

Land off Oakhurst Rise, Charlton Kings, GL52 6NR

**Information to inform a
Habitats Regulations Assessment**

November 2018

Quality Management	
Client:	William Morrison (Cheltenham) Ltd
Project:	Land off Oakhurst Rise, Charlton Kings, GL52 6NR
Report Title:	Information to inform a Habitat Regulations Assessment
Project Number:	1005487
File Reference:	1005487- HRA.vf LN/DW/AB
Date:	15/11/2018

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Appendix 5487/B	Email from Natural England dated 25/09/2018
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1. Introduction and Background

1.1. Background and Proposals

- 1.1.1. Aspect Ecology has been commissioned by William Morrison (Cheltenham) Ltd in respect of ecological issues relating to land off Oakhurst Rise, Charlton Kings, hereafter referred to as 'the site'. The proposals are for a new residential development of up to 69 units, with associated access, parking and landscaping (18/02171/OUT).
- 1.1.2. The site is located on the eastern edge of Cheltenham, within an urban edge context. Residential properties bound the site to the north, east, and west, whilst St Edward's Preparatory School and grounds bounds the south of the site. The site itself is approximately 4.2ha in size and is dominated by grassland fields, bisected by a substantial hedgerow. Hedgerows are also situated along the western boundary and sections of the northern, eastern and southern boundaries. A number of trees, including mature and veteran trees, are also present on-site.
- 1.1.3. Three nature conservation designations of international importance under the Habitats Regulations are present within 20km of the site, namely Cotswold Beechwoods Special Area of Conservation (SAC), Dixton Wood SAC, and Bredon Hill SAC; the nearest to the site being Cotswold Beechwoods SAC located approximately 7.9km to the south. Given the proximity of the site to the European designations it is necessary to screen whether future development within the site has the potential to result in a likely significant effect on the interest features of any of the SACs.

1.2. Purpose of this report

- 1.2.1. This report sets out information to inform a Habitats Regulation Assessment of the proposed development, identifying whether the specific proposals for the site are likely to result in an adverse effect on the integrity or conservation objectives of the European designations, particularly Cotswold Beechwoods SAC; the closest of the three designations to the site

2. Legislation and Assessment Methodology

2.1. Legislation

- 2.1.1. All areas in England classified as Special Areas of Conservation (SACs) or Special Protection Areas (SPAs), collectively known as European sites, receive statutory protection under the Conservation of Habitats and Species Regulations 2017 (the Regulations). These Regulations transpose into UK legislation the 'Habitats Directive' 1992 (92/43/EEC) and the 'Birds Directive' 2009 (2009/147/EC). National planning policy in the form of the National Planning Policy Framework (NPPF) explicitly sets out that listed Ramsar sites should be considered in the same way, as if they had been classified or designated as SACs or SPAs.
- 2.1.2. The Regulations impart a duty on Local Planning Authorities (competent authorities) to carefully consider whether any proposals may have a significant effect on a European designation, either alone or in combination with other plans or projects. In most circumstances, permission may only be granted for a plan or project to proceed if it has been ascertained that it will not have an adverse effect on the integrity of any such designation.

2.2. Assessment Methodology

- 2.2.1. The approach to the formalised assessment of potential impacts arising on a European site from any proposals (termed plans or projects) is set out within the Regulations. Guidance on the process and procedures for assessment are contained in a number of documents, principally:
- National Planning Policy Framework (NPPF) and the accompanying ODPM/DEFRA Circular (ODPM 06/2005, DEFRA 01/2005);
 - Managing Natura 2000 sites 'The Provisions of Article 6 of the 'Habitats' Directive 92/43/EEC. April 2000;
 - Assessment of plans and projects significantly affecting Natura 2000 sites. European Commission November 2001.
- 2.2.2. As set out within the above documents, the procedure for assessment is an ordered process following a number of key stages, as laid out within the chart (Figure 1) within ODPM circular 06/2005 and discussed below.

Stage 1

- 2.2.3. The first stage, as set out in box 1 of the flow chart is to identify whether the proposals are directly connected with or necessary to site management for conservation.
- 2.2.4. The proposals would not be concerned with the management of the European sites; hence, following the flow lines set out, the assessment procedure should follow on to Stage 2 (set out within box 2 of the flow chart).

Stage 2

- 2.2.5. Following to stage 2, as set out in box 2 of the flow chart, it is next necessary to examine if the proposals will result in any 'likely significant effect' on the

internationally important features of the European sites, either alone or in combination with other plans or projects.

- 2.2.6. This assessment must be carried out absent a consideration of mitigation measures, as clarified by the European Court of Justice Ruling People Over Wind C-323/17.
- 2.2.7. Where it is considered that plans or projects will result in no such 'likely significant effects', no further assessment is necessary and permission should not be refused under the assessment.
- 2.2.8. If any 'likely significant effects' are identified or where it remains unclear whether effects will be significant and mitigation may be required to overcome any such effects, the assessment procedure should follow on to Stage 3.

Stage 3 onwards

- 2.2.9. Should it be determined that a plan or project will result in 'likely significant effects' on a European site, as set out on the flow chart, the Competent Authority should proceed to boxes 3 and 4 onwards, where further assessment is required. In order to apply the tests set out within boxes 3 and 4 a full 'Appropriate Assessment' of the likely effects of the plan or project must be undertaken by the Competent Authority.
- 2.2.10. The process of assessment of any likely significant effects on European sites would be guided by two other documents, namely "Managing Natura 2000 Sites: The provisions of Article 6 of the 'Habitats' Directive 92/43/EEC" and "Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites", amongst other guidance.

3. European Designations

- 3.1. Three European designations lie within 20km of the site, all of which are Special Areas of Conservation (SACs): Cotswold Beeches, Dixton Wood, and Bredon Hill.

3.2. Cotswold Beechwoods SAC

Description and Qualifying Features

- 3.2.1. Cotswold Beechwoods SAC covers an area of approximately 590ha, the majority of which (82%) comprises broad-leaved deciduous woodland. The ancient Beech woodlands are structurally diverse and species-rich and support a variety of invertebrate species including a rich mollusc fauna. Unimproved limestone grassland is also present. The entirety of the SAC is also designated as the Cotswold Commons and Beechwoods Site of Special Scientific Interest (SSSI), whilst portions are also designated as the Coopers Hill Gloucester Local Nature Reserve (LNR) and Cotswold Commons and Beechwoods National Nature Reserve (NNR).
- 3.2.2. The primary reason for the qualification of the SAC is the presence of the Annex 1 habitat *Asperulo-Fagetum* beech forests, which are the most westerly extensive blocks in the UK. This habitat is found on circumneutral to calcareous soils in southern England and Wales. The Cotswold Beechwoods SAC is floristically rich and includes the rare species Red Helleborine *Cephalanthera rubra*, Stinking Hellebore *Helleborus foetidus*, Narrow-lipped Helleborine *Epipactis leptochila* and Wood Barley *Hordelymus europaeus*.
- 3.2.3. The Annex 1 habitat, semi-natural dry grasslands and scrubland facies on calcareous substrates (*Festuco-Brrometalia*) is also present as a qualifying feature, but not a primary reason for selection of the SAC. This habitat is found on well-drained soils associated with chalk and limestone and supports numerous rare plants.

Conservation Objectives

- 3.2.4. The conservation objectives for Cotswold Beechwoods SAC, as set by Natural England, describes an intention to:

‘Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- *The extent and distribution of qualifying natural habitats;*
- *The structure and function (including typical species) of qualifying natural habitats; and*
- *The supporting processes on which the qualifying natural habitats rely’.*

Management

- 3.2.5. Natural England has provided an overview of management principles within its Views About Management (VAM) statement (see Appendix 5487/C) for the qualifying natural habitats within the designation.

Key Threats

- 3.2.6. Consultation¹ previously undertaken with the Senior Reserves Manager (Gloucester National Nature Reserves of Natural England) identified fly-tipping and the subsequent introduction of non-native species to the woodland as the main issue in terms of management within the SAC. The deviation of mountain bikers from allocated tracks/bridle-paths is not the concern it had been previously, when use was unchecked, since the implementation of appropriate management measures and discussions held with the main local bike groups to resolve this approximately 11-years ago. Further historical consultation² previously undertaken with Natural England identified key threats to be the control of Sycamore and deer browsing.
- 3.2.7. Recreational pressure on the SAC was not identified through historical consultation with Natural England as a key threat to the designation, thereby accepting recreational issues are sufficiently addressed through existing management of the SAC. Nonetheless, in response to planning application 17/00710/OUT Natural England concluded that *'Recreation has been found as an ecological pathway which is connected to the designated site in question [reference is to Cotswold Beechwoods SAC]'* and *'Natural England considers that the recreational pressure at Cotswold Commons and Beechwoods SAC may indirectly affect the interest features for which this SAC is designated'*. However, within the same consultation response Natural England remain mindful that the contribution of recreation pressure on the SAC is dependent on a development's size, proximity and accessibility to the designation.
- 3.2.8. The key threat to the SAC of recreational pressure as perceived by Natural England is considered further herein. In light of the high court judgement handed down in March 2017 in Wealden District Council v Secretary of State for Communities and Local Government, Lewes district Council and South Downs National Park Authority [2017] EWHC 351 the potential for adverse effects on air quality at the SAC from the proposed development are considered also.

3.3. Dixon Wood SAC

Description and Qualifying Features

- 3.3.1. Dixon Wood is located ~9.5km to the north of the site, covers an area of ~13ha, and is composed of a large number of ancient Ash *Fraxinus excelsior* pollards and supports a rich fauna of scarce invertebrate species associated with decaying timber on trees. It is designated on the basis of the presence of the Violet Click Beetle *Limoniscus violaceus*, originally recorded at the woodland in 1998 and on a single occasion subsequently.

Conservation Objectives

- 3.3.2. The conservation objectives for Dixon Wood SAC, as set by Natural England, describes an intention to:

¹ Ecology Solutions (March 2014) Information for an Appropriate Assessment of the impacts on the Cotswold Beechwoods Special Area of Conservation pursuant to Regulation 61 of the Conservation of Habitats and Species Regulations 2010 (as amended) 5053.IAA.vf1

² *Ibid* Footnote 1 above.

‘Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- *The extent and distribution of qualifying natural habitats;*
- *The structure and function (including typical species) of qualifying natural habitats; and*
- *The supporting processes on which the qualifying natural habitats rely.*
- *The populations of qualifying species; and*
- *The distribution of qualifying species.’*

3.4. Bredon Hill SAC

Description and Qualifying Features

- 3.4.1. Bredon Hill is located ~18km to the north of the site, covers an area of ~360ha, and is considered the largest outlying hill of the Cotswolds. It is designated on the basis of the presence of the Violet Click Beetle *Limoniscus violaceus*. Bredon Hill is noted to be an important site for fauna associated with decaying timber on ancient trees, including many Red Data Book and Nationally Scarce invertebrate species.

Conservation Objectives

- 3.4.2. The conservation objectives for Bredon Hill SAC, as set by Natural England, describes an intention to:

‘Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- *The extent and distribution of qualifying natural habitats;*
- *The structure and function (including typical species) of qualifying natural habitats; and*
- *The supporting processes on which the qualifying natural habitats rely.*
- *The populations of qualifying species; and*
- *The distribution of qualifying species.’*

4. Previous 2017 Planning Application and 2018 Proposals

4.1. Previous Planning Application (17/00710/OUT)

- 4.1.1. A previous planning application for the site was submitted to Cheltenham Borough Council in September 2017 for the construction of 90 dwellings with associated access and landscaping (17/00710/OUT).

Natural England Comments

- 4.1.2. The package of information submitted on ecology to inform the planning application touched upon statutory designations in the immediate local area to the site. Natural England's consultation response requested further information to enable determination of the potential impacts the proposals would have on the Cotswold Beechwoods SAC, stating that the proposals may have an in-combination effect with other development in proximity to the designation resulting in increased recreational pressure at the SAC that may indirectly affect the interest features for which the SAC is designated.
- 4.1.3. The applicant's previous ecology advisors provided correspondence (November 2017 and March 2018) in response to Natural England's initial consultation response and further request for information, drawing on the results of a 2013 visitor survey³ of the SAC completed by the ecology advisors for a 2014 planning application for up to 1500 new homes at Perrybrook, Brockworth, Gloucestershire (12/01256/OUT), and concluded that the proposed development would not *'be considered likely to have a significant effect on the SAC either on its own or in combination with other developments.'*
- 4.1.4. Cheltenham Borough Council subsequently carried out a screening assessment (see Appendix 5487/A) of the 2017 proposals (reported 4th April 2018) which drew on the information provided by the ecology advisor to the application, as well as advice provided by the Principal Ecologist at Gloucestershire County Council and Natural England. The Borough Council concluded that *'the project would not be likely to have a significant effect on any European (international) site, either alone or in combination with any other plans or projects (in light of the definition of these terms in the 'Waddenzee' ruling of the European Court of Justice Case C – 127/02) and an appropriate assessment is not therefore required.'*
- 4.1.5. Following this conclusion, Natural England provided further comments in April 2018 and finally in May 2018 and recommended that the Council amplify their screening assessment and carry out an Appropriate Assessment.

Officer Comments and HRA Conclusions

- 4.1.6. The officer's report for the planning application reviewed the comments from consultees and the information provided by the applicant. The planning officer particularly records the information in the appeal decision

³ Ecology Solutions Ltd (2013) *Cotswold Beechwoods Special Area of Conservation Visitor Survey Report*

(APP/G1630/V/14/2229497)⁴ for a mixed-use development including up to 1500 dwellings at Perrybrook, Brockworth. In relation to this appeal decision, the officer notes that the Planning Inspector refers to the 2013 visitor survey, and associated forecast of new visitors to the SAC potentially arising from the development being 7 per 1000 population. Accordingly, the officer determined that through the application of the same ratio to the 2017 application at Oakhurst Rise (for 90 units), approximately 3.5 new visitors to the SAC would result from the development. With this in mind, the officer was in agreement with the applicant's ecology advisor that *'no other conclusion could reasonably be arrived at other than the proposal would not have significant effects on the SAC'*.

Decision

- 4.1.7. Notwithstanding the officer's recommendation to grant planning permission, the application was refused. Five reasons were given for refusal, although only one related to ecology. The reason for refusal on ecology was on the grounds *'the development would have a negative impact on biodiversity across the site'*, contrary *'to adopted policy SD9 of the Joint Core Strategy (2017), paragraph 175(a) of the National Planning Policy Framework (2018, and Natural England's Standing Advice'*, and related specifically to the presence of a Badger sett on site.
- 4.1.8. The potential for adverse effects on the Cotswold Beechwoods SAC, or any other statutory designation, was not stated as a reason for refusal.

4.2. New Planning Application (18/02171/OUT)

- 4.2.1. The 2018 scheme is for up to 69 dwellings, associated access, parking and landscaping (18/02171/OUT). The proposals have evolved since the 2017 application to provide a more ecologically minded scheme:
- the number of dwellings has reduced by ~23% (90 to 69);
 - increased accessible green open space within the scheme;
 - a greater extent of the important hedgerow and number of veteran trees are retained and protected; and
 - a mitigation strategy has been devised which closely follows Natural England's standing advice on Badgers.
- 4.2.2. Compared to the 2017 scheme, the current application reduces effects on biodiversity throughout the site and achieves a net gain in biodiversity through the landscaping strategy and faunal specific enhancements.

4.3. SAC Visitor Survey

- 4.3.1. A visitor survey⁵ was completed in 2013 to provide data on visitor behaviour and numbers at the Cotswold Beechwoods SAC. The data, and its use to forecast the number of visitors to the SAC arising from development, was referred to by a Planning

⁴ See page 77 of officer's report to committee

⁵ *Ibid* Footnote 3 above.

Inspector in relation to a mixed-use development in Brockworth (12/01256/OUT), and subsequently by the planning officer in regard to the 2017 planning application for the site.

- 4.3.2. Natural England was contacted in September 2018 to determine whether there is more up to date survey data available so as to inform the new application for the site. In this regard, Natural England advises that a visitor survey at the SAC has been commissioned but the findings are not yet available. Until this data is available, Natural England further advises that the most up to date information is the 2013 visitor survey and that this should be used to inform planning applications (see Appendix 5487/B).

5. Stage 1 - Management of the European Designation

- 5.1. The proposals are not concerned with the management of any European Designation.
- 5.2. Hence, following the flow lines set out in the ODPM circular, the assessment procedure should follow on to Stage 2 (set out within box 2 of the flow chart).

6. Stage 2 - Screening for Likely Significant Effects

- 6.1. The following section considers the likelihood of the proposed development to have a significant effect on a European designation(s), to determine whether or not these effects can be screened out, or whether it is necessary to progress to an Appropriate Assessment (Stage 3).
- 6.2. A screening assessment (see Appendix 5487/A) by Cheltenham Borough Council was undertaken for the 2017 planning application (17/00710/OUT) for the site, which was for up to 90 dwellings with associated access and landscaping. The assessment concluded *'the project would not be likely to have a significant effect on any European (international) site, either alone or in combination with any other plans or projects (in light of the definition of these terms in the 'Waddenzee' ruling of the European Court of Justice Case C – 127/02) and an appropriate assessment is not therefore required.'*

6.3. Effects Alone

Statutory Designations

- 6.3.1. A number of statutory designations are present within 20km of the site, those of national level interest are addressed, where relevant, within the Ecological Appraisal report (5487 EcoAp vf1) by Aspect Ecology dated October 2018. Three European designations lie within 20km of the site, all of which are Special Areas of Conservation (SACs): Cotswold Beeches, Dixton Wood, and Bredon Hill. Each of the designations is described at section 3.

Likely Significant Effects

- 6.3.2. A range of environmental effects and impacts on a European designation can arise from development, as summarised below:
- **Habitat and Species – Fragmentation and Loss:** Direct land take, removal of green/connecting corridors/supporting habitat, changes to sediment patterns (rivers and coastal locations), introduction of invasive species (such as from fly-tipping garden waste) and change of management practices;
 - **Disturbance:** Increased recreational pressure, and noise and light pollution, from development and increased traffic;
 - **Changes to Water Quality and Water Levels:** Increased abstraction levels, increase in run-off/pollutants from non-permeable surfaces, topography alteration, and increased volume of discharges;
 - **Changes in Air Quality:** increase traffic movements, and increased emissions from buildings.

Cheltenham Plan HRA Assessment⁶

6.3.3. The revised HRA assessment undertaken by Cheltenham Borough Council considers the likely significant effects that may arise from the implementation of policies and proposed local sites, and screens their potential impacts against each of the three SACs (Cotswold Beeches, Dixton Wood and Bredon Hill). This includes consideration of the environmental pathways and sensitivities of the designations.

6.3.4. In accordance with HRA good practice, elements unlikely to have effects on the European designations were screened out. A summary of the HRA screening assessment is provided below.

- **Habitat Loss and Fragmentation:** The allocated sites within the Cheltenham Plan will not result in any loss or fragmentation of habitats at the SACs, and therefore these effects were screened out of the HRA. In regard to threats specific to the Cotswold Beechwoods SAC, the development of the sites would have no bearing on deer grazing or sycamore presence at the SAC, and given the separation between the sites and the SAC fly-tipping and any subsequent establishment and/or spread of non-invasive species would not be a concern.
- **Disturbance:** Increased recreational activity at Dixton Woods and Bredon Hill SACs has potential to disturb/removal decaying wood on which the Violet Click Beetle, the qualifying interest feature of the SACs, is reliant. However, recreation is not considered to be an issue at either SAC and, on the basis the designations are over 10km from the nearest allocated sites within the Cheltenham Plan, adverse effects are considered unlikely alone or in-combination. Cotswold Beechwoods SAC is also considered sensitive to disturbance from an increase in recreation, although as with the other SACs, those allocated sites situated ~10km away from the designation are considered unlikely to result in adverse effects alone or in-combination. Allocated sites 8-8.5km from the SAC are considered unlikely to significantly increase the levels of recreational access at the SAC alone, given the proximity of the SAC to Gloucester. However, in-combination effects on the Cotswold Beechwoods SAC from increased disturbance were considered possible and therefore was subject to further assessment within the HRA.
- **Changes to Water Quality and Water Levels:** None of the three SACs are considered to be sensitive to the impacts of increased surface water run-off, discharges, or abstraction and therefore this environmental effect was screened out of the HRA.
- **Air Quality:** Dixton Wood and Bredon Hill SACs are not considered to be sensitive/vulnerable to reduced air quality, such that adverse significant effects from development 8km or more from the designations are unlikely. Cotswold Beechwoods SAC is considered to be sensitive to changes in air quality and it is noted that critical loads for nitrogen levels (from vehicles) are being exceeded along the A46 (adjacent to the SAC) which connects with the A417 to Gloucester. In-combination effects on Cotswold Beechwoods SAC from reduced air quality were considered possible and therefore were subject to further assessment within the HRA.

⁶ Cheltenham Borough Council (July 2018) Cheltenham Local Plan: Pre-Submission, Habitats Regulations Assessment (HRA) Revised Screening Report & Appropriate Assessment (AA)

Conclusion

- 6.3.5. The revised HRA screening assessment undertaken by Cheltenham Borough Council concludes that due to the relatively small size and distance from the SAC (8km or more), no adverse effects on Cotswold Beechwoods, Dixton Wood, or Bredon Hill SACs would result from the development of the allocated sites alone.
- 6.3.6. The site at Oakhurst Rise, Cheltenham, is not an allocated site within the Cheltenham Plan. Regardless, given its relatively small size and separation from the SACs (~8km or more), the reasoning used by the Council to determine none of the allocated sites would result in significant adverse effects on any of the three SACs alone is equally applicable to the proposed development of Oakhurst Rise.

6.4. Effects In-Combination

- 6.4.1. As part of the assessment of potential effects on European designations arising from the proposed development, consideration has been given to potential for cumulative effects, arising in combination with other plans or projects.
- 6.4.2. In this respect, guidance (Assessing Projects Under the Habitats Directive: Guidance for Competent Authorities⁷) states that:

‘A project with a potential effect, which is insignificant on its own, is not free from the provisions of the Habitats Regulations until it has been checked in combination with the effects of other plans and projects. The in combination check must consider whether:

- a) the effects of the plans and projects, in combination, would make effects more likely to occur, or more likely to occur at significant levels, that alone would be unlikely to either occur or be significant;*
- b) the effects of the plans and projects, in combination, would make insignificant effects significant;*
- c) the effects of the plans and projects, in combination, would generate new or different effects that would not occur if the plans and projects proceeded alone.’*

- 6.4.3. The revised HRA screening assessment⁸ undertaken by Cheltenham Borough Council concludes that adverse effects on Dixton Wood and Bredon Hill SACs are unlikely alone or in-combination, such that further consideration of potential effects on these two SACs is not considered necessary. However, it was recognised that in-combination adverse effects from increased disturbance (recreation) and reduced air quality could affect the qualifying interest features of Cotswold Beechwoods SAC. As such these are considered in further detail below.

Disturbance

- 6.4.4. Recreational pressure can result in trampled ground flora, damage to surface litter and vegetation, and soil compaction and erosion. The extent of the impact is dependent

⁷ David Tyldesley and Associates for the Countryside Council of Wales (September 2011) *Assessing Projects Under the Habitats Directive: Guidance for Competent Authorities*.

⁸ *Ibid* Footnote 6 above.

on a range of factors including the sensitivity and accessibility of the habitat, type of recreational activity, number of visitors and frequency of visits. These are discussed further below in the context of the proposed development and their potential effect on the integrity and conservation objectives the Cotswold Beechwoods SAC, where relevant.

Consented Developments within Proximity to Cotswold Beechwoods SAC

6.4.5. For comparative purposes, planning permission for developments in close proximity to Cotswold Beechwoods SAC has been reviewed alongside any consultation responses provided by Natural England. Three recent applications are noted to be of interest and relevance to the current planning application at Oakhurst Rise, Cheltenham:

- **Land at Perrybrook, Brockworth:** The development was granted planning permission at appeal (APP/G1630/V/14/2229497) in March 2016. The consented development is located 1.9km to the north of the Cotswold Beechwoods SAC and is for up to 1,500 new dwellings. Within the Planning Inspector's report, it noted that Natural England's initial view was that *'there was not enough information to rule out the likelihood of significant effects arising from the project alone or in combination with others, particularly in relation to the increase recreational pressure'*. The Ecology advisor to the scheme set out within a report relevant information to enable the potential effect to be assessed, including a forecast of potential new visitors arising from the development calculated to be 7 per 1000 population (based on the 2013 visitor survey data for the designation). The proposals included an area of informal recreation. Natural England subsequently accepted the conclusions within the report which concluded *'that the project, alone or in combination, would not contribute to an overall significant effect on the SAC'*. The conclusion reached by the Planning Inspector was *'the information provided allows the competent authority to conclude that there would be no likely significant effect on the Cotswold Beechwoods SAC from this proposal, either alone or in combination. It is not necessary therefore to go on to carry out an Appropriate Assessment.'*
- **Land at Kidnappers Lane, Leckhampton, Cheltenham:** The development was granted permission at appeal (APP/B1605/W/14/3001717) in May 2016. The site is located 4.5km from Cotswold Beechwoods SAC and is for 650 new dwellings. An assessment undertaken to inform the application identified various green open space within 3km of the site which would, as stated by the Planning Inspector, *'provide assurance that adverse effects on the more distant SAC would not occur'*. It was also considered *'in relation to the size of the SAC, recreational pressures from the development are unlikely to have any measurable effect in any event'*. The conclusion reached by the Planning Inspector is that *'the proposed development would not result in any adverse effect on the integrity of the Cotswold Beechwoods SAC, either alone or in combination with other plans or projects'*. Natural England registered no concerns in regard to recreational effects on the Cotswold Beechwoods SAC with their comments being limited only to potential effects from the proposals on visual impact and *'interrupted'* views from and to the ANOB.

- **Land to the West of Farm Lane, Shurdington:** Planning permission (14/00838/FUL) was granted in April 2016 for 377 dwellings. The site is located approximately 4.7km from Cotswold Beechwoods SAC. The Committee Report recognises the presence of Cotswold Beeches SAC and states that the ecology report submitted to inform planning concludes *‘that owing to the distances involved, no direct or indirect impact to any statutorily or non-statutorily designated sites are anticipated as a result of the construction phase of the Proposed Development’*. On this basis, Council reached the overall decision that *‘there is no evidence to suggest that there are any overriding ecological constraints to the development of the site for residential purposes’*. In consultation responses from Natural England in November 2014 and August 2015, no reference is made to potential adverse effects on Cotswold Beechwoods SAC.

6.4.6. All three of the development sites above are located closer to, and would generate more visitors to, Cotswold Beechwoods SAC than the proposed development at Oakhurst Rise.

Effects of the Oakhurst Rise Scheme

- 6.4.7. **Sensitivity and Accessibility.** The site is located ~7.9km from the SAC, in terms of a Euclidean measurement (as the crow flies), with a travel distance between the site and nearest point of the designation being ~10km. Accordingly the site lies beyond reasonable walking and cycling distance. In addition, there are no footpaths or avenues of direct access between the site and the SAC. The vast majority of any visits to the SAC from the proposed development are therefore anticipated to be by private car, which was found to be the case for 78.7% of all visitors to the SAC - reported within the 2013 visitor survey report⁹. However, only 33.5%¹⁰ of people interviewed were found to have travelled between 5km and 10km to the SAC. A number of formal car parks are associated with the SAC, the nearest being ~12.5km travel from the site, whilst the nearest informal parking area to the SAC is located approximately ~10km travel from the site.
- 6.4.8. As stated above, the SAC is considered to be beyond reasonable walking and cycling distance, although it is possible that individual cycles are transported by car for use within the designation. However, it is more likely any visitors from the proposed development would visit the SAC for walking or dog walking, these activities representing 76.3%¹¹ of the reported use of the SAC by visitors.
- 6.4.9. **Estimation of Number of Visitors.** The 2011 (most recent) census identifies an average occupancy of 2.2 people per household. Based on the proposed provision of 69 dwellings, the development is estimated to be populated by 158 people.
- 6.4.10. The 2013 visitor survey¹² undertaken at Cotswold Beechwoods SAC can be used as a guide to predict trends for future users of the SAC and inform forecasts for new developments in the local area. Cheltenham is a town in Gloucestershire with an estimated population of 115,732 (2011 census). The town is located to the north-east

⁹ *Ibid* Footnote 3 above.

¹⁰ *Ibid* Footnote 3 above.

¹¹ *Ibid* Footnote 3 above.

¹² *Ibid* Footnote 3 above.

of Cotswold Beechwoods SAC, the majority of the town situated within the 5 to 10km range from the SAC.

- 6.4.11. The willing participants (~389) to the visitor survey provided details of their journey origin, such that it would be possible to extrapolate the likely proportion of new residents to Cheltenham that would utilise the SAC. However, given some of the location information, such as postcodes, is incomplete a conservative approach has been taken to the forecast. 33.5% of visitors to the SAC are reported to have travelled between 5 and 10km. Cheltenham lies within this range although it would not have been the only journey origin for visitors; the City of Gloucester and various towns and villages also lie within this distance range from the SAC. Nonetheless, for the purposes of the forecast it will be assumed that all visitors (~1352) which travelled between 5 to 10km to the SAC were from Cheltenham; equating to ~453 visitors. Expressed as a percentage, the number of willing participants assumed to be travelling from Cheltenham would equate to ~0.4% of the Cheltenham population, which translates to 4 visitors to Cotswold Beechwoods SAC for every 1000 residents. The actual proportion of visitors is expected to be much lower, given the assumption for the purposes of this calculation that all participating visitors travelling between 5 and 10km where from Cheltenham.
- 6.4.12. Based on the calculations above, for every 1000 new residents to Cheltenham it can be forecast that 4 will visit Cotswold Beechwoods SAC at some time. On this basis, the proposed development with ~158 new residents would be expected to result in 1 (rounded up from 0.632) new visitor to the SAC. Frequency of use of the SAC from any new visitors is considered below.
- 6.4.13. **Frequency of Use.** The frequency of visits to the SAC was reported within the 2013 visitor survey¹³: 10.8% at least once a day, 23.9% at least once a week, 20.1% at least once a month, 22.9% sporadically, 20.1% don't know/first visit. This information can be applied to the number of new visitors expected from a development, to estimate the proportion of visitors attending the SAC for each frequency. Given the Oakhurst Rise development is expected to result in a single new visitor to the SAC, attributing a frequency of attendance based on the proportions recorded is difficult. However, the separation of the site from the SAC (~7.9km) would not be convenient for daily visits. In addition, given the extent of alternative open spaces for recreational use in closer proximity to the site than the SAC (see `Alternative Open Space` below), use of the SAC by any new visitors from the site would be expected to be fairly infrequent; possibly once a month or sporadically (using the criteria terms of the 2013 visitor survey).
- 6.4.14. **Alternative Open Space.** It was accepted in granting residential development for 650 dwellings at Land at Kidnappers Lane, Cheltenham, at appeal (APP/B1605/W/14/3001717) that the presence of alternative open space within 3km of the application site would reduce the contribution of recreational pressure from the application site to Cotswold Beechwoods SAC (see paragraph 6.4.5). Accordingly, the presence of areas of alternative open space between the site and the SAC, for example Leckhampton Hill and Charlton Kings Common, Lineover Wood, and Cleve Common which offer a range of walks in the wider local area, would likely absorb recreational pressure arising from the development of the site.

¹³ *Ibid* Footnote 3 above.

- 6.4.15. **Conclusion.** Based on the above, it is considered the proposed development would likely result in a single, infrequent (possibly monthly or sporadically - using 2013 visitor survey terms), new visitor to the SAC for walking or dog-walking. Accordingly, the likely number of visits to the SAC arising from residents of the proposed scheme can be described as nugatory such that in turn any adverse effects from these visits would be negligible and lessened still further by existing management practices Natural England has successfully implemented at the SAC for at least the last 11-years.
- 6.4.16. In-combination effects that may occur with other plans or projects are considered unlikely, within the revised Cheltenham HRA screening report, to be of significance given policy mitigation proposed through the Gloucester City Council, Cheltenham Borough Council, and Tewkesbury Borough Council (GCT) Joint Core Strategy (Policies SD9 and IF3) and the Cheltenham Plan.
- 6.4.17. Accordingly, given the above analysis and nugatory effects arising from the proposal, in-combination recreational effects are considered unlikely to adversely affect the SAC. This conclusion is consistent with reasoning applied within the revised HRA screening report in regard to allocated sites which are of a relatively small size and located at least 8km from the SAC and the conclusions reached in regard to the previous planning application 17/00710/OUT for the site, and the consented developments discussed above at the section titled '*Consented Developments within Proximity to Cotswold Beechwoods SAC*'.

Air Quality

- 6.4.18. Nitrogen levels are reported within the revised Cheltenham HRA screening report to exceed the critical loads along the A46 which connects Cheltenham with the A417 to Gloucester and lies adjacent to part of the Cotswold Beechwoods SAC, such that given the sensitivities of the habitats (woodland and grassland) within the SAC to atmospheric pollutants, increased use of the A46 may contribute to reduced air quality at the SAC from increased nitrogen oxide deposition.
- 6.4.19. The revised Cheltenham HRA screening assessment discusses likely significant effect thresholds for emissions to the air, referring to the Design Manual for Roads and Bridges (DMRB) Volume 11¹⁴ guidelines, which states that only traffic flows with changes in daily flows by 1000 Annual Average Daily Traffic (AADT) or more, or HGV flows with a change of 200 AADT or more, warrant further investigation. None of the allocated sites within the Cheltenham Local Plan are considered likely to breach these load thresholds, accordingly neither would an increase in traffic arising from the proposed development. Notwithstanding this conclusion, there is potential for likely significant effects to occur in-combination with allocated housing in other plans. The revised HRA screening report therefore considered the Cheltenham Plan in the context of the GCT Joint Core Strategy and associated HRA report, and an Appropriate Assessment (AA) was undertaken to understand the possible significant impacts which may occur from short range atmospheric pollution on the Cotswold Beechwoods SAC.
- 6.4.20. The AA concluded that based on the distance between Cotswold Beechwoods SAC and allocated sites, the nearest being ~8km, a substantial increase in traffic on any road which goes within 200 metres of the designation is unlikely to occur. Accordingly, any risk of significant in-combination effects caused by atmospheric pollutants are also

¹⁴ <http://www.standardsforhighways.co.uk/ha/standards/dmr/vol11/index.htm>

considered unlikely. The application of this reasoning to the proposed development site at Oakhurst Rise would indicate that, in the absence of mitigation, likely significant effects on the Cotswold Beechwoods SAC from atmospheric pollutants are also not anticipated alone or in-combination with other plans or projects.

6.4.21. This conclusion is in line with consultation responses received from Natural England in respect of the 2017 application at the site, which do not raise a concern in regard to air quality matters.

7. Stage 3 - Appropriate Assessment

- 7.1. The assessment herein concludes that the proposed development of the site will have no likely significant effect on the SAC, alone or in-combination with other plans or projects. Accordingly, no mitigatory measures are required.
- 7.2. Accordingly, there is no requirement to move to stage 3 and assess the proposals via an Appropriate Assessment.

8. Conclusion

- 8.1. This report sets out information to inform a Habitat Regulations Assessment in respect of forthcoming proposals at the site.
- 8.2. Three European designations have been identified within 20km of the site and are considered in terms of potential adverse effects arising from development. Effects on two of the designations, namely Dixton Wood and Bredon Hill SACs, can be readily screened out.
- 8.3. Cotswold Beechwoods SAC has been identified as being potentially more susceptible to disturbance from increases in recreational pressure and alterations in air quality. A screening assessment of the proposals has been undertaken which identifies that any adverse effects arising from increases in recreational pressure on the SAC would be nugatory, both alone and in-combination with other plans and projects.
- 8.4. In respect of air quality matters, roads within 200m of the SAC which are sensitive to deterioration in air quality are sufficiently distanced from the site and are therefore forecast to attract few trips such that any adverse air quality effects arising on the SAC would be insignificant, both from the proposals alone and in-combination with other plans and projects.
- 8.5. In conclusion, it is considered that effects on Cotswold Beechwoods SAC can be screened out such that there is no need for mitigation measures or to proceed to the Appropriate Assessment stage. However, should the competent authority wish to undertake an Appropriate Assessment the relevant information to inform such as assessment is contained within this report.

Appendix 5487/A:

Record of Conclusion of Screening Assessment – 17/00710/OUT

RECORD FOR A PROJECT WHICH WOULD NOT BE LIKELY TO HAVE A SIGNIFICANT EFFECT ON ANY EUROPEAN (INTERNATIONAL) SITE, EITHER ALONE OR IN COMBINATION WITH ANY OTHER PLAN OR PROJECT

Introduction and conclusion of the assessment

The outline planning application project **17/00710/OUT** for residential development was considered in light of the assessment requirements of Regulation 63 of the Conservation of Habitats and Species Regulations 2017. This was carried out by **Cheltenham Borough Council** which is the competent authority responsible for authorising the project and any assessment of it required by the Regulations.

Having carried out a 'screening' assessment of the project, the competent authority has concluded that the project would not be likely to have a significant effect on any European (international) site, either alone or in combination with any other plans or projects (in light of the definition of these terms in the 'Waddenzee' ruling of the European Court of Justice Case C – 127/02) and an appropriate assessment is not therefore required.

Natural England has been consulted on this project and its views on this Habitats Regulations Assessment conclusion.

Information used for the assessment

A copy of the list used to scan for and select European (international) sites potentially affected by the project was provided by Gloucestershire County Council's latest Baseline Habitats regulations Assessment Report available at <https://www.gloucestershire.gov.uk/planning-and-environment/ecology-and-landscape/habitats-regulations-assessment-hra/> . The following site below has been identified as relevant to the project 17/00710/OUT:

Cotswold Beechwoods - Special Area of Conservation (SAC)

Other information gathered for the assessment consisted of:

- The planning application documents which are viewable at https://www.cheltenham.gov.uk/info/42/planning/595/planning_applications_-_submit_view_and_comment_online .
- Conservation Objectives for Cotswold Beechwoods SAC Site Code: UK0013658, Natural England, 2016
- Site Improvement Plan: Cotswold Beechwoods (IPENS), Natural England, 2015

The screening of the project

A summary of the outcomes of the screening process consists of this record and the following documents:

- **Habitats Regulations Assessment information requested from All Ecology, letter dated 28th March 2018**
- Ecological advice requested and received by Cheltenham Borough Council from the Principal Ecologist at Gloucestershire County Council, memo dated 15th March 2018,
- Statutory Nature Conservation Organisation advice requested and received from Natural England, letter dated 1st March 2018
- Habitats Regulations Assessment information by All Ecology, letter dated 9th November 2017

Public access and disturbance was identified as a potential threat to H9130 Beech forests on neutral to rich soils (Site Improvement Plan, Natural England 2015). According to Natural England's Site Improvement Plan the measure to counteract this threat is to 'minimise impact of recreational use, especially mountain biking, horse riding and dog walking. After analysis the views of ecological consultant All Ecology were concurred with by Cheltenham Borough Council. This was that any recreational impact arising from the proposed development project would only be possible to have negligible effects and be unlikely to affect the conservation objectives of the Cotswold Beechwoods SAC.

No other potential impacts likely to have a significant effect on a European Site were identified.

Given the conclusion here the partly overlapping *Cotswold Commons & Beechwoods Site of Special Scientific Interest (SSSI)* is also considered by the competent authority to not be likely to be significantly affected if the development proposal were to be implemented as proposed.

Mitigation measures

In reaching the conclusion of the assessment the competent authority took the following mitigation measures into account:

- The provision of greenspace and its aftercare as part of the development which would be secured by planning obligations.
- There are closer and alternative accessible areas of greenspace for recreation for the future residents to use.

Assumptions and limitations

The screening conclusion necessarily relies on some assumptions and it was inevitably subject to some limitations. Most of the assumptions and limitations would not affect the conclusion but the following points are recorded in order to ensure that the basis of the assessment is clear.

- That the development described will be as presented in the planning application submissions.
- Given a negligible effect is concluded a consideration of in-combination effects with other plans and projects is deemed unnecessary.
- The professional judgements of statutory consultees and specialist advisers are considered to be reasonable.

Dated: 4th April 2018
Cheltenham Borough Council

Appendix 5487/B:

Email from Natural England dated 25/09/2018

Dan Walker

From: Muller, Antony (NE) <Antony.Muller@naturalengland.org.uk>
Sent: 25 September 2018 16:15
To: Dan Walker
Cc: Enquiries (NE)
Subject: Re: Cotswold Beechwoods Special Area of Conservation (SAC)

Dear Dan

Thank you for your email dated 18.9.18 asking about the latest visitor survey information for the Cotswold Beechwoods Special Area of Conservation (SAC).

Natural England is pleased to report that a visitor survey of the SAC has been commissioned very recently and is programmed to be completed by the end of this winter. Until then however options in terms of visitor survey data for the SAC are limited. Natural England's advice to the LPAs concerned is to base their decision-making on the most up to date available information. As part of ongoing dialogue with the Gloucester City, Cheltenham and Tewkesbury (Joint Core Strategy) Local Planning Authorities we have proposed that they refer to the visitor survey commissioned in respect of the North Brockworth development (Perrybrook - application reference 12/01256/FUL - Appendix 7 (Nov 2013) of the Ecology Solutions report dated March 2014 submitted to 'Inform an appropriate assessment of the impacts on the Cotswold Beechwoods SAC etc') as part of an interim approach to HRA of residential development i.e. until such time as the data from the new survey is available. This advice has been shared with the rest of the Gloucestershire borough and district LPAs.

I hope this information is helpful.

Kind regards

Antony

Antony Muller

Lead Adviser

Planning for a Better Environment – West Midlands Area Team

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<http://www.naturalengland.org.uk/>

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

Natural England offers two chargeable services – The Discretionary Advice Service ([DAS](#)) provides pre-application, pre-determination and post-consent advice on proposals to developers and consultants as well as pre-licensing species advice and pre-assent and consent advice. The Pre-submission Screening Service ([PSS](#)) provides advice for protected species mitigation licence applications.

These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, reduce the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

Appendix 5487/C:

Natural England VAM Statement

Views About Management



A statement of English Nature's views about the management of Cotswold Commons & Beechwoods Site of Special Scientific Interest (SSSI).

This statement represents English Nature's views about the management of the SSSI for nature conservation. This statement sets out, in principle, our views on how the site's special conservation interest can be conserved and enhanced. English Nature has a duty to notify the owners and occupiers of the SSSI of its views about the management of the land.

Not all of the management principles will be equally appropriate to all parts of the SSSI. Also, there may be other management activities, additional to our current views, which can be beneficial to the conservation and enhancement of the features of interest.

The management views set out below do not constitute consent for any operation. English Nature's written consent is still required before carrying out any operation likely to damage the features of special interest (see your SSSI notification papers for a list of these operations). English Nature welcomes consultation with owners, occupiers and users of the SSSI to ensure that the management of this site conserves and enhances the features of interest, and to ensure that all necessary prior consents are obtained.

Management Principles

Broadleaved semi-natural woodland

There are many different ways in which broadleaved woodland can be managed to conserve its value for wildlife. The following gives broad views on a range of regimes that may be appropriate on your site.

A diverse woodland structure, with open space, a dense understory, and a more mature overstory is important. In beech dominated woodlands, the structure is likely to be similar but with a more dense canopy and consequently a less dense understory. A range of ages and species within and between stands is desirable. Some dead and decaying wood, such as fallen logs, can provide habitats for fungi and invertebrates. However, work may be needed to make safe dangerous trees in areas of high public access. Both temporary and permanent open spaces benefit groups of invertebrates such as butterflies. They may require cutting to keep them open, and should be of sufficient size to ensure that sunny conditions prevail for most of the day.

Felling, thinning or coppicing may be used to create or maintain variations in the structure of the wood, and non-native trees and shrubs can be removed at this time. To avoid disturbance to breeding birds the work is normally best done between the beginning of August and the end of February. Work should be avoided when the

ground is soft, to prevent disturbing the soil and ground flora. Normally successive felling, thinning or coppicing operations should be spread through the wood to promote diversity, but where there is open space adjacent plots should be worked to encourage the spread of species that are only weakly mobile. Natural regeneration from seed or stump regrowth is preferred to planting because it helps maintain the local patterns of species and the inherent genetic character of the site.

Deer management and protection from rabbits or livestock are often necessary. Whilst light or intermittent grazing may increase woodland diversity, heavy browsing can damage the ground flora and prevent successful regeneration. Invasive species, such as sycamore, should be controlled.

Parts of a wood should be left unmanaged to benefit species that do best under low disturbance or in response to natural processes. Within these areas some trees will eventually die naturally and dead wood accumulate.

Calcareous grassland

In order to maintain a species-rich sward and its associated insects and other invertebrates, calcareous grassland requires active management. Without management it rapidly becomes dominated by stands of rank grasses, such as Tor-grass. These grasses, together with the build up of dead plant matter, suppress less vigorous species and lower the diversity of the site. Eventually, the site will scrub over. Traditionally, management is achieved by grazing. The precise timing will vary both between and within sites, according to local conditions and requirements. These may include stock type or the needs of particular plants or animals; certain invertebrates, for example, can benefit from the presence of taller vegetation. However, grazing should generally aim to keep a relatively open sward without causing excessive poaching. Light trampling can be beneficial by breaking down leaf litter and providing bare patches for seed germination and some invertebrates. An element of managed scrub, both within and fringing calcareous grassland can be of great importance to certain birds and invertebrates, but excessive scrub should be controlled.

Scrub

Scrub habitats are low-growing communities where the main woody components are bushes or small trees, such as hawthorn, blackthorn and juniper. Scrub supports a wide variety of species and ecological communities. In particular, the transitional zone between scrub and other habitats, such as woodland and grassland, can be important for wildlife, especially invertebrates.

Often, scrub is a transitional stage that will develop into woodland if unmanaged. Maintaining structural diversity and a mosaic of age classes within areas of scrub is important for maintaining the diversity of species the scrub is able to support. For example, hawthorn scrub supports the greatest variety of bird and insect species in the early and middle stages of growth.

Scrub can be managed using rotational cutting, which should aim to maintain a mosaic of patches at different stages of growth. Scrub can also be cut in small patches to create an intimate mixture of scrub and grass.

Juniper scrub in particular is an important scrub habitat and one that has become increasingly scarce in England. Management should aim to maintain it where it occurs.

All habitats

The habitats within this site are highly sensitive to inorganic fertilisers and pesticides, applications of which should be avoided both within the site itself and in adjacent surrounding areas. Herbicides may be useful in targeting certain invasive species, but should be used with extreme care.

landscape planning • ecology • arboriculture

The logo for Aspect Ecology, featuring the word "aspect" in a white, lowercase, sans-serif font. A thin, white, diagonal line is positioned above the letter "p", extending from the top of the letter to the right.

aspect

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