



The White Hart, South Mimms

## Preliminary Ecological Appraisal

Prepared by  
CSA Environmental

on behalf of  
Griggs (South Mimms) Limited

Report Ref: CSA/6115/01

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This report may contain sensitive ecological information. It is the responsibility of the Local Authority to determine if this should be made publicly available.

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## EXECUTIVE SUMMARY

Residential development is proposed at The White Hart, St Albans Road, South Mimms, Hertfordshire for which planning permission will be sought.

CSA Environmental was instructed by Griggs (South Mimms) Ltd to undertake a Preliminary Ecological Appraisal (PEA) of the Site to identify any ecological constraints to development, inform scheme design, highlight opportunities for ecological enhancement and determine the need for any additional investigation/survey. As part of this PEA, a desk study and field survey of the Site were undertaken in May 2023, including a UK Habitat Classification survey.

No direct or indirect adverse effects are anticipated on statutory or non-statutory sites given the small scale of the development and separation from these designations.

Habitats currently present within the Site are generally common and widespread, with the greatest ecological interest associated with the other neutral grassland and mixed scrub in the south-east of the Site. Hedgerows and trees will be retained where practicable and will be buffered from development edge effects. Habitats suitable for nesting birds and reptiles were identified within the Site, with precautionary mitigation measures detailed below.

The buildings on Site were assessed to have 'Moderate' suitability for roosting bats based on the potential roosting features identified and potential ingress/egress points. Further emergence/re-entry bat surveys have been recommended to determine the presence of roosting bats.

Recommendations for ecological enhancement measures that the proposed development could deliver have been outlined herein, in line with local and national policy (i.e. NPPF, 2023).

## 1.0 INTRODUCTION

- 1.1 This report has been prepared by CSA Environmental on behalf of Griggs (South Mimms) Ltd. It sets out the findings of a Preliminary Ecological Appraisal (PEA) of The White Hart, South Mimms (hereafter referred to as 'the Site'). The White Hart is a public house which closed in 2021. Residential development is proposed at the Site, for which detailed planning permission will be sought.
- 1.2 The scope of this appraisal has been determined with due consideration for best-practice guidance provided by the Chartered Institute of Ecology and Environmental Management (CIEEM, 2017), and to the *Biodiversity: Code of practice for planning and development* (BS 42020:2013) published by the British Standards Institution (2013).
- 1.3 The Site occupies an area of c. 0.27ha and is located around central grid reference TL 22191 01260, to the north of South Mimms. The Site the former White Hart Pub with associated car park and gardens; with mixed scrub and grassland (see Habitats Plan in Appendix A).
- 1.4 This PEA aims to:
- Characterise baseline ecological conditions of the Site and its wider context
  - Identify any ecological constraints to development of the Site
  - Inform scheme design
  - Identify further ecological surveys and investigation necessary to inform a full Ecological Impact Assessment (EclA) of the Site
  - Highlight opportunities for ecological enhancement
- 1.5 To achieve these aims, an ecological desk study and field survey were undertaken of the Site, the findings of which are presented herein.
- 1.6 As set out in best practice guidelines (CIEEM, 2017) a PEA is typically only suitable for planning submission where there are no ecological constraints relating to the project. Where ecological constraints are identified, such as the presence of important ecological features, the effects of development on these features should be assessed within a separate EclA report, which would supersede the PEA.

## 2.0 LEGISLATION, PLANNING POLICY & STANDING ADVICE

### Legislation

2.1 Legislation relating to wildlife and biodiversity of particular relevance to this PEA includes:

- The Conservation of Habitats and Species Regulations 2017 (as amended)
- The Wildlife and Countryside Act 1981 (as amended)
- The Natural Environment and Rural Communities (NERC) Act 2006
- The Protection of Badgers Act 1992
- The Environment Act 2021

2.2 This above legislation has been addressed, as appropriate, in the production of this report. Further information on the above legislation is provided in Appendix B.

### National Planning Policy

2.3 The National Planning Policy Framework (NPPF) (Department for Levelling Up, Housing and Communities, 2023) sets out the government planning policies for England and how they should be applied. Chapter 15: Conserving and Enhancing the Natural Environment, is of particular relevance to this report as it relates to ecology and biodiversity. Further details are provided in Appendix B.

2.4 The Government Circular 06/2005, which is referred to by the NPPF, provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their effects within the planning system.

### Local Planning Policy

2.5 A number of local planning policies relate to ecology, biodiversity and/or nature conservation. These are summarised in Table 1 of Appendix B. These policies have been addressed, as appropriate, in the production of this report.

### Standing Advice

2.6 Natural England and Defra's Standing Advice (Natural England & Defra, 2014) regarding habitats and protected species aims to support local authorities and forms a material consideration in determining applications in the same way as any individual response received from Natural England following consultation. Standing advice has therefore been given due consideration, alongside other detailed guidance documents, in the production of this report.

## 3.0 METHODS

### Desk Study

- 3.1 An ecological desk study was undertaken in May 2023 comprising a review of online resources and biological records centre data as detailed below.
- 3.2 The Multi-Agency Geographic Information for the Countryside (MAGIC) online database was reviewed to identify nature conservation designations within the following search radii:
  - Special Protection Areas (SPA), Special Areas of Conservation (SAC) and Ramsar sites within 10km of the Site (including possible/proposed sites)
  - Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR), Local Nature Reserves (LNR) within 3km of the Site
  - Other relevant data e.g. Ancient Woodland Inventory within 1km of the Site
- 3.3 A review was undertaken of the location of any such designations, their distance from and connectivity with the Site, and the reasons for their designation. This information was used to determine whether they may be within the **proposed development's** Zone of Influence (Zoi).
- 3.4 Herts Environmental Records Centre (HERC) was contacted for details of any non-statutory nature conservation designations and records of protected/notable habitats and species. This information was requested for an area encompassing the Site and adjacent land within c. 2km of its central grid reference. This search area was selected to include the likely zone of influence upon non-statutory designations and protected or notable habitats and species.
- 3.5 Further online resources were reviewed for information which may aid the identification of important ecological features. The **Woodland Trust's** online Ancient Tree Inventory was reviewed for known ancient or veteran trees within the Site and adjacent land. Interactive online mapping provided by the charity 'Buglife' was used to determine whether the Site falls within an Important Invertebrate Area.
- 3.6 In accordance with Natural England's Great Crested Newt Mitigation Guidelines (2001), a desktop search was undertaken to identify ponds within 500m of the Site which may have potential to support breeding great crested newts *Triturus cristatus*, using Ordnance Survey (OS) mapping, the MAGIC database and aerial photography.
- 3.7 Where possible under the terms of the data provider, relevant desk study data are presented in Appendix C.

## Field Survey

- 3.8 A UK Habitat Classification ('UKHab') survey was carried out in fine and dry weather conditions on 4 May 2023 by Alexandra Cole MCIEEM, FISC<sup>1</sup> Level 4 and Rosie Billington, encompassing the Site and immediately adjacent habitats that could be viewed.
- 3.9 UKHab is a unified and comprehensive system for mapping and classifying habitats, designed to provide a simple and robust approach to surveying and monitoring, and replaces Phase 1 Habitat survey methods. The method allows for identification of important habitat types, including habitats of Principal Importance under Section 41 (S41) of the NERC Act (2006) and Habitats Directive Annex I habitats.
- 3.10 The following parameters were adopted for the UKHab survey undertaken for this PEA:
- UKHab Professional edition (Butcher *et al.*, 2020, commercial End User Licence Agreement (EULA))
  - Minimum Mappable Unit (MMU):
    - 10m<sup>2</sup>/0.001ha (polygons)
    - 5m (linear)
  - Primary Habitats recorded to a minimum of Level 2 (see below) with UKHab codes provided
  - Mandatory secondary codes used
  - Base-mapping comprising a combination of aerial imagery and topographic information
- 3.11 Primary Habitats are recorded to a minimum of Level 2. Where the survey is conducted at an appropriate time of year (e.g. May to July for grassland) habitats may be recorded to Level 3, 4 or 5, only if conditions and the experience of the surveyor allow.
- 3.12 Alongside the UKHab survey, additional field survey information was collected, comprising:
- Detailed floral species lists recorded for each identified habitat/parcel
  - Evidence of, or potential for, European Protected Species (EPS) (including bats, great crested newt, dormouse and otter)
  - Evidence of, or potential for, other protected species (including birds, reptiles, water vole, badger and certain invertebrates)
  - Evidence of, or potential for, other notable species (including S41 Species of Principal Importance as well as notable, rare, protected or controlled plants and invertebrates)
  - Any other survey information relevant to ecological matters

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<sup>1</sup> Field Identification Skills Certificate, Botanical Society of Britain and Ireland



- 3.13 Results of the UKHab survey are presented on the Habitats Plan in Appendix A. Appendix D provides photographs of the habitats at the Site and Appendix E provides a list of floral species recorded in each habitat parcel. Nomenclature for higher plants within this report is consistent with the fourth edition of *The New Flora of the British Isles* (Stace, 2019).

#### Preliminary Roost Assessment (Trees and Structures)

- 3.14 All accessible buildings on-site were inspected and assessed for their potential to support roosting bats, with due consideration for the *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (Collins, 2016). Full survey methods and results are provided in Appendix F.
- 3.15 A detailed tree inspection was not undertaken as it is understood that the on-site tree (the weeping willow *Salix babylonica* located within the car park to the south of building B2b) will be protected from development.

#### Limitations

- 3.16 There were no specific limitations to the desk study.
- 3.17 The survey was conducted at an optimum time of year and in good conditions. Internal access within the roof voids of building B1 was limited due to H&S restrictions and limited accessibility. However, the majority of the voids could be viewed from the limited access points and high powered torches were used to assist in viewing the voids and potential roosting features, thus reducing the limitation.

#### Evaluation and Assessment

- 3.18 The evaluation and assessment of ecological features is beyond the scope of a PEA and has therefore not been undertaken here. Formal evaluation and assessment of any identified important ecological features should be undertaken as part of either a full EclA, or receptor-specific survey and assessment in accordance with the published CIEEM method (CIEEM, 2018).

## 4.0 BASELINE ECOLOGICAL CONDITIONS

### Nature Conservation Designations

#### Statutory

- 4.1 There are no statutory designations covering any part of the Site.
- 4.2 A single international statutory designation, Wormley-Hoddesdon Park Woods Special Area of Conservation (SAC) was identified c. 9.2km north-east of the Site.
- 4.3 A total of three national statutory designations were identified within 3km of the Site. These were the Redwell Wood Site of Special Scientific Interest (SSSI) (c. 0.8km north of the Site), Castle Lime Works Quarry SSSI (c. 1.4km north-east of the Site) and Water End Swallow Holes SSSI (c. 2.7km north-east of the Site).
- 4.4 A single local statutory designation was identified within 3km of the Site. This is Furzeffield Wood and Lower Halfpenny Bottom Local Nature Reserve (LNR) (c. 1.9km north-east of the Site).
- 4.5 These statutory designations are described in Table 1 below.

#### Non-Statutory

- 4.6 A total of six non-statutory Local Wildlife Site (LWS) designations were identified within 1km of the Site. These were Meadow by St Albans Road LWS, Grassland west of Greyhound Lane LWS, Mimmshall Brook Pasture LWS, Hawkshead Wood and Mymmshall Wood LWS, Mimmshall Brook by Mimms Hall LWS and Meadows by Windmore Hall LWS. These non-statutory designations are described in Table 1 below.

Table 1. Statutory and Non-Statutory Designations within search radii

Site Name & Designation	Distance & Direction from Survey Area	Special Interests or Qualifying Features
International Designations within 10km		
Wormley-Hoddesdon Park Woods SAC	c. 9.2km north-east	A series of woods lying mainly on London clay, with some gravel deposits and areas of chalky boulder clay. The woodland covers an area of 335.53ha and is located within the Northern Thames Basin National Character Area. The woodland is mainly broad-leaved deciduous consisting of hornbeam and sessile oak with an understory of bluebells and great woodrush.
National Designations within 3km		
Redwell Wood SSSI	c. 0.8km north	Redwell wood covers 52.8ha and is a structurally varied woodland. It comprises both ancient woodland of pedunculate oak and hornbeam as well

		as developed scrub, heathland and secondary woodland. The varying structure reflects the woods previous management of high forest, coppice, selective felling and replantation.
Castle Lime Works Quarry SSSI	c. 1.4km north-east	This designation covers c.1.6ha of disused partly backfilled chalk quarry designated for its geological importance. It is in a state of unfavourable declining due to the scrub encroachment, erosion, and badger excavation.
Water End Swallow Holes SSSI	c. 2.7km north-east	Water End Swallow Holes are the only major sinkholes in chalk which are permanent. They constitute the drainage outlet for the largest enclosed karstic basin in England. This site covers more than 15 swallow holes which open up into the River Colne. Throughout the site there are areas of semi-natural woodland, scrub and semi-improved grassland.
Local Designations within 3km		
Furzefield Wood and Lower Halfpenny Bottom LNR	c. 1.9km north-east	The designation comprises c.7.4ha of playing fields, woodland and meadows. The woodland has been managed by coppicing for over 300 years.
Non-Statutory Designations within 1km		
Meadow by St Albans Road LWS	c. 0.3km south-east	Marshy, species-rich unimproved neutral grassland dominated by herbs. Taller fen vegetation is present in the middle of the site. There are mixed species hedges with some encroaching scrub around the perimeter. A shallow dip has been infilled with rubble/spoil and supports some scrub and planted Hybrid Black Poplar <i>Populus x canadensis</i> .
The Grassland west of Greyhound Lane LWS	c. 0.4km south	Species rich semi-improved neutral grassland with little evidence of improvement and areas of invading scrub. The sward is generally rough and supports a good range of grasses and herbs. An area of secondary woodland and scrub, including some planted trees, occurs to the eastern edge.
Mimmshall Brook Pasture LWS	c. 0.7km north-east	Species-rich semi-improved neutral grassland supporting a good number of grassland indicators. Elsewhere hedgerows generally line the perimeter. Water vole <i>Arvicola amphibius</i> has been recorded by the brook.
Hawkshead Wood and Mymmshall Wood LWS	c. 0.8km north	This site has been left as a result of removing SSSIs from Wildlife Sites. The site mainly comprises of broadleaved woodland with little management.
Mimmshall Brook by Mimms Hall LWS	c. 0.8km north-east	Brook supporting marginal emergent vegetation and ruderal plants along the

		banks. A good population of Water Vole has been recorded.
Meadows by Windmore Hall LWS	c. 0.8km east	Three fields with flowery semi-improved neutral grassland supporting a good diversity of herbs. A scrub-lined stream is present to the west perimeter of the site and elsewhere hedgerows and dry ditches generally border the fields.

#### Ancient Woodland

- 4.7 There is no ancient woodland, as shown on the ancient woodland inventory, covering any part of the Site or immediately adjacent land.
- 4.8 No trees on or adjacent to Site are listed on the Ancient Tree Inventory.

#### Habitats and Flora

- 4.9 Habitats recorded on-site are illustrated in Appendix A with detailed species lists provided in Appendix E. Relevant UKHab codes are provided within parentheses for each habitat type recorded [e.g. Other Neutral Grassland (g3c)].

#### Notable Flora Records

- 4.10 The HERC provided 184 records of 56 notable plant species from within the search area. Those of potential relevance to the Site include species which commonly favour hardstanding, gardens and woodland edges such as bluebell *Hyacinthoides non-scripta*, tormentil *Potentilla erecta*, hoary cinquefoil *Potentilla argentea* and crosswort *Cruciata laevipes*.
- 4.11 Of note are also 39 records of six species included within the Wildlife and Countryside Act's Schedule 9 list of invasive non-native species. Those of potential relevance to the Site include Japanese rose *Rosa rugosa*, rhododendron *Rhododendron ponticum*, Japanese knotweed *Fallopia japonica* and giant hogweed *Heracleum mantegazzianum*. None of these species were identified on, or adjacent to the Site.
- 4.12 The Hertfordshire Ecological Network Map provided for the Site and surrounding area suggests that the Site does not contain any mapped existing habitats of any significance.

#### Buildings (u1b5)

- 4.13 Two buildings are present within the Site, one of which is the former public house building (B1). The other is a storage building to the south, comprising two sub-sections (B2a and B2b). These buildings are described further in Appendix F.

#### Developed Land – sealed surface (u1b)

- 4.14 The majority of the Site comprises a car park and hardstanding areas of impermeable artificial surface including paving slabs, with limited ephemeral vegetation including 'weed' species such as prickly lettuce

*Lactuca serriola*, buck's-horn plantain *Plantago cornopus*, butterfly-bush *Buddleja davidii* and poplar *Populus sp.* saplings.

- 4.15 A single semi-mature weeping willow tree is present within the car park to the south of building B2b.

Modified grassland (g4)

- 4.16 Two areas of modified grassland are present within the Site, both with different management regimes and resultant floral diversity (See Habitats Plan within Appendix A).

- 4.17 An area of short sward modified grassland is located within the north-west of the Site, surrounding a war memorial. This grassland shows evidence of regular mowing and comprises abundant perennial rye-grass *Lolium perenne*, with occasional Yorkshire fog *Holcus lanatus*, **hedgerow crane's-bill** *Geranium pyrenaicum* and common field-speedwell *Veronica persica*. Throughout this area are scattered areas of bare ground.

- 4.18 An area of longer sward modified grassland is present to the south of building B1 and B2a, previously managed as a garden for patrons of the former public house. Given the longer sward and encroachment of ruderal species, it is evident that this area has not been subject to recent intensive management and includes, in addition to the above, red dead-nettle *Lamium purpureum*, dandelion *Taraxacum agg.*, scented mayweed *Matricaria chamomilla*, red fescue *Festuca rubra* and **cock's-foot** *Dactylis glomerata*.

Other neutral grassland (g3c)

- 4.19 Grassland present within the south of the Site comprises a long sward and includes species characteristic of other neutral grassland (see Habitats Plan in Appendix A). The sward was tussocky and of a height of c. 20cm. Grass species include meadow foxtail *Alopecurus pratensis*, red fescue, Yorkshire fog and perennial rye-grass. Herbaceous species include creeping buttercup *Ranunculus repens*, meadow buttercup *Ranunculus acris*, cuckoo flower *Cardamine pratensis* and common sorrel *Rumex acetosa*.

Mixed scrub (h3h)

- 4.20 Along the southern boundary of the Site is an area of mixed scrub encroaching from the adjacent church yard. The scrub, which is covered in dense ivy *Hedera helix* comprises elder *Sambucus nigra*, bramble *Rubus fruticosus agg.*, hazel *Corylus avellana* and blackthorn *Prunus spinosa*. The ground flora comprises common nettle *Urtica dioica*, willowherb *Epilobium sp.* and comfrey *Symphytum sp.*

#### Urban built-up areas and gardens, introduced shrub (u1b)

- 4.21 An introduced shrub border is present along a section of the north-eastern Site boundary (see Habitats Plan in Appendix A). The planted border comprises several rose *Rosa sp.* bushes accompanied by ground flora including limited herb and grass species comprising shepherd's-purse *Capsella bursa-pastoris*, groundsel *Senecio vulgaris* and Yorkshire-fog.

#### Other hedgerow (h2b)

- 4.22 A stretch of cherry laurel *Prunus laurocerasus* hedgerow extends along part of the western boundary of the Site. The hedgerow is c. 4m high and c. 2m wide and shows signs of previous management from the on-site side.

### Fauna

#### Bats

- 4.23 A total of 403 bat records were identified within the search area, dating from 1996 to 2017. Of these 109 of which were historic records dating prior to 2000. The records include the following species: Daubenton's bat *Myotis daubentonii*, whiskered bat *Myotis mystacinus*, Natterer's bat *Myotis nattereri*, Nathusius' pipistrelle *Pipistrellus nathusii*, common pipistrelle *Pipistrellus pipistrellus* and brown long-eared bat *Plecotus auritus*. Five records were also provided for 'bat' *Chiroptera spp.*, Myotid *Myotis sp.*, pipistrelle *Pipistrellus sp.* and long-eared bat *Plecotus sp.* which were not identified to species level.
- 4.24 The closest records are of a long-eared bat and Natterer's bat (c. 60m south of the Site). These records were accurate to 100m only and were for an unspecified roost dating from 2011 that is likely to be associated with St Giles Church to the south of the Site. Other roost records were located over c. 0.8km from the Site and associated with buildings and woodlands in the wider landscape.
- 4.25 Details of European Protected Species Licences obtained from Natural England are available on the MAGIC website. A single bat licence record was located within 2km of the Site, c. 1.3km north-east of the Site. The licence covered destruction of a resting place of a common pipistrelle, dating from 2015 (2015-15083-EPS-MIT).
- 4.26 Although limited, there are opportunities for bats to use boundary hedgerows/trees and grassland within the Site for dispersal and foraging. Habitats adjacent to the Site are suitable for bat foraging, dispersal and roosting. Of particular note, is the adjacent church, woodland to the south-east, grassland and scrub mosaics to the south and North Mymms Woods to the north.

### *Preliminary Roost Assessment - Structures*

- 4.27 All on-site structures were assessed for their potential to support roosting bats. Both buildings (labelled B1 and B2a/B2b on the Habitats Plan in Appendix A) are considered to have 'Moderate' potential to support roosting bats. The full results of the building inspection are provided in Appendix F.

### Badger

- 4.28 HERC provided 25 records of badger *Meles meles* from within the search area, dating from 1970 to 2020, with 13 of these records being historic and dating prior to 2000. The closest recent record is of a roadkill in 2004, c. 0.7km from the Site.
- 4.29 The majority of on-site habitats, being comprised of managed grassland and hardstanding, provide no opportunities for badgers to forage or dig setts. The grassland and mixed scrub to the south of the Site provide opportunities for foraging badger, with the adjacent woodland likely suitable for foraging and sett digging.
- 4.30 No evidence of badger was recorded during the survey.

### Dormouse

- 4.31 HERC returned one record of dormouse *Muscardinus avellanarius* within the search area. The record was historic, dating from 1994, and was given to an accuracy of 1.0km, therefore its precise location could not be determined.
- 4.32 The Site lacks the suitable habitat for this species and therefore dormouse are considered absent from the Site.

### Riparian Mammals

- 4.33 A total of three records of water vole *Arvicola amphibius* were identified within the search area, all are historic dating from 1967 to 1996. The closest record is c. 1.2km from the Site and is likely associated with Mimmshall Brook. HERC returned no records of otter *Lutra lutra* within the search area.
- 4.34 No suitable habitat for riparian mammals is present within or adjacent to the Site boundaries. Given the scale, urban location, and distance from suitable watercourses, it is considered that riparian mammals are absent from the Site.

### Other Mammals

#### *Brown Hare*

- 4.35 A total of eight records of brown hare *Lepus europaeus* were identified within the search area, dating from 1984 to 2001, five of which were historic records dating prior to 2000. The closest recent record is located

c. 1.7km north of the Site. Habitat within the Site is not considered suitable for brown hare and it is isolated from suitable habitat within the wider landscape. No evidence of brown hare was recorded during the surveys and therefore this species is considered absent.

#### Hedgehog

- 4.36 HERC returned 21 records of hedgehog *Erinaceus europaeus* within the search area, dating from 1960 to 2021, 12 of which were historic records dating prior to 2000. The closest recent record relates to roadkill c. 0.8km south of the Site. Other recent records are associated with residential areas around Potters Bar and Rushfield, with the closest record c. 1.5km east of the Site.
- 4.37 The long sward grassland and scrub within south of the Site are suitable for hedgehog and provide foraging and hibernation opportunities for this species. Adjacent garden, woodland and church yard habitats provide similar opportunities for this species. No evidence of hedgehog was recorded during the Site survey.

#### Harvest Mouse

- 4.38 HERC returned two records of harvest mouse *Micromys minutus* within the search area, dating from 1967 to 1985. These records were given to an accuracy of 1.0km, therefore their precise location could not be determined.
- 4.39 The majority of habitats within the Site are not suitable for this species. Furthermore, given its isolation from surrounding suitable habitat this species is considered likely absent from the Site.

#### Birds

- 4.40 A total of 5,875 records of 103 bird species were identified within the search area, dating from 1987 to 2000. Those of potential relevance to the Site include red kite *Milvus milvus*, tree sparrow *Passer montanus*, house sparrow *Passer domesticus*, spotted flycatcher *Muscicapa striata*, lesser redpoll *Acanthis cabaret*, barn owl *Tyto alba*, song thrush *Turdus philomelos*, wren *Troglodytes troglodytes*, starling *Sturnus vulgaris*, dunnock *Prunella modularis*, house martin *Delichon urbicum*, swift *Apus apus* and buzzard *Buteo buteo*.
- 4.41 During the site visit an active starling nest with starlings frequently flying to/from the nest was observed above a window on the western aspect of B1 (see Target Note 1 within the Habitats Plan). An active jackdaw *Corvus monedula* nest was also identified within the chimney pot of B1 during a bat emergence survey (see Target Note 2 within the Habitats Plan).
- 4.42 The long sward grassland, mixed scrub and single tree present within the Site provide limited opportunities for birds to forage, shelter and rest. The



Site is expected to support, at most, a very small number of common and widespread generalist species.

#### Reptiles

- 4.43 A total of 11 records of three reptile species were identified within the search area including common lizard *Zootoca vivipara*, grass snake *Natrix helvetica* and slow-worm *Anguis fragilis*. Nine of the records were historic, dating prior to 2000. The closest recent record is for a grass snake c. 1.1km east of the Site. It is isolated from the Site by the A1(M).
- 4.44 The majority of the habitats at the Site provide negligible opportunities for reptiles being buildings, sealed surface and short sward grassland. However, the long sward grassland within the south of the Site provides limited opportunities for foraging, refuge and basking slow worms. No evidence of reptiles was identified during the site visit.

#### Amphibians

- 4.45 A total of 12 records of two amphibian species were identified within the search area, including great crested newt *Triturus cristatus* and common toad *Bufo bufo*. Five of the records are historic, dating prior to 2000. The closest recent record is for great crested newt to the east of the Site. However, these records were given to an accuracy of 1.0km and therefore their precise location could not be determined.

#### *Great Crested Newt*

- 4.46 Despite spending much of their annual lifecycle within the terrestrial environment, great crested newts are dependent upon the presence of suitable aquatic breeding habitat in order for a population to persist. No potential breeding ponds were identified on-site during the site survey, however, three appear to be present over 250m from the Site but still within a dispersible range (refer to the Pond Plan within Appendix C). The closest pond (Pond 1) is c. 0.3km south of the Site. Residential development and main roads represent a barrier for terrestrial great crested newt movement between the identified ponds and the Site.

#### Invertebrates

- 4.47 A total of 413 records of 90 invertebrate species were identified within the search area. Those of potential relevance to the Site include white admiral *Limenitis camilla*, dingy skipper *Erynnis tages*, pearl-bordered fritillary *Boloria Euphrosyne*, chalk hill blue *Polyommatus coridon* and plain golden Y *Autographa jota*.
- 4.48 The Site is not located within an Important Invertebrate Area (IIA) or within a 'B-line', a network comprising 3km wide flower-rich pathways created by Buglife with the aim of delivering wildflower-rich habitats to aid pollinator movement on a landscape scale.

4.49 The Site is formed of common and widespread habitat types and is unlikely to support a locally important assemblage of invertebrates.

## 5.0 DISCUSSION AND RECOMMENDATIONS

### Nature Conservation Designations

#### Wormley-Hoddesdon Park Woods SAC

- 5.1 Wormley-Hoddesdonpark Woods SAC lies c. 9.2km north-east of the Site which is designated for its outstanding examples of oak-hornbeam forest and includes Wormley-Hoddesdonpark Woods South and North; two component SSSIs. Woodland habitats present at the SAC are sensitive to a combination of recreational pressures (i.e. trampling of woodland flora) and nitrogen deposition (i.e. from vehicle emissions). SSSI units in the south are all listed as being in 'favourable' condition, with those in the north a mix of 'favourable' (89.39%) and 'unfavourable'; with a single unit 'unfavourable – no change' (0.58%), two units 'unfavourable – declining' (3.17%) and a further unit 'unfavourable – recovering' (6.86%). However, the unfavourable condition of the four listed units appears to be in relation to management and not recreational pressures.
- 5.2 The Site Improvement Plan for the SAC identifies air pollution and public access/disturbance as threats, with proposals to monitor site features sensitive to disturbance and take remedial action. Actions are also proposed with regard to air pollution and nitrogen deposition.
- 5.3 The proposed development is likely to result in a very modest increase in population (c. 8 units). However, the closest part of the SAC is located c. 9.2km north-east of the Site. Therefore, it is considered unlikely that new residents will make regular visits to the SAC and a small increase in recreational pressure and/or vehicle emissions from the Site is considered unlikely to result in likely significant adverse effects on the integrity of the SAC and its qualifying features.

#### Redwell Wood SSSI and Water End Swallow Holes SSSI

- 5.4 The Site lies c. 0.8km south of Redwell Wood SSSI and 2.7km north-east of Water End Swallow Holes SSSI. Redwell Woods SSSI is designated for its ancient woodland habitats and Water End Swallow Holes is designated for its chalk sinkholes and willow carr/swamp habitats. Habitats present are known to be sensitive to a range of recreational pressures and access is available by Public Rights of Way (PRoW) into and throughout the SSSI.
- 5.5 The Site lies within the impact risk zone for the SSSIs in respect of residential development. However, the development proposals are smaller than the 100 residential unit risk category. Therefore, given the relative distance from the SSSI and size of the development proposals, no significant impacts in respects of recreation are anticipated.

#### Castle Lime Work Quarry SSSI

- 5.6 Castle Lime Works Quarry SSSI is designated for geological features. Therefore, no assessment of ecological affects has been undertaken.

#### Furzefield Wood and Lower Halfpenny Bottom LNR

- 5.7 The LNR lies c. 1.9km north-east of the Site and is designated for its grassland and woodland. It is accessible from the Site by a network of PRoWs and an informal car park area. Whilst it is acknowledged that some of the woodland habitats are sensitive to recreation the site is managed to promote recreation and includes multiple footpaths. Therefore, any impacts are predicted to be at a de minimis level.

#### Local Wildlife Sites LWS

- 5.8 A total of six LWS were identified within 1km of the Site, with the closest over c. 0.3km from the Site. Given the distance from the Site, with the closest CWS being c. 0.3km, no direct impacts are anticipated.
- 5.9 All accessible designations within 1km are likely to be subject to a level of recreational pressure, such as from walkers and bird watchers alike. However, due to the modest increase in units at the Site (c. 8 units) it is unlikely that the development will result in a meaningful increase in footfall locally and therefore recreational effects can be reasonably ruled out for all identified LWSs.

#### Habitats and Flora

- 5.10 In the absence of mitigation, retained hedgerows will be vulnerable to damage during the construction phase from passing construction traffic and ground compaction. Retained trees, including those off-site but adjacent to the construction zone will be protected during the construction phase through compliance with standard arboricultural practice (BS5837:2012).

#### Fauna

##### Bats

- 5.11 All British bat species and their roosts are protected under Regulation 43 of the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended).
- 5.12 The Site offers foraging and navigational opportunities for bats within the boundary hedgerows, trees and mature scrub/ruderal vegetation. To enhance opportunities for foraging/commuting bats at the Site, strengthening of existing hedgerows and new hedgerow planting is recommended.
- 5.13 The buildings on Site were assessed as having 'Moderate' potential to support roosting bats. In accordance with current guidelines, it was recommended that two dusk emergence/dawn re-entry surveys were

carried out between May and August to determine the presence/likely absence of roosting bats within the buildings. These surveys were undertaken in 2023, the results are detailed within the Bat Survey Report (CSA/6115/02/B) which should be reviewed alongside this report.

- 5.14 The proposals are likely to result in an increase in artificial lighting at the Site. Artificial lighting of retained and created habitat during construction and operational phases has the potential to disturb bats and other nocturnal wildlife. To ensure ecological functionality of retained hedgerows and boundary habitats for bats a sensitive external lighting scheme will be prepared. The future lighting scheme will be developed in consultation with a bat ecologist to avoid/minimise light spill onto retained and created habitat. This is to maintain dark corridors for bats and other nocturnal wildlife.

#### Birds

- 5.15 All wild birds are protected from killing and injury, and their nests and eggs are protected from damage and destruction, under the Wildlife and Countryside Act 1981 (as amended). Therefore, any clearance of nesting habitat or features required to facilitate the development should avoid the period between March and August (inclusive) when nesting birds are most likely to be present. If this is not possible, habitat will need to be checked for nesting birds by a suitably qualified ecologist prior to clearance with works only proceeding if no nesting evidence or behaviour are observed.
- 5.16 Evidence of bird nesting within building B1 was recorded at the time of survey. Works impacting the area should therefore be undertaken outside of the nesting bird season (March to August, inclusive). If this is not possible then the building will need to be checked for nesting birds prior to clearance.

#### Reptiles

- 5.17 The mixed scrub and long-sward grassland within the south of the Site provides basking and foraging habitats for reptiles. All British reptile species are listed within Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and are afforded protection against killing and injury under parts of sub-section 9(1) of the Act.
- 5.18 This habitat is proposed to be retained but is likely to be subject to a more intensive cutting regime which will reduce the current sward height. As such it is proposed that phased strimming of vegetation within the south of the Site is undertaken outside of the hibernation period (c. October to end – February inclusive) to encourage movement of reptiles to habitats off-site to the south.

### Summary of Recommendations

5.19 Based on the ecological constraints identified above, Table 2 summarises recommendations for further work necessary to determine the need for, and scope of, any avoidance, mitigation and/or compensation measures to address potential adverse effects of development. The outcome of this further work will inform an EclA of the final scheme.

Table 2. Recommendations for further investigation/survey

Ecological Feature	Further Work	Applicable Timescales
Bats	Dusk/pre-dawn emergence/return surveys of Buildings B1 and B2	May - August

### Opportunities for Ecological Enhancement

5.20 To promote adherence to the NPPF and Hertsmere local policy the following opportunities for ecological enhancement have been identified:

- Provision of new bat roosting and bird nesting opportunities within new buildings and retained mature trees
- Incorporation of native plants and those of wildlife importance into a landscaping scheme to provide foraging opportunities for birds, invertebrates and birds
- Provision of hedgehog gaps (13x13cm) in new fencing to promote habitat connectivity for small mammals across and within the Site

## 6.0 CONCLUSIONS

- 6.1 A detailed internal and external inspection was undertaken of the on-site buildings, alongside a Site walkover of adjacent habitats to establish the habitats present and potential for notable/protected species.
- 6.2 The buildings on-site were found to have 'Moderate' potential to support roosting bats. Habitats suitable for nesting birds and reptiles have been recorded on site, including building B1, grassland, mixed scrub and hedgerows.
- 6.3 The following additional investigation/survey work is recommended, such that suitable ecological impact avoidance, mitigation and/or compensation measures may be adopted:
  - Bat surveys
- 6.4 Opportunities for ecological enhancement have also been set out in line with local and national planning policy (i.e. NPPF, 2023). No overriding constraints to development have been identified subject to the implementation of appropriate mitigation measures in respect of confirmed ecological constraints, and further recommended survey work.

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Appendix A

Habitats Plan



- Site boundary
- Hedgerows (h2a)
- Tree
- Other neutral grassland (g3c)
- Modified grassland (g4)
- Mixed scrub (h3h)
- Developed land, sealed surface (u1b)
- Buildings (u1b5)
- Ornamental planting



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<b>Project</b>	The White Hart, South Mimms	<b>Date</b>	April 2024	<b>Drawing No.</b>	CSA/6115/100
<b>Drawing Title</b>	Habitat Plan	<b>Scale</b>	Refer to scale	<b>Rev</b>	B
<b>Client</b>	Griggs (South Mimms) Limited	<b>Drawn</b>	RB	<b>Checked</b>	AC

## Appendix B

### Legislation and Planning Policy

- 1.1. The Conservation of Habitats and Species Regulations 2017 (as amended) make prescriptions for the designation and protection of **Sites of Community Importance** ('European sites', i.e. Special Areas of Conservation and Special Protection Areas) and European Protected Species (EPS). The latter include all native bats, great crested newts, dormice, otters and certain reptiles, listed under Annex II of the Regulations. **Following the UK's departure from the European Union, the provisions of the Regulations have been retained through enactment of the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019, which came into force on 31 December 2020.**
- 1.2. The Wildlife and Countryside Act 1981 (as amended, principally by the Countryside and Rights of Way Act 2000) forms the basis for protection of statutory designated sites of national importance (e.g. Sites of Special Scientific Interest; SSSIs) and native species that are rare and vulnerable in a national context. Additionally, badgers are protected under the Protection of Badgers Act 1992.
- 1.3. The Environment Act 2021 received Royal Assent in November 2021. Through an amendment to the Town and Country Planning Act 1990 the Environment Act will introduce a mandatory requirement for all planning permissions to be conditional upon the submission of a Biodiversity Gain Plan for approval by the Local Planning Authority. The Plan will need to demonstrate a net gain of at least 10% in the biodiversity value of the development site. These provisions are not yet in force, pending their enactment through secondary legislation.
- 1.4. Section 40(1) of the Natural Environment and Rural Communities (NERC) Act 2006 states that each 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." This legislation makes it clear that planning authorities should consider impacts to biodiversity when determining planning applications, with particular regard to the Section 41 (S41) lists of 56 habitats and 943 species of principal importance. The UK Biodiversity Action Plan (BAP) has been superseded by the Biodiversity 2020 Strategy, however Local BAPs continue to influence biodiversity management and conservation effort, including through the spatial planning system, at the local scale.
- 1.5. The National Planning Policy Framework (2023) (NPPF) sets out government planning policies for England and how they should be applied. With regards to ecology and biodiversity, Chapter 15: Conserving and Enhancing the Natural Environment, paragraph 174, states that the planning system and planning policies should minimise impacts on and provide net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

- 1.6. Paragraph 180 sets out the principles that local planning authorities should apply when determining planning applications:
- 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.
  - Development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest.
  - Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.
  - Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.
- 1.7. Accompanying the NPPF, central government guidance on the implementation of planning policies is set out within online Planning Policy Guidance (PPG). The Natural Environment PPG addresses principles across a broad spectrum of topics targeting biodiversity conservation, from individual site and species protection through to the supporting of ecosystem services, and the use of local ecological networks to support the national Nature Recovery Network. In particular, the PPG promotes the delivery of measurable Biodiversity Net Gain through the creation and enhancement of habitats alongside development.
- 1.8. The Government Circular 06/2005, which is referred to within the NPPF, defines statutory nature conservation sites and protected species as a material consideration in the planning process.
- 1.9. Local planning policies of relevance to ecology, biodiversity and/or nature conservation have been set out in Table 1 below.

Table 1. Summary of regional and local planning policy relating to ecology

Policy	Summary
Hertsmere Local Plan	
Policy CS12 The Enhancement of the Natural Environment	<p>“All development proposals must conserve and enhance the natural environment of the Borough, including biodiversity, habitats, protected trees, landscape character, and sites of ecological and geological value, in order to maintain and improve environmental quality, and contribute to the objectives of the adopted Greenways Strategy and the Hertsmere Green Infrastructure Plan. Proposals should provide opportunities for habitat creation and enhancement throughout the life of a development.”</p>
Policy CS13 The Green Belt	<p>Limited infilling within the village envelopes of those parts of Elstree, Shenley and South Mimms which are in the Green Belt will be considered appropriate, provided that it is sympathetic to its surroundings, retains and protects features essential to the character and appearance of the village and complies with other relevant policies in this Plan. Village envelopes for Elstree, Shenley and South Mimms for limited infilling will be identified through the Site Allocations DPD.”</p>

## Appendix C

### Desk Study Information





- Site boundary
- 10km buffer
- Special Areas of Conservation



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<b>Project</b>	The White Hart, South Mimms	<b>Date</b>	October 2023	<b>Drawing No.</b>	CSA/6115/101
<b>Drawing Title</b>	Nature Conservation Designations: National & Local, Statutory 10 km buffer	<b>Scale</b>	Refer to scale	<b>Rev</b>	A
<b>Client</b>	Griggs (South Mimms) Limited	<b>Drawn</b>	RB	<b>Checked</b>	AC



- Site boundary
- 3km buffer
- Local Nature Reserves (LNR)
- Sites of Special Scientific Interest (SSSI)







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<b>Drawing Title</b>	Nature Conservation Designations: National - Local Statutory 3km buffer	<b>Scale</b>	Refer to scale	<b>Rev</b>	A
<b>Client</b>	Griggs (South Mimms) Limited	<b>Drawn</b>	RB	<b>Checked</b>	AC



-  Site boundary
-  500m Buffer
-  250m Buffer
-  Ponds



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<b>Project</b>	The White Hart, South Mimms	<b>Date</b>	October 2023	<b>Drawing No.</b>	CSA/6115/103
<b>Drawing Title</b>	Pond Plan	<b>Scale</b>	Refer to scale	<b>Rev</b>	A
<b>Client</b>	Griggs (South Mimms) Limited	<b>Drawn</b>	RB	<b>Checked</b>	AC

Appendix D

Photographs



Photograph 1. Eastern aspect of B1 (former public house) building).



Photograph 2. Loft void in B1.



Photograph 3. Western aspect of B2a (storage building).



Photograph 4. Interior of B2.



Photograph 5. Other neutral grassland to the south of the Site, with the adjacent church.



Photograph 6. Modified grassland to the north of the Site, with the war memorial.

## Appendix E

### Habitats and Flora Species List

Table 1. Habitat and Flora Species List

Site Name		The White Hart, South Mimms						
Survey Date and Surveyor(s)		04/05/2023 Alexandra Cole and Rosie Billington						
Scientific Name	Common Name	Habitat Parcel Number/Habitat Type						
		Developed land - sealed surface (u1b)	Modified grassland - short sward (g4)	Modified grassland - long sward (g4)	Other neutral grassland (g3c)	Urban built-up areas and gardens (u1b): Introduced scrub (1160)	Mixed scrub (h3h)	Other hedgerow (h2b)
<b>Bryophytes</b>								
<i>Rhytidiadelphus squarrosus</i>	Springy turf-moss	X						
<b>Herb Species</b>								
<i>Achillea millefolium</i>	Yarrow		X	X	X			
<i>Aegopodium podagraria</i>	Ground-elder				X			
<i>Anthriscus sylvestris</i>	Cow parsley				X			
<i>Aphanes arvensis</i>	Parsley-piert		X					
<i>Bellis perennis</i>	Daisy		X	X	X	X		
<i>Capsella bursa-pastoris</i>	Shepherd's-purse	X				X		
<i>Cardamine flexuosa</i>	Wavy bitter-cress		X					
<i>Cardamine pratensis</i>	Cuckooflower				X			
<i>Centaurea nigra</i>	Common knapweed			X				
<i>Cerastium sp.</i>	Common mouse-ear	X	X			X		
<i>Chamerion angustifolium</i>	Rosebay willowherb			X				
<i>Chelidonium majus</i>	Greater celandine	X		X				
<i>Cirsium arvense</i>	Creeping thistle		X		X			
<i>Cirsium vulgare</i>	Spear thistle			X		X		
<i>Conium maculatum</i>	Hemlock			X				
<i>Epilobium sp.</i>	Willowherb	X			X	X		
<i>Equisetum arvense</i>	Field horsetail				X			
<i>Galium aparine</i>	Cleavers	X		X	X			
<i>Geranium dissectum</i>	Cut-leaved crane's-bill				X			
<i>Geranium molle</i>	Dove's-foot crane's-bill		X					
<i>Geranium pyrenaicum</i>	Hedgerow crane's-bill		X	X	X	X		
<i>Helminthotheca echioides</i>	Bristly oxtongue	X		X				
<i>Hyacinthoides non-scripta</i>	Bluebell				X			
<i>Iris sp.</i>	Iris			X				
<i>Lactuca serriola</i>	Prickly lettuce	X				X		
<i>Lamium album</i>	White dead-nettle				X			
<i>Lamium purpureum</i>	Red dead-nettle			X	X	X		
<i>Malva sp.</i>	Mallow	X	X	X				
<i>Matricaria chamomilla</i>	Scented mayweed			X				
<i>Narcissus sp.</i>	Daffodil		X					
<i>Plantago coronopus</i>	Buck's-horn plantain	X	X			X		
<i>Plantago lanceolata</i>	Ribwort plantain		X		X			
<i>Plantago major</i>	Greater plantain			X				
<i>Potentilla reptans</i>	Creeping cinquefoil	X			X			
<i>Ranunculus acris</i>	Meadow buttercup				X			
<i>Ranunculus repens</i>	Creeping buttercup			X	X			
<i>Reseda luteola</i>	Weld			X				
<i>Rumex acetosa</i>	Common sorrel				X			
<i>Rumex obtusifolius</i>	Broad-leaved dock			X	X			
<i>Rumex sanguineus</i>	Wood dock				X			
<i>Senecio jacobaea</i>	Common ragwort			X	X	X		
<i>Senecio vulgaris</i>	Groundsel	X		X		X		
<i>Sonchus sp.</i>	Sowthistle	X		X				
<i>Stachys sylvatica</i>	Hedge woundwort			X		X		
<i>Stachys byzantina</i>	Lamb's ear			X				
<i>Stellaria media</i>	Common chickweed	X						
<i>Symphytum sp.</i>	Comfrey						X	
<i>Taraxacum agg.</i>	Dandelion	X	X	X	X	X		
<i>Trifolium repens</i>	White clover		X					
<i>Trifolium sp.</i>	Clover			X				
<i>Urtica dioica</i>	Common nettle			X	X		X	
<i>Veronica chamaedrys</i>	Germander speedwell					X		
<i>Veronica persica</i>	Common field-speedwell		X					
<b>Grasses</b>								
<i>Alopecurus pratensis</i>	Meadow foxtail				X			
<i>Cynosurus cristatus</i>	Crested dog's-tail				X			
<i>Dactylis glomerata</i>	Cock's-foot		X	X				
<i>Festuca rubra</i>	Red fescue			X	X			
<i>Holcus lanatus</i>	Yorkshire-fog	X	X	X	X	X		
<i>Lolium perenne</i>	Perennial rye-grass	X	X	X	X			
<i>Poa annua</i>	Annual meadow-grass	X	X					
<b>Woody Species</b>								
<b>Broadleaved</b>								
<i>Buddleja davidii</i>	Butterfly-bush	X						
<i>Corylus avellana</i>	Hazel						X	
<i>Crataegus monogyna</i>	Hawthorn						X	
<i>Hedera helix</i>	Ivy						X	
<i>Ilex aquifolium</i>	Holly	X						
<i>Populus sp.</i>	Poplar sp.	X						
<i>Prunus laurocerasus</i>	Cherry laurel							X
<i>Prunus spinosa</i>	Blackthorn				X		X	
<i>Prunus sp.</i>	Prunus (domesticated)			X			X	
<i>Rosa sp.</i>	Rose					X		
<i>Rubus fruticosus agg.</i>	Bramble	X		X			X	
<i>Salix babylonica</i>	Weeping willow							
<i>Sambucus nigra</i>	Elder	X					X	

## Appendix F

Bats



## 1.0 Legislation

1.1 All British bat species are legally protected under Regulation 43 of the Conservation of Habitats and Species Regulations 2017 (as amended). These Regulations make it an offence to:

- Deliberately capture, injure, or kill a bat
- Deliberately disturb bats, impairing their ability to survive, breed, reproduce or rear/nurture their young, or which significantly affects the local distribution or abundance of the species
- Damage or destroy a breeding site or resting place used by bats

1.2 All bats and their roosts in the UK were previously fully protected under the Wildlife & Countryside Act 1981 (as amended). Amendments to the Act have removed most provisions as they relate to bats, however it remains an offence to:

- Intentionally or recklessly disturb a bat while it is occupying a structure or place which it uses for shelter or protection
- Intentionally or recklessly obstruct access to any structure or place used for shelter or protection

1.3 It is important to note that bat roosts are protected throughout the year, regardless of whether or not bats are present at the time. Under the Regulations, the offence of damaging or destroying a breeding site or resting place is subject to 'strict liability', i.e. an offence is committed irrespective of whether the causal act was deliberate or otherwise.

1.4 Where development is proposed that would result in an offence under the Regulations, a European Protected Species (EPS) statutory derogation licence (often termed 'EPS Mitigation Licence') will need to be secured from Natural England to permit an act that would otherwise be unlawful. Such a licence can only be granted following receipt of planning permission with all relevant conditions discharged, and where it has been demonstrated that specific statutory derogation tests have been met.

## 2.0 Methods

2.1 The following survey methods, design, data analysis and interpretation have been undertaken with due consideration of the Bat Conservation Trust (BCT) guidelines 3rd edition (Collins, 2016).

### Preliminary Roost Assessment (PRA)

#### *Structures*

2.2 A detailed external and internal inspection of all buildings on-site was completed on 04 May 2023, using high-powered torches, binoculars and ladder as appropriate. The survey was carried out by Alexandra Cole

MCIEEM (Natural England Class Licence WML-CL18, Registration Number 2016-25563-CLS-CLS) and Rosie Billington.

- 2.3 External inspection focused on identifying potential bat access points to the interior of each structure and any external features that could potentially be used by crevice-dwelling species. Particular attention was given to window sills, window panes, weatherboarding, and pitch/ridge tiles; as evidence is typically found in these locations.
- 2.4 The internal inspection involved a systematic search for bats or any evidence of their activity, in particular droppings and/or feeding remains within the building(s)/loft spaces of the building(s).
- 2.5 A description of the structures was made, including construction, condition (in respect of roosting, rather than building or structural integrity) and age (where known).
- 2.6 The aim of this inspection is to record direct (i.e. actual roosting bats) or indirect evidence of roosting bats (e.g. droppings), as well as the nature and number of features with 'potential' to support roosting bats. This includes consideration of structures to support bats whilst in hibernation.

#### *Assessing 'Potential' of Buildings to Support Roosting Bats*

- 2.7 All structures were assigned to one of four categories in respect of their 'potential' to support roosting bats, or the confirmation of any bat roosts identified. 'Potential' in this context is taken to be the broad suitability of features to support roosting bats, based upon the nature, condition or structure of such features, in the absence of confirmed evidence of roosting.
- 2.8 Assigning the following categories is intended to determine the effort of any further targeted survey or inspections which are necessary to prove presence or likely absence of roosting bats, rather than to assign importance to such features.
- 2.9 The following categories are assigned to structures and/or trees herein, Either:
  - *Confirmed Roost* – where one or more bat roosts are identified during PRA inspections, either through direct sightings of bats, and/or indirect evidence such as bat droppings. Or;
  - *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, assessments at this stage are made irrespective of species conservation status).

- *Low* – A structure or tree 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).
- *Negligible* – Negligible habitat features on site likely to be used by roosting bats.

2.10 The potential of a tree or structure to support roosting bats is often influenced by its age and construction, thermal stability, lighting and levels of human activity. Furthermore, the proximity to foraging habitat - particularly woodland, parkland and wetland- as well as the presence of navigational routes (e.g. hedgerows, treelines and watercourses) influence both the potential for bats to roost, as well as the species which may roost. Professional judgement is therefore applied, based upon known factors which effect the potential of features to support roosting bats, insofar as determining the need or scope of further surveys or inspections.

#### *Limitations*

2.11 Internal access within the roof voids of building B1 was limited due to H&S restrictions and limited accessibility. However, the majority of the voids could be viewed from the limited access points and high-powered torches were used to assist in viewing the voids and potential roosting features, thus reducing the limitation.

### 3.0 Results

#### Preliminary Roost Assessment (PRA)

3.1 Buildings on-site comprise a former public house (B1) and a single storey outbuilding (B2) within the adjacent car park. Neither building was occupied/in-use at the time of survey. No bats or evidence of roosting bats was identified in association with the exterior or interior of either building.

3.2 Building 1 (B1) is brick-built and comprises two storeys, with some single storey sections and dormer rooms along the northern aspect of the building. The roof is multi-pitched including a mix of flat roofed sections covered in bitumen felt and pitched roofs with clay roof tiles. The roof tiles are uneven, creating small gaps and crevices. The window frames are wooden with the majority being sash windows. The windows are well-fitting with some peeling paint, but no gaps suitable to support roosting bats. Wooden boarding covers an external stairwell on the south of the building with render also present on the southern aspect. Where render

is present, this is in-tact with no gaps evident. Soffit boxes all appeared tightly fitting and in good condition.

- 3.3 Internally, the multi-pitched roof creates two accessible roof voids. The first accessible void is located on the north-eastern aspect of the building, adjacent to the dormer rooms. This void is open to the dormer rooms but otherwise well-sealed, with no external light ingress. The tiles are lined with in-tact bitumen roofing felt with wooden rafters and cross beams creating a shallow pitch. Fibre glass insulation lines the floor with pest control boxes also present. No evidence of bats was identified within the void.
- 3.4 The second roof void runs along the western aspect of the building. This void was noted to be draughty, although light ingress is minimal. The void has a pitched roof with wooden rafters and in-tact bitumen roofing felt. Fibreglass insulation lines the floor. A metal ventilation shaft exits on the eastern aspect of the roof and can be seen from the exterior of the building. This is tightly fitted, with no gaps evident. No evidence of bats was identified within the void.
- 3.5 A basement is also present within B1. No gaps are present which allow access into the basement which comprises well-sealed brickwork and an access hatch which is also well-sealed with no gaps. No light ingress was evident within the basement and no evidence of bats was identified.
- 3.6 Given the opportunities afforded to bats by features created by lifted roof tiles, B1 is assessed to have 'Moderate' potential to support roosting bats.
- 3.7 Building 2 (B2) is an outbuilding, formally used as storage. The building runs west to east and is divided internally into two sections, referred to as B2a and B2b. B2 is brick-built, with a single pitched clay tile roof. No void is present. The clay roofing tiles are uneven with gaps providing potential roosting opportunities for bats. The tiles are lined with bitumen roofing felt which has a number of tears but is otherwise intact. The western aspect of the building comprises unlined wooden cladding, with chicken wire on the interior. The dividing wall between the two sections of building is brick-built to the eaves, with a wooden timber frame covered with chicken wire between the top of the wall and the ridge of the roof preventing access between the two sections. On the east of the building, along the eaves of B2b, the interior of the building can be accessed via the eaves. However, the eaves of B1a are blocked with chicken wire. Windows are present on the northern and eastern aspects of B2 and therefore the interior is well lit during the day. Given the opportunities afforded to bats by features created by lifted roof tiles, in addition to the opportunities for access within the eaves of B2b, B2 is assessed to have 'Moderate' potential to support roosting bats.



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