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Ref: APP/Q3115/A/25/3377313 - Land West of Kidmore End Road

Dear Mr Allin,

I understand some questions have been raised at the appeal hearing that you would like me to assist in answering. I understand these to broadly be as follows:

1. Is there a plan illustrating the extent of ancient woodland habitat present at the appeal site and how have appropriate 15m buffers been calculated from this habitat.
2. How have impacts to ancient woodland habitat been considered, particularly in reference to recreational pressure and what mitigation and compensation measures will be possible to ensure there is not harm to this habitat.
3. How can appropriate dark corridors be achieved around the site, particularly with respect to the western boundary in consideration of a 0.1 lux limit.

I have sought to answer each of these queries in turn below.

1. Ancient Woodland habitat extent and mapping

The extent of ancient woodland habitat adjacent to the appeal site is illustrated in figure 11 of the EclA¹ (Page 22). This is a direct extract from the Multi-Agency Geographic Information for the Countryside (MAGIC) resource (magic.gov.uk). Different GIS tools are used to extract and interpret information from Magic and ensure accuracy. The Ecology Co-op uses QGIS to plot over the plans provided by MAGIC and measures features such as buffer zones by using an offset tool that will accurately measure a 15m

¹ The Ecology Co-op (2025). *Ecological Impact Assessment - Land West of Kidmore End Road* (Rev 1.1)

distance from the Ancient Woodland polygon.

As best practice, we always use the polygon areas provided by MAGIC, unless there is a clear indication that the data may be incorrect. On very rare occasions, polygons have extended over areas where woodland habitat does not exist, however at this site no such issue has been identified.

2. Impacts to Ancient Woodland Habitat and recreational pressure

The impacts to the ancient woodland in the absence of any mitigation measures are discussed in section 4.2 of the EclA. (pages 57-58) This notes the risks associated with visitors straying from paths and increased dog walking, with the significance of this effect rated as 'likely permanent adverse at a local level'.

Within Section 5.2 of the EclA (page 63), a combination of impact avoidance and mitigation measures are set out in relation to ancient woodland (with some compensation measures provided for hedgerow loss). The following measures would be put in place to prevent direct harm to the ancient woodland habitat:

1. The incorporation of the 15m buffer.
2. The production of a Construction Environmental Management Plan to carefully manage construction phase impact risks (including dust, noise and contamination risks).
3. The incorporation of a carefully designed landscaping strategy within buffer zones to restrict access by both people and domestic pets, as well as providing its own biodiversity value and the opportunity for the woodland environment to expand in the long-term.

Point 3 above is perhaps the most notable. This is the creation of what is referred to as a 'graded ecotone'. Such a habitat feature typically includes the lowest height habitats on the outer edge furthest woodland, moving to thorny scrub and new tree planting adjacent to the woodland itself. Such an approach ensures that there is minimal risk of light penetration into woodland environment, courtesy of this physical shield, whilst access through this buffer by the public and domestic animals is restricted by the thorny scrub layer. Key to success with this strategy is the incorporation of a good density of gorse *Ulex europaeus*, as the fine spines on this shrub forms a litter layer that deters cats and dogs in addition to people.

What I would like to draw on further to the development of the scheme since the production of the EclA is capacity for the removal of infrastructure associated with the golf Club within the woodland and the cessation of existing access through it. Existing buildings within the woodland that were used by groundskeepers can be removed from the woodland environment with a combination of natural regeneration and planting implemented to enable woodland regeneration in their place – this can be facilitated via a Construction Environmental Management Plan (CEMP) as set out in Condition 12 (CD9.12). An existing track through the woodland that was used by golfers can also be closed, with the ground allowed to recover, ensuring a positive benefit for this habitat when considered alongside measures to ensure access to the woodland is restricted and the woodland is managed for the benefit of wider biodiversity. This management can be ensured through condition 17 (CD9.12).

The opportunity through the development to effectively increase the footprint of the woodland environment (through the removal of the buildings) and reduce access through it through careful management has the potential to lead to a positive site level benefit overall.

3. Artificial lighting impacts

The Ecology Co-op consulted with Dr Phil Chapman at the South Oxfordshire & Vale of the White Horse

District Council regarding impact risks to light-averse bats, including barbastelle *Barbastella barbastellus*. Use of the site by barbastelle bats is infrequent and the site itself forms in essence somewhat of a 'dead-end' in terms of available foraging value, with adjacent residential land extending to the south, east and west of this location. As the appeal site comprises largely of fairways (a habitat of low value for foraging bats), most of the recorded use of the site is considered likely to comprise of the infrequent foraging of bats along woodland edge habitat. For context, the peak number of registrations by any logger from the most recent dataset was 22 barbastelle calls, which could be expected from a single bat or very small number of bats making repeat foraging passes within a short timeframe. Barbastelle bats are a very wide ranging species that may travel up to 20km from its roost site.

Our correspondence with Dr Phil Chapman sets out the proposal for adherence to sensitive lighting. Detailed lighting design is usually addressed in a Reserved Matters application, as Lux contour plans produced by light modelling programmes will factor in a large number of variables, including building shapes, presence of porches, security light details and window treatments. A 0.1 lux parameter is indeed a challenging target, noting that a full moon can reach a brightness of 0.3lux and makes a 0.1 lux adherence difficult to qualify during subsequent monitoring (as particularly dark evenings would need to be measured). However, modern solutions to lighting have enabled a number of novel approaches, to include window treatments, use of baffles and lighting in a spectrum that bats are not sensitive to (within the ultra-warm red spectrum).

The required parameters to ensure 'darkness' for light-sensitive bats such as barbastelle is set out in ILP Guidance Note 8². The note at paragraph 4.54 states that darkness should be considered as 0.2 lux on the horizontal plane and below 0.4 lux on the vertical plane. These may appear to be ambitious levels close to a development, however I have worked on such cases alongside lighting engineers previously, including where a nationally important population of Bechstein's bats *Myotis bechsteinii* (a light-sensitive species) were identified foraging adjacent to a development for 600 new homes and a new farm hub under appeal references APP/L3815/W/24/3344538, APP/L3815/W/24/3344661 and APP/L3815/W/24/3344663.

Whilst this combined appeal was dismissed, the inspector found in favour of our lighting strategy, which had focussed not just on ensuring darkness by the ILP definition was met for the ancient woodland habitat, but for the entirety of the adjacent buffer also, which ran very close to housing development. The Inspectors conclusion on this matter is provided at paragraphs 86-89.

Dark corridors have been proposed to move around the site, with particular relevance to the northern and western boundaries where the development borders woodland and tree lines where barbastelle bat passes have previously been recorded. Barbastelle bats are 'edge habitat' specialists, flying at speed hunting moths close to adjacent features such as hedgerows and trees. Whilst not presently defined, a dark corridor would protect this zone, which would extend out at least 10m from the boundary of the feature (the tree line or woodland). When looking at the parameters plan, you will note that the western edge of the development includes an access road that helps to separate buildings from the buffer area and a surfaced footpath also separates the developed areas from the buffer to the north (whilst most of this boundary includes larger greenspaces with swales).

² Bat Conservation Trust and Institute for Lighting Professionals (2018) Guidance note 8. Bats and Artificial Lighting. <https://www.theilp.org.uk/documents/guidance-note-8-bats-and-artificial-lighting/>

I would remain confident that a meaningful dark corridor can be maintained around the northern and western boundaries with a max 0.2 lux on the horizontal plane and below 0.4 lux on the vertical plane as per ILP Guidance. I have reached this view based on previous designs I have worked on, in part because there is space between the outer edge of the 10m woodland buffer and the dark corridor of at least a further 5 metres. This would be achieved not just through built-in sensitive lighting design measures, but through the incorporation of physical barriers to light spill, including tree planting and hedgerows, which would be sufficient for low-flying species such as barbastelle. You will note in the landscape plan (CD1.5), that hedgerows are proposed on the outside edge of the access roads and to the northern edge, hedgerows are surrounding property boundaries. This can be further re-enforced through detailed design to include further scattered trees and hedges in keeping with the site character to both reduce light spill and enhance habitat value.

I trust the above information proves useful in the inquiry.

Yours sincerely,

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