



**Carneys Yard, Church Lane, Three Mile Cross,
Reading, RG7 1HB**

**Preliminary Ecological Appraisal
& Biodiversity Net Gain Assessment**

May 2026

on behalf of Shaun Tanner Architecture & Planning

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1 Executive Summary

Site Details	Carneys Yard is located to the north of Church Lane, north-east of the village of Three Mile Cross, in Berkshire RG7 1HB. The approximate Ordnance Survey grid reference for the site is SU 7231 6836.
Proposals	The proposals include the construction of a new store building on the footprint of existing hardstanding.
Methodology	An UKHab Habitat Survey was undertaken on the 19th May 2026. A Biodiversity Net Gain (BNG) Assessment was conducted to calculate the potential impact of the proposed development on Habitat Units using the Statutory Biodiversity Metric. Watercourse Units are not relevant to this site.
Evaluation	- The site is comprised of developed land; sealed surface, artificial unvegetated, unsealed surface, bare ground, mixed scrub and modified grassland. - Most habitats are of negligible or low ecological value. The trees are considered to be of ecological value at the site level only. - No invasive, non-native species are present within the site. - The storage units are assessed as having 'negligible' potential suitability for roosting bats (Collins, 2023). - The trees within the site are assessed as having 'NONE' suitability for roosting bats (Collins, 2023).
Potential Impacts	- There are no impacts on habitats of principal importance or irreplaceable habitats. - There are no foreseeable impacts on roosting bats as a result of the proposals. The result of the BNG Metric calculation predicts a net gain in biodiversity for habitats. Total net unit change in habitats: +0.16 Habitat Units Total net % change in habitats: +12.96% Habitat Units Total net unit change in hedgerows: +0.22 Hedgerow Units Total net % change in hedgerows: N/A
Recommendations	No further surveys are considered necessary. European Protected Species (bat) Licence is not considered to be necessary for works to proceed.

2 Introduction

2.1 Site Description

Carneys Yard, referred to as the 'site' within this report, is located to the north of Church Lane, north-east of the village of Three Mile Cross, in Berkshire RG7 1HB. The approximate Ordnance Survey grid reference for the site is SU 7231 6836.

The site comprises a yard consisting of a line of storage container units (developed land; sealed surface), gravel yard (artificial unvegetated, unsealed surface) bare ground, mixed scrub and modified grassland. There are also individual trees within the site. The site is accessed via a metal gate to the north of Church Lane.

The site is surrounded by improved grassland and urban development. Habitats within the wider landscape are characterised by scattered business and residential buildings, improved grassland with scattered woodland copses. The M4 is located to the north of the site.

Please refer to Appendix 1 for photographs and Appendix 2 for site location plans.

2.2 Proposed Works

The proposals include the construction of a new store building on the footprint of existing hardstanding. New hedgerow planting within the site is also proposed.

A proposal plan is presented in Appendix 3.

2.3 Aims of Study

The aims of this study are to describe and evaluate the habitats present within the site and to assess the potential for the site to support protected and notable species (Preliminary Ecological Appraisal). The habitats are evaluated, and the report discusses the potential impacts of the proposed development on the ecology of the site and protected/notable species.

A further aim of this study is to assess and quantify the biodiversity value of the site and to assess and calculate the impacts of the proposed development on the site's biodiversity value, given as a net loss, no net change or gain in biodiversity units, in line with the National Planning Policy Framework (NPPF) and Environment Act 2021.

This report aims to:

- Establish the total number of baseline biodiversity units for the site prior to the development taking place;
- Establish the total number of biodiversity units which will be created, retained and/or enhanced under landscape and ecological mitigation proposals for the site of; and
- Determine whether the proposed development scheme will result in a net loss, no net loss or a net gain for biodiversity (Biodiversity Net Gain Assessment).

2.4 Biodiversity Statement

2.4.1 Exemption

The proposals are not exempt from the Biodiversity Net Gain (BNG) condition. The proposals will therefore need to deliver at least +10% Biodiversity Net Gain.

2.4.2 Pre-development Biodiversity Value of On-site Habitats

The pre-development biodiversity value of the site is as follows:

- 1.26 Habitat Units
- 0.00 Hedgerow Units

Watercourse Units are not applicable to this site.

2.4.3 *Loss of On-site Habitats*

There has been no loss of on-site habitats prior to the submission of the planning application.

Does the pre-development biodiversity value and date used above factor in the loss of any onsite habitat because of activities carried out before the submission of this application? – not applicable.

2.4.4 *Phased Development*

The development is not phased.

2.4.5 *Irreplaceable Habitats*

There are no irreplaceable habitats within the site.

2.4.6 *Date the On-site Pre-development Biodiversity Value was Calculated*

Date of application.

19th May 2026 was the date of the site visit. This is when the condition assessment for the habitats was undertaken.

2.4.7 *Version of the Biodiversity Metric*

Statutory Biodiversity Metric 1.0.4 (Appendix 8).

2.4.8 *Version of the Biodiversity Metric Publication Date*

3rd July 2025.

2.4.9 *Supporting Documentation*

- I. Biodiversity Metric calculation – provided in Excel format as Appendix 8 to this report. Results are as follows:

The result of the calculation predicts a **net gain** in biodiversity for habitat units.

Total net unit change in habitats: +0.16 Habitat Units

Total net % change in habitats: +12.96% Habitat Units

Total net unit change in hedgerows: +0.22 Hedgerow Units

Total net % change in hedgerows: N/A

The Trading Rules are **satisfied**.

Based on current proposal plans, achieving biodiversity net gain within the site is considered possible.

- II. Onsite irreplaceable habitats – not applicable
- III. Onsite habitats existing on the date of the application for planning permission

Table 1. UKHab habitats existing on the date of the application for planning permission.

Primary Code	Secondary Codes	Description
u1b5	-	Urban; Developed land; sealed surface (buildings)
u1c	-	Urban; Artificial unvegetated, unsealed surface
g4	-	Grassland; Modified grassland
u1	510	Urban; Bare ground
h3h	-	Heathland and shrub; Mixed scrub
g	200	Grassland; Individual trees

3 Methodology

3.1 Desk Study

The Multi-Agency Geographic Information for the Countryside (www.magic.gov.uk) website was searched for information regarding internationally protected sites (e.g. Special Areas of Conservation) within 5km of the survey area and statutory sites of nature conservation importance (e.g. Sites of Special Scientific Interest) within a 1km radius of the site.

Other Internet resources interrogated as part of the desk study include:

- Bing Maps - www.bing.com/maps
- Google Earth - www.earth.google.co.uk
- Google maps - www.google.co.uk/maps

Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 was also consulted to gather information pertaining to priority habitats and species for conservation action at the national and local level.

Aerial photography interpretation is used to place the site into an ecological context and to provide information on the nature of the habitats beyond the site boundary. The information gathered is used to provide a baseline to the habitat assessment.

3.2 Field Surveys

3.2.1 Personnel & Credentials

The following field surveys were undertaken by Claire Herlihy MSc on 19th May 2026. Claire Herlihy MSc is an Assistant Ecologist of Windrush Ecology Ltd and has been working as a professional ecological consultant since 2025.

3.2.2 UK Habitat Classification (UKHab) Survey

An Extended UKHab Habitat Survey was undertaken to determine the type and overall status of habitats within the site. The field survey technique used is detailed in the UK Habitat Classification User Manual (Butcher, Carey, Edmonds, Norton, & Treweek, UK Habitat Classification Manual Version 1.1, 2020).

Where possible, prior to carrying out the field survey, on-site habitats were identified using MAGIC website and Google Earth Pro satellite imagery. These sources were reviewed to identify an appropriate spatial resolution for habitat mapping, as the UKHab system has been designed to function at two scales: fine scale (25m² and 5m length) and large scale (400m² and 20m length). If a project requires the detailed mapping of small features and where habitats could be very fine grained, it is recommended that surveyors use the fine-scale MMU which is 25m² and 5m in length. Therefore, for the purposes of this survey it is considered that the fine-scale minimum mapping unit (MMU) is appropriate.

The MAGIC website and Google Earth Pro satellite imagery were also used to determine whether there are known or possible locations for rare and/or habitats of high nature conservation importance.

The UKHab system comprises a five-level Primary Habitat Hierarchy and a list of Secondary Codes, the latter is divided into Essential codes and Additional Codes. It is mandatory that each recorded habitat parcel (which can be a point, line or polygon using geospatial vector data terminology) is allocated a single Primary Habitat Code and to record the presence of all Essential Secondary Code features associated with that habitat parcel. Additional Secondary Codes can also be associated with habitat parcels, where it is relevant to the whole parcel. The UKHab system recommends that up to six Secondary Codes can be allocated to a single habitat parcel.

The UKHab system includes all habitat types identified in the UK, irrespective of scale and geographic range, including all habitats listed under Section 41 of the NERC Act 2006 and all Habitats Directive Annex 1 habitats recorded in the UK. Where possible, synonyms for UKHab habitats in other major habitat classifications are provided in the definitions.

The UK Habitat Classification Version 2.0 has been used (UKHab Ltd, 2023), with the use of Level 3 to 5 Primary Habitats and Secondary Codes. Primary Habitats and Secondary Codes follow the UKHab definitions listed in the aforementioned document. The Secondary Codes selected are appropriate to the site and habitats recorded.

Target notes were also prepared on features of particular ecological interest, and an assessment was made of the site's potential to support protected and notable species (such as species listed under Section 41 of the NERC Act 2006) as well as invasive species (listed on Schedule 9 of the Wildlife & Countryside Act 1981).

3.2.2.1 Summarised UKHab Metadata

In line with the UKHab User Manual Table 2 details the Survey Metadata associated with the UKHab survey.

Table 2. Survey Metadata associated with the UKHab survey.

Metadata Heading	Site Information
Scope and purpose of the survey	Baseline habitat survey to inform PEA and BNG Assessment
Area surveyed	0.31ha
Edition of UKHab used	Version 2.0
The Level of UKHab Primary Hierarchy used	Levels 3 to 5
Additional attributes recorded	Habitat condition and habitat management information where relevant

Metadata Heading	Site Information
Map projection and units	Ordnance Survey National Grid reference system (OSGB)
Year of survey	2026
Organisation and individual undertaking the survey	Windrush Ecology Ltd, Ms Claire Herlihy.
References for any existing datasets that have been used	Aerial photography and the MAGIC website

3.2.3 Ground Level Tree Assessment (GLTA)

Trees within the site were assessed for their potential to shelter roosting bats following Good Practice Guidelines (Collins, 2023). The survey was undertaken from ground level, with trees inspected for potential roost features, using binoculars as necessary.

Table 3. Potential roost features (PRFs) that may be used by bats (Collins, 2023)

PRFs Formed by Disease and Decay	PRFs Formed by Damage	PRFs Formed by Association
• Woodpecker holes • Squirrel holes • Knot holes • Pruning cuts • Tear outs • Wounds • Cankers • Compression forks • Butt rots	• Lightning strikes • Hazard beams • Subsidence cracks • Shearing cracks • Transverse snaps • Welds • Lifting bark • Desiccation • Fissures • Frost cracks	• Fluting • Ivy

The following criteria are used as guidelines for assessing the potential suitability of trees for bats (Collins, 2023):

Table 4. Criteria for the assessment of trees for roosting bats (Collins, 2023).

Suitability	Description of Roosting Habitats
NONE	Either no PRFs in the tree or highly unlikely to be any.
FAR	Further assessment required to establish if PRFs are present in the tree.
PRF	A tree with at least one PRF present. The definition of PRF types is below: PRF-I: PRF is only suitable for individual bats or very small numbers of bats either due to size or lack of suitable surrounding habitats. PRF-M: PRF is suitable for multiple bats and may therefore be used by a maternity colony.

Where the possibility that bats are present cannot be eliminated or evidence of bats is found during the PRA survey, then further surveys (such as PRF aerial inspection, winter hibernation, presence/absence and/or roost characterisation) are likely to be necessary if impacts on the roosting habitat (or the bats using it) are predicted.

In addition to the bat survey, the trees were checked for evidence of nesting birds including old birds' nests, bird droppings, feathers and eggs.

3.3 Limitations on Survey Data

All areas of the site were accessible and surveyed thoroughly and safely. There are considered to be no significant limitations on the survey data.

As with any survey undertaken on a certain date, the data presented within this report provide information at particular points in time and present a 'snap-shot' of the ecological status of the site. Ecosystems and species behaviour/activity are dynamic and can change over time.

Whilst this report presents a characterisation and evaluation of habitat and species status at the time of the study, it should not be taken as an exhaustive representation of the ecological status of the site either at present or into the future.

3.4 Biodiversity Net Gain Assessment

A Biodiversity Net Gain assessment was conducted using the Statutory Biodiversity Metric, published by Department for Environment, Food & Rural Affairs (July, 2025), to calculate the impact of the proposed development on the ecological value of the site. The calculation ascertains whether the proposals are likely to achieve a net gain in biodiversity, calculated as biodiversity (habitat, hedgerow and watercourse) units and percentage biodiversity (habitat, hedgerow and watercourse) units.

To effectively assess the impact of the proposals the habitats within the site were classified according to the habitat types given in the UKHab classification system (UKHab Ltd, 2023). Habitats were assessed for their condition and strategic significance according to the criteria given within the Statutory Biodiversity Metric User Guide and The Statutory Biodiversity Metric – Technical Annex 1: Condition Assessment Sheets and Methodology (Version 1.0.4) (Department for Environment, Food & Rural Affairs, 2024) through onsite visits and the interrogation of internet resources including MAGIC (www.magic.gov.uk) and Google Earth (www.earth.google.co.uk).

The areas of given habitats in both their current state and the proposed development were mapped using on site data, satellite imagery and QGIS software, with the resulting areas inputted into the Statutory Biodiversity Metric alongside strategic significance classifiers.

A site visit was undertaken by a suitably qualified ecologist to determine the habitats present on site, their location, size, condition and connectivity.

The principles of biodiversity net gain as set out in the Biodiversity Net Gain Good Practice Guidelines (CIEEM, IEMA & CIRIA, 2019) have been considered throughout this process as listed below:

- **Principle 1.** Apply the Mitigation Hierarchy
- **Principle 2.** Avoid losing biodiversity that cannot be offset by gains elsewhere
- **Principle 3.** Be inclusive and equitable
- **Principle 4.** Address risks
- **Principle 5.** Make a measurable Net Gain contribution
- **Principle 6.** Achieve the best outcomes for biodiversity
- **Principle 7.** Be additional

- **Principle 8.** Create a Net Gain legacy
- **Principle 9.** Optimise sustainability
- **Principle 10.** Be transparent

4 Results & Evaluation

4.1 Desk Study

4.1.1 Sites of Nature Conservation Importance

4.1.1.1 Statutory Sites

There are no statutory sites of international nature conservation importance within a 5km radius of the site. The closest site is Hartslock Wood SAC which is located approximately 14km to the north-west of the site.

There are no statutory sites of national nature conservation importance within a 1km radius of the site. The closest site is Stanford End Mill and River Loddon SSSI which is located approximately 3.6km to the south of the site.

The site is located within a Site of Special Scientific Interest Impact Risk Zone (SSSI IRZ) which includes the following categories:

- **Infrastructure:** Airports, helipads and other aviation proposals.
- **Air Pollution:** Livestock & poultry units with a floorspace > 500m², slurry lagoons > 750m² & manure stores > 3500 tonnes.
- **Combustion:** General combustion processes >50MW energy input. Including: energy from waste incineration, other incineration, landfill gas generation plant, pyrolysis/gasification, anaerobic digestion, sewage treatment works, other incineration/combustion.

4.2 Habitats

Photographs of the site are presented in Appendix 1. Appendix 2 illustrates the location of the site and provides an aerial photograph of the site within the surrounding landscape.

A baseline habitat plan is presented in Appendix 4. The UKHab codes for the habitats within the site are presented within Table 5.

Table 5. UKHab habitat codes for the site; habitat baseline.

Primary Code	Secondary Codes	Description
u1b5	-	Developed land; sealed surface (buildings)
u1c	-	Artificial unvegetated, unsealed surface
g4	-	Modified grassland
u1	510	Bare ground
h3h	-	Mixed scrub
g	200	Individual trees

4.2.1 Developed Land; Sealed Surface (buildings) (u1b5)

The site includes a number of storage container units used for storage.

4.2.1.1 Description & Assessment of the Storage Units

The storage container units within the site are constructed of steel framework and corrugated panels. There are no loft spaces or internal rooms within the units, and the units are located in a line along the north-western to south-eastern orientation within the site. All of the units are accessed through large metal doors to the south-western elevation of the unit block.

The storage units are assessed as having '**negligible**' potential suitability for bats (Collins, 2023). Roosting bats are considered to be absent.

The internal spaces of the storage units are not considered to be suitable for bats and there are no internal or external potential roost features.

Developed land; sealed surface is considered to be of **negligible** ecological value.

4.2.2 Artificial Unvegetated, Unsealed Surface (u1c)

A large portion of the site is comprised of artificial unvegetated, unsealed surface in the form of crushed stone, gravel and hard packed earth. This habitat type is located to the east of the site and is used for storage of cars and machinery.

Artificial unvegetated, unsealed surface is considered to be **negligible** ecological value.

4.2.3 Modified Grassland (g4)

To the north of the site is an area of modified grassland.

The grassland has an average of 6.25 vascular plant species per square metre and a sward height between 5-30cm. The grassland is dominated by grass species including perennial rye-grass *Lolium perenne* and cock's-foot *Dactylis glomerata*.

Herbaceous species within the grassland include common nettle *Urtica dioica*, common teasel *Dipsacus fullonum*, bristly oxtongue *Helminthotheca echinoides*, spear thistle *Cirsium vulgare*, meadow buttercup *Ranunculus acris*, yarrow *Achillea millefolium*, dandelion *Taraxacum officinale*, white clover *Trifolium repens*, forget me not *Myosotis arvensis*, oxeye daisy *Leucanthemum vulgare*, ribwort plantain *Plantago lanceolata* and curled dock *Rumex crispus*.

Within the grassland there are areas of physical damage and bare ground due to the storage of machinery and access with large vehicles leaving tyre ruts.

Modified grassland is considered to be of **low** ecological value.

4.2.4 Bare Ground (u1 – 510)

To the south of the site, close to the access, is an area of bare ground. This habitat parcel contains low density of vegetation, and the structure is unvaried. The majority of the habitat consists of unvegetated earth.

There are no invasive non-native plant species within the area of bare ground.

Bare ground considered to be of **negligible** ecological value.

4.2.5 Mixed Scrub (h3h)

To the east of the site is an area of mixed scrub comprised of dog rose *Rosa canina*, willow *Salix sp.* and bramble *Rubus fruticosus*. The dominated species within the scrub is bramble.

Mixed scrub does not meet the criteria of any habitats of 'principal importance'. However, the flowers within the bramble scrub provide a nectar source for insects and the fruit provides foraging opportunities for species such as insects, birds and small mammals. The scrub habitat also provides nesting opportunities to birds and shelter to species such as hedgehogs.

Mixed scrub is considered to be of **low** ecological value.

4.2.6 Individual Trees (g – 200)

Four individual trees are located along the north-eastern boundary of the site. Their precise location is noted on the UKHab baseline habitat plan presented in Appendix 4.

Since the trees are located within close proximity to hardstanding habitats, they are shown as being a 'urban' tree. The species and size of the trees within the site are included in Table 6 below.

Table 6. Individual trees at the site and their size.

Common Name	Scientific Name	Size	Number of Trees
Oak	<i>Quercus sp.</i>	Small (≤30cm DBH)	2
Oak	<i>Quercus sp.</i>	Medium (>30cm but <60cm DBH)	1
Oak	<i>Quercus sp.</i>	Large (>60cm but <90cm DBH)	1

The trees are considered to be of ecological value at the **site** level only.

4.3 Species

4.3.1 Plants

No rare or scarce plants were noted within the site. In particular, no rare or uncommon grassland or species are present within the modified grassland habitat.

4.3.2 Invertebrates

The habitats within the site are likely to support a common and widespread assemblage of invertebrates.

4.3.3 Amphibians

There are no ponds within the site, or adjacent to the site boundary, that amphibians could use for breeding. There are no ponds, as shown on Ordnance Survey maps or on the MAGIC website, within a 250m radius of the site.

The site is located within an Amber Risk Zone on the NatureSpace great crested newt impact risk map, meaning that the area is considered to contain suitable habitat and that great crested newts are likely to be present.

The site is not suitable for amphibians due to the presence of heavy machinery and lack of suitable shelter or nearby ponds. Although the modified grassland is varied in its sward height it is considered that amphibians, including great crested newts, are absent from the site during the terrestrial phase of their lifecycle.

4.3.4 *Reptiles*

The site is not considered to offer suitable habitat to common reptile species. The grassland offers no cover, shelter or protection to reptile species.

Reptiles are considered to be absent from the site.

4.3.5 *Birds*

The trees offer potential nesting habitat to bird species. This may include a number of species of 'principal importance' such as song thrush and may include birds of prey such as red kite and buzzard.

The grassland within the site is unsuitable for ground-nesting species, such as the skylark. This is due to the unsuitable structure of the grassland.

Nesting material was noted in the large oak tree to the north of the site.

4.3.6 *Bats*

4.3.6.1 *Bats & Habitats*

The modified grassland is considered to provide limited foraging for bats due to the fact that it is likely to support a common and widespread invertebrate assemblage.

4.3.6.2 *Bats & Trees*

The trees within the site are assessed as having 'NONE' suitability for roosting bats (Collins, 2023), and do not exhibit any potential bat roost features.

4.3.6.3 *Bats and Buildings*

All of the structures are assessed as having 'negligible' potential suitability for roosting bats (Collins, 2023).

4.3.7 *Other Mammals*

The grassland and mixed scrub habitats offer foraging opportunities to hedgehogs *Erinaceus europaeus*.

4.3.8 *Other Species*

No evidence of any other protected species was noted, and the site is not considered to offer any suitable habitat to other protected or notable species. No non-native, invasive plant species were noted.

5 Discussion

5.1 Relevant Legislative & Policy Guidance

5.1.1 *Bats*

As with many animal species within the UK, declines in the abundance and distribution of many bat species have been documented through recent decades. The reasons for these declines are various

and complex but it is considered that the major factors are changes in land use and agriculture, the loss of woodlands and hedgerows and the loss of suitable roosting sites.

Bats are particularly sensitive to human activity due to the fact that they roost within buildings, trees and underground structures such as mines, and the availability of suitable roost sites is considered to be a key factor in the conservation of bats within the UK. As a consequence, all species of bat and their roost sites are protected under the Wildlife and Countryside Act 1981 (as amended by the Countryside and Rights of Way Act 2000) and under The Conservation of Habitats and Species Regulations 2017. Taken together, these make it an offence to:

- (a) Deliberately capture or intentionally take a bat
- (b) Deliberately or intentionally kill or injure a bat
- (c) To be in possession or control of any live or dead wild bat or any part of, or anything derived from a wild bat
- (d) Damage or destroy a breeding site or resting place of such an animal or intentionally or recklessly damage, destroy or obstruct access to any place that a wild bat uses for shelter or protection
- (e) Intentionally or recklessly disturb any wild bat while it is occupying a structure or place that it uses for shelter or protection
- (f) Deliberately disturb any bat, in particular any disturbance which is likely
 - to impair their ability;
 - (i) to survive, breed, reproduce or to rear or nurture their young; or
 - (ii) in the case of hibernating or migratory species, to hibernate or migrate; or
 - to affect significantly the local distribution or abundance of the species to which they belong

A bat roost may be any structure a bat uses for breeding, resting, shelter or protection. It is important to note that since bats tend to re-use the same roost sites, current legal opinion is that a bat roost is protected whether or not the bats are present at the time.

Although the law provides strict protection to bats, it also allows this protection to be set aside (derogation) under The Conservation of Habitats and Species Regulations 2017 through the issuing of licences. Where a lawful operation is required to be carried out but which is likely to result in one of the above offences, a licence may be obtained from Natural England (the statutory body in England with responsibility for nature conservation) to allow the operation to proceed. However, in accordance with the requirements of The Conservation of Habitats and Species Regulations 2017, a licence can only be issued where the following requirements are satisfied:

- The proposal is necessary 'to preserve public health or public safety or other imperative reasons of overriding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment';
- 'There is no satisfactory alternative';
- The proposals 'will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range'.

These three criteria are often referred to as the 'three tests' of the Regulations. All three must be satisfied in order for a licence to be granted.

5.1.2 *Nesting Birds*

Nesting birds are protected under the Wildlife and Countryside Act 1981 (as amended), which makes it an offence to intentionally kill, injure or take any wild bird or take, damage or destroy its nest whilst in use or being built, or take or destroy its eggs. The nesting season for most species is between March and August inclusive.

5.1.3 *The Natural Environment & Rural Communities Act 2006*

Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 places a duty on the Secretary of State to publish, review and revise lists of living organisms and types of habitats in England that are of principal importance for the purpose of conserving English biodiversity.

It also requires the Secretary of State to take, and promote the taking of, steps to further the conservation of the listed organisms and habitats. This is important in the context of planning decisions as the National Planning Policy Framework affords planning policy protection to the habitats of species listed by virtue of Section 41.

There are no habitats listed within Section 41 of the NERC Act 2006 that are considered relevant to the site.

Species listed within Section 41 of the NERC Act 2006 that are considered to be potentially relevant to the site include:

- Bird species such as song thrush (trees provide potential nesting opportunities)
- Hedgehog (site offers potential foraging habitat and some shelter)

5.1.4 *The National Planning Policy Framework (NPPF)*

The National Planning Policy Framework was revised in response to the proposed reforms to the NPPF and other changes to the planning system consultation on 12th December 2024 and sets out the government's planning policies for England and how these are expected to be applied. This revised framework replaces the previous National Planning Policy Framework published in March 2012, revised in July 2018, updated in February 2012, revised in July 2021, updated in September 2023, and revised in December 2023.

The NPPF states that 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;
- 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.

Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

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.

When determining planning applications, local planning authorities should apply 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 integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

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 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 presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitat's 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.

5.1.5 *Environment Act 2021*

On 15th October 2019, the government introduced a new Bill to Parliament; The Environment Bill. This Bill was given Royal Assent on 9th November 2021 thereby passing the Environment Act 2021. This legislation will help ensure that England maintains and improves its environmental protection.

The Act details a legal requirement for all developments to ensure that a minimum of 10% net gain in Biodiversity is delivered. The Environment Act 2021 will help deliver the government's commitment to halt species decline by 2030.

Under the statutory framework for biodiversity net gain, subject to some exceptions, every grant of planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met ("the biodiversity gain condition"). This objective is for development to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the on-site habitat. This increase can be achieved through on-site biodiversity gains, registered off-site biodiversity gains or statutory biodiversity credits.

The biodiversity gain condition is a pre-commencement condition: once planning permission has been granted, a Biodiversity Gain Plan must be submitted and approved by the planning authority before commencement of the development. There are exemptions which disapply the condition from certain planning permissions, as well as special modifications for planning permissions for phased development and the treatment of irreplaceable habitats.

5.1.6 West Berkshire Local Plan Review 2023-2041

Policy SP11: Biodiversity & Geodiversity

Development proposals will be required to demonstrate how they conserve and enhance biodiversity and/or geodiversity including their long-term future management and, where required, deliver Biodiversity Net Gains.

Development will be permitted where it:

- a) Protects biodiversity and/or geodiversity value and implements appropriate conservation management. The degree of protection will be proportionate to the status of the site or species in terms of its international, national and/or local importance;*
- b) Avoids fragmentation and maximises opportunities for restoration, enhancements and connection of linear features which enables strong connectivity of biodiversity as part of an integrated habitat network (including links to habitats outside the District);*
- c) Incorporates beneficial biodiversity and/or geodiversity conservation features and enhances existing features, including those that will help wildlife to adapt to climate change where appropriate;*
- d) Provides or retains at least 10m buffer zones between development proposals and designated sites, habitats for protected or priority species or main rivers, which are informed by detailed site-based assessment;*
- e) Provides coherent ecological connectivity and permeability that is integrated and linked to the wider green infrastructure and any nature recovery network identified as relevant to the location;*
- f) Seeks to eradicate or control any invasive non-native species present on site; and*
- g) Is compatible with any Biodiversity Action Plan, Local Nature Recovery Strategy and /or other strategic conservation management plans for species or habitats that have been formally adopted by the Council.*

In addition to the above, where specific identified sites are to be affected the following will be taken into account:

Internationally Designated Sites

Development likely to result in a significant effect on an internationally designated site will be subject to assessment under the Habitats Regulations and will not be permitted unless it can be demonstrated that there are no alternatives following/through appropriate derogation tests for the proposal and that

any adverse effects on the integrity of the site can be fully avoided, mitigated and/or compensated and proposals are in the public interest.

Nationally Designated Sites

Development which is likely to have any adverse impact on the notified features of a nationally designated site will not normally be permitted. In exceptional circumstances, a proposal may be found acceptable where it can be demonstrated that:

- a) A suitable alternative site with a lesser impact than that proposed is not available;*
- b) The on-site benefits of the proposal clearly outweigh the impacts on the notified features of the site and where applicable, the overall site or habitat network;*
- c) All appropriate mitigation measures have been proposed and secured through the development management process; and*
- d) It does not prevent future attainment of nationally protected sites from meeting Favourable Condition, or to provide enhancements to enable the nationally designated sites to meet Favourable Condition as per their Conservation Objectives.*

Irreplaceable Habitats

Proposals which are likely to result in the loss or deterioration of an irreplaceable habitat (such as ancient woodland, ancient or veteran trees, ancient hedgerows, traditional unimproved meadows/ancient grasslands and lowland fens) will only be permitted for wholly exceptional reasons where:

- a) The need and benefits of the development in that location clearly and unambiguously outweigh the loss;*
- b) It has been adequately demonstrated that the irreplaceable habitat cannot be retained with the proposed scheme; and*
- c) Appropriate compensation measures are provided on site wherever possible and off-site where this not is feasible. The scale and quality of the compensation measures required will be commensurate to the loss or deterioration of the irreplaceable habitat and will be considered on a site by site basis, including long term management and maintenance.*

Sites of Local Importance

Development proposals affecting sites of local importance should always seek to contribute to their favourable management in the long term.

Where a proposal is likely to result in harm to sites of local importance (including habitats or species of principal importance for biodiversity, and sites that meet the criteria for designation as a Local Wildlife Site or designation as a Local Geological Site), developers will be required to accord with the following sequential approach:

- a) Firstly, seek an alternative site in the District with a lesser impact than that proposed;*
- b) Secondly, if the first is not possible, demonstrate mitigation measures can be taken on site; and*
- c) Thirdly, and as a last resort, seek appropriate compensation measures, on site wherever possible and off-site where this is not feasible including long term management and maintenance.*

5.2 Potential Impacts

5.2.1 Sites of Nature Conservation Importance

There are no foreseeable impacts on any statutory or non-statutory sites of nature conservation importance as a result of the proposals.

This is due to the distance of such sites from the area of proposed development, as well as the scale of the proposals which will only affect habitats within the site boundary and will have no foreseeable direct or indirect impacts on habitats within the wider area.

5.2.2 *Habitats*

There are no foreseeable impacts on habitats of 'principal importance'.

There are no foreseeable impacts on irreplaceable habitats.

The proposals will result in the loss of bare ground, developed land; sealed surface and a small area of modified grassland, habitats which are considered to be of negligible or low ecological value. The loss of these habitats will not result in a significant ecological impact.

The proposals include the creation of native hedgerows, modified grassland and mixed scrub planting.

All trees within the site are to be retained.

The Metric calculation shows the proposals will result in a Biodiversity Net Gain.

5.2.3 *Species*

5.2.3.1 *Plants*

There are no foreseeable impacts on rare plants.

5.2.3.2 *Invertebrates*

There are no foreseeable impacts on rare or protected invertebrates. Modified grassland is retained and created.

5.2.3.3 *Reptiles & Amphibians*

The proposed development is not predicted to result in any significant impacts on reptiles or amphibians, including great crested newts. This is due to the fact that these species are considered to be absent from the site.

5.2.3.4 *Birds*

There are no foreseeable impacts on bird species including ground-nesting bird species.

5.2.3.5 *Bats*

Loss of low ecological value habitats is unlikely to result in a significant loss of foraging habitats for the local bat populations. There are considered to be more suitable areas of habitat within the wider locality. The retention and creation of grassland is likely to provide an ecological enhancement for bats.

The survey indicates that roosting bats are absent from Carney Yard. No bats or evidence of bats were found during the daytime bat walkover survey.

Given the above, the proposed works are unlikely to result in any impacts on bats or places that bats may use for shelter or protection (roosts).

External lighting can have an impact on bats by affecting their activity and behaviour. Certain species of bat have been shown to be attracted to mercury vapour lamps which emit light over a very broad-spectrum including UV light to which insects are particularly sensitive. Insects can be attracted in large numbers to mercury lamps and so can bats of the genera *Nyctalus* and *Pipistrellus*, including

noctules *N. noctula* and common pipistrelles *P. pipistrellus* (Rydell and Racey, 1993). Lighting has shown to have an opposite effect on certain other species, such as the lesser horseshoe bat *Rhinolophus hipposideros*, which have been shown to avoid areas of artificial light (Stone *et al.* 2009).

New external lighting with the site could therefore have an adverse effect on foraging or commuting bats, partially foraging and dispersal behaviour along the site boundaries. Although disturbance by lighting is unlikely to result in significant impacts under the legal protection afforded to bats (and thus will not require a Bat Licence), lighting may result in a change in bat activity which is not desirable.

5.2.3.6 Other Species

There are no foreseeable impacts on other protected and notable species.

6 Biodiversity Net Gain Assessment

The Biodiversity Net Gain Assessment and calculation are presented below. The calculation is based on the UKHab Plan in Appendix 4 and the Proposed Habitat Plan in Appendix 5. See Appendix 8 for the biodiversity calculation (Statutory Biodiversity Metric).

6.1 Habitat Status Before Development

The existing habitats are presented in Table 7 below (please refer to Section 3 for a full description of habitats).

Table 7. UKHab baseline habitats.

Habitat UKHab	Total Area (ha)
Developed land; sealed surface	0.0411
Artificial unvegetated, unsealed surface	0.1023
Modified grassland	0.1404
Bare ground	0.0229
Mixed scrub	0.0057
Individual trees	0.0610

6.1.1 Habitat Condition Assessment

Habitat condition was assessed according to the criteria given within the Statutory Biodiversity Metric User Guide and Habitat Condition Assessment Sheets. The summary condition assessments for the habitats within the baseline can be found in Table 8.

The details of the habitat condition assessment can be found within the Habitat Condition Assessment Sheets in Appendix 7 of this report (separate Excel spreadsheet).

Table 8. UKHab habitats and condition assessment before development.

UKHab	Condition	Rationale
Developed land; sealed surface	N/A - Other	Fixed at N/A – Other.
Artificial unvegetated, unsealed surface	N/A - Other	Fixed at N/A – Other.

UKHab	Condition	Rationale
Modified grassland	Moderate	Passes 4 or 5 criteria including passing essential criterion A.
Bare ground	Poor	Passes 1 core criteria.
Mixed scrub	Poor	Passes 2 of fewer criteria.
Individual trees	Moderate	Passes 4 criteria.
Individual trees	Good	Passes 5 criteria.

6.1.2 Habitat Strategic Significance

The site is covered by the Berkshire Local Nature Recovery Strategy (LNRS). The Metric User Guide states that *“Once an LNRS has been published, the baseline strategic significance values for habitat parcels in that area should always be scored as low.”*

All post-development habitats are inputted as being ‘area/compensation not in local strategy/no local strategy’ and are of low strategic significance. This due to the site not being within an area of ‘potential measures’ for ecological enhancement with the LNRS.

6.2 Habitat Status After Development

The proposed development will result in the creation of new areas of modified grassland, mixed scrub and native hedgerow.

Please refer to Appendix 4 which contains a UKHab habitat plan of the proposed habitats showing all of these elements and to Appendix 6 for a plan which depicts areas of habitat that will be lost and retained.

The proposed habitat areas/lengths after development are presented in Table 9.

Table 9. On-site habitat areas/lengths after development.

Habitat/Hedgerow	Retained Area (ha)/Length (km)	New Area (ha)/Length (km)
Developed land; sealed surface	0.0298	-
Artificial unvegetated, unsealed surface	0.0661	0.01
Modified grassland	0.1372	0.0587
Mixed scrub	0.0055	0.0051
Individual trees	0.0610	-
Native hedgerow	-	0.067

6.2.1 Habitat Condition Assessment

The condition assessments for on-site habitats post-development are presented in Table 10. Please see Section 6.2 for specific management prescriptions.

Table 10. On-site expected habitat condition assessment post-development.

Habitat/Hedgerow	Condition Assessment	Justification
Developed land; sealed surface	N/A – other	Condition fixed within the Metric.
Artificial unvegetated, unsealed surface	N/A – other	Condition fixed within the Metric.
Modified grassland	Moderate	Passes 4 or 5 criteria including passing essential criterion A.
Mixed scrub	Poor	Passes 1 core criteria.
Individual trees	Moderate	Passes 4 criteria.
Individual trees	Good	Passes 5 criteria.
Native hedgerow	Moderate	No more than 4 failures in total, and does not fail both attributes in more than one functional group.

6.3 Biodiversity Metric Calculation Summary

The result of the Statutory Metric calculation is:

Total net unit change in habitats: +0.16 Habitat Units

Total net % change in habitats: +12.96% Habitat Units

Total net unit change in hedgerows: +0.22 Hedgerow Units

Total net % change in hedgerows: N/A

The Trading Rules are **satisfied**.

Based on current proposal plans, achieving biodiversity net gain within the site is considered possible.

Please refer to Appendix 8 (separate document) for full details of the Metric calculation.

7 Recommendations

7.1 Further Surveys

No further surveys are considered to be necessary at this stage.

7.2 Habitats

7.2.1 Protection of Existing Habitats

It is recommended that trees within the site are protected in accordance with British Standard 5837:2012, through the establishment of appropriate root protection zones and no machinery or site material will be placed within root protection zones.

7.3 Species

7.3.1 Birds

The clearance of any woody vegetation **should be undertaken outside of the bird breeding period, avoiding March to August inclusive**. If this is not possible, the vegetation should be checked for active nests prior to removal to confirm the absence of nesting birds. This will avoid impacts of damage and destruction to active birds' nests.

7.3.2 Bats

7.3.3 Bats

As previously discussed, a European Protected Species (bat) Licence is not considered to be necessary for works to proceed.

7.3.3.1 Timing

No timing constraints are considered necessary.

7.3.3.1.1 Lighting

It is recommended that external lighting is avoided within the site, unless it is necessary for reasons of security and safety. In particular, lighting should be avoided around any new bat roosting features and along the boundaries of the site.

The key in the first instance is to maintain or reduce existing light levels, and reduce blue content to protect the bat species present; this is in line with the mitigation hierarchy where impacts are avoided in the first instance by being planned out (Bat Conservation Trust, 2023).

If lighting is required, it should be kept at low level and at low intensity (Bat Conservation Trust, 2023 and Emery, 2008).

Light sources, lamps, LEDs and their fittings come in a myriad of different specifications which a lighting professional can help to select. However, the following should be considered when choosing luminaires and their potential impact on key habitats and features:

- All luminaires should lack UV elements when manufactured. Metal halide, compact fluorescent sources should not be used
- LED luminaires should be used where possible due to their sharp cut-off, lower intensity, good colour rendition and dimming capability
- A warm white light source (2700Kelvin or lower) should be adopted to reduce blue light component
- Light sources should feature peak wavelengths higher than 550nm to avoid the component of light most disturbing to bats (Stone, 2012)
- Internal luminaires can be recessed (as opposed to using a pendant fitting) where installed in proximity to windows to reduce glare and light spill
- Waymarking inground markers (low output with cowls or similar to minimise upward light spill) to delineate path edges
- Column heights should be carefully considered to minimise light spill and glare visibility. This should be balanced with the potential for increased numbers of columns and upward light reflectance as with bollards
- Only luminaires with a negligible or zero Upward Light Ratio, and with good optical control, should be considered
- Luminaires should always be mounted horizontally, with no light output above 90° and/or no upward tilt

- Where appropriate, external security lighting should be set on motion sensors and set to as short a possible a timer as the risk assessment will allow. For most general residential purposes, a 1 or 2 minute timer is likely to be appropriate
- Use of a Central Management System (CMS) with additional web-enabled devices to light on demand
- Only if all other options have been explored, accessories such as baffles, hoods or louvres can be used to reduce light spill and direct it only to where it is needed. However, due to the lensing and fine cut-off control of the beam inherent in modern LED luminaires, the effect of cowls and baffles is often far less than anticipated and so should not be relied upon solely.

8 References

- Bat Conservation Trust, 2023. *Bats and artificial lighting at night*. The Bat Conservation Trust, London.
- Collins, J., 2023. *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition)*. The Bat Conservation Trust, London.
- CIEEM. 2018. *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine version 1.3*. Chartered Institute of Ecology and Environmental Management, Winchester.
- Defra, 2024. *The Statutory Biodiversity Metric – Technical Annex 1: Condition Assessment Sheets and Methodology*. July 2024 (v1.0.2). Defra.
- Defra, 2024. *The Statutory Biodiversity Metric User Guide*. Defra. First published: February 2024 Last updated: July 2024.
- Emery, M., 2008. *Effect of Street Lighting on Bats*. Urbis Lighting Ltd., Anglia.
- Joint Nature Conservation Committee, 2012. *Bat Worker's Manual*. Joint Nature Conservation Committee, Peterborough, UK.
- Reason, P.F. and Wray, S., 2023. *UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats*. Chartered Institute of Ecology and Environmental Management, Ampfield.
- Rydell J. & Racey, P. A. 1995. *Streetlamps and the feeding ecology of insectivorous bats*. Recent Advances in Bat Biology Zool. Soc Lond Symposium abstracts.
- Stone, E.L., Jones, G., & Harris, S. 2009. *Street lighting disturbs commuting bats*. Current Biology 19:1-5.
- UKHab Ltd, 2023. *UK Habitat Classification Version 2.0* (<https://www.UKHab.org>).

9 Appendix 1. Photographs



Photograph 1. The site viewed from the west.



Photograph 2. The site viewed from the north.



Photograph 3. Modified grassland to the south-west of the site.



Photograph 4. Bare ground to the south of the site.



Photograph 5. Artificial unvegetated, unsealed surface.



Photograph 6. Storage units viewed from the north.



Photograph 7. Three oak trees located to the north-east of the site.



Photograph 8. Mixed scrub to the south-east of the site.

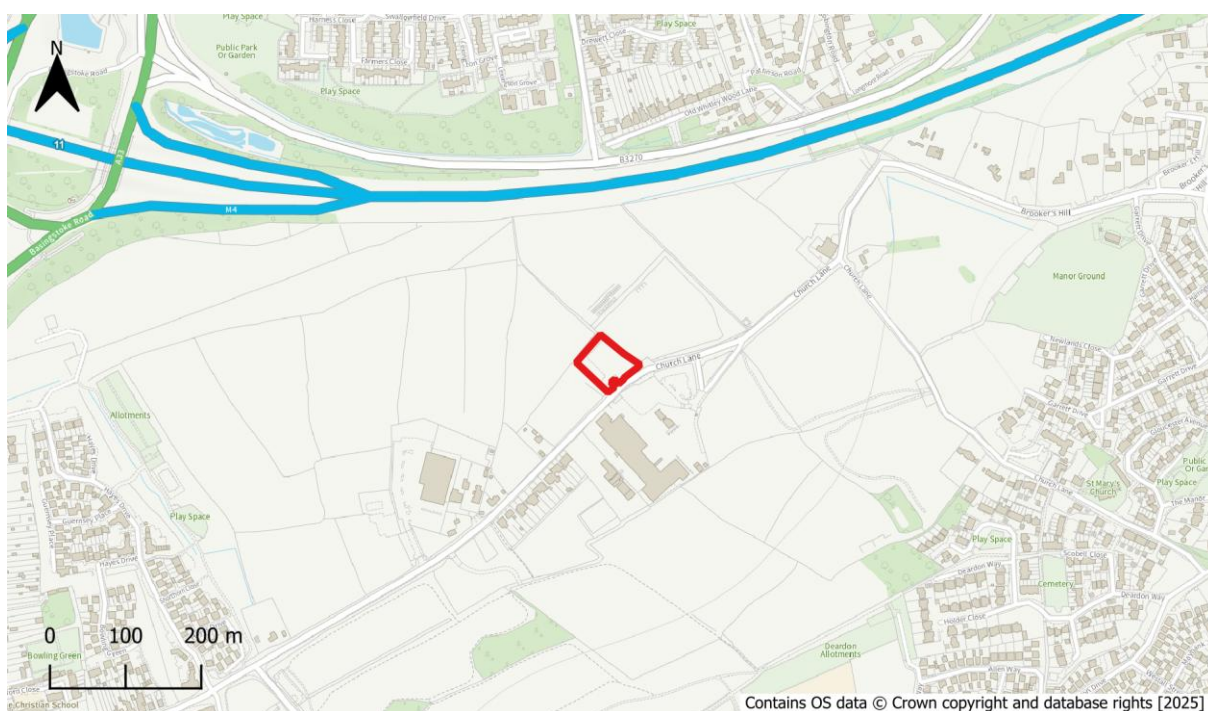


Photograph 9. Large oak tree to the north of the site.

10 Appendix 2. Site Location Plans

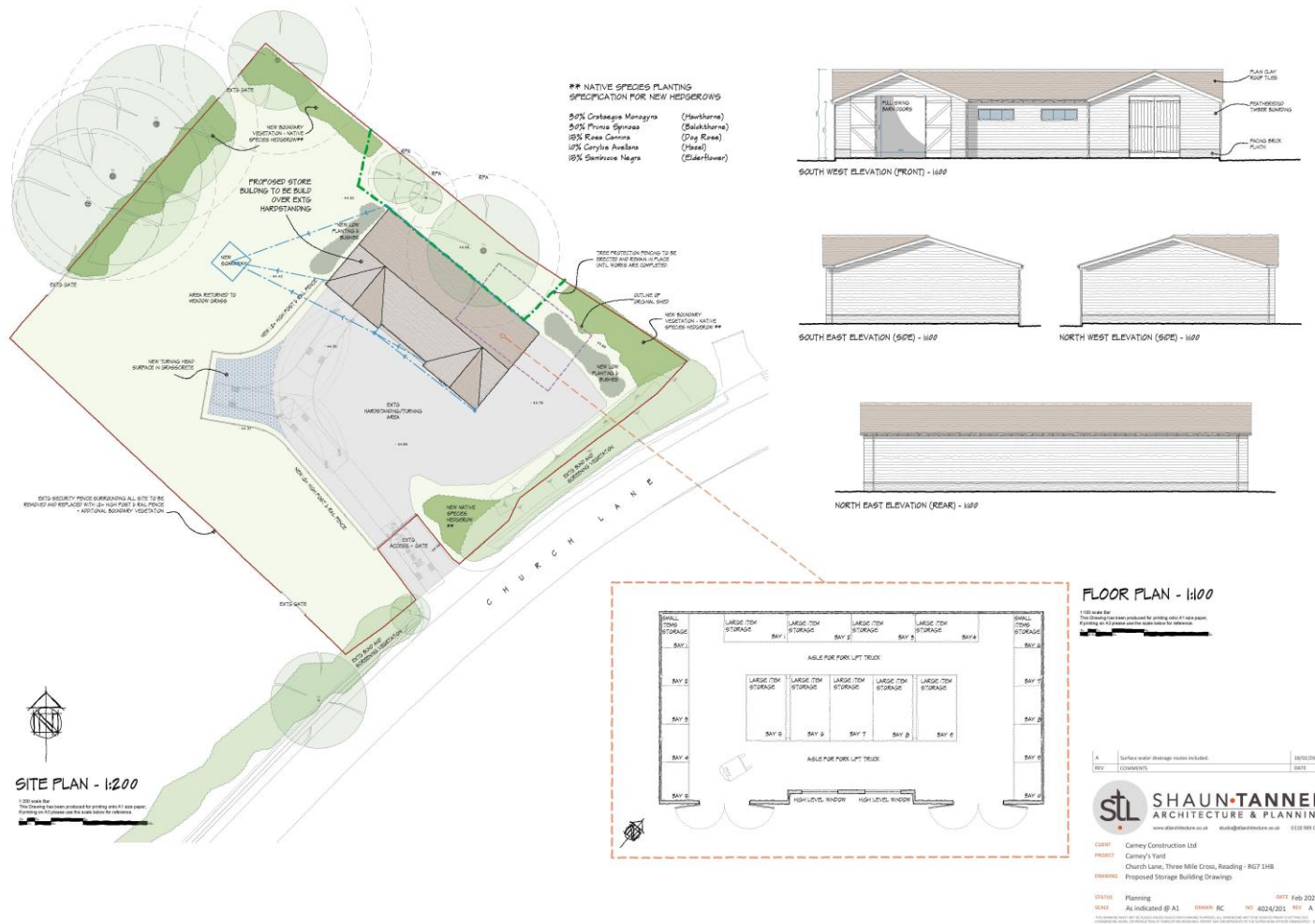


Aerial photograph showing the location of the site (outlined in red). Source: *Google Satellite*



Ordnance Survey map showing the location of the site (outlined in red) within the local area. Source: *OSM Standard*

11 Appendix 3. Proposal Plan



12 Appendix 4. Baseline UKHab Habitat Plan



13 Appendix 5. Proposed Habitat Plan



14 Appendix 6. Habitat Change Plan



15 Appendix 7. Habitat Condition Assessment Sheets

Please refer to separate Excel Spreadsheet.

16 Appendix 8. Statutory Biodiversity Metric

Please refer to separate Excel Spreadsheet.