

**Liv Rickman**

**From:** Julian Branscombe  
**Sent:** 10 October 2024 14:02  
**To:** Sam Whitehouse  
**Cc:**

**Subject:**

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Hi Sam,

Thanks for coming back to me with this query, in Jacob's absence. I'm an experienced ecologist (graduated in Zoology with Botany in 1990, and working professionally in this field since 1992). The footprint of this small development is largely taken up by the existing hide which needs replacement. The new hide will be slightly larger, and a medium-sized Grey Willow *Salix cineria* shrub (height and diameter of canopy around 3m) will need to be removed. This will provide an enhancement to the habitat, as there will be a further open area created. This Grey Willow (Sallow) is not part of an area of Wet Woodland as such – it is part of a scatter of invading Sallows along the pool margin which are advancing into reedbed and fen habitats.

The entire site is within the Higher Moors / Porth Hellick site which is an SSSI, and the works have been discussed with Natural England. The whole SSSI is part of a wider Higher Tier Countryside Stewardship agreement which commenced on 1<sup>st</sup> Jan 2024, and with which the development does not conflict. The removal of some willow shrubs, and small areas of ground disturbance in the wetland to diversify habitat and create "blue zone" niches are both identified as consented and desirable habitat management measures within the approved Management Plan that supports the HTCS programme.

The following UK Priority Habitats are represented within the freshwater part of this SSSI, and found within 100m of the development site:

- Eutrophic Standing Water
- Wet Woodland
- Lowland Fen
- Reedbed

It is my confident judgement that none of these priority habitats are affected in any way by the hide replacement, and the slightly greater footprint of the replacement hide. We shall be hoping for the limited ground disturbance from the installation works (which will be undertaken on foot, with no vehicular access to the SSSI required) to create niches for a range of annual and smaller / more delicate perennial wetland plants of marshy areas and shallow temporary freshwater. Those which have occurred following similar works elsewhere on the site include Bog Pimpernel, Ivy-leaved Crowfoot, Marsh St John's-wort, Ragged Robin, Yellow Sedge spp., Bog Pondweed and Brookweed, all of which are significant species in the Isles of Scilly, which has a limited range of native species due to natural island biogeography effects. Unfortunately, the invertebrate diversity of this site is not fully understood, with survey work to date limited to water beetles, Odonata, Lepidoptera, Aculeate Hymenoptera, and some of the more distinctive Dipteran families (Ian Beavis of Tunbridge Museum is a regular visitor) – the greater habitat heterogeneity, and greater availability of micro-scale water pockets and mud is likely to increase the invertebrate habitat value, as vegetation successional changes tend to dominate the site, despite rotational reed/fen cutting in places, and cattle grazing.

I hope this will satisfy you that formal provision of BNG is not required as part of this small hide replacement project.

All the very best, Julian

Cc Sophia Fraser, NE Cornwall Team

Julian Branscombe MCIEEM (he/him)  
Chief Executive, Isles of Scilly Wildlife Trust



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**From:** Sam Whitehouse <Sam.Whitehouse@southdowns.gov.uk>

**Sent:** 10 October 2024 10:12

**To:** Julian Branscombe [REDACTED]

**Cc:** 'Planning (Isles of Scilly)' <planning@scilly.gov.uk>

**Subject:** RE: P/24/057/FUL: Higher Moors Nature Trail.

Good Morning,

Please see the below email regarding planning application P/24/057/FUL in Jacobs absence.

Best,

Sam Whitehouse  
Monitoring & Enforcement Officer  
South Downs National Park Authority  
Phone: 01730 819287 | Mobile: 07557 853279

South Downs Centre, North Street, Midhurst, West Sussex, GU29 9DH  
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**From:** Sam Whitehouse

**Sent:** 10 October 2024 10:09

**Subject:** P/24/057/FUL: Higher Moors Nature Trail.

Good Morning,

I am the case officer who will be assessing application P/24/057/FUL for Higher Moors Nature Trail.

I have now initially reviewed the proposal, and require some additional ecology / biodiversity clarification. Please can you demonstrate if the proposal will, or will not, impact any priority habitat as outlined in the link below.

[UK BAP Priority Habitats](#) | [JNCC - Adviser to Government on Nature Conservation](#)

Should any amount of priority habitat be impacted then a statutory 10% gain in biodiversity will be required.

Best,

Sam Whitehouse  
Monitoring & Enforcement Officer  
South Downs National Park Authority  
Phone: 01730 819287 | Mobile: 07557 853279

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