Preliminary Ecological Appraisal and Preliminary Roost Assessment

212 Swakeleys Road, Uxbridge, UB10 8AY

Vigilant Security Services UK Ltd

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Industry Guidelines and Standards

This report has been written with due consideration to:

- Chartered Institute of Ecology and Environmental Management (2017). Guidelines for Preliminary Ecological Appraisal. 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2018). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Version 1.1. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2017). Guidelines on Ecological Report Writing. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2020). Guidelines for Accessing, Using and Sharing Biodiversity Data in the UK. 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- British Standard 42020 (2013). Biodiversity – Code of Practice for Planning and Development.
- British Standard 8683:2021 (2021). Process for Designing and Implementing Biodiversity Net Gain.

Proportionality

> The work involved in preparing and implementing all ecological surveys, impact assessments and measures for avoidance, mitigation, compensation and enhancement should be proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development. Consequently, the decision-maker should only request supporting information and conservation measures that are relevant, necessary and material to the application in question. Similarly, the decision-maker and their consultees should ensure that any comments and advice made over an application are also proportionate.
>
> The desk studies and field surveys undertaken to provide a Preliminary Ecological Appraisal (PEA) might in some cases be all that is necessary.
>
> (BS 42020, 2013)

Executive Summary

Arbtech Consulting Limited was instructed by Vigilant Security Services UK Ltd to undertake a Preliminary Ecological Appraisal (PEA) and Preliminary Roost Assessment (PRA) at 212 Swakeleys Road, Uxbridge, UB10 8AY (hereafter referred to as "the site"). The survey was required to inform a planning application for Erection of new dwelling with associated parking and landscaping following demolition of existing dwelling (hereafter referred to as "the proposed development").

The following is work you will need to commission to comply with planning policy and legislation. Further information, along with opportunities for biodiversity enhancement, are outlined in Table 8 of this report.

Feature	Survey Results Summary	Impact Assessment	Recommendations
Designated sites	There are five statutory sites within 2km of the site, the closest being Frays Valley Local Nature Reserve (LNR) located 610m west from the site. The site lies within the impact risk zone for Fray's Farm Meadows Site of Special Scientific Interest SSSI and Denham Lock Wood SSSI. The proposed development type is not listed as a possible high risk with regard to this designation. Furthermore, the closest Sites of Importance for Nature Conservation (SINC) is located 0.34km north-west of the site.	No impacts to designated sites are anticipated due to the small scale and distance of the proposed development from such sites (where known) as well as the urban location of the site with surrounding physical barriers.	Best practice measures to minimise the possibility of pollution must be implemented during construction.
Habitats and flora	There are no notable habitats within the site but six habitats are present within 2km of the site, the closest being deciduous woodland located 340m west from the site. The habitats within the site are common and widespread and have low ecological value.	No impacts to any notable habitats are anticipated due to the small scale and distance of the proposed development from such habitats as well as the urban location of the site with surrounding physical barriers. The proposed development will result in the loss of a small area of vegetated garden. However, this will be compensated by the addition of new trees, a pond, a wildflower meadow and 0.022ha of new grassland.	Best practice measures to minimise the possibility of pollution must be implemented during construction. Retained trees should be protected in line with the measures outlined in the British Standard "Trees in Relation to Design, Demolition and Construction to Construction - Recommendations" (BS 5837) (2012).

Reptiles	The habitats recorded on site are suboptimal as the site is predominately hard standing and vegetated garden, which may provide foraging opportunities but is very open and exposed which increases the risk of predation. The scattered scrub on site has encroached over hardstanding; this is suboptimal for reptiles due to an absence of a subterranean structure limiting refuge opportunities.	Vegetated garden and scrub over hard standing will be removed during construction. The loss of such habitats is likely to be inconsequential to local reptile populations owing to their low value and the presence of more extensive habitat locally. However, site clearance could result in the death or injury of reptiles, if present.	A precautionary working method will be implemented during construction.
Foraging and commuting bats	Scattered could be used by local bat populations for foraging and commuting. These could also be used by bats dispersing from nearby roosts outside of the site.	The proposed development will result in the loss of two trees but given the presence of more extensive areas of foraging and commuting habitat in the locality, this is likely to be inconsequential for bats. The proposed development will include the use of lighting which could spill on to bat roosting, foraging or commuting habitat and deter bats from using these areas.	A low impact lighting strategy will be adopted for the site during and post-development.
Badger	Although no evidence indicating the presence of badgers was recorded during the site survey, the site does have connectivity to the wider landscape for badgers. As such, the future presence of badgers foraging and commuting for transient periods cannot be discounted.	The proposed development is predominantly located over the existing building and hardstanding curtilage of limited ecological value. Given the limited vegetation removal required to facilitate the development in addition to the presence of suitable habitat in the wider landscape, proposed habitat removal is likely to be inconsequential for the local badger population. However, construction activities could result in the death or injury of badgers if present.	A precautionary working method will be implemented during construction.
Hedgehog	Although no evidence indicating the presence of hedgehogs was recorded during the site survey, the site does have connectivity for the wider landscape for hedgehogs. As such, the future presence of hedgehogs	The proposed development is predominantly located over the existing building and hardstanding curtilage of limited ecological value. Given the limited vegetation removal required to facilitate the development in addition to the presence of suitable habitat in	A precautionary working method will be implemented during construction.

	foraging and commuting for transient periods cannot be discounted.	the wider landscape, proposed habitat removal is likely to be inconsequential for the local hedgehog population.	
Birds	No evidence of nesting birds was observed internally or externally on any of the survey buildings. A bird's nest was observed within the pear tree on the western boundary. However, this tree will not be removed as part of the proposed plans.	Two trees will be removed during construction. The loss of such habitats is likely to be inconsequential to local bird populations owing to their low value and the presence of more extensive habitat locally. However, the proposed development could result in the destruction or the disturbance and subsequent abandonment of active bird nests.	Works (tree removal) should be undertaken outside the period 1st March to 31st August. If this timeframe cannot be avoided, a close inspection of the tree should be undertaken immediately, by qualified ecologist, prior to the commencement of work. All active nests will need to be retained until the young have fledged.

Contents

1.0 Introduction and Context

1.1 Background

Arbtech Consulting Limited was instructed by Vigilant Security Services UK Ltd to undertake a Preliminary Ecological Appraisal (PEA) and Preliminary Roost Assessment (PRA) at 212 Swakeleys Road, Uxbridge, UB10 8AY (hereafter referred to as "the site"). The survey was required to inform a planning application for Erection of new dwelling with associated parking and landscaping following demolition of existing dwelling(hereafter referred to as "the proposed development"). A plan showing the proposed development is provided in Appendix 1.

The aim of the PEA was to obtain data on existing ecological conditions, and to conduct a preliminary assessment of the likely significance of ecological impacts on the proposed development.

The aim of the PRA was to determine the presence or evaluate the likelihood of the presence of roosting bats, and to gain an understanding of how bats could use the site for roosting, foraging or commuting.

No previous ecology reports have been produced for this site by Arbtech Consulting Ltd or, to the author's knowledge, by any other consultancy.

1.2 Site Location and Landscape Context

The site is located at National Grid Reference TQ 06617 86180 and has an area of approximately 0.33ha comprising vegetated garden, scattered trees, hard standing, three buildings- the main dwelling (B1), guest building (B2) and an outbuilding (B3). It is surrounded by residential dwellings within Ickenham to the east and south, woodland to the west and arable fields to the north. A site location plan is provided in Appendix 2.

1.3 Scope of the Report

The PEA element of this report describes the baseline ecological conditions at the site, evaluates habitats within the survey area in the context of the wider environment and describes the suitability of those habitats for notable or protected species. It identifies possible ecological constraints as a result of the proposed development and summarises the requirements for further surveys and mitigation measures to inform subsequent mitigation proposals, achieve planning or other statutory consent and to comply with wildlife legislation.

The PRA element of this report provides a description of all features suitable for roosting, foraging and commuting bats and evaluates those features in the context of the site and wider environment. It further documents any physical evidence collected or recorded during the site survey that establishes the presence of roosting bats. It provides information on possible constraints to the proposed development as a result of bats and summarises the requirements for any further surveys to inform subsequent mitigation proposals, achieve planning or other statutory consent and to comply with wildlife legislation.

To achieve this, the following steps have been taken:

- A desk study has been carried out.
- A field survey has been undertaken to record baseline information on the site and surrounding area including habitat types and their suitability for notable or protected species, including roosting bats.
- Invasive plant and animal species (such as those listed on Schedule 9 of the Wildlife & Countryside Act) have been identified.

- Potential impacts on features of value, as a result of the proposed development, have been identified.
- Recommendations for further surveys and mitigation have been made.
- Opportunities for the enhancement of the site for biodiversity have been set out.

2.0 Methodology

2.1 Desk Study

The desk study included a review of the magic.gov.uk database for statutory designated sites within a 2km radius of the site. Landscape value and the presence of notable habitats as well as granted European Protected Species Licence (EPSL) and notable species records held on magic.gov.uk database has also been considered where these are within influencing distance of the site.

Existing biological records including notable species and non-statutory designated sites within a 2km radius were obtained from Greenspace Information for Greater London (GiGL).

2.2 Field Survey

The survey was undertaken by Beth Ellison-Perrett BSc (Hons) MSc, MRSB, Consultant (2023-11066-CL17-BAT) on 19th July 2023.

Preliminary Ecological Appraisal

An extended habitat survey was undertaken, following the methodology set out in *UK Habitat Classification User Manual* (UK Habitat Classification Working Group, 2018). All land parcels are described and mapped and, where appropriate, target notes provide supplementary information on habitat conditions, features too small to map to scale, species composition, structure and management. Botanical species lists were compiled with reference to the DAFOR scale (D = Dominant; A = Abundant, F = Frequent, O = Occasional, R = Rare).

For ease of reading, scientific names are ommitted from this report for widespread, ubiquitous and well-known species. Scientific names are only included where deemed necessary in conveying correct information to the reader, for example where common names differ regionally or in specialised, notable, unusual or challenging taxa, or if there is any ambiguity in identification (e.g where a species can only be identified to genus level).

During the survey, habitats were assessed for their suitability to support protected species, and field signs indicating their presence recorded. The assessment takes into consideration the findings of the desk study, the habitat conditions on site and in the context of the surrounding landscape, and the ecology of the protected species.

Preliminary Roost Assessment

The PRA focussed on three built structures which will be affected by the proposed development as well as providing an overview of the wider site and the surrounding landscape for bat roosting, foraging and commuting habitat.

<u>For any surveyed buildings</u>:

A non-intrusive visual appraisal was undertaken from the ground, using binoculars to inspect the external features of the buildings for features which bats could use for roosting, including access or egress points and for signs of bat use including droppings, scratch marks, insect remains and urine smear marks. An internal inspection of the buildings was also made, including the living areas and any accessible roof spaces, using a torch and ladders. The surveyor paid particular attention to the floor and flat surfaces, window shutters and frames, lintels above doors and windows, and carried out a detailed search of numerous features within the roof space.

<u>For any surveyed trees</u>:

A visual inspection was undertaken from ground level using binoculars to identify any possible roost features.

Suitability Assessment

Built structures and trees were categorised according to the likelihood of bats being present and the types of roost that the identified features could support. This is summarised in Table 1 and Table 2 below. Roost suitability is classified as high, moderate, low and negligible and dictates any further surveys required before works can proceed.

Table 1: Features of a building that are correlated with use by bats

Classification	***Feature of building and its context***
High	Buildings or structures with features of particular significance for larger numbers of roosting bats e.g. mines, caves, tunnels, icehouses and cellars. Habitat on site and surrounding landscape of high quality for foraging bats e.g. broadleaved woodland, tree-lined watercourses and grazed parkland. Site is connected with the wider landscape by strong linear features that would be used by commuting bats e.g. river and or stream valleys and hedgerows. Site is proximate to known or likely roosts (based on historical data). Buildings with high suitability could support roosts of high conservation value such as maternity or hibernation roosts.
Moderate	Buildings or structures with one or more features suitable for more regular roosting due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation value such as maternity or hibernation roosts. Continuous habitat connected to the wider landscape which could be used by bats for commuting such as lines of trees, linked gardens. Foraging habitat in the surrounding area such as trees, scrub, grassland or water.
Low	Buildings or structures with one or more features suitable for use sporadically by individual or small numbers of bats. Potential roost features may be suboptimal for reasons such as shallow depth, poor thermal qualities or upwards orientation with exposure to inclement weather or predators. Habitat suitable for foraging in close proximity, but largely isolated in the landscape. Or an isolated site not connected by prominent linear features.
Negligible	Unsuitable for use by bats.

Table 2: Features of a tree that are correlated with use by bats

Classification	***Feature of tree and its context***
Moderate to high (Difficult to separate moderate or high value trees from ground level without a close up inspection)	A tree with one or more potential roost sites that are obviously suitable for use by bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. Trees with high suitability could support roosts of high conservation value such as maternity or hibernation roosts.

Low	A tree of sufficient size and age to contain potential roosting features but with none seen from the ground or features seen with only very limited roosting potential to be used sporadically by individual or small numbers of bats. Potential roost features may be suboptimal for reasons such as shallow depth, poor thermal qualities or upwards orientation with exposure to inclement weather or predators.
Negligible	Unsuitable for use by bats.

2.3 Limitations

It should be noted that whilst every effort has been made to describe the baseline conditions within the survey area, and evaluate these features, this report does not provide a complete characterisation of the site. This assessment provides a preliminary view of the likelihood of protected species being present. This is based on suitability of the habitats on the site and in the wider landscape, the ecology and biology of species as currently understood, and the known distribution of species as recovered during the searches of historical biological records.

The ground level tree assessment was undertaken in summer when foliage was present on the trees and this obscured visibility in places.

These limitations have been taken into account during the evaluation of the site and requirement for further surveys and mitigation.

3.0 Results and Evaluation

3.1 Designated Sites

Details of any statutory and non-statutory designated sites within a 2km radius of the site, including their reasons for notification, are provided in Table 3 below. The site lies within the impact risk zone for Fray's Farm Meadows Site of Special Scientific Interest SSSI and Denham Lock Wood SSSI. The proposed development type is not listed as a possible high risk with regard to this designation.

Table 3: Statutory and non-statutory designated sites within 2km radius of the site

Designated site name	Distance from site	Reasons for notification from Natural England
Frays Valley Local Nature Reserve (LNR)	610m west	The wildlife-rich Frays River meanders through the luxuriant Frays Farm Meadows SSSI. In spring, kingcups vividly pick out the damper areas and hard on their heels comes a splendid expanse of ragged-robin. Snipe; water vole and harvest mouse; kingcups and ragged robin; slow worm; willow; banded demoiselle
Fray's Farm Meadows Site of Special Scientific Interest (SSSI)	610m west	The land was designated as SSSI because it represents one of the last remaining areas of relatively unimproved grassland habitat in the Greater London area. The condition of the grassland is generally good and the habitat exhibits a number of features of interest, including natural floodplain features such as tall sedge beds, areas of tall fen vegetation and vegetated ditches. The presence of several plants which are scarce in the Greater London area such as ragged robin, bottle sedge and brown sedge adds to the interest.
Denham Lock Wood Site of Special Scientific Interest (SSSI)	815m west	This area is designated as SSSI because it supports habitats which are scarce in the Greater London area floodplain woodland and swamp. The area is largely maintained through a policy of minimal intervention allowing natural processes, with an emphasis on maintaining very wet conditions. The majority of the area is dominated by a tall, dense canopy of crack willow and with patches of alder woodland. The ground layer is made up by plants characteristic of wet woodland such as lesser pond-sedge, hemp agrimony and yellow flag, and parts have a dense understory of young ash and willow trees.
Denham Country Park LNR	1045m west	A scenic and relaxing location on the banks of the rivers Colne, Misbourne and Frays, the park is home to a mix of wildlife. You may catch a glimpse of herons and kingfishers while in summer damselflies and dragonflies dart over the wet meadows.
Denham Quarry Park Local Nature Reserve (LNR)	1330m west	The park is home to a mix of wildlife. Visitors may catch a glimpse of herons and kingfishers while in summer damselflies and dragonflies dart over the wet meadows and Flooded quarry. Denham Quarry Park is close by to Frays Valley Local Nature Reserve in the Greater London area.

Designated site name	Distance from site	Reasons for notification from Natural England
Harefield Hall and The Lodge Sites of Importance for Nature Conservation (SINCs)	550m north-west	This is a complex site with a variety of habitats. The woodland forms part of the golf course and is dominated by pedunculate oak. Other less abundant species include English elm, common lime and ash over an understorey of yew, holly, cherry laurel and Portugal laurel, the latter two being introduced species once used as cover for rearing game-birds. The ground flora is sparse due to the dense shade, but includes bramble, male and broad buckler ferns and the locally scarce butcher's-broom. Adjoining the golf course woodland are the gardens of Harefield Hall, a large country house used as a corporate headquarters. There are many scattered trees, some native and some exotic, several of which are very old, including an impressive oak. An old orchard of apple trees over a species-rich sward is likely to be valauble for invertebrates. A small pond abuts the orchard and holds a reasonable variety of wetland plants including yellow iris, gipsywort and bittersweet, with the surface blanketed in duckweed. The rest of the grounds have a range of habitats, including a small patch of dense yew woodland, more open woodland of oak, silver birch and elder with patches of sheep's fescue, grazed pasture, amenity grassland and shrubberies.
Common Plantation and Park Wood Sites of Importance for Nature Conservation (SINCs)	625m south	Common Plantation and The Clump lie to the west of the River Pinn and are split in two by Western Avenue (A40). The canopies of both stands are dominated by pedunculate oak, sycamore and ash. The understorey of both comprises abundant hawthorn, wych elm, English elm, elder, with frequent holly and yew in the northern section. Damp areas support grey, crack and goat willows. The woodland floors are dominated by bramble, bluebell and cow parsley, with some bracken and hogweed. The invasive Indian balsam is frequent in the damper areas.
Mad Field Covert, Railway Mead and the River Pinn Sites of Importance for Nature Conservation (SINCs)	715m east	Railway Mead is an area of herb-rich grassland to the south of the railway, bounded by mature hedgerows of mainly oak and blackthorn. The grassland supports abundant red fescue, perennial rye-grass with frequent false oat-grass and Yorkshire fog. Herbs include abundant common knapweed, lady's bedstraw, white clover as well as autumn hawkbit, burnet saxifrage and tormentil. Green woodpeckers are regularly seen in this area. Mad Field Covert is a stand of oak and ash woodland over elder, blackthorn and hazel. The ground flora is dominated by bramble and nettle and includes giant fescue and herb robert. The River Pinn is shallow and slow-flowing, with a silted bed and its banks are lined in parts by alder, crack willow and white willow interspersed with ash, English elm, field maple and dogwood. In one section, the river flows through woodland dominated by oak with hornbeam, wild cherry and sweet chestnut. Riparian herbs and grasses include hemlock, hairy brome and wood meadow-grass along with bramble and Himalayan balsam. The water supports occasional fennel-leaved pondweed, water chickweed, and fool's water-cress.

Designated site name	Distance from site	Reasons for notification from Natural England
Mid Colne Valley Sites of Importance for Nature Conservation (SINCs)	895m west	This section of the Colne Valley includes a diverse range of high quality habitats. Several waterways include the Frays River, from which 53 species of aquatic and wetland plants have been recorded. The unimproved wet pastures of Frays Farm Meadows (a Site of Special Scientific Interest and Local Nature Reserve managed by the London Wildlife Trust and Hillingdon Natural History Society) support a very rich flora, including locally uncommon species such as marsh-marigold (Caltha palustris) and ragged-robin. The invertebrate fauna includes the locally declining glow-worm. The meadows support wintering waders such as snipe, as well as a population of harvest mice. The adjacent Denham Lock Wood (also Site of Special Scientific Interest) is one of few wet alder-willow woods in London, and supports a rich fen flora including the very localised small teasel. Invertebrates here include the nationally rare species Desmoulin's whorl snail and the balsam carpet moth. The extensive flooded gravel pits are very important for breeding and wintering waterfowl, and also for passage migrants. Several of the gravel pits are part of a third Site of Special Scientific Interest. The site is important for its population of the specially-protected water vole and there are also recent reports of otters in the vicinity.
Uxbridge Common Meadows Sites of Importance for Nature Conservation (SINCs)	1105m south	The main part of the site comprises grasslands of locally-dominant false oat-grass, perennial rye-grass and Yorkshire fog with abundant sheep's sorrel and frequent yarrow. Hedgerows separating the sports fields are dominated by hawthorn with blackthorn and English elm. A shaw (a narrow strip of woodland) exists as a field boundary and may be a remnant of ancient woodland. The canopy is dominated by oak and hornbeam. Field maple, blackthorn, and hawthorn are the major understorey shrubs, with bramble, ivy, hairy brome and ground-ivy forming the ground flora. Woodland has developed along the railway embankment with crack willow and grey willow at the wetter base with English oak, ash and sycamore over hawthorn and English elm higher up the slopes.
Uxbridge Ponds Sites of Importance for Nature Conservation (SINCs)	1145m south	These three ponds in Uxbridge support important populations of amphibians, including the specially protected great crested newt in two of the ponds. Park Road Pond (Brearley Close Pond) has equal areas of open standing water and emergent vegetation. Uxbridge Common Pond is set in mown grassland and scattered trees and is dominated by reed sweet-grass and the highly-invasive New Zealand Pigmyweed as well as parrot's-feather. The northern edge of the common consists of sandy soil with an acid grassland and scrub flora. Abundant sheep's sorrel is present, with occasional gorse and broom. Both pond and common would benefit from appropriate management. Uxbridge College Pond is heavily shaded by grey willow, weeping willow and sycamore and covered by common duckweed. No emergent plants are visible. The pond supports great crested newts and common frogs. The surrounding woodland is contiguous with that of the railway embankment.

Designated site name	Distance from site	Reasons for notification from Natural England
Brackenbury Railway Cutting Sites of Importance for Nature Conservation (SINCs)	1155m north	This broad, wooded railway cutting provides pleasant, rural views for passengers. The dense tree and scrub cover is dominated by pedunculate oak, elder, and English elm with abundant ivy. The trees are mostly young, although there are a number of larger oaks. Areas of grassland are dominated by common couch and perennial rye-grass, with lesser burdock, weld and perforate St John's-wort.
West Ruislip Golf Course and Old Priory Meadows Sites of Importance for Nature Conservation (SINCs)	1260m north	The area to the west of the River Pinn comprises an old meadow and two narrow fields, at least one of which has not been grazed for a year or more. The Old Priory Meadow has rich plant diversity. The green lane along its eastern edge is flanked by hedgerows of native species dominated by hawthorn and English elm and separates it from another field, much wetter in nature, dominated by Yorkshire fog, meadowsweet and tufted hair-grass with occasional hairy sedge
London's Canals Sites of Importance for Nature Conservation (SINCs)	1300m west	London's canals support a wide range of aquatic flora, amongst which are found a number of locally uncommon species. These include narrow-leaved water plantain, rigid hornwort and shining pondweed, all species of clean, clear waters. Many waterside plants, including several London rarities, also grow on the brickwork and banks of the canal. The canals also support an important invertebrate fauna (including several species of dragon/damselflies), a diverse fish community, and breeding waterfowl. London's network of canals fulfill an important function in allowing nature into heavily built-up environments. The towpath and associated areas of waste ground, especially in East London, support a number of uncommon species of disturbed ground. The whole of the Grand Union Canal system in London, including the Regent's and Hertford Union Canals, is included in this single Metropolitan site.
Ickenham Pond Sites of Importance for Nature Conservation (SINCs)	1320m east	This small pond adjacent to High Road, Ickenham, has reasonable plant diversity in spite of the local dominance of exotic species. These include New Zealand pigmyweed and parrot's-feather. A variegated form of reed sweet-grass is locally abundant, as is great reedmace, with yellow iris and pendulous sedge frequent and occasional false fox-sedge. The pond edge also supports nettle and great willowherb.

Designated site name	Distance from site	Reasons for notification from Natural England
Ickenham Marsh, Austin's Lane Pastures and Freezeland Covert Sites of Importance for Nature Conservation (SINCs)	1590m east	A mosaic of fields, old hedges, woodlands, rivers and wetlands. Much of the grassland in the fields is currently or formerly grazed, resulting in a mosaic ranging from undergrazed to overgrazed (by horses). Dominant grasses include meadow foxtail, tufted hair-grass, false oat-grass and Yorkshire fog. Grassland flora includes meadowsweet, sneezewort and red bartsia. The fields also include unmanaged roughland, horse-grazed pastures with poached areas, and meadows which undergo sporadic hay cropping. The extensive native hedgerows are dominated by hawthorn and blackthorn, interspersed with pedunculate oak, dogwood, and crack willow. Some hedges have seasonally wet ditches with flora such as yellow iris and water pepper. Woodlands are dominated by pedunculate oak, with a dense canopy and shrub layer. The ground flora includes giant fescue, hairy brome and lesser spearwort. Freezland Covert is an area of dense damp woodland which provides habitats for a good range of birds, invertebrates and mosses.
Newyears Green Sites of Importance for Nature Conservation (SINCs)	1600m north	Newyears Green covert is a woodland believed to have been planted in the late 19th century. The canopy is dominated by pedunculate oak, ash and hornbeam over English elm, blackthorn, hawthorn and hazel. Also present is the locally scarce, buckthorn along with Midland hawthorn, spindle and field rose. The ground flora is dominated in parts by bramble and common nettle with some germander speedwell and violets.
Ickenham Moat Sites of Importance for Nature Conservation (SINCs)	1670m east	This large tree-filled and scrub-covered ditch is listed as an Ancient Monument by English Heritage. The damp shade, seasonal pools, marshy patches and fallen and standing decaying timber are likely to provide habitats for a wide range of invertebrates, and feeding areas and shelter for birds and mammals. The site is publicly accessible in part, and there is an English Heritage information board to the south west. It is owned by the Douay Martyrs Roman Catholic School which comes under the Archdiocese of Westminster.
Breakspear Road South Pond Sites of Importance for Nature Conservation (SINCs)	1800m north	A good quality secluded pond with some extensive marshy edges. Emergent and marginal vegetation covers about a third of the pond's area, principally soft rush, floating sweet-grass and reed canary-grass. The open water is shaded in part by trees such as alder and pedunculate oak to the south and west. Bramble and other scrub restricts access by horses grazed in the field to the north, and disturbance of the pond is therefore restricted.
Dew's Dell Sites of Importance for Nature Conservation (SINCs)	1845m north	This old quarry has great wildlife potential. The southern and middle areas are mostly woodland with some grassland at the woodland edges. The section south of the lane to the sailing centre is used as a 'combat' course, with sycamore and silver birch being co-dominant, with some pedunculate oak and wild cherry. Beneath these are blackthorn and elder, with much common nettle, bramble and occasional male fern.

3.2 Field Survey Results

The results of the field survey are illustrated in Appendix 3. The weather conditions recorded at the time of the survey are shown in Table 4.

Table 4: Weather conditions during the survey

Date:	19/07/2023
Temperature	20°C
Humidity	68%
Cloud Cover	90%
Wind	9mph
Rain	None

Habitats and Flora

The following habitats are present within and adjacent to the site:

- Vegetated garden (u1 231) with scattered trees (11)
- Developed land; sealed surface (u1b) with scattered scrub (10)
- Building (u1b5)
- Built linear feature (u1e) – brick wall (68) and fence (69)

A description and photographs of each habitat are provided in Table 5.

Table 5: Description and photographs of habitats within and adjacent to the site

Habitat type	Habitat description	Photograph
Vegetated garden (u1 231) with scattered trees (11)	To the north-west and south of the site are areas of vegetated garden, which is subject to mowing, resulting in a sward of approximately 5cm in length. Species composition is comprised of perennial ryegrass (D), cocks foot (D), Yorkshire fog (A), cut-leaved cranesbill (O), white clover (O), thistle (R), plantain (O), sorrel (O), creeping buttercup (O), cinquefoil (O), dandelion (O), red clover (O), self heal (R), birds foot trefoil (R), yarrow (R), herb Robert (R), ragwort (R), daisy (R) and green alkanet (R). A small area of this grassland will be affected by the proposed plans, however, this area is of low ecological value.	

	Along the boundaries of the vegetated grassland are scattered trees. Trees are semi-mature to mature in age and represent a fair to good structural condition. These are comprised of oak, poplar, apple, pear, ash, plum and cedar. The trees were assessed for their habitat value for roosting bats and nesting birds. The pear tree on the western boundary has a bird's nest within its branches. However, this tree will not be removed as part of the proposed plans. The apple tree and turkey oak to the south of the site will be removed as part of the proposed plans. These trees have negligible habitat value for roosting bats.	
Developed land; sealed surface (u1b) with scattered scrub (10)	Surrounding the buildings onsite and extending to the north and south-east of the site, are areas of hard standing. These areas are comprised of concrete slabs and tarmac and are of negligible habitat value for protected species. Additionally, areas of scattered scrub have developed on site over the hard standing to the north and north-west due to an absence of vegetation management. All scrub on site is dominated by bramble, alongside common nettle, hedge bindweed, creeping cinquefoil, poplar saplings.	

		
Building (u1b5)	There are three buildings onsite which were subject to a preliminary roost assessment (PRA). The results of the PRA are shown below (table 6).	
Built linear feature (u1e) – brick wall (68) and fence (69)	Along the south-eastern boundary of the site is a brick wall. The remaining boundaries are comprised of wooden panel fencing. These linear features are in good condition with no broken or missing sections.	

		

Fauna

Bats

The results of the PRA are provided in Table 6. No evidence of roosting bats was identified during the survey.

Table 6: Assessment of the suitability of the site for bats

Feature	Description	Photographs
Historical records	There are four EPSLs within 2km the site, involving soprano pipistrelle, daubentons and brown long eared bats. The closest EPSL is located 1125m south-west involving the destruction of a resting place for daubentons.	
Bat foraging and commuting habitat	There are scattered trees onsite which could be utilised by foraging and commuting bats. There is woodland to the east and south of the site which could be utilised by roosting and foraging bats. Additionally, there is open grassland to the north of the site which could be used by foraging bats.	

B1 –north-eastern and south-eastern elevations	B1 is a detached two-storey brick-built building with a cross-pitched and hipped and gabled roof clad in interlocking concrete roof tiles. The roof tiles are in very good condition with no raised tiles under which bats could roost. The doors and windows are UPVC and appear in excellent condition with no suitable bat roosting sites. The brickwork around the building is rendered and appears in excellent condition with no gaps or cracks in which crevice-dwelling bats could roost.	
B1 – north-western and south-western elevations	There are timber soffits and bargeboards around the building which are generally in good condition. There are flat roof sections located on the northern elevation of the building. The flat roofs are bitumen felt lined and are in very good condition with no gaps in which bats could roost.	

		
B1 – interior	There is one loft space within the main roof void of B1. The roof structure is built from modern timber beams including the ridge beam. The roof is lined half with bitumen felt and half with wooden sarking which are in very good condition with no gaps or tears. The floor of the loft space is lined with mineral wool insulation and there are timber boards in places. There are cobwebs around the ridge beam and roof to floor cobwebs which could indicate a lack of internal flying activity from void dwelling bats, such as brown long-eared bats. No daylight enters the loft space which indicates that it is well sealed. There is evidence of mouse activity including mouse droppings.	

		
B1 – suitability assessment	The building has negligible habitat value due to a lack of suitable roosting features.	N/A
B2 –north-eastern and south-eastern elevations	B2 is a detached two-storey brick-built building with a pitched and hipped roof clad in interlocking concrete roof tiles. The roof tiles are in very good condition with no raised tiles under which bats could roost. The doors and windows are UPVC and appear in excellent condition with no suitable bat roosting sites. The brickwork around the building is rendered and appears in excellent condition with no gaps or cracks in which crevice-dwelling bats could roost.	

B2 –north-western and south-western elevations	There are timber soffits and bargeboards around the building which are generally in good condition. The roof tiles on the north-western and south-western elevations are in good condition with no raised tiles in which bat could roost.	
B2 – interior	There is one loft space within the main roof void of B2. The roof structure is built from modern timber beams including the ridge beam. The roof is lined with bitumen felt which is in very good condition with no gaps or tears. The floor of the loft space is lined with mineral wool insulation and there are timber boards in places. There are cobwebs around the ridge beam and roof to floor cobwebs which could indicate a lack of internal flying activity from void dwelling bats, such as brown long-eared bats. No daylight enters the loft space which indicates that it is well sealed.	

B2 – suitability assessment	The building has negligible habitat value due to a lack of suitable roosting features.	N/A
B3 –south-eastern and south-western elevations	B3 is a detached single-storey wooden-built building with a pitched and gabled roof clad in bitumen felt lining. The roof lining is in good condition with no raised sections under which bats could roost. The doors and windows are wooden framed and appear in relatively condition with missing/broken glass within the panes. Although this does not create any suitable bat roosting sites, only access internally.	
B3 –north-eastern and north-western elevations	The building is clad in wooden weatherboarding which is in relatively good condition with no missing or broken sections under which bats could roost.	

B3 – interior	There is no loft space within B3 as the ceiling is vaulted. The roof structure is built from modern timber beams including the ridge beam. The roof is lined with wooden sarking which is in very good condition with no gaps or tears. There are cobwebs around the ridge beam. Daylight enters internally into B3 through the multiple windows on the north-western and south-eastern elevations. This creates high levels of light internally, reducing the suitability for void dwelling bats.	
B3 – suitability assessment	The building has negligible habitat value due to a lack of suitable roosting features.	N/A

Other Species

An assessment of the suitability of the site for protected or notable species is provided in Table 7.

Table 7: Assessment of the suitability of the site for protected or notable species

Species	Assessment of suitability	Biological records data
Amphibians	The MAGIC database returned evidence indicating the presence of great crested newts resulting from historic pond surveys undertaken in 2015 and 2017. These records are located 400m west and 430m south-west of the site. Additionally, there are four EPSL records for great crested newts within 2km of the site, located 1085m north, 1665m south and two 1670m south. A review of aerial imagery indicates the presence of one pond within 500m of the site, located 365m south-west. The pond is surrounded immediately by a small woodland on all sides which provides optimal	According to data collected by GiGL there is 1 record with 4 occurrences of great crested newts located 412m north-west and 1450m west.

	terrestrial opportunities for amphibians including foraging, commuting, refuge and hibernation opportunities and therefore great crested newts are unlikely to need to venture far beyond their core range. This is widely accepted to be 250m from a breeding pond (Langton et al, 2001). Additionally, there is further suitable habitat to the west of the pond, including woodland, open meadows and ponds. The pond and the results from the historic pond surveys are separated from the site by urban and agricultural infrastructure including tarmac roads, buildings, and extensive managed grassland, which is either grazed or regularly mown resulting in a short sward length. These landscape features are suboptimal for great crested newts due to a lack of refuge from predation. As a result, given the distance of this pond from the site, these landscape features are likely to represent a significant barrier to dispersal eliminating connectivity to the site for great crested newts. The habitats recorded on site are suboptimal as the site is mainly hard standing and vegetated garden which is mown to a short sward length and retains a homogenous structure which may provide foraging opportunities but is very open and exposed which increases the risk of predation.	
Reptiles	A review of the MAGIC database returned no granted EPSL records for reptiles within 2km of the site. The habitats recorded on site are suboptimal as the site is predominately hard standing and vegetated garden, which may provide foraging opportunities but is very open and exposed which increases the risk of predation. The site is enclosed by urban development to the east, south and west which represents a significant barrier to dispersal for reptiles likely to prevent colonisation from the wider landscape on these aspects. Further to this, the scattered scrub on site has encroached over hardstanding; this is suboptimal for reptiles due to an absence of a subterranean structure limiting refuge opportunities.	According to data collected by GiGL there are 1 record with 43 occurrences of slow worms, located between 778m west and 1531m east; 1 record with 4 occurrences of grass snakes, located 778m west and 1011m west and 1 record with 2 occurrences of common lizard located 1677m east and 1868m east.

Badgers	A review of the MAGIC database returned no granted EPSL for badgers within 2km of the site. Habitats recorded on site are assessed to provide foraging and commuting opportunities for badgers in the form of scattered scrub, albeit limited. However, no evidence indicating the presence of badgers was recorded during the site survey and no badger setts are present on or within 30m of the site. Although no evidence indicating the presence of badgers was recorded during the site survey, the site does have connectivity to the wider landscape for badgers. As such, the future presence of badgers foraging and commuting for transient periods cannot be discounted. However, the site is surrounded with fencing and brick walls along all boundaries of the site, preventing access onsite for badger. In addition, the site itself is flat with minimal vegetation and therefore has little to offer in the way of foraging or sett excavation habitat.	According to data collected by GiGL there are 5 records of badgers within 2km of the site.
Hazel Dormouse	No evidence of dormice was found within the site. It is not anticipated that dormice are present on the site due to the lack of suitable of the habitats present. Furthermore, for isolated habitats in the UK, research indicates that dormice require 20ha of woodland habitat to support a viable population (Bright *et al.* 1994). There are no areas of woodland present on or directly adjacent to the site that are big enough (20ha) to support dormice.	According to data collected by GiGL there are no records of dormice within 2km of the site.
Hedgehog	Habitats recorded on site are assessed to provide foraging, commuting, and refuge opportunities for hedgehogs in the form of scattered scrub, albeit limited. However, no evidence indicating the presence of hedgehogs was recorded on site. Although no evidence indicating the presence of hedgehogs was recorded during the site survey, the site does have connectivity for the wider landscape for hedgehogs. As such, the future presence of hedgehogs foraging and commuting for transient periods cannot be discounted.	According to data collected by GiGL there is 1 record with 17 occurrences of hedgehogs, with the closest record located 472m north-east.

Riparian Mammals	A review of the MAGIC database returned no granted EPSL records for riparian mammals within 2km of the site. The river Colne is located approximately 1260m west of the site, however, there is no evidence of otters or water voles onsite and no suitable habitat for riparian mammals to forage or create holts onsite. In addition, the site is surrounded on all boundaries with fencing and brick walls	According to data collected by GiGL there are no records of otters within 2km of the site. There are however, 1 record with 90 occurrences of water voles, with the closest record located 668m west.
Birds	No evidence of nesting birds was observed internally or externally on any of the survey buildings. A bird's nest was observed within the pear tree on the western boundary. However, this tree will not be removed as part of the proposed plans.	There are 60 records of birds within 2km of the site, including lesser redpoll, common sandpiper, skylark, kingfisher, swift, short-eared owl, goldeneye, dunlin, greenfinch, shag and herring gull.
Invertebrates	The site is suitable to common species of invertebrates.	There are 71 records of invertebrates within 2km of the site, including purple emperor, scarce chaser and common darter.

4.0 Conclusions, Impacts and Recommendations

4.1 Informative Guidelines

A summary of the relevant legislation and planning policies is provided in Appendix 4.

Likelihood of the Presence of Protected Species

Where physical evidence of the presence of protected species is indeterminate during the survey, the habitats on site are evaluated as to their likelihood to provide sheltering, roosting, foraging, basking or nesting habitat.

Where this report supports a planning application, the ecological interest of the study area (i.e. the area covered by the desk study and field survey) and the proposed development has also been evaluated in terms of the planning policies relating to biodiversity.

4.2 Evaluation

Taking the desk study and field survey results into account, Table 8 presents an evaluation of the ecological value of the site and also details any ecological constraints identified in relation to the proposed development which will comprise erection of new dwelling with associated parking and landscaping following demolition of existing dwelling.

Table 8: Evaluation of the site and any ecological constraints

Feature	Survey Results Summary	Impact Assessment	Recommendations	Biodiversity Enhancement Opportunities[1]
Designated sites	There are five statutory sites within 2km of the site, the closest being Frays Valley Local Nature Reserve (LNR) located 610m west from the site.	No impacts to designated sites are anticipated due to the small scale and distance of the proposed development from such sites (where known) as well as the urban location of the site with surrounding physical barriers.	Best practice measures to minimise the possibility of pollution must be implemented during construction.	None.

[1] The Local Planning Authority has a duty to ask for enhancements under the NPPF (2021).

	The site lies within the impact risk zone for Fray's Farm Meadows Site of Special Scientific Interest SSSI and Denham Lock Wood SSSI. The proposed development type is not listed as a possible high risk with regard to this designation. Furthermore, there are 15 non-statutory sites within 2km of the site, with the closest Sites of Importance for Nature Conservation (SINC) located 550m north-west of the site.			
Habitats and flora	There are no notable habitats within the site but six habitats are present within 2km of the site, the closest being deciduous woodland located 340m west from the site. The habitats within the site are common and widespread	No impacts to any notable habitats are anticipated due to the small scale and distance of the proposed development from such habitats as well as the urban location of the site with surrounding physical barriers. The proposed development will result in the loss of a small area of vegetated garden. However, this will be compensated by the	Best practice measures to minimise the possibility of pollution must be implemented during construction. Retained trees should be protected in line with the measures outlined in the British Standard "Trees in Relation to Design, Demolition and Construction to Construction - Recommendations" (BS 5837) (2012).	The following habitat creation and enhancement opportunities could be incorporated into the proposed development: • Native tree, hedgerow and shrub planting. • Planting of a wildflower meadow. • Creation of a wildlife pond.

	and have low ecological value.	addition of new trees, a pond, a wildflower meadow and 0.022ha of new grassland.		
Amphibians	A review of aerial imagery indicates the presence of one pond within 500m of the site, located 365m south-west. The pond is separated from the site by urban and agricultural infrastructure which are suboptimal for great crested newts due to a lack of refuge from predation. The habitats recorded on site are suboptimal as the site is mainly hard standing and vegetated garden which is mown to a short sward length and retains a homogenous structure which may provide foraging opportunities but is very open and exposed which increases the risk of predation.	Vegetated garden will be removed during construction. When georeferencing the proposed development plans over scaled mapping of the site, it is noted that the development area is likely to result in the loss or significant disturbance of 0.014ha of vegetated garden. If great crested newts are present within the pond 365m to the south-west of the site, this will constitute a loss of 0.014ha over 250m of a potential breeding pond. When completing the rapid risk assessment published by Natural England (Natural England 2015), the proposed development produces a **Green risk score**, which states: **Offence Highly Unlikely**.	None.	None.
Reptiles	The habitats recorded on site are suboptimal as the site is	Vegetated garden and scrub over hard standing will be removed during	Owing to the nature of the proposed development and the low potential for impacts to reptiles, further	The following habitat creation and enhancement opportunities

	predominately hard standing and vegetated garden, which may provide foraging opportunities but is very open and exposed which increases the risk of predation. The site is enclosed by urban development to the east, south and west which represents a significant barrier to dispersal for reptiles likely to prevent colonisation from the wider landscape on these aspects. Further to this, the scattered scrub on site has encroached over hardstanding; this is suboptimal for reptiles due to an absence of a subterranean structure limiting refuge opportunities.	construction. The loss of such habitats is likely to be inconsequential to local reptile populations owing to their low value and the presence of more extensive habitat locally. However, site clearance could result in the death or injury of reptiles, if present.	surveys are considered to be disproportionate. A precautionary working method will be implemented during construction, including the following measures: • A staged approach will be adopted for vegetation clearance, whereby the vegetation will be strimmed to 15cm and left overnight to allow any reptiles to disperse. The vegetation can then be cleared to ground level and must be maintained at this level for the duration of construction to deter reptiles from the working area. • Any rubble piles will be dismantled by hand and debris and brash will be stored on pallets or removed from the site to prevent reptiles from utilising these areas. • Any excavations will be covered overnight, or a ramp will be installed to enable any trapped animals to escape. • Any chemicals or pollutants used or created by the development should be stored and disposed of correctly according to COSHH regulations. • In the unlikely event that a reptile is identified, works must cease and advise must be sought from a suitably qualified ecologist.	could be incorporated into the proposed development which would be beneficial for reptiles: • Creation of reptile refugia and hibernacula using debris and brash from site clearance. • Planting of native scrub and grassland to increase foraging opportunities. • The creation of basking areas such as rock piles or areas of cleared ground with shelter nearby. • The creation of a wildlife pond.
Roosting bats (B1-B3)	B1, B2 and B3 have negligible value for roosting bats due to a lack of potential roost features. Additionally,	Bats are very unlikely to be roosting within these buildings and as such, there are not anticipated to be any impacts on roosting	In the unlikely event that a bat or evidence of bats is discovered during the development all work must stop and a bat licensed ecologist contacted for further advice.	The installation of two bat boxes at the site will provide additional roosting habitat for bats.

	according to data from GiGL there are 13 records of bats within 2km of the site, with the closest located 581m south-east. There are four EPSLs within 2km the site, involving soprano pipistrelle, daubentons and brown long eared bats. The closest EPSL is located 1125m south-west involving the destruction of a resting place for daubentons.	bats as a result of the demolition of this building.		The bat boxes will be installed on scattered trees onsite. Bat boxes should be positioned 3-5m above ground level facing in a south or south-westerly direction with a clear flight path to and from the entrance, away from artificial light. The bat boxes will be a specification suitable for crevice dwelling bats such as Vivara Pro Woodstone Bat Box or a similar alternative brand.
Foraging and commuting bats	Scattered could be used by local bat populations for foraging and commuting. These could also be used by bats dispersing from nearby roosts outside of the site.	The proposed development will result in the loss of two trees but given the presence of more extensive areas of foraging and commuting habitat in the locality, this is likely to be inconsequential for bats. The proposed development will include the use of lighting which could spill on to bat roosting, foraging or commuting habitat and deter bats from using these areas.	A low impact lighting strategy will be adopted for the site during and post-development, which will include the following measures: • Use narrow spectrum light sources to lower the range of species affected by lighting. • Use light sources that emit minimal ultra-violet light. • Avoid white and blue wavelengths of the light spectrum to reduce insect attraction and where white light sources are required in order to manage the blue shortwave length content they should be of a warm / neutral colour temperature <4,200 kelvin.	The following habitat creation and enhancement opportunities could be incorporated into the proposed development which would be beneficial for foraging bats: • The creation of a wildlife pond. • Planting of native tree, shrub and hedgerows to increase foraging opportunities.

			• Not use bare bulbs and any light pointing upwards. The spread of light will be kept in line with or below the horizontal. • Light spill will be reduced via the use of low-level lighting used in conjunction with hoods, cowls, louvers and shields. Lights will also be directional to ensure that light is directed to the intended areas only. • External lighting will be on PIR sensors that are sensitive to large objects only (so that they are not triggered by passing bats) and will be set to the shortest time duration to reduce the amount of time the lights are on. • Wall lights and security lights will be 'dimmable' and set to the lowest light intensity settings. There are several products on the market that allow the control of the light intensity and the duration that the lights are on. All lighting on the developed site will make use of the most up to date technology available.	
Badger	Habitats recorded on site are assessed to provide foraging and commuting opportunities for badgers in the form of scattered scrub, albeit limited. However, no evidence indicating the	The proposed development is predominantly located over the existing building and hardstanding curtilage of limited ecological value. However, approximately 0.014ha of vegetated garden will require removal to facilitate the development. Given the limited vegetation	A precautionary working method will be implemented during construction, including the following measures: • Any excavations will be covered overnight, or a ramp will be installed to enable any trapped animals to escape. • The use of night-time lighting will be avoided, or sensitive lighting design will be implemented to	None.

	presence of badgers was recorded during the site survey and no badger setts are present on or within 30m of the site. Although no evidence indicating the presence of badgers was recorded during the site survey, the site does have connectivity to the wider landscape for badgers. As such, the future presence of badgers foraging and commuting for transient periods cannot be discounted.	removal required to facilitate the development in addition to the presence of suitable habitat in the wider landscape, proposed habitat removal is likely to be inconsequential for the local badger population. However, construction activities could result in the death or injury of badgers if present.	avoid light spill on to retained habitats which badgers could use. • Any chemicals or pollutants used or created by the development should be stored and disposed of correctly according to COSHH regulations. • In the unlikely event that a badger sett is identified, works must cease and advise must be sought from a suitably qualified ecologist.	
Hazel dormouse	No evidence of dormice was found within the site. It is not anticipated that dormice are present on the site due to the lack of suitable of the habitats present.	No impacts are anticipated on hazel dormice as a result of the proposed development.	None.	None.
Hedgehog	Habitats recorded on site are assessed to provide foraging, commuting, and refuge opportunities for	The proposed development is predominantly located over the existing building and hardstanding curtilage of limited ecological value. However,	A precautionary working method will be implemented during construction, including the following measures: • A staged approach will be adopted for vegetation clearance, whereby the vegetation will be	The following habitat creation and enhancement opportunities could be incorporated into the proposed development to

	hedgehogs in the form of scattered scrub, albeit limited. However, no evidence indicating the presence of hedgehogs was recorded on site. Although no evidence indicating the presence of hedgehogs was recorded during the site survey, the site does have connectivity for the wider landscape for hedgehogs. As such, the future presence of hedgehogs foraging and commuting for transient periods cannot be discounted.	approximately 0.014ha of vegetated garden will require removal to facilitate the development. Given the limited vegetation removal required to facilitate the development in addition to the presence of suitable habitat in the wider landscape, proposed habitat removal is likely to be inconsequential for the local hedgehog population. However, construction activities could result in the death or injury of hedgehogs if present.	strimmed to 30cm and left overnight to allow any hedgehogs to disperse. The vegetation can then be cleared to ground level and must be maintained at this level for the duration of construction to deter hedgehogs from the working area. • Any excavations will be covered overnight, or a ramp will be installed to enable any trapped animals to escape. • The use of night-time lighting will be avoided, or sensitive lighting design will be implemented to avoid light spill on to retained habitats which hedgehogs could use. • Any chemicals or pollutants used or created by the development should be stored and disposed of correctly according to COSHH regulations. • If any hedgehogs are found in the working area these should be allowed to disperse of their own accord or, if at immediate risk, should be moved by hand to a sheltered, vegetated area away from disturbance.	provide additional opportunities for hedgehogs on site: • Native tree, hedgerow and shrub planting. • Creation of wildflower grassland. • Creation of a new pond.
Riparian Mammals	There are no watercourses adjacent to the site and no suitable habitat for otters or water vole.	No impacts are anticipated on otters or water voles as a result of the proposed development.	None.	None.
Birds	No evidence of nesting birds was observed internally or externally on any of the	Two trees will be removed during construction. The loss of such habitats is likely to be inconsequential to local bird	Works (tree removal) should be undertaken outside the period 1st March to 31st August. If this timeframe cannot be avoided, a close inspection of the tree	The installation of two bird boxes at the site will provide additional nesting habitat for birds.

	survey buildings. A bird's nest was observed within the pear tree on the western boundary. However, this tree will not be removed as part of the proposed plans.	populations owing to their low value and the presence of more extensive habitat locally. However, the proposed development could result in the destruction or the disturbance and subsequent abandonment of active bird nests.	should be undertaken immediately, by qualified ecologist, prior to the commencement of work. All active nests will need to be retained until the young have fledged.	The bird boxes will be installed on scattered trees onsite. General purpose bird boxes should be positioned 3m above ground level where they will be sheltered from prevailing wind, rain and strong sunlight. Species-specific bird boxes should be installed in line with manufacturers specifications.
Invertebrates	The site is suitable to common invertebrates.	No impacts are anticipated on notable species or populations of invertebrates as a result of the proposed development.	None.	None.

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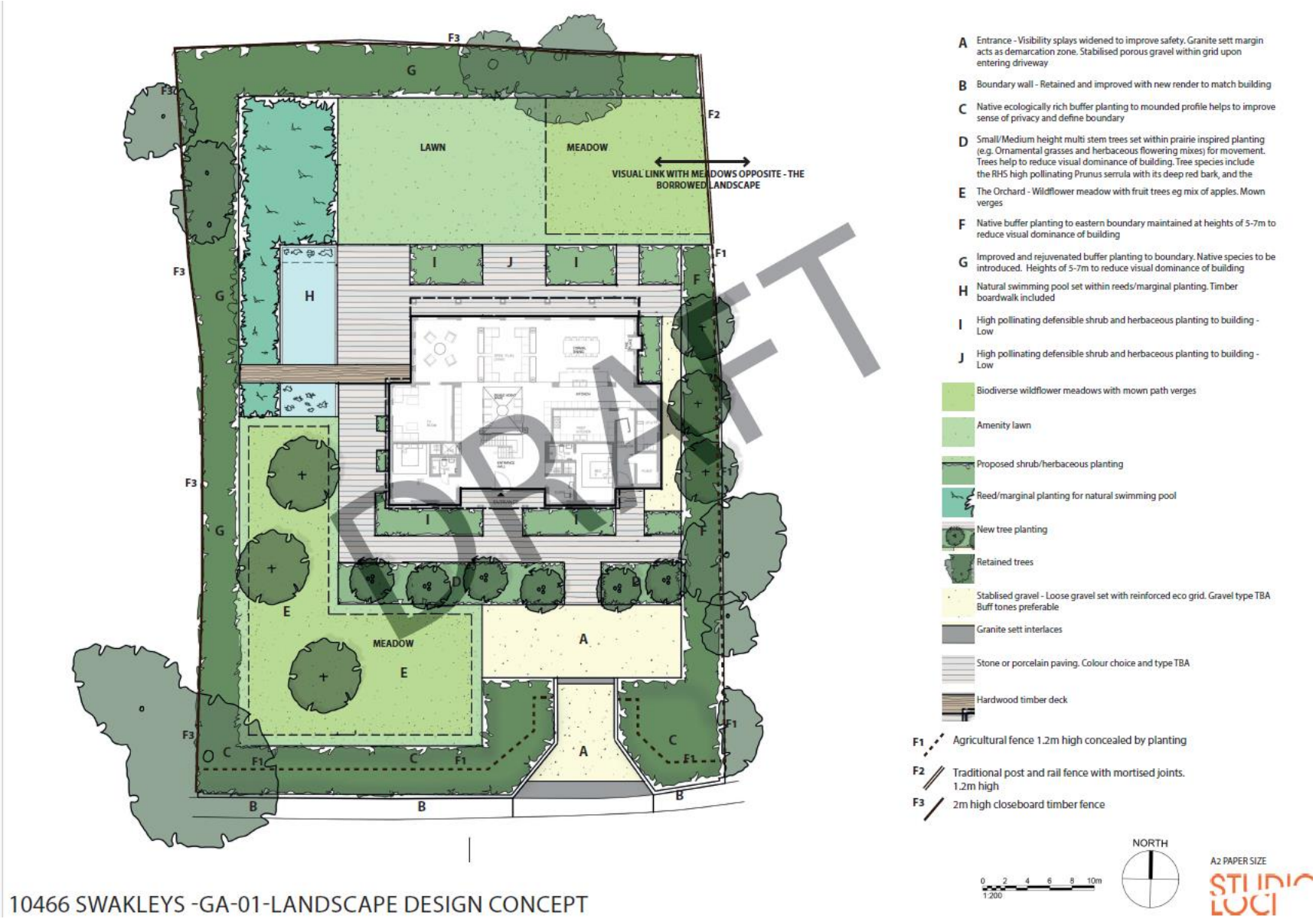
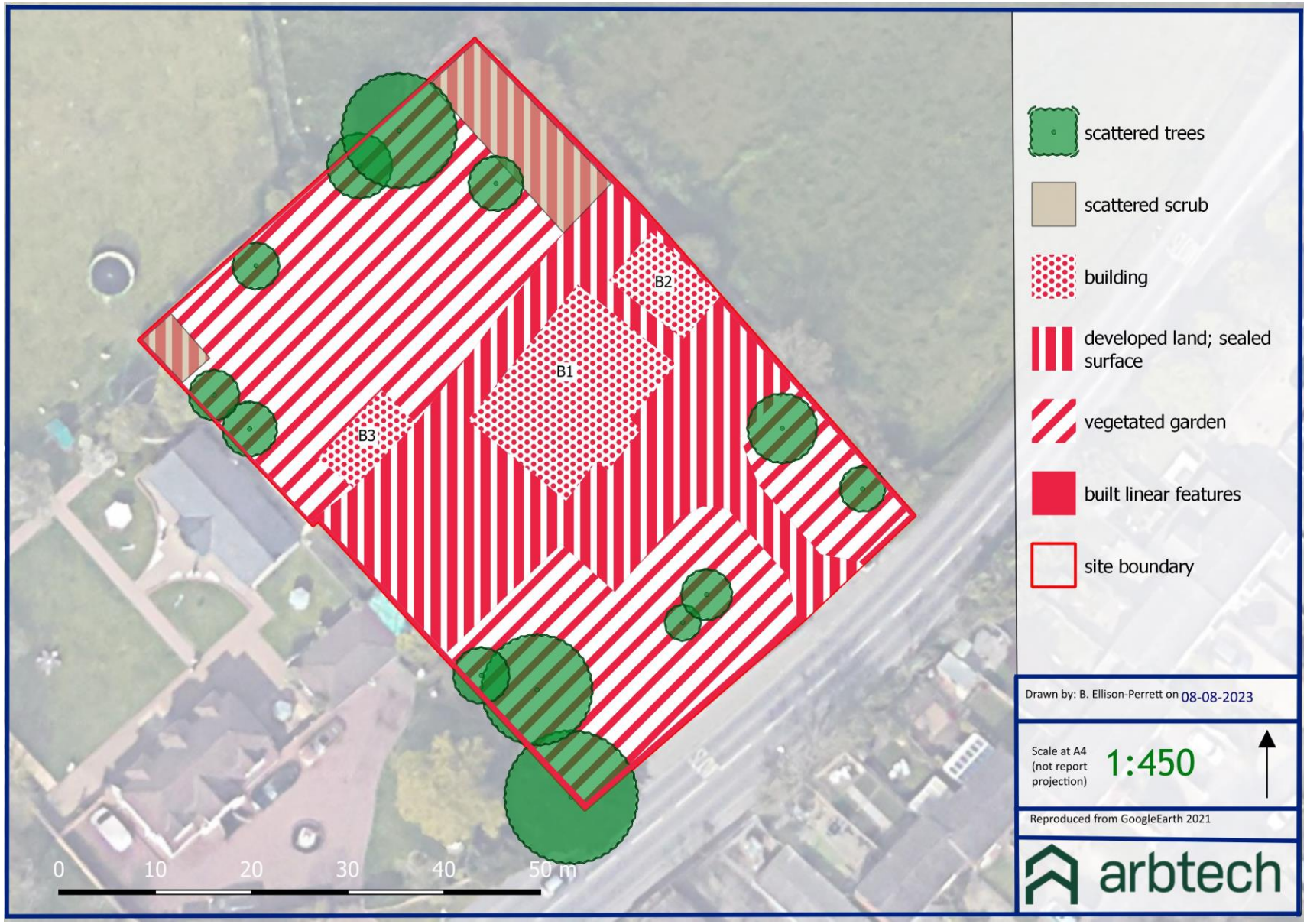
Appendix 1: Proposed Development Plan

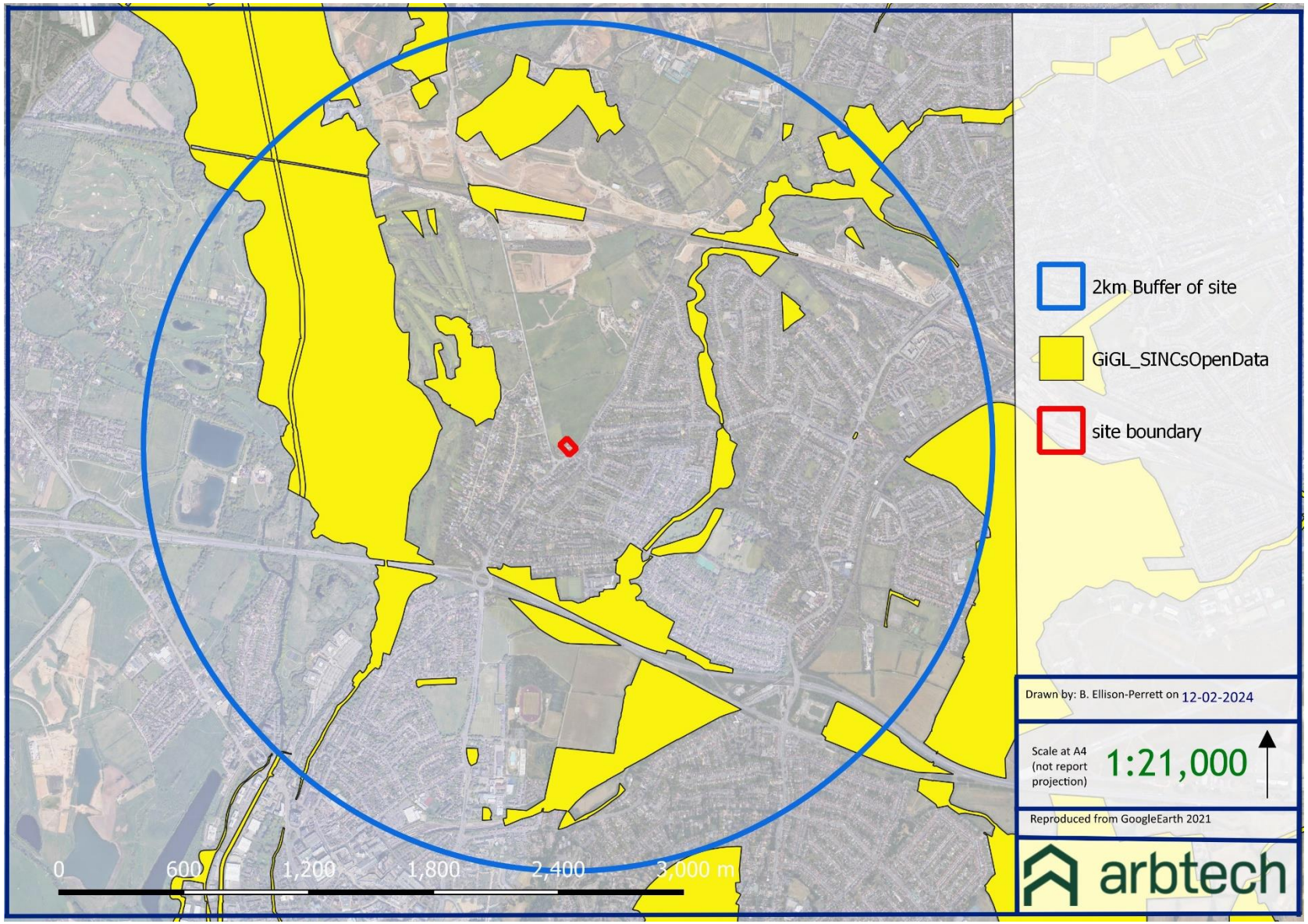


Appendix 2: Site Location Plan

Appendix 3: Habitat Survey Plan



Appendix 4: Location of Designated SINC sites within 2km of the Site



Appendix 5: Legislation and Planning Policy

LEGAL PROTECTION

National and European Legislation Afforded to Habitats

International Statutory Designations

Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) are sites of European importance and are designated under the EC Habitats Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora (the Habitats Directive) and the EC Birds Directive 2009/147/EC on the conservation of wild birds (the Wild Birds Directive) respectively. Both form part of the wider Natura 2000 network across Europe.

Under the Habitats Directive Article 3 requires the establishment of a network of important conservation sites (SACs) across Europe. Over 1000 animal and plant species, as well as 200 habitat types, listed in the directive's annexes are protected in various ways:

Annex II species (about 900): core areas of their habitat are designated as Sites of Community importance (SCIs) and included in the Natura 2000 network. These sites must be managed in accordance with the ecological needs of the species.

Annex IV species (over 400, including many Annex II species): a strict protection regime must be applied across their entire natural range, both within and outside Natura 2000 sites.

Annex V species (over 90): their exploitation and taking in the wild is compatible with maintaining them in a favourable conservation status.

SPAs are classified under Article 2 of the Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds both for rare bird species (as listed on Annex I) and for important migratory species.

The Conservation of Habitats and Species Regulations 2017 (as amended) form the legal basis for the implementation of the Habitats and Birds Directives in terrestrial areas and territorial waters out to 12 nautical miles in England and Wales (including the inshore marine area) and to a limited extent in Scotland and Northern Ireland.

Ramsar sites are designated under the Convention on Wetlands of International Importance, agreed in Ramsar, Iran, in 1971. The Convention covers all aspects of wetland conservation and recognises the importance of wetland ecosystems in relation to global biodiversity conservation. The Convention refers to wetlands as "*areas of marsh, fen, peatland or water, whether natural or artificial, permanent or temporary, with water that is static or flowing, fresh, brackish or salt, including areas of marine water the depth of which at low tide does not exceed six metres*". However, they may also include riparian and coastal zones. Ramsar sites are statutorily protected under the Wildlife & Countryside Act 1981 (as amended 01.04.1996) with further protection provided by the Countryside and Rights of Way (CRoW) Act 2000. Policy statements have been issued by the Government in England and Wales highlighting the special status of Ramsar sites. The Government in England and Wales has issued policy statements which ensure that Ramsar sites are afforded the same protection as areas designated under the EC Birds and Habitats Directives as part of the Natura 2000 network (e.g. SACs & SPAs). Further provisions for the protection and management of SSSIs have been introduced by the Nature Conservation (Scotland) Act 2004.

National Statutory Designations

Sites of Special Scientific Interest (SSSI) are designated by nature conservation agencies in order to conserve key flora, fauna, geological or physio-geographical features within the UK. The original designations were under the National Parks and Access to the Countryside Act 1949 but SSSIs were then re-designated under the Wildlife & Countryside Act 1981 (as amended). As well as reinforcing other national designations (including National Nature Reserves), the system also provides statutory protection for terrestrial and coastal sites which are important within the European Natura 2000 network and globally.

Local Statutory Designations

Local authorities in consultation with the relevant nature conservation agency can declare Local Nature Reserves (LNRs) under the National Parks and Access to the Countryside Act 1949. LNRs are designated for flora, fauna or geological interest and are managed locally to retain these features and provide research, education and recreational opportunities.

Non- Statutory Designations

All non-statutorily designated sites are referred to as Local Wildlife Sites (LWS) and can be designated by the local authority for supporting local conservation interest. Combined with statutory designation, these sites are considered within Local Development Frameworks under the Town and Country Planning system and are a material consideration during the determination of planning applications. The protection afforded to these sites varies depending on the local authority involved.

Regionally Important Geological Sites (RIGs) are the most important geological and geomorphological areas outside of statutory designations. These sites are also a material consideration during the determination of planning applications.

The Hedgerow Regulations 1997

The Hedgerow Regulations 1997 are designed to protect 'important' countryside hedgerows. Importance is defined by whether the hedgerow (a) has existed for 30 years or more; or (b) satisfies at least one of the criteria listed in Part II of Schedule 1 of the Regulations.

Under the Regulations, it is against the law to remove or destroy hedgerows on or adjacent to common land, village greens, SSSIs (including all terrestrial SACs, NNRs and SPAs), LNRs, land used for agriculture or forestry and land used for the keeping or breeding of horses, ponies or donkeys without the permission of the local authority. Hedgerows 'within or marking the boundary of the curtilage of a dwelling-house' are excluded.

National and European Legislation Afforded to Species

The Conservation of Habitats and Species Regulations 2017 (as amended)

The Conservation of Habitats and Species Regulations 2017 (as amended) aims to promote the maintenance of biodiversity by requiring the Secretary of State to take measures to maintain or restore wild species listed within the Regulations at a favourable conservation status.

The Regulations make it an offence (subject to exceptions) to deliberately capture, kill, disturb, or trade in the animals listed in Schedule 2, or pick, collect, cut, uproot, destroy, or trade in the plants listed in Schedule 4. However, these actions can be made lawful through the granting of licenses by the appropriate authorities. Licenses may be granted for a number of purposes (such as science and education, conservation, preserving public health and safety), but only after the appropriate authority is satisfied that there are no satisfactory alternatives and that such actions will have no detrimental effect on wild population of the species concerned.

The Wildlife and Countryside Act (WCA) 1981 (as amended)

The Wildlife and Countryside Act (WCA) 1981 (as amended) implements the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention 1979, implemented 1982) and implements the species protection requirements of EC Birds Directive 2009/147/EC on the conservation of wild birds in Great Britain (the birds Directive). The WCA 1981 has been subject to a number of amendments, the most important of which are through the Countryside and Rights of Way (CRoW) Act (2000).

Other legislative Acts affording protection to wildlife and their habitats include:

- Deer Act 1991
- Natural Environment & Rural Communities (NERC) Act 2006
- Protection of Badgers Act 1992
- Wild Mammals (Protection) Act 1996

Badgers

Badgers *Meles meles* are protected under The Protection of Badgers Act 1992 which makes it an offence to:

- Wilfully kill, injure, take, or attempt to kill, injure or take a badger
- Cruelly ill-treat a badger, including use of tongs and digging
- Possess or control a dead badger or any part thereof
- Intentionally or recklessly damage, destroy or obstruct access to a badger sett or any part thereof
- Intentionally or recklessly disturb a badger when it is occupying a badger sett
- Intentionally or recklessly cause a dog to enter a badger sett
- Sell or offers for sale, possesses or has under his control, a live badger

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

A development licence will be required from the relevant countryside agency (i.e. Natural England) for any development works likely to affect an active badger sett, or to disturb badgers whilst they occupy a sett. Guidance has been issued by the countryside agencies to define what would constitute a licensable activity. It is no possible to obtain a licence to translocate badgers.

Birds

With certain exceptions, all birds, their nests and eggs are protected under Sections 1-8 of the WCA. Among other things, this makes it an offence to:

- Intentionally kill, injure or take any wild bird
- Intentionally take, damage or destroy the nest of any wild bird while it is in use or being built
- Intentionally take or destroy an egg of any wild bird
- Sell, offer or expose for sale, have in his possession or transport for the purpose of sale any wild bird (dead or alive) or bird egg or part thereof.

Certain species of bird, for example the barn owl, bittern and kingfisher receive additional protection under Schedule 1 of the WCA and are commonly referred to as "Schedule 1" birds. This affords them protection against:

- Intentional or reckless disturbance while it is building a nest or is in, on or near a nest containing eggs or young
- Intentional or reckless disturbance of dependent young of such a bird

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

Works should be planned to avoid the possibility of killing or injuring any wild bird or damaging or destroying their nests. The most effective way to reduce the likelihood of nest destruction in particular is to undertake work outside the main bird nesting season which typically runs from March to August. Where this is not feasible, it will be necessary to have any areas of suitable habitat thoroughly checked for nests prior to vegetation clearance.

Schedule 1 birds are additionally protected against disturbance during the nesting season. Thus, it will be necessary to ensure that no potentially disturbing works are undertaken in the vicinity of the nest. The most effective way to avoid disturbance is to postpone works until the young have fledged. If this is not feasible, it may be possible to maintain an appropriate buffer zone or standoff around the nest.

Amphibians and Reptiles

The sand lizard *Lacerta agilis*, smooth snake *Coronella austriaca*, natterjack toad *Epidalea calamita*, pool frog *Pelophylax lessonae* and great crested newt *Triturus cristatus* receive full protection under Habitats Regulations through their inclusion on Schedule 2. Regulation 41 prohibits:

- Deliberate killing, injuring or capturing of Schedule 2 species

- Deliberate disturbance of species in such a way as:
- To impair their ability to survive, breed, or reproduce, or to rear or nurture young;
- To impair their ability to hibernate or migrate
- To affect significantly the local distribution or abundance of the species
- Damage or destruction of a breeding site or resting place

With the exception of the pool frog, these species are also listed on Schedule 5 of the WCA and they are additionally protected from:

- Intentional or reckless disturbance (at any level)
- Intentional or reckless obstruction of access to any place of shelter or protection
- Selling, offering or exposing for sale, possession or transporting for purpose of sale.

Other native species of reptiles are protected solely under Schedule 5, Section 9(1) & (5) of the WCA, i.e. the adder *Vipera berus*, grass snake *Natrix natrix*, common lizard *Zootoca vivipara* and slow-worm *Anguis fragilis*. It is prohibited to:

- Intentionally or recklessly kill or injure these species.

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

A European Protected Species Licence (EPSL) issued by the relevant countryside agency (i.e. Natural England) will be required for works likely to affect the breeding sites or resting places amphibian and reptile species protected under Habitats Regulations. A licence will also be required for operations liable to result in a level of disturbance which might impair their ability to undertake those activities mentioned above (e.g. survive, breed, rear young and hibernate). The licences are to allow derogation from the relevant legislation, but also to enable appropriate mitigation measures to be put in place and their efficacy to be monitored.

Although not licensable, appropriate mitigation measures may also be required to prevent the intentional killing or injury of adder, grass snake, common lizard and slow worm, thus avoiding contravention of the WCA.

Water Voles

The water vole *Arvicola terrestris* is fully protected under Schedule 5 of the WCA. This makes it an offence to:

- Intentionally kill, injure or take (capture) water voles
- Intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection
- Intentionally or recklessly disturb water voles while they are occupying a structure or place used for shelter or protection

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

If development works are likely to affect habitats known to support water voles, the relevant countryside agency (i.e. Natural England) must be consulted. It must be shown that means by which the proposal can be re-designed to avoid contravening the legislation have been fully explored e.g. the use of alternative sites, appropriate timing of works to avoid times of the year in which water voles are most vulnerable, and measures to ensure minimal habitat loss. Conservation licences for the capture and translocation of water voles may be issued by the relevant countryside agency for the purpose of development activities if it can be shown that the activity has been properly planned and executed and thereby contributes to the conservation of the population. The licence will then only be granted to a suitably experienced person if it can be shown that adequate surveys have been undertaken to inform appropriate mitigation measures. Identification and preparation of a suitable receptor site will be necessary prior to the commencement of works.

Otters

Otters *Lutra lutra* are fully protected under the Conservation Regulations through their inclusion on Schedule 2. Regulation 41 prohibits:

- Deliberate killing, injuring or capturing of Schedule 2 species
- Deliberate disturbance of species in such a way as:
- To impair their ability to survive, breed, or reproduce, or to rear or nurture young;
- To impair their ability to hibernate or migrate
- To affect significantly the local distribution or abundance of the species
- Damage or destruction of a breeding site or resting place

Otters are also currently protected under the WCA through their inclusion on Schedule 5. Under this Act, they are additionally protected from:

- Intentional or reckless disturbance (at any level)
- Intentional or reckless obstruction of access to any place of shelter or protection

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

A European Protected Species Licence (EPSL) issued by the relevant countryside agency (i.e. Natural England) will be required for works likely to affect otter breeding or resting places (often referred to as holts, couches or dens) or for operations likely to result in a level of disturbance which might impair their ability to undertake those activities mentioned above (e.g. survive, breed, and rear young). The licence is to allow derogation from the relevant legislation but also to enable appropriate mitigation measures to be put in place and their efficacy to be monitored

Bats

All species are fully protected by Habitats Regulations 2010 as they are listed on Schedule 2. Regulation 41 prohibits:

- Deliberate killing, injuring or capturing of Schedule 2 species (e.g. All bats)
- Deliberate disturbance of bat species in such a way as:
- To impair their ability to survive, breed, or reproduce, or to rear or nurture young;
- To impair their ability to hibernate or migrate
- To affect significantly the local distribution or abundance of the species
- Damage or destruction of a breeding site or resting place

Bats are afforded the following additional protection through the WCA as they are included on Schedule 5:

- Intentional or reckless disturbance (at any level)
- Intentional or reckless obstruction of access to any place of shelter or protection

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

A European Protected Species Licence (EPSL) issued by the relevant countryside agency (i.e. Natural England) will be required for works are likely to affect a bat roost or an operation which are likely to result in an illegal level of disturbance to the species will require an EPSL. The licence is to allow derogation from the legislation through the application of appropriate mitigation measures and monitoring.

Hazel Dormice

Hazel dormice *Muscardinus avellanarius* are fully protected under Habitats Regulations through their inclusion on Schedule 2. Regulation 41 prohibits:

- Deliberate killing, injuring or capturing of Schedule 2 species
- Deliberate disturbance of species in such a way as:
- To impair their ability to survive, breed, or reproduce, or to rear or nurture young;
- To impair their ability to hibernate or migrate
- To affect significantly the local distribution or abundance of the species
- Damage or destruction of a breeding site or resting place

Dormice are also protected under the WCA through their inclusion on Schedule 5. Under this Act, they are additionally protected from:

- Intentional or reckless disturbance (at any level)

- Intentional or reckless obstruction of access to any place of shelter or protection

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

Works which are liable to affect a dormice habitat or an operation which are likely to result in an illegal level of disturbance to the species will require a European Protected Species Licence (EPSL) issued by the relevant countryside agency (i.e. Natural England). The licence is to allow derogation from the legislation through the application of appropriate mitigation measures and monitoring.

White Clawed Crayfish

There is a considerable amount of legislation in place in an attempt to protect the White-clawed crayfish *Austropotamobius pallipes*. This species is listed under the European Union's (EU) Habitat and Species Directive and is listed under Schedule 5 of the Wildlife and Countryside Act (1981). This makes it an offence to:

- Protected against intentional or reckless taking
- Protected against selling, offering or advertising for sale, possessing or transporting for the purpose of sale

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

The relevant countryside agency (i.e. Natural England) will need to be consulted about development which could impact on a watercourse or wetland known to support white clawed crayfish. Conservation licences for the capture and translocation of crayfish can be issued if it can be shown that the activity has been properly planned and executed and thereby contributes to the conservation of the population. The licence will only be granted to a suitably experienced person if it can be shown that adequate surveys have been undertaken to inform appropriate mitigation measures. Identification and preparation of a suitable receptor site will be necessary prior to the commencement of the works.

Wild Mammals (Protection Act) 1996

All wild mammals are protected against intentional acts of cruelty under the above legislation. This makes it an offence to mutilate, kick, beat, nail or otherwise impale, stab, burn, stone, crush, drown, drag or asphyxiate any wild mammal with intent to inflict unnecessary suffering.

To avoid possible contravention, due care and attention should be taken when carrying out works (for example operations near burrows or nests) with the potential to affect any wild mammal in this way, regardless of whether they are legally protected through other conservation legislation or not.

Legislation Afforded to Plants

With certain exceptions, all wild plants are protected under the WCA. This makes it an offence for an 'unauthorised' person to intentionally (or recklessly in Scotland) uproot wild plants. An authorised person can be the owner of the land on which the action is taken, or anybody authorised by them.

Certain rare species of plant, for example some species of orchid, are also fully protected under Schedule 8 of the Wildlife and Countryside Act 1981 (as amended). This prohibits any person from:

- Intentionally picking, uprooting or destruction of any wild Schedule 8 species
- Selling, offering or exposing for sale, or possessing or transporting for the purpose of sale, any wild live or dead Schedule 8 plant species or part thereof
- In addition to the UK legislation outlined above, several plant species are fully protected under Schedule 5 of The Conservation of Habitats and Species Regulations 2010. These are species of European importance. Regulation 45 makes it an offence to:
- Deliberately pick, collect, cut, uproot or destroy a wild Schedule 5 species
- Be in possession of, or control, transport, sell or exchange, or offer for sale or exchange any wild live or dead Schedule 5 species or anything derived from such a plant.

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

A European Protected Species Licence (EPSL) will be required from the relevant countryside agency (i.e. Natural England) for works which are likely to affect species of planted listed on Schedule 5 of the Conservation or Habitats and Species Regulations 2010. The licence is to allow derogation from the legislation through the application of appropriate mitigation measures and monitoring.

Invasive Species

Part II of Schedule 9 of the WCA lists non-native invasive plant species for which it is a criminal offence in England to plant or cause to grow in the wild due to their impact on native wildlife. Species included (but not limited to):

- Japanese knotweed *Fallopia japonica*
- Giant hogweed *Heracleum mantegazzianum*
- Himalayan balsam *Impatiens glandulifera*

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

It is not an offence for plants listed in Part II of Schedule 9 of the WCA 1981 to be present on the development site, however, it is an offence to cause them to spread. Therefore, if any of the species are present on site and construction activities may result in further spread (e.g. earthworks, vehicle movements) then it will be necessary to design and implement appropriate mitigation prior to construction commencing.

Injurious weeds

Under the Weeds Act 1959 any landowner or occupier may be required prevent the spread of certain 'injurious weeds' including (but not limited to):

- Spear thistle *Cirsium vulgare*
- Creeping thistle *Cirsium arvense*
- Curled dock *Rumex crispus*
- Broad-leaved dock *Rumex obtusifolius*
- Common ragwort *Senecio jacobaea*

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

It is a criminal offence to fail to comply with a notice requiring such action to be taken. The Ragwort Control Act 2003 establishes a ragwort control code of practice as common ragwort is poisonous to horses and other livestock. This code provides best practice guidelines and is not legally binding.

NATIONAL PLANNING POLICY

Environment Act 2021

The Environment Act 2021 (EA 2021) received Royal Assent on 9 November 2021 and is expected to become fully mandated within the next couple of years. The Act principally creates a post Brexit framework to protect and enhance the natural environment. Through amendments to the Town and Country Planning Act 1990, the Act will require all planning permissions in England (subject to exemptions which is likely to include householder applications) to be granted subject to a new general pre-commencement condition that requires approval of a biodiversity net gain plan. This will ensure the delivery of a minimum of 10% measurable biodiversity net gain. The principal tool to calculate this will be the Defra Biodiversity 3.0 Metric. Works to enhance habitats can be carried out either onsite or offsite or through the purchase of 'biodiversity credits' from the Secretary of State. However, this flexibility may be removed (subject to regulations) if the onsite habitat is 'irreplaceable'. Both onsite and offsite enhancements must be maintained for at least 30 years after completion of a development (which period may be amended).

National Planning Policy Framework 2021

The National Planning Policy Framework promotes sustainable development. The Framework specifies the need for protection of designated sites and priority habitats and species. An emphasis is also made on the need for ecological infrastructure through protection, restoration and re-creation. The protection and recovery of priority species (considered likely to be those listed as species of principal importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006) is also listed as a requirement of planning policy.

In determining a planning application, planning authorities should aim to conserve and enhance biodiversity by ensuring that: designated sites are protected from harm; there is appropriate mitigation or compensation where significant harm cannot be avoided; measurable gains in biodiversity in and around developments are incorporated; and planning permission is refused for development resulting in the loss or deterioration of irreplaceable habitats including aged or veteran trees and also ancient woodland.

The Natural Environment and Rural Communities Act 2006 and the Biodiversity Duty

Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006, requires all public bodies to have regard to biodiversity conservation when carrying out their functions. This is commonly referred to as the 'biodiversity duty'.

Section 41 of the Act requires the Secretary of State to publish a list of habitats and species which are of 'principal importance for the conservation of biodiversity'. This list is intended to assist decision makers such as public bodies in implementing their duty under Section 40 of the Act. Under the Act these habitats and species are regarded as a material consideration in determining planning applications. A developer must show that their protection has been adequately addressed within a development proposal.

EUROPEAN PROTECTED SPECIES POLICIES

In December 2016 Natural England officially introduced the four licensing policies throughout England. The four policies seek to achieve better outcomes for European Protected Species (EPS) and reduce unnecessary costs, delays and uncertainty that can be inherent in the current standard EPS licensing system. The policies are summarised as follows:

- Policy 1; provides greater flexibility in exclusion and relocation activities, where there is investment in habitat provision;
- Policy 2; provides greater flexibility in the location of compensatory habitat;
- Policy 3; provides greater flexibility on exclusion measures where this will allow EPS to use temporary habitat; and,
- Policy 4; provides a reduced survey effort in circumstances where the impacts of development can be confidently predicted.

The four policies have been designed to have a net benefit for EPS by improving populations overall and not just protecting individuals within development sites. Most notably Natural England now recognises that the Habitats Regulations legal framework now applies to 'local populations' of EPS and not individuals/site populations.