

Site Name	Twycross Zoological Park Burton Road Norton Juxta Twycross Atherstone Leicestershire	Advice Request	Ecology
Planning Ref	23/00948/FUL	Response Deadline	14 th November 2023
Planning Officer	Sullivan Archer	Completed By	Kirsten Hunter BSc ACIEEM
Date of Request	24 th October 2023	Date of Issue	13 th November 2023

Stance: Approval subject to further survey effort and mitigation proposals and pre-commencement planning conditions

Dear Sullivan,

I am writing in respect of ecological matters for the above application advice request regarding planning application 23/00948/FUL concerning development of new animal enclosures and associated infrastructure, new lecture theatre, education block, education facilities, sub stations and associated residential block and lodges, new access from Orton Hill, new car park, landscaping and other associated works (following the demolition of some existing buildings).

I have accessed the planning application documents using Hinkley & Bosworth District Council's online planning portal and reviewed the following documents:

- Combined Landscape Masterplan, Drg No. P22009-00-001-DZ-0110-05;
- Existing Site Plan, Drg No. P22009-00-001-DZ-0102-01;
- Proposed Site Plan, Drg No. TWZ-HLM-00-00-DR-L-00001 Rev P07;
- Site Location Plan, Drg No. TWZ-HLM-00-00-DR-L-00002 Rev P04;
- Soft Landscape Strategy, Drg No. P22009-00-001-DZ-400-02;
- Report to Inform Habitats Regulations Assessment, Stage 1 Screening;
- Preliminary Ecological Appraisal;
- Preliminary Bat Roost Assessment;
- Biodiversity Metric Assessment; and
- Great Crested Newt Habitat Suitability Index Assessment.

Protected Species

A Preliminary Ecological Appraisal (PEA) was carried out by Middlemarch in November 2022 and updated on 25th September 2023 for alterations to the proposed red line boundary. Regarding protected species, a great crested newt (GCN) Habitat Suitability Index (HSI) assessment, preliminary bat roost assessment (PRA) on structures and trees and pre-works badger check were advised.

In addition, production of a Construction Ecological Management Plan (CEMP) was advised to set out safeguards and appropriate working practices to minimise adverse effects on biodiversity and ensure compliance with UK wildlife legislation. Production of a 30-year Landscape and Ecology Management Plan (LEMP) was also advised.

It is advised that the further protected species surveys as recommended by the PEA and accompanying protected species reports (PRA and GCN HSI) should be carried out as per best practise guidance such as at the correct time of year and with appropriate survey effort. This includes dusk emergence and dawn re-entry surveys for bats on Buildings 1 and 4 and Tree T21 as recommended by the PRA and eDNA sampling undertaken on Pond P1 as recommended in the GCN HSI report.

Points of clarification are required regarding protected species surveys:

- Impacts on foraging and commuting bats are mentioned in Table 6.2 of the PEA and in Section 5.1 of the PRA, as habitat on Site was assessed as high suitability and because some of this habitat (mature trees, grassland and scrub) would be permanently lost. However, no bat activity surveys were advised to determine the level of usage of this habitat by bats, therefore suggested mitigation strategies may not be adequate. Justification should be given as to why bat activity surveys were not recommended in this instance; and
- Precautionary measures in the form of a Reasonable Avoidance Measures Method Statement (RAMMS) document are recommended and should cover breeding birds, common amphibians and other priority mammals e.g., hedgehogs, which have been listed as ecological concerns within the PEA, including any others resulting from the further protected species surveys. RAMMS should be in place and implemented prior to commencement of works and form a pre-commencement condition.

Biodiversity Net Gain (BNG) assessment

Regarding the Biodiversity Net Gain (BNG) report dated 09/10/2023, a significant net loss was calculated for the landscape plans referenced 'P22009-00-001-DZ-400-00 Soft Landscape Strategy'. Further on-Site solutions to increase BNG on Site should be sought. This may include 'browse' such as willow coppice which is relatively fast-growing and can be used for animal feed, hedgerows for screening staff walkways and enclosures; green roofs could also be proposed.

If net gain cannot be achieved within the Site, the provision of off-Site compensation can be Conditioned (although details of the proposed strategy should be provided).

Yours sincerely,



RED KITE NETWORK LIMITED

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Kirsten Hunter BSc, ACIEEM

Senior Ecologist

On behalf of Leicestershire County Council (Ecology Team)