

# James Johnston Ecology

BSc MSc MIEEM CEnv  
VAT 928 3295 00

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UNIT 7, WORNAL PARK,  
WORMINGHALL, HP18 9PH

PRELIMINARY ECOLOGY APPRAISAL

15<sup>th</sup> January 2024

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High Planes, English Bicknor, Coleford, Glos. GL16 7PD

[jjecology@outlook.com](mailto:jjecology@outlook.com)

07734 171738

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Habitats (JJ821 15/01/24) *Hand-drawn*

Mitigation + Enhancement (JJ821 17/01/24) *Hand-drawn*

## EXECUTIVE SUMMARY AND CONCLUSIONS

JJE has conducted a preliminary ecology appraisal including records search, daylight walkover survey, and buildings inspection / preliminary bat survey, at Unit 7, Wornal Park, Worminghall, where re-development of part of the existing business park is proposed.

The appraisal found no past records of notable fauna at the site; The habitats present are very common types with low ecology value (mainly modern industrial buildings, concrete hard-standing, and one narrow strip of short-mown amenity grassland, plus some boundary woodland (which is retained within the proposals)).

The preliminary fauna appraisal concluded no potential for rare birds to nest, although small common birds could nest in some ivy on sheds; The buildings have no evidence of bat roosts, and the architecture has no potential for supporting hidden crevice-type bat roosts, and so overall there is no potential for bat roosts and no requirement for further detailed bat survey; The habitat of the site offers negligible opportunity for reptiles or great crested newts, and there are no old field ponds within 500m, and so negligible chance of newts ever residing or passing through the application site. The tiny area of amenity grassland impacted is too small and distant from ponds to trigger any requirements for Newt Derogation Licensing.

A precautionary ecology mitigation and enhancement strategy has been included within the proposals and within this report, to avoid minor issues such as disturbance of nesting birds. Enhancement includes alterations to grassland management within the wider site to encourage insects; Small new areas of species-rich grassland; Two new fruit trees; 20m of new native hedgerow; and a range of bird and bat boxes onto boundary trees. No further detailed (phase 2) fauna surveys are required for this appraisal. Overall ecology impacts will be negligible, and net enhancement occurs.

The recommendations can be guaranteed using a Planning Condition linked to this report, and so it is concluded the scheme will not contravene wildlife laws or ecology policy.

## 1.0 INTRODUCTION AND BACKGROUND

This report has been prepared by *James Johnston Ecology*, on behalf of the site owner (Andrew Dent). It provides the results of an ecological walkover survey and 'Preliminary Ecology Appraisal / PEA', including preliminary bat survey, undertaken across part of the Business Park site and buildings affected by proposals for re-development of Unit 7. The proposal is to remove some small sheds and also the larger Unit 7 building, and construct two larger blocks of industrial buildings, including a cafe. This report supports the planning application by providing an initial or preliminary ecology appraisal, including a precautionary mitigation strategy and confirmation regarding any need for further detailed fauna surveys to be conducted and fed into the assessment process.

Potential impacts to protected species or ecologically valuable habitats are a 'material consideration' within the planning decision. British reptile species are protected from 'intentional' and 'reckless' harm and disturbance, under the Wildlife and Countryside Act 1981 (as amended 1985 and 2000), and great crested newts (GCN) and bats (and their places of shelter) are also protected under the Conservation Regulations 2017/19. British birds are also protected from disturbance through the Wildlife and Countryside Act 1981, while actively nesting.

If found to be using such sites, a mitigation strategy should be designed by an appropriately qualified and experienced Ecologist (avoiding harm and adverse impacts to the protected fauna). If GCNs or bats, or their places of shelter are impacted then a Derogation Licence is first required from Natural England prior to construction work starting.

The remainder of this report presents the appraisal Methods, Findings, Assessment, and Mitigation and Enhancement. Photographs are interspersed in the text to help set the context and show the features, and the plans at the rear of the report include 'Habitats', and 'Mitigation + Enhancement'.

## 2.0 METHODS

**Records Search** – A data trawl / ecology records search was undertaken (seeking any past records of legally protected species at the site and within 1km), through the Bucks and Milton Keynes Environmental Records Centre (BMERC). Information on statutory nature conservation designations was gathered through a web-search (Natural England's 'nature on the map' website / DEFRA.MAGIC). The writer also has significant past experience of the notable fauna of this part of the country from 'scores' of ecology and fauna surveys conducted in the region over the last 28 years for other planning applications.

**Walkover Survey** – An 'ecology walkover survey' / 'extended phase 1 habitat survey' was undertaken by James Johnston on 11/05/23. This involved walking the site and its boundaries, noting the principal habitats, noting any evidence of fauna, and assessing the features for their potential to support notable or legally protected species. Incidental bird observations were noted. Habitats are reviewed for their potential to support great crested newts, based on habitat type and proximity to suitable ponds, and the affected buildings were subject to an internal and external inspection / preliminary bat survey.

**Preliminary Bat Survey Method** - A preliminary bat roost appraisal was conducted in line with the published BCT 2016 guidelines 'Bat Surveys for Professional Ecologists', initially for a 'preliminary bat survey' - comprising records search plus a daylight search for roost evidence (especially around beams and internal crevices, barge board gaps, and around any other architectural recesses, attics, etc). A ladder, bright torches and an endoscope were used for close inspection. Evidence looked for includes crevices or roof areas swept free of cobwebs, 'polishing' of crevice edges from oils rubbed off the fur of bats, stains/scratch marks, bat droppings, bats themselves, and discarded moth wings. These guidelines indicate that a daylight inspection is an appropriate starting point for appraisal, but that further detailed summer dusk bat surveying should be 'marked forward' if bat roost evidence or

potential for hidden roosts is confirmed. If bat droppings are found they are usually sent for DNA analysis to confirm the species, although in this instance none were found.

**Personnel** – The survey and appraisal was conducted by James Johnston (MCIEEM / CEnv), a Consultant Ecologist and ‘bat-specialist’ with 28 years habitat and fauna survey experience, who holds current survey licences for great crested newts, and bats (bat licence 2015:11566:cls:cls).

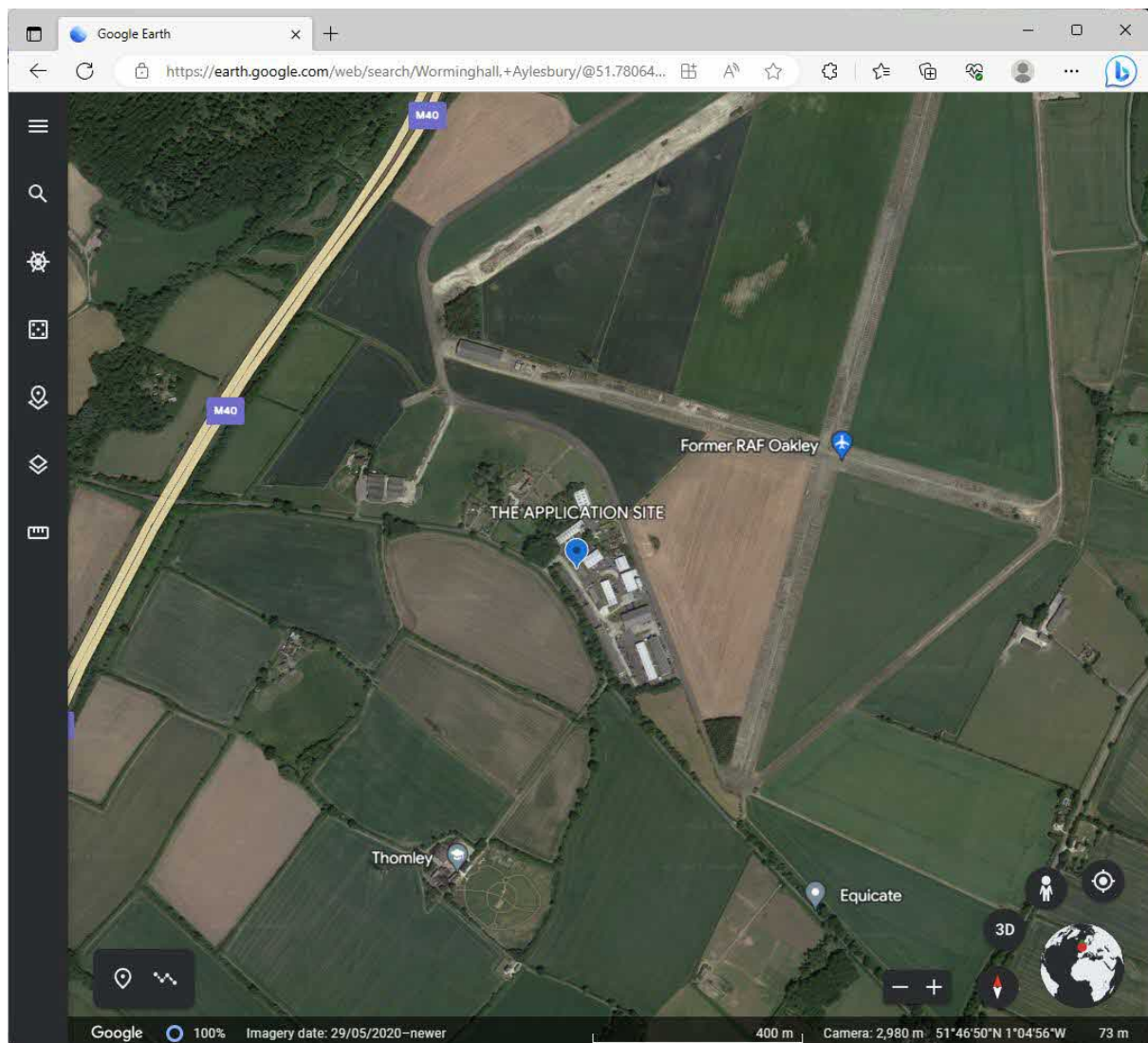
**Weather** – The weather during the survey (11/05/23) was acceptable for reliable appraisal (Dry, mixed sun and cloud, with temperatures (max/min) of +16 to +10°C, and a 15 mph south-westerly wind).

**Limitations** - Ecology survey work can only present a ‘snap-shot’ of the ecology conditions at that time. Site conditions and fauna usage patterns can change over short timeframes and so new or altered ecology constraints in the near future can be different from the recent past. Detailed fauna surveys also only ever represent a sampling exercise, and so there is always an opportunity for some fauna usage to go unnoticed, particularly any rare or sporadic site usage by elusive fauna. Nevertheless, significant field experience, use of accepted standard survey equipment, and appraisal methods (as above) allow these limitations to be sufficiently reduced. No additional, unusual or significant limitations were encountered, and all parts of the site and buildings affected by this planning application were successfully entered and surveyed.

## 3.0 FINDINGS

### Surroundings

The Business Park site lies in the open countryside, immediately surrounded by intensive agriculture (arable and ley grasslands), as can be seen in the aerial photo below (with application site central and marked with a blue pointer). There is mature woodland within 1km, but this is on the far side of the M40 motorway. The local hedgerow network is relatively poor, and field ponds are very scarce in this farmland. Overall, the broad area (local landscape) supports habitats and opportunities that give the potential for a limited range of notable fauna including reptiles, farmland birds of conservation concern, and a range of the more common bat species.

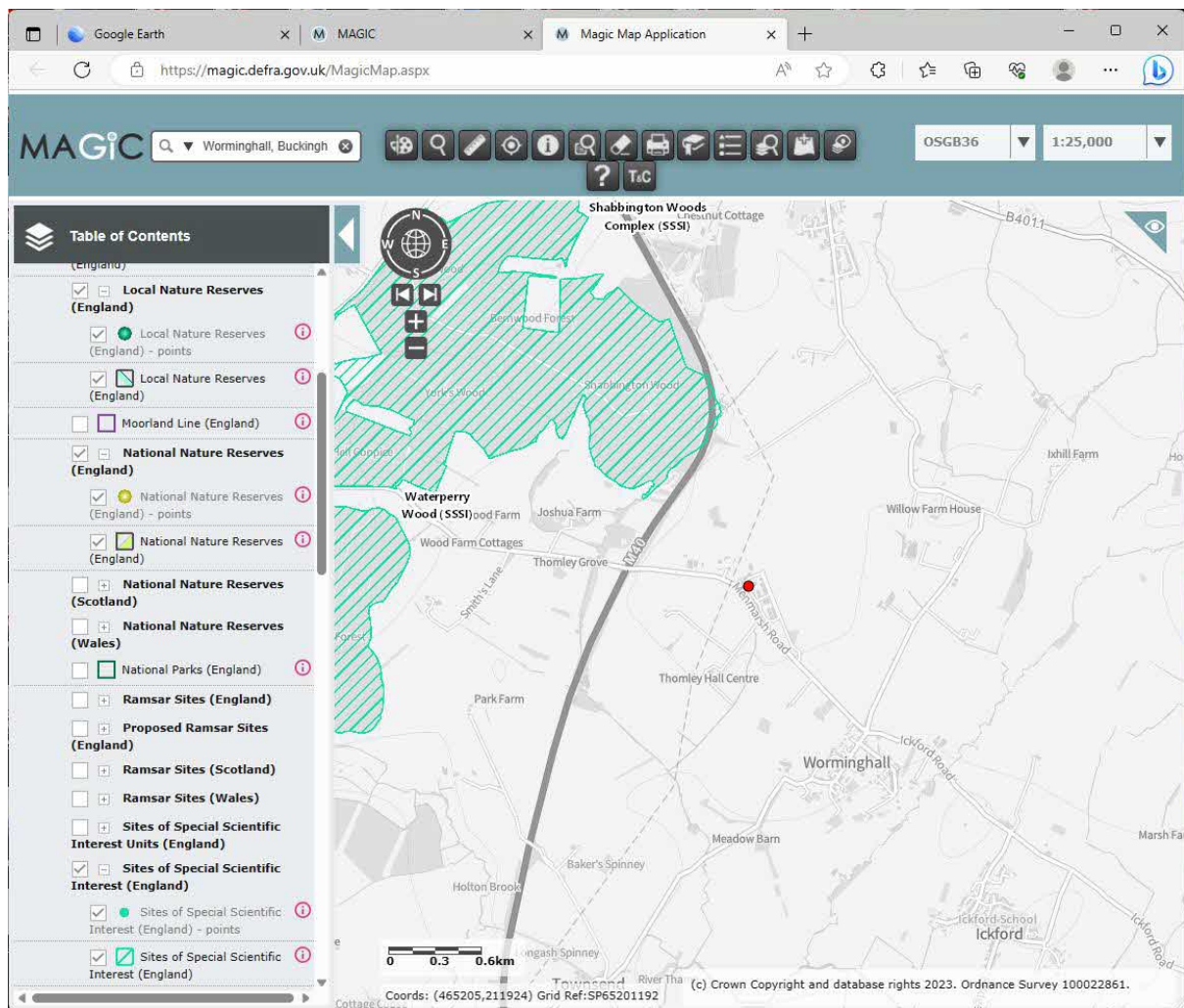


*Aerial photo courtesy of Google Earth (site centred)*



## Nature Conservation Designations

**Statutory** – There are no statutory designations (or any local designations) within or adjacent to the application site (none within 1km), but within 1-3km are the east edges of the Shabbington Woods Complex SSSI; and the Waterperry Wood SSSI. These are both on the far side of the M40 motorway from the application site (as can be seen on the map below), and are designated for their ancient woodland habitat.



Statutory designations within 3km of application site (which is marked with a red dot)



## **Buildings / Structures**

The application site supports three buildings / structures. Building 'A' (on the Habitats plan) is a small and low rendered brick storage / plant room, with a mono-slope corrugated cement board roof, and no ceiling or attic space. This has ivy growing up one external wall (as shown below).



*Above photos are Building 'A'*



Building / structure 'B' is simply an open-topped brick-walled square bund for a former diesel tank that is no longer present (immediately adjacent to Building 'A'). Inside this walled area the floor is concrete, but soil has been developing on the concrete, from past leaf-fall turning to compost, and this is now allowing some pioneer herbs to establish (principally bramble and an ash tree sapling).



*Photos on this page are building / structure 'B'*



Building 'C' is Unit 7 of Wornal Park, a long single-storey former industrial unit (probably with military origins), and modified in recent years to become offices. This has rendered and painted brick walls, and a corrugated metal roof which has been re-clad over the top with corrugated cement board, all supported by metal roof beams. There is a low (well-sealed) attic space (1.3m tall) over the whole ground floor space, with several ceiling hatches allowing access, and glasswool insulation on the attic floors.



*Photos on this page are all Building 'C'*

## On-Site Habitats

Habitat around the application site is very poor / sparse, with most of the site area taken up by the buildings and the concrete and tarmac parking areas and access road. The only vegetation is an 8m wide strip of short-mown amenity grass along the eastern boundary. This comprises a limited sward that is constantly mown to only 5cm height, and which supports perennial ryegrass, plantains, daisy, dutch clover, annual meadow-grass, and creeping cinquefoil. This is likely to have been sown as amenity grass as part of the landscaping strategy relating to the business park development, and now is best described as a linear lawn feature.



*Short amenity grass / linear lawn in east of application site, and large areas of hard-standing*



**Boundary Trees + Scrub** – On the eastern boundary is a 6-8m wide strip of mature ornamental woodland planting / earlier landscape planting, comprising horse chestnut, Norway maple, elm, field maple, elder, hawthorn and privet. The ground-flora is very poor and is dominated by dense smothering ivy. There are also two mature planted silver birch trees close to the northern boundary.



*North boundary silver birch trees, and east boundary ornamental woodland belt*

## **Fauna**

**BMERC Records** – BMERC confirmed no past records of legally protected species at the application or within 1km, including no records of great crested newts, reptiles, or bat roosts. They do hold some records of notable / declining fauna from land around 0.5 – 1km away (within the surrounding farmland and the disused airfield land to the north-east), including the following birds:

Sparrowhawk, Sedge Warbler, Skylark, Mallard, Meadow Pipit, Swift, Short-eared Owl, Canada Goose  
Dotterel, Greenfinch, Black-headed Gull, Stock Dove, Woodpigeon, Rook, Cuckoo, Whitethroat  
Mute Swan, House Martin, Corn Bunting, Yellowhammer, Reed Bunting, Merlin, Peregrine, Hobby  
Kestrel, Snipe, Moorhen, Herring Gull, Common Gull, Lesser Black-backed Gull, Great Black-backed Gull  
Linnet, Red Kite, Yellow Wagtail, Yellow Wagtail, Spotted Flycatcher, Curlew, Wheatear, House Sparrow  
Grey Partridge, Willow Warbler, Whinchat, Common Tern, Turtle Dove, Tawny Owl, Starling, Greenshank  
Wren, Redwing, Song Thrush, Fieldfare, Ring Ouzel, Mistle Thrush, Lapwing.

**Preliminary Bats (roost evidence and/or potential)** – During the daylight inspection of the buildings and structures by an experienced and qualified bat-specialist surveyor (internally and externally), no bat roost evidence was found anywhere (no bats seen, bat droppings, insect remains, or other potential bat evidence). Items that had apparently been stored in the outbuildings for some years (with dust on them), were closely inspected and no bat droppings were present. The appraisal also must consider the potential for hidden crevice roosts, where for instance a pipistrelle might roost without leaving daylight evidence. However, in this instance the buildings and structures were found to have no potential to support hidden crevice roosts, because no suitable roost gaps are associated with them. The attic spaces were all clean, free of bat evidence, and were well-sealed up against draughts, making bat access impossible; and the roofs have no associated gaps suitable for bat roosts. Barge boards were noted as having been cement-rendered beneath, removing any potential for bat roost gaps behind them (or if a gap was seen, it was closely inspected and found to be only 5mm or less in width, which is too small for potential bat entry by any UK bat species). Some sample photos are below / over-page.





*Rendered / sealed attic space with no bat evidence*

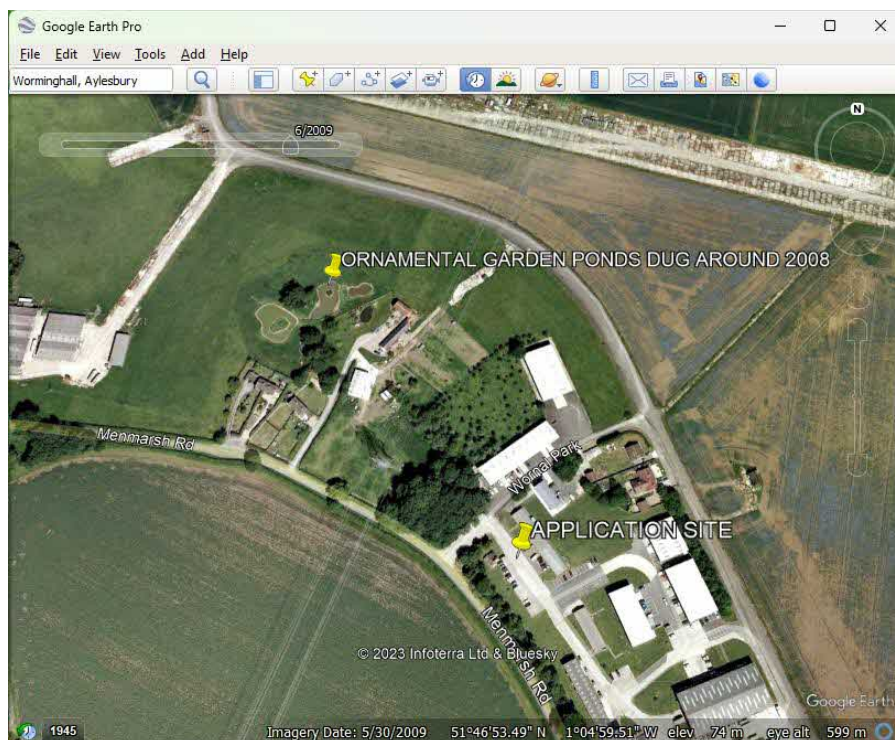


*Roof flashing gap less than 5mm wide, with no bat evidence and no potential for bat entry*



**Birds** – During the walkover survey no active bird nests were seen, but the ivy growing externally on Building ‘A’ was considered to provide good potential for a small nest by small birds such as wrens or blue tits (giving potential for an active nest during their March to August nesting season). Similarly, the lack of disturbance within Building ‘B’ and the provision of bramble and saplings self-seeded inside, gives some potential for small common birds to nest in that feature in future spring/summer periods. No evidence of rare or Schedule 1 protected bird species was found anywhere on-site (eg – no barn owls).

**Reptiles + Newts** – There are no past records of reptiles or great crested newts from the site or within 1km, and the habitats of the application site (short lawn and hard-standing) are very unsuitable for them, due to the lack of cover / shelter and lack of structural and botanical diversity. The aerial photo below shows the only ponds within 500m, and these are ornamental garden ponds, dug around 2008, which are located 200m away to the north-east. There were no old fields ponds in this area previously, and so no potential GCN population here to act as a source for colonising these garden ponds. There is considered negligible risk of reptiles or newts ever residing within, passing through, or resting up within this application site.



**Other Fauna** – No badger evidence was found anywhere on site.

## **Evaluation**

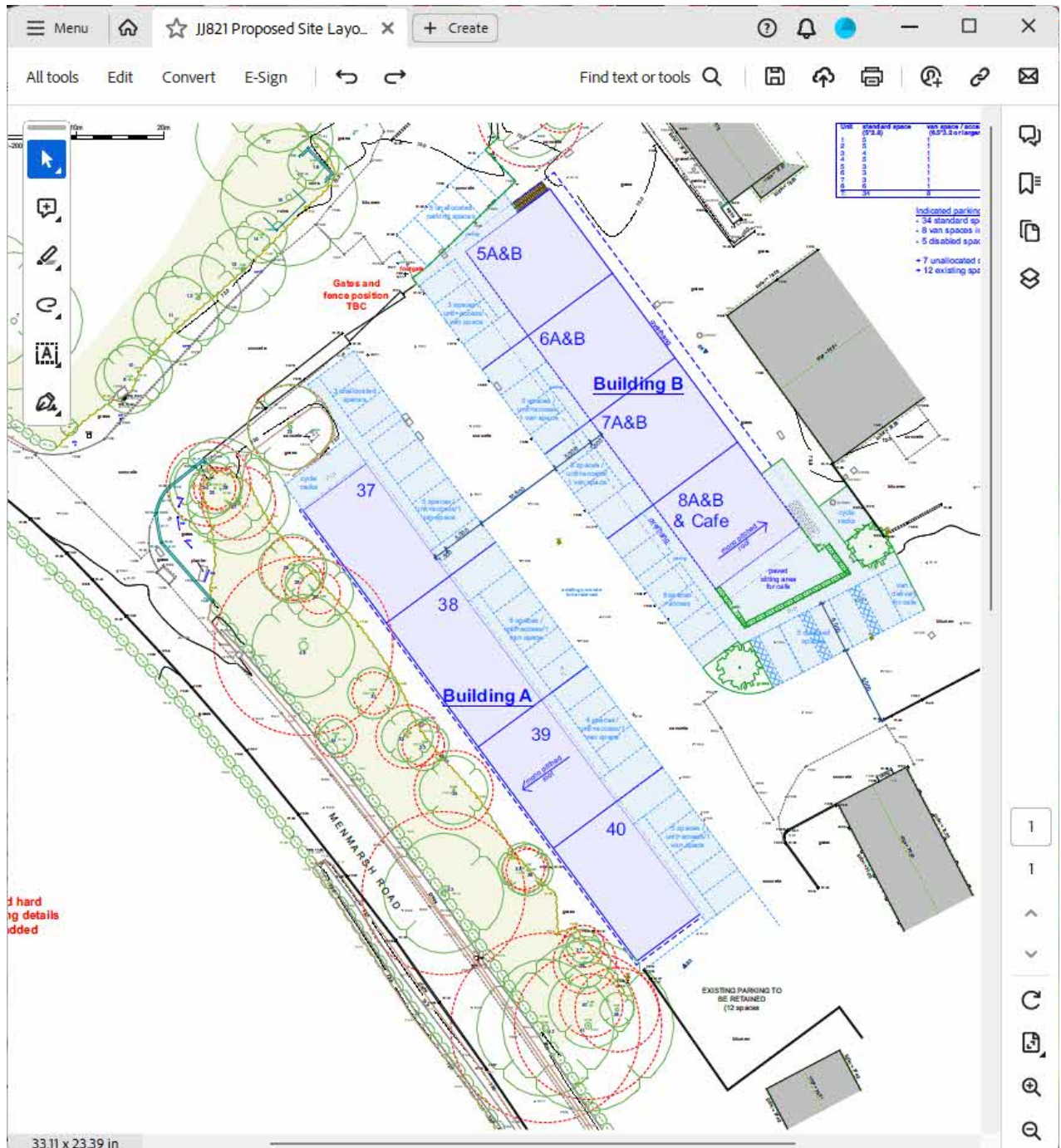
The preliminary ecology study concludes that the application site supports common habitat types of low botanical and structural diversity (buildings, hard-standing, ornamental boundary treeline, and a patch of linear species-poor short amenity grassland). These habitats are very common, low diversity, and are easily re-creatable in the short term (except for the boundary trees). They are of low ecological value.

No evidence of, or potential for, legally protected species was found, or nesting activity by any rare bird species, or any potential for bat roosts, and there is considered no requirement for further detailed (phase 2) fauna surveys, to support this appraisal.

## 4.0 ASSESSMENT

### The Scheme

The scheme involves demolition of buildings A, B and C, and construction of two blocks of replacement industrial units, including a cafe, as shown below.



*The proposed layout*

## **Potential Impacts**

**Designations** – There are no adjacent designated sites to receive any impacts, and no potential for this type of minor re-development scheme to cause any adverse impacts to the more distant designated sites.

**Habitat** – The scheme causes no damage to (or loss of) any notable or ecologically high value habitat. The boundary woodland will all remain, although one small silver birch tree requires removal on the north boundary. There could be a slight risk of insensitive work practices causing damage to retained boundary trees, but this is readily avoided through the standard tree protection Planning Condition.

In terms of green space and biodiversity this scheme causes negligible biodiversity loss, as only a 5m wide strip of short-mown amenity grass is lost to one of the new buildings, in the east. The majority of the construction work will be sited within existing hard-standing areas.

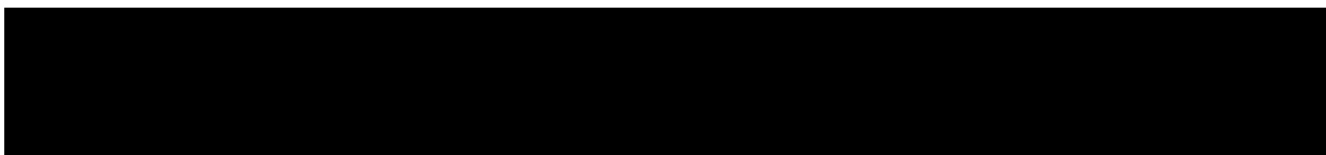
**Bats** – The inspection and the building types and their architecture give no potential for bat roosts to be present, and so there is no risk of the scheme causing bat roost impacts. There is also no potential for other potential bat impacts, such as loss of commuting habitat or foraging habitats, since the boundary trees are retained and protected, and the strip of mown amenity grass that will be lost, offers negligible value to foraging bats.

**Birds** – There is no potential for the scheme to affect any rare or specially protected bird species (since none were found on site). However, some potential nesting habitat for small common birds, would be lost during demolition of sheds / structures 'A' and 'B' (for instance in ivy and bramble), and so careless timing of demolition could risk unlawful nest disturbance or destruction (if works started during the March to August nesting season). However, nest compensation and avoidance of unlawful activity is ensured through the mitigation strategy at Section 5 below.

**Reptiles and Amphibians** – There is no potential for reptiles or newts to be adversely affected by this scheme, since the land of the site is all concrete hard-standing plus one narrow strip of short-mown amenity grass, neither of which supports any potential shelter or cover features that could attract reptiles or newts. The area of amenity grass lost to the scheme in the east is 5m by 40m (200m<sup>2</sup>), and that habitat is located 200m away from the nearest ponds (that were recently dug). The Natural England published newt impact risk template (below), confirms no requirement for a newt derogation licence in this instance (as the habitat impacted is so small and with no chance of individual newts being active within the site), although some precautionary recommendations are still made at Section 5 below.

Component	Likely effect (select one for each component; select the most harmful option if more than one is likely; lists are in order of harm, top to bottom)	Notional offence probability score
Great crested newt breeding pond(s)	No effect	0
Land within 100m of any breeding pond(s)	No effect	0
Land 100-250m from any breeding pond(s)	0.01 - 0.1 ha lost or damaged	0.01
Land >250m from any breeding pond(s)	No effect	0
Individual great crested newts	No effect	0
	Maximum:	0.01
Rapid risk assessment result:	<b>GREEN: OFFENCE HIGHLY UNLIKELY</b>	

*Great crested newt impact risk*





## 5.0 MITIGATION AND ENHANCEMENT

See the second plan at the rear of this report for locations of recommended measures.

**Bats** – There is no requirement for any bat roost mitigation design with this scheme, but Natural England's published 'unexpected discoveries' advice must be followed, in the unlikely event of something changing and a bat roost is discovered during the demolition works. In that instance, site works must stop while the Project Ecologist resurveys and advises on correct protocols, in consultation with Natural England.

**Birds** – Avoidance of nesting bird disturbance will be ensured through either timing the start of clearance works to occur outside the March to August nesting season; or only proceeding during the nesting season if the Project Ecologist has first conducted an updated bird survey and confirmed there are no active nests within the working area, on the day of works starting.

**Reptiles + Newts** – As a precaution, the existing strip of short-mown amenity grassland on the eastern boundary (that will be lost to the scheme), should be kept regularly mown short, as is currently undertaken (within the March to October growing season), continuously up to the point at which site clearance occurs. This is so that it is not ever left unmanaged for any periods, that might allow it to otherwise develop into a reptile or newt habitat or features (eg – grass tussocks) that might attract reptiles or newts in future.

**Trees** – The retained boundary woodland / trees will be protected from accidental harm through the usual approach of temporary Heras fencing outside the canopy spreads, through the contract period.

**Enhancement** - Through the National Planning Policy Framework (NPPF), the Government has advised that LPA's should seek some ecological enhancement (net biodiversity gain) within all planning applications. At this site there is negligible habitat loss (loss of only a tiny area of amenity grass (200m<sup>2</sup>)), and so enhancement can readily be achieved through the following measures, located partly within the red-line boundary and partly within the 'blue-line' boundary (same ownership):

A range of six Vivara 'woodstone / concrete' bird nest boxes, using different styles and sizes (x2 open-fronted, x2 closed boxes with 32mm entrance hole, and x2 closed boxes with 28mm entrance hole), fixed onto the retained east boundary trees, at 2.5 - 3m height (facing west).

A range of four Vivara 'woodstone / concrete' bat roosting boxes, using different styles and sizes (eg – x2 Beaumaris boxes, and x2 Vivara Pro bat boxes), fixed onto the retained east boundary trees, at 5 - 6m height (facing west).

Two fruit trees will be planted into small grassland areas in the west, with native species-rich grassland seed (Emorsgate EM1 general purpose meadow mix) sown into the grassland patch beneath the fruit trees, and allowed to flower and seed each summer (mown only in April and September). Replace any trees that die within the first 5 years.

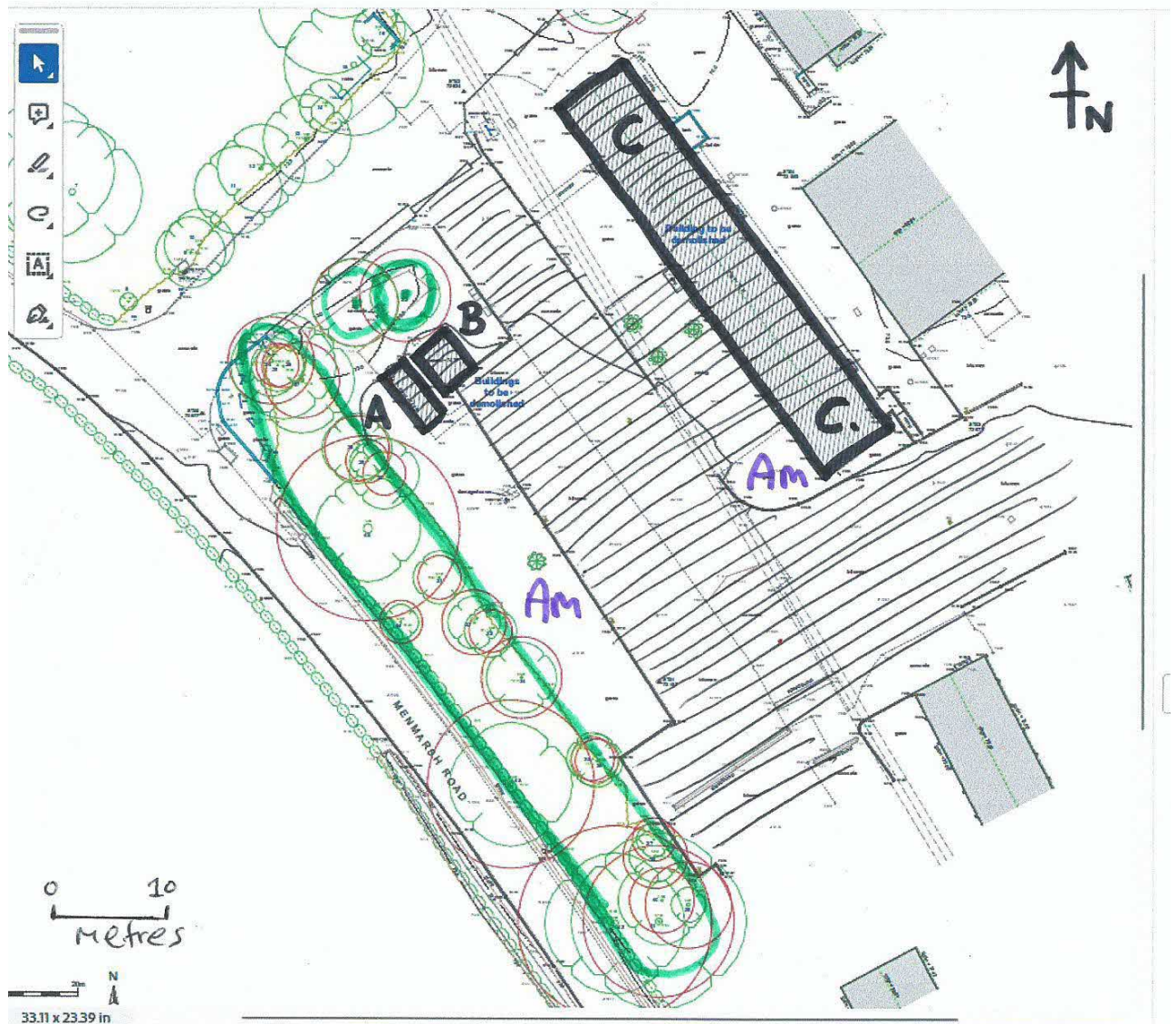
Plant a 20m length of native species-rich hedging, in the west beside the two proposed fruit trees, using a double staggered row of 'whips' at 30cm centres (beech, field maple, hazel, wild privet, dogwood).






Allow another 5m by 40m strip of south-eastern boundary grassland (located immediately to the south of the proposed construction site), to flower and set seed each summer (eg – swap the current weekly short mowing regime, for a twice per year mow in April and September). This encourages a wealth of insect life, and foraging opportunities for birds and bats.

In conclusion, this approach ensures the scheme does not contravene wildlife laws or ecology policy, and so there are no ecology 'reasons for refusal'.



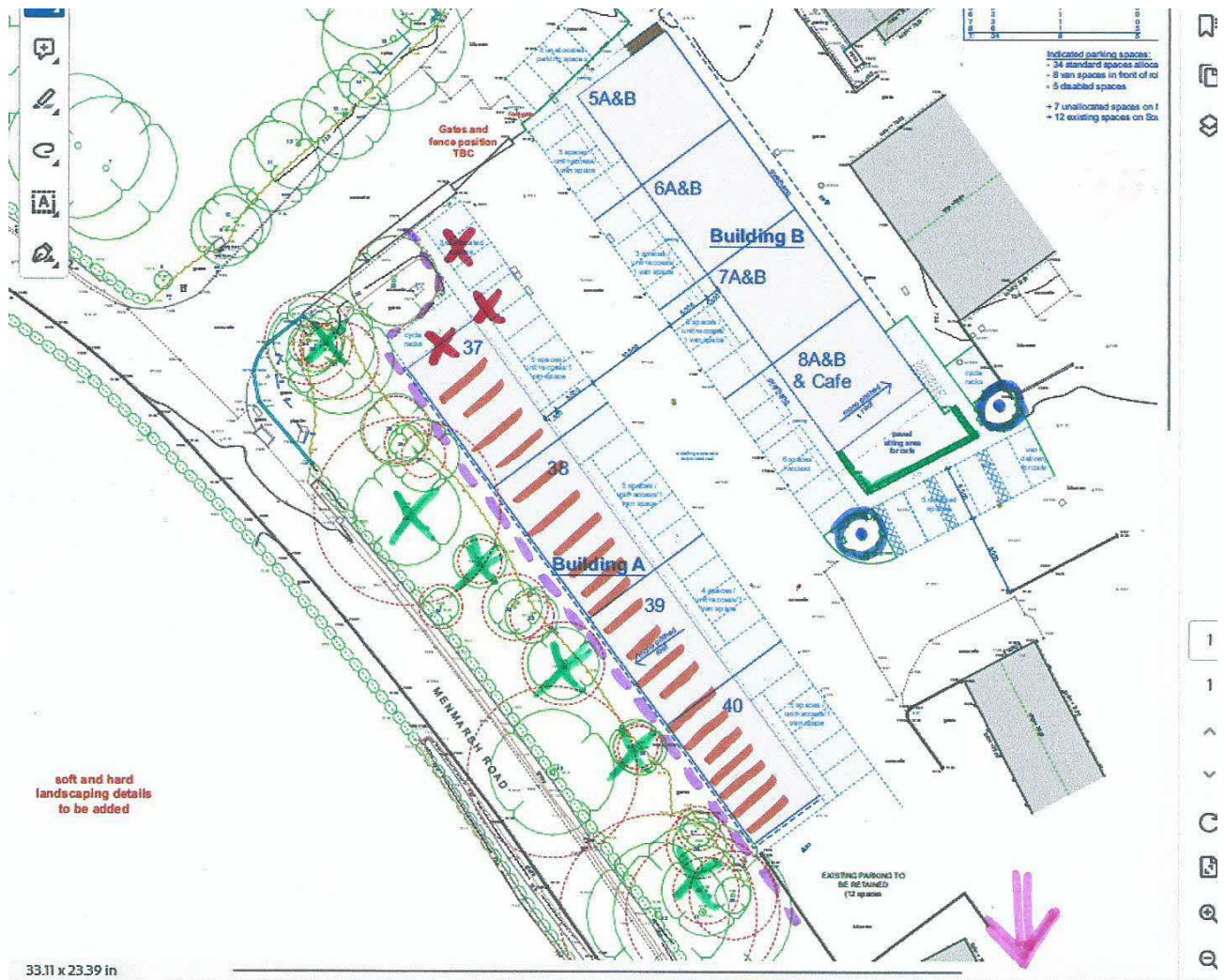
# PLANS



-  - Buildings + hardstanding
-  - Building footprints
-  - short-mown amenity grass
-  - Mixed ornamental woodland
-  - silver birch tree

- unit 7, Wornal Park
- Habitats
- JS821 (15/1/24)





- X - Demolition of sheds and removal of birch tree must avoid March-Aug nesting season unless survey confirms, no active bird nests at the time
- |||| - Keep grassland very short (weekly mown to 5cm), right up to site clearance date, to keep it unsuitable for reptiles and newts
- - - - Temporary Heras fence protects trees
- X - Six bird boxes at 2.5-3m height and four bat boxes at 5-6m height erected onto retained trees
- ⊙ - Fruit trees planted + EM1 seed beneath
- - New native species-rich hedge
- ➔ - 200m<sup>2</sup> of amenity grass on SW boundary left unmown in summer to allow flowering

- Unit 7, Wornal Park
- Mitigation + Enhancement
- JJ821 (17/1/24)