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Our ref: 10973/OGJ

Peter Lee
Tandridge District Council

5th February 2024

Dear Peter

NUTFIELD GREEN PARK – SURREY WILDLIFE TRUST FURTHER INFORMATION RESPONSE

This letter has been prepared by FPCR Environment and Design on behalf of Nutfield Park Developments Ltd (NPD) regarding the proposed development at Nutfield Green Park, The Former Laporte Works, Nutfield Road, Nutfield, Surrey (planning ref: 2023/1281). Following submission, the Surrey Wildlife Trust (SWT) were invited to the Site by the applicant (NPD) and a follow-up meeting with FPCR ecologists to discuss the proposals. During these meetings, a number of further information requests were provided which have since been presented to Tandridge District Council (TDC) as part of SWT's role as a statutory consultee (SWT letter reference: 305509/001/RH).

This letter report has been prepared to respond to each of the further information requests presented by SWT. For ease of reference, the key comments from SWT have been copied into this letter and responded to directly in the subsequent text.

<u>Protected Sites – Statutory</u>
During their response, SWT provided the following comment:

"*Given the presence of these statutory designated sites, that Natural England is consulted prior to determination, on the potential operational impact of the proposal, prior to determination.*"

Our assessment on the likelihood of any impacts on statutory designated sites is presented in the Ecological Impact Assessment (EcIA) report submitted as part of the application. It was considered that the proposals would lead to a negligible impact on statutory designated sites within the search area considered due to the intervening distance between Nutfield Green Park and the designated sites considered, the relatively small scale of the proposals and the mitigation inherent in the design of the proposals which will provide ample alternative greenspace for residents to result in negligible likelihood of residents using nearby SSSIs or SACs. Natural England have since commented on the application and are in agreement with FPCR's assessment that there will be no effect on statutory designated sites of internationally importance.

Protected Sites – Non-Statutory
During their response, SWT provided the following comment:

"*The LPA should require the applicant to critically assess the construction phase of the application against the criterion of the Holmethorpe Sandpits Complex Site of Nature Conservation Importance, and put forward the impact assessment and mitigation strategy, prior to determination. If this is not submitted, then there is insufficient information for us to advise the LPA that there will not be an adverse impact upon Holmethorpe Sandpits Complex Site of Nature Conservation Importance during the construction phase of the application."*

During the EcIA prepared to support the scheme, an assessment was made for the likelihood of the proposals to impact on the Holmethorpe Sandpits Complex Site of Nature Conservation Importance (SNCI). It was considered that in the absence of mitigation measures, the proposals could have a Not Significant Negative Effect at a County Scale as a result of direct habitat loss. This SNCI is designated to be of county value due to "*Lagoons, ruderal communities, marsh, willow carr, rank grassland. Selected as being of county importance for birds both as foraging and breeding site*." The majority of these habitats within the Site are to be retained and enhanced as part of the proposals, including over 85% of the total Site boundary.

The habitats currently present within the green infrastructure proposals largely include species-poor pasture grassland, large areas of self-set woodland that are densely crowded supporting limited ground flora, large ponds with densely overgrown banksides and areas of dense mixed scrub. These areas all provide significant opportunities for enhancement which have been explored and included within the proposals. Grasslands are to be enhanced into more species-rich meadows while retained woodlands and scrub will be subject to a range of enhancements including selective thinning, introduction of additional large deadwood and supplementary planting where appropriate. The ponds will also be enhanced by selectively clearing banksides, allowing marginal vegetation to establish. In addition, the central pond that only holds water temporarily will be enhanced through drainage proposals to retain water throughout the year, providing opportunities for marginal, emergent and wetland vegetation to establish and providing foraging and/or breeding habitat for a range of faunal species. Additional habitat present within proposed GI areas include better quality woodlands which are to be retained.

In addition, a range of new habitats will be created on areas of existing species-poor grassland. These will include ponds, swales, additional woodland and large areas of good condition mixed scrub which will directly benefit foraging and breeding opportunities for birds which form the primary reason for the SNCI designation. In particular additional scrub habitats will provide an overall increase in high quality breeding and foraging habitat for nightingale, which are scarce breeding species in Surrey.

The range of enhancement provided will lead to a positive effect on the SNCI by enhancing an area in excess of 50ha on the SNCI. The enhancements proposed will more than adequately compensate for the losses of habitats anticipated which are largely proposed to include areas of species-poor rank grassland, areas that have become dominated by bramble scrub and areas of poor quality, densely crowded self-set willow and silver birch woodland.

As part of a reserved matters application, a Construction and Environmental Management Plan (CEMP) will be provided to provide a range of best practice working measures to reduce the scale of impacts associated with the construction phase. This document can be secured through condition. In addition, it is important to note that habitat creation and enhancement measures will be delivered alongside the commencement of works and so the enhancements will begin from to start of works. During the establishment period for the habitats, there will be an overall reduction in the availability of some habitats including woodland, however ponds, grassland and scrub habitats will establish relatively quickly and so this overall reduction in breeding and foraging habitats for birds will only be

a short-term effect as stated in our EcIA report. In the mid-long-term however, there will be an overall positive effect on the SNCI which will compensate for the short-term, not significant negative effects anticipated.

SWT also provided the following comment in relation to non-statutory designated sites:
"The LPA should require the applicant to critically assess the operational phase of the application against the criterion of the Holmethorpe Sandpits Complex Site of Nature Conservation Importance, and put forward the impact assessment and mitigation strategy, prior to determination. If this is not submitted, then there is insufficient information for us to advise the LPA that there will not be an adverse impact upon Holmethorpe Sandpits Complex Site of Nature Conservation Importance during the operational phase of the application."

The proposals include the provision of new footpaths that have been sensitively designed alongside habitat creation measures to reduce the disturbance of retained, enhanced and created habitats for birds species recorded onsite, particularly nightingale. Extensive new scrub habitats will be managed to create sheltered glades, rides and clearings throughout that will not be accessible from footpaths. These will provide optimal breeding habitats for a range of species, including nightingales. Additional pond habitats have also been situated alongside scrub habitats to provide a barrier from visitor access to the edges of scrub, providing additional sheltered breeding habitats for nightingale and other generalist/woodland edge bird species.

As they establish and mature, additional woodland planting will create further areas of breeding habitat for woodland/woodland edge specialists onsite, including the spotted flycatchers recorded. The enhancement of retained woodland and scrub habitats will further benefit the majority of bird species recorded onsite. Species rich grasslands will provide additional foraging habitats for a range of birds as well as other protected/notable species/groups such as bats, badgers, great crested newts, reptiles and invertebrates. A range of specific faunal enhancement have also been proposed including bat boxes, bird boxes and features for invertebrates and herptiles.

As part of the Reserved Matters (RM) application, a Habitat Management and Monitoring Plan (HMMP will be provided to detail how additional habitats will be created and how retained habitats will be enhanced. This will also include an Ecological Mitigation Enhancement Plan which will include prescriptions to deliver the specific faunal features as well as providing other measures deemed appropriate such as the provision of interpretation boards to inform residents of the sites value for biodiversity. The delivery of this HMMP and associated EMEP will be secured through a planning application once permission is granted.

It is therefore considered that the proposals will lead to long-term benefits for the important ecological features identified as a result of the extensive habitat creation and enhancement works proposed. The sensitive design of footpaths will ensure that the operational uses of the site will not significantly effect these benefits.

Biodiversity Opportunity Area WG11: Holmesdale
During their response, SWT provided the following comment:

"We would advise that prior to determination, the LPA requests clarification on how the proposal has been designed in line with the framework and targets of the BOA WG11."

And SWT go on to say:

"…*Therefore, as part of the request on this BOA, we would advise that the LPA requests specific analysis of how the loss of good quality lowland mixed deciduous woodland for an internal road, complies with this target."*

To address the latter point first, it should be reiterated that given the sensitive nature of the site, Ecology and Biodiversity were key elements of the project design that were considered from the outset. The layout of the proposed link road was only decided following extensive surveys of the woodlands across the Site, but particularly the central woodland compartment through which the link road is proposed. The majority of this woodland is represented by self-set willow and silver birch woodland that has formed on a now disused and dried-up lagoon as part of previous quarry works on the Site. The woodland is overcrowded, with limited ground flora and a general lack of a good woodland storey structure, lacking a distinct understorey and more mature canopy trees. Therefore, it is considered a poor example of lowland mixed deciduous woodland.

Better examples of priority habitat woodland are present to the south of the central woodland compartment and the road layout has been carefully designed to avoid areas of this good condition woodland, including groundworks areas required for construction. Therefore, contrary to SWT's review statement, there will be no loss of good condition lowland mixed deciduous woodland as a result of the proposals. Indeed, the proposals include the enhancement of the existing areas of the majority of retained lowland mixed deciduous woodlands that aren't already in good condition (and other woodland types across the site) through a HMMP that will be secured for a minimum 30-year period. In addition, the proposals include the creation of additional areas of lowland mixed deciduous woodland that will also be managed for a minimum period of 30-years. The area of woodland proposed is sufficient to demonstrate that the proposals will lead to no net loss in the total area of of priority woodland habitat and the BNG assessment completed for the Site has demonstrated that there will be no loss in priority habitat units as demonstrated by the trading rules for the metric being satisfied. Securing the proposals with a HMMP will therefore lead to an overall enhancement of the priority woodland habitats across the Site in the long-term.

The new road will retain adjacent woodland habitats and these will be entered into the minimum 30 year management period where the focus in this area will be to maintain arboreal connectivity by allow mature canopies to grow over the road. The RM application will also be accompanied by sensitive lighting strategy which will recommend measures such as low-level directional lighting and restricting lighting for an agreed period each night to ensure that ecological connectivity across the woodland for bats is maintained. The road is anticipated to see low levels of traffic due to its main function of linking the proposed retirement community to the A25 and the likelihood of road collisions affecting ecological connectivity will therefore be negligible.

Furthermore, the proposals provide significant opportunities to contribute to the targets of the Holmesdale Biodiversity opportunity area. Additional wetland will be provided through the creation of a series of new ponds which will be linked to existing pond through a series of naturalised scrapes. Pond P3 will also be enhanced to create additional areas of permanently wet pond habitats; currently it dries annually, and site drainage proposals have therefore been designed to encourage this feature to hold water throughout the year. These new pond features will provide additional breeding habitat for species such as reed bunting, with adjacent proposed enhanced grassland and new scrub habitats providing excellent foraging and breeding opportunities that could encourage this species to breed onsite.

Ancient and Veteran Trees
During their response, SWT provided the following comment in relation to trees:

"… However, given this prior consultation history, we would advise that the LPA request confirmation on whether veteran trees are absent from the application site, prior to determination."

An Arboricultural Assessment was undertaken by FPCR Environment and Design Ltd in accordance with guidance contained within British Standard 5837:2012 'Trees in Relation to Design, Demolition and Construction - Recommendations'.

The arboricultural information gathered on site was carried out in several stages during 2022 and supported the site wide design from its inception. Both a high level and fine scale tree survey has been carried out at Nutfield Green Park to establish developable areas within and around the majority of the tree cover on site. Part of the survey methodology was to assess if there were any trees on site that met the criterion of veteran status. This was based on the definition within BS5837 "Trees that, by recognized criteria, shows features of biological, cultural or aesthetic value that are characteristic of, but not exclusive to, individuals surviving beyond the typical age range for the species concerned".

There were no trees at Nutfield Green Park that met the above definition of a veteran tree as part of the Arboricultural Assessment

Bats
During their response, SWT provided the following comment in relation to bats:

"In the EcIA, FPCR appears to have scoped in four trees as being impacted, therefore this may not be a significant limitation, however, it does represent differing information, which should be clarified, prior to determination.

We would advise that if the LPA grants the planning application that an update bat survey condition is part of the approval. We would advise that the scope of the condition includes:

- *Update bat preliminary ground level tree roost assessment.*
- *Bat presence/likely absence surveys of trees, as required.*
- *A suitably qualified and experienced ecologist to review whether update bat activity surveys are required.*
- *Final and Detailed Bat Impact Assessment and Mitigation Strategy.*

We would advise that this condition is secured due to the potential for trees to change over time between 2022 and the start of the development works and because bats are known to regularly switch tree roosts. The update bat survey programme would ensure that detailed design is informed by update and accurate bat survey information."

FPCR are in agreement with SWT's recommendation that updated bats surveys would be required to inform a RM application should planned construction operations be undertaken beyond 2 years from the 2022 surveys. In the first instance, this would include an updated walkover survey by a suitably qualified and experienced ecologist to review what level of additional surveys would be required, if any, as a result of any changes in habitats onsite since the EcIA assessment. This would also include an updated assessment of the suitability of any trees to support roosting bats.

Birds
During their response, SWT provided the following comment in relation to birds:

"*We would advise that if the planning application is granted, then a Bird Mitigation and Enhancement Strategy is secured through a planning condition which is prepared by a suitably qualified and experienced ecologist prior to commencement."*

As stated in our EcIA report, a RM application would be supported by a HMMP with an appended EMEP. This EMEP will detail specific measures to enhance the site for birds and will therefore be sufficient to address the recommended planning condition suggested by SWT.

In relation to the Bird Stike Hazard Management Plan, SWT go on to say:

"*We would advise that the LPA seek clarification that this recommendation has consideration for the Holmethorpe Sandpits Complex Site of Nature Conservation Importance, prior to determination."*

The design of habitat creation and enhancement measures was strongly influenced by ecological recommendations at an early stage of scheme design. This sought to balance the aims of green infrastructure proposals to meaningfully enhance the Site for birds in accordance with a desire to enhance the Holmethorpe Sandpits Complex SNCI, while ensuring that the proposals would not lead to an increase in birdstrike risk at Gatwick Airport. Consequently, habitat creation, enhancement and management aims have targeted producing high quality habitat for the generalist, woodland and woodland edge bird assemblage recorded as these largely comprise species that are of a lower risk of causing birdstrikes.

In particular, enhancement measures will seek to improve the site for nightingale, which is a scarce breeding species in Surrey. This is considered to be the most appropriate species to target increasing the availability of breeding habitat for as it is declining species in England and it relies on scrub habitats that are not often maintained in the long-term. Scrub habitat is to be created onsite. Such scrub habitats also provide good breeding opportunities for a range of generalist and woodland edge species recorded, particularly as they will form a mosaic with foraging opportunities in enhanced grassland and woodland habitats. By securing the management of the site for a minimum of 30 years in accordance with Defra's forthcoming BNG requirements, this will facilitate the proposals resulting in long-term beneficial impacts for birds, which are the main qualifying feature of the Holmethorpe Sandpits Complex SNCI.

Badgers
During their response, SWT provided the following comment in relation to badgers:

"*We advise that the LPA request clarification on why no camera monitoring of setts has been carried out to inform the impact assessment. For example, what is the evidence that Sett S5 is not a main sett given the presence of three well-used holes, clear of vegetation with trampled soil outside the entrance holes. Additionally, we would advise that the LPA seek clarification on why no update badger survey was carried out in 2023 to provide update information with the planning application. We would advise that the LPA seek clarification on the classification of the setts on the application site, especially Annexe."*

The sets identified onsite were classified as annexe setts in accordance with descriptions provided by Cresswell, et al's Surveying Badgers[1]. The setts identified onsite were all small and/or consisted of partially used/disused holes. None were considered to display a level of activity consistent with a main badger sett as detailed in the Badger Report submitted with the application.

It is important to reiterate the recommendations provided in the Badger report and EcIA include completing a pre-commencement badger survey within 6-months of the construction operations. This survey would inform a Natural England licence application to facilitate any sett closure necessary to prevent any breaches in legislation. Should the survey identify any setts are being used by the badgers as a main sett, appropriate mitigation will be put in place such as the provision of an artificial sett. There are ample opportunities to provide an artificial sett in an optimal location across the site due to the significant habitat creation and enhancement measurements proposed.

Furthermore, it is worth reiterating that the general programme of habitat creation and enhancement measurements proposed will, in the long-term, improve the availability of good quality foraging habitat for badgers across the site. The conservation status of badgers will therefore be positively

[1] Cresswell, P., Harris, S. & Jefferies, D.J. 1989. Surveying Badgers. The Mammal Society Publication No.9 Mammal Society

effected by the proposals. The pre-commencement survey can be secured through an appropriately worded condition.

Amphibians
During their response, SWT provided the following comment in relation to great crested newts:

"*We would advise that the LPA seek further clarification from the FPCR on the nonlicenced method, prior to determination*."

In reference to the above comments, SWT suggest that pond P5 (P3 in the EcIA main report) "…*does represent a potential aquatic habitat for great crested newt which could at least be opportunistically used by this species."* However, they have also highlighted that in 2018 a negative eDNA result was returned for this pond. The pond dries annually and therefore it is our view that it offers very limited suitability for GCN. As detailed in our EcIA, it is therefore considered extremely unlikely that GCN would use this pond. In the unlikely event it were used opportunistically for breeding, it is extremely unlikely that such breeding attempts would be successful and that this pond could support a breeding population of GCN. Therefore, it is correspondingly extremely unlikely that GCN would be present within 250m of this pond.

Furthermore, SWT have stated "… *that there are no barriers to connectivity around the application site..."* This is refuted as it should be noted that the A25 is present along the southern boundary of the site which is a busy main road and therefore presents a significant barrier to regular dispersal for this species. As stated in our EcIA, it is therefore considered extremely unlikely that GCN would disperse successfully across this road from ponds to the south of the Site that could not be accessed during surveys as no response were received from landowners.

In any event, a RM application will be informed by updated GCN surveys and in the event that any ponds within 250m of the construction area are identified as supporting GCN, appropriate mitigation measures will be recommended to avoid any breaches in legislation. The site provides ample opportunities for enhancement where required as part of any licence application if required. Furthermore, under the current assessment within the EcIA, the Site provides significant enhancements that will provide long-term benefits for GCN including improving foraging resources and providing additional breeding habitat within the proposed ponds.

With regards to common toad, the significant habitat creation and enhancement proposals including species-rich grasslands, woodlands, scrub and ponds will all provide excellent foraging and breeding habitat for common toad in addition to GCN. Therefore, as with the majority of species recorded onsite, common toad will benefit in the long-term from the proposals.

Reptiles
During their response, SWT provided the following comment in relation to reptiles:

"*It is feasible that the woodland, woodland edge, and scrub habitat not currently surveyed supports reptiles which have not yet been accounted for and if present, could impact the proposed mitigation and strategy which is currently habitat manipulation."*

The woodland, woodland edge and scrub habitats within the central portion of the Site all provided limited suitability for reptiles as they lack the open character favoured by this group. These habitats were all densely crowded and did not support ground flora vegetation with the thatched character favoured by reptiles, not did they provide good examples of basking habitat. Suitable habitats onsite include grasslands and areas of scrub located within grassland habitats, all of which were included within the reptile surveys completed to inform the EcIA.

Regardless, it is important to note that the proposals provide significant enhancements for reptiles

including with the proposed species-rich grassland, scrub and pond habitats which will all provide optimal habitat for reptiles. Furthermore, as recommended in the EcIA, an RM application will be supported by a CEMP which will include a precautionary working measures method statement detailing working practices that will be employed during site clearance operations to prevent harm to reptiles species. Therefore, the proposals are extremely unlikely to breach legislation relating to reptiles and in the long-term, this species group will benefit from the significant habitat creation and enhancement works to be delivered by the proposals.

Biodiversity Net Gain

During their response, SWT provided a range of comments relating to BNG which will be dealt with individually.

"*…in review of Table 1 in the Biodiversity Net Gain Report and the Biodiversity Metric Calculation Tool 4.0, there appears to be an inconsistency in the area and biodiversity units for lowland mixed deciduous woodland in a good condition."*

SWT helpfully provided clarification on this comment during the meeting held between FPCR and SWT in January 2023. This minor discrepancy is a result of human error when copying area figures from the metric into the BNG report results in a minor difference. To clarify, the figures in the metric are up-to-date and accurate to the proposals presented in the accompanying figures of the BNG report submitted, which were based on the latest landscaping proposals for the Site. These figures were all calculated based on a detailed mapping exercise in QGIS using Natural England's Import/export tool for use with the metric and the figures in the metric should therefore be relied upon.

"*We would advise that the LPA seek clarification on:*
1) Where the 2.34ha of lowland mixed deciduous woodland in a poor condition will be created.
2) The methodology for the planting of the woodland along the inner road. For example, is the approach to clear the baseline scrub and woodland, and then construct the road/bury the currently overhead cable, and then plant along the road? If so, has the full impact of the road been assessed in the Metric ?"

For clarity, Figure 1 has been prepared to accompany this response letter to demonstrate where the 2.34ha of lowland mixed deciduous woodland in poor condition will be created.

With regards to the woodland planting, SWT have broadly explained the proposed planting process accurately. We can confirm that existing scrub and woodland within the road footprint has been assessed as lost and then created within the metric.

"The on-site habitat baseline ponds have been entered as being Non-Priority in the Biodiversity Metric Calculation Tool 4.0. However, we understand that great crested newt has been recorded in two ponds on-site."

The definition of priority vs. non-priority ponds has been reassessed and as suggested by SWT, Ponds P1 and P2 are in fact priority ponds. An updated version of the metric reflecting this change has been appended to this response letter. As the proposals include the retention and enhancement of all existing ponds, this change in classification has slightly improved the score from a 22.22% gain to a 22.39% gain.

"*Table 2 in the Biodiversity Net Gain Report details that drainage channels will be dug through the ex-lagoon woodland habitat in the south of the Site. It is unclear how this has been assessed within the Metric"*

The drainage channels within the woodland will be shallow features that will be dug through the existing woodland to encourage run off to flow towards an existing low point and damp area within

the central woodland parcel. Therefore, minimal tree loss is anticipated and any losses will be part of the selective thinning management of the woodland. In accordance with UKHab classification recommendations, the proposed scenario woodlands have been assessed from a top-down approach and as the works required to create these shallow channels are minor and small scale, the overall canopy of the woodlands will not be affecting. Consequently these ditches will become a feature of the woodland and it is therefore considered unnecessary and inappropriate to include them separately included in the metric.

"We would advise that the LPA request clarification on why there is no proposal for habitat created in advance years as part of the biodiversity metric calculation."

This recommendation is not considered appropriate nor proportionate to the proposals. The standard times to target condition are an important factor when determining the unit value in the BNG metric and so any time-to-target condition is already considered to have been factored into the overall net gain demonstrated. The EcIA assessment has stated that there will be short-term, not-significant negative effects as a result of the proposals and by securing the HMMP for a minimum period of 30 years, the proposals will result in a significant gain in biodiversity in excess of 20% in the long-term.

"The Biodiversity Net Gain Assessment targets the enhancement of grassland into species-rich other neutral grassland; however, we would advise that the LPA seek further detail from the Applicant on the soil conditions, and whether this has been considered as part of the proposal for habitats."

Soil samples have been taken and we are currently awaiting the results of the analysis. Habitat creation initiatives will be strongly influenced by the results of the soil samples and will be adapted as required based on the results; for example, if the pH indicates that the soil can support acidic or calcareous grasslands in places, the creation and management initiatives will be updated to reflect this. If the analysis results indicate that soil nutrient levels are elevated such that there are concerns about the likelihood of species-rich grassland successfully establishing, management will be altered to address these concerns. This would likely include a nutrient stripping management regime prior to the sowing of species-rich grassland seed or green hay to encourage the establishment of the targeted species-rich sward. The results of the soil sampling analysis can be provided in due course and any habitat creation, enhancement and management measures will be detailed in full as part of the HMMP submitted at RM stage.

I trust the foregoing provides sufficient clarity for the further information requests provided by SWT and add additional context to the assessment results set out in our EcIA report.

Yours faithfully

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Key

Red Line Boundary

Lowland mixed deciduous woodland to be created

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client
Nutfield Park Developments

project
Nutfield Park,
Tandridge, Surrey

drawing title
PROPOSED HABITATS - CREATED
LOWLAND MIXED DECIDUOUS WOODLAND

scale @ A3
1:4,100

drawn
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Figure 1