

Appendix G – Ecological Assessment



Sperberry Hill Solar and BESS Project, Resubmission
on behalf of Axis
Ecological Assessment Report



Report Verification and Declaration of Compliance

This report has been prepared with reference to best practice guidelines for Ecological Impact Assessment in the UK and Ireland, as defined by CIEEM (2022) and is provided in accordance with the provisions of British Standard 42020:2013 Biodiversity: Code of practice for planning and development and BS 8683:2021 Process for Designing and Implementing Biodiversity Net Gain - Specification.

Document Control				
Project Name:		Sperberry Hill Solar and BESS Project, Resubmission		
Project Number:		AxisL-043-1518		
Report Title		Ecological Assessment Report		
Issue	Date	Notes	Prepared	Reviewed
V1	10/09/2024	Draft for client comment	J. Stevens BSc (Hons.) Principal Ecologist	A Logan MSc MCIEEM Principal Ecologist
V2	23/09/2024	Draft for client comment	J. Stevens BSc (Hons.) Principal Ecologist	A Logan MSc MCIEEM Principal Ecologist
F1	22/10/2024	Final Issue	J. Stevens BSc (Hons.) Principal Ecologist	A Logan MSc MCIEEM Principal Ecologist

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CONTENTS

1.	INTRODUCTION	5
1.1	Background and Scope.....	5
1.2	Site Overview.....	5
1.3	Proposed Development	6
1.4	Legislative and Planning Framework.....	6
2	METHODOLOGY	8
2.1	Desk Study	8
2.2	Extended Habitat Survey.....	9
2.3	Breeding Bird Surveys	9
2.4	Limitations of Surveys.....	9
2.5	Biodiversity Net Gain	10
3	BASELINE	12
3.1	Designated Sites for Nature Conservation	12
3.2	Priority habitats	14
3.3	Ancient and Irreplaceable Habitats	14
3.4	Habitats and Vegetation	14
3.5	Protected and Notable Species	15
3.6	Invasive Non-native Species.....	18
4	ASSESSMENT	19
4.1	Overview.....	19
4.2	Designated Sites	19
4.3	Priority and Irreplaceable Habitats	20
4.4	Habitats	20
4.5	Biodiversity Net Gain Assessment.....	20
4.6	Protected and Notable Species	21
4.7	Invasive Non-native species	25
5	MITIGATION AND ENHANCEMENT SUMMARY.....	26

TABLES

Table 1:1: Key legislation	6
Table 1:2: Key Policy	7
Table 3:1 Non-statutory Designated Sites	12
Table 3:2: Priority Habitats	14
Table 3:3: UKhab habitats summary	15
Table 3:4: Breeding bird species recorded on Site	15
Table 5:1: Mitigation and Enhancement Summary	26

FIGURES

- Figure 1: Site Location Plan
- Figure 2: Statutory Designated Sites Plan
- Figure 3: Non-statutory Designated Sites
- Figure 4: UKHabitat Survey Plan
- Figure 5: Pond Location Plan

APPENDICES

- Appendix 1: Breeding Bird Survey Report
- Appendix 2: Photographs

1. INTRODUCTION

1.1 Background and Scope

- 1.1.1 Avian Ecology Ltd. (AEL) was commissioned by Axis on behalf of Brockwell Storage and Solar Limited to undertake an Ecological Assessment in relation to a proposed solar development (the 'Proposed Development') on land off Sperberry Hill, near St Ippolyts, Hertfordshire. The Proposed Development is a resubmission (hereafter the 'Resubmission Scheme') of a previously refused solar development (planning ref: 22/00709/FP, hereafter the '2023 Scheme'). The study area comprised the planning application site boundary ('the Site') as shown in **Figure 1**, unless otherwise stated.
- 1.1.2 This report provides baseline information and an assessment of potential ecological effects of the Proposed Development.
- 1.1.3 The objectives of the assessment are to:
- Provide baseline information on the current habitats and ecological features both within the Site and in the immediately surrounding area;
 - Identify the proximity of any designated sites for nature conservation interest and provide an assessment of any potential effects the Proposed Development may have on these;
 - Identify the presence or potential presence of any protected species or habitats and provide an assessment of any potential effects the Proposed Development may have on these; and,
 - Provide recommendations for further pre-construction checks and / or mitigation measures, if required as well as providing an outline of proposed habitat enhancements.
- 1.1.4 The assessment has been informed by desk-based review of relevant ecological information, extended habitat survey, badger survey and refers to relevant legislation, planning policy and guidance as appropriate.
- 1.1.5 Consideration has been given to the potential presence of rare, protected, or notable habitats and species, and the location of nearby features including designated sites for nature conservation. Mitigation and enhancement measures to achieve Biodiversity Net Gain (BNG) are also proposed.
- 1.1.6 Throughout this report, common names for species are favoured over scientific names unless there is potential for confusion and in which case scientific names are also presented.

1.2 Site Overview

- 1.2.1 The Site, as shown on **Figure 1**, comprises two discrete areas separated by Little Almshoe Lane and totals approximately 35 ha. The Site is located south east of the village of St Ippolyts, Hitchin, Hertfordshire and west of Stevenage. The Site is located at the approximate site central grid reference TL2059 2645.
- 1.2.2 Both areas are predominantly arable land, being used for a wheat crop at the time of baseline survey and bounded by hedgerows.
- 1.2.3 The surrounding land use is predominantly agricultural, including pasture and arable fields with a number of small villages, including St Ippolyts and Titmore Green, also present. Wymondley Transformer Station is located north of the Site with St Ibbs Park area of parkland to the northwest.

- 1.2.4 The grid connection route is not included in the assessment as it will follow existing highways with works confined to habitats with negligible ecological value.
- 1.2.5 The Site location is illustrated in **Figure 1**.

1.3 Proposed Development

- 1.3.1 The proposals include the construction of a solar farm, battery storage facility together with all associated works, equipment and ancillary infrastructure.

1.4 Legislative and Planning Framework

Legislation

- 1.4.1 Reference has been made to the following key pieces of legislation listed in **Table 1:1**.

Table 1:1: Key legislation

International
• Convention on Wetlands of International Importance especially as Waterfowl Habitat 1971 (hereafter referred to as the 'the Ramsar Convention'); • Convention on the Conservation of European Wildlife and Natural Habitats 1979 (hereafter referred to as the 'the Bern Convention'; and, • UNESCO convention on the protection of the World Cultural and Natural Heritage (1972).
National
• Countryside and Rights of Way Act 2000; • Hedgerow Regulations 1997; • Infrastructure Act 2015; • Natural Environment and Rural Communities (NERC) Act (2006); • Protection of Badgers Act 1992; • The 'Conservation of Habitats and Species Regulations 2017 (as amended); • The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019; • The Environment Act 2021; • The Invasive Alien Species (Enforcement and Permitting) Order 2019; • The Town and Country Planning Act 1990; and, • The Wildlife and Countryside Act 1981 (as amended).

- 1.4.2 The Conservation of Habitats and Species Regulations 2017 (as amended) remains in place following the United Kingdom's (UK's) withdrawal from the European Union (EU) with only relatively minor changes coming into force on 31st December 2020, with the 2017 regulations being transposed into national (England and Wales) legislation via the Conservation of Habitats and Species Amendment (EU Exit) Regulations 2019. They are hereafter referred to as the 'Habitats Regulations'.

Policy

1.4.3 Reference has been made to the following key pieces of policy listed in **Table 1:2**.

Table 1:2: Key Policy

National
• Ancient woodland, ancient trees and veteran trees: advice for making planning decisions (Natural England. 2022); • Biodiversity Net Gain. Good practice principles for development; • BS 42020:2013 Biodiversity – Code of Practice for Planning and Development; • BS 8683:2021 Process for Designing and Implementing Biodiversity Net Gain – Specification; • European protected species policies for mitigation licences (Natural England. 2022); • National Planning Policy Framework 2 (NPPF, 2023); • The United Kingdom Biodiversity Action Plan (UK BAP); and, • Wildlife licensing: comment on new policies for European protected species licence (Natural England, 2016).
Local
• North Hertfordshire Local Plan 2011-2031 • A biodiversity Action Plan for Hertfordshire

1.4.4 The 'UK Post-2010 Biodiversity Framework' succeeds the UK Biodiversity Action Plan (UK BAP) and 'Conserving Biodiversity – the UK Approach'. The lists of priority species and habitats agreed under UK BAP still form the basis of much biodiversity work and are therefore considered within this report in the context of the objectives of the Biodiversity Framework. BAPs identify habitats and species of nature conservation priority on a UK (UK BAP) and Local (LBAP) scale. UK BAPs formed the basis for statutory lists of priority species and habitats in England under Section 41 (England) of the Natural Environment and Rural Communities (NERC) Act 2006, and so are also relevant in the context of this legislation.

2 METHODOLOGY

2.1 Desk Study

- 2.1.1 A desktop study was undertaken to identify any known existing features or species of ecological importance within the study area (as defined below).
- 2.1.2 The desk study included a review of relevant policy and guidance and sought to identify any statutory designated sites for nature conservation through a review of the Natural England Designated Sites View¹, Joint Nature Conservation Committee (JNCC)² and Multi Agency Geographic Information for the Countryside (MAGIC)³ websites. A 2km search radius surrounding the Site boundary was adopted for all statutory national designated sites, extending to 10km for international statutory designated sites.
- 2.1.3 The search for statutory designated sites included the following:
- Internationally Designated Sites:
 - Special Protection Areas (SPA) and potential SPA;
 - Ramsar Wetlands of International Importance (Ramsar) and proposed Ramsar; and,
 - Special Protection Areas (SAC) and possible SAC.
 - Nationally designated Sites:
 - Sites of Special Scientific Interest (SSSI);
 - National Nature Reserve (NNR); and,
 - Local Nature Reserve (LNR).
- 2.1.4 The MAGIC website also includes details of granted EPS licence applications. A 2km search radius around Site boundary was adopted for EPS licences.
- 2.1.5 Biological records data on non-statutory designated sites and records of protected and notable species within 2km of the Site was requested from Hertfordshire Ecological Records Centre (HERC). For the purposes of this assessment a recent record is any that occurred within the last 10 years.
- 2.1.6 The Ancient Woodland Inventory was accessed through MAGIC to determine the presence and location of ancient woodland blocks recorded on the inventory and the Woodland Trust Ancient Tree Inventory⁴ was consulted for locations of individual ancient or veteran trees.
- 2.1.7 Reference was also made to Ordnance Survey (OS) maps of the wider area and online aerial images (www.google.co.uk/maps) in order to determine any features of nature conservation interest in the wider area.

¹ <https://designatedsites.naturalengland.org.uk/> (Accessed 25/11/21).

² <http://jncc.defra.gov.uk/> (Accessed 25/11/21).

³ <https://magic.defra.gov.uk/MagicMap.aspx> (Accessed 25/11/21).

⁴ <https://ati.woodlandtrust.org.uk/>

2.2 Extended Habitat Survey

- 2.2.1 An UK habitat survey of the Site was undertaken on the 5th and 6th of August 2024 by A. Crone BA (hons), an experienced ecologist. The survey followed UK Habitat Survey Methodology⁵ and with reference to the Chartered Institute of Ecology and Environmental Management (CIEEM), Technical Guidance Series *Guidelines for Preliminary Ecological Appraisal* (CIEEM, 2017)⁶.
- 2.2.2 The survey updated a previous survey undertaken on 11th August 2021 by A. Hulme BSc (Hons), an experienced ecologist using the Phase 1 Habitat Methodology (JNCC, 2010)⁷
- 2.2.3 The survey covered land within the redline boundary (excluding grid connection) and additional notes were made for any habitats of interest immediately adjacent to the Site. The extent of the Site is detailed in **Figure 1**, habitats located within the Site are shown in **Figure 4**.
- 2.2.4 Habitats were mapped and any features of particular interest described using a series of 'target notes' (TNs). The survey was extended to include the additional recording of specific features indicating the presence, or likely presence, of protected species, invasive species and other species of conservation significance.

2.3 Breeding Bird Surveys

- 2.3.1 The Breeding Bird Survey was undertaken between May and June 2022 by J. Hanlon who is an experienced ornithologist. The survey area comprised the Site, extended to 100m for bird species listed on Schedule 1 of the Wildlife and Countryside Act (1981) as amended.
- 2.3.2 The methodology employed was based-upon a scaled-down version of the British Trust for Ornithology (BTO) Common Bird Census (CBC) technique, as detailed in Gilbert *et al.* (1998)⁸.
- 2.3.3 Full methodologies are provided within the Breeding Bird Survey Report (**Appendix 1**).

2.4 Limitations of Surveys

Desk study

- 2.4.1 While desk study records provide useful context to a site, and may indicate presence of a particular species, the absence of particular species from the results does not necessarily mean it is not found within the search area or the site.
- 2.4.2 Desks study records are often provided with a low degree of accuracy (sometimes up to 10km resolution) and are assigned to a grid square only. In these cases it is therefore not possible to determine where in relation to the Site these records are located. Where no accompanying information has been provided allowing for a more accurate location to be determined only records

⁵ <https://data.jncc.gov.uk/data/9578d07b-e018-4c66-9c1b-47110f14df2a/Handbook-Phase1-HabitatSurvey-Revised-2016.pdf> (Accessed 04/09/2024).

⁶ <https://cieem.net/resource/guidance-on-preliminary-ecological-appraisal-gpea/> (Accessed 04/09/24).

⁷ <https://data.jncc.gov.uk/data/9578d07b-e018-4c66-9c1b-47110f14df2a/Handbook-Phase1-HabitatSurvey-Revised-2016.pdf> (Accessed 04/09/2024).

with at least 6 figure accuracy (100m grid square) have been used when determining the distance of records from the Site, however records with lower accuracies are included in the total records count.

- 2.4.3 Habitats within MAGIC, including those within Priority Habitat Inventory (PHI) and ancient woodland, are often erroneous, low in confidence and assigned from a desk-based assessment only. Therefore, it does not represent a comprehensive record of these habitats within the study area and areas of habitat not listed within the inventory may be present. Similarly, areas of habitats listed within the inventory may not meet the relevant descriptors for the particular priority habitat type.

Extended Habitat Survey

- 2.4.4 An extended habitat survey does not constitute a detailed botanical survey or faunal species list or provide a full protected species survey but, enables competent ecologists to ascertain an understanding of the ecology of the Site in order to:
- Broadly identify the nature conservation value of a site and assess the significance of any potential impacts on habitat/species recorded; and/or,
 - Confirm the need and extent of any additional specific ecological surveys that are required to identify the true nature conservation value of a site (if any).

- 2.4.5 The extended habitat survey visit was undertaken in August 2024 (with the earlier Phase 1 habitat survey also undertaken in August 2022), and therefore within the optimal period for botanical surveys (approximately April to September).

Breeding Bird Surveys

- 2.4.6 It is acknowledged that breeding bird surveys undertaken in 2022 are now approximately 2 years old. Given the baseline habitats have remained comparable between surveys in support of the 2023 Scheme and the Resubmission Scheme, it is considered unlikely that substantive changes have occurred to the breeding bird assemblage within the Site, beyond natural annual variations.

2.5 Biodiversity Net Gain

- 2.5.1 In order to assess the measurable biodiversity impacts associated with the Proposed Development, the Defra Statutory Biodiversity Metric Calculator⁹ (the 'Metric') was utilised in order to provide evidence of the required biodiversity net-gain. The Metric is a biodiversity accounting tool used to quantify biodiversity losses and gains using habitats as a proxy for overall biodiversity. It is recognised as an industry standard and has been developed through full and widespread consultation with stakeholders across all relevant sectors.
- 2.5.2 The BNG assessment was undertaken by J. Stevens *BSc (Hons)* and A Logan *MSc MCIEEM*, suitably qualified and experienced ecologists with experience utilising biodiversity metrics. Data gathering and Metric calculations were undertaken according to the methodology detailed with the Metric user guide, unless otherwise stated.
- 2.5.3 The metric calculates the value of a habitat (measured as 'biodiversity units') by multiplying the area (hectares), distinctiveness (intrinsic value and rarity)), condition (quality) and strategic significance

⁹ <http://publications.naturalengland.org.uk/publication/6049804846366720>

(ecological value of the location) of each habitat parcel. The distinctiveness of a habitat is pre-set within the Metric and cannot be changed.

- 2.5.4 Information on habitat condition was gathered during the extended habitat survey, assessing habitats against the relevant criteria for each habitat type as set out in the Metric Condition Assessment Technical Supplement.
- 2.5.5 For created habitats additional risk multipliers are assigned to account for the difficulty of creating a particular habitat type, time required to achieve the target condition, and where habitat creation is off site, spatial risk.
- 2.5.6 Where the value of habitats following works is greater than those at the baseline, a net gain will be predicted, or a net loss predicted where the post-works habitat value is lower than the baseline. In addition, the Metric promotes a 'no down-trading' policy within the Metric, whereby habitat loss must be compensated by habitat of the same value or higher; loss of high distinctiveness habitats such as lowland meadow and broad-leaved woodland must be compensated for on a like-for-like basis.

3 BASELINE

3.1 Designated Sites for Nature Conservation

Statutory Designated Sites

- 3.1.1 A review of MAGIC confirmed that the Site does not lie within any statutory designated sites and only one statutory designated site is located within 2km of the Site, this being Wain Wood Site of Special Scientific Interest (SSSI). Wain wood is designated as an example of oak / hornbeam woodland nearing the northern limit of its natural range and a habitat reduced in extent nationally. Wain Wood SSSI also supports areas of unimproved acid grassland and calcareous grassland, as well as an interesting butterfly community including purple hairstreak.
- 3.1.2 The location of Wain Wood SSSI in relation to the Site is shown on **Figure 2**.

Non-Statutory Designated Sites

- 3.1.3 A review of data provided by HERC shows the Site does not lie within any non-statutory designated site for nature conservation. The search identified 15 non-statutory designated sites, all Local Wildlife Sites (LWS), within 2km of the Site. Almshoe Bury Swallowhole is also designated as a Regionally Important Geological Site (RIGS). The LWS's located within 100m are Wymondley Transforming Station LWS (located approximately 10m north of the Site and separated by Sperberry Hill local road) and Sperberry Hill House Meadow LWS (located approximately 30m west of the Site, separated by Tittendell Lane).
- 3.1.4 Non-statutory designated sites for nature conservation are described in **Table 3:1** and locations are presented in **Figure 3**.

Table 3:1 Non-statutory Designated Sites

(LWS: Local Wildlife Site; RIGS: Regionally Important Geological Site)

Site Name	Distance and Direction from Site	Description
Wymondley Transforming Station LWS	10m north	Old gravel pit landscaped to form grounds of transforming station. Poor stony substrate on chalk, with very few grasses recorded. Raised banks support coarse calcareous grassland with scrub invading slowly from the edges.
Sperberry Hill House Meadow LWS	30m west	Meadow of unimproved neutral-calcareous grassland to the east of Ippollitts Brook. There are old hedges and scattered trees.
St Ibbs Bush LWS	360m west	Building and environs important for protected species.
Foy Alder Swamp LWS	480 north west	An old semi-natural alder woodland with neutral / acid fen and marshy grassland remnants bordering Ippollitts Brook. A system of spring seepages is present plus an old pollarded hornbeam hedge borders the eastern side. The site supports a rich higher plant flora.
Lucas Wood LWS	680m east	Ancient semi-natural woodland of oak / hornbeam coppice. Damper in the north where there is an excavated pond and wet ride. The woodland supports a moderately diverse flora.
Vicar's Grove LWS	780m west	Infilled gravel pit, originally excavated on the site of an ancient oak / hornbeam coppice woodland. A small remnant of the wood remains around the site boundary. Locally important flower-rich banks occur along the south-

Site Name	Distance and Direction from Site	Description
		west margin of the site plus areas of secondary scrub and ruderals are present.
Almshoe Bury Swallowhole LWS & RIGS	940m south	Swallowhole formed in small narrow valley in glacial outwash gravels, which when groundwater is high forms a small deep lake within the site. The topography influences the plant communities with a flat valley floor supporting unimproved neutral grassland. At the southern end of the site is an area of mixed scrub and woodland with old coppiced oak and hornbeam with several ancient woodland indicators recorded.
Fishers Green Wood LWS	1 km east	Thin strip of ancient semi-natural woodland with typical ancient woodland flora.
Margaret's Wood & Spoil Bank Wood, Todds Green LWS	1.16 km east	Ancient semi-natural broadleaved woodland bisected by a railway, which supports a reasonably diverse flora.
Rush Green Airfield LWS	1.28 km south	Airfield supporting predominantly moderately species-rich neutral grassland. The sward is dominated by grasses with sparse herbs. Along the eastern side there is a narrow strip of damp grassland with a good species diversity including many grasses, sedges, rushes and herbs. To the south-east corner are two small areas, also supporting damp grassland, with a pond and drainage ditch which have a rich wetland vegetation. Another small fenced off area of grassland to the south-west has a semi-improved character with several grassland indicators present. The site includes areas of broadleaved plantation and a winterbourne along much of the eastern boundary adds further habitat diversity.
Symonds Green LWS	1.31 km south east	An old village green now enclosed by housing development and crossed by a small road and footpath. The green consists of an area of semi-improved, rough and somewhat tussocky, neutral to acidic grassland with a wet ditch and small pond.
Purwell Railway LWS	1.65 km north	Railway embankment supporting species-rich neutral/calcareous grassland and scrub on the south-west facing side. A variety of grasses and herbs have been recorded. A diversity of butterfly species has also been recorded.
Maydencroft Manor Farm, Gosmore LWS	1.8 km north west	Building and environs important for protected species.
Whitney Wood LWS	1.87 km east	Ancient semi-natural woodland surrounded by urban development. The ground flora is sparse in the centre of the wood, but supports a moderate diversity of woodland indicators. Two large ponds add habitat diversity to the wood. A small southerly extension is linked to the main wood by a wide road verge of retained coppice.
The Warren & Wood E. of Wain Wood LWS	1.98 km south west	This site has been left as a result of removing Wildlife Sites from within the adjacent SSSI.

3.2 Priority habitats

- 3.2.1 Information on priority habitats within the Site and within 500m of the Site is presented in **Table 3:2** below. Where numerous records of a particular habitat were recorded, only the closest record to the Site has been provided.

Table 3:2: Priority Habitats

(NERC S.41; Section 41 Natural Environment and Rural Communities (NERC) Act (2006); UKBAP: UK Biodiversity Action Plan; LBAP: Local (Hertfordshire) Biodiversity Action Plan)

Priority habitat name	Designation	Distance from site
Hedgerows	NERC S.41, UKBAP, LBAP	Within the Site
Deciduous woodland	NERC S.41, UKBAP, LBAP	North of the Site
Traditional orchards	NERC S.41, UKBAP, LBAP	75m north

3.3 Ancient and Irreplaceable Habitats

- 3.3.1 No ancient woodland as shown on the Ancient Woodland Inventory is present within 500m of the Site.
- 3.3.2 Data provided by HERC shows five records of ancient or mature trees within 500m of the Site, the closest of which are located approximately 270m northwest of the Site within St Ibbs Park.
- 3.3.3 No areas of woodland with ancient woodland indicators, or trees showing ancient or veteran features were observed within the Site during the extended habitat survey.

3.4 Habitats and Vegetation

- 3.4.1 This section should be read in conjunction with the UKHab Habitat Plan presented as **Figure 4**.
- 3.4.2 The Site baseline conditions remain fundamentally unchanged from those submitted in support of the 2023 Scheme, with the Site broadly comprising three arable fields. Field boundaries typically consist fragmented hedgerows, of which some lengths are intact, and others defunct. Hedgerows are generally species rich, however species poor examples are present. Two of fields were separated by a dry ditch.
- 3.4.3 Hedgerow species consisted of a mix of hawthorn, dog rose, elder, holly, blackthorn, elm, dogwood, damsons and bramble. Where present, tree species present in hedgerows typically included ash, sycamore, oak, hornbeam and beech, with crab apple and silver birch occasionally present also. There were no field margins associated with the hedgerows, with crops planted up to the hedgerow.
- 3.4.4 Where hedgerows were not present, field boundaries were marked by narrow margins of neutral grassland. Species composition within these areas was typical of agricultural margins, comprising species such as chickweed, fat hen, broad-leaved dock, sow thistle, herb Robert, red campion, nettle, hogweed, ground ivy, white dead nettle, common bent, foxtail and cocksfoot.
- 3.4.5 The banktops of the dry ditch comprised species including false oat grass, cocksfoot, poppy, nettle ragwort, timothy, creeping thistle, creeping bent, ribwort plantain, perennial rye grass, creeping cinquefoil, black medick, cornflower, bindweed, sow thistle, chickweed, broadleaved dock, mouse-ear and mayweed.

3.4.6 A summary of habitats is provided in Table 3:3 and photographs presented in **Appendix 2**.

Table 3:3: UKhab habitats summary

Habitat Code	Descriptions	Photo No
c1c	Arable fields	1, 2
g3c	Other neutral grassland	3,4
g3c	Other neutral grassland	3,4
u1c.839	Track	5
u1e.800	Road	-
h2a5	Species rich hedgerows	1, 2, 5
h3a6	Species poor hedgerows	1, 2, 5
r1.50.500	Ditch	6

3.5 Protected and Notable Species

3.5.1 Species relevant to the Proposed Development are referenced in the sections below.

Birds

3.5.2 HERC returned 5,877 bird records within 2km of the Site, representing a typical farmland bird assemblage. Species listed on Schedule 1 of the Wildlife and Countryside Act 1981 (as amended) that may breed within the Site (i.e., species recorded during the breeding season and typical UK breeding species) included barn owl, firecrest, hobby, peregrine, merlin, osprey, red kite and kingfisher.

3.5.3 A number of Birds of Conservation Concern 5, Red and Amber listed bird species were also present within the desk study records.

3.5.4 The Site provides suitable habitats to support a typical breeding and wintering farmland bird assemblage, including species listed on local and national Biodiversity Action Plans (BAP).

3.5.5 Hedgerows and trees within the Site provide suitable nesting habitat for a range of common bird species. No trees with suitable features to support barn owl were noted during the extended habitat survey, however a barn owl was noted as roosting within a tree along the Sites southern boundary.

Breeding Birds

3.5.6 All breeding species (or potential breeding species) recorded during the breeding bird surveys are detailed within **Table 3.5**. Full survey results and territory mapping are provided within the *Breeding Bird Survey Report (Appendix 1)*.

Table 3:4: Breeding bird species recorded on Site

(Notable species are included in bold)

Common Name	No. of Territories	Conservation Status	Comments
Red-legged Partridge	1	Non-native	N/A
Wood Pigeon	1	Amber	Associated with trees along the eastern Site boundary.
Blue Tit	2		Associated with boundary vegetation along eastern Site boundary and the lane separating the two parcels. Family group seen.
Great Tit	1		Associated with field boundary vegetation.

Common Name	No. of Territories	Conservation Status	Comments
Skylark	9	Red; S. 41	N/A
Lesser Whitethroat	1		Associated with field boundary vegetation.
Whitethroat	2	Amber	Associated with field boundary along the northern Site boundary.
Goldcrest	1		N/A
Wren	3	Amber	Associated with field boundary vegetation.
Robin	1		Pair seen along northern boundary of the Site.
Dunnock	4	Amber; S.41	Associated with field boundary vegetation.
Chaffinch	1		Associated with field boundary vegetation.
Goldfinch	2		N/A
Corn Bunting	2	Red; S. 41	Heard singing in field boundary vegetation in south of the Site.
Yellowhammer	2	Red; S. 41	Associated with field boundary vegetation

Conservation Status Key

WACA-Sch1: Wildlife and Countryside Act 1981 (as amended) Schedule 1 species

S.41: Natural Environment and Rural Communities (NERC) Act (2006)

Red: Red listed species within *Birds of Conservation Concern 5*

Amber: Amber listed species within *Birds of Conservation Concern 5*

LBAP: Local Biodiversity Action Plan

Bats

- 3.5.7 HERC returned 47 recent records of bats within 2km of the Site. Species included in the records included Natterer's bat, Leisler's bat, Daubenton's bat, serotine noctule, Nathusius' pipistrelle, common pipistrelle, soprano pipistrelle and brown long-eared bat, as well unidentified Myotis and unidentified bat species. The closest record was of common pipistrelle at Wymondley Transforming Station in 2019, immediately north of the Site. The nearest roost record was also of common pipistrelle located approximately 120m north of the Site in 2020.
- 3.5.8 Four European Protected Species Mitigation Licences (EPSML) have been granted relating to bats within 2km of the Site and are detailed in Table 3.6 below.

Table 3.6 Granted European Protected Species Licences for bats within 2km of the Site

Licence reference	Year	Species	Distance and direction from Site	Purpose of licence
EPSM2012-4641	2012	Common pipistrelle, brown long eared, Natterers	1.7 km west	Destruction of a breeding site
2017-32120-EPS-MIT	2017	Common pipistrelle	500 m west	Destruction of a breeding site
EPSM2009-533	2009	Common pipistrelle, brown long eared	170 m west	Destruction of a breeding site
2017-32115-EPS-MIT	2017	Common pipistrelle, soprano pipistrelle	135 m east	Destruction of a resting place

- 3.5.9 No trees or structures with bat roosting potential were observed during the extended habitat survey. Arable habitats offer poor quality foraging and commuting habitat, however boundary habitats such as hedgerows offer more suitable foraging and commuting habitat for bats.

Badger

- 3.5.10 HERC returned 100 recent records of badger (*Meles meles*) within 2km of the Site, the closest of which were of roadkill on roads immediately adjacent to the Site. The closest sett record was located approximately 100m south of the Site and was an undated record.
- 3.5.11 No setts or other evidence of badger was noted during the extended habitat survey. However, the Site provides suitable habitat for foraging and sett creation.

Otter and Water Vole

- 3.5.12 No recent records of otter or water vole were provided by HERC.
- 3.5.13 While a ditch was located within the Site, this was a dry field drain and therefore no watercourses are present within the Site that could provide suitable habitat for otter or water vole.
- 3.5.14 Due to an absence of suitable habitat within the Site, these species are not discussed further in this report.

Hazel dormouse

- 3.5.15 No records of hazel dormouse were provided by HERC.
- 3.5.16 Hedgerows within the Site contain suitable food sources for hazel dormouse, however connectivity to woodland blocks in the wider area is limited and therefore the species is considered likely to be absent.

Amphibians

- 3.5.17 HERC provided ten records of great crested newt and eight records of common toad.
- 3.5.18 One EPSML has been granted within 2km of the Site, located 1.17km north east of the Site. The licence, 2014-1797-EPS-MIT-1, was granted in 2014 for the destruction and damage to a great crested newt resting place.
- 3.5.19 No waterbodies were noted within the Site during the extended habitat survey. However, OS mapping indicates that seven waterbodies are present within 250m of the Site which may have the potential to support protected and/or notable amphibian species. Pond locations are shown on **Figure 5**.
- 3.5.20 Arable habitats within the Site have limited potential to support great crested newt, however they may utilise field margins and hedgerows for shelter and dispersal.

Reptiles

- 3.5.21 No recent records of reptiles were provided by HERC.
- 3.5.22 The Site is largely unsuitable for reptiles; however, field margins and hedgerows may provide some sub-optimal habitat for grass snake and slow worm. Good quality habitat appears largely absent in the wider area further reducing the likelihood of reptiles being present.

Invertebrates

- 3.5.23 HERC provided 170 recent records of notable invertebrates within 2km of the Site, comprised of 167 records of lepidoptera, two of beetles and one of bugs.
- 3.5.24 The Site lacks structural and botanical diversity and so provides limited suitability for notable invertebrates; however, hedgerows may be used as an egg laying and food resource by some lepidoptera species. Due to the common and widespread habitats within the Site, as well as frequent soil disturbance experiences due to the agricultural land use, it is considered that any invertebrate assemblage within the Site is likely to consist of common and widespread generalist species only.

Other Protected and Notable Species

- 3.5.25 HERC returned three recent records of brown hare and 37 recent records of hedgehog within 2km of the Site. The closest record of hare was 1.35km west of the Site from 2015 and the closest record of hedgehog was 120m north of the Site, also from 2015.
- 3.5.26 Hedgerows and field margins within the Site provide suitable habitat for both brown hare and hedgehog.

3.6 Invasive Non-native Species

- 3.6.1 HERC provided nine records of invasive non-native plant species (INNPS) listed on Schedule 9 of the Wildlife and Countryside Act (1981), as amended. Records included Himalayan balsam, Japanese knotweed, variegated yellow archangel, montbretia, Virginia creeper and rhododendron.
- 3.6.2 Additionally, records were provided of invasive non-native fauna, including Canada goose, muntjac deer, signal crayfish and grey squirrel.
- 3.6.3 No INNPS were observed within the Site during the extended habitat survey.

4 ASSESSMENT

4.1 Overview

- 4.1.1 This section seeks to identify the potential for effects to occur on habitats and protected and notable species which could be considered as reasonably likely to occur as a result of the Proposed Development. The Site's proximity to statutory and non-statutory designated sites and potential effects on their qualifying interests is discussed. Measures are proposed for the protection of sensitive habitats and species, and recommendations are made for further pre-construction surveys and mitigation, if required.
- 4.1.2 The Proposed Development has been designed to minimise the potential for effects on sensitive ecological features; thereby ensuring existing wildlife corridors and habitat connectivity are maintained and enhanced. A series of biodiversity enhancements have also been adopted.

4.2 Designated Sites

Statutory Designated Sites

- 4.2.1 The Site does not form part of any statutory site for nature conservation. One statutory designated site is present within 2km of the Site, this being Wain Wood SSSI. The Site lies outside any SSSI impact risk zones relating to solar developments.
- 4.2.2 Due to distance of the Site from Wain Wood SSSI and the lack of any pathway by which Wain Woods SSSI could be affected by the development, it is considered that the Proposed Development will have no impact on statutory designated sites.
- 4.2.3 Standard best practice pollution prevention will be enforced throughout construction to ensure no adverse effects upon retained and off-site habitats.

Non-Statutory Designated Sites

- 4.2.4 The Site does not form part of any non-statutory site for nature conservation. Fifteen non-statutory sites for nature conservation are present within 2km of the Site, the nearest being Wymondley Transforming Station LWS which lies approximately 10m north of the Site, separated by a local road.
- 4.2.5 LWS are designated primarily to prevent land management changes that may reduce their nature conservation value. Although there are LWSs in close proximity to the Site, it is not considered that there are any pathways by which the Proposed Development will have a negative impact upon any LWS.
- 4.2.6 Standard best practice pollution prevention will be enforced throughout construction to ensure no adverse effects upon retained and off-site habitats.

4.3 Priority and Irreplaceable Habitats

Priority Habitats

- 4.3.1 All areas listed on the PHI are separated from the Site by existing barriers such as roads.
- 4.3.2 Hedgerows and trees will be protected and retained throughout construction and operation of the Proposed Development, with the implementation of appropriate root protection zones in accordance with *BS8537:2012 Trees in relation to design, demolition and construction*.
- 4.3.3 It is therefore considered that there will be no adverse impacts to priority habitats as a result of the development.

Irreplaceable Habitats

- 4.3.4 No irreplaceable habitats, including ancient and veteran trees, are present within the Site. There are no ancient woodlands within 500m of the Site and the nearest veteran trees are located 270m north west of the Site. Due to distance between the Site and any irreplaceable habitats, it is considered that the Proposed Development will have no impact on irreplaceable habitats.

4.4 Habitats

- 4.4.1 Arable habitats within the Site have negligible nature conservation value. Tall ruderal habitats are restricted mostly to the Site margins which will remain unaffected and comprise common and widespread species only.
- 4.4.2 As part of the Proposed Development, the ground within the boundary fencing will be seeded with low maintenance pasture mix and land outside the boundary fencing will be seeded with a species rich (meadow) grassland mix. There will also be areas of tree planting to act as screening for the Proposed Development. It is considered these habitats will provide more varied and higher value habitat than those currently within the Site, as supported by the Biodiversity Net Gain Assessment.
- 4.4.3 Existing hedgerows within the Site will be retained and protected throughout works. In addition, the proposed landscape design includes the planting of additional hedgerow, and the gapping up of existing hedgerow.

4.5 Biodiversity Net Gain Assessment

Results

- 4.5.1 In order to assess the biodiversity impacts associated with the Proposed Development, the Defra Biodiversity Net Gain Metric Calculator was utilised. Based on the information provided within the Detailed Landscape Masterplan (3732-02, Rev G), the calculation results show that the Proposed Development will result in a clear biodiversity net gain of 95.87% in Habitat Units, 86.44% in Hedgerow Units and +17.65% watercourse units, exceeding the statutory minimum of 10%. The headline results extracted from the Metric spreadsheet are reproduced below. The full Metric spreadsheet is provided separately to this report.
- 4.5.2 The Proposed Development adheres to all trading principles enshrined within the Metric. The Metric does not account for species-specific mitigation measures referred to elsewhere in this assessment.

Biodiversity Net Gain Calculation Headline Results

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	67.11
	<i>Hedgerow units</i>	15.53
	<i>Watercourse units</i>	0.24
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	<i>Habitat units</i>	95.87%
	<i>Hedgerow units</i>	86.44%
	<i>Watercourse units</i>	17.65%
Trading rules satisfied?	Yes ✓	

Discussion

- 4.5.3 It is noted that the Resubmission Scheme achieves a lower percentage BNG score than the 2023 Scheme, despite a c. 9% reduction in panels. This is primary due to changes in how condition assessment and habitat categorisation have been applied following technical advice published alongside the Statutory Metric and updates to the UKHabitat survey methodology. It is considered that this assessment adheres to current best practice guidance regarding BNG, however if the 2023 Scheme habitat conditions were applied like-for-like to the Revised Scheme it would achieve approximately 141% gain, which is greater than the 2023 Scheme.

4.6 Protected and Notable Species

Birds

- 4.6.1 All wild birds, their nests and eggs are, with few exceptions, protected under the Wildlife and Countryside Act 1981 (as amended). Over eighty species or groups of species are listed under Schedule 1 of the Act, which confers special protection with increased penalties for offences committed.
- 4.6.2 Additionally, a further forty-nine bird species are listed under Section 41 of the NERC Act 2006 and four species listed in the Hertfordshire LBAP and are therefore, a material consideration within the planning process.
- 4.6.3 The breeding bird assemblage within the Site comprised of common and widespread species typical of farmland landscapes. Species were typically associated with field boundary habitats which will be retained and enhanced throughout construction and operation of the Proposed Development.
- 4.6.4 The landscape proposals include the planting of additional hedgerow and enhancement of existing hedgerows, as well as planting of woodland screening and meadow grassland. These proposals will enhance the Site for a range of bird species through the provision of greater nesting and foraging habitat.
- 4.6.5 In order to avoid impacts on nesting birds and to ensure compliance with the provisions of the Wildlife and Countryside Act 1981 (as amended), it is recommended that construction and any associated vegetation removal takes place outside of the bird breeding season (March-August inclusive). If vegetation works are necessary during the breeding season any suitable nesting habitat to be affected by works; including grassland habitats, should be checked by a suitably experienced ecologist immediately prior to works commencing. The ornithologist will advise on the appropriate action to

ensure legal compliance (this will include setting up an appropriately sized buffer and for a suitable time period; e.g., until the nest is no longer active).

- 4.6.6 To provide an enhancement for bats, the Proposed Development will include six bird boxes on retained trees surrounding the Site.

Ground Nesting Birds

- 4.6.7 A total of nine skylark territories were identified within the Site during breeding bird surveys.
- 4.6.8 While it is generally acknowledged that skylark are unlikely to nest within solar arrays, those skylarks within adjacent land will continue to use land under and around solar arrays as a foraging resource¹⁰, and may also use solar sites as a nursery area¹¹. In support of this, a comparative study by Montag *et al* (2016)¹² found no statistical difference in the number of territories between solar and control plots. As such, the presence of the Scheme does not render the Site unsuitable for use by Skylarks, but will reduce and potentially remove nesting opportunities.
- 4.6.9 While nesting opportunities within the array areas may be removed, it is expected that the presence of the solar farm and associated landscaping is likely to increase the productivity of ground nesting birds continuing to nest in the surrounding area, including both open areas retained within the Site and adjacent farmland. It is expected that productivity would be increased through permitting multiple nesting attempts in any given year (in contrast to many agricultural crops) as well through increases in invertebrate prey.
- 4.6.10 Throughout operation of the Scheme, the Site will offer a high value foraging resource for ground nesting birds that is guaranteed to persist for the lifetime of the solar development and that will not vary with cropping patterns, themselves influenced by market forces. Coupled with maintained areas of open grassland within the Site and agricultural land in proximity to the Scheme continuing to offer suitable nesting habitats, it is likely that the presence of the Scheme will contribute to negligible overall change in ground nesting bird productivity at a population level.

Bats

- 4.6.1 All species of British bat are listed under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). Bats are further protected under the Habitats Regulations.
- 4.6.2 Seven bat species in the UK are also listed as species of Principal Importance for the purpose of conserving biodiversity under Section 41 of the NERC Act 2006 and Natterer's bat is listed as priority species within the Hertfordshire LBAP.
- 4.6.3 No trees or structures with bat roosting potential were noted within the Site during the extended habitat survey.
- 4.6.4 The arable farmland within the Site has negligible value to foraging and commuting bats, with all suitable habitat restricted to boundary features, all of which are to be retained. Overall, the habitats within the Site are valued to be of moderate importance for foraging and commuting bats.

¹⁰ Solar Energy UK (2024) Solar Habitat 2024: Ecological Trends on Solar Farms in the UK

¹¹ Fox, H. (2022) Blithe Spirit: Are Skylarks Being Overlooked in Impact Assessment? InPractice, Issue 117

¹² Montag, H., Parker, G. and Clarkson T. (2016) The Effects of solar Farms on Local Biodiversity: A Comparative Study

- 4.6.5 The landscape proposals include the planting of additional hedgerow and enhancement of existing hedgerows, as well as planting of woodland screening and meadow grassland. These proposals will enhance the Site for foraging and commuting bats through the strengthening of linear features and increase to invertebrate prey.
- 4.6.6 Throughout construction no night time working is to be undertaken, and any lighting used will be directed away from important features for bats, including boundary features. During operation the Site will not be routinely lit, resulting in negligible impacts to foraging and commuting bats. It is considered that grassland creation within the Site will provide a greater foraging resource due to increased insect abundance.
- 4.6.7 It is not anticipated that any works to retained trees is to be undertaken, however in the event any works are required, trees will first be subject to an inspection by a suitable experienced ecologist. Should the tree be found to offer bat roosting potential, the tree will be felled following a Precautionary Working Method Statement if assessed as PRF-I or subject to further survey and / or licencing if PRF-M, in line with best practice guidance¹³.
- 4.6.8 To provide an enhancement for bats, the Proposed Development will include six bat boxes on retained trees surrounding the Site.

Badger

- 4.6.9 Badgers are afforded legislative protection under the Protection of Badgers Act 1992.
- 4.6.10 Sett interference includes damaging or destroying a sett, obstructing access to a sett, and disturbing a badger whilst it is occupying a sett. It is not illegal, and therefore a licence is not required, to carry out disturbing activities in the vicinity of a sett if no badger is disturbed and the sett is not damaged or destroyed. Where an activity is likely to result in an offence under the Protection of Badgers Act 1992, a licence from Natural England is required.
- 4.6.11 No evidence of badger setts or foraging within the Site was observed during the extended habitat survey, although they are known to be present within the wider area.
- 4.6.12 General measures will be implemented through construction for the protection of badger and other wildlife. This will include the backfilling or covering of any excavations left open overnight, or where this is not possible the fitting with an alternative means of escape.
- 4.6.13 Perimeter fencing will include mammal gaps to enable the free movement of badger within the Site, and therefore there will be no loss of foraging habitat or connectivity for the species.
- 4.6.14 Badger activity can show seasonal patterns of use and badgers can quickly establish new setts, or re-use setts previously thought to be inactive. Considering the highly mobile nature of badgers and the seasonality of their activity, a pre-construction survey should be undertaken prior to works commencing on Site by a suitably qualified ecologist. The survey will check for any newly constructed setts in and surrounding the Site.

¹³ Collin, J. (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th edition. The Bat Conservation Trust, London. ISBN-978-1-7395126-0-6

Amphibians

- 4.6.15 Great crested newts are protected by Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and the Habitats Regulations 2019.
- 4.6.16 Great crested newt, natterjack toad and common toad are also listed as priority species in England under Section 41 of the NERC Act 2006. Great crested newt is also listed as a priority species within the Hertfordshire LBAP.
- 4.6.17 No ponds are present within the Site with seven waterbodies identified from OS mapping and aerial imagery within 250m. Great crested newt and toad are known to be present within the wider area.
- 4.6.18 The Site currently comprises arable fields which do not provide suitable terrestrial habitat for amphibians and are subject to regular disturbance as a result of tilling and crop harvesting. Hedgerows and field margins bounding the Site, which currently comprise the only suitable terrestrial habitat within the Site will be retained throughout construction and operation of the development.
- 4.6.19 Although presence or absence surveys have not been undertaken on any ponds, it is considered likely that amphibians will be absent from the Site in its current land use, and that construction of the solar farm, which requires minimal ground works, will not result in harm or disturbance to amphibians
- 4.6.20 In addition, it is considered that enhancements to the hedgerows bounding the Site and the creation of lightly grazed pasture and species rich grassland, which will be both structurally and species diverse, will provide increased opportunities for amphibians.
- 4.6.21 As a precaution, any vegetation clearance of field margin vegetation will be undertaken following Reasonable Avoidance Measures (RAMs), including a visual and fingertip search by a suitably qualified ecologist, and a two stage cut of suitable vegetation.

Reptiles

- 4.6.22 Widespread reptile species namely the common lizard, slow worm, grass snake and adder are protected against killing, injuring and sale under Schedule 5 of the Wildlife & Countryside Act 1981 (as amended). These species are also listed as priority species under Section 41 of the NERC Act 2006.
- 4.6.23 The arable farmland habitat within the Site, has negligible potential for reptile species. More favourable habitats including field boundaries and hedgerows will be retained and protected throughout construction and operation.
- 4.6.24 In addition, it is considered that enhancements to the hedgerows bounding the Site and the creation of lightly grazed pasture and species rich grassland margins, which will be both structurally and species diverse, will provide increased opportunities for reptiles
- 4.6.25 As a precaution, any vegetation clearance of field margin vegetation will be undertaken following RAMs, including a visual and fingertip search by a suitably qualified ecologist, and a two stage cut of suitable vegetation.

Invertebrates

- 4.6.26 Invertebrate species within the Site are considered to consist of common and widespread species typical of a farmland landscape. In addition, the most valuable habitats for invertebrates as egg laying and food plants are likely to be within hedgerows, which will be retained and protected throughout works.

- 4.6.27 Hedgerows will be enhanced which will increase their value to invertebrates. In addition, grassland planting is proposed in the form of lightly grazed pasture and species rich grassland margins. This grassland will be of higher value to invertebrates than the existing arable land.

Other Species

- 4.6.28 Hedgerows and field margins within the Site provide suitable habitat for both brown hare and hedgehog. While there may be temporary disturbance to these species during construction, more favourable field boundary habitats will be retained and protected throughout works. In addition, the hedgerows will be enhanced through 'gapping up' and increased species richness which will improve habitat for these species. It is also considered that grassland creation within the Site will also improve habitat for these species due to a reduction in disturbance.

4.7 Invasive Non-native species

- 4.7.1 Section 23 of the Infrastructure Act 2015 amended the Wildlife and Countryside Act 1981 (as amended) by inserting a new Schedule 9A to introduce a statutory regime of species control agreements and orders. This schedule ensures that, landowners act on Schedule 9 invasive species, or permit others to enter the land and carry out those operations, to prevent their establishment and spread.
- 4.7.2 No invasive non-native plants were observed within the Site during the extended habitat survey. If any such invasive species be encountered onsite or immediately surrounding the Site prior to or during construction, the advice of a suitably qualified ecologist should be sought and the appropriate measures taken to prevent the inadvertent introduction or spread of such plants.

5 MITIGATION AND ENHANCEMENT SUMMARY

5.1.1 **Table 5:1** summarises the mitigation and enhancement recommended in for the Proposed Development.

Table 5:1: Mitigation and Enhancement Summary

Feature	Summary of Mitigation and Enhancement
Designated Sites	Standard best practice pollution prevention measures to be implemented to protect off-Site habitats
Habitats	- Existing features of biodiversity value will largely be retained and protected throughout the construction and operation phases. - All retained trees within the vicinity of construction areas will be protected during construction works in-line with BS 5837:2012 Trees in relation to design, demolition and construction. - Standard best practice pollution prevention measures will be implemented to prevent pollution and run-off occurring during the construction to protect retained and off-Site habitats. - The scheme delivers an +95.87% net gain in biodiversity units and 86.44+% gain in hedgerow units and +17.65% net gain in watercourse units.
Birds	- Removal of nesting bird habitats should be undertaken outside of the bird breeding season (01 March to 31 August inclusive). If vegetation works are necessary during the breeding season, suitable nesting habitat should be hand-searched by a suitably experienced ecologist prior to works commencing. Only when the ecologist is satisfied that no offence will occur under the legislation will works be permitted to proceed - Landscape design to provide habitat creation and enhancement for breeding and foraging bird species - Six bird boxes to be installed on suitable retained trees within the Site
Bats	- Landscape design to provide habitat creation and enhancement for foraging and commuting bat species - If any tree works are required preliminary bat roost assessments will be undertaken on any trees identified for removal, which may identify further mitigation or survey requirements, including dusk emergence/dawn re-entry surveys or inspections at height. - If bats are confirmed to be roosting within any tree to be impacted by proposed works, the data gathered would be used to support a licence application to Natural England to destroy/disturb the bat roost and to inform potential mitigation measure to reduce and/or avoid impacts if appropriate. - Six bat boxes to be installed on suitable retained trees within the Site
Badgers	- A pre-construction badger survey will be undertaken immediately prior to the commencement of development to check for any constructed setts in / within 30m of construction. - Standard measures to be implemented through construction to prevent entrapment within excavations
Reptiles and amphibians	Precautionary - Works affecting suitable habitat (if required) to be undertaken under Reasonable Avoidance Measures (RAMs).

Feature	Summary of Mitigation and Enhancement
	• Landscape design to provide habitat creation and enhancement for amphibians and reptiles
Invertebrates	• Landscape design to provide habitat creation and enhancement for invertebrate assemblages
Other Species	• Precautionary - Adoption of standard good practice measures during construction. • Landscape design to provide habitat creation and enhancement for a range of species
Invasive Species	• Pre-construction checks for new colonisation by invasive species should be undertaken. If required, measures will be employed to eradicate/control species such as Himalayan balsam to prevent the accidental introduction or spread.

Figure 1: Site Location Plan



Figure 2: Statutory Designated Sites Plan

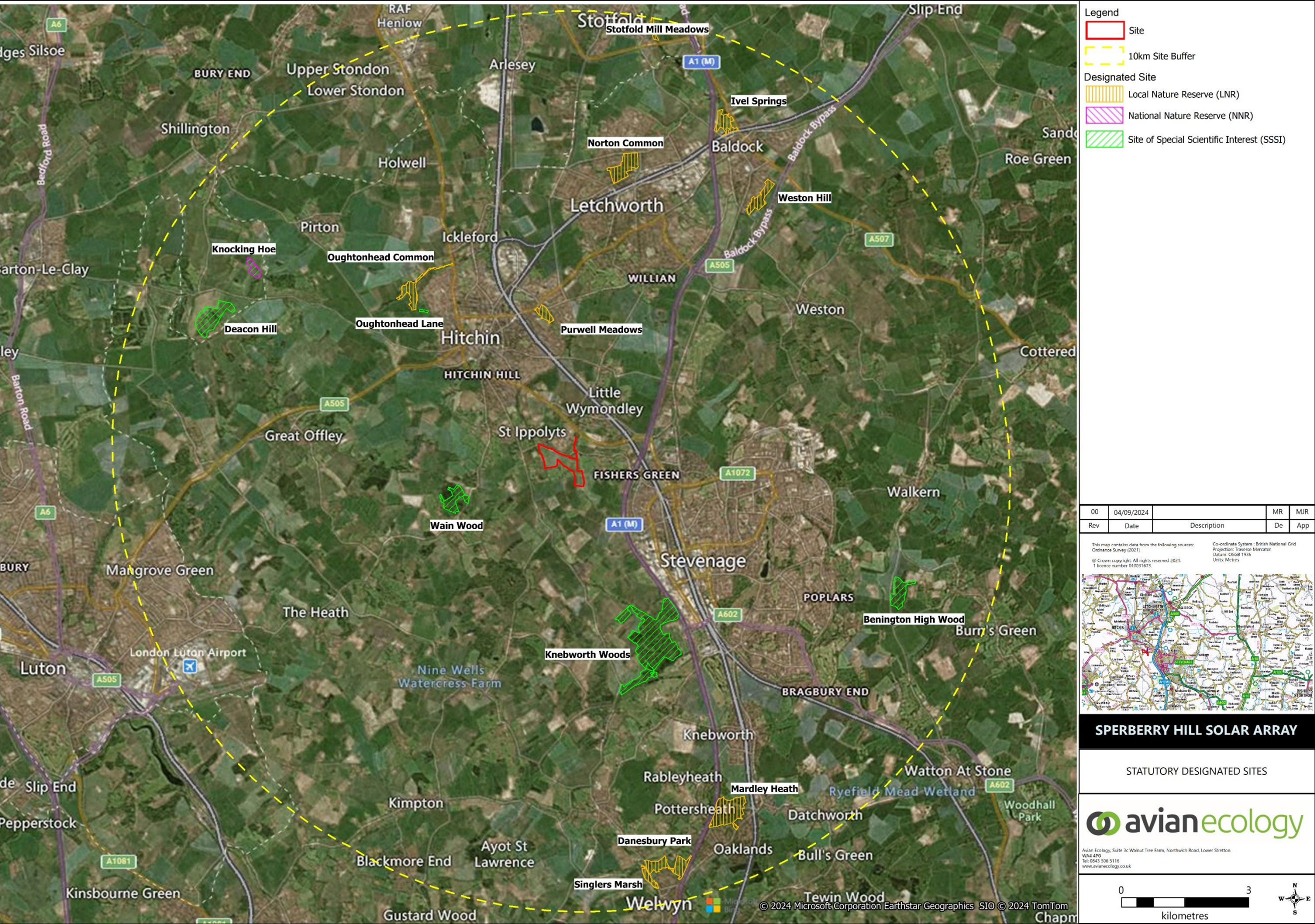


Figure 3: Non-statutory Designated Sites Plan

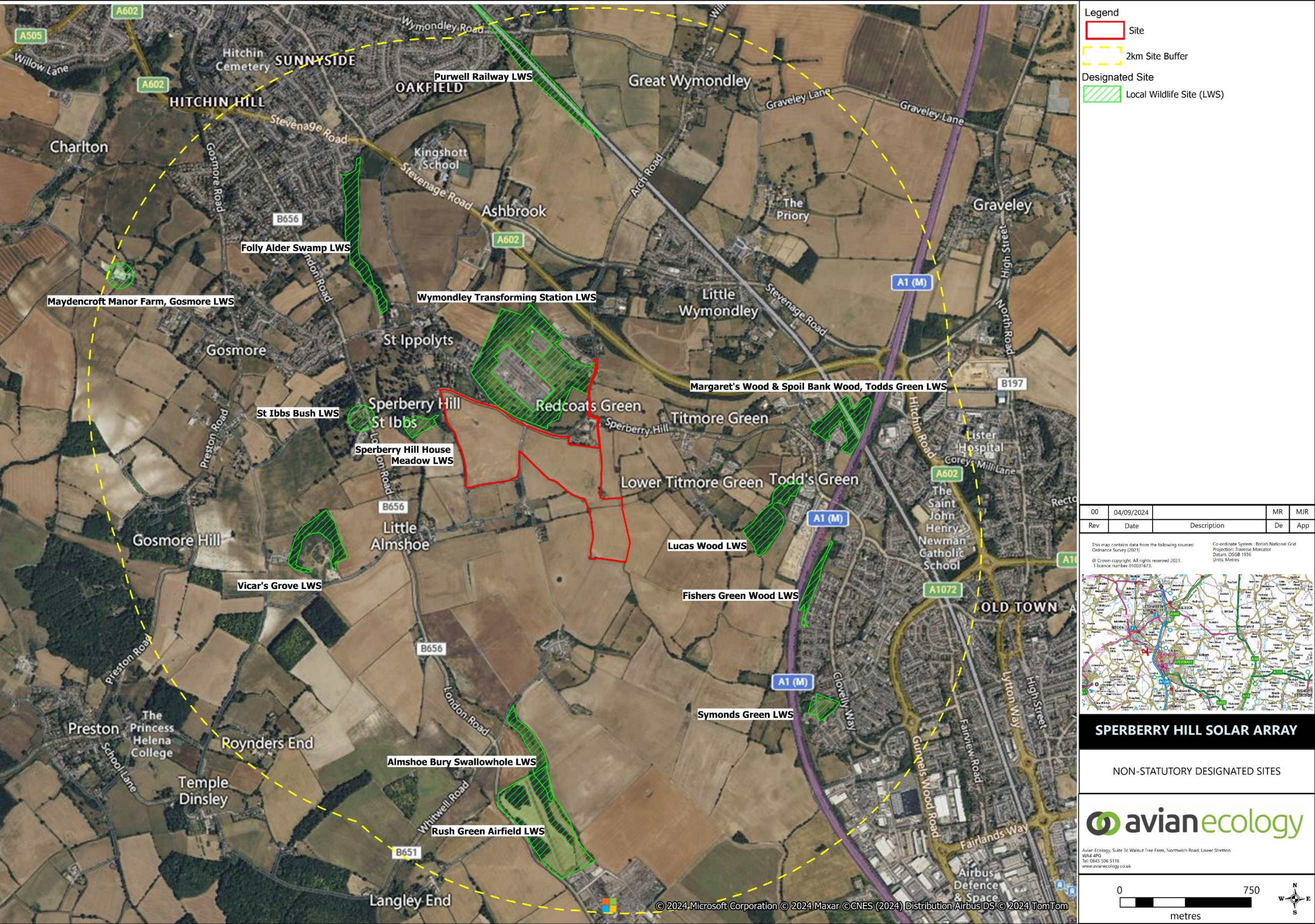


Figure 4: UK Habitat Survey Plan

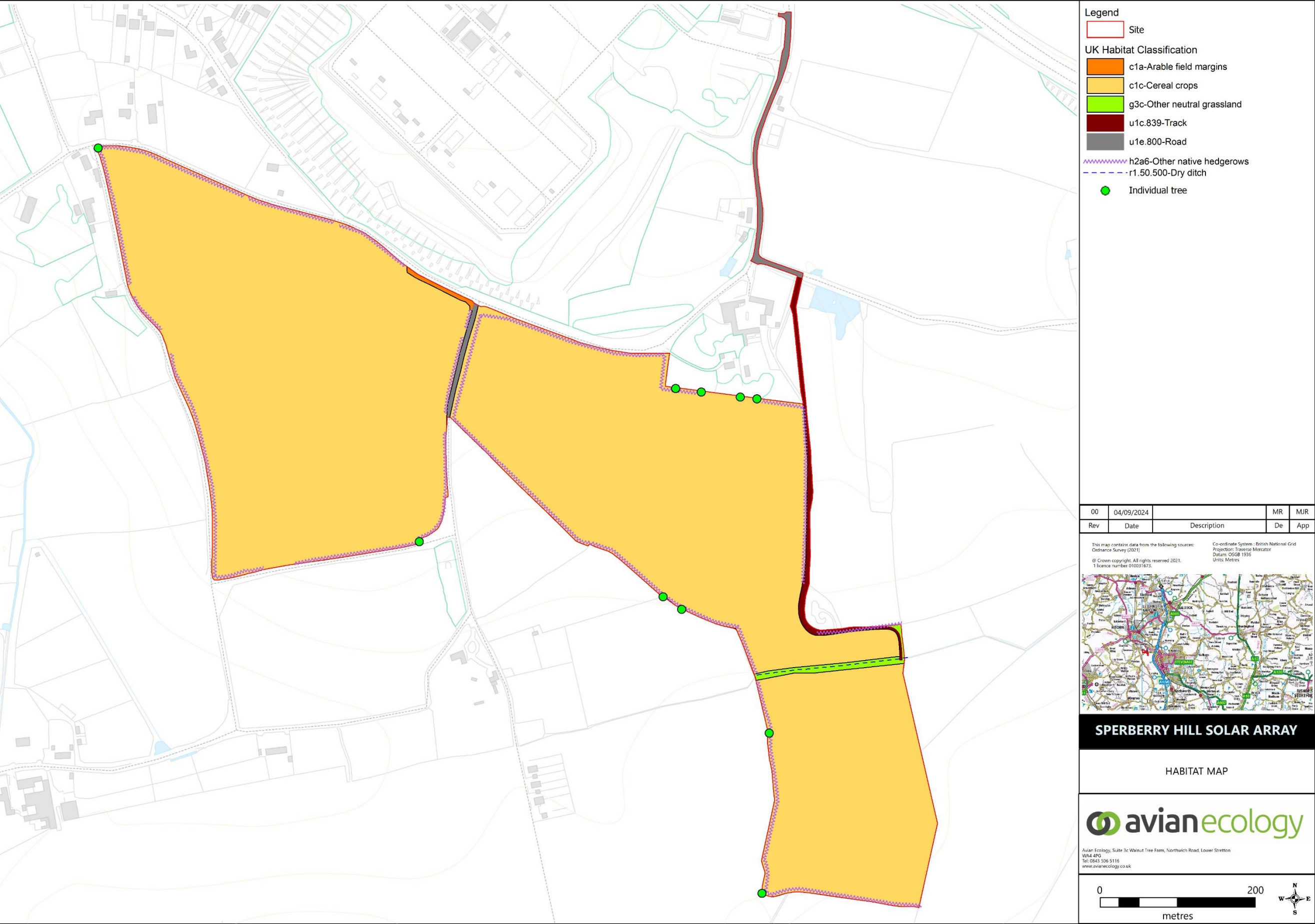
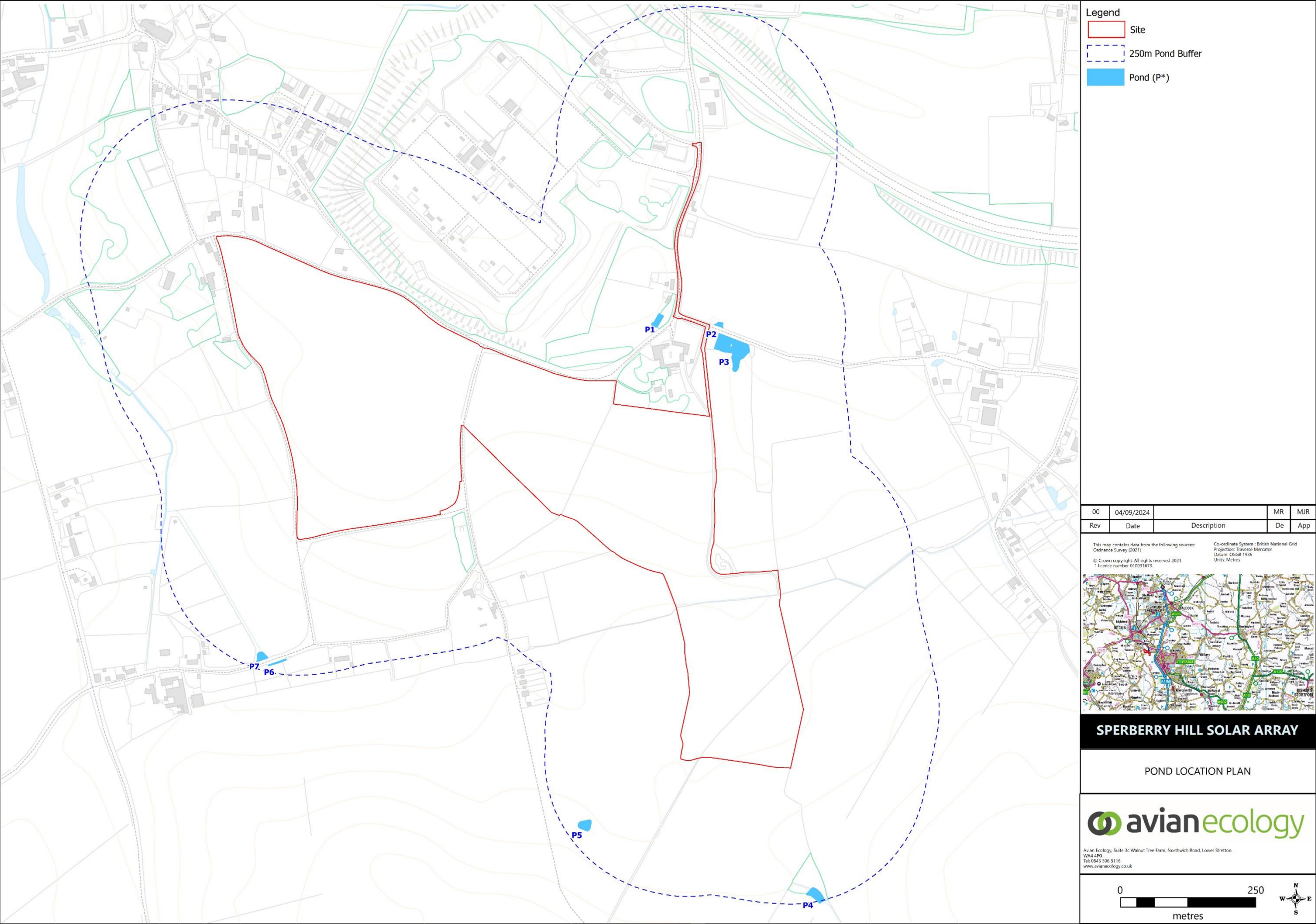


Figure 5: Pond Location Plan



Appendix 1

Breeding Bird Survey Report (provided separately)

Appendix 2

Photographs

Photographs	Description
	Photograph 1: Showing arable fields and hedgerows lacking a defined margin of vegetation within the westernmost field.

Photographs	Description
	Photograph 2: Showing arable fields and hedgerow within the east of the Site.
	Photograph 3: Showing unmanaged tall ruderal habitat where hedgerow is not present.

Photographs	Description
	Photograph 4: Showing area of grassland adjacent to Sperberry Hill Road.
	Photograph 5: Showing track around edge of field in east of the Site.

Photographs	Description
	Photograph 6: Dry ditch separating fields in east of site, including grassland margin.