



# **Preliminary Ecological Appraisal Report**

Land at New Mill

New Mill Lane

Eversley

RG27 0RA

**June 2026**

Wild Earth Ecology

07930216662 | Fishers Cottage, Stockbridge, Hampshire, SO20 6BP

[laura@wildearthecology.uk](mailto:laura@wildearthecology.uk)

## Project Details

|                            |                                                                |
|----------------------------|----------------------------------------------------------------|
| <b>Client:</b>             | Mrs Kate Mahoney                                               |
| <b>Site/Job:</b>           | Land at New Mill, New Mill Lane, Eversley, Hampshire, RG27 0RA |
| <b>Report Title:</b>       | Preliminary Ecological Appraisal                               |
| <b>Report Reference:</b>   | Newmill-26-223                                                 |
| <b>Report author:</b>      | Laura Kahane and Matilda Taragel                               |
| <b>Grid Reference:</b>     | SU 76309 62786                                                 |
| <b>Survey date(s):</b>     | 19/05/2026                                                     |
| <b>Surveyed by:</b>        | Laura Kahane and Matilda Taragel                               |
| <b>Architect/Agent:</b>    | Masker Architects                                              |
| <b>Planning reference:</b> |                                                                |

## Quality Control

| Version | Status   | Date       | Author(s)                       | Signature                                                                             | Reviewed/<br>Approved<br>by | Signature  |
|---------|----------|------------|---------------------------------|---------------------------------------------------------------------------------------|-----------------------------|------------|
| 1       | Complete | 12/06/2026 | Laura Kahane<br>Matilda Taragel |  | Kari<br>Bettoney            | K.BETTONEY |

This report remains valid for 12 months from date of issue.

Survey data are valid for 12-24 months from the date the survey was undertaken.

If during the planning process; the proposals change which results in an impact on a habitats which has not been mitigated for within this report or; the boundary line changes or; the habitat change significantly, a re-assessment in relation to ecology is likely to be required.

### Disclaimer:

This report has been produced by Wild Earth Ecology in accordance with the Chartered Institute of Ecology and Management (CIEEM) Guidelines for Ecological Report Writing 2017<sup>1</sup> and CIEEM's Code of Professional Conduct. All opinions expressed represent our true and professional bona fide opinions.

This report has been prepared by Wild Earth Ecology for Mr Parker ('the client') for use solely as an Ecological Appraisal Report. Wild Earth Ecology accepts no responsibility or liability for any use that is made of this document other than by the client for the purposes for which it was originally commissioned and prepared.

This is a technical report which does not represent legal advice. You may wish to seek legal advice if this is required. This report is not intended to be submitted with a planning application for a development without supporting documents, including results of further surveys and detailed assessments of the effects of the proposed development.

It is the duty of care of the landowner/developer to act responsibly and comply with current environmental legislation if protected species are suspected or found prior to works.

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<sup>1</sup> CIEEM (2017) *Guidelines on Ecological Report Writing*. Chartered Institute of Ecology and Environmental Management, Winchester.

## Executive Summary

|               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|---------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Purpose       | <ul style="list-style-type: none"> <li>Laura Kahane was commissioned by Mrs Kate Mahoney to undertake a Preliminary Ecological Appraisal (PEA) to support a planning application for the erection of a temporary marquee (6 months maximum annually) on land at New Mill, New Mill Lane, Eversley, Hampshire, RG27 0RA, centred at grid reference SU 76309 62786 (hereafter referred to as the 'site').</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| Methodologies | <ul style="list-style-type: none"> <li>A field survey, in the form of an extended Phase 1 Habitat Survey, was undertaken. Habitats within the site were identified and mapped in compliance with the 'Handbook for Phase 1 habitat survey: A Technique for Environmental Audit' (Joint Nature Conservation Committee, 2010).</li> <li>An assessment was also undertaken of the likely presence or absence of protected and notable animal species within the zone of influence of the proposed development. This has been carried</li> <li>During the survey work undertaken, areas of modified grassland were identified within the site. Within the zone of influence, to 5m of the red line boundary, and adjacent, areas of riparian vegetation comprising primarily tall ruderal/ephemeral margin the river Long which were also assessed. No evidence of protected species was found. A full walkover of the site falling within the blue line boundary comprising the amenity garden, mill house and mill features was carried out at the time of the survey.</li> <li>The nearby hedgerows, amenity planting and mature trees were considered to have suitability to support nesting birds, and other species that occur locally, such as commuting bats, nesting birds, and European hedgehog (<i>Erinaceus europaeus</i>); however, these habitats are not due to be impacted by the proposals directly or indirectly. The modified grassland was also considered to provide commuting and foraging habitat for small mammals and some nesting birds.</li> <li>Based on the area of the site to be impacted and the location of the nearest water bodies to the site (which could be assessed using a Habitat Suitability Index (HSI), results show that the pond (P2) located 80m to the east presents 'below average suitability to support Great Crested Newt'. The site is also located within a red area for GCN, on the NatureSpace Partnership GCN impact risk zone map. Therefore, whilst no further surveys for this species are considered necessary, Recommended Avoidance Measures have been recommended to protect amphibians throughout the site preparation and construction phase (erection and dismantling phase).</li> <li>A web-based desk study was undertaken for designated sites and protected species and habitat records within 2 km of the site.</li> </ul> |
| Key Issues    | <p><b>Root Protection Zone</b></p> <p>All off-site trees that fall on the boundary of the site should be protected throughout the development in accordance with British Standards BS 5837:2012. Root protection areas should be 12x the diameter at breast height (DBH) or the reach of the longest branch (whichever is greater), unless otherwise advised by a qualified arboriculturist. The semi-mature to mature trees within the hedgerow and access track to the west of the site likely have roots within the zone of influence. No materials should be allowed to be stored within these root protection areas, and no heavy machinery should run over them.</p> <p><b>Nesting birds</b></p> <p>In order to protect bird nests and comply with the law protecting them, whilst no vegetation removal is proposed as necessary, it should be considered in case of vegetation encroachment. Therefore, any vegetation removal should take place outside of the breeding bird season, which is generally considered to be from March to September inclusive. If this is not possible, prior to removal, such</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

vegetation should first be checked for the presence of nesting birds by an experienced ecologist. If any nests are found, they will be left undisturbed until the chicks have fledged.

**Reptiles, amphibians, and hedgehogs (Recommended Avoidance Measures)**

It is anticipated that the impacts on incidences of amphibians, transitory reptiles, and small mammals such as hedgehogs can be avoided by adopting reasonable avoidance measures (RAMs), which should include;

- General good practice measures during the construction phase (erection and dismantling of the marquee), including storage of materials.
- All marquee materials should be raised off the ground (on pallets or skids) if stacked near to the site on dismantling. This will provide an opportunity for refuge until completed.
- No vegetation is proposed for removal, however if vegetation should encroach up and around the marquee edges, a staged Vegetation Clearance would be required - using hand-held tools (such as strimmers and brush cutters) to minimise the risk to any reptiles, amphibians or hedgehogs that are incidentally found. This includes any clearance of vegetation, such as grassland or tall ruderal vegetation found on or along the periphery of the site.

**Schedule 9 plant species**

No schedule 9 species were observed on site; however, Himalayan balsam (*Impatiens glandulifera*) was observed to be along the riparian edge to the south and east of the site. Care should be taken in preventing the spread of this species if any vegetation should be disturbed.

**Ecological Enhancement**

Enhancements will be easy to integrate into the design of the development and suitable recommendations which will aim to meet the NPPF / local planning policies which include the erection of one bat box, one tawny owl box and a log pile. This project is <0.25m2 of green habitat due to be permanently impacted and therefore meets the exemption criteria from Biodiversity Net Gain. A full exemption justification has been provided within the application.

## **Contents**

|                                                                 |    |
|-----------------------------------------------------------------|----|
| Project Details .....                                           | 2  |
| Quality Control.....                                            | 2  |
| Executive Summary.....                                          | 3  |
| Contents.....                                                   | 5  |
| 1.0. Introduction & Background .....                            | 6  |
| Overview & Proposed Development .. .....                        | 6  |
| Site Description.....                                           | 6  |
| 2.0. Methodology.....                                           | 7  |
| Desk Study. ....                                                | 7  |
| Field Survey .....                                              | 8  |
| Ecological Appraisal.....                                       | 8  |
| Species Groups.....                                             | 8  |
| Limitations and Assumptions .....                               | 10 |
| 3.0. Results.....                                               | 10 |
| Desk Study .....                                                | 10 |
| Designated Sites (Statutory) .....                              | 10 |
| Designated Sites (Non-statutory).....                           | 11 |
| Field Survey.....                                               | 10 |
| Timing and Conditions.....                                      | 11 |
| Habitat Groups.....                                             | 12 |
| Habitat Map.....                                                | 13 |
| Protected Species Groups.....                                   | 14 |
| Impact on Proposed Development.....                             | 23 |
| 4.0. Enhancement .....                                          | 23 |
| Bat & Bird Boxes.....                                           | 24 |
| Deadwood Habitat Pile.....                                      | 25 |
| 5.0. References.....                                            | 26 |
| 6.0. Appendix   Appendix 1: Protected Species Legislation. .... | 27 |
| Appendix 2: Planning Policy and Legislation .....               | 30 |
| Appendix 3: Ecological Enhancement Recommendation Site Map..... | 33 |
| Appendix 4. Photographs of the habitats on site.....            | 34 |

## 1.0 Introduction & Background

### Overview & Proposed Development

- 1.1. Laura Kahane was commissioned by Mrs Kate Mahoney (on behalf of their client) to undertake a Preliminary Ecological Appraisal (PEA) to support a planning application for the erection of a temporary marquee (6 months maximum annually) on land at New Mill, New Mill Lane, Eversley, Hampshire, RG27 0RA centred at grid reference SU 76309 62786 (hereafter referred to as the 'site').

### Site Description

- 1.2. The survey and report undertaken followed the Bat Conservation Trust (2023) guidelines and the standard JNCC Phase 1 Survey Methodology, extended to assess the potential for the site to support protected species. The proposed development site is located approximately 1km northwest of Eversley and approximately 10km southeast of Reading. The proposed site comprises a small area of closely managed modified grassland, set within a larger amenity garden with adjacent boundary hedgerows, trees and the River Long. Immediately surrounding the proposed development site are further residential properties with associated gardens and an area of deciduous woodland to the east, south and west (Maps 1 & 2).



Map 1. Approximate boundary of the proposed development site (Copyright Google Satellite Hybrid, 2026).

- 1.3. The wider landscape comprises open fields with boundary hedgerows/treelines, woodland, residential properties to the south and east and a large plantation to the southwest (Map 2).



**Map 2.** The proposed development site in the context of the wider landscape (Copyright Google Satellite Hybrid, 2026).

- 1.4. The surrounding habitats, particularly the open grassland fields, arable fields, boundary hedgerows/treelines and woodland, are considered to provide suitable foraging and commuting opportunities for a number of protected species, including commuting bats, badger, nesting birds, amphibians, common reptiles, and European hedgehog.

## 2.0. Methodology

### Desk Study

#### 2.1. Table 1 – Sources of biodiversity and ecological records

| Source                                                                                                         | Information (search buffer between 2 km from site centre/boundary)                                                                                                                                                                                                             |
|----------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| National Biodiversity Atlas (NBN)                                                                              | Including a search radius of 2km from the site boundary.                                                                                                                                                                                                                       |
| Multi-Agency Geographic Information for the Countryside (MAGIC) and Joint Nature Conservation Committee (JNCC) | To obtain information on any designated sites of nature conservation interest within 2 km of the site and details of any European Protected Species licences issued within 2 km ( <a href="http://www.magic.gov.uk/MagicMap.aspx">http://www.magic.gov.uk/MagicMap.aspx</a> ). |
| Google Maps / Google Earth                                                                                     | To view aerial photographs, maps and mapnik data, to assess the ecological context of the site ( <a href="http://acme.com/planimeter/">http://acme.com/planimeter/</a> ).                                                                                                      |

*Given the scale and minimal/low impact nature of the proposals, and the assessed suitability of the site for protected or notable species, it is not anticipated that the purchase of full HBIC biological records data will add any significant weight or alter the conclusions and recommendations outlined in this report. Possible impacts on species which are directly relevant to the habitats on or adjacent to (such as amphibians and birds) have been assessed comprehensively.*

## Field Survey

- 2.2. Ecologist Laura Kahane BSc (Hons) MRes MRSB was commissioned to carry out a Preliminary Ecological Appraisal on 19<sup>th</sup> May 2026.
- 2.3. The survey included carrying out an extended phase 1 habitat survey. This consisted of a walkover assessment of the site within the red line boundary provided, using a phase 1 habitat survey methodology (JNCC, 2010, as amended by the Institute of Chartered Environmental Assessment (IEA, 1995)). This is a standard technique for classifying and mapping British habitats. All areas within the site were successfully surveyed, with the main plant species recorded and habitat types mapped. Indications of ecological value were recorded which included any presence or signs of any legally protected or rare species.
- 2.4. The survey also included a search to identify the presence of any invasive, non-native plant species, particularly those listed on Schedule 9 of the Wildlife & Countryside Act 1981 (as amended) which include Japanese Knotweed (*Reynoutria japonica*) and Himalayan Balsam (*Impatiens glandulifera*). Any existing trees on site were assessed for their potential to support roosting bats and birds.

## Preliminary Ecological Appraisal

- 2.5. The PEA survey identified the habitats present and their potential for protected species, particularly bats, birds, hedgehogs, badgers, hazel dormouse (*Muscardinus avellanarius*), amphibians, reptiles, and invertebrates following the standard guidelines set out by the Chartered Institute of Ecology and Environmental Management (CIEEM, 2018).
- 2.6. The survey focused on the land within the red line boundary of the planning application and the zone of impact.
- 2.7. The trees and other habitats to be affected within the site were assessed for their potential to support roosting and foraging bats, birds, and other protected species.

### Bats

- 2.8. Any trees to be affected by the proposed works were assessed visually for evidence of bats and assessed for features which increase the likelihood of bats roosting, such as storm damage, rot holes, ivy cover, flaying bark, and splits in the trunk. Linear habitat features, both within and connecting to the site were visually assessed for their likely use as foraging and commuting corridors.
- 2.9. Other habitats on site were visually assessed for their likely use as foraging sites.

### Amphibians

- 2.10. Any waterbodies within the site were assessed for their potential for use by amphibians and for features which increase the likelihood of use as breeding sites for great crested newts *Triturus cristatus*, such as suitable submerged vegetation, low water turbidity, absence of fish and low levels of use by waterfowl.

- 2.11. Other habitats on site were assessed for their likely use outside of the breeding season for both foraging and shelter purposes.

#### Reptiles

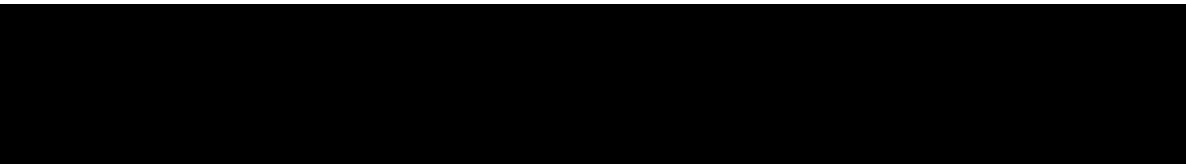
- 2.12. Open areas of habitat were visually assessed for suitability for reptiles and features which increase the likelihood of use by reptiles, including the presence of tussocky vegetation, log, and rock piles, basking spots, and compost heaps.

#### Otter

- 2.13. Habitats deemed suitable for Otter *Lutra lutra* such as rivers, streams, ditches, wetlands, reed beds, lakes, ponds, and reservoirs within close proximity of the site or other potential important habitats such as fisheries, resting places, holts including tunnels and hollows within dense, undisturbed vegetation, were assessed. Field signs of Otter were also sought including spraints, feeding remains, footprints and slides.

#### Water Vole

- 2.14. An assessment for Water vole *Arvicola amphibius* observes suitable habitats and their proximity to the site such as rivers, streams, ditches, wetlands, reed beds, lakes, ponds, and reservoirs as well as bank side vegetation and structure. Field signs including burrows, latrines, feeding remains, trails and footprints, are also recorded.



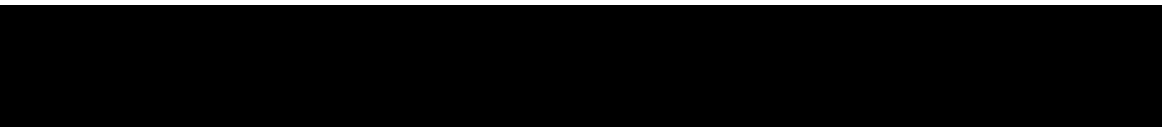
#### Birds

- 2.16. An appraisal for nesting and wintering farmland birds on site assesses the suitability of habitat and the presence of bird species including active and inactive nesting sites.

#### Invertebrates

- 2.17. During the Ecological Appraisal, features including dead wood, plant diversity and flora, spoils, woodland structure, and waterbodies on site were assessed for their suitability to support a range of invertebrates.

#### Other Mammals



- 2.19. Open areas of habitat were visually assessed for signs of mammal tracks, push throughs, and latrines.

- 2.20. Areas of woodland, copse, tree lines, hedgerows, and other boundary vegetation were assessed for their likely use by hazel dormice, or increased likelihood of use due to presence of hazel and other suitable food species.

#### Surveyor Information

2.21. Table 2 – Surveyor Information

| <b>Surveyor</b> | <b>Licences</b>                                                     | <b>Ecological Experience or qualification</b>                                                                                                                         |
|-----------------|---------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Laura Kahane    | Class licence CL18 (Bats)<br>Licence reference: 2025-86000-CL18-BAT | MRes Ecology, Evolution & Conservation<br>BSc (Hons) Wildlife, Ecology & Conservation<br>Certificate in Ecological Consultancy<br>The Royal Society of Biology (MRSB) |
| Matilda Taragel |                                                                     | MSc Global Wildlife Health and Ecology<br>BSc (Hons) Biology                                                                                                          |

#### Limitations and Assumptions

- 2.22. The desk study and field survey will not produce a comprehensive list of plants and animals as this will be limited by factors that influence their presence (e.g., activity and dormancy periods). An assessment can, however, be made of the habitats within the survey area, their nature conservation value and potential to support protected or priority species.
- 2.23. Bats can utilise buildings or trees seasonally, with frequent movement often caused by fluctuations in weather conditions. Therefore, they may arrive and begin utilising a site after it has been assessed for bats, or roost temporarily somewhere during the assessment. As a result, their cryptic nature means there is potential for them to be present during the assessment, remaining undetected, especially during the daytime when they are inactive.
- 2.24. No other limitations were encountered, or assumptions made during either the desk study or the field survey and it is considered that with the access gained and recording undertaken, an accurate assessment of the site's ecological value has been made.

### 3.0 Results

#### Desk Study

##### Designated Sites (statutory)

- 3.1. Two statutory designated sites are situated within 2km of the site boundary. Thames Basin Heaths Special Protection Area (SPA) and Bramshill Site of Special Scientific Interest (SSSI) fall in the same location approximately 200m west of the site. Bramshill SSSI is designated for its shallow acid ponds and associated mire, which support 24 species of dragonfly and damselfly. Additionally, there is a small unimproved grassland area which supports a nationally rare small fleabane (*Pulicaria vulgaris*). The conifer plantation within the same boundary area, which falls under the Thames Basin Heaths SPA, is designated for populations of nightjar

(*Caprimulgus europaeus*), woodlark (*Lullula arborea*), and Dartford warbler (*Sylvia undata*). Additionally, there are small breeding population of hobby (*Falco Subbuteo*) and little ringer plover (*Charadrius dubius*) within the plantation. The site falls within an Impact Risk Zone (IRZ) with respect to the Bramshill SSSI. The Impact Risk Zones for Sites of Special Scientific Interest (SSSI IRZs) indicate that at the location of the site, there is potential for all proposed developments to have a harmful effect on terrestrial Sites of Special Scientific Interest (SSSIs) and those Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites that they underpin. Therefore, you should consult Natural England for advice on the nature of the potential impacts and how these might be avoided or mitigated.

#### Priority Habitats and Ancient Woodland

- 3.2. An area of deciduous woodland falls adjacent to the western and southern site boundary lines. No further areas of priority habitat fall adjacent to or within the site boundary.
- 3.3. A number of priority habitats are present within the wider area, including areas of Ancient & Semi-Natural Woodland, deciduous woodland, wood-pasture and parkland, traditional orchards, chalk rivers, lowland heath, purple moor grass and rush pasture, lowland meadows, lowland dry acid grassland, coastal and floodplain grazing marsh, and good quality semi-improved grassland. The closest of these is an area of wood-pasture and parkland located approximately 150m west of the site boundary.
- 3.4. Twenty-eight areas of ancient woodland (ASW) are located in the wider area, including areas of ancient and semi-natural woodland and ancient replanted woodland. The closest of these is an area of ancient and semi-natural woodland named Poors Copse, located approximately 740m northeast of the site.

#### Impacts and Mitigation

- 3.5. Consideration should be given to priority habitats throughout the development in order to minimise the impacts. The development is only expected to impact priority sites directly and indirectly during the development process and not in the long term. Given their distance from the site, no designated sites or areas of priority habitat will be directly affected through land take of the development. However, a suitable buffer of at least 5m should be maintained between the area of any on or off-site priority, or higher value habitats, such as a woodland or the river bank, particularly on the western boundary, and any development works which might create disturbance. This 5m buffer is already in place defined by the area of closely amenity lawn around the marquee, allowing a sufficient buffer area between the marquee and more sensitive habitats such as the marginal riparian vegetation and watercourse.

## Field Survey

### Timing and Conditions

3.6. Table 3 – Summary of conditions during survey

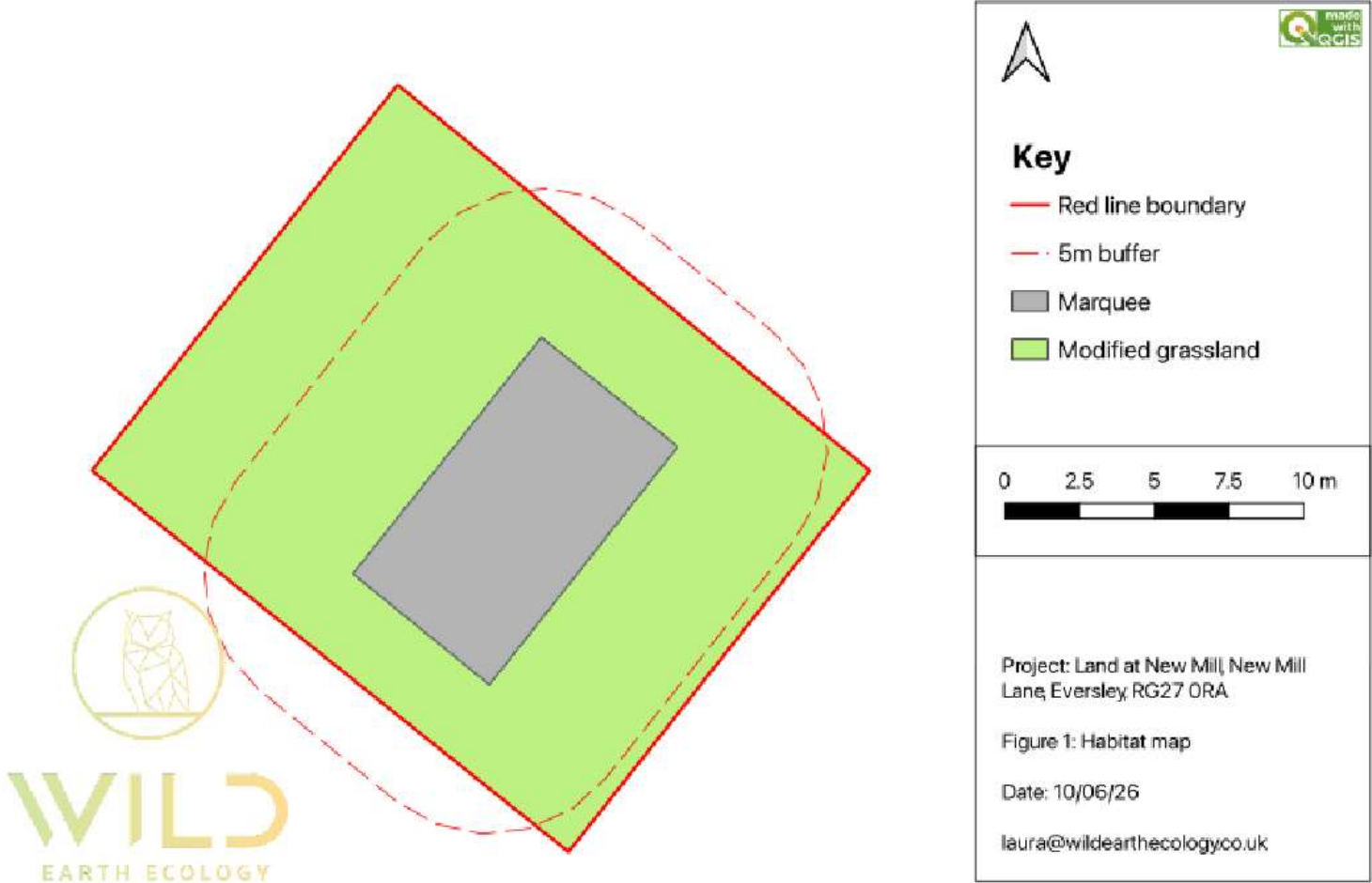
|                                            |                                  |
|--------------------------------------------|----------------------------------|
| <b><i>Survey Date:</i></b>                 | 19/05/2026                       |
| <b><i>Survey Type:</i></b>                 | Preliminary Ecological Appraisal |
| <b><i>Temperature start:</i></b>           | 16°C                             |
| <b><i>Temperature finish:</i></b>          | 16°C                             |
| <b><i>Wind speed (Beaufort Scale):</i></b> | 0                                |
| <b><i>Cloud Cover (Oktas Scale):</i></b>   | 4                                |
| <b><i>Precipitation:</i></b>               | 0                                |

### Habitat Groups

3.7. During the field survey, areas of closely managed modified grassland were identified within the site. Adjacent to the grassland, a riparian habitat including ruderal/ephemeral vegetation is located adjacent to the River Long which was also assessed for protected species. None were found.

3.8. Figure 1 illustrates the location and extent of all habitats recorded on site.

Figure 1. Habitat Map



## Baseline Ecological Conditions

### Modified grassland

- 3.9. The area of impact, as well as the surrounding land within 5m, as shown within the habitat map above, is comprised of modified grassland, which was 're-laid turf' approximately 10 years ago. The grassland is subject to frequent management through mowing and supports a short sward (3-5cm in height) (images 1-4). The grassland is perennial ryegrass (*Lolium perenne*) dominant with a low species (grass and forb) diversity (approximately 1–4 species per m<sup>2</sup>). Species present included red clover (*Trifolium pratense*), ribwort plantain (*Plantago lanceolata*), dandelion (*Taraxacum officinale*), dock (*Rumex spp.*), yarrow, thistle, and meadow cranesbill. Around the periphery, there was occasional fleabane (*Pulicaria dysenterica*), hedge mustard (*Sisymbrium officinale*), and cinquefoil (*Potentilla spp.*). The proposal requires the temporary loss of a limited area (approximately 60m<sup>2</sup>) of modified grassland to enable the siting of the temporary marquee for a period of 6 months per year. The grassland is adjacent to the River Long with riparian edge species along the banks adjacent to the grassland, between 50-150cm in height. Species included common nettle (*Urtica dioica*), borage (*Borago officinalis*), cleavers (*Galium aparine*), docks, meadowsweet (*Filipendula ulmaria*), cow parsley (*Anthriscus sylvestris*), Himalayan balsam (*Impatiens glandulifera*), hogweed (*Heracleum sphondylium*), river dropwort (*Oenanthe sp.*), along with occasional regenerating ash (*Fraxinus excelsior*), elder (*Sambucus nigra*) and aspen (*Populus tremula*). The temporary structure on-site comprises a canvas marquee pitched with ropes and pegs measuring approximately 5 x W x 6m L x 2 m H. The structure hosts no foundation or floor, and is considered low impact, presenting no permanent or direct changes to the land or habitats on which it sits.
- 3.10. Overall, the habitat located on site and due to be impacted is considered to be of low botanical value due to its low species diversity as a sward typical of that by regular mowing. There was no evidence of protected species within 5m of the red line boundary, or within the wider blue line boundary, including otter, water vole, white-clawed crayfish, and kingfisher.

### Schedule 9 species

- 3.11. No schedule 9 (non-native, invasive) plant species were observed within the red line boundary. There was, however, Himalayan Balsam abundant along the riparian bank, which is a Schedule 9, non-native, invasive species. Care should be taken to prevent the spread of this species when operating on site, as it is detrimental to the health of watercourses.

### Protected species

#### Birds

- 3.12. The study returned records of a number of protected, priority or notable bird species within 2km of the site, including the Wildlife & Countryside Act 1981 (as amended) Schedule 1 species including House Martin (*Delichon urbicum*), Swallow (*Hirundo rustica*), Song Thrush (*Turdus Philomelos*), Mistle Thrush (*Turdus viscivorus*), Cetti's Warbler (*Cettia cetti*), Yellowhammer (*Emberiza citronella*), House Sparrow (*Passer domesticus*), Grey Partridge (*Perdix perdix*), Redwing (*Turdus iliacus*), Marsh Tit (*Poecile palustris*), Lapwing (*Vanellus vanellus*), Skylark (*Alauda arvensis*), Woodlark (*Lullula arborea*), Little Owl (*Athene noctua*), Tawny Owl (*Strix aluco*), Tree Pipit (*Anthus trivialis*), Kingfisher (*Alcedo atthis*), Yellow Wagtail

(*Motacilla flava*), Goldeneye (*Bucephala clangula*), Red-legged Partridge (*Alectoris rufa*), Corn Bunting (*Emberiza calandra*), Bullfinch (*Pyrrhula pyrrhula*), Cuckoo (*Cuculus canorus*), Turtle Dove (*Streptopelia turtur*), Starling (*Sturnus vulgaris*), Kestrel (*Falco tinnunculus*), Fieldfare (*Turdus pilaris*), Lesser Redpoll (*Acanthis flammea cabaret*), Meadow Pipit (*Anthus pratensis*), Reed Bunting (*Emberiza schoeniclus*), Curlew (*Numenius arquata*), Spotted Flycatcher (*Muscicapa striata*), Brambling (*Fringilla montifringilla*), Herring Gull (*Larus argentatus*), Black-headed Gull (*Chroicocephalus ridibundus*), Crossbill (*Loxia curvirostra*), Linnet (*Linaria cannabina*), Greylag Goose (*Anser anser*), Canada Goose (*Branta canadensis*), Egyptian Goose (*Alopochen aegyptiaca*), Brent Goose (*Branta bernicla*), Snow Goose (*Anser caerulescens*), Goosander (*Mergus merganser*), Teal (*Anas crecca*), Grey Heron (*Ardea cinerea*), Dunnock (*Prunella modularis*), Green Sandpiper (*Tringa ochropus*), Moorhen (*Gallinula chloropus*), Tufted Duck (*Aythya fuligula*), Mallard (*Anas platyrhynchos*), Coot (*Fulica atra*), Cormorant (*Phalacrocorax carbo*), Little Grebe (*Tachybaptus ruficollis*), Great Crested Grebe (*Podiceps cristatus*), Mandarin Duck (*Aix galericulata*), Snipe (*Gallinago gallinago*), Water Rail (*Rallus aquaticus*), Sand Martin (*Riparia riparia*), Shelduck (*Tadorna tadorna*), Muscovy Duck (*Cairina moschata*), Long-tailed Duck (*Clangula hyemalis*), Gadwall (*Mareca strepera*), Little Egret (*Egretta garzetta*), Mute Swan (*Cygnus olor*), Swift (*Apus apus*), Greenfinch (*Chloris chloris*), Great Spotted Woodpecker (*Dendrocopos major*), Lesser Spotted Woodpecker (*Dryobates minor*), Green Woodpecker (*Picus viridis*) and Woodcock (*Scolopax rusticola*). The area is in close proximity to the Thames Basin Heaths SPA, designated for internationally important populations of nightjar, Dartford warbler, and woodlark.

- 3.13. The modified grassland within the site provides some limited nesting and/or foraging opportunities for a variety of bird species, which may be found in the local area. The wider area comprising conifer plantation as part of Thames Basin Heath SPA, deciduous woodland, mature trees, scrub, native hedgerows, and the river provides elevated opportunities for birds. No evidence of nesting birds was found, and no dense vegetation exists within this area, which could harbour nests. All modified grassland was mown to a short sward and was limited in size.
- 3.14. On this basis, recommendations with respect to this species group are set out below to ensure that they are safeguarded throughout the development works. The modified grassland on site is not considered suitable for ground-nesting birds, but could offer foraging opportunities, and no evidence of use or nesting was observed. Therefore, it is considered that the current development proposals will not result in the loss of suitable breeding, or wintering bird habitat.
- 3.15. All occupied bird nests have legal protection from damage and destruction under the Wildlife & Countryside Act (1981). If any active bird nests are found in the areas that need to be cleared, the chicks must first be allowed to fledge before work proceeds.

## Reptiles

- 3.16. The area of modified grassland (species-poor) within the site offers limited potential to support common reptile species. This habitat is considered sub-optimal due to the lack of floristic diversity within the grassland and low sward height due to regular mowing. However, given the site's location adjacent to habitats of higher suitability, such as deciduous woodland and peripheral/ruderal vegetation, it is possible that reptiles pass through the site on occasion. Forty-three records for reptiles were found locally, including thirty-one common

lizard (*Zootoca vivipara*), seven slow worm (*Anguis fragilis*), three adder (*Vipera berus*) and two sand lizards (*Lacerta agilis*). The site does not comprise a suitable habitat for sand lizard, despite them occurring locally on heathland. The closest of these records was for a common lizard, located approximately 730m to the west of the site in 2021. The area of ruderal vegetation adjacent to the trees on the east and peripheral riparian vegetation to the west and south could offer sheltering, basking and foraging opportunities. The site and area of impact, however, are of a limited size and temporary, and it is considered likely that only a small number of common reptile species will utilise the site, if present.

- 3.17. Further to a habitat survey, it has been concluded that any reptile population present in adjacent habitats is likely to be limited to low numbers or the possible presence of transient common reptile species, as part of a wider home range.
- 3.18. Given that the proposed development will result in the temporary loss of a very small area of suitable reptile habitat and that the majority of the habitat within the site is sub-optimal for reptiles, it is not recommended that further survey work with respect to reptiles is carried out. To ensure that the proposed development area remains unfavourable, it is essential that the modified grassland area due to be impacted by the proposed development is maintained as a short sward until and throughout the phase of use. If the sward is maintained, then no further survey or mitigation is required. Although not proposed as necessary, any encroaching vegetation to be removed (e.g. tussocky grass or tall shrubs) should be done under the precautionary approach (RAMS) described below to avoid and/or minimise any unforeseen disturbance or residual impacts and account for any residual risk.
- 3.19. Further to a habitat survey and desktop study of the site, it has been concluded that due to the presence of a limited area of suitable habitat within the site boundary and in the wider area, as well as local records, it is possible that reptiles may pass through the site on occasion. In the absence of mitigation, any future necessary encroaching vegetation clearance work, as well as the seasonal erection and dismantling of the marquee, may have the potential to injure or kill amphibians passing through the site. Therefore, precautionary mitigation in the form of reasonable avoidance measures (RAMS), informed by best practice, has been recommended in case reptiles are present in nearby terrestrial habitat. This precautionary approach aims to avoid and/or minimise any unforeseen disturbance or residual impacts and account for any residual risk to reptiles by following best-practice methods of working;

#### Reasonable avoidance measures (RAMs)

The following RAMS should be implemented on site during the construction phase to avoid injury/killing of common reptiles, amphibians, and small mammals and should include.

#### Before and during the development

- Until works commence, to ensure that the proposed development area remains unfavourable to reptiles, it is essential that the modified grassland area due to be impacted by the proposed marquee is maintained as a short sward until and throughout the construction phase. If the sward is maintained, then no further survey or mitigation is required.

#### Staged vegetation clearance

- Any future necessary vegetation clearance where vegetation has encroached onto the red line boundary, whilst the marquee is not in use (e.g. including any tall, tussocky ruderal vegetation or marginal grassland), should be undertaken in a phased manner. Any tussocky, tall vegetation (e.g. tall grasses, nettles, cow parsley, etc) that are to be strimmed/mown in stages to encourage wildlife using the site to migrate off-site. This must be done between March and October, with the first cut at a height of 150mm. After a period of 48 hours, the sward is to be cut to less than 100mm and maintained at this height, as well as any arisings removed to discourage reptiles from using the site. Where vegetation clearance during March-August (inclusive) cannot be avoided, works should be carried out under the supervision of a suitably experienced ecologist, who will carry out checks for breeding birds and their nests in advance of removal works commencing. Only once the ecologist is satisfied that no legal offence could occur would works be permitted to proceed. The removal of any dense riparian vegetation should be carried out carefully by hand, to ensure that any amphibians, reptiles, or European hedgehogs, which may be present, can escape unharmed.

#### Materials and storage

- During reception or dismantling phases, any materials or tools on site should, where possible, be stored off the ground on palettes or sleepers to ensure that artificial refugia which could be used by sheltering reptiles are not created. The materials will then be inspected prior to use. Where possible, open excavations and trenches (in this instance, holes left by marquee pegs) should be filled in or covered by the end of every working day. Alternatively, the ends of the trench should be left at an angle of around 45° in order to allow any reptiles or amphibians which may fall into the trench to escape unassisted.

#### Further considerations

- A buffer zone of at least 5m, where feasible, comprising managed grassland, around the marquee/red line boundary will provide a buffer between more sensitive habitats within the local area and the human disturbance.
- In the unlikely event that reptiles are found on site during works, the project manager should contact an ecologist to supervise their removal and release. Wild Earth Ecology can be reached on 07930216662.

#### Compensation

- 3.20. To provide a new resting and hibernating habitat for reptiles that potentially feature within the area and may occasionally occur on site, a habitat brash pile/hibernaculum will have been incorporated into the ecological enhancement recommendation for the site.
- 3.21. Providing the above mitigation and compensation measures are adhered to, it is anticipated that there will be no residual impacts of the current proposals on reptiles.

#### Amphibians

- 3.22. Thirty-four records for amphibians were returned within 2km of the site, including fourteen for common toad (*Bufo bufo*), ten for common frog (*Rana temporaria*), six for great crested newt (*Triturus cristatus*), three for Palmate newt (*Lissotriton helveticus*) and one for marsh

frog (*Pelophylax ribibundus*). The closest of these were records for a common toad, common frog, Palmate newt, and great crested newt, all located in the same place, approximately 855m to the west of the site between 2017 and 2023. The records of Great crested newts were recorded between 2015 and 2024, and were located to the south, southwest and west of the site between 850m and 1.95km. No evidence of amphibian presence was recorded during the survey.

- 3.23. Eleven waterbodies have been identified within 500m of the proposed development site (Map 3). No lotic freshwater bodies are present within the site boundary; however, the River Long runs adjacent to the west and south of the site (images 4-6). The southern portion is wide at approximately 6m, and the western portion is narrower as it flows through the mill structure. Both are fast-flowing. The next nearest waterbody is a private pond adjacent to the eastern site boundary (P1), which was fully assessed and was dry. Dense vegetation has filled it. P2 can be found 80m east of the site (image 5). An additional private pond, P3, is located 140m northeast of the site and was inaccessible at the time of survey. Further ponds are located 210m (P4), 320m (P7), 400m (P8) and 450m (P9) to the west of the site boundary. These were all inaccessible but are part of a commercial water processing unit and thus not a terrestrial pond habitat, being unsuitable for Great Crested Newts. P5 is located 270m east, and P6 is located 365m northeast of the site. These were both inaccessible. A final pond can be found 390m to the southeast of the site boundary (P10), which was observed to be dry at the time of the survey. A mixture of open grassland and woodland lies between these ponds, rivers, and the site, with a low traffic, unlit tarmac road lying between the site and P4, P7-P9. Therefore, it is considered that there is a minimal barrier for commuting amphibians. The terrestrial habitats within the proposed site are considered sub-optimal in suitability, with the modified grassland maintained at a short sward. The area within the larger survey area (5m from the boundary) contains a limited area of potential terrestrial and breeding habitat for common amphibian species, including the riparian peripheral vegetation, log and debris piles, and adjacent scrub, which could offer limited opportunities for refugia during their terrestrial phase. An HSI was performed on P2 and scored 0.52 (below average suitability) to support the great crested newt, largely on account of its area and poor water quality. The site is located within a red area (indicating high habitat suitability for GCN) on the NatureSpace Partnership GCN impact risk zone map. GCN are known to routinely disperse 500m from breeding ponds to areas of dense scrub, woodland, or grassland habitat. Based on the area of the site to be impacted, the location of the nearest water bodies to the site and known breeding ponds for GCN within the wider region, a Rapid Risk Assessment calculation carried out for the site identifies that if breeding GCN are present in ponds identified within 500m of the site and in the absence of mitigation an offence is 'highly unlikely' at that distance from a known breeding pond or record (Table 4).

**Table 4. Rapid risk assessment for Great crested newt**

| Component                                | Likely effect (select one for each component; select the most harmful option if more than one is likely; lists are in order of harm, top to bottom) | Notional offence probability score |
|------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------|
| Great crested newt breeding pond(s)      | No effect                                                                                                                                           | 0                                  |
| Land within 100m of any breeding pond(s) | No effect                                                                                                                                           | 0                                  |
| Land 100-250m from any breeding pond(s)  | No effect                                                                                                                                           | 0                                  |
| Land >250m from any breeding pond(s)     | 0.01 - 0.1 ha lost or damaged                                                                                                                       | 0.001                              |
| Individual great crested newts           | No effect                                                                                                                                           | 0                                  |
|                                          | Maximum:                                                                                                                                            | 0.001                              |
| Rapid risk assessment result:            | GREEN: OFFENCE HIGHLY UNLIKELY                                                                                                                      |                                    |

Map 3. Location of the nearest waterbodies to the site (application site shown as a red dot)

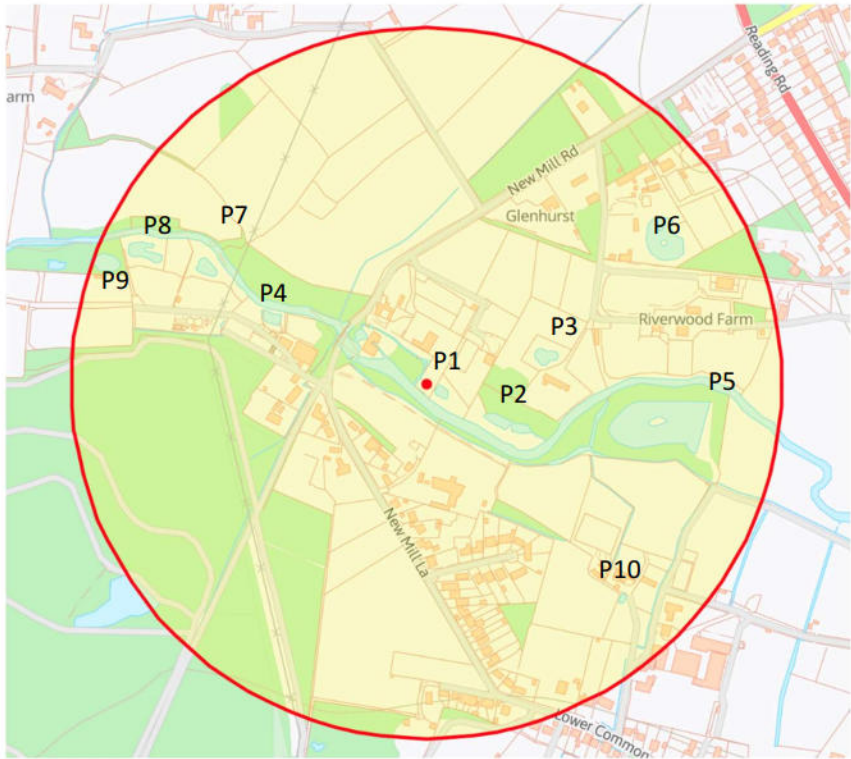


Table 5. HSI Results for P2

| ARGUK GCN HSI Calculator                 |                     |                  |
|------------------------------------------|---------------------|------------------|
| Pond Name                                |                     | Grid Ref         |
| Grid Ref                                 |                     |                  |
| SI No                                    | SI Description      | Pond 2           |
| 1                                        | Geographic location | 1                |
| 2                                        | Pond area           | 0.1              |
| 3                                        | Pond permanence     | 0.9              |
| 4                                        | Water quality       | 0.67             |
| 5                                        | Shade               | 1                |
| 6                                        | Water fowl effect   | 0.67             |
| 7                                        | Fish presence       | 0.33             |
| 8                                        | Pond Density        | 1                |
| 9                                        | Terrestrial habitat | 0.33             |
| 10                                       | Macrophyte cover    | 0.3              |
| HSI Score                                |                     | 0.52             |
| Pond suitability (see below)             |                     | Below average    |
| Categorisation of HSI Score by Lee Brady |                     |                  |
| HSI Score                                |                     | Pond Suitability |
| < 0.50                                   |                     | Poor             |
| 0.50 - 0.59                              |                     | Below average    |
| 0.60 - 0.69                              |                     | Average          |
| 0.70 - 0.79                              |                     | Good             |
| > 0.80                                   |                     | Excellent        |

## Impacts & Mitigation

- 3.24. Based on the area of the site to be impacted and the location of the nearest lentic water bodies to the site, which could be assessed using an HSI, showing that the pond located 80m to the east presents 'below average' suitability to support GCN. Therefore, no further surveys for this species are recommended.
- 3.25. Based on these waterbodies being located nearby, it is possible that common amphibians may pass through the site on occasion. However, if an individual is displaced, it will have minimal impact on this species' conservation value. It is considered that the mitigation measures outlined above including RAMS, which also apply to small mammals and reptiles, will safeguard any common amphibians in the event that they are present within the site during the development works. Any green vegetation, including grassland and tall ruderal such as nettles or thistles, to be removed (if they are to encroach on the red line boundary) should be done so carefully following the RAMS and allow any animals which may be present to escape. Any animals found remaining in the area should be carefully picked up in a gloved hand and moved to a suitable habitat (such as the surrounding woodland). In the unlikely event that GCN are found during site works, all works must stop immediately, and a suitably qualified ecologist must be consulted. Research suggests that the vast majority of the GCN populations shelter within 50m of a standing water body, although this is certain to depend on the availability of suitable habitat. Jehle *et al* suggest the maximum extent of nightly migration to be 100m (based on several studies), which indicates the potential distance an animal could disperse during an active season, if desired. The fact that most animals appear not to do so is more telling. Also, home ranges/dispersal distances are always going to vary depending on habitat quality/availability and distribution, yearly or seasonal environmental changes, habitat losses/gains, animal age/sex/health, seasonal changes in resources, hibernation migrations, etc. In the absence of a detailed survey, it is reasonable to consider these factors to form a reasonable hypothesis as to the risk of impact. Therefore, to protect both reptiles and amphibians, the precautionary approach (RAMS) described aims to avoid and/or minimise any unforeseen disturbance or residual impacts and account for any residual risk.

## Dormice

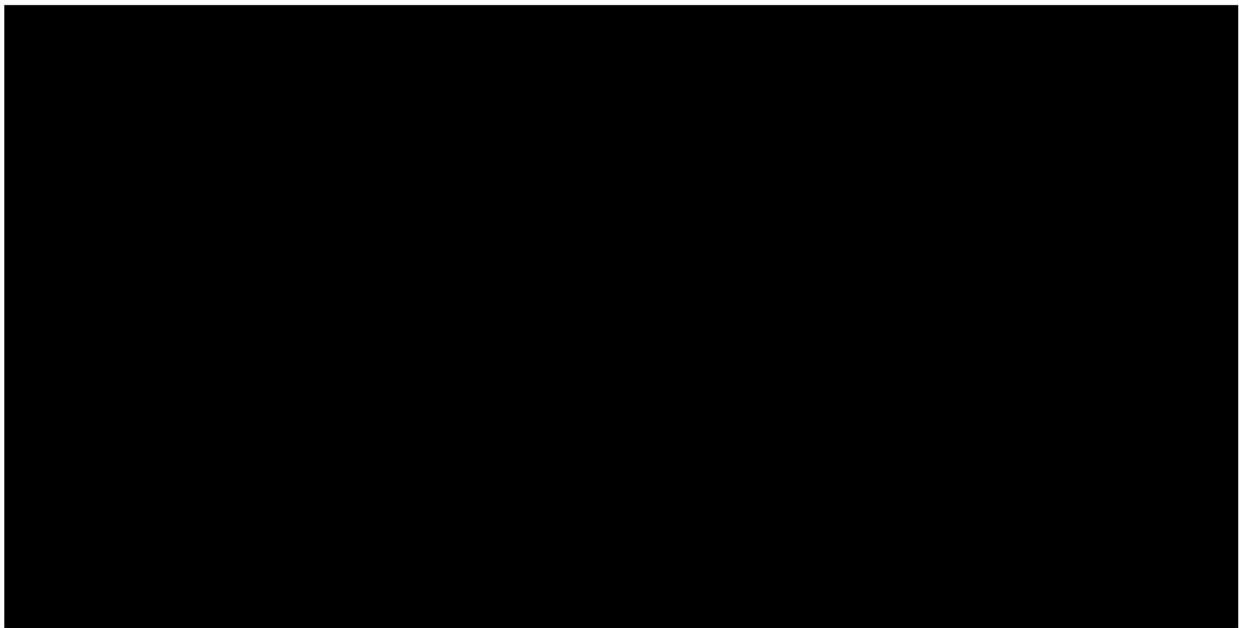
- 3.26. No records of Hazel dormouse (*Muscardinus avellanarius*) were found within 2km of the site boundary. No European Protected Species licences for hazel dormouse were returned within 2km. The habitats on-site offer limited ecological value to dormice, with a lack of connectivity across the canopy over the River Long, presenting a clear barrier for dispersal. Some of the habitats adjacent, such as deciduous woodland and scrub to the east, do offer suitability but are not proposed to be impacted.
- 3.27. Dormice are unlikely to be present and therefore, no impacts are anticipated on this species. It is not recommended that further survey work be carried out with respect to this species.

## Hedgehog

- 3.28. The data search revealed a total of thirteen records of hedgehogs within 2km of the site, as close as 70m to the southeast. Hedgehogs are known to feature within the local area, and the modified grassland and hedgerows on site are considered suitable habitat for foraging,

commuting, and hibernating hedgehogs. Therefore, it is considered likely that they are present on site on occasion.

- 3.29. Hedgehogs may be present on site and are likely to pass through the site. Hedgehogs are listed as a Priority Species for Conservation Action under the UK Biodiversity Action Plan and protected from harm in the UK under Schedule 6 of the Wildlife and Countryside Act 1981. Under the NERC Act 2006, the hedgehog is categorised as a 'Species of Principal Importance' for biodiversity.
- 3.30. Hedgehogs do not exhibit fight or flight behaviour and will therefore not move out of the way during works. Any areas of dense vegetation on the site that are due to be cleared should be cleared carefully by hand. Any hedgehogs encountered are carefully removed to a safe place off-site.



#### **Brown Hare**

- 3.33. The limited area of modified grassland within the site boundary provides sub-optimal foraging habitat. No evidence of Brown hare was found within the survey area, and no records were returned within 2km of the site.
- 3.34. Even if brown hare are present on site, the limited size of the development would have minimal impact on this species, and the mitigation measures outlined above with respect to hedgehogs and [REDACTED] will safeguard them in the event that they are present within the site during the development works.

#### **Bats**

- 3.35. Multiple confirmed records for varied bat species, including Brown long-eared (*Plecotus auratus*), common pipistrelle (*Pipistrellus pipistrellus*) and soprano pipistrelle (*Pipistrellus pygmaeus*), were returned within 2km of the site. Additionally, eight European Protected Species Mitigation Licences (EPSM) for bats were present within 2km of the site boundary.

The closest EPSM to the site was for a soprano pipistrelle roost located approximately 100m to the west due to the destruction of a resting place.

- 3.36. No structures or trees that are due to be impacted are located within the site boundary and there are no potential roosting opportunities present, although the modified grassland and hedgerows/treelines in the wider site provide potential foraging and commuting opportunities for a range of bat species. The site, however, is limited in size, and the habitats are not considered to form part of a significant resource for foraging/commuting bats. The site itself is considered to offer low suitability for foraging and commuting bats, and will only be in use during daytime hours, and not at night when bats are active. Furthermore, no additional lighting is proposed.
- 3.37. It is understood that no trees located on or within close proximity to the site will be impacted under the current development proposals. These features are of ecological value to foraging and commuting bats.
- 3.38. All retained trees (off-site) should be protected throughout the development in accordance with British Standards BS 5837:2012. Root protection areas should be 12x the diameter at breast height (DBH) or the reach of the longest branch (whichever is greater), unless otherwise advised by a qualified arboriculturist. The mature trees located off-site on or adjacent to the northern and eastern boundaries will likely have their roots on-site and should remain protected. No materials should be allowed to be stored within these root protection areas, and no heavy machinery should run over them.

#### Lighting

- 3.39. **No new lighting is proposed within this application and use of the marquee will not occur at nighttime when bats are active.** The following standardised advice has been presented for context. Where light spills occur on linear habitat features, such as hedgerows or trees, this may deter bats, especially the more light-averse bat species, that may use these features. Bats are highly sensitive to light and could potentially avoid the area if access points or the surrounding areas become further lit. As other foraging and commuting bats are likely to be present in the local area and light-sensitive species such as woodland specialist bat species have been recorded locally, it is recommended that any new external lighting be directed to avoid light spillage onto vegetation or foraging features such as the hedgerows to the west and south, and the grassland surrounding the site. Appropriate lighting options will prevent a negative impact on bats potentially using the habitats on site and should be approved by a suitably qualified Licensed Bat Ecologist. No light from the use of the marquee should spill onto the adjacent River long, riparian habitat or mature trees nearby.
- 3.40. Any potential impact on bats can be minimised through the use of “warmer” lights, as these are less penetrating than bright white lights (such as LEDs), as well as maintaining the brightness as low as possible and limiting the times during which the lighting can be used to provide some dark periods. Motion sensors are strongly recommended, using a short timer to reduce the duration of lighting and reduce disturbance to bats. In addition, directing the lighting to where it is needed to avoid light spillage onto vegetated margins and minimising lighting upward by fitting lights with downward-facing baffles to avoid light pollution will also mitigate the impact of any new lighting on bat species.

- 3.41. Light can be restricted by fitting hoods which direct the light below the horizontal plane, at an angle less than seventy degrees. Limiting the height of lighting columns and directing light at a low level away from vegetation reduces the ecological impact of the light.

Other approved brands are also available and can be provided on request.

#### Residual & cumulative Effects

- 3.42. No significant residual effects are anticipated on any of the species considered within this report. Therefore, there will be no cumulative effects on local populations as a result of the proposed works if the above mitigation and compensation outlined above are followed.

#### Impacts of Proposed Development

- 3.44. Table 8 – Summary of potential impacts of the proposed development on protected species

| Species                | Ecological Evaluation<br>(including scale and nature of impact*) | Further survey recommendations                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|------------------------|------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Amphibians             | Negligible - Low                                                 | <b>RAMS (section 3.20) will apply to any future necessary vegetation removal from encroachment, including tall ruderal vegetation or grassland.<br/>All other vegetation to be removed should be done so carefully by hand in order to allow any animals which may be present to escape.</b>                                                                                                                                                                                          |
| Reptiles               | Negligible - Low                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| West European Hedgehog | Moderate                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Bats                   | Negligible                                                       | No further surveys recommended                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| Hazel Dormouse         | Negligible                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Great crested newt     | Negligible                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|                        | Low                                                              | Any trenches or ditches (such as a hole created by marquee peg removal) created during erection/dismantling should be covered at night or provide a means of escape for mammals.                                                                                                                                                                                                                                                                                                      |
| Brown hare             | Low                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Nesting birds          | Low                                                              | In order to protect bird nests and comply with the law protecting them, any necessary (dense) vegetation removal should take place outside of the breeding bird season, which is generally considered to be from March to September inclusive. If this is not possible, prior to removal, such vegetation should first be checked for the presence of nesting birds by an experienced ecologist. If any nests are found, they will be left undisturbed until the chicks have fledged. |

*\*Ultimate assessment of the scale and nature of impacts is dependent on the final design of the proposed development and the exact habitats affected.*

#### 4.0. Enhancement recommendations

- 4.1. The Local Planning Authority (LPA) has a duty to ask for enhancements under the NPPF (2021). Recommendations have been made for modest post-change of use ecological enhancement at the site that are proportionate with the low level of environmental impact from the proposed works. The following recommendations have been made, proportionate to the scale

of the development and appropriate for the species found locally. Below is a summary of measures, which should be implemented on-site to achieve a minimum no net loss of functional habitat for biodiversity from those areas due to be impacted, as well as to enhance the area for wildlife long-term. The recommended on-site location for each ecological enhancement has been included on a site plan in Appendix 3. Full maintenance advice for the long-term management of each of these features will also be provided to the client to ensure the optimum benefit to wildlife. Any future landscaping planting should seek to enhance biodiversity, improve connectivity to the surrounding habitats, and provide food and shelter for a wide range of faunal species. Non-invasive species should not be planted. Any invasive species found to be currently on site should be removed with care during vegetation clearance and disposed of appropriately.

- 4.2. This project comprises <0.25m<sup>2</sup> of green habitat due to be permanently impacted and on this basis, meets the exemption criteria from Biodiversity Net Gain. A full exemption justification has been provided within the application.
- 4.3. As records of a range of bat and bird species, including WaCA 1981 (as amended) and UK BAP priority species, have been returned from within the habitats surrounding the site, it is recommended that a number of roost/nest boxes be incorporated into the proposed development in order to improve the availability of roosting and nesting opportunities for these species' groups.
- 4.4. Providing the mitigation and enhancement recommendations included in the report are implemented appropriately, the proposed development will not have a negative impact on the biodiversity of the site and may result in tangible benefits for wildlife in the local area through the provision of nesting, foraging, and roosting habitat.

#### Bat & Bird boxes

- 4.5. As records of a range of bat and bird species, including WaCA 1981 (as amended) and UK BAP priority species, have been returned from within the habitats surrounding the site, it is recommended that a number of roost/nest boxes be incorporated into the proposed development in order to improve the availability of roosting and nesting opportunities for these species groups.
- 4.6. It is recommended that one stand-alone bat box be sited to enhance opportunities for bats post-development. One 1FF Schwegler Bat Box or equivalent (dependent on product availability, e.g., Beaumaris Bat Box, Vivara Pro Woodstone Bat Box) should be installed on a suitably retained tree nearby. A suitable location for this might be on either of the mature oak or aspen trees, adjacent to the site. The position of a box should have a clear route of entry to it and be free from dense vegetation or branches. To maximise opportunity, multiple bat boxes can be placed on the trunk of the same tree at a similar height, facing in different directions (south to southwest) to offer a choice between thermal conditions. Any further detailed advice on the location and erection of these boxes can be sought from the author of this report and is subject to the mitigation specified by the bat licence to follow. The bat box should ideally be made of woodcrete and be positioned at least 3-5m high, in a south or south-west facing direction with a clear flight path to and from the entrance (free from obstruction) and away from artificial light such as sensor-operated flood lights. Please note that the inclusion of a bat box on a tree or building does not mean that bats will be attracted to roosting

within the building itself. The installation of bat boxes within the vicinity of the site will provide additional roosting habitat for bats. Bats often require time to locate new roosting sites, and it may be several years before a box is colonised.

- 4.7. Consideration should be given to the provision of nest sites for tawny owl within the development area to further enhance the value of the application site for breeding birds. A tawny owl box should be installed on a suitable retained mature tree nearby. The position of a box should have a clear route of entry to it and be free from dense vegetation or branches

The following design, or similar, is considered appropriate and could be located on any mature tree to the far north or east of the amenity garden adjacent to the watercourse.

[https://www.wildcare.co.uk/wooden-tawny-owl-nest-box.html?ppc\\_keyword=&campaignid=22698191254&adgroupid=&adid=&gad\\_source=1&gad\\_campaignid=22694470499&gbraid=0AAAAABRqD\\_ZrCZ0KcBzyp9lAXrQ9IekiD&gclid=CjwKCAjwuanRBhBSEiwAY5y6V1OqPIXKHwDDS3Uc6Vf9wqmYMXsH5Ph7SeVmuG7NHUcWtLILf5f7JR0cCbQcQAvD\\_BwE](https://www.wildcare.co.uk/wooden-tawny-owl-nest-box.html?ppc_keyword=&campaignid=22698191254&adgroupid=&adid=&gad_source=1&gad_campaignid=22694470499&gbraid=0AAAAABRqD_ZrCZ0KcBzyp9lAXrQ9IekiD&gclid=CjwKCAjwuanRBhBSEiwAY5y6V1OqPIXKHwDDS3Uc6Vf9wqmYMXsH5Ph7SeVmuG7NHUcWtLILf5f7JR0cCbQcQAvD_BwE)

#### Deadwood habitat pile

- 4.8. To enhance the site for reptiles, amphibians, invertebrates, and hedgehogs, it is recommended that a log or brash pile be created on-site in a secluded location adjacent to areas of suitable on-site habitat such as tussocky grassland, hedgerows, or mature trees preferably with materials from the site. Any felled material on site can be used to create small log piles (300-500mm lengths) or trimmed and used to create a hibernaculum for sheltering reptiles as described above. A suitable location for the habitat pile would be in the northeastern corner adjacent to the mature trees and scrub, offering refuge for amphibians and reptiles within their terrestrial, or hibernation phase. Further information on creating deadwood or brash piles can be found at:

<https://www.rspb.org.uk/birds-and-wildlife/advice/gardening-for-wildlife/dead-wood-for-wildlife/>

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## 6.0. Appendix

### Appendix 1 – Protected Species Legislation

#### Bats

In England and Wales, all bat species and their roosts are legally protected under the Wildlife and Countryside Act (1981) (as amended); the Countryside and Rights of Way Act, 2000; the Natural Environment and Rural Communities Act (NERC, 2006); and by the Conservation of Habitats and Species Regulations (2019) (as amended). You will be committing a criminal offence if you:

- Deliberately capture, injure, or kill a bat
- Intentionally or recklessly disturb a bat in its roost or deliberately disturb a group of bats
- Damage or destroy a bat roosting place (even if bats are not occupying the roost at the time)
- Possess or advertise/sell/exchange a bat (dead or alive) or any part of a bat
- Intentionally or recklessly obstruct access to a bat roost

Barbastelle, Bechstein's, greater horseshoe, lesser horseshoe, brown long-eared, soprano pipistrelle, and noctule bats are all priority species under the UK Biodiversity Action Plan (UK BAP) and have also been adopted as species of principal importance in England under Section 41 of the NERC Act 2006.

#### Badgers

Badgers and their setts are afforded strict protection under the Protection of Badgers Act 1992. This Act consolidates past badger legislation and, in addition to protecting the badger itself, makes it an offence to damage, destroy or obstruct badger setts. Badgers are also protected under Schedule 6 of the Wildlife and Countryside Act 1981 (as amended), and listed under Appendix III of the Bern Convention, as a species that is in need of protection but may be hunted in exceptional instances. Only badger setts that are currently in use are covered by wildlife legislation.

#### Birds

All wild birds in the UK are protected under Section 1 of the Wildlife and Countryside Act 1981 (as amended) which makes it an offence to intentionally kill, injure or take any wild bird or to take, damage or destroy the nest or its eggs. Some bird species, such as the barn owl *Tyto alba*, are listed in Schedule 1 of the 1981 Act and receive further protection, making it an offence to intentionally or recklessly disturb these birds whilst building a nest or in, on or near a nest containing eggs or young; or to disturb dependent young of such a bird. The NERC Act (2006) inserts a new schedule into the Wildlife and Countryside Act (1981) to protect the nests of some bird species that regularly re-use their nests, even when the nests are not in use. This protection currently applies to golden eagle, white-tailed eagle, and osprey.

## Reptiles

All British reptiles are listed under schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and are therefore protected from intentional killing or injury. This is largely as a consequence of a national decline in numbers associated with habitat loss. Two scarcer native British reptiles (smooth snake *Coronella austriaca* and sand lizard *Lacerta agilis*), are afforded 'full' protection. This legislation makes it an offence to intentionally or recklessly kill, injure, disturb, take, possess, or sell these species (in all life stages). It is also illegal to damage, destroy or obstruct access to places they use for breeding, resting, shelter, and protection. All species of reptile are priority species in the UKBAP and have been adopted as Species of Principal Importance under Section 41 of the NERC Act (2006) in England (Section 42 in Wales).

## Amphibians

Great crested newts (GCN's) and their habitats are fully protected by the Conservation of Habitats and Species Regulations (2019) and partially protected under the Wildlife and Countryside Act 1981 (as amended). This legislation makes it an offence to kill, injure or capture GCN's, their young or eggs, or destroy / damage their ponds or places of shelter used for breeding or protection. The great crested newt is also a Priority species in the UK Biodiversity Action Plan (UKBAP) and had been adopted as a Species of Principle Importance in England under Section 41 of the NERC Act 2006. The natterjack toad *Epidalea calamita* is fully protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and Schedule 2 of The Conservation of Habitats and Species Regulations 2019 making it a European Protected Species. The natterjack toad is also a priority species under the UK Biodiversity Action Plan. The pool frog *Rana lessonae* is protected under the Conservation (Natural Habitats & C.) Regulations 1994 (as amended). As a European protected species, the deliberate capturing, disturbing, injuring, or killing of this species is prohibited, as is damage or destruction of its breeding sites or resting places. The pool frog is also a priority species under the UK Biodiversity Action Plan due to a 100% decline over 25 years (1980-2005). Common toads are also designated UKBAP species due to a serious decline of populations across large areas of southern, eastern, and central England, thought to be mainly due to changes in habitat management, mortalities on the roads, and climate change.

## Dormice

Common dormice *Muscardinus avellanarius* and their habitats are fully protected by both the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations (2019). This legislation makes it an offence to kill, injure, disturb, or capture dormice, or destroy or obstruct their resting or breeding places. The dormouse is also a priority species under the UK Biodiversity Action Plan and has been adopted as a species of Principal Importance in England under Section 41 of the NERC Act 2006 (section 42 in Wales) and so is protected from any adverse effects as a result of development.

## **Otters**

Otters are protected by both the Wildlife and Countryside Act 1981 (as amended) and The Conservation of Habitats and Species Regulations 2019. This legislation makes it illegal to; deliberately or recklessly kill, injure, or capture an otter, deliberately or recklessly disturb or harass an otter, damage, destroy or obstruct access to a breeding site or resting place of an otter.

The otter is also a UK BAP Priority Species and has been adopted as a Species of Principal Importance in England under Section 41 of the NERC Act 2006 (Section 42 in Wales) and the Conservation (Scotland) Act in Scotland.

## **Water Voles**

Water voles *Arvicola terrestris* are fully protected under the Wildlife and Countryside Act 1981 (as amended). This legislation makes it an offence to kill or injure water voles, and to damage, destroy or obstruct access to places used for protection or shelter, and to disturb water voles whilst they occupy such a place. The water vole is also a Priority species in the UK Biodiversity Action Plan and had been adopted as a Species of Principal Importance in England under Section 41 of the NERC Act 2006.

## **White-clawed Crayfish**

The white-clawed crayfish *Austropotamobius pallipes* is protected under the Wildlife and Countryside Act 1981 (as amended), making it a criminal offence to; intentionally or recklessly kill or injure a white-clawed crayfish, or sell or attempt to sell any part of this species. The Habitats Regulations (2019) provide further protection through the declaration of Special Areas of Conservation (SAC). This protection aims to prevent commercial harvesting of white clawed crayfish and prohibits their capture without a licence. The white-clawed crayfish is also a Priority species in the UK Biodiversity Action Plan (BAP) and has been adopted as a Species of Principal Importance in England under Section 41 of the NERC Act 2006.

## **Hedgehogs**

Hedgehogs are UK Biodiversity Action Plan (BAP) species and therefore must be taken into consideration as part of development planning. A recent report (Wembridge, 2011) shows that hedgehog numbers have declined by 25% in the last ten years.

## **Stag Beetles**

Stag Beetles *Lucanus cervus* are protected under section 5 of the Wildlife and Countryside Act 1981 (as amended). This legislation prohibits: The killing, injuring, or taking of Stag Beetles; the damage, destruction, or obstruction of access to any structure or place which Stag Beetles use for shelter or protection; or the disturbance of Stag Beetles while they are occupying a structure or place which they use for that purpose.

## Appendix 2 - Planning Policy and Legislation

### Planning and Biodiversity

The biodiversity policies which are most relevant are the National Planning Policy Framework (NPPF, 2012), Biodiversity 2020, the Biodiversity Action Plan for Hampshire, and Hart District Council (2018-2023).

### National Planning Policy Framework (NPPF) 2021

NPPF aims to minimise impacts on biodiversity and provide net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity. Chapter 179 refers to Habitats & Biodiversity stating that to protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national, and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration, or creation; and
- b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

Para. 180:

When determining planning applications, local planning authorities should apply the following principles:

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons<sup>(63)</sup> and a suitable compensation strategy exists; and

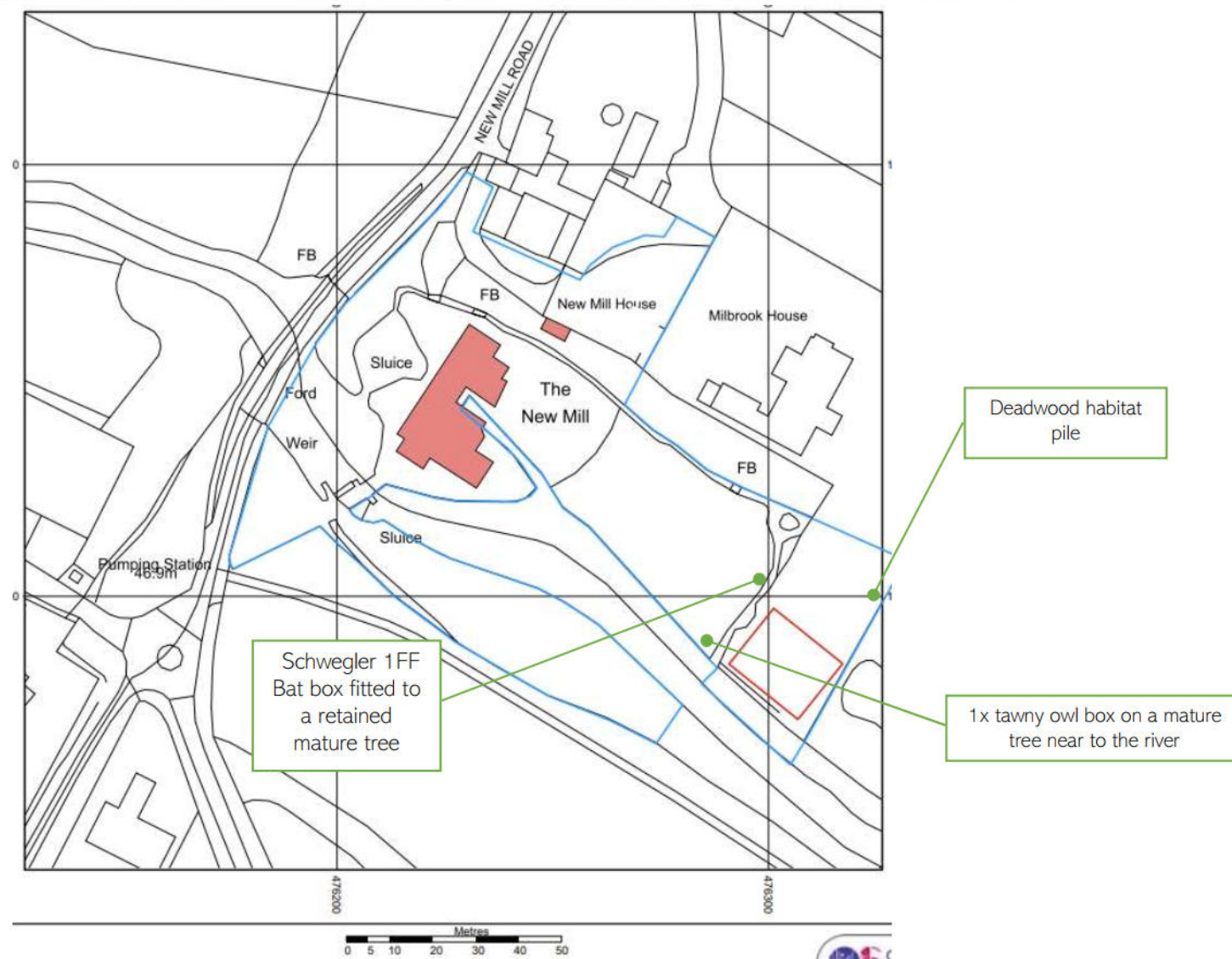
d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

#### UK Biodiversity Action Plan & Habitats and Species of Principal Importance

The UK Biodiversity Plan (BAP) was a programme designed to help conserve the UK's biodiversity. It led to the production of 436 action plans between 1995 and 1999 to help many of the UK's most threatened species and habitats to recover. A review of the UK BAP priority list in 2007 led to the identification of 1,150 species and 65 habitats that met the BAP criteria at UK level. Currently 56 Habitats of Principal Importance and 943 Species of Principal Importance are included within Schedule 41 of the NERC Act, and these include species and habitats which were identified in the UK BAP and which continue to be considered to represent the conservation priorities of England in the UK Post-2010 Biodiversity Framework.

Species of Principal Importance and Habitats of Principal Importance are those identified as the most threatened and requiring conservation action under the Schedule 41 of the UK Biodiversity Action Plan & Habitats and Species of Principal Importance. Species include West European hedgehog *Erinaceus europaeus*, great crested newt *Triturus cristatus*, dormouse, and common toad *Bufo bufo*.

Appendix 3. A. Ecological Enhancement Recommendation Site Plan (adapted from Proposed site plan, Masker Architects, 2026).



#### Appendix 4. Photographs of the habitats on site



Image 1-4. View of site showing area of modified grassland from the northern boundary (top left), from the southwest corner showing the western portion of the site (top right), from the north showing the north of the site (bottom left), from the north showing the eastern portion of the site (bottom right).



Image 4-6. View of surrounding river to the south of the site (top) and to the west of the site (bottom left and right).



Image 5. View of P2 from the south



Image 6. View of the marquee internally from the entrance door