



**New Yard Areas, Land at Eton Business Park, Eton Hill
Road, Radcliffe**

Preliminary Ecological Appraisal Report

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1. Introduction

Background

- 1.1. Elton Ecology Ltd was commissioned by Hamilton Heath Estates Ltd to conduct a Preliminary Ecological Appraisal (PEA) of the site known as New Yard Areas, Land at Eton Business Park, Eton Hill Road, Radcliffe.
- 1.2. The present Preliminary Ecological Appraisal Report (PEAR) has been prepared by Consultant Ecologist PH BSc (Hons), MSc. PH holds a Natural England Level 1 Bat Licence (CL17) (reference number: 2021-54491-CLS-CLS) and a Natural England Level 1 Great Crested Newt Licence (CL08) (reference number: 2022-10461-CL08-GCN) and a botanical Field Identification Skills Certificate (FISC) Level 3. PH has attended formal training in UKHab survey, Biodiversity Net Gain, and botanical species identification. PH is a Qualifying member of CIEEM and is experienced in assisting and undertaking ecology surveys, GIS mapping, and report writing.

Site description

- 1.3. The site comprises areas of developed land, grassland, and dense scrub, bordered by a treeline to the north. The site is located at Eton Business Park, Eton Hill Road, Radcliffe, M26 2ZS (Figure 1: Site Location Plan) (central OS grid reference: SD 79477 08550).

Development Proposals

- 1.4. The development proposals include the construction of a new industrial yard area with 17 new units.
- 1.5. Relevant documents used to inform the assessment include:
 - Proposed Layout SK04 Compound 02 (Contract No. 3614, Drawing No. 05) (CJ Partnership, December 2023).

Report Purpose and Scope

- 1.6. With reference to the Development Proposals, the purpose and scope of the present report is to:
 - Identify key ecological constraints associated with the project.
 - Identify avoidance, mitigation or compensation measures likely to be required in accordance with the mitigation hierarchy.
 - Identify any additional surveys that may be required to inform the above.
 - Identify likely opportunities to deliver ecological enhancement.

Planning Policy and Legislation

- 1.7. A summary of biodiversity planning policies and wildlife legislation relevant to the site is provided in Appendix 1: Planning Policy and Legislation Summary. The relevant planning policy and legislation includes:
 - National Planning Policy Framework (NPPF) 2023.
 - Government Circular ODPM 06/05 Biodiversity and Geological Conservation.

- The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.
- The Wildlife and Countryside Act 1981 (as amended).
- Natural Environment and Rural Communities (NERC) Act 2006 – Habitats and species of principal importance.
- The Hedgerow Regulations 1997;
- Protection of Badgers Act 1992; and
- The Wild Mammals (Protection) Act 1996 (as amended).

1.8. A summary of the key local planning policy and other relevant documents is provided in Table 2 below.

Table 1 Key Local Planning Policy and Relevant Documents

Document	Relevance
Places for Everyone Joint Development Plan 2022 to 2039	Policy JP-G8: A Net Enhancement of Biodiversity and Geodiversity <i>'Through local planning and associated activities a net enhancement of biodiversity resources will be sought...</i> <i>Development will be expected to:</i> <i>a. Follow the mitigation hierarchy...</i> <i>b. Avoid fragmenting or severing connectivity between habitats;</i> <i>c. Achieve a measurable net gain in biodiversity of no less than 10%</i> <i>....</i> <i>f. Development proposals should be informed by the findings and recommendations of the appropriate biodiversity/ecological assessment(s).'</i>
Greater Manchester Biodiversity Action Plan	Relevant species: • Bats • Great crested newts • Hares

2. Methodology

Assessment

- 2.1. The present assessment has been carried out with reference to best practice guidelines for Preliminary Ecological Appraisal provided by the Chartered Institute of Ecology and Environmental Management (CIEEM, 2017).

Personnel

- 2.2. The Extended UKHab Survey was carried out by Consultant Ecologist PH BSc (Hons), MSc. See Introduction for relevant competencies and training.
- 2.3. The Extended UKHab Survey was assisted by Assistant Ecologist CM BSc (Hons), MSc. CM has attended formal training in UKHab survey, Biodiversity Net Gain, and botanical species identification. CM is a Qualifying member of CIEEM and is experienced in assisting and undertaking ecology surveys, GIS mapping, and report writing.

Desk Study

- 2.4. The sources of information and study areas of the desk study data are provided in Table 3.

Table 2: Desk study sources and areas

Feature		Study Area	Data Source	Date of Search
Designated sites of nature conservation	International (e.g. Special Area of Conservation, Special Protection Area, and Ramsar)	10 km radius of the site boundary	UK Government MAGIC ¹ website	22/03/2024
	National (e.g. Site of Special Scientific Interest (SSSI), SSSI Impact Risk Zones (SSSI IRZ)), Local Nature Reserves, National Nature Reserves	5 km radius of the site boundary		
Non-Statutory Designated Sites, Protected/ Notable Species & Invasive Non-Native Species		1 km radius of the centre of the site	Greater Manchester Local Records Centre	Received 23/04/2024
Granted Natural England Mitigation Licences		2 km radius of the site boundary	UK Government MAGIC website	22/03/2024
Natural England Ancient Woodland Inventory		Site & 1 km radius of the site boundary		
Natural England Priority Habitat Inventory		Site & 1 km radius of the site boundary		
The site in the context of habitat connectivity to the surrounding landscape		2 km radius of the site boundary	Satellite and OS map data	

¹ Multi-agency Geographic Information for the Countryside: www.magic.gov.uk.

Feature	Study Area	Data Source	Date of Search
Relevant ecological information used to inform other planning applications	Site & surrounding area	LPA planning portal - Bury Council	

Field Survey

UKHab Habitat Survey

- 2.5. The UKHab Habitat survey was carried out on the 27th March 2024 and was extended to include an assessment for Natural Environment and Rural Communities Act (2006) Section 41 Habitats of Principal Importance (HPI) and of the sites potential to be used by protected or notable species as described below. The study area included the site boundary and a 30m radius for evidence of mobile protected species such as badger, access permitting. Weather conditions were appropriate for field survey with temperatures of 9°C, no rain, and good visibility.
- 2.6. The site was walked over, and botanical species lists of representative and notable plant species for each habitat type were recorded. Habitats were classified and mapped with reference to best practice guidelines from UKHab Ltd (2023). The nomenclature used for botanical species lists broadly follows that of Stace (2019). Protected or notable plant species were recorded where observed.

Amphibians (Including Great Crested Newt)

- 2.7. The habitats at the site were assessed for their suitability to support amphibians, including a search of the site for ponds and suitable terrestrial habitat. The desk study included a search of ponds within a 250m radius of the site.
- 2.8. The HSI was carried out with reference to Oldham *et al.* (2000), and as refined by ARG UK, (2010). The HSI provides a numerical index between 0 and 1, whereby 0 indicates unsuitable habitat and 1 indicates optimal habitat. Ten habitat variables 'Suitability Indices (SI)' are assessed, which are known to affect the suitability of a pond for the species, as follows:
- Geographic Location (SI₁)
 - Pond area (SI₂)
 - Permanence (SI₃)
 - Water Quality (SI₄)
 - Shade (SI₅)
 - Waterfowl (SI₆)
 - Fish (SI₇)
 - Pond Count (SI₈)
 - Terrestrial habitat (SI₉)
 - Macrophytes (SI₁₀)
- 2.9. The habitat variables are each assigned a numerical score. The HSI score is then a geometric mean of the ten suitability indices: $HSI = (SI_1 \times SI_2 \times SI_3 \times SI_4 \times SI_5 \times SI_6 \times SI_7 \times SI_8 \times SI_9 \times SI_{10})^{1/10}$
- 2.10. The HSI score result (i.e. the numerical index between 0 and 1) is categorised according to the pond suitability scale presented in Table 4.

Table 3: Pond Suitability Scale for Habitat Suitability Index (HSI)

HSI Score	Pond Suitability
<0.5	Poor
0.5-0.59	Below Average
0.6-0.69	Average
0.7-0.79	Good
>0.8	Excellent

- 2.11. There is a general positive correlation between HSI scores and GCN presence. HSI scores are useful as a guide, however this relationship is not sufficiently strong to determine GCN presence/ likely absence.

Badger

- 2.12. The badger walkover survey included a search for evidence of badger at the site, such as sett entrances (normally 25 to 35cm wide and shaped like a 'D' on its flat edge), large spoil heaps outside sett entrances, bedding, footprints, mammal paths, latrines, hairs, scratching posts, and signs of digging for food or 'snuffle holes'. The survey included a search of the site and 30m radius (access permitting) for badger setts.

Bats – Ground Level Tree Assessment

- 2.13. The preliminary Ground Level Tree Assessment (GLTA) was carried out with reference to best practice industry guidelines (Collins, 2023). The study area included all trees within the survey area.
- 2.14. The survey included a surveyor assessing the tree(s) from ground level aided by binoculars, noting potential bat entry/exit points, potential roosting features (PRFs), and any evidence of bats. The trees were graded for their suitability to support roosting bats, which will inform the need for further survey effort, if required, such as a potential roost feature (PRF) inspection via rope and harness access and/or nocturnal survey.
- 2.15. The suitability of the trees for roosting bats was then categorised with reference to best practice industry guidelines (Collins, 2023) (Table 5) as either none, further assessment required (FAR), potential roosting features present for individual bats (PRF-I), or potential roosting features present for multiple bats (PRF-M), which informs the need for further survey effort to establish the presence/ likely absence of roosting bats.

Table 4: Guidelines for Assessing the Potential Bat Roosting Suitability of Trees (Adapted from Collins, (2023))

Suitability	Description of Trees
None	No features likely to be used by roosting bats or highly unlikely features are present. An absence of accessible voids, cracks and crevices.
FAR	Further assessment is required to determine if features likely to be used by roosting bats are present.
PRF-I	The PRF is suitable for individual or small numbers of bats due to lack of size or suitable surrounding landscape.
PRF-M	The PRF is suitable for multiple bats and may be used by a maternity colony.

Bats - Preliminary Roost Assessment

- 2.16. The Preliminary Roost Assessment (PRA) was carried out on the 27th March 2024 with reference to best practice guidelines (Collins, 2023).
- 2.17. The survey involved a Natural England bat licenced surveyor making a detailed external and internal inspection of the building(s) on-site, compiling information on potential bat entry/exit points, roosting features, and any evidence of bats found (such as actual bat sightings, droppings, urine staining and fur-oil staining). The nomenclature used for bat species lists broadly follows that of Dietz and Kiefer (2018).
- 2.18. The PRA was aided as required by binoculars, a high-powered torch, and an endoscope to view features on the building and/ or search accessible cracks and crevices for the presence of bats where required.
- 2.19. The suitability of the building(s) for roosting bats was categorised with reference to best practice industry guidelines (Collins, 2023) (Table 6: Guidelines for Assessing the Potential Bat Roosting Suitability of Structures and Trees) as either negligible, low, moderate, or high. Suitability grading of buildings requires consideration of the potential roosting features on the building within the context of the suitability of the surrounding landscape to support commuting and foraging bats.

Table 5: Guidelines for Assessing the Potential Bat Suitability of Structures and Habitats (Adapted from Collins, (2023))

Suitability	Description of Roosting Habitats	Commuting and Foraging Habitats
Negligible	Negligible features likely to be used by roosting bats. An absence of accessible voids, cracks and crevices.	Negligible features likely to be used by commuting or foraging bats. A lack of landscape habitat features.
Low	A structure or tree with a potential roost site which could be used by individual bats, which does not provide enough space, shelter, protection, or appropriate conditions (i.e. temperature, humidity, height above ground level, light levels, disturbance) or suitable surrounding habitat to be used on a regular basis by larger numbers of bats.	Habitat that could be used by small numbers of commuting bats such as a hedgerow with gaps or unvegetated stream, but isolated (i.e. not very well connected to the surrounding landscape by habitat). Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	A structure or tree with a potential roost site that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but is unlikely to support a roost of high conservation status (such as a maternity colony).	Continuous habitat connected to the wider landscape that could be used by commuting bats 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 or tree with one or more potential roost sites that are 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.	Continuous high-quality habitat that is well connected to the wider landscape likely to be used regularly by commuting bats such as river valleys, streams, hedgerows, lines of trees, and woodland edge. Continuous 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. Sites which are close to and connected to known roosts.

Bats – Commuting and Foraging

- 2.20. With reference to Table 6, an assessment of the habitats at the site to support commuting and foraging bats was made, within the context of habitat connectivity to features in the wider landscape. The site was assessed as either negligible, low, moderate, or high suitability for commuting and foraging bats.

Nesting Birds

- 2.21. An assessment of the habitats on site to support nesting birds was made, and the site was searched where accessible for active or historical bird nests. Any sightings of bird nesting behaviour associated with the site was also noted.

Hazel Dormouse

- 2.22. An assessment of the suitability of the habitats at the site to support hazel dormouse was made with reference to Bright *et al.* (2006), and any incidental sightings of dormouse evidence recorded where encountered.

Terrestrial Invertebrates

- 2.23. An assessment was made of the suitability of the habitats at the site to support notable assemblages of invertebrates, such as vegetation structure, vegetation species diversity, deadwood, and host plants/ animals.

Reptiles

- 2.24. An assessment was made of the suitability of the habitats at the site for reptiles. Optimal habitat for reptiles includes rough grassland, moorland, heathland, woodland and scrub, sub-urban areas such as railway embankments, golf courses and allotments, and sympathetically managed farmland. Favourable features for reptiles include sunny south facing banks for basking, ecotones such as the transition between grassland and scrub, and hibernacula such as stone, log, and brash piles.

Otter

- 2.25. An assessment of the habitats at the site to support otter was made, and a search for evidence of otter carried out with reference to Chanin (2003a), Chanin (2003b) and Chanin (2005).

Water Vole

- 2.26. With reference to Dean *et al.* (2016), Strachan *et al.* (2011), and Natural England (2008) an initial assessment of the habitats at site was carried out for the suitability to support water vole during the Extended UKHab Habitat Survey.

Fish

- 2.27. An initial assessment of the habitats at site was carried out for the suitability to support notable fish species during the Extended UKHab Habitat Survey, such as presence of suitable watercourses and waterbodies.

Aquatic Invertebrates (including White-clawed Crayfish)

- 2.28. With reference to Peay (2002), Peay (2003), and Holdich (2003) an initial assessment of the suitability of habitats present at the site to support white clawed crayfish *Austropotamobius pallipes* was undertaken during the Extended UKHab Habitat Survey.

Other Mammals

- 2.29. An assessment of the site to support other mammals including brown hare, harvest mouse, and hedgehog was also made.

Invasive Species

- 2.30. Invasive plant species such as those listed on Schedule 9 of the Wildlife and Countryside Act 1981 (As Amended) were recorded where encountered during the UKHab Habitat survey.

Limitations

- 2.31. It must be noted that survey effort has been made to provide detailed descriptions of the site within the context of potential usage by protected species, however a fully comprehensive assessment and prediction of natural factors cannot be made. The protected species assessment provides a professional view of the likelihood of such species being present and cannot be taken as a definitive presence or absence of the same. Systematic presence/ likely absence surveys for such species, which typically require multiple survey visits, have not been undertaken and are outside of the scope of Preliminary Ecological Appraisal. Such surveys are recommended in the present report if considered proportionate to the potential ecological impacts of the development proposals.
- 2.32. A full search of crevices and cavities on buildings typically cannot be made without specialist access equipment and in most cases intrusive works, and therefore accessible areas only have been searched for evidence of protected species and a negative result of evidence does not conclusively equate to absence of such species which may occupy inaccessible crevices on the building. However, provided any recommended nocturnal emergence/ re-entry bat survey(s) are undertaken, this is not considered a significant limitation to assessing the presence/ likely absence of roosting bats at the site.
- 2.33. Third party desk study data is not exhaustive, and an absence or a negative result of a species does not indicate the absence of protected species from the site/ search area.
- 2.34. The UKHab Habitat survey was undertaken outside of the optimal survey period of April to October. However, species identification of plants present outside of the optimal period is typically still possible based on the vegetative characteristics. Where additional surveys during the optimal period are required to assess the habitat type present, these are recommended.
- 2.35. All dimensions, locations and distances provided are approximate.

3. Results

Desk Study

Surrounding Landscape

- 3.1. The surrounding landscape is primarily sub-urban (Figure 2: Surrounding Landscape Plan).
- 3.2. Habitat features favourable to ecology in the wider landscape include agricultural land, waterbodies, hedgerows, and woodland blocks.
- 3.3. Landscape features which may limit habitat quality and connectivity include the surrounding towns of Radcliffe and Bury and associated artificial lighting and disturbance.

Statutory Designated Sites

- 3.4. The site does not form part of an international or national designated site for nature conservation.
- 3.5. A summary of designated sites identified via the desk study are presented in Table 7 below.

Table 6: Summary of Statutory Designated Sites

Site Name	Designation	Description/ Reasons Designation	Main for	Distance & Direction from Site
Hollins Vale	Local Nature Reserve (LNR)	Farmland reserve with areas of woodland and wetland.		1.9km E
Chaplefield	LNR	Birds, waterfowl, dragonflies, other aquatic fauna are present.		2.1km S
Ashdough	Site of Special Scientific Interest (SSSI)	EW – Westphalian		3.5km SW
Kirklees Valley	LNR	Habitats include woodland, grassland, heathland, ponds, lodges and streams. Wildlife includes a variety of birds, amphibians and bats.		3.7km N
Chesham Woods	LNR	Habitats include broadleaved semi-natural woodland, broadleaved semi-natural plantation, scrub, improved grassland, neutral grassland and an orchard.		3.9km NE

Site Name	Designation	Description/ Reasons Designation	Main for	Distance & Direction from Site
Philip's Park	LNR	Semi-natural woodland with wildflowers characteristic of ancient woodland, remnant heathland, and wildflower rich grassland.		4km S
Mere Clough	LNR	Large woodland.		4.1km SE
Clifton Country Park	LNR	Habitats include woodland, open water, and semi-natural grassland.		4.5km SW
Moses Gate	LNR	Restored from an old industrial site with unique wildlife present.		4.5km SW
Nob End	SSSI and LNR	Lowland calcareous grassland, lowland neutral grassland, and woodland/scrub.		4.8km SW
Rochdale Canal	Special Areas of Conservation (SAC)	Floating water-plantain <i>Luronium natans</i> .		8.7km E

- 3.6. The site lies within a Site of Special Scientific Interest Impact Risk Zone (SSSI IRZ), requiring the Local Planning Authority to consult with Natural England on any risks which may affect the SSSI sites as a result of certain development types. However, the current development type is not listed in the SSSI IRZ citation as requiring consultation.

Non-Statutory Designated Sites

- 3.7. The site does not form part of a non-statutory designated site for nature conservation.
- 3.8. A summary of non-statutory designated sites identified via the desk study are presented in Table 8 below.

Table 7: Summary of Non-Statutory Designated Sites

Site Name	Designation	Description/ Reasons Designation	Main for	Distance & Direction from Site
Swan Lodge	Site of Biological Importance (SBI)	Open and running water with aquatic invertebrate assemblage		0.02km east
Manchester, Bolton & Bury Canal (East)	SBI	Ponds and canal		0.275km west
Elton Goit	SBI	Grassland with bird assemblage		0.3km west
Withins Reservoir	SBI	Reservoir with bird assemblage		0.6km west
Elton Reservoir	SBI	Grassland with bird assemblage		0.7km northwest
Lower Hinds	SBI	Calcareous grassland		0.85km north
Wetland Near Radcliffe	SBI	Ponds and small lodges		0.9km southwest

Priority Habitats and Ancient Woodland

3.9. No priority habitats were noted on site via the desk study.

3.10. No areas of ancient woodland were identified within the search radius via the desk study.

3.11. A summary of priority habitats identified via the desk study are presented in Table 9 below.

Table 8: Summary of Priority Habitats

Habitat type	Distance & Direction of Closest Priority Habitat Type from Site
Lowland Fens	0.08km E
Coastal and Floodplain Grazing Marsh	0.1km W
Lowland Dry Acid Grassland	0.1km W
Purple Moor Grass and Rush Pasture	0.1km W

Deciduous Woodland	0.1km N
Good quality semi-improved grassland (Non-Priority)	0.3km SW
Lowland Meadows	0.4km W
No main habitat but additional habitats present (Coastal and Floodplain Grazing Marsh)	0.7km NW
Open Mosaic	0.8km N
Reedbeds	0.9km SW

Field Survey

UKHab Habitat Survey

- 3.12. The habitats recorded at the survey site during the UKHab Habitat survey are presented in Table 10 and mapped on Figure 3, UKHab Habitat Plan.

Table 9: UKHab Habitat Assessment Results

UKHab Primary Code	Habitat Type	UKHab Secondary Code	Description	(NERC) Act 2006 HPI*	Habitat of Local Importance	Photograph Ref No. (Appendix 2: Photographs)
g4	Modified grassland	10 – scattered scrub	An area of modified grassland was present in the centre of the site and included abundant annual meadow grass <i>Poa annua</i> , with frequent cock's foot <i>Dactylis glomerata</i> , bramble <i>Rubus fruticosus</i> , butterfly bush <i>Buddleja sp.</i> , moss, and dogwood <i>Cornus sanguinea</i> , occasional colt's foot <i>Tussilago farfara</i> , spear thistle <i>Cirsium vulgare</i> , broadleaved dock <i>Rumex obtusifolius</i> , ribwort plantain <i>Plantago lanceolata</i> , common nettle <i>Urtica dioica</i> , fescue <i>Festuca sp.</i> , Yorkshire fog <i>Holcus lanatus</i> , and soft rush <i>Juncus effusus</i> , and rarely present vetch <i>Vicia sp.</i> , and ragwort <i>Senecio jacobaea</i> .	No	No	1
h3d	Bramble scrub		An area of dense bramble scrub was present to the east of the modified grassland.	No	No	2
h3j	Willow scrub		An area of willow scrub dominated by crack willow <i>Salix fragilis</i> with mature and self-set trees and rarely present ash <i>Fraxinus excelsior</i> was present in the west of the site. The ground flora comprised 80% bare ground cover with occasional common nettle. Japanese knotweed, a Schedule 9 INNS was frequent throughout the habitat.	No	No	3
u1b6	Other developed land		An area of artificial grass was associated with building B1, and an area of hardstanding was present to the south of the area of modified grassland.	No	No	4
u1c	Artificial, unvegetated unsealed surface		The western half of the site primarily comprised an area of gravel surfacing.	No	No	6
u1e	Built linear features	612 - fence	Metal fences were present throughout the site.	No	No	7
w	Woodland and forest	33 – line of trees	A line of trees was present along the north site boundary and included frequent sycamore <i>Acer pseudoplatanus</i> and ash, with occasional hawthorn <i>Crataegus monogyna</i> , and rarely present crack willow.	No	No	8

*Natural Environment and Rural Communities Act (2006) Section 41 Habitat of Principal Importance (HPI). As defined with reference to habitat descriptions provided in Maddock, A. (ed) (2011).

Protected/ Notable Species

- 3.13. The results of the protected/ notable species assessment undertaken during the Extended UKHab Habitat Survey are provided in Table 11 overleaf.
- 3.14. A summary of desk study results is also provided in Table 11. Additional species records were returned by the LERC within the search radius, which are considered unlikely to be impacted by the proposed development and are therefore not included. These include species for which there is no suitable habitat present on site or the surrounding area.

Table 10: Protected/ Notable Species Assessment

Species/ Species Group	Desk Study	Evidence Observed During Extended UKHab Habitat Survey	Suitability of Habitats Present
Amphibians (including great crested newt)	No previously Granted Mitigation Licence records relating to GCN were returned via the desk study. One record of Great Crested Newt Class Survey Licence Returns was returned via the 2km desk study. This was located approximately 1.7km north of the site and confirmed the presence of GCN, dated 17/10/2016. No records of Great Crested Newt Pond Surveys 2017 – 2019 were returned via the 2km desk study. 63 records of GCN were returned via the LERC. The closest record related to GCN larvae present at a location approximately 0.35km northwest of the survey site, dated 2021. 23 records of common toad <i>Bufo bufo</i> were returned via the desk study. The closest two records related to a single location approximately 0.3km north of the survey site, dated 2019.	No evidence observed.	No ponds were present on site. Four ponds (P1-P4) were noted within 250m via the desk study and were located approximately 50m northeast, 100m northeast, 90m east, and 170m southeast of the survey site respectively. Four watercourses (WC1-WC4) were also located within 250m of the survey site and were located approximately 20m north, 40m east, 140m northeast, and 200m east of the survey site respectively (Figure 4: Pond Plan). No access to ponds P1 and P2 and watercourses WC1 and WC2 was available at the time of survey, and watercourse WC3 was considered unsuitable for GCN due to fast flowing water. Ponds P3 and P4 appeared to be one larger pond combined and was subject to a HSI assessment. Watercourse WC4 was also subject to a HSI assessment. See Habitat Suitability Index Results table for details. The tussocky modified grassland, dense bramble scrub, and willow scrub offered small areas of suitable habitat for terrestrial amphibians. The brash pile present at target note TN1 offered suitable hibernacula for terrestrial amphibians (Figure 3: UKHab Habitat Plan, Appendix 2: Photographs, Photo 9).
Badger	27 records of badger were returned via the desk study. The closest record related to a sett present at Swan Lodge, approximately 0.15km north of the survey site, dated 2020.	Well-worn mammal paths potentially attributable to badger were observed within the modified grassland on site (Figure 3: UKHab Habitat Plan, Appendix 2: Photographs, Photo 10).	The site offered suitable habitat for commuting and foraging badger.
Bats – GLTA	A total of five previously Granted Mitigation Licence records relating to bats were returned via the 2km desk study of the site. The closest record was located approximately 0.9km southwest of the site. The licence allowed for the destruction and damage of a resting place, and the destruction and damage of a breeding place for common pipistrelle, dated 15/09/2015 to 31/10/2015.	No evidence observed.	One tree with PRFs was observed on site. A mature crack willow was present at the eastern end of the treeline with a knot hole and shearing crack present on the southern branch. The tree was assessed as PRF-M (Figure 3: UKHab Habitat Plan, Appendix 2: Photographs, Photo 11).
Bats - PRA		No evidence observed.	N/A
Bats – commuting and foraging	The second closest record was located approximately 1.7km northwest of the site. The licence allowed for the damage and destruction of a resting place, and the damage and destruction of a breeding place for common pipistrelle, dated 01/04/2018 to 30/04/2018. The next record was located approximately 1.8km north of the site. The licence allowed for the destruction of a non-breeding resting place for common pipistrelle, dated 01/05/2015 to 30/06/2020. The fourth closest record was located approximately 1.9km south of the site. The licence allowed for the damage and destruction of a resting place, and the damage and destruction of a breeding place for common pipistrelle, dated 03/02/2010 to 31/01/2012. The final record was located approximately 1.9km north of the site. The licence related to common pipistrelle and allowed for the destruction of a breeding site, dated 08/04/2013 to 01/10/2015.	No evidence observed.	The site offered a small area of low suitability habitat for foraging and commuting bats, comprising dense scrub and a treeline with immediate access to further suitable habitat in the surrounding landscape.

	161 records of bats were returned via the LERC desk study comprising records of brown long eared bat, common pipistrelle, soprano pipistrelle, Nathusius' pipistrelle, unidentified pipistrelle species, Brandt's bat, Daubenton's bat, unidentified myotis bat, noctule, Leisler's noctule, and unidentified bat species. The closest record related to a common pipistrelle casualty at a location approximately 0.1km north of the survey site, dated 2017. The closest record of a roost related to a common pipistrelle maternity roost at a location approximately 0.15km southwest of the survey site, dated 2020.		
Birds	A range of bird data was returned via the desk study, including Schedule 1, red, and amber listed birds. The closest record related to the amber listed song thrush and bullfinch at Swan Lodge SBI, approximately 0.05km east of the survey site, dated 2021. The closest Schedule 1 listed bird related to a kingfisher at Swan Lodge SBI, approximately 0.15km northeast of the survey site, dated 2020. The closest red listed bird related to a house sparrow at a location approximately 0.1km west of the survey site, dated 2017.	An unidentified bird eggshell was observed within the modified grassland at target note TN2 (Figure 3: UKHab Habitat Plan, Appendix 2: Photographs, Photo 12). Two bird nests were present within the tree line at target notes TN3 (Figure 3: UKHab Habitat Plan, Appendix 2: Photographs, Photo 13).	The trees and dense scrub on site offered suitable habitat for a range of nesting birds.
Hazel dormouse	The site is outside of the known distribution area for hazel dormouse. This species is not considered further.		
Otter, water vole, aquatic invertebrates (including white-clawed crayfish), and fish.	Due to the lack of suitable habitats on and immediately adjacent to the site, including ponds and watercourses, these species are not considered further.		
Terrestrial invertebrates	10 records of terrestrial invertebrate were returned via the desk study comprising records of buff ermine, cinnabar, small heath, wall, and white ermine. The closest record related to a cinnabar located approximately 0.2km north of the survey site, dated 2021.	No evidence observed.	The site offers areas of common and widespread habitats of limited botanical diversity or interest. It is therefore considered unlikely that the site would support notable invertebrate populations.
Reptiles	No records of reptiles were returned via the desk study.	No evidence observed.	The tussocky modified grassland, dense bramble scrub, and willow scrub offered suitable habitat for reptiles. The brash pile present at target note TN1 offered suitable hibernacula (Figure 3: UKHab Habitat Plan, Appendix 2: Photographs, Photo 9).
Other Mammals (including brown hare, harvest mouse, and hedgehog)	124 records of other mammals were returned via the desk study, comprising records of brown hare and hedgehog. The closest record related to a hedgehog, located approximately 0.15km southwest of the site, dated 2021.	No evidence observed.	The site also offered suitable commuting and foraging habitat for hedgehog and brown hare.
Invasive species	No records of INNS were returned via the desk study.	Japanese knotweed, a Schedule 9 invasive non-native plant species was frequently present throughout the willow scrub habitat in the east of the site (Appendix 2: Photographs, Photo 14).	N/A

3.15. The results of the HSI assessment of ponds on site and within a 250m radius of the site are presented Table 12 below. See Appendix 3 for the full breakdown of the HSI assessment.

Table 11: Summary of Habitat Suitability Index Results

Pond Number**	Distance From Site	HSI Score	HSI Result	Description	Photo Ref
P3 & P4 merged	90m east	0.47	Poor	Pond within a park area.	15
WC4	200m east	0.68	Average	Bealey's Goit, an artificial channel.	16

**See Figure 4: Pond Plan for pond reference numbers.

4. Ecological Constraints & Opportunities

- 4.1. The ecological constraints and opportunities, and recommendations for avoidance, mitigation, or further survey (where required) are provided in Table 14 overleaf.

Table 12: Ecological Constraints & Opportunities

Ecological Feature	Potential Ecological Impact & Level of Constraint	Potential Avoidance, Mitigation and/or Compensation Measures	Further Survey Required to Inform an Ecological Impact Assessment
Statutory Designated Sites	It is considered that the development will not adversely impact on the designated sites for nature conservation identified in the desk study, due to the distance between the designated sites and the development site, and the small scale of the works proposed.	N/A	No further surveys required.
Non-Statutory Designated Sites	Swan lodge (SBI) is located approximately 0.02km east of the survey site, and there is a risk that the proposed development may indirectly impact the SBI via pollution.	Strict pollution control measures are recommended for the works to include the provision of pollution control and spill kits, and no storage of liquids or fuel materials within 10m of the SBI boundary.	No further surveys required.
Habitats (general)	The trees on site are considered to be of local conservation value to wildlife. The remaining habitats on site are considered to be common and widespread habitats of low conservation importance. However, cumulatively these habitats have local conservation value taken as the biodiversity value of the site. There will be some removal of trees, modified grassland, bramble scrub, and willow scrub required to facilitate the development.	Further assessment is required to assess the impacts of the development on the biodiversity value of the site. See adjacent column.	A biodiversity impact assessment to calculate the change in biodiversity units between the baseline habitats and the proposed site plans using the Statutory Biodiversity Metric has been undertaken. Refer to the corresponding Biodiversity Net Gain report (Elton Ecology, 2024).
Badgers	Badgers are afforded legal protection under the Protection of Badgers Act 1992. No evidence of badger was recorded during the survey, however their presence in the landscape cannot be fully discounted. There remains a residual risk of badger injury and mortality during construction should this species be mobile in the area. Under the current development proposals there will be some removal of suitable commuting and foraging habitat for badger in the form of modified grassland, bramble scrub, and willow scrub.	Precautionary methods should be implemented during works to protect foraging and commuting badger. Foundation ditches and other ditches, excavations, or trenches, which can be hazardous to badgers, should be closed overnight or fitted with roughened sloping boards or steps to allow animals to escape should they become trapped. Concrete should not be left unset overnight, or suitable barriers erected to prevent animals accessing the concrete. Pipework with a diameter greater than 120mm should have the ends closed off overnight to prevent entrapment. These measures can be controlled via the implementation of a CEMP.	No further surveys required.
Birds	Nesting birds are afforded legal protection under the Wildlife and Countryside Act 1981 (as amended). There will be some removal of nesting bird habitat in the form of trees and dense scrub to facilitate the development.	Where works affecting nesting bird habitat at the site cannot avoid the nesting bird season of March to August (inclusive) and September in mild years, the habitat to be subject to works should be surveyed for nesting birds immediately prior to removal by a suitably qualified ecologist. If nesting birds are recorded, a suitable buffer zone should be defined by the ecologist and implemented until the ecologist confirms the chicks have fledged. If species identification is possible, this can be used to inform the typical egg incubation and fledging period, giving an indication of an appropriate time for re-survey to confirm fledging. In the unlikely event that nesting birds are encountered during works, works should cease immediately, and the advice of a suitably qualified ecologist sought.	No further surveys required.
Bats	Bats are a fully protected European Protected Species (EPS) under The Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981 (as amended).	One crack willow within the treeline was assessed as PRF-M. Should this be impacted under the current development proposals, further surveys are required to inform the appropriate avoidance, mitigation and/or compensation measures relating to tree roosting bats that may be present. See adjacent column.	If the tree with bat roosting suitability at the north site boundary cannot be retained, with reference to best practice guidelines (Collins, 2023), for trees assessed as PRF-M, close inspection/aerial surveys should be undertaken of the PRFs to confirm the presence/likely absence of roosting bats. The surveys should include 3 visits by a suitably qualified

Ecological Feature	Potential Ecological Impact & Level of Constraint	Potential Avoidance, Mitigation and/or Compensation Measures	Further Survey Required to Inform an Ecological Impact Assessment
	One tree with PRFs was observed on site, within the treeline at the north site boundary. It is recommended that this tree is retained.	Due to the presence of bats in the wider landscape, as highlighted in the desk study, the impacts from external artificial lighting at the site on adjacent habitats should be avoided. Where lighting is required, this should be sympathetic to wildlife through the design of lighting observing the principles set out in guidelines from the Bat Conservation Trust (BCT) & Institution of Lighting Professionals (BCT & ILP, 2018). In the event that bats are encountered during works, works should cease immediately, and the advice of a suitably experienced ecologist sought.	ecologist between May and September, with at least two visits being between May and August.
Amphibians (including GCN) and Reptiles	GCN are fully protected as a European Protected Species (EPS) under The Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981 (as amended). Reptiles are partially protected under the Wildlife and Countryside Act 1981 (as amended), protecting them from killing or injury. Under the current development proposals, small areas of suitable terrestrial amphibian and reptile habitat will be removed, including areas of modified grassland, bramble scrub, willow scrub, and brash pile. Entering the values of '0.1-0.5 ha lost or damaged' of suitable GCN terrestrial habitats on 'Land within 100m from any breeding pond(s)' produces a rapid risk assessment result in the Natural England GCN licence method statement of 'Amber: Offence Likely'. In accordance with the method statement, non-licensed avoidance measures are appropriate and it is therefore considered that further survey is not required, provided Precautionary Working Methods are followed during works.	To prevent the killing and injury of amphibians and reptiles during the development, it is recommended that vegetation clearance at the site is carried out under a Precautionary Working Method Statement for amphibians and reptiles under the supervision of an ecologist, to include staged and directional vegetation removal encouraging the safe displacement of other amphibians and reptiles into retained habitats on site, and a fingertip search for other amphibians and reptiles prior to the removal of suitable hibernacula (e.g. the brash pile), at an appropriate time of year.	No further surveys required.
Other Mammals	Some mammals, such as hedgehog and brown hare, are listed as Species of Principal Importance in England under section 41 of the Natural Environment and Rural Communities Act 2006. These species are termed 'Priority' species and receive special considerations in the planning process. Under the current development proposals, suitable commuting and foraging habitat for hedgehog and brown hare will be removed, comprising areas of modified grassland, bramble scrub, and willow scrub.	The precautionary working methods implemented for badger and reptiles will also protect other mammals such as hedgehog and brown hare.	No further surveys required.
Invasive Non-Native Species (INNS)	Schedule 9 of The Wildlife and Countryside Act 1981 (as amended by the Countryside and Rights of Way Act 2000) makes it an offence to cause any plant listed to grow in the wild unless all reasonable steps were taken to prevent an offence and due diligence was exercised. The removal of the willow scrub on site will require disturbance to or remove of the Schedule 9 species present including Japanese knotweed. This could result in an offence if the plants are caused to spread.	Due to the presence of Japanese knotweed on site, it is recommended that a specialist contractor is appointed to remove and control the invasive species on site. This should be included within a construction environmental management plan for the site to prevent an offence occurring during construction.	No further surveys required.

5. Conclusions

Further Surveys

- 5.1. The following further ecological surveys are required to inform the impact of the proposed development:
- A biodiversity impact assessment to calculate the change in biodiversity units between the baseline habitats and the proposed site plans using the Statutory Biodiversity Metric has been undertaken. Refer to the corresponding Biodiversity Net Gain report (Elton Ecology, 2024).
 - With reference to best practice guidelines (Collins, 2023), for trees assessed as PRF-M, should it require removal, close inspection/aerial surveys should be undertaken of the PRFs to confirm the presence/likely absence of roosting bats. The surveys should include 3 visits by a suitably qualified ecologist between May and September, with at least two visits being between May and August.

Biodiversity Enhancement

- 5.2. Suitable methods of biodiversity enhancement for the site would include:
- The installation of two generic bird boxes and any retained tree on site. A suitable model is the *1B Schwegler Nest Box*, one with a 32mm hole, and one with a 26mm hole. The use of woodcrete nest boxes will ensure a longer box lifespan of 20-25 years. Boxes will be hung at a height of 1.5m or higher, and angled so they face away from prevailing wind, the chances of occupation are higher if there is a good tree or hedge cover nearby.
 - Any trees removed could be left within the remaining woodland to form deadwood habitats for notable invertebrates, or cut and placed to form log piles, creating habitats for reptiles, amphibians, and small mammals.
 - A landscaping scheme could incorporate native shrubs and trees of value to wildlife. Once matured, these habitats would offer a nesting and foraging resource for birds.

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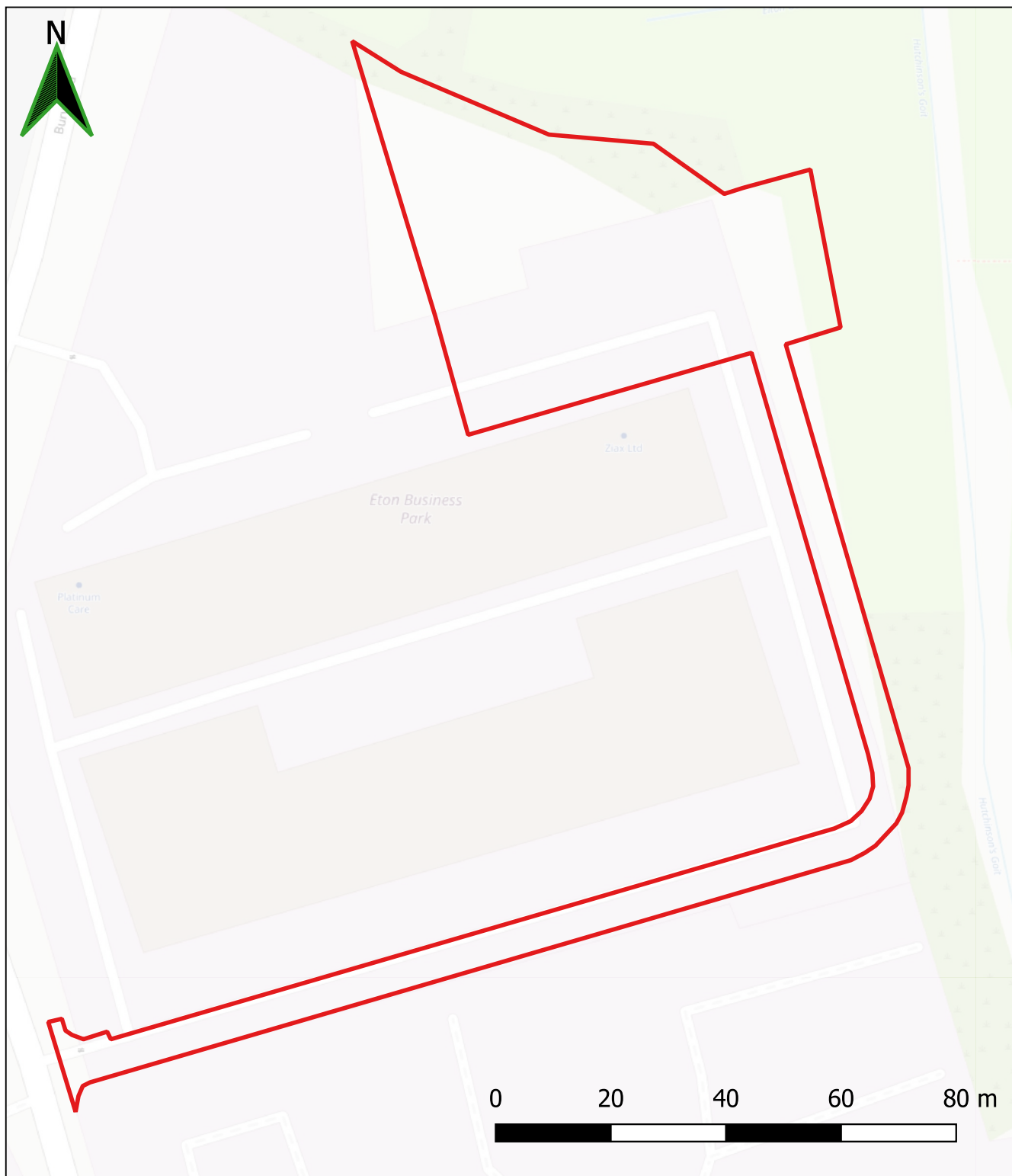
7. Figures

Figure 1: Site Location & Building Plan (Overleaf)

Figure 2: Surrounding Landscape Plan (Overleaf)

Figure 3: UKHab Habitat Plan (Overleaf)

Figure 4: Pond Plan (Overleaf)



Legend

 Site boundary

Project:
New Yard Areas, Land at Eton Business Park, Eton Hill Road, Radcliffe

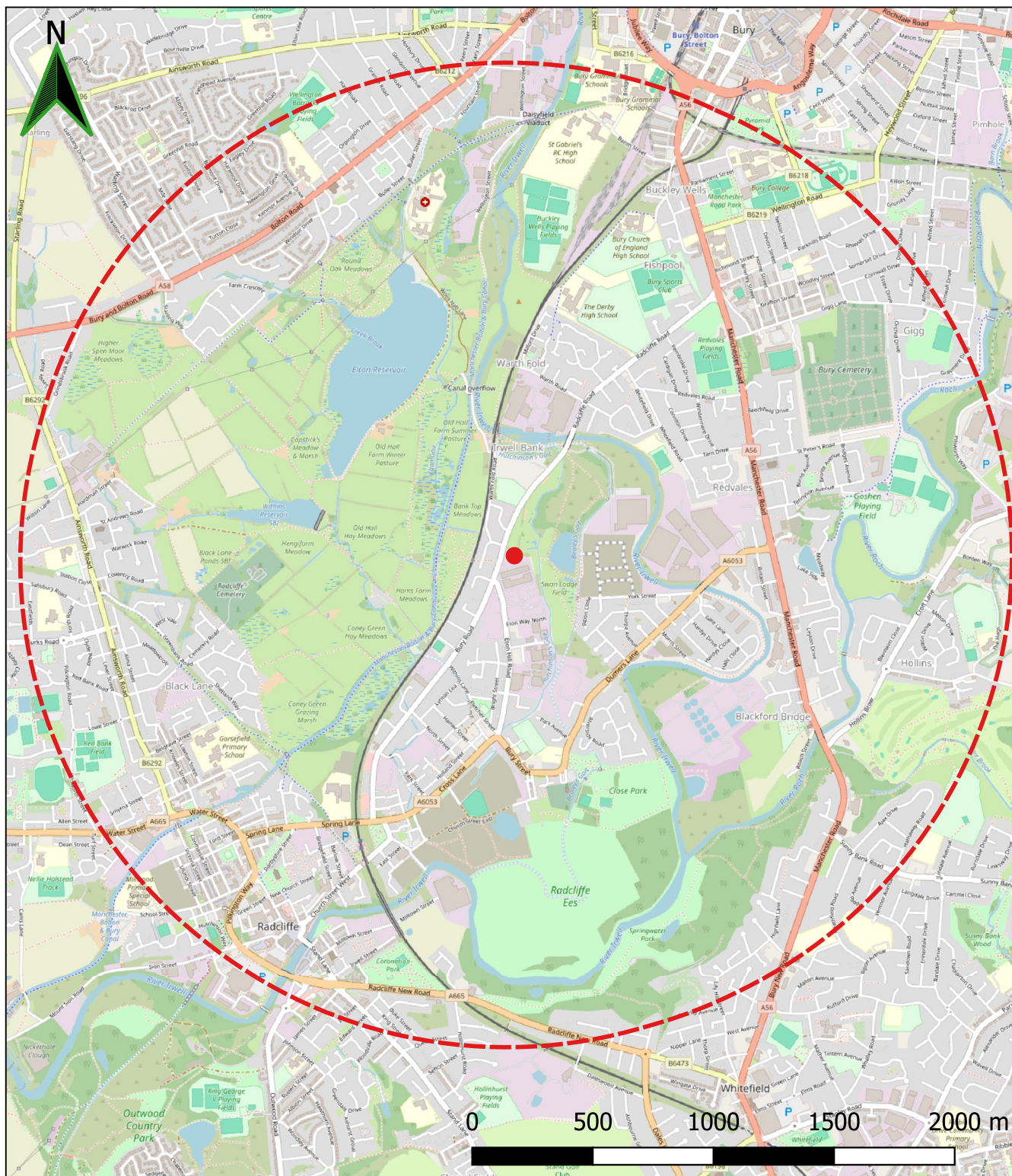
Drawing:
Figure 1: Site Location Plan

Date: 14-07-2024	Version: FINAL
Author: TE	Job No: P2582



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Legend

- Site location
- ▭ 2km site buffer

Project:
New Yard Areas, Land at Eton Business Park, Eton Hill Road, Radcliffe

Drawing:
Figure 2: Surrounding Landscape Plan

Date: 12-04-2024 Version: FINAL
Author: PH Job No: P2582



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Legend

- Site boundary
- g4 - modified grassland
- h3d - bramble scrub
- u1 - built-up areas and gardens
- u1b - developed land. sealed surface
- u1b6 - other developed land
- h3 - dense scrub
- u1 - introduced shrub
- u1b - developed land. sealed surface
- u1e - built linear features
- w - woodland and forest
- ⊙ Target notes with reference number
- Tree with bat roosting suitability
- Mammal path

Secondary codes:
 10 - scattered scrub
 33 - line of trees
 612 - fence

Project:

New Yard Areas, Land at Eton Business Park, Eton Hill Road, Radcliffe

Drawing:

Figure 3: UKHab Habitat Plan

Date: 14-07-2024

Version: FINAL

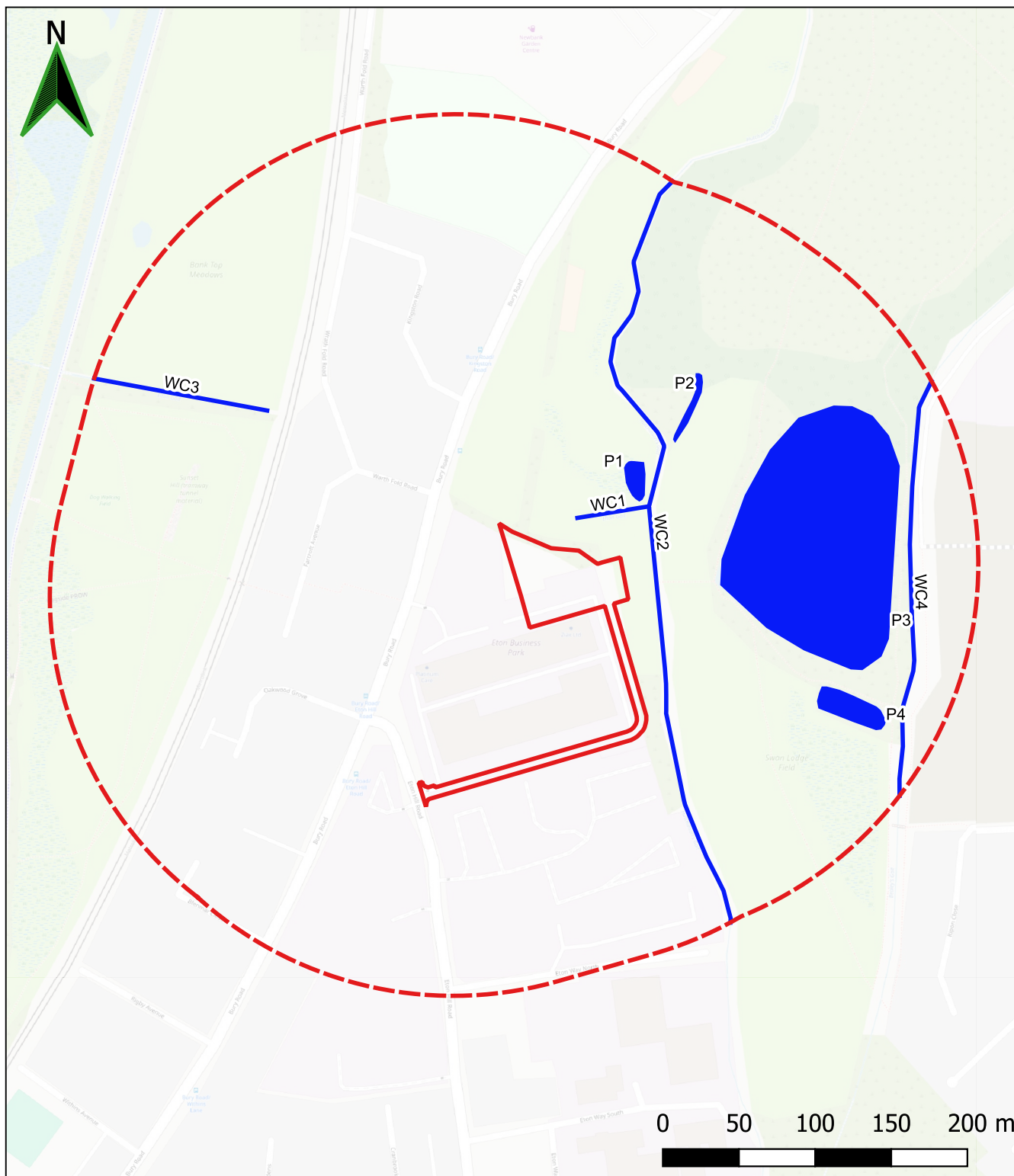
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Legend

- Site boundary
- 250m pond buffer
- Ponds with reference number
- Watercourse with reference number

Project:

New Yard Areas, Land at Eton Business Park, Eton Hill Road, Radcliffe

Drawing:

Figure 4: Pond Plan

Date: 14-07-2024

Version: FINAL

Author: TE

Job No: P2582



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Appendix 1: Planning Policy & Legislation Summary

This appendix serves as a summary of relevant policy and legislation. It is not intended to supersede the policy or legislation documents to which it refers, and the relevant full documents should always be consulted prior to decision making.

National Planning Policy Framework 2023

Biodiversity is a material consideration under the National Planning Policy Framework (2023). Relevant text to biodiversity from the NPPF is described below.

In Section 2 of the NPPF 'Achieving sustainable development', paragraph 8(c), the NPPF sets an environmental objective:

- "to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."

In Section 15 'Conserving and enhancing the natural environment', the NPPF states that:

"180. Planning policies and decisions should contribute to and enhance the natural and local environment by:

- 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);
- 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; [...]
- minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. [...]"

The NPPF, in paragraph 185 sets out that to protect and enhance biodiversity, plans should:

- "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 biodiversity⁶⁵; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- 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."

In determining planning applications, the NPPF paragraph 186 sets guidance that local planning authorities should apply the following principles:

- "if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the

benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest [...];

- development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
- 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.”

Paragraph 187 states that the following sites should be given the same protection as habitats sites:

- “potential Special Protection Areas and possible Special Areas of Conservation;
- listed or proposed Ramsar sites; and
- 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.”

Paragraph 188 states that “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 projects will not adversely affect the integrity of the habitats site.”

Paragraph 191 states that planning policies and decisions should ensure new development is appropriate to its location and take into account likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should:

- “Mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development [...]; [...] and
- limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.”

Government Circular ODPM 06/05 Biodiversity and Geological Conservation

The government circular provides administrative guidance on the application of statutory obligation and legislation relating to planning and nature conservation in England. It complements the National Planning Policy Framework. The document includes guidance on designated sites (international and national), habitats, and protected species.

Relating to protected species and the requirement for their consideration in planning applications, the government circular, in paragraph 98 details 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. Local authorities should consult English Nature [now Natural England] before granting planning permission. They should consider attaching appropriate planning conditions or entering into planning obligations under which the developer would take steps to secure the long-term protection of the species. They should also advise

developers that they must comply with any statutory species' protection provisions affecting the site concerned."

Paragraph 99, relating to the requirement and timing of protected species survey and mitigation, the government circular states that:

"It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted. However, bearing in mind the delay and cost that may be involved, developers should not be required to undertake surveys for protected species unless there is a reasonable likelihood of the species being present and affected by the development. Where this is the case, the survey should be completed and any necessary measures to protect the species should be in place, through conditions and/or planning obligations, before the permission is granted. In appropriate circumstances the permission may also impose a condition preventing the development from proceeding without the prior acquisition of a [Natural England] licence."

The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019

The term 'European Protected Species' (EPS) is used to describe species listed on Schedule 2 of the The Conservation of Habitats and Species Regulations 2017 (as amended). Regarding these species, Regulation 43 of the Regulations make guilty of an offence a person who:

- "Deliberately captures, injures or kills any wild animal of a European protected species;
- Deliberately disturbs wild animals of any such species;
- Deliberately takes or destroys the eggs of such an animal, or;
- Damages or destroys a breeding site or resting place of such an animal [...]"

Regulation 43 defines that the disturbance of animals includes any disturbance which is likely to:

- Impair their ability:
 - to survive, to breed or reproduce, or to rear or nurture their young; or
 - in the case of animals of a hibernating or migratory species, to hibernate or migrate; or
 - to affect significantly the local distribution or abundance of the species to which they belong.

A person guilty of an offence under Regulation 43 is liable on summary conviction to imprisonment for a term not exceeding six months or to a fine, or to both.

Wildlife and Countryside Act 1981 (As Amended)

The Wildlife and Countryside Act 1981 (as amended by the Countryside and Rights of Way Act 2000) lists species on Schedule 5 for which the Act make it an offence to:

- Intentionally kill, injure or take;

- Recklessly or intentionally damage or destroy, or obstruct access to any structure or place which any wild animal included uses for shelter or protection;
- Recklessly or intentionally disturb any such animal while it is occupying a structure or place which it uses for shelter or protection.

Some species receive partial protection under the Act, which limits their protection under the Act to intentional killing or injury.

All wild nesting birds are protected under the Act, making it an offence to:

- Intentionally kill, injure or take any wild bird; and
- Take, damage or destroy the nest (whilst being built or in use) or eggs of any wild bird.

Some bird species are afforded special protection via their inclusion in Schedule 1 of the Act, which makes an offence to intentionally or recklessly disturb any schedule 1 bird building a nest or which is in, on or near a nest containing eggs or young; or to disturb dependent young of such a bird, or whilst such a bird 'leaks' (i.e. congregates for community courtship behaviour).

Schedule 9 of the Act makes it an offence to cause any plant listed to grow in the wild, unless all reasonable steps were taken to prevent an offence and due diligence was exercised.

The Act sets out provisions to protect Sites of Special Scientific Interest (SSSI).

Natural Environment and Rural Communities Act 2006

Section 40 of the Act places a legal duty on public authorities (including planning authorities) to have regard to biodiversity conservation in their normal functions (including planning applications).

Under Section 41 of the Act, lists of Habitats of Principal Importance (HPI) and Species of Principal Importance (SPI), of principal importance for the purpose of conserving biodiversity, are produced which serve to guide public authorities in carrying out their functions with consideration for biodiversity conservation.

Wild Mammals (Protection) Act 1996 (as amended)

The Act protects wild mammals against certain cruel acts, including intentional crushing, downing or asphyxiation.

Appendix 2: Photographs



Photo 1: Modified grassland and scattered scrub on site.



Photo 2: Dense bramble scrub.



Photo 3: Dense willow scrub.



Photo 4: Off-site Building B1 with artificial grass.



Photo 5: Off-site Building B2.



Photo 6: Area of gravel surfacing.



Photo 7: Metal fence between gravel surfacing and modified grassland.



Photo 8: Line of trees at north boundary.



Photo 9: Brush at target note TN1.



Photo 10: Well worn mammal path within modified grassland.



Photo 11: Crack willow with PRFs



Photo 12: eggshell at target note TN2.



Photo 13: Bird nest in treeline at target note TN3.



Photo 14: Japanese knotweed within willow scrub habitat.



Photo 15: Pond P3.



Photo 16: Watercourse WC4.

Appendix 3: Great Crested Newt Habitat Suitability Index

Pond	HSI Factor										HSI Score	HSI Result
	Geographic Location	Pond Area	Permanence	Water Quality	Shade	Waterfowl	Fish	Pond Count	Terrestrial Habitat	Macrophytes		
P3 & P4 merged	1.00	0.00	0.90	0.67	1.00	0.01	0.67	0.69	0.67	0.65	0.47	Poor
WC4	1.00	0.00	1.00	0.67	0.50	0.67	0.67	0.69	0.67	0.45	0.68	Average