



Well Street Mill, Well Street, Leek, Staffordshire, ST13 6BL
Preliminary Ecological Appraisal Report

Document Control

Client:	Amir Wahid
Project Title:	Well Street Mill, Well Street, Leek, Staffordshire, ST13 6BL
Report Title:	Preliminary Ecological Appraisal Report
Report Ref.:	P2719_01
Version:	V0
Status:	Final
Revision Comments:	-
Principal Author:	CM BSc (Hons), MSc
Technical Review:	TE BSc (Hons) MCIEEM
Issued to Client:	12 December 2024

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1. Summary

Table 1: Summary

Report Purpose	With reference to the development proposals and the applicable planning policy & legislation, the scope of the present report is to: - Identify key ecological constraints associated with the project. - Identify avoidance, mitigation or compensation measures likely to be required in accordance with the mitigation hierarchy. - Identify any additional surveys that may be required to inform the above. - Identify likely opportunities to deliver ecological enhancement.
Methodology	A desk study was carried out including a study of the UK Government MAGIC¹ website for designated sites of nature conservation, Natural England licensing, and the site in the context of habitat connectivity to the surrounding landscape. The field survey included a UKHab Habitat survey of the site, extended to consider protected species.
Key Notes	The individual trees on site are of local level ecological importance. Buildings B1-B3 offered suitable roosting opportunities for bats. Historic nesting bird evidence was present in the building B1. The site offered limited habitat suitability for foraging and commuting Eurasian badgers <i>Meles meles</i> and European hedgehog <i>Erinaceus europaeus</i>.
Conclusions	The following further work is required to inform the potential ecological impacts associated with the development proposals: Recommendation 1 – Bat surveys: The PRA survey assessed the building B2 as having moderate bat roosting suitability and building B1 as having low bat roosting suitability. With reference to best practice survey guidelines (Collins, 2023), two emergence surveys should be carried out on B2 and one emergence survey should be carried out on B1, to establish the presence/ likely absence of roosting bats. It is considered that the following remaining recommendations could be secured via condition(s): Recommendation 2 – Precautionary methods during works: Precautionary methods should be implemented during works to protect foraging and commuting badger, hedgehog, nesting birds, and bats. Recommendation 3 – Artificial lighting mitigation: Bats are present in the wider area. Where lighting is required, this should be sympathetic to wildlife through the design of lighting observing the principles set out in guidelines from the Bat Conservation Trust (BCT) & Institution of Lighting Professionals (BCT & ILP, 2018).

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

2. Introduction

Background

- 2.1. Elton Ecology Ltd was commissioned by Amir Wahid to conduct a Preliminary Ecological Appraisal (PEA) of the site known as Well Street Mill, Well Street, Leek, Staffordshire, ST13 6BL.
- 2.2. The resulting Preliminary Ecological Appraisal Report (PEAR) has been prepared by Ecologist CM BSc (Hons), MSc, accredited agent on Natural England Bat Licence Reference Number: 2018-33647-CLS-CLS. CM is experienced in undertaking ecology surveys, GIS mapping and report writing.

Site Description

- 2.3. The site comprises a disused four-storey mill building with a two-storey annexe and associated urban land. The site is located at Well Street Mill, Well Street, Leek, Staffordshire, Well Street Mill, Well Street, Leek, Staffordshire, ST13 6BL (Figure 1: Site Location Plan) (central OS grid reference: SJ 98926 56452).

Development Proposals

- 2.4. The development proposals include conversion of the existing buildings to apartments.
- 2.5. Relevant documents used to inform the assessment include:
 - Block Plan (Drawing Number: 0967 A105) (AK Innovative Design Solution, 31st July 2023)
 - 2D Topographic Survey (Drawing Number: SU0072_2D-01) (Land Map Surveys, 19th June 2024)

Report Purpose and Scope

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

Planning Policy and Legislation

- 2.7. A summary of biodiversity planning policies and wildlife legislation relevant to the site is provided in Appendix 1: Planning Policy and Legislation Summary. The relevant planning policy and legislation includes:
 - National Planning Policy Framework (NPPF) 2023.
 - Government Circular ODPM 06/05 Biodiversity and Geological Conservation.
 - The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

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

2.8. The site is covered by the Staffordshire Biodiversity Action Plan (BAP), which includes:

- Noctule bat *Nyctalus noctula*
- Pipistrelle bat *Pipistrellus sp.*

3. Methodology

Assessment

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

Personnel

- 3.2. The Preliminary Ecological Appraisal (PEA) and Preliminary Roost Assessment (PRA) was carried out by Ecologist CM BSc (Hons), MSc, accredited agent on Natural England Bat Licence Reference Number: 2018-33647-CLS-CLS. CM is experienced in undertaking ecology surveys, GIS mapping and report writing.
- 3.3. The Preliminary Ecological Appraisal (PEA) and Preliminary Roost Assessment (PRA) was assisted by Assistant Ecologist EM BSc (Hons), MSc. EM is a student member of CIEEM and is experienced in assisting ecology surveys, GIS mapping and report writing.

Desk Study

- 3.4. The sources of information and study areas of the desk study data are provided in Table 2.

Table 2: Desk study sources and areas

Feature		Study Area	Data Source	Date of Search
Designated sites of nature conservation	International (e.g. Special Area of Conservation, Special Protection Area, and Ramsar)	10 km radius of the site boundary	UK Government MAGIC ² website	05/12/2024
	National (e.g. Site of Special Scientific Interest (SSSI), SSSI Impact Risk Zones (SSSI IRZ)), Local Nature Reserves, National Nature Reserves	5 km radius of the site boundary		
Granted Natural England Mitigation Licences		2 km radius of the site boundary	UK Government MAGIC website	
Natural England Ancient Woodland Inventory		Site & 1 km radius of the site boundary		
Natural England Priority Habitat Inventory		Site & 1 km radius of the site boundary		
The site in the context of habitat connectivity to the surrounding landscape		2 km radius of the site boundary	Satellite and OS map data	
Relevant ecological information used to inform other planning applications		Site & surrounding area	LPA planning portal - Staffordshire	

² Multi-agency Geographic Information for the Countryside: www.magic.gov.uk.

Feature	Study Area	Data Source	Date of Search
		Moorlands District Council	

Field Survey

UKHab Habitat Survey

- 3.5. The UKHab Habitat survey was carried out on the 26th November 2024 and was extended to include an assessment for Natural Environment and Rural Communities Act (2006) Section 41 Habitats of Principal Importance (HPI) and of the sites potential to be used by protected or notable species as described below. The study area included the site boundary and a 30m radius for evidence of mobile protected species such as badger, access permitting. Weather conditions were appropriate for field survey with temperatures of 8°C, no rain, and good visibility.
- 3.6. The site was walked over, and botanical species lists of representative and notable plant species for each habitat type were recorded. Habitats were classified and mapped with reference to best practice guidelines from UKHab Ltd (2023). The nomenclature used for botanical species lists broadly follows that of Stace (2019). Protected or notable plant species were recorded where observed.

Amphibians (Including Great Crested Newt)

- 3.7. The habitats at the site were assessed for their suitability to support amphibians, including a search of the site for ponds and suitable terrestrial habitat. The desk study included a search of ponds within a 250m radius of the site.
- 3.8. The HSI was carried out with reference to Oldham *et al.* (2000), and as refined by ARG UK, (2010). The HSI provides a numerical index between 0 and 1, whereby 0 indicates unsuitable habitat and 1 indicates optimal habitat. Ten habitat variables 'Suitability Indices (SI)' are assessed, which are known to affect the suitability of a pond for the species, as follows:
- Geographic Location (SI₁)
 - Pond area (SI₂)
 - Permanence (SI₃)
 - Water Quality (SI₄)
 - Shade (SI₅)
 - Waterfowl (SI₆)
 - Fish (SI₇)
 - Pond Count (SI₈)
 - Terrestrial habitat (SI₉)
 - Macrophytes (SI₁₀)
- 3.9. The habitat variables are each assigned a numerical score. The HSI score is then a geometric mean of the ten suitability indices: $HSI = (SI_1 \times SI_2 \times SI_3 \times SI_4 \times SI_5 \times SI_6 \times SI_7 \times SI_8 \times SI_9 \times SI_{10})^{1/10}$
- 3.10. The HSI score result (i.e. the numerical index between 0 and 1) is categorised according to the pond suitability scale presented in Table 3.

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

HSI Score	Pond Suitability
<0.5	Poor
0.5-0.59	Below Average

0.6-0.69	Average
0.7-0.79	Good
>0.8	Excellent

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

Badger

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

Bats – Ground Level Tree Assessment

- 3.13. The preliminary Ground Level Tree Assessment (GLTA) was carried out with reference to best practice industry guidelines (Collins, 2023). The study area included all trees within the survey area.
- 3.14. The survey included a surveyor assessing the tree(s) from ground level aided by binoculars, noting potential bat entry/exit points, potential roosting features (PRFs), and any evidence of bats. The trees were graded for their suitability to support roosting bats, which will inform the need for further survey effort, if required, such as a potential roost feature (PRF) inspection via rope and harness access and/or nocturnal survey.
- 3.15. The suitability of the trees for roosting bats was then categorised with reference to best practice industry guidelines (Collins, 2023) (Table 4) as either none, further assessment required (FAR), potential roosting features present for individual bats (PRF-I), or potential roosting features present for multiple bats (PRF-M), which informs the need for further survey effort to establish the presence/ likely absence of roosting bats.

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

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

Bats - Preliminary Roost Assessment

- 3.16. The Preliminary Roost Assessment (PRA) was carried out on the 26th November 2024 with reference to best practice guidelines (Collins, 2023).

- 3.17. The survey involved a Natural England bat licenced surveyor making a detailed external and internal inspection of the building(s) on-site, compiling information on potential bat entry/exit points, roosting features, and any evidence of bats found (such as actual bat sightings, droppings, urine staining and fur-oil staining). The nomenclature used for bat species lists broadly follows that of Dietz and Kiefer (2018).
- 3.18. The PRA was aided as required by binoculars, a high-powered torch, and an endoscope to view features on the building and/ or search accessible cracks and crevices for the presence of bats where required.
- 3.19. The suitability of the building(s) for roosting bats was categorised with reference to best practice industry guidelines (Collins, 2023) (Table 5: Guidelines for Assessing the Potential Bat Roosting Suitability of Structures and Trees) as either negligible, low, moderate, or high. Suitability grading of buildings requires consideration of the potential roosting features on the building within the context of the suitability of the surrounding landscape to support commuting and foraging bats.

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

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

Bats – Commuting and Foraging

- 3.20. With reference to Table 5, an assessment of the habitats at the site to support commuting and foraging bats was made, within the context of habitat connectivity to features in the wider

landscape. The site was assessed as either negligible, low, moderate, or high suitability for commuting and foraging bats.

Nesting Birds

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

Hazel Dormouse

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

Terrestrial Invertebrates

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

Reptiles

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

Otter

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

Water Vole

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

Fish

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

Aquatic Invertebrates (including White-clawed Crayfish)

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

Other Mammals

- 3.29. An assessment of the site to support other mammals including brown hare *Lepus europaeus*, harvest mouse *Micromys minutus*, and hedgehog was also made.

Invasive Species

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

Limitations

- 3.31. It must be noted that survey effort has been made to provide detailed descriptions of the site within the context of potential usage by protected species, however a fully comprehensive assessment and prediction of natural factors cannot be made. The protected species assessment provides a professional view of the likelihood of such species being present and cannot be taken as a definitive presence or absence of the same. Systematic presence/ likely absence surveys for such species, which typically require multiple survey visits, have not been undertaken and are outside of the scope of Preliminary Ecological Appraisal. Such surveys are recommended in the present report if considered proportionate to the potential ecological impacts of the development proposals.
- 3.32. A full search of crevices and cavities on buildings typically cannot be made without specialist access equipment and in most cases intrusive works, and therefore accessible areas only have been searched for evidence of protected species and a negative result of evidence does not conclusively equate to absence of such species which may occupy inaccessible crevices on the building. However, provided any recommended nocturnal emergence/ re-entry bat survey(s) are undertaken, this is not considered a significant limitation to assessing the presence/ likely absence of roosting bats at the site.
- 3.33. Third party desk study data is not exhaustive, and an absence or a negative result of a species does not indicate the absence of protected species from the site/ search area.
- 3.34. The UKHab Habitat survey was undertaken outside of the optimal survey period of April to October. However, species identification of plants present outside of the optimal period is typically still possible based on the vegetative characteristics. Where additional surveys during the optimal period are required to assess the habitat type present, these are recommended.
- 3.35. The roof tiles of building B1 could not be observed during the survey due to the height of the building, however due to the further surveys recommended within this report, this limitation is not considered significant.
- 3.36. Access to the loft void in building B2 and internal of building B3 was not possible at the time of survey, however due to the further surveys recommended within this report, this limitation is not considered significant.
- 3.37. All dimensions, locations and distances provided are approximate.

4. Results

Desk Study

Surrounding Landscape

- 4.1. The surrounding landscape is primarily sub-urban (Figure 2: Surrounding Landscape Plan).
- 4.2. Habitat features favourable to ecology in the wider landscape include arable and pasture grazed fields, woodland, heathland, grazing marsh, standing open water, and parkland connected via hedgerows and treelines. The tree lined River Churnet is located approximately 1km northwest of the site.
- 4.3. Landscape features which may limit habitat quality and connectivity include artificial lighting, areas of hardstanding, and noise in the town of Leek.

Statutory Designated Sites

- 4.4. The site does not form part of an international or national designated site for nature conservation.
- 4.5. A summary of designated sites identified via the desk study are presented in Table 6 below.

Table 6: Summary of Statutory Designated Sites

Site Name	Designation	Description/ Reasons Designation	Main for	Distance from Site	& Direction
Brough Park Fields	Local Nature Reserve (LNR)	Grassland, woodland, and hedgerow habitats.		0.8km N	
Ledderedge Country Park	LNR	Grassland, marsh, and woodland habitat with a breeding population of great crested newt <i>Triturus cristatus</i> (GCN).		2km SW	
Thornccliffe Moor	Site of Scientific Interest (SSSI)	Upland heath, upland fen, acidic grassland, and stream habitats.		3.6km NE	
Combes Valley	SSSI	Ancient broadleaved woodland, acidic and neutral grassland, and stream habitat supporting breeding birds, insects, moths, and butterflies.		3.6km SE	
Leek Moors	SSSI	Acid grassland, dwarf shrub heath, and blanket mire habitats. Site supports breeding golden		4.9km NE	

Site Name	Designation	Description/ Reasons Designation	Main for	Distance & Direction from Site
		plover <i>Pluvialis apricaria</i> and snipe <i>Gallinago gallinago</i> .		
South Pennine Moors	Special Area of Conservation (SAC)	Dry heaths, blanket bogs, and old sessile oak <i>Quercus petraea</i> woodland habitats.		5km NE
Peak District Moors (South Pennine Moors Phase 1)	Special Protection Area (SPA)	Regularly supports breeding short-eared owl <i>Asio flammeus</i> , merlin <i>Falco columbarius</i> , and golden plover.		5km NE
Peak District Dales	SAC	Semi-natural dry grassland, <i>Tilio-Acerion</i> forest, and white-clawed crayfish populations.		9.8km E

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

Priority Habitats and Ancient Woodland

- 4.7. No priority habitats were noted on site via the desk study.
- 4.8. One ancient woodland was identified within the search radius via the desk study. The record related to Ballington Wood located approximately 0.7km south of the site.
- 4.9. A summary of priority habitats identified via the desk study are presented in Table 7 below.

Table 7: Summary of Priority Habitats

Habitat type	Distance & Direction of Closest Priority Habitat Type from Site
Deciduous woodland	0.1km S
Open mosaic habitats on previously developed land	0.2km S
Woodpasture and parkland	0.4km S

Relevant Ecological Information Used to Inform Other Planning Applications

- 4.10. No relevant ecological information used to inform other planning applications was identified via the desk study.

Field Survey

UKHab Habitat Survey

- 4.11. The habitats recorded at the survey site during the UKHab Habitat survey are presented in Table 8 and mapped on Figure 3: UKHab Habitat Plan.

Table 8: UKHab Habitat Assessment Results

UKHab Primary Code	Habitat Type	UKHab Secondary Code	Description	(NERC) Act 2006 HPI*	Habitat of Local Importance	Photograph Ref No. (Appendix 2: Photographs)
u1b5	Buildings		Three buildings were present on site. For full details, see Table 10: Preliminary Roost Assessment.	No	No	1-16
u1b6	Other developed land		Areas of tarmacked hardstanding were present in the north and south of the site. Two sycamore <i>Acer pseudoplatanus</i> trees were present in the east of this habitat.	No	No	17
u1e	Built linear features	612 - fence 853 - mortared wall	Mortared brick walls and Heras fencing were present on the site.	No	No	17
u1	Built-up areas and gardens	81 - ruderal or ephemeral 82 - vacant or derelict land	Sections of tall ruderal growing on impermeable sealed surfaces were present between buildings B1 and B2 and in the southwest of the site with vegetation cover approximately 90%. Species present included frequent buddleia <i>Buddleja davidii</i> , sycamore saplings, and Yorkshire-fog <i>Holcus lanatus</i> , and rarely present common nettle <i>Urtica dioica</i> , hart's-tongue <i>Phyllitis scolopendrium</i> , maidenhair spleenwort <i>Asplenium trichomanes</i> , herb-Robert <i>Geranium robertianum</i> , and creeping buttercup <i>Ranunculus repens</i> .	No	No	18-19

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

Protected/ Notable Species

- 4.12. The results of the protected/ notable species assessment undertaken during the Extended UKHab Habitat Survey are provided in Table 9 overleaf.
- 4.13. A summary of desk study results is also provided in Table 9.

Table 9: Protected/ Notable Species Assessment

Species/ Species Group	Desk Study	Evidence Observed During Extended UKHab Habitat Survey	Suitability of Habitats Present
Amphibians (including great crested newt <i>Triturus cristatus</i>)	No previous granted mitigation licences relating to GCN were noted within 2km of the survey site. No records of Great Crested Newt Class Survey Licence Returns were noted during the desk study. No records of Great Crested Newt Pond Surveys 2017 - 2019 recording GCN as present were noted during the desk study.	No evidence observed.	No ponds were present on site. One pond was present within a 250m radius of the site. Pond P1 related to a sub-urban park pond located approximately 130m south of the site. See Table 11 for a summary of Habitat Suitability Index Results. The areas of ruderal offered limited suitability for amphibians, however the surrounding urban built features offered limited connectivity to surrounding habitats and therefore these species are not considered further.
Badger	N/A	No evidence observed.	The areas of ruderal offered limited suitability for badgers.
Bats – GLTA	Four previous granted mitigation licences relating to bats were noted within 2km of the survey site. The closest licence allowed for the destruction of a non-breeding resting place for common pipistrelle <i>Pipistrellus pipistrellus</i> at a location approximately 0.4km east of the site between 2010 and 2012. The second licence related to a site for common pipistrelle at a location approximately 0.9km north of the site during an unknown date. The third licence allowed for the destruction of a non-breeding resting place for common pipistrelle and noctule at a location approximately 1km west of the site between 2019 and 2024. The fourth licence allowed for the destruction of a breeding site for brown long-eared bat <i>Plecotus auritus</i> at a location approximately 1.9km south of the site between 2013 and 2015.	No evidence observed.	No trees with PRFs were noted during the survey.
Bats - PRA			For full details of the Preliminary Roost Assessment, see Table 10.
Bats – commuting and foraging			The site offered low suitability for commuting and foraging bats comprising small and isolated patches of ruderal and scattered trees set within a sub-urban environment.
Birds	N/A	One deceased bird was present in the insulation in the southeast of the third floor of building B1 at target note TN1, with the layer of insulation potentially used as nesting material (Figure 3: UKHab Habitat Plan, Appendix 2: Photographs, Photo 20). Insulation was present within a missing brick gap in the northwest of the second floor of B1 at target note TN1, potentially used as nesting material.	The buildings and trees on site offered suitable nesting habitat for birds.
Hazel dormouse	The site is outside of the known distribution area for hazel dormouse. This species is not considered further.		
Fish, otter, water vole, and aquatic invertebrates (including white-clawed crayfish)	Due to the lack of suitable watercourses and waterbodies present on site and in the surrounding landscape, these species are not considered further.		
Terrestrial invertebrates	N/A	No evidence observed.	The areas of ruderal offered limited suitability for terrestrial invertebrates.

Reptiles	N/A	No evidence observed.	The areas of ruderal offered limited suitability for reptiles, however the surrounding urban built features offered limited connectivity to surrounding habitats and therefore these species are not considered further.
Other Mammals (including brown hare, harvest mouse, and hedgehog)	N/A	No evidence observed.	The areas of ruderal offered limited suitability for hedgehogs.
Invasive species	N/A	No evidence observed.	N/A

Table 10: Preliminary Roost Assessment Results

Building Reference Number***	Building Description	Potential Bat Access Points & Potential Roosting Locations	Evidence of Bats Recorded	Suitability Grading	Photograph Ref No. (Appendix 2: Photographs)
B1	Building B1 related to the four-storey disused mill building in the northwest of site. The building was approximately 26m in length, 9m in width, and 10m in height. The clay tile roof was pitched and the walls comprised brick. Windows were present throughout on all four storeys. Internally, the building was open to the roof pitch, with evidence of a former loft void present. The roof structure comprised timber ridge beams, rafters, and king post truss, with bitumen felt lining present. A layer of insulation was present on the former loft void structure. Light spill was present via the windows on the third storey.	Potential bat access points included under lifted tiles on the east elevation, through a gap in the grating on the south elevation, and through broken windows on the west elevation. Potential bat access points included at beam convergence points, between the tiles and the bitumen felt lining, and on top of the walls between the wall and the roof.	No evidence observed.	Low	1-8
B2	Building B2 related to the two-storey disused residential annexe building to the mill B1 in the northeast of the site. The building was connected to B1 via a two-storey timber framed corridor on the west elevation. The building was approximately 22m in length, 9m in width, and 6m in height. The clay tile roof was pitched with a mansard roof on the west elevation. A bitumen felt flat roof section was present over the connecting corridor, and the walls comprised brick with hanging clay tiles present on the flat roof section. A parapet wall was present on the east elevation and skylights were present on the east and west elevations. Internally, a loft void of approximately 3m and false ceiling of approximately 1m were present. Access to the loft void was not possible at the time of survey, however holes providing visibility into the loft void were present. The roof structure comprised timber trusses and unidentified boarding, with bitumen felt lining between the tiles and the boarding. Light spill was present via the skylights and a gap was present in the boarding.	Potential bat access points included under slipped and missing tiles on the west elevation, through the gap between the tiles and the flashing separating the pitches of the mansard roof on the west elevation, under the boarding covering the smashed skylight on the west elevation, gaps under the ridge tiles on the west elevation, under the eaves on the west elevation, in the gap above the slipped brick on the east elevation, and through the hole above the door on the north elevation. Potential roosting locations included between the tiles and the roofing felt and between the roofing felt and the boarding.	No evidence observed.	Moderate	4, 9-15
B3	Building B3 related to the single-storey utilities building in the east of the site. The building was approximately 2m in length, width, and height. The walls and flat roof comprised brick. A metal meshed door with a timber board was present on the south elevation. Internal access was not present at the time of survey.	Potential bat access points included through the gap in the metal door on the south elevation.	No evidence observed.	Low	16

***See Figure 3: UKHab Habitat Plan for building reference numbers.

4.14. The results of the HSI assessment of ponds on site and within a 250m radius of the site are presented Table 11 below. See Appendix 3 for the full breakdown of the HSI assessment.

Table 11: Summary of Habitat Suitability Index Results

Pond Number**	Distance From Site	HSI Score	HSI Result	Description	Photo Ref
P1	130m S	0.68	Average	Sub-urban park pond.	21

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

5. Ecological Constraints & Opportunities

- 5.1. The ecological constraints and opportunities, and recommendations for avoidance, mitigation, or further survey (where required) are provided in Table 12 overleaf.

Table 12: Ecological Constraints & Opportunities

Ecological Feature	Potential Ecological Impact & Level of Constraint	Potential Avoidance, Mitigation and/or Compensation Measures	Further Survey Required to Inform an Ecological Impact Assessment
Statutory Designated Sites	It is considered that the development will not adversely impact on the designated sites for nature conservation identified in the desk study, due the distance between the designated sites and the development site, and the small scale of the works proposed.	N/A	No further surveys required.
Priority habitats	The National Planning Policy Framework 2023 sets out that: <i>'185. To protect and enhance biodiversity and geodiversity, plans should:</i> <i>[...] b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species [...].'</i> The NPPF 2023 defines Priority Habitats and Habitats of Principal Importance included in the England Biodiversity List published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006. No Priority Habitats were identified on site.	N/A	No further surveys required.
Habitats (general)	The trees on site are considered to be of local level ecological importance. However, these should be retained where possible. The remaining habitats on site are considered to be common and widespread habitats of low conservation importance. However, cumulatively these habitats have local conservation value taken as the biodiversity value of the site. Elton Ecology Ltd are advised that under the current development proposals, the trees on site are to be retained.	Retained trees should be protected via exclusion zones during works with reference to <i>British Standard (BS 5837:2012): Trees in Relation to Design, Demolition and Construction – Recommendations</i> .	No further surveys required.
Badgers	Badgers are afforded legal protection under the Protection of Badgers Act 1992. No evidence of badger was recorded during the survey, however their presence in the landscape cannot be fully discounted. There remains a residual risk of badger injury and mortality during construction should this species be mobile in the area. There may be some removal of suitable badger habitat on site to facilitate the proposed works, including the removal of areas of tall ruderal.	Precautionary methods should be implemented during works to protect foraging and commuting badger. Foundation ditches and other ditches, excavations, or trenches, which can be hazardous to badgers, should be closed overnight or fitted with roughened sloping boards or steps to allow animals to escape should they become trapped. Concrete should not be left unset overnight, or suitable barriers erected to prevent animals accessing the concrete. Pipework with a diameter greater than 120mm should have the ends closed off overnight to prevent entrapment.	No further surveys required.
Birds	Nesting birds are afforded legal protection under the Wildlife and Countryside Act 1981 (as amended). The habitats on site including trees and buildings offer suitable nesting bird habitat, with evidence of historical nesting birds found. Under the current development proposals, the buildings are to be converted.	Where works affecting nesting bird habitat on site cannot avoid the nesting bird season of March to August (inclusive) and September in mild years, the habitat to be subject to works should be surveyed for nesting birds immediately prior to removal by a suitably qualified ecologist. If nesting birds are recorded, a suitable buffer zone should be defined by the ecologist and implemented until the ecologist confirms the chicks have fledged. If species identification is possible, this can be used to inform the typical egg incubation and fledging period, giving an indication of an appropriate time for re-survey to confirm fledging.	No further surveys required.

Ecological Feature	Potential Ecological Impact & Level of Constraint	Potential Avoidance, Mitigation and/or Compensation Measures	Further Survey Required to Inform an Ecological Impact Assessment
Bats	Bats are a fully protected European Protected Species (EPS) under The Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981 (as amended). The development proposals include the conversion of buildings B1 and B2, and the potential demolition of building B3 which may result in harm or disturbance caused to any bats or bat roosts which may be present on site. The buildings B1 and B3 were assessed as having low suitability for roosting bats, with reference to best practice survey guidelines (Collins, 2023), further surveys are required to assess the likely presence/absence of roosting bats. See adjacent column. The building B2 was assessed as having moderate suitability for roosting bats, with reference to best practice survey guidelines (Collins, 2023), further surveys are required to assess the likely presence/absence of roosting bats. See adjacent column.	Should roosting bats be present at the site, a Natural England mitigation licence may be required to demolish the building(s) on-site lawfully. The building B3 was assessed as having low suitability for roosting bats. Should B3 be impacted by works, with reference to best practice guidelines (Collins, 2023) it is considered sufficient to carry out works to the building under a Precautionary Working Method Statement for bats, overseen by a suitably qualified ecologist. Due to the presence of bats in the wider landscape, as highlighted in the desk study the impacts from external artificial lighting at the site on adjacent habitats should be avoided. Where lighting is required, this should be sympathetic to wildlife through the design of lighting observing the principles set out in guidelines from the Bat Conservation Trust (BCT) & Institution of Lighting Professionals (BCT & ILP, 2018).	The PRA survey assessed the building B1 as having low bat roosting suitability. With reference to best practice survey guidelines (Collins, 2023), one emergence survey should be carried out on the building, to establish the presence/ likely absence of roosting bats. With reference to the guidelines, the emergence survey should be carried out during the May-August bat activity season to establish the presence/likely absence of roosting bats. The PRA survey assessed the building B2 as having moderate bat roosting suitability. With reference to best practice survey guidelines (Collins, 2023), two emergence surveys should be carried out on the building, to establish the presence/ likely absence of roosting bats. With reference to the guidelines, at least one emergence survey should be carried out during the May-August bat activity season. One survey may be within September.
Other Mammals	Some mammals, such as hedgehog and brown hare, are listed as Species of Principal Importance in England under section 41 of the Natural Environment and Rural Communities Act 2006. These species are termed 'Priority' species and receive special considerations in the planning process. The Wild Mammals (Protection) Act 1996 makes it an offence to mutilate, kick, beat, nail or otherwise impale, stab, burn, stone, crush, drown, drag or asphyxiate any wild mammal with intent to inflict unnecessary suffering. There may be some removal of suitable hedgehog habitat on site to facilitate the proposed works, including the removal of areas of tall ruderal.	The precautionary working methods implemented for badger will also protect other mammals such as hedgehog. Any new fencing which may fragment the landscape for hedgehog should include a 13cm square hole at the base to allow for hedgehog migration through the site.	No further surveys required.
Invasive Non-Native Species (INNS)	Schedule 9 of The Wildlife and Countryside Act 1981 (as amended by the Countryside and Rights of Way Act 2000) makes it an offence to cause any plant listed to grow in the wild unless all reasonable steps were taken to prevent an offence and due diligence was exercised. No INNS were observed on site.	N/A	No further surveys required.

6. Conclusions

Further Surveys

- 6.1. The following further ecological surveys are required to inform the impact of the proposed development:
- The PRA survey assessed the building B1 as having low bat roosting suitability. With reference to best practice survey guidelines (Collins, 2023), one emergence survey should be carried out on the building, to establish the presence/ likely absence of roosting bats. With reference to the guidelines, the emergence survey should be carried out during the May-August bat activity season to establish the presence/likely absence of roosting bats.
 - The PRA survey assessed the building B2 as having moderate bat roosting suitability. With reference to best practice survey guidelines (Collins, 2023), two emergence surveys should be carried out on the building, to establish the presence/ likely absence of roosting bats. With reference to the guidelines, at least one emergence survey should be carried out during the May-August bat activity season. One survey may be within September.

Biodiversity Enhancement

- 6.2. Suitable methods of biodiversity enhancement for the site would include:
- An appropriate method of site enhancement for nesting birds would include the installation of integrated swift bricks, forming permanent nesting features, on the converted annexe building B2. Suitable models include the '*Vivara Pro Cambridge Brick Faced Swift Nest Box*' or the '*Ibstock Eco-habitat for Swifts*'. Swift bricks should ideally be sited under the eaves, and should be at least 5m above the ground, with an unobstructed flight path. Swift bricks should not be in direct sunlight, with a north or east aspect preferred. Swifts breed in colonies, so it is recommended at least 2 or 3 swift bricks are installed at least 40cm apart. Other birds including house sparrow and tits also nest in swift bricks. Potential perches for predators (such as aerals) should not be fitted in close proximity to the nest brick entrance hole.

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8. Figures

Figure 1: Site Location & Building Plan (Overleaf)

Figure 2: Surrounding Landscape Plan (Overleaf)

Figure 3: UKHab Habitat Plan (Overleaf)

Figure 4: Pond Plan (Overleaf)



Legend

Site Boundary

Project:

**Well Street Mill, Well Street, Leek,
Staffordshire, ST13 6BL**

Drawing:

Figure 1: Site Location Plan

Date: 09-12-2024

Version: FINAL

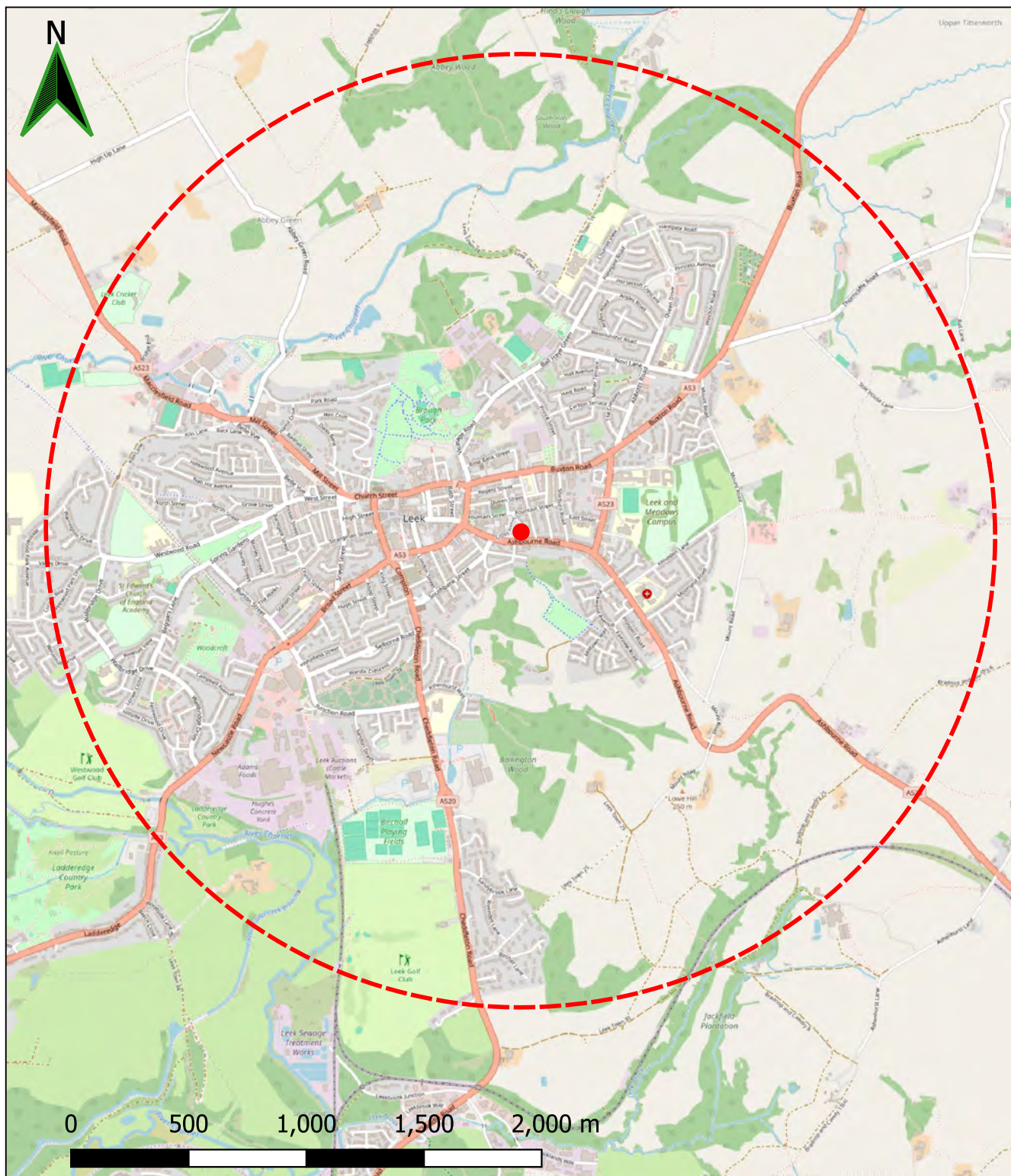
Author: CM

Job No: P2719



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Legend

- Site Location
- 2km Buffer

Project:

**Well Street Mill, Well Street, Leek,
Staffordshire, ST13 6BL**

Drawing:

Figure 2: Surrounding Landscape Plan

Date: 09-12-2024

Version: FINAL

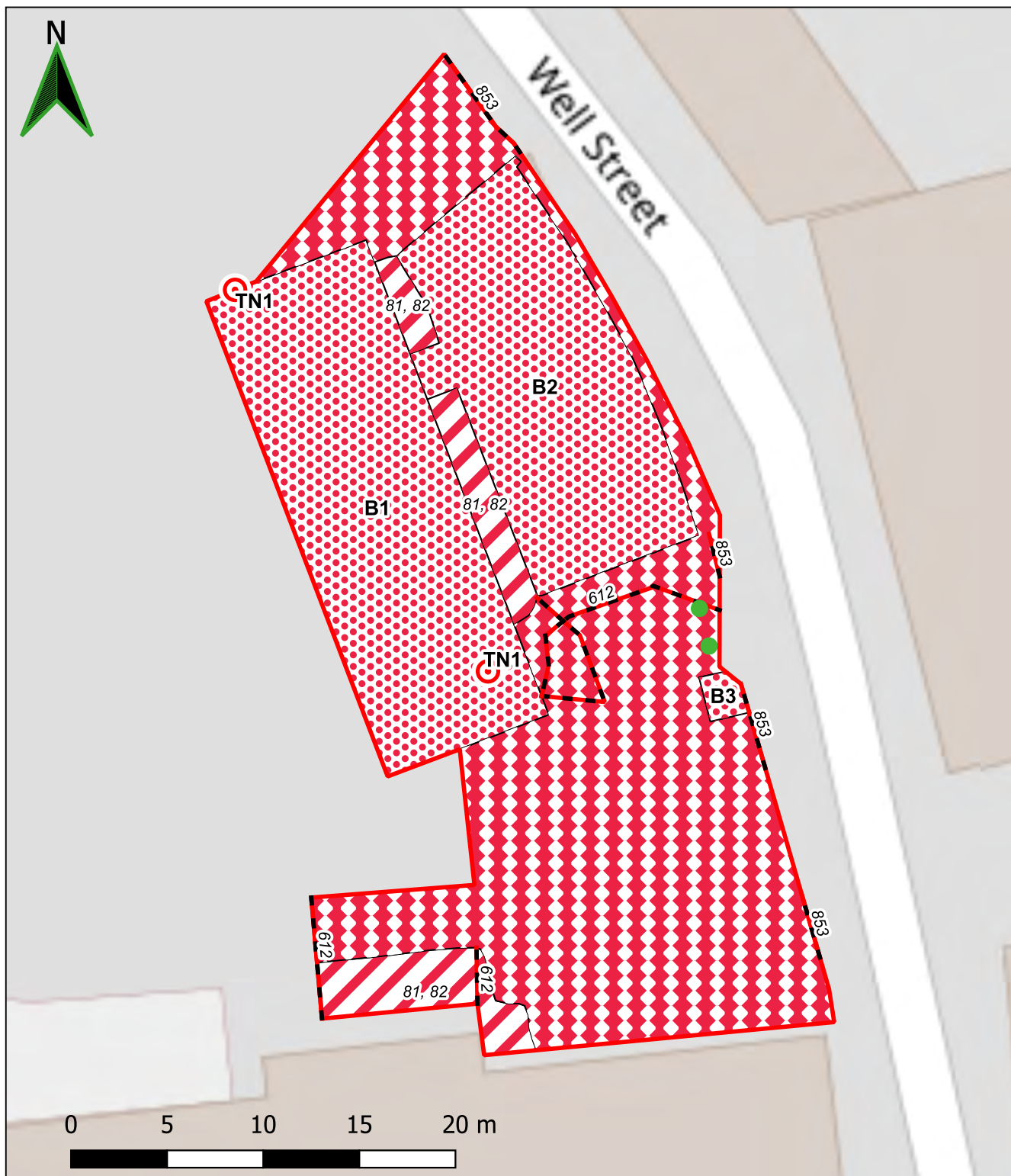
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Job No: P2719



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Legend

-  Site Boundary
-  u1 - Built-up Areas and Gardens
-  u1b5 - Buildings
-  u1b6 - Other Developed Land
-  u1e - Built Linear Features
-  Target Note with Reference Number
-  Individual Tree

Project:

**Well Street Mill, Well Street, Leek,
Staffordshire, ST13 6BL**

Drawing:

Figure 3: UKHab Habitat Plan

Date: 09-12-2024

Version: FINAL

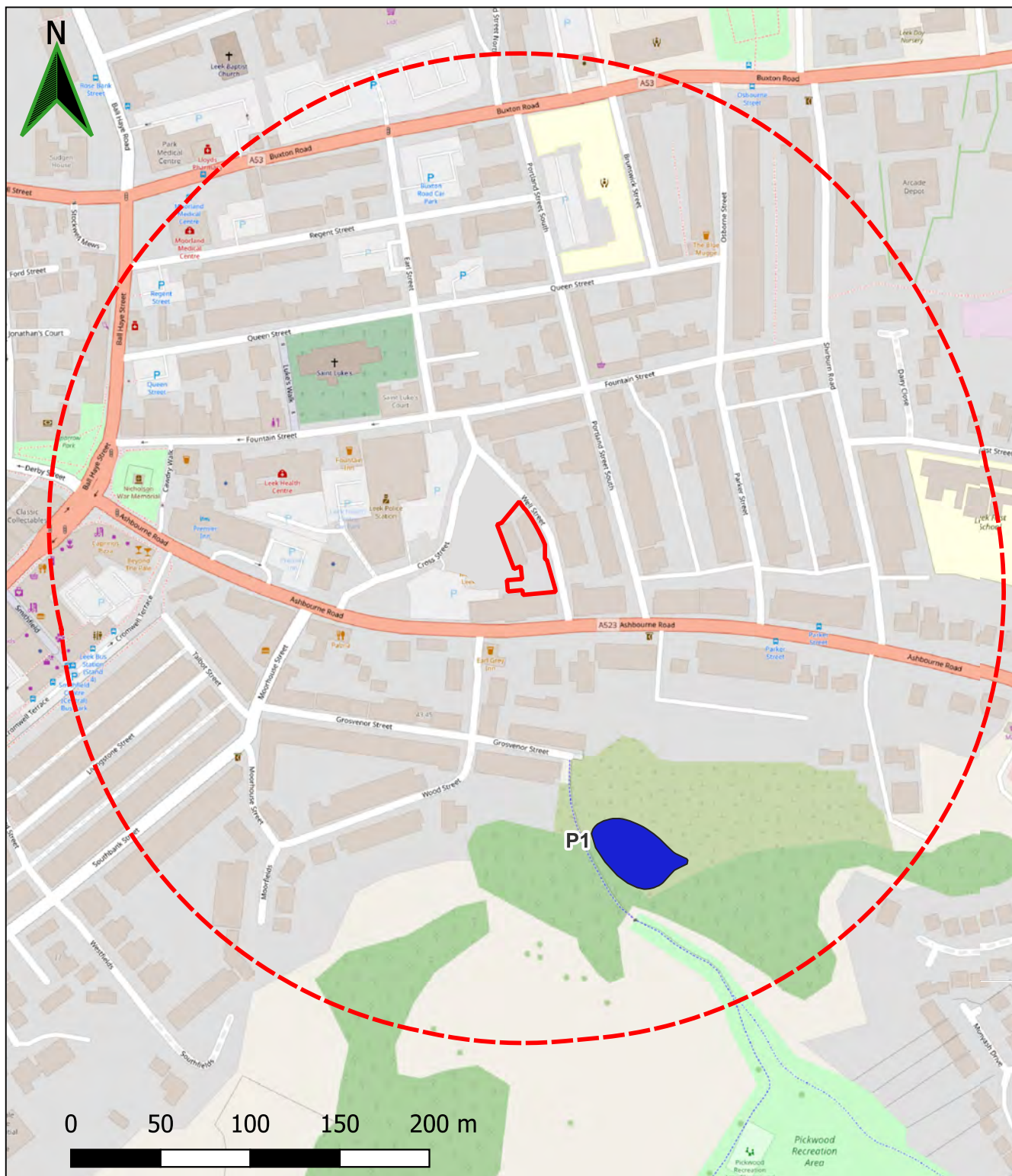
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Legend

-  Site Boundary
-  250m Pond Buffer
-  Pond with Reference Number

Project:
**Well Street Mill, Well Street, Leek,
Staffordshire, ST13 6BL**

Drawing:
Figure 4: Pond Plan

Date: 09-12-2024 Version: FINAL
Author: CM Job No: P2719



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Appendix 1: Planning Policy & Legislation Summary

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

National Planning Policy Framework 2023

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

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

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

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

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

- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
- recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; [...]
- minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. [...]

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

- “Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity⁶⁵; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”

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

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

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

- development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
- development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.”

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

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

Paragraph 188 states that “The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or projects will not adversely affect the integrity of the habitats site.”

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

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

Government Circular ODPM 06/05 Biodiversity and Geological Conservation

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

Relating to protected species and the requirement for their consideration in planning applications, the government circular, in paragraph 98 details that:

“The presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat. Local authorities should consult English Nature [now Natural England] before granting planning permission. They should consider attaching appropriate planning conditions or entering into planning obligations under which the developer would take steps to secure the long-term protection of the species. They should also advise

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

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

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

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

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

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

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

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

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

Wildlife and Countryside Act 1981 (As Amended)

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

- Intentionally kill, injure or take;

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

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

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

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

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

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

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

Natural Environment and Rural Communities Act 2006

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

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

Wild Mammals (Protection) Act 1996 (as amended)

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

Appendix 2: Photographs



Photo 1: South and east elevation of B1.



Photo 2: North and east elevation of B1.

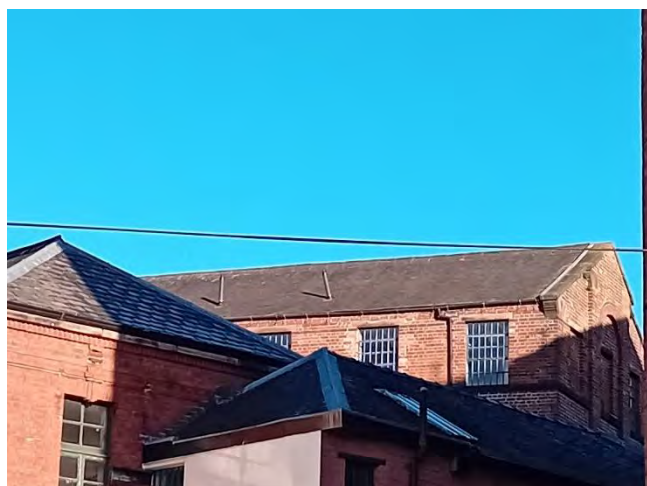


Photo 3: West elevation of B1.



Photo 4: East elevation of B1, west elevation of B2, and the corridor between the two buildings.



Photo 5: Internal roof structure of B1.



Photo 6: Internal third floor of B1.



Photo 7: Internal north gable of B1.



Photo 8: Gap in the grating on the south elevation of B1.



Photo 9: South elevation of B2.

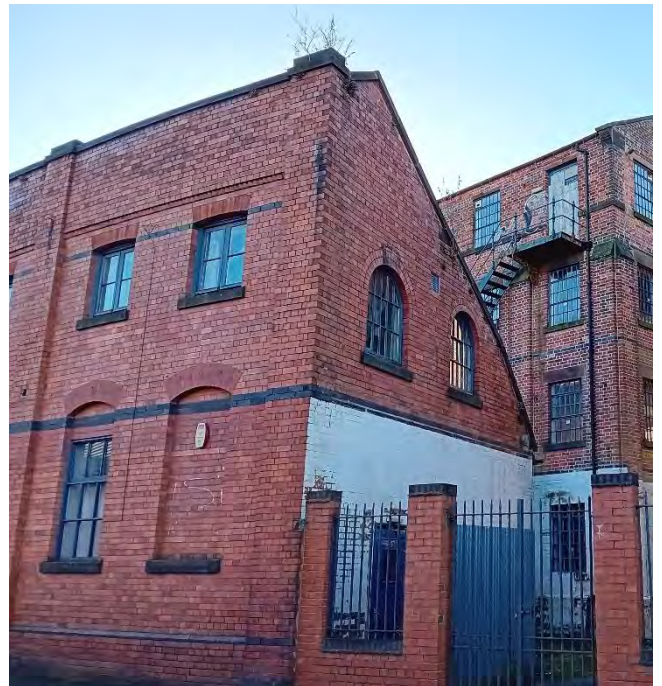


Photo 10: North and east elevation of B2.



Photo 11: East elevation of B2.

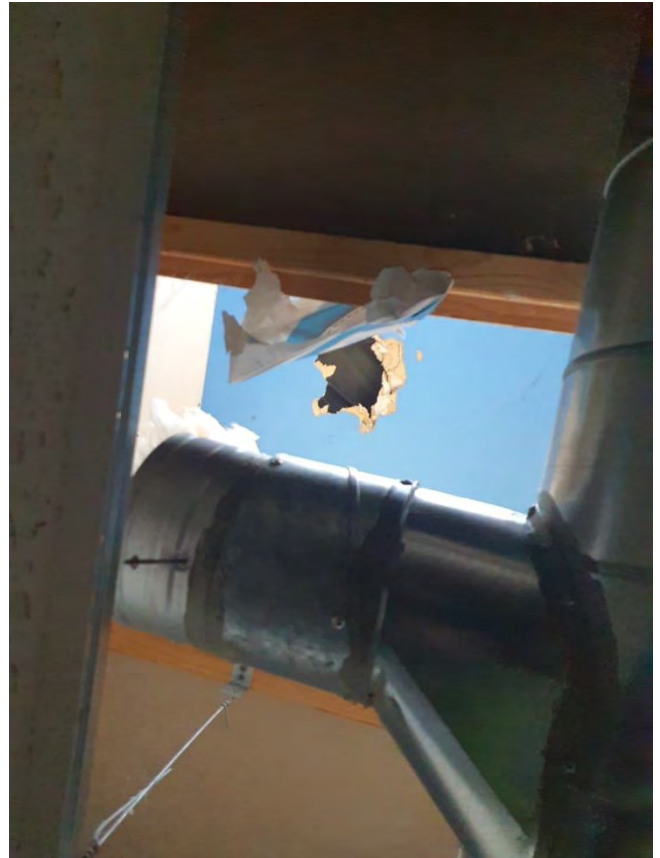


Photo 12: Loft void of B2, seen through the suspended ceiling.



Photo 13: Missing tiles, board, and lifted ridge tiles on the west elevation of B2.



Photo 14: Slipped tiles and lifted ridge tiles on the west elevation of B2.

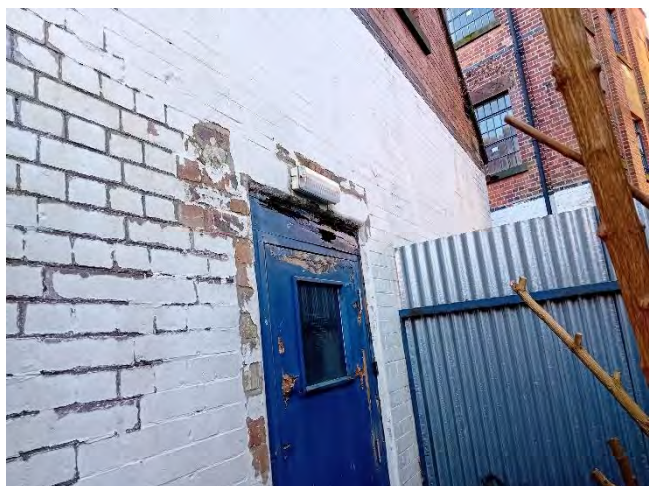


Photo 15: Gap above the door on the north elevation of B2.



Photo 16: South and west elevations of B3.



Photo 17: Sealed surface and Heras fencing in the south of the site.



Photo 18: Urban vacant land with ruderal or ephemeral between buildings B1 and B2.



Photo 19: Urban vacant land with ruderal or ephemeral in the southwest of the site.



Photo 20: Deceased bird present in the insulation in B1.



Photo 21: Pond P1.

Appendix 3: Great Crested Newt Habitat Suitability Index

Pond	HSI Factor										HSI Score	HSI Result
	Geographic Location	Pond Area	Permanence	Water Quality	Shade	Waterfowl	Fish	Pond Count	Terrestrial Habitat	Macrophytes		
P1	1.00	0.92	0.90	0.67	0.70	0.67	0.67	0.43	0.67	0.40	0.68	Average