# dendra

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## **Ecological Appraisal of:**

Eskdale Drive Jarrow NE32 4AA

## Prepared for:

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On behalf of:

South Tyneside Housing Ventures Ltd

Report Ref: Dunelm\_EskdaleDr\_Eco1.2

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## APPENDICES

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## **1.0 EXECUTIVE SUMMARY**

- 1.0.1 Dendra Consulting Ltd was commissioned by Dunelm Geotechnical & Environmental to undertake an ecological appraisal of land at Eskdale Drive, Jarrow. The survey was requested in order to support a planning application for the redevelopment of the site to accommodate 37 new residential dwellings.
- 1.0.2 There are thirteen designated nature conservation sites within 2km of the proposed development site, the closest of which is Primrose LWS located 345m to the west of the site. All thirteen designated nature conservations sites are physically separated from the proposed development site by residential areas, open green space, busy main roads and railway lines. Given the nature and small scale of the proposals, coupled with the setting, we would consider it highly unlikely that any development of the site would impact upon the designated sites.
- 1.0.3 The site mainly consists of areas of amenity grassland, bare ground and introduced shrubs. The habitats on site are all common and widespread and are of limited ecological value. The impact of the development upon plant species and habitats within the site is therefore likely to be negligible.
- 1.0.4 Overall, the site has very little potential for the majority of protected species and no evidence of protected species was noted during the site walkover survey; however the site does contain habitats suitable of supporting common nesting birds. It is therefore recommended that any shrub clearance works are undertaken outside of the bird nesting season of mid-March to August inclusive, or if this is not possible, these features are inspected by a suitably qualified ecologist immediately prior to works commencing.
- 1.0.5 No controlled invasive species were noted on or adjacent to the site.
- 1.0.6 The overall impacts of the proposed development are considered to be low due to the low value of the habitats on site. Proportionate enhancement opportunities are recommended in the form of the use of native tree and shrub species being incorporated within any soft landscaping scheme for the site. It is also recommended that bat boxes, are incorporated into the development.

## 2.0 INTRODUCTION

## 2.1 Background & Scope

2.1.1 Dendra Consulting Ltd was commissioned by Dunelm Geotechnical & Environmental to undertake an ecological appraisal of land at Eskdale Drive, Jarrow. The survey was requested in order to support a planning application to re-develop the site, as per Section 2.2, below.

## 2.2 Details of Proposals

2.2.1 It is proposed to develop the site for residential housing. Approximately 37 properties with associated gardens and parking areas are shown on the current plans.

## 2.3 Field Survey Methodology, Timing and Personnel

- 2.3.1 A site walkover survey was conducted on 16<sup>th</sup> December 2016 in accordance with the standard Phase 1 Habitat Survey methodology (JNCC, 2010). The walkover field survey was carried out both across the site and, where necessary, over surrounding land, in order to establish broad habitat types and features of ecological interest that would provide potential for, or display evidence of, protected species. This information was then mapped on Appendix 2 and used to determine the need for more detailed surveys.
- 2.3.2 The survey was undertaken by Sarah Edwards, who is an experienced ecologist and full member of the Chartered Institute of Ecology and Environmental Management. Weather conditions during the survey were overcast, wet and cold.
- 2.3.3 Trees within the site and/or with the potential to be affected by the development were visually assessed in terms of their potential to support protected species. Similarly, any buildings on site to be affected by the development were assessed in terms of their potential to support bat

species, adhering to guidance issued by the Bat Conservation Trust (Collins 2016).

2.3.4 During the site walkover survey a check for controlled invasive plant species listed under Schedule 9 (part ii) of the Wildlife and Countryside Act 1981 (as amended) was made. Under this Act, it is an offence to cause the spread or relocation of species such as Japanese knotweed *Fallopia japonica*, Himalayan balsam *Impatiens glandulifera* and giant hogweed *Heracleum mantegazzianum*.

# 2.4 Supporting Data

2.4.1 The Environmental Records Information Centre (ERIC) North East was contacted for information regarding protected species and nature conservation sites within 2km of the proposed development site. Google Earth and the Multi Agency Geographic Information for the Countryside (MAGIC) website were accessed to study aerial imagery of the site and the surrounding area. An OS map was purchased and is attached as Figure 1.

## 3.0 SITE SURVEY AND ASSESSMENT

## 3.1 Site Location and Setting

3.1.1 The site is located along Eskdale Drive in Jarrow, South Tyneside. The approximate grid reference is NZ336634. The approximate altitude is 17m AOD. The site is predominantly bordered on all sides by busy main roads and areas of residential housing interspersed with areas of open green space. Individual trees and small woodland compartments are scattered throughout the general location within the patchwork of residential estates, business units and schools. The wider environment includes stands of woodland, rivers, streams, open green space and parkland. A narrow shelter belt woodland lies to the north of site. The nearest water course appears to be the River Don, which lies approximately 150m west of site. From the southwest to the north-west of site are a number of Local Nature Reserves containing stands of woodland, mature trees, rough grasslands and areas of wetland, creating a narrow wildlife corridor running from Bolden Colliery to the River Don Salt Marsh. Figure 1 shows the site location and surrounding area.

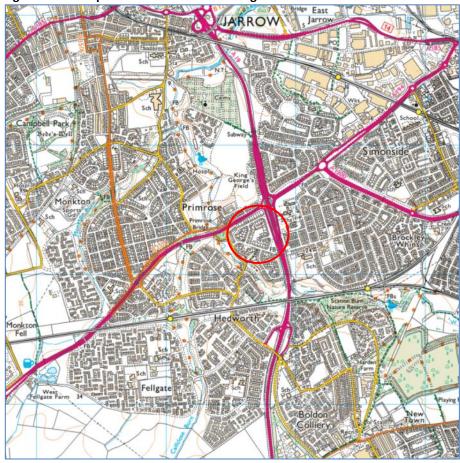


Figure 1 – OS map of the site and surrounding area. Not to scale.

# 3.2 Protected Species Records

3.2.1 Consultation data received from ERIC NE revealed no protected or priority species records from the site itself, but does show a number of protected species within 2km of the development site. The closest records of each protected species are shown in Figure 2, below.

Species	Grid ref	Approx distance from site and direction	Additional Comments
Great crested newt	NZ 349627	1.4km south-east	Boldon Colliery
			Reservoir 1983
Common pipistrelle	NZ 3418 6318	495m south-east	Active roost 2015
Pipistrelle sp.	NZ 338 628	485m south	Roost of 68 in 2003
European otter	NZ 33496 63174	235m south	River Don
Water vole	NZ 334634	205m west	River Don
Kingfisher	NZ 33 63	580m west	Calfclose Burn
Eurasian badger	-	-	-

Figure 2 Closest protected species records as provided by ERIC NE.

3.2.2 In addition to those species above afforded legal protection, Figure 3 outlines those species recorded by ERIC NE within a 2km radius which are listed in the Natural Environment and Rural Communities (NERC) Act (2006) and the Durham Biodiversity Action Plan.

Species	NERC	Local BAP
Hedgehog	$\checkmark$	✓
Water shrew		✓
Lesser redpoll	$\checkmark$	
Reed bunting	$\checkmark$	✓
Starling	$\checkmark$	✓
House sparrow	$\checkmark$	✓
Grasshopper warbler	$\checkmark$	
Snipe		✓
Gray partridge	$\checkmark$	
Small heath	$\checkmark$	
Wall	$\checkmark$	
Dingy skipper	$\checkmark$	✓
Four species of moth	$\checkmark$	

Figure 3 – Records of NERC and local BAP priority species recorded within 2km search area

## 3.3 Statutory and Non-Statutory Nature Conservation Sites

3.3.1 There are no statutory or non-statutory nature conservation sites within the site boundary. Those designated sites within 2km of the proposed development site are provided in Figure 4.

Site	Status *	Approx distance from site
Primrose	LWS	345m west
Primrose Nature	LWS	435m north-west
Reserve		
Hedworth Dene	LWS	455m south
Inverness Road	LWS	630m south-west
Station Burn	LWS	840m south-east
Cemetery Road	LWS	1.2 north
Straker Street	LWS	1.3 north
Newton Garths	LWS	1.4km south-east
River Don Salt Marsh	LWS	1.5km north
Calf Close Burn	LWS	1.6km south
Monkton Pond & Wood	LWS	1.7km south-west
Lakeside Inn	LWS	1.7km south-west
Boldon Colliery former	LWS	1.9km east
Railway Line	2005	1.5km Cast

Figure 4 – Designated wildlife sites within 2km.

LWS - Local Wildlife Site

## 3.4 Site Walkover Survey

- 3.4.1 The majority of the site consists of areas of amenity grassland and patches of bare ground, created by housing having recently been removed in preparation of the proposed redevelopment of the site. A small number of scattered introduced shrubs are located along the fence line of the southern and eastern site boundaries. In total, three habitat types were identified under the Phase 1 Survey Handbook definitions. These are:
  - Amenity Grassland (J1.1)
  - Bare ground (J4)
  - Introduced shrub (J1.4) not mapped.

# 3.4.2 Amenity Grassland (J1.2)

Large areas of the site are occupied by species poor amenity grassland. This includes areas cleared of housing and narrow strips of vegetation bordering the roads and footpaths around the site (Photographs 1 -4). These areas appear regularly mown, creating a short, species poor sward. Perennial ryegrass (*Lolium perenne*) dominates, with Creeping buttercup (*Ranunculus repens*), Dandelion (*Taraxacum agg.*) and Clover (*Trifolium sp.*) common. Herbaceous plants such as Daffodil (*Narcissus pseudonarcissus*) and Foxglove (*Digitalis purpurea*) were also noted scattered throughout the site. Other ornamentals were also present, predominantly along the site boundaries however due to the time of year these were unidentifiable.

# 3.4.3 Bare Ground (J4)

Large areas of the site consist of bare ground, in the form of patches of disturbed ground, recently cleared of housing, garages and hard standing made up of an asphalt access road and flagged stoned paths (Photographs 1 and 4).

# 3.4.4 Introduced Shrubs (J1.4)

Individual shrubs and bushes were noted to be scattered along parts of the eastern and southern site boundaries (Photograph 2). The shrubs are mainly

of a garden variety such as Laurel, Laburnum *(Laburnum Sp,)* and Privet *(Ligustrum ovalifolium)*. Areas of introduced shrubs were not mapped due to their small size and scattered locations.

# 3.5 Controlled Invasive Species

3.5.1 No evidence of invasive plant species, such as Japanese knotweed, giant hogweed or Himalayan balsam, was found on site.

# 3.6 Limitations

3.6.1 Although the survey was undertaken outside of the optimal survey period of late April to mid-October (JNCC, 2010), it is believed that an accurate representation of the site has been made due to the common and widespread nature of the habitats present and the competency of the surveyor. As the survey was undertaken during the winter months, it is possible that some species, such as plant species, may be under-represented. However it is very unlikely that a more comprehensive species list would affect the classification or evaluation of the habitats present.

Photograph 1 – Looking south across the site showing areas of amenity grassland and areas recently cleared of buildings.



Photograph 2 – Looking south across the site showing shrubs around the site boundary.





# Photograph 3 – Looking north-west across the site showing areas of amenity grassland

Photograph 4 – Areas of bare ground having recently been cleared of garages.



#### 4.0 PROTECTED AND PRIORITY SPECIES RISK ASSESSMENT

#### 4.1 Legal Status

- 4.1.1 This assessment focuses on those species afforded full protection under the Conservation of Habitats and Species Regulations 2010 (as amended), the Wildlife and Countryside Act 1981 (as amended) and the Protection of Badgers Act 1992. Also included within this assessment are those species considered to be of local and/or national importance through their designation as a local Biodiversity Action Plan (BAP) species or via their listing within Section 41 of the Natural Environment and Rural Communities Act 2006. A very brief summary of the protection that the current legislation provides is as follows:
- 4.1.2 The Conservation of Habitats and Species Regulations 2010 make it illegal to:
  - Deliberately capture, injure or kill a European Protected Species (EPS).
  - Deliberately disturb an EPS.<sup>[\*]</sup>
  - Damage or destroy a resting place used by an EPS.

<sup>[\*]</sup>Disturbance of includes in particular any disturbance which is likely to:

- Impair their ability to survive, breed, reproduce, rear or nurture their young, hibernate or migrate.
- Affect significantly the local distribution or abundance of the species to which they belong.
- 4.1.3 The Wildlife and Countryside Act 1981 makes it illegal to:
  - Intentionally kill, injure or take any wild bird.
  - Intentionally take, damage or destroy the nest of any wild bird whilst it is in use or being built.
  - Intentionally take or destroy the egg of any wild bird.
  - Damage, destroy or obstruct any structure or place used for shelter by animals listed on schedule 5 of the act.

- Disturb animals listed on Schedule 5 when occupying a place used for shelter.
- 4.1.4 The Protection of Badgers Act 1992 makes it illegal to:
  - Kill, injure or take a badger.
  - Cruelly ill treat a badger.
  - Interfere with a badger sett.
- 4.1.5 Under the Natural Environment and Rural Communities (NERC) Act (2006), all local authorities have a statutory obligation to conserve and enhance biodiversity when exercising their functions, including planning and development decisions. As such, this assessment also considers those priority species listed under Section 41 of the Act.

# 4.2 Preliminary Risk Assessment

4.2.1 From the results of the Phase 1 Survey site walkover, the habitats present both on site and within the locality, the protected species records provided by the local records centre and the known current distribution of species across the UK, it is concluded that the site has limited potential for the majority of protected species. The site does not contain any watercourses suitable for species such as Otter (Lutra lutra), Water vole (Arvicola amphibius), fish (including Eel Anguilla Anguilla, Lamprey Petromyzon marinus and Lampetra sp.) and White-clawed crayfish (Austropotamobius *pallipes*). There are no ponds within 500m of the site, and no records of Great crested newt (Triturus cristatus) within 1km, thereby greatly reducing the likelihood of encountering this species on site. The habitat is unsuitable for reptiles, being situated within an urban environment with the majority of the site heavily disturbed with little suitable basking or foraging habitat. Red squirrel (Sciurus vulgaris), although once common in South Tyneside, are now considered largely absent; the site does not fall within a Red squirrel protection area or 5km buffer zone and does not contain sufficient quantities

of suitable habitat to support a viable population. There are no Badger (*Meles meles*) setts and no signs of foraging Badgers were noted on site. There are no buildings or trees containing suitable openings for nesting Barn owl (*Tyto alba*) and little foraging habitat for this species on site. However, the site is considered potentially suitable for some protected and priority species, and these species have been given due consideration as outlined below.

# 4.3 Bats (*Chiroptera spp.*)

- 4.3.1 There are no buildings or trees within the site. Neighbouring trees located along the site boundaries were assessed for their potential to contain roosting bats. The majority of trees bordering the site are semi-mature and they do not have the potential to contain roosting bats due to a lack of potential roosting features, such as woodpecker holes, rot holes, cracks, splits, ivy or lifted bark. Therefore under current industry guidance (Collins, 2016) the trees adjacent to site have been assessed as holding negligible potential to contain roosting bats.
- 4.3.2 Data provided by ERIC NE has shown that bats, predominantly Pipistrelles, are known to be present within the surrounding landscape; suitable foraging habitat is present within commuting distance of the site. Records indicate two pipistrelle roosts have been recorded within two separate properties, located approximately 485m south and 495m to the south-east in 2003 and 2015 respectively.
- 4.3.3 Foraging habitat within the site is considered to be of negligible quality, under current industry guidelines (Collins, 2016). Overall, it is concluded that bats do not pose a constraint to development of the site.

## 4.4 Birds

- A number of bird species were noted on site during the site walkover survey; 4.4.1 Jackdaw (Corvus monedula), Common blackbird (Turdus merula), Robin (Erithacus rubecula), and Woodpigeon (Columba palumbus) were noted on site or flying across the site. None of these birds are listed as being of conservation concern (JNCC, 2009) or listed as priority species in the Durham BAP. ERIC NE provided a number of records of rare and threatened birds within 2km of the site, the majority of which originate from along the River Don and Boldon Colliery Wood area. Species found within 2km of site include six red status birds of high conservation concern and ten amber status birds of medium conservation concern (JNCC, 2009). Of these, eight species are listed as priority species either under Section 41 of the NERC Act (2006) or within the Durham BAP: House sparrow (Passer domesticus), Lesser redpoll (Carduelis cabaret), Reed bunting (Emberiza schoeniclus), Snipe (Gallinago gallinago), Starling (Sturnus vulgaris), Grasshopper warbler (Locustella naevia), Grey wagtail (Motacilla cinerea) and Grey partridge (Perdix perdix). There is negligible suitable habitat on the site for the majority of rare and threatened bird species, although species such as Starling, House sparrow and Song thrush may visit the site. The development site does provides some limited habitat and nesting opportunities for common bird species in the form of areas of introduced shrub.
- 4.4.2 Overall, given the habitats present on site and the location of the proposed development on the edge of a residential area, the species present are likely to be more common in nature and less affected by human habitation. Therefore the development of the site is unlikely to be significant with regards to rarer bird species. However, the loss of an active nest would breach current legislation and therefore recommendations for the avoidance of the destruction of an active nest are outlined in Section 6 below.

## 4.5 Invertebrates

4.5.1 The ecological site walkover survey was conducted outside of the main flight and/or activity period for most invertebrates and no scarce or threatened invertebrates were noted. ERIC NE provided records of Wall (Lasiommata megera), Small heath (Coenonympha pamphilus), and Dingy skipper (Erynnis tages) butterflies within 2km of the site, however the site does not provide an abundance of suitable food plants or habitat for any of the above species. The site is likely to support generalist invertebrates due to the lack of specialist larval and adult food plants and lack of dead wood to support saproxylic species. The proposals involve the removal of amenity grassland, small areas of introduced shrub. Given the condition of these habitats the proposals are deemed to be unlikely to impact on rare or threatened invertebrates.

# 4.6 West European Hedgehog (Erinaceus europeus)

4.6.1 No hedgehogs or evidence of hedgehogs were noted on site during the site survey. ERIC NE provided thirty-six records of hedgehog within 2km of the site, a number of which originate from the Jarrow area, recorded from within parks, local residential gardens and on roads passing through the surrounding urban area. It is possible that hedgehog visit the site, although there are only limited foraging opportunities found within the within the site. The impact of the proposed development on this species is considered to be very low due to the size of the site, and the positioning of the proposed housing which will predominantly be positioned over areas previously occupied by buildings, amenity grassland or bare ground.

## 5.0 IMPACT ASSESSMENT

## 5.1 Statutory and Non-Statutory Nature Conservation Sites

5.1.1 There are thirteen designated nature conservation sites within 2km of the proposed development site, the closest of which is Primrose LWS located 345m to the west of the site. All thirteen designated nature conservations sites are physically separated from the proposed development site by a residential areas, open green space, busy main roads and railway lines. Given the nature and small scale of the proposals, coupled with the setting, we would consider it highly unlikely that any development of the site would impact upon the designated sites.

## 5.2 Habitats and Plant Species

5.2.1 Three types of habitat were recorded during the Phase 1 Survey. These are amenity grassland, introduced shrub and hard standing. These habitat types are common and widespread both locally and nationally, with limited ecological value. The impact of the development upon plant species and habitats is likely to be negligible.

# 5.3 Protected Species

5.3.1 Overall, only limited opportunities for protected species are offered, due to the small size of the site and the common and widespread habitat types found within. However, further consideration needs to be given to the following species.

## 5.3.2 <u>Nesting Birds</u>

Introduced shrubs and bushes on site provide nesting opportunities for common bird species. The removal of these areas of vegetation could therefore result in the loss of active nests, eggs or chicks and this constitutes an offence under the Wildlife and Countryside Act 1981 (as amended). Working methods should be adopted to avoid the destruction of active nests as per Section 6.2 below.

# 5.4 NERC Act and Local BAP Priority Species

5.4.1 No evidence of use by priority species, other than those already covered in the sections above, was observed during the site visit. Given the common and widespread nature of the habitats present, and the limited ecological value of such habitats, the impact of the development on NERC Act and Local BAP priority species is likely to be negligible.

# 5.5 Post Development Interference Impacts

5.5.1 The proposals to develop the site for residential use will result in an increase in light, noise and general human disturbance. However, the site is located within a built up urban area, surrounded by residential areas with similar levels of disturbance. This increase is unlikely to be significant when compared with ambient levels. No significant post development impacts are predicted.

## 6.0 RECOMMENDATIONS AND MITIGATION

## 6.1 Nesting Birds

6.1.1 All vegetation clearance works should be undertaken outside of the bird nesting season of mid-March to August inclusive. If it is considered necessary to undertake the works during the bird nesting season, the site will require an inspection by a suitably qualified ecologist immediately prior to commencement. **NOTE:** if active nests are found the works will not be allowed to proceed. This could impose a significant constraint on the development timetable. Therefore our primary recommendation is that the works are undertaken outside of the nesting season.

# 6.2 Enhancement Features

- 6.2.1 To enhance the site for biodiversity, it is recommended that where possible, any tree planting scheme should make maximum use of native species. Suitable species include, but are not restricted to, hawthorn, hazel, holly, rowan, downy birch, silver birch and dog rose. Larger tree species such as oak and ash should only be planted where a suitable stand-off distance (minimum 15m) can be applied to prevent tree/building conflicts in the future.
- 6.2.2 As a proportionate enhancement measure we recommend the incorporation of bat roosts into the walls of some of the properties. An example is the Habibat bat box shown in figure 5 below. The boxes can be custom faced with bricks to match the bricks on the buildings, and they do not allow bats into the building. This type of box should be placed at least 3m from ground level, preferably 5 metres, and not directly above or adjacent to doors or windows. We recommend a total of 5 boxes and the exact locations can be agreed as a planning condition.

# Figure 5 – Habibat bat box.



## 7.0 SUMMARY OF IMPACTS OF MITIGATION

Proposed activity	Characteristic of impact without mitigation	Nature and Probability of impact without mitigation	Proposed Mitigation/Enhancement	Nature and Probability of impact with mitigation
	Loss of small site of limited ecological value	Negligible impact at site level – Highly likely	Tree and shrub planting to maximise use of native species	Neutral impact – Highly likely
Site clearance	Direct loss of active birds' nests	Negative impact at site level – Unlikely	Vegetation clearance to be undertaken outside of bird nesting season OR site to be inspected by an ecologist prior to removal.	Neutral impact – Highly likely

## Impact assessment criteria (Adapted from CIEEM 2006, 2016)

Certain/Highly likely – 95-100% chance of occurrence

Probable – 50-95% chance of occurrence

Possible – 5-50% chance of occurrence

Unlikely – less than 5% chance of occurrence.

## 8.0 REFERENCES

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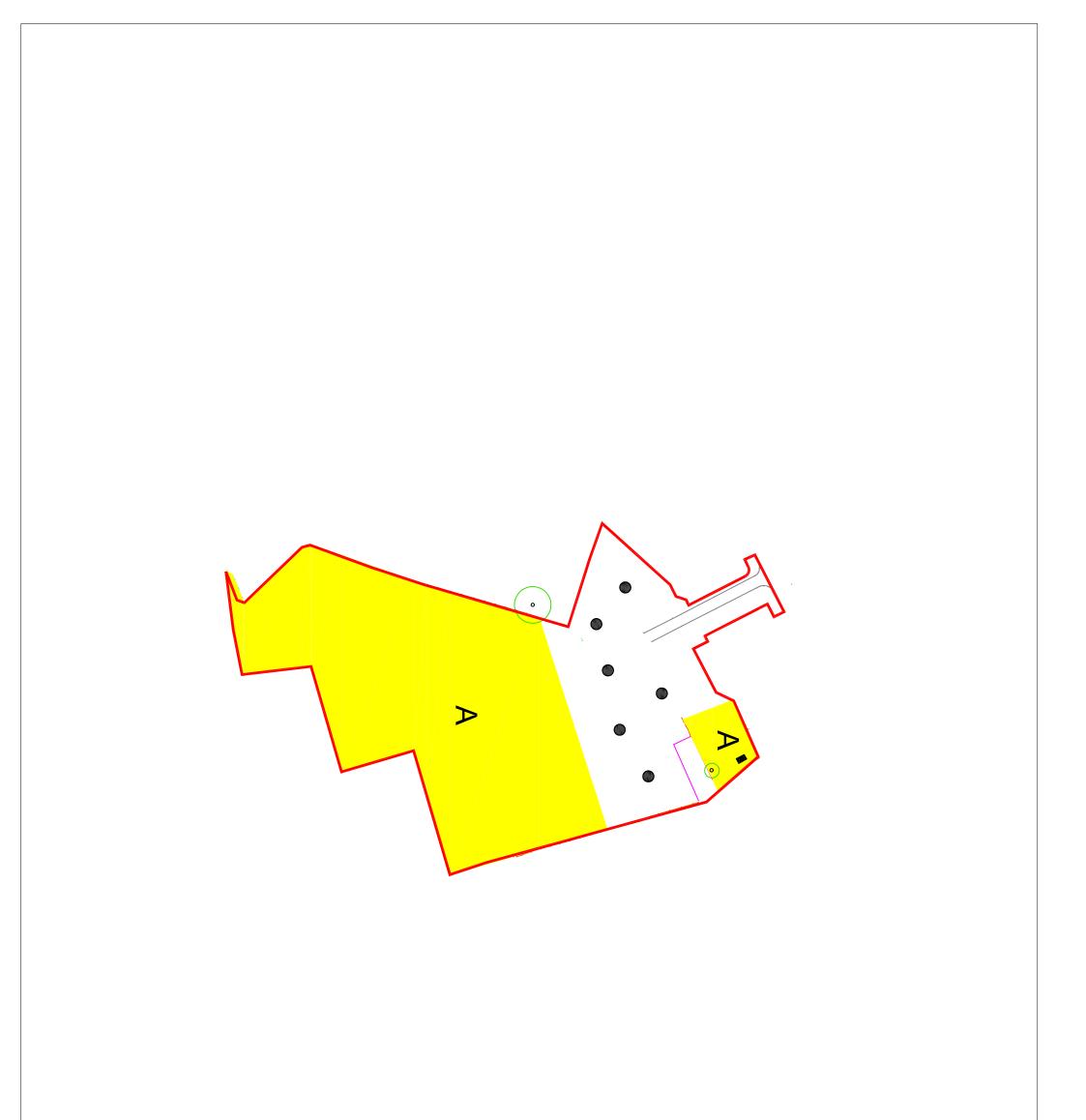
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## **Report end**

#### **APPENDIX 1 – SPECIES LIST**

Common Name	Botanical Name
TREES & SHRUBS	
Alder	Alnus glutinosa
Silver Birch	Betula pendula
Cypress	Chamaecyparis Sp.
lvy	Hedera helix
Apple	Malus spp.
Laurel	Prunus laurocerasus
Dog rose	Rosa canina
Rose	Rose sp.
Bramble	Rubus fruticosus
Corkscrew willow	Salix sp.
Elder	Sambucus nigra
Sorbus	Sorbus Sp.
Privet	Ligustrum ovalifolium
GRASSES, RUSHES, SEDGES	
Cocksfoot	Dactylis glomerata
Yorkshire fog	Holcus lanatus
Perennial rye-grass	Lolium perenne
Poa grass	Poa Spp.
-	
HERBACEOUS PLANTS, FERNS	
Yarrow	Achillea millefolium
Cow parsley	Anthriscus sylvestris
Daisy	Bellis perennis
Rapeseed	Brassica napus
Hedge bindweed	Calystegia sepium
Shepherd's Purse	Capsella bursa-pastoris
Hairy Bitter-cress	Cardamine hirsuta
Mouse-ear	Cerastium fontanum
Creeping thistle	Cirsium arvense
Spear thistle	Cirsium vulgare
Cotoneaster Sp	Cotoneaster sp.
Foxglove	Digitalis purpurea
Willowherb	Epilobium sp.
Cleavers	Galium aparine
St john's wort	Hypericum perforatum
Ribwort Plantain	Plantago lanceolata
Greater Plantain	Plantago major
Meadow buttercup	Ranunculus acris
Creeping buttercup	Ranunculus repens
Broad leaved dock	Rumex obtusifolius
Ragwort	Senecio jacobaea

Groundsel	Senecio vulgaris	
Smooth Sow thistle	Sonchus oleraceus	
Lamb's-ear	Stachys byzantina	
Chickweed	Stellaria media	
Dandelion	Taraxacum agg	
Clover	Trifolium spp.	
Scentless mayweed	Tripleurospermum iodorum	
Common nettle	Urtica dioica	
Daffodil	Narcissus pseudonarcissus	
BIRDS		
Woodpigeon	Columba palumbus	
Jackdaw	Corvus monedula	
Robin	Erithacus rubecula	
Blackbird	Turdus merula	



2nd February 2 1:1000 @ A3 Dendra Cons 41A Front Sacrist Durha DH7 6. el/Fax: 0191 nail: info@de www.dendr	Project Details: Eskdale Drive Jarrow NE32 4AA Prepared for: Dunelm Geotechnical & E Somerville House St John's Road Meadowfield Durham DH7 8TZ Report ref: Dunelm_EskdaleDr_Eco	<u>Key</u> J1.2 Amenity grassland J4 Bare ground Site boundary	Phase 1 H
ulting Ltd Street on m JS 3719636 a.co.uk a.co.uk	Environmental		<u>Appendix 2</u> se 1 Habitat Plan