmed as part of future detailed designs and confirmation of an updated metric calculation.
- 2.22 The ditch adjacent to Site (included in the metric) is a very minor feature of limited ecological value and the proposals are not considered to conflict with additionality rules.

3.0 Conclusion

- 3.1 To conclude, further information has been submitted to conclude the bat survey work undertaken in 2024/25, to enable FoDDC to complete their assessment of the proposed development.
- 3.2 Further clarification has been given in relation to other points of query raised by FoDDC.