

PRELIMINARY ECOLOGICAL APPRAISAL & BIODIVERSITY NET GAIN ASSESSMENT

FOR

**VILLAGE HOTEL READING
CAVERSHAM BRIDGE,
RICHFIELD AVENUE,
READING,
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CONTENTS PAGE

1	EXECUTIVE SUMMARY	3
2	INTRODUCTION	5
2.1	Project Background	5
2.2	Site Description, Location and Context	5
2.3	Report Objectives	5
3	LEGISLATIVE BACKGROUND	7
3.1	Overview	7
3.2	European Protected Species Mitigation Licensing	7
4	POLICY BACKGROUND	9
4.1	National Planning Policy	9
4.2	Local Planning Policy	11
5	SURVEY METHODOLOGY	13
5.1	Baseline Information	13
5.2	Biodiversity Net Gain Approach	14
6	BASELINE INFORMATION	16
6.1	Desk Study	16
6.2	Field Survey	19
7	POST-DEVELOPMENT DESIGN	21
7.1	Proposed Habitats	21
7.2	Biodiversity Metric Result	22
8	DISCUSSION	23
8.1	Designated Sites for Nature Conservation	23
8.2	Habitats	23
8.3	Bats	24
8.4	Great Crested Newt (and other amphibians)	24
8.5	Hazel Dormouse (and other terrestrial mammals)	24
8.6	Reptiles	25
8.7	Birds	26
8.8	Invertebrates	26
8.9	Invasive Non-native Species	26
9	RECOMMENDATIONS	27
9.1	Overview	27
9.2	Biodiversity Net Gain	27
9.3	Habitat Protection Measures	28
9.4	Bats (Sensitive Lighting)	28
9.5	Precautionary Avoidance Measures	28
9.6	Nesting birds	29
9.7	Biodiversity Enhancement Opportunities	29
10	REFERENCES	30

APPENDIX 1 - SITE PHOTOGRAPHS

APPENDIX 2 - BASELINE HABITAT PLAN

APPENDIX 3 - PROPOSED HABITAT PLAN

APPENDIX 4 - PROTECTED SPECIES LEGISLATION

APPENDIX 5 - SURVEY LIMITATION

1 EXECUTIVE SUMMARY

- 1.1.1** Viewpoint Associates LLP were commissioned by Village Hotels to provide a Preliminary Ecological Appraisal (PEA) and Biodiversity Net Gain (BNG) Assessment at Village Hotel Reading. The PEA and BNG Assessment were commissioned to accompany a planning application to be submitted to Reading Borough Council seeking consent for a single storey, flat roof extension at the ground floor level to the front of existing hotel to create extension to Health & Wellness Club and replacement of canopy to main entrance and associated landscaping and parking.
- 1.1.2** The desk study (including a 1km data search) revealed that the application site is not statutorily or non-statutorily designated for its wildlife interest and has no protected/notable species records. Sarah Foot MCIEEM and Lauren Hayward carried out a site visit on the 10th April 2025.
- 1.1.3** The application site is a 0.17ha area at the Village Hotel Reading, comprising the frontage of the hotel with associated hard and soft landscaping. Most of the site constitutes urban habitats (i.e. buildings and hard standing) of very low distinctiveness; but the soft landscaping on site is well-established, comprising introduced shrub and mature trees (including specimens covered by a TPO), and therefore holds site level ecological value.
- 1.1.4** The Statutory Biodiversity Metric calculation tool (enclosed separately) demonstrates the feasibility of delivering a minimum 10% net gain for biodiversity. The biodiversity metric tool shows that the landscaping proposals will deliver a total net change of 12.15% in habitat units.
- 1.1.5** No evidence of bat presence and no potential roost sites were identified in relation to the frontage of the hotel that is to be impacted by the proposed studio extension.
- 1.1.6** The following ecological recommendations have been made:
- BNG project implementation and habitat management;
 - Habitat protection measures (for mature trees on site);
 - Sensitive light scheme for bats;
 - Precautionary avoidance measures (for hedgehogs);
 - Precautions for nesting birds; and
 - Biodiversity Enhancement Opportunities.

1.1.7 This report will likely be valid for up to 18 months; after which point a professional ecologist may need to review the report's validity (CIEEM 2019b).

2 INTRODUCTION

2.1 Project Background

2.1.1 Viewpoint Associates LLP were commissioned by Village Hotels to provide a Preliminary Ecological Appraisal (PEA) and Biodiversity Net Gain (BNG) Assessment at Village Hotel Reading. The PEA and BNG Assessment were commissioned to accompany a planning application to be submitted to Reading Borough Council seeking consent for a single storey, flat roof extension at the ground floor level to the front of existing hotel to create extension to Health & Wellness Club and replacement of canopy to main entrance and associated landscaping and parking.

2.2 Site Description, Location and Context

2.2.1 The application site comprises the frontage of the hotel building with associated hard and soft landscaping (central OS grid ref.: SU 71092 74502).

2.2.2 The site includes the hard standing carpark, integrated shrub beds, clipped box hedges bordering the front of the main building and mature trees. The immediate surroundings are built up with a mixture of commercial and residential buildings, with the rear of the building being adjacent to the River Thames. The wider area is mostly built up (central Reading) with areas of farmland further to the west.

2.3 Report Objectives

2.3.1 The aim of this PEA is to understand the nature of the site and assess its ecological value. The key objectives are to:

- identify any likely ecological constraints associated with the planning proposals;
- establish appropriate mitigation measures in accordance with the mitigation hierarchy (i.e. avoid > mitigate > compensate);
- determine any additional surveys that may be required following on from this preliminary stage; and
- recognise opportunities to deliver ecological enhancements in line with national and local planning policy.

2.3.2 The aim of this BNG Assessment is to demonstrate the feasibility of a minimum 10% on-site net gain in biodiversity as part of the proposed development. The key objectives are to:

- detail the approach taken for the BNG calculation (i.e. the Statutory Biodiversity Metric);

- describe and map the baseline habitats and important ecological features on site;
- describe and map the proposed habitats based on post-development design;
- complete the biodiversity metric tool with supporting condition assessment sheets; and
- outline the implementation of the design concepts and the long-term management to deliver BNG.

2.3.3 This report should be read in conjunction with the completed Statutory Biodiversity Metric calculation tool and habitat condition assessment documents.

3 LEGISLATIVE BACKGROUND

3.1 Overview

3.1.1 The following legislation is considered relevant for the purpose of this preliminary ecological appraisal:

- Wildlife and Countryside Act (W&CA) 1981 (as amended)
- Conservation of Habitats and Species Regulations 2017 ('Habitat Regulations')
- Countryside and Rights of Way (CROW) Act 2000
- Natural Environment and Rural Communities (NERC) Act 2006
- Protection of Badgers Act 1992
- Wild Mammals (Protection) Act 1996

3.1.2 These acts hold relevance to both protected and invasive species and the degree of protection varies depending on faunal/floral group or species. For example, some species of European importance receive full protection within the UK under the Habitat Regulations (e.g., bats), whereas others, may only be afforded protection through national legislation such as the Wildlife and Countryside Act 1981 (as amended) (e.g., common lizard). For a detailed overview of species-specific legislation, please refer to **Appendix 4**.

3.2 European Protected Species Mitigation Licensing

3.2.1 The Government's statutory nature conservation advisory organisation, Natural England, is responsible for issuing European Protected Species (EPS) mitigation licences that permit activities that would otherwise lead to an infringement of the Habitat Regulations. An EPS mitigation licence can be issued if the following three tests derived from Regulation 55 have been satisfied:

- (2)(e) – the derogation is for the purposes of '*preserving public health or public safety or other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment.*'
- (9)(a) – there is '*no satisfactory alternative*' to the derogation; and
- (9)(b) – '*the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.*'

3.2.2 Local Planning Authorities (LPAs) have a statutory duty under Regulation 7(3)(e) of the Habitat Regulations consider and determine whether these three tests are likely to be satisfied by planning proposals affected EPS before granted planning permission. If an EPS mitigation licence is necessary, a licence can be sought once all the necessary planning consents have been granted. Natural England aims to issue a decision on licence applications within 30 working days of submission.

4 POLICY BACKGROUND

4.1 National Planning Policy

- 4.1.1** The biodiversity duty imposed through the Environment Act 2021 states that Local Planning Authorities (LPAs) must consider what action they can take to conserve and enhance biodiversity in England.
- 4.1.2** The ODPM Circular 06/2005 provides guidance on the application of the law relating to planning and nature conservation in England, stating that *'the presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat.'*
- 4.1.3** The revised National Planning Policy Framework (NPPF), published in December 2024, sets out the Government's planning policies for England and how they should be applied. Section 15 of the NPPF sets out the approach local authorities should adopt to conserve and enhancing the natural environment when preparing planning policy and when considering planning applications. Paragraph 193 sets out the principles LPAs should apply when determining planning applications, as follows:

'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

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 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.'

- 4.1.4** The selection of excerpts taken from Section 15 refer to Biodiversity Net Gain (BNG) as follows:

'Paragraph 187. Planning policies and decisions should contribute to and enhance the natural and local environment by: [...] 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 [...]

Paragraph 192. To protect and enhance biodiversity and geodiversity, plans should: [...] 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 [...]

- 4.1.5** In England, BNG became mandatory for major development from the 12th February 2024 and for minor development (small sites) from the 2nd April 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). In practice, planning permission in England is now subject to a condition to secure a minimum 10% net gain for biodiversity, unless the development is a type that is exempt from mandatory BNG requirements.

4.2 Local Planning Policy

4.2.1 Planning policy within the Reading Borough is defined by the policies within the Local Plan (adopted Nov 2019). The policy relevant to biodiversity and natural environment is as follows:

'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.’

5 SURVEY METHODOLOGY

5.1 Baseline Information

Desk Study

- 5.1.1** A desktop study was conducted by Conor Watson ACIEEM and Lauren Hayward. The study utilised data from the local environmental records centre and online resources to acquire information on the nature of the site and its surroundings, and to highlight any potential ecological features.
- 5.1.2** Thames Valley Environmental Records Centre (TVERC) was commissioned to undertake a search of pre-existing records of protected and/or notable species and non-statutorily designated wildlife sites held by them for the site and land within a 1km radius search area.
- 5.1.3** The DEFRA Data Services Platform was used to obtain geospatial datasets for designated sites (i.e., RAMSAR, SPA, SAC, SSSI) and habitat inventories (i.e., Priority Habitat Inventory, Ancient Woodland Inventory) to be analysed in QGIS. The Multi-Agency Geographical Information Centre (MAGIC) website was examined for granted European protected species applications. Furthermore, geospatial datasets and Google Earth satellite imagery were used to determine the extent and connectivity of habitats, how the site is linked to the surrounding landscape and whether the development could have wider scale impacts on biodiversity.

Field Survey

- 5.1.4** A site walkover was undertaken on 10th April 2025 by Sarah Foot MCIEEM and Lauren Hayward. The site was surveyed using the UK Habitat Classification (UKHab) system (UKHab Ltd 2023) in accordance with the CIEEM Guidelines for Preliminary Ecological Appraisal 2nd Edition (CIEEM 2017). Particular attention was given to evidence of protected and priority species (NERC Act 2006 Section 41 species of principal importance) and the site's potential to support such species.
- 5.1.5** There were no significant survey constraints because full access was available to the site. The survey was subject to seasonal constraints because not all plant and animal species are visible throughout the year and therefore the report represents a snapshot of the site at the time of the survey only.

Report Validity

- 5.1.6** This report will likely be valid for up to 18 months; after which point a professional ecologist may need to undertake a site visit and update the desk study to review the report's validity (CIEEM 2019b).

5.2 Biodiversity Net Gain Approach

- 5.2.1** This Biodiversity Net Gain (BNG) Assessment uses the Statutory Biodiversity Metric (February 2024) to calculate the losses and gains in biodiversity unit value resulting from the proposed redevelopment. The biodiversity metric tool has been used to assess the feasibility of the proposed site layout and landscaping in delivering a minimum 10% net gain for biodiversity.

- 5.2.2** The biodiversity metric rules must be followed for a valid biodiversity net gain and are as follows:

Rule 1: *The trading rules of this biodiversity metric must be followed.*

Rule 2: *Biodiversity unit outputs, for each type of unit, must not be summed, traded, or converted between types. The requirement to deliver at least a 10% net gain applies to each type of unit.*

Rule 3: *To accurately apply the biodiversity metric formula, you must use the statutory biodiversity metric calculation tool or small sites biodiversity metric tool (SSM) for small sites.*

The tools remove the need for a user to manually calculate the change in biodiversity value.

The tool will summarise the results of the calculation and inform a user whether the biodiversity net gain objective has been met.

Rule 4: *In exceptional ecological circumstances, deviation from this biodiversity metric methodology may be permitted by the relevant planning authority.*

- 5.2.3** The biodiversity metric principles inform the use of the biodiversity metric tool and are as follows:

Principle 1: *The metric assessment should be completed by a competent person.*

Principle 2: *The use of this biodiversity metric does not override existing*

biodiversity protections, statutory obligations, policy requirements, ecological mitigation hierarchy or any other requirements. This includes consenting or licensing processes, for example woodlands.

Principle 3: *This biodiversity metric should be used in accordance with established good practice guidance and professional codes.*

Principle 4: *This biodiversity metric is not a complex or comprehensive ecological model and is not a substitute for expert ecological advice.*

Principle 5: *Biodiversity units are a proxy for biodiversity and should be treated as relative values.*

Principle 6: *This biodiversity metric is designed to inform decisions in conjunction with locally relevant evidence, expert input, or guidance.*

Principle 7: *Habitat interventions need to be realistic and deliverable within a relevant project timeframe.*

Principle 8: *Created and enhanced habitats should be, where practical and reasonable, local to any impact and deliver strategically important outcomes for nature conservation.*

Principle 9: *This biodiversity metric does not enforce a minimum habitat size ratio for compensation of losses. Proposals should aim to:*

- *maintain habitat extent - supporting more, bigger, better and more joined up ecological networks*
- *ensure that proposed or retained habitat parcels are of sufficient size for ecological function'*

6 BASELINE INFORMATION

6.1 Desk Study

Designated Sites and Priority Habitats

- 6.1.1** The desk study returned no internationally designated statutory sites within a 5km radius of the application site and no nationally designated statutory sites within a 2km radius. Two locally designated non-statutory sites, one of which is a complex comprising six sites, were highlighted within a 1km search radius of the site – see **Table 1** below.

Table 1. Non-statutory designated sites within the vicinity of the site (Source: TVERC).

Site name	Designation	Description	Distance (m)
The Warren Woodlands Complex	Local Wildlife Site (LWS)	7.64ha complex of six woodland sites situated on the chalk scarp of The Warren in Caversham.	400 N
Cow Lane Depot	Local Wildlife Site (LWS)	1.544ha site bounded by a railway track near the centre of Reading. It forms a mosaic of habitats ranging from willow scrub with mature trees, to open standing water with swamp to ruderal and tall herb grassland.	680 SW

- 6.1.2** The application site contains no irreplaceable habitats (e.g. Ancient Semi-natural Woodland) or priority habitats (NERC Act 2006 Section 41 habitats of principle importance).

Protected and Notable Species

- 6.1.3** The search of the TVERC database revealed a range of protected and/or notable species records starting from the mid-1980s. Only recent records defined as fewer than ten years old are included in this report (see **Tables 2a & 2b**).

Table 2a. Recent protected and/or notable species records within the vicinity of the site (Source: TVERC).

Common name	Scientific name	Most recent record	No. of records	Nearest distance (m)	Precision (m)	Status
Amphibians & Reptiles						
Grass snake	<i>Natrix helvetica</i>	2016	1	~675	100	WCA_5s91k NERC_s41
Slow-worm	<i>Anguis fragilis</i>	2017	1	~950	10	WCA_5s91k NERC_s41
Birds						
Black redstart	<i>Phoenicurus ochruros</i>	2023	2	~770	100	WCA_1p1
Brambling	<i>Fringilla montifringilla</i>	2022	2	0	1000	WCA_1p1
Common scoter	<i>Melanitta nigra</i>	2020	1	~475	1000	WCA_1p1 Bird-Red

Fieldfare	<i>Turdus pilaris</i>	2022	16	0	1000	WCA_1p1 Bird-Red
Firecrest	<i>Regulus ignicapilla</i>	2022	4	~550	100	WCA_1p1
Kingfisher	<i>Alcedo atthis</i>	2023	11	0	1000	WCA_1p1
Peregrine	<i>Falco peregrinus</i>	2023	157	~735	100	WCA_1p1
Red kite	<i>Milvus milvus</i>	2023	44	~85	100	WCA_1p1
Redwing	<i>Turdus iliacus</i>	2022	101	~840	100	WCA_1p1
White-tailed eagle	<i>Haliaeetus albicilla</i>	2021	4	~480	1000	WCA_1p1
Higher Plants						
Bluebell	<i>Hyacinthoides non-scripta</i>	2018	1	~975	100	WCA_8
Invertebrates						
Stag Beetle	<i>Lucanus cervus</i>	2023	77	~110	1	NERC_S41
Grizzled skipper	<i>Pyrgus malvae</i>	2015	1	~950	100	NERC_S41
Small heath	<i>Coenonympha pamphilus</i>	2022	4	~160	10	NERC_S41
Mammals – Bats						
Brown long-eared bat	<i>Plecotus auritus</i>	2022	10	~265	1	HabReg_2 NERC_s41 WCA_5s94b/c
Common pipistrelle	<i>Pipistrellus pipistrellus</i>	2023	54	~390	1	HabReg_2 WCA_5s94b/c
Daubenton's bat	<i>Myotis daubentonii</i>	2023	30	~230	100	HabReg_2 WCA_5s94b/c
Leisler's bat	<i>Nyctalus leisleri</i>	2017	1	~490	1000	HabReg_2 WCA_5s94b/c
Nathusius' pipistrelle	<i>Pipistrellus nathusii</i>	2019	14	~215	100	HabReg_2 WCA_5s94b/c
Noctule	<i>Nyctalus noctula</i>	2023	39	~280	100	HabReg_2 NERC_s41 WCA_5s94b/c
Serotine	<i>Eptesicus serotinus</i>	2019	2	~470	100	HabReg_2 WCA_5s94b/c
Soprano pipistrelle	<i>Pipistrellus pygmaeus</i>	2023	46	~280	100	HabReg_2 NERC_s41 WCA_5s94b/c
Mammals - Terrestrial						
Badger	<i>Meles meles</i>	2025	13	0	1000	PBA
Hedgehog	<i>Erinaceus europaeus</i>	2023	22	~145	1	NERC_S41
Otter	<i>Lutra lutra</i>	2023	4	~120	10	HabReg_2 NERC_s41 WCA_5s94b/

Table 2b. Species status key.

Abbreviation	Legislation
BOCC_red	Birds of Conservation Concern Red list – Globally threatened according to IUCN criteria; those whose population or range has declined rapidly in recent years; and those that have declined historically and not shown substantial recovery.
HabReg_2	Schedule 2 of Conservation of Habitats and Species Regulations 2010 (European Protected Species animal) – It is an offence (subject to exceptions) to deliberately capture, kill, disturb, or trade in the animals listed in Schedule 2.
NERC_s41	Priority Species listed under Section 41 of the Natural Environment and Rural Communities Act 2006.
PBA	Protection of Badgers Act 1992 – Badgers and their setts are protected; making it illegal to kill, injure or take, possess or cruelly ill-treat badgers or to interfere with a badger sett
WCA_1p1	Schedule 1 Part 1 of the Wildlife and Countryside Act 1981 (as amended) – Birds protected from disturbance at their nests, or their dependent young.

WCA_5s91k	Schedule 5 Section 9 Part 1 (taking) of the Wildlife and Countryside Act 1981 (as amended) – Animals which are protected from being intentionally killed or injured.
WCA_5s94b/c	Schedule 5 Section 9 Parts 4b/c of the Wildlife and Countryside Act 1981 (as amended) – Animals which are protected from intentional disturbance while occupying a structure or place used for shelter or protection / Animals which are protected from their access to any structure or place which they use for shelter or protection being obstructed.

6.1.4 Bat mitigation licences that have been granted within the last 10 years inside a 2km radius of the application site are detailed in **Table 3** below.

Table 3. Bat mitigation licences granted within a 2km radius (Source: MAGIC).

Case Reference of Granted Licence	Species on the Licence	Licensable Period	Licensable Works	Distance (m)
2016-27061-EPS-MIT	Brown long-eared bat Common pipistrelle	2017	Destruction of resting place	~635N
2017-28045-EPS-MIT	Daubenton's bat	2017-2022	Unknown	~910SE
2015-13539-EPS-MIT	Common pipistrelle	2015-2016	Destruction of resting place	~1410NW
2019-44194-EPS-MIT	Common pipistrelle Soprano pipistrelle	2020	Destruction of resting place	~1420SE
2017-29064-EPS-MIT	Soprano pipistrelle	2017-2027	Destruction of breeding roost	~1520NW
2018-33476-EPS-MIT	Serotine	2018-2023	Destruction resting place	~1770NE
2017-32379-EPS-MIT	Common pipistrelle	2017-2022	Damage & destruction of resting place	~1790S
2015-14137-EPS-MIT	Common pipistrelle Soprano pipistrelle	2015-2020	Destruction of resting place	~1810NW
2016-22301-EPS-MIT	Common pipistrelle	2016-2021	Damage & destruction of resting place	~1890SE
2020-44895-EPS-MIT 2020-44895-EPS-MIT-1	Brown long-eared bat Common pipistrelle Daubenton's bat Soprano pipistrelle	2020-2025	Destruction of resting place	~2000NE

6.2 Field Survey

Overview

- 6.2.1** The application site is a 0.17ha area at the Village Hotel Reading hotel. The area comprises the frontage of the hotel building with associated hard and soft landscaping.
- 6.2.2** The UK Habitat Classification (UKHab) habitats identified have been assigned condition and strategic significance in **Table 1** below; photographs are presented in **Appendix 1** and a plan of these baseline habitats for the biodiversity metric tool is illustrated in **Appendix 2**.

Table 1. Baseline habitats for the biodiversity metric tool.

Habitat Type (UKHab code) / Tree Reference (species)	Habitat Distinctiveness	Habitat Condition	Strategic Significance	Area (ha) / Tree Size	Habitat Units
Introduced shrub (u1~ 847)	Low	N/A	Low	0.0327	0.07
Developed land – sealed surface (u1b)	Very low	N/A	Low	0.14	0.00
Individual tree 32 (Himalayan birch)	Medium	Moderate	Low	Small	0.16
Individual tree 33 (blackthorn)	Medium	Moderate	Low	Small	
Individual tree 34 (Himalayan birch)	Medium	Moderate	Low	Small	
Individual tree 35 (Himalayan birch)	Medium	Moderate	Low	Small	
Individual tree 36 (Norway spruce)	Medium	Moderate	Low	Small	
Individual tree 37 (London plane)	Medium	Moderate	High (TPO)	Very large	0.64
Individual tree 38 (common lime)	Medium	Moderate	High (TPO)	Small	
Total				0.17	0.87

u1~ 847 Introduced shrub

- 6.2.3** The soft landscaping includes formally clipped box hedges (*Buxus sempervirens*), Yucca plants (*Yucca* sp.) and mixed shrub beds comprising Choisya (*Choisya* sp.) and bamboo (*Bambusoideae* sp.) (**Photograph 1**). Brambles (*Rubus fruticosus* agg.) and other scrub and ruderal vegetation is growing throughout the shrub beds, such as common nettle (*Urtica dioica*), great willowherb (*Epilobium hirsutum*), cleavers (*Galium aparine*), creeping thistle (*Cirsium arvense*) and wood avens (*Geum urbanum*). This urban habitat is a low distinctiveness habitat which cannot be assigned a condition. As

a result, the habitat has been assigned low strategic significance.

u1b Developed land – sealed surface

6.2.4 The developed land on site comprises the frontage of the hotel and hard landscaping, such as asphalt and brick paving (**Photograph 2**). This urban habitat is a very low distinctiveness habitat which cannot be assigned a condition. As a result, the habitat has been assigned low strategic significance.

6.2.5 The frontage of the hotel building possessed limited potential bat roost features at the first floor level (**Photograph 3**). A broken roof tile was at the location of the proposed extension but was of limited extent and suitability for roosting bats and considered to be of negligible suitability for roosting bats (**Photograph 4**).

Individual trees (32-36)

6.2.6 The soft landscaping in the mixed shrub beds on the eastern side of the site includes a small Himalayan birch (*Betula jacquemontii*) (32) and blackthorn (*Prunus spinosa*) (33) (**Photograph 5**); a pair of small Himalayan birch (*B. jacquemontii*) (34 & 35) (**Photograph 6**); and a Norway spruce (*Picea abies*) (36). The habitat condition of these urban trees has been assessed as poor (see habitat condition assessment sheets); the trees are not of ecological value beyond the scale of the site and are not identified within any strategic green infrastructure policies, therefore have been assigned low strategic significance.

Individual trees (37 & 38)

6.2.7 There was a very large London plane (*Platanus x hispanica*) (37) and a small common lime (*Tilia x europea*) (38) in the central part of the site (**Photograph 7**). The habitat condition of these urban trees has been assessed as moderate (see habitat condition assessment sheets); the trees are part of a Tree Preservation Order (TPO) so have been assigned high strategic significance.

7 POST-DEVELOPMENT DESIGN

7.1 Proposed Habitats

- 7.1.1 The proposed habitats derived from the proposed landscaping plan are listed in **Table 2** and described below. A plan of these proposed habitats for the Statutory Biodiversity Metric calculation is illustrated in **Appendix 3**.

Table 2. Proposed habitats for the biodiversity metric tool.

Habitat Type (UKHab code) / Tree Reference (species)	Habitat Distinctiveness	Habitat Condition	Strategic Significance	Area (ha) / Tree Size	Habitat Units
Introduced shrub (u1~ 847)	Low	N/A	Low	0.036	0.07
Developed land – sealed surface (u1b)	Very low	N/A	Low	0.1363	0.00
Artificial unvegetated, unsealed surface (u1c)	Very low	N/A	Low	0.0004	0.00
Façade-bound green wall	Low	Poor	Low	0.0022*	0.01
Individual tree 32 (Himalayan birch)	Medium	Moderate	Low	Small	0.13
Individual tree 33 (blackthorn)	Medium	Moderate	Low	Small	
Individual tree 34 (Himalayan birch)	Medium	Moderate	Low	Small	
Individual tree 35 (Himalayan birch)	Medium	Moderate	Low	Small	
Individual tree 36 (Norway spruce)	Medium	Moderate	Low	Small	
Individual tree 37 (London plane)	Medium	Moderate	High (TPO)	Very large	0.64
Individual tree 38 (common lime)	Medium	Moderate	High (TPO)	Small	
11x individual trees (birch)	Medium	Poor	Low	Small	0.13
Total (*green façade not included in total area)				0.17	0.98

u1~ 847 Introduced shrub

- 7.1.2 The soft landscaping proposals result in a net increase of introduced shrub on site.

u1b Developed land – sealed surface

- 7.1.3 The proposed studio extension and increase in soft landscaping results in a small net decrease of developed land on site.

u1c Artificial unvegetated, unsealed surface

- 7.1.4** A small section of introduced shrub is to be replaced by gravel beneath the frontage of the hotel building.

Façade-bound green wall

- 7.1.5** The proposed studio extension will feature green walls covering an area of 22m².

Individual trees (32-38)

- 7.1.6** A Himalayan birch (*B. jacquemontii*) (35) will be removed to facilitate the proposals; the remaining trees will be retained.

- 7.1.7** Eleven small ornamental birch trees will be planted as part of the soft landscaping proposals.

7.2 Biodiversity Metric Result

- 7.2.1** The Statutory Biodiversity Metric calculation tool (enclosed separately) demonstrates the feasibility of delivering a minimum 10% net gain for biodiversity. The biodiversity metric tool shows that the landscaping proposals will deliver a total net change of 12.15% in habitat units – see the final results section in **Figure 1** below.

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	0.11
	<i>Hedgerow units</i>	0.00
	<i>Watercourse units</i>	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	12.15%
	<i>Hedgerow units</i>	0.00%
	<i>Watercourse units</i>	0.00%
Trading rules satisfied?	Yes ✓	

Figure 1. The Statutory Biodiversity Metric Final Results.

8 DISCUSSION

8.1 Designated Sites for Nature Conservation

Evaluation of Baseline

- 8.1.1** The desk study revealed that the application site is not statutorily or non-statutorily designated for its wildlife interest and therefore is not currently recognised as being of international, national or county level conservation significance. The desk study data included two locally designated non-statutory sites within a 1km radius of the application site; the closest was Warren Woodlands Complex Local Wildlife Site (LWS) approximately 400m away on the other side of the River Thames.

Impact Assessment

- 8.1.2** Considering the nature, scale and distance of the redevelopment, no adverse effects are anticipated on the locally designated non-statutory sites.

8.2 Habitats

Evaluation of Baseline

- 8.2.1** The application site is a 0.17ha area at the Village Hotel Reading, comprising the frontage of the hotel with associated hard and soft landscaping. Most of the site constitutes urban habitats (i.e. buildings and hard standing) of very low distinctiveness; but the soft landscaping on site is well-established, comprising introduced shrub and mature trees (including specimens covered by a Tree Preservation Order), and therefore holds site level ecological value.

Impact Assessment

- 8.2.2** The redevelopment proposals do not result in the loss of any priority habitats or habitats with importance beyond the site level. The proposals are subject to mandatory Biodiversity Net Gain (BNG) because 59m² of introduced shrub and a Himalayan birch (35) are to be removed. The biodiversity metric tool has been used to demonstrate that a 12.15% net gain can be achieved as part of the proposed development; for project implementation and habitat management proposals refer to **Section 9.2**.
- 8.2.3** The mature trees on site are to be retained and should be protected from damage during construction – refer to **Section 9.3**.

8.3 Bats

Evaluation of Baseline

- 8.3.1** The desk study data included records of at least eight species of bat within a 1km radius of the application site. Furthermore, 10 bat mitigation licences have been granted within the last 10 years inside a 2km radius of the application site, covering brown long-eared bat, common pipistrelle, Daubenton's bat, serotine and soprano pipistrelle (including a breeding colony).
- 8.3.2** No evidence of bat presence and no potential roost sites were identified in relation to the frontage of the hotel that is to be impacted by the proposed studio extension.
- 8.3.3** The application site offers potential flight paths and foraging habitats for bats adapted to an urbanised setting, particularly with the mature London planes in the wider hotel grounds which connect to the River Thames to north.

Impact Assessment

- 8.3.4** The development proposals will maintain the potential flight paths and foraging habitats on site. The use of the site for the hotel will not change so it is unlikely that there will be any significant change in light levels. However, the proposed development should incorporate a sensitive lighting scheme to improve the potential flight paths and foraging habitats on site – refer to **Section 9.4**. There are opportunities to enhance the site for bats – refer to **Section 9.7**.

8.4 Great Crested Newt (and other amphibians)

Evaluation of Baseline

- 8.4.1** The desk study data included no recent GCN records within a 1 kilometre radius of the application site and no bodies of standing water that could potentially support breeding GCN (or other notable amphibians) have been identified on OS mapping within a 250m radius. The site and immediate urban setting lack optimal terrestrial habitat for amphibians and the river Thames is a major barrier to GCN and other amphibians to the north of the site.

Impact Assessment

- 8.4.2** The risk of GCN presence on site is extremely low and therefore no adverse effects on this species are anticipated.

8.5 Hazel Dormouse (and other terrestrial mammals)

Evaluation of Baseline

8.5.1 The desk study data included no recent hazel dormouse records within a 1km radius of the application site and a search of MAGIC for granted EPS licence applications returned none inside a 2km radius. Furthermore, the application site and the immediate urban setting have no suitable habitat for dormice. Therefore, the presence of hazel dormouse on site is considered highly unlikely.

8.5.2 The desk study data included recent badger records within a 1km radius of the application site. However, no evidence of badger activity (i.e. setts, trails, snuffle holes or mammal diggings) was identified on site and the immediate urban setting lacks suitable habitat for badgers. Therefore, the presence of badger on site is considered highly unlikely.

8.5.3 Hedgehog – a priority species – has been recorded locally and could forage and take cover on site within the patches of introduced shrub.

Impact Assessment

8.5.4 The risk of hazel dormouse and badger presence on site is extremely low and therefore no adverse effects on this species are anticipated.

8.5.5 The development proposals will maintain opportunities for hedgehogs to forage and take cover on site. Precautionary measures should be adopted to prevent injury/death of sheltering hedgehogs – refer to **Section 9.5**. Furthermore, there are opportunities to enhance the site for hedgehogs – refer to **Section 9.7**.

8.6 Reptiles

Evaluation of Baseline

8.6.1 The desk study data included recent reptile records within a 1 kilometre radius of the application site. The site lacks structural diversity to support common and widespread reptiles and the immediate urban setting lacks suitable habitat for reptiles and creates barriers to their dispersal. Therefore, the presence of reptiles on site is considered highly unlikely.

Impact Assessment

8.6.2 The risk of reptile presence on site is extremely low and therefore no adverse effects on this species are anticipated.

8.7 Birds

Evaluation of Baseline

- 8.7.1** The desk study data included recent records of protected and/or notable bird species within a 1km radius of the application site, but the site is considered unlikely to support such species. The patches of introduced shrub provide limited nesting opportunities only for common and widespread birds of urban areas, such as the feral pigeon; no evidence of nesting birds in the tree canopies was identified during the survey.

Impact Assessment

- 8.7.2** A precautionary method of working would enable compliance with legislation protecting nesting birds – refer to **Section 9.6**. Furthermore, there are opportunities to enhance the site for birds – refer to **Section 9.7**.

8.8 Invertebrates

Evaluation of Baseline

- 8.8.1** The desk study data included recent records of three priority species within a 1km radius of the site, including stag beetle. The soft landscaping does not offer suitably diverse habitats of native species to support an important assemblage of invertebrates or any deadwood suitable for stag beetles.

Impact Assessment

- 8.8.2** The proposed development will not impact a site important for invertebrates but there are opportunities for enhancements for priority species, such as stag beetle – refer to **Section 9.6**.

8.9 Invasive Non-native Species

Evaluation of Baseline

- 8.9.1** No plants listed as an invasive species under Schedule 9 of the Wildlife and Countryside Act 1981 have been recorded on site.

Impact Assessment

- 8.9.2** The proposed development will increase the area of soft landscaping – refer to **Section 9.7**.

9 RECOMMENDATIONS

9.1 Overview

- 9.1.1** This chapter provides details regarding proposed avoidance, mitigation, compensation and enhancement measures, including measures to enable legislative compliance.

9.2 Biodiversity Net Gain

Project Implementation

- 9.2.1** It is Government guidance that BNG provision involving significant on-site enhancements must be legally secured for a minimum of a minimum 30-year period, and subject to a Habitat Management and Monitoring Plan (HMMP). Although the proposed tree planting represents medium distinctiveness habitat, due to the small number of biodiversity units created this approach is considered disproportionate.
- 9.2.2** The on-site enhancements – i.e. creation of introduced shrub, small urban trees and façade-bound green wall – take between 1 to 10 years to achieve target condition. Therefore, it is considered likely that the management and monitoring of the proposed habitat enhancement can be sufficiently detailed in this document and secured by an appropriately worded planning condition.

Habitat Management

- 9.2.3** The eleven newly planted trees would require minimal management and maintenance beyond the initial planting and care. Each tree should be mulched to suppress competition from weeds using locally sourced wood chips (the use of compost or plastic mulch should be avoided). The trees should be given an initial soak with water and should only be watered again in a period of drought if necessary.
- 9.2.4** Stakes and ties will be used to support the newly planted trees and will be inspected monthly and adjusted/replaced as necessary; the use of plastic spirals and tree guards will be avoided. The trees will be firmed in after strong winds or heavy frosts as necessary. Tree health will be assessed monthly in the first year and replacement trees planted if any fail.

9.3 Habitat Protection Measures

9.3.1 The mature trees on site will be protected during construction. The following protection measures are recommended:

- Erection of Heras fencing in advance of site clearance, enclosing Root Protection Areas (RPAs);
- Prohibition of construction activities, material storage, use of vehicles, fires etc. within the fenced RPAs to prevent damage to tree roots and soil compaction; and
- Machinery must be careful when moving through the site to ensure no branches in the canopy are damaged.

9.4 Bats (Sensitive Lighting)

9.4.1 During construction, artificial lighting should be kept to a minimum and if security lighting is required, this should be controlled by passive infrared motion sensors.

9.4.2 In the long-term, external lighting should be avoided wherever possible but if essential, factors such as column height, light source, use of passive infrared motion sensors and light spillage should be considered carefully when designing the lighting. If lighting is required, lighting with low or no UV content, i.e. warm white LED lamps (2700K or below), should be used in place of mercury and metal halides and luminaires or other directional light accessories should be used to ensure that light spillage onto the mature trees is avoided (BCT and ILP, 2023). Turning off lighting at night will avoid extended periods of time when areas would be lit, and this can be tailored to suit human health and safety as well as wildlife needs.

9.5 Precautionary Avoidance Measures

9.5.1 The following reasonable avoidance measures are recommended to minimise the risk of injury/death of hedgehogs during construction activities:

- Any removal of logs, debris or leaf litter will be carefully searched by hand;
- Any stored building materials or waste, such as bricks or debris etc., that might offer shelter for animals will be kept raised off the ground on pallets or on existing hard standing, and efforts should be made to process and remove from site as soon as possible; and
- Excavation works will be avoided after dusk and any open excavations or trenches will be backfilled (after a check for animal presence) or left with escape ramps to prevent animals from becoming trapped.

9.6 Nesting birds

- 9.6.1** Any vegetation clearance should be completed outside of the peak bird nesting season (March to August) or alternatively, following an inspection by an ecologist confirming that there is no current nesting activity. If nesting birds are discovered prior to or during any work, work should stop immediately and should only continue once bird nesting has finished, i.e. young have fledged and left the nest.

9.7 Biodiversity Enhancement Opportunities

- 9.7.1** The planning proposals provide opportunities for the enhancement of the site's biodiversity value. The inclusion of the following recommendations would be of ecological benefit and be in line with the National Planning Policy Framework (NPPF) and local planning policy:

- Stag beetle loggeries;
- Wildlife friendly landscaping;
- Woodcrete bat and bird boxes; and
- Ensuring ecological permeability for hedgehogs.

10 REFERENCES

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Natural England (2011). *Interim Natural England Advice Note - Dormouse surveys for mitigation licensing – best practice and common misconceptions*. Natural England.

UKHab Ltd (2023). *UK Habitat Classification Version 2.0* (at <https://www.ukhab.org>)

Appendix 1

APPENDIX 1 – SITE PHOTOGRAPHS



1. Introduced shrub (u1~ 847).



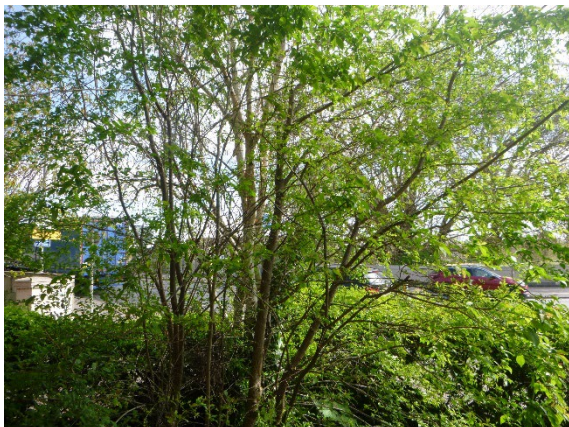
2. Developed land – sealed surface (u1b).



3. Location of proposed studio extension.



4. Broken roof tile (negligible suitability for roosting bats).



5. Individual trees (32 & 33).



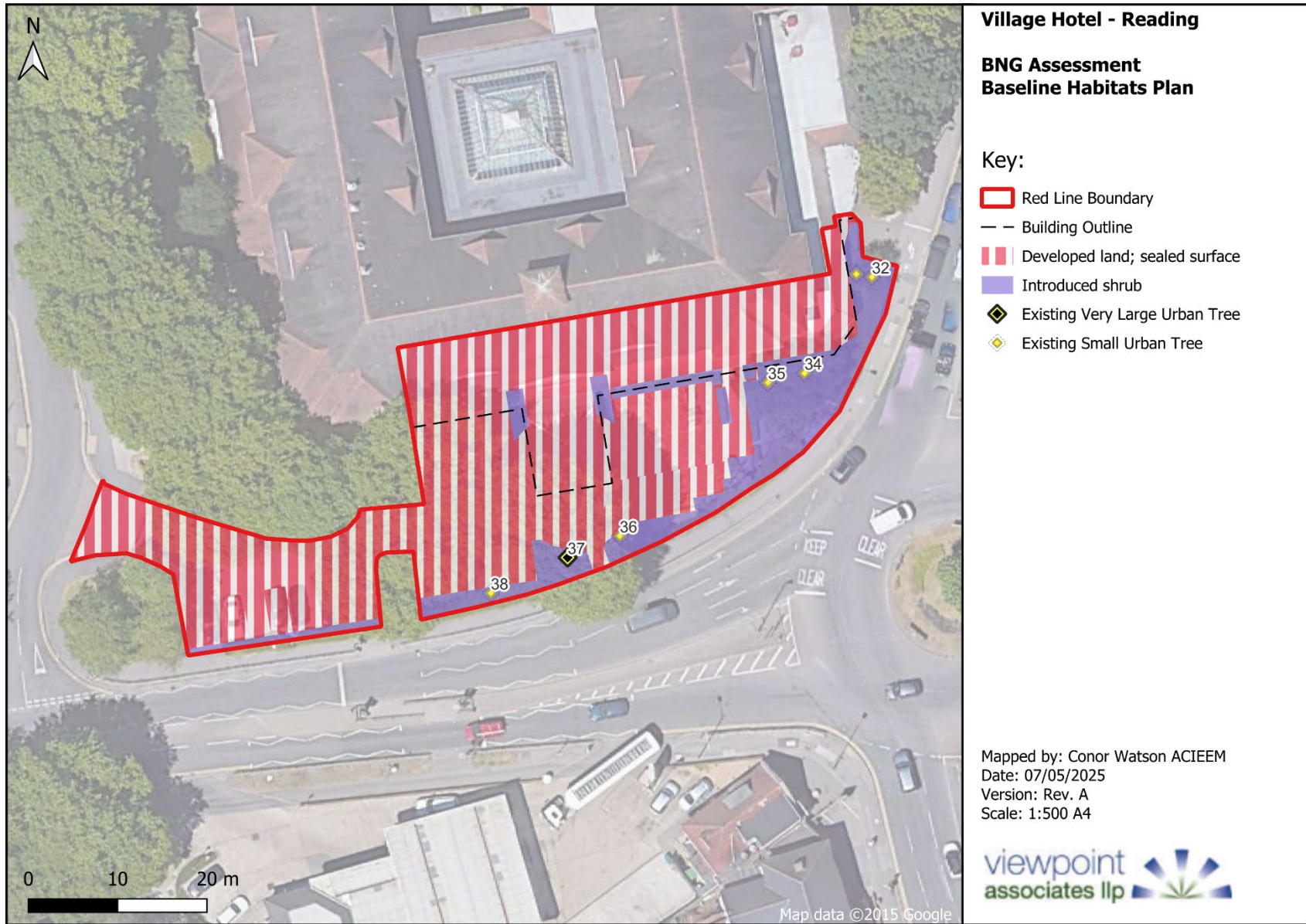
6. Individual trees (34 & 35).



7. Individual tree (37).

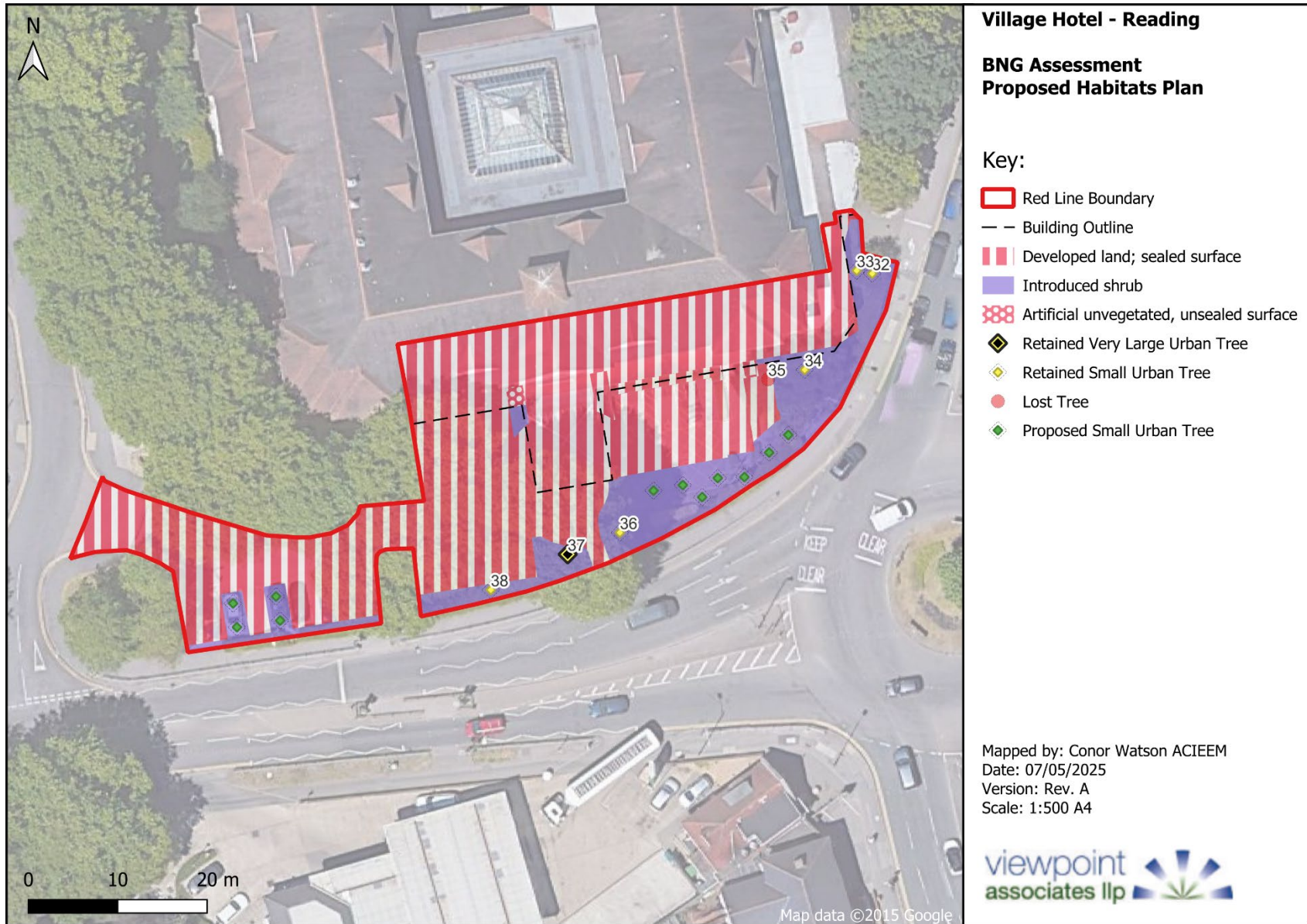
Appendix 2

APPENDIX 2 – BASELINE HABITATS PLAN



Appendix 3

APPENDIX 3 – PROPOSED HABITATS PLAN



Appendix 4

APPENDIX 4 – PROTECTED SPECIES LEGISLATION

Bats

In England and Wales, all bat species and their roosts are legally protected under the Wildlife and Countryside Act (1981) (as amended); the Countryside and Rights of Way Act, 2000; the Natural Environment and Rural Communities Act (NERC, 2006); and by the Conservation of Habitats and Species Regulations (2017) (as amended). You will be committing a criminal offence if you:

- Deliberately capture, injure or kill a bat
- Intentionally or recklessly disturb a bat in its roost or deliberately disturb a group of bats
- Damage or destroy a bat roosting place (even if bats are not occupying the roost at the time)
- Possess or advertise/sell/exchange a bat (dead or alive) or any part of a bat
- Intentionally or recklessly obstruct access to a bat roost

Barbastelle, Bechstein's, greater horseshoe, lesser horseshoe, brown long-eared, soprano pipistrelle, and noctule bats are all priority species under the UK Biodiversity Action Plan (UK BAP) and have also been adopted as species of principal importance in England under Section 41 of the NERC Act 2006.

Badgers

Badgers and their setts are afforded strict protection under the Protection of Badgers Act 1992. This Act consolidates past badger legislation and, in addition to protecting the badger itself, makes it an offence to damage, destroy or obstruct badger setts. Badgers are also protected under Schedule 6 of the Wildlife and Countryside Act 1981 (as amended), and listed under Appendix III of the Bern Convention, as a species that is in need of protection but may be hunted in exceptional instances. Only badger setts that are currently in use are covered by wildlife legislation.

Birds

All wild birds in the UK are protected under Section 1 of the Wildlife and Countryside Act 1981 (as amended) which makes it an offence to intentionally kill, injure or take any wild bird or to take, damage or destroy the nest or its eggs.

Some bird species, such as the barn owl *Tyto alba*, are listed in Schedule 1 of the 1981 Act and receive further protection, making it an offence to intentionally or recklessly disturb these birds whilst building a nest or in, on or near a nest containing eggs or young; or to disturb dependent young of such a bird.

The NERC Act (2006) inserts a new schedule into the Wildlife and Countryside Act (1981) to protect the nests of some bird species that regularly re-use their nests, even when the nests are not in use. This protection currently applies to golden eagle, white-tailed eagle and osprey.

Reptiles

All British reptiles are listed under schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and are therefore protected from intentional killing or injury. This is largely as a consequence of a national decline in numbers associated with habitat loss.

Two scarcer native British reptiles (smooth snake *Coronella austriaca* and sand lizard *Lacerta agilis*), are afforded 'full' protection. This legislation makes it an offence to intentionally or recklessly kill, injure, disturb, take, possess or sell these species (in all life stages). It is also illegal to damage, destroy or obstruct access to places they use for breeding, resting, shelter and protection.

All species of reptile are priority species in the UKBAP and have been adopted as Species of Principal Importance under Section 41 of the NERC Act (2006) in England (Section 42 in Wales).

Amphibians

Great crested newts (GCN's) *Triturus cristatus* and their habitats are fully protected by the Conservation of Habitats and Species Regulations (2017) (as amended) and partially protected under the Wildlife and Countryside Act 1981 (as amended). This legislation makes it an offence to kill, injure or capture GCN's, their young or eggs, or destroy / damage their ponds or places of shelter used for breeding or protection. The great crested newt is also a Priority species in the UK Biodiversity Action Plan (UKBAP), and had been adopted as a Species of Principle Importance in England under Section 41 of the NERC Act 2006.

The natterjack toad *Epidalea calamita* is fully protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and Schedule 2 of The Conservation of Habitats and Species Regulations 2017 making it a European Protected Species. The natterjack toad is also a priority species under the UK Biodiversity Action Plan.

The pool frog *Rana lessonae* is protected under the Conservation (Natural Habitats &C.) Regulations 2017 (as amended). As a European protected species the deliberate capturing, disturbing, injuring or killing of this species is prohibited, as is damage or destruction of its breeding sites or resting places. The pool frog is also a priority species under the UK Biodiversity Action Plan due to a 100% decline over 25 years (1980-2005).

Common toads *Bufo bufo* are also designated UKBAP species due to a serious decline of populations across large areas of southern, eastern and central England, thought to be mainly due to changes in habitat management, mortalities on the roads, and climate change.

Dormice

Common dormice *Muscardinus avellanarius* and their habitats are fully protected by both the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations (2017) (as amended). This legislation makes it an offence to kill, injure, disturb or capture dormice, or destroy or obstruct their resting or breeding places.

The dormouse is also a priority species under the UK Biodiversity Action Plan and has been adopted as a species of Principal Importance in England under Section 41 of the NERC Act 2006 (section 42 in Wales) and so is protected from any adverse effects as a result of development.

Otters

Otters *Lutra lutra* are protected by both the Wildlife and Countryside Act 1981 (as amended) and The Conservation of Habitats and Species Regulations 2017 (as amended). This legislation makes it illegal to; deliberately or recklessly kill, injure or capture an otter, deliberately or recklessly disturb or harass an otter, damage, destroy or obstruct access to a breeding site or resting place of an otter.

The otter is also a UK BAP Priority Species and has been adopted as a Species of Principal Importance in England under Section 41 of the NERC Act 2006 (Section 42 in Wales) and the Conservation (Scotland) Act in Scotland.

Water Voles

Water voles *Arvicola terrestris* are fully protected under the Wildlife and Countryside Act 1981 (as amended). This legislation makes it an offence to kill or injure water voles, and to damage, destroy or obstruct access to places used for protection or shelter, and to disturb water voles whilst they occupy such a place.

The water vole is also a Priority species in the UK Biodiversity Action Plan, and had been adopted as a Species of Principle Importance in England under Section 41 of the NERC Act 2006.

White-clawed Crayfish

The white-clawed crayfish *Austropotamobius pallipes* is protected under the Wildlife and Countryside Act 1981 (as amended), making it a criminal offence to; intentionally or recklessly kill or injure a white-clawed crayfish, or sell or attempt to sell any part of this species. The Habitats Regulations (2017) (as amended) provide further protection through the declaration of Special Areas of Conservation (SAC). This protection aims to prevent commercial harvesting of white-clawed crayfish and prohibits their capture without a licence.

The white-clawed crayfish is also a Priority species in the UK Biodiversity Action Plan (BAP), and has been adopted as a Species of Principal Importance in England under Section 41 of the NERC Act 2006.

Hedgehogs

Hedgehogs are UK Biodiversity Action Plan (BAP) species, and therefore must be taken into consideration as part of development planning. A recent report (Wembridge, 2011) shows that hedgehog numbers have declined by 25% in the last ten years.

Appendix 5

APPENDIX 5 – SURVEY AND REPORTING LIMITATIONS AND EXCEPTIONS

This report and its survey results should be considered in conjunction with the terms and conditions proposed and scope of works agreed between Viewpoint Associates LLP and the client.

This report has been produced in the context of the proposals stated in the Introduction & Background section of this report and should not be used in any other context.

Viewpoint Associates LLP have endeavored to identify the likely presence / absence of protected species wherever possible on site, where this falls within the agreed scope of works. Current standard methodologies have been used, which are accepted by Natural England and other statutory conservation bodies. No responsibility can be accepted where these methodologies fail to identify all species or significant species on site.

Extended Phase 1 and Preliminary Ecological survey techniques provide a preliminary assessment of the likelihood of protected species occurring on the development site, based on the suitability of the habitats and any field signs found during the site visit. A Phase 1 survey should not be taken as providing a full and definitive survey of any protected species group.

Extended Phase 1 and Preliminary Ecological Appraisals (PEA) represent a snapshot of conditions at the time of survey and are limited by factors which affect the presence of plants and animals such as the time of year, migration patterns and behaviour. Surveys should therefore not be considered a comprehensive list of all plant species or as conclusive proof that certain protected species are not present or will not be present in the future.

Where the presence/absence of a certain species is in question our ecologists must apply a precautionary approach until further survey data can be sought to better inform the decision.

Viewpoint Associates LLP will advise on the optimum survey season for a particular habitat or protected species prior to undertaking the survey work. Viewpoint Associates LLP cannot accept responsibility for the accuracy of surveys undertaken outside this period.

The Impacts, Mitigation and Enhancements section of the report provides an overview and is for guidance only. This section should not be solely relied upon but should be considered in the context of the whole report.

Interpretations of survey results and recommendations outlined in the report represent our professional opinions, expressed in accordance with recognised industry practices and current legislation at the time of reporting. The results of survey work undertaken by Viewpoint Associates LLP are representative at the time of surveying.

Where the client had supplied us with data from previous reports, it has been assumed that this information is valid. No responsibility can be accepted by Viewpoint Associates LLP for inaccuracies within any previous data supplied.

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Amendments to this report after its submission may be necessary in light of new, relevant information and / or legislation. This report should be referred to us for re-assessment if any such amendments are necessary or after the expiry of one year from the date of the report.