

Hugo house  
Spring CHE Ltd  
The Old Post Office  
Market Place  
Chippenham,  
Wiltshire  
SN15 3HR

**Dyddiad/Date:** 17 March 2021

Annwyl / Dear Mr Hugo House,

**Development of National Significance (DNS) Shadow Habitats Regulation Assessment (HRA) Consultation – land to the East of the A48 and land to the South East of Tycroes.**

Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales (NRW) on the above Development of National Significance consultation which we received on 16 February 2021.

We have reviewed the shadow HRA and have the following recommendations:

**Page 4** – We suggest updating the summary explaining that there will be no open trenching in sensitive habitats.

**Page 6** - Again it should be documented that Marshy Grassland and sensitive habitats won't be trenched, and Horizontal directional Drilling will be used instead.

**Page 23** - 4.2.2. *No habitats of European Community Importance as defined within The Conservation of Habitats and Species Regulations 2017 were present within this site. Protected habitats of this type are not a consideration for this project.*

Due to the presence of Marshy Grassland in fields F8 & F13 this could be considered of European Community Importance. The fields may not be of SAC notification standard but they will be supporting the Marsh Fritillary butterfly

**Page 26** – 4.3.18. *Hedgerows and woodland have the potential to support Dormice and there are records for Dormice in the area. Woodland will remain intact although there is potential to impact hedgerow habitat supporting small numbers of animals. Mitigation is required.*

Clarity is required on why mitigation is required when the Horizontal Directional Drilling will be under the hedges and should not cause disturbance.

**Page 30**- 5.3.5.- *Hedgerows have the potential to support small numbers of Dormice. To ensure no adverse effect on these animals.*

This contradicts 4.3.18 which states mitigation is required.

### Other Matters

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests, including environmental interests of local importance.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details

If you have any queries on the above, please do not hesitate to contact us.

Yn ddiffuant / Yours sincerely

**Rhian Isaac**

**Ymgynghorydd Cynllunio Datblygu/Development Planning Advisor  
Cyfoeth Naturiol Cymru / Natural Resources Wales**