

Ecological Assessment



Flowerpot Fields Pavilion, Exeter

15th October 2021



**Tyler
Grange**

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Summary

- S.1. Tyler Grange Ltd were instructed by Hydrock in August 2021 to undertake an ecological assessment in support of a planning application at the Flowerpot Fields Pavilion, Exeter (hereafter referred to as the 'site'). The site is centred on National Grid Reference SX 9115 9260.
- S.2. The main habitats within the site include modified grassland which is used as a sports playing fields and amenity areas with associated hardstanding footpaths and parking areas. Scattered ornamental trees are also present. An existing mainline railway line runs through the middle of the site and this is bounded by a wooded area along with areas of rough grassland and scrub. An existing pavilion/changing rooms building is also present.
- S.3. The proposals for the site are for the creation of a new 3G artificial all-weather rugby pitch, which will replace an existing grass rugby pitch at the same location and will require the modification of a footpath across the site. A new changing pavilion and classroom building will also be created with the existing pavilion building to be demolished. A planning application for the above will be submitted to Exeter City Council.
- S.4. The site is not covered by any statutory protection, although a number of such sites are present within the local area. Whilst the site is covered by non-statutory designations relating to the Exeter Valley Parks and Exeter Green Space Network, the proposals would not result in any impacts which would affect these designations. Given the scale and nature of the proposals as well as the distances involved it is overall considered that there is no potential for any adverse effects to occur at any of the identified protected sites.
- S.5. The site has potential to be used by species of bats, badger, breeding birds and reptiles which are all anticipated to use the site habitats on occasion. The proposals retain and protect the majority of the most ecologically important habitats on-site, namely the wooded area, rough grassland and scrub and although some trees and modified grassland will be lost to facilitate the proposals, opportunities for the species anticipated to use the site will be retained for the medium to long term and overall, no impacts to any protected species are anticipated.
- S.6. New native tree planting will be provided post-development, which will provide new opportunities for wildlife and provide biodiversity benefits. To create additional ecological enhancements at the site, the provision of bird and bat boxes is also recommended to improve opportunities for UK and local priority species.
- S.7. With the implementation of suitable mitigation and enhancement measures, the proposed development would be in conformity with relevant planning policy and legislation, as set out at Appendix 1.



Section 1: Introduction and Methodology

Introduction

- 1.1. Tyler Grange Ltd were instructed by Hydrock in August 2021 (on behalf of Exeter College) to undertake an ecological assessment of land at the Flowerpot Fields Pavilion, Exeter (hereafter referred to as the 'site'). The site is centred on National Grid Reference SX 9115 9260.
- 1.2. The main habitats within the site include modified grassland which is used as a sports playing fields and amenity areas with associated hardstanding footpaths and parking areas. Scattered ornamental trees are also present. An existing mainline railway line runs through the middle of the site and this is bounded by a wooded area along with areas of rough grassland and scrub. An existing pavilion/changing rooms building is also present.
- 1.3. The proposals for the site are for the creation of a new 3G artificial all-weather rugby pitch, which will replace an existing grass rugby pitch at the same location and will require the modification of a footpath across the site. A new changing pavilion and classroom building will also be created with the existing pavilion building to be demolished. A planning application for the above will be submitted to Exeter City Council.
- 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' (Zol) 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.

Context

- 1.5. The 'site' is defined by the application red-line boundary (see **Plan 14198/P01**), is located to the in the centre of Exeter and comprises part of an extensive areas of public open space comprising sports pitches and amenity grassland. The 'study area' extends to a 2km radius for protected and Priority Species records and non-statutory site designations, 2km for nationally designated statutory sites and a 12.5km radius for European statutory designated sites.

Methodology

- 1.6. This Ecological Assessment has been informed by the following, with detailed methods provided at Appendix 3:
 - Full desk study and records search;
 - Phase 1 habitat survey;
 - Badger *Meles meles* survey, and
 - Bat survey of buildings and trees.



- 1.7. 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 Assurance

- 1.8. All ecologists at TG 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 designation for nature conservation importance, although it is covered by a number of non-statutory designated and several designated sites are present in the study area, which are detailed the Table 2.1 below.

Table 2.1: Protected Sites

Designation	Site Details	Importance
European Protected Sites	<p>Exe Estuary Special Protection Area (SPA) and Ramsar – located approximately 4.0km south-east</p> <p>This site is designated for the presence of overwintering populations of avocet <i>Recurvirostra avosetta</i> and slavianian grebe <i>Podiceps auratus</i>, as well as an assemblage of other waterfowl including black-tailed godwit <i>Limosa limosa</i>, dark-bellied Brent goose <i>Branta bernicla</i>, dunlin <i>Calidris alpina</i>, lapwing <i>Vanellus vanellus</i>, grey plover <i>Pluvialis squatarola</i> and oystercatcher <i>Haematopus ostralegus</i>.</p>	International
	<p>South Dartmoor Woods Special Area of Conservation (SAC) – located approximately 10.4km west</p> <p>This SAC is designated for the presence of the Annex I habitat Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> with the Annex I habitat European dry heaths also present but not a primary reason for selection.</p>	



National Protected sites	Bonhay Road Cutting is the only Sites of Special Scientific Interest (SSSI) within the 2km study area. This SSSI is designated for its geological interest and as such is not considered further in this assessment.	National
Local Nature Reserves (LNR)	Two LNRs are located within the study area namely: <ul style="list-style-type: none"> • Barley Valley which is located approximately 0.8km west and is designated for grassland which supports yellow meadow ants, common lizards and butterflies; and • Belvidere Meadows which is located approximately 1.8km north-east and is designated for the presence of habitats including woodlands, meadows and hedgerows. 	County
County Wildlife Sites	Thirteen County Wildlife Sites (CWS) are present within the study area with the closest, Exwick Wier CWS located approximately 0.08km east and designed for the presence of mesotrophic running water, species-poor semi-improved grassland, marginal vegetation and bankside scrub and trees. In addition to the above two Other Sites of Wildlife Interest (OSWI) and three Unconfirmed Wildlife Sites (UWS) are also present within the study area. No other CWS, OSWI or UWS sites are present within 0.5km of the site.	County
Exeter Valley Parks	The site is covered by part of the Exeter Valley Parks, namely Riverside Valley Park. These valley parks comprise areas managed by Exeter City Council where a balance is sought between informal recreation and wildlife conservation. The Riverside Valley park, which includes the site, extends to cover the whole of the river Exe Valley, with habitats present in this area including with semi-improved neutral grassland, tidal estuary with mudflats, saltmarsh, reedbeds and marshy grassland.	Local
Exeter Green Space Network	The site is also defined as part of the Exeter Green Space Network. This network comprises areas that contribute to the Green Infrastructure Strategy for the Exeter Area and comprises the following elements: <ul style="list-style-type: none"> • Greenspace Teir A – namely areas that support wildlife-rich assemblages that do not meet the habitats of Principle Importance (HPI) criteria: <ul style="list-style-type: none"> ◦ The adjacent railway is designed as an Exeter Green Spaces A site which is described by DBRC as comprising the banks of the railway line which are steep in places with areas of semi-natural habitat. • Greenspace Teir B – namely areas that support a less rich wildlife assemblage than the Greenspace A category and have often been heavily modified through agricultural improvement or woodland planting: <ul style="list-style-type: none"> ◦ The site itself is designated as Exeter Green Space B which is described by DBRC as comprising playing fields, likely to be improved grassland and so not very species rich. 	Local



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 14198/P02**.

Table 2.2: Habitat Features

Habitat	Description	Importance
Buildings	One building (B1) is present to the west of the site. This building comprises the existing changing pavilion and is of brick construction with a pitched tiled roof and is well maintained (see Appendix 2 for full description).	Negligible
Hardstanding	Hardstanding footpaths, roads and parking areas were present across the site. These are all well maintained and in good condition with minimal encroachment from adjacent habitats.	Negligible
Native scrub	On the margins on the site and adjacent to the railway line, patches of dense scrub are present. This habitat is dominated by bramble <i>Rubus fruticosus</i> agg. along with other ruderal species including common nettle <i>Urtica dioica</i> and creeping thistle <i>Cirsium arvense</i> .	Up to local
Amenity/Modified Grassland	The site is dominated by extensive areas of species-poor modified grassland which are used as sports pitches and amenity grassland. This grassland is intensively and regularly managed with a very short sward (<5cm) present throughout. Species present include perennial rye-grass <i>Lolium perenne</i> which dominates along with annual meadow grass <i>Poa annua</i> and red fescue <i>Festuca rubra</i> . Other species present include abundant white clover <i>Trifolium repens</i> along with, daisy <i>Bellis perennis</i> , creeping buttercup <i>Ranunculus repens</i> and dandelion <i>Taraxacum</i> sp..	Negligible
Rough Modified Grassland	On the margins of the site areas of less intensively managed rough modified grassland are present. This habitat is subject to management on occasion but with a longer sward present. Perennial rye-grass dominates along with cock's foot <i>Dactylis glomerata</i> , annual meadow grass, red fescue and occasional Yorkshire fog <i>Holcus lanatus</i> . White clover is also abundant along with ribwort plantain <i>Plantago lanceolata</i> , dandelion, yarrow <i>Achillea millefolium</i> , creeping buttercup, wall barley <i>Hordeum murinum</i> , broadleaved dock <i>Rumex obtusifolius</i> , field bindweed <i>Convolvulus arvensis</i> and common nettle <i>Urtica dioica</i> .	Up to local
Broadleaved trees	Across the site a diverse range of parkland broadleaved trees are present. These trees largely comprise a mix of immature and semi-mature planted in association with the amenity grassland. Species present include native and ornamental species including turkey oak <i>Quercus cerris</i> , silver birch <i>Betula pendula</i> , small-leaved lime <i>Tilia cordata</i> , ash <i>Fraxinus excelsior</i> , cherry <i>Prunus</i> sp. and maple <i>Acer</i> sp..	Local
Wooded areas	Adjacent to the western site boundary a wooded area is present. To the south this habitat comprises a line of mature poplar <i>Populus</i> sp. trees in association with dense bramble scrub and rough grassland. To the north a more diverse mix of mature and semi-mature trees is present including oak <i>Quercus robur</i> , sycamore <i>Acer pseudoplatanus</i> , turkey oak, ash,	Local



	willow <i>Salix</i> sp. and field maple <i>Acer campestre</i> . The understorey in this area comprises dense vegetation comprising immature elder <i>Sambucus nigra</i> , ash, oak, holly <i>Ilex aquifolium</i> , rowan <i>Sorbus aucuparia</i> and cherry. Across this habitat the ground flora is dominated by ruderal species including common nettle, bramble, broadleaved dock and with rough grassland also present in places.	
Offsite habitats	<p>The railway which runs through the site is separated from the site habitats by tall security fencing. Beyond this fencing dense patches of scrub and tall ruderal vegetation are present. This habitat is dominated by common nettle and bramble with other species present including abundant elder and sycamore. A number of mature trees that overhang the site are also growing within in this offsite land.</p> <p>The managed modified grassland within the site extends offsite to the north. Allotments are present to the west beyond the railway land and the River Exe and its flood relief channel are located to the east. To the south is an area of extensive residential development.</p>	Up to local

2.4 During surveys no notable or Schedule 9 plant species were recorded within the site. Whilst DBRC did not return any records for within the site a record for Japanese knotweed *Fallopia japonica* was returned located approximately 0.04km south in 2010 adjacent to the railway. Other Schedule 9 plant species recorded locally include Himalayan balsam *Impatiens glandulifera* and wall cotoneaster *Cotoneaster horizontalis*.

Protected and Priority Fauna

2.5 Records of protected and priority fauna held by Devon Biodiversity Records Centre (DBRC) for the study area as well as the results of the site walkover completed in 2021 is detailed in Table 2.3 below.



Table 2.3: Protected and Priority Species

Habitat	Desk Study	Site survey	Importance
Amphibians	<p>The DBRC returned records for four amphibian species within the study area with the closest comprising a record for an unidentified newt <i>Lissotriton</i> sp. recorded approximately 0.1km east in 2006. Amphibian species recorded within the study area included common frog <i>Rana temporaria</i>, common toad <i>Bufo bufo</i>, smooth newt <i>Lissotriton vulgaris</i> and palmate newt <i>Lissotriton helveticus</i>.</p> <p>No records for great crested newt <i>Triturus cristatus</i> were returned within the 2km study area with the closest record located approximately 2.2 km east in 2016.</p>	<p>No waterbodies are present within site and no ponds are present within the local area. The river Exe and the associated flood relief channel are present to the east of the site although these watercourses are fast flowing and provide only limited opportunities for amphibians.</p> <p>The majority of the site does not comprise suitable terrestrial amphibian habitat, with the main habitat comprising intensively managed grassland, although the scrub and wooded areas do provide some potential terrestrial amphibian habitat.</p> <p>Given that no records for GCN have been recorded within 2km, and that no ponds or other suitable waterbodies are present within or close to the site, overall the potential presence of this species is considered unlikely.</p>	Negligible
Badgers	<p>The DBRC holds multiple badger records with the closest, located approximately 0.1km east in 2012. No additional information on this record is provided by DBRC.</p>	<p>No evidence of badger setts was recorded within the site although evidence of badger activity including a badger run-through and snuffle holes were recorded in association with the adjacent railway land offsite to the north (see Plan 14198/P02).</p> <p>Whilst the site is subject to high levels of disturbance, badgers are still anticipated to use the site for foraging and commuting on occasion. Similar and better-quality habitats are however present in the local area and overall badgers are not considered likely to be reliant upon the site.</p>	Up to local
Bats	<p>No records for any bats were returned within the site with the closest accurate records comprising roosts of common pipistrelle <i>Pipistrellus pipistrellus</i>, soprano pipistrelle <i>Pipistrellus pygmaeus</i> and lesser horseshoe <i>Rhinolophus hipposideros</i> in the Catacombs of St Bartholomew's Cemetery located approximately 0.3km east in 2007 and 2010.</p> <p>Other bat species recorded in the study area included brown-long eared <i>Plecotus auritus</i>, noctule <i>Nyctalus noctula</i>, Daubenton's <i>Myotis daubentonii</i>,</p>	<p>Building B1 was assessed as being of negligible bat roosting potential (see to Appendix 2). This building is also isolated from linear habitats which could be used by commuting bats, and is subject to external street lighting, overall no further assessment of this building with regards to bats was considered necessary.</p> <p>Whilst a number of mature and semi-mature trees are present within the site, none of the trees to be impacted by the proposals were identified as having any bat roosting potential. As such no further assessment of trees in respect of roosting bats was considered necessary.</p>	Up to local



	whiskered <i>Myotis mystacinus</i> , greater horseshoe <i>Rhinolophus ferrumequinum</i> , Natterer's <i>Myotis nattereri</i> , serotine <i>Eptesicus serotinus</i> and barbastelle <i>Barbastella barbastellus</i> .	<p>The site habitats including the scattered trees and wooded area are anticipated to be used by common bat species to forage and commute on occasion, these features are however already subject to disturbance from trains and streetlights.</p> <p>Overall, the habitats present at the site are common locally and it is not considered that any bat species would rely upon the site to forage or commute.</p>	
Birds	DBRC holds extensive bird records for the local area with species recorded within the site including the BoCC amber listed swift <i>Apus apus</i> , black-headed gull <i>Chroicocephalus ridibundus</i> and dipper <i>Cinclus cinclus</i> .	<p>Whilst the habitats within the site provide some nesting and foraging habitat for common garden and urban bird species, in particular the trees and wooded area, these habitats are common in the local area.</p> <p>Given that the site is subject to intensive management and high levels of disturbance, overall it is not considered to be of any particular ornithological interest.</p>	Up to local
Invertebrates	DBRC holds extensive invertebrate records although no accurate records were returned for within the site with the closest comprising a record of cinnabar <i>Tyria jacobaeae</i> located approximately 0.3km south in 2004.	The habitats present are largely sub-optimal for invertebrates, comprising regularly managed modified grassland and whilst the trees and wooded area do provide some suitable opportunities, these are common locally. More optimal and extensive opportunities for invertebrates are available in the wider area.	Negligible
Reptiles	Records for slow-worm <i>Anguis fragilis</i> common lizard <i>Zootoca vivipara</i> and grass snake <i>Natrix Helvetica</i> were all returned in the study area with the closest comprising a record for slow-worm located approximately 0.1km west in 2003.	<p>The majority of habitats on site, namely the amenity modified grassland, are subject to regular and intensive management which results in a very short grass sward which is not considered to be suitable for reptiles.</p> <p>The areas of rough grassland do however offer some limited opportunities for reptiles and there is some limited connectivity between these areas of habitat and the adjacent areas of suitable habitat, such as along the offsite railway land. As such, whilst the suitable habitat within the site is subject to disturbance by members the public, there is nonetheless some potential for common reptile species to be present in low numbers.</p> <p>More extensive and better-quality reptile habitat is however present locally and overall, if present the site would not be anticipated to support any reptile population alone.</p>	Up to local



Other species	DBRC holds a number of records for hedgehog <i>Erinaceus europaeus</i> , a UK Priority Species, with the closest record approximately 0.3km east in 2000.	The habitats on site, namely the wooded areas and scrub, could potentially support foraging and sheltering hedgehog, although similar and better-quality habitats are present locally and hedgehog are not considered likely to be reliant upon the site.	Up to local
	A number of records were also returned for otter <i>Lutra lutra</i> with the closest in the adjacent river Exe in 2016.	The habitats on site are not considered suitable for otter with no aquatic habitats present and with high levels of disturbance and management making the site unsuitable as terrestrial habitat.	Negligible
	Two records were also returned for hazel dormouse <i>Muscardinus avellanarius</i> with the closest approximately 1.2km west in 2011.	Opportunities for dormouse, are very limited within the site and whilst the scrub and wooded area could be used by this species, these habitats are isolated in the landscape and separated from connected optimal habitat by extensive urban development. As such, and considering the distance of the site from the closest records, overall the potential presence of this species is discounted.	None



Section 3: Potential Impacts, Mitigation and Enhancement

Proposals

- 3.1. The proposals for the site will result in the loss of existing areas of intensively managed modified grassland, which will be required to facilitate the creation of a new artificial 3G all-weather rugby pitch as well as a new changing pavilion and classroom building. The proposals will primarily result in the loss of an area of modified grassland and an existing building, although these habitats are of limited ecological importance. A number of immature trees will also be lost along with a semi-mature ash adjacent to the wooded area.
- 3.2. The proposals have been designed to retain the habitats of greatest importance, including the majority of broadleaved trees, areas of rough grassland, the wooded area and scrub which will all remain unaffected by the proposals and thereby maintain opportunities for the species anticipated to utilise the site. The provision of new native tree planting in association with the new building would mitigate for losses (see **Plan 14198/P03**).

Potential Impacts and Requirement for Mitigation

- 3.3. 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 Exeter City Council to take measures to protect species or habitats from the adverse effects of development, where appropriate, by using planning conditions or obligations.
- 3.4. Where there are potential impacts in the construction and/or operational phases of the development to the ecological resources described and evaluated in Section 3, 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.
- 3.5. The mitigation and enhancement strategy would be controlled through the provision of a Construction Environmental Management Plan (CEMP), which will set out the measures to protect retained features through appropriate fencing and site best practice to avoid impacts to off-site receptors, such as from contaminated run-off.

Protected Sites

Statutory sites

- 3.6. No statutory designated sites are located within or adjacent to the site boundary. Various European statutory sites are located in the study area with the closest, comprising the Exe Estuary SPA and Ramsar located approximately 4.0km east. This designated site, as well as all the



designated sites in the study area, are separated from the site by extensive areas of existing urban development and roads, and given the distances involved and the nature of the proposals, the development is not anticipated to have any adverse effects on any statutory sites.

- 3.7. Nonetheless, standard construction safeguards will take place during the construction phase, such as those in relation to contaminated run-off, noise and dust with further detail to be provided within a CEMP (BS42020:2013). These measures will ensure no impacts occur to any adjacent habitats or protected sites in the study area.
- 3.8. Whilst no hydrological features are present within the works areas, the site is located adjacent to the River Exe which is directly connected to the Exe Estuary protected sites. As such, construction would be undertaken in accordance with CIRIA good practice guidance (Charles, 2015) with further details provided in the CEMP. This will ensure no impacts as a result of run-off or dust could occur as a consequence of works at the site. Where appropriate, method statements would be produced for high-risk activities, such as refuelling and use of concrete.
- 3.9. Any potential adverse effects from noise and vibration would also be mitigated through standard engineering practice, adhering to current guidance and legislation, although given the distances involved no impacts as a result of noise will occur at any protected sites.
- 3.10. Recreational pressure has been identified as a potential impact pathway at the protected sites in the study area (Liley *et al*, 2014). Given the nature of the proposals, which will create improved recreational opportunities in Exeter city and will not contribute to any increase in local housing numbers, overall it is not considered there is any possibility of the proposals resulting in an increase in recreational pressure at these protected sites. As such no mitigation in respect of this impact pathways will be required.
- 3.11. With the adoption of protection measures to prevent impacts occurring during construction there would be no possibility of any Likely Significant Effect occurring at any designated sites as part of the proposed development, either alone or in combination with any other plans or projects.

Non-statutory sites

- 3.12. The site is designated as part of Exeter Valley Park and Exeter Green Space Tier B. The adjacent railway line also part of Exeter Green Space Tier A, although this feature is located offsite and is to remain unaffected by the proposals.
- 3.13. Whilst comprising part of the Exeter Valley Park (Riverside Valley park), the site does not feature any of the habitats for which this park is designated, including semi-improved neutral grassland, tidal estuary with mudflats, saltmarsh, reedbeds and marshy grassland. As such whilst forming part of this Valley Park, the proposed works at the site would not impact any of the habitats for which the park is designated, with these located offsite in the wider area and to remain unaffected by the proposals. As such, the proposed works, which will primarily result in the loss of modified grassland and would maintain the majority of the site as an area of manged open space, would not result in any impacts to the Exeter Valley Parks.
- 3.14. The site is also covered by Exeter Green Space Tier B, and this area is accurately described by DBRC as comprising playing fields of improved (modified) grassland. Whilst the proposals for the site will result in the loss of modified grassland, the majority of the site, as well as areas of this greenspace beyond the site boundary, will be maintained as playing fields and grassland



managed for amenity purposes. As such, it is considered that the proposals for the site would maintain the features for which the site is designated and as such no impacts on this designation would occur.

- 3.15. Furthermore, the recommended new native tree planting will compensate for the loss of trees that is to occur and post-development.
- 3.16. A number of other non-statutory sites are present in the local area including Exwick Weir CWS, which is located approximately 0.08km to the east. The measures detailed above to prevent impacts occurring during construction, such as from run-off and dust, will also ensure that no impacts occur to this or any other non-statutory designated site in the local area.
- 3.17. As such, the proposed development would be in line with relevant legislation and planning policy regarding designated sites.

Impact Risk Zones

- 3.18. The site is located within the Impact Risk Zone (IRZ) for at least one SSSI, namely Exe Estuary SSSI, which is part of the Exe Estuary SPA and Ramsar. As identified on MAGIC, the site is covered by the risk factor area which requires the LPA to consult with Natural England with regard to industrial/infrastructure proposals, air pollution or combustion processes, landfill or proposals resulting in significant water discharge to ground or surface water and residential development above 50 units. As such, the proposals do not meet the risk categories identified at this location and considering the measures outlined above to prevent impacts occurring to designated sites, overall no impacts to this or any other SSSIs will occur.

Habitats and Flora

- 3.19. A summary of habitat losses and gains as part of the development is provided below. This table should be read in conjunction with Ecological Constraints and Opportunities Plan (**Plan 14198/P03**).

Table 3.1: Balance sheet showing habitat losses and gains

Ecological Feature	Pre-development	Loss	Gain	Balance
Amenity/modified grassland	c. 26,553 m ²	-10,234 m ²	+0 m ²	-10,234 m ²
Buildings	c. 320 m ²	-320 m ²	+660 m ²	+340 m ²
Hardstanding	c. 2,320 m ²	-376 m ²	+990 m ²	+614 m ²
Native scrub	c. 652 m ²	-0 m ²	-	No change
Rough grassland	c. 417 m ²	-0 m ²	-	No change
Wooded area	c. 2,920 m ²	-0 m ²	-	No change
3G Rugby Pitch	-	-	+9,280 m ²	+9,280 m ²
Broadleaved trees	c. 14 trees	-3 trees	+ 4 trees	+ 1 tree

- 3.20. As demonstrated above, the proposals will require the loss areas of the modified grassland and the existing building which are both of is of **negligible ecological importance**. Whilst a number of broadleaved trees are also to be lost the majority are to be retained and will be unaffected by the proposals. All other existing habitats within the site to be retained.
- 3.21. Whilst of limited ecological importance in order to compensate for this loss of habitat, new tree planting will be provided post-development. It is also recommended that additional areas of new



landscape planting which could include native trees and shrubs be provided to create additional opportunities for wildlife. The provision of areas of wildflower grassland in association with the new building could also be used to create further ecological enhancements.

- 3.22. Such measures would provide overall gains to biodiversity post-development and as such the scheme would therefore be in-line with local policy (see Appendix 1).

Fauna

Badger

- 3.23. Whilst no evidence of badger setts has been identified within the site, evidence of badger activity was recorded close to the site and as such it is anticipated that badgers do utilise the site, as well as other areas of offsite habitat, for foraging and commuting on occasion.
- 3.24. To ensure that no impacts occur to badgers during construction activities all contractors working on the site will be briefed regarding the potential presence of badgers. Any trenches or deep pits that are to be left open overnight will be covered 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.
- 3.25. Any trenches or pits will be inspected each morning to ensure no badgers have become trapped overnight. Should a badger become trapped in a trench it will likely attempt to dig itself into the side of the trench, forming a temporary sett. Should a trapped badger be encountered Tyler Grange, or an appropriate expert will be contacted immediately for further advice.
- 3.26. The storage of topsoil or other 'soft' building materials on site should be given careful consideration. 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.
- 3.27. Post-development the site will maintain the majority of the existing opportunities available for badger and opportunities for these species in the wider area will also remain unaffected by the proposals. As such, no impacts to this species should occur.

Bats

- 3.28. No evidence of roosting bats has been recorded at the site, and whilst Building B1 and a number of trees are to be lost, none of these feature have been identified as having any bat roosting potential. As such, there is no possibility of any impacts occurring to roosting bats.
- 3.29. The proposals have been designed to retain and protect the habitats of greatest importance for bats and with the retention and buffering of the existing trees and vegetation across the site, existing opportunities for commuting and foraging bats will be maintained post-development. This will also maintain connectivity both within the site but also to other habitats in the wider area.
- 3.30. Whilst the proposed 3G rugby pitch will include new artificial flood lighting, these lights will be orientated away from areas of retained habitat which could be utilised by commuting and foraging bats. In addition, this new lighting will be fitted with control switches and time clocks installed to ensure they do not remain on any later than the permitted curfew hour and therefore



mitigate impact on the surrounding environment. The site and its immediate environs are already subject to artificial lighting, including from street-lights and overall it is not considered that this new intermittently used lighting would result in any impacts to commuting and foraging bats

- 3.31. To provide a further enhancement the site for bats, three general purpose bat boxes (such as the CJ Wildlife Large Multi Chamber WoodStone Bat Box or similar) should be provided and installed on suitable retained trees. This would provide new roosting opportunities for crevice dwelling species most likely to utilise the site, including common pipistrelles.
- 3.32. Overall, it is considered that the measures detailed would maintain and improve roosting, foraging and commuting opportunities for bats, creating an enhancement post-development.

Breeding Birds

- 3.33. The retention of the trees, wooded area and other habitats at the site will maintain the majority of opportunities for nesting and foraging birds and as such the species anticipated to be present would likely continue to use the site post-development. Whilst the loss of modified grassland may result in a reduction of foraging opportunities, this is considered to be insignificant especially given the extent of suitable habitat in the wider area that will remain unaffected by the proposals.
- 3.34. All wild birds, their nests and eggs are afforded protection under the WCA 1981 (as amended). In order to avoid a breach in the legislation, any removal of any buildings or planting/trees should be undertaken outside the nesting bird season (March to August inclusive). Should this not be possible, a thorough search of the habitat would need to be completed by a suitably qualified ecologist immediately prior to the works, 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. Post-development the provision of new tree planting will create additional opportunities for birds and as a further enhancement new nesting opportunities would be created through the provision of three nest boxes (such as the Vivaro pro Seville or similar) on suitable retained trees, with such features positioned so as to provide easy access to suitable foraging habitat.
- 3.36. Overall, it is considered that the measures detailed would maintain and improve nesting and foraging opportunities for birds, creating an enhancement post-development.

Reptiles

- 3.37. The majority of habitats at the site do not comprise suitable reptile habitat, with the majority of modified grassland vegetation being intensively managed to a very short sward and subject to disturbance which reduces its suitability.
- 3.38. Opportunities for reptiles are restricted to areas of rough modified grassland and scrub on the margins of the site, and it is anticipated that low numbers of reptiles may utilise the site on occasion. Based on the proposals it is not anticipated that any works within these areas of suitable habitat would be required and as such it is not anticipated that any impacts to reptiles would occur.
- 3.39. All reptiles are afforded protection under the WCA 1981 (as amended) although it is important to note that this legislation protects the species, but not their habitat. As such, in the event any



impacts to suitable reptile habitat should be required, mitigation would be based around ensuring that no reptiles are harmed during works that could impact habitats in use by them.

- 3.40. As such the removal of suitable habitats should be undertaken under supervision with habitat manipulation used to ensure that no reptiles or amphibians are killed or injured.
- 3.41. This would involve phased and supervised habitat clearance to drive reptiles (and any amphibians that may be present, although unlikely) to areas of retained habitat and away from the development site. Therefore, areas of suitable reptile habitat to be impacted will be subject to habitat manipulation works within the active reptile season (March/April to September/October) and during suitable weather conditions. This work will involve reptile habitat being cut down to approximately 15cm initially and then subsequently to ground level under the supervision of an experienced ecologist.
- 3.42. Refuge areas such as logs or stones should be checked before the manipulation works commence, removed and placed within the retained habitat by a supervising ecologist. Any caught reptiles will also be removed to the retained hedgerow habitats.
- 3.43. Once completed the cleared areas should remain clear of vegetation until construction activities are complete in order to prevent the re-colonisation by reptile species. Further details would be provided within a CEMP.

Other Species

- 3.44. 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 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.



Section 4: Conclusion

- 4.1. No ecological features that would affect the principle of development at the site have been identified.
- 4.2. No adverse impacts to any statutory or non-statutory designated sites are anticipated as a result of the development.
- 4.3. In order to provide biodiversity enhancements, the scheme has been designed to avoid impacts to the most ecologically important habitats and new tree planting will be provided so as to create enhancements for wildlife.
- 4.4. The site is considered to provide opportunities to foraging badger, commuting and foraging bats, nesting and foraging birds, reptiles and hedgehog. These opportunities will remain in the medium to long-term following the completion of works and enhancements to the biodiversity value of the site for these species are possible through the provision of bat and bird boxes.
- 4.5. With the implementation and enhancement strategy described in this assessment, it is considered that the proposed development would be in conformity with relevant policy and legislation, as set out in Appendix 1.



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Appendix 1: Legislation and Planning Policy

Legislative Context

- 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 2010 (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 2010 (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 partnership in 2011 and covers the period 2011 to 2020. However, the lists of UK Priority Species and Habitats agreed under the UKBAP 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 UK Priority Species under the UK Post-2010 Biodiversity Framework.
- A1.6 UK 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

A1.7 The National Planning Policy Framework (NPPF) was updated 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 July 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 182) considers the conservation and enhancement of the natural environment including habitats and biodiversity (paragraphs 179-182)

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

- “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);
- 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
- 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:

- “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 stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- 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 1780 states that local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

- “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;
- 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;

- 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 reasons and a suitable compensation strategy exists; and
- development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.”

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

- “potential Special Protection Areas and possible Special Areas of Conservation;
- listed or proposed Ramsar sites; and
- 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 the planned project is likely to have a significant effect on a habitat site (alone or in combination with other plans or projects) unless an appropriate assessment has concluded the plan or project will not adversely affect the integrity of the habitats site.

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

A1.16 ODPM Circular 06/05 was prepared to accompany PPS9, however continues to be valid, and material in the consideration of planning applications since PPS9's replacement by the NPPF.

A1.17 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, potential Special Protection Areas (pSPAs), SPAs and Ramsar sites) and Part II considers the legal protection and conservation of nationally designated sites, namely Sites of Special Scientific Interest (SSSIs).

A1.18 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.

A1.19 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

A1.20 The Site is wholly located within the area of Exeter City Council.

Exeter City Council: Core Strategy 2012

A1.21 **CP11:** Development should be located and designed so as to minimise and if necessary, mitigate against environmental impacts.

A1.22 **CP16:** The strategic green infrastructure (GI) network is shown on the key diagram. The Exeter GI network has been identified to protect and enhance current environmental assets and local identity and to provide a framework for sustainable new development.

A1.23 GI will be an integral part of planning for the urban extensions at Monkerton/Hill Barton, Newcourt and Alphington. New multifunctional areas of green space and green corridors will be created to meet the needs of these new communities. A sustainable movement network will link the urban area to the urban extensions and beyond to the open countryside. To the east of the city green corridors, that incorporate multi-use trails (for cycling, walking and horse riding) and provide high quality biodiversity habitat, will link Exeter to the proposed Clyst Valley Park and on to Cranbrook.

A1.24 The character and local distinctiveness of the areas identified below, will be protected and proposals for landscape, recreation, biodiversity and educational enhancement brought forward, in accordance with guidance in the Green Infrastructure Strategy, through the Development Management DPD:

- the hills to the north and north west;
- Knowle Hill to the south west;
- the strategic gap between Topsham and Exeter;
- and the Valley Parks: Riverside, Duryard, Mincinglake, Ludwell, Alphington to Whitestone Cross, Savoy Hill and Hooper.

A1.25 The Exe Estuary European Site will be protected. Development that is likely to have a significant effect on the integrity of the Exe Estuary, East Devon Pebblebed Heaths/East Devon Heaths or Dawlish Warren European sites will be subject to the Habitats Regulations 2010 and the requirement therein to undertake a Habitat Regulations Assessment. Contributions will be sought from new development towards management and other measures at the Exe Estuary, Dawlish Warren and Pebblebed Heaths and at other European sites as may be justified by the emerging evidence base.

A1.26 The biodiversity value of Stoke Woods and Bonhay Road cutting SSSI, and all other sites of national, regional and local conservation importance will be protected, and unavoidable impacts mitigated and compensated for, in accordance with their relative status.

A1.27 Biodiversity enhancement areas, for the restoration or creation of new priority habitats, will be identified within the strategic nature areas to the north of the city and in other areas of biodiversity and geological interest. Proposals for these areas will be brought forward through the Development Management DPD.

A1.28 Opportunities to provide green corridors, open space and allotments, to enhance cycling and walking opportunities, to link existing habitats, to incorporate environmental assets and to integrate biodiversity, proposed by the Exeter Green Infrastructure Strategy, will be secured through partnership working, direct implementation and the application of Policy CP18 (see Section 11).



Appendix 2: Survey Methodology and Results

A2.1. Tyler Grange completed the following surveys at the site in September 2021 and the methodologies for these are provided below:

- Full desk study and records search;
- Phase 1 habitat survey;
- Badger surveys; and
- Bat surveys - assessment of trees and buildings for roosting bats;

Data Search

A2.2. 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.

A2.3. This data search covered the study area using the distances defined in the previous section. It was completed in September 2021 with the following organisations and resources contacted and consulted:

- Devon Biological 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
- Exeter City Council website for details of relevant local planning policies and supplementary planning guidance.

A2.4. Information supplied by these organisations has where relevant, been incorporated into the following report.

Extended Phase I Survey

A2.5. An extended Phase I habitat survey of the site was undertaken on 7th September 2021. 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 (Butcher *et al*, 2020).

A2.6. 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.



Detailed Phase 2 Surveys and Results

Badger

- A2.7. A badger survey across the site was undertaken on 7th September 2021. This survey 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. The following information was recorded:
- The number and location of well used or very active entrances; these are clear from any debris or vegetation and are obviously in regular use and may, or may not, have been excavated recently.
 - The number and location of inactive entrances; these are not in regular use and have debris such as leaves and twigs in the entrance or have plants growing in or around the edge of the entrance.
 - The number of disused entrances; these have not been in use for some time, are partly or completely blocked and cannot be used without considerable clearance. If the entrance has been disused for some time all that may be visible is a depression in the ground where the hole used to be and the remains of the spoil heap.
- A2.8. 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.
- A2.9. No evidence of badger setts was recorded during the survey although evidence of a badger run-through and foraging signs were recorded to the north of the site in association with the adjacent railway land.

Bats

- A2.10. All buildings and trees within the site were inspected on 7th September 2021 for their potential to support roosting bats following BCT 2016 Guidelines and with reference to Natural England's Standing Advice (Natural England, 2015) and Bat Mitigation Guidelines (Mitchell-Jones, 2004) and the JNCC Bat Workers' Manual (Mitchell-Jones and McLeish, 2004).
- A2.11. The building and tree survey involved a ground level assessment of the building and trees for features which could be utilised by roosting bats or for any evidence of bats themselves (e.g. droppings; feeding remains).
- A2.12. The potential of the buildings and trees to support roosting bats was assessed using the criteria shown in Table A3.1 below.



Table A3.1: Building/Tree Assessment Criteria - adapted from Collins, 2016.

Suitability	Description of roosting habitats
Negligible	Negligible habitat features on site likely to be used by roosting bats.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation). A tree of sufficient size and age to contain Potential Roost Features (PRFs) but with none seen from the ground or features seen with only very limited potential.
Moderate	A structure or tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only).
High	A structure or tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time.

A2.13. The existing pavilion building (B1) comprises a two storey structure which is of brick construction with the roof structure comprising pitched tiled sections as well as flat roofed sections with roof lights. The building is very well maintained with the roof tiles secure and with the wooded clad gable ends in good condition and tight fitting. Wooden soffit boxes were also present which were also tight fitting to the brickwork. Some very small gaps were present where roof trusses protrude from the roof edge although these were mostly well sealed. The brickwork was in good condition with no gaps or cracks recorded – Negligible Bat Roost Potential

Limitations

A2.14. There were no limitations to the surveys.



Appendix 3: Site Photographs



Photo 1: Existing playing fields looking west towards railway



Photo 2: Wooded area adjacent to railway looking north



Photo 3: Building B1 (Southern elevation)





Photo 4: Building B1 (North western elevation)



Photo 5: Scrub and rough grassland adjacent to building B1



Photo 6: Existing playing fields to north of Building B1



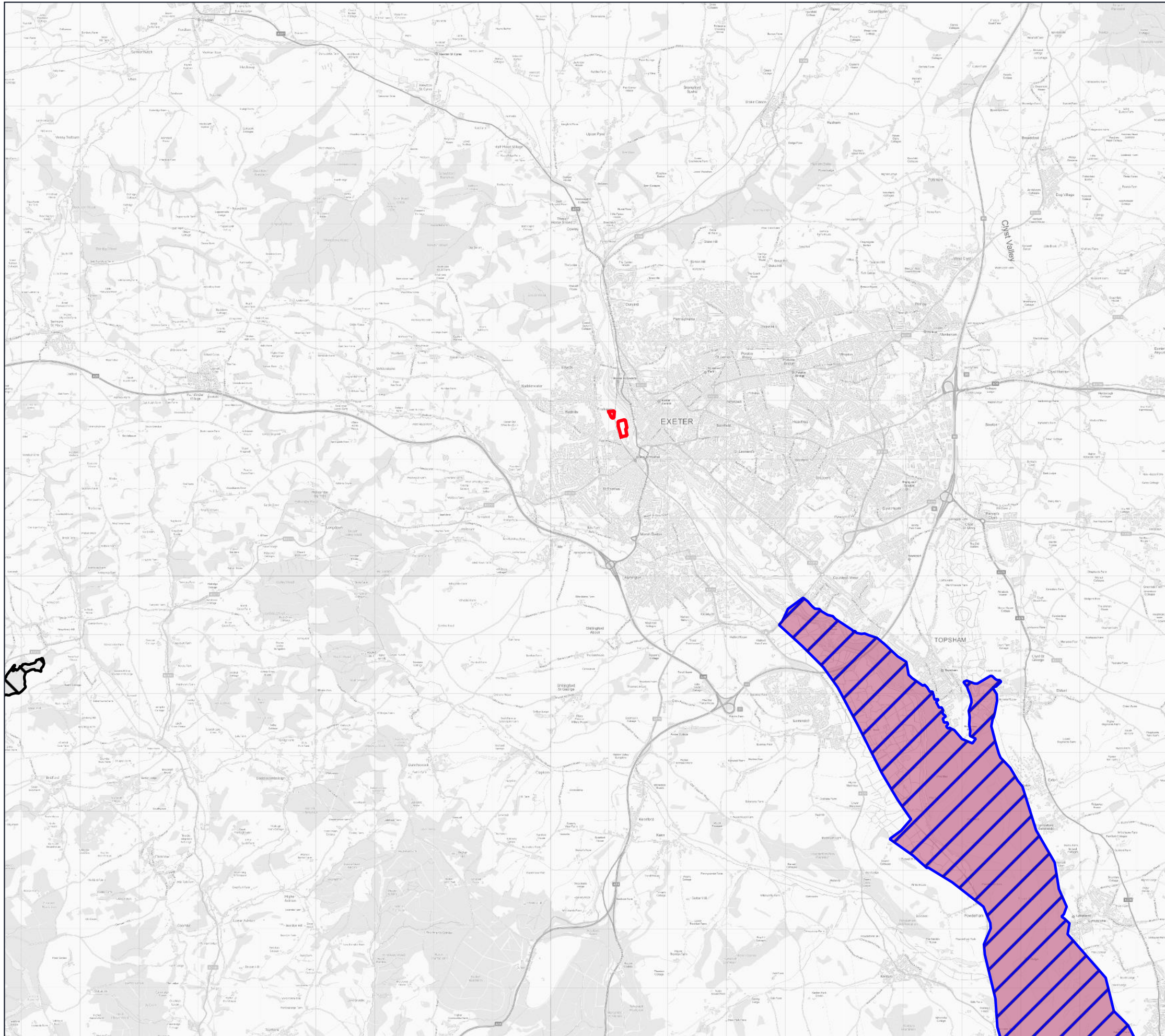
Plans:




14198/P01: Site Location and Location of European Protected Sites

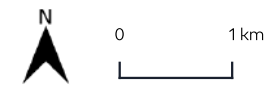
14198/P02: Habitat Features

14198/P03: Ecological Constraints and Opportunities





-  Site Boundary
-  Exe Estuary SPA and Ramsar
-  South Dartmoor Woods SAC



Project	Flowerpot Fields and Pavillion, Exeter
Drawing Title	Site Location and Location of European Protected Sites
Scale	As Shown (Approximate)
Drawing No.	14198/P01
Date	October 2021
Checked	AH/JP
CDM Review	AH/JP



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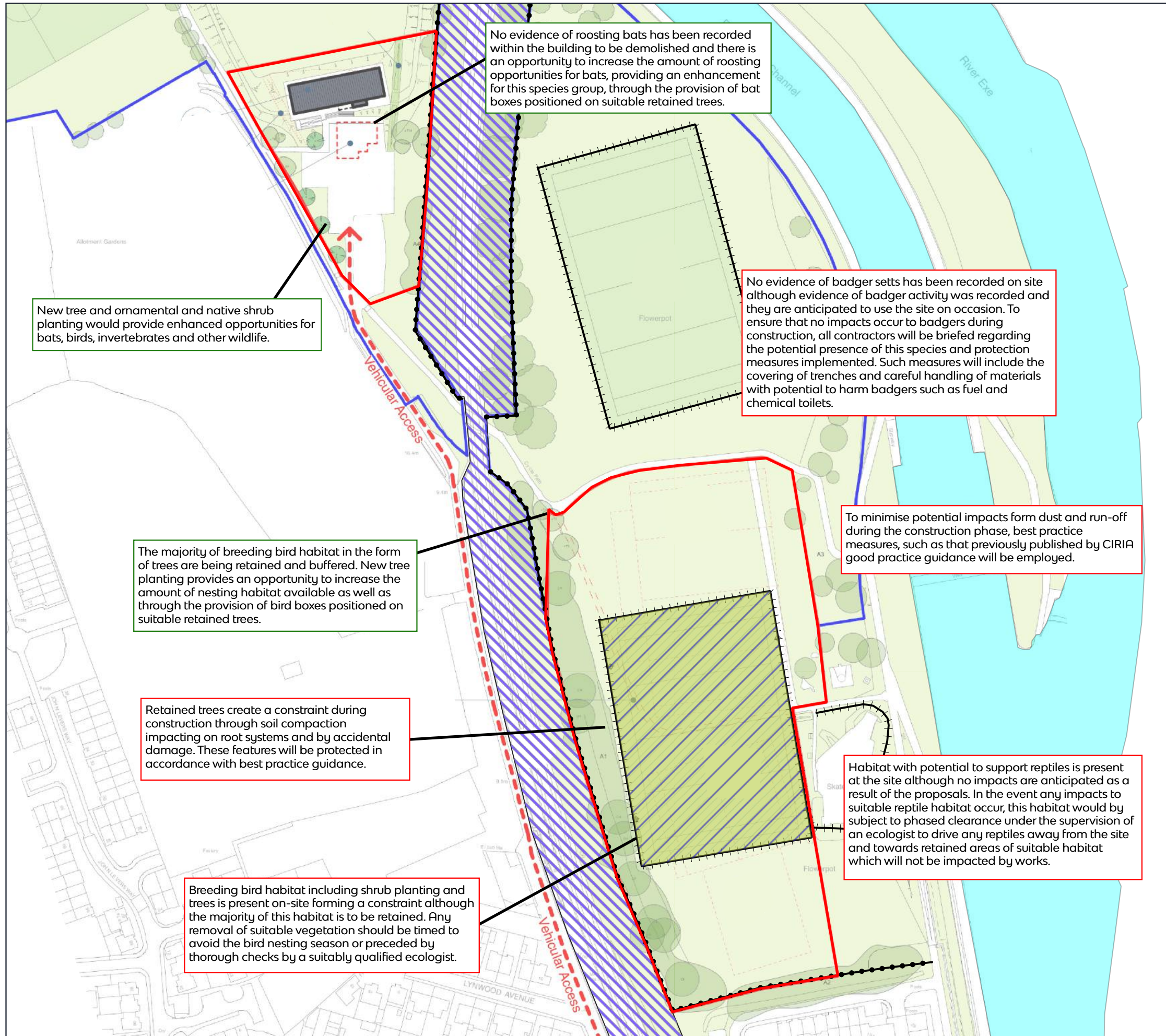
-  Site Boundary
-  Buildings
-  Hardstanding
-  Native scrub
-  Amenity/Modified grassland
-  Rough modified grassland
-  Wooded area
-  Broadleaved trees
-  Amenity fence
-  Security fence
-  Offsite railway land
-  River Exe and Flood Relief Channel
-  Badger run-through
-  Badger foraging evidence










Project	Flowerpot Fields and Pavillion, Exeter
Drawing Title	Habitat Features
Scale	As Shown (Approximate)
Drawing No.	14198/P02
Date	October 2021
Checked	AH/JP
CDM Review	AH/JP



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-  Site Boundary
-  Proposed building
-  Proposed 3G rugby pitch
-  Amenity fence
-  Security fence
-  Offsite railway land
-  River Exe and Floor Relief Channel



Project	Flowerpot Fields and Pavillion, Exeter
Drawing Title	Ecological Constraints and Opportunities
Scale	As Shown (Approximate)
Drawing No.	14198/P03
Date	October 2021
Checked	AH/JP
CDM Review	AH/JP



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