AtkinsRéalis

Ecological Impact Assessment

HMCTS

March 2025

20250010_Sovereign House_EcIA_AtkinsRealis_2025

HMCTS SOVEREIGN HOUSE

Notice

This document and its contents have been prepared and are intended solely as information for HMCTS and use in relation to the establishment of the Tribunals Courts within the grounds of the Sovereign House (hereafter referred to as the 'Proposed Scheme').

AtkinsRéalis UK Limited assumes no responsibility to any other party in respect of or arising out of or in connection with this document and/or its contents.

No liability is accepted for any costs claims or losses arising from the use of this document, or any part thereof, for any purpose other than that which it has specifically been prepared or for use by any party other than HMCTS.

The information which AtkinsRéalis UK Limited has provided has been prepared an environmental specialist in accordance with the Code of Professional Conduct of the Chartered Institute of Ecology and Environmental Management. AtkinsRéalis UK Limited confirms that the opinions expressed are our true and professional opinions.

This document does not purport to provide legal advice.

Baseline habitat classification and mapping undertaken for this assessment has used the UK Habitat Classification v2.0 system under licence (*© UKHAB LTD, under licence. No onward licence implied or provided. All rights reserved [https://ukhab.org/register/]*).

This document has 67 pages including the cover.

Document history

Document title: Ecological Impact Assessment

Document reference: 20250010_Sovereign House_EcIA_AtkinsRealis_2025

Revision	Purpose description	Originated	Checked	Reviewed	Authorised	Date
1.0	Final for Issue	LH	AR	VH		12/03/2025

Client signoff

Client	HMCTS
Project	HMCTS SOVEREIGN HOUSE
Job number	100099718.008
Client signature/date	

Contents

Report Validity 8

1. Introduction 9

1.1 Terms of Reference 9

1.2 The Application Site 9

1.3 The Proposed Scheme 10

1.4 Scope of Assessment 10

2. Methodology 11

2.1 Zones of Influence 11

2.2 Desk Study and Consultation 11

2.3 Planning Policy Review 12

2.4 Ecological Field Surveys 12

2.5 Identifying Important Ecological Features 16

2.6 Impact Assessment 17

2.7 Mitigation Hierarchy 18

3. Baseline Conditions and Importance 20

3.1 Overview 20

3.2 Statutory and Non-statutory Designated Sites 20

3.3 Irreplaceable Habitats 20

3.4 Habitats 20

3.5 Protected and Priority Species 22

3.6 Summary of Important Ecological Features 27

3.7 Invasive Non-native Plant Species 28

4. Potential Impacts 29

4.1 Construction Impacts 29

4.2 Operational Impacts 29

5. Design Features and Mitigation Measures 30

5.1 Overview 30

5.2 Design Features 30

5.3 Mitigation Measures 31

6. Impact Assessment 34

6.1 Overview 34

6.2 Residual Effects 34

6.3 Biodiversity Enhancements 38

6.4 Ecological Management and Monitoring Plan 38

7. Conclusion **39**

APPENDICES **40**

Tables

Table 2-1 - Desk study search areas 12

Table 2-2 - Further Ecological Surveys 15

Table 3-1 - Habitat types within the Survey Area 21

Table 3-2 - Summary of Important Ecological Features 28

Table 3-3 - Invasive non-native species 28

Table 6-1 - Summary of construction impacts, mitigation and residual effects on Important Ecological Features 36

Table 6-2 - Summary of operational impacts, mitigation and residual effects on Important Ecological Features 36

Table B-1 - Guidelines for assessing the potential suitability of the Application Site for bats 45

Table E-1 - Target notes and photographs 60

Table E-2 - PRA details 63

Table F-1 - Summary of habitats within the Site (Bold species are Schedule 9 in WCA) 66

Table F-1 - Bat roost survey results ..... **Error! Bookmark not defined.**

Table F-2.1 - Badger Sett (summary results) ..... **Error! Bookmark not defined.**

Table F-3.3 - Badger Sett (detailed results) ..... **Error! Bookmark not defined.**

Table F-4.4 - Badger Field Signs (detailed results) ..... **Error! Bookmark not defined.**

Table F-5.5 - Badger sett monitoring results ..... **Error! Bookmark not defined.**

Table F-6 - Breeding bird survey results ..... **Error! Bookmark not defined.**

Figures

Figure A-1 - Site Location Plan 41

Figure A-2 - Proposed Scheme Plan 43

Figure D-1 - Priority Habitats within 500 m of the Site 56

Figure E-1 - UKHab Survey Plan and Target Notes 58

Non-technical Summary

Report purpose	This report describes the ecological baseline and evaluates the nature conservation importance of ecological features present within the zone of influence for the Proposed Scheme. The assessment identifies impacts (both positive and negative) on important ecological features, sets out agreed avoidance, mitigation, compensation and enhancement measures and provides details on the significance of residual effects for each important ecological feature.
Proposed Scheme	The development involves the establishment of the Tribunals Courts (hereafter referred to as the 'Proposed Scheme') within the grounds of the Sovereign House (hereafter referred to as the 'Application Site'). It is anticipated the construction period will last approximately 39 weeks. The proposed start date for the works is 17/04/2026.
Desk studies and field surveys	The ecological information presented within this report was obtained during the following: • A desk study, conducted in January 2025, with species, habitat and designated site records obtained from Thames Valley Environmental Records Centre (TVERC). • An ecological walkover survey conducted in January 2025.
Ecological features	No statutory designated sites are located within 1 km of the Application Site. No non-statutory designated sites are located within 500 m of the Application Site. No irreplaceable habitats are located within 500 m of the Application Site. Eight parcels of deciduous woodland within 500 m of the Application Site, with the closest parcel located approximately 260 m northeast of the Application Site. The Application Site has suitability to support the following protected/priority species: roosting, commuting and foraging bats, breeding birds, hedgehog and priority invertebrates.
Potential impacts and effects	Following an assessment of the Proposed Scheme, the following impacts on Important Ecological Features (IEF) within the Zone of Influence were identified: ▪ Temporary habitat loss (e.g. land used during construction that is subsequently to be reinstated; ▪ Habitat degradation (e.g. through sediment release, pollution events, and dust); ▪ Injury or mortality of protected and priority species; ▪ Disturbance including noise and vibration to protected and priority species; and ▪ Permanent habitat loss (for bats and birds). Following an assessment of the baseline conditions of the Application Site, the following IEFs were considered within the impact assessment: Bats.
Avoidance, mitigation and compensation measures	In addition to best practice guidance, the following mitigation will be implemented throughout construction: • Trees should be retained and protected wherever possible. • Any works undertaken that could impact directly on, or impact habitats supporting commuting and foraging bats, breeding birds, priority invertebrates and hedgehog should be completed in accordance with a Precautionary Method of Working (PMW). The PMW will detail control methods aimed at minimising ecological impacts and avoiding wildlife offences during the construction phase, including those described below (e.g. sensitive timing of works, locations of ecological watching brief of phased vegetation clearance and hand searches, etc.).

	• An appropriately qualified ecological clerk of works (ECoW) should be present to carry out the pre-works checks and provide advice during the proposed works. All site workers should attend a Toolbox Talk induction by the ECoW ahead of the proposed works commencing. • Plant and materials should be stored on areas of hardstanding or bare ground, and anything left on site overnight should be carefully checked by hand the following morning. • A Habitat Management and Monitoring Plan will be produced for the site and will detail the methods for habitat creation, management and monitoring. This will be implemented during and post construction to ensure success of created habitats. • Night-time working should be avoided. If night-time working or night-time security lighting is required, lighting should be sensitive to nocturnal species and follow best practice guidance. • A sensitive lighting scheme for bats will be implemented at the site as far is reasonably practicable within the confines of the scheme. Three bat boxes will be installed at the Application Site to compensate for loss of potential roosting resource. The siting, management and maintenance of these bat boxes will be outlined in the Ecological Management and Monitoring Plan (EcMMP).
Further surveys	One emergence survey for bats will be conducted on the main building (Sovereign House) in June 2025 to confirm if any bats are roosting in the building. The above-mentioned pre-construction bat survey for will be undertaken to verify and, where required, update the baseline ecological conditions set out in this EcIA.
Significance of residual effects	Taking into account the avoidance, mitigation and compensation, the Proposed Scheme conforms to National Planning Policy Framework (NPPF) and local planning policy. It is concluded that the Proposed Scheme will not result in a significant residual effect on any IEF throughout construction or operation.
Biodiversity Net Gain	A Biodiversity Net Gain assessment has been undertaken for the Application Site and is provided in a separate report.
Opportunities for biodiversity enhancement measures	The following opportunities for enhancement have been made for the Proposed Scheme: • Log piles and hibernacula will be created within the proposed wildflower grassland and scrub. The location of log piles will be decided by a suitably qualified ecologist, with the creation, placement and management outlined in an EcMMP. • Bird boxes targeting common garden species should be retained and additional boxes installed on retained trees around the site. The type, siting, management and monitoring of these boxes will be detailed in the EcMMP. • Existing habitats within the Application Site and surrounding area should be improved and enhanced for biodiversity through the planting and seeding of suitable native plant species and appropriate management. • The removal of Schedule 9 Invasive Non-Native Plant Species within the Application Site, including cotoneaster, should be completed by a suitably qualified contractor. The removal of additional invasive non-native plant species within the Application Site, including snowberry and cherry laurel. • It is recommended that the mixed scrub habitat (replacing the removed introduced shrub) comprises of locally sourced native species of local provenance and include a diverse mixture of species which will benefit local biodiversity, including native plant species which are known to be valuable to pollinators. • Native shrubs planted as part of the landscaping scheme should include fruit and berry-bearing species which provide year-round foraging opportunities for birds, along with species that are known to be valuable to pollinators.

Report Validity

In the event of scope or programme changes or if works do not commence within 12 months of the date of this report, then updates to the surveys may be required to ensure the validity of the data, as per Chartered Institute of Ecology and Environmental Management guidance[1].

[1] CIEEM (2019) *Advice Note on the Lifespan of Ecological Reports and Surveys*.

1. Introduction

1.1 Terms of Reference

1.1.1. AtkinsRéalis was commissioned by HMCTS to undertake an Ecological Impact Assessment (EcIA) in connection with an establishment of the Tribunals Courts within the grounds of Sovereign House (hereafter referred to as the Proposed Scheme).

1.1.2. This EcIA is intended to demonstrate how the Proposed Scheme accords with relevant planning policy and legislation.

1.1.3. The Proposed Scheme is near Reading, as identified by the planning red line boundary shown on the Site Location Plan shown on Figure A.1 within Appendix A (hereafter referred to as the Application Site).

1.1.4. This report presents the results of the EcIA for the Proposed Scheme and considers both terrestrial and aquatic ecological receptors, which include statutory and non-statutory designated sites for nature conservation, terrestrial and freshwater habitats, and species. The assessment has been informed by a desk study and field survey data. This EcIA describes the ecological baseline and evaluates the nature conservation importance of ecological features present within the Zone of Influence[2] for the Proposed Scheme, characterises the impacts on Important Ecological Features[3], sets out agreed avoidance, mitigation, compensation and enhancement measures, and assesses the significance of the residual effects of the Proposed Scheme on the Important Ecological Features.

1.1.5. This EcIA has been undertaken with reference to current good practice[4] and forms part of the technical information lodged with the full planning application submission. The ecological specialists who have authored this report are committed environmental professionals who are appropriately qualified and have a demonstrable knowledge, experience, and competence in the field of nature conservation. The production of this EcIA report has been overseen by competent experts that are full members of the Chartered Institute of Environmental and Ecological Management (CIEEM).

1.1.6. A Biodiversity Net Gain assessment has been undertaken as part of the Scheme and results are presented within a separate report[5].

1.2 The Application Site

1.2.1. The Application Site is located at Ordnance Survey National Grid reference (OSNGR) SU 71597 74061 in Reading and is approximately 0.35 ha. The Site consists of Sovereign House, the associated parking and ornamental planting, two small brick outbuildings and an access track leading north towards the River Thames. The Site is located in a primarily urban environment, with Reading railway station and the Main Western rail line to the south, residential and business units to the west, business units to the east and the River Thames to the north. In the wider surroundings, Christchurch meadows are located north of the River Thames and Kings meadow is located east of the Site, with a rowing lake further east.

---

[2] Zone of Influence is the area(s) over which ecological features may be affected by the biophysical changes caused by the proposed project and associated activities.
[3] An important ecological feature is a species, habitat, ecosystem and/or their function/service that is considered to be important and potentially affected by the project. A full definition is provided in Section 2
[4] CIEEM (2018) *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine*. *Version 1.2 (updated April 2022)*. Chartered Institute of Ecology and Environmental Management, Winchester.
[5] AtkinsRéalis (2025) Sovereign House: BNG Report. AtkinsRéalis

1.2.2. The Application Site is shown on Figure A.1 in Appendix A (as shown in the planning application).

1.3 The Proposed Scheme

1.3.1. The Proposed Scheme involves the conversion of Sovereign House into Reading Tribunals Courts.

1.3.2. Internally, the requirements of this are, 1no. SSCS tribunal (with dias), 6no. employment tribunals, 10no. judicial offices, 1no. staff meeting room, staff admin area with tea point for 16 staff, 1no. medical room / prayer & contemplation / wellbeing room (multifunction space) - 1no claimants waiting room for 10 people, 1no. respondent waiting for 10 people, consultation rooms, server / comms rooms, a security office and reception.

1.3.3. Externally, a secure car park (gated and fenced) and a new lift are required to provide level access to the secure corridor. This involves the provision of a new external structure to house the new lift on the northern side of the building and the expansion of the existing roof plant enclosure from 46 m2 total to 75 m2, otherwise the external fabric of the building is proposed to be retained. To enlarge the roof enclosure, the existing roofing will be removed adjacent to the existing enclosure, existing steels will be cut back, and a new insulated single ply waterproofing membrane will be applied to the plant deck, the entire enclosure will be surrounded by louvred panels.

1.3.4. The design has sought to retain all the trees within the Application Site. In conjunction, the final Proposed Scheme will result in the removal of all introduced shrub within the Application Site, which subsequently means the removal of common snowberry, cherry laurel and *cotoneaster microphyllus* which are Invasive Non-Native Plant Species (INNPS) and readily outcompete native species, reducing the value of habitats for native species. This will be replaced with native mixed scrub planting which will provide nesting, refuge and foraging resources for local wildlife.

1.3.5. It is anticipated the construction period will last approximately 39 weeks. The proposed start date for the works is 17/04/2026.

1.4 Scope of Assessment

1.4.1. This report presents ecological information obtained during the following:

- A desk-study undertaken on 21/01/2025; and
- A walkover survey of accessible land within and adjacent to the Application Site undertaken on 22/01/2025.

2. Methodology

2.1 Zones of Influence

2.1.1. The project Zone of Influence (ZoI) is defined as the area over which ecological features may be affected by biophysical changes as a result of the proposed project and associated activities. The size and shape of the ZoI will depend on the ecological features present at the Application Site and the nature of the proposals and predicted impacts. The ZoI typically extends beyond the project boundaries (for example where there are ecological or hydrological links beyond Application Site boundaries), and takes into account both on-site impacts, and impacts that may occur to adjacent and/or more distant ecological features. In order to determine the ZoI, the size, location, and nature of a project needs to be considered alongside the likely impacts, sensitivities of ecological features, and potential for in combination effects.

2.1.2. For each ecological feature within the ZoI, the individual zone of sensitivity of that feature will vary depending on their susceptibility to an environmental change or effect. Where there is overlap between the project ZoI and the receptors zone of sensitivity, impacts may occur.

2.2 Desk Study and Consultation

2.2.1. The geographical area for obtaining ecological data through desk studies (hereafter referred to as the Desk Study Search Area) has been informed by the project ZoI and zones of sensitivity for ecological features using best practice guidance and professional judgement. Baseline data have been gathered from a range of sources through data requests and using online resources, as outlined below. This included data gathering in relation to statutory and non-statutory designated sites for nature conservation and protected and priority habitats and species (as defined by CIEEM[6]). The study areas used for the data gathering are detailed in Table 2-1.

2.2.2. The desk study was undertaken in January 2025. For species records collected, only those within 10 years of the data collection date have been considered within the assessment unless deemed relevant.

2.2.3. The following online resources were accessed:

- Multi-Agency Geographic Information for the Countryside (MAGIC) website[7]; and
- The Woodland Trust's Ancient Tree Inventory[8].

2.2.4. Ordnance Survey maps and Grid Reference Finder[9] were used to identify the presence of waterbodies within 500 m of the Application Site boundary, in order to establish if the land within and immediately surrounding the Application Site could be used as terrestrial habitat for great crested newt. This species

[6] As set out in Box 1 on page 4 of the CIEEM (2017) *Guidelines for Preliminary Ecological Appraisal, 2nd edition*. Chartered Institute of Ecology and Environmental Management, Winchester, priority habitats and species include those listed as a national priority for conservation (i.e. a Habitat of Principle Importance or Species of Principle Importance in England under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 (as amended); and/or local priority for conservation (e.g. in the local Biodiversity Action Plan (BAP)), International Union for the Conservation of Nature (IUCN) Red List or Amber List, Nationally Rare or Nationally Scarce, or endemic to a country or geographic location.
[7] Multi-Agency Geographic Information for the Countryside (MAGIC) [Online]. Available at: https://magic.defra.gov.uk/ [Accessed 21/01/2025].
[8] Woodland Trust *Ancient Tree Inventory* [Online]. Available at: https://ati.woodlandtrust.org.uk/ [Accessed 21/01/2025].
[9] UK Grid Reference Finder (2011) [Online]. Available at: https://gridreferencefinder.com/ [Accessed 21/01/2025].

typically uses suitable terrestrial habitat up to 500 m from a breeding pond[10]. However, there is a notable decrease in great crested newt abundance beyond a distance of 250 m from a breeding pond[11].

2.2.5. Thames Valley Environmental Records Centre (TVERC) were contacted on 17/01/2025 to request relevant desk study data, including details of non-statutory designated sites for nature conservation.

Table 2-1 - Desk study search areas

Date type	Search area – distance from Proposed Scheme boundary
Protected and priority species[6]	500 m (extended to 2 km for bats)
Statutory designated sites for nature conservation	1 km
Non-statutory designated sites for nature conservation	500 m
Irreplaceable habitats[12] and priority habitats[6]	500 m
Waterbodies	500 m
Ancient and Veteran trees	50 m

2.3 Planning Policy Review

2.3.1. A review of national and local planning policy relevant to the Proposed Scheme was undertaken as part of the data gathering. The following policy documents were subject to review:

- National Planning Policy Framework (2024)[13];
- Reading Borough Local Plan (2019)[14]; and
  - Reading Biodiversity Action Plan (2021)[15].

2.3.2. A summary of relevant planning policy and responses from consultees is provided in Appendix C.

2.4 Ecological Field Surveys

2.4.1. The geographical area for undertaking ecological field surveys has been determined using the current survey guidance, professional judgement, and the project ZoI, which have been determined based on the nature of the impacts arising from the Proposed Scheme.

[10] English Nature (2001) *Great Crested Newt Mitigation Guidelines*. English Nature, Peterborough.
[11] English Nature (2004). *An assessment of the efficiency of capture techniques and the value of different habitats for the great crested newt (ENRR576)* [Online]. Available at: http://publications.naturalengland.org.uk/publication/134002 [Accessed 21/01/2025].
[12] As defined within the NPPF (2024) *"Habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen."*
[13] Ministry of Housing, Communities and Local Government (2023) National Planning Policy Framework. Available at: https://www.gov.uk/government/publications/national-planning-policy-framework--2 [Accessed 21/01/2025].
[14] Reading Borough Local Plan (2019). Available at URL: Local_Plan_Adopted_November_2019.pdf [Accessed: 21/01/2025].
[15] Reading Biodiversity Action Plan (2021) Available at URL: Reading Biodiversity Action Plan [Accessed: 21/01/2025].

Surveyor Competencies

2.4.2. All the surveys were led by surveyors who have been assessed[16] to be at least of capable experience following the CIEEM competency framework[17]. The survey was led by a FISC level 4 ecologist assessed as at least 'capable' in line with the CIEEM and AtkinsRéalis competency framework.

Preliminary Ecological Walkover Survey

2.4.3. An ecological walkover survey of areas within and adjacent to the Application Site, including land up to 50 m from the Application Site boundary where access was allowed (hereafter referred to as the Survey Area), was undertaken on 22/01/2025. Habitats within the Survey Area were mapped and the walkover survey also included a search for evidence of the presence of, and the potential of each habitat to support, priority and protected species as recommended by CIEEM[18].

UKHab Survey

2.4.4. Habitats were mapped using the UK Habitat Classification (UKHab) v2.0 system[19]. UKHab is a comprehensive and hierarchical habitat classification system for the UK that has been developed to benefit from recent changes in habitat categorisation, recording and analysis, and is suitable for digitally recording in the field using GIS. It is fully compatible with other major existing classifications, including priority habitat types and Habitats Directive Annex I habitat types[20] .

2.4.5. All habitats were recorded to at least Level 3 of the UKHab hierarchy, i.e. broad habitats such as neutral grassland or dense scrub. Any Level 4 habitats and Level 5 habitats have also been recorded. In addition, 'Essential Secondary Codes' have been recorded to describe habitat mosaics, complexes and their origins. All habitat features have been digitally mapped, using QGIS, as either polygons, lines or points and assigned to a UKHab Primary Habitat Code.

2.4.6. An assessment of the possible presence of priority habitats (as defined by CIEEM[6]) was also undertaken during the walkover survey.

2.4.7. Vascular plant names recorded during this survey follow Stace[21].A botanical species list, with abundances, for the Application Site is available within the botanical survey results in Appendix F.

2.4.8. Target notes (TNs) were used to record specific details on the plant species composition of the habitats, current management, and quality. TNs were also used to record features of ecological importance (e.g. ponds, veteran trees, and complex habitat mosaics).

Protected and Priority Species Walkover

2.4.9. In addition to mapping the habitats within the Survey Area, the survey also included an assessment of the possible presence of protected or priority species. This included recording any incidental sightings

[16] Assessment undertaken by AtkinsRéalis' ecological technical leadership team in accordance with CIEEM competency criteria.
[17] CIEEM's Competency Framework. Available at: https://www.cieem.net/competency-framework [Accessed: 21/01/2025].
[18] CIEEM (2017) *Guidelines for Preliminary Ecological Appraisal, 2nd Edition*. Chartered Institute of Ecology and Environmental Management, Winchester.
[19] UKHab Ltd (2023). *UK Habitat Classification Version 2.0 (at https://ukhab.org)* [Accessed: 21/01/2025].
[20] Council Directive 92/43/EEC (1992) on the conservation of natural habitats and of wild fauna and flora (known as the 'Habitats Directive').
[21] Stace (2019) *New Flora of the British Isles* 4th edition.

or field signs from such species. The survey comprised assessing the suitability of the habitats present for, and recording any evidence of the following species (in line with current guidance):

- Amphibians (terrestrial and aquatic habitats);
- Badgers[22];
- Bats[23];
- Breeding birds[24];
- Hazel dormice[25];
- Otters[26,27];
- Priority invertebrates[28,29];
- Priority plants[30]
- Reptiles[31];
- Water voles[32];
- Hedgehog.

2.4.10. Evidence of the presence of invasive species was recorded where seen, including but not limited to the following:

2.4.11. Evidence of animal species as listed on the Invasive Alien Species (Enforcement and Permitting) Order 2019; muntjac deer and grey squirrel; and

2.4.12. Evidence of the presence of the following invasive non-native plant species (INNPS): Japanese knotweed, giant knotweed, hybrid knotweed[33], giant hogweed, Himalayan balsam, rhododendron[34], New Zealand pigmy weed, Virginia creeper[35], variegated yellow archangel, cotoneaster species[36], yellow azalea, few-flowered leak, montbretia, giant rhubarb, Japanese rose and three-cornered garlic. These are listed in Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) and/or the Invasive Alien Species (Enforcement and Permitting) Order 2019 and subject to strict legal control.

---

[22] Harris S., Cresswell P. and Jefferies D. (1989) *Surveying badgers*. Mammal Society – No9.
[23] Collins, J. (ed.) (2023) *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition).* The Bat Conservation Trust, London.
[24] Bird Survey & Assessment Steering Group. (2023). *Bird Survey Guidelines for assessing ecological impacts, v.1.1.1*. Available at: https://birdsurveyguidelines.org [Accessed: 21/01/2025].
[25] English Nature (2006). *The Dormouse Conservation Handbook* (2nd edition).
[26] Chanin and Smith (2003). *Monitoring the otter Lutra lutra*. Conserving Natura 2000 Rivers Monitoring Series No 10. Peterborough, English Nature.
[27] Liles G. (2003). *Otter Breeding Sites. Conservation and Management*. Conserving Natura 2000 Rivers Conservation Techniques Series No. 5. English Nature, Peterborough.
[28] Buglife, Good planning practice for invertebrates: Surveys. Available at: https://www.buglife.org.uk/resources/planning-hub/good-practice-planning-for-invertebrates/ [Accessed: 21/01/2025]
[29] English Nature, Organising surveys to determine site quality for invertebrates. Available at: https://publications.naturalengland.org.uk/publication/69045 [Accessed: 21/01/2025].
[30] Chapter 15 of Hill, D.A. ed., 2005. Handbook of biodiversity methods: survey, evaluation and monitoring. Cambridge University Press.
[31] Froglife (1999) *Reptile Survey: an introduction to planning, conducting and interpreting surveys for snake and lizard* conservation. Froglife advice sheet 10.
[32] Dean, M. et al (2016) *The Water Vole Mitigation Handbook*. Mammal Society.
[33] Hybrid knotweed species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) include *Fallopia japonica* x *Fallopia sachalinensis*
[34] Although there are approximately 1,200 species of rhododendron, just one species and one of its hybrids are listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended): *Rhododendron ponticum* and *Rhododendron ponticum x Rhododendron maximum*.
[35] Virginia creeper species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) include *Parthenocissus quinquefolia* and *Parthenocissus inserta*
[36] There are approximately 100 species of cotoneaster found in the UK, but only five are listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended): *Cotoneaster horizontalis*, *Cotoneaster integrifolius*, *Cotoneaster simonsii*, *Cotoneaster bullatus* and *Cotoneaster microphyllus*.

Further Ecological Surveys

2.4.13. Based on the results of the desk study and preliminary ecological walkover survey, further ecological surveys were undertaken to support this EcIA, as detailed in Table 2-2. Full methods are provided in Appendix B.

Table 2-2 - Further Ecological Surveys

Survey type	Study area – distance from the Proposed Scheme boundary	Rationale for study area	Dates of survey
Daytime Bat Walkover	30 m	Area based on best practice guidance[37]	22/01/2025
Ground Level Tree Assessment (GLTA)	30 m	Area based on best practice guidance[37]	22/01/2025
External Preliminary Roost Assessment (PRA) of structures	30 m	Area based on best practice guidance[37]	22/01/2025

2.4.14. Further surveys have not been undertaken for protected and notable species based on the results of the preliminary ecological walkover survey.

Survey Limitations

2.4.15. This section identifies any limitations to the surveys or assessment and provides an explanation as to the effect of these on the assessment.

2.4.16. Access was restricted in multiple areas of the Survey Area due to these areas being third-party land with no public access. These locations are highlighted on Figure E.1 in Appendix E. However, the majority of these areas could be viewed from the public accessibly land and the habitats were of low ecological value and easily classifiable, such as developed land, which will not be directly impacted by the Scheme. Some areas were not viewable (such as the area north of the Application Site), but given they will not be impacted by the Scheme and the small scale and extent of the Scheme, this is not considered to be a significant limitation

2.4.17. A UKHab walkover survey, although can be undertaken at any time of the year, is most optimal between April and October when the plant growth is the strongest. As the walkover survey was undertaken in January outside of the main survey season useful for flowering plant identification, some plant species may have not been identified during the walkover survey and as such, a full list of species could not be produced. However, given the nature of the habitats recorded on site, it is unlikely that any significant species would have been overlooked.

2.4.18. The tiles on the roof of the main building (B1 – Sovereign House) could not fully be seen, particularly on the southern side, but the tiles that were visible were all in very good condition with no lifted or broken tiles identified. This is not considered a limitation to the Preliminary Roost Assessment as only the northern side of the building will be impacted by the Proposed Scheme and the tiles were visible on the

[37] Collins, J. (ed.) (2023) *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition).* The Bat Conservation Trust, London.

northern side, with no Potential Roosting Features (PRFs) identified. The building loft was also fully accessible.

2.4.19. The search for waterbodies within 500 m of the Application Site was undertaken by using Ordnance Survey plans and aerial photographs only. These sources may not show all waterbodies within 500 m of the Application Site boundary and, therefore, some waterbodies may not have been identified.

2.4.20. The list of invasive plant species included on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) is extensive and these plants are found in a range of different habitats, including aquatic habitats. The UKHab extended walkover survey checked for the presence of Japanese knotweed, giant knotweed, hybrid knotweed, giant hogweed, Himalayan balsam, rhododendron, New Zealand pigmy weed, Virginia creeper, variegated yellow archangel, cotoneaster, yellow azalea, few-flowered leak, montbretia, giant rhubarb, Japanese rose and three-cornered garlic. Other invasive species listed in Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) may not have been recorded.

2.4.21. The desk study reviewed the Woodland Trust's Ancient Trees Inventory. This provides records of ancient/veteran trees, but is not an exhaustive list, and other ancient/veteran trees may be present in the area. The preliminary ecological walkover survey aimed to identify such features and as such this is not considered a constraint.

2.4.22. TVERC records are not exhaustive, and the absence of records does not necessarily demonstrate the absence of a species.

2.4.23. Many cryptic taxa particularly including apomictic species of plant, invertebrates and fungi, could not be adequately surveyed at the time of the survey. These groups require specialist survey and survey windows are generally highly restrictive, particularly for plants across the genera *Taraxacum*, *Rubus* and *Hieracium*. However, when taking into account the desk study results and the nature of the habitats present within the Site and in the surrounding landscape, this is not considered to be a significant limitation.

2.4.24. Ecological surveys are limited by factors which affect the presence of plants and animals such as the time of year, migration patterns and behaviour. Therefore, the ecological surveys undertaken to support this EcIA have not produced a complete list of plants and animals, and the absence of evidence of any particular species should not be taken as conclusive proof that the species is not present or that it will not be present in the future. The above limitation(s) has/have been addressed through taking the precautionary approach within the appraisal.

2.5 Identifying Important Ecological Features

2.5.1. A number of criteria have become accepted as a means of assessing the nature conservation importance of a feature which are set out in A Nature Conservation Review[38] and the CIEEM Guidelines for EcIA[4] and include diversity, rarity, and naturalness.

2.5.2. The nature conservation importance or potential importance of an ecological feature is determined within the following geographic context:

- International;
- National;

[38] Frazer J.F.D. (1977). A Nature Conservation Review, Edited by D. A. Ratcliffe. Cambridge University Press, Cambridge, England (on behalf of the Nature Conservancy Council and the Natural Environment Research Council): Vol. 1 s.

- Regional;
- Metropolitan, County, Vice-County or Other Local Authority-wide Area;
- Local;
- The Application Site and its immediate environs; and
- Negligible.

2.5.3. A number of resources have been used to determine importance and these are referenced, where relevant, within the baseline results.

2.5.4. This EcIA has undertaken a detailed assessment of ecological features considered to be 'important' (Important Ecological Features (IEF)). The baseline information and nature conservation evaluation have been used to identify IEFs. IEFs are sites, habitats, species, ecosystems and/or their functions/processes considered to be important and potentially affected by the project.

2.5.5. Features that have been identified to be of less than Local importance or features outside the Project ZoI are not considered to be IEF and have not been considered within the impact assessment. Where mitigation is required for these features for legal reasons, this is detailed in Section 5.

2.6 Impact Assessment

2.6.1. The assessment of the potential effects of the Proposed Scheme takes into account both on-site impacts, and impacts that may occur to adjacent and/or more distant ecological features.

2.6.2. Where impacts have been identified, details are provided within the assessment to characterise these in terms or their extent and magnitude, duration, frequency and timing, and reversibility. Both positive and negative impacts are discussed. Impacts were also characterised in terms of how they occur, i.e. direct, indirect secondary or cumulative. Impacts can be permanent or temporary and can include:

- Direct loss and degradation of wildlife habitats;
- Fragmentation and isolation of habitats;
- Mortality and injury to species;
- Disturbance to species from noise, light or other visual stimuli;
- Changes to key habitat features; and
- Changes to the local hydrology, water quality and/or air quality.

2.6.3. For designated sites for nature conservation, effects are considered significant when a Proposed Scheme and associated activities is likely to either undermine or support the conservation objectives or condition of the site(s) and its features of interest.

2.6.4. For habitats, effects are considered significant when a Proposed Scheme and associated activities is likely to result in a change in habitat structure and function.

2.6.5. Consideration is given to whether:

- Any processes or key characteristics will be removed or changed;
- There will be an effect on the nature, extent, structure and function of component habitats;
- There is an effect on the average population size and viability of component species; and
- Functions and processes acting outside the formal boundary of a designated site have also been considered, particularly where a site falls within a wider ecosystem e.g. wetland sites.

2.6.6. Some habitats can tolerate a degree of minor changes, such as localised or temporary disturbance or changes in physical conditions, without such changes harming their function or importance. For this EcIA, ecological effects have been considered in the light of any information available about the capacity of habitat to accommodate change. Significant effects have been determined as being either negative or positive.

2.6.7. The conservation importance of undesignated habitats and species within a defined geographical area (International to Local) has been used in this assessment to determine whether the effects of the proposals are likely to be significant:

- For habitats, conservation status is determined by the sum of the influences acting on the habitat that may affect its extent, structure and functions as well as its distribution and its typical species within a given geographical area; and,
- For species, conservation status is determined by the sum of influences acting on the species concerned that may affect its abundance and distribution within a given geographical area.

2.6.8. When assessing potential effects on nature conservation importance, the known or likely background trends and variations in status have been taken into account. The level of ecological resilience or likely level of ecological conditions, that would allow the population of a species or area of habitat to continue to exist at a given level or continue to increase along an existing trend or reduce a decreasing trend, has been estimated where appropriate to do so.

2.6.9. The avoidance, mitigation, compensation and/or enhancement measures described within the EcIA have been incorporated into the design and operational phasing programme and taken into account in the assessment of the significance of effects. These mitigation measures include those required to achieve the minimum standard of established good practice together with additional measures to further reduce any negative impacts of the Proposed Scheme. The mitigation measures include those required to reduce or avoid the risk of committing legal offences.

2.6.10. If the design changes or the agreed mitigation cannot be implemented, the effects will need to be reassessed, and further surveys may be required. In this event, the conclusion of this EcIA may no longer be valid.

2.6.11. In addition to measures required to ameliorate negative effects on IEFs, further biodiversity enhancement measures have been identified and will be incorporated into the Proposed Scheme as it is progressed.

2.7 Mitigation Hierarchy

2.7.1. The principles of the mitigation hierarchy[4] have been adopted and used when considering impacts and subsequent effects on IEF within the ZoI.

2.7.2. The mitigation hierarchy consists of the following sequential steps:

- Avoidance: Seek options that avoid harm to ecological features (for example, by locating on an alternative site);
- Mitigation: Negative effects should be avoided or minimised through mitigation measures, either through the design of the project or subsequent measures that can be guaranteed – for example, through a condition or planning obligation; and
- Compensation: Where there are significant residual negative ecological effects despite the mitigation proposed, these should be offset by appropriate compensatory measures.

2.7.3. Additionally, projects should seek to provide enhancements which are net benefits for biodiversity over and above the requirements for avoidance, mitigation or compensation.

3. Baseline Conditions and Importance

3.1 Overview

3.1.1. This section provides details of the ecological baseline relevant to the Proposed Scheme recorded during the desk study and field surveys undertaken to inform this EcIA.

3.1.2. Relevant legislation relating to protected sites, habitats, and species is provided in Appendix XX.

3.2 Statutory and Non-statutory Designated Sites

3.2.1. No statutory designated sites are found within 1 km of the Application Site or are hydrologically connected to the Application Site; therefore, they are not considered to pose a constraint to the Proposed Scheme and will not be considered further within this report.

3.2.2. No non-statutory designated sites are found within 500 m of the Application Site or are hydrologically connected to the Application Site; therefore, they are not considered to pose a constraint to the Proposed Scheme and will not be considered further within this report.

3.2.3. The Impact Risk Zones for Sites of Special Scientific Interest (SSSI IRZs) in the site location indicate that the proposed development is unlikely to have a harmful effect on terrestrial Sites of Special Scientific Interest (SSSIs) and the Special Areas of Conservation (SACs), Special Protection Areas (SPAs) or Ramsar sites that they underpin. Therefore, Natural England do not need to be consulted on the likely impacts of development on terrestrial SSSIs and the SACs, SPAs or Ramsar sites that they underpin.

3.3 Irreplaceable Habitats

3.3.1. No irreplaceable habitats are found within 500 m of the Application Site and therefore are not considered to be a constraint to the Proposed Scheme and will not be considered further within this report.

3.3.2. No ancient or veteran trees are located within 50 m of the Application Site and therefore are not considered to be a constraint to the Proposed Scheme and will not be considered further within this report.

3.4 Habitats

Priority Habitats

3.4.1. No priority habitats were recorded within the Application Site during the survey.

3.4.2. A review of MAGIC identified eight parcels of deciduous woodland within 500 m of the Application Site as shown in Figure D.1, with the closest parcel located approximately 260 m northeast of the Application Site.

3.4.3. No priority habitats are hydrologically connected to the Application Site and considering the small scale and localised nature of the Proposed Scheme, it is considered unlikely that priority habitats will be

affected by any potential air/water pollution or dust impacts from the Proposed Scheme. As such, priority habitats are scoped out from further assessment within this report.

Application Site and Immediate Surroundings

3.4.4. Habitats within the Survey Area are mapped on the UKHab survey plan (shown on Figure E.1) with specific features highlighted by TNs on the figure. TN descriptions and photographs are provided in Appendix E.

3.4.5. The Application Site consists of Sovereign House, associated parking north of the building and ornamental planting (introduced shrub) throughout the Application Site. There are also two small brick outbuildings north of the main building and an access track leading northeast towards the River Thames which is just outside of the Application Site boundary. Within the Application Site boundary, habitats consist of developed land, sealed surface (u1b), three buildings (u1b5), (u1 – built-up areas and gardens, secondary code 847 - introduced shrub) and multiple scattered individual urban trees.

3.4.6. The Site is located in a primarily urban environment, with Reading railway station and the Main Western rail line to the south, residential and business units to the west, business units to the east and the River Thames to the north. In the wider surroundings, Christchurch meadows are located north of the River Thames and Kings meadow is located east of the Site, with a rowing lake further east.

3.4.7. Table 3-1 lists all of the UKHab Level 3 habitats present within the Survey Area and identifies those Level 4 and Level 5 habitats which are protected and/or listed as priority habitats. The table also provides details of the area of each habitat within the Survey Area and the proportion of the Application Site this makes up.

Table 3-1 - Habitat types within the Survey Area

UKHab habitat category	Location of habitat	Area of habitat Ha	Annex 1 habitat Yes/No	Priority habitat Yes/No	Secondary codes[39]	Importance level	Rationale for valuation
Developed land; sealed surface (u1b)	Majority of the Application Site, including a car park, surroundings of the buildings, a road and an access track (footpath) northeast up to the River Thames.	0.18 ha	No	No	800 – road 804 – car park	Negligible	No suitable ecological features and no conservation significance.
Buildings (u1b5)	Three buildings (Sovereign House and two small outbuildings) within the Application Site.	0.08 ha	No	No	815 – commercial building	Local	May provide suitable features for protected and notable species.

[39] Secondary codes allow the recording of additional information, linked to the Primary Habitats (for example, scattered scrub can be linked with primary habitats such as grassland and heathland).

Built up areas and gardens (u1, 847 – introduced shrub)	Multiple areas around the Application Site.	0.07 ha	No	No	524 – invasive non-native species 847 – introduced shrub	Application Site	Common habitat of minimal conservation significance.

3.4.8. The habitats located within the Application Site are common, widespread and are of limited ecological value. The only habitat to be lost during the works is introduced shrub. The loss of this habitats will be accounted for in the Biodiversity Net Gain Assessment for the Application Site.

3.4.9. Features that have been identified to be of less than local importance are not considered to be important ecological features. Therefore, the following habitats have not been considered within the impact assessment:

- Developed land; sealed surface (u1b);
- Buildings (u1b5); and,
- Built up areas and gardens (u1, secondary code 847 – introduced scrub).

3.5 Protected and Priority Species

3.5.1. This section provides a summary of the results of the desk study, UKHab extended walkover survey, and the further surveys, along with the nature conservation importance for each species or species group.

Amphibians

3.5.2. TVERC provided one recent[40] amphibian record within 500 m of the Application Site which was a great crested newt (GCN) located 450 m northeast of the Application Site from 2017, separated from the Application Site by the River Thames which forms a major dispersal barrier to GCN.

3.5.3. MAGIC provided no granted GCN European Protected Species (EPS) licence returns, or GCN class survey licence returns, within 500 m of the Application Site.

3.5.4. A review of Ordnance Survey maps and aerial images revealed there is one ditch and no ponds within 500 m of the Application Site boundary which could support breeding populations of amphibians, including GCN. The ditch is located approximately 320 m north of the Application Site boundary. The River Thames is located approximately 5 m north of the Application Site boundary, which forms a major dispersal barrier for GCN between the ditch and the Application Site.

3.5.5. The field survey on the 22/01/2025 identified the following evidence:

- *Breeding habitat:* No suitable breeding habitat for amphibians, including GCN, was recorded within the Survey Area. The only waterbody located within 500 m of the Application Site can be scoped out due to the River Thames forming a major dispersal barrier. The Application Site is surrounded by developed

[40] Only recent records within the last 10 years have been included within this report.

land, which is unsuitable for amphibians, to the west, south and east, and the River Thames to the north is unsuitable for amphibians, including GCN.

- *Terrestrial habitat:* Terrestrial habitat for amphibians, including GCN, was recorded within the Survey Area. This is limited to the introduced shrub which provides some foraging habitat for amphibians. However, the urban environment within and surrounding the Application Site is considered highly unsuitable for commuting and foraging amphibians, including GCN, and is isolated from any suitable habitat in the wider surroundings.

3.5.6. Due to the River Thames forming a major dispersal barrier to the only waterbody within 500 m of the Application Site, the lack of suitable breeding and terrestrial habitat within and surrounding the Application Site, and the lack of GCN records (only one was provided which was not connected to the Application Site), it is considered unlikely that GCN and common amphibians will occur within the Application Site and have therefore been scoped out from further assessment.

Badgers

3.5.7. TVERC provided three recent[40] badger records within 500 m of the Application Site which are all located east of the Application Site given to a same six figure grid reference (1km by 1km), with the closest location possible within this area located approximately 370 m east of the Site boundary. The records included two setts recorded in 2020 and one sett in 2019 and the grid reference area covers the Kings Meadow to the east of the Application Site, south of the River Thames.

3.5.8. The field survey on 22/01/2025 assessed the Survey Area for evidence of badgers (setts, latrines, feeding signs and mammal track) and potential habitats to support badgers. The field survey did not identify any evidence of badgers, and the habitats within the Application Site were not considered suitable for sett creation and provide limited opportunity for foraging and commuting badgers. There is suitable habitat for badgers in the wider surroundings, provided by the woodland and grassland to the east (Kings meadow), but these habitats are separated from the Application Site by a major road (the A329 leading north to the Reading Bridge) which will limit commuting and foraging badgers from accessing the Application Site.

3.5.9. Badgers are not a priority species in the UK. However, due to the legal protection afforded to badgers, mitigation measures have been provided in Section 5.

Bats

3.5.10. TVERC provided 866 recent[40] records of bats within 2 km of the Application Site, comprising unidentified bat species, pipistrelle bat species, common pipistrelle, soprano pipistrelle, Natterer's bat, Nathusius's pipistrelle, brown long-eared bat, Daubenton's bat, Leisler's bat, long-eared bat species, Myotis bat species, western barbastelle, noctule bat, serotine and whiskered bat. The closest record (a roost record) was of common pipistrelle located approximately 60 m west of the Application Site from 18/04/2019 to 10/10/2019.

3.5.11. MAGIC provided two records of granted bat EPS licence applications within 2 km of the Application Site. The closest of these EPS licences (2017-28045-EPS-MIT) was located approximately 220 m southeast of the Application Site for Daubenton's bat and did not allow the damage or destruction of a resting place or a breeding place, starting from 08/03/2017 and ending on 08/03/2022. The second EPS licence (EPSM2013-6155) was located approximately 400 m southeast of the Application Site for common pipistrelles and allowed the destruction of a resting place, starting on 19/09/2013 and ending on 31/08/2015.

3.5.12. The field survey on the 22/01/2025 identified the following evidence:

Roosting habitat:

3.5.13. Three buildings were recorded within the Application Site at the time of the survey. These are labelled B1, B2 and B3 and are shown on Figure E.1 in Appendix E.

3.5.14. B1 (Sovereign House) will be subject to direct impacts as a result of the Proposed Scheme, with the proposed extension on the north side to incorporate a lift into the main building. Externally, the soffits were in good condition and the tiles that were visible (see limitations in Section 2 above) were in very good condition with no obvious PRFs. Six channels were present in the brickwork (PRF 2 shown in Table E-2) that could lead up into the soffit board allowing access into the soffit interiors. There were also a couple of thin gaps between the soffit board and the brickwork identified on the southern side of the building (PRF 1). Internally, the building was used as an office space but has now been closed down. There is a loft located on the third floor which is a modern, well-sealed and well insulated loft space which was used partly as an office for security staff. The loft is accessible by a staircase on the western side or a fixed ladder on the eastern side. The roof had wooden beams and insulation was in good condition. The only apparent gaps into the loft space identified were scattered along the gables along the northern and southern sides of the building, or where pipes enter the building. No evidence of bats was found (droppings, scratches or staining anywhere around any potential access points). Due to being used as an office, the loft is likely well-lit most of the time and there was constant noise disturbance from the pipework throughout the loft and no bat droppings found in any other areas of the loft. Opportunities for crevice-dwelling bats within the loft space is very limited. The building was considered to have low potential for individual common or soprano pipistrelles that could utilise the PRFs that lead up behind the soffit boards. However, the loft is not considered suitable for rarer bat species such as Daubenton's or brown-long eared bats.

3.5.15. B2 is a small brick outbuilding located north of B1 and was not accessible internally during the survey. It has a tiled, pitched roof and a door with metal slats. No obvious PRFs were identified and there were no visible access points into the soffit boards. It is considered to have negligible potential for roosting bats in line with current guidelines and therefore does not require further consideration for roosting bats.

3.5.16. B3 is also a small brick outbuilding located adjacent east of B2 and is currently used as a bin store. This also has a door with metal slats but has a flat, felt roof. No obvious PRFs were identified externally, and internally no evidence of bats was found (no droppings). The building was considered to have low potential for roosting bats due to the door allowing access; however, as there will be no impact to the building, it was fully inspected during the survey and there was no evidence of bats using the building, no further surveys are required.

3.5.17. A GLTA was carried out on the trees within the Bat Survey Area. None of the individual trees within the Application Site were mature or supporting any PRFs. The white poplar line of trees (L1 shown on Figure E-1) north of the Application Site were viewed from the road therefore could not be accessed fully for PRFs, but no notable PRFs were recorded, and these trees are outside of the Application Site and therefore won't be impacted by the Proposed Scheme. The trees within the line of trees L2 were all semi mature and did not support any PRFs.

Commuting and foraging habitat:

3.5.18. The habitats within the Application Site were considered to be of some limited value to foraging and commuting bats. The scattered trees and introduced scrub were considered to provide some suitable foraging habitat, but the shrub habitat was not considered to be dense. The line of trees and River Thames within the Survey Area offer commuting and foraging habitat and provide connectivity between the Application Site and the large fields and woodland located north of the river. The Application Site is therefore considered to be of moderate value for foraging and commuting bats in line with current guidance.

3.5.19. Roosting, foraging and commuting bats are considered to be important at the Local level due to the limited extent of suitable roosting, foraging and commuting habitat. Therefore, this species may pose a constraint to the Proposed Scheme. Bats are considered in further detail in Section 5 of the impact assessment.

Breeding Birds

3.5.20. TVERC provided 1,129 recent[40] priority[41] bird records within 500 m of the Application Site, comprising of 49 species. The closest record was of a peregrine approximately 10 m north of the Application Site in 2015 (in the line of trees within the Survey Area).

3.5.21. Of the 49 species recorded, common scoter, fieldfare, greenfinch, herring gull, house martin, house sparrow, lapwing, linnet, redpoll, mistle thrush, skylark and swift, are included on the Birds of Conservation Concern 5[42] (BoCC5) red list. In addition, black redstart, black-headed gull, common tern, dunnock, gadwall, great white egret, grey wagtail, mallard, meadow pipit, moorhen, reed bunting, rook, sedge warbler, shelduck, song thrush, sparrowhawk, stock dove, tawny owl, teal, white-tailed eagle, willow warbler, woodpigeon and wren are included on the BoCC5 amber list.

3.5.22. Of these 49 species, brambling, bullfinch, common gull, kestrel, kingfisher, peregrine, red kite and redwing are listed under Schedule 1 Part 1 of the Wildlife and Countryside Act 1981 (as amended)[43].

3.5.23. The field survey on 22/01/2025 identified evidence of suitable habitat for more common species of breeding birds within the Application Site. The scattered trees and introduced shrub within the Application Site could provide suitable habitat for breeding birds.

3.5.24. Breeding birds are considered to be important at the Application Site level based on the limited extent of potential habitat (trees and introduced shrub). Therefore, breeding birds have been scoped out of further assessment. However, due to the legal protection afforded to wild birds, mitigation has been included in Section 5 to comply with relevant legislation.

Hazel Dormice

3.5.25. TVERC provided no recent[40] hazel dormouse records within 500 km of the Application Site. MAGIC provided no records of granted hazel dormice EPS licence applications within 500 m of the Application Site.

3.5.26. The field survey on 22/01/2025 identified no suitable habitat within or surrounding the Application Site. The introduced shrub was scattered and all mostly non-native, so is not considered to provide suitable food sources for dormice and there is no connectivity between shrub on site or to any suitable habitat in the wider surroundings. Although suitable habitat may be present within the woodland areas to the east of the site around the Kings meadows, there is no connectivity between these habitats and the Application Site.

3.5.27. The habitats within the Application Site were considered to be sub-optimal for hazel dormouse and of very limited extent. As such, based on the limited habitat suitability and likely absence of hazel dormouse within the Application Site, this species is scoped out of further assessment.

---

[41] As set out in the Bird Survey Guidelines for assessing ecological impacts, v.0.1.7. https://birdsurveyguidelines.org [Accessed: 21/01/2025]
[42] Available online at Birds of Conservation Concern | BTO - British Trust for Ornithology [Accessed: 21/01/2025].
[43] Available online at Wildlife and Countryside Act 1981 (legislation.gov.uk) [Accessed: 21/01/2025].

Otters

3.5.28. TVERC provided three recent[40] otter records within X km of the Application Site, with the closest record located approximately 60 m northwest of the Application Site in 2023. MAGIC provided no records of granted EPS licences applications for otter within 500 m of the Application Site.

3.5.29. The field survey on the 22/01/2025 identified no evidence of otters or suitable habitat for holt creation, resting, foraging or commuting otters within or surrounding the Application Site. The River Thames is located within the north of the Survey Area and is known to support commuting and foraging otters (two of the three records of otters were located within the River Thames). However, the entire length of the bank is engineered with steep sides and is lit by streetlamps, making the likelihood for otters to commute into the Application Site low. Therefore, it is considered unlikely that these species are present within the Application Site and are scoped out from further assessment. However, due to the legal protection afforded to otters, mitigation has been included in Section 5 to comply with relevant legislation.

Priority Invertebrates

3.5.30. TVERC provided 22 recent[40] records of priority invertebrates within 500 km of the Application Site which were all stag beetle records. The closest record was located approximately 10 m north of the Application Site in 2023, within the line of white poplar trees (L1).

3.5.31. The field survey on 22/01/2025 identified limited suitable habitat for priority invertebrates within the Application Site, provided by the introduced shrub and scattered trees. No significant dead wood was recorded within the scattered trees at the time of the survey, with the shrub areas consisting of mostly non-native species and are isolated from any suitable habitats surrounding the Application Site. The line of trees north of the Application Site had minimal ground cover, but the record of the stag beetle was located within this line of trees therefore indicating that the condition of the vegetation present may provide suitability for supporting stag beetle. An insect hotel was also identified within the Application Site (TN 5). No aquatic habitats were present within the Application Site, with habitats immediately adjacent to the Application Site comprising developed land (major roads, residential buildings and business developments).

3.5.32. The Application Site is considered unlikely to provide habitat for significant assemblages of invertebrates and therefore priority invertebrates are scoped out from further assessment, except for stag beetles. Due to the conservation status of stag beetle, and records for this species in the area, mitigation to prevent harm to this species, in the event they are present, is outlined in Section 5.

Priority Plants

3.5.33. TVERC provided three recent[40] priority plant records within 500 m of the Site, including the species chicory, English whitebeam and ragged-robin. None of these species are listed as UK BAP priority species (i.e. plant species of principal importance in England). The closest record was of an English whitebeam located 80 m northeast of the Application Site.

3.5.34. The field survey on the 22/01/2025 identified no priority plants within the Survey Area and no suitable habitat for priority plants. The habitats within the Application Site are not considered suitable for supporting priority plants as the majority of the Application Site is comprised of developed land, with a few scattered trees and introduced shrub patches consisting of mainly non-native plant species. Due to the Application Site having limited connectivity to any habitats with suitability to support priority plants, the likelihood for priority plants to spread into the Application Site is negligible. Therefore, priority plants

are not considered to pose a constraint to the Proposed Scheme and have been scoped out from further assessment.

Reptile Species

3.5.35. TVERC provided no recent[40] reptile records within 500 m of the Application Site. MAGIC provided no records of granted rare reptile EPS licence applications within 500 m of the Application Site.

3.5.36. The field survey on the 22/01/2025 identified no priority plants within the Survey Area and no suitable habitat for priority plants. The habitats within the Application Site are not considered suitable for supporting priority plants as the majority of the Application Site is comprised of developed land, with a few scattered trees and introduced shrub patches consisting of mainly non-native plant species. Due to the Application Site having limited connectivity to any habitats with suitability to support priority plants, the likelihood for priority plants to spread into the Application Site is negligible. Therefore, priority plants are not considered to pose a constraint to the Proposed Scheme and have been scoped out from further assessment.

Water Voles

3.5.37. TVERC provided no recent[40] water vole records within 500 km of the Application Site.

3.5.38. The field survey on the 22/01/2025 identified no suitable habitat for water vole within the Application Site. Although there is a watercourse, the River Thames, within the Survey Area, no evidence of water vole was identified, and the watercourse is not connected to the Application Site. The river is channelised and considered too large to be suitable for water vole. The engineered banks with a lack of vegetation further adds to the River Thames being unsuitable for water vole. Therefore, it is considered unlikely that this species is present within the Application Sit or zone of influence of the scheme with respect to water voles, and therefore water vole are scoped out from further assessment.

Hedgehog

3.5.39. TVERC provided five recent[40] western European hedgehog records within 500 m of the Application Site, the closest of which being located 220 m northwest of the Application Site in 2023.

3.5.40. No evidence of hedgehogs was recorded during the survey although a hedgehog box was identified within the Application Site (TN 6). The introduced scrub provides some suitable habitats for foraging hedgehogs. There is suitable habitat for hedgehog in the wider surroundings to the east provided by the woodland and grassland at Kings Meadows, although there is limited connectivity to this Site due to the major road and heavily urban environment comprising of commercial buildings and associated land. Whilst some suitable habitat for this species occurs within the Application Site, the habitat is limited in size and therefore hedgehogs are considered to be important at the Application Site level only and are scoped out from further assessment of impacts. Due to national declines in hedgehog populations, mitigation to prevent accidental harm or injury during construction has been included in Section 5.

3.6 Summary of Important Ecological Features

3.6.1. The following features have been valued at less that Local importance for nature conservation and are not considered to be important ecological features within the context of this assessment. These features have been scoped out of detail impact assessment. Where mitigation is required for legal reasons, this is detailed in Section 5.

- Badgers;
- Breeding birds;
- Otters;
- Priority invertebrates; and
- Hedgehog.

3.6.2. In addition, the following features have also been scoped out of the impact assessment, the rational for which is discussed in the Baseline section above (Section 3):

- Statutory designated sites for nature conservation;
- Non-statutory designated sites for nature conservation;
- Irreplaceable habitats;
- Ancient / Veteran trees;
- Priority habitats;
- Priority plants;
- Amphibians, including great crested newt;
- Widespread species of reptiles;
- Water vole; and
- Hazel dormouse.

3.6.3. Table 3-2 below provides a summary of the IEFs which are considered to fall within the Proposed Scheme's ZoI and scoped into the impact assessment. Full details in relation to the determination of importance are provided within the Baseline section above.

Table 3-2 - Summary of Important Ecological Features

Ecological Feature	Summary of baseline	Importance level
Bats	Low potential building that will be impacted by the proposed works. Suitable foraging and commuting habitat around the site.	Local

3.7 Invasive Non-native Plant Species

3.7.1. TVERC provided six recent[40] invasive non-native species records within 500 m of the Application Site. The species recorded were butterfly bush (buddleia)[44], Japanese knotweed, Himalayan balsam and Nuttall's waterweed. The closest record of butterfly bush is located 80 m northwest from the Application Site, from 2018.

3.7.2. The field survey identified four invasive non-native plant species as set out in Table 3-3. Furthermore, due to the nature of invasive non-native plant species, there is a possibility that further species may encroach onto the Application Site from the wider landscape in the time between the Application Site survey and the start of construction works.

Table 3-3 - Invasive non-native species

[44] Although butterfly bush, common snowberry and cherry laurel are not listed under Schedule 9 of the Wildlife and Countryside Act 1981, these species are considered to be invasive species.

Invasive non-native species	Extent of cover	Location
Common snowberry[44]	Found throughout the introduced shrub areas surrounding Sovereign House.	Within introduced shrub areas shown on Figure E-1.
Cherry laurel[44]	Found within the introduced shrub area at the front of Sovereign House.	Within introduced shrub areas shown Figure E-1.
Cotoneaster microphyllus	Found within the introduced shrub area at the front of Sovereign House.	Within introduced shrub areas shown on Figure E-1.
Butterfly bush	Found just outside of the western boundary of the Application Site but is hanging over the brick wall into the Site.	TN 1 (SU 71570 74055)

3.7.3. The invasive non-native plants recorded in the Application Site are not considered important ecological features and therefore have been scoped out for further assessment. However, the species of cotoneaster present is listed under Schedule 9 of the Wildlife and Countryside Act (1981) meaning it would constitute an offence where these species were caused to spread or otherwise grow in the wild. In conjunction, butterfly bush readily outcompetes native flora and can cause damage to hardstanding features through the creation and exploitation of cracks. Snowberry and cherry laurel also outcompete native flora. In order to comply with the relevant legislation and prevent the spread of invasive non-native plants, mitigation has been outlined in Section 5.

4. Potential Impacts

4.1.1. The Proposed Scheme has potential to result in a number of impacts which are broadly summarised below.

4.1 Construction Impacts

- Temporary habitat loss (e.g. land used during construction that is subsequently to be restored);
- Habitat degradation (e.g. through sediment release, pollution events, and dust);
- Injury or mortality of protected and priority species; and
- Disturbance including noise and vibration to protected and priority species.

4.2 Operational Impacts

- Permanent habitat loss of potential roosting sites within building 1.

5. Design Features and Mitigation Measures

5.1 Overview

5.1.1. This section details the features that have been incorporated into the design which are of benefit to biodiversity and the mitigation measures which will be implemented during the construction and operational phase/s to reduce ecological impacts. In developing the mitigation, the mitigation hierarchy has been followed, looking to avoid in the first instance followed by mitigation and compensation.

5.1.2. Features that have been valued at less than Local importance for nature conservation are not considered to be IEFs and as such, have not been considered within the impact assessment. However, if mitigation is required for these features for legal reasons it is detailed within this section.

5.1.3. The Application Site and its immediate surroundings are of limited biodiversity importance. Whilst the features recorded have not been assessed as IEFs, they are considered to provide a biodiversity benefit for the immediate locale. These features do not fall into the criteria of requiring detailed impact assessment. However, their presence has been considered within the context of the Application Site and the design has considered these features in terms of achieving no net biodiversity loss and, where possible, net gain. Net gain can be provided on-site through the creation of mixed scrub to replace the introduced shrub within the Application Site (further details provided in the separate BNG report[5]).

5.1.4. A Construction and Environmental Management Plan (CEMP) will be produced which will detail the ecological mitigation and enhancements outlined below within the Application Site. The CEMP will be delivered as part of the construction and operational phases of the Proposed Scheme.

5.1.5. An Ecological Management and Monitoring Plan (EcMMP) will be produced which will detail the ecological mitigation and enhancements detailed below within the Application Site. The EcMMP will be delivered as part of the construction phase of the Proposed Scheme and will be incorporated into the Contractor's CEMP and/or relevant Method Statements.

5.1.6. The EcMMP, which will be secured by planning condition, will be produced following determination of the application and in advance of any construction work commencing on Site. It will detail all of the ecological mitigation and enhancements within the Application Site that will be delivered as part of the construction and operational phases of the Proposed Scheme.

5.1.7. The EcMMP will include mitigation measures for highlighted species, retention and creation of habitats, and opportunities for biodiversity enhancement. It will detail the planting of landscape areas and will include lists of species to be used and how the habitats should be managed to enhance and maintain their nature conservation value long-term.

5.2 Design Features

5.2.1. The following measures have been incorporated into the Proposed Scheme design:

- Scheme has been revised to retain all trees with no pruning or crown lifting proposed;
- Native mixed scrub planting will be undertaken at the Application Site to replace all remaining areas of introduced shrub in the Proposed Scheme;

- A sensitive lighting plan for the Application Site will be designed and will be implemented to reduce negative impacts to foraging and commuting bats and other nocturnal fauna;
- Bat and bird boxes will be installed on retained trees;
- A log pile will be created within the scrub area to provide suitable habitat for priority invertebrates, such as stag beetle.

5.3 Mitigation Measures

General

5.3.1. The following general measures will be implemented during the construction phase of the Proposed Scheme:

- Works will adhere to the Guidance for Pollution Prevention (GPPs)[45] and Construction Industry Research and Information Association (CIRIA) C762 Environmental good practice[46];
- During construction trees will be protected in line with guidelines provided in BS 5837 Trees in relation to Construction[47]; and
- Where possible, tree felling and vegetation clearance will be minimised and undertaken outside the core bird nesting season (the core bird nesting season is 1 March to 31 August, though it should be noted that variation in dates is possible, for example from geographical variations in climate, or due to a particularly mild winter) to avoid damage or destruction of occupied nests or harm to breeding birds. If this cannot be achieved, works within the core bird nesting season will require an inspection of vegetation to be cleared for breeding birds and their occupied nests by a suitably qualified ecologist no more than 24 hours prior to any works being undertaken. If any nesting birds are identified during the survey a suitable exclusion zone where no works can be undertaken will be erected in line with the standoff zone for the species present. No works within the stand-off zone can be undertaken until all chicks have fledged and this has been confirmed by a Suitably Qualified Ecologist (SQE).
- Prior to the commencement of works, a pre-construction check should be carried out on the Application Site by an ecologist to check for any additional ecological constraints which were not identified during the surveys, such as new badger setts. In the case of any additional ecological constraints being identified at this stage, works should stop, and advice should be sought from a specialist ecologist for that particular species.
- It is recommended that as a minimum any works undertaken that could impact directly on, or impact habitats supporting badger and hedgehogs are completed in accordance with a Precautionary Method of Works (PMW). The PMW will detail the rationale as to why protected species licences are not required and the methodology that will further decrease the likelihood of an offence being committed, including those described below (e.g., sensitive timing of works, locations of ecological watching brief of phased vegetation clearance and hand searches, etc.). A suitably qualified Ecological Clerk of Works (ECoW) should be present to carry out the pre-works checks and provide advice during the works. All Site workers should attend a Toolbox Talk by the ECoW ahead of the works commencing.
- Any excavations should be filled or covered overnight to prevent animals becoming entrapped or injured. Where pits and trenches cannot be closed or filled on a nightly basis, a plank of wood (or similar ramp) should be placed into the excavation at an angle that allows a means of escape.

---

[45] The GPPs provide environmental good practice guidance for the whole UK, and environmental regulatory guidance directly to Northern Ireland, Scotland and Wales only. For businesses in England, regulatory guidance is available from GOV.UK instead.
[46] CIRIA C762 Environmental good practice provides advice on the management of a range of environmental issues that may be encountered on site and presents good practice to reduce the environmental impacts due to construction.
[47] British Standards Institute (2012) BS 5837:2012 Trees in relation to design, demolition, construction.

- Night-time working should be avoided to ensure temporary increases in lighting do not disturb nocturnal species. If night-time working or night-time security lighting is required, lighting should be directional and downward facing to illuminate the temporary works area and avoid light spillage into adjoining habitats. Additional design information in relation to bats and artificial lighting is provided in the Bat Conservation Trust lighting guidelines.
- Any proposed permanent lighting design should be subject to agreement with an ecologist before it is finalised and prior to any associated site work being carried out. Lighting columns will be fitted with shields to help prevent backwards light spill on to features suitable for use by foraging and commuting bats.
- Plant and material should be stored on areas of hardstanding or bare ground, and anything left on site overnight should be carefully checked by hand the following morning before being moved for small mammals which may take refuge under plant and materials.
- A Biodiversity Net Gain assessment has been undertaken for the Application Site following the principles of the biodiversity gain hierarchy and outlining methods to achieve a net gain for the development. Achieving a 10% net gain is considered achievable within the confines of the Application Site through the creation of mixed scrub, and therefore off-site compensation or monetary contribution will not be required.
- A Habitat Management and Monitoring Plan (HMMP) will be produced for the site and will detail the methods for habitat creation, management and monitoring. This will be implemented during and post construction to ensure success of created habitats.

Specific Mitigation Measures

Bats

Roosting

5.3.2. The main building (Sovereign House) is considered low potential suitability to support roosting pipistrelle bat species due to the presence of PRFs and will be subject to a bat emergence survey in June 2025 to confirm if any bats are roosting in the building. The building, including the northern side of the roof, will be subject to direct impacts as a result of the Proposed Scheme. Depending on the results of this survey, a licence may be required before any proposed works can commence.

5.3.3. Construction will also be undertaken under a PMW for bats to reduce indirect impacts through noise, vibration and lighting. The PMW will outline suitable timings and methods for the works and protocols should bats be encountered at any stage of the works.

5.3.4. In the unlikely event of roosting bats (or evidence of their presence) being found during the works, all work will immediately stop, and the advice of a suitably qualified bat licensed ecologist will be obtained. In this event it is likely that all works will need to stop until a Natural England mitigation licence is in place.

5.3.5. It is advised that the works to the buildings are undertaken between September and October or March to April where possible, to avoid the more sensitive periods for bats (hibernation period is between November to March inclusive (temperature dependent) and the maternity period is May to August inclusive). If works must take place during the hibernation period, the months of January and February are the most sensitive and should be avoided preferentially over November and December.

5.3.6. The building where PRFs were recorded should not be subject to increased lighting during the construction or operational phase of the development in order to prevent entombment or abandonment of a roost should bats be present.

5.3.7. The lighting scheme for the Application Site will be produced in consultation with an ecologist to reduce impacts from lightning on retained trees as far as practicable within the confines of the scheme.

5.3.8. Currently, no works to trees including removal, crown lifts or pruning are proposed as part of the Proposed Scheme. Where this changes, and impacts are considered necessary, a GLTA should be undertaken in conjunction with the nesting bird checks outlined above, or prior to felling where works avoid the nesting bird season. As part of the assessment, a route through the vegetation will be created using hand tools to allow the surveyor to fully assess the trees. Where roosting features are identified, further survey work and an EPS License may be required.

5.3.9. Three bat boxes will be installed at the Application Site to increase the roosting resource. Bat boxes should be made from woodcrete© or similar materials to ensure longevity and should be placed on suitable retained trees. Boxes should not be positioned on trees susceptible to disease such as ash, with the location decided by an ecologist with reference to the final lighting scheme and arboricultural assessment for the Application Site. Where trees are assessed as having no features suitable for roosting bats, the provision of bat boxes will provide an enhancement for the scheme.

Commuting and foraging habitat

5.3.10. No night-time working (taken to be 30 minutes before sunset until 30 minutes after sunrise) will be undertaken to ensure temporary increases in lighting do not disturb wildlife, particularly foraging and commuting bats. Where night-time lighting is required, lighting will be directional and downward facing to illuminate the temporary works area and avoid light spillage into adjoining habitats. Additional design information in relation to bats and artificial lighting is provided in the Bat Conservation Trust lighting guidelines. Any proposed lighting design should be subject to agreement with an ecologist before it is finalised and prior to any associated work being carried out.

5.3.11. The lighting scheme for the Application Site will be produced in consultation with an ecologist to reduce impacts from lightning on retained trees and the building as far as practicable within the confines of the scheme.

Breeding Birds

5.3.12. Where possible, vegetation clearance will be undertaken outside the core bird nesting season (the core bird nesting season is 1 March to 31 August, though it should be noted that variation in dates is possible, for example from geographical variations in climate, or due to a particularly mild winter) to avoid damage or destruction of occupied nests or harm to breeding birds. If this cannot be achieved, works within the core bird nesting season will require an inspection of vegetation to be cleared for breeding birds and their occupied nests by a suitably qualified ecologist no more than 24 hours prior to any works being undertaken. If any nesting birds are identified during the survey, a suitable exclusion zone where no works can be undertaken will be erected in line with the standoff zone for the species present. No works within the stand-off zone can be undertaken until all chicks have fledged and this has been confirmed by a suitably qualified ecologist.

5.3.13. Bird boxes targeting common garden species should be installed on retained trees around the Application Site. Four nest boxes suitable for species tolerant of overlapping territories should be provided. Boxes chosen should include exclusion designs to prevent non target species occupying the nest boxes. Existing bird boxes should be retained. The type, siting, management and monitoring of these boxes will be detailed in the EcMP.

Hedgehog

5.3.14. Hedgehog may be present throughout Site and the surrounding area. Due to the transitional nature of this species, it is recommended that the working areas and adjacent habitat are checked for any evidence of hedgehog ahead of the works. Works should proceed slowly and with caution, allowing any hedgehog the chance to escape the works area if encountered.

5.3.15. General mitigation measures as detailed, including restrictions on night-time working and the covering of excavations, will also minimise impacts on hedgehog.

INNPS

5.3.16. During the survey, cherry laurel, *Cotoneaster microphyllus* and snowberry were noted within or surrounding the Application Site. As *Cotoneaster microphyllus* is listed as a Schedule 9 Wildlife & Countryside Act (WCA) 1981, it is recommended that that an INNPS specialist is contacted for advice on its removal and mitigation. Although cherry laurel and snowberry are INNPS, they are not listed in Schedule 9 of the WCA and therefore could be removed as an enhancement opportunity. Butterfly bush was identified adjacent to the Application Site, but the shrub is encroaching onto the Application Site across the brick wall. It is also not listed in Schedule 9 of the WCA but should be removed from the Application Site if it spreads within the boundaries of the Application Site.

6. Impact Assessment

6.1 Overview

6.1.1. This section characterises the impacts and the subsequent effects (both positive and negative) of the Proposed Scheme on the IEFs within the project ZoI and assesses the significance of the residual effects (both positive and negative) based on the mitigation measures detailed in Section 5.

6.2 Residual Effects

6.2.1. A summary of the impact assessment, the proposed mitigation, and the residual effects during construction and operation are provided in Table 6-1 and Table 6-2, as well as details of proposed ecological enhancements.

6.2.2. If the design changes or the agreed mitigation cannot be implemented the effects will need to be reassessed and further surveys may be required. In this event, the conclusion of this EcIA may no longer be valid.

Construction

Bats

6.2.3. The Proposed Scheme may result in the disturbance and/or loss of a roost should they be present within the building assessed as being of low roosting potential (Sovereign House). As such, an emergence survey is required to determine if bats are roosting in the building. If they are confirmed to be present, a licence may be required to undertake the proposed works.

6.2.4. No trees will be removed as part of the Proposed Scheme. Areas of introduced shrub will be temporarily lost to facilitate the Proposed Scheme but will be replaced by native mixed scrub which replaces and potentially enhances the overall foraging resource available at the Application Site. This will result in a minor, temporary adverse effect at the Local level to foraging and commuting bats. Habitats are anticipated to be established within one year of the Proposed Scheme completion and will be subject to management in line with the habitat type and condition score attributed in the BNG assessment for the Application Site. Management of habitats to ensure recovery and establishment will be detailed in a HMMP for the Application Site.

6.2.5. Following the implementation of mitigation and compensation (detailed in Section 5) it is not anticipated that there will be a significant residual effect for bats at the Local level.

Operation

Bats

6.2.6. Lighting proposed for the Proposed Scheme may negatively impact roosting bats should they be present within nearby trees or buildings. This could result in the abandonment of a roost. This would result in a minor adverse (not significant) residual effect at the Local level.

6.2.7. Following the implementation of mitigation and compensation (detailed in Section 5) it is not anticipated that there will be a significant residual effect for bats at the Local level.

Table 6-1 - Summary of construction impacts, mitigation and residual effects on Important Ecological Features

Important Ecological Feature	Importance level	Impact description	Mitigation	Residual effects (Importance level affected)	Proposed enhancement/s
Bats – roosting	Local	Temporary disturbance to potential roost features. Potential permanent loss of roost if present (to be determined by emergence survey).	Potential EPS mitigation licence, Bat Mitigation Class Licence (BMCL) and/or notification of disturbance, dependent on results of further surveys. PMW for roosting bats. Sensitive working hours. Installation of bat boxes throughout the Application Site.	Potential – non-significant negative residual impact at Site level	None
Bats – commuting and foraging	Local	Temporary disturbance to commuting and foraging habitat. Permanent loss of commuting and foraging habitat.	PMW for commuting and foraging bats. Sensitive working hours. Sensitive construction lighting design.	Yes – non-significant negative residual impact at Site level	None

Table 6-2 - Summary of operational impacts, mitigation and residual effects on Important Ecological Features

Important Ecological Feature	Importance level	Impact description	Mitigation	Residual effects (Importance level affected)	Proposed enhancement/s

Bats – roosting	Local	None	None	None	None
Bats – commuting and foraging	Local	Permanent loss of commuting and foraging habitat.	Sensitive permanent lighting design.	None	None

6.3 Biodiversity Enhancements

6.3.1. In order to enhance and increase biodiversity across the Proposed Scheme, it is proposed that:

- Bird boxes present within the Application Site should be retained and additional boxes targeting common garden species should be installed on retained trees around the Application Site. Four nest boxes suitable for species tolerant of overlapping territories should be provided. Boxes chosen should include exclusion designs to prevent non target species occupying the nest boxes. The type, siting, management and monitoring of these boxes will be detailed in the EcMMP.
- The removal of INNPS within the Application Site, including cotoneaster, cherry laurel and snowberry, is proposed within the introduced scrub on site, with the replacement planting of native scrub within the site.
- Native scrubs planted as part of the landscaping scheme should include fruit and berry-bearing species which provide year-round foraging opportunities for birds, along with species that are known to be valuable to pollinators.
- A separate report for BNG will be provided with specific enhancement opportunities regarding the Proposed Scheme and biodiversity enhancement.

6.4 Ecological Management and Monitoring Plan

6.4.1. A detailed EcMMP will be produced for the Application Site which will include information on specifications for proposed enhancements, suitable locations and siting guidance for enhancements and proposals for the long-term management and monitoring of enhancement.

7. Conclusion

7.1.1. The Proposed Scheme involves the establishment of the Tribunals Courts (hereafter referred to as the 'Proposed Scheme') within the grounds of the Sovereign House

7.1.2. This EcIA is based on desk study and ecological survey data collected in January 2025. The scope of surveys included;

- Preliminary walkover with UK Hab survey;
- Daytime bat walkover;
- Preliminary roost assessment (structures); and
- Ground level tree assessment.

7.1.3. Following an assessment of the baseline conditions of the Application Site, the following IEFs were considered within the impact assessment;

- Temporary habitat loss (e.g. land used during construction that is subsequently to be restored);
- Habitat degradation (e.g. through sediment release, pollution events, and dust);
- Injury or mortality of protected and priority species;
- Disturbance including noise and vibration to protected and priority species; and
- Permanent habitat loss (loss of potential bat roosting features).

7.1.4. Following an assessment of the Proposed Scheme, the following impacts on IEF within the ZoI were identified;

- Bats.

7.1.5. The Application Site was also considered to provide suitable habitat for priority invertebrates, breeding birds, badgers, otters and hedgehog. Mitigation measures will be incorporated into the construction phase of the development to protect these ecological features should they occur within the Application Site.

7.1.6. The Proposed Scheme has sought to minimise impact on biodiversity through implementation of suitable mitigation, retention of trees, creation of new, higher value habitat (native mixed scrub) and through the incorporation of enhancements.

7.1.7. Taking into account the avoidance, mitigation and compensation, the Proposed Scheme conforms to NPPF and local planning policy. It is concluded that the Proposed Scheme will not result in a significant residual effect on any IEF throughout construction or operation.

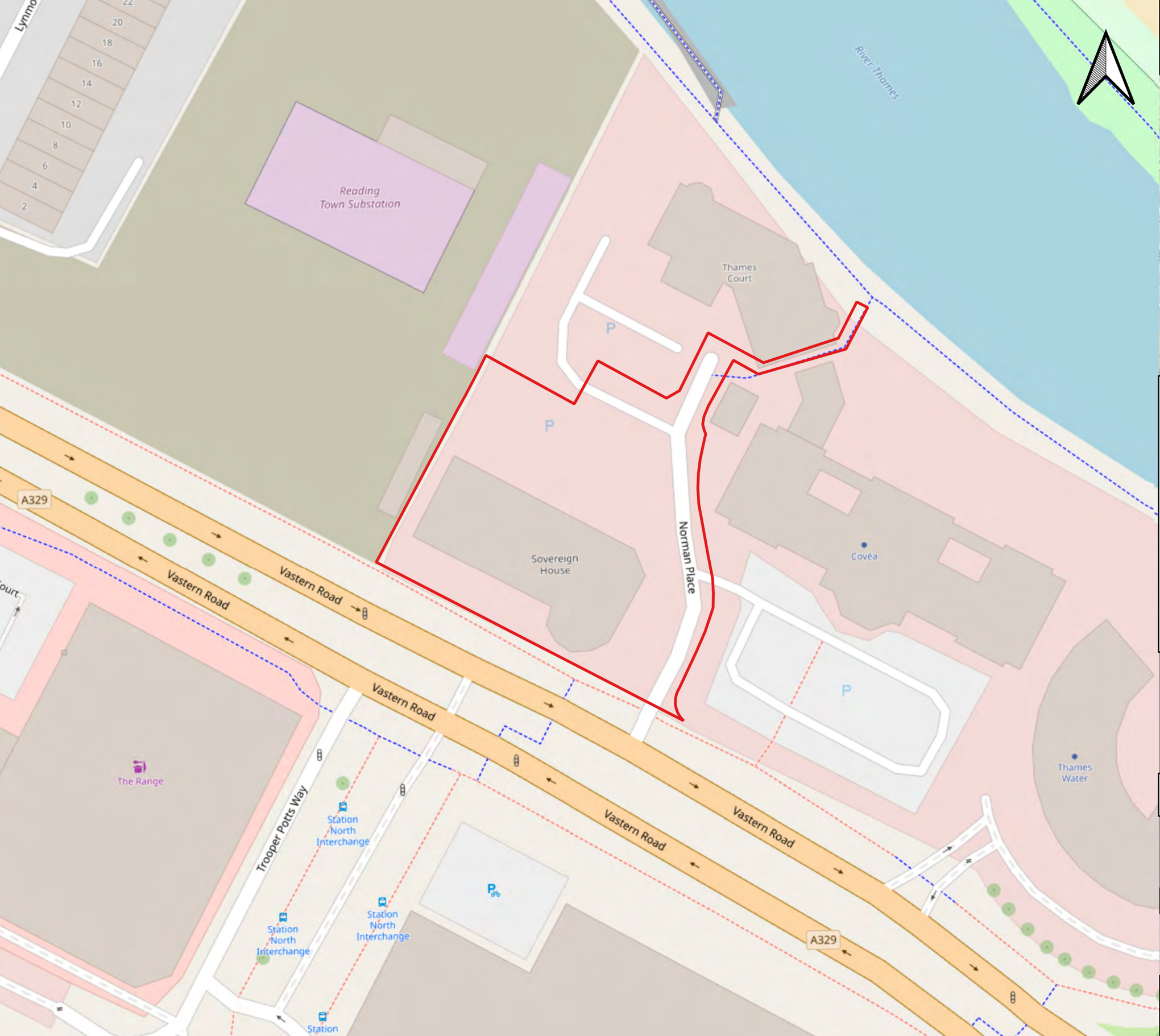
APPENDICES

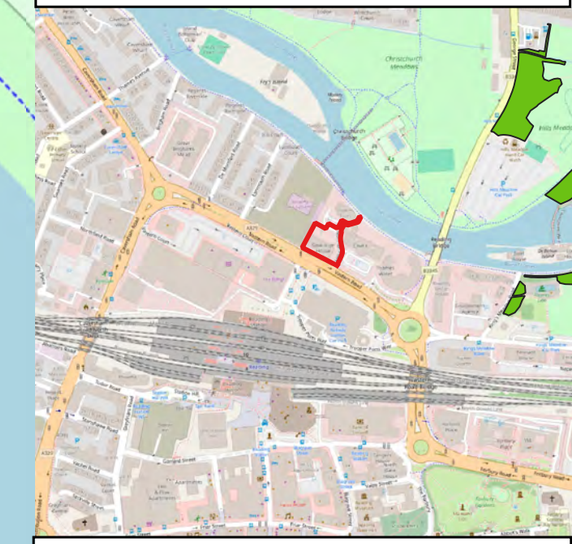
Appendix A. Site Location Plan and Proposed Scheme Figures

A.1 Site Location Plan

Figure A-1 - Site Location Plan

AtkinsRéalis





Legend

Site Boundary

0 15 30 m

Base Mapping:© OpenStreetMap contributors. This OpenStreetMap data is made available under the Open Database License: http://opendatacommons.org/licenses/odbl/1.0/. Any rights in individual contents of the database are licensed under the Database Contents License: http://opendatacommons.org/licenses/dbcl/1.0/

Original scale: 1:700.00	Figure No. A-1

AtkinsRéalis ©, Woodcote Grove, Ashley Road, Epsom, England, KT18 5BW

Project: Sovereign House

Client: HMCTS

Title: Sovereign House Site Location Plan

Drawn by: LH Date: 21/01/2025	Checked by: ARL Date: 07/03/2025	Reviewed by: VH Date: 11/03/2025

A.2 Proposed Scheme Plan

Figure A-2 - Proposed Scheme Plan

© Crown Copyright and database rights 2025. OS AC0000813445

DO NOT SCALE

Legend

- Planning application redline boundary
- Sovereign house building & ancillary structures
- Existing tree to be retained & root protection area
- Existing shrub to be retained
- Existing manhole cover and gully

Proposed

- Proposed native species tree (Refers to detail 1 on drawing L-401003)
- Proposed mixed species hedge (Refers to detail 3 on drawing L-401003)
- **Proposed planting mix A:** Meadow mix with ornamental grass at low-mid height (Refers to details 2 on drawing L-401003)
- **Proposed planting mix B:** Mix with small sized shrub, ground cover and flowering species at low-mid height (Refers to details 2 on drawing L-401003)
- **Proposed planting mix C:** In raised planter, mix with small sized flowering perennial and ornamental grass (Refers to details 2 on drawing L-401003)
- Amenity grass verge
- Proposed footway tarmac to match the adjacent footway paving
- Proposed gravel surfacing

Rev.	Date	Description	By	Chk'd	App'd
P01	14/03/25	FOR INFORMATION	YL	JH	

Drawing Status: FOR INFORMATION

Suitability: XX

AtkinsRéalis

www.atkinsrealis.com

© AtkinsRéalis (2025)

Client

Ministry of Justice
102 Petty France
London
SW1H 9AJ

Project Title

HMCTS READING SOVEREIGN HOUSE

Drawing Title

LANDSCAPE SOFTWORKS PLAN

Scale	Designed	Drawn	Checked	Authorised
1:200	YL	YL	JH	
Original Size	Date	Date	Date	Date
A1	14/03/2025	14/03/2025	14/03/2025	14/03/2025

Drawing Number: 100099718-ATR-XX-XX-D-L-401002

Revision: P01

USER: LINV3235 Date: 14/3/25 12:46:13 Filename: P:\GBCDB\Water\PLH Jobs\100099718 HMCTS Reading Sovereign House\7 WIP\LDR\100099718-ATR-XX-XX-D-L-401002_Landscape Softwork Plan.dwg

Appendix B. Further Survey Methodology

B.1 Bats

Surveyor Competencies

All bat surveys detailed below have been undertaken in accordance with the most recent good practice guidance[48] unless specified otherwise. Surveyors undertaking surveys held the relevant Chartered Institute of Ecology and Environmental Management (CIEEM) competencies for undertaking bat surveys[49].

Daytime Bat Walkover

A Daytime Bat Walkover (DBW) survey was undertaken across the Proposed Scheme on 22/01/2025 in order to observe, assess, and record any habitats suitable for bats to roost, commute, or forage both within and adjacent to the Application Site. The extent of the assessment was based on the zone of sensitivity for this species group and included all land within the Application Site and a 50 m buffer extending out in all directions, where access allowed (hereafter referred to as the Bat Survey Area). The DBW aimed to determine the suitability of the habitats present for bats and inform whether further bat surveys would be needed.

Roosting and foraging habitats and flightpaths were assessed separately and categorised for their potential suitability to support bats, in-line with Table B-1 below.

Table B-1 - Guidelines for assessing the potential suitability of the Application Site for bats

Potential suitability	Description	
	Roosting habitats in structures	**Potential flight-paths and foraging habitats**
None	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).	No habitat features on site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade/protection for flight-lines, or generate/shelter insect populations available to foraging bats).
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.	No obvious habitat features on site likely to be used as flight-paths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. 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 and not a classic	Habitats that could be used by small numbers of bats as flight-paths such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such

[48] Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London
[49] CIEEM (2013) Competencies for Species Survey: Bats. Chartered Institute of Ecology and Environmental Management, Winchester.

	cool/stable hibernation site, but could be used by individual hibernating bats).	as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	A structure 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, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).	Continuous habitat connected to the wider landscape that could be used by bats for flight-paths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
High	A structure 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. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by bats for flight-paths such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.

Structures were also assessed for their potential suitability to support winter roosting bats during the hibernation period. This assessment follows the rationale provided in Figure 4.1 of good practice guidance[48], which assigns either Low, Moderate, or High potential to each structure. The assessment considers features for access and roosting, temperature and humidity conditions within the structure (where accessible), surrounding habitat, and presence of roosts at other times of the year.

For trees, the following categorisations were applied:

- None – either no potential roost features in the tree or highly unlikely to be any;
- Further Assessment Required (FAR) – further assessment required to establish if potential roost features are present in the tree; and
- Potential Roost Feature (PRF) – a tree with at least one potential roost feature present.

The DBW informed subsequent further survey effort for roosts, flight-paths, and foraging habitats as detailed within the sections below.

Preliminary Root Assessment - Structures

The preliminary roost assessment of structures was undertaken on 22/01/2025 by competent surveyors.

The assessment involved a detailed visual examination of structures, which was initially undertaken from ground level, during daylight hours and aided with the use of binoculars and a bright torch.

The ground level visual examination involved the identification of potential entry/exit points for bats or other PRFs such as holes in brickwork, cracks, and gaps in masonry, etc. The external search aimed to locate any evidence of bats, such as live or dead specimens, bat droppings, urine splashes, feeding remains, fur-oil staining, bat-fly pupal cases, odour, and/or squeaking noises.

Based on the location, aspect, orientation, and characteristics of the features identified, each structure was categorised in terms of its potential suitability for bats. The assessment of potential suitability was carried out according to good practice guidance[48], which assigns each structure either None, Negligible, Low, Moderate, or High suitability for roosting bats as per Table B-1 above.

The suitability for winter roosting bats was also further assessed and refined at this stage, including the collection of temperature and humidity data, where appropriate.

Ground Level Tree Assessment

Trees identified as FAR or PRF during the DBW were subject to a Ground Level Tree Assessment (GLTA) on 22/01/2025. The GLTA involved the use of binoculars, a high-powered torch to identify PRFs such as woodpecker holes, rot holes, cracked limbs, dense ivy and flaking bark etc. Where PRFs were noted, their PRF type, position on the tree (trunk or limb), height and orientation of the features were noted, and photographs were also taken.

Appendix C. Planning Policy

C.1 National Planning Policy Framework, 2024

The National Planning Policy Framework (NPPF) sets out the Governments planning policies for England and how these are expected to be applied by Local Authorities within their Local Development Frameworks (LDF). The revised National Planning Policy Framework was published in December 2024.

Chapter 15 of the NPPF 'Conserving and enhancing the natural environment' sets out the requirements to consider biodiversity in planning decisions.

The paragraphs within Chapter 15 are relevant to the Scheme, the key information from which is detailed below:

Para 187: Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Para 188: Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework[50]; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

Para 189: Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads[51]. The scale and extent of development

[50] Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.
[51] *English National Parks and the Broads: UK Government Vision and Circular 2010* provides further guidance and information about their statutory purposes, management and other matters.

within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

Para 190: When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development[52] other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;

b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and

c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

Para 191: Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 189), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.

Habitats and biodiversity

Para 192: To protect and enhance biodiversity and geodiversity, plans should:

a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity[53]; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation[54]; and

b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

Para 193: When determining planning applications, local planning authorities should apply the following principles:

a) 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;

b) 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

[52] For the purposes of paragraphs 190 and 191, whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.
[53] Circular 06/2005 provides further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system.
[54] Where areas that are part of the Nature Recovery Network are identified in plans, it may be appropriate to specify the types of development that may be suitable within them.

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;

c) 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[55] and a suitable compensation strategy exists; and

d) 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.

Para 194: The following should be given the same protection as habitats sites:

a) potential Special Protection Areas and possible Special Areas of Conservation;

b) listed or proposed Ramsar sites[56]; and

c) sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

Para 195: The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

[55] For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.
[56] Potential Special Protection Areas, possible Special Areas of Conservation and proposed Ramsar sites are sites on which Government has initiated public consultation on the scientific case for designation as a Special Protection Area, candidate Special Area of Conservation or Ramsar site.

C.2 Reading Borough Local Plan

Policy EN12: Biodiversity and the Green Network

a) The identified Green Network, the key elements of which are shown on the Proposals Map, shall be maintained, protected, consolidated, extended and enhanced. Permission will not be granted for development that negatively affects the sites with identified interest or fragments the overall network. The Green Network comprises:

- Sites with identified biodiversity interest - Local Wildlife Sites, Local Nature Reserves, Biodiversity Opportunity Areas, protected and priority species and their habitats, Priority and Biodiversity Action Plan habitats, and the River Thames and all its tributaries (including the River Kennet and the Kennet & Avon Canal); and

- Areas with potential for biodiversity value and which stitch the Green Network together – designated Local Green Space and open green spaces, and existing and potential Green Links.

New development shall demonstrate how the location and type of green space, landscaping and water features provided within a scheme have been arranged such that they maintain or link into the existing Green Network and contribute to its consolidation. Such features should be designed to maximise the opportunities for enhancing this network. All new development should maximise opportunities to create new assets and links into areas where opportunities are as yet unidentified on the Proposals Map.

b) On all sites, development should not result in a net loss of biodiversity and geodiversity, and should provide a net gain for biodiversity wherever possible. Development should:

- Protect and wherever possible enhance features of biodiversity interest on and adjacent to the application site, incorporating and integrating them into development proposals wherever practicable; and

- Provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable.

In exceptional circumstances where the need for development clearly outweighs the need to protect the value of the site, and it is demonstrated that the impacts cannot be: 1) avoided; 2) mitigated or; 3) compensated for on-site; then new development will provide off-site compensation to ensure that there is “no net loss” of biodiversity. Provision of off-site compensation shall be calculated in accordance with nationally or locally recognised guidance and metrics. It should not replace existing alternative habitats and should be provided prior to development.

Policy EN12: Trees, hedges and woodland

“Individual trees, groups of trees, hedges and woodlands will be protected from damage or removal where they are of importance, and Reading’s vegetation cover will be extended. The quality of waterside vegetation will be maintained or enhanced.

New development shall make provision for tree retention and planting within the application site, particularly on the street frontage, or off-site in appropriate situations, to improve the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change. Measures must be in place to ensure that these trees are adequately maintained.”

C.3 Reading Biodiversity Action Plan (2021)

The previous Reading BAP (2006) ran until 2015. It has not been updated. It was organised into 19 'Action Plans', divided into the following BAP Habitats and Species:

Habitats

- Urban I
- Urban II
- Semi-Natural Grasslands
- Parkland and Veteran Trees
- Ancient and Species Rich Hedgerows
- Broad Leaved Woodland
- Ponds (Standing Open Water) and Reedbeds
- Rivers

Species

- Black Poplar
- Loddon Lilly
- Glow Worm
- Stag Beetle
- Bat Species
- Water Vole
- Black Redstart
- House Sparrow
- Sand Martin
- Great Crested Newt
- Slow Worm

The updated BAP is organised differently, around themes rather than habitats and species. These themes for action are listed below:

- Legislation
- Designated sites
- Planning and building control
- Woodlands, trees and hedgerow
- Grasslands and road verges
- The two rivers, their floodplains and other watercourses

- Management of Council projects and the sale of land
- Education, access to nature, public engagement and volunteering
- Ecological records
- Species and habitat specific actions
- Connectivity
- Coordinated approach across Council departments and within policy documents
- Global biodiversity – what can the Council do?
- Ongoing review

C.4 Levelling Up and Regeneration Act 2023

This act introduces wide-ranging reforms to the planning system including the introduction of National Development Management Policy (NDMP), amendments to the local and neighbourhood planning Nationally Significant Infrastructure (NSIP) process, and the Infrastructure Levy.

Relevant sections on biodiversity planning include:

Section 136 - Ancient woodland

A requirement that the Secretary of State vary the Town and Country Planning (Consultation) (England) Direction 2021 so that it applies in relation to applications for planning permission for development affecting ancient woodland within three months of the Act being passed.

This amendment to the Act will require local planning authorities to consult the Secretary of State, prior to granting planning permission for developments that affect ancient woodland.

Section 135 - Biodiversity Net Gain (BNG), Pre-development biodiversity value

This provides a clause to ensure that habitats assessed for BNG during pre-development calculations are taken at their highest value on site prior to any proposed clearance that could have been undertaken during a previous activity (e.g., a previous planning application). This is to reduce incentives to clear habitats on potential BNG sites or off-site contributions to BNG.

Please note - key legislation relating to BNG is contained within the Environment Act 2021 and the secondary legislation that is currently under Parliamentary process.

Section 95, 98, 15C - Local Nature Recovery Strategies

This strengthens Local Nature Recovery Strategies (LNRS) from the Environment Act 2021, that the local plan must take account of any LNRS that relate to the local planning authority's area, this includes neighbourhood areas and spatial development strategies.

The LNRS which will map biodiversity priorities for given authority should be used during the BNG planning and design process, such as in determining the Strategic Significance (SS) factor for the statutory metric calculation or in providing suitable location for BNG off-site contributions.

Part 6 - Environmental Outcome Reports

This section of the Act, set outs the framework for the replacement of Environmental Impact Assessments (EIA), Sustainability Appraisals (SE) and Strategic Environmental Assessments (SEA), with Environmental Outcome Reports (EOR).

There are two categories of plans and developments that will require an Environmental Outcome Report; consents which will require an assessment in all circumstances and consents which will require an assessment if the criteria set out in Act are met, which at the time of writing are not produced. An EOR must assess:

- Reasonable alternatives and compliance with the mitigation hierarchy during early development of the project.
- Assessment of contribution towards achieving an outcome supported by the indicators set out in future guidance.
- Residual effects on the environment identified through the underlying technical work, with relevant conclusions in technical disciplines.

- Current baseline and relevant data.
- Proposed mitigation and monitoring proposals.
- Cumulative effects of the project as a whole on outcomes and how this relates to the conclusions of any strategic or plan level assessment.

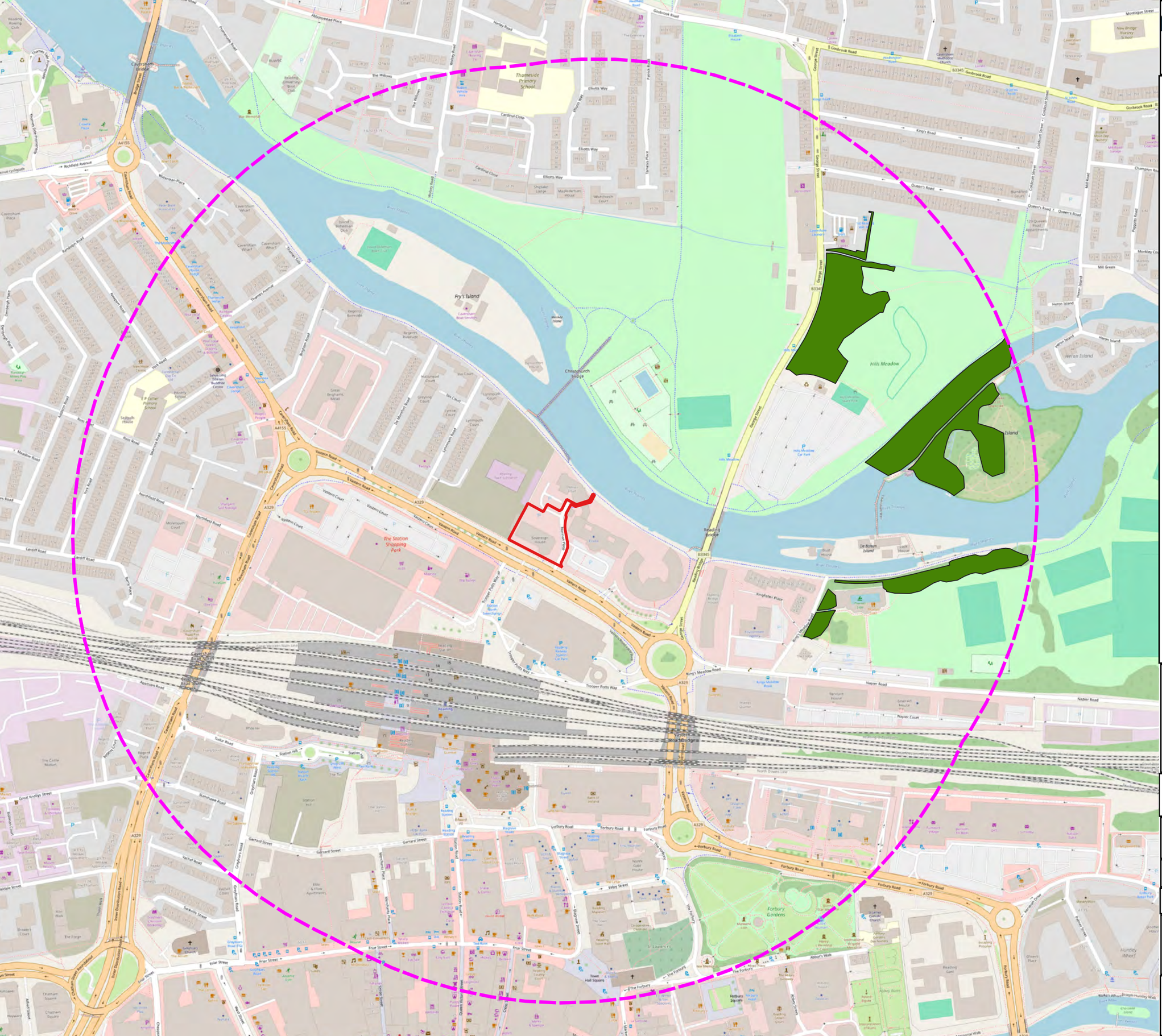
The Act states that future EOR regulations may provide interaction with existing environmental assessment legislation, including the Habitats Regulations.

Outcomes would need to be set by secondary legislation with a supporting suite of ‘indicators’ for each outcome stated in Government guidance, which at the time of writing are not produced.

Appendix D. Designated Sites Location

D.1 Priority Habitats within 500 m of the Site

Figure D-1 - Priority Habitats within 500 m of the Site



AtkinsRéalis

Legend

Site Boundary

Priority habitats

Deciduous woodland

0 100 200 m

Base Mapping:© OpenStreetMap contributors. This OpenStreetMap data is made available under the Open Database License: http://opendatacommons.org/licenses/odbl/1.0/. Any rights in individual contents of the database are licensed under the Database Contents License: http://opendatacommons.org/licenses/dbcl/1.0/

Original scale: 1:4000.00	Figure No. D-1

AtkinsRéalis ©, Woodcote Grove, Ashley Road, Epsom, England, KT18 5BW

Project: Sovereign House

Client: HMCTS

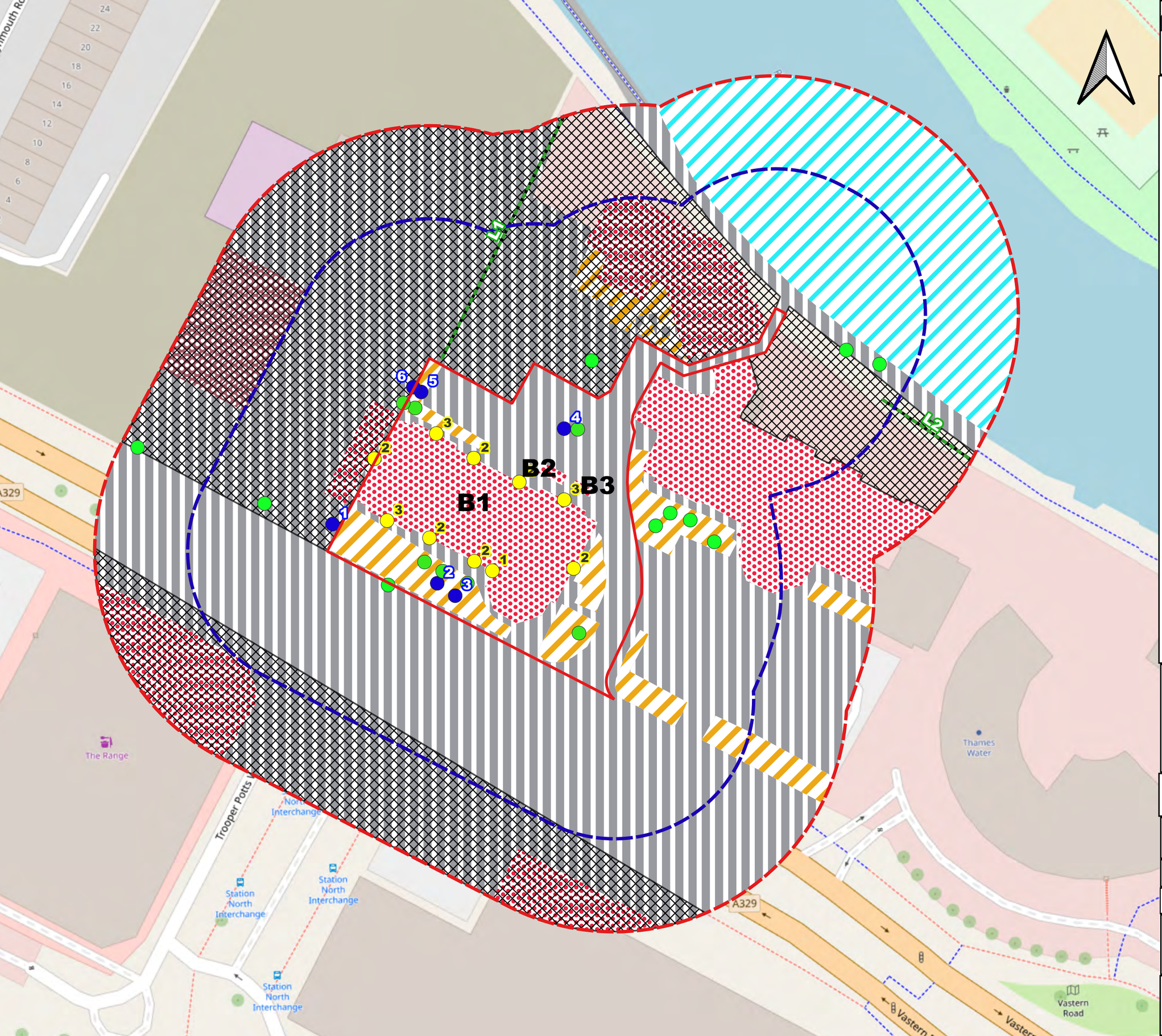
Title: Sovereign House Priority Habitats within 500 m

Drawn by: LH Date: 17/01/2025	Checked by: ARL Date: 07/03/2025	Reviewed by: VH Date: 11/03/2025

Appendix E. UKHab Survey Plan and Target Notes

E.1 UKHab Survey Plan and Target Notes

Figure E-1 - UKHab Survey Plan and Target Notes



AtkinsRéalis

Legend

- Site redline Boundary
- 30 m buffer
- 50 m buffer

Habitats

- u1 - built-up areas and gardens, 847 - introduced shrub
- u1b - developed land. sealed surface
- u1b5 - buildings
- u1c - artificial unvegetated unsealed surface
- r1 - standing open water and canals
- No access areas

Linear features

- w1g, 33 - line of trees
- Target Notes
- Preliminary Roost Assessment
- Individual trees

BX = Building numbers

0 20 40 m

Base Mapping:© OpenStreetMap contributors. This OpenStreetMap data is made available under the Open Database License: http://opendatacommons.org/licenses/odbl/1.0/. Any rights in individual contents of the database are licensed under the Database Contents License: http://opendatacommons.org/licenses/dbcl/1.0/

Original scale: 1:750.00	Figure No. E-1

AtkinsRéalis ©, Woodcote Grove, Ashley Road, Epsom, England, KT18 5BW

Project: Sovereign House

Client: HMCTS

Title: HMCTS Sovereign House Habitat Survey Plan with target notes

Drawn by: LH Date: 28/01/2025	Checked by: ARL Date: 07/03/2025	Reviewed by: VH Date: 11/03/2025

E.2 Target Notes and Photographs

Table E-1 - Target notes and photographs

Target Note	Description	Photograph
TN 1	Butterfly bush – not present within the Application Site but is spreading over the brick wall on the western boundary of the Application Site. Note that although butterfly bush is not a Schedule 9 species of the Wildlife and Countryside Act 1981, it is considered to be an invasive species.	
TN 2-4	Bird nest boxes on trees (three present)	

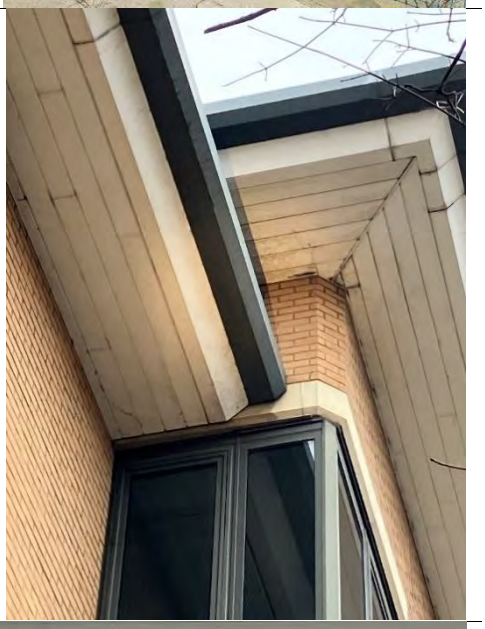
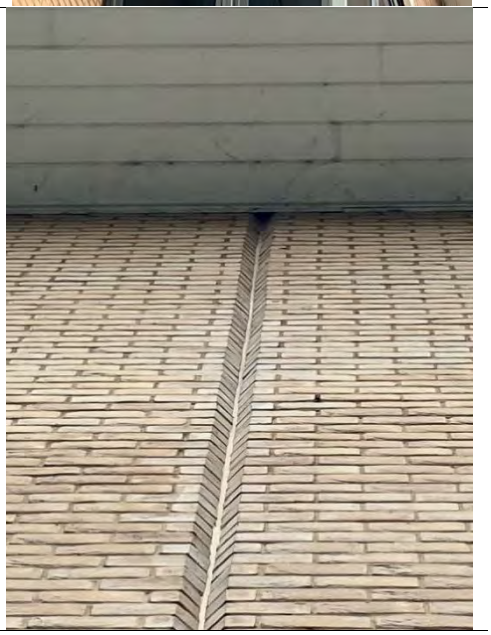
TN 5	Bird feeding box and insect hotel on goat willow tree	

TN 6	Hedgehog box	

E.3 Preliminary Roost Assessment

Table E-2 - PRA details

Building or PRF number	Description	Photograph
B1	Sovereign House – three-storied, newly built brick building used as an office and currently closed, due to be reopened as a tribunals court.	
B2	Small brick outbuilding with a tiled, pitched roof and a door with metal slats.	

B3	Brick outbuilding used as a bin store/.	
PRF 1	PRF on building 1 (Sovereign House). Potential hole in soffit on western side of southeast atrium. Also, a thin gap between soffit and brick on the second floor below.	
PRF 2	PRF on building 1. Channel in brickwork that leads up to a gap in the soffit, potential access for bats to get into soffit board. Six channels found on main building (locations shown on Figure E-1).	

PRF 3	Gaps in gables extending south and north of the building 1 allowing access into the loft space	

Appendix F. Survey Results

F.1 Botanical

Habitat Descriptions and Species Lists

Table F-1 - Summary of habitats within the Site (Bold species are Schedule 9 in WCA)

UKHab Level 3 habitat type	Plant species common name	Plant species Latin name
Introduced shrub (u1, 847)	Ash (sapling)	*Fraxinus excelsior*
	Bay laurel	*Laurus nobilis*
	Brachyglottis species	*Brachyglottis* species
	Bramble	*Rubus fruticosus*
	Cherry laurel	*Prunus laurocerasus*
	Climbing hydrangea	*Hydrangea petiolaris*
	Common nettle	*Urtica dioica*
	Common snowberry	*Symphoricarpos albus*
	Cotoneaster	***Cotoneaster microphyllus***
	Dandelion	*Rubus fruticosus*
	Dogwood	*Cornus sanguinea*
	Elephant's ears	*Bergenia* species
	Fortune's spindle	*Euonymus fortune*
	Holly (sapling)	*Ilex aquifolium*
	Lavender species	*Lavandula* species
	Mediterranean spurge	*Euphorbia characias*
	Oregon grape	*Berberis aquifolium*
	Privet-like honeysuckle	*Lonicera ligustrina*
	Viburnum	*Viburnum davidii*
	Wintergreen barberry	*Berberis julianae*
Individual urban trees	Common lime	*Tilia x europaea*
	Deodar cedar	*Cedrus deodara*
	Goat willow	*Salix caprea*
	Norway maple	*Acer platanoides*
	London Plane	*Platanus x hispanica*
	Whitebeam	*Sorbus aria*
	White poplar	*Populus alba*

AtkinsRéalis

Ecology
AtkinsRéalis UK Limited
Woodcote Grove
Ashley Road
Epsom
KT18 5BW

Tel: +44 (0)1372 726140
Fax: +44 (0)1372 740055

© AtkinsRéalis UK Limited except where stated otherwise