

**Clarification of and evidence relating to habitat mapping at Tynning Hill, Radstock as requested by the Inspector at the Examination hearing session of the 13/10/16.**

In response to the Inspector's request to have sight of the revised key and Diagrams 6 and 7 in the Somer Valley volume of the Placemaking Plan proposed by the Council, and clarification of what evidence is held for Habitat Mapping at Tynning Hill, the following is submitted:-

- 1) Two revised diagrams are provided here to replace Diagrams 6 and 7 within Volume 4 (Somer Valley) of the Placemaking Plan. Changes to the key are made to reflect the changes set out in the Schedule of Rolling Changes CD/PMP/DM29. A change to the habitat map in Diagram 7 is proposed to reflect the Council's position regarding modifying the extent and status of habitat at Tynning Hill as articulated at the 13/10/16 hearing session. The evidence to support this is listed in paragraph 4 below.
- 2) In addition, revised diagrams 4 and 5 for Volume 3 (Keynsham) are also provided in accordance with the Schedule of Rolling Changes CD/PMP/DM29. The changes here only affect the diagram keys and ensure consistency of diagrams through the plan.
- 3) It should be noted that these diagrams are included in the plan as illustrations and do not constitute part of the Policy Map. Habitat mapping is relevant to the Placemaking Plan Policies Map for Policy NE5. This shows Ecological Networks across the district, and includes the mapping of both Local BAP habitats and UK Priority Habitats.
- 4) The Evidence to support the revised habitat boundary and status for land at the Tynning is as follows:
  - Tynning Batch is listed as a "Site of Interest" within the Coal Tips of Wansdyke 1995 report (CD/PMP/DM35)
  - The site is included within the inventory of Post Industrial Sites produced through the Post-Industrial Sites Local Habitat Action Plan (CD/PMP/DM33). This work was completed by a Post Industrial Site working group made up of members from Bristol Environmental Records Centre, Wessex Ecological Consultancy; Duchy of Cornwall; Forest of Avon, Bath Naturalists, and Cam Valley Wildlife Group, with Avon Wildlife Trust acting in a consultative capacity. Basic data sheets were recorded for each site (CD/PMP/DM34)
  - The Ecological surveys submitted as part of the planning application at this site describe habitats within the modified boundary but excluding the batch itself as: Rank Grassland; Tall Ruderal Vegetation; Dense Scrub; Species-rich Grassland and Pioneer habitats. These habitats are contiguous and amount to

habitat area greater than 0.25Ha. The habitats present therefore meet the criterion for UK Priority Habitat as set out in UK Biodiversity Action Plan Habitat Descriptions for Open Mosaic Habitat on Previously Developed Land (OMHPDL) (CD/PMP/DM36).

- The Invertebrate Surveys submitted as part of the application site was limited to one days survey but 4 key species were identified. The OMH survey Handbook clarifies that “single survey visits will not provide sufficient information to determine whether an important invertebrate assemblage is present within a known OMHPDL site.” The identification of 4 key invertebrates at this location on a limited part of the site and from only one days survey effort is therefore significant. Importantly the invertebrate survey states “three of the key invertebrates recorded within the application area would be expected to be present elsewhere in contiguous habitats”. This is key to the habitat status of the wider site. The contiguous habitats would include the tall ruderal habitat; scrub and batch habitats included within the council’s revised site boundary.
- Evidence from 2014 Aerial photographs shows that a significant area of the batch habitat comprises open habitat with areas of bare ground; pioneer grassland and scattered scrub. The Council’s ecologist visited the batch in September 2016 and can confirm that significant areas of open batch habitat remain. Furthermore explanatory note 5 in the UK Priority Habitat Descriptions states “continuous blocks of closed plant community greater than 0.25Ha would be classified as habitat other than OMHPDL, although those containing very fine-grained mosaics might qualify”. Closed canopy habitats can therefore be included with UK Priority Habitat OMHPDL.
- Email advice from Jamie Robins, BugLife Conservation Officer 12/10/15, is as follows *“A look at the Google Earth aerial image suggests that as you said, the spoil heap to the west is most definitely OMHPDL. Essentially as you suggest, there seems to be continuous OMHPDL from the west end of the site by the spoil heap, to the east where the former built area and current ruderal area ends. Though do also note that the edges of the grasslands and woodland also effectively contribute to the site-wide mosaic and are functionally part of the OMHPDL areas”*
- The ecological survey submitted as part of the planning application together with evidence from a site visit and discussion with Julian Authur (Phoenix Land Solutions ecologist) strongly suggest that the land that would be excluded from the LBAP habitat Post industrial Site by this mapping change comprises largely closed grassland habitat associated with past agricultural, and old orchard use as opposed to past industrial use.



Evidence from 2014 Aerial Photograph

Revised Diagrams 4&5 of Placemaking Plan Volume 3 (Keynsham) and  
6&7 of Volume 4 (Somerset Valley)







