

From: [REDACTED]
To: [REDACTED]
Subject: Re: Private - J1109
Date: 23 January 2023 21:42:31
Attachments: [image001.jpg](#)
[image002.png](#)

Hello [REDACTED]

Thank you for your comprehensive response. I will take this away for consideration as your advice in relation to the progression of SPG and advice to the applicant this site.

Myself or [REDACTED] will be back in touch should we need anything further in the immediate-term.

Thanks again

[REDACTED]

From: [REDACTED]@gov.je>
Sent: Monday, January 23, 2023 7:45:48 PM
To: [REDACTED]@gov.je>
Subject: RE: Private - J1109

Hi [REDACTED]

Thank you for the opportunity to comment on the attached sketch proposal for Field J1109. I have a number of comments to make which have been informed by discussions with colleagues and external ecological stakeholders.

From a biodiversity point of view the primary concern for all of us is the impact of proposals on bats and notably the Grey long-eared (GLE) bat maternity roost known to be present on the former Sion Methodist church site (now developed), adjacent to the north of the site. [Note this site and other nearby locations are also known to hold Common pipistrelle roosts as well as supporting other protected species and key habitat].

It's probably helpful at the outset to give you some context as to the importance of GLE bats and the GLE roost itself to the north of Field J1009 and why inappropriate use and development of this field might further impact this roost and the species locally, risking conflict with policy, legislation and broader multi-lateral environmental agreements. GLE bats along with all bat species in Jersey are fully protected under the Wildlife (Jersey) Law 2021. This includes their breeding and resting sites whether in use or not. In addition Jersey is a signatory to a number of multi-lateral environmental agreements for the conservation of habitats and species, amongst which is the EURObats agreement.

This GLE maternity roost was identified some years ago (2016/17) within the roof void space of the former Methodist church when it was being re-developed. At that time measures were put in place seeking to mitigate the impacts of the development on the GLE roost, in line with the survey findings and understanding of species behaviours and roost characteristics known at the time. Since then there has been a degree of ongoing post development monitoring and

increasing amounts of work undertaken Island wide (but incorporating data from this roost) as a part of the Jersey Grey Long eared Project (JGLEP). The increasing data and understanding of the species has enabled the JGLEP team to publish some initial findings (including an assessment of local roost characteristics) and develop a plan for further research, seen as critical in furthering the conservation of this species. The project was also recently awarded funding by the Jersey Community Foundation to undertake further research work. This reflects the fact that there is still much that we do not know about Jersey's GLE's. Whilst individually GLE bats can be encountered "relatively" frequently in surveys across the Island they are still considered particularly rare. Crucially GLE also act as something of an indicator species for other larger, less frequently detected bats such as Serotines or Greater Horse shoe bats and as such our increasing understanding and research of this species will do much to improve our knowledge of other locally occurring species. Inevitably any fluctuations in GLE populations are likely to be mirrored by these two important groups.

Some of the initial findings and views expressed to us by the JGLEP team are important and should feature as a major consideration in the approach to the appropriateness for development and design of fields such as J1109 and other ecologically sensitive locations, earmarked for housing across the Island. At present there is confirmation of just 4 GLE maternity roosts in Jersey, of which this is one (a number that is down from a suspected 6 roosts and likely down from historically higher numbers). There is a view (as yet unconfirmed) that there are likely to be at least 1 or 2 other maternity roosts Island wide but this has not yet been confirmed from research findings. This therefore makes the GLE maternity roost adjacent to J1109 a highly significant ecological feature. It is believed that this maternity roost holds approximately 15% of the breeding population of GLE's in Jersey, for the 4 confirmed roosts. [Note we aren't currently in a position to estimate what % of the UK population of GLE's are resident in Jersey but the JGLEP team believe, from the limited data collected to date, that there are somewhere in the region of 250-1,000 individuals locally, although this figure can't yet be corroborated].

The impact of the historic development at the former Methodist church, infrastructure changes notably in the form of increasing light levels and loss of historic roosts to development, here and across the Island, coupled with broader landscape scale changes in Jersey (all of which has been incremental and difficult to quantify) already points to the existing maternity roost being under pressure. Comments based on recent observations by the JGLEP team also indicate that last year's extreme heat had a significant impact on the GLE population, possibly halving existing bats numbers and juvenile recruitment. The likelihood of further disruptive weather events is high in the coming years and this will further exacerbate the pressures on this and other GLE roosts. There is now some data emerging suggesting that the number of bats within this roost may have dropped by 30-50% since the roost was first identified in 2016/17. This is a typical example of the combined impacts of the twin crises of biodiversity loss and climate change creating enhanced and possibly irreversible challenges.

The view accepted by all is that there is currently insufficient data to accurately characterise the roost in the former Methodist church and surrounding area including field J1109, accurately assess population size and then be able to understand fully the implications of the proposed housing scheme, as presented in the drawings you have shown us. Furthermore the consensus is that it's likely that it would take at least 3-4 years of extensive survey effort to obtain a sufficiently accurate picture of the locality and the implications of any development scheme, on the roost and the greater GLE population. Given the potential significance of the roost and

implications for its loss there are those who's overriding view is that despite its allocation for housing in the BIP, this site should infact not be developed, but kept in agriculture, to maximise the potential survival of the roost and the species locally.

If we focus particularly on the proposed scheme the view would be that a much larger proportion of the site should be given over to establishing wildlife "buffers" and wildlife "corridors" for the GLEs using the roost adjacent. This would see the incorporation of a minimum 20m deep boundary buffer to the north and west of the site – heavily planted and managed over the long term, although something even wider would be more valuable. Thickening up of the hedge line to the south and retention of the integrity of roadside boundary to the east, running parallel to the main road also should be seen as a priority. (as an aside I'm not sure why there is a need to create a new bus stop in the NE corner of the field when one already exists?). Any footpaths and entrances that impact or run parallel to these habitat corridors should be mindful of the roost protection requirements for existing trees and hedging. All habitat enhancement measures would need to be maintained and protected into the future. Ensuring funding for this through a mechanism such as a POA must also be considered.

The proposed scheme takes the view, of many recently developed housing schemes in Jersey that backing gardens tight up to site boundaries and any existing natural boundary features is a positive move resulting in lower disturbance and light levels. The reality is that all too often existing trees are removed by residents or housing providers, lighting increases as garden spaces become additional recreational areas and inevitably any level of disturbance (all be it low level residential disturbance) is likely to still be significantly higher than prior to development. These observations make the need for thicker more substantial boundaries more imperative. As already mentioned lighting remains a key issue and can have an over-riding impact on the ecology of bats. Minimising infrastructure and designing in accordance with Bat Conservation Trust guidelines is imperative. ([layout \(bats.org.uk\)](http://bats.org.uk)). In addition to sympathetic lighting schemes there are also any number of guides on incorporating features for wildlife in the built infrastructure, be that the buildings, surface drainage etc.

At this point I am aware that the applicant has engaged an ecologist to undertake a number of protected species surveys in advance of any application being submitted. I don't have access to these findings for reasons of client confidentiality and don't expect to until an application is submitted, but I would hope that some or all of the points raised in this email are addressed in any further proposals that might come forward or that are requested by your team in the absence of a development brief.

Finally for your information I think it's very likely that if and when an application is submitted the project team behind the Jersey Grey Long eared Project will submit a formal planning response.

Please do let me know if you'd like to discuss any of this further.

Kind regards

██████

████████████████████

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From: [REDACTED]@gov.je>
Sent: 16 January 2023 22:09
To: [REDACTED]@gov.je>
Subject: FW: Private - J1109

H [REDACTED]

I hope you are keeping well?

I attach a sketch proposal in respect of J1109 (a BIP H5 affordable housing site). I have some specific views on this, but think it would be helpful to take yours or another member of your team's view given that there is a known bat roost in the Methodist church.

To note, the planning policy team are looking at this instead of a conventional pre-app, given that the development briefs for the affordable housing sites have not yet been issued.

The idea of communal amenity space to the north east is with the aim to bring a number of benefits to the scheme, i.e.

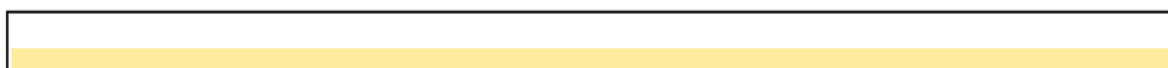
1. provide some relief to both the setting of the G1 LB to the north (the Methodist church)
2. create a wildlife corridor for the bat roost that exists in the Methodist church and enhance connection to the natural space to the west.
3. place it in convenient proximity to the bus shelter and natural crossing point.

My feeling is that both the quantum of space (around a third smaller than we had suggested) and a less than clear corridor to the natural space at the west, is that this may need some more work to address connectivity for the roost. I would however very much welcome your qualified view, if you wouldn't mind taking a look?

With thanks

[REDACTED]

From: [REDACTED]
Sent: 19 December 2022 11:59
To: [REDACTED]@gov.je>
Cc: [REDACTED]
Subject: Private - J1109



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H [REDACTED]

I hope your keeping well.

As discussed ref Field J1109, we have amended our feasibility sketches from the drawings initially discussed in our two meetings earlier this year. We have come up with an outline feasibility scheme that we think is a positive blend between maximizing the use of space between the need for affordable family housing, but also factoring in public amenity space for use by the wider parish.

We have kept the 'Green Lung' through the centre of the site as this provides a natural corridor between properties but also allows space to incorporate the % for art feature and also usable amenity space without negatively impacting density. We have allocated space on the North east of the site to incorporate a double petanque terrain with a covered pavilion, (Currently the only available petanque terrain in the parish of St. John is at the back of the car park at the Farmhouse/L'Auberge pub - so hopefully this would be a welcome addition to the parish) and a playground as would be required under BIP.

This has been included at the loss of 5 no. dwellings against the initial feasibility scheme. The additional benefit of this is also increased migration corridor for the bats in the converted Methodist Church.

Some high level statistics on the above adjustments are below;

- 40 dwellings
- Site Area: 11364m² (1.13 Hectares)
- Density: 35.39 dwellings per hectare
- Public amenity space 20% of overall site

MAC architecture has advised current guidance is 35 dwellings per hectare.

I think the key item from the above list is the Public amenity space. We discussed starting point for the SPG for the individual sites would be a third of the site should be considered for public use space. I think looking at how the current use of space is being presented, it demonstrates the most efficient use of the land for family housing, whilst being considerate to the nearby bat roost and also factoring in easily assessable and multi-generational public space.

I mentioned I used to live in Sion village estate and touched base with some of my old neighbours ref the scheme. I haven't shown them any designs but asked what their feelings were on the site and what they would feel comfortable with. Three different families all said they would strongly oppose apartments of any sort. On this basis we think we are currently correct in our assertion that a family housing development is more suited for this particular site and would receive the least amount of resistance.

I appreciate the above is purely for discussion but would welcome the opportunity to discuss in more detail how we may be able to work with the SPG team at this early stage so that we can look to deliver this site to market in the shortest time frame possible.

Whilst writing, I wonder if you have heard if there is any more progress on the SPG information being published in the new year or a new target timeframe.

Your time and input is appreciated.

Kind Regards

[Redacted]
Managing Director

[Redacted]

T. 01534 [Redacted]

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[Redacted]

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