



PRELIMINARY ECOLOGICAL APPRAISAL

Client: Surrey Heath Borough Council

Site: Diamond Ridge Woods, Camberley

07.02.2023

Version 003



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Report	This report remains valid for 12 to 18 months from date of issue. The report, conclusions and recommendations are valid for current development plans only. Should this change, the report should be reviewed and, if necessary, further survey work and desk study review undertaken.		
Survey Data	Survey data are valid for 12 to 18 months from the date the survey was undertaken.		

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The information which we have prepared and provided is true and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct.

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1. Summary

Site Details
<ul style="list-style-type: none"> • Site Address: Diamond Ridge Woods, Caesar's Close, Camberley, GU15 4EB. • OS grid reference: SU 8900 6156. • Approximate Area of Site: 0.386 ha.
Scope of Works
<ul style="list-style-type: none"> • aLyne Ecology Ltd. was commissioned by Surrey Heath Borough Council to undertake a Preliminary Ecological Appraisal (PEA), comprising a data search and field survey to assess the baseline ecological conditions of the site and its potential to support protected species and species of conservation concern.
Development Proposals
<ul style="list-style-type: none"> • The development proposals are for a change of land use to provide a traveller site, comprising four pitches.
Key Ecological Constraints and Opportunities
<ul style="list-style-type: none"> • The habitats recorded on site are as follows: modified grassland, other lowland mixed deciduous woodland, bramble scrub and developed land; sealed surface, (see Figure 1). • Thames Basin Heaths Special Protection Area (SPA) is located approximately 555 m to the north of the site. SPAs are European designated sites protected in the UK by Conservation of Habitats and Species Regulations 2017 (as amended). • Broadmoor to Bagshot Woods and Heaths Site of Special Scientific Interest (SSSI) is located approximately 555 m to the north of the site. SSSIs are protected through national legislation and planning policy. • There are three Sites of Nature Conservation Interest (SNCIs) located within 1 km of the site. SNCIs are afforded some protection via local planning policy. • The site is located within the Thames Basin Heaths Biodiversity Opportunity Area (BOA): TBH07 – Camberley & Broadmoor Heaths. • Other lowland mixed deciduous woodland, which is a Priority Habitat, forms the majority of the site. There are also four types of Priority Habitats located within 1 km of the site, namely deciduous woodland, hedgerows, lowland heathland, and ponds. Priority Habitats are listed on Section 41 of the Natural Environment and Rural Communities (NERC) Act, 2006. Under the NERC Act, 2006, Local Planning Authorities are required to give due regard to biodiversity. • Cotoneaster (see target note 1 on Figure 1) and variegated yellow archangel were recorded on site. These species are listed under Schedule 9 of the Wildlife and Countryside Act, 1981 (as amended) as invasive plant species. • The woodland and scrub habitats on site have potential to support stag beetles and European hedgehogs, both of which are Priority Species under the NERC Act, 2006.

- Ponds are absent from the site, and the nearest pond to site is located approximately 735 m to the north (www.magic.gov.uk). However, the woodland and scrub habitats on site could support great crested newts during their terrestrial phase. The great crested newt and its habitats are fully protected under the Wildlife and Countryside Act, 1981 (as amended), and the Conservation of Habitats and Species Regulations 2017 (as amended). The habitats on site could also support the common toad, which is a Priority Species listed on Section 41 of the NERC Act, 2006.
- The woodland and scrub habitats on site have the potential to support reptiles. Reptiles are protected against killing and injury under the Wildlife and Countryside Act, 1981, as amended. All reptile species are Priority Species as listed on Section 41 of the NERC Act, 2006.
- The woodland and scrub habitats on site could support nesting birds including birds of conservation concern. Under the Wildlife and Countryside Act, 1981 (as amended), it is illegal to take, damage or destroy the nests of wild birds whilst being built or in use.
- The woodland and scrub habitats on site could support foraging, and commuting bats. A tree with low potential to support roosting bats was identified at target note 2, on Figure 1. Bats, their roosts, and their habitats are strictly protected under the Wildlife and Countryside Act (1981) as amended and the Conservation of Habitats and Species Regulations 2017 (as amended).
- The site supports active badger setts. Signs of foraging by badgers were also identified during the survey. Badgers are fully protected under the Protection of Badgers Act, 1992.
- The site, which is well connected to surrounding woodland, could support the hazel dormouse. The hazel dormouse and its habitats are fully protected under the Wildlife and Countryside Act, 1981 and the Conservation of Habitats and Species Regulations 2017 (as amended).

Recommendations for Avoidance, Mitigation and Enhancement

- The site is located within 5 km of the Thames Basin Heaths SPA. Housing developments, where there is a net gain of one or more houses, within 5 km of the Thames Basin Heaths SPA are required to contribute towards avoidance measures (Suitable Alternative Natural Greenspace, SANG and Strategic Access Management and Monitoring, SAMM), to offset the likely significant effects on the SPA. For developments of fewer than 100 new dwellings, it should be possible to use Council-provided SANGs, subject to availability.
- Woodland on site should be retained, protected, and enhanced. Any woodland lost should be replaced (offsite) with like-for-like or better habitat and aim to contribute to the objectives and targets of the BOA. This should be informed by a Biodiversity Net Gain assessment.
- Where removal of trees is required to facilitate the new traveller pitches, areas of the site that comprise poorer quality woodland should be selected. For example, woodland comprising a sparse cover of young growth trees, which lack an established understorey and diverse ground layer, should be favoured.
- Buffer zones should be implemented between the location of the traveller pitches and retained woodland. There should be no direct access from the development into the woodland. The buffer should only be accessed for maintenance and materials/waste should not be stored in or near the buffer.

- Retained areas of woodland should be enhanced by planting native trees, shrubs, and bulbs, of local provenance and suited to the geology of the site.
- The proposals should not include planting of ornamental or otherwise non-native tree, shrub, and ground flora species.
- All brash and log piles should be retained and protected. All fallen and standing wood should be retained and protected.
- A sensitive lighting plan should be adopted, to ensure that outside lighting does not adversely affect habitats and wildlife, particularly bats when foraging and commuting.
- Trees and scrub should be retained, protected, and enhanced. The tree with low potential to support roosting bats (target note 2, Figure 1) should be retained and protected.
- Cotoneaster and variegated yellow archangel should be removed from site and disposed of, in accordance with best practice guidelines. Any laurel on site should also be removed.
- A fingertip search of the areas to be disturbed during site construction works should be carried out by a great crested newt licenced ecologist prior to works taking place. If any great crested newts are found, all works must cease immediately, and a European Protected Species Licence (EPSL) should be obtained from Natural England.
- The removal of the scrub and any brash/log piles should be carried out carefully by hand, to ensure that any stag beetles, common toads, reptiles, or European hedgehogs, which may be present, can escape unharmed.
- Any removal of vegetation should be undertaken outside of the bird breeding season (March to August inclusive) to avoid destruction/disturbance of nesting birds.
- Badger setts should be retained and protected.

Below is a summary of measures, which should be implemented on site to enhance biodiversity:

- The enhancement of retained woodland on site by planting native trees, shrubs, and bulbs.
- Garden spaces should include a suitable wildflower seed mix.
- Construction of log piles for invertebrates and reptiles.
- The installation of appropriate bat and bird boxes.
- The installation of a hibernacula for invertebrates.
- The installation of a Royal Hedgehog House.

These recommendations, including measures to protect and enhance Priority Habitats on site, should be included in a Biodiversity Management and Maintenance Scheme.

A Biodiversity Net Gain Assessment should be carried out for the site.

Further Survey Requirements

- Reptiles.

- Bats (Bat transects and deployment of automated bat detectors).
- Monitoring of badger setts.
- Hazel dormouse.

2. Introduction

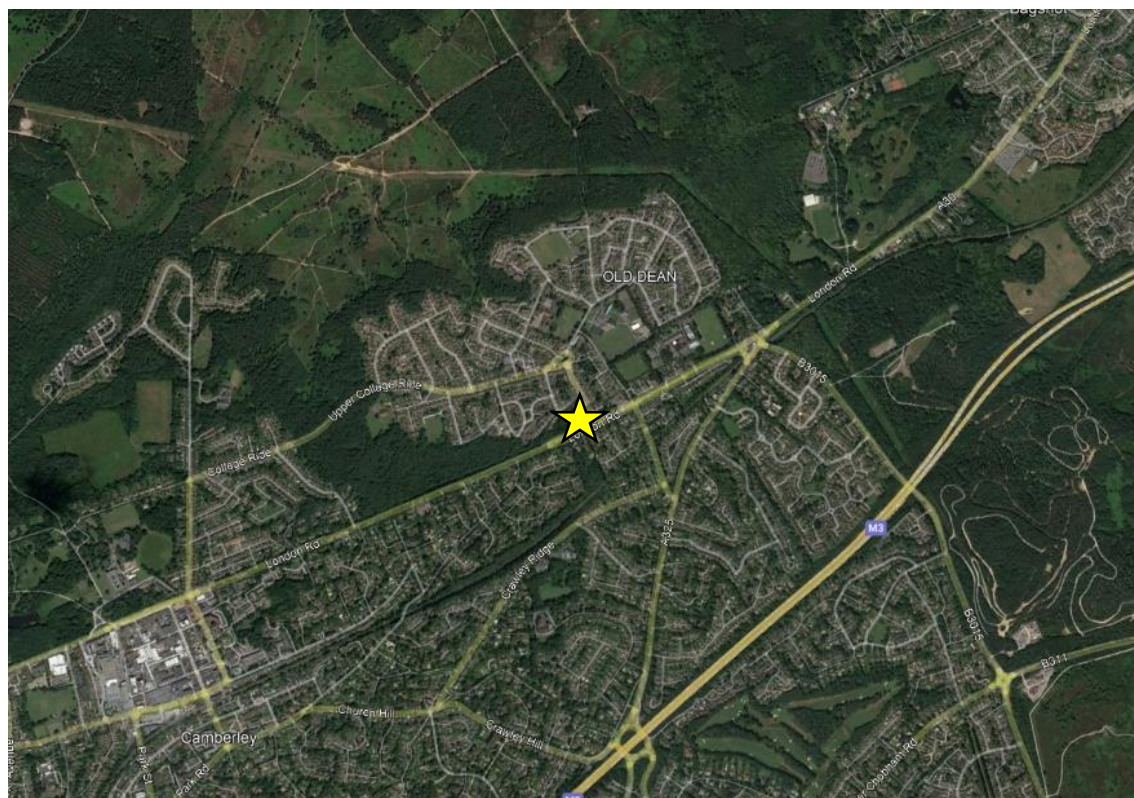
2.1 Site Details

Table 1 provides details of the site, intended as a summary of key features, derived from the data search and www.magic.gov.uk. The habitats recorded on site during the field survey are shown on Figure 1. Photographs of the site are provided in Appendix 1. A full species list, with target notes, is provided in Appendix 2.

Table 1. Site Details

Site Name	Diamond Ridge Woods, Camberley
Site Address	Diamond Ridge Woods, Caesar's Close, Camberley, GU15 4EB
OS Grid Reference	SU 8900 6156
Total Area of Site	0.386 ha
Landowner and Local Authority	Surrey Heath Borough Council
Geology and Soils	Freely draining, very acidic, sandy, and loamy soils
Hydrology	Freely draining
Nature Conservation Designations	None on site
Other Designations	None on site
The Woodland Trust Ancient and Notable Tree Inventory	None on site
Biodiversity Opportunity Area	Located within Surrey Biodiversity Opportunity Area TBH07: Camberley and Broadmoor Heaths
National Habitat Network	Network expansion zone
Primary Habitats	Other lowland mixed deciduous woodland, modified grassland, bramble scrub and developed land sealed surface
Protected Species	Roosting/foraging/commuting bats, badgers (<i>Meles meles</i>), hazel dormice (<i>Muscardinus avellanarius</i>), stag beetles (<i>Lucanus cervus</i>), amphibians, reptiles, breeding birds, and European hedgehogs (<i>Erinaceus europaeus</i>)
Current Land Use	Small woodland parcel including public footpaths

An aerial plan showing the location of the site is provided below.



Site Location (© Google Earth Pro, accessed 12th September 2022).

2.2 Site Context

Table 2 provides details on the context of the site in terms of habitats, land use and connectivity to the wider landscape.

Table 2. Site Context

Surrounding Habitats and Land Use	Located on the northern outskirts of Camberley; the surrounding landscape comprises extensive areas of urban development to the south as well as large areas of lowland heathland and woodland associated with Barossa Nature Reserve to the north. There is at least one waterbody located within 1 km of the site, located approximately 735 m north of the site.
Urban Context / Locality	The site is located off London Road on the outskirts of Camberley. The site can be accessed via footpaths adjacent to London Road or via an alleyway that leads off Lorraine Road to the north. The M3 is located approximately 1km to the south of the site.
Connectivity to Wider Landscape	The site has poor connectivity to the south but good connectivity to habitats associated with Barossa Nature Reserve to the north.
Priority Habitats within 1 km	<ul style="list-style-type: none"> • Deciduous woodland • Hedgerows • Lowland heathland • Ponds
Ancient Woodland within 1 km	None.
Non-Statutory Designated Sites within 1 km	<ul style="list-style-type: none"> • Black Hill SNCI • Penny Hill SNCI • College Common SNCI
Statutory Designated Sites within 1 km	Broadmoor to Bagshot Woods and Heaths SSSI, located approximately 555 m to the north of the site.
European Designated Sites within 5 km	Thames Basin Heaths SPA located approximately 555 m to the north of the site.
EPSLs within 2 km	<p>Three granted EPSLs for roosting bats:</p> <ul style="list-style-type: none"> • Destruction of a resting place for common pipistrelles (<i>Pipistrellus pipistrellus</i>) and brown long-eared bats (<i>Plecotus auritus</i>) located approximately 660 m to the south-west of the site. • Destruction of resting place for brown long-eared bats located approximately 1.75 km to the south. • Destruction of a resting place for common pipistrelle, soprano pipistrelle (<i>Pipistrellus pygmaeus</i>) and serotine (<i>Eptesicus serotinus</i>) bats located approximately 2 km to the south.

2.3 Proposed Development

The development proposals are for a change of land use to provide a traveller site comprising four pitches.

2.4 Brief and Objectives

2.4.1 Preliminary Ecological Appraisal

- Map and identify the existing habitats within the survey area, using the UK Habitat Classification (UKHab) system.
- Check for evidence of protected species and assess the potential for protected species to be present on site.
- Check for evidence of invasive species.
- Identify potential ecological impacts and constraints relating to the proposed works.

- Make recommendations for further survey work, as appropriate.
- Propose mitigation measures to avoid, mitigate or compensate for ecological impacts, as appropriate.

3. Relevant Legislation and Planning Policy

This section provides a summary of legislation and planning policy for designated sites, Priority Habitats, ancient woodland, trees, and protected species, which are assessed to be present or potentially present on site, as detailed in Table 7, Section 6.

The legislation and planning policy detailed in this section is intended to be a summary only. The relevant pieces of legislation and planning policy should be referred to for full information. Legislation and planning policy pertaining to protected habitats and species can be found at the following websites:

- The Birds Directive 2009/147/EC:
http://ec.europa.eu/environment/nature/legislation/birdsdirective/index_en.htm
- The Habitats Directive 1992/43/EEC:
http://ec.europa.eu/environment/nature/legislation/habitatsdirective/index_en.htm
- Water Directive Framework: https://ec.europa.eu/environment/water/water-framework/info/intro_en.htm
- Wildlife and Countryside Act, 1981 (as amended):
<http://www.legislation.gov.uk/ukpga/1981/69>
- Conservation of Habitats and Species Regulations, 2017 (as amended):
http://www.legislation.gov.uk/uksi/2010/490/pdfs/uksi_20100490_en.pdf
- Countryside Rights of Way Act, 2000: <http://www.legislation.gov.uk/ukpga/2000/37/contents>
- Natural Environment and Rural Communities Act, 2006:
<http://www.legislation.gov.uk/ukpga/2006/16/contents>
- National Planning Policy Framework, 2021:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf
- OPDM Circular 06/2005 Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7692/147570.pdf
- Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69446/pb13583-biodiversity-strategy-2020-111111.pdf
- Surrey Heath Borough Council Core Strategy & Development Management Policies 2011-2028: <https://www.surreyheath.gov.uk/residents/planning/planning-policy/surrey-heath-current-local-plan/core-strategy-and-development>
- Biodiversity & Planning in Surrey:
<https://surreynaturepartnership.files.wordpress.com/2019/10/biodiversity-planning-in-surrey-revised-post-revision-nppf-mar-2019.pdf>

The valued ecological receptors, which could be impacted on by development are highlighted in blue in Table 3 and further details on relevant legislation and planning policy are provided in Appendix 3. A list of abbreviations is provided in Appendix 4.

3.1 Legislation and Planning Policy Relating to Valued Ecological Receptors

Table 3. Legislation and Planning Policy Relating to Valued Ecological Receptors

Key Ecological Receptor	Legislation and Planning Policy										
	Annex I (Habitats) Habitats Directive, EC Council Directive 92/43/EEC	Annex II (Species) Habitats Directive, EC Council Directive 92/43/EEC	Annex I of Birds Directive 2009/147/EC	Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019	The Wildlife and Countryside Act, 1981 (as amended), Schedules 1, 5, 9	Countryside and Rights of Way Act, 2000	The Protection of Badgers Act, 1996	NERC Act, 2006	NPPF	Relevant Regional Planning Policy	Relevant Local Planning Policy: Guildford Local Plan and 'Biodiversity and Planning in Surrey'
Statutory Designated Sites – SACs and SPAs	✓	✓		✓					✓		✓
Statutory Designated Sites – SSSIs					✓	✓			✓		✓
Statutory Designated Sites – LNRs									✓		✓
Non-Statutory Designated Sites – SNCIs, LWSs							✓	✓			✓
Priority Habitats							✓	✓			✓
Ancient Woodland								✓			✓
Trees											✓
Priority Species – Plants							✓				✓
Invasive Plant Species					✓ (Schedule 9)						✓
Priority Species – Invertebrates							✓	✓			✓

Key Ecological Receptor	Legislation and Planning Policy										
	Annex I (Habitats) Habitats Directive, EC Council Directive 92/43/EEC	Annex II (Species) Habitats Directive, EC Council Directive 92/43/EEC	Annex I of Birds Directive 2009/147/EC	Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019	The Wildlife and Countryside Act, 1981 (as amended), Schedules 1, 5, 9	Countryside and Rights of Way Act, 2000	The Protection of Badgers Act, 1996	NERC Act, 2006	NPPF	Relevant Regional Planning Policy	Relevant Local Planning Policy: Guildford Local Plan and 'Biodiversity and Planning in Surrey'
Great Crested Newts (<i>Triturus cristatus</i>)		✓		✓	✓ (Schedule 5)			✓	✓		✓
Common Toads (<i>Bufo bufo</i>)								✓	✓		✓
Reptiles					✓			✓	✓		✓
Breeding Birds					✓				✓		✓
Priority Species – Birds								✓	✓		✓
Protected Bird Species					✓ (Schedule 1)				✓		✓
Roosting, Foraging and Commuting Bats		✓		✓	✓ (Schedule 5)			✓	✓		✓
Hazel Dormouse		✓		✓	✓ (Schedule 5)			✓	✓		✓
Badger					✓		✓				✓
European Hedgehog								✓	✓		✓
Brown hare (<i>Lepus europaeus</i>)								✓			✓
European Otter (<i>Lutra lutra</i>)		✓		✓	✓ (Schedule 5)			✓	✓		✓

Key Ecological Receptor	Legislation and Planning Policy										
	Annex I (Habitats) Habitats Directive, EC Council Directive 92/43/EEC	Annex II (Species) Habitats Directive, EC Council Directive 92/43/EEC	Annex I of Birds Directive 2009/147/EC	Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019	The Wildlife and Countryside Act, 1981 (as amended), Schedules 1, 5, 9	Countryside and Rights of Way Act, 2000	The Protection of Badgers Act, 1996	NERC Act, 2006	NPPF	Relevant Regional Planning Policy	Relevant Local Planning Policy: Guildford Local Plan and 'Biodiversity and Planning in Surrey'
Water Vole (<i>Arvicola amphibius</i>)					✓ (Schedule 5)			✓	✓		✓

3.2 Biodiversity Enhancements

The NPPF, 2021 sets out policies for, inter alia, biodiversity and geological conservation directing those schemes should seek to protect and enhance, where possible, designated, and non-designated nature conservation sites and features.

Section 41 of the NERC Act, 2006 requires public bodies “to have regard to” the importance of conserving biodiversity in England when undertaking their functions. Local planning authorities should use the list of species and habitats of principal importance (section 41) to identify those that require special consideration when making decisions.

Circular 06/05 on Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within the Planning System provides administrative guidance on the application of the law relating to planning and nature conservation as it applies in England.

The following is a summary of relevant local planning policy and guidance, which relates to biodiversity enhancement and the achievement of biodiversity net gain on development sites.

3.2.1 Surrey Heath Borough Council Core Strategy & Development Management Policies 2011-2028

‘The Borough Council will seek to conserve and enhance biodiversity within Surrey Heath. Working with partners, new opportunities for habitat creation and protection will be explored in particular on biodiversity opportunity areas. Development that results in harm to or loss of features of interest for biodiversity will not be permitted.

Particular regard will be had to the following hierarchy of important sites and habitats within the Borough (as identified upon the Proposals Map):

- (i) Special Protection Areas (SPA) and Special Areas of Conservation (SAC) (European)*
- (ii) Sites of Special Scientific Interest (SSSI) and National Nature Reserves (National)*
- (iii) Sites of Nature Conservation Importance (SNCI), Local Nature Reserves (LNR), other Ancient Woodland not identified in (ii) above (Local).*

Outside of these areas, new development will where appropriate be required to contribute to the protection, management and enhancement of biodiversity. On locally designated sites this will include those habitats and species listed in the Surrey Biodiversity Action Plan (BAP).

Within locally designated sites development will not be permitted unless it is necessary for appropriate on site management measures and can demonstrate no adverse impact to the integrity of the nature conservation interest. Development adjacent to locally designated sites will not be permitted where it has an adverse impact on the integrity of the nature conservation interest.

The Council will work in partnership to restore and enhance Biodiversity Opportunity Areas in particular those also designated as SPA or SAC which are of strategic importance.’

CP14B European Sites

‘The Council will only permit development where it is satisfied that this will not give rise to likely significant adverse effect upon the integrity of the Thames Basin Heaths Special Protection Area and/or the Thursley, Ash, Pirbright & Chobham Common Special Area of Conservation.

All new residential (net) development within 5km of the Thames Basin Heaths Special Protection Area is considered to give rise to the possibility of likely significant effect. Accordingly, only new development that complies with the following requirements will be permitted.

- (i) *No (net) new residential development will be permitted within 400m of the SPA.*
- (ii) *Non-residential development within 400m of the SPA will be required to demonstrate that it is not likely to have a significant effect either alone or in combination with other plans or projects.*

Proposals for residential development elsewhere in the Borough will be required to provide appropriate measures to avoid adverse effects upon the Thames Basin Heath Special Protection Area in accordance with the Borough Councils adopted Avoidance Strategy (or as subsequently amended)

Such measures shall include:

- (iii) *All net new residential development shall provide or contribute toward the provision of Suitable Alternative Natural Greenspaces (SANGs).*
- (iv) *SANGS will be provided at a standard of at least 8ha per 1,000 new occupants.*
- (v) *Developments of 10 or more net new dwellings will only be permitted within the identified catchment areas of SANGs.*
- (vi) *All net new residential development shall contribute toward strategic access management and monitoring (SAMM) measures.*

The effective avoidance of any identified adverse effects must be demonstrated and secured prior to approval of the development.'

3.2.2 Biodiversity and Planning in Surrey

4c (Biodiversity within developments) states that *'developments are being built to ever-increasing environmental standards, and biodiversity should not be forgotten here. There are very simple steps that can be taken to provide nesting and roosting opportunities for species such as bats and birds within buildings. Nest boxes can be mounted on the outside of buildings, special bat or Swift bricks can be incorporated into the structure, and entire roof spaces can be designed to provide opportunities for bats to roost. A step further is to provide a 'green', or vegetated, roof, which can provide foraging opportunities for birds, and support a range of native plants. Thought should be given to the impact of lighting on wildlife, especially bats; areas of no or low level lighting along bat foraging routes should be considered'*.

It also states that *'appropriate landscaping within developments can help reduce fragmentation of habitats by allowing wildlife to live within and move through built areas to the wider countryside. Landscaping should aim to retain and enhance existing biodiversity features'*.

It encourages the use of native species, and consideration of using ponds and hedgerows in landscaping to link up areas supporting biodiversity.

3.3 Surrey Biodiversity Opportunity Areas

The creation of habitats of principal importance to link existing fragmented habitats is an important aspect of conservation highlighted through the Biodiversity Opportunity Areas (BOAs) initiative (Surrey Nature Partnership, 2015). BOAs represent areas where improved habitat management, as well as efforts to restore and recreate habitats of principal importance will be most effective in enhancing connectivity to benefit the recovery of species of principal importance in a fragmented landscape. There are 50 BOAs covering 39% of Surrey and Policy Statements have been drafted for each.

The site lies within the Thames Basin Heaths BOA TBH07 – Camberley & Broadmoor Heaths. The BOA Area Policy Statement aims, and justification is to establish a strategic framework for conserving and enhancing biodiversity at a landscape scale, particularly focusing on the restoration and creation of Priority Habitats, including heathland, acid grassland, mixed deciduous woodland, wet woodland, and fen.

4. Methods

This report has been produced with reference to current guidelines for Preliminary Ecological Appraisals (CIEEM, 2017) and BS42020:2013: Biodiversity – Code of Practice for Planning and Development.

4.1 Data Search

Surrey Biodiversity Information Centre (SBIC) was contacted to provide a data search report for the site and land within 1 km of the site boundary (comprising information on protected species, species of conservation concern and statutory and non-statutory designated sites). The following published materials were also consulted:

- The Multi-Agency Geographical Information for the Countryside (www.magic.gov.uk) (accessed 13th September 2022).
- Section 41: Priority Species in England (NERC Act, 2006) (www.jncc.defra.uk, accessed 13th September 2022).
- Surrey Heath Borough Council Core Strategy & Development Management Policies 2011-2028 (accessed 13th September 2022).

4.2 Field Survey

A field survey, using the UKHab system was undertaken of the site by Josh Brown BSc (Hons) on 2nd September 2022. The weather conditions during the survey were dry, 17°C, wind force 1, and 100% cloud cover. The site boundary is shown in Figure 1.

The field survey technique used is detailed in the UK Habitat Classification User Manual, Version 1.0. The UK Habitat Classification Working Group, May 2018. The principle aim of the UK Habitat Classification (UKHab) system is to provide a rapid system for recording and classifying habitats, which can be used for both earth-based and field-based surveys. The system comprises a principal hierarchy (the Primary Habitats), which include ecosystems, broad habitats, Priority Habitats and Annex 1 habitats, and non-hierarchical Secondary Codes.

The UKHab 'Professional Edition' has been used, with the use of Level 5 Primary Habitats and Secondary Codes, as detailed in the UK Habitat Classification-V1 (May 2018) Excel workbook. Primary Habitats and Secondary Codes follow the UK Habitat Classification – Habitat Definitions – V1.0 (May 2018). The Secondary Codes selected are appropriate to the site and habitats recorded. The Minimum Mapping Unit used is 25 m² and 5 m in length.

Where possible, prior to carrying out the field survey, habitats on site were identified using www.magic.gov.uk, Google Earth Pro, 2020 and previous surveys reports, if available. Pre-survey maps were compiled using QGIS 3.16 Hannover. Evidence of habitat management was also noted.

During the field survey, habitat types were recorded using QField on a tablet (Samsung Galaxy Tab S6). GIS symbology used is as recommended in the UK Habitat Classification symbology files for QGIS, presented as Level 4 Primary Habitat, with Level 5 labelled as a code.

4.3 Protected Species Assessment

As part of the PEA, the site was assessed for its potential to contain protected or notable species. The assessment was made based on the habitats present within the site and their suitability for protected species (information on the legislation of protected species can be found in Section 3 and Appendix 4). Protected species assessed for, but not limited to, were:

- Plants of conservation concern.
- Invertebrates of conservation concern.
- Great crested newts.
- Common toad.
- Reptiles.
- Breeding birds.
- Bats.
- Hazel dormice.
- Badgers.
- European hedgehog.
- Brown hare.
- Otters.
- Water voles.

In addition, a search was undertaken for evidence of non-native, invasive species.

4.4 Survey Limitations

The data search should not be taken as a definitive list of the protected species and species of conservation concern that occur within the search area.

The site was visited over the period of one day, as such seasonal variations cannot be observed and only a selection of all species that potentially occur within the site have been noted. Therefore, the survey provides a general assessment of potential nature conservation value.

The field survey was undertaken at the optimal time of year. There were no limitations to the survey in terms of the following:

- The site could be fully accessed.
- Weather conditions (dry and cloudy).
- Personal competence (qualifications, training, skills, and experience).
- Time spent surveying.

Multiple badger sett entrances were recorded on site. However, as some areas of the site comprise dense scrub, this vegetation could potentially conceal additional badger sett entrances. Further survey for badgers, as recommended in this report, should ensure that all areas of the site are searched for badger setts.

5. Baseline Ecological Conditions

5.1 Data Search

5.1.1 Designated Sites

The site is not located within or directly adjacent to a designated site for nature conservation. However, the Thames Basin Heaths SPA is located approximately 555 m to the north of the site, which also encompasses Broadmoor to Bagshot Woods and Heaths SSSI. There are also three non-statutory designated sites for nature conservation located within 1 km of the site.

Table 4 provides details on designated sites, which are present within 1 km of the site.

Table 4. Designated Sites within 1 km of the Site

Site Name and Designation	Central Grid Reference	Approximate Distance from Site (m)	Area (Ha) / Length (KM)	Description
Thames Basin Heaths SPA	SU 878 640	555	8309.50	The site consists of tracts of heathland, scrub, and woodland, once almost continuous, but now fragmented into separate blocks by roads, urban development and farmland. Regularly used by 1% or more of the Great Britain populations of the following species listed in Annex 1 in any season: nightjar (<i>Caprimulgus europaeus</i>); 7.8% Great Britain population, woodlark (<i>Lullula arborea</i>); 9.9% Great Britain population, Dartford warbler (<i>Sylvia undata</i>); 27.8% Great Britain population.
Broadmoor to Bagshot Woods and Heaths SSSI	SU 877 640	555	1696.33	This site has an extensive mosaic of broadleaved woodland, coniferous plantation, dry and wet heathland, valley mire, a series of base-poor ponds and a scarce breeding invertebrate assemblage. The site includes the valley bogs of Broadmoor Bottom and Wishmoor Bottom which form the most important remaining examples of this type of habitat in the area.
Black Hill SNCI	SU902618	800	37.1	The site is selected for its small areas of heathland including H3 <i>Ulex minor-Agrostis curtisii</i> heath, a community uncommon in Surrey and for the woodland which has the potential to be restored to heath. Two red data list plants; corn spurrey (<i>Spergula arvensis</i>) and Heath cudweed (<i>Gnaphalium sylvaticum</i>) and the Surrey scarce bristle bent (<i>Agrostis curtisii</i>) have been recorded on the site. Hobby (<i>Falco subbuteo</i>) a bird of conservation concern in Surrey, has been reported breeding on the site. The site forms part of a corridor of SNCIs linking Broadmoor to Bagshot Heath SSSI with Colony Bog and Bagshot Heath SSSI (2 sections of the Thames Basin Heaths SPA).

Site Name and Designation	Central Grid Reference	Approximate Distance from Site (m)	Area (Ha) / Length (KM)	Description
Penny Hill SNCI	SU896623	773	23.4	The site is selected for its heathland and remnant heathland vegetation. This site is an important buffer zone and may provide nesting areas for birds. Silver studded blue (<i>Plebejus argus</i>) butterflies have been recorded on the site.
College Common SNCI	SU880615	710	12.9	The site is selected for its heathland habitat. Much of the woodland was originally heathland and has the potential to be restored to heath. The heathland in Area (3) blends almost seamlessly with the SSSI, and it is likely that birds and other animals of the SSSI visit the site. It also forms an important buffer between two housing estates and the rest of Camberley below the London Road.

5.1.2 Ancient Woodland

The site is not located within an area of ancient woodland or plantation on ancient woodland. There are also no parcels of ancient woodland located within 1 km of the site.

5.1.3 Priority Habitats

Four types of Priority Habitats are located within 1 km of the site, as detailed in Table 5.

Table 5. Priority Habitats within 1 km of the Site

Habitat Type	Approximate Number of Land Parcels	Nearest Land Parcel to Site (Approximate m)
Deciduous woodland	17	0 (on site)
Hedgerows	Unknown	40
Lowland heathland	2	568
Pond	1	735

5.1.4 Protected Species and Species of Conservation Concern

Examples of protected species and species of conservation recorded in the data search from the previous 10 years, which could potentially occur on, or in the vicinity of the site are provided below. The data search report should be referred to for the full list of species, which occur within 1 km of the site.

- Adder (*Vipera berus*).
- Bats (*Chiroptera*).
- Common lizard (*Zootoca vivipara*).
- English bluebell (*Hyacinthoides non-scripta*).
- Slow worm (*Anguis fragilis*).
- West European hedgehog (*Erinaceus europaeus*).

The following invasive species have been recorded within 1 km of the site:

- Eastern grey squirrel (*Sciurus carolinensis*).
- Himalayan cotoneaster (*Cotoneaster simonsii*).
- Montbretia (*Crocsmia pottsii x aurea = C. x crocosmiiflora*).

5.2 Field Survey – Habitats

The results of the field survey undertaken on 2nd September 2022 are presented in map form on Figure 1 and described in Table 6. Priority Habitats are in bold, where applicable. Photographs of the site are provided in Appendix 1 and a full list of species, with scientific names, is provided in Appendix 2. The following habitats (Level 5 Primary Habitat labels and codes, where applicable) were recorded on site:

- Modified grassland – g4.
- Other lowland mixed deciduous woodland – w1f7
- Bramble scrub – h3d.
- Developed land; sealed surface – u1b.

Table 6. Results of Field Survey – Habitats

Primary Habitat Level 4 Label and Code	Primary Habitat Level 5 Label and Code	Approximate Area (ha) / Length (m)	Location in Site	Main Common Plant Species	Rare/Scarce or Protected Plant Species	Secondary Code – Habitat Mosaic	Secondary Code – Habitat Complex	Secondary Code – Management	Secondary Code – Environmental Qualifier	Secondary Code – Species Feature	Secondary Code – Green Infrastructure	Signs of and Potential for Protected Species
Modified grassland – g4	N/A	0.038 ha	A narrow strip of modified grassland forms the southern site boundary where it abuts London Road. The grassland is species-poor and comprises a short-mown footpath and an unmanaged verge, including areas of scattered scrub and tall ruderal vegetation.	Broad-leaved dock, cock's-foot, false oat-grass, common ragwort	None recorded	Scattered scrub (10) Tall herb (16)	N/A	Mown (64)	Acidic substrate (135)	Sward type mosaic (160)	Green access route (420)	Potential for reptiles, amphibians, and European hedgehogs

Primary Habitat Level 4 Label and Code	Primary Habitat Level 5 Label and Code	Approximate Area (ha) / Length (m)	Location in Site	Main Common Plant Species	Rare/Scarce or Protected Plant Species	Secondary Code – Habitat Mosaic	Secondary Code – Habitat Complex	Secondary Code – Management	Secondary Code – Environmental Qualifier	Secondary Code – Species Feature	Secondary Code – Green Infrastructure	Signs of and Potential for Protected Species
Lowland mixed deciduous woodland – w1f	Other lowland mixed deciduous woodland – w1f7	0.333 ha	Forms the majority of the site comprising a good mixture of native deciduous trees on acidic, sandy soils. The woodland floor comprises uneven terrain with a west-facing slope leading into a large depression at the centre of the site. A footpath runs from the northern boundary leading to further areas of woodland to the west.	Canopy: ash, beech, English oak, Scot's pine, sweet chestnut, silver birch, sycamore Understorey: hawthorn, hazel, holly, laurel, rowan Ground layer: bracken, bramble	English bluebell	Scattered scrub (10) Scattered bracken (12)	N/A	N/A	Acidic substrate (135)	N/A	Green access route (420)	Potential for nesting birds, roosting/ foraging/commuting bats, reptiles, amphibians, and European hedgehogs Multiple badger sett entrances were recorded on site. Cotoneaster was recorded at target note 1 on Figure 1. An ivy-clad tree with low potential for roosting bats was recorded at target note 2 on Figure 1.
Bramble scrub – h3d	N/A	0.01 ha	A small section of dense bramble scrub is located on the southern woodland edge where it abuts the footpath.	Bramble, bracken	None recorded	Scattered bracken (12)	N/A	N/A	Acidic substrate (135)	N/A	N/A	Potential for nesting birds, foraging/commuting bats, reptiles, amphibians, and European hedgehogs
Developed land; sealed surface – u1b	N/A	0.004 ha	A small area of gravel hard standing is located on the eastern woodland boundary where it abuts Caesar's Close.	N/A	None recorded	N/A	N/A	N/A	N/A	N/A	N/A	None recorded

5.3 Field Survey – Species

The following fauna was recorded during the survey:

Birds:

- Blue tit.
- Robin.
- Wood pigeon.

6. Ecological Constraints and Opportunities Assessment

Table 7 sets out known and potential ecological constraints to development, derived from the data search and field survey, including designated sites, ancient woodland, Priority Habitats, and protected species/species of conservation concern. Where a potential ecological constraint has been identified, further survey work and/or appropriate avoidance, mitigation, and compensation (as appropriate) is likely to be required to address the issue. **Further survey and/or mitigation measures are required for the valued ecological receptors highlighted in blue.**

Table 7. Ecological Constraints and Opportunities Assessment

Valued Ecological Receptor	Potentially Present / Known to be Present on Site	Assessment and Justification for Potential/Likely Impacts of Development on Value Ecological Receptor
Designated Sites	Thames Basin Heaths SPA & Broadmoor to Bagshot Woods and Heaths SSSI located approximately 555 m from the site	<p>The site is not located within or directly adjacent to a designated site for nature conservation. However, Thames Basin Heaths SPA is located approximately 555 m to the north of the site, which also encompasses Broadmoor to Bagshot Woods and Heaths SSSI.</p> <p>In the absence of avoidance and mitigation measures, construction and development operation activities could result in adverse ecological effects on the Thames Basin Heaths SPA, which has therefore been addressed in Section 7.1.</p> <p>There are also three non-statutory designated sites for nature conservation located within 1 km of the site.</p> <p>The development should not result in significant adverse impacts on non-statutory designated sites for nature conservation for the following reasons:</p> <ul style="list-style-type: none"> • The proposed development site is separated from the nearest locally designated site by 710 m of existing residential development and woodland. • The proposed development will be confined to the site and impacts will be confined to habitats within the site. • The proposed development will comply with legislation relevant to reducing the impacts of construction, namely the Control of Pollution Act, 1974, the Environmental Protection Act, 1990, The Clean Air Act, 1993, The Environment Act, 1995 and the Pollution Prevention and Control Act, 1999. • The proposed development will conform to British Standards on noise and vibration (BS 5228-2009. Code of Practice for Noise and Vibration Control on Construction and Open Sites).

Valued Ecological Receptor	Potentially Present / Known to be Present on Site	Assessment and Justification for Potential/Likely Impacts of Development on Value Ecological Receptor
		For the above reasons, locally designated sites for nature conservation should not be impacted upon by the development and further survey and avoidance/mitigation measures are not required in relation to the proposed development and non-statutory designated sites.
Priority Habitats	Present on site	The site comprises other lowland mixed deciduous woodland, which is a Priority Habitat. Further areas of deciduous woodland are located directly adjacent to the site. Providing the measures recommended in Section 7.2 are strictly adhered to, it should be possible to avoid significant adverse ecological effects on Priority Habitats.
Ancient woodland	None present	The site is not located within an area of ancient woodland or plantation on ancient woodland and there are no areas of ancient woodland located within 1 km of the site. Therefore, further survey and avoidance/mitigation measures are not required in relation to the proposed development and ancient woodland.
Trees	Present on site	Mature native trees are located on site. In the absence of avoidance and mitigation measures, construction and development operation activities could result in significant adverse effects on trees. Recommendations for avoidance and mitigation measures relating to trees have, therefore, been provided (see Section 7.3).
Plants of conservation concern	Present on site	<p>The English bluebell was recorded on site. The English bluebell is protected from picking with the intention to sell under schedule 8 of the Wildlife and Countryside Act (1981) but intentional destruction is not covered where the site owner has given permission.</p> <p>No other protected or notable rare plant species were noted during the field survey. Providing the measures recommended in Section 7.2 are strictly adhered to, it should be possible to avoid significant adverse ecological effects on English bluebells.</p> <p>There are opportunities for biodiversity enhancements on site, including the creation of habitats, which could support a higher diversity of plant species (see Section 9).</p>
Invasive plant species such as rhododendron, Japanese knotweed (<i>Reynoutria japonica</i>) and giant hogweed (<i>Heraclium mantegazzianum</i>)	Present on site	Cotoneaster (see target note 1 on Figure 1) and variegated yellow archangel were recorded on site, both of which, are listed under Schedule 9 of the Wildlife and Countryside Act, 1981 (as amended). As it is an offence to cause invasive species to spread in the wild, recommendations to eradicate and dispose of cotoneaster and variegated yellow archangel have been provided in Section 7.4.
Invertebrates of conservation concern	Potential for stag beetles	The woodland and scrub habitats on site have potential to support the stag beetle, which is a Priority Species. Therefore, avoidance measures relating to stag beetles have been provided in Section 7.5.

Valued Ecological Receptor	Potentially Present / Known to be Present on Site	Assessment and Justification for Potential/Likely Impacts of Development on Value Ecological Receptor
Great crested newts	Low potential	<p>For the following reasons, it is considered that there is a low possibility that great crested newts could be present on site:</p> <ul style="list-style-type: none"> • There are no ponds on site. • The nearest pond to the site (as shown on www.magic.gov.uk) is approximately 735 m to the north of the site, separated from the site by existing residential development and woodland. • The geology of the site comprises acidic, sandy soils which are of lower suitability for great crested newts. • The great crested newt was not recorded in the data search. • The nearest granted EPSL for great crested newts is located 3.5 km to the north of the site. • The site comprises habitats which could support the great crested newt in its terrestrial phase. <p>Therefore, it is considered appropriate to take a precautionary approach to ensure great crested newts are not harmed during the works, in the unlikely event that they are encountered (see recommendations in Section 7.6).</p>
Common toads	Low potential	<p>For the same reasons given for great crested newts, it is considered possible that common toads are present within the site. Recommendations for avoidance and mitigation measures relating to common toads have, therefore, been provided (see Section 7.6).</p>
Reptiles (such as slow worms- <i>Anguis fragilis</i> , common lizards - <i>Zootoca vivipara</i> , and grass snakes- <i>Natrix helvetica</i>)	Potentially present	<p>There woodland and scrub habitats on site could support common species of reptiles. The adder, common lizard and slow worm were also recorded in the data search. As reptiles are protected against killing and injury, and could be impacted on by the development proposals, further survey for reptiles is required (see Section 8.1).</p>
Nesting birds	Potentially present	<p>The site comprises woodland and scrub, which could support common species of nesting birds. As nesting birds are protected, recommendations to avoid disturbing nesting birds are provided in Section 7.7.</p>
Birds of conservation concern (such as barn owl – <i>Tyto alba</i> , peregrine falcon – <i>Falco peregrinus</i> and black redstart – <i>Phoenicurus ochruros</i>)	Potentially present	<p>Birds of conservation concern could potentially breed on site. Avoidance measures for breeding birds are provided in Section 7.7, which also relate to birds of conservation concern.</p>
Bats	Woodland habitats on site could support roosting, foraging and commuting bats	<p>There are no buildings on site with potential to support roosting bats. One tree has been assessed as having low potential to support roosting bats (see target note 2 on Figure 1). Further survey for trees with low potential to support roosting bats is not required (Collins, 2016).</p> <p>The woodland and scrub habitats on site have high potential to support foraging/commuting bats. As the development proposals could impact on suitable foraging/commuting habitats for bats, a sensitive lighting plan has been recommended in Section 7.8 and further survey for foraging and commuting bats is recommended in Section 8.2.</p>

Valued Ecological Receptor	Potentially Present / Known to be Present on Site	Assessment and Justification for Potential/Likely Impacts of Development on Value Ecological Receptor
		There are opportunities for biodiversity enhancements on site, including the incorporation of features for bats (see Section 9).
Badger	Active setts on site	Badger setts and evidence of badger foraging was recorded on site. Further information on the status of the setts is required, to help inform the proposals and determine whether a licence from Natural England will be required. For these reasons, further survey for badgers has been recommended in Section 8.3.
Hazel dormouse	Potentially present	The site has potential to support hazel dormice. Measures to protect the site, as given in Section 7.2, will help protect hazel dormice habitats. Further survey for hazel dormice is recommended in Section 8.4, to help inform the detail of the proposals, to ensure that hazel dormice and their habitats are fully protected, and to inform further measures to minimise disturbance to hazel dormice during both construction and operation.
Brown hare	Negligible potential	The site does not contain any habitats, which could support the brown hare, i.e., agricultural fields and open pasture. Therefore, the brown hare is considered to be absent from the site, and further survey and avoidance/mitigation measures are not required in relation to the proposed development and brown hares.
Water vole and European otter	Negligible potential	The site does not contain any habitats, which could support the water vole and European otter, i.e., rivers and streams. Therefore, the water vole and European otter are considered to be absent from the site, and further survey and avoidance/mitigation measures are not required in relation to the proposed development and water voles and European otters.
European hedgehog	Potentially present	The woodland and scrub habitats on site could support the European hedgehog, which is a Priority Species. The European hedgehog was also recorded in the data search. As the European hedgehog could be present in areas of the site, which would be impacted on by the proposals, avoidance measures for European hedgehogs have been recommended in Section 7.5, in accordance with the duty placed on Local Planning Authorities to have due regard for biodiversity.

7. Recommendations for Avoidance and Mitigation

7.1 Designated Sites

The site is located 555 m south of the Thames Basin Heaths SPA. This is outside of the 400 m buffer zone where no new residential development is permitted, but within 5 km. Housing developments, where there is a net gain of one or more houses, within 5 km of the Thames Basin Heaths SPA are required to contribute towards avoidance measures (Suitable Alternative Natural Greenspace, SANG and Strategic Access Management and Monitoring, SAMM), to offset the likely significant effects on the SPA. For developments of fewer than 100 new dwellings, it should be possible to use Council-provided SANGs, subject to availability.

7.2 Priority Habitats

Other lowland mixed deciduous woodland, which is a Priority Habitat, which is located within the boundary of the TBH07 BOA, forms the majority of the site. The following avoidance and mitigation measures relating to Priority Habitats are strongly recommended. These recommendations should be adhered to following the conclusion of further surveys for protected species as outlined in Section 8 of this report.

- Woodland on site should be retained, protected, and enhanced. Any woodland lost should be replaced (offsite) with like-for-like or better habitat and aim to contribute to the objectives and targets of the BOA. This should be informed by a Biodiversity Net Gain assessment.
- Where removal of trees is required to facilitate the new traveller pitches, areas of the site that comprise poorer quality woodland should be selected. For example, woodland comprising a sparse cover of young growth trees, which lack an established understorey and diverse ground layer, should be favoured.
- Buffer zones should be implemented between the location of the traveller pitches and retained woodland. There should be no direct access from the development into the woodland. The buffer should only be accessed for maintenance and materials/waste should not be stored in or near the buffer.
- Retained areas of woodland should be enhanced by planting native trees, shrubs, and bulbs, of local provenance and suited to the geology of the site. Any laurel on site should be removed in order to increase light penetration onto the woodland floor and enhance species diversity of the ground layer.
- The proposals should not include planting of ornamental or otherwise non-native tree, shrub, and ground flora species.
- All brash and log piles should be retained and protected. All fallen and standing wood should be retained and protected.
- A sensitive lighting plan should be adopted, to ensure that outside lighting does not adversely affect adjacent habitats and wildlife, particularly bats when foraging and commuting (see Section 7.8).

7.3 Trees

Native trees should be retained, and any trees lost as a result of the proposed development, should be replaced with equivalent numbers of native species.

To prevent damage to retained trees during development, a buffer zone should be put in place to protect the rooting area (Root Protection Area, which is calculated in accordance with British Standard 5837, 'Trees in Relation to Construction'), in which no construction activities should be permitted.

7.4 Invasive Plants

Cotoneaster (see target note 1 on Figure 1) and variegated yellow archangel were recorded on site. When these species escape into the wild, they can be detrimental to native habitats as it out-competes native plants that are beneficial for wildlife. Eradication of these species, prior to site clearance is required in order to avoid committing an offence. Further information on how to prevent cotoneaster and variegated yellow archangel from spreading and how to dispose of them, can be found at <https://www.gov.uk/guidance/prevent-the-spread-of-harmful-invasive-and-non-native-plants#types-of-invasive-non-native-plants>.

7.5 Stag Beetles and European Hedgehogs

An Ecological Clerk of Works (ECoW) should be present on site during any site clearance activities, which are likely to involve the removal/disturbance of any vegetation, particularly the scrub and any brash/log piles on site. Any stag beetles or European hedgehogs found, should be allowed to move away into adjacent habitats unharmed, of their own accord.

7.6 Amphibians

As a precautionary approach to ensure great crested newts and common toads are not harmed during the proposed works, it is recommended that a fingertip search of the works area is carried out by a great crested newt licenced ecologist immediately prior to the commencement of the works, to search for great crested newts and other amphibians. An ECoW should be present on site during any site clearance activities, which are likely to involve the removal/disturbance of any vegetation, as well as the removal of the brash piles.

If a great crested newt is found during the search, works would need to cease immediately and an EPSP for great crested newts should be obtained from Natural England before works continue.

7.7 Nesting Birds

If works which are likely to damage bird nests need to be carried out during the nesting period, there is potential that nesting birds could be harmed and disturbed. To ensure legal compliance, a check should be undertaken by an ecologist within 48 hours of works commencing, to confirm the presence/absence of nest sites. If nests sites are identified, works to that feature should be delayed until the nest site becomes inactive (species specific, but approximately 4-6 weeks maximum).

7.8 Bats

Recommendations to minimise the potential impacts of artificial external lighting on bat activity, are provided below (Institute of Ecology and Environmental Management, 2006: Institute of Lighting Engineers, 2007 and Bat Conservation Trust, 2018):

- Avoid prolonged use of outside lighting during the period dusk to dawn, particularly during the bat active season (April to September).
- Security lighting should be avoided or be on a motion sensor and short duration timer (1 minute).

- Lighting that is required for security or safety reasons, should use a lamp of no greater than 2000 lumens (150 Watts) and should comprise sensor activated lamps.
- LED luminaires with a warm white spectrum (<2700 Kelvin) are the preferred option and should be used where possible. Luminaires should feature peak wavelengths higher than 550 nm to minimise disturbance to bats. All luminaires should lack UV elements, metal halide and fluorescent sources should not be used.
- Lighting should be directed to where it is needed with minimal light spillage. This can be achieved by limiting the height of the lighting columns and by using as steep a downward angle as possible and/or a specialist bollard that directs the light below the horizontal plane.
- Artificial lighting should not directly illuminate any potential bat roosting features or habitats of value to foraging bats, i.e., woodland, and trees.

The tree identified to have low potential to support roosting bats (target note 2, Figure 1) should be retained and protected.

8. Recommendations for Further Ecological Surveys

8.1 Reptiles

The woodland and scrub habitats could support common species of reptile. Further survey for reptiles is recommended to determine whether the development will impact on reptiles. It is recommended that a reptile presence/absence survey is undertaken, in accordance with best practice guidelines (Froglife, 1999), using artificial refugia such as roofing felt or corrugated tin. The survey should comprise a minimum of seven visits during optimal weather conditions, during April to June or September. It is recommended that, where removal of log or brash piles may be required, that they are carefully cleared to allow reptiles to be safely relocated away from the construction areas or move away into surrounding habitats of their own accord.

8.2 Bats

Seven bat transects of the site should be undertaken, and the deployment of two static bat detectors on at least seven separate occasions for five consecutive nights. The bat activity surveys should focus on the woodland habitats, where bat activity is likely to be high. The bat activity surveys, and deployment of static bat detectors should be undertaken during April to October, with one visit per month.

8.3 Badgers

Further survey is recommended during February to April (the active badger season) to determine the level of use of the active badger setts, using hair and sand traps, to be checked every two to three days over a period of at least one month. A further search of the site for sett entrances and signs should be carried out, to ensure all setts and signs have been recorded.

8.4 Hazel Dormouse

The hazel dormouse survey should comprise the deployment of a minimum of 50 nest tubes (at 15 to 20 m intervals) in March, followed by a total of eight visits during April, May, June, July, August, September, October, and November. The nest tubes should be deployed in suitable habitat on site and checked by a licensed hazel dormouse surveyor/Accredited Agent.

9. Biodiversity Enhancements

Below are a set of measures, which should be implemented to enhance biodiversity on site. These suggestions take into account current planning policy and guidance, as detailed in Section 3.2 of this report. These measures are in addition to avoidance and mitigation measures, as detailed in Section 7.

- The enhancement of retained woodland on site by planting native trees, shrubs, and bulbs.
- The installation of log piles along site boundaries, to provide habitat for invertebrates and reptiles.
- Garden spaces should include a wildflower mix suitable for the geology of the site, is available from www.wildseed.co.uk.
- The installation of Schwegler 2F Boxes (or similar) on trees and buildings, would be beneficial to common and widespread bat species that are likely to be present on site (www.arkwildlife.co.uk).
- The installation of RSPB Robin and Wren Diamond Nest boxes and Apex Open-Front Nest boxes on buildings and trees would be beneficial to garden bird species. These nest boxes can be purchased from www.rspb.co.uk.
- The installation of 2GR Schwegler nest boxes on trees, would be beneficial to garden bird species and birds of conservation concern known to occur in the locality. These nest boxes can be purchased from www.nhbs.com.
- The installation of a Royal Hedgehog House, which can be purchased from www.arkwildlife.co.uk.
- The installation of a hibernacula for invertebrates, such as the Bug Box 2000, which can be purchased from www.arkwildlife.co.uk.

These recommendations, including measures to protect and enhance Priority Habitats on site, should be included in a Biodiversity Management and Maintenance Scheme.

A Biodiversity Net Gain Assessment should be carried out for the site.

10. References

- British Standards Institute (BSI) (2013). *BS42020 - Biodiversity Code of Practice for Planning and Development*. BSI, London.
- British Standards Institution (2012). *BS 5837:2012 Trees in relation to design, demolition, and construction - recommendations*. BSI Standards Ltd.
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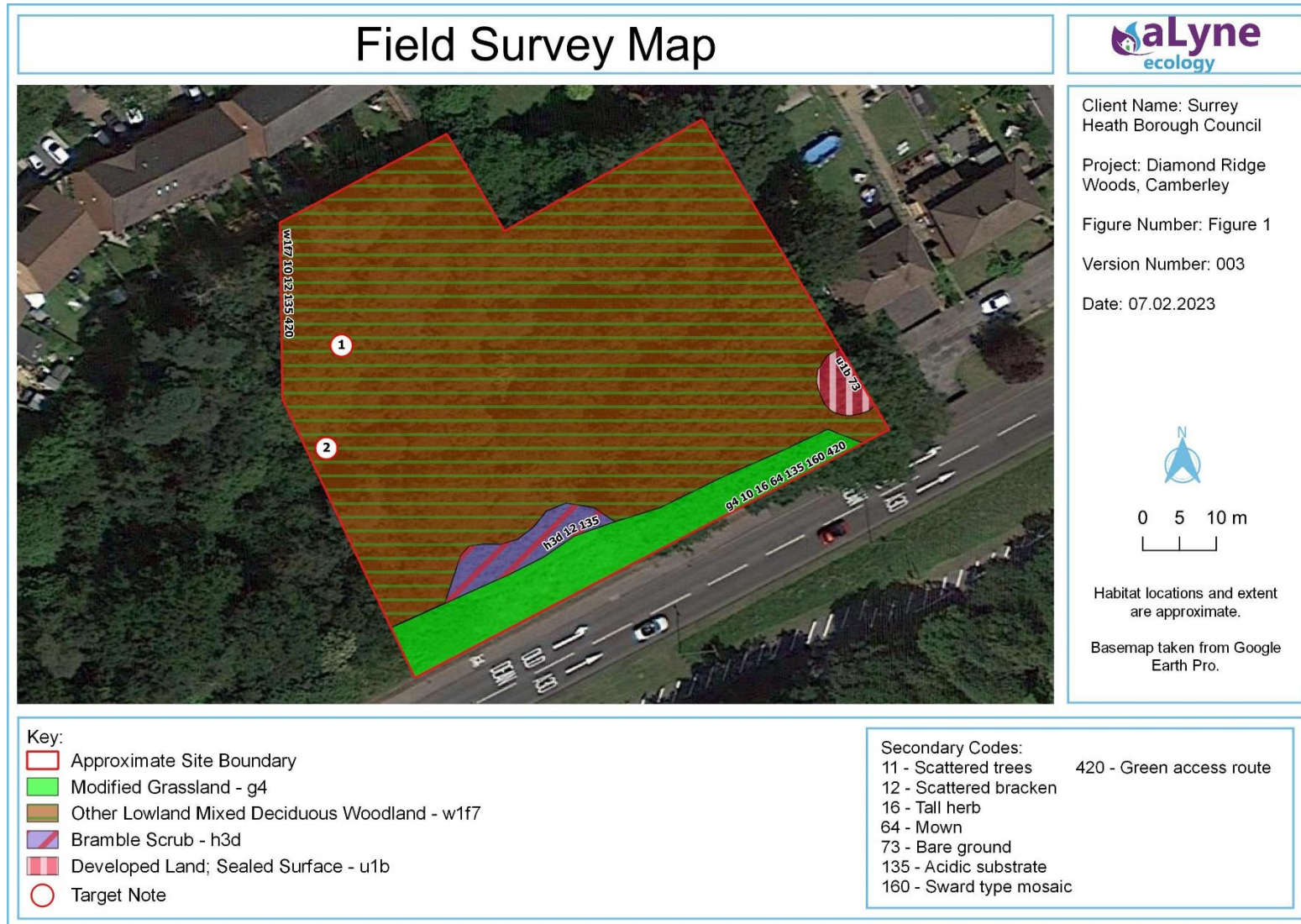
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11. Figure 1 – Results of Field Survey



12. Appendix 1 – Site Photographs



Photograph 1 — Eastern site boundary where it abuts Caesar's Close.



Photograph 2 — Area of gravel hard standing that is located adjacent to the eastern site boundary and Caesar's Close.



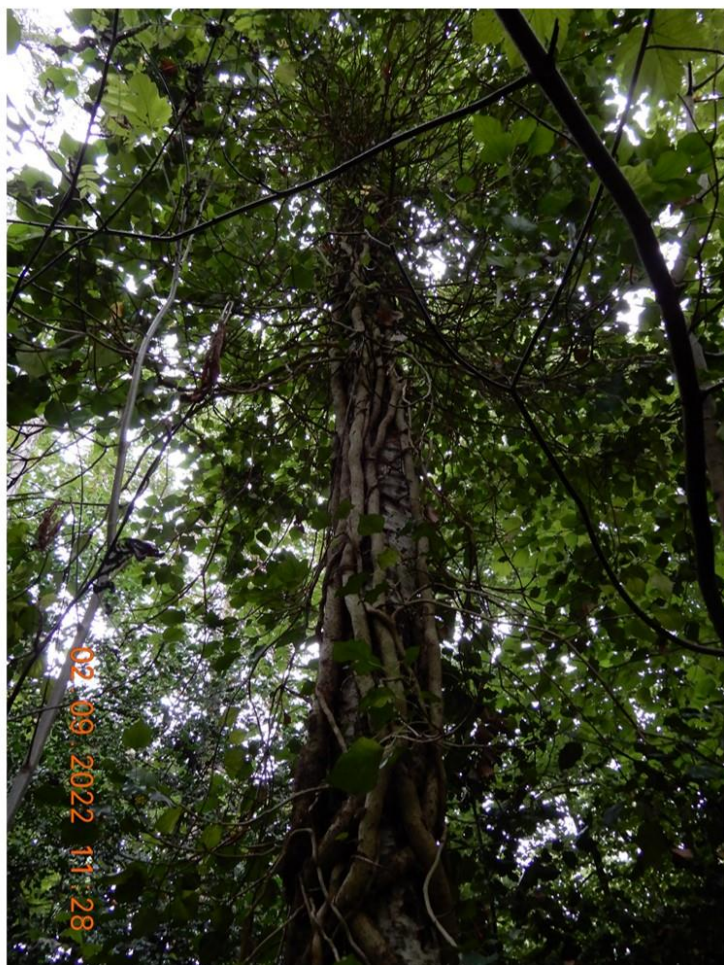
Photograph 3 — Centre of the woodland on site where a steep west-facing slope leads down to a previously excavated area.



Photograph 4 — Footpath that leads from northern site boundary to further areas of adjacent woodland to the west.



Photograph 5 — Southern woodland edge and area of dense bramble scrub located adjacent to the modified grassland footpath.



Photograph 6 — Ivy clad tree with low potential to support roosting bats (see target note 2 on Figure 1).

13. Appendix 2 – Full Species List and Target Notes

Habitats	Common Name	Species Name
Modified Grassland – g4	Bramble Broad-leaved dock Cock's-foot Common nettle Cow parsley False oat-grass Hedge bindweed Ragwort Ribwort plantain Wood avens	<i>Rubus fruticosus</i> agg. <i>Rumex obtusifolius</i> <i>Dactylis glomerata</i> <i>Urtica dioica</i> <i>Anthriscus sylvestris</i> <i>Arrhenatherum elatius</i> <i>Calystegia sepium</i> <i>Jacobaea vulgaris</i> <i>Plantago lanceolata</i> <i>Geum urbanum</i>
Other Lowland Mixed Deciduous Woodland – w1f7	Alder Ash Beech Bracken Bramble Buckthorn Cherry laurel Common nettle English bluebell English oak Hawthorn Hazel Holly Ivy Ivy-leaved cyclamen Pendulous sedge Red oak Rowan Scot's pine Silver birch Snowberry Sweet chestnut Sycamore Variegated yellow archangel Wild cherry Willow sp.	<i>Alnus glutinosa</i> <i>Fraxinus excelsior</i> <i>Fagus sylvatica</i> <i>Pteridium aquilinum</i> <i>Rubus fruticosus</i> agg. <i>Rhamnus</i> sp. <i>Prunus laurocerasus</i> <i>Urtica dioica</i> <i>Hyacinthoides non-scripta</i> <i>Quercus robur</i> <i>Crataegus monogyna</i> <i>Corylus avellana</i> <i>Ilex aquifolium</i> <i>Hedera helix</i> <i>Cyclamen hederifolium</i> <i>Carex pendula</i> <i>Quercus rubra</i> <i>Sorbus aucuparia</i> <i>Pinus sylvestris</i> <i>Betula pendula</i> <i>Symphoricarpos</i> sp. <i>Castanea sativa</i> <i>Acer pseudoplatanus</i> <i>Lamium galeobdolon</i> <i>Prunus avium</i> <i>Salix</i> sp.
Bramble Scrub – h3d	Bracken Bramble Common nettle	<i>Pteridium aquilinum</i> <i>Rubus fruticosus</i> agg. <i>Urtica dioica</i>
Birds	Blue tit Robin Woodpigeon	<i>Cyanistes caeruleus</i> <i>Erithacus rubecula</i> <i>Columba palumbus</i>

Target Note	Notes
1	Cotoneaster
2	Tree with low potential for roosting bats

14. Appendix 3 – Legislation and Planning Policy

14.1 Habitats Directive, EC Council Directive 92/43/EEC

The following information has been taken from ec.europa.eu.

Natura 2000 is a network of sites selected to ensure the long-term survival of Europe's most valuable and threatened species and habitats. How a site is chosen depends on what it aims to protect.

Under the Habitats Directive (Art. 3 and 4), Member States designate Special Areas of Conservation (SACs) to ensure the favourable conservation status of each habitat type and species throughout their range in the EU. Under the Birds Directive (Art. 4), the network must include Special Protection Areas (SPAs) designated for 194 particularly threatened species and all migratory bird species.

Member States designate Special Protection Areas (SPAs) according to scientific criteria such as '1% of the population of listed vulnerable species' or 'wetlands of international importance for migratory waterfowl'.

The choice of sites is based on scientific criteria specified in the directive, to ensure that the natural habitat types listed in the directive's Annex I and the habitats of the species listed in its Annex II are maintained or, where appropriate, restored to a favourable conservation status in their natural range.

14.2 The Birds Directive 2009/147/EC

The following information has been taken from ec.europa.eu.

The Birds Directive aims to protect all of the 500 wild bird species naturally occurring in the European Union. The 500 wild bird species naturally occurring in the European Union are protected in various ways:

- **Annex 1:** 194 species and sub-species are particularly threatened. Member States must designate Special Protection Areas (SPAs) for their survival and all migratory bird species.
- **Annex 2:** 82 bird species can be hunted. However, the hunting periods are limited, and hunting is forbidden when birds are at their most vulnerable: during their return migration to nesting areas, reproduction, and the raising of their chicks.
- **Annex 3:** overall, activities that directly threaten birds, such as their deliberate killing, capture or trade, or the destruction of their nests, are banned. With certain restrictions, Member States can allow some of these activities for 26 species listed here.
- **Annex 4:** the directive provides for the sustainable management of hunting, but Member States must outlaw all forms of non-selective and large scale killing of birds, especially the methods listed in this annex.
- **Annex 5:** the directive promotes research to underpin the protection, management, and use of all species of birds covered by the Directive, which are listed in this annex.

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

Under these Regulations, the UK Government and Devolved Administrations are required to establish a network of important high-quality conservation sites that will make a significant contribution to conserving the habitats and species identified in Annexes I and II, respectively, of European Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora, known as the Habitats Directive. The listed habitat types and species are those considered to be most in need of conservation at a European level (excluding birds). Of the Annex I habitat types, 78 are believed to

occur in the UK. Of the Annex II species, 43 are native to, and normally resident in, the UK (www.jncc.gov.uk). Special Areas of Conservation (SACs), together with Special Protection Areas (SPAs), are the UK's contribution to the Bern Convention's Emerald Network of protected areas, known as Areas of Special Conservation Interest (ASCIs).

14.4 The 1949 National Parks and Access to the Countryside Act

Section 21 of the National Parks and Access to the Countryside Act, 1949 provides discretionary powers to enable local authorities to establish and manage Local Nature Reserves (LNRs). Under the Conservation of Habitats and Species (Amendment) (EU Exit) 2019 Regulations, these powers have been extended from preserving flora and fauna to include enabling or facilitating its recovery or increase.

14.5 The Wildlife and Countryside Act, 1981 (As Amended)

The following information was taken from www.jncc.gov.uk and www.ukwildlife.com.

The Wildlife and Countryside Act, 1981 (as amended) is the primary national legislation, which protected animals, plants, and habitats in the UK. The act contains four parts and 17 schedules, which cover:

- Part 1: Wildlife (includes protection of birds, animals, and plants; and measures to prevent the establishment of non-native species which may be detrimental to native wildlife).
- Part 2: Nature conservation, the countryside, and National Parks (including the designation of protected areas).
- Part 3: Public rights of way.
- Part 4: Miscellaneous provisions of the act.

All naturally occurring wild birds in Great Britain are protected from persecution. It is illegal to kill, injure or 'take' any wild bird, take, or damage the nest of any wild bird whilst in use or being built. The eggs of all wild birds are also protected. If you have in your possession any live wild birds, egg(s), or any part of a wild bird you are committing an offence. The birds listed in Schedule 1 of the Wildlife and Countryside Act 1981 are further protected by Special Penalties all year round for those in Part 1 and during a specified closed season for those listed in Part 2.

Schedule 5 lists Animals Species that are protected under Section 9. Section 9 prohibits the intentional killing, injuring, or taking of the species listed in Schedule 5 and also prohibits their possession and the trade in the wild animals listed. The species listed are also further protected from disturbance by prohibiting actions that affect places they use for shelter.

Animals listed in Schedule 6 are protected from being killed or taken by certain methods under Section 11(1) of the Wildlife and Countryside Act 1981. The methods listed are self-locking snares, bows, crossbows, explosives (other than ammunition for a firearm), or live decoys. The species listed are also protected from the following activities: trap, snare or net, electrical device for killing or stunning, poisonous, poisoned, or stupefying substances or any other gas or smoke, automatic or semi-automatic weapon, device for illuminating a target or sighting device for night shooting, artificial light, mirror or other dazzling device, sound recording, and mechanically propelled vehicle in immediate pursuit.

Under the Wildlife and Countryside Act 1981 (as amended), the country nature conservation bodies have a duty to notify any area of land which in their opinion is 'of special interest by reason of any of its flora, fauna, or geological or physiographical features' – these areas are known as Sites of Special Scientific Interest (SSSIs).

14.6 Countryside & Rights of Way Act, 2000

The CRoW Act gives a public right of access to land mapped as 'open country' (mountain, moor, heath and down) or registered common land. The protection of Sites of Special Scientific Interest (SSSIs) is strengthened in this legislation. The CRoW Act also allows for the prosecution of third parties that damage or destroy a SSSI.

14.7 Hedgerow Regulations 1997

These regulations fall under the local authority and are intended to protect important hedgerows from removal. Owners and managers must request permission from their local authority before removing a hedgerow, and permission may not be granted if it supports a diverse range or protected species.

14.8 The Protection of Badgers Act, 1992

Badgers are fully protected in the UK by the Protection of Badgers Act, 1992 and by Schedule 6 of the Wildlife and Countryside Act, 1981 (as amended). This makes it an offence (amongst other things) to:

- Wilfully kill, injure, take, possess, or cruelly treat a badger.
- Intentionally or recklessly damage, destroy or obstruct access to a badger sett.
- Disturb a badger while it is occupying a sett.

14.9 Natural Environment and Rural Communities (NERC) Act, 2006

The site comprises deciduous woodland, which is a Priority Habitat. Priority Habitats are listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act, 2006. Section 40 (1) of the NERC Act, 2006 imposes a duty to conserve biodiversity:

- *“Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.”*

Section 40(3) of the Act explains that:

- *“Conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat”.*

The duty applies to all local authorities and extends beyond just conserving what is already there to carrying out, supporting, and requiring actions that may also restore or enhance biodiversity.

14.10 National Planning Policy Framework (NPPF) 2021

The National Planning Policy Framework sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for housing and other development can be produced. So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development.

Section 15 of the NPPF (paragraphs 174 to 182) considers the conservation and enhancement of the natural environment including habitats and biodiversity (paragraphs 179-182) Paragraph 174 states that planning 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; and
- Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures”

Paragraph 175 states that plans should distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.

Paragraph 179 states that in order to protect and enhance biodiversity and geodiversity, 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 biodiversity; 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.”

When determining planning applications, Paragraph 1780 states that local planning authorities should aim to conserve and enhance biodiversity by applying 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.”

As stated in paragraph 181 the following 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 182 states that the presumption in favour of sustainable development does not apply where the planned project is likely to have a significant effect on a habitat site (alone or in combination with other plans or projects) unless an appropriate assessment has concluded the plan or project will not adversely affect the integrity of the habitats site.

14.11 Office of the Deputy Prime Minister (ODPM) Circular 06/2005

ODPM Circular 06/05 provides guidance on applying legislation in relation to nature conservation and planning in England. Part I considers the legal protection and conservation of internationally designated sites (namely candidate Special Areas of Conservation (cSACs), SACs, potential Special Protection Areas (pSPAs), SPAs and Ramsar sites) and Part II considers the legal protection and conservation of nationally designated sites, namely Sites of Special Scientific Interest (SSSIs).

Part III considers the protection of habitats and species outside of designated areas (particularly UK Biodiversity Action Plan species and habitats, which it states are capable of being a material consideration in the preparation of local development documents and the making of planning decisions.

Part IV considers species protected by law and states that the presence of a protected species is a material consideration in the consideration of a development proposal that, if carried out, would be likely to result in harm to the species or its habitat and 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.

14.12 Water Framework Directive

The Water Framework Directive (Directive 2000/60/EC) became law in England and Wales in 2003 via the Water Environment (WFD) (England and Wales) Regulations. The Water Framework Directive has four main goals: (1) to prevent deterioration in water status, (2) all water bodies achieve good ecological status, good chemical status, and good groundwater status (or potential), (3) reduce and eliminate sources of pollution and (4) contribute to achieving objectives of sites protected by other EU legislation.

14.13 Bern Convention

The Convention on the Conservation of European Wildlife and Natural Habitats (the Bern Convention) was ratified by the UK Government in 1982. The principal aims of the Convention are to ensure conservation and protection of wild plant and animal species and their natural habitats (listed in Appendices I and II of the Convention), to increase cooperation between contracting parties, and to regulate the exploitation of those species (including migratory species) listed in Appendix III. To this end, the Convention imposes legal obligations on contracting parties, protecting over 500 wild plant species and more than 1,000 wild animal species.

14.14 Wild Mammals (Protection) Act, 1996

The Wild Mammals (Protection) Act 1996, makes provision for the protection of wild mammals from certain cruel acts by stating that any person who mutilates, kicks, beats, nails or otherwise impales, stabs, burns, stones, crushes, drowns, drags or asphyxiates any wild mammal with intent to inflict unnecessary suffering shall be guilty of an offence.

15. Appendix 4 – List of Abbreviations

BAP	Biodiversity Action Plan
CSZ	Core Sustenance Zone
CWS	County Wildlife Site
EcIA	Ecological Impact Assessment
EPSL	European Protected Species Licence
GCN	Great Crested Newt
NERC	Natural Environment and Rural Communities Act
NPPF	National Planning Policy Framework
PEA	Preliminary Ecological Appraisal
SSSI	Site of Special Scientific Interest
SAC	Special Area of Conservation
SINC	Site of Importance for Nature Conservation
SNCI	Site of Nature Conservation Importance
SPA	Special Protection Area
UKHab	UK Habitat Classification System