



Ecological Surveys Ltd



Ecology - Arboriculture - BNG - Landscape

Ecological Impact Assessment (EclA)

Small scale Developments

Site Name

Lambs Farm Business Park

Site Location

Lambs Farm Business Park, Basingstoke Road, Swallowfield, RG7 1PQ

Survey Date

13 May 2026



Contract Details

Grid Reference	SU 71571 65378
What3Words	///gladiators.deed.agenda
Client	J P Winkworth Limited
Architect / Planning Consultant	Lasseter Downie
Date of Survey	13 May 2026
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Declaration of Compliance

BS 42020:2013

This study has been undertaken in accordance with British Standard 42020:2013 Biodiversity, Code of practice for planning and development, unless specifically stated otherwise.

Code of Professional Conduct

The information which we have prepared is true and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions

Validity of Survey Data and Report

The findings of this report are valid for 12 months from the date of survey, unless the site has been maintained in exactly the same condition, in which case the report can be considered valid for 24 months. Please be aware that some Local Planning Authorities (LPAs) require an update once 12 months has elapsed. If a planning application has not submitted within this period, an updated survey by a suitably qualified ecologist may be required.

An important caveat is that if Natural England Protected Species Licences are required, Natural England expect the survey data to be 'current year'. As protected species surveys have to be undertaken at specific times of the year this may not align with the build process. An example would be, a bat survey undertaken in the period May – September, will be 'current year' only, until the following May. After this time Natural England may require a further survey/s be undertaken. Consequently, Protected Species reports may be acceptable to the LPA, but not to Natural England. It is the clients' responsibility to monitor this and update surveys as necessary. A failure to do so may result in serious delays to the build programme.

Legal and Moral Constraints and Responsibilities Summary

An overview of relevant legislation and responsibility is given within the Appendices: Planning Policy and Legislation. Constraints exist for development where specific habitats or species are, or are potentially, within or adjoining a site proposed for development. Therefore, avoidance, mitigation, compensation and enhancement for a site will apply.



In all instances where Mitigation is given, also refer to:

- Any further survey work for protected species (Phase 2 Surveys) recommended, or their results.
- General Good Practice during Construction Stage.
- Law and Legislation pertaining to specific species (plants and animals)
- Prevention of the spread of native and non-native invasive plants and animals.
- Avoidance of Wildlife Crime <http://www.nwcu.police.uk/>

Further advice if species are found onsite during development may be sought from Ecological Surveys Ltd (Tel: 0800 888 6846 or 07736 458609) or Natural England: 0300 060 3900.





Table of Contents

WHAT IS AN ECOLOGICAL IMPACT ASSESSMENT (ECIA)?	7
NON-TECHNICAL SUMMARY	8
1. INTRODUCTION	10
1.1. SURVEY DETAIL	10
1.2. SURVEY AIMS	10
1.3. SITE LOCATION AND SIZE	10
1.4. PROPOSED DEVELOPMENT	10
FIGURE 1.1. LOCATION OF PROPOSED DEVELOPMENT	11
FIGURE 1.2. SITE LOCATION IN GEOGRAPHICAL CONTEXT	12
2. ASSESSMENT METHODOLOGY	13
2.1. STUDY AREA AND ZONES OF INFLUENCE	13
2.1.1. ESTABLISHING THE ECOLOGICAL BASELINE	13
2.1.2. DESKTOP SURVEY	13
2.1.3. FIELD SURVEY	14
2.2. METHOD FOR VALUATION OF HABITATS	14
2.2.1. ASSESSMENT	15
2.3. BIODIVERSITY NET GAIN (BNG) CONSIDERATIONS	19
2.3.1. BIODIVERSITY NET GAIN (BNG) WITHIN GARDENS	19
2.4. SURVEY CONSTRAINTS	20
3. LOCAL PLAN POLICIES	21
3.1. CORE STRATEGY POLICY CP1: SUSTAINABLE DEVELOPMENT	21
3.2. CORE STRATEGY POLICY CP3: GENERAL PRINCIPLES FOR DEVELOPMENT	21
3.3. CORE STRATEGY POLICY CP7: BIODIVERSITY	21
3.4. CORE STRATEGY POLICY CP8: THAMES BASIN HEATHS SPECIAL PROTECTION AREA	22
3.5. MDD POLICY CC03: GREEN INFRASTRUCTURE, TREES AND LANDSCAPING	23
3.6. MDD POLICY TB21: LANDSCAPE CHARACTER	23
3.7. MDD POLICY TB23: BIODIVERSITY AND DEVELOPMENT	23
3.8. MDD POLICY SAL05: DELIVERY OF AVOIDANCE MEASURES FOR THE THAMES BASIN HEATHS SPA	24
4. BASELINE ECOLOGICAL CONDITIONS	26
4.1. DESIGNATED SITES	26
TABLE 4.1. DESIGNATED SITES WITHIN 2KM STUDY ZONE	26
4.2. HABITATS	28
FIGURE 4.1. MAP SHOWING RESULTS OF FIELD SURVEY (UK HABITATS CLASSIFICATION)	28
4.3. DESCRIPTION OF ON-SITE HABITATS	29



4.3.1.	MODIFIED GRASSLAND	29
4.3.2.	NON-NATIVE AND ORNAMENTAL HEDGEROW.....	30
4.3.3.	OTHER DEVELOPED LAND	30
4.3.4.	BUILDINGS.....	31
TABLE 4.2. HABITATS OF PRINCIPLE IMPORTANCE/PRIORITY HABITATS WITHIN THE STUDY ZONE		31
4.4.	SPECIES - POTENTIAL FOR SPECIES OF NATURE CONSERVATION IMPORTANCE.....	32
TABLE 4.3. ASSESSMENT OF POTENTIAL FOR EUROPEAN PROTECTED SPECIES AND SPECIES OF NATURE CONSERVATION IMPORTANCE		32
5.	EVALUATION OF IMPORTANT ECOLOGICAL FEATURES (IEFS) & POTENTIAL IMPACTS.....	35
5.1.	IEF ASSESSMENT	35
5.1.1.	IEF – BATS	35
5.1.2.	IEF – NESTING BIRDS	36
6.	RECOMMENDATIONS FOR MITIGATION AND FURTHER SURVEYS	37
6.1.	MITIGATION	37
6.1.1.	ARTIFICIAL LIGHTING STRATEGY	37
6.1.2.	CONSTRUCTION EXCLUSION ZONES (CEZ)	38
6.1.3.	SEASONAL CONSTRAINTS FOR WORKS IMMEDIATELY ADJACENT TO BIRD NESTING HABITAT	38
6.1.4.	GENERAL IMPACT AVOIDANCE DURING THE CONSTRUCTION PHASE	39
7.	BIODIVERSITY ENHANCEMENT AND BIODIVERSITY NET GAIN.....	40
8.	ENHANCEMENT.....	40
8.1.	BIRD PROVISION.....	40
8.2.	GRASSLAND MANAGEMENT	41
8.3.	TREE PLANTING	41
9.	CONCLUSION.....	42
10.	REFERENCES.....	43
11.	APPENDICES	45
APPENDIX A. SUMMARY OF THE LEGISLATION AND POLICY RELATING TO HABITATS AND SPECIES		45
APPENDIX B. HABITATS REGULATION ASSESSMENT		50
APPENDIX C - BNG AND BNG EXEMPTIONS.....		50



What is an Ecological Impact Assessment (EcIA)?

An EcIA is a process of identifying, quantifying and evaluating potential effects of development-related or other proposed actions on habitats, species and ecosystems

The findings of an assessment can help competent authorities understand ecological issues when determining applications for consent. EcIA can be used for the appraisal of projects of any scale including the ecological component of Environmental Impact Assessment (EIA) – This Small-Scale version EcIA is not intended to be used as a chapter within an Environmental Impact Assessment (EIA)

The primary audience for an EcIA 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.

This EcIA report is written in a manner to support smaller scale developments, or developments taking place in locations which are not of high biodiversity value. This is in line with CIEEM guidance.

Differing Scales of EcIA and a Proportionate Approach

1.9 EcIA can be applied to projects of widely varying scales. The EcIA principles and process outlined in this guidance are relevant to all developments that may impact on ecological features – this term is used throughout to cover habitats, species and ecosystems. However, the level of detail required in an EcIA will inevitably be proportionate to the scale of the development and complexity of its potential impacts.

1.10 Scoping [...] should be proportionate to potential effects on ecological features. Professional ecologists need to use their knowledge and experience to judge the resources required to complete an adequate and effective EcIA.

1.11 Emphasis in EcIA is on 'significant effects' (see Box 3 in Appendices) rather than all ecological effects. Relevant legislation, regulations, plans and policies should be considered at an early stage, as these will have a bearing on the scope of investigations, how potential effects are interpreted, and the criteria needed for determining significance.

CIEEM (2018) *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine*. Chartered Institute of Ecology and Environmental Management, Winchester.



Non-Technical Summary

Purpose of the Report	To present the results of the Extended Phase 1 Habitat Survey undertaken at Lambs Farm Business Park hereafter referred to as ‘the Site’; assess the impacts of the proposed development on the Important Ecological Features identified; and detail applicable compensation, mitigation measures and biodiversity enhancements as appropriate.
Development Brief	Resubmission of a previously approved but now expired planning application for an agricultural building and associated parking.
Further Survey Work (Phase 2 Protected Species Surveys)	None required.
Further Assessment or Mitigation Method Statements	None required.
Habitat Regulation Assessment (HRA)	It is considered unlikely that the local planning authority (LPA) will request an HRA. However, this is not our decision to make.

Important Ecological Features (IEFs)

The presence of an IEF on site, or in a location which could potentially be impacted by the development or post development activities will need to be avoided, mitigated or compensated for.

IEF - Species	Habitats onsite are assessed as offering potential to support/sustain the following: ○ Nesting birds ○ Foraging and commuting bats
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The developer must avoid negative impacts under the Mitigation Hierarchy to the following habitats (and those which might also offer opportunity to protected wildlife species)

Avoidance Measures	- Seasonal Constraints for Works Immediately Adjacent to Bird Nesting Habitat - General Impact Avoidance During the Construction Phase
Mitigation Measures	- Artificial Lighting Strategy - Construction Exclusion Zones (CEZ)
Enhancement Measures	- Bird Provision - Grassland Management - Tree Planting

Biodiversity Net Gain

Background	The LPA have an obligation to ensure that all developments (unless exempted) result in a 'Net Biodiversity Gain (BNG)'. Consequently, even if there are no perceived negative biodiversity impacts, the developer might still have to provide some form of biodiversity enhancement. Biodiversity Net Gain (BNG) assigns a fixed value to residential gardens. Consequently, providing features such as ponds, scrub and hedgerows, whilst being very good for biodiversity, will not increase the BNG value. They should be considered for their benefit to wildlife as voluntary enhancements.
Is BNG Required for this Application?	BNG is Required for this Application. The associated metric and mapping are provided as separate documents.

Important Advisory	Ensure all onsite contractors/personnel are familiar with this report (and any Phase 2 reports associated with this site) and able to act upon the law and legislation governing protection of species and habitats onsite and mitigation specifically pertaining to this site. If protected species are discovered on site, <u>all works in the vicinity must cease immediately and ecological advice sought urgently.</u>
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1. Introduction

1.1. Survey Detail

Ecological Surveys Ltd were commissioned to undertake an Ecological Impact Assessment (EclIA) to assess the potential for legally protected and notable species on the Site, and to assess the potential impact of the development on the biodiversity of the Site and its immediate environs.

Ecological Surveys Ltd has not been informed of any previous surveys undertaken on this site that need to inform this report. Only habitats which are present on site or adjoining the site, are included and no discussion is entered into regarding habitats which are not present.

1.2. Survey Aims

The survey and this report identify features of conservation importance that could constitute a constraint to the proposals for this Site. Where appropriate, recommendations for impact avoidance, mitigation and post-development enhancement are made to ensure compliance with wildlife legislation and relevant planning policy.

This survey has been prepared in accordance with the *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine* produced by the Chartered Institute of Ecology and Environmental Management (CIEEM, 2018).

1.3. Site Location and Size

The Site comprises a small agricultural field, agricultural building and hardstanding access drive / parking, and is situated to the south of Reading. The Site location is indicated in Figures 1.1 and 1.2

The area surveyed is approximately 0.4ha in extent.

1.4. Proposed Development

The proposed works comprise the resubmission of a previous planning application for an agricultural building and associated parking. The works include construction of an agricultural building and conversion of much of the existing grassland to hardstanding/parking.

The layout of the proposed development is given in Figure 1.1



Figure 1.1. Location of Proposed Development

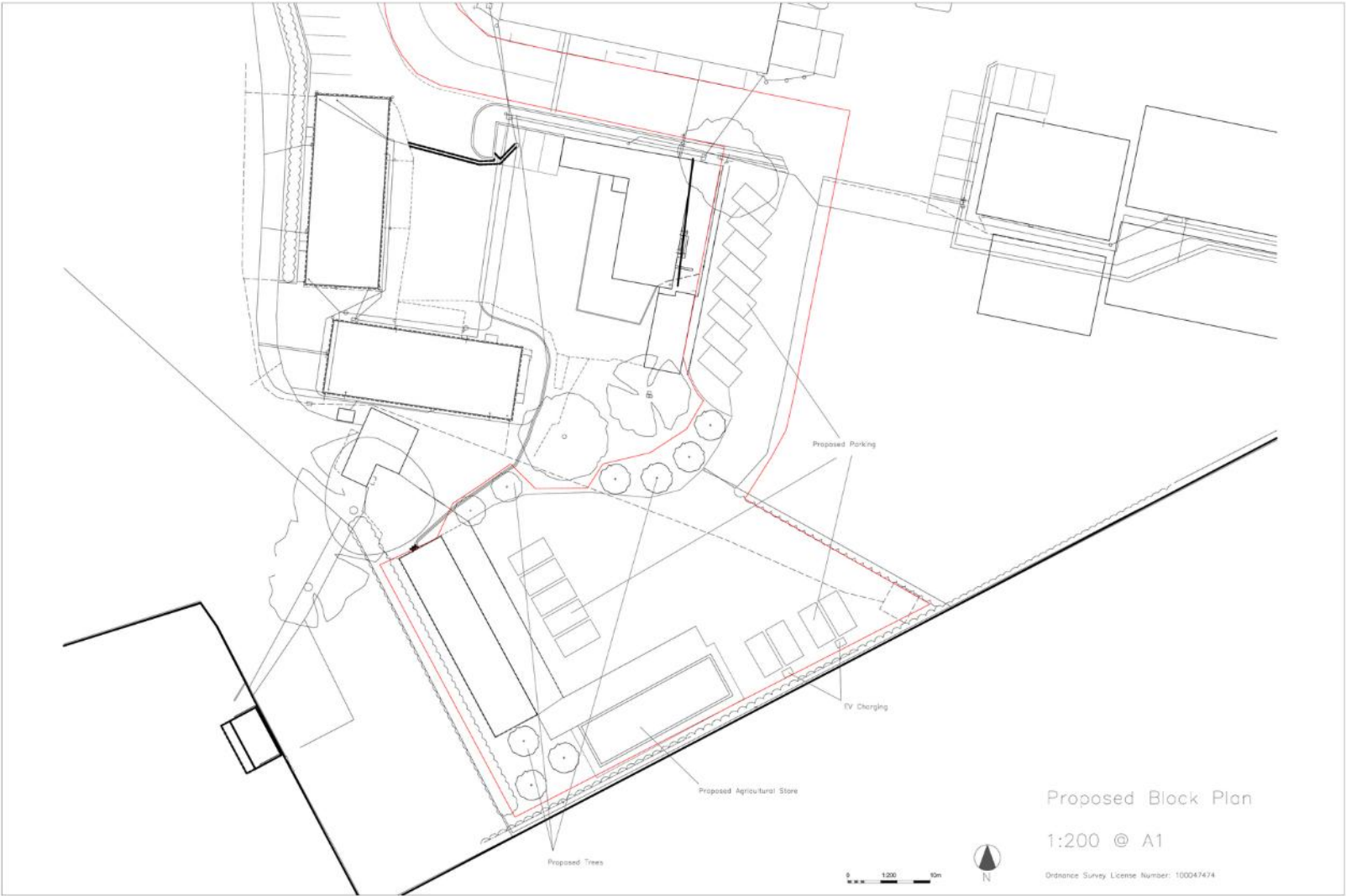
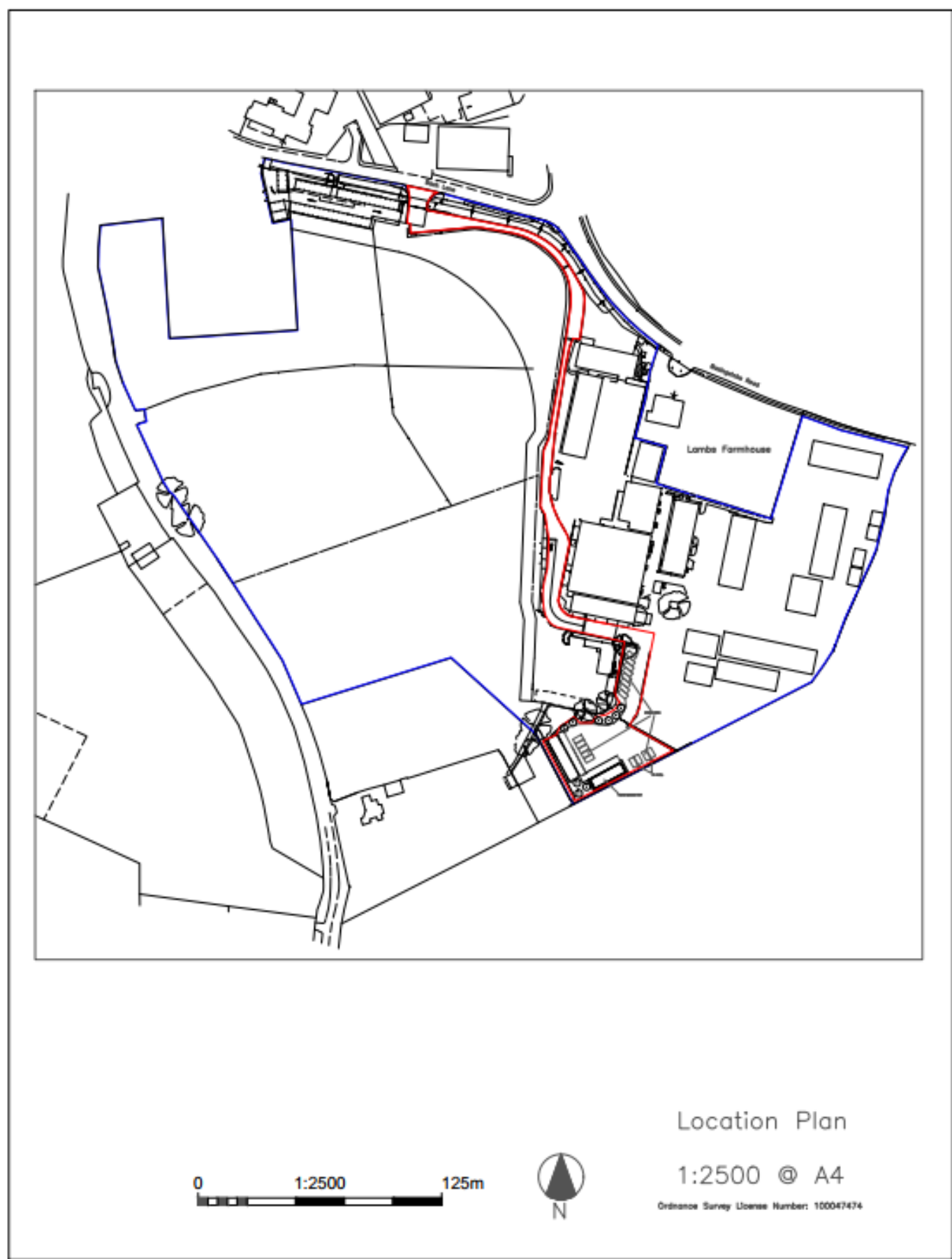


Figure 1.2. Site Location in Geographical Context



2. Assessment Methodology

This report assesses the ecological baseline by undertaking a desktop survey, drawing on existing information and data, and a field survey. Additionally, an initial evaluation of the impacts of the proposed development on the designated sites, habitats and species found both on the Site and in the immediate vicinity of the Site and the identification of measures to mitigate the impacts; and the identification of ways to enhance the biodiversity of the area.

2.1. Study Area and Zones of Influence

The study area has been defined as the application site and a 2km radius around it (the 'zone of influences'). The zone of influence is the 'area over which ecological features may be affected by biophysical changes as a result of the proposed project and associated activities' (CIEEM, 2018: 22). A 2km radius around an application site is generally accepted as the industry standard. Baseline information for this area was collated to determine ecological features that could potentially be affected by the development of the site, including designated sites, habitats and species. However, it is recognised that the zone of influence will vary for different ecological features depending on their sensitivity to an environmental change.

2.1.1. Establishing the Ecological Baseline

The ecological baseline for the proposed development site takes account of site-specific surveys, as well as existing ecological information relating to the site and its vicinity. Ecological baseline conditions are those 'which exist in the absence of proposed activities' (CIEEM, 2018: 26).

2.1.2. Desktop Survey

The desktop survey identified any statutory nature conservation sites that may be affected by the proposals. This comprises an important part of the assessment process, providing information on ecological issues that may not be apparent during the site survey.

A desk-top survey collated existing data for the following relating to both the Site itself and the area within a 2km radius.

- Statutory and non-statutory wildlife sites
- BAP Priority Inventory Habitats - Habitats of Principal importance
- Legally protected and nationally notable species

In compliance with the terms and conditions relating to its commercial use, the full desk study data is not provided within this report and only data specifically pertinent to this application have been included.



An assessment was then made of how the sites identified may be affected by the proposal, taking into account these relationships, and the species and/or habitat types for which the nature conservation site was chosen.

Websites consulted can be found in the References section.

In light of the habitats present within the Site, a biological records search was not commissioned as it was not considered appropriate for the scale and probable impact of the proposed development.

2.1.3. Field Survey

A field survey was undertaken on 13 May 2026 and the weather was showery.

The field survey included carrying out an Extended Phase 1 Habitat Survey, consisting of a walkover assessment of the Site using UK Habitat Classification methodology (UKHab Ltd (2023) UK Habitat Classification as amended). This is a standard technique for classifying and mapping British habitats. All areas within the Site were surveyed, the main plant species recorded, and habitat type mapped.

This is not a botany survey, and it is likely that not all plant species have been recorded, however Indicators of ecological value were also noted, including the presence or signs of any legally protected or rare species.

Plant species were identified according to Stace (2019).

A search was also made to identify the presence of any invasive non-native species (particularly those listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended)).

2.2. Method for valuation of habitats

The ecological value of habitats present is provided in line with Guidelines for Ecological Impact Assessment (CIEEM), and those which are important in terms of legislation or policy are identified.

The nature conservation value, or potential value, of the habitat is determined within the following geographic context:

- International importance (e.g. internationally designated sites such as Special Areas of Conservation, Special Protection Areas, Ramsar sites);
- National importance (e.g. nationally designated sites such as Sites of Special Scientific Interest or species populations of importance in the UK context);



- County importance (e.g. SNCI, habitats and species populations of importance in the context of the County in which the site is located);
- Local importance (e.g. important ecological features such as old hedges, woodlands, ponds);
- Negligible importance. Usually applied to areas such as built development or areas of intensive agricultural land.

The examples are not exclusive and are subject to further professional ecological judgment.

2.2.1. Assessment

All ecological data and information gained through both the desktop survey and the survey work were evaluated. The important ecological features were then identified and evaluated against the potential impacts/effects that the proposed development may have on the ecology of the Site and surrounding area.

The biodiversity importance of each designated site, habitat and species is evaluated on a geographic scale: international, national, county and local.

Evaluation of designated sites considers their designation; their ecological and landscape relationship with the proposed site; and the species and/or habitat types for which the site was designated.

Evaluation of habitats considers their designation; their area, quality and viability; diversity and connectivity to the wider landscape; and structural diversity and species-richness.

Evaluation of species considers their designation, including legal protection and rarity.

When assessing the impact of the development and changes to the baseline conditions on site, predictions will be made which focus solely on the zone of influence whilst taking into consideration the lifespan of the development and the significant impacts as identified from the proposed work operations throughout the lifespan of the development.

The proposed development aims to firstly avoid and then mitigate against any potential effects/impacts on the local ecology/biodiversity, ensuring compliance with nature conservation legislation. It aims to achieve this by applying the **mitigation hierarchy** (as mentioned in *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine*, CIEEM 2022)



Avoidance – Significant harm to wildlife species and habitats should be avoided through design where this is possible.

Mitigation – where significant harm cannot be wholly or partially avoided, it should be minimised by design, or by the use of effective mitigation measures that can be secured by, for example, conditions or planning obligations.

Compensation – where despite providing mitigation, there would still be significant residual harm. Compensation is a last resort and requires measures to provide for an equivalent value of biodiversity. To a large extent Compensation for lost or damaged habitats is considered through BNG. Where BNG is not a requirement for a development, the LPA will expect some form of compensation to be provided.

Appropriate measures to avoid and/or minimise the significant negative effects on the important ecological features have been identified. These mitigation measures aim firstly to avoid the overall effect/impact, or for those that cannot be avoided, reduce their overall effect value. It is not always possible to fully mitigate an adverse effect to neutral levels.

National Policy - National Planning Policy Framework the sets out the Government's planning policies for England and how these should be applied. It states that there is a presumption in favour of sustainable development and contains a number of policies relating to ecology including minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity and aid nature's recovery, including by establishing coherent ecological networks that are more resilient to current and future pressures.

Section 19, Conserving and enhancing the natural environment, includes the following two national decision-making policies directly linked to ecology:

N2: Improving the natural environment

1. To contribute positively to the natural environment, and support nature's recovery, development proposals should:
 - a. Consider the environmental qualities of land proposed for development, including habitats, landscape character and the natural beauty of the countryside, and identify opportunities for those qualities to be conserved or enhanced (including through requirements for biodiversity net gain where these apply);



- b. Take into account the quality of agricultural land (including that classified as best and most versatile agricultural land, and its grade), and if significant development of agricultural land is necessary, use areas of poorer quality land where possible;
 - c. Take suitable opportunities to connect to and strengthen ecological networks that extend beyond the site, drawing on the measures proposed by Local Nature Recovery Strategies, National Forest Strategies and Community Forest Plans, where present, and other relevant assessments;
 - d. Conserve and enhance existing natural features of visual, historic or nature conservation value (such as established trees and hedgerows) where possible; and use appropriate landscaping to help create a well-designed place and integrate the development into its surroundings;
 - e. Use green infrastructure provided as part of the scheme and nature-based solutions to secure multiple benefits: such as for biodiversity; surface water and pollution management (including maintaining flow rates and water quality); climate change mitigation and adaptation, and recreation;
 - f. Minimise any adverse impacts on biodiversity and include features which support priority or threatened species such as swifts, bats and hedgehogs. Development proposals should incorporate integrated nest boxes (commonly known as swift bricks) into their construction unless there are compelling technical reasons which prevent their use, or would make them ineffective; and
 - g. Ensure that green infrastructure and other features to support nature are located and designed to minimise risk of future failure, and that appropriate measures are in place for any necessary long-term management.
2. 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 the development should be refused.
3. Development proposals may incorporate biodiversity enhancements which exceed the statutory objective for biodiversity net gain, but this should only be a requirement where it is set out in up-to-date development plan policies for specific site allocations. Decision makers should not give weight



to other development plan policies which require biodiversity gains which go beyond the statutory framework, including where a policy requires gains for development proposals which are exempt.

N6: Areas of particular importance for biodiversity and geodiversity

1. To support the conservation of important habitats, species and sites of geodiversity value, development proposals affecting:

a. A site of international importance, which for the purpose of this policy is a habitats site, should be refused unless:

i. An appropriate assessment has concluded that the proposal will not adversely affect the integrity of the site (either individually or in combination with other developments), or the proposal can satisfy the derogation tests; and/or

ii. The impact of development on the relevant protected features of the protected site is being addressed through an Environmental Delivery Plan which has been made and the developer has committed to paying the nature restoration levy.

b. A site of national importance, which for the purpose of this policy is one designated as a Site of Special Scientific Interest, should only be supported if:

i. There would be no adverse effect (either individually or in combination with other developments) on the site's features of special scientific interest; or

ii. The benefits of the development in the location proposed clearly outweigh both the likely impact on the features of special scientific interest, and any broader impact on the national network of Sites of Special Scientific Interest; or

iii. The impact of development on the relevant protected feature of the protected site is being addressed through an Environmental Delivery Plan which has been made and the developer has committed to paying the nature restoration levy.

c. A site of local importance, which for the purpose of this policy is one designated as a Local Nature Reserve or identified as a local wildlife site, local geological site or equivalent in the development plan, should only be supported if:

i. There would not be a significant adverse effect on the integrity of the site; or



ii. The benefits of development in the location proposed clearly outweigh the likely impact on the features which make the site valuable for nature conservation.

2. Irrespective of a site's status in nature conservation terms, development proposals which would entail 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.

3. This policy applies to development on land inside or outside a designated area, if it would have an impact on the identified biodiversity or geodiversity value of the area concerned.

[Source NPPF 2026, Section 19.

Conserving and enhancing the natural environment, N1 – N6]

2.3. Biodiversity Net Gain (BNG) considerations

As of 12 February 2024, all planning applications are required to meet the mandatory minimum 10% biodiversity net gain (BNG) as set out by the Environment Act 2021, excepting some exemptions. Where required, the biodiversity net gain calculations, to determine the biodiversity losses and gains associated with the proposed development, have been undertaken using the Statutory Biodiversity Metric/Small Sites Metric. The statutory metrics use habitat to describe biodiversity, which is converted into measurable 'biodiversity units' according to the area of each type of habitat. The metric scores different habitat types (e.g. broadleaved woodland, modified grassland) according to their relative biodiversity value and adjusts this according to the condition and location of the habitat. Where new habitat is created or existing habitat is enhanced then the associated risks of doing so are factored into the metric.

It should be noted that the metric for biodiversity offsetting only considers habitats, both those currently present on site and those proposed as mitigation, compensation and enhancement for the proposed development. The metric does not take account of species onsite, or enhancements proposed to deliver biodiversity gain for species (except where they equate to gain in habitats).

2.3.1. Biodiversity Net Gain (BNG) within gardens

Biodiversity Net Gain (BNG) has a fixed value for residential gardens. Consequently, providing features such as ponds, scrub and hedgerows, (whilst being universally accepted as very good for biodiversity) will not increase the BNG value. They should still be considered for their benefit to wildlife, as voluntary enhancements.



Residential gardens having a fixed value in the BNG metric has the effect of achieving biodiversity gain targets, virtually impossible for developments within gardens. Consequently, the current BNG rules mean that unless the proposal is exempt from BNG, developments within a garden will always result in a BNG loss.

A similar conundrum occurs where new developments are proposed that includes private gardens, as only Public Open Space (POS) can be used to try and generate a biodiversity gain.

As developers and local authorities try to maximise the number of houses being built onsite it is very difficult if not impossible to achieve BNG onsite on the majority of smaller development sites.

2.4. Survey Constraints

All areas of the Site were readily accessible, and the time spent on site was considered appropriate to obtain all the details required for each habitat and species to enable an assessment to be made. Although some plant species would not have been visible during the survey period, the botanical diversity was considered sufficient to be able to classify and assess the habitats present, as well as their potential for supporting legally protected and notable species.

It should be noted that habitats, and the species they support, may change over time due to natural processes and because of human influence.

In line with current guidelines, the findings of this report are valid for 12 months from the date of survey, unless the site has been maintained in exactly the same condition, in which case the report can be considered valid for 24 months.

If a planning application has not submitted within this period, an updated survey by a suitably qualified ecologist is likely to be required by the LPA.

An important caveat is that if Natural England Protected Species Licences are required, Natural England expect the survey data to be 'current year'. As protected species surveys have to be undertaken at specific times of the year. An example would be, a bat survey undertaken in the period May – September, will be 'current year' only, until the following May. After this time Natural England may require a further survey/s be undertaken. Consequently, Protected Species reports may be acceptable to the LPA, but not to Natural England. It is the clients' responsibility to monitor this and update surveys as necessary. A failure to do so may result in serious delays to the build programme.



3. Local Plan Policies

The statutory development plan for Wokingham Borough includes the Wokingham Borough Core Strategy, adopted in January 2010, and the Managing Development Delivery Local Plan (MDD), adopted in February 2014. The policies relevant to ecology and nature conservation are summarised below.

3.1. Core Strategy Policy CP1: Sustainable Development

Policy CP1 establishes the overarching approach to sustainable development within the borough. Development is expected to maintain or enhance the high quality of the environment and avoid adverse effects upon environmental assets.

In ecological terms, the policy supports the protection of biodiversity, prudent use of natural resources and the integration of environmental considerations into the location and design of development. The proposed development should therefore demonstrate that ecological constraints and opportunities have been considered from the outset and incorporated into the scheme design.

3.2. Core Strategy Policy CP3: General Principles for Development

Policy CP3 sets out general criteria against which development proposals are assessed. Of particular relevance to ecology, proposals should maintain or enhance the ability of a site to support flora and fauna, including protected species.

The ecological surveys reported in this Ecological Impact Assessment have therefore been undertaken to identify habitats and species that could be affected by the proposed development. Where adverse effects have been identified, appropriate avoidance, mitigation, compensation and enhancement measures should be incorporated into the development.

3.3. Core Strategy Policy CP7: Biodiversity

Policy CP7 is the principal strategic biodiversity policy in the adopted Core Strategy. It seeks to protect sites, habitats and species of nature-conservation importance, with the level of protection reflecting their relative significance.

Development that may affect an internationally, nationally or locally designated nature-conservation site must demonstrate that the effects have been appropriately assessed. The policy requires development to avoid ecological harm wherever practicable. Where impacts cannot be avoided, adequate mitigation should be provided; compensation should be used where residual effects remain and can be satisfactorily addressed.



The policy also supports opportunities to maintain, restore and enhance habitats and populations of species of conservation importance. Accordingly, the proposed development should:

- avoid adverse effects on designated sites and other important ecological receptors;
- retain habitats of greatest ecological value wherever practicable;
- protect legally protected and priority species;
- maintain ecological connectivity within the site and with the surrounding landscape;
- mitigate unavoidable adverse effects;
- compensate for residual habitat losses where necessary; and
- deliver proportionate biodiversity enhancements.

3.4. Core Strategy Policy CP8: Thames Basin Heaths Special Protection Area

Policy CP8 addresses potential effects upon the Thames Basin Heaths Special Protection Area (SPA), particularly recreational disturbance arising from additional residential development.

The policy identifies a 400 m exclusion zone measured from the SPA boundary. Within this zone, new residential development is generally not permitted because effects such as recreational disturbance, fire, fly-tipping and domestic cat predation cannot normally be adequately mitigated.

Residential development within the relevant zone of influence is required to provide appropriate avoidance and mitigation measures. These normally comprise:

- the provision of, or a financial contribution towards, Suitable Alternative Natural Greenspace (SANG); and
- a contribution towards Strategic Access Management and Monitoring (SAMM).

These measures generally apply to net new residential development within 5 km of the SPA. They may also be required for proposals of 50 or more dwellings between 5 km and 7 km from the SPA. Any alternative bespoke mitigation must be demonstrated to be effective and agreed with Wokingham Borough Council and, where appropriate, Natural England.

The Site is approximately 3.5 km from the Thames Basin Heaths SPA. The proposed agricultural building would not provide residential or visitor accommodation and would not generate recreational pressure upon the SPA. Given the nature and scale of the development, its separation from the SPA and the absence



of other credible impact pathways, no likely significant effect upon the SPA is anticipated, either alone or in combination with other plans or projects. SANG and SAMM mitigation is therefore not considered necessary.

3.5.MDD Policy CC03: Green Infrastructure, Trees and Landscaping

Policy CC03 requires development to protect and enhance the borough's green-infrastructure network. Green infrastructure includes woodland, trees, hedgerows, grassland, river valleys, wetlands, ecological corridors, public open space, Sustainable Drainage Systems and other natural or semi-natural areas.

Development that would result in the loss, fragmentation or isolation of green infrastructure is considered unacceptable. Proposals should retain and strengthen existing green links and, where appropriate, create new habitat connections to the wider ecological network.

The policy is relevant to the retention and enhancement of features such as [woodland, mature trees, hedgerows, watercourses, ponds and other habitats present on or adjoining the Site]. The proposed development should incorporate these features into a connected green-infrastructure network, with suitable buffers and long-term management.

3.6.MDD Policy TB21: Landscape Character

Policy TB21 requires development to conserve and, where possible, enhance the character of the landscape. Although primarily a landscape policy, it is relevant to ecology where natural features—including woodland, trees, hedgerows, watercourses, field boundaries and other semi-natural habitats—contribute to both landscape character and ecological connectivity.

The development should retain characteristic landscape features wherever practicable and ensure that new planting and habitat creation are appropriate to the local landscape. Native species of local provenance should be used where reasonably practicable and appropriate to the intended habitat and future climate conditions.

3.7.MDD Policy TB23: Biodiversity and Development

Policy TB23 provides the principal detailed development-management policy for biodiversity within the MDD. It supplements Core Strategy Policy CP7 and applies to designated nature-conservation sites, important habitats, protected and priority species, wildlife corridors and opportunities for ecological enhancement.



Development proposals should be supported by sufficient ecological information to allow their likely effects to be properly assessed. Permission will only be granted where proposals appropriately address effects on nature-conservation interests.

The policy requires development to incorporate new biodiversity features and enhance existing ecological features. It also seeks to ensure ecological permeability through the protection and creation of continuous wildlife corridors that connect with the wider green-infrastructure network.

In responding to Policy TB23, the proposed development should:

- be informed by an appropriate ecological desk study and field surveys;
- identify designated sites, important habitats and protected or priority species that could be affected;
- avoid impacts through sensitive layout and design;
- retain and buffer important habitats and ecological features;
- provide appropriate mitigation for unavoidable construction and operational effects;
- compensate for residual habitat loss where necessary;
- maintain or improve habitat connectivity;
- incorporate new biodiversity features appropriate to the development; and
- secure the implementation, monitoring and long-term management of ecological measures.

Potential measures may include habitat creation and enhancement, native planting, strengthened hedgerows, woodland-edge buffers, species-rich grassland, ponds or other wetland features, wildlife-sensitive drainage, integrated bird and bat boxes, hedgehog-permeable boundaries and a sensitive lighting strategy.

3.8.MDD Policy SAL05: Delivery of Avoidance Measures for the Thames Basin Heaths SPA

Policy SAL05 identifies land allocated as Suitable Alternative Natural Greenspace (SANG) to mitigate increased recreational pressure on the Thames Basin Heaths Special Protection Area arising principally from new residential development.



The Site is located approximately 3.5 km from the SPA. The proposed development comprises an agricultural building and would not create residential or visitor accommodation or otherwise result in a material increase in recreational use of the SPA. Given the nature and scale of the proposal, no likely significant effect through recreational pressure is anticipated. SANG and Strategic Access Management and Monitoring contributions are therefore not considered necessary, and Policy SAL05 is not directly applicable to the proposed development.





4. Baseline Ecological Conditions

This section presents the findings from the site survey and desktop study. The information is presented in three distinct sections:

- Designated Sites
- Habitats
- Species

4.1. Designated Sites

Table 4.1 lists designated sites of international, national and local importance, along with their approximate distance from the proposed development.

Table 4.1. Designated Sites within 2km Study Zone

Designation	Name (as applicable)	Distance
Statutory Sites		
Special Protection Area (SPA)	Thames Basin Heaths	3.5km SE
Site of Special Scientific Interest (SSSI)	Stanford End Mill and River Loddon	400 m SE
Local Nature Reserve (LNR)	Swallowfield Meadow	1.2 km SE
Non-statutory Sites		
Site of Importance for Nature Conservation (SINC)	Loddon River (part)	~500 m E
	Woods Between Whitehouse and Highlands	~1km NW
	Norman's Shaw and Beech Hill Coverts	~1km W
	Priory Copse (proposed site)	~1km W
	Beaumy's Castle Wood and Moat	~1km W
	Clare's Green Road Grasslands	~1.5 km N
	Great Wood	~1.7 km E
	Highgrove Copse	~1.8 km S
	St Leger's Copse and Collin's Copse	~2km S



The Site lies within a SSSI Impact Risk Zone, but the type of development (residential) does not require Natural England to be consulted.

The Site is within the Zone of Influence for recreational pressure impacts to the Thames Basin Heaths SPA. Local Plan policy applies in this area regarding increased recreational pressure from new residential and tourism development on internationally protected sites. As this application is not residential and is sufficiently distant from the site, a Habitats Regulations Assessment (HRA) is unlikely to be required on this site. Albeit this is not our decision to make.

Refer to [Appendix D. Habitats Regulation Assessment \(HRA\)](#) for details.

Given the limited scope of works and distance from any designated sites, no designated sites are considered to be Important Ecological Features with regards to proposed works at this site.



4.2. Habitats

This section details the habitats present on the Site and recorded during the Extended Phase 1 Habitat Survey, along with important habitats within the vicinity of the site.

Figure 4.1. Map Showing Results of Field Survey (UK Habitats Classification)



4.3. Description of on-Site Habitats

4.3.1. Modified grassland



The field comprised species-poor, regularly managed grassland maintained through mowing and/or horse grazing. The sward was dominated by common and widespread species, including perennial rye-grass *Lolium perenne*, Yorkshire-fog *Holcus lanatus*, white clover *Trifolium repens*, dandelion *Taraxacum officinale* agg., daisy *Bellis perennis*, creeping buttercup *Ranunculus repens*, yarrow *Achillea millefolium*, oxeye daisy *Leucanthemum vulgare* and common ragwort *Jacobaea vulgaris*. The limited botanical diversity and regular management indicate that the grassland is of low ecological value. The habitat itself was assessed as having negligible suitability to support protected or notable species.

Habitat Summary		
Habitat	Importance in Geographical Context	Scoped <u>IN</u> or <u>OUT</u> as IEF
Modified grassland	Of Negligible importance for protected species and of low general ecological value.	OUT



4.3.2. Non-native and ornamental hedgerow



A regularly managed, single-species Leyland cypress *Cupressus × leylandii* hedge was present along the western and southern boundaries of the Site. The hedge provides a screening function for the business park but has no botanical diversity and is therefore considered to be of low ecological value. It nevertheless offers limited suitable nesting habitat for common breeding birds. No potential to support other protected or notable species was identified.

Habitat Summary		
Habitat	Importance in Geographical Context	Scoped <u>IN</u> or <u>OUT</u> as IEF
Leyland cypress hedge	Potentially of site importance for protected species (nesting birds)	OUT

4.3.3. Other developed land

Hardstanding extends from the Site entrance to the existing agricultural building. The track is unvegetated and subject to regular vehicle use. It provides negligible habitat for flora and fauna and is therefore considered to be of negligible ecological value.

Habitat Summary		
Habitat	Importance in Geographical Context	Scoped <u>IN</u> or <u>OUT</u> as IEF
Developed land; sealed surface	Of Negligible importance for protected species.	OUT



4.3.4. Buildings

An existing timber-clad stable/agricultural building was present in the western part of the Site. No potential bat roosting features were identified, and the building was assessed as having negligible suitability for roosting bats. Some suitable nesting opportunities for common birds were present internally and externally, although no nests were recorded at the time of survey.

Habitat Summary			
Habitat		Importance in Geographical Context	Scoped <u>IN</u> or <u>OUT</u> as IEF
Existing stable	timber-clad	Potentially of site importance for protected species (nesting birds)	OUT

Table 4.2. Habitats of Principle Importance/Priority Habitats within the Study Zone

Habitat	Distance from proposed development site	Comments and Importance in Context to the proposed development	Scoped <u>IN</u> or <u>OUT</u> as IEF
Wood-pasture and Parkland	140 m west	Of Negligible importance.	OUT
Traditional orchard	25 m west	Of Negligible importance.	OUT
Deciduous woodland	500 m south-west	Of Negligible importance.	OUT
Ancient Woodland	1 km west	Of Negligible importance.	OUT
Chalk Rivers	400 m south-east	Of Negligible importance.	OUT
Good quality semi-improved grassland	1.6 km north	Of Negligible importance.	OUT
Coastal and floodplain grazing marsh	600 m east	Of Negligible importance.	OUT



4.4. Species - Potential for species of Nature Conservation Importance

Habitats, both on and offsite, have been assessed from the results of the field survey and data search for their potential to support the following protected species. Where there is no potential for a species or species group to be associated with the site, or where habitats with the potential to support this species or species group will not be impacted by the proposals, they may be scoped out at this stage.

Table 4.3. Assessment of potential for European Protected Species and species of Nature Conservation Importance

Species	Assessment	Importance in Geographical Context	Scoped <u>IN</u> or <u>OUT</u> as IEF
Amphibians	Suitable riparian or terrestrial habitat is not associated with the Site. The site lies within a Naturespace Great Crested Newt Green zone. This combined with a lack of ponds within 250m and lack of suitable habitats on site, it is unlikely that great crested newts would be present. Records of great crested newt have been recorded within 2km. The nearest being approximately 700 m south-east of the Site	Negligible	OUT
European Badger <i>Meles meles</i>	Badger setts, foraging or commuting badgers are not evident within the Site.	Negligible	OUT
Bats	The desk study identified records of brown long-eared bat <i>Plecotus auritus</i> approximately 1 km from the Site, common pipistrelle <i>Pipistrellus pipistrellus</i> approximately 1 km south-east and soprano pipistrelle <i>Pipistrellus pygmaeus</i> approximately 1 km south-east. No potential roosting features were identified within the existing stable/agricultural building, which was assessed as having negligible suitability for roosting bats. Bats may occasionally commute across or forage over the Site; however, the habitats present are limited in extent and are considered to provide no more than low suitability for these activities.	Negligible (roosting) Negligible (foraging and commuting)	IN



Birds	The Leyland cypress hedge and existing stable/agricultural building provide suitable nesting opportunities for common bird species. No confirmed bird records were identified within the Site; however, nesting birds could be present during the breeding season.	Local	IN
Hazel Dormouse <i>Muscardinus avellanarius</i>	No records of hazel dormouse <i>Muscardinus avellanarius</i> were identified within or close to the Site. The regularly managed, single-species Leyland cypress hedge lacks the botanical diversity, structural complexity and range of seasonal food resources typically associated with suitable dormouse habitat. It is also poorly connected to suitable woodland or species-rich hedgerow habitat in the wider landscape. Hazel dormouse is therefore considered highly unlikely to occur within the Site, and no project-specific effects are anticipated.	Negligible	OUT
West European Hedgehog <i>Erinaceus europaeus</i>	No records of West European hedgehog <i>Erinaceus europaeus</i> were identified within or close to the Site. The regularly managed grassland and hardstanding provide limited foraging opportunities, while the absence of dense scrub, log piles, leaf litter and other suitable refuges limits the potential for resting, breeding or hibernation. Hedgehogs could occasionally pass through the Site, although regular management and poor connectivity to suitable habitat reduce this likelihood. The Site is therefore considered to have negligible suitability for sheltering hedgehogs and, at most, limited suitability for occasional foraging or movement.	Local	OUT
Reptiles	No records of reptiles were identified within or close to the Site. The regularly managed, species-poor grassland lacks the varied vegetation structure required to provide suitable opportunities for foraging, shelter and thermoregulation. The Site also lacks features such as tussocky grassland, scrub, rubble piles, log piles or other potential refuges and hibernation sites. Reptiles are therefore considered highly unlikely to occur within the Site, and no project-specific effects are anticipated.	Negligible	OUT
Eurasian Otter	There is no suitable riparian habitat associated with the Site.	Negligible	OUT



<i>Lutra lutra</i>			
European Water Vole <i>Arvicola amphibius</i>	There is no suitable riparian habitat associated with the Site.	Negligible	OUT
Notable invertebrates	Habitats at this site are likely to support common and widespread invertebrates with very little potential for notable species.	Negligible	OUT
Notable plants	Habitats within the Site provide little potential for notable or rare plants and they do not need to be considered further.	Negligible	OUT
Invasive non-native plants	There are no species present within the site which are listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended), as Invasive Non-native with respect to England and Wales.	Absent	OUT



5. Evaluation of Important Ecological Features (IEFs) & Potential Impacts

5.1. IEF Assessment

Important Ecological Features (IEFs) have been assessed in light of current nature conservation policy, planning policy and wildlife legislation by an experienced ecologist.

Where necessary, the IEF is named and an assessment of the potential effect of the proposed development on that IEF. If it is considered that the proposed development is likely to have no effect on features that have been identified as present, or potentially present, they may be scoped out at this stage.

If an IEF cannot be scoped out, mitigation will be detailed within the Mitigation Section below.

5.1.1. IEF – Bats

No potential bat roosting features were identified within the existing stable/agricultural building, which was assessed as having negligible suitability for roosting bats. No trees or other structures with potential roosting features would be affected by the proposed development. The proposal would therefore not result in the loss, damage or disturbance of a known or potential bat roost.

The species-poor grassland provides limited opportunities for foraging bats, while the regularly managed, single-species Leyland cypress hedge may provide a minor linear feature for occasional foraging or movement. These habitats are not considered to form an important foraging resource or commuting corridor within the wider landscape. The hedge will be retained, and the loss of managed grassland is unlikely to materially affect the availability or connectivity of habitat for bats.

Construction activity is expected to occur predominantly during daylight hours. Accordingly, noise, vibration and human activity during construction are unlikely to disturb nocturnally active bats. Any temporary task lighting required during construction could discourage bats from using adjacent habitats, although this effect would be localised and short-term.

Operational lighting represents the principal potential effect upon bats. Poorly designed external lighting could illuminate the retained hedge or other boundary vegetation, reducing its suitability for foraging and movement.

Consequently, an Artificial Lighting Strategy is required in order to maintain the limited opportunities available for commuting and foraging bats.



5.1.2. IEF – Nesting Birds

The Leyland cypress hedge and existing stable/agricultural building provide limited nesting opportunities for common bird species. Both features will be retained as part of the proposed development, and no direct loss of potential nesting habitat is anticipated.

Construction activity undertaken close to these features during the breeding season could temporarily disturb nesting birds through noise, vibration, increased human activity or the movement of machinery. In the absence of precautionary measures, such disturbance could result in the damage or abandonment of an active nest. This would constitute an offence under the Wildlife and Countryside Act 1981, as amended.

Works affecting or undertaken immediately adjacent to suitable nesting habitat should preferably take place outside the principal nesting period, generally March to August inclusive. Alternatively, a check could be made by a suitably competent ecologist shortly before works commence. If an active nest is identified, appropriate exclusion zones will need to be established and maintained until the young have fledged and the nest is no longer in use. Construction Exclusion Zones demarcated by Heras (or similar) fencing will prevent accidental damage.





6. Recommendations for Mitigation and Further Surveys

6.1. Mitigation

Where there is potential that vegetation management will have a significant effect on a valued ecological feature of nature conservation interest, recommendations for mitigation are made based on the mitigation hierarchy suggested in the *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine* (CIEEM 2022)

Avoidance – significant harm to wildlife species and habitats should be avoided through design.

Mitigation – where significant harm cannot be wholly or partially avoided, it should be minimised by design or using effective mitigation measures that can be secured by, for example, conditions or planning obligations.

Compensation – where, despite whatever mitigation would be effective, there would still be significant residual harm, as a last resort, this should be properly compensated for by measures to provide for an equivalent value of biodiversity.

6.1.1. Artificial Lighting Strategy

No external artificial lighting will be introduced to the site during the groundworks and construction phases of the development. External artificial lighting during the operational phase will comprise lights above external doors and street lighting.

- LED and/or low-pressure sodium lamps with glass glazing should be utilised instead of mercury or metal halide lamps. This type of lighting can be utilised more directionally and will reduce the range of light wavelengths emitted thus significantly reducing the levels of UV light which may attract increased levels of invertebrate bat prey items.
- Avoid artificial lights shining on known or potential bat roosts, their access points and their flight paths.
- Light ONLY when and where it is needed for health and safety.
- Prevent light-spill and spread. Eliminate bare bulbs, upward pointing lights, keep light near to or below the horizontal. E.g. flat cut-off lanterns. Such light should be positioned to only illuminate the required areas, limiting light spill, both horizontally and vertically. Additionally, hoods, cowls, louvers and/or shields may be utilised to further direct any lighting.



- When external lighting is needed for safety reasons, dynamic lighting schemes that are switched on only when needed should be considered. Dynamic lighting schemes are usually triggered via motion sensors by a pedestrian, bicyclist or cars.
- Timer switch on any proposed outdoor lighting to facilitate dark periods.
- Reduce height of lighting columns. Or allow for lower main beam angles to reduce glare.

6.1.2. Construction Exclusion Zones (CEZ)

Areas that are being retained should be protected from damage during the groundworks and construction phase of the development by erecting Heras (or similar) fencing around these features. The only exception to this is at existing access points. Heras fencing is not intended to restrict the access of species to other areas of the site, therefore, mindful procedure by site workers and visitors to the site is always necessary.

No development work should be undertaken within the CEZs and no materials, machinery, chemicals etc. should be stored within these zones. No development or any associated works should be located within these Construction Exclusion Zones.

Appropriate signs should be placed at regular intervals along the fencing to ensure everyone on site is aware of the CEZ and understands its relevance e.g. CONSTRUCTION EXCLUSION ZONE – NO ACCESS.

Any areas proposed for planting post-development should also be fenced off where possible to prevent compaction of the soil through vehicle movements.

6.1.3. Seasonal Constraints for Works Immediately Adjacent to Bird Nesting Habitat

Works involving larger machinery / vibration should be done outside of the bird nesting season of March – August (inclusive) where immediately adjacent to suitable bird nesting habitat.

If removal is not possible during this period, a supervised watching brief must be conducted by a suitably experienced ecologist prior to works commencing.

If breeding birds are found or suspected, clearance work will not be permitted until an ecologist is satisfied that breeding is complete, which may be as late as August or September.



6.1.4. General Impact Avoidance During the Construction Phase

All activities on site should bear in mind the potential for wildlife or the environment being harmed through the process of development from inception to end, with a proactive approach occurring for lawful protection of wildlife and the environment regarding use of materials, machines, chemicals, and human activity on site.

- Contractors must ensure that no harm can come to wildlife by maintaining the site efficiently, clearing away any material such as wire in which animals can become entangled and preventing access to toxic substances.
- Trenches or large excavations should be covered overnight to prevent wildlife such as badgers or hedgehogs falling in and failing to escape. If this is not possible then a strategically placed plank may provide a means of escape.
- Any large bore pipes should be capped at the end of the day to reduce the potential for badgers and other wildlife entering and becoming trapped.
- If there is a substantial delay before development commences, the site should be maintained in a way that would prevent wildlife colonising it and causing constraints in the future. Such management should include mowing grassland at least twice a year and preventing scrub encroachment.
- Piles of brush wood and or log piles should be carefully inspected for signs of wildlife prior to their removal. This is especially crucial during the period March – September (inclusive) as some species of bird choose such sites to construct their nests. Ideally removal of such features should be done outside of the nesting season. If this is not possible, it is recommended that these features are covered in such a way as to exclude / prevent birds and / or reptiles taking up residence. If nesting birds or reptiles are discovered, work must cease immediately with ecological advice sought.



7. Biodiversity Enhancement and Biodiversity Net Gain

The proposed development will result in the loss of an area of species-poor modified grassland. This loss will be compensated through the enhancement of retained grassland to modified grassland in good condition and the planting of nine native trees within the Site. As demonstrated by the accompanying Statutory Biodiversity Metric, these measures will offset the habitat units lost and deliver a minimum 10% biodiversity net gain.

The enhanced grassland and newly planted trees will be established and managed in accordance with an appropriate habitat management and monitoring plan to ensure that the target habitat types and conditions are achieved and maintained for the required period.

8. Enhancement

Enhancements are additional to any measures necessary to deal with potential impacts on site, as they are considered an opportunity to provide new benefits for biodiversity as a consequence of the proposals being implemented.

8.1. Bird Provision

New nesting opportunities could be provided for birds on the Site, through the provision of two nesting boxes built of long-lasting materials, suited to small passerine birds: boxes suitable include the Green & Blue bird block (Figure 1) which can be integrated or fitted externally with the addition of a fixing kit. These should be situated in a northerly/north-easterly facing aspect to the build.



ACO Polymer Build-in Bird Box

This compact bird box is designed to be built into a construction with standard bricks as it has a width of just half a brick, and height of a full length. The front of the box is designed to sit flush with the bricks with a small lip protruding at the top to act as a weather shelter, preventing rain from entering the box.

The box is made of polymer concrete which is completely freeze & thaw resistant, giving it a long lifespan. The front panel is removable to allow for maintenance (which should only be carried out when it is obvious that the box is empty). There are also two holes on the back plate for external mounting to walls, trees or poles, if necessary.

NHBS - <https://www.nhbs.com/>

8.2. Grassland Management

Grassland areas will be managed for wildlife, with some areas of long grass being left where possible. Grass cuttings will either be removed from the site and disposed of responsibly or be left in a pile on site, in an appropriate location, and not left where they fall. Having areas of different length grass produces a mosaic of different habitats within the site, thus benefiting invertebrates, birds and small mammals.

No artificial inputs, such as artificial pesticides and fertilisers, will be applied on site. This helps to maintain and improve the floristic diversity.

8.3. Tree Planting

9 no. mix of native trees, ideally of local provenance, will be planted in groups around the site. Tree species suitable for planting on site include silver birch *Betulus pendula*, downy birch *Betula pubescens*, rowan *Sorbus aucuparia*, field maple *Acer campestre*, bird cherry *Prunus padus*.



9. Conclusion

The field survey undertaken on 13 May 2026, in conjunction with the desk-based study, are considered to have collected enough information about the ecological condition of the site to have been able to adequately assess the impact of the proposed development.

Important Ecological Features were identified and evaluated against the potential impacts and effects that the proposed development might have on the ecology of the site and surrounding area. The impact assessment determined how the conditions, focusing on the Important Ecological Features identified, are likely to change in relation to the baseline conditions, allowing a clear understanding of the effects of the proposed development.

Avoidance, mitigation and compensation measures have been set out to avoid and reduce the effects/impacts of the development on the Important Ecological Features and the local environment as a whole. Enhancement measures for biodiversity have also been set out.

Providing the recommendations within this Ecological Impact Assessment (EcIA) are adhered to, with the mitigation measures and enhancements agreed between all relevant parties, it is considered, no ecological constraints exist which might prevent this development.

The local planning authority (LPA) will ensure that the mitigation measures, together with enhancement recommendations, are either conditioned where appropriate, or that full permission is withheld pending the agreement of mitigation, compensation (where necessary) and enhancement measures.

It is the responsibility of all those involved with the proposed development to ensure that wildlife protection and nature conservation legislation is complied with throughout the lifespan of the development, at every stage. Care should therefore be taken during all stages of the development and if any protected are discovered they must not be handled; works must stop immediately, and advice sought from a licensed ecologist.



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11. Appendices

Appendix A. Summary of the Legislation and Policy relating to Habitats and Species

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

This Act is the primary legislation that protects animals, plants and certain habitats in the UK. It is the means by which the Bern Convention and the Birds Directive and Habitats Directive are implemented in Britain. Protected birds, animals and plants are listed in Schedules 1, 5 and 8 respectively of the Wildlife and Countryside Act.

Schedule 1 Part 1 – Birds which are protected by special penalties at all times from being intentionally killed, injured, or taken and whose eggs, nests or dependent young are also protected from being disturbed.

Schedule 5 Section 9 Part 1 (killing/injuring) – Animals which are protected from being intentionally killed or injured.

Schedule 5 Section 9 Part 1 (taking) – Animals which are protected from being taken.

Schedule 5 Section 9 Part 4a – Animals which are protected from intentional damage to, destruction of, or obstruction of access to any structure or place used for shelter or protection.

Schedule 5 Section 9 Part 4b – Animals which are protected from intentional disturbance while occupying a structure or place used for shelter or protection.

Schedule 5 Section 9 Part 4c – Animals which are protected from their access to any structure or place which they use for shelter or protection being obstructed.



Schedule 6 - Animals which are protected from being killed or taken by certain methods under Section 11(1). The methods listed are: self-locking snares, bows, crossbows, explosives (other than ammunition for a firearm), or live decoys.

Schedule 8 – Plants and fungi which, subject to exceptions, are protected from: intentional picking, uprooting or destruction; selling, offering for sale, possessing or transporting for the purpose of sale; advertising for buying or selling.

Schedule 9 – Plant and animal species that are prohibited from introducing into the wild as they may cause ecological or environmental harm or where they pose a threat to the native habitats and species. Under Schedule 9 of the Wildlife & Countryside Act 1981 (as amended) it is a criminal offence to cause any of 48 non-native plant species (6/4/2010) and (non-native animals) to spread into the wild where they cause damage to the environment/ economy/health/lifestyle.

The site owner has a responsibility to:

- Prevent invasive, non-native plants on their land spreading into the wild and causing a nuisance.
- Prevent harmful weeds on their land spreading onto a neighbour's property

The owner of the site must not plant in the wild or cause certain invasive and non-native plants to grow in the wild. This can include moving contaminated soil or plant cuttings. If this occurs there is a fine or prison term for up to 2 years. The site owner is not legally obliged to remove these plants or to control them on site. However, at the point of change: **development, mulching, earth moving operations**: it is important that they are identified, and their spread controlled in the most appropriate way.

Environmental Protection Act 1990

[Environmental Protection Act 1990](#) allows for the potential classification of soil and other waste containing viable propagules of invasive non-native plant species as controlled waste. This has been applied to Japanese Knotweed with the result that waste containing this species must be disposed of in accordance with the duty of care set out in section 34 of the Act. The Environment Agency have issued guidance which will be of use in complying with the duty of care.

In addition:

- Any Schedule 9 plant material, or soil containing root or rhizome fragments, may be classified as 'controlled waste' under the Environmental Protection Act 1990 (EPA).
- In addition to a criminal prosecution under the Wildlife & Countryside Act, infringement of the EPA can result in an *unlimited fine*.
- The owner may also be held liable for costs incurred from the spread into adjacent properties and for disposal of contaminated soil off site during development, which later leads to the spread on another site.

Protection of Badgers Act 1992

Both badgers and their setts are protected, making it illegal to kill, injure or take, possess or cruelly ill-treat badgers or to interfere with a badger sett (including blocking tunnels or damaging the sett in any way).



The Hedgerow Regulations 1997

Any hedgerows classified as 'important' under the 1997 Hedgerows Regulations cannot be removed without a Hedgerow Removal Notice issued by the relevant Local Authority unless previously approved as part of a planning permission. The UK Biodiversity Action Plan (BAP) now classifies any native hedge over 20m in length as a priority habitat feature. Priority hedgerows should be those comprising 80% or more cover of any native tree/shrub species. The Local Authority is the arbiter as to classification of hedgerows.

The Countryside and Rights of Way (CROW) Act 2000

This Act increases measures for the management and protection for Sites of Special Scientific Interest (SSSI) and strengthens wildlife enforcement legislation.

Natural Environment and Rural Communities Act 2006

The Act made amendments to the both the Wildlife and Countryside Act 1981 and the Countryside and Rights of Way (CROW) Act 2000. For example, it extended the CROW biodiversity duty to public bodies and statutory undertakers. The Act also makes provisions in respect of pesticides harmful to wildlife, the protection of birds, and in respect of invasive non-native species, and also alters enforcement powers in connection with wildlife protection, and extends time limits for prosecuting certain wildlife offences.

Section 41 of the Act requires that the Secretary of State publishes a list of species of flora and fauna considered to be of principal importance for the purpose of conserving biodiversity in England. The list is intended to be used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under section 40 of the NERC Act 2006 'to have regard' to the conservation of biodiversity in England, when carrying out their normal functions. The list of species of principal importance was first published in 2002 by DEFRA under Section 74 of the Countryside and Rights of Way (CROW) Act 2000, and was identical to the UK BAP list at that time. The CROW Act Section 74 list has now been replaced by the Section 41 list. Sixty-five (65) habitats are listed as being of principal importance, in the Secretary of State's opinion, for the purposes of conserving biodiversity. Under section 41 (England) of the NERC Act (2006) there is a need for these habitats to be taken into consideration by a public body when performing any of its functions with a view to conserving biodiversity. These habitats are the subject of National and Local Biodiversity Action Plans.

The Anti-social Behaviour, Crime and Policing Act 2014

[Anti-social Behaviour, Crime and Policing Act 2014](#) enables community protection notices to be served by local authorities or the Police against individuals who are acting unreasonably and who persistently or continually act in a way that has a detrimental effect on the quality of life of those in the locality. These powers are designed to be flexible and could be used to address specific problems caused by widespread species such as Japanese knotweed.



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

The Conservation of Habitats and Species Regulations 2017 (and as amended by The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019)) originally transposed the Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (“the Habitats Directive”) and elements of Directive 2009/147/EC on the conservation of wild birds (“the Birds Directive”) in England, Wales, and to limited extent, Scotland and Northern Ireland. The objective of the Regulations is to protect biodiversity through the conservation of natural habitats and species of wild fauna and flora. The Regulations set out the rules for the protection, management and exploitation of such habitats and species. They place a duty on the Secretary of State to propose a list of sites which are important for either habitats or species. These sites are known generally as ‘European sites’ and in the UK form the national sites network (known in Europe as Natura 2000 sites). They include Special Areas of Conservation (SACs) and Special Protection Areas (SPAs).

Environment Act 2021

The Environment Act 2021 received Royal Assent on 9 November 2021. It only applies to England. Key elements of the Act include:

- All new developments to deliver 10% increase in biodiversity (biodiversity net gains), to be managed for at least 30 years (reviewable by the Secretary of State), with a Biodiversity Gain Site Register to be implemented and maintained for at least 30 years after the site scheme has completed.
- Introduction of Local Nature Recovery Strategies (LNRSs) – new spatial strategies led by a “responsible authority” in each area. Statutory guidance to be given to Local Planning Authorities (LPAs) explaining how they should take account of the LNRSs.
- Introduction of a new Species Conservation Strategy which places a duty on LPAs to cooperate with Natural England and other LPAs etc. to safeguard the future of ‘at risk’ species.
- LPAs to produce Biodiversity Reports every five years, describing action taken and the impact it has had on local biodiversity.
- Establishment of the Office for Environmental Protection (OEP), a green ‘watchdog’ to ensure the enforcement of the environmental legislation in England and Northern Ireland.
- Introduction of the five Principles to which organisations must have regard:
 - (i) Integration (environmental protection should be integrated into the making of policies);
 - (ii) Prevention (preventative action should be taken to avert environmental damage);
 - (iii) Precautionary (a precautionary approach should be taken to the possibility of environmental harm);
 - (iv) Rectification At Source (where possible any environmental harm should be rectified at source);
 - (v) Polluter Pays (the person(s) who causes the harm must suffer the financial penalty both in terms of mitigation and compensation)
- Long-term (at least 15 years, starting in 2022) legally binding targets on air quality, biodiversity, water, resource efficiency and waste reduction.



Circular 06/2005 Biodiversity and geological conservation – statutory obligations and their impact within the planning system

This circular provides administrative guidance on the application of the law relating to planning and nature conservation as it applies in England. It complements the national planning policy in the National Planning Policy Framework and the Planning Practice Guidance.

National Planning Policy Framework, 2026

The National Planning Policy Framework sets out the UK government's policies for plan making and for making decisions on development proposals in England. It is a material consideration of critical importance in both contexts. The objective of the policies in the 'Conserving and enhancing the natural environment' chapter (chapter 19) is to influence the design and location of new development to help drive nature's recovery and contribute to wider environmental outcomes, safeguarding our most important habitats, species and landscapes and recognising the centrality of natural capital to delivering sustainable growth. These policies include the national decision-making policies:

- N2: Improving the natural environment
- N3: Trees in new development
- N6: Areas of particular importance for biodiversity and geodiversity

Under NPPF, local planning authorities have an obligation to promote the preservation, restoration and recreation of priority habitats, ecological networks and the protection and recovery of priority species as identified under the Natural Environment and Rural Communities Act (2006).

The NPPF 2026 version replaces the first NPPF published in March 2012 and includes minor clarifications to the revised version published in 2018, 2019, 2021, 2023 and 2024.

European Red Data lists (IUCN, 2000)

International Union for Conservation of Nature (IUCN and the European Commission have been working together on an initiative to assess around 6,000 European species according to IUCN regional Red Listing Guidelines. Through this process they have produced a European Red List identifying those species which are threatened with extinction at the European level so that appropriate conservation action can be taken to improve their status.



Appendix B. Habitats Regulation Assessment

A Habitats Regulations Assessment (HRA) is a mandatory process in the UK to check if a plan or project (like new developments, policies) will significantly harm protected European wildlife sites (RAMSAR, SACs & SPAs), involving screening for likely effects, an in-depth Appropriate Assessment, and potentially derogation tests if impacts remain, ensuring legal compliance with nature directives. The goal is to avoid, mitigate, or compensate for adverse impacts on site integrity.

<https://www.gov.uk/guidance/habitats-regulations-assessments-protecting-a-european-site>
[Appropriate assessment - GOV.UK](#)

Where a Local Authority (LA) considers it necessary for and HRA and potentially an Appropriate Assessment (AA), the developers is required to undertake their own assessments and present the findings to the LA. The resultant assessment is called a shadow HRA as it is the responsibility of the LA to undertake the HRA.

Many Local Authorities, in their capacity as a Competent Authority, have undertaken surveys of the RAMSAR, SACs & SPAs within their region and formulated compensation structures, which developers pay to provide a fund which pays for the mitigation required to offset harm from activities which are adjudged to negatively impact the protected sites. In theory this negates the need for developers to provide individual shadow HRAs for separate sites. In practice the Local Authority reserves the right to require a sHRA

Appendix C - BNG and BNG Exemptions

In line with the Environment Act 2021, Local Planning Authorities (LPA) require suitable enhancements for wildlife within minor and major developments, with the aim of securing net gain.

There are however a number of BNG exempt development projects including:

- permitted development (homeowner applications),
- *de minimis*

The *de minimis exemption* is designed to cover planning permission for developments of such a small scale that no or minimal loss to habitat value is entailed. Two conditions must be met for this exemption to apply: firstly, the development must not impact an onsite priority habitat (defined as a habitat specified in a published list); secondly, the development must impact no more than 25 square metres of onsite habitat with a biodiversity value greater than zero, and no more than five metres in length of onsite linear habitat. Therefore, this exemption will apply depending on whether a habitat is impacted; a habitat being deemed to be impacted when it is lost or degraded in such a way that there is a decrease in the biodiversity value of that habitat (Regulation 4(b)). But a change of use application does require the provision of biodiversity net gain.

- Change of Use – (Caveated)
 - Change of use applications whilst therefore not exempt per se will usually fall under the *de minimis* exemption set out above. In most cases, where a change of use application is submitted the land in question is already developed and so any the habitat score will likely be zero and so no BNG is required.



Although the statutory BNG condition will not be required for most change of use applications, Planning Authorities and other stakeholders may still require lesser improvements in biodiversity to be made for change of use applications so local plan policy still needs to be checked.

- Self-build / Custom-build (see below)
 - Definition of Self-Build: The development must consist exclusively of dwellings that are self-built or custom housebuilding, as defined in Section 1 (A1) of the Self-build and Custom Housebuilding Act 2015. This means that individuals or groups must have primary input into the design and layout of the homes they are building for personal occupancy.
 - Size and Impact: The exemption typically applies to small-scale developments that do not significantly impact biodiversity. For instance, developments that do not affect priority habitats and have minimal impact on non-priority habitats (less than 25 square meters) may qualify.
 - Application Process: To apply for the exemption, developers must submit a Biodiversity Net Gain Statement Form, justifying how their project meets the self-build criteria. This includes a signed statement confirming that the occupants will have primary input in the design and layout. Additionally, a statutory biodiversity metric must be submitted to assess the pre-development biodiversity value of the site.
 - Legal Agreements: If a self-build property is sold or leased within three years of completion, the occupant may be required to secure off-site biodiversity net gain units, ensuring compliance with BNG objectives. Typically this is enforced with the use of a Covenant on the property, preventing a sale unless BNG has been retrospectively agreed and arranged. The approach taken varies between LPAs.
- s73a - Planning permission that has been granted retrospectively
 - s73 variation permissions where the original permission was granted before 12 February or the application for the original permission was made before 12 February

The LPA may still seek proportionate enhancements for wildlife from these developments.

Depending upon the LPA's requirements, this might include bat box/brick/tubes, bird boxes /bricks and bee bricks. If structurally inappropriate to the design, the use of alternative, but equivalent, wildlife features is possible

As of 6 August 2026, the following changes to BNG apply:

1. Development less than 0.2ha which does not impact priority habitat will be exempt from mandatory BNG.
2. The existing exemption for small scale self-build and custom-build development will be removed and will no longer apply.
3. Temporary planning permissions granted for a maximum of five years will be exempt from mandatory BNG.
4. For minor developments, offsite biodiversity gains are given the same preference as onsite habitat creation or enhancement within the biodiversity gain hierarchy