



**Brighter strategies**  
for greener projects





**Client:** TFT Consultants  
**Project:** Compton Business Park  
**Report:** Scheme of Ecological Enhancements

## QUALITY ASSURANCE

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## 1.0 EXECUTIVE SUMMARY

Greengage Environmental Ltd (Greengage) was commissioned by TFT Consultants to produce a Scheme of Ecological Enhancements (SEE), detailing ecological enhancement features for the proposed development at Compton Business Park in Watchmoor Point, Camberley, Surrey, hereafter referred to as 'the site'.

The site has been granted Full planning permission (approval) for the demolition of the existing buildings and erection of a new warehouse for flexible use within Classes E(g)(ii), E(g)(iii), B2 and / or B8 (Application No. 22/1268/FFU).

Areas of soft landscape planting will be incorporated into the proposed development and include:

- Modified grassland for amenity use;
- Other neutral grassland with wildflowers;
- Introduced shrub;
- Mixed scrub using native species;
- Deciduous and conifer trees, including espaliers for screening; and,
- Species-rich native hedgerow.

This document has been produced to address Planning Condition 20 associated with the approval which states:

*'Prior to the occupation of the development hereby approved, a scheme of ecological enhancements shall be submitted to and approved by the Local Planning Authority. The scheme will include all the details set out in section 5.3 of the Biodiversity Report Greengage. The development shall be implemented in accordance with the approved details.'*

Enhancements are targeted at specific ecological receptors of note, known to be in the area, reflecting contemporary best practice and objectives of local conservation groups, Biodiversity Action Plans (BAPs) and planning policy.

The Preliminary Ecological Appraisal (PEA) i.e. baseline ecological assessment, determined the existing site to be of low ecological value, with vegetation cover provided by hedgerows as the main feature of biodiversity interest for both bats and birds. Four of the buildings were assessed as displaying low potential for use by roosting bats. Further nocturnal bat survey, comprising two emergence surveys, conducted in 2022 confirmed bats as likely absent from the buildings.

A range of opportunities to ecologically enhance the site have been identified during the detailed design process, to complement the landscaping and building use.

Ecological enhancements for the site include implementation of living roofs, wildlife friendly planting, integrated bird and bat boxes in buildings, hanging bird boxes in trees, and on-going wildlife sensitive management.

An increase in ecological value will be delivered in the medium to longer term as a result of the proposed ecological enhancements and site management. Monitoring of the recommended management of the site for biodiversity will occur frequently, as will ecological surveys for bats, birds and insects so that remedial actions can be performed accordingly.

## 2.0 INTRODUCTION

Greengage Environmental Ltd (Greengage) was commissioned by TFT Consultants to produce a Scheme of Ecological Enhancements (SEE), detailing ecological enhancement features for the proposed development at Compton Business Park in Watchmoor Point, Camberley, Surrey, hereafter referred to as 'the site'.

The SEE was requested in order to discharge Planning Condition 20, relating to ecology, associated with full planning permission (approval) that has been granted for 22/1268/FFU.

### 2.1 AIMS AND OBJECTIVES

This document aims to collate the site-wide ecological design concepts and future monitoring and management regime at the site.

Enhancements are targeted at specific ecological receptors of note, known to be in the area, reflecting contemporary best practice and objectives of local conservation groups, Biodiversity Action Plans (BAPs) and planning policy.

The suburban location of the site and limited baseline value as described in the Preliminary Ecological Appraisal (PEA)<sup>1</sup> and Biodiversity Impact Assessment (BIA)<sup>2</sup> produced by Greengage to support the planning application, means that there are opportunities to provide biodiversity enhancements that will provide net gains for local wildlife.

This document has been produced to address the following condition of the planning approval which specifically states:

*'20. Prior to the occupation of the development hereby approved, a scheme of ecological enhancements shall be submitted to and approved by the Local Planning Authority. The scheme will include all the details set out in section 5.3 of the Biodiversity Report Greengage. The development shall be implemented in accordance with the approved details.'*

*Reason: To preserve and enhance biodiversity in accordance with Policy CP14A of the Surrey Heath Core Strategy and Development Management Policies Document 2012.'*

The purpose of this SEE is to detail specifications for living roofs, wildlife friendly landscaping, bird nest boxes and bat boxes, which are to be incorporated into the scheme. The ecological enhancements specified will positively contribute to enhancing the ecological and wildlife value of the site, meet objectives of the planning condition and complement local and regional BAPs. Details on the construction method and living roof layouts and location are also included.

Works described in this report will be carried out at specific times throughout the installation process, supervised by a Suitably Qualified Ecologist (SQE) where appropriate. Otherwise, installation works will be undertaken unsupervised, by the 'Appointed Contractor' or their agreed 'Specialist Subcontractor', with reference to this strategy.

In accordance with the above aims, the purpose of this specification is to provide the 'Appointed Contractor' and/or 'Specialist Subcontractor' with clear instructions for the incorporation of habitats and enhancement features that will optimise the biodiversity value.

In addition, this specification includes a Management Plan for the successful establishment and long term management and monitoring of the habitats and enhancement features.

## 2.2 PROPOSED SCHEME

The SEE relates to the Full planning permission for the demolition of the existing buildings and erection of a new warehouse for flexible use within Classes E(g)(ii), E(g)(iii), B2 and / or B8.

The development consists of a new industrial unit, with associated internal office space, and external goods yard and parking areas.

Areas of soft landscape planting will be incorporated into the proposed scheme and include:

- Modified grassland for amenity use;
- Other neutral grassland with wildflowers;
- Introduced shrub;
- Mixed scrub using native species;
- Deciduous and conifer trees including espaliers for screening; and,
- Species-rich native hedgerow.

## 2.3 SITE LOCATION AND DESCRIPTION

The site extends to approximately 0.35 hectares (ha) and is centred on Ordnance Survey National Grid Reference (OS NGR): SU 86399 59797.

The site is located within Watchmoor Industrial Park, in a highly urbanised area of Camberley in Surrey. The site comprises hardstanding with five separate buildings used for commercial purposes and is surrounded by a boundary fence and hedgerow.

Residential housing and associated grey infrastructure are located to the east of the site, with commercial development including warehouse units to the north, south and west. Areas of greenspace within the close vicinity are limited, however hedgerows and lines of trees to the north may act as a green connectivity corridor to Blackwater River (660m west) and associated greenspace.



## 3.0 ECOLOGICAL BACKGROUND

### 3.1 BASELINE CONDITIONS

The site has been subject to a Preliminary Ecological Appraisal (PEA)<sup>3</sup>, Biodiversity Impact Assessment (BIA)<sup>4</sup> and bat presence/likely-absence survey<sup>5</sup>. The PEA and BIA were undertaken by Greengage and submitted in January 2023 and the bat presence/likely-absence report from Surrey Wildlife Trust Ecology Services was submitted in December 2023. This SEE should be read in conjunction with the PEA, BIA and bat presence/likely-absence reports.

The key findings of the reports are summarised below.

#### Habitats

The habitats on the site were assessed as having the biodiversity value of 0.08 area-based Biodiversity Units and 0.13 linear-based Biodiversity Units. The habitats that generated these values are described below.

##### Developed land; sealed surface

Developed land; sealed surface was the predominant habitat on site comprising five buildings (B1 - B5) and hardstanding surface. Areas of discarded building material were also present, in addition to scattered weeds and introduced shrub including *Buddleia Buddleja davidii*.

##### Modified Grassland

Scattered areas of modified grassland were recorded between the buildings and boundary hedgerow to the north of the site. Scattered scrub was also present within the grassland and included cotoneaster *Cotoneaster* spp.. At the time of the survey, the grassland was dry and discoloured due to heat and possible lack of maintenance. The sward had not been cut short.

##### Other Hedgerow

Small, ornamental hedgerows were present to the east of the site, planted in front of B2 and B3, and comprised bay *Laurus nobilis*.

The site was surrounded by a hedgerow dominated by cherry laurel *Prunus laurocerasus*, and Japanese spindle *Euonymus japonicus*. The hedgerow was at least 1.5m in height and young trees were also present. There was a lack of undergrowth vegetation, instead bare ground was present.

##### Artificial Unvegetated; Unsealed Surface

Artificial unvegetated; unsealed surface covered with leaf litter was recorded between the buildings and boundary hedgerow to the north. Additional areas of shingled ground were found in front of the most buildings (B2 and 3).

### Line of trees

To the rear of the site, in a westerly direction, a thin line of young trees comprising silver birch *Betula pendula*, sycamore *Acer pseudoplatanus*, blackthorn *Prunus spinosa* and yew *Taxus baccata* was recorded.

### Scattered trees

Four more young native scattered trees were present on the site, situated to the north and south against the boundary wooden fencing. Tree species present on site included apple *Malus* spp. and rowan *Sorbus* subg. *Sorbus*.

## Protected Species

### Bats

Four buildings (B1, B2, B3 and B4) on the site displayed low potential for roosting bats. B5 displayed negligible potential for roosting bats. No bats were identified emerging or returning to roost by Surrey Wildlife Trust Ecology Services in 2023, therefore bats have been determined as likely absent from the buildings.

There was very minimal habitat suitable for foraging or commuting bats, however the linear features including the hedgerows and line of trees offered some connectivity to green spaces in the local area. The activity during the bat survey was concentrated around the west and southern edges of the site along the hedgerows. Light spill from development and the destruction of linear habitats could result in a decrease in the sites value for foraging and commuting bats.

### Birds

The majority of the site lacked vegetation, but the boundary hedgerows and line of trees habitats provide prime nesting habitat. Compensatory planting was recommended for any habitats that were to be lost. Recommendations within the bat presence/likely-absence report included demolition of the buildings/impacts to roofs and removal of vegetation should take place between September - February, outside of the peak nesting bird season (March - August inclusive) and where it cannot be avoided nesting bird checks should be undertaken.

## Invasive Species

Cotoneaster was identified on site with characteristics of invasive cotoneaster species and several species of cotoneaster are listed on Schedule 9 of the Wildlife and Countryside Act (1981) (as amended)<sup>6</sup>. As such as a precaution it was recommended that the removal of this species should take place following guidance from DEFRA<sup>7</sup> to prevent its spread in the wild. It was also recommended cherry laurel and Japanese spindle, which are also Schedule 9 species, are removed sensitively from the site during the clearance works and destroyed in such a way that prevents their spread.

## 3.2 BIODIVERSITY ACTION PLANS (BAP)

In accordance with the aims and objectives of this document a review of the relevant BAPs and local conservation targets was undertaken. This review, along with the results of the PEA, BIA and further bat surveys, is then able to form the context for ecological enhancement at the site.

UK BAPs have been developed which set priorities for nationally important habitats and species. To support the BAPs, Habitat/Species Statements (otherwise known as Habitat/Species Action Plans (HAPs/SAPs)) were produced that provide an overview of the status of the species and set out the broad policies that can be developed to conserve them. A list of priority species of conservation importance was also developed.

The UK BAP was succeeded in 2012 by the UK-Post 2012 Biodiversity Framework which informed the creation of the Biodiversity 2020 strategy; England's contribution towards the UK's commitments under the United Nations Convention of Biological Diversity.

Despite this, the UK BAP priority species lists and conservation objectives still remain valid through integration with local BAPs (which remain valid), and in the form of the Habitats and Species of Principle Importance list (as required under section 41 of the Natural Environment and Rural Communities (NERC) Act).

Local Biodiversity Action Plans (LBAPs) ensure that national action plans (the UK BAP/Biodiversity 2020) are translated into effective action at the local level and establish targets and actions for locally characteristic species and habitats.

The site is subject to the Surrey BAP which defines key habitats and taxa/species of regional and local conservation interest. Receptors of relevance to this strategy include 'hedgerows' and 'biodiversity in developments'.

## 3.3 COMPETENCIES

Francesca Thorley has an undergraduate degree in Geography (BSc Hons) and a Master's degree in Biodiversity and Conservation (MSc), holds a Natural England Great Crested Newt Licence, is Certified to undertake River Condition Assessments and is an Associated Member of CIEEM. Francesca has over 5 years' experience in the commercial sector.

Helen Hinchliffe has an undergraduate degree in Physical Geography (BSc Hons), is a full member of CIEEM, holds a Natural England Great Crested Newt Licence and has over 16 years experience as a professional ecological consultant.

Faye Durkin, who has reviewed this report has a first class BSc (Hons) in Environmental Science and MSc in Environmental Management and Sustainable Development. She is a full member of CIEEM and an Associate member of IEMA. She co-chairs the IEMA Biodiversity and Natural Capital Steering Group and is a member of the IEMA Policy and Practice Committee. She has over 16 years of ecological consultancy experience and is licenced to survey bats and GCN in England and Wales. She has held mitigation licences for bats and GCN and holds a CL31 water vole displacement licence.

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This report was written by Francesca, reviewed by Helen and verified by Faye who confirms in writing (see the QA sheet at the front of this report) that the report is in line with the following:

- Represents sound industry practice;
- Reports and recommends correctly, truthfully and objectively;
- Is appropriate given the local site conditions and scope of works proposed; and
- Avoids invalid, biased and exaggerated statements.

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## 4.0 ECOLOGICAL ENHANCEMENTS

### 4.1 OVERVIEW

The proposed development provides the potential to enhance the biodiversity value of the site. This will primarily be achieved by the introduction of features within the hard and soft landscaping proposals and actions within the long-term management regime for the site, targeting specific ecological receptors.

The creation of specific habitats and attraction of protected and notable ecological receptors will complement the targets of national and local policy and BAPs.

Specifically, the proposals will seek to enhance the on-site habitat for the following species:

- Foraging and roosting bats (UK and local BAP priority species);
- Birds (including swift and house sparrow); and
- Invertebrates (including targeted Lepidoptera species through the inclusion of larval and nectar plants, and solitary bees and wasps through provision of burrowing habitat).

The following enhancements are to be included at the site:

- Wildlife-friendly landscape planting – to include tree, wildflower, hedgerow and herbaceous planting;
- Living roof areas - taking the form of substrate based biodiverse roof; with invertebrate enhancement features on the living roof such as sandy piles, rope coils and stone circles where appropriate;
- Invertebrate features to be included within the soft landscaping; and
- Bat and bird boxes;
- Wildlife sensitive management (provided in Section 5.0).

Detail on these features and specifications are provided in the chapter below.

### 4.2 WILDLIFE FRIENDLY LANDSCAPING

The soft landscaping for the development includes other neutral 'wildflower' grassland, native shrub planting, native hedgerows, introduced 'amenity' shrubs, modified 'amenity' grassland and trees to the boundaries of the site. This will make a contribution to biodiversity at the site through provision of nectar and pollen resources for pollinators, nesting habitat and a food resource for birds, foraging habitat for bats and sheltering and foraging opportunities for other wildlife that may be present in the area, amongst other taxa.

## Grassland

### Other Neutral 'Wildflower' Grassland

In order for the grassland to be considered an 'other neutral 'wildflower' grassland' the grassland must meet at least three of the following four criteria<sup>8</sup>:

- >20% cover of broadleaved herbs and sedges;
- >8 species per m<sup>2</sup> (including forbs, grasses sedges and rushes, and excluding bryophytes);
- ≥1 grass species that is not generally sown for intensive agricultural production (i.e. rye-grasses *Lolium* spp. and timothy *Phleum pratense*, cock's foot *Dactylis glomerata*, meadow fescue *Festuca pratensis*) is least abundant; or,
- Cover of rye-grasses and white clover, where present, is <30%.

As such a seed mix which contains species given in Table 4.1 would be suitable to be considered as an other neutral grassland.

Table 4.1 Other neutral 'wildflower' grassland suggested species

Common name	Scientific name
Grasses	
Common bent	<i>Agrostis capillaris</i>
False oat grass	<i>Arrhenatherum elatius</i>
Yorkshire fog	<i>Holcus lanatus</i>
Crested dog's tail	<i>Cynosurus cristatus</i>
Rough meadow grass	<i>Poa trivalis</i>
Creeping bent	<i>Agrostis stolonifera</i>
Herbs/forbs	
Yarrow	<i>Achillea millefolium</i>
Common Knapweed	<i>Centaurea nigra</i>
Field Scabious	<i>Knautia arvensis</i>
Oxeye Daisy	<i>Leucanthemum vulgare</i>
Birds foot Trefoil	<i>Lotus corniculatus</i>
Salad Burnet	<i>Sanguisorba minor</i>
Cowslip	<i>Primula veris</i>
Selfheal	<i>Prunella vulgaris</i>
Meadow buttercup	<i>Ranunculus acris</i>
Kidney vetch	<i>Anthyllis vulneraria</i>
Cornflower	<i>Centaurea cyanus</i>
Cuckooflower	<i>Cardamine pratensis</i>

Common name	Scientific name
Wild Marjoram	<i>Origanum vulgare</i>
Red Campion	<i>Silene dioica</i>
Tufted Vetch	<i>Vicia cracca</i>
Wild Carrot	<i>Daucus carota</i>
Rough Hawkbit	<i>Leontodon hispidus</i>
Ribwort Plantain	<i>Plantago lanceolata</i>
Common Sorrel	<i>Rumex acetosa</i>
Field poppy	<i>Papaver rhoeas</i>
Yellow Rattle	<i>Rhinanthus minor</i>

### Modified 'Amenity' Grassland

Modified grassland typically has <9 species per m<sup>2</sup> and is frequently characterised by an abundance of rye-grasses and white cover. The modified grassland could be sown or turfed. If sown a seed mixture such as Emorsgate strong lawn grass mixture EG22 could be used or fine lawn grass mixture EG21. If turfed a standard lawn turf can be used.

### Native Shrub and Native Hedgerows

Native species that can be used as shrub planting and hedgerow planting will include species from the following list (list not exhaustive):

- Dogwood *Cornus sanguinea*;
- Elder *Sambucus nigra*;
- Field maple *Acer campestre*;
- Hazel *Corylus avellana*;
- Broom *Cytisus scoparius*;
- Bird cherry *Prunus padus*;
- Sessile oak *Quercus petraea*;
- Red current *Ribes rubrum*;
- Goat willow *Salix caprea*; and,
- Guelder rose *Viburnum opulus*.

### Introduced 'Amenity' Shrub

Where possible, native plant species or species that are of value to pollinators (e.g. those listed on the Royal Horticultural Society Plants for Pollinators<sup>9</sup>) will be incorporated into the soft landscape planting design at site.

In particular, species which are ‘climate resilient’ requiring little maintenance with a high level of drought tolerance should be favoured. Species within those chosen could include:

- Euphorbia species such as *E. characias*;
- Yarrow *Achillea* species;
- *Stachys byzantina*;
- Lesser calamint *Clinopodium nepeta*;
- *Verbena bonariensis*;
- *Sedum spectabile*;
- *Perovskia* ‘Blue Spire’ or other Mediterranean herbs including Rosemary, *Thymus* spp, Lavenders or *Salvia* species;
- *Phlomis russeliana*; and
- *Armeria maritima*.

## Tree Planting

New tree planting will use native species, where possible, and trees bearing fruits and berries, such as:

- Hornbeam *Carpinus betulus*;
- Silver birch *Betula pendula*;
- Sweetgum *Liquidambar styraciflua*;
- Callery pear *Pyrus calleryana*;
- Rowan *Sorbus aucuparia*; and,
- Whitebeam *Sorbus aria*.

## Horticultural Best Practice

The landscaped areas will require maintenance once established. The use of pesticides (herbicides, insecticides, fungicides and slug pellets) should be discouraged to prevent changes to the food chain, particularly on invertebrates, birds and/or mammals.

### 4.3 BIODIVERSE ROOF

The biodiverse living roof will be a substrate based biodiverse system plug planted and seeded with suitable species. A total of 30m<sup>2</sup> of biodiverse roof will be installed at the proposed development on both buildings to the north east corner of the site.



## Substrate specification

At least three industry-standard substrate types will be used on the biodiverse roof in order to improve habitat heterogeneity and increase ecological niche provision. The different substrate types will be ‘patterned’ to create habitat structure for invertebrates and aesthetic interest. Organic content will be kept below 20% in all substrates. The three substrate types will include:

- One substrate will be a ‘typical’ biodiverse substrate designed for extensive living roofs, composed of recycled crushed brick, expanded clay shale and recycled organic content. Bauder’s Biodiverse substrate<sup>10</sup> is a suitable product.
- One substrate will be composed of pebbles/Caledonia cobbles of roughly 40-120mm size mixed with the biodiverse roof substrate;
- One substrate will be a finer gravel/sandy substrate.

Substrate depths should vary across rooftops between 80 and 150 mm, with at least 30% of the roof 150 mm deep, to ensure suitable retention of water and embed resilience for future climate risks, including longer and more frequent periods of drought.

## Species/Seed Mixes

Due to the unpredictable nature of colonisation and its dependence on plant propagules in the area, the low-nutrient substrate will be seeded and plug planted with a suite of native species of known value for the targeted ecological receptors. The diverse mix of species increases the flowering period, increasing the availability of nectar for pollinators throughout the year. Seed mixes and species composition will vary across the roof depending on substrate types.

Seeds will be sown at a rate of 5g/m<sup>2</sup> with plugs planted at a density of 15-20/m<sup>2</sup> with a minimum root ball of 25cm<sup>3</sup>.

Suitable seed mixes can be procured from a variety of retailers that are tailored for exposed, low-nutrient conditions on roof tops. Bauder’s Flora 3 Seed Mix<sup>11</sup> contains 49 species including 35 wildflowers on the RHS Perfect for Pollinators list. The diverse mix of species increases the flowering period, increasing the availability of nectar for pollinators throughout the year. This seed mix, or similar products from other suppliers, should be used on the biodiverse substrate areas.

Seed mixes will be supplemented with stonecrops *Sedum spp.* which are drought tolerant.

below gives suitable species for each of the substrate types.

These species are selected for their suitability to well-drained substrates (being ideally for ‘rockery’ type planting which would be recreated in the cobbled areas) as well as their biodiversity value.

Table 4.2 Guide to suitable species for biodiverse roof

Common name	Scientific name
Fine to medium aggregate areas	

Common name	Scientific name
Yarrow	<i>Achillea millefolium</i>
Agrimony	<i>Agrimonia eupatoria</i>
Kidney Vetch	<i>Anthyllis vulneraria</i>
Thrift	<i>Armeria maritima</i>
Common daisy	<i>Bellis perennis</i>
Common Knapweed	<i>Centaurea nigra</i>
Viper's Bugloss	<i>Echium vulgare</i>
Blue fleabane	<i>Erigeron acer</i>
Dropwort	<i>Filipendula vulgaris</i>
Lady's Bedstraw	<i>Galium verum</i>
Common Rock-rose	<i>Helianthemum nummularium</i>
Perforate St John's Wort	<i>Hypericum perforatum</i>
Common cat's-ear	<i>Hypochaeris radicata</i>
Wild Candytuft	<i>Iberis amara</i>
Field Scabious	<i>Knautia arvensis</i>
Rough Hawkbit	<i>Leontodon hispidus</i>
Oxeye Daisy	<i>Leucanthemum vulgare</i>
Birdsfoot Trefoil	<i>Lotus corniculatus</i>
Mellilots	<i>Melilotus spp</i>
Wild Marjoram	<i>Origanum vulgare</i>
Hoary Plantain	<i>Plantago media</i>
Salad Burnet	<i>Sanguisorba minor</i>
Cowslip	<i>Primula veris</i>
Selfheal	<i>Prunella vulgaris</i>
White stonecrop	<i>Sedum album</i>
Bladder Campion	<i>Silene vulgaris</i>
Red clover	<i>Trifolium pratense</i>
Dark Mullein	<i>Verbascum nigrum</i>
Wild pansy	<i>Viola tricolor</i>
Free draining cobble dominated substrate	
Sea thrift	<i>Armeria maritima</i>
South American vervain	<i>Verbena bonariensis</i>
Great mullein	<i>Verbascum thapsus</i>
Yarrow	<i>Achillea spp.</i>

Common name	Scientific name
Lesser calamint	<i>Calamintha nepeta</i>
Common primrose	<i>Primula vulgaris</i>
Mother-of-Thyme	<i>Thymus polytrichus</i>
Small scabious	<i>Scabiosa columbaria</i>
Bugle	<i>Ajuga reptans</i>
Biting stonecrop	<i>Sedum acre</i>
Mexican fleabane	<i>Erigeron karvinskianus</i>
Maiden pink	<i>Dianthus deltoides</i>
Rock rose	<i>Cistus x purpureus</i>
Sticky catchfly	<i>Silene viscaria</i>
Common wallflower	<i>Erysimum cheiri</i>

## Invertebrate Habitat Features

A range of invertebrate habitat structures have been recommended for incorporation onto the living roofs proposed within the soft landscape design to provide habitats suitable for invertebrates and further increase the range of micro niches and biodiversity. Sandy piles, rope coils and stone swirls will be integrated into the biodiverse roof to enhance its value for invertebrates and provide aesthetic interest.

It is recommended that a minimum of one of each enhancement feature described below is provided on the biodiverse roof shown in Appendix A, where examples of the features are also shown.

### Sandy piles and stones

Many species of burrowing solitary bees and wasps require sandy areas to burrow and nest. Provision of sandy piles provides nesting opportunities for such invertebrates within close proximity of a foraging resource. One sandy pile will be incorporated on each area of biodiverse roof. It will be compacted to form a sandcastle effect, and be 50cm high covering one square metre, with 30° angled sides. Rocks and stones may be placed on the surface to increase stability, see Figure 4.1.

Figure 4.1 Sandy piles on biodiverse roof



### Rope coil and stone swirls

A rope made from natural fibres will be used such as Manila rope which is suitable for general outdoor use. Manila rope is made from the leaves of the plant *Musa textilis* and will last up to 10 years, reducing maintenance requirements. The rope will be coiled in a spiral shape to cover an area of 1m<sup>2</sup>; the rope will be coiled loosely to ensure suitable gaps are created for invertebrates. Pegs will need to be used to harness the rope to the roof and ensure that it cannot blow away. One rope coil will be installed on each area of biodiverse roof, and stone swirls can also be incorporated, see Figure 4.2.

Figure 4.2 Rope coil on biodiverse roof



## Installation

Issues with living roofs most commonly occur as a consequence of poor installation. With this in mind only experienced, suitably qualified and dedicated living roof providers should be used for the living roof install. The provider will be given all plans relating to the design of specific roofs as well as this SSE document.

As per guidance in the Green Roof Organisation code, the following four steps should be followed prior to the planting of roofs:

1. Prior to installation of the planting, the substrate, drainage layer and any moisture mat should be saturated;
2. Pre-water the plants before removing them from their trays;
3. Insert plants and gently water them in; and
4. Ensure that the substrate is irrigated for an initial period of 4-6 weeks to allow the plants to sufficiently establish themselves.

## Maintenance and Monitoring

Biodiverse roofs should require little maintenance following initial install and irrigation during establishment.

A single inspection should be undertaken annually. Drainage outlets should be inspected and cleared where necessary, nuisance species such as Buddleja or Canadian fleabane *Erigeron canadensis* should be removed.

#### 4.4 INVERTEBRATE FEATURES

The inclusion of the living roof habitat and areas of soft landscape planting will stand to provide good foraging and sheltering habitat for invertebrates and may act to encourage them to the site. There are opportunities to provide invertebrate features such as pollinator posts and a loggery on the site at ground level.

Four pollinator posts should be integrated within the ground level soft landscape planting, in sunny, exposed areas within the other neutral grassland where wildflowers are present to provide nectar sources within close proximity. The products shown in Appendix A are suitable examples, however Greengage does not officially endorse any products. The locations of where these have been incorporated into the landscape plans has been provided in Appendix A.

One loggery should also be integrated within the soft landscape planting in a sunny, exposed area within the other neutral grassland where wildflowers are present to provide nectar sources within close proximity. The loggery should be made up of varying sizes of wood from small twigs to large sections of trunk as showing in Appendix A. An indicative location has been provided in Appendix A.

#### 4.5 BAT AND BIRD BOXES

The inclusion of the living roof habitat and areas of soft landscape planting will stand to provide good foraging habitat for bats and birds and may act to encourage them to the site. It is then appropriate to provide opportunities for roosting bats and provide nest boxes for a number of Surrey BAP priority bird species near/facing on to the new foraging resource that will be present within the site.

Open fronted nest boxes for generalist bird boxes, sparrow terraces and swift boxes will be incorporated within the scheme. The products shown in Appendix A are suitable examples, however Greengage does not officially endorse any products.

Three bat boxes should be fixed to the building and should be positioned to be south facing. These should be installed at least 3 m high away from lighting fixtures. The products shown in Appendix A are suitable examples, however Greengage does not officially endorse any products. However longer lasting materials such as 'woodcrete' or similar is recommended due to the increased longevity and better thermal stability. Indicative locations have been provided in Appendix A.

One box each of the sparrow terrace and general purpose box and two of the swift boxes should be provided for this development. These should be fixed on to the building using the suppliers' instructions. They should avoid full south facing aspects of the building, have good connectivity to suitable habitat and be placed at least 2 m high. The two swift boxes should be placed side by side. Indicative locations have been provided in Appendix A.

All bat and bird boxes should be placed out of direct sunlight and the prevailing strong winds, with unobstructed access and not directly above or under windows, doors or balconies. A SQE should advise on the exact locations (siting) for these on-site on the day of installation.

## 5.0 MANAGEMENT AND MONITORING

This section provides an overview of the relevant management and monitoring features of the ecological enhancements at the site.

The management plan will follow a clearly defined 5-year timetable that will be used as a reference point for site maintenance, monitoring and any future planting and enhancement works that may be necessary.

Living roofs are dynamic, and the species composition is anticipated to change over time, due to plant selection resulting from the prevailing climatic conditions, natural colonisation, and succession. As a result, some of the actions within the first 5 years will be dependent upon rate of growth or success of initial planting/sowing and enhancements. In general, where measures have not been stated it is due to a non-intervention policy once the features have been established.

This management plan will also be iterative in the medium to long-term, adapting in a staged process to the changing roof composition and in response to the feedback from monitoring exercises. Suggestions can be made to alter the enhancement measures or supplement the planting regime as necessary. Primarily, the management plan will include actions to maintain the ecological features and habitats specified within the SEE, which are:

- Optimise biodiversity measured by the range of wildlife benefiting plant species and invertebrate, bird and bat species using the landscaped areas, enhancement features and living roofs;
- Encourage invertebrates through diverse range of floral species and suitable invertebrate niche habitats; and,
- Ensure habitats maintained continue to provide the BNG specified within the Greengage BIA.

The management actions are summarised in Table 5.1. The table outlines the necessary responsibilities and key objectives for the next 5 years with monitoring surveys conducted in the summer (as specified in Section 5.1), informing any management actions necessary to be undertaken in the autumn.



Table 5.1 Summary of Habitat Management Actions for First 5 Years

Year after completion and season	Habitat Management Plan
Year 1 -5 (Spring)	Grass cutting of the modified 'amenity' grassland should be undertaken as necessary to allow for grass to be kept at 38mm in height in accordance with the Landscape Specification <sup>12</sup> .
	Wildflower grassland should be cut twice a year, once in February - March. Arisings should be raked and removed from site.
	If required, grasslands should be reseeded.
	Removal of invasive species/unwanted weeds prior to setting seed.
Year 1 -5 (Summer)	Grass cutting of the modified 'amenity' grassland should be undertaken as necessary to allow for grass to be kept at 38mm in height.
	In late summer, if required, grasslands should be reseeded.
	Re-seeding/plug-planting of green roof, if required.
Years 1 - 5 (Autumn/Winter)	Where specimens have died, shrubs should be replanted.
	Cutting back of shrub, hedgerow and tree vegetation can be undertaken between September - February.
	Litter removal should be undertaken throughout all habitats, this should include human based litter and leaf litter.
	Removal of invasive species/unwanted weeds if not removed during spring.
	Bat and bird boxes should be cleaned out and any obstructions to the boxes and pollinator podiums should be cleared.

## 5.1 MONITORING

It is recommended for a SQE to undertake the monitoring programme, observing any natural colonisation on the living roof and planting areas, the success of the seed mix and plug planting and use of the roofs by bats, birds and invertebrates as key biodiversity indicators. The monitoring for bats, birds and invertebrates in particular will occur annually for the first 5 years and further monitoring visit frequency should be determined by the SQE after 5 years dependant on monitoring and management outcomes up to 30 years from practical completion of the project. Monitoring will focus on the diversity and abundance of these species.

At or just after Practical Completion of the site, a SQE should inspect the ecological enhancements implemented as a result of the recommendations in this strategy. Five further site surveys over the following 5 years after practical completion to monitor the effectiveness for increasing biodiversity are proposed (i.e. one visit annually). Monitoring will occur in the summer months (June/July/August) when biodiversity should be at its peak. Monitoring will include a full botanical inventory and condition assessment of habitats that require it for the purposes of monitoring BNG.

Indicators of success will include the successful establishment of a wide variety of plant species, natural colonisation of floral species in the bare areas on the roofs, evidence of invertebrates inhabiting the ecological features, evidence of bird activity such as birds using the nest boxes and bat activity such as using the bat boxes or foraging over the living roofs.

After a monitoring visit has been undertaken a report should be created and the SEE and Habitat Management Plan reviewed/updated prior to commencing the next years management.

**The SQE must be a licenced (or accredited) bat ecologist in order to undertake any bat box checks.**

## 5.2 RESPONSIBILITY

### Maintenance

Maintenance of all enhancement features, other than the living roofs, should be the responsibility of the owner/developer or a company appointed by the owner/developer.

Living roof maintenance should be undertaken by the roof supplier. This should take place annually for the lifetime of the green roof.

The building owner/developer should keep a record of all maintenance carried out internally or by a third party.

### Monitoring

The owner/developer will be responsible for appointing a SQE to monitor the success of the ecological features installed on the site.

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The SQE will be responsible for creating a monitoring report that details findings and remedial actions/ updates to the SEE required.

The building owner/developer will keep a record of all monitoring and implement any SEE updates required.

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## 6.0 SUMMARY AND CONCLUSIONS

Greengage was commissioned by TFT Consultants to produce a Scheme of Ecological Enhancements (SEE), detailing ecological enhancement features for the proposed development at Compton Business Park in Watchmoor Point, Camberley, Surrey, to address ecology related Planning Condition 20.

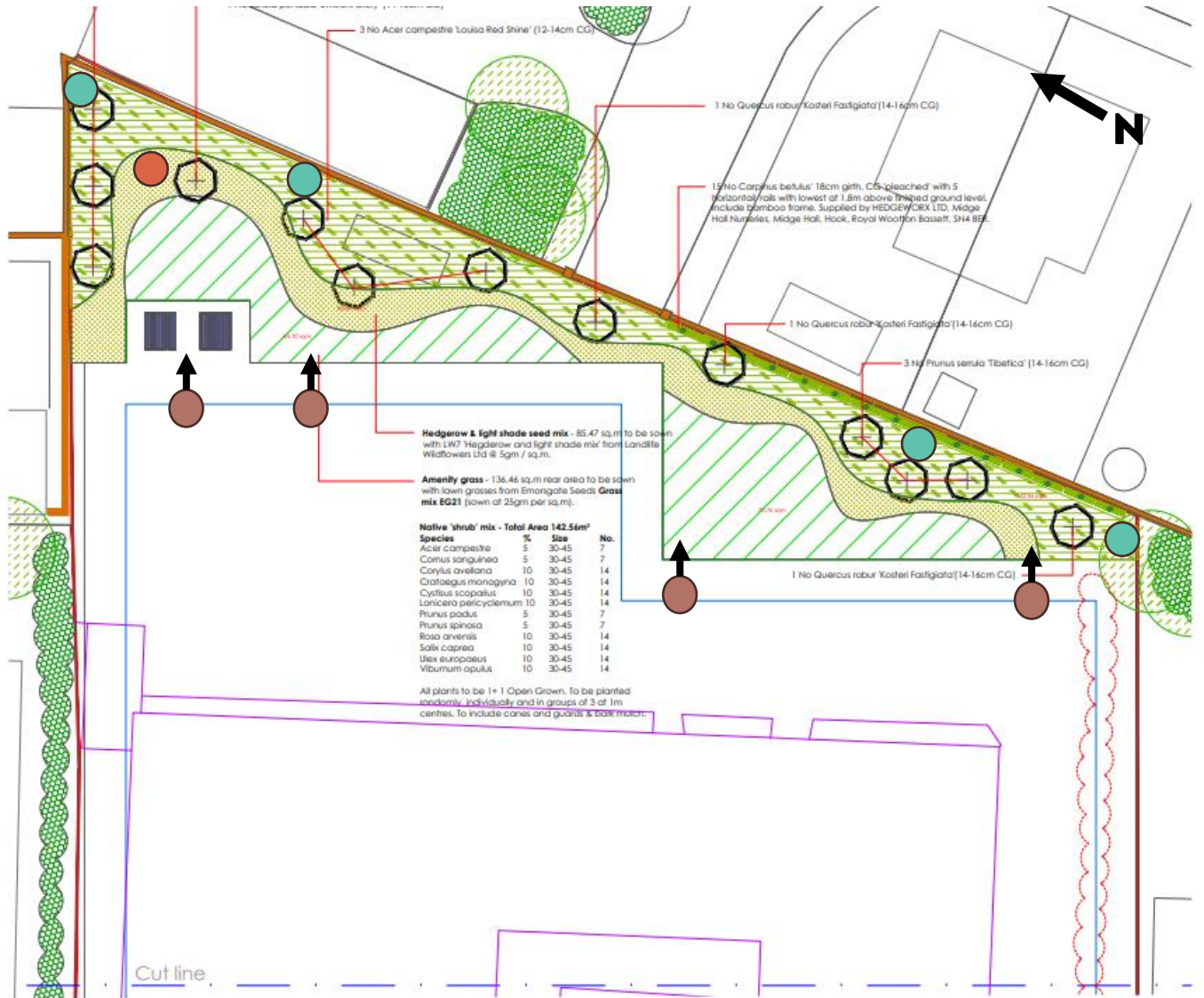
Targeted ecological enhancements have been specified in light of contemporary best practice, local conservation targets (such as BAP priorities), relevant planning policy, and proposed development details. Enhancements have been incorporated into the landscaping proposals and will seek to create habitat suitable for supporting protected, notable and rare ecological receptors, ensuring net gains in biodiversity value.

The baseline ecological assessment determined the existing site to be of low ecological value, with vegetation cover provided by hedgerows as the main feature of biodiversity interest for both bats and birds. Four of the buildings were assessed as displaying low potential for roosting opportunities for bats. Further emergence surveys conducted in 2022 confirmed bats as likely absent from the buildings. Further to the limited baseline value, a number of opportunities to enhance the site were identified through the detailed design evolution to complement the landscaping and building use.

Enhancements for the site include living roofs, wildlife friendly planting, integrated bird and bat boxes in buildings across the site, and on-going wildlife sensitive management.

An increase in ecological value will be delivered in the medium to longer term as a result of the proposed ecological enhancements and site management. Monitoring of the recommended management of the site for biodiversity will occur frequently as will ecological surveys for birds and insects so that lessons can be learnt and shared across other sites where these enhancement features are designed.

## **APPENDIX A SCHEME OF ECOLOGICAL ENHANCEMENTS PLAN**



## Key



Indicative bird box locations and facing direction. Integrated bird boxes will be installed on the north facings of the new building at least 2m high\*, including two swift brick, one sparrow terrace and one general purpose box. \*Swift boxes to be installed in pairs, at least 5m high, and located at the eaves of the building.

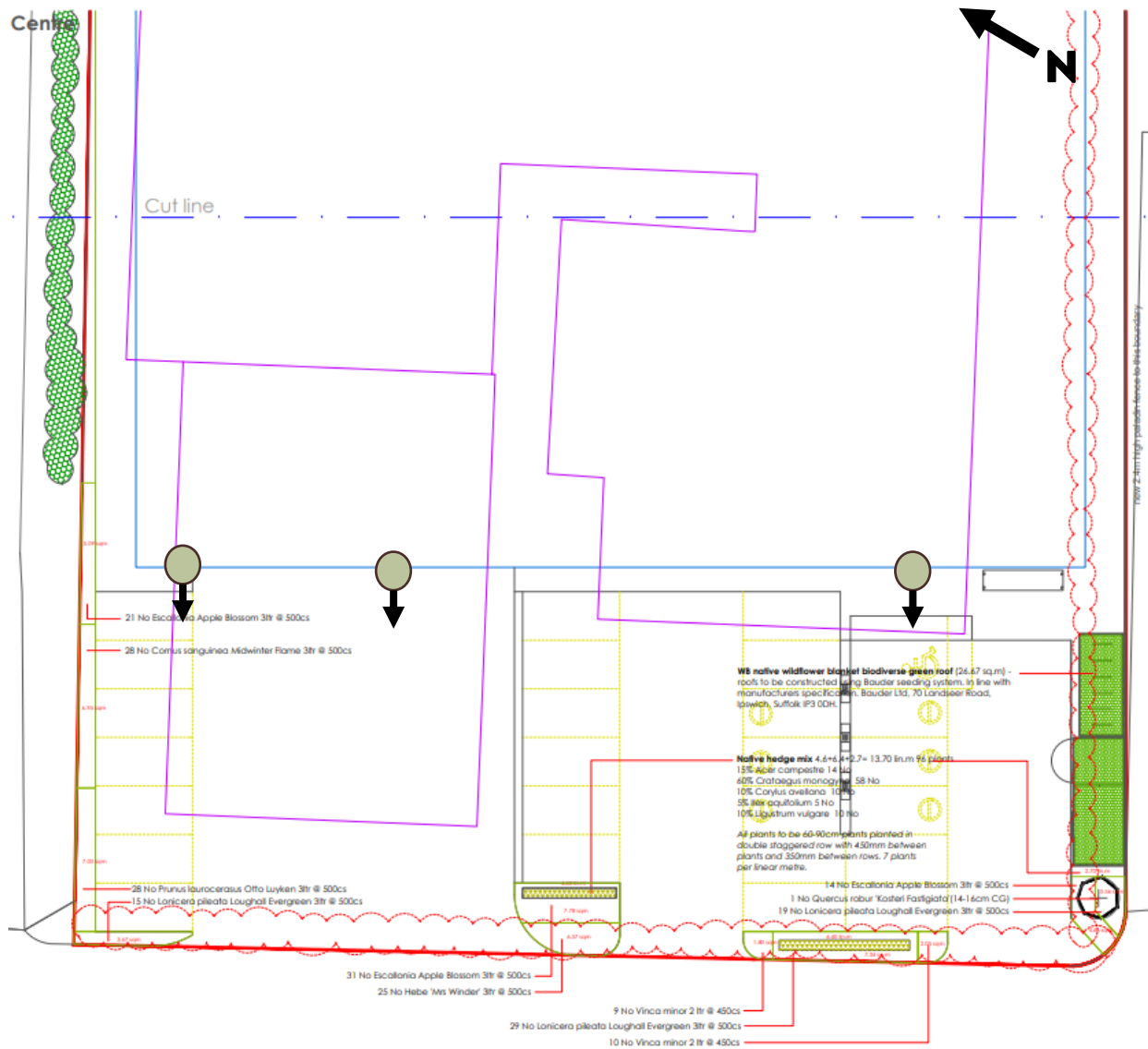


Indicative pollinator post locations (no. 4) to be incorporated to the north of the Site, amongst a mixture of wildlife and pollinator friendly planting.



One loggery to be incorporated to the north of the Site, amongst a mixture of wildlife and pollinator friendly planting.

Potterton Associates Ltd (2022) Landscape Proposals (1 of 2) 910 P02 Revision B

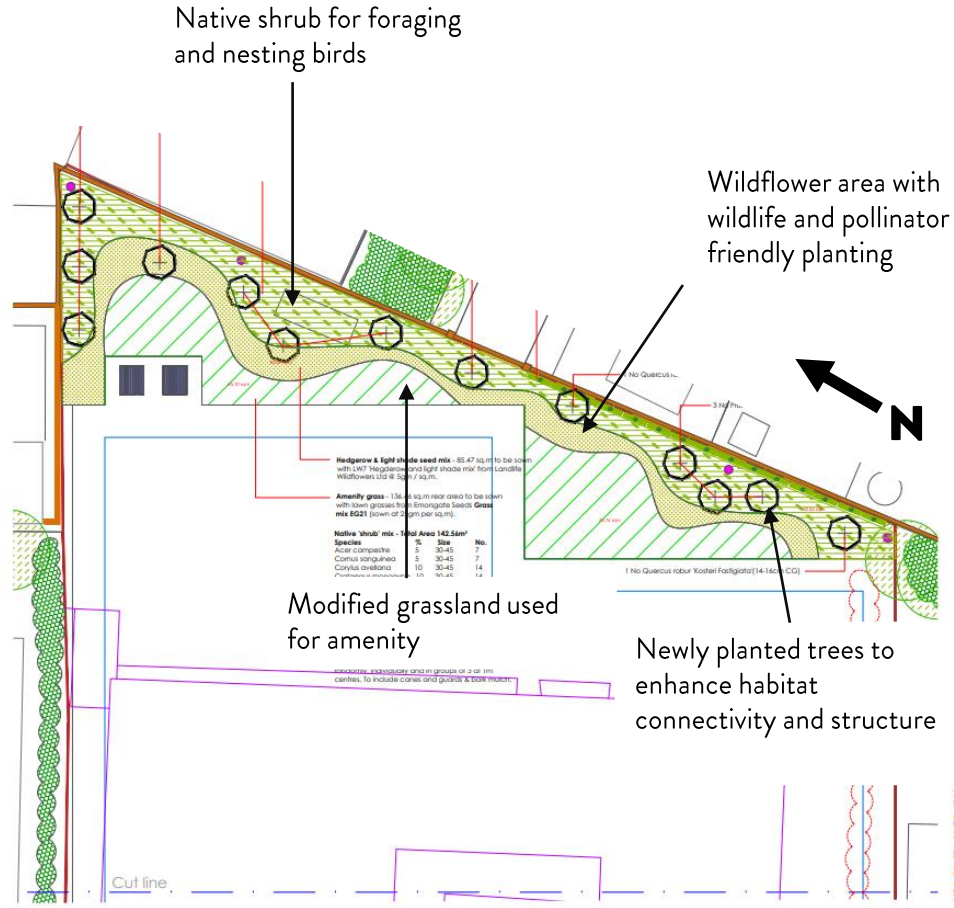


### Key



Indicative bat box locations and facing directions. Three bat boxes will be installed on the south elevation of the building at least 3m high.

Potterton Associates Ltd (2022) Landscape Proposals (2 of 2) 910 P02 Revision B



Potterton Associates Ltd (2022) Landscape Proposals (1 of 2) 910 P02 Revision B

Potterton Associates Ltd (2022) Landscape Proposals (2 of 2) 910 P02 Revision B



# CDM

- Any external features, such as the pollinator posts, should be checked annually and after any period of high winds to ensure they are still securely in place
- All habitat features should be installed by following the provided instructions from the place of purchase
- The locations of habitat features provided in this plan are indicative and should be micro-sited by a suitably qualified ecologist (SQE) on Site before installation
- Whilst Greengage does not officially endorse any products, some suitable examples of habitat features to be used are provided below. Suitable alternatives may be sought.
- If the below products cannot be obtained and external models are required, the suitability of alternative models can be discussed and agreed with the SQE.

## Habitat Features



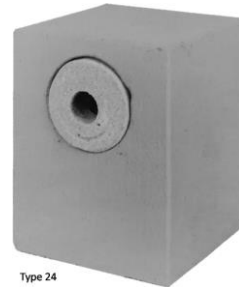
2x Integrated swift boxes  
e.g. Schwegler Lightweight Swift Box Type 1A



1x Integrated sparrow terrace  
e.g. 1SP Schwegler Sparrow Terrace



3x Integrated bat boxes  
e.g. Integrated Eco Bat Box (other colours available)



1x Integrated general purpose box  
e.g. Schwegler Brick Nest Box Type 24



4x External pollinator posts on a podium  
e.g. Nooks & Crannies Insect Hotel

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## APPENDIX B LEGISLATION AND POLICY

### B.1 LEGISLATION

Current key legislation relating to ecology includes the Wildlife and Countryside Act 1981 (as amended)<sup>13</sup>; The Conservation of Habitats and Species Regulations 2019 ('Habitats & Species Regulations')<sup>14</sup>, The Countryside and Rights of Way Act 2000 (CRoW Act)<sup>15</sup>, and The Natural Environment and Rural Communities Act, 2006<sup>16</sup>.

#### The Environment Act, 2021

The Environment Act, 2021 mandates the requirement for new development in England to deliver a minimum 10% biodiversity net gain (BNG), as measured by the agreed metric (the current relevant version being the Defra metric 3.0), secured through planning condition as standard (as per schedule 14 of the Act). Approach to the delivery of BNG must follow the mitigation hierarchy, with avoidance of impact and on-site compensation/gains prioritised, ahead of the use of offsite biodiversity unit offsets, or the purchase of biodiversity credits.

The Act introduces the condition that no development may begin unless a biodiversity net gain plan has been submitted and approved by the local planning authority (LPA).

The Act also amends requirements of the NERC Act, 2006, adding the need to not just conserve, but enhance biodiversity through planning projects. Furthermore, it introduces the need for the LPA to have regard to relevant local nature recovery strategies and relevant species/protected site conservation strategies, when making their decision.

#### The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019

The Conservation of Habitats & Species Regulations replace The Conservation (Natural Habitats, etc.) Regulations 1994 (as amended)<sup>17</sup>, and transpose Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora ('EU Habitats Directive')<sup>18</sup>, and Council Directive 79/409/EEC on the Conservation of Wild Birds ('Birds Directive')<sup>19</sup> into UK law (in conjunction with the Wildlife and Countryside Act).

Regulation 43 and 47 respectively of the Conservation of Habitats & Species Regulations makes it an offence (subject to exceptions) to deliberately capture, kill, disturb, or trade in the animals listed in Schedule 2 (European protected species of animals), or pick, collect, cut, uproot, destroy, or trade in the plants listed in Schedule 5 (European protected species of plant). Development that would contravene the protection afforded to European protected species requires a derogation (in the form of a licence) from the provisions of the Habitats Directive.

Regulation 63 (1) states: 'A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which –

(a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects); and

(b) is not directly connected with or necessary to the management of that site;

must make an appropriate assessment of the implications for that site in view of that site's conservation objectives.'

## Wildlife and Countryside Act 1981 (as amended)

The Wildlife and Countryside Act 1981 (as amended) is the principal mechanism for the legislative protection of wildlife in Great Britain. This legislation is the means by which the Convention on the Conservation of European Wildlife and Natural Habitats<sup>20</sup> (the 'Bern Convention') and the Birds Directive and EU Habitats Directive are implemented in Great Britain.

## The Countryside and Rights of Way Act 2000

The Wildlife and Countryside Act has been updated by the CRoW Act. The CRoW Act amends the law relating to nature conservation and protection of wildlife. In relation to threatened species it strengthens the legal protection and adds the word 'reckless' to the offences of damaging, disturbing, or obstructing access to any structure or place a protected species uses for shelter or protection, and disturbing any protected species whilst it is occupying a structure or place it uses for shelter or protection.

## The Natural Environment and Rural Communities Act 2006

The Natural Environment and Rural Communities Act 2006 states that every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity. Biodiversity Action Plans provide a framework for prioritising conservation actions for biodiversity.

Section 41 of the Natural Environment and Rural Communities Act requires the Secretary of State to publish a list of species of flora and fauna and habitats considered to be of principal importance for the purpose of conserving biodiversity. The list, a result of the most comprehensive analysis ever undertaken in the UK, currently contains 1,149 species, including for example, hedgehog (*Erinaceus europaeus*), and 65 habitats that were listed as priorities for conservation action under the now defunct UK Biodiversity Action Plan<sup>21</sup> (UK BAP). Despite the devolution of the UK BAP and succession of the UK Post-2010 Biodiversity Framework<sup>22</sup> (and Biodiversity 2020 strategy<sup>23</sup> in England), as a response to the Convention on Biological Diversity's (CBD's) Strategic Plan for Biodiversity 2011-2020<sup>24</sup> and EU Biodiversity Strategy (EUBS)<sup>25</sup>, this list (now referred to as the list of Species and Habitats of Principal Importance in England) will be used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under section 41 of the Natural Environment and Rural Communities Act 2006 'to have regard' to the conservation of biodiversity in England, when carrying out their normal functions.

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## Biodiversity Action Plans

Non-statutory Biodiversity Action Plans (BAPs) have been prepared on a local and regional scale throughout the UK over the past 15 years. Such plans provide a mechanism for implementing the government's broad strategy for conserving and enhancing the most endangered ('priority') habitats and species in the UK for the next 20 years. As described above the UK BAP was succeeded in England by Biodiversity 2020 although the list of priority habitats and species remains valid as the list of Species of Principal Importance for Nature Conservation.

Regional and local BAPs are still valid however and continue to be updated and produced.

Detail on the relevant BAPs for this site are provided in the main text of this report.

## Legislation Relating to Nesting Birds

Nesting birds, with certain exceptions, are protected from intentional killing, destruction of nests and destruction/taking of eggs under the Wildlife and Countryside Act 1981 (as amended) and the CROW Act. Any clearance of dense vegetation should therefore be undertaken outside of the nesting bird season, taken to run conservatively from March to August (inclusive), unless an ecologist confirms the absence of active nests prior to clearance.

## Legislation Relating to Bats

All UK bats and their roosts are protected by law. Since the first legislation was introduced in 1981, which gave strong legal protection to all bat species and their roosts in England, Scotland and Wales, additional legislation and amendments have been implemented throughout the UK.

Six of the 18 British species of bat have Biodiversity Action Plans (BAPs) assigned to them, which highlights the importance of specific habitats to species, details of the threats they face and proposes measures to aid in the reduction of population declines.

Although habitats that are important for bats are not legally protected, care should be taken when dealing with the modification or development of an area if aspects of it are deemed important to bats such as flight corridors and foraging areas.

The Wildlife & Countryside Act 1981 (WCA) was the first legislation to provide protection for all bats and their roosts in England, Scotland and Wales (earlier legislation gave protection to horseshoe bats only.)

All eighteen British bat species are listed in Schedule 5 of the Wildlife and Countryside Act, 1981 and under Annex IV of the Habitats Directive, 1992 as a European protected species. They are therefore fully protected under Section 9 of the 1981 Act and under Regulation 43 of the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, which transposes the Habitats Directive into UK law. Consequently, it is an offence to:

- Deliberately capture, injure or kill a bat;
- Intentionally or recklessly disturb a bat in its roost or deliberately disturb a group of bats;

- Damage or destroy a bat roosting place (even if bats are not occupying the roost at the time);
- Possess or advertise/sell/exchange a bat (dead or alive) or any part of a bat; and
- Intentionally or recklessly obstruct access to a bat roost.

This legislation applies to all bat life stages.

The implications of the above in relation to the proposals are that where it is necessary during construction to remove trees, buildings or structures in which bats roost, it must first be determined that work is compulsory and if so, appropriate licenses must be obtained from Natural England.

## Legislation Relating to Reptiles

All species of reptile native to the UK are protected to some degree under national and/or international legislation, which provides mechanisms to protect the species, their habitats and sites occupied by the species.

Sand lizards and smooth snakes are European protected species and are afforded full protection under Section 9 of the Wildlife and Countryside Act 1981 and Regulation 43 of the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. However, these species are rare and highly localised. Their occurrence is not considered as relevant in this instance, as the ranges and specialist habitats of these species do not occur at this site.

The remaining widespread species of native reptiles (adder, grass snake, slow worm and viviparous lizard) are protected under part of Section 9(1) and all of Section 9(5) of the Wildlife and Countryside Act 1981. They are protected against intentional killing and injury and against sale, transporting for sale etc. The habitat of these species is not protected. However, in terms of development, disturbing or destroying reptile habitat during the course of development activities while reptiles are present is likely to lead to an offence under the Wildlife and Countryside Act 1981. It is therefore important to identify the presence of these species within a potential development site. If any of these species are confirmed, all reasonable measures must then be taken to ensure the species are removed to avoid the threat of injury or death associated with development activities.

Each species of native reptile has specific habitat requirements but general shared features include a structurally diverse habitat that provides for shelter, basking, foraging and hibernating.

All reptiles are BAP species and as such are also of material consideration in the planning process due to the NPPF.

## Legislation Relating to Dormice

Dormice are given full protection under Schedule 5 of the Wildlife and Countryside Act 1981, as amended. Protection to the species is also afforded by Regulation 43 of the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, making the hazel dormouse a European Protected Species. These two pieces of legislation operate in parallel, although there are some small

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differences in scope and wording. Under the provisions of Section 9 of the Wildlife & Countryside Act, it is an offence to:

- Intentionally kill, injure or take a dormouse;
- Possess or control and live or dead specimen or anything derived from a dormouse (unless it can be shown to have been legally acquired);
- Intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection by a dormouse; and
- Intentionally or recklessly disturb a dormouse while it is occupying a structure or place which it uses for that purpose.

Regulation 43 of the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 makes it an offence to:

- Deliberately capture or kill a dormouse;
- Deliberately disturb a dormouse;
- Damage or destroy a breeding site or resting place of a dormouse; and
- Keep transport, sell or exchange, or offer for sale or exchange a live or dead dormouse or any part of a dormouse.

## Legislation Relating to Great Crested Newts

Great crested newts are given full protection under Schedule 5 of the Wildlife and Countryside Act 1981, as amended. Protection to the species is also afforded by Regulation 43 of the Conservation of Habitats and Species Regulations 2019, making the great crested newt a European Protected Species. These two pieces of legislation operate in parallel, although there are some small differences in scope and wording. Under the provisions of Section 9 of the Wildlife & Countryside Act, it is an offence to:

- Intentionally kill, injure or take a great crested newt;
- Possess or control and live or dead specimen or anything derived from a great crested newt (unless it can be shown to have been legally acquired);
- Intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection by a great crested newt; and
- Intentionally or recklessly disturb a great crested newt while it is occupying a structure or place which it uses for that purpose.

Regulation 43 of the Conservation of Habitats and Species Regulations 2019 makes it an offence to:

- Deliberately capture or kill a great crested newt;
- Deliberately disturb a great crested newt;
- Damage or destroy a breeding site or resting place of a great crested newt; and

- Keep transport, sell or exchange, or offer for sale or exchange a live or dead great crested newt or any part of a great crested newt.

## Legislation Relating to Natura 2000 Sites and Habitats Directive Annex I/II Species

European Commission Council Directive 92/43/EEC on the Conservation of Natural Habitats and Wild Fauna and Flora ('EU Habitats Directive'), and Council Directive 79/409/EEC on the Conservation of Wild Birds ('Birds Directive') form the cornerstones of nature conservation legislation across EU member states. Priority species requiring protection across Europe are listed in the Annexes of these Directives. Regulation 63(1) of the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 and Offshore Marine Conservation Regulations, 2007 (as amended) transpose these directives into UK law and set the basis for the designations of protected sites (known as Natura 2000 sites; Special Areas of Conservation under the Habitat Directive and Special Areas of Protection under the Birds Directive) that are of importance for habitats, species or assemblages listed on the directive Annexes. In the UK Ramsar sites are also offered the same level of protection as SPAs and SACs however the qualifying species for the designation may differ; Ramsar sites being designated specifically as important wetland habitats.

Under article 6(3) of the Habitats Directive, where projects stand to have likely significant effect (in accordance with the European Court of Justice ruling of C-127/02 Waddenzee cockle fishing) upon the integrity of conservation objectives (i.e. conservation status of the qualifying species or habitats) within the designated sites then the Competent Authority must undertake an Appropriate Assessment.

## B.2 PLANNING POLICY

### National

#### National Planning Policy Framework

The National Planning Policy Framework (NPPF) 2021<sup>26</sup> sets out the Government's planning policies for England, including how plans and decisions are expected to apply a presumption in favour of sustainable development. Chapter 15 of the NPPF focuses on conservation and enhancement of the natural environment, stating plans should 'identify and pursue opportunities for securing measurable net gains for biodiversity'.

It goes on to state: 'if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused'. Alongside this, it acknowledges that planning should be refused where irreplaceable habitats such as ancient woodland are lost.

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## Local

### Surrey Heath Borough Council

#### *Policy E2 Biodiversity and Geodiversity<sup>27</sup>*

"1) Development proposal will be permitted where they will not have an adverse impact on biodiversity and/or geodiversity. Where harm or loss cannot be avoided, mitigation will be required such that it can be robustly demonstrate that:

- a) there will be no adverse effect on the integrity of international, national and local designated sites;
  - b) there will be no adverse impact on the conservation status of priority species;
  - c) there will be no loss or deterioration of a priority habitat type, and/or irreplaceable habitat;
  - d) there will be no adverse impact on the conservation objectives of Biodiversity Opportunity Areas;
- and
- e) there will be no adverse effect on the integrity of linkages between designated sites and priority habitats.

2) The weight attributed to the protection of nature conservation interests will be commensurate to their status and significance, and any other designation applying to the site, habitat or species concerned. For proposals that affect nationally protected sites, very special circumstances would be required to robustly demonstrate that the benefits of the development proposal clearly outweigh the loss or harm and that appropriate compensation will be sought.

3) Effective avoidance, mitigation and compensation will be secured through the imposition of planning conditions or planning obligations as appropriate, including monitoring for the effectiveness of these measures.

4) Development proposals, where appropriate, will need to take full account of the impact on soils. Development will be expected to avoid the best and most versatile agricultural land. Areas of lower quality agricultural land should be used for development in preference to the best and most versatile agricultural land".

#### *Policy E3 Biodiversity Net Gain<sup>28</sup>*

"1) Development proposals will be permitted provided that they can demonstrate the provision of a minimum 20% increase in biodiversity units when set against the baseline biodiversity value and are in accordance with national guidance. This may include the creation, restoration, enhancement and subsequent maintenance of habitats and features. In cases where requisite/required/adequate on-site net gain provision is demonstrated not to be achievable, off site provision should be provided.

2) Development proposals should seek to similarly provide environmental net gain, in accordance with national guidance. Development proposals will be expected to provide suitable ecological survey information and assessment to establish biodiversity net gains and the extent of any potential impact on ecological features."



## REFERENCES

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- <sup>16</sup> HM Government, (2006); Natural Environment and Rural Communities Act 2006. HMSO
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