



Gloucestershire
Wildlife Trust

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P0672/25/OUT - 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)

Context and Site Sensitivity

The proposed development covers ~9.72ha of arable land bounded by hedgerows and trees on the northern edge of Mitcheldean. While the site itself is of low intrinsic ecological value, its context is highly sensitive:

- **~480m from Wigpool Iron Mine SSSI** (a hibernation site for lesser and greater horseshoe bats)
- **Within 1km of the Wye Valley & Forest of Dean Bat SAC**
- Surrounded by multiple **Local Wildlife Sites (LWSs)**, including ancient woodland (Scully Grove LWS, 640m SW)
- Directly adjacent to **Nature Recovery Network (NRN)** woodland priority habitat along the eastern boundary

Although the land is proposed for housing in the draft Local Plan (Policy LP.93), the ecological risk profile remains high, and the proposal must be judged accordingly.



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SAC Impact & HRA Screening

The application includes an Information to Inform Habitats Regulations Assessment (HRA) document, which concludes no likely significant effects on the SAC. However, the assessment raises several issues:

- Short-duration bat activity surveys - likely under-representing seasonal foraging patterns.
- Lack of detailed analysis of cumulative recreational impact or visitor pressure on bat roosts.
- Over-reliance on "residents' packs" to manage behavioural impacts on nearby woodland and SSSI features.
- Absence of defined dark corridors or movement buffers linking to known foraging areas.

Given the proximity to an internationally designated site, and the known sensitivity of horseshoe bats to light and disturbance, the precautionary principle should apply. The application may require an Appropriate Assessment, and Natural England input should be sought.

In addition, the application does not appear to be supported by winter season bat activity or hibernation surveys, despite the site lying just ~480m from Wigpool Iron Mine SSSI. A designated hibernation roost for greater and lesser horseshoe bats. Surveys conducted only during the main active season are likely to underestimate the potential use of boundary hedgerows or nearby foraging zones during colder months. In light of Natural England's guidance and the SAC's status, hibernation season surveys (Nov–March) should be required to fully inform the Habitats Regulations Assessment and mitigation strategy.

The application also does not appear to give adequate weight to cumulative recreational impacts on the wider Wigpool Nature Reserve and surrounding woodlands, which form a sensitive part of the SAC's functionally linked habitat. Given that the SAC lies within walking distance cumulative visitor pressure and habitat wear-and-tear require explicit assessment. This should include footpath desire lines, car parking behaviour, and impacts on woodland flora, soils, and bat foraging zones. From such findings an a robust access plan would be of use to help reduce any national impacts on the site.





Biodiversity Net Gain (BNG) and Green Infrastructure

The applicant's BNG report and metric claim:

- +26.52% Habitat Units
- +7.52% Hedgerow Units
- +0.53% Watercourse Units

These figures exceed the statutory 10% threshold. However, the quality and strategic value of the gains are questionable:

Peripheral and Fragmented Layout: The green infrastructure (GI) strategy is predominantly peripheral. Habitat gains are concentrated at the site's edges — such as field corners, boundary strips, and the margins of the SuDS basin — rather than forming part of an integrated, multifunctional landscape structure. There is limited evidence that habitat corridors have been designed to intersect the development core or support ecological connectivity across the site. This is particularly problematic given the site's location immediately adjacent to mapped woodland habitat forming part of the Nature Recovery Network (NRN) to the east. Without effective linkages or buffers to these adjacent habitats, the BNG proposals risk delivering isolated fragments rather than a cohesive ecological network.

Over-Reliance on SuDS Features: A substantial portion of the claimed habitat gain appears to derive from the site's attenuation basin, classified in the metric as "Urban – SuDS (moderate condition)". While SuDS can provide biodiversity value if designed appropriately, no clear evidence is provided that this basin will be planted or managed to function as a wetland or species-rich habitat. There is no mention of marginal aquatic planting, wet grassland transition zones, or habitat enhancements for amphibians, invertebrates, or birds. Without such detail, the SuDS contribution to BNG is superficial and of questionable long-term value.

Strategic Disconnection from the NRN: Despite lying directly adjacent to a priority woodland habitat identified within the NRN, the proposals do not include measures to reinforce or buffer this strategic habitat. No woodland-edge enhancement, transitional planting, or spillover habitat is proposed to support woodland species. There is also no indication of strategic corridors linking the site to nearby Local Wildlife Sites (e.g. Scully Grove LWS) or facilitating movement across the wider landscape. As a result, while the metric assigns basic strategic value to the on-site gains, the proposals fail to demonstrate meaningful alignment with NRN goals as required by national guidance.





Lack of Design-Led Integration: There is little evidence that the BNG strategy has influenced the core layout or movement framework. Green infrastructure appears to be layered on top of a conventional layout rather than shaping it from the outset. Habitats are not well integrated and the Design and Access Statement focuses primarily on visual amenity and landscaping rather than ecological function.

Uncertain Delivery and Management: Although the BNG report references a 30-year management period, no Landscape and Ecology Management Plan (LEMP) is submitted at this stage. There is no outline of stewardship arrangements, secured funding, or a monitoring and reporting framework. This raises concerns that even if gains are delivered initially, they may not be sustained in practice. Without enforceable delivery mechanisms and long-term oversight, the BNG figures risk becoming notional rather than real.

While the development exceeds the headline 10% BNG requirement on paper, the proposals are not ecologically robust. The design fails to create a functionally connected landscape, does not engage with the site's strategic ecological position, and relies heavily on low-distinctiveness habitat types. Without substantial revision or conditioning, the BNG contribution risks being peripheral, isolated, and ineffective in delivering meaningful biodiversity improvement.

Lighting and Bat Corridors

The submitted Lighting Strategy lacks sufficient detail to demonstrate protection of nocturnal species or habitat corridors:

- No vertical lux contour mapping is provided
- No designated "dark corridors" are proposed
- Access roads and residential sprawl extend toward key bat commuting hedgerows and trees
- Horseshoe bats, known to use hedgerows for navigation and foraging, are especially light-sensitive

Bat Conservation guidance both stress the importance of avoiding light spill into hedgerows and woodland edges. The absence of enforceable lighting zones risks undermining any claimed mitigation.





Trees, Hedgerows and Habitat Features

The site supports:

- 13 trees (incl. T1 Oak and T2 Ash, both covered by TPO)
- 3 hedgerows (H1–H3), all Category B with species diversity and structural value
- No ancient woodland or veteran trees on-site

It is welcome that no tree or hedgerow loss is proposed at this stage. However, retention alone is insufficient:

- The layout must include root protection zones, buffer planting, and interface treatments
- Hedgerows, particularly those adjacent to NRN zones, should be strengthened and buffered
- Tree-lined streets are mentioned but not shown with detail or species selection

Recommendations and Conditions

Should permission be granted, the following are essential:

- Full Appropriate Assessment under the Habitats Regulations
- Submission and approval of a LEMP including:
 - Lighting strategy aligned with ILP GN08/23 and BCT guidance
 - Strategic NRN connectivity and buffer planting
 - 30-year management plan with secured funding
- Reserved matters to be conditioned against:
 - BNG layout integration
 - Dark corridors and SAC impact safeguards
 - Tree protection, street greening, and greatly improved GI connectivity
 - Winter Bat surveys





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The scheme represents a numerically compliant but ecologically underwhelming proposal in a highly sensitive landscape. The proximity to internationally protected bat habitat, adjacency to NRN woodland, and lack of integration of ecological principles into the layout all raise serious concerns. Mitigation measures are generic, BNG is spatially weak, and the site's ecological role is under-acknowledged.

Approval should be withheld unless substantial revisions are made, or robust and enforceable conditions are applied to secure meaningful ecological performance.

Regards

Josh Gibbs
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