



PRELIMINARY ECOLOGICAL APPRAISAL

**Toutley Depot
Old Forest Road
Wokingham
Berkshire
RG41 1QN**

Document date: 27th February 2026

Document ref: 6852E/26/01

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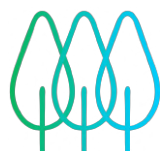


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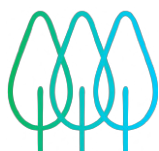


1 EXECUTIVE SUMMARY

PJC Consultancy Ltd was commissioned by Wokingham Borough Council to provide a Preliminary Ecological Appraisal in support of the proposed development at Toutley Depot, Old Forest Road, Wokingham, Berkshire, RG40 5QS. The purpose was to classify the habitats present, highlight the potential of the site to support protected species, and recommend suitable avoidance, mitigation, compensation and ecological enhancement measures where appropriate. When implemented successfully, these recommendations will ensure that the development proceeds in line with all relevant laws pertaining protected species and their habitats, as well as contributing to an increase in site biodiversity. This report has been produced in accordance with National Planning Policy Framework NPPF (2024) – more specifically Chapter 15 ‘Conserving and Enhancing the Natural Environment’ as well as the Adopted Core Strategy Development Plan (Wokingham Borough Council, 2010).

Based on current proposals, the results of the Preliminary Ecological Appraisal can be summarised in the following table:

Protected Species/Habitats	Suitable Habitat Present	Recommended Further Surveys	Ecological Mitigation
Bats (Roosting, buildings)	Four buildings (B1, B2, B3 and B4) within the Site were identified as having low potential to support roosting bats.	A single bat emergence survey should be undertaken on the buildings between May and August inclusive.	Further requirements for mitigation, compensation and/or licences may be required for bats depending on the results of the recommended further surveys. A sensitive lighting strategy and general best construction environmental practice should be adopted during the demolition, construction and operational phases of the proposed development to direct new artificial lighting away from suitable bat foraging and commuting routes, creating dark buffer zones.
Bats (Roosting, trees)	Several trees immediately adjacent to the Site were identified as having potential to support roosting bats.	None required, providing the avoidance and mitigation measures are adhered to.	An inspection of trees T6, T8, T14, T15 and T21 should be undertaken immediately prior to pruning or felling (if required), under the instruction and supervision of a suitably licenced ecologist. It is also recommended that, where felling is required, the trees be soft-felled in sections that contain potential roost features, undertaken outside the core hibernation period (outside November to March).



Bats (Foraging and Commuting)	The Site was identified as having low habitat suitability to support commuting and foraging bats.	None required, provided the appropriate avoidance and mitigation measures are adhered to.	A sensitive lighting strategy and general best construction environmental practice should be adopted during the construction and operational phases of the proposed development to direct new artificial lighting away from suitable bat foraging and commuting routes, creating dark buffer zones.
Badgers, foxes and rabbits	The Site was considered to provide some limited foraging, commuting and sett, den or warren building opportunities for badgers, foxes and rabbits. Evidence of foxes was found on Site.	None required, provided the appropriate avoidance and mitigation measures are adhered to.	A pre-works check should be undertaken immediately prior to any construction works commencing to ensure no new setts, dens or warrens have become established. Any required excavations should be excavated individually and backfilled immediately after to avoid animals becoming trapped. All chemicals onsite should be stored correctly and be made inaccessible to badgers and other animals.
Dormice	The Site was identified as providing some very limited foraging, commuting, nest building and hibernating opportunities for dormice.	None required, provided the appropriate avoidance and mitigation measures are adhered to.	A Precautionary Non-Licensed Method Statement (Appendix VI) should be adhered to throughout all phases of the proposed development. A sensitive lighting strategy and general best construction environmental practice should be adopted during the construction and operational phases of the proposed development.
Great Crested Newts (GCN)	The Site was identified as having very limited potential to support GCN during their terrestrial lifecycle phase.	None required, provided the appropriate avoidance and mitigation measures are adhered to.	A Precautionary Non-Licensed Method Statement (Appendix VI) should be adhered to throughout all phases of the proposed development.
Reptiles	The Site was identified as having limited potential to support reptiles providing foraging, commuting, basking	None required, provided the appropriate avoidance and mitigation measures are adhered to.	A Precautionary Non-Licensed Method Statement (Appendix VI) should be adhered to throughout all phases of the proposed development. Furthermore, it is recommended that the grass and ruderal



	and hibernating opportunities.		vegetation within the Site be maintained at a short sward length <10cm leading up to and during the construction phase of the proposed development, to reduce the likelihood of the habitat becoming increasingly suitable for reptiles.
Nesting Birds	The Site was identified as having potential to support nesting birds.	None required, provided the appropriate avoidance and mitigation measures are adhered to.	Demolition works should be undertaken outside the main nesting bird season (March-September inclusive). Should this not be possible, all buildings must be inspected by an ecologist to determine the presence/absence of any nesting birds immediately prior to clearance.
Water voles	The watercourse immediately adjacent to the Site was identified as having very limited potential to support water voles.	None required, provided the appropriate avoidance and mitigation measures are adhered to.	A strict pollution prevention protocol should be adhered to during all stages of the proposed development.
Invasive Plants	One stand of Himalayan cotoneaster <i>Cotoneaster simonsii</i> was recorded within the Site.	None required providing the mitigation measures are adhered to.	Any works should be undertaken in accordance with the regulatory position statement (RPS) for invasive plant species: Treatment and disposal of invasive non-native plants: RPS 178 (Environment Agency, 2025) to ensure the removal of the non-native invasive plants does not result in further spread of the species.



2 INTRODUCTION

2.1 Instruction

- 2.1.1 PJC Consultancy Ltd was commissioned by Wokingham Borough Council to provide a preliminary ecological appraisal (PEA) which includes an ecological walkover survey, and a daytime bat walkover (DBW) survey in support of the proposed development of at Toutley Depot, Old Forest Road, Wokingham, Berkshire, RG40 5QS (hereafter referred to as the 'Site').

2.2 Survey Objectives

- 2.2.1 The aim of this PEA is to identify potential ecological constraints and opportunities associated with the Site by undertaking an ecological walkover survey, ecological desk study, and DBW. The objectives were to:
- Identify the habitat types present on the Site;
 - Identify the potential of the Site to support protected and notable habitats and/or species;
 - Identify the potential of any trees and buildings within the Site to support roosting bats;
 - Highlight known or potential legal or planning policy constraints in relation to ecology and recommend avoidance, mitigation and enhancement measures to satisfy legal and planning policy requirements where appropriate; and
 - Identify, where necessary, the requirement for further survey.

2.3 Documents and Information Provided

- 2.3.1 Development proposals are anticipated to include the demolition of existing structures and buildings, retention and recladding of existing warehouse (building B3), reconfiguration of existing yard to provide parking, external storage including three covered storage areas, fuel pump, washdown facilities and hot box, along with fencing, vehicle barrier, landscaping, access and associated works.
- 2.3.2 The following documents were used to aid the preparation of this report:
- Arboricultural Impact Assessment (Tyler Grange , 2019);
 - Ecology Report (Tyler Grange, 2019);
 - Existing Depot Layout (Drawing Number: TOU-HLM-2-00-DR-A-001010. HLM Architects, 2026);
 - Proposed Depot Layout (Drawing Number: TOU-HLM-02-00-DR-A-001001. HLM Architects, 2026);
 - Topographical Survey (Drawing Number 122/4140/1, Clifton Surveys Ltd, 2019);
 - Tree Constraints Plan (Drawing Number: PJC/7095/26/A. PJC Consultancy, 2026);
 - Tree Survey Schedule (PJC Consultancy, 2026);
 - Approximate Site boundary, as provided by Matthew Garvey (2026).

2.4 Scope of Report

- 2.4.1 This PEA is only concerned with the habitats and features within the property boundaries of the Site, or in areas that have the potential to be affected by the proposed new development.

2.5 Site Description

- 2.5.1 The Site, approximately 2.3ha in size, comprised of a commercial estate, with associated access and parking, as well as areas of amenity landscaping and tree and scrub-lined boundaries. The Site is situated parallel to the A329, at the northern outskirts of Wokingham (OS central grid reference: SU 80422 70466). To the west the Site is bordered by further commercial premises, to the south by a public



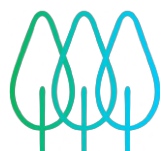
greenspace with a residential development, to the north by the A329 and to the east by the Ashridge Nature Reserve. The wider environment is characterised by the urban landscapes of Wokingham and Winnersh to the south and west, the intersection of the M4 and A329 to the north-west, and more rural landscapes including agricultural landscapes and woodland parcels beyond the A329 toward the north and east of the Site. The location of the Site within its environs is presented in Appendix I.

2.6 Legislation and Planning Policy

2.6.1 This PEA has been compiled with reference to relevant wildlife and countryside legislation, planning policy and the UK Biodiversity Framework. Their context and applicability is explained as appropriate in the relevant sections of the report and additional details are presented in Appendix II.

2.6.2 The key articles of relevance are:

- The Environment Act (2021);
- The Conservation of Habitats and Species (Amendment) Regulations 2017;
- The Wildlife and Countryside Act 1981, as amended (WCA);
- The Countryside and Rights of Way (CROW) Act 2000;
- The Natural Environment and Rural Communities (NERC) Act 2006;
- National Planning Policy Framework (NPPF) 2024 (Ministry of Housing, Communities and Local Government, 2024);
- The Protection of Badgers Act 1992;
- The UK Post-2010 Biodiversity Framework (2011-2020); and
- The Adopted Core Strategy Development Plan (Wokingham Borough Council, 2010).



3 METHODOLOGY

3.1 Desk Study

- 3.1.1 A desk study was undertaken in February 2026 with the objective of collating and reviewing existing ecological information, and obtaining data and information held by relevant third parties.
- 3.1.2 In addition, datasets from Natural England (MAGIC, 2026) were reviewed to identify the presence of UK statutory designated sites and notable habitats within the zone of influence, including woodlands listed on the ancient woodland inventory, habitats of principal importance (HPI) listed on the priority habitat inventory and statutory designated sites for their nature conservation value at the national scale such as sites of scientific interest (SSSI) and at the European and/or international scale namely: special areas of conservation (SACs), special protection areas (SPAs), and internationally designated wetland (Ramsar) sites. These sites collectively are hereafter referred to as 'European Sites'. Where measurements are included with the record, these provide the distance of the designated site from the closest point of the Site. Furthermore, Google Earth aerial imagery was reviewed to assess habitats within the Site and wider environment.
- 3.1.3 Data for sites within the zone of influence where European Protected Species Mitigation (EPSM) licences have been granted, were also reviewed. This information allows a greater understanding of the potential for European protected species to be present in the local area.
- 3.1.4 The zone of influence is the area over which ecological features, such as designated sites of nature conservation importance and protected and notable habitats and species, may be affected by the biophysical changes caused by the proposed development and associated activities. Due to the size of the Site and nature of the proposed development it is considered that a zone of 1km from the centre of the Site is appropriate for the gathering of information for the desk study (CIEEM, 2018).

3.2 Ecological Walkover Survey

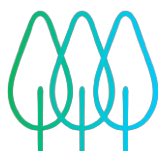
- 3.2.1 An ecological walkover survey (formerly referred to as 'extended phase 1 habitat survey') was undertaken on the 18th February 2026 by Isabel Howind Rodriguez BSc(Hons) MSc. As part of the ecological walkover survey, habitats were identified and mapped in accordance with 'UK Habitat Classification 2.0' (UKHab Ltd, 2023) (Appendix III).
- 3.2.2 UK Habitat Classification 2.0 comprises a five-level 'Primary Habitat Hierarchy' and a list of 'Secondary Codes', the latter is sub-divided into Essential and Additional Codes. For the purpose of this assessment, habitats have been allocated a single Primary Habitat Code up to Level 4 as well as all associated Essential Secondary Codes, and where relevant Additional Secondary Codes.
- 3.2.3 The ecological walkover survey was extended to include consideration of protected and notable species in accordance with good practice guidance for preliminary ecological appraisal (CIEEM, 2017). The dominant plant species in each habitat were recorded, as were any evidence of protected and notable species. The potential for the Site to support protected and notable species was also assessed. Those ecological features not classified as a habitat are denoted using a target note.

3.3 Daytime Bat Walkover Survey

- 3.3.1 All buildings and trees within the Site were also subject to a DBW. The external and internal inspection of the buildings and ground inspection of trees was to assess potential roosting features (PRFs) such as those presented in Tables 1 and 2 below. The DBW was undertaken in accordance with best practice survey standards (BCT, 2023 and BTHK, 2018).

Table 1: Features of trees commonly used by bats.

Features of trees used as bat roosts	Signs indicating possible use by bats
Natural holes.	Tiny scratches around entry point.



Woodpecker holes.	Staining around entry point.
Cracks/splits in major limbs.	Bat droppings in, around or below entrance.
Loose bark.	Audible squeaking at dusk or in warm weather.
Hollows/cavities.	Flies around entry point.
Dense epicormic growth (bats may roost within it).	Distinctive smell of bats.
Bird and bat boxes.	Smoothing of surfaces around cavity.

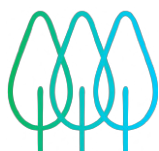
Table 2: Features of buildings commonly used by bats.

Features of building or built structure	Signs indicating possible use by bats
Type of building.	Tiny scratches around entry point.
Age of building.	Staining around entry point.
Aspect of PRF.	Bat droppings in, around or below entry point.
Wall construction – cavity walls or rubble-filled walls.	Feeding remains below entry point.
Form of the roof – presence of gable ends, hipped roofs, nature and condition of the roof covering.	Cobweb free potential entry points.
Presence of hanging tiles, weather boarding or other forms of cladding.	Audible squeaking at dusk or in warm weather.
Nature of the eaves – sealed by a soffit or boxed eave and tightness of fit to exterior walls.	Flies around entry point.
Presence and condition of lead flashing.	Distinctive smell of bats.
Gaps under eaves, around windows, under tiles, lead flashing.	Smoothing of surfaces around entry point.
Presence and type of roof lining.	
Presence on roof insulation.	

- 3.3.2 The buildings and trees were assessed in accordance with the criteria listed above and assigned to one of five categories as listed in Table 3 or Table 4 below.

Table 3: Categorisation system for visual inspection of trees.

Suitability	Description
None/negligible	A tree with no features capable of supporting roosting bats or highly unlikely to be any present.
FAR	Further assessment required to establish if any PRFs are present in the tree.
PRF	A tree with at least one PRF present.



PRF-I	Features considered suitable to support individual bats or very small numbers of bats either due to size or lack of suitable surrounding habitats.
PRF-M	Features considered suitable to support multiple bats and may therefore be used by a maternity colony.

Table 4: Categorisation system for visual inspection of structures.

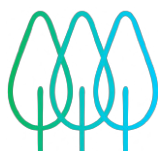
Category	Description
Confirmed roost	Bats discovered roosting within structure or recorded emerging from/entering structure at dusk and/or dawn. Structure found to contain conclusive evidence of occupation by bats, such as bat droppings. A confirmed record (as supplied by an established source such as the local bat group) would also apply to this category.
High suitability	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.
Moderate suitability	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status.
Low suitability	A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats.
Negligible suitability	A structure with no features capable of supporting roosting bats.

3.4 Limitations of Survey

- 3.4.1 The protected species assessment provides a preliminary view of the likelihood of protected species occurring on Site, based on the suitability of the habitat and any direct evidence on Site. It should not be taken as providing a full and definitive survey of any protected species group. Additional surveys may be recommended if, on the basis of this assessment it is considered reasonably likely that protected species may be present.
- 3.4.2 The habitats present, and their management are likely to change over time, thus the findings of the ecological walkover survey are only considered valid for a period of up to two years.
- 3.4.3 A full biological record centre desktop study was not undertaken as part of this assessment. This was not considered necessary given the limited scale of the proposed development, the nature of the on-site and surrounding habitats and limited potential for impacts to arise within or outside of the Site.



- 3.4.4 The ecological walkover survey was conducted at a sub-optimal time of year i.e. out of the peak growing/flowering season for most British plants. However, plant identification was undertaken using vegetative survey techniques and was sufficient to determine the broad habitat types as required in an ecological walkover survey.
- 3.4.5 Full access to the roof void of the annex connecting buildings B1, B2 and B3 was not possible due to health and safety considerations and thus a thorough assessment of the annex roof void could not be undertaken. The section was closed due to asbestos related issues, and as such safe access was not permitted. As a result, a precautionary approach to surveying for bats and subsequent mitigation has been adopted to account for the restricted assessment.
- 3.4.6 This report includes a preliminary assessment of likely impacts of a development project only. The primary audience for a PEA is the client or developer and relevant members of the project team, such as the architect, planning consultant, and landscape architect. It is normally produced to inform a developer (or other client), and their design team, about the key ecological constraints and opportunities associated with a project, possible mitigation requirements and any detailed further surveys required. Under normal circumstances, it is not considered appropriate to submit a PEA in support of a planning application because the scope of a PEA is unlikely to fully meet planning authority requirements in respect of biodiversity policy and implications for protected species. In most cases, particularly when further surveys have been recommended within the PEA, a more detailed and comprehensive Ecological Impact Assessment (EclA) should be submitted in support of a planning application instead.
- 3.4.7 This document has been prepared for the stated proposal (2.3.1) and should not be relied upon or used for any other project without an additional check being carried out by the author as to its suitability in relation to any updated proposals. PJC Consultancy accepts no responsibility or liability for the consequence of this document being used for a purpose other than the purposes for which it was commissioned. PJC Consultancy accepts no responsibility or liability for this document to any party other than the person by whom it was commissioned.



4 RESULTS

4.1 Desk Study

Statutory Designated Sites

- 4.1.1 One statutory designated site of nature conservation importance was identified within the zone of influence as part of the desk study. This was Holt Copse and Joel Park Local Nature Reserve, situated approximately 820m south of the Site. Holt Copse and Joel Park Local Nature Reserve is primarily designated for its lowland mixed deciduous woodland with ancient semi-natural woodland, which includes a large common noctule *Nyctalus noctula* roost.

Non-Statutory Designated Sites

- 4.1.2 Overall, three non-statutory designated sites of nature conservation importance were identified within the zone of influence as part of the desk study. These are summarised in Table 5 below.

Table 5: Non-statutory designated sites within the zone of influence.

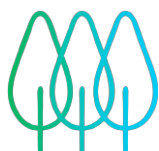
Site Name	Designation	Distance and aspect from Site	Description/reasons for designation
Cantley Park	Local Wildlife Site (LWS)	745m SE	Parkland with mature trees.
Holt Copse	LWS	920m S	Semi-natural ancient woodland
Furze Covert	LWS	870m N (of proposed vehicle barrier)	Large block of broadly classified deciduous woodland.

Protected and Notable Habitats

- 4.1.3 Five parcels of ancient woodland listed on the ancient woodland inventory were identified within the zone of influence as part of the desk study, the nearest being approximately 750m south-west of the Site from the proposed vehicle barrier and approximately 920m west from the main Site.
- 4.1.4 Multiple parcels of HPI listed on the priority habitat inventory were identified within the zone of influence as part of the desk study. These habitats included broadly classified deciduous woodland, a parcel of wood pasture and a priority pond. The closest parcel of HPI was an area of broadly classified deciduous woodland located immediately adjacent to the northern Site boundary.

Protected and Notable Species

- 4.1.5 In total, eight EPSM licences previously granted by Natural England pertaining to protected species were identified within the zone of influence as part of the desk study. These included:
- One license for the damage and destruction of a common pipistrelle resting place between July 2016 and July 2021, located approximately 280m south of the Site;
 - Two licenses for the damage and destruction of a GCN resting place between August 2020 and December 2039, located approximately 660m south-east of the Site;
 - One license for the damage and destruction of a GCN resting place between September 2020 and December 2039, located approximately 660m south-east of the Site;



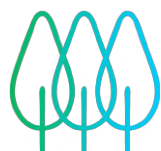
- One license for the damage and destruction of a brown long-eared bat, common pipistrelle and soprano pipistrelle resting place, between September 2020 and December 2027, located approximately 660m south-east of the Site;
- One license for the damage and destruction of a noctule resting and breeding place between March 2010 and July 2011, located approximately 908m south of the Site;
- One license for the damage and destruction of a GCN resting place between August 2019 and December 2025, located approximately 990m south-west of the Site; and
- One license for the damage and destruction of a GCN resting place between February 2020 and December 2025, located approximately 990m south-west of the Site.

4.2 Ecological Walkover Survey

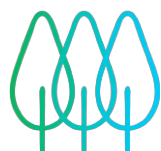
4.2.1 Habitat types and descriptions and associated primary and secondary codes are provided in Table 6 below in accordance with UK Habitat Classification 2.0. The distribution of these habitats are presented in Appendix III, together with Site photographs, which are presented in Appendix IV.

Table 6: Habitat types present within the Site.

Habitat Type				Description
Level 2	Level 3	Level 4	Secondary Codes	
Grassland (g)	Neutral grassland (g3)	Other neutral grassland (g3c)	Scattered trees (32); Frequently mown (108)	Small sections of grass were present by the western boundary, separated from the adjacent road and access by a curb on all sides. All three parcels extended beyond the Site boundaries, where some trees were present. Some featured disturbed or bare ground. The vegetation within the parcels was predominantly comprised of grasses, such as false oat <i>Arrhenatherum elatius</i> , cock's-foot <i>Dactylis glomerata</i> and meadow grass <i>Poa</i> sp., along with a variety of other species, which in some areas exceeded 9 species/ m ² . The species within these parcels included, amongst others: Corn spurrey <i>Spergula arvensis</i> , oxford groundsel <i>Senecio squalidus</i> , cow parsley <i>Anthriscus sylvestris</i> , cleavers <i>Galium aparine</i> , cuckoo pint <i>Arum maculatum</i> , milk thistle <i>Silybum marianum</i> , common chickweed <i>Stellaria media</i> , yarrow <i>Achillea millefolium</i> , shepherd's purse <i>Capsella bursa-pastoris</i> and common daisy <i>Bellis perennis</i> . The northernmost parcel also included a large stand of cherry laurel <i>Prunus laurocerasus</i> .
Heathland and shrub (h)	Dense scrub (h2)	Bramble scrub (h3d)	Scattered trees (32); Invasive non-native species (524)	Sections of bramble scrub were recorded, primarily by the north-western Site boundary, on the slope between existing vehicle access and buildings B1 and B2. Two ash trees <i>Fraxinus excelsior</i> were found within this parcel. Some



			additional species were present indicating prior ornamental planting, such as, for example, daffodils <i>Narcissus</i> sp., Portuguese laurel <i>Prunus lusitanica</i> and Himalayan cotoneaster <i>Cotoneaster simonsii</i> .
Urban (u)	Mixed scrub (h3h)	Native species (522); Introduced shrub (847)	Mixed scrub was present along the northern and eastern boundaries and extended beyond the Site boundaries. Along the northern boundary this formed part of a woodland edge to the parcel adjacent to the Site. Along the eastern boundary, the scrub was present on top of the earth bank, though notably less dense on the side facing the Site. Within the Site, the scrub was comprised predominantly of bramble and hawthorn. Additional species within included snowberry <i>Symphoricarpos albus</i> , late cotoneaster <i>Cotoneaster coriaceus</i> , butterfly bush <i>Buddleia davidii</i> , gorse <i>Ulex europaeus</i> , dog rose <i>Rosa canina</i> , blackthorn <i>Prunus spinosa</i> and some bracken <i>Pteridium aquilinum</i> , in addition to some scattered species present in the nearby grass parcels.
	Developed land; sealed surface (u1b)	Ruderal ephemeral (81); Vacant or derelict land (82); Active Management (516); Commercial building (815); Commercial premises open space (819)	The Site comprised predominantly of hardstanding and several buildings (see table 7 for descriptions). Some ruderal vegetation was present, particularly near the Site boundary, comprised of the species present in the adjacent grass parcels and scrub.
	Sparsely vegetated urban land (u1f)	Ruderal ephemeral (81); Vacant or derelict land (82); Commercial premises open space (819)	Some parcels with sparse vegetation on previously sealed surfaces were present on the south-eastern extent of the Site. These comprised of vegetation on substrate accumulated on top of hardstanding, as well as disused material piles. The species found were consistent with those found in the grass parcels in the western extent and adjacent scrub, though with limited species diversity, and primarily dominated by grasses, cow



parsley and some common nettle *Urtica dioica*.

4.3 Daytime Bat Walkover Survey

- 4.3.1 A description of the buildings and trees and any potential roosting features (PRF) are detailed in Tables 7 and 8 below. The buildings are labelled as in the previous ecology report (Tyler Grange, 2019) and the trees in accordance with the tree constraints plan and tree survey schedule (both PJC Consultancy, 2026):

Table 7: DWB results of buildings within the Site.

B1

External Description

Single-story office building, located on the western Site extent, between building B2 and B3. The building was constructed from yellow brick, and featured a low-pitched roof, with a pyramidal skylight. A number of windows and glass doors in metal frames were present on the western and northern elevation, all in overall good condition. A composite soffit was present on all visible elevations. Some damage was present in the soffit on the western elevation, creating a large opening. UPVC guttering was mounted on the soffit. Floodlights were present on all elevations.

Internal Description

The interior was not accessed, but partially visible through the windows, and featured a suspended ceiling. Due to asbestos presence and resulting health and safety concerns, a section of the interior roof cavity was not accessible.

Evidence of Bats

None recorded at the time of the assessment.

Potential Roost Features

Broken soffit, access to interior spaces and roof cavity.

Suitability to Support Roosting Bats

Low.

B2

External Description

Multi-purpose building, with warehouse, storage and offices. Constructed from yellow brick on the northern and part of the eastern and southern elevation, in addition to corrugated metal. Part of the north-eastern extent featured wood-slats as walls, providing significant air and light ingress. The roof was constructed from corrugated composite material and featured skylights throughout.



Floodlights were present on all elevations. There was damage to the soffit on the northern and eastern elevation. A brick was noted missing on the eastern elevation. The annex linking buildings B1, B2 and B3, for the purposes of the assessment was considered part of building B2. Damage to the soffit was noted on the eastern elevation, providing access into the soffit interior.

Internal Description

Some damage was present within the annex adjacent to the south of building B2, where an interior ceiling tile was broken. One of the doors on this elevation did not fully close and potentially provided access to the interior, and therefore the interior roof cavity. Another door on this elevation was found to also provided potential access to the building interior, along with vent shutters leading to a utility room.

The accessed interior spaces were all subject to frequent disturbance from use, strong light ingress from windows, glass doors and skylights. Some spaces were additionally subject to strong air ingress. The soffit of the annex was noted to be damaged in several locations, most superficial, apart from a large broken section on the eastern elevation.

Evidence of Bats

None recorded at the time of the assessment.

Potential Roost Features

Broken interior ceiling with access, damaged soffit, damaged or missing bricks, open vent holes and vent shutters.

Suitability to Support Roosting Bats

Low

B3

External Description

Warehouse constructed from yellow brick and corrugated metal. The building featured yellow brick walls up to approximately 5m height, these were partially covered by corrugated metal, as was the pitched roof. The vehicle doors were folding metal doors, or shuttered, the additional pedestrian doors were constructed from uPVC in uPVC frames. Some gaps were noted in the brickwork, particularly around the doors, in addition to a shifted brick. No windows were present. Floodlights were present on all elevations.

Internal Description

The interior did not feature insulation, and was subject to strong air and light ingress. The vehicle doors did not provide a good seal and access to the interior was present in multiple areas. The interior ledges featured evidence of birds (likely feral pigeons). One interior section, likely used for office or storage space, was boarded shut, and not accessible, however the board was loose and potentially provided access into the space behind.



Evidence of Bats

None recorded at the time of the assessment.

Potential Roost Features

Gaps in the brickwork, shifted brick, interior boarding.

Suitability to Support Roosting Bats

Low.

B4

External Description

Single-storey office building. The building was comprised of several rendered and painted portacabin modules and featured a flat roof. The building was overall in poor condition, with extensive damage to the timber particle baseboard on the northern, eastern and southern elevation. The timber fascia board featured extensive superficial damage with some, especially on the western elevation, potentially providing sufficient depth for a roosting bat.

Several windows were boarded; however, one lacked a seal beneath. An access point for cables on the northern elevation was not well-sealed and provided potential access to the wall cavity or interior space. Floodlights were present on all elevations.

Internal Description

The interior was visible through the windows, and appeared to be finished, without roof cavity.

Evidence of Bats

None recorded at the time of the assessment.

Potential Roost Features

Gaps under boarding, damaged fascia, gaps at cable access point.

Suitability to Support Roosting Bats

Low.

B5, B6 and B7

External Description



All three buildings were used for storage and featured floodlights on all elevations. Building B5 was constructed from yellow brick and breezeblock, up to approximately 1m height, the rest of the walls and roof were corrugated metal, supported by steel beams. The western elevation along the whole length featured wire mesh doors.

Building B6 was an open-sided salt-store, constructed from metal beams and a slanted, corrugated metal roof. Concrete panels of approximately 2.5m height were used to contain the material, all of which appeared to be in good condition.

Building B7 was a single-storey building constructed from corrugated metal on a yellow brick base, that reached up to approximately 75cm height. The roof featured multiple skylights, and further air and light ingress was noted through the folding vehicle access doors.

Internal Description

The interior of all buildings was subject to strong air and light ingress, and featured no insulation. During the visit, a group of feral pigeons was observed in the interior of building B5.

Evidence of Bats

None recorded at the time of the assessment.

Potential Roost Features

None recorded at the time of the assessment.

Suitability to Support Roosting Bats

Negligible.

Table 8: DWB results of trees within or immediately adjacent the Site. All trees have been labelled in accordance with the Tree Survey Schedule (PJC Consultancy, 2026) and Tree Constraints Plan (PJC Consultancy, 2026).

All trees within the Site

Description

All trees within the Site (trees T10, T11, T12 and group 13) were ash and goat willow. All were between 4 and 12m in height and intact, with small stem diameters.

Evidence of Bats

None recorded at the time of the assessment.

Potential Roost Features

None recorded at the time of the assessment.



Suitability to Support Roosting Bats

None.

Trees adjacent to the Site

Description

Trees T6, T8, T14, T15 and T21 were located immediately adjacent to the Site on the western and southern Site boundary, with T21 partially overhanging the Site.

Tree T6 was a multi-stemmed crack willow located adjacent to the western Site boundary, of approximately 18m height. Tree T8 was a field maple of approximately 11m height, located next to tree T6 near the western Site boundary. Trees T14 and T15, a pedunculate oak of approximately 15m height and a crack willow of approximately 7m height, were located at the south-western boundary of the Site. Tree T21, a crack willow of approximately 11m height, was located at the southern Site boundary, leaning over the stream.

Evidence of Bats

None recorded at the time of the assessment.

Potential Roost Features

T6: Weld, compression fork, lifted bark.

T8: Wound, pruning cuts, ivy.

T14: Knot holes, desiccation fissures, lifted bark.

T15: Lifted bark, tear-outs.

T21: Knot holes, compression forks, transverse snap, lifting bark.

Suitability to Support Roosting Bats

PRF



5 DISCUSSION AND RECOMMENDATIONS

5.1 Statutory Designated Sites

- 5.1.1 Overall, one statutory designated site of nature conservation importance was identified within the zone of influence as part of the desk study. This was Holt Copse and Joel Park Local Nature Reserve, situated approximately 820m south of the Site.
- 5.1.2 However, given the distance between the Site and the identified statutory designated site, and the size of the Site and nature of the proposed development, adverse effects upon the statutory designated site and its qualifying criteria for designation are considered highly unlikely. Statutory designated sites are therefore not considered an ecological constraint and are not considered further in this report.

5.2 Non-Statutory Designated Sites

- 5.2.1 Overall, three non-statutory designated sites of nature conservation importance were identified within the zone of influence as part of the desk study. These were Cantley Park LWS, Holt Copse LWS and Furze Covert LWS. The nearest was Cantley Park LWS, located approximately 745m south-east of the Site.
- 5.2.2 However, given the distance between the Site and the identified non-statutory designated sites, and the size of the Site and nature of the proposed development, adverse effects upon the non-statutory designated sites and their qualifying criteria for designation are considered highly unlikely. Non-statutory designated sites are therefore not considered an ecological constraint and are not considered further in this report.

5.3 Protected and Notable Habitats

Woodland

- 5.3.1 Multiple parcels of ancient woodland and HPI were identified within the zone of influence as part of the desk study, the nearest being a parcel of broadly classified deciduous woodland located immediately adjacent to the northern Site boundary.
- 5.3.2 No works are proposed in the immediate vicinity of the adjacent woodland, as it borders an existing access road within the Site and given the sloped topography of the Site, direct and indirect impacts on HPI woodland are considered very unlikely.
- 5.3.3 Given the distance between the Site and the nearest parcel of ancient woodland and HPI and given the size of the Site and nature of the proposed development, adverse effects upon these protected and notable habitats are not considered likely. Protected and notable habitats are therefore not considered an ecological constraint and are not considered further in this report.

5.4 Protected and Notable Species

- 5.4.1 The Site was considered to provide opportunities for protected and notable species. The suitability of habitat on Site to support species is considered below.

Bats

All bats are European protected species (EPS) and both individual animals and their roosts are afforded protection under the Conservation of Habitats and Species Regulations 2019 (as amended) and the Wildlife and Countryside Act, 1981 (as amended). Certain bat species are also listed as Species of Principal Importance (SPI) under the NERC Act 2006.

Roosting Suitability

- 5.4.2 As part of the DBW, buildings B1, B2, B3 and B4 were identified as exhibiting features i.e. lifted, damaged or missing brickwork or damaged soffits, with potential to support roosting bats.



- 5.4.3 On this basis, buildings B1, B2, B3 and B4 were identified as having low suitability to support roosting bats during the summer. It is therefore recommended that a single dusk emergence survey be undertaken between May and August inclusive.
- 5.4.4 As part of the DBW, no trees within the Site were identified to have suitability for roosting bats. However, several trees immediately adjacent to the Site, trees T6, T8, T4, T15 and T21, were identified as exhibiting features with potential to support roosting bats. All were identified as having PRF suitability to support roosting bats.
- 5.4.5 It should be noted that the DBW was undertaken from the ground and therefore it was not possible to accurately determine the characteristics of the feature, for example the depth of the feature within the tree. The above classification therefore follows a precautionary approach using professional judgement.
- 5.4.6 Given that the identified trees are off-site and to be fully retained under the current proposals, direct impacts on roosting bats are considered very unlikely. Further surveys are therefore not considered necessary or appropriate on this occasion, provided the mitigation measures outlined below are adhered to, to prevent indirect impacts on nearby roosting bats as a result of the proposed developments.
- 5.4.7 Furthermore, it is recommended that any new artificial lighting associated with the proposed development aims to:
- Maintain a dark corridor along all Site boundaries in particular, ensure the HPI woodland and adjacent trees with PRF remain dark;
 - Use minimum light levels necessary. For example, there should be times throughout the evening when all outdoor security lights are unlit to avoid affecting bat and other nocturnal species activity. Lighting can also be installed using a timer or movement sensor to avoid long periods of an area being lit at night;
 - Lighting should be a warm white spectrum and feature peak wavelengths higher than 550nm to lower the range of species affected by lighting. Using LED luminaires where possible and avoid luminaires with UV elements, specifically avoiding metal halide and fluorescent sources (Institute of Lighting Professionals, 2018); and
 - Internal luminaires can be recessed where installed in proximity to windows to reduce glare (Institute of Lighting Professionals, 2018) and light spill and use hoods, louvres or other similar design features to avoid light spill and direct light away from areas of mature vegetation.

Foraging and Commuting Suitability

- 5.4.8 The Site was considered to provide suitable commuting and foraging habitat for bats primarily along the hedgerows and scattered trees, and overall was classified as having low suitability to support foraging and commuting bats.
- 5.4.9 However, these features are not considered to function as an important corridor for bats given the large network of connected woodland immediately adjacent the Site and within the wider landscape that also provides plentiful foraging and commuting opportunities for bats. On this basis, the proposed development is considered unlikely to result in the loss or degradation of bat foraging and commuting habitat or sever important commuting routes and obstruct access between potential bat roosts and important foraging habitats, providing the mitigation measures in relation to lighting described in paragraph 5.4.7 above are adhered to.

Hazel Dormice

- 5.4.10 Hazel dormice *Muscardinus avellanarius* are EPS and are afforded protection under the Conservation of Habitats and Species Regulations 2019 (as amended) and the Wildlife and Countryside Act, 1981 (as amended). Dormice are also listed as SPI under the NERC Act 2006.



- 5.4.11 The Site supported some suitable semi-natural habitat for dormice comprising mixed scrub, predominantly present along the northern and eastern Site boundaries. Some connectivity was present to adjacent woodland parcels and hedgerows in the immediate surroundings of the Site.
- 5.4.12 However, the suitability for dormice was limited, given that the majority of the Site comprised of hardstanding and buildings, and the absence of preferred floral species (such as hazel *Corylus avellana* and honeysuckle *Lonicera periclymenum*). Additionally, the Site was subject to frequent disturbance in the form of noise, light and vibration and due to the current use of the Site, high levels of passing traffic. Therefore, the Site provided sub-optimal foraging, commuting, nest building and hibernating opportunities for dormice.
- 5.4.13 While no works are proposed on the eastern extent of the Site, a small amount of scrub near the northern boundary may be affected by the current proposals. Given the limited suitability of the Site, no further surveys for dormice are considered necessary on this occasion.
- 5.4.14 Nevertheless, in the unlikely event that dormice are present within the Site and wider surroundings, the proposed development could result in the death or injury, or disturbance to dormice or could result in the damage or destruction of a dormouse breeding site or resting place.
- 5.4.15 Therefore, as a precaution, it is recommended that habitat clearance works be undertaken in accordance with a strict precautionary non-licensed method statement (Appendix VI).
- 5.4.16 It is also recommended that a lighting mitigation strategy (see paragraph 5.4.7) be implemented throughout all phases of the proposed development to avoid degradation of retained habitats.
- 5.4.17 This is further supported by guidance detailed by Natural England. For European protected species (such as dormice) Natural England's stance is that: "If the consultant ecologist, on the basis of survey information and specialist knowledge or the species concerned, considers that on balance the proposed activity is reasonably unlikely to result in an offence under Regulation 41 or 45 then no licence is required" (Natural England, 2013).
- 5.4.18 In the highly unlikely event that dormice, or evidence of dormice are found, all work must stop, and advice sought from a suitably qualified ecologist.

Great Crested Newts and other Amphibians

- 5.4.19 Great crested newts (GCN) *Triturus cristatus* are EPS and are afforded protection under the Conservation of Habitats and Species Regulations 2019 (as amended) and the Wildlife and Countryside Act, 1981 (as amended). GCN and common toad *Bufo bufo* are also listed as SPI under the NERC Act 2006.
- 5.4.20 Overall, ten waterbodies were identified within a 250m radius of the Site as part of the desk study. These comprised four watercourses in the form of streams, drains and ditches, and six ponds. The nearest was a watercourse WB1, adjacent to the southern and eastern Site boundary.
- 5.4.21 Five of the identified waterbodies, WB5, WB6, WB8, WB9 and WB10 were separated from the Site by the A329 carriageway, which due to its size and high levels of traffic presents a significant obstacle to GCN dispersal.
- 5.4.22 The waterbodies WB2, WB3 and WB4 were located between the Site and a residential development to the south. The waterbodies were surrounded by grassland, scrub and lines of trees, which connected to habitat at the Site boundaries and provided suitable terrestrial habitat for GCN commuting, foraging and hibernating. The nearest waterbody was waterbody WB2, located approximately 50m south of the Site. Waterbody WB7 was located approximately 170m south-west of the proposed vehicle access and 300m west of the main Site. Waterbody WB7 was separated from the Site by Toutley Road, however, traffic levels are likely to vary and may not present a definitive obstacle to GCN dispersal. However, more suitable habitat is present in the immediate surroundings of waterbody WB7 and north-west of it, in the form of further waterbodies, grassland, scrub and treelines present at the public green space Old Forest Meadows.



- 5.4.23 Habitats recorded within the Site, particularly bramble and mixed scrub, grassland and vacant land with ruderal vegetation, were considered to provide some limited foraging, commuting, sheltering opportunities for GCN.
- 5.4.24 Direct impacts on suitable waterbodies for breeding GCN are not anticipated. However, the proposed development could result in adverse direct and indirect impacts on GCN, resulting in the death or injury, or disturbance to GCN during their terrestrial phase or result in the damage or destruction of a GCN resting place, such as a hibernation site.
- 5.4.25 This is however considered very unlikely due to the limited extent of suitable habitat available on Site, which is largely limited to the Site boundaries, and additionally, due to the limited extent of vegetation clearance required to facilitate the proposed development.
- 5.4.26 Therefore, as a precaution, it is recommended that construction works (including habitat clearance works affecting grassland or scrub parcels) be undertaken in accordance with a Precautionary Non-Licensed Method Statement (see Appendix VI).
- 5.4.27 The purpose of the Precautionary Non-Licensed Method Statement is to detail all reasonable avoidance and mitigation measures to be implemented to ensure that there are no detrimental impacts on the favourable conservation status of GCN and no risk to individual GCN potentially present within the Site as a result of construction activities.
- 5.4.28 Avoidance and mitigation measures detailed within the Precautionary Non-Licensed Method Statement include but are not limited to the following:
- Ensuring that habitat clearance and building demolition works are undertaken during the spring/summer season (April to mid-June) when GCN enter into/are around aquatic habitat to breed, and outside the hibernation period (avoiding November to February, inclusive).
 - Ensuring that habitat clearance and building demolition works are undertaken under the direction and supervision of a suitably qualified and licensed ecologist.
- 5.4.29 Providing the avoidance and mitigation measures detailed within the Precautionary Non-Licensed Method Statement are implemented in full, the proposed works are considered highly unlikely to adversely affect the favourable conservation status of GCN, or breach relevant nature conservation legislation pertaining to GCN. On this basis, further GCN presence/likely absence surveys and/or a EPSL is not required prior to proposed works commencing.
- 5.4.30 This is supported by the rapid risk assessment tool within the GCN licence application form (WML-A14-2), which was used to assess the risk of the proposed development on GCN. Based on the current proposal that comprises approximately 0.02ha of suitable terrestrial habitat loss within 250m of the nearest potential GCN breeding waterbody WB2 to the south of the Site, the tool indicates a 'green' risk meaning the risk of an offence being committed is considered to be highly unlikely and that a European Protected Species (EPS) licence is not required.

Reptiles

- 5.4.31 Native, widespread reptile species (common or viviparous lizard *Zootoca vivipara*, adder *Vipera berus*, grass snake *Natrix helvetica* and slow worm *Anguis fragilis*) are protected under Schedule 5 of The Wildlife and Countryside Act 1981 (as amended), making it an offence to kill or injure individual animals. All widespread reptile species are also listed as SPI under the NERC Act 2006.
- 5.4.32 Habitats recorded within the Site, particularly bramble and mixed scrub, grassland and vacant land with ruderal vegetation, were considered to provide some limited foraging, commuting, sheltering and basking opportunities for reptiles. On this basis and given the size of the Site and the limited extent of suitable habitat, the Site would only be considered suitable for a small number of common and widespread reptile species such as slow worms.
- 5.4.33 The suitable habitats within the Site were largely limited to the Site boundaries and not optimal for reptiles, as they were subject to frequent disturbance from the current use of the Site, in the form of



noise, dust, and vibration. Furthermore, the vegetation clearance required to facilitate the proposed development affects a limited amount of the present habitat.

- 5.4.34 However, though considered unlikely, works associated with any proposed development of the Site, for example habitat clearance, could therefore result in the death or injury of any reptiles present within the Site. Therefore, in order to comply with legislation protecting reptiles, the mitigation measures detailed below should be adhered to.
- 5.4.35 As a precaution, it is therefore recommended that construction works (including habitat clearance works) be undertaken in accordance with a Precautionary Non-licensed Method Statement (see Appendix VI).
- 5.4.36 Providing the avoidance and mitigation measures detailed within the Precautionary Non-licensed Method Statement are implemented in full, the proposed works are considered highly unlikely to result in the death or injury of any reptiles potentially present within the Site. On this basis, further reptile presence/likely absence surveys are not required prior to proposed works commencing.
- 5.4.37 It is also recommended that prior to the commencement of works, the grassland within the Site is maintained at a short sward to prevent the habitat becoming more suitable for reptiles.

Birds

- 5.4.38 All birds, their nests and eggs are protected from killing and injury of individuals, damage and destruction of nests and destruction of eggs under the Wildlife and Countryside Act 1981 (as amended). Species listed in Schedule 1 (Part 1) of the Act are also protected from disturbance whilst nesting or whilst with dependent young, by special penalties. Many bird species are also listed as SPI under the NERC Act 2006.
- 5.4.39 The Site supported hedgerows and scattered trees, which were considered to provide good nesting and foraging opportunities to a wide range of common bird species.
- 5.4.40 Works associated with any proposed development of the Site, for example habitat clearance, could therefore result in direct adverse impacts on nesting birds. On this basis, nesting birds are therefore considered a potential ecological constraint. In order to comply with legislation protecting nesting birds the mitigation measures detailed below should be adhered to.
- 5.4.41 It is recommended that habitat clearance works be undertaken outside the main nesting bird season. The nesting bird season for most British bird species is between March and August (inclusive).
- 5.4.42 Should this not be possible, all suitable nesting habitat, including buildings, must be inspected by an ecologist to determine the presence/absence of any nesting birds prior to clearance. In the event of an active nest being identified, a temporary exclusion zone would need to be placed around the nest and development paused until the dependent young have fledged which may be several weeks. The ecologist will determine safe working distances and the distances will be dependent upon the bird species present.
- 5.4.43 Please note that as feral pigeons *Columba livia domestica* nest all year round, the destruction of their nests may not be avoidable. Where applicable, a licence to remove an active nest for health and safety purposes may be obtained from Natural England subject to conditions.
- 5.4.44 The permanent loss of suitable foraging and nesting habitat for birds should be compensated for by incorporating new suitable foraging and nesting habitat into the landscape designs. Habitat creation examples including planting a variety of native fruit and nut bearing tree and shrub species such as birch *Betula* spp., holly *Ilex aquifolium*, rowan *Sorbus aucuparia*, elder *Sambucus nigra* and crab apple *Malus sylvestris*.
- 5.4.45 Artificial bird nest boxes should also be installed onto any retained trees and new buildings within the Site. Given their designation as SPI, particular consideration should be given to the installation of starling *Sturnus vulgaris* (i.e. Schwegler 3S or similar) nest boxes and/or general bird nest boxes used



by house sparrow *Passer domesticus* and spotted flycatcher *Muscicapa striata* (i.e. Schwegler 1B, 2HW, 2GR or similar).

Badgers

- 5.4.46 Badgers *Meles meles* and their setts are protected under The Badger Act (1992).
- 5.4.47 No evidence of badger field signs (for example hairs, latrines, dung pits, snuffle holes, mammal paths or scratching posts) or setts were recorded within the Site and within 30m of the Site boundaries during the survey, where access and visibility permitted assessment. Assessment along part of the north-eastern boundary, and other side of the earth bank along the eastern boundary was not possible due to lack of safe access and dense scrub cover. Some mammal paths were visible on the earth bank, however, the proximity of paw prints and feeding remnants indicate these were used by red foxes, rather than badgers.
- 5.4.48 Habitats throughout the Site were considered to provide very limited sett building and foraging and commuting opportunities for badgers given the hard underlying substrate featuring for the majority of the Site, and the proximity to the A329 with a high volume of traffic, limiting connectivity to suitable habitat. Additionally, due to the Site's use, the Site and immediate surroundings were subject to frequent and consistent disturbance from use, in the form of noise, light and vibration. The eastern Site boundary consisted of a steep earth bank with some scrub and tree cover, however, the presence of a small watercourse (waterbody WB1) at the base for most of its length made this less suitable for badgers.
- 5.4.49 On this basis, the proposed development is considered highly unlikely to result in the damage or destruction of a sett, or obstructing access to a sett, and disturbance to a badger whilst it is occupying a sett.
- 5.4.50 As a precautionary approach however, due to the limitations of the assessment and due to the mobile nature of the species with its ability to quickly establish new setts, it is recommended that a pre-works survey be undertaken immediately prior to the proposed development becoming operational to ensure no new setts have become established, particularly along the eastern boundary.
- 5.4.51 During construction works, all excavations should be excavated individually and back filled immediately after where possible. Where this is not possible excavations must be covered to prevent badgers (or other animals) becoming trapped within the excavation. If this is not possible, one or both sides of the excavation must be sloped in order to allow egress from the excavation.
- 5.4.52 In addition, all chemicals onsite should be stored correctly and be made inaccessible to badgers, and other animals, (i.e. kept in a secure lock up or on pallets off of the ground).

Otters and Beavers

- 5.4.53 Otters *Lutra lutra* are protected under the Conservation of Habitats and Species Regulations (2019) as amended and under the Wildlife and Countryside Act, 1981 (as amended) which makes it an offence to kill, injure or capture an otter, intentionally or recklessly disturb otters; or to damage, destroy or intentionally or recklessly obstruct access to a holt or other resting places. Otters are also listed as SPI under the NERC Act 2006.
- 5.4.54 Eurasian beavers *Castor fiber* are protected under the Conservation of Habitats and Species Regulations (2019) as amended and under the Wildlife and Countryside Act, 1981 (as amended) which makes it an offence to kill, injure or capture a beaver, deliberately disturb beavers; or to damage or destroy the breeding site or resting place of a beaver.
- 5.4.55 No aquatic and very limited suitable terrestrial habitat was recorded within the Site and immediate surroundings.
- 5.4.56 On this basis, the Site was identified as having negligible potential to support otters and beavers and are therefore not considered an ecological constraint and are not considered further in this report.



Other Mammal Species

Water voles

- 5.4.57 Water voles *Arvicola amphibious* and their places of shelter are protected under the Wildlife and Countryside Act, 1981 (as amended) which makes it an offence to kill, injure or take any water vole, damage, destroy or obstruct access to any place of shelter or protection that the animals are using, or disturb voles while they are using such a place. Water voles are also listed as SPI under the NERC Act 2006.
- 5.4.58 No aquatic and very limited suitable terrestrial habitat was recorded within the Site and very limited habitat was recorded in the immediate surroundings of the Site. This was limited to the earth bank forming the eastern Site boundary, and the adjacent waterbody WB1 parallel to this earth bank, which extended further, also running parallel to the southern Site boundary.
- 5.4.59 Waterbody WB1 was considered to provide some limited potential foraging and burrowing opportunities for water voles, although the suitability of this waterbody to support water voles was limited. The section parallel to the eastern boundary was heavily vegetated and shaded with dense scrub, which to a degree precludes burrowing opportunities for water voles. The section of waterbody WB1 parallel to the southern Site boundary featured shallow embankments, which precludes burrowing opportunities, and was partially constrained to concrete channels, particularly toward the western extent. Furthermore, the Site was subject to frequent disturbance in the form of noise, dust, vibration and visual disturbance from its current Site use. Furthermore, the presence of cat paw prints along with evidence of fox presence across the Site indicated potentially increased levels of predation.
- 5.4.60 Given the above, waterbody WB1 was considered unlikely to support water voles., however, their presence cannot be fully ruled out.
- 5.4.61 On this basis, water voles are considered a potential ecological constraint to the proposed development.
- 5.4.62 Any proposed development of the Site could also result in adverse indirect impacts on water voles, for example as a result of the deterioration in the aquatic environment from increased pollution run-off from construction related activities.
- 5.4.63 No works are proposed within 40m of waterbody WB1 parallel to the eastern Site boundary, and the works nearest to waterbody WB1 parallel to the southern Site boundary are limited to existing hardstanding and a small parcel of disconnected grassland, where the parallel section of waterbody WB1 was constrained to concrete channels. Given the above, direct impacts on water voles are considered very unlikely and establishing a 5m no-construction buffer zone is not considered necessary on this occasion.
- 5.4.64 To avoid indirect impacts on water voles, for example, in the form of increased dust, particulate matter and run-off during the demolition and construction phase, it is recommended that a strict pollution prevention protocol be adhered to during all stages of the proposed development.
- 5.4.65 Provided the above avoidance and mitigation measures are adhered to, no adverse direct or indirect effects on water voles are expected as part of the proposed development and no further surveys are considered necessary on this occasion.

European Hedgehog

- 5.4.66 The European hedgehog *Erinaceus europaeus* is classified as an SPI under the NERC Act 2006. Therefore, the presence of this species on site would be a material consideration in the planning process.
- 5.4.67 The Site supported some suitable semi-natural habitat for hedgehogs. However, the proposed development is considered unlikely to result in impacts on European hedgehogs given the size and nature of the Site and presence of other suitable habitat within the wider surroundings and providing mitigation measures detailed below are adhered to.



- 5.4.68 Hedgehogs should be specifically watched for during the removal of features considered to provide potential sheltering habitat (i.e. dense scrub and brash piles). If any hedgehogs are found, they should be carefully moved to retained areas of vegetation outside of the Site.
- 5.4.69 Furthermore, any new boundaries required as part of the proposed development should be permeable to hedgehogs in order to main habitat connectivity across the Site and wider surroundings. This can be achieved by creating ground-level boundary holes (approximately 13cm x 13cm) which should link as many neighbouring land parcels as possible.
- 5.4.70 In addition, parcels of dense scrub, shrubs and tussocky grassland and features such as deadwood and brash piles should be maintained and/or created across the Site in order to provide important foraging and nesting opportunities for hedgehogs.

Rabbits and Foxes

- 5.4.71 It should also be noted that evidence of red foxes *Vulpes vulpes* in the form of scat, paw prints and feeding remains were recorded within the Site during the ecological walkover survey, particularly focused along the northern and eastern Site boundary. Additionally, a cavity was found beneath an electrical box by building B3, just outside of the western Site boundary with characteristic fox scent.
- 5.4.72 Rabbits *Oryctolagus cuniculus* and foxes are protected under the Wild Mammals (Protection) Act 1996 which makes it an offence to crush or asphyxiate or inflict unnecessary suffering to any and all wild mammals.
- 5.4.73 The current proposals therefore do have the potential to contravene the Wild Mammals (Protection) Act 1996, through causing the collapse of tunnels and their entrances, which may cause crushing or asphyxiation to any rabbits or foxes present within the cavity by building B3 and any tunnels potentially present within the earth bank along the eastern boundary.
- 5.4.74 While no works are proposed directly affecting those areas, due to the mobile nature of both species, and the presence of suitable habitat in the immediate vicinity of the Site, a site walkover should be undertaken before works commence, to ensure no new dens or warrens have become established. This can be undertaken at the same time as the walkover for badgers.
- 5.4.75 Should any new dens or warrens be found, it is recommended that they be sensitively deconstructed by soft-digging and supervised by a suitably qualified ecologist, to ensure than no offence will be committed.

Invertebrates

- 5.4.76 A number of invertebrate species such as stag beetles *Lucanus cervus* are afforded protection under the Conservation of Habitats and Species Regulations 2019 (as amended) and under Schedule 5 of the Wildlife and Countryside Act, 1981 (as amended). Many invertebrate species including the stag beetle are also listed as SPI under the NERC Act 2006. The white-clawed crayfish *Austropotamobius pallipes*, a freshwater invertebrate species, is also listed on Schedule 5 of the Wildlife and Countryside Act, 1981 (as amended).
- 5.4.77 All protected invertebrate species listed on Schedule 5 of the Wildlife and Countryside Act, 1981 (as amended) identified within the search area as part of the desk study are considered likely absent from the Site as their preferred food plants were considered to be either likely absent or not recorded in sufficient quantity to otherwise support a viable population.
- 5.4.78 In addition, the Site was considered to provide very limited opportunities for protected and notable invertebrate species given the absence of invertebrate microhabitats such as woodland edge, herb-rich grassland habitats and deadwood. Protected and notable invertebrate species are therefore not considered an ecological constraint and are not considered further in this report.

Plants



- 5.4.79 Wild plants are protected under the Wildlife and Countryside Act 1981 (as amended) which prohibits the unauthorised intentional uprooting of any wild plant species and forbids any picking, uprooting or destruction of plants listed on Schedule 8 of which there are over 150 species. In addition, nine plant species are afforded protection under the Conservation of Habitats and Species Regulations 2019 (as amended). Many plant species are also listed as SPI under the NERC Act 2006.
- 5.4.80 The habitats on Site were common and widespread and therefore provided limited potential to support protected and notable and rare plant species.
- 5.4.81 Section 14(1) of the Wildlife and Countryside Act 1981 (as amended) makes it illegal to plant or otherwise cause to grow in the wild any plant listed in Schedule 9 of the Act including Himalayan cotoneaster *Cotoneaster simonsii*.
- 5.4.82 Two stands of cotoneaster were recorded within the Site. This included one stand of Himalayan cotoneaster *Cotoneaster simonsii*, which was located next to the stairs leading to building B1, and one stand of late cotoneaster *Cotoneaster coriaceus*, which was found within the eastern Site extent, growing above material bays. Late cotoneaster is not currently listed on schedule 9 of the Wildlife and Countryside Act 1981 (as amended).
- 5.4.83 Works associated with any proposed development of the Site, for example habitat clearance or maintenance, including trimming or pruning, could therefore result in the spread of Himalayan cotoneaster. On this basis, invasive plant species are therefore considered a potential ecological constraint. In order to comply with legislation regarding invasive plant species, the mitigation measures detailed below should be adhered to.
- 5.4.84 Any habitat clearance works (particularly vegetation clearance and earth-works near the north-western extent of the Site) associated with the proposed development of the Site should safely manage and correctly remove and dispose of the cotoneaster in order to prevent its spread.
- 5.4.85 Any works associated with the proposed development of the Site should be undertaken in accordance with the regulatory position statement (RPS) for invasive plant species; *Treatment and disposal of invasive non-native plants: RPS 178* (Environment Agency, 2016). In addition, a specialist contractor should be employed to manage and remove variegated yellow archangel from the Site, if required, in order to prevent its spread.

5.5 Ecological Enhancements

- 5.5.1 Under Section 40 of the NERC Act 2006 there is a duty to have regard to biodiversity conservation. In addition, the National Planning Policy Framework (2024) and the Adopted Core Strategy Development Plan (Wokingham Borough Council, 2010) encourages ecological enhancement to be integrated into development projects in order to achieve an overall net-gain in biodiversity. Given the above, the following enhancement recommendations should be considered and incorporated into the final design proposals:
- Installation and maintenance of artificial bat bricks or bat tubes (i.e. Schwegler 1FR and 2FR bat tubes and Schwegler 1GS bat brick or similar) into any new buildings and installation of bat boxes (i.e. Schwegler 2FN or similar) on to suitable retained trees to increase the roosting opportunities for bats within the Site. Any artificial roosting features should be placed between 3m and 6m above ground in a variety of locations at slightly different heights and preferably positioned facing a variety of directions.
 - Installation and maintenance of artificial bird nest boxes onto any retained trees and new buildings on Site to increase nesting opportunities for many bird species. Given their designation as SPI, particular consideration should be given to installing house sparrow (i.e. Schwegler 1SP or similar) and starling (i.e. Schwegler 3S or similar) nest boxes onto any retained trees and any new buildings within the Site.



- Planting of native species rich hedgerows and/or 'natural buffer strips' along the access roads and plot boundaries, ideally connecting with existing hedgerows. Approximately five woody plants should be planted per metre of hedgerow, in double staggered rows. The hedgerow should be managed on an annual rotation, whereby half of each hedgerow is cut in any one year. This will encourage a diverse structure to produce both a wide and dense hedgerow. Woody species planted could include the following species:
 - o Oak *Quercus* sp;
 - o Hazel *Corylus avellana*;
 - o Hawthorn *Crataegus monogyna*;
 - o Blackthorn *Prunus spinosa*;
 - o Field maple *Acer campestre*;
 - o Holly *Ilex aquifolium*;
 - o Elder *Sambucus nigra*; and
 - o Crab apple *Malus sylvestris*.
- Incorporation of dead wood habitat piles within areas of retained suitable habitat for example underneath tree canopies and along pond margins. These are used by both invertebrates such as the stag beetle which is a SPI and by reptiles and widespread amphibians as refugia.
- Incorporation of a 'Bee Brick' into the new building(s). The Bee Brick should be positioned facing a southerly direction, in an area that receives a lot of light and warmth throughout the day and without vegetational obstruction to the entrances. It is recommended that for every Bee Brick installed, a minimum of 1m² of 'bee friendly' plant species be planted to support any solitary bees that would likely utilise the feature. The plant species could include:
 - o Common yarrow *Achillea millefolium*;
 - o Greater knapweed *Centaurea scabiosa*;
 - o Common foxglove *Digitalis purpurea*;
 - o Hemp agrimony *Eupatorium cannabinum*;
 - o Common honeysuckle *Lonicera periclymenum*;
 - o Wild marjoram *Origanum vulgare*; and
 - o Guelder rose *Viburnum opulus*.



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7 APPENDICES

Appendix I: Site Location Plan



LEGEND:

 Site Boundary

STATUS: FOR INFORMATION ONLY



Sussex Office: Rocks Yard, Victoria Rd, Herstmonceux, Hailsham, BN27 4TQ.
T: 01323 832120.

Kent Office: The Watermill, Maidstone Road, Ashford, Kent, TN26 1AE.
T: 01233 225365

E: contact@pjconsultancy.com
W: <https://www.pjconsultancy.com>

CLIENT: Wokingham Borough Council

PROJECT: Toutley Depot
Wokingham
Berkshire
RG41 1QN

TITLE:
Appendix I: Site Location Plan

SCALE AT A4: 1:3,000	DRAWN: IR	APPROVED: TK
PROJECTION: EPSG:27700	DATE: 17/02/26	DATE: 17/02/26

DRAWING No:
PJC/6852E/26/A1/V1



Appendix II: Legislation and Planning Policy

Legislation

The Environment Act (2021)

The Environment Act (2021) is the UK's framework of environmental protection, post Brexit, and provides binding targets for improving air quality, water, biodiversity, and waste reduction. The Environment Act requires all development schemes in England (that are subject to Town and Country Planning Act 1990) to deliver a mandatory 10% biodiversity net gain (BNG) to be maintained for a period of at least 30 years. The concept seeks measurable improvements for biodiversity by creating or enhancing habitats in association with development. Key parts of the Environment Act 2021 which relate to BNG and its delivery are Part 6: Nature and Biodiversity and the supporting Schedule 14, particularly sections 9(3), 13(1), 14(2) and 15.

The Conservation of Habitats and Species (Amendment) Regulations 2017

The Conservation of Habitats and Species (Amendment) Regulations 2017 is the UK transposition of the European Council Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna, 1992, or the 'Habitats Directive'. The directive provides protection of key habitats and species of European importance. Those key habitats and species are listed in Annexes II and IV of the directive.

Those species protected under the regulations and most likely encountered during development include:

- All bat species
- Hazel dormouse
- Great crested newt
- Common otter

The Wildlife and Countryside Act 1981 (as amended)

The Wildlife and Countryside Act 1981 (as amended) is the primary legislation for the protection of wildlife in Great Britain. This legislation is the means by which the Convention on the Conservation of European Wildlife and Natural Habitats (the 'Bern Convention') and the European Union Directives on the Conservation of Wild Birds (79/409/EEC) and Natural Habitats and Wild Fauna and Flora (92/43/EEC) are implemented in Great Britain. All breeding birds, their nests, eggs and young are protected under the Act, which makes it illegal to knowingly destroy or disturb the nest site during nesting season. Schedules 1, 5 and 8 afford protection to individual birds, other animals and plants respectively. The Countryside and Rights of Way (CROW) Act 2000 makes it an offence to 'recklessly' disturb a protected animal whilst it is using a place of rest or shelter or breeding/nest site

Those species protected under the act and most likely encountered during development include:

- All bat species
- All nesting birds
- Hazel dormouse
- Great crested newt
- Common otter
- Water vole
- All native reptile species



- White-clawed crayfish

The Protection of Badgers Act 1992

The Protection of Badgers Act 1992 consolidates and strengthens previous legislation (including the Badgers (Further Protection) Act 1991). Under the act, it is an offence to:

- Wilfully kill, injure or take a badger (or attempt to do so).
- Cruelly ill-treat a badger.
- Dig for a badger.
- Intentionally or recklessly damage or destroy a badger sett, or obstruct access to it.
- Cause a dog to enter a badger sett.
- Disturb a badger when it is occupying a sett.

The Natural Environment and Rural Communities Act (NERC) 2006

Section 40 of the Act requires all public bodies to have regard to biodiversity conservation when carrying out their functions. This is commonly referred to as the 'biodiversity duty'. Section 41 of the Act provides a list of habitats and species, which are of 'principal importance for the conservation of biodiversity.' This list aids decision makers such as public bodies in implementing their duty under Section 40 of the Act. Under the Act these habitats and species are regarded as a material consideration in determining planning applications.

Hedgerows Regulations 1997

These regulations were produced to protect important countryside hedges from removal. The regulations only cover hedgerows that are at least 20m long or, if shorter, connected to other hedgerows at both ends or part of a longer hedgerow. They must be in or adjacent to common land, village greens, site of special scientific interest, local nature reserves, or land used for agriculture, forestry or breeding or keeping of horses, ponies or donkeys.

Wild Mammals (Protection) Act 1996

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

This legislation is of relevance when undertaking works with potential to affect wild mammals e.g. works near burrows, warrens or dens, regardless of other legislative protection.

Species and Habitat Specific Legislation

Plants

Wild plants are protected under Section 13 of the Wildlife and Countryside Act 1981 (as amended). It prohibits the unauthorised intentional uprooting of any wild plant species and forbids any picking, uprooting or destruction of plants listed on Schedule 8 of which there are over 150.

The Conservation of Habitats and Species Regulations 2019 (as amended) have nine plants listed within Annex IV these are; creeping marshwort *Apium repens*, early gentian *Gentianella anglica*, fen orchid *Liparis loeselii*, floating-leaved water plantain *Luronium natans*, killamey fern *Trichomanes speciosum*, lady's slipper *Cypripedium calceolus*, shore dock *Rumex rupestris*, slender naiad *Najas flexilis*, and yellow marsh saxifrage *Saxifraga hirculus*. It is an offence to deliberately pick, collect cut, uproot or destroy any protected plant, or keep, transport, sell, or exchange, any live or dead such plant species, this applies to all stages of its life cycle.



Invasive Species

Schedule 9, Section 14 of the Wildlife and Countryside Act (1981, as amended) prohibits the introduction into the wild of any species that is not ordinarily resident in and is not a regular visitor to Great Britain in a wild state, or any species of the 69 plants listed on Schedule 9.

The frequently encountered invasive species within proposed development sites include floating pennywort *Hydrocotyle ranunculoides*, giant hogweed *Heracleum mantegazzianum*, Himalayan balsam *Impatiens glandulifera*, Japanese knotweed *Fallopia japonica*, New Zealand pygmyweed *Crassula helmsii*, rhododendron *Rhododendron ponticum* and certain hybrids of the above, some species may be native yet are listed for conservation purposes.

Plant or soil material contaminated by Japanese knotweed that is to be discarded is considered to be a 'controlled waste' under the Environmental Protection Act 1990 (EPA 1990). It is an offence to deposit, treat, keep, or dispose of controlled waste without a licence. Furthermore, knotweed that has been cut down and removed must be received by an authorised person to be disposed of correctly. A licence can be obtained from the Environment Agency (EA). The release or planting of a listed species in the wild can be permitted under a licence granted by the relevant statutory body.

Invertebrates

A number of invertebrates such as silver studded blue butterfly *Plebejus argus*, stag beetles *Lucanus cervus* and white letter hairstreak *Stymondia w-album* are fully protected under Schedule 5 of the Wildlife and Countryside Act (1981, as amended). This legislation makes it illegal to intentionally kill, injure, or take a protected invertebrate, or to damage, destroy, or obstruct access to any structure or place used for shelter or protection by such a species; and disturb any protected species occupying such a structure or place.

Three invertebrates are listed under Schedule 2 of the Conservation of Habitats and Species Regulations 2019, fisher's estuarine moth *Gortyna borelii lunata*, the large blue butterfly *Maculinea arion* and lesser whirlpool ram's-horn snail *Anisus vorticulus*. It is an offence deliberately to kill, capture, or disturb a listed species, or to damage or destroy the breeding site or resting place of such an animal.

Amphibians

There are four widespread amphibian species, common frog *Rana temporaria*, common toad *Bufo bufo*, palmate newt *Lissotriton helveticus* and smooth newt *Lissotriton vulgaris*. All of the four widespread species receive partial protection under Schedule 5 of the Wildlife and Countryside Act (1981, as amended) making it an offence to offer them for sale or trade.

Great crested newts *Triturus cristatus* and natterjack toads *Epidalea calamita* are fully protected under Schedule 5 (in respect of section 9(4)(b) and (c) and (5) only) of the Wildlife and Countryside Act (1981, as amended) and the Conservation of Habitats and Species Regulations 2019. Reintroduced populations of 'native' pool frogs *Pelophylax lessonae* also receive the same protection. It is illegal to possess a protected species (alive or dead), deliberately capture, injure or kill, to intentionally or recklessly disturb, or to deliberately take or destroy the eggs of these protected species. It is also illegal to damage, destroy or intentionally or recklessly obstruct access to breeding or resting place used by these protected species'. All life stages of each species' are afforded the same level of protection.

In order to undertake any activity, which would, otherwise result in any of the above offences being committed, it may be necessary to obtain a European Protected Species (EPS) licence from the relevant statutory body (Natural England (NE), Countryside Council for Wales (CCW) or Scottish Natural Heritage (SNH)). It is possible to undertake surveys which would otherwise involve unlawful acts, such



as disturbance, by obtaining a survey licence which provides authorisation for scientific and educational purposes

Reptiles

The four common reptile species, adder *Vipera berus*, grass snake *Natrix helvetica*, common lizard *Zootoca vivipara* and slow worm *Anguis fragilis* are protected under Schedule 5 of the Wildlife and Countryside Act (1981, as amended) against deliberate and/or intentional killing, injuring and trade.

If common reptile species are found to be present or considered potentially present within a proposed development site. To ensure that no subsequent offence will be committed a precautionary method of working (written by a suitably qualified ecologist) and submitted to the relevant authority may be required to enable works to proceed with limited risks of offences being caused.

Birds

All birds, their nests and eggs are protected by the Wildlife and Countryside Act (1981, as amended). It is an offence to intentionally kill, injure, or take any wild bird, or take or destroy an egg of any wild bird. It is also an offence to damage or destroy the nest of any wild bird (whilst being built, or in use). Therefore, clearance of vegetation within the site boundary, or immediately adjacent to the site during the nesting season could result in an offence occurring under the Act. The bird breeding season can be taken to run between the 1 February and 31 August and is subject to geographical and seasonal factors. There are 79 species of birds listed under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended). It is an offence to intentionally or recklessly disturb any wild bird listed on Schedule 1 while it is nest building, or at a nest containing eggs or young, or disturb the dependent young of such a bird.

Barn owls *Tyto alba* are given the highest level of legal protection possible under Schedule 1 of the Wildlife and Countryside Act 1981. It is therefore illegal to kill, injure or take a barn owl, or to take or destroy its eggs. It is also illegal to intentionally or recklessly take, damage, or destroy the nest of any wild bird while it is in use or being built, release or allow the escape of a barn owl into the wild or possess any bird (dead or alive) or part of bird without a licence which is obtainable through the country agencies (EN, SNH, and CCW).

Badgers

Badgers *Meles meles* are protected under the Protection of Badgers Act (1992) and the Wildlife and Countryside Act (1981, as amended). As such it is an offence to wilfully take, kill, injure or ill-treat a badger, or possess a dead badger or any part of a badger. Under the Act their setts are also protected against obstruction, destruction, or damage in any part.

Sett interference includes damaging or destroying a sett, obstructing access to a sett, and disturbing a badger whilst it is occupying a sett. The Act defines a badger sett as 'any structure or place, which displays signs indicating the current use by a badger' and Natural England takes this definition to include seasonally used setts.

Work that may disturb badgers or their setts is illegal without a development licence from the relevant statutory body (NE, CCW, SNH). As a precautionary principle, a buffer distance between a badger sett and the works will be determined, based upon guidance from an appropriately experienced ecologist. This buffer distance should be based upon the size and activity levels at the sett, the topography between the sett and the works and the nature of the works.

Bats

All native UK bat species are fully protected by UK law under Schedule 5 (in respect of section 9(4)(b) and (c) and (5) only) and Schedule 6 of the Wildlife and Countryside Act (1981, as amended), and under Schedule 2 of the Conservation of Habitats and Species Regulations 2019. It is illegal to deliberately



capture, injure or kill a bat or to intentionally or recklessly disturb bats. It is also illegal to damage, destroy or intentionally or recklessly obstruct access to a breeding or resting place used by a bat.

Any activity that would result in a contravention of the above legislation would likely require an EPS licence from the relevant statutory body (NE, CCW or SNH). Works or mitigation activities involving interference with bats or bat shelters must be carried out by a licensed bat worker.

Dormice

Dormice *Muscardinus avellanarius* are protected under Schedule 5 (in respect of section 9(4)(b) and (c) and (5) only) of the Wildlife and Countryside Act (1981, as amended) and are listed in Schedule 2 of the Conservation of Habitats and Species Regulations 2019. Under the current legislation it is illegal to intentionally or deliberately kill, injure or capture dormice, deliberately disturb dormice (whether in a nest or not); or to damage, or destroy dormouse breeding sites or resting places.

Any activity that would result in a contravention of the above legislation would likely require an EPS licence from the relevant statutory body (NE, CCW or SNH).

Otters

The otter *Lutra lutra* is fully protected under Schedule 5 (in respect of section 9(4)(b) and (c) and (5) only) of the Wildlife and Countryside Act (1981, as amended) and are listed under Schedule 2 of the Conservation of Habitats and Species Regulations 2019. It is therefore illegal to deliberately capture, injure or kill an otter, possess an otter (dead or alive), or any other part of an otter, or intentionally or recklessly disturb otters. It is also illegal to damage, destroy or intentionally or recklessly obstruct access to a holt or other resting place used by an otter.

Any activity that would result in a contravention of the above legislation would likely require an EPS licence from the relevant statutory body (NE, CCW or SNH).

Water voles

Water voles *Arvicola amphibious* are protected under Schedule 5 of the Wildlife and Countryside Act (1981, as amended). It is an offence to possess, control or sell water voles or to intentionally kill, injure or take water voles. It is also an offence to intentionally or recklessly damage, destroy or obstruct access to a place that water voles use for shelter or protection or disturb water voles whilst using such a place.

A licence is required for catching/handling water voles, or for field surveys that are intrusive or disturbing where the surveyor suspects' water voles are present. A licence can be obtained by applying to the relevant statutory body (NE, SNH, and CCW,). Please note that the legislation does not permit licences to be issued in relation to development of land.

Biodiversity Policies

National Planning Policy Framework (NPPF) 2024

Published in 2024 the NPPF sets out the Government's planning policies for England and how these are expected to be applied by local authorities. It replaces all the Planning Policy Statements and Guidance (PPSs and PPGs). The NPPF emphasises the need for sustainable development, whilst specifying the need for protection of designated sites and priority habitats and priority species (as listed in section 41 of the Natural Environment and Rural Communities (NERC) Act 2006). Paragraph 187 of The National Planning Policy Framework (NPPF) states:

“Planning policies and decisions should contribute to and enhance the natural and local environment by:



- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;
- preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and
- remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.”

Paragraph 192 states that “to protect and enhance biodiversity and geodiversity, plans should:

- 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
- 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.”

Furthermore, paragraph 193 states that when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

- 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;
- 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;
- 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 and a suitable compensation strategy exists; and
- development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for



biodiversity or enhance public access to nature where this is appropriate.

Paragraph 194 states:

“The following should be given the same protection as habitats sites:

- potential Special Protection Areas and possible Special Areas of Conservation;
- listed or proposed Ramsar sites; and
- sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.”

Paragraph 195 states:

“The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.”

The UK Biodiversity Framework (2011-2020).

The UK Biodiversity Framework is an important framework that is owned, governed and implemented by the four UK countries, assisted by Defra and JNCC in their UK co-ordination capacities. Although differing in details and approach, the four UK countries have published strategies which promote the same principles and address the same global targets: joining-up our approach to biodiversity across sectors; and identifying, valuing and protecting our ‘Natural Capital’ to protect national well-being now and in the future. This new framework has been developed to enhance the recovery of priority habitats and species in England (published under section 41 of the NERC Act 2006), thereby contributing to the delivery of the England Biodiversity Strategy. The framework has been developed and endorsed by the England Biodiversity Group and wider partnership. It is the starting point for a more integrated approach to biodiversity conservation in England, building on the strengths of the former UK Biodiversity Action Plan (BAP) process and improving those areas where insufficient progress was being made.

Adopted Core Strategy Development Plan (Wokingham Borough Council,2010)

The Adopted Core Strategy Development Plan (Wokingham Borough Council,2010) sets out the relevant policies for the control of development with regards to the natural environment and biodiversity, in particular policies CP1 Sustainable Development, CP3 General Principles for development, and CP7 Biodiversity.

CP1 – Sustainable development

Planning permission will be granted for development proposals that:

- 1) Maintain or enhance the high quality of the environment;
- 2) Minimise the emission of pollutants into the wider environment;
- 3) Limit any adverse effects on water quality (including ground water);
- 4) Ensure the provision of adequate drainage;
- 5) Minimise the consumption and use of resources and provide for recycling;
- 6) Incorporate facilities for recycling of water and waste to help reduce per capita water consumption;
- 7) Avoid areas of best and most versatile agricultural land;
- 8) Avoid areas where pollution (including noise) may impact upon the amenity of future occupiers;
- 9) Avoid increasing (and where possible reduce) risks of or from all forms of flooding (including from groundwater);



- 10) Provide attractive, functional, accessible, safe, secure and adaptable schemes;
- 11) Demonstrate how they support opportunities for reducing the need to travel, particularly by private car in line with CP6; and
- 12) Contribute towards the goal of reaching zero-carbon developments⁴¹ as soon as possible by:
 - a) Including appropriate on-site renewable energy features; and
 - b) Minimising energy and water consumption by measures including the use of appropriate layout and orientation, building form, design and construction, and design to take account of microclimate so as to minimise carbon dioxide emissions through giving careful consideration to how all aspects of development form.

CP3 - General Principles for development

Planning permission will be granted for proposals that:

- a) Are of an appropriate scale of activity, mass, layout, built form, height, materials and character to the area together with a high quality of design without detriment to the amenities of adjoining land users including open spaces or occupiers and their quality of life;
- b) Provide a functional, accessible, safe, secure and adaptable scheme;
- c) Have no detrimental impact upon important ecological, heritage, landscape (including river valleys) or geological features or water courses.
- d) Maintain or enhance the ability of the site to support fauna and flora including protected species;
- e) Use the full potential of the site and contribute to the support for suitable complementary facilities and uses;
- f) Contribute to a sense of place in the buildings and spaces themselves and in the way they integrate with their surroundings (especially existing dwellings) including the use of appropriate landscaping;
- g) Provide for a framework of open space in secure community use achieving at least 4.65 ha/1,000 population provision together with recreational/sporting facilities in addition to private amenity space;
- h) Contribute towards the provision of an appropriate sustainable network of community facilities;
- i) Do not lead to a net loss of dwellings and other residential accommodation or land; and
- j) Do not lead to a loss of community or recreational facilities/land or infrastructure unless suitable alternative provision is available.

Development proposals will be required to demonstrate how they have responded to the above criteria through the submission of Design and Access Statements, clear and informative plans, elevations and street scenes and where required Masterplans, Development Briefs, Concept Statements and Design Codes.

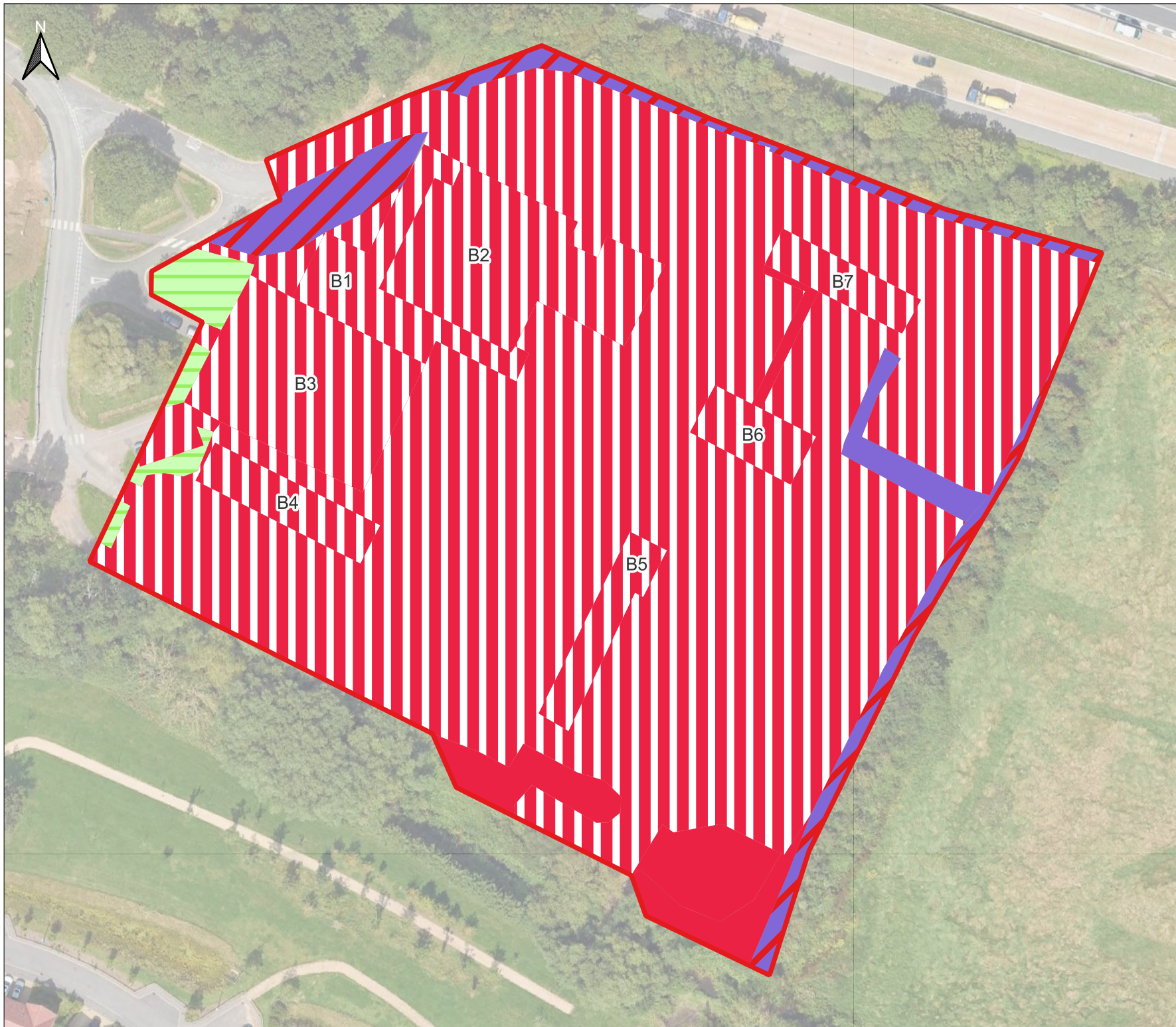
CP7 - Biodiversity

Sites designated as of importance for nature conservation at an international or national level will be conserved and enhanced and inappropriate development will be resisted. The degree of protection given will be appropriate to the status of the site in terms of its international or national importance. Development:

- A) Which may harm county designated sites (Local Wildlife Sites in Berkshire), whether directly or indirectly, or
- B) Which may harm habitats or, species of principle importance in England for nature conservation, veteran trees or features of the landscape that are of major importance for wild flora and fauna (including wildlife and river corridors), whether directly or indirectly, or
- C) That compromises the implementation of the national, regional, county and local biodiversity action plans will be only permitted if it has been clearly demonstrated that the need for the proposal outweighs the need to safeguard the nature conservation importance, that no alternative site that would result in less or no harm is available which will meet the need, and:
 - i) Mitigation measures can be put in place to prevent damaging impacts; or
 - ii) Appropriate compensation measures to offset the scale and kind of losses are provided.



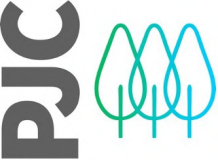
Appendix III: Ecological Walkover Survey Map



LEGEND:

- Bramble scrub
- Developed land; sealed surface
- Introduced shrub
- Mixed scrub
- Other neutral grassland
- Vacant or derelict land
- Site Boundary

STATUS: FOR INFORMATION ONLY



Sussex Office: Rocks Yard, Victoria Rd, Herstmonceux, Hailsham, BN27 4TQ.
T: 01323 832120.

Kent Office: The Watermill, Maidstone Road, Ashford, Kent, TN26 1AE.
T: 01233 225365

E: contact@pjcconsultancy.com
W: <https://www.pjcconsultancy.com>

CLIENT: Wokingham Borough Council

PROJECT: Toutley Depot
Wokingham
RG41 1 QN

TITLE: Appendix III: Ecological Walkover Map

SCALE AT A4: 1:1,000	DRAWN: IR	APPROVED: TK
PROJECTION: EPSG:27700	DATE: 25/02/26	DATE: 26/02/26

DRAWING No:
PJC/6852E/26/A3/V1



Appendix IV: Site Photographs

All Site photographs were taken by Isabel Howind Rodriguez BSc(Hons) MSc on 18th February 2026.



Photograph 1: Building B1, western elevation.



Photograph 2: Building B2, northern elevation.



Photograph 3: Building B2, south-eastern elevation.



Photograph 4: Building B3, eastern elevation.



Photograph 5: Building B3, south-western elevation.



Photograph 6: Building B4, north-eastern elevation.



Photograph 7: Building B5, south-western elevation.



Photograph 8: Building B6, southern elevation.



Photograph 9: Building B7, south-western elevation.



Photograph 10: Grassland parcel with scattered trees at the western extent of the Site.



Photograph 11: Cherry laurel at eastern Site extent.



Photograph 12: Scrub by building B1, includes some Himalayan cotoneaster by the stairs.



Photograph 13: Scrub along northern Site boundary.



Photograph 14: Eastern Site extent, as seen from the northern Site boundary.



Photograph 15: Late cotoneaster within eastern Site extent.



Photograph 16: Eastern Site boundary.



Photograph 17: Site as seen from the eastern boundary.



Photograph 18: Southern Site extent, as seen from eastern boundary.



Photograph 19: Location of proposed vehicle barrier.



Photograph 20: Tree T21, off-site, by southern Site boundary.



Photograph 21: Tree T6, off-site, by western Site boundary.



Photograph 22: Tree T8, off-site, by western Site boundary.



Appendix V: Waterbody Location Plan



LEGEND:

Waterbody

250m Buffer Zone

Site Boundary

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E: contact@pjcoconsultancy.com
W: <https://www.pjcoconsultancy.com>

CLIENT:

Wokingham Borough Council

PROJECT:

Toutley Depot
Wokingham
Berkshire
RG41 1QN

TITLE:

Appendix V: Waterbody Location Plan

SCALE AT A4:

1:4,500

DRAWN:

IR

APPROVED:

TK

PROJECTION:

EPSG:27700

DATE:

26/02/26

DATE:

26/02/26

DRAWING No:

PJC/6852E/26/A5/V1



Appendix VI: Precautionary Non-Licensed Method Statement

MITIGATION MEASURES

The mitigation measures detailed below are provided to ensure that in the unlikely event of reptiles, GCN or dormice being present within the Site, they are protected from death, injury or disturbance, and that their resting places are also protected from damage, destruction, or obstruction of access.

PRIOR TO CONSTRUCTION WORKS

All site workers undertaking any habitat clearance works will receive an ecological Tool Box Talk (TBT) with a focus on reptiles, GCN and dormice from a suitably qualified ecologist prior to undertaking habitat clearance works on Site.

DURING CONSTRUCTION WORKS

Access and egress routes for people and plant must be kept to existing areas of hardstanding, bare earth and grassland (providing the grassland sward has been maintained below 100mm in height).

Habitat clearance must be conducted using a two-stage directional approach, first reducing the vegetation to approximately 100mm above ground, then the second cut reducing it to ground level. This technique will allow any protected species potentially present within the Site to naturally disperse to other areas of suitable semi-natural habitat within the surroundings.

An ecologist must fingertip search the cleared areas either before the first cut to look for any evidence of dormice or other protected species.

All suitable habitat clearance must take place between April to May or late September to October to avoid the dormouse maternity season (when dependant young may be present) and the hibernation season (when dormice and reptiles are more vulnerable to disturbance, injury and death.)

All suitable dormouse, reptile and GCN habitat removal must be supervised at all times by a suitably qualified ecologist.

Potential refuge features, such as exposed tree roots and mammal burrows potentially used by hibernating reptiles or GCN must not be moved or affected during the hibernation season (November to March). All features must be deconstructed sensitively, whereby removing half of the feature (top-down) and removing the second half after 24 hours.

All arisings generated from habitat clearance works must be removed from Site and should not be stored on Site for any longer than a 24-hour period. In the event that this is not possible, all arisings must be stored within a skip or a minimum of 10m away from retained suitable reptile, GCN and dormouse habitat, and only on existing hardstanding or bare earth.

All excavations should be excavated individually and back filled immediately where possible. Where this is not possible, excavations must be covered to prevent reptiles, GCN and dormice (and other animals) becoming trapped within the excavation. If this is also not possible, one or both sides of the excavation must be sloped in order to allow egress from the excavation.

All machinery, equipment and materials must be stored on areas identified by an ecologist as being unsuitable for reptiles, GCN or dormice, for example, hardstanding or grassland of a short sward.



All site workers, particularly those involved in habitat clearance works, must remain vigilant at all times during construction works if at any point during construction works any protected species or signs of protected species, including reptiles, GCN or dormice are identified, the following instructions must be adhered to:

- Stop works immediately and leave the area;
- Inform an ecologist immediately who will then provide further guidance/instructions;
- Do not try to handle a reptile, GCN or dormouse; and
- Do not resume construction works until advised it is safe to do so by a suitably qualified ecologist.



CONTACT DETAILS

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