



## ***22 Frome Road, Beckington***

**Preliminary Ecological Appraisal Report**

**Prepared for: Mr Damian Kelly**

**Date: November 2022**



This report has been prepared and provided in accordance with the Code of Professional Conduct of the Chartered Institute of Ecology and Environmental Management.

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Nash Ecology Ltd has prepared this Report for the sole use of Damian Kelly (“Client”) in accordance with the Agreement under which our services were performed.

The conclusions and recommendations contained in this Report are based upon information provided by others and upon the assumption that all relevant information has been provided by those parties from whom it has been requested and that such information is accurate.

The methodology adopted and the sources of information used by Nash Ecology Ltd in providing its services are outlined in this Report. The work described in this Report was undertaken in July 2022 and is based on the conditions encountered and the information available during the said period of time.

Nash Ecology Ltd disclaim any undertaking or obligation to advise any person of any change in any matter affecting the Report, which may come or be brought to Nash Ecology Ltd attention after the date of the Report.

This report is considered ‘valid’ for up to two years from the date the walkover survey was conducted. If an application is made after this, then it is advisable to undertake an updated survey. In addition, any significant change to the project should result in consultation with an ecologist as reassessment of the ecological constraints may be required.

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TABLE OF CONTENTS	<b>1</b>	<b>INTRODUCTION</b> .....	<b>3</b>
	<b>1.1</b>	<b>Background and Scope</b> .....	<b>3</b>
	<b>2</b>	<b>LEGISLATION AND PLANNING POLICY SUMMARY</b> .....	<b>5</b>
	<b>2.1</b>	<b>Wildlife Legislation</b> .....	<b>5</b>
	<b>2.1.1</b>	<b>Planning Policy Summary</b> .....	<b>5</b>
	<b>3</b>	<b>METHODS</b> .....	<b>6</b>
	<b>3.1</b>	<b>Desk-based Study</b> .....	<b>6</b>
	<b>3.2</b>	<b>Field Survey</b> .....	<b>6</b>
	<b>3.2.1</b>	<b>Phase 1 Habitat Survey</b> .....	<b>6</b>
	<b>3.2.2</b>	<b>Bat Inspection</b> .....	<b>6</b>
	<b>3.3</b>	<b>Survey Limitations</b> .....	<b>7</b>
	<b>4</b>	<b>RESULTS</b> .....	<b>8</b>
	<b>4.1</b>	<b>Desk-based Study</b> .....	<b>8</b>
	<b>4.1.1</b>	<b>Statutory Designations</b> .....	<b>8</b>
	<b>4.1.2</b>	<b>Non-statutory Designations</b> .....	<b>8</b>
	<b>4.2</b>	<b>Field Survey</b> .....	<b>8</b>
	<b>4.2.1</b>	<b>Site Setting</b> .....	<b>8</b>
	<b>4.2.2</b>	<b>Habitats</b> .....	<b>8</b>
	<b>4.2.3</b>	<b>Notable Habitats</b> .....	<b>12</b>
	<b>4.3</b>	<b>Protected and Notable Species</b> .....	<b>12</b>
	<b>5</b>	<b>IDENTIFICATION OF ECOLOGICAL CONSTRAINTS AND RECOMMENDATIONS</b> .....	<b>15</b>
	<b>5.1</b>	<b>Approach to the Identification of Ecological Constraints</b> .....	<b>15</b>
	<b>5.2</b>	<b>Species</b> .....	<b>16</b>
	<b>5.3</b>	<b>Opportunities for Ecological Enhancement</b> .....	<b>17</b>
	<b>6</b>	<b>REFERENCES</b> .....	<b>18</b>

1 INTRODUCTION

1.1 Background and Scope

Nash Ecology Ltd was instructed to carry out a Preliminary Ecological Appraisal (PEA) of a residential property, namely '22 Frome Road Beckington Frome BA11 6TD' (see Figure 1). The survey was commissioned to inform proposals to demolish the existing property and replace it with three new residential units (Figure 2). The Site had been the subject of a separate, and unsuccessful, application in 2019 (ref: 2019/2736/FUL). The applicant is mindful of the earlier reasons for refusal and has sought to address said reasons through the careful design of the current iteration.

The remainder of this report provides the methodologies used and the results of the survey, as well as recommendations for further survey or suitable ecological mitigation strategies, where they are deemed necessary (see Section 5).

Figure 1: Site Location

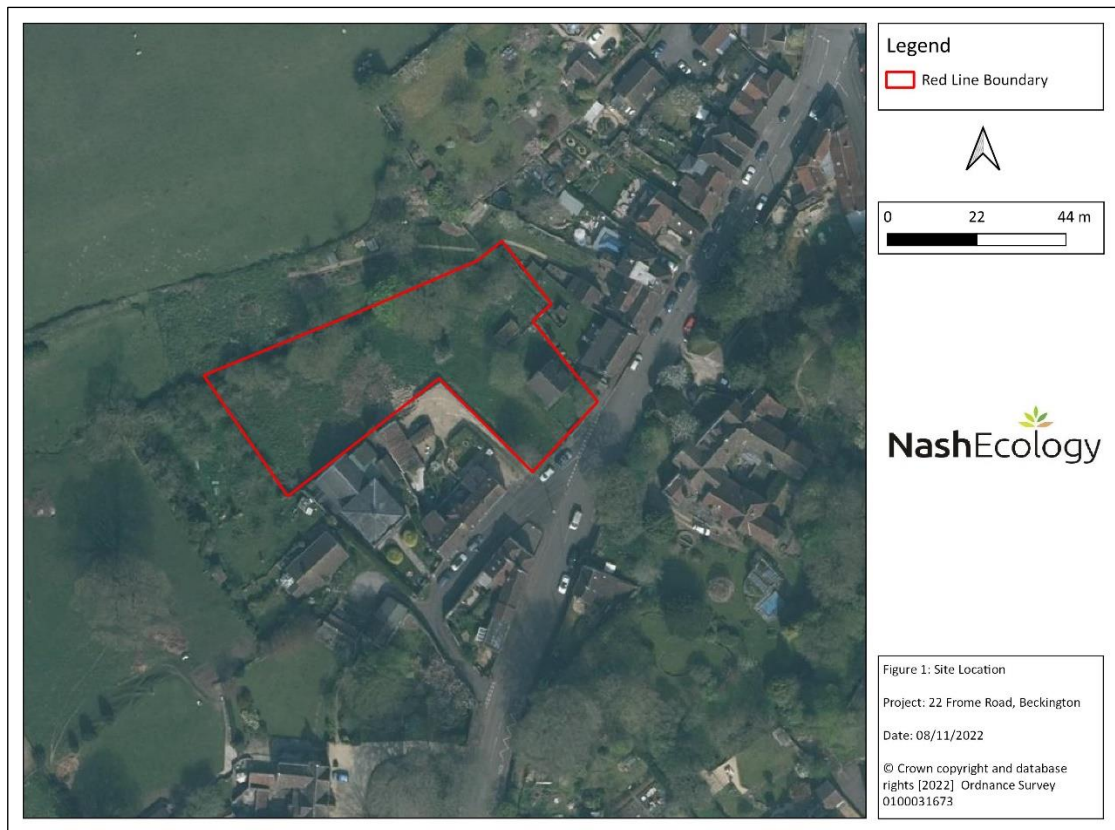
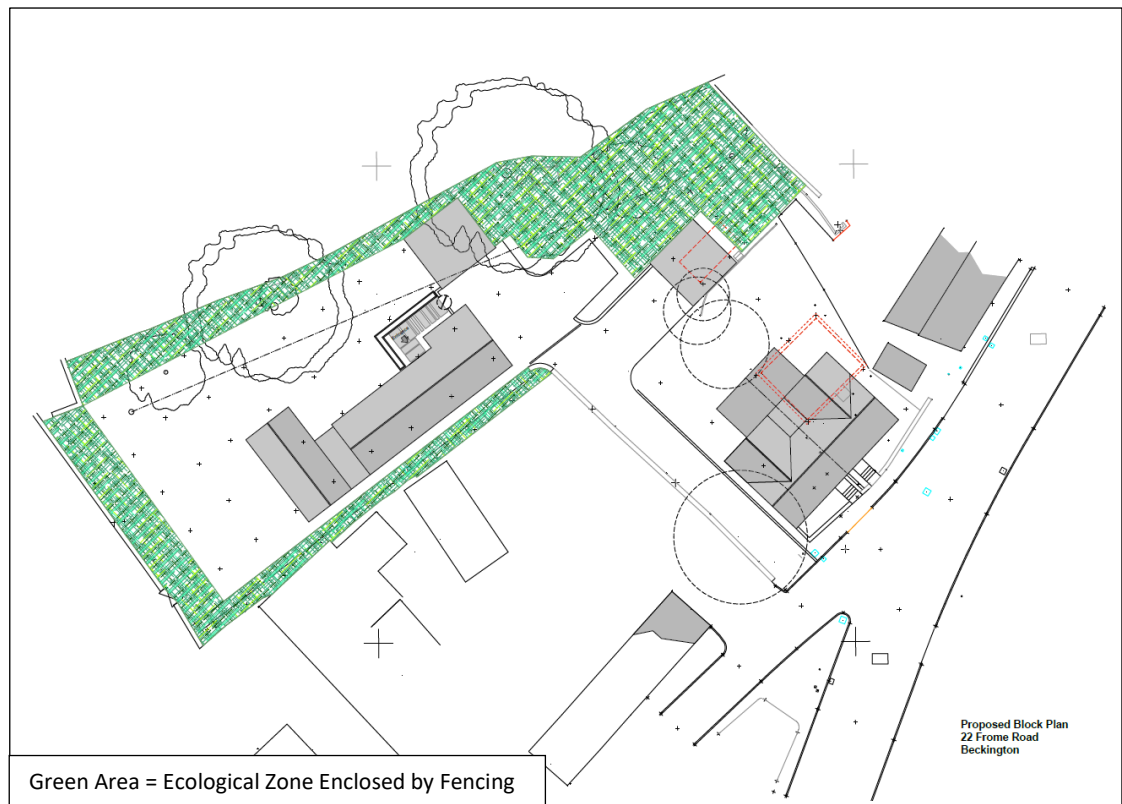


Figure 2: Proposed Development



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## 2 LEGISLATION AND PLANNING POLICY SUMMARY

### 2.1 Wildlife Legislation

The following wildlife legislation is potentially relevant to the proposed development and has been considered when planning and undertaking this survey:

- The Wildlife and Countryside Act (WCA) 1981 (as amended);
- The Countryside and Rights of Way (CROW) Act 2000;
- The Natural Environment and Rural Communities (NERC) Act 2006;
- The Conservation of Habitats & Species (Amendment) (EU Exit) Regulations 2019;
- The Protection of Badgers Act 1992; and
- The Hedgerow Regulations 1997.

#### 2.1.1 *Planning Policy Summary*

The National Planning Policy Framework (NPPF) 2021 was considered in the preparation of this report. The NPPF specifies the obligations that the Local Authorities and the UK Government have regarding statutory designated sites and protected species under UK and international legislation and how this is to be delivered in the planning system. Protected or notable habitats and species should be considered as a material consideration in planning decisions and may therefore make some sites unsuitable for particular types of development. If the development is permitted, mitigation measures may be required to avoid or minimise impacts on certain habitats and species, or where impact is unavoidable, compensation may be required.

### 3 METHODS

#### 3.1 Desk-based Study

A desk-based study was carried out to identify nature conservation designations and protected and notable habitats and species potentially relevant to the proposed development. In all cases, ST 799 517 was used as the search point.

The desk-based study was carried out using the data sources detailed in Table 1.

**Table 1: Desk-based Study Data Sources**

Data Source	Data Obtained
Multi-Agency Geographic Information for the Countryside (MAGIC) website	<ul style="list-style-type: none"> <li>International statutory designations within 2 km of the Study Area boundary</li> <li>Other statutory designations within 1 km of the Study Area boundary</li> <li>Information on habitats and habitat connections (based on aerial photography) relevant to interpretation of planning policy and assessment of potential protected and notable species constraints</li> </ul>
Somerset Environmental Records Centre	<ul style="list-style-type: none"> <li>Non-statutory designations within 1 km of the Study Area boundary</li> <li>Protected and notable species records within 2 km (records for the last 10 years only)</li> </ul>

#### 3.2 Field Survey

##### 3.2.1 Phase 1 Habitat Survey

A walkover survey of the Site was undertaken on 20<sup>th</sup> July 2022. Features of interest situated near to, but outside of, the Site were noted but not subject to full survey.

During the walkover survey, habitat types were recorded, classified and mapped according to the standard Phase 1 Habitat survey methodology (JNCC, 2010). Broad species lists were compiled for each habitat type; however, these lists were not meant to be exhaustive. Rather, botanical species listed were compiled to provide support for the classification and an indication of habitat quality.

This survey was ‘extended’ to include an assessment of the likelihood of protected / notable species occurring within the Site. This assessment was based on the project’s geographic location, the habitat types present, field survey and aerial imagery. A search for invasive weeds was included in the Phase 1 walkover.

##### 3.2.2 Bat Inspection

A Natural England-licensed (Class 2) bat ecologist undertook a full inspection (both external and internal) of 22 Frome Road and a garage on 20<sup>th</sup> July 2022. During the survey, the surveyor inspected the buildings for exterior roosting locations and possible access points to each buildings’ interior. Such features were accessed and inspected for signs of use using an endoscope. An internal inspection for suitable roost locations and evidence of bat occupancy (such as droppings, urine spots, an absence of cobwebs and bats themselves) was then undertaken.

Trees were inspected from ground-level using a torch and binoculars. Of particular note were Potential Roost Features (PRF) that could support bats.

As bats are a cryptic group and often move between roosts, both within and between years, their presence is not always easy to detect. The buildings and trees were assessed for their Bat Roost Potential (BRP), following published guidance (BCT, 2016). The BRP categories are provided in Table 2 below.

**Table 2: Bat Roost Potential Categories (BCT, 2016 and Mitchell-Jones, 2004)**

Roost Potential	Description
Known or Confirmed	Confirmed signs of bat presence/ occupation (droppings, oily staining around entry points, insect remains, odour, scratching) and actual bat presence.
High	A structure or tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.
Moderate	A structure or tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only – the assessments in this table are made irrespective of species conservation status, which is established after presence is confirmed).
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation).  A tree of sufficient size and age to contain PRFs but with none seen from the ground or features seen with only very limited roosting potential.
Negligible	No features suitable for roosting bats. Includes structures constructed from unsuitable materials e.g. prefabricated with steel and sheet material. Structure is draughty, light and cool buildings with no roosting opportunities. High levels of regular disturbance including external lighting. Building is isolated for areas of foraging habitat. In the case of trees, no potential roosting features are present, or features have no potential to support roosting bats.

### 3.3 Survey Limitations

The aim of a desk-based study is to help characterise the baseline context of a proposed development and provide valuable background information that would not be captured by a single site survey alone. Information obtained during a desk-based study is dependent upon people and organisations having made and submitted records for the area of interest. As such, a lack of records for a particular species does not necessarily mean that the species does not occur in the study area. Likewise, the presence of records for particular species does not automatically mean that these still occur within the area of interest or are relevant in the context of the project.



## 4 RESULTS

### 4.1 Desk-based Study

#### 4.1.1 Statutory Designations

No statutory sites were identified within the search areas.

#### 4.1.2 Non-statutory Designations

One non-statutory designated site was identified within 1 km:

- River Frome Fields Local Wildlife Site (LWS): a species-rich unimproved grassy bank with scattered scrub located c. 600 m to the west at its nearest point.

Based on the highly localised nature of the proposed works coupled with reasons for citation, the LWS was not located within the zone of influence.

The Site is located within Band C of the Mells Valley Bat Consultation Zone (BCZ), which was created to assess and control development within close proximity to Mells Valley Special Area of Conservation (SAC). The SAC includes greater horseshoe bats (*Rhinolophus ferrumequinum*) as a primary reason for designation; indeed, the Mells Valley SAC contains a maternity site associated with c. 12% of the UK's greater horseshoe bat population. A proportion of the population also hibernates at the site. Mells Valley SAC comprises multiple discrete sites, of which the nearest to the Site was located c. 5.3 km to the southwest. Accordingly, special attention was paid to identifying potential impacts on greater horseshoe bats.

### 4.2 Field Survey

#### 4.2.1 Site Setting

The Site was located on the western edge of the village of Beckington. Residential properties bordered the house to the north, east and south. A tributary of the River Frome was located at the Site's western boundary, albeit beyond a stone wall. Beyond the watercourse, the land was dominated by sheep-grazed pasture. The River Frome was located 0.4 km to the west (at its nearest point). The total area of land included within the Red Line Boundary (Figure 1) measured c. 0.283 ha

#### 4.2.2 Habitats

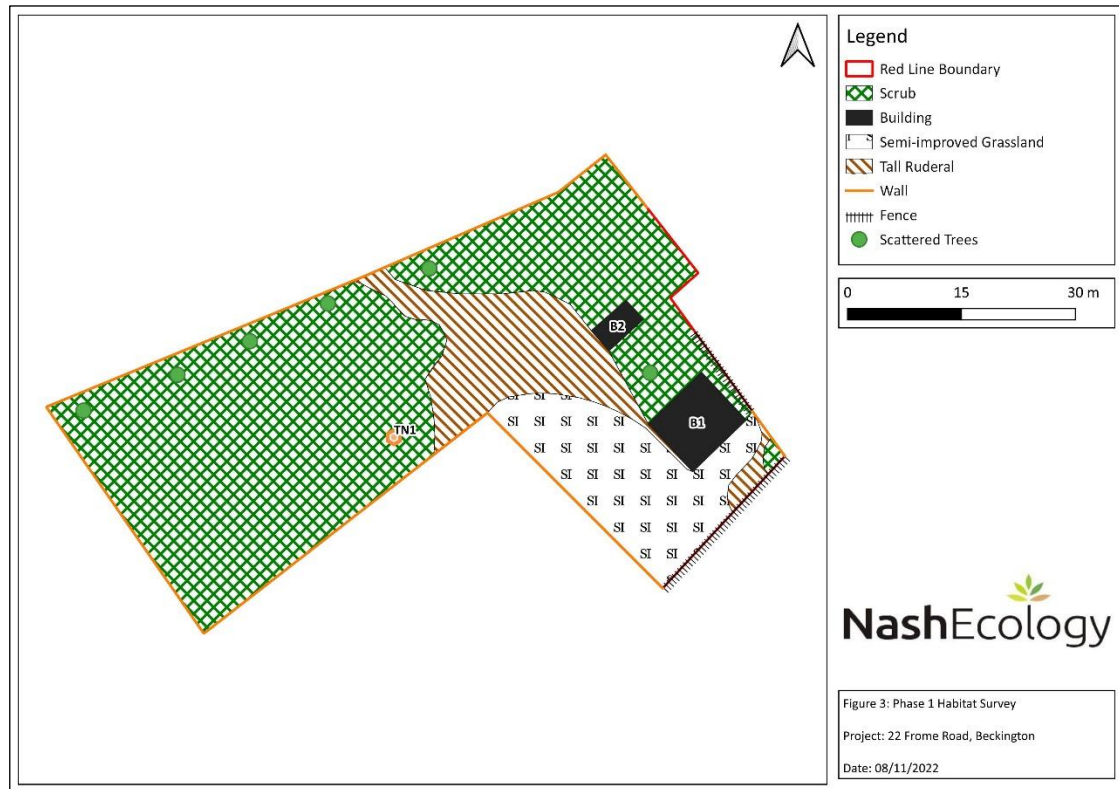
The habitats recorded and their distribution within the Site are shown in Table 3 and on Figure 3. Illustrative photographs are provided throughout the text where appropriate. The habitats are then described in greater detail below.

**Table 3: Habitats Present on Site in Descending Order of Spatial Occupancy**

Habitat	Brief description	Area (ha)	% of Site
Scrub	Much of the Site had been encroached upon by dense, continuous scrub.	0.191	67.5
Tall ruderal vegetation	Tall ruderal vegetation had developed alongside, and to a certain degree within, the grassland.	0.041	14.5
Neutral, semi-improved grassland	Unmanaged lawns had developed into semi-improved grassland.	0.04	14.1

Buildings	The Site included two buildings, namely the House and the Garage.	0.011	3.9
Scattered trees	Scattered trees were present on Site.	0.191	67.5

Figure 3: Phase 1 Habitat Plan



**Scrub**

Much of the Site was covered by dense, continuous bramble (*Rubus fruticosus* agg.) scrub (Plate 1). Scrub was also encroaching on the tall ruderal vegetation and semi-improved grassland. A line of tall scrub was present adjacent to the northern boundary and included hazel (*Corylus avellana*), hawthorn (*Crataegus monogyna*), elder (*Sambucus nigra*) and dogwood (*Cornus sanguinea*).

**Plate 1: Dense Scrub**



**Plate 2: Tall Ruderal Vegetation**



### **Tall Ruderal Vegetation**

Tall ruderal herb vegetation was located centrally within the Site, with a small area adjacent to the south-eastern corner (Plate 2). The habitat was dominated by stinging nettle (*Urtica dioica*) and hedge bindweed (*Calystegia sepium*) with frequent broadleaved dock (*Rumex obtusifolius*), creeping thistle (*Cirsium arvense*), ragwort (*Senecio jacobaea*), hogweed (*Heracleum sphondylium*), cocksfoot (*Dactylis glomerata*) and false oat-grass (*Arrhenatherum elatius*). Sycamore (*Acer pseudoplatanus*) saplings were developing to the north of the house.

A large pile of stones was present in the ecotone between the scrub and tall ruderal vegetation (TN1, Figure 3).

### **Neutral Semi-improved Grassland**

An area of neutral, semi-improved grassland was present in the south of the Site (Plates 3 & 4). The grassland was formed from two separate lawns in which management has ceased. The grass was tall ( $\leq 1\text{m}$ ) and species depauperate. Species recorded included cocksfoot, perennial rye-grass (*Lolium perenne*), Yorkshire fog (*Holcus lanatus*) and false oat-grass. Forbs were frequent and included daisy (*Bellis perennis*), dandelion (*Taraxacum officinale* agg.), stinging nettle, hogweed, ragwort, oxeye daisy (*Leucanthemum vulgare*) and herb-Robert (*Geranium robertianum*).

**Plate 3: Neutral Grassland (west of house)**



**Plate 4: Neutral Grassland (south of house)**



### **Buildings**

The Site included a residential house (B1, Figure 3) and a Garage (B2, Figure 3). The house was detached, two-storey and unoccupied at the time of survey (Plates 5 & 6). The walls were constructed from stone and were partially rendered. Intact double-glazed doors and windows were present throughout. Plastic soffit boxes were located at the wall tops and were flush with the adjacent walls. The roof was pitched and clad in double roman tiles. The roof was in a good condition.

**Plate 5: House (B1) Southern Aspect**



**Plate 6: House (B1) Northern Aspect**



Internally, the property contained a single loft space that measured c. 10 m x 6 m x 2.5 m (Plates 7 & 8). The roof was lined with bitumen felt that was torn in places. Dense cobwebs covered the roof and extended down to the boarded / fibreglass floor. The gable walls were constructed from block. A water tank was present in the loft.

**Plate 7: B1 Loft Space**



**Plate 8: B1 Loft Space**



The garage (B2) was detached and constructed from block; the exterior walls were partially rendered. Ivy (*Hedera helix*) bindweed and sycamore saplings had encroached on the building. The roof was sloping and clad corrugated concrete / asbestos and plastic sheets. Internally, the roof was unlined.

**Plate 9: Garage (B2)**



**Plate 10: Loft Space 3**



### **Scattered Trees**

Trees present included a multi-stemmed grey willow (*Salix cinerea*), to the south of the garage, and semi-mature sycamore and ash (*Fraxinus excelsior*) along the northern boundary. Sycamore saplings were developing between the house and garage.

#### **4.2.3 Notable Habitats**

No notable habitats were recorded.

### **4.3 Protected and Notable Species**

The following provides a summary of potentially relevant species identified through a combination of desk-based study and field survey. Requirements for further survey or mitigation strategies, where deemed necessary, are provided in Section 5 of this report.

#### **Plants**

Three historical records of notable plant species were received. One record of bluebell (*Hyacinthoides non-scripta*) was received. The species, which is protected against picking, is a woodland species and therefore unlikely to occur on Site. One record of cornflower (*Centaurea cyanus*); this S41 species occurs on arable land and is not expected on the Site. One record of eagles-claws (*Anaptychia ciliaris* subsp. *ciliaris*), a S41 species of lichen, was received.

No notable species were recorded during the site visit. The Site comprised a residential garden that was, until recently, well maintained. No further botanical surveys are recommended to inform the planning application.

#### **Invertebrates**

Historical records of five protected or notable butterflies were received. These comprised dingy skipper (*Erynnis tages*), grizzled skipper (*Pyrgus malvae*), marsh fritillary (*Euphydryas aurinia*), small heath (*Coenonympha pamphilus*) and wall (*Lasiommata megera*). With the exception of the marsh fritillary, suitable habitat for these species was present on Site but also abundant locally.

Given the depauperate nature of the Site, it was unlikely to support important assemblages of invertebrates. No further invertebrate surveys are recommended to inform the planning application.

#### **Amphibians**

No historical records of amphibians were received from SERC.

No ponds were present within the Site; however, using OS Mapping two waterbodies were identified within 500 m. Of these, the first waterbody was located c. 420 m to the west; the second waterbody was located c. 35 m to the south, beyond several roads and rows of houses.

The Great Crested Newt Mitigation Guidelines (English Nature, 2001) states that great crested newts (*Triturus cristatus*, GCN) are capable of mitigating up to 500 m from their ponds; however, in reality such migrations are dangerous, energetically expensive and are only likely to be used where there is a paucity of suitable habitat locally. Indeed, a later publication by English Nature (2004) suggested that most individuals remain within 100 m of their pond and very few (if any) migrate beyond 200 m. This, coupled with the nature of the intervening habitat, mean that no GCN are expected to occur on Site. No terrestrial habitat within 250 m of either pond would be affected; c. 0.283 ha of land does,

however, lie within the 250 – 500 m bracket. Adding this information into Natural England’s rapid risk assessment (embedded within the EPSML Method Statement) indicates that an offence is highly unlikely (see Figure 4).

**Figure 4: Natural England’s Rapid Risk Assessment**

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
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)	No effect	0
Land >250m from any breeding pond(s)	0.1 - 0.5 ha lost or damaged	0.005
Individual great crested newts	No effect	0
	Maximum:	0.005
Rapid risk assessment result:	<b>GREEN: OFFENCE HIGHLY UNLIKELY</b>	

As such, amphibians are not assessed to be a constraint on the proposed development and no further surveys are required.

### Reptiles

Historical records of grass snake (*Natrix helvetica*) and slow-worm (*Anguis fragilis*) were received from SERC. A reptile survey was undertaken at the Site in 2019. The survey identified a population of slow-worm on the Site (peak adult count: 13).

Since the initial survey, the prevalence of the dense scrub has increased, thereby reducing suitability for reptiles (due to dense shade). In contrast, the grassland has since developed a taller sward and litter layer, which would greatly benefit the largely subfossorial slow-worms. Given the age of the data, an updated survey for reptiles is recommended.

### Birds

A large number of historical records of birds were received. Many of these records were of waterfowl and, thus, are unlikely to occur on Site.

The buildings did not contain historical evidence of nesting birds. The trees and scrub could support a range of nesting birds; the grassland was also capable of supporting ground nesting species. Suitable habitats are abundant locally and the development of the Site is unlikely to affect nesting birds. A precautionary approach to vegetation clearance is recommended and, as such, no further bird surveys are considered to be necessary.

### Hedgehog

Historical records of hedgehog (*Erinaceus europaeus*) were identified within 1 km.

Suitable habitat for the species was present on Site (scrub and grassland). A precautionary approach to the works has been recommended; as such, no targeted surveys are recommended.

### Badgers

Historical records of badger (*Meles meles*) were received from SERC.

No signs of badgers were identified during the survey; however, the dense scrub made a full search impossible. The Site was bounded on three sides by tall walls, which are likely to buffer ingress by the species. Despite this, a precautionary approach to the works has been recommended.

### **Bats**

Historical records of bats were received from SERC. Species included within the data included brown long-eared bat (*Plecotus auritus*), common pipistrelle (*Pipistrellus pipistrellus*), Daubenton's bat (*Myotis daubentonii*), greater horseshoe bat (*Rhinolophus ferrumequinum*), lesser horseshoe bat (*Rhinolophus hipposideros*), noctule (*Nyctalus noctula*), serotine (*Eptesicus serotinus*), natterers bat (*Myotis nattereri*), and soprano pipistrelle (*P. pygmaeus*).

A historical survey of B1 (First Ecology, 2019) identified a day / night roost of soprano pipistrelle. The location of the roost was not confirmed but thought to be beneath a roof tile. The current survey did not find any evidence of bats within the property. However, given that bats historical were recorded, an updated survey is recommended. Until further surveys are completed, the house was assessed as having High BRP.

The garage did not contain any external roost locations. The single-skinned block walls did not include any cavities. Overall, the garage was assessed as having Negligible BRP.

All of the trees within the grassland were assessed as having Negligible BRP given the absence of potential roost features.

The northern boundary, beyond which lies the River Brue, could represent an important flight line – particularly given the Site's location within the BCZ. Further surveys are required to ascertain whether bats are using the boundary.

## 5 IDENTIFICATION OF ECOLOGICAL CONSTRAINTS AND RECOMMENDATIONS

### 5.1 Approach to the Identification of Ecological Constraints

Relevant ecological receptors that may represent constraints to the proposed development, or that provide opportunities to deliver ecological enhancement in accordance with planning policy, are identified in Section 4 of this report.

The NPPF and local planning policy (summarised in Section 2 of this report) specify requirements for the protection of features of importance for biodiversity. Planning policy is a material consideration when determining planning applications.

Compliance with planning policy requires that the proposed development considers and engages the following mitigation hierarchy where there is potential for impacts on relevant ecological receptors:

1. Avoid features where possible;
2. Minimise impact by design, method of working or other measures (mitigation) e.g. by enhancing existing features; and
3. Compensate for significant residual impacts, e.g. by providing suitable habitats elsewhere (whether in the control of the client or otherwise legally enforceable through planning condition or Section 106 agreement).

This hierarchy requires the highest level to be applied where possible. Only where this cannot reasonably be adopted should lower levels be considered. The rationale for the proposed mitigation and/or compensation should be provided with planning applications, including sufficient detail to show that these measures are feasible and would be provided.

In pursuance of the objective within the NPPF of providing net gains in biodiversity where possible, consideration should be given to the scope for enhancement as part of the proposed development. This should represent biodiversity gain over and above that achieved through mitigation and compensation. Enhancement could be achieved on and/or off the Site.

The likelihood of the relevant ecological receptors constraining the proposed development has been assessed with reference to the scale described in Table 4. The higher the importance of the ecological receptor for the conservation of biodiversity at national and local scales, the more likely it is to be a material consideration during determination of the planning application for the proposed development.

**Table 4: Scale of Constraint to Development**

Likelihood	Definition
High	An actual or potential constraint that is subject to relevant legal protection and is likely to be a material consideration in determining the planning application (e.g. statutory nature conservation designations and European/nationally protected species). Further survey likely to be required (as detailed in this report) to support a planning application.
Medium	An actual or potential constraint that is covered by national or local planning policy and, depending on the level of the potential impact as a result of the proposed development, may be a material consideration in determining the planning application. Further survey may be required (as detailed in this report) to support a planning application.



Low	Unlikely to be a constraint to development or require further survey prior to submission of a planning application. Mitigation is likely to be covered under Construction Environmental Management Plan (CEMP) or precautionary working method statement (e.g. generic requirements for the management of nesting bird risks).
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## 5.2 Species

The following provides mitigation strategies for species identified as a potential constraint in Section 4.

### **Reptiles**

An updated survey is required to inform a mitigation strategy.

### **Birds**

All wild birds are protected whilst nesting or rearing young under the Wildlife and Countryside Act 1981 (as amended). It is recommended that vegetation clearance and the building demolition should be undertaken outside of the peak nesting season (i.e. cut between September and February). If this is not practicable, then the affected sections should be checked for active nests by a suitably trained ecologist to ensure they are not present immediately prior to clearance.

### **Hedgehog**

There is no evidence that hedgehogs are currently using the Site but they could be present in the local area. Care should be taken during construction and, as a precaution, any excavations or trenches left open overnight should be fitted with a means of escape i.e. planks of wood.

### **Badger**

There is no evidence that badgers are currently using the Site but they could be present in the local area. Care should be taken during construction and, as a precaution, any excavations or trenches left open overnight should be fitted with a means of escape i.e. planks of wood.

### **Bats**

An updated survey of the house is required to ascertain whether it contains a bat roost.

An updated activity survey of the Site is required to ascertain whether it supports any important flight lines.

Whilst the proposed development will not directly affect the river corridor, indirect effects such as lighting might occur. To address this, a sensitive lighting strategy will be implemented. The sensitive lighting strategy will comprise the following broad elements (BCT, 2018):

- No excessive lighting - use only the minimum amount required for safety;
- No night-time working to be undertaken;
- Minimise light spill – use short columns and direct light downwards and in towards the Site;
- Use narrow spectrum bulbs that emit minimal ultra-violet light - avoid white and blue wavelengths of the spectrum, which can attract invertebrates;
- Lights should either peak higher than 550 nm or use glass lantern covers to filter UV light;

- Avoid using reflective surfaces under lights; and
- Minimise the amount of light spill from within the new buildings by good design.

**Table 5: Summary Appraisal of Ecological Constraints and Recommended Further Action**

Receptor	Scale of Constraint	Further Requirements, Including Potential Mitigation Requirements	Driver	When is Action Likely to be Required	
				To Inform Design	Pre-construction Onwards
Reptiles	High	Updated survey required.	Legislation	✓	
Birds	High	Vegetation clearance to be undertaken outside of the nesting season or fingertip search by an ecologist.	Legislation		✓
Badger	High	Excavations or trenches left open overnight should be fitted with a means of escape i.e. planks of wood.	Legislation		✓
Hedgehog	Medium	Excavations or trenches left open overnight should be fitted with a means of escape i.e. planks of wood.	Planning		✓
Bats	High	Further emergence and activity surveys required. Sensitive lighting strategy to be implemented.	Legislation	✓	

The constraints outlined here will need to be reassessed if there is a significant change to the type or scale of development proposed or if there are any significant changes in the use or management of the land that would affect the habitats and species. If a planning application is made two years or more after a PEA it is advisable to review and update the survey data.

### 5.3 Opportunities for Ecological Enhancement

Opportunities for enhancement would be determined following the reptile and bat surveys.

## 6 REFERENCES

BCT (2016) Bat Surveys: Good Practice Guidelines 3<sup>rd</sup> Edition. BCT, London

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