Ecological Assessment

Emergency/Overspill Carpark - CTCRM

Lympstone, Exmouth

19th June 2023

Tyler Grange

TG Report No. 15017_R01_AH_XX

Report No:	Date	Revision	Author	Checked
15017_R01	19th June 2023	-	Anthony Hiscocks MSc BSc (Hons) ACIEEM	Rachel Chatting BSc MSc MCIEEM

Contents:

Appendices:

Plans:

Summary

S.1. Tyler Grange Group Ltd was appointed by Hydrock South West on behalf of the Defence Infrastructure Organisation (DIO) to undertake an Ecological Assessment of land identified as the Emergency/Overspill Carpark at The Commando Training Centre Royal Marines (CTCRM), Lympstone, hereafter referred to as the 'site'

S.2. The site comprises an area of modified grassland which is subject to intensive management and used for amenity/training purposes, as well as a car park on occasion. This grassland extends offsite to the north, with an existing car park to the west and with boundary hedgerows to the south and east.

S.3. The proposals for the site are for the creation of an overflow carpark which would be used to provide additional parking at the CTCRM to accommodate regular and occasional visitors.

S.4. The site is not covered by any statutory protection, although a number of such sites are present locally. Measures will be implemented during construction to ensure that no impacts occur to any designated sites as a consequence of the proposals.

S.5. The site is of limited ecological importance being subject to regular disturbance and intensive management. Surveys of the site and adjacent habitats have nonetheless been completed following the standard guidelines, where considered necessary.

S.6. The site is considered to be of limited importance for bats, breeding birds and reptiles, with the majority of habitats intensively managed and providing few opportunities for these faunal groups. Whilst some species may be present in low numbers, the habitat of greatest importance, the hedgerows, are to be retained and no impacts are anticipated.

S.7. No evidence of badger setts was identified at the site although a badger push through was recorded suggesting this species does use the site on occasion.

S.8. Appropriate mitigation will be implemented to ensure no adverse impacts occur to any protected species as a result of the development.

S.9. The proposals include the retention and protection of the most ecologically important habitats on site, namely the hedgerows. The majority of the existing grassland habitat within the site will be lost to facilitate the proposals although areas of grassland will be retained where possible. Post-development the parking area would be oversown with a similar grassland mix which will largely replace the habitat lost and provide continued opportunities for biodiversity.

S.10. With the implementation of the mitigation and enhancement strategy described, the proposed development would be in conformity with relevant planning policy and legislation.

Section 1: Introduction and Methodology

Introduction

1.1 Tyler Grange Ltd were instructed by Hydrock South West on behalf of the Defence Infrastructure Organisation (DIO) to undertake an Ecological Assessment of land identified as the 'Emergency/Overspill Carpark' at The Commando Training Centre Royal Marines (CTCRM), Lympstone (hereafter referred to as the 'site'). The site is centred on National Grid Reference SX 98983 86150.

1.2 The proposals for the site are for the creation of an overflow carpark which would be used to provide additional parking at the CTCRM to accommodate regular and occasional visitors. This proposed site is currently used as a car park on occasion, but rapidly deteriorates in wet conditions and does not provide long-term functionality.

1.3 The majority of the site comprises an area of modified grassland which is subject to intensive management and used for training/amenity purposes as well as being used as a helicopter landing space and occasional car park. This area of grassland extends offsite to the north and west and is bound by hedgerows to the south and east.

1.4 The purpose of this report is to:

- Use available background data and results of field surveys, describe and evaluate the ecological resources present within the likely 'zone of influence' (ZoI) of the proposed development;
- Assess ecological issues and opportunities as a result of development; and
- Where appropriate, describe mitigation and enhancement proposals, together with planning controls to ensure their delivery and conformity with relevant policy and legislation.

Definitions

1.5 The 'site' is defined by the application red-line boundary (see **Plan 15017/P01**) and is located to the north of the village of Lympstone and comprises part of the wider CTCRM base to the east. The 'study area' extends to a 2km radius for Protected and Priority Species records and non-statutory site designations, a 2km radius for nationally designated statutory sites and a 10km radius for European statutory designated sites.

Methodology

1.6 The scope of the ecological assessment is determined by undertaking a desk-based assessment of available records and published sources, together with an initial site survey. With this information, the zone of influence of the proposed works area was established.

1.7 This Ecological Assessment has therefore been informed by the following, with detailed methods provided below:

- Full desk study and records search (see Appendix 2); and
- Extended Phase 1 habitat survey (see Appendix 2)

1.8 The above scope of work has informed the description and assessment of importance of ecological features - in line with the 'Guidelines for Ecological Impact Assessment' published by the Chartered Institute for Ecology and Environmental Management (CIEEM) (CIEEM, 2019) - the consideration of opportunities and constraints to development, and mitigation and enhancement requirements to ensure conformity with legislation and policy (see Appendix 1). In addition, all work undertaken complies with British Standard's for Biodiversity – BS42020 (BSI Standards Publication 2013).

Quality Control

1.9 All ecologists at Tyler Grange Group Ltd are members of CIEEM and abide by the Institute's Code of Professional Conduct.

Section 2: Ecological Features

2.1 Ecological features within the site are described below, together with an assessment of their importance using a geographical frame of reference advocated by CIEEM (2019).

Protected Sites

2.2 The site is not covered by any statutory or non-statutory designation for nature conservation importance, although several designated sites are present in the study area, which are detailed in Table 2.1 below.

Table 2.1: Protected Sites

Designation	Site Details	Importance
European Protected Sites	**Exe Estuary Special Protection Area (SPA) and Ramsar** - located approximately 0.7km west. This SPA is designated due to supporting populations of European importance of the overwintering Annex I species: Avocet *Recurvirostra avosetta* and Slavonian Grebe *Podiceps auratus*. In addition, this SPA regularly supports at least 20,000 waterfowl.	International
	East Devon Heaths SPA and East Devon Pebblebed Heaths Special Area of Conservation (SAC) - located approximately 3.4km east. The SAC is designated for the presence of the Annex I habitats Northern Atlantic wet heaths with *Erica tetralix* and European dry heaths. The SPA is desingated for the presence of Annex II species Dartford warbler *Sylvia undata* and nightjar *Caprimulgus europaeus*.	
	Dawlish Warren SAC - located approximately 5.8km south. This SAC is designated for the presence of the Annex I habitat Humid dune slacks which support a population of the Annex II species petalwort *Petalophyllum ralfsii*. The Annex I habitats Shifting dunes along the shoreline with European Marram Grass *Ammophila arenaria* (""white dunes"") and Fixed coastal dunes with herbaceous vegetation (""grey dunes"") are also present, but are not a primary reason for selection.	
Nationally Protected sites	**Exe Estuary Sites of Special Scientific Interest (SSSI) –** located approximately 0.7km west. This SSSI is designated for supporting over 10,000 wildfowl and 20,000 waders in winter including species such as dark-bellied Brent goose *Branta bernicla bernicla*, wigeon *Anas penelope*, ringed plover *Charadius hiaticula* and black-tailed godwit *Limosa limosa*. No other nationally protected sites are located within the study area.	National

Non-statutory sites	Only one confirmed County Wildlife Site (CWS) is present within the study area, namely Woodbury Road Station CWS located approximately 0.7km to the west. This CWS is designated due to the presence of saltmarsh and grazing marsh. In addition, five Unconfirmed Wildlife Sites (UWS) are present within the study area. These comprise sites identified as having possible interest but not fully surveyed and include: • The Brake UWS located approximately 0.5km east and designated for old coppiced woodland; • Nutwell Park UWS located approximately 0.8km south and designated for parkland; • Nutwell Park Ponds UWS located approximately 1.1km south and designated for parkland ponds; • Harefield UWS located approximately 1.5km southeast and designated for parkland with veteran trees; and • Lympstone Railway cutting UWS located approximately 1.8km south and designated for improved grassland	Local
Ancient woodland	No areas of ancient woodland are present within or adjacent to the site with the closest area of ancient woodland located approximately 0.8km south.	National

Habitats and Flora

2.3 Habitats present within the site and adjacent to it, along with their ecological importance (CIEEM, 2019) are detailed in Table 2.2 and shown on **Plan 15017/P02**.

Table 2.2: Site Habitats

Habitat	Description	Importance
Bareground/ hardstanding	A small area of bareground is present across the site entrance, comprising ground disturbed by vehicle movements, as well as two small areas of concrete hardstanding. This habitat is subject to regular use and is primarily unvegetated. **Photo 1: Site entrance including bareground and hardstanding** 	None

Building	No permanent buildings are present at the site, although a single shipping container is present on the northern boundary (building B1). This shipping container is used for storage and is well maintained. **Photo 2: Shipping container (Building B1)** 	None
Modified grassland	The predominant habitat at the site is modified grassland which is subject to intensive management through mowing and is regularly used for amenity/training purposes. This grassland is also used as a car park on occasion and areas of disturbed bare ground are present as a result of vehicle movements and damage in wet weather. **Photo 3: Modified grassland looking west**  The grassland is species poor being dominated by perennial rye grass *Lolium perenne* and Yorkshire fog *Holcus lanatus* with occasional cock's foot *Dactylus glomerata* also present. This grassland is maintained to a short sward height with other species present limited	Site

	to yarrow *Achillea millefolium*, ribwort plantain *Plantago lanceolata*, cat's ear *Hypochaeris radicata*, dandelion *Taraxacum officinale*, broadleaved dock *Rumex obtusifolius*, daisy *Belis perennis* and occasional creeping buttercup *Ranunculus repens*.	
Ruderal vegetation	In the southwestern corner of the site a small area of ruderal vegetation is present in association with areas of bareground (see above). This vegetation had been recently cut at the time of survey and with bark chippings added, likely to supress vegetation regrowth. Species present include common nettle *Urtica dioica*, hogweed *Heracleum sphondylium*, rapeseed *Brassica napus*, bristly ox tongue *Helminthotheca echioides*, fat hen *Chenopodium album*, cleavers *Galium aparine*, field bind weed *Convolvulus arvensis* and hedge bind weed *Calystegia sepium*. **Photo 4: Area of ruderal vegetation adjacent to hedgerow H1** 	Site
Hedgerows	Two hedgerows are present on the southern and eastern boundaries of the site. **Photo 5: Hedgerow H1 looking east** 	Local

	Hedgerow H1 primarily comprises a vegetated bank which is dominated by ruderal species along with scattered saplings of trees including oak *Quercus robur*, elm *Ulmus* sp., rose *Rosa* sp., blackthorn *Prunus spinosa*, holly *Ilex aquifolium* and field maple *Acer campestre*. This hedge is however defined as species poor owing to the distribution of species. Ruderal species dominate including bramble *Rubus fruticosus*, hogweed, common nettle, ivy *Hedera helix*, broadleaved dock, creeping thistle *Cirsium arvense*, Yorkshire fog, lords and ladies *Arum maculatum*, cleavers and hedge bedstraw *Galium mollugo*. This hedge is subject to intensive management which has resulted in the suppression of woody growth. This hedgerow extends offsite to the west (see below). **Photo 6: Hedgerow H2 looking north**  Hedgerow H2 extends offsite to the north and comprises a dense species poor intact hedge. This hedge is box cut to approximately 2m tall and with no standard trees along its length. Elm and hawthorn *Crataegus monogyna* dominate along with occasional spindle *Euonymus europaeu*s and rose and with the ground flora dominated by ivy, bramble, common nettle and with occasional hogweed.	
Offsite habitats	The modified grassland within the site extends offsite to the north, with this wider habitat identical in character to that within the site. To the west of the site is an area of hardstanding car parking and with hardstanding multisport pitches to the northwest. Hedgerow H1 extends offsite to the west and becomes a tall intact hedgerow dominated by woody vegetation including oak, elm hawthorn and blackthorn. A mature standard oak tree is also present within this hedge to the west of the site boundary. To the south of H1 is a narrow lane with part of the wider CTCRM beyond. Hedgerow H2 extends offsite to the north where it is identical in character to that within the site. To the east of hedgerow H2 is a large arable field with open countryside beyond.	Site

Protected and Priority Fauna

2.4 Details of protected and Priority Species using the site are described below and should be read in conjunction with **Plan 15017/P02**.

Amphibians

2.5 Devon Biodiversity Records Centre (DBRC) holds records for three amphibian species with the closest, common toad *Bufo bufo*, common frog *Rana temporaria* and smooth newt *Lissotriton vulgaris* all located approximately 1.7km north in 2013.

2.6 The site is located within the great crested newt (GCN) *Triturus cristatus* consultation zone (Natural Devon, 2016), which comprises zones of 5km around known GCN records. No records of GCN were however returned within 2km of site by DBRC.

2.7 No ponds or waterbodies are located within or adjacent to the site, and an analysis of local OS maps and aerial photography indicates the closest is located approximately 0.18km south. No other ponds are located within the typical dispersal range of GCN (c.250m). Overall given the lack of waterbodies at the site and the absence of records, it is considered that GCN would not occur on the site and this species is not considered further.

2.8 The terrestrial habitats within the site, including the hedgerows, do however offer some opportunities for common amphibians, although these opportunities are limited by the lack of suitable connected aquatic habitat. Similar and better-quality habitats are present locally and overall the site is considered to be of **negligible ecological importance** for amphibians.

Badgers

2.9 DBRC returned numerous records for badger with the closest located approximately 0.13km southeast from 2002. No additional details on the type of record were provided by DBRC.

2.10 No evidence of badger setts was recorded within or adjacent to the site although a badger push through was recorded across hedgerow H2, and it is anticipated that badger utilise the site for foraging or commuting on occasion. Opportunities at the site for badger are however reduced by the small size of the site and intensive management the habitats receive, with more extensive and better-quality habitats present locally.

2.11 Badgers are a widespread species protected for welfare rather than conservation reasons, principally to protect them from persecution and given the relatively small size, the site is considered to be of **negligible importance** to badgers.

Bats

2.12 DBRC holds records for a number of bat species within the study area with the closest comprising a roost record of common pipistrelle *Pipistrellus pipistrellus* located approximately 0.7km west in 2009. Other species recorded in the study area include soprano pipistrelle *Pipistrellus pygmaeus*, noctule *Nyctalus noctula*, Nathusius's pipistrelle *Pipistrellus nathusii*, brown long-eared *Plecotus auritus*, serotine *Eptesicus serotinus*, lesser horseshoe *Rhinolophus hipposideros*, greater horseshoe *Rhinolophus ferrumequinum* and barbastelle *Barbastella barbastellus*.

2.13 No trees with potential to support roosting bats are present within the site and the shipping container (Building B1) is assessed as not having any bat roosting potential being of metal construction and well-sealed with no access points identified.

2.14 The majority of habitats within the site are not optimal for bats, comprising managed modified grassland and with hedgerow H1 species-poor and primarily comprising a vegetated bank which offers limited opportunities for foraging or shelter for commuting. Hedgerow H2 as well as other hedges in the local area do offer some opportunities for bats and it is anticipated that some common species would utilise the site on occasion.

2.15 Similar and better-quality habitats are however common locally and it is not considered that any bat species would be reliant upon the site. Overall, the site is assessed as being of **negligible importance** to the local bat population**.**

Breeding Birds

2.16 DBRC returned a diverse range of bird records for within the study area with the none recorded within the site. The majority of records comprise species associated with the Exe estuary with the closest record located approximately 0.6km west and comprising spoonbill *Platalea leucorodiathe* and BoCC amber listed grey wagtail *Motacilla cinerea* in 2001.

2.17 The site is located within a RSPB cirl bunting *Emberiza cirlus* consultation zone (RSPB, 2017), which comprises 2km zones around known breeding cirl bunting records. No records for cirl bunting were however returned by DBRC and with the closest record, as shown on the Devon County Council Environment Viewer[1], located at least 1.6km south. Whilst located within a consultation zone, the site habitats are not considered to be suitable for cirl buntings, lacking both the tussocky pasture and scrub favoured by this species for breeding, and the arable stubble favoured for winter foraging (RSPB, 2017). Furthermore, the site habitats are subject to regular and intensive management and overall, given the small size of the site and lack of suitable opportunities, the potential presence of cirl buntings is discounted.

2.18 Whilst the habitats within the site, including hedgerows and grassland provide some nesting and foraging habitat for common garden and farmland bird species, these opportunities are limited by the small size of the site and the intensive management the habitats receive. In addition, the site does not provide optimal habitat for wintering birds lacking the necessary habitat requirements such as ploughed fields, arable stubble, wetlands and mud flats.

2.19 Extensive and better-quality habitats for nesting and foraging birds are common locally and overall, the site is not considered to be of any particular ornithological interest and would be of no more than **site ecological importance** to birds.

Invertebrates

2.20 DBRC holds extensive invertebrate records although none were returned for within the site. Records for a number of priority moth species were returned at a location approximately 0.5km west in 2015 including for beaded chestnut *Agrochola lychnidis*, green-brindled crescent *Allophyes oxyacanthae*, sallow *Cirrhia icteritia,* dusky thorn *Ennomos fuscantari,* August thorn *Ennomos quercinaria*, small emerald *Hemistola chrysoprasaria*, ghost moth *Hepialus humuli*, lackey

[1] https://www.devon.gov.uk/environment/environmental-maps

Malacosoma Neustria, large wainscot *Rhizedra lutosa*, blood-vein *Timandra comae*, cinnabar *Tyria jacobaeae* and oak hook-tip *Watsonalla binaria*.

2.21 The habitats provide some suitable habitat for common invertebrate species, but this is limited by the small size of these habitats, with more extensive opportunities available in the wider area.

2.22 Based on the small size of the site, which comprises habitats that are common in the local area, any impacts to invertebrates will be limited. Therefore, the site is considered to be of **negligible ecological importance** for invertebrates.

Reptiles

2.23 DBRC holds a single reptile record within the study area namely for slow worm *Anguis fragilis* located approximately 1.8km northeast in 2013.

2.24 The habitats on site are largely unsuitable for reptiles, due to the intensively managed nature of the grassland and ruderal areas. As such the presence of significant numbers or reptiles is discounted with any present being within the hedgerows and overall the site is considered to be of **negligible importance** for this group.

Other species

2.25 DBRC holds a single record for hedgehog *Erinaceus europaeus* within the study area located approximately 0.9km west in 2016. Overall, the habitats present do have some potential to support this species and hedgehog may utilise the site on occasion. Whilst they are a declining species, if present, a population of hedgehog would be of no greater than **site ecological importance**.

2.26 DBRC holds several records for otter *Lutra lutra* associated with watercourses in the local area with the closest approximately 0.8km west in 1997. No suitable habitat for otter is present within or close to the site and overall they are not considered likely to be present.

2.27 No evidence of any other notable species has been recorded at the site and based on the habitats present, none are considered likely to be present.

Section 3: Potential Impacts, Mitigation and Enhancement

Proposals

3.1 The proposals for the site are for the creation of access and car parking for the occasional use of approximately 100 cars. To create this facility, a suitable ground surface would be installed comprising permeable and hard-wearing parking grid system with the topsoil backfilled and grass sown around the substrate. The site would also continue to be used as a helicopter landing pad on occasion.

3.2 The majority of the existing grassland habitat within the site will be lost to facilitate the proposals although areas of grassland will be retained where possible. Post-development the parking area will be oversown with a similar grassland mix which will largely replace the habitat lost and provide continued opportunities for biodiversity.

3.3 The proposals will not result in any impact to the most ecologically valuable habitat at the site, namely the hedgerows, with these to be fully retained and buffered from the proposed works. There are also opportunities to enhance the retained hedgerow to provide improved opportunities for biodiversity.

Potential Impacts and Requirement for Mitigation

3.4 Both the Countryside and Rights of Way (CRoW) Act 2000 and the Natural Environment and Rural Communities (NERC) Act 2006 gives the importance of conserving biodiversity a statutory basis, requiring government departments (which includes Local Planning Authorities) to have regard for biodiversity in carrying out their obligations (which includes determination of planning applications) and to take positive steps to further the conservation of listed species and habitats. These articles of legislation require East Devon District Council to take measures to protect species or habitats from the adverse effects of development, where appropriate, by using planning conditions or obligations.

3.5 Where there are potential impacts in the construction and/or operational phases of the development to the ecological resources described and evaluated in Section 2, these are described below. Where potential impacts would trigger legislation or planning policy (as set out in Appendix 1), the requirement for mitigation is noted.

Statutory Protected Sites

3.6 No statutory designated sites are located within or adjacent to the site boundary. The closest statutory designated site is the Exe Estuary SPA, Ramsar and SSSI, located approximately 0.7km west and is separated from the site by existing built development, roads and a railway. In addition, East Devon Heaths SPA and East Devon Pebblebed Heaths SAC is located approximately 3.4km east, and is separated from the site by agricultural land, roads and existing built development. Dawlish Warren SAC is also located approximately 5.8km south and is separated from the site by roads, railway, existing built development and the Exe estuary.

3.7 Standard construction safeguards will take place, such as those in relation to noise, vibration, dust and contaminated run-off. These measures will ensure no impacts occur to any adjacent habitats, protected sites in the study area or other off-site receptors.

3.8 Whilst no direct hydrological links are present between the site and any protected sites, construction would be undertaken in accordance with CIRIA good practice guidance (Charles, 2015), or similar, to protect adjacent habitats. Where appropriate, method statements would also be produced for high-risk activities, such as refuelling and use of concrete, where necessary.

3.9 Dust created during construction is generally considered to only have a significant impact within 20 metres where heavy soiling of vegetation can occur (Holman *et al*, 2014) and as such given the distances involved, dust is not considered to be a significant issue with regards to any of the protected sites within the study area. In addition, any protection measures to control run-off will also help to minimise airborne dust levels.

3.10 Any potential adverse effects from noise and vibration will be mitigated through standard engineering practice, adhering to current guidance and legislation, and given the distances involved no impacts as a result of noise or vibration will occur at any of these sites.

3.11 The proposals for the site are for the creation of overflow car parking to accommodate occasional users at the CTCRM. As such there is no possibility of the proposals contributing to increase recreational pressure on the protected sites in the local area and this impact pathway is therefore screened out of further assessment.

3.12 With the implementation measures detailed above, there would be no impacts either alone or in combination with any plans or projects as a consequence of the proposed development on any European or other designated site.

Impact Risk Zones

3.13 The site is located within the Impact Risk Zone (IRZ) for the Exe Estuary SSSI. However, the risk factors are identified on MAGIC as being for large residential development as well as infrastructure or other proposals which would result in large scale water discharges. As such the proposals for this site do not fall into any of the identified risk categories and no further consultation in this regard is required.

Non-statutory Protected Sites

3.14 The site is located in close proximity to six non-statutory sites, with the closest comprising The Brake UWS located approximately 0.5km east.

3.15 All of the non-statutory sites in the study area are separated from the site by existing built development and roads, and given the distances involved and the fact that no direct habitat links are present, the proposals for the site are not anticipated to have any adverse effects.

3.16 Overall, no impacts would occur to any adjacent habitats or protected sites in the local area and as such, the proposed development would be in line with relevant legislation and planning policy regarding protected sites.

Habitats and Flora

3.17 The design of the proposals would use the existing field for access and therefore avoid impacts and retain the most ecologically important habitat at the site, namely the hedgerows. Furthermore the site proposals would take place on habitats of limited ecological importance, namely the grassland and ruderal vegetation.

3.18 Whilst the proposals will require the loss of the majority of the existing modified amenity grassland in its current form, some areas will be retained on the margins. Once the parking grid is installed the excavated topsoil would be backfilled and oversown with a similar grassland mix to that currently present. Once established this grassland would be subject to similar management to that currently present and as such would largely replace the habitat lost providing continued opportunities for wildlife at the site.

3.19 Protective measures will be implemented during construction to prevent impacts occurring to retained hedgerows and offsite habitats. Such protection measures would include the provision of protective fencing in accordance with best practise guidance detailed in BS 5837:2012 'Trees in relation to design, demolition and construction' (British Standard, 2012) to reduce potential impacts and accidental damage.

3.20 Post-development there is also an opportunity to enhance the retained hedgerow H1. Such measures would include infill planting to achieve species rich status and sensitive management to promote the growth of dense woody vegetation maximising foraging opportunities for birds, invertebrates and a range of other wildlife.

3.21 Taken together the proposals for the site would compensate for any losses that occur and will assist with creating biodiversity gains post development in line with relevant adopted policy.

Fauna

Amphibians

3.22 Whilst the site is suboptimal for amphibians, the hedgerows could support small populations of common amphibians during their terrestrial phases, although no evidence of any amphibian has been recorded.

3.23 With the retention and buffering of the hedgerows, the majority of suitable habitat for amphibians would be unaffected and no impacts would occur. Whilst amphibians could utilise the ruderal vegetation this habitat is small in extent and poor in quality, nonetheless a precaution, prior to any clearance occurring any refugia piles would be checked and removed from site and with any amphibians moved to the adjacent hedgerow.

3.24 Post-development with the retention of hedgerows and replacement of the grassland at the site opportunities for amphibians will be maintained and overall no impacts to this faunal group would occur.

Badger

3.25 Whilst they are known to be present locally, no evidence of badger setts has been recorded within or adjacent to the site. Whilst the site does provide some opportunities for badger, these are common locally and overall badger would not be anticipated to rely upon the site for foraging or commuting.

3.26 As badgers are known to be present in the area, protection measures for badger will be undertaken prior to and during construction. Such measures will include briefing all contractors working on the site regarding the potential presence of badgers and any trenches or deep pits that could be required will be covered overnight or provided with a means of escape should a badger enter, such as a roughened plank of wood placed in the trench as a ramp to the surface. This will also avoid impacts to any other small or medium sized mammals.

3.27 The storage of topsoil or other 'soft' building materials on site should be given careful consideration if required. Badgers will readily adopt such mounds as setts, which would then be afforded the same protection as established setts. Such mounds will be regularly inspected to check for use by badgers throughout the construction period.

3.28 Post-development with the retention of hedgerows and replacement of the grassland at the site, opportunities for badgers for foraging and commuting will be maintained and with the adoption of protection measured during construction, overall no impact to this species would occur.

Bats

3.29 No bat roosts have been identified within the site and the majority of habitats are considered to be sub-optimal for bats comprising intensively managed grassland.

3.30 The proposals have been designed to retain and protect the habitats of greatest importance for bats, namely the boundary hedgerows and given the replacement of the majority of grassland, overall the site would continue to provide opportunities for foraging and commuting bats post development.

3.31 The opportunity to improve the structure and management of hedgerow H1 would help to enhance opportunities for bats by improving the quality of cover and connectivity as well as providing additional species which could support insect prey items.

3.32 Overall, it is considered that the proposals for the site would not result in any significant impacts to bats with the retention of habitats at the site providing continued opportunities for bats.

Breeding Birds

3.33 The majority of habitats are not suitable for breeding birds, however the hedgerows have some limited potential to support nesting birds. With the retention of areas of suitable habitat, namely hedgerows, no impacts to nesting birds should occur.

3.34 Whilst no loss of bird nesting habitat is anticipated, should any removal be required this should be undertaken outside of nesting bird season. All wild birds, their nests and eggs are afforded protection under the WCA 1981 (as amended). In order to avoid a breach in legislation any removal of suitable habitat should be undertaken outside of nesting season (generally accepted as March

to August inclusive, though this is not defined in law and birds can nest outside of these times). Should this not be possible a thorough search would need to be completed by a suitably qualified ecologist immediately prior to removal, to check for signs of active bird nests. If an active nest is found to be present, an appropriate buffer will need to be retained until the young have fledged and the nest is no longer active, as confirmed by an ecologist.

3.35 The opportunity to improve the structure and management of hedgerow H1 would help to enhance opportunities for birds by improving the quality of cover for nesting and connectivity as well as providing additional species which provide additional food sources such as berries.

3.36 Overall, it is considered that the measures detailed would maintain and improve nesting and foraging opportunities for birds, and no impacts would occur.

Invertebrates

3.37 The proposals retain the majority of the habitats of importance for invertebrates, namely the hedgerows, and with the replacement of the majority of grassland, opportunities for this group would be maintained.

3.38 The opportunity to improve the species diversity and structure of hedgerow H1 would help to enhance opportunities for invertebrates by providing additional host and food plants.

3.39 Overall, it is considered that the measures detailed would maintain and improve opportunities for invertebrates and no impacts would occur.

Reptiles

3.40 The majority of the site is not suitable for reptiles comprising intensively managed grassland. Whist some opportunities are present in the hedgerows these are small in scale and would not be impacted by the proposals and as such no impacts to reptiles are anticipated.

3.41 Should any impact to suitable reptile habitat be required, such as hedgerows, this would be completed under the supervision of an ecologist and during the reptile active season (March/April to September/October) and during suitable weather conditions - no heavy rain and temperature above 10°C, with habitat manipulation used to drive reptiles to retained suitable habitat. Refuge areas such as logs or stones will also be checked before the works commence, being removed and placed within the retained habitat. Any caught reptiles will also be moved to suitable retained habitat in the wider area. The hedgerow would then be grubbed out slowly using an excavator fitted with a toothed bucket.

3.42 Overall, it is considered that the measures detailed would maintain and improve opportunities for reptiles and no impacts would occur.

Other Species

3.43 Regard will be had for any other protected or notable species that may be present within the site and in particular hedgehog, a UK Priority Species, which could be affected during the construction phase, if present. Prior to any site clearance work, any obvious piles of leaves or brash will be cleared by hand and should any hedgehogs be found, they will be carefully moved to other areas of suitable habitat, away from the proposed development.

3.44 Post-development the retention of the hedgerows and replacement of grassland will maintain opportunities for **hedgehogs** at the site and overall no impacts to this species would occur.

Section 4: Conclusion

4.1 The site is not covered by any statutory protection, although a number of such sites are present locally. Measures will be implemented during construction to ensure that no impacts occur to any designated sites as a consequence of the proposals.

4.2 The site is of limited ecological importance being subject to regular disturbance and intensive management. Surveys of the site and adjacent habitats have nonetheless been completed following the standard guidelines, where considered necessary.

4.3 The site is considered to be of limited importance for bats, breeding birds and reptiles, with the majority of habitats intensively managed and providing few opportunities for these faunal groups. Whilst some species may be present in low numbers, the habitat of greatest importance, the hedgerows, are to be retained and no impacts are anticipated.

4.4 No evidence of badger setts was identified at the site although a badger push through was recorded suggesting this species does use the site on occasion.

4.5 Appropriate mitigation will be implemented to ensure no adverse impacts occur to any protected species as a result of the development.

4.6 The proposals include the retention and protection of the most ecologically important habitats on site, namely the hedgerows. The majority of the existing grassland habitat within the site will be lost to facilitate the proposals although areas of grassland will be retained where possible. Post-development the parking area will be over sown with a similar grassland mix which would replace the habitat lost and provide continued opportunities for the species anticipated to use the site.

4.7 With the implementation of the mitigation and enhancement strategy described above, the proposed development would be in conformity with relevant planning policy and legislation (see Appendix 1).

References

Butcher, B. Carey, P. Edmonds, R. Norton, L. and Treweek, J. (2020) UK Habitat Classification – Habitat Definitions V1.1

Charles, P (2015) Environmental good practice on site guide (fourth edition) C741, CIRIA, London

CIEEM (2019) Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater and Coastal, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester

DEFRA (2007). Hedgerow Survey Handbook. A standard procedure for local surveys in the UK. DEFRA, London.

Holman *et al* (2014). IAQM (Institute of Air Quality Management) Guidance on the assessment of dust from demolition and construction, Institute of Air Quality Management, London. www.iaqm.co.uk/ text/guidance/construction-dust-2014.pdf.

Joint Nature Conservation Committee (2010). *Handbook for Phase 1 habitat survey - a technique for environmental audit.* JNCC (Joint Nature Conservation Committee), Peterborough

Master-Williams H et al (2001) *Control of water pollution from construction sites. Guidance for consultants and contractors (C532),* CIRIA (Construction Industry Research and Information Association).

Mitchell-Jones A. (2004) Bat Mitigation Guidelines. Natural England.

Mitchell-Jones, A. J. and McLeish, A. P. (2004) Bat Workers' Manual (3rd edn). JNCC

Multi-Agency Geographic Information for the Countryside (MAGIC) Interactive maps, available online at: https://magic.defra.gov.uk/MagicMap.aspx

Natural Devon (2016) Devon Great crested newt consultation zones; Guidance for planning.

RSPB (2017) Survey methodology to establish presence of cirl bunting on a site. RSPB South West England Regional Office, Exeter.

Appendix 1: Legislation and Planning Policy

A1.1 Specific habitats and species receive legal protection in the UK under various pieces of legislation, including:

- The Wildlife and Countryside Act (WCA) 1981 (as amended);
- The Conservation of Habitats and Species Regulations 2019 (as amended);
- The Countryside and Rights of Way (CRoW) Act 2000;
- The Hedgerows Regulations 1997;
- The Protection of Badgers Act 1992; and
- The Natural Environment and Rural Communities Act (NERC) 2006.

A1.2 The European Council Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna, 1992, often referred to as the 'Habitats Directive', provides for the protection of key habitats and species considered of European importance. Annexes II and IV of the Directive list all species considered of community interest. The legal framework to protect the species covered by the Habitats Directive has been enacted under UK law through The Conservation of Habitats and Species Regulations 2017 (as amended).

A1.3 In Britain, the WCA 1981 (as amended) is the primary legislation protecting habitats and species. SSSIs, representing the best examples of our natural heritage, are notified under the WCA 1981 (as amended) by reason of their flora, fauna, geology or other features. All breeding birds, their nests, eggs and young are protected under the Act, which makes it illegal to knowingly destroy or disturb the nest site during nesting season. Schedules 1, 5 and 8 afford protection to individual birds, other animals and plants.

A1.4 The CRoW Act 2000 strengthens the species enforcement provisions of the WCA 1981 (as amended) and makes it an offence to 'recklessly' disturb a protected animal whilst it is using a place of rest or shelter or breeding/nest site.

Species and Habitats of Principal Importance and the UK Biodiversity Action Plan

A1.5 The UK Post-2010 Biodiversity Framework succeeded the UK BAP (Biodiversity Action Plan) partnership in 2011 and covers the period 2011 to 2020. However, the lists of Priority Species and Habitats agreed under the UKBAP (UK Biodiversity Action Plan) still form the basis of much biodiversity work in the UK. The current strategy for England is 'Biodiversity 2020: A Strategy for England's wildlife and ecosystem services' published under the UK Post-2010 UK Biodiversity Framework. Although the UK BAP has been succeeded, Species Action Plans (SAPs) developed for the UK BAP remain valuable resources for background information on priority species under the UK Post-2010 Biodiversity Framework.

A1.6 Priority Species and Habitats identified under the UKBAP are also referred to as Species and Habitats of Principal Importance for the conservation of biodiversity in England and Wales within Sections 41 (England) and 42 (Wales) of the Natural Environment and Rural Communities (NERC)

Act 2006. The commitment to preserving, restoring or enhancing biodiversity is further emphasised for England and Wales in Section 40 of the NERC Act 2006.

National Planning Policy

National Planning Policy Framework (NPPF), July 2021

A1.7 The National Planning Policy Framework (NPPF) was published in July 2021 and sets out the Government's planning policies for England and how these should be applied. It replaces the National Planning Policy Framework published in February 2019.

A1.8 Paragraph 11 states that:

"Plans and decisions should apply a presumption in favour of sustainable development."

A1.9 Section 15 of the NPPF (paragraphs 174 to 188) considers the conservation and enhancement of the natural environment.

A1.10 Paragraph 174 states that planning and decisions should contribute to and enhance the natural and local environment by:

a) "protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures"

A1.11 Paragraph 175 states that plans should distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

A1.12 Paragraph 179 states that in order to protect and enhance biodiversity and geodiversity, plans should:

a) "Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and steppingstones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity."

A1.13 When determining planning applications, Paragraph 180 states that local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

a) "if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c) 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 reasons58 and a suitable compensation strategy exists; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity."

A1.14 As stated in paragraph 181 the following should be given the same protection as habitats sites:

a) "potential Special Protection Areas and possible Special Areas of Conservation;

b) listed or proposed Ramsar sites; and

c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites."

A1.15 Paragraph 182 states that the presumption in favour of sustainable development does not apply where development requiring appropriate assessment because of its potential impact on a habitats site is being planned or determined.

A1.16 Office of the Deputy Prime Minister (ODPM) Circular 06/2005: Biodiversity and Geological Conservation - Statutory Obligations and their Impact within the Planning System

A1.17 ODPM Circular 06/05 was prepared to accompany PPS9 (Planning Policy Statement 9), however continues to be valid, and material in the consideration of planning applications since PPS9's replacement by the NPPF.

A1.18 ODPM Circular 06/05 provides guidance on applying legislation in relation to nature conservation and planning in England. Part I considers the legal protection and conservation of internationally designated sites (namely candidate Special Areas of Conservation (cSACs), SACs (Special Area of Conservation), potential Special Protection Areas (pSPAs), SPAs (Special Protection Area) (Special Protection Area) and Ramsar sites) and Part II considers the legal protection and conservation of nationally designated sites, namely Sites of Special Scientific Interest (SSSIs).

A1.19 Part III considers the protection of habitats and species outside of designated areas (particularly UK Biodiversity Action Plan species and habitats, which it states are capable of being a material consideration in the preparation of local development documents and the making of planning decisions.

A1.20 Part IV considers species protected by law and states that the presence of a protected species is a material consideration in the consideration of a development proposal that, if carried out, would be likely to result in harm to the species or its habitat and that it is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted.

Local Planning Policy

A1.21 The Site is wholly located within the area of East Devon District Council. Planning policy for East Devon is detailed within the East Devon Local Plan 2013 to 2031 which was adopted on 28 January 2016.

A1.22 Within the East Devon Local Plan the following strategic polices are relevant to ecology at the site.

Strategy 5 – Environment

A1.23 All development proposals will contribute to the delivery of sustainable development, ensure conservation and enhancement of natural historic and built environmental assets, promote ecosystem services and green infrastructure and geodiversity.

A1.24 Open spaces and areas of biodiversity importance and interest (including internationally, nationally and locally designated sites and also areas otherwise of value) will be protected from damage, and the restoration, enhancement, expansion and linking of these areas to create green networks will be encouraged through a combination of measures to include;

1. Maximising opportunities for the creation of green infrastructure and networks in sites allocated for development;
2. Creating green networks and corridors to link the urban areas and wider countryside to enable access by all potential users;
3. The designation of Local Nature Reserves and County Wildlife Sites;
4. Minimising the fragmentation of habitats, creation of new habitats and connection of existing areas to create an ecological network that is identified within the East Devon District Council Local Biodiversity Plan;
5. Progress towards delivering the Biodiversity Action Plan targets and Local Nature Reserve Strategy;
6. Conservation and enhancement of Sites of Special Scientific Interest (SSSI) in accordance with the Wildlife and Countryside Act. and other statutory and non-statutory nature conservation and wildlife sites and areas of value;
7. Making use of and protecting from development areas that are vulnerable to surface water runoff and flooding.

8. Working in partnership with neighbouring authorities to implement a consistent and strategic approach to the protection and enhancement of the highest tier of wildlife sites.

A1.25 New development will incorporate open space and high quality landscaping to provide attractive and desirable natural and built environments for new occupants and wildlife. It will contribute to a network of green spaces and ensure potential adverse impacts on the Exe Estuary and East Devon Pebblebed Heaths European wildlife sites are appropriately mitigated against. Where there is no conflict with biodiversity interests, the enjoyment and use of the natural environment will be encouraged and all proposals should seek to encourage public access to the countryside.

Strategy 38 - Sustainable Design and Construction

A1.26 Encouragement is given for proposals for new development and for refurbishment of, conversion or extensions to, existing buildings to demonstrate through a Design and Access Statement how:

a) sustainable design and construction methods will be incorporated, specifically, through the re-use of material derived from excavation and demolition, use of renewable energy technology, landform, layout, building orientation, massing, use of local materials and landscaping;

b) the development will be resilient to the impacts of climate change;

c) potential adverse impacts, such as noise, smell, dust, arising from developments, both during and after construction, are to be mitigated.

d) biodiversity improvements are to be incorporated. This could include measures such as integrated bat and owl boxes, native planting or green roofs.

A1.27 Until the adoption of nationally prescribed standards, developments of 10 or more dwellings or 1,000m^2 of commercial floor space should be assessed using the CSH or BREEAM (Building Research Establishment Environmental Assessment Method), with housing developments meeting at least CSH Level 4 from 2013 and other uses BREEAM of at least 'Very Good'.

A1.28 Due to their scale, developments in the West End and developments over 4 ha or 200 dwellings elsewhere in East Devon should achieve levels of sustainability in advance of those set out nationally. The Council will wish to see homes built to Code for Sustainable Homes Level 4 and this will be a material consideration. Proposals for water harvesting and sustainable waste management will be encouraged. In building refurbishments the Council will encourage and promote the integration of renewable energy into existing buildings.

Strategy 47 - Nature Conservation and Geology

A1.29 All development proposals will need to:

1. Conserve the biodiversity and geodiversity value of land and buildings and minimise fragmentation of habitats.

2. Maximise opportunities for restoration, enhancement and connection of natural habitats.

3. Incorporate beneficial biodiversity conservation features.

A1.30 Development proposals that would cause a direct or indirect adverse effect upon internationally and nationally designated sites will not be permitted unless:

a) They cannot be located on alternative sites that would cause less or no harm.

b) The public benefits of the development clearly outweigh the impacts on the features of the site and the wider network of natural habitats.

c) Prevention, mitigation and compensation measures are provided.

d) In respect of Internationally designated sites, the integrity of the site will be maintained.

A1.31 Development proposals where the principal objective is to conserve or enhance biodiversity or geodiversity interests will be supported in principle.

A1.32 Where there is reason to suspect the presence of protected species applications should be accompanied by a survey assessing their presence and, if present, the proposal must be sensitive to, and make provision for, their needs.

D3 - Trees and Development Sites

A1.33 Permission will only be granted for development, where appropriate tree retention and/or planting is proposed in conjunction with the proposed nearby construction. The council will seek to ensure, subject to detailed design considerations, that there is no net loss in the quality of trees or hedgerows resulting from an approved development. The development should deliver a harmonious and sustainable relationship between structures and trees. The recommendations of British Standard 5837:2012 (or the current revision) will be taken fully into account in addressing development proposals.

A1.34 No building, hard surfacing drainage or underground works will be permitted that does not accord with the principles of BS (British Standard) 5837 or Volume 4 National Joint Utilities Group (NJUG) Guidelines for the Planning, Installation and Maintenance of Utility Apparatus in Proximity to Trees – Issue 2 (or the current revision or any replacement) unless, exceptionally, the Council is satisfied that such works can be accommodated without harm to the trees concerned or there are overriding reasons for development to proceed.

A1.35 The Council will as a condition of any planning permission granted, require details as to how trees, hedges and hedge banks will be protected prior to and during and after construction. The Council will protect existing trees and trees planted in accordance with approved landscaping schemes through the making of Tree Preservation Orders where appropriate or necessary.

A1.36 Planning permission will be refused for development resulting in the loss or deterioration of ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.

EN4 - Protection of Local Nature Reserves, County Wildlife Sites and County Geological Sites

A1.37 Development or land-use changes likely to have an adverse effect, either directly or indirectly, on:

1. Local Nature Reserves.

2. County Wildlife Sites.

3. County Geological Sites.

A1.38 either as identified on the Proposals Map in the Local Plan or otherwise existing in the plan area will only be permitted if the justification for the proposals clearly outweighs any harm to the intrinsic nature conservation and/or scientific value of the site.

A1.39 Where development is permitted on such sites mitigation will be required to reduce the negative impacts and where this is not possible adequate compensatory habitat enhancement or creation schemes will be required and/or measures required to be taken to ensure that the impacts of the development on valued natural features and wildlife have been mitigated to their fullest practical extent.

EN5 - Wildlife Habitats and Features

A1.40 Wherever possible sites supporting important wildlife habitats or features not otherwise protected by policies will be protected from development proposals which would result in the loss of or damage to their nature conservation value, particularly where these form a link between or buffer to designated wildlife sites. Where potential arises positive opportunities for habitat creation will be encouraged through the development process.

A1.41 Where development is permitted on such sites mitigation will be required to reduce the negative impacts and where this is not possible adequate compensatory habitat enhancement or creation schemes will be required and/or measures required to be taken to ensure that the impacts of the development on valued natural features and wildlife have been mitigated to their fullest practical extent.

Appendix 2: Survey Methodology

Data Search

A2.1 The aim of the data search is to collate existing ecological records for the site and adjacent areas. Obtaining existing records is an important part of the assessment process as it provides information on issues that may not be apparent during a single survey, which by its nature provides only a 'snapshot' of the ecology of a given site.

A2.2 This data search covered the study area using the distances defined in the previous section. It was completed in October 2022 with the following organisations and resources contacted and consulted:

- Devon Biodiversity Records Centre (DBRC);
- Multi-Agency Geographic Information for the Countryside (MAGIC) Interactive Maps, for locations of statutory sites;
- Section 41 of the Natural Environment and Rural Communities (NERC) Act for Priority Species and habitats in England; and
- East Devon District Council website for details of relevant local planning policies and supplementary planning guidance.

A2.3 Information supplied by these organisations has where relevant, been incorporated into the following report.

Extended Phase I Survey

A2.4 An extended Phase I habitat survey of the site was undertaken in August 2022. The habitat survey methodology was based on guidance set out in the 'Handbook for Phase 1 habitat survey' (JNCC, 2010) and entailed recording the main plant species and classifying and mapping habitat types with reference to the Habitat Definitions provided by the UK Habitat Classification Working Group (2018).

A2.5 Note was taken of the more conspicuous fauna and any evidence of, or potential for the presence of protected or notable flora and fauna. Where access allowed, adjacent habitats were also considered in order to assess the site within the wider landscape and to provide information with which to assess possible impacts within the context of the site boundary.

A2.6 An initial badger survey across the site and within adjacent habitats was also undertaken by Tyler Grange during the Phase 1 survey in August 2022. This comprised two main elements. The first of these was a thorough search for evidence of badger setts. If any setts were encountered each sett entrance was noted and plotted even if the entrance appeared disused.

A2.7 Secondly, badger activity such as well-worn paths and run-throughs, snagged hair, footprints, latrines and foraging signs was recorded so as to build up a picture of the use of the site, if any, by badgers.

Evaluation

A2.8 The evaluation of habitats and species is defined in accordance with published guidance (CIEEM, 2019). The level of importance of specific ecological features is assigned using a geographic frame of reference, with international being most important, then national, regional, county, borough, local and lastly, within the site boundary only.

A2.9 Evaluation is based on various characteristics that can be used to identify ecological features likely to be important in terms of biodiversity. These include site designations (such as Sites of Species Scientific Interest (SSSIs)), or for undesignated features, the size, conservation status (locally, nationally, or internationally), and the quality of the ecological feature. In terms of the latter, quality can refer to habitats (for instance if they are particularly diverse, or a good example of a specific habitat type), other features (such as wildlife corridors or mosaics of habitats) or species populations or assemblages.

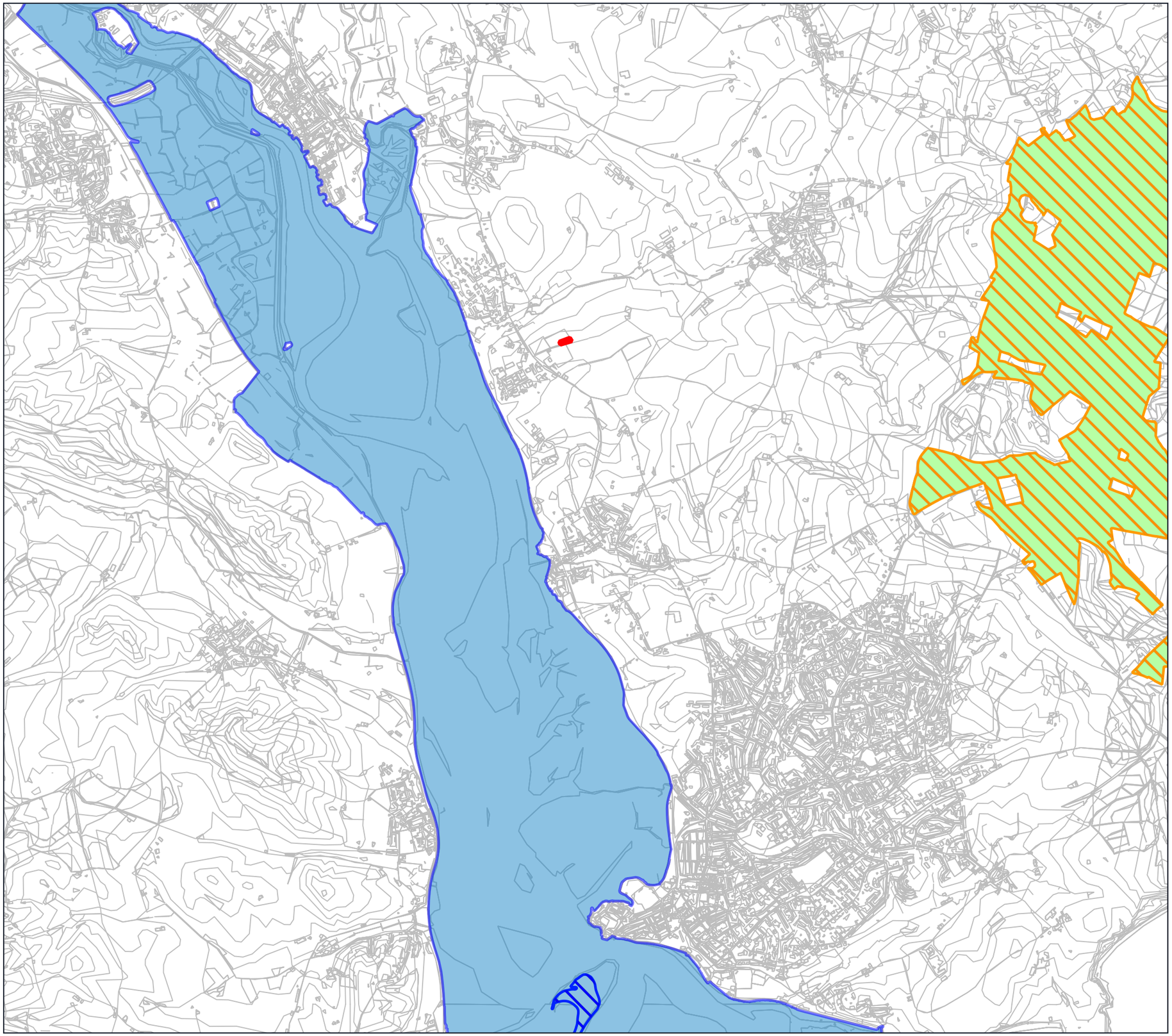
Limitations

A2.10 The species data collated during the data search are only those records submitted to DBRC and therefore should not be taken as a definitive list of the protected and priority fauna to occur within the study area.

Plans:

15017/P01: Site Location and Location of European Protected Sites

15017/P02: Habitat Features



Site boundary

Exe Estuary SPA and Ramsar

East Devon Heaths SPA and East Devon Pebblebed Heaths SAC

Dawlish Warren SAC

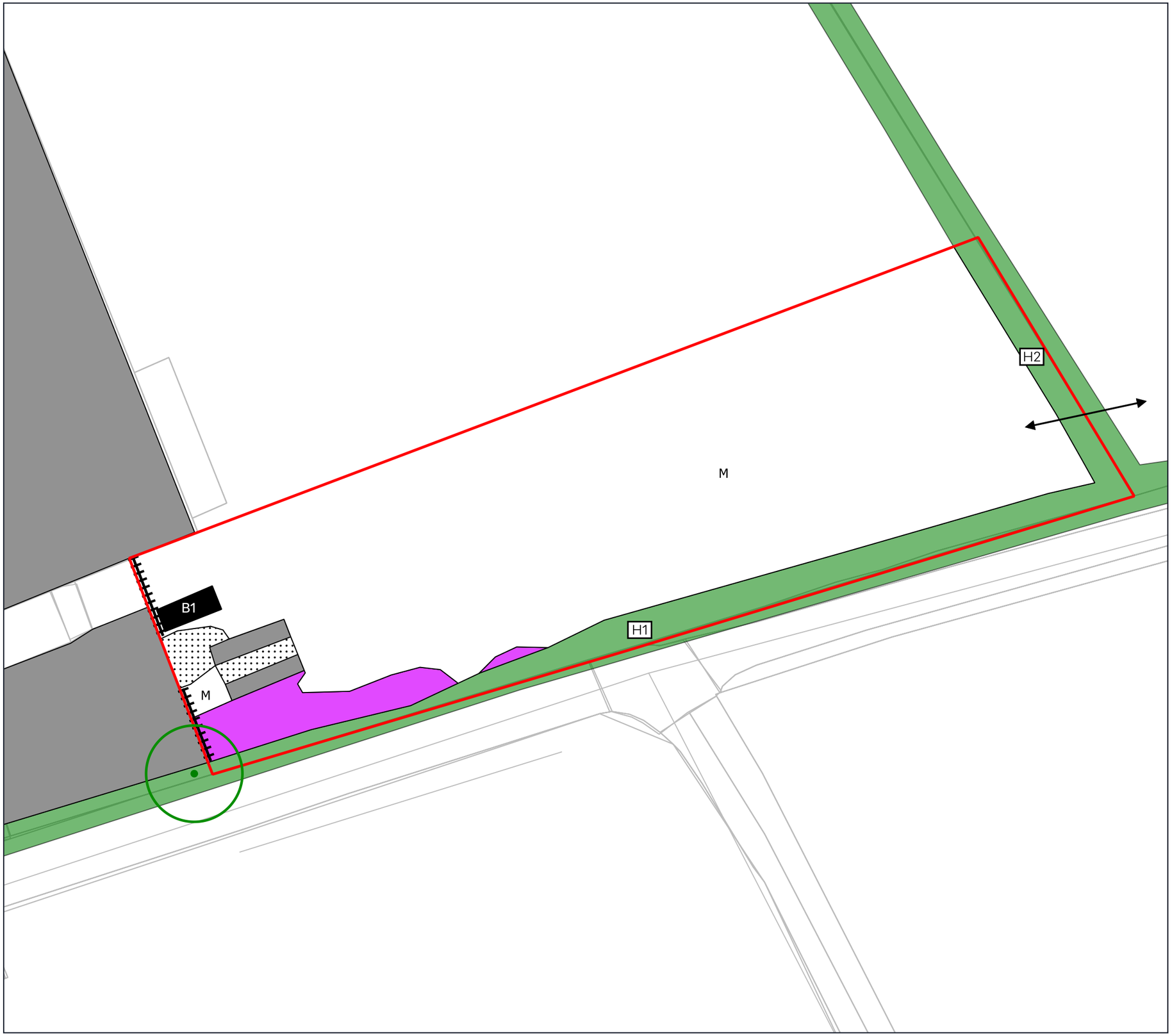
N

0 1 km

Project	Emergency/Overspill Carpark - CTCRM Lympstone
Drawing Title	Site Location and Location of European Protected Sites
Scale	As Shown (Approximate)
Drawing No.	15017/P01
Date	October 2022
Checked	AH/RC

Tyler Grange

The Gallery, Kings Wharf, The Quay, Exeter, EX2 4AN
T: 01285 851 804 E: info@tylergrange.co.uk W: www.tylergrange.co.uk



- Site boundary
- Bare ground
- Building
- Hardstanding
- M — Modified grassland
- Ruderal vegetation
- Hedgerows (with label)
- Fence
- Badger push through
- Mature tree (offsite)

N

0 10 m

Project	Emergency/Overspill Carpark - CTCRM Lympstone
Drawing Title	Habitat Features
Scale	As Shown (Approximate)
Drawing No.	15017/P02
Date	October 2022
Checked	AH/RC

Tyler Grange

The Gallery, Kings Wharf, The Quay, Exeter, EX2 4AN
T: 01285 831 804 E: info@tylergrange.co.uk W: www.tylergrange.co.uk

Tyler Grange

Landscape | Ecology | Arboriculture