



EXTENDED PHASE 1 ECOLOGICAL ASSESSMENT  
AND BAT ROOST ASSESSMENT

RUSSELL HOUSE, BENTWORTH, GU34 5RB

FINAL REPORT

June 2021

## Report conditions

<i>Report title</i>	Extended Phase 1 Ecological and Bat Roost Assessment – Russell House, Bentworth		
<i>Client</i>	Mr and Mrs Fawcett		
<i>Report status</i>	Final		
<i>Survey date</i>	12 <sup>th</sup> May, 1 <sup>st</sup> June and 15 <sup>th</sup> June 2021		
<i>Written by</i>	Izabel Phillips	<i>Date</i>	15/06/2021

### *Disclaimers*

This report has been prepared by Phillips Ecology for the sole use of the client named above. Survey work, assessment, and report writing have been undertaken with all reasonable skill and care, and unless otherwise explicitly stated, is appropriate only for the work, scheme, or project brief provided by the client and intended purposes. The report may not be relied upon by any other party without the express agreement of the client and Phillips Ecology. No other warranty, expressed or implied, is made as to the professional advice included in this report.

Where data, drawings, plans or other technical information has been provided to Phillips Ecology for the purposes of preparation of this report, either by the client, their agents or other parties (including but not limited to biological data sets, laboratory results, and mapping), it has been assumed that the information is correct. No responsibility can be accepted by Phillips Ecology for inaccuracies in such data supplied by other parties.

No part of this report may be copied or duplicated without the express permission of Phillips Ecology and the client. Where field investigations have been carried out, these have been restricted to a level of detail required to achieve the stated objectives of the work, under standard limitations of access to third party land and other limitations as described in the report.

It is the client's responsibility to note and comply as necessary with any recommendations made in this report, planning conditions derived from these, and any relevant licensing regimes. Phillips Ecology bears no responsibility for any failure to note and comply with legal requirements for works carried out by or in behalf of the client at the above site and for the project this report has been produced to support.

## Executive Summary

- This extended phase 1 ecological and bat roost assessment report has been prepared in order to support a planning application for the proposed demolition of the existing house and the construction of a replacement dwelling at Russell House, Bentworth.
- An extended phase 1 ecological assessment of the application site was undertaken on the 12<sup>th</sup> May 2021 by Izabel Phillips.
- The survey area comprised the proposed construction footprint which comprised the existing dwelling and its surrounding garden. A data search extended to a 2km radius for designated sites and notable habitats.
- The site is considered to support opportunities for protected and priority species including bats and breeding birds. The existing dwelling is considered to support moderate suitability for roosting bats.
- Further survey work in accordance with Natural England standing advice and the Bat Conservation Trust's (BCT) Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edition) was required to confirm the presence/absence of roosting bats and finalise the proposed mitigation.
- Two presence/absence surveys comprising a dusk survey and a dawn survey were carried out during June 2021.
- The survey work has confirmed that the property supports occasional pipistrelle and brown long-eared bat day roosts.
- The demolition of the existing property will result in the loss of the identified bat roosts. As such, an EPSM licence will be required. The EPSM licence must be applied for at least six weeks before the proposed demolition is carried out.
- A mitigation strategy has been designed that would ensure the maintenance of the favourable conservation status of bats. In summary, this comprises the provision of replacement roost access/egress opportunities and the removal of roof materials by hand, under the supervision of a licenced bat worker.
- With the implementation of precautionary construction avoidance measures, impacts on further protected species will be avoided.
- Provided the recommendations set out in section 15 are followed, the planning authority can be confident that the development would accord with relevant planning policy, legislation and caselaw.

## Contents

<b>1</b>	<b>Introduction</b>	<b>5</b>
1.1	Report purpose	5
1.2	Description of proposal	5
1.3	Report context	5
1.4	Scope of assessment	5
1.5	Survey area	5
1.6	Limitations	5
<b>2</b>	<b>Data search</b>	<b>6</b>
2.1	Methodology	6
2.2	Limitations	6
2.3	Results	6
2.3.1	Statutory designated sites	6
2.3.2	Ancient woodlands	6
2.3.3	Priority habitats	6
<b>3</b>	<b>Habitats</b>	<b>9</b>
3.1	Methodology	9
3.2	Limitations	9
3.3	Existing records	9
3.4	Results	9
3.4.1	Poor semi-improved grassland (J1.2)	9
3.4.2	Introduced shrub (J1.4)	10
3.4.3	Intact Hedgerow	10
3.4.4	Buildings (J3.6)	10
3.4.5	Hard standing	10
<b>4</b>	<b>Protected and notable species assessment</b>	<b>12</b>
<b>5</b>	<b>Preliminary Bat Roost Assessment</b>	<b>12</b>
5.1	Methodology	12
5.2	Survey equipment	13
5.3	Limitations	13
5.4	Assessment methodology	13
5.5	Results	14
5.5.1	Building description relevant to bats	14
5.5.2	Site grounds description relevant to bats	16
5.6	Assessment	16
<b>6</b>	<b>Bat Emergence / Re-entry Survey</b>	<b>17</b>
6.1	Methodology	17
6.2	Surveyor/s	17
6.3	Survey area	17
6.4	Survey date	17
6.5	Survey equipment	17
6.6	Weather conditions	17
6.7	Results	18
6.7.1	Visit 1 – 1 <sup>st</sup> June 2021 – Dusk Emergence Survey	18
6.7.2	Visit 2 – 15 <sup>th</sup> June 2021 – Dawn Re-entry Survey	18
<b>7</b>	<b>Badgers</b>	<b>19</b>

7.1	Methodology .....	19
7.2	Limitations .....	19
7.3	Results .....	19
7.4	Assessment .....	19
<b>8</b>	<b>Dormice .....</b>	<b>19</b>
8.1	Methodology .....	19
8.2	Limitations .....	19
8.3	Results .....	19
8.4	Assessment .....	20
<b>9</b>	<b>Hedgehogs .....</b>	<b>20</b>
9.1	Methodology .....	20
9.2	Limitations .....	20
9.3	Results .....	20
9.4	Assessment .....	20
<b>10</b>	<b>Reptiles .....</b>	<b>20</b>
10.1	Methodology .....	20
10.2	Limitations .....	20
10.3	Results .....	20
10.4	Assessment .....	21
<b>11</b>	<b>Great Crested Newts .....</b>	<b>21</b>
11.1	Methodology .....	21
11.2	Limitations .....	21
11.3	Results .....	21
11.4	Assessment .....	22
<b>12</b>	<b>Breeding birds .....</b>	<b>22</b>
12.1	Methodology .....	22
12.2	Limitations .....	22
12.3	Results .....	22
12.4	Assessment .....	22
<b>13</b>	<b>Discussion and Assessment of Impacts .....</b>	<b>23</b>
13.1	Relevant legislation and policy .....	23
13.2	Designated sites .....	24
13.3	Habitats .....	24
13.4	Bats .....	24
13.5	Badgers .....	24
13.6	Hazel dormouse .....	24
13.7	Hedgehog .....	24
13.8	Reptiles .....	24
13.9	Great crested newts .....	25
13.10	Breeding birds .....	25
<b>14</b>	<b>Requirement for further surveys .....</b>	<b>26</b>
<b>15</b>	<b>Mitigation recommendations .....</b>	<b>28</b>
15.1.1	Licensing .....	28
15.1.2	Demolition mitigation strategy .....	28
15.1.3	Provision of new roosting sites .....	29
<b>16</b>	<b>Enhancements .....</b>	<b>31</b>
<b>17</b>	<b>Conclusion .....</b>	<b>31</b>
<b>18</b>	<b>References .....</b>	<b>31</b>

# 1 Introduction

## 1.1 Report purpose

This report has been prepared in order to present the extended phase 1 ecological and bat roost assessment undertaken for Russell House, Bentworth.

## 1.2 Description of proposal

The current proposal comprises a replacement dwelling with associated alterations to access, parking and turning space, and landscaping following demolition of existing dwelling, garage and storage buildings.

## 1.3 Report context

A planning application has been prepared for the demolition of the existing dwelling and the erection of a replacement dwelling. It is anticipated that the planning authority will request that the planning application is accompanied by ecological survey assessment work. Phillips Ecology have been instructed by the Applicant to undertake this assessment.

## 1.4 Scope of assessment

An extended phase 1 ecological assessment was carried out on the 12<sup>th</sup> May 2021. The survey comprised a field survey and desktop study in order to identify notable or protected sites, habitats or species potentially affected by the proposal under consideration. In addition, further surveys in the form of emergence and re-entry bat surveys were conducted during June 2021.

## 1.5 Survey area

The survey area comprised the proposed construction footprint which comprised the existing dwelling and its surrounding garden. A data search extended to a 2km radius for designated sites and notable habitats.

## 1.6 Limitations

Limitations which are specific to each phase of the assessment are given in the relevant sections, below.

## 2 Data search

### 2.1 Methodology

A desk-based assessment was undertaken by Phillips Ecology on the 1<sup>st</sup> June 2021 with Multi-Agency Geographic Information for the Countryside (MAGIC). The MAGIC database was consulted for records of statutory designated sites and priority habitats for the development site and a 2km radius.

### 2.2 Limitations

The data search results are bound by the following statement contained within MAGICs general disclaimer: *“The materials contained on this website are of a general, informational, nature. We have used reasonable endeavours to ensure the accuracy and completeness of the contents of the pages on this site but the information does not constitute advice and must not be relied on as such.”*

### 2.3 Results

#### 2.3.1 Statutory designated sites

No statutory designated sites are located within a 2km radius of the application site.

#### 2.3.2 Ancient woodlands

Seven compartments of non-statutory ancient woodland are located within a 2km radius of the application site. The closest are detailed in table 1, below.

**Table 1** Ancient woodlands within 2km of the application site

<b>Woodland Name</b>	<b>Approx. distance and direction from the site</b>	<b>Reason for designation</b>
<i>Childer Hill Copse</i>	1.0km E	This 1.2ha site is designated for its ancient and semi-natural woodland.
<i>Unnamed</i>	1.3km E	This 0.9ha site is designated for its ancient and semi-natural woodland.
<i>Gaston Wood</i>	1.3km W	This 4.8ha site is designated for its ancient and semi-natural woodland.
<i>Collier's Wood</i>	1.4km S	This 5.0ha site is designated for its ancient and semi-natural woodland.

#### 2.3.3 Priority habitats

The data search revealed the following priority habitats within 2km of the application site:

- Broadleaved woodland
- Wood pasture and parkland

## 3 Habitats

### 3.1 Methodology

A field survey was carried out on the 12<sup>th</sup> May 2021 by Izabel Phillips (bat licence ref: 2015-11750-CLS-CLS, dormouse licence ref: 2016-19512-CLS-CLS, GCN licence ref: 2015-16928-CLS-CLS). During the survey, all broad habitat types were identified and a list was compiled of characteristic plant species within each habitat type. These habitats are described below in accordance with Phase 1 habitat terminology.

### 3.2 Limitations

The habitat survey was carried out during May which is the optimal period for recording vascular plant species. Therefore, it was possible to identify vegetation to effectively classify habitat types in accordance with Phase 1 habitat terminology and no limitations were encountered.

### 3.3 Existing records

The data search revealed that priority habitats associated with the local landscape within 1km of the site comprise broadleaved woodland and parkland. With the exception of arable farmland, broadleaved woodland dominates the local area beyond the application site.

### 3.4 Results

The following Phase 1 habitat types were recorded within the application site.

#### 3.4.1 *Poor semi-improved grassland (J1.2)*

The existing property is situated within an area of managed lawn which is mown to a short sward (Figure 1). Perennial rye-grass *Lolium perenne*, red fescue *Festuca rubra* and common bent *Agrostis capillaris* dominate the grassland though a number of herbaceous species were recorded including yarrow *Achillea millefolium*, creeping buttercup *Ranunculus repens*, black medick *Medicago lupulina* and dandelion *Taraxacum officinale*.



**Figure 1** – managed lawn within the rear garden



### 3.4.2 *Introduced shrub (J1.4)*

The garden supports a number of introduced shrub species which are arranged around the lawn and property. A number of large and well-managed shrubs are present within the garden. These include two fruit trees which will be lost to the development (Figure 2).



**Figure 2** – one of two fruit trees that will be lost to the development

### 3.4.3 *Intact Hedgerow*

Stretches of intact beech *Fagus sylvatica* hedgerows subdivide the garden. A short section of the western dividing hedgerow will be lost to the proposal (Figure 3).



**Figure 3** – beech hedgerow to the west of the property

### 3.4.4 *Buildings (J3.6)*

The application site contains two built structures: the house and the outbuilding. These structures are described further in section 5.

### 3.4.5 *Hard standing*

Hardstanding in the form of a patio and a gravel driveway are associated with the main dwelling.

## 4 Protected and notable species assessment

The scope of works, data search and habitat assessment have informed the scope of the protected and notable species assessment. On this basis, the following protected and priority species have been considered further within this report:

- Bats
- Hedgehogs
- Badgers
- Breeding birds
- Reptiles
- Amphibians

The surveyed site has been assessed for its potential to support the above- named protected species based upon the criteria in Table 2.

**Table 2** Protected species grading criteria

<b>Grading criteria</b>	<b>Justification</b>
<i>Negligible</i>	Site is entirely unsuitable for species. Presence of species highly unlikely.
<i>Low Potential</i>	Minimal suitable habitat present or, if present, highly degraded/fragmented. Minimal linkage to suitable habitat beyond site. Presence of species unlikely.
<i>Moderate</i>	Presence of some suitable habitat features for species. Surveyed site within/close to known range or known occurrence but factors such as isolation/fragmentation may reduce potential. Presence of species is more likely than not.
<i>High</i>	Presence of optimal habitat features for species. Surveyed site within known range/close to known occurrence. Excellent connectivity to optimal habitat. No justification for discounting presence of species.
<i>Confirmed presence</i>	Species confirmed on site through direct sighting, presence of field signs (e.g. scat, hair, prints, nest, eggs, habitation etc.) or through desk-based assessment.

## 5 Preliminary Bat Roost Assessment

### 5.1 Methodology

The survey did not depart from the Bat Conservation Trust’s (BCT) Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edition) which states that “A preliminary roost inspection survey is a detailed inspection of the exterior and interior of a

structure to look for features that bats could use for entry/exit and roosting and to search for signs of bats”.

The external features of the built structures which will be modified by the proposed works in such a way that bats or their roosts could be impacted (directly or indirectly) if present, were systematically inspected in detail to compile information on potential and actual bat access points and roosting places such as lifted or broken tiles, loose brickwork and open eaves. This included a thorough search for evidence of bat activity such as bat droppings, urine splashes and fur staining.

The interiors of the built structures were inspected in order to identify potential or actual access points and roosting places and to record any evidence of bat activity or bats themselves.

## 5.2 Survey equipment

Survey equipment comprised:

- High-powered torch
- Camera
- Ladders
- Endoscope

## 5.3 Limitations

It was not possible to access the loft space within the annex at the time of the survey due to the presence of a highly active honeybee nest. All remaining internal and external areas of the building was accessible.

## 5.4 Assessment methodology

The suitability of the buildings for supporting bat roosts will be assessed against the guidelines within Table 3 which have been adapted from the BCT Good Practice Guidelines.

**Table 3** Suitability assessment guidelines

<b>Suitability</b>	<b>Description of Roosting Habitats</b>
<i>Negligible</i>	Structure has no reasonable likelihood of supporting roosting bats i.e. no suitable roosting features present.
<i>Low</i>	A structure which could be used opportunistically by individual bats i.e. one or more potential roost sites which do not provide sufficient space, shelter, protection, appropriate conditions (e.g. temperature, light, humidity) and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats.
<i>Moderate</i>	A structure which could be used by bats but is not likely to support a roost of high conservation status (e.g. maternity roost). This structure would support features which exhibit suitable size, shelter, protection, conditions and surrounding habitat for roosting bats.
<i>High</i>	A structure which is obviously suitable for supporting larger numbers of bats, on a regular basis and for longer periods of time.

## 5.5 Results

### 5.5.1 Building description relevant to bats

The application site supports three structures: the main house, the outbuilding and a wooden garden shed. The main house and outbuilding are described below.

#### The house

The house comprises a brick built two-storey structure which rises to an inset pitch and hip style roof clad with clay tiles which is surrounded by stonework parapet walls (Figure 4). Two brick chimney stacks extend through the opposite hip roof faces, with the join between the roof and brickwork sealed with lead flashing. A two-storey flat roof extension is located on the eastern elevation of the main structure, with a further mono-pitched extension with a clay-tiled roof located on the eastern elevation of this (Figure 5). A third chimney with a brickwork buttress extends up the eastern elevation of the flat-roofed extension. The northern and southern elevations of the property are clad with dense ornamental climber growth which partly obscures the number of wooden framed windows located on both elevations. The windows have been installed with no gap between them and the surrounding brickwork.

Internally, the main house supports a single roof void which is arranged around the converted loft. The void extends from the eaves up to the two chimney stacks (Figure 6), with two narrow and low sections along the north and southern elevations (Figure 7). The void is lined with heavy duty bitumen felt throughout and insulated with spun rockwool.



Figure 4 – south elevation of the main house



Figure 5 – north and east elevations of the main house



Figure 6 – roof void beneath the western hip end



Figure 7 – northern area of the roof void

An account of suitable access/egress features and recorded evidence of bat activity is given in table 4.

**Table 4 - Recorded features and activity**

<b>Suitability</b>	<b>Evidence</b>
<p><b>Exterior</b></p> <p>The following suitable access/egress and roosting features were recorded externally:</p> <ul style="list-style-type: none"> <li>- A number of lifted roof tiles on the inset hipped roof.</li> <li>- Lifted lead flashing surrounding the chimneys that extend from the hipped roof.</li> </ul>	<p>No evidence of bat activity was recorded externally during the survey.</p>
<p><b>Interior</b></p> <p>The following suitable access/egress and roosting features were recorded internally:</p> <ul style="list-style-type: none"> <li>- The roof void supports a suitable environment for roosting bats.</li> </ul>	<p>The following evidence of bat activity was recorded internally during the survey:</p> <ul style="list-style-type: none"> <li>- A small number of pipistrelle bat type droppings were recorded adhered to the rendered chimney breasts at both ends of the roof void.</li> <li>- Accumulations of long-eared <sup>1</sup>bat type droppings were recorded below each of the hip joints within the roof void. The droppings numbered 15 to 20 in each location which is indicative of a single bat roosting on an occasional basis. The condition of the droppings indicated recent roosting activity.</li> </ul>

### The outbuilding

The outbuilding comprises a single storey structure which rises to a pitched and gable design roof clad with concrete interlocking roof tiles (Figure 8). The structure is constructed from brickwork and concrete panels. Plastic guttering is attached to wooden fascia boards at the eaves on the northern and southern elevations.

Internally, the structure is open to the ridge and does not support a roof void.

---

<sup>1 1</sup> There are two species of long-eared bat resident in the UK. The brown long-eared bat *Plecotus auritus* is generally common and widespread throughout and is usually recorded roosting within buildings of varied types. The grey long-eared bat *P. austriacus* is a very rare species, with most modern records confined to coastal southern England, the Isle of Wight and southern Wales. The two species are similar in appearance but can be identified with close observation. Droppings of both species are essentially identical and therefore the only wholly reliable method of species identification is through DNA analysis of droppings. Given the rarity and restricted range of the grey long-eared bat it is reasonable to assume that the overwhelming majority of long-eared bat observations are brown long-eared until confirmed otherwise.



Figure 8 – northern elevation of the outbuilding

An account of suitable access/egress features and recorded evidence of bat activity is given in table 5.

Table 5 - Recorded features and activity

	<b>Suitability</b>	<b>Evidence</b>
<b>Exterior</b>	No suitable access/egress and roosting features were recorded externally.	No evidence of bat activity was recorded externally during the survey.
<b>Interior</b>	No suitable access/egress and roosting features were recorded internally.	No evidence of bat activity was recorded internally during the survey. However, evidence of rodent activity was recorded.

5.5.2 *Site grounds description relevant to bats*

The site grounds comprise hard-standing, managed lawn, ornamental shrubs and scattered trees. Further afield the local landscape comprises blocks of broad-leaved and plantation woodland, permanent pasture, arable farmland, mature hedgerows and scattered trees. In this context, the habitats within the footprint of the proposal are considered unexceptional for foraging and commuting bats, however, given their location within a landscape which is suitable for commuting and foraging bats, it is highly likely that bats will commute and forage through the site.

5.6 **Assessment**

When considered in view of the criteria set out in Table 4, the existing dwelling is considered to support moderate roost suitability - i.e. a structure which could be used by bats but is not likely to support a roost of high conservation status (e.g. maternity roost). This assessment is based on the level of evidence and the number and nature of features recorded during the survey. The outbuilding is considered to support negligible suitability for roosting bats based on the absence of suitable access/egress and roosting features.

## 6 Bat Emergence / Re-entry Survey

### 6.1 Methodology

The emergence and re-entry surveys were undertaken in accordance Bat Conservation Trust's (BCT) Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edition). Three surveyors were positioned in order to provide sufficient coverage of property when stationary. In addition, infra-red illuminators and a nightvision video camera were used to improve visibility. All emergences, re-entries and general activity were recorded during the course of each survey. Recordings were later analysed using Sonobat bat call analysis software to confirm species identification.

### 6.2 Surveyor/s

The surveys were carried out by suitably experienced bat surveyors including Samantha Munslow, Duncan Gilmartin, Peter Clark, Jackie Kirby and Katherine Horner.

### 6.3 Survey area

The survey area comprised all elevations of the existing property. This enabled survey coverage of all suitable access/egress and roosting features which were recorded during the preliminary bat roost assessment.

### 6.4 Survey date

The date and timings of the emergence and re-entry surveys are presented in Table 5. The emergence surveys commenced 15 minutes prior to sunset and continued for at least 1.5 hours and the re-entry survey commenced at least 1.5 hours before dawn and continued for 15 minutes after dawn.

**Table 5** survey dates and timings

<b>Survey type</b>	<b>Date</b>	<b>Start</b>	<b>Finish</b>	<b>Sunset/sunrise</b>
<i>Emergence</i>	01/06/2021	20:54	22:42	21:10
<i>Re-entry</i>	15/06/2021	03:10	05:05	04:49

### 6.5 Survey equipment

Survey equipment comprised:

- Pettersson D240X bat detector
- Elekon Batlogger M detector
- Sony FDR-AX53 Video camera
- Infra-red illuminators

### 6.6 Weather conditions

Weather conditions during the surveys are provided in Table 6:

**Table 6** emergence and re-entry weather conditions

Survey	Date	Precipitation		Temperature		Wind		Cloud Cover	
		Start	Finish	Start	Finish	Start	Finish	Start	Finish
Emergence	01/06/2021	Nil	Nil	19.0°C	17.0°C	Bf 0	Bf 0	20%	30%
Re-entry	15/06/2021	Nil	Nil	16.0°C	17°C	Bf 1	Bf 1	90%	70%

## 6.7 Results

### 6.7.1 Visit 1 – 1<sup>st</sup> June 2021 – Dusk Emergence Survey

No bats were recorded emerging from the property during the emergence survey carried out on the 1<sup>st</sup> June 2021. The first bat recorded comprised a common pipistrelle *Pipistrellus pipistrellus* bat which commuted west to east past the northern elevation of the house at 21:21. This was followed by a second common pipistrelle at 22:06. No further activity was recorded until 22:19 when a long-eared bat was recorded to the west and north of the house. A whiskered/Brandt's *Myotis mystacinus/ brandtii* bat was recorded briefly to the west of the house at 22:18. The last bat recorded comprised a common pipistrelle which commuted north to south past the western elevation at 22:27.

### 6.7.2 Visit 2 – 15<sup>th</sup> June 2021 – Dawn Re-entry Survey

No bats were recorded re-entering the property during the dawn re-entry survey. Despite suitable conditions, only two common pipistrelle registrations were recorded during the course of the survey. These comprised a brief pass at 03:56 and a single bat commuting in a northerly direction past the eastern elevation of the property at 03:58.



## 7 Badgers

### 7.1 Methodology

The survey involved a detailed investigation of the site to identify evidence of badger residence, foraging or territorial activity. This includes badger setts, latrine sites, dung piles, well-used trails, prints and hairs. Particular emphasis was placed on locating badger setts, paths and signs of territorial activity such as dung piles and latrines.

### 7.2 Limitations

Limitations were not encountered during the course of the survey.

### 7.3 Results

No evidence of badger activity was recorded during the survey. However, the site does support suitable foraging habitat for badgers. No evidence of a badger sett was recorded within the application site, however, suitable habitat for the formation of a sett is present within the local area.

### 7.4 Assessment

Badger setts are considered to be absent from the site, however, there is considered to be moderate potential for badgers to utilise foraging opportunities within and surrounding the site.

## 8 Dormice

### 8.1 Methodology

An assessment was made of the suitability of habitat on site to support hazel dormice. Key habitats are woodland, scrub and hedgerows, particularly where these offer dense vegetation within which to nest/hibernate and key resources such as hazel nuts, fruiting/nectar-rich plants (e.g. hawthorn, bramble) to provide a continuum of food resources throughout the active season and honeysuckle *Lonicera periclymenum* (for nesting material). Landscape-scale habitat linkages such as hedgerows are fundamental for dormouse presence where small scale or sub-optimal habitats are recorded within a site.

### 8.2 Limitations

Limitations were not encountered during the course of the survey.

### 8.3 Results

The site supports mature shrub planting. Whilst this highly sub-optimal habitat can be utilised by expanding dormice populations if well connected to optimal habitat such as broadleaved woodland, the isolated patches of ornamental planting and dividing hedgerow within the site do not support this connectivity and as such, are considered to be unsuitable for this species.

#### 8.4 **Assessment**

Overall, the site is considered to support negligible potential for dormice.

## 9 Hedgehogs

#### 9.1 **Methodology**

The site was assessed for its suitability to support hedgehogs based on the presence of favoured habitats such as woodland edges, hedgerows, grassland and suburban habitats.

Hedgehogs are most abundant within gardens, parks and amenity land close to or within human settlements. They are generally scarce in areas of coniferous woodland, marshes and moorland, probably because of a lack of suitable sites and materials for the construction of winter nests (Morris, 2006). Any evidence of hedgehog activity such as prints or droppings was recorded.

#### 9.2 **Limitations**

Low detections rates are associated with evidence of hedgehog activity; therefore, absence of evidence does not confirm the absence of hedgehogs. For this reason, the assessment of the likely presence/absence of hedgehogs has largely been informed by the species' local distribution and the habitats within the site and local area.

#### 9.3 **Results**

The mature garden habitat within the site has the potential to support foraging hedgehog although no direct evidence was noted.

#### 9.4 **Assessment**

There is considered to be high potential for hedgehog to occur on site.

## 10 Reptiles

#### 10.1 **Methodology**

An assessment was made of the site's suitability to support reptile populations. Key habitat features include: tussocky/patchy grassland; scrub edge; linear watercourses; ponds; compost heaps; brash piles and rubble/soil heaps. Linkage to suitable habitat within the surrounding landscape will increase the potential for reptiles to occur, although populations can occur within isolated/fragmented habitats even within urban areas.

#### 10.2 **Limitations**

Limitations were not encountered during the course of the survey.

#### 10.3 **Results**

Mature garden sites such as this can support more widespread reptile species, such as slow-worm. However, the well managed condition of the lawn and flower beds, does

reduce the overall suitability of the site. Nevertheless, it is likely that transient reptiles may disperse through the site or use the site opportunistically given the sites connectivity to suitable habitat within the wider area. Without management, the site could establish habitat features which have greater suitability for reptiles.

#### 10.4 **Assessment**

There is considered to be low potential for small numbers of reptiles to occur on site.

## 11 Great Crested Newts

### 11.1 **Methodology**

Great crested newts are only present in their breeding ponds during the spring and early summer – for the rest of the year, they will be dispersed across the surrounding area, generally in grassland, scrub, woodland and hedgerows, although they may be found in gardens and brownfield sites. They can travel some distance from their breeding ponds, and as a general rule, developments within 500m of such a pond may have the potential to have an impact on GCN, although to a certain extent, this does depend on any intervening habitat or barriers to dispersal.

An assessment was made of any waterbodies and terrestrial habitat within the site for their suitability to support populations of amphibians. Suitable waterbodies will generally be characterised by the presence of good quality water, diverse macrophyte cover and an absence of fish. For the European-protected great crested newt, each waterbody is normally assessed using the Habitat Suitability Index (HSI) system (Oldham et al., 2000) and assigned a grading score between zero (poor suitability) and 1 (excellent suitability).

### 11.2 **Limitations**

The HSI for great crested newts is a measure of habitat suitability. In general, ponds with high HSI scores are more likely to support great crested newts than those with low scores. However, in isolation, the system is not sufficiently precise to allow the conclusion that any particular pond with a high score will support newts, or that any pond with a low score will not do so (Oldham et al., 2000).

### 11.3 **Results**

A number of waterbodies are present within Bentworth Village. The closest pond to the application site comprises a garden pond 150m to the south-west. The MAGIC data search reveals that a single pond within the village was subject to a great crested newt pond survey between 2017 and 2019 that confirmed the absence of this species. However, no further data relating to surveys of the remaining ponds was available and as such the species could occur within suitable nearby waterbodies.

The proposal will result in the loss of existing buildings, hardstanding, managed lawn and a small area of managed ornamental planting with limited cover opportunities. As such, the terrestrial habitat within the footprint of the proposal is considered to support opportunities for commuting/foraging great crested newts, but not breeding, hibernation or day resting.

#### 11.4 **Assessment**

Overall, there is considered to be moderate potential for great crested newt to occur on site. The occurrence of great crested newts is considered to be limited to commuting and foraging activity as the proposal will not result in the loss of habitat that is suitable for supporting breeding or resting places.

## 12 Breeding birds

#### 12.1 **Methodology**

An assessment was made of the site's suitability to support breeding bird species. Nesting birds will utilise a broad range of habitats, including: built structures, trees, scrub, isolated shrubs, dense herbaceous vegetation (terrestrial and aquatic) and open grassland. All bird species and evidence of breeding activity (active or inactive) observed on site were recorded.

#### 12.2 **Limitations**

The survey was undertaken outside of the breeding bird season for many species of bird, therefore, the assessment relied upon the presence of suitable habitat and inactive nests.

#### 12.3 **Results**

The following bird species were recorded within the application site during the course of the survey: chaffinch *Fringilla coelebs*, robin *Erithacus rubecula*, goldfinch *Carduelis carduelis*, blue tit *Cyanistes caeruleus* and great tit *Parus major*. The ornamental shrubs within the site's mature garden and vegetation that clads the main house are considered to support nesting opportunities for many of the species recorded during the survey.

#### 12.4 **Assessment**

The majority of the habitats within the site are considered to support nesting opportunities for various bird species. Overall, the site is considered to support high potential for breeding birds.

## 13 Discussion and Assessment of Impacts

### 13.1 Relevant legislation and policy

Circular 06/2005 identifies that applicants should not be required to provide information on protected species unless there is a reasonable likelihood that they will be present and affected by the proposed development. The site is considered to support habitats with suitability and potential for protected species and these may be affected by the proposed development. Therefore, the proposal triggers 'reasonable likelihood' under the Circular.

The Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (commonly referred to as the Habitats Regulations) may apply should protected species be confirmed on site.

In the case that a protected species (bats in this case) is found to be present and impacted by the proposal, the local planning authority will be required to engage with the Habitat Regulations. Permission will be granted unless:

- a) the development is likely to result in a breach of the Habitat regulations, and
- b) is unlikely to be granted a licence from Natural England to allow the development to proceed under a derogation from the law (under licence).

When considering whether Natural England would not be unlikely to grant a licence for the identified impact, the local planning authority must consider the three tests which are set out in the Habitat Regulations:

1. the consented operation must be for 'preserving 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'; (Regulation 53(2)(e))
2. there must be 'no satisfactory alternative' (Regulation 53(9)(a)); and
3. the action authorised 'will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range' (Regulation 53(9)(b)).

Natural England will grant a licence if the development proposal is able to meet the three tests.

Case-law (*Morge vs. Hampshire County Council*) has clarified that planning authorities are able to grant permission for developments that would cause a breach of the Regulations is likely (i.e. in the case of this proposal, destruction of a bat roost), provided that sufficient information is provided to give the planning authority assurance that the relevant EPSM licence is not unlikely to be granted - i.e. planning authorities also have a duty to assess planning applications against these tests.

### 13.2 **Designated sites**

The proposed development will not result in the direct loss of any of the identified designated sites. Nor will it result in the direct loss of any habitat that could be considered functionally linked supporting habitat for the species for which the sites were designated.

### 13.3 **Habitats**

The main habitats which will be directly impacted are species-poor semi-improved grassland and ornamental shrubs. As the vegetation to be removed is managed, easily replicable and of low botanical value, it is considered that there will be no impact to habitats of ecological importance such as priority habitats as a result of its loss.

### 13.4 **Bats**

The preliminary, emergence and re-entry surveys have confirmed that the property supports occasional pipistrelle and brown long-eared bat day roosts.

The bat mitigation guidelines identify that day roost used by more widespread species such as those recorded on site are of low conservation status.

The proposal will result in the loss of the identified roosts and works to demolish the building would potentially cause the killing, injury or disturbance to any bats present within roost features when works are undertaken.

The assessment of the roost characteristics, the nature of the development and the conservation status of the roosts which will be impacted by the proposed development has informed a strategy which will avoid, mitigate and compensate for the identified impacts.

### 13.5 **Badgers**

The site supports moderate suitability for badger. Therefore, impacts to badgers could occur during construction if trenches are left open. Impacts on badgers associated with loss or damage of setts or loss of foraging habitat are not anticipated.

### 13.6 **Hazel dormouse**

The proposal will not result in the loss of habitat which is considered to support suitability for dormice. Therefore, no impacts on dormice are anticipated.

### 13.7 **Hedgehog**

Impacts on hedgehogs are likely to be associated with the removal of foraging or nesting habitat associated with a mature garden.

### 13.8 **Reptiles**

The proposal will result in the loss of a small area of habitat which is considered to support low suitability for common species of reptile. Therefore, there is considered to be potential for impacts upon these species associated with the proposal.

### 13.9 **Great crested newts**

The proposed development will take place on habitat which supports negligible suitability for great crested newt resting places. As such, the proposal will not result in the loss of any great crested newt resting places. The only way in which impacts to great crested newts are anticipated is if great crested newts disperse into the construction footprint where they are at risk of being killed or injured.

### 13.10 **Breeding birds**

The proposal will result in the loss of suitable breeding bird habitat. The removal of this habitat has the potential to damage or destroy active bird nests if carried out during the breeding bird season which is generally seen as extending from March to the end of August, although may extend longer depending on local conditions. The proposal will also result in a net loss of bird nesting opportunities.

## 14 Requirement for further surveys

Further surveys are required where there is a reasonable likelihood that a protected species will be present and impacted by the proposed development. An assessment into the requirement for further surveys is presented below, however in summary, no further surveys are considered necessary for bats.

### 14.1 **Bats**

In order to provide robust confirmation on the presence and status of bat roosts and the extent that they may be affected by the proposed development as required by Circular 06/2005, further survey work in accordance with Natural England's standing advice and the BCT Good Practice Guidelines was undertaken of the property.

In accordance with these guidelines, further survey effort took the form of dusk emergence and dawn re-entry presence/absence surveys undertaken during the bat active season. No further surveys in respect of roosting bats are considered necessary.

Given the scale of the proposal further survey is considered unnecessary for understanding impacts on foraging and commuting bats subject to precautionary avoidance measures including a sensitive lighting scheme.

### 14.2 **Badgers**

Subject to the precautionary mitigation measures set out in Section 15, no further surveys are considered necessary.

### 14.3 **Hazel dormice**

As impacts on dormice are not anticipated, no further recommendations relating to dormice are considered necessary.

### 14.4 **Hedgehog**

Subject to the precautionary mitigation measures set out in Section 15, no further surveys are considered necessary.

### 14.5 **Reptiles**

Given the very small scale of the proposal and the small scale of available habitat there is not considered to be a high enough risk to reptiles for it to be reasonable to require that specific surveys are carried out. Precautionary measures have been specified below to ensure that any potential impacts are avoided.

### 14.6 **Amphibians**

As direct impacts to great crested newt are not anticipated, further survey work for great crested newts is not considered necessary. Impacts could occur where great crested newts enter the construction footprint, however, measures to avoid these impacts are set out in Section 15.



**14.7 Breeding birds**

Subject to the precautionary mitigation measures set out in Section 15, no further surveys are considered necessary.

## 15 Mitigation recommendations

### 15.1 Bats

#### 15.1.1 *Licensing*

As this work will result in the destruction of bat roosts, an EPSM licence will need to be obtained from Natural England before the proposed demolition works. A licence can be applied for once planning permission has been obtained. Natural England will grant the relevant licence to allow the developer to legally carry out the work that would otherwise be illegal – i.e. to destroy a bat roost and disturb / take bats. Provided the development accords with other national and local planning policy in terms of being an acceptable development that will provide a modern, energy efficient dwelling and helping the Local Authority meet local housing needs, the first two tests should be passed.

The Bat Mitigation Strategy set out below will ensure the development passes the third of the derogation tests, that of maintaining the favourable conservation status of bats.

#### 15.1.2 *Demolition mitigation strategy*

- The destructive search will be carried out during the active season period i.e. April to late-October. A toolbox talk will be given to contractors prior to the roof stripping works commencing. The toolbox talk will provide an introduction to the legal protection afforded to bats, the status of bats at the site including likely species and roosting locations, evidence to look out for and the protocol which will be followed if a roosting bat is identified. Appropriate signage will be provided and displayed on site to inform contractors of the required protocol when working where a bat roost has been recorded.
- The destructive search works will be led by a licensed bat worker, accompanied by construction contractors. There will be no disturbance of identified and potential roost features without the supervision of a bat worker. This is because during the proposed tile stripping period bats, if present, may be very difficult to locate and easily be overlooked.
- Immediately prior to the tile and shingle stripping works commencing, inspections of known bat roosting areas and potentially suitable areas will be carried out by a licensed bat worker, using an endoscope where required, to check for the presence of roosting bats.
- All suitable bat roosting features supported by the building will be removed by/under the supervision of the licensed bat worker using hand tools. The works will be carried out from a suitably erected scaffold.
- Any bats which are found during the destructive search works will be captured by the licenced bat worker with the use of thin gloves or a hand net. The bat will immediately be transferred to a holding bag before being placed within one of the previously erected bat boxes within the site grounds. Any injured bats will immediately be taken into care.

- Once the licensed bat worker is satisfied that all features that may provide bat roosting opportunities have been safely removed, the contractors can complete the demolition.
- If a bat is found during unsupervised works, all works will cease and the supervising bat worker will be contacted immediately.

#### 15.1.3 *Provision of new roosting sites*

Two Schwegler 2F bat boxes or similar will be installed on the mature trees located within the site ground. These will provide a temporary alternative roost site whilst the proposed development works are undertaken and will be retained as enhancement post development.

The new dwelling will support a small number of roost features which replicate existing characteristics and are proportionate to the roosts which will be lost. The proposed features will comprise:

- Modified ridge tiles - A roosting void beneath two ridge tiles will be created on the proposed property. Access to the void will be created by leaving a gap in the mortar line below the ridge tiles. A batten measuring at least 20mm high by 50mm long will be inserted into the wet mortar and removed in order to create a gap of sufficient size.
- Lighting - In order to limit any effects on foraging and commuting bats and ensure that the proposed mitigation is functional, external lighting to the new dwelling should be limited to only that which is absolutely necessary for safety purposes. The brightness of the lighting should be as low as possible and kept at a low level and directed away from any bat mitigation features. Lighting on sensors should not be so sensitive that foraging bats trigger them.

#### 15.2 **Hedgehogs**

In order to avoid harm to hedgehogs during the construction works the following precautionary measures will be employed:

- Any leaf litter or garden waste piles will be dismantled by hand in a sensitive and careful manner.
- No bonfires will be made or lit on site.

#### 15.3 **Badgers**

In order to avoid harm to badgers during the construction works, any trenches will either be covered at night or fitted with a soil or plank ramp to enable any badgers which fall in to leave on their own accord.

#### 15.4 **Reptiles**

There is limited potential for reptiles to be present and to be impacted by the development works given the nature of the habitats present and the scale of the proposed works. However, a precautionary approach to the site development is recommended, as follows:

- It is recommended that the current well-managed condition of the garden is maintained.

- All waste shall be placed directly into a skip so that rubble piles and therefore potential hibernation areas are not created;
- Piles of loose sand or other granular materials into which reptiles could bury are not to be left around the site. All such materials will ideally be delivered in bags and kept in such bags until required for use. Bags should be stored on pallets. If it is essential that they are delivered loose, they should only be dug into by hand;
- All trenches will be left covered at night. They must be checked in the morning before they are filled in.

#### 15.5 **Great Crested newts**

The proposal will not result in the loss of any terrestrial habitat for GCN, however, impacts could occur where GCN enter the construction footprint. Therefore, a precautionary approach to the site development is recommended, as follows:

- All waste shall be placed directly into a skip so that rubble piles and therefore potential hibernation areas are not created.
- Piles of loose sand or other granular materials into which GCN could bury are not to be left around the site. All such materials will ideally be delivered in bags and kept in such bags until required for use. Bags should be stored on pallets. If it is essential that they are delivered loose, they should only be dug into by hand.
- All trenches will be left covered at night. They must be checked in the morning before they are filled in.
- If GCN presence is unexpectedly found or suspected at any time during construction, works in that area will stop until further advice sought from a suitable experienced ecologist.

No further recommendations relating to great crested newts are considered necessary

#### 15.6 **Breeding birds**

Care should be taken that the development does not disturb breeding birds. The bird nesting season is taken to be March to August, inclusive. Any removal of suitable nest habitat will either need to be undertaken outside of this period or else checked by an experienced ecologist to ensure that no nesting birds are present. If occupied nests are present then the nest must not be removed, and works around the nest can only recommence once the nest becomes unoccupied of its own accord.

## 16 Enhancements

The delivery of biodiversity enhancement on development sites is promoted by the National Planning Policy Framework (NPPF) and Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006.

Where opportunities exist it is best practice to provide enhancement features which encourage greater biodiversity within development sites in accordance with the NPPF and Local Planning Authority's responsibilities under the NERC Act.

Opportunities for enhancement which are proportionate to the scale of the development include:

- The provision of new bird nesting opportunities in the form of three open fronted and three hole-entranced nest boxes. These could be installed in suitable locations within the wider site.
- Additional bat roost features which are additional to what is required to mitigate identified impacts will be installed to deliver ecological enhancement. This will likely take the form of wooden Kent bat boxes which will be installed on trees within the rear garden.

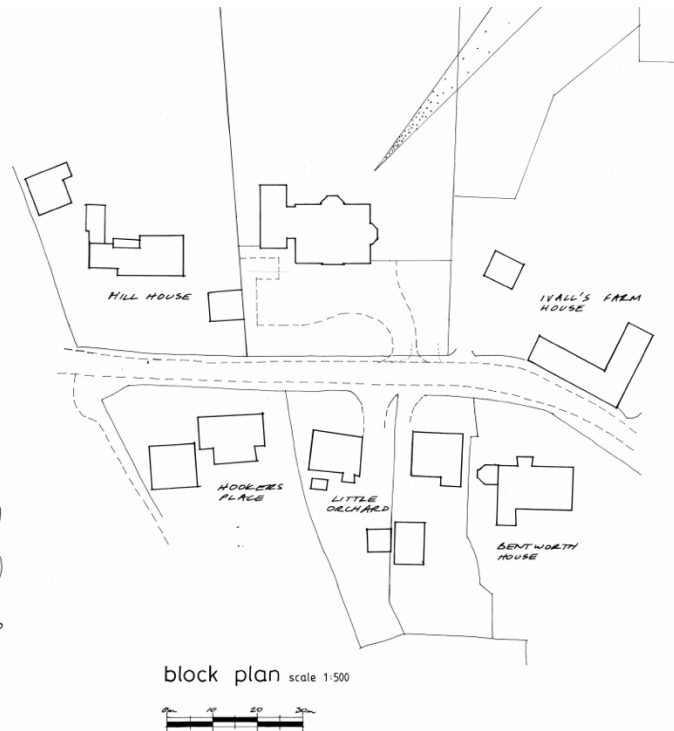
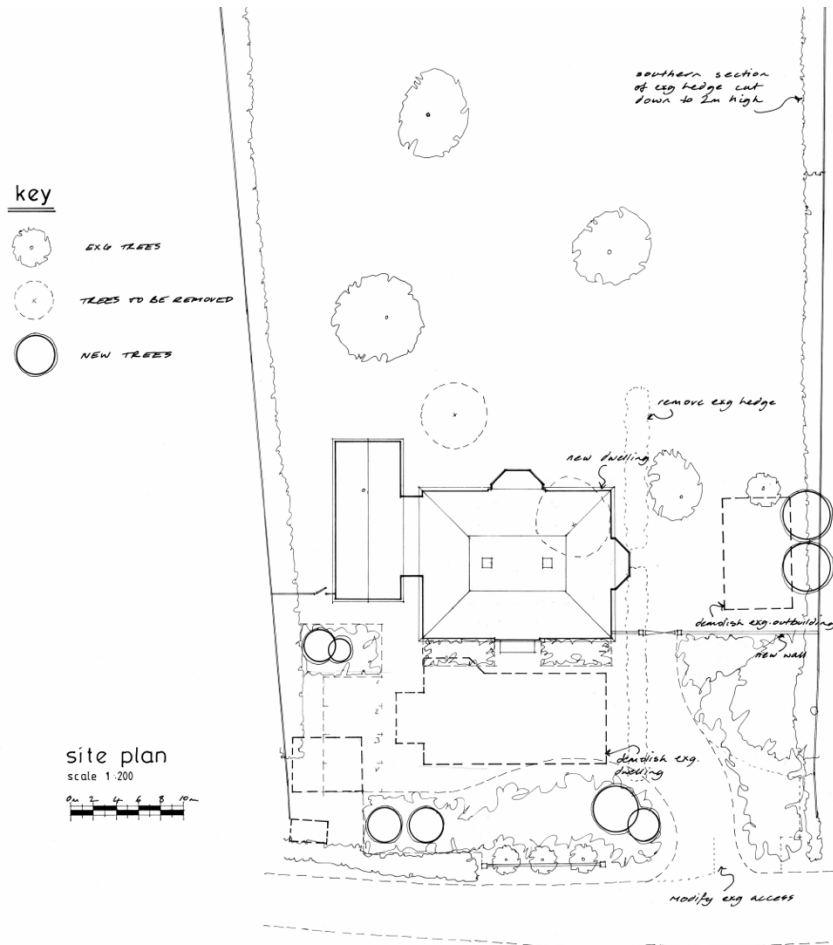
## 17 Conclusion

The extended phase 1 ecological assessment has confirmed that the site supports opportunities for a range of protected species including breeding birds, hedgehog and bats. However, given the scale of the proposal, it is possible to deliver a scheme which avoid impacts on the majority of identified protected and priority species. Further survey effort to confirm the presence/absence of bat roosts and assess the extent bats may be affected by the proposed works was undertaken in accordance with Natural England standing advice and BCT Good Practice Guidelines. This survey work has confirmed that the main house supports occasional pipistrelle and brown long-eared day roosts. The proposed demolition will result in the loss of the identified bat roosts. A mitigation strategy has been designed that would provide alternative roosting opportunities within the development. The mitigation strategy also sets out recommended timings and methods and recommends that a European protected species licence is obtained before any works to the property starts.

## 18 References

- **Altringham J D, 2003**, British Bats, Collins New Naturalist
- **Anon, 2001**, *Great Crested Newt Mitigation Guidelines*, English Nature, Peterborough.
- **Bat Conservation Trust, 2016**, BCT Bat Survey Guidelines Third edition
- **Chartered Institute of Ecology and Environmental Management (2017)** *Guidelines for Preliminary Ecological Appraisal*. CIEEM, Winchester
- **English Nature, 2002**, Barn owls on site – A guide for developers and planners
- **Gent T and Gibson S 1998** *Herpetofauna Workers Manual JNCC*
- **Joint Nature Conservation Committee. 1993.** *A Handbook for Phase 1 Habitat Survey: A Technique for Environmental Audit*. Peterborough: Joint Nature Conservation Committee.
- **Mitchell Jones AJ, 2004**, *Bat Mitigation guidelines*, English Nature
- **Mitchell Jones AJ and McLeish A P**, *The Bat Workers Manual*, JNCC
- **Morris, P. A. (2006)** *The New Hedgehog Book*. London, Whittet Books.
- **Natural Environment and Rural Communities Act 2006**, Ch 3, s. 40
- **Oldham R.S., Keeble J., Swan M.J.S. & Jeffcote M. (2000).** *Evaluating the suitability of habitat for the Great Crested Newt (Triturus cristatus)*. Herpetological Journal 10 (4), 143 - 155.

# Appendix 1 – Proposed Block Plan



revisions	int	date
Contractors, Sub Contractors and Suppliers are to check all relevant dimensions and levels of site and buildings before commencing any shop drawings or building work.		
This drawing is copyright and may not be reproduced in any part or form without the written consent of Fowler Architecture & Planning.		
project		
RUSSELL HOUSE BENT WORTH		
drawing		
site plan		
scale		
1:200	1:500@A1	FEB '21
drawing no. 201045-06		
rev		



39 High Street  
Pewsey  
Wiltshire  
SN9 5AF  
01672 569444  
enquiries@faap.co.uk



07760 208562

[info@phillipsecology.co.uk](mailto:info@phillipsecology.co.uk)

[www.phillipsecology.co.uk](http://www.phillipsecology.co.uk)

Hampshire office:  
Clifton Cottage  
Bucks Head Hill  
Meonstoke  
Hampshire  
SO323NA