

Figure 3: Post-Development UKHab Habitat Plan



Table 5-1 Summary of Integrated and Embedded Biodiversity Mitigation and Enhancement Measures

Receptor	Changes and Effects	Integrated/Embedded Measures and Influence on Assessment
Statutory Designated Wildlife Sites: River Itchen SSSI and SAC	Discharge of soil/sediment from construction activities into River Itchen SAC. Accidental pollutants from construction activities into River Itchen SAC. Modification of on-site hydrological regime or change in flood regime resulting in a change in flow characterisation and water quality entering the River Itchen. Change in nitrated and phosphates entering the watercourse.	1. Preparation of a CEMP through Condition to avoid and minimise all potential construction related pollution (water quality) and water quantity effects using best practice tried and tested industry methods (such as the NetRegs Guidance for Pollution Prevention Documents¹ and Ciria Control of water pollution from construction sites. Guidance for consultants and contractors (C532)²) and a monitoring program. Installation of site demarcation fencing to prevent accidental access. 2. Ecological toolbox talk and supervision of certain tasks by Ecological Clerk of Works (ECoW). 3. One Horton Heath does not need to provide mitigation measures beyond the Primary School Drainage and Flood Risk strategy and SUDS discussed in the Surface Water Drainage Strategy Report, One Horton Heath, Primary School, Stantec, May 2026. Southern Water is providing mitigation measures for water abstraction over its entire area. There will be no significant changes to surface water entering the River Itchen as a result of the development proposals at The Primary School and Sports Pitches.
Statutory Designated Wildlife Sites: Solent and Southampton Water Special Protection Area, Solent Maritime SAC	Discharge of soil/sediment from construction activities into River Itchen SAC. Accidental pollutants from construction activities into River Itchen SAC. Modification of on-site hydrological regime or change in flood regime resulting in a change in flow characterisation and water quality entering the River Itchen. Change in nitrated and phosphates entering the watercourse.	Construction Measures: 1 to 3
Hedgerows	Loss of hedgerow habitat.	Construction: Measures 1 and 2

Accidental damage to retained hedgerows on and adjacent to the Site from construction activities including from dust generation, pollution spillages, vehicle movement within root protection zones, rubbish/waste deposition.

Potential for dust and pollutants from the construction phase to settle on vegetation within the treelines and hedgerows, thereby reducing the vigour of plants due to reduced photosynthesis/ smothering which in turn may lead to a reduction in the favourable conservation status of the vegetative designated features of interest associated with the hedgerow habitats.

Fragmentation from creation of footpath and roads through hedgerows.

New hedgerow planting will enhance the hedgerow habitat at the Site with a 111.12% BNG for hedgerow habitats.

4. Installation of site demarcation/tree protection fencing around retained hedgerow and tree habitats in accordance with BS5837:2012 to prevent accidental access and use of signage as necessary.

5. A 10-30m construction buffer around hedgerows/woodland/watercourses.

6. Enhancement of the retained hedgerows through planting along the hedgerow lengths to increase species diversity and plug gaps.

7. Additional planting around footpath that cuts through hedgerow H1.

8. Preparation of a Habitat Management and Monitoring Plan (HMMP) through Condition to introduce a long-term programme of high quality and appropriate management of all retained, enhanced and created habitats to increase habitat diversity, quality and ecological value. All works to be supervised where necessary by a suitably qualified ecologist and carried out by appropriate ecological contractors.

9. Hedgerows will be managed at suitable times of the year (avoiding impacts to roosting bats in trees, nesting birds and dormice) and enhanced through supplementary planting.

10. New hedgerows to be created and existing hedgerows to be enhanced through additional species planting with species beneficial to dormouse to enhanced to be species rich. Trees to be allowed through management avoidance to enhance to hedgerows with trees.

11. Light spill avoidance on hedgerows, watercourses and woodland to <0.5 Lux along a 5-10 m buffer.

Operation:

		12. HMMP will be implemented during operation to manage the retained, enhanced and created habitats within the Site. Habitats will be monitored, and the results will feed into updated HMMP specifications.
Woodland	Accidental damage to woodland adjacent to the Site from construction activities including from dust generation, pollution spillages, vehicle movement within root protection zones, rubbish/waste deposition. Potential for dust and pollutants from the construction phase to settle on vegetation within the woodland, thereby reducing the vigour of plants due to reduced photosynthesis/ smothering which in turn may lead to a reduction in the favourable conservation status of the vegetative designated features of interest associated with the hedgerow habitats. New woodland planting within the Site (0.014 ha) will result in a 0.05 BNG unit increase in woodland habitat at the Site.	Construction: Measures 1, 2, 4, 5, 8 Operation: 12
Watercourse	Modification of on-site hydrological regime or change in flood regime resulting in a change in hydrological regime or change in flood regime of SINC. Change in nitrated and phosphates entering the watercourse. Accidental damage to the watercourse adjacent to the Site from construction activities including from dust generation, pollution spillages, vehicle movement within the riparian zones, rubbish/waste deposition.	Construction: Measures 1 to 4, 5, 8, 11 Operation: 12
Hazel Dormouse	Fragmentation and isolation of dormouse population from creation of footpath and road through hedgerow H1. Harm to dormouse, or their resting place or breeding site from the removal of hedgerows. Increased negative effects from lighting from street lights, external school lights and	Construction: Measures 1, 2, 4 to 11 13. Production of an Ecology Mitigation and Management Plan (EMMP) which will provide non-licensable mitigation strategy for the protection of dormouse and protected and notable species. A phased approach to development co-ordinating all OPP RM applications.

	footpath lighting resulting in habitat loss for dormouse from occupation. Compensation species rich hedgerow to be planted along the southern boundary of the Site which will retain connectivity for dormouse in an east/west direction.	14. One phase directional cut of 5 m section of hedgerow H1 to be removed in autumn or spring or two-phase cut in winter to 0.5 m and completed in spring under supervision of a dormouse licenced ecologist. 15. Enhancement of the habitats within the GI parcels to increase species diversity, vegetation structure and connectivity and remove INNS. This will be included within a GI parcel HMMP and will be of benefit to protected and notable species which are supported at the Site. 16. Creation of a new species rich native hedgerow along the southern boundary of the Site. Operation: Measure 12 17. Monitoring of the wider OPP Site for 10 years post-construction through provision of footprint tunnels or nesting tubes. Overseen by licensed ecologist.
Bats	Loss of foraging and commuting habitat. Loss and interruption of flight lines through loss and fragmentation of H1 by the development. Habitat loss resulting in isolation and fragmentation of foraging and commuting habitats by increase in street lighting, external housing lights and footpath lighting for light sensitive bats and in particular the brown long-eared bat roost at Fir Tree House and barbastelle species. Compensation species rich hedgerow to be planted along the southern boundary of the Site which will retain connectivity for bats in an east/west direction.	Construction: Measures 1, 2, 4 to 11, 13, 15, 16 18. An external lighting assessment has been conducted by RHB Partnership (11 June 2026) which demonstrates that the northern boundary (Ecological Buffer) will have a maximum of 0.018 lux on the horizontal, 0.095 lux on the vertical and the eastern boundary (Bat Commuting Area) will have a maximum of 0.15 lux on the horizontal and 0.005 lux on the vertical. 19. Provision of artificial bat boxes mounted on trees within woodland in the wider OPP to provide additional enhanced roosting habitat to be secured via planning condition. 20. Provision of four built in bat tubes/roof structure crevice features on the club house structure for roosting bats to be secured via planning condition.

		Operation: Measure 12
Common Reptiles and Amphibians	Low populations of slow worm, grass snake and common lizard in wider OPP area. Loss of shelter and foraging habitat from removal of modified grassland. Accidental injury/killing of individuals during vegetation clearance, and the movement of soil.	Construction: Measures 1, 2, 4 to 11 21. A Reptile Method Statement will be produced for the Site and included within the EMMP to outline measures to protect reptiles at the Site with the details of a vegetation manipulation/clearance strategy. 22. One reptile hibernacula, basking areas, habitat piles, and scrapes to be created within suitable boundary habitats or adjoining OPP habitats, locations to be outlined within the Reptile Mitigation Strategy in the EMMP and secured via planning condition. Operation: Measure 12
Breeding Birds	Disturbance, damage or destruction of active nests, birds, young and/or eggs associated with vegetation removal/disturbance. Loss of hedgerows and grassland which provide shelter and foraging habitat for birds.	Construction: Measures 1, 2, 4 to 11 23. Avoidance of potential effects on actively nesting birds, young, eggs and nests through the avoidance of vegetation clearance between March to August inclusive, or through the use of a suitably qualified ecologist who has confirmed no nesting activity present within 48 hours of clearance occurring between March and August inclusive. 24: Bird boxes installed within suitable trees within the wider OPP habitats and will be secured via planning condition. Operation: Measure 12
Hedgehog	Accidental injury/killing though movement of soil, falling in trenches/holes. Loss shelter and foraging habitat from hedgerow and grassland removal. Displacement of hedgehog and population fragmentation from increased lighting. Barriers to dispersal for hedgehog including walls/fencing around gardens and public areas.	Construction: Measures 1, 2, 4 to 11 25. Planks left in construction trenches and holes overnight, or open holes covered. 26. Access holes for hedgehog to be included in all fences and public areas to be secured via planning condition. Operation: Measure 12

Badger	Potential risk of accidental injury/killing through movement of soil, falling in trenches/holes.	Construction: Measures 1, 2, 4 to 11 Operation: Measure 12
Invertebrates	Loss of invertebrate habitat from loss of modified grassland, sparsely vegetated land, other neutral grassland and hedgerow.	Construction: Measure 1, 2, 4 to 11 27. 5No. Invertebrate and bee boxes to be installed within the Site within hedgerows. Dead wood to be retained on Site in suitable locations. 28. Periodic scrapes, soil/gravel mounds and bee banks will be created within the GI parcel grassland habitats. Dead wood piles will be created in GI parcel treelines, woodland and grassland habitats. Operation: Measure 12

6 ASSESSMENT OF EFFECTS AND MITIGATION MEASURES

Based on the assessment methodology set out in Section 3, Table 4-10 presents those receptors that have been identified (through the scoping process) as having the potential to be significantly affected by the proposed development (due to their biodiversity conservation value and/or for which legislation could be contravened). Table 5-1 identifies the potential changes and effects that need to be assessed for each of these receptors.

In broad terms, the changes and effects that may occur as a result of the proposals and which may give rise to significant effects on those ecological receptors scoped into this assessment have been identified as:

- Habitat loss/degradation as a result of construction.
- Pollution incidents occurring during construction including dust generation and accidental spillages (e.g. hydrocarbons).
- Damage/harm to flora and fauna during construction activities from machinery/plant or as a result of unauthorised access into valued areas of habitat to be retained.
- Disturbance (from noise, vibration and visual) to surrounding habitats and associated species during construction.
- Habitat enhancement and creation prior to or during the construction phase.
- Light disturbance on retained and created habitats for nocturnal wildlife during occupation.
- Habitat management and/or monitoring during the occupation phase.

The following sections present the assessment of effects on each of the receptors that have been scoped into this EclA, taking the embedded mitigation measures into account for both the construction and occupation phases of the development. Where significant residual effects remain, Section 8 presents the additional compensation measures (if required) that will be implemented in order to further reduce these residual effects until they are considered to be not significant (or are as low as is reasonably practicable).

6.1 INTER-RELATED EFFECTS

There are two types of inter-related effect:

- Combined effects: when individual effects of the proposed development combine to create a cumulative effect; and
- Interactive effects: consideration of interactions between different effects in relation to a specific receptor.

Combined effects normally occur when different activities associated with a project act upon the same environmental receptor (e.g. the additive effect of physical disturbance from construction activities upon nesting birds may occur at the same time as transport related noise and lighting, that may act upon the same receptor(s) during the construction phase). In determining such effects, consideration would be given to the sensitivity of the receptor and the magnitude of environmental change. This is considered directly within the assessments included in this EclA and, as such, is not reported separately.

Interactive effects are assessed in relation to a specific receptor where the effect could be caused by the interactions of different types of effect from project activities even if individually these are insignificant (e.g. the interaction of noise disturbance on bats).

The assessment of effects on biodiversity receptors has the potential to be exacerbated by climate change, and this has been incorporated into the approach to integrated and embedded mitigation as set out in this EclA.

6.2 ASSESSMENT OF RESIDUAL EFFECTS: RIVER ITCHEN SAC & SSSI

A Surface Water Drainage Strategy Report, One Horton Heath, Primary School, has been produced by Stantec, May 2026 and has informed this assessment.

21. Pollution Incidents to River Itchen SSSI and from Construction

Production and implementation of a detailed Construction Environmental Management Plan (CEMP) (measure 1) for the construction phase, to prevent pollution incidents to the River Itchen SSSI and SAC including (but not limited to):

- Clear construction site demarcation to ensure minimal footprint of temporary/permanent development;
- General best practice pollution prevention and response measures;
- Careful access and construction routing;
- Phasing and timing schedule;
- A comprehensive suite of measures to avoid sediment transport and deposition at source, (e.g. locations of stockpiles away from watercourses; grassing/sheeting of longer-term spoil heaps; methodologies for the transportation of materials and the cleaning of machinery, and control measures for the suppression of construction dust; the installation of temporary SuDS features as appropriate), combined with additional interception measures (e.g. erection of silt barrier fencing, settlement lagoons) and the provision of other control measures e.g. Siltbuster or equivalent to prevent sediment discharge in extreme weather;
- Ecological toolbox talk and supervision of certain tasks by Ecological Clerk of Works (ECoW) (measure 2).
- Suppression of construction dust and litter;
- CEMP management responsibilities, duties, monitoring, reporting etc.

6.3 ASSESSMENT OF RESIDUAL EFFECTS: SOLENT AND SOUTHAMPTON WATER SPA AND SOLENT MARITIME SAC

A Surface Water Drainage Strategy Report, One Horton Heath, Primary School, has been produced by Stantec, May 2026 and has informed this assessment.

22. Pollution Incidents European Sites from Construction

Additional mitigation measures are proposed to deal with any residual, post-avoidance impacts on the integrity of the Solent and Southampton Water SPA and Solent Maritime SAC. The measures relevant to The Primary School Site (measures 1-3) include:

- Construction measures to minimise the likelihood of silt and pollutants reaching the 'main river', e.g. locations of stockpiles away from watercourses, grassing/sheeting of longer-term spoil heaps;
- Professionally designed and extensive SuDS system including permeable surfaces, vegetated swales, and basins to include sediment forebays at the inlets and outlets, and functional wetland vegetation (as required) to promote the deposition of fine sediment and promote settling and binding of sediment in vegetated areas.
- Rigorous programme of water quality monitoring (e.g. turbidity, suspended solids, conductivity, pH, nitrates, phosphates) during construction and operation, at each SuDS and leaving the site, to confirm the efficacy of the system in capturing fine sediment and capturing nitrates in particular. A management intervention mechanism will enable removal of sediment from settlement areas and improvement in the system if required, to ensure no net emissions of fine sediment.

6.4 ASSESSMENT OF RESIDUAL EFFECTS: HEDGEROWS AND WOODLAND

There is one hedgerow (H1) within the Site and four hedgerows (H2, H3, H4, H5) adjacent to Site. Foxholes woodland is located northeast of the Site.

23. Habitat Loss of Hedgerows from Construction

The proposed development will result in the loss of 61 m of the western length of H1 to facilitate a road and parking spaces.

Compensation hedgerow habitat will be planted (measure 16). Mixed scrub, woodland and trees will be planted alongside H4 and will provide additional connectivity for wildlife and will plug any small gaps present within the habitats (measures 7-10).

A Habitat Management and Monitoring Plan (HMMP) will be produced for the Site (measure 12) which will outline the planting schedule and timing/actions/responsibilities for creation of the habitat. Planting works will be timed to avoid disturbance/harm to roosting bats, dormouse reptiles and nesting birds.

New hedgerows will comprise beech *Fagus sylvatica* and are therefore considered to be non-native/ornamental hedgerow under UKHab guidance due to only one native species being present. Hedgerows have an overall net BNG gain however the trading rules are not met due to the loss of species rich native hedgerow (Appendix B BNG Report). The new species rich hedgerow that is to be planted along the southern boundary of the Site cannot be included as enhancement for the Site due to the BNG Additionality Rules. The BNG units can only be used to contribute to a neutral BNG unit total. There is a predicted **negative non-significant effect** as a result of habitat loss of hedgerows within the Site.

24. Damage/Harm to Hedgerows from Construction

There is the potential for accidental damage to the hedgerows and woodland on and adjacent to the boundaries of the Site through compaction of soil around scrub/tree roots to occur as a result of vehicle movements, direct damage from machinery/plant and accumulation of rubbish/waste.

The installation of site demarcation fencing to prevent accidental access will protect the hedgerow/tree/scrub habitat from damage by vehicle movements and plant/machinery, with signage to be used as appropriate. The

implementation of embedded mitigation provided in Table 5.1 will ensure these potential effects are avoided or minimised. The production of a CEMP will minimise the potential construction related effects through the implementation of standard industry working methods. Trees adjacent to the Site will be protected through the use of appropriate root protection fencing. Ecological toolbox talks will be mandatory for all construction personnel, with certain tasks being supervised by an Ecological Clerk of Works (ECoW).

With the mitigation measures including a CEMP in place and regular inspections conducted by an ECoW it is considered that there is a **minor non-significant negative** effect predicted as a result of construction damage/harm incidents to the woodland and retained hedgerow habitat.

25. Pollution Incidents to Hedgerows from Construction

There is the potential for accidental pollution to occur during the construction phase of the proposals through the accidental release of pollutants/silt/soils into the adjoining habitats from a spillage of pollutants such as hydrocarbons from site machinery/vehicles onto soil. This could result in contamination of the soil or siltation of the tree line and hedgerows and as such there is the potential that it could cause damage to vegetation, animals or birds by direct contact with the contaminant (especially fuels), or as a result of contaminants being absorbed through roots, leading to chronic or acute effects.

There is the potential for dust generation as a result of soil movements and construction traffic and dust could become deposited on the hedgerow habitats.

The implementation of embedded mitigation measure 1 (preparation of CEMP) will avoid or minimise potential construction related effects through the implementation of standard industry methods. The establishment of bunded storage compounds for fuels (or self-bunded tanks) and soils located away from hedgerows and treelines will ensure that no accidental discharge will reach the habitats. Mandatory ecological toolbox talks prior to works commencing on Site and the supervision of key tasks with the potential to affect these on-Site habitats by an ECoW (measure 2) will minimise the potential for negative effects to the hedgerow habitats along all boundaries of the Site.

Although the likelihood or frequency of accidental pollution risks are low, a one-off event could be acute to retained hedgerow and woodland habitat. However, with the implemented avoidance measure of locating fuel and soil in a compound at a distance from the retained boundary vegetation and the additional mitigation measures including a CEMP in place and regular inspections conducted by an ECoW it is considered that there is a **minor non-significant negative** effect predicted as a result of construction pollution incidents to the retained hedgerow and woodland habitats.

26. Habitat Management and Monitoring of Hedgerows during Occupation

A Habitat Management and Monitoring Plan (HMMP) will be produced for the Site (measure 12) which will outline the planting schedule and timing/actions/responsibilities for the management and monitoring of the hedgerow habitats. Management works will be timed to avoid disturbance/harm to nesting birds, reptiles and dormouse. Management and monitoring of the hedgerow habitats maintain the 111.12% hedgerow BNG will result in a **minor non-significant positive** effect to the hedgerow habitats within the Site.

6.5 ASSESSMENT OF RESIDUAL EFFECTS: WATERCOURSE

The watercourse runs east to west 12 m north of the Site.

27. Pollution Incidents to Watercourse during Constructions

Mitigation measures are proposed to avoid Pollution Incidents to the watercourse within the Site and measures 1-4 include:

- Construction measures to minimise the likelihood of silt and pollutants reaching the watercourse e.g. locations of stockpiles away from watercourses, grassing/sheeting of longer-term spoil heaps;
- Professionally designed and extensive SuDS system including permeable surfaces, vegetated swales, and basins to include sediment forebays at the inlets and outlets, and functional wetland vegetation (as required) to promote the deposition of fine sediment and promote settling and binding of sediment in vegetated areas.
- Rigorous programme of water quality monitoring (e.g. turbidity, suspended solids, conductivity, pH, nitrates, phosphates) during construction and operation, at each SuDS and leaving the site, to confirm the efficacy of the system in capturing fine sediment and capturing nitrates in particular. A management intervention mechanism will enable removal of sediment from settlement areas and improvement in the system if required, to ensure no net emissions of fine sediment.

28. Damage/Harm to Watercourse from Construction

There is the potential for accidental damage to the watercourse to occur as a result of vehicle movements, direct damage from machinery/plant and accumulation of rubbish/waste.

The installation of site demarcation fencing to prevent accidental access will protect the watercourse habitat from damage by vehicle movements and plant/machinery, with signage to be used as appropriate. The implementation of embedded mitigation measures provided in Table 5.1 will ensure these potential effects are avoided or minimised. The production of a CEMP will minimise the potential construction related effects through the implementation of standard industry working methods. Ecological toolbox talks will be mandatory for all construction personnel, with certain tasks being supervised by an Ecological Clerk of Works (ECoW).

With the mitigation measures including a CEMP in place and regular inspections conducted by an ECoW it is considered that there is a **minor non-significant negative** effect predicted as a result of construction damage/harm incidents to the retained watercourse habitat.

6.6 ASSESSMENT OF RESIDUAL EFFECTS: HAZEL DORMOUSE

Three dormouse nests and one live dormouse were recorded in nest boxes within Foxhole Woods, the woodland adjacent to the northern boundary of the Site. A population of dormouse was recorded in Foxwalks Wood in 2020 and 2025. The presence of dormouse has been recorded in footprint tube surveys conducted in 2025, within Quobleigh Woods and the treeline between The Folds and The Homestall RMAs. The hedgerows within The Primary School and Sports Pitches Site are directly connected to Foxwalks Wood and Quobleigh Wood and as a result dormouse are assumed to be present within suitable hedgerows within and adjacent to the Site.

29. Habitat Loss to Hazel Dormouse from Construction

The proposed development will result in the loss of 61 m area of hedgerow H1 for a road and car parking.

A compensation species-rich hedgerow will be planted along the southern boundary of the site. A diverse range of woody species favoured by dormouse to provide a year-round food source will be included within the planting schedule.

A Phased European Protected Species Licence (EPSL) application to Natural England (NE) for the wider OPP site will be made which will show the overall strategy for dormouse within the OPP site.

A non-licensable Method Statement will be produced for The Primary School and Sports Pitches EMMP, which will tie into the Phased OPP NE EPSL. It is not considered that a mitigation licence for the Primary School and Sports Pitches is proportional to the small loss in hedgerow habitat and the avoidance measures below implemented.

The EMMP will outline mitigation measures for dormouse which will include: Prior to clearance of the 61 m length of hedgerow H1, vegetation will be inspected by a licenced dormouse surveyor (or approved ecologist under the EPS licence). A two-stage process of vegetation removal will be implemented with the vegetation cut back during the winter when dormouse are hibernating (November to March). The lower parts of vegetation will be retained at 0.5 m in height to avoid dormouse hibernation nests that may be present at ground level (measure 14). Care will be taken to ensure that suitable conditions (in terms of temperature and humidity) are maintained at ground level to ensure that any hibernation nests present remain viable. The lower parts and roots of vegetation will then be cleared in the following spring, when dormouse is active.

Should the vegetation be cleared during the Autumn (mid-September to October) or Spring (late April to May) when dormice are active and it is practicable to check the vegetation, then a two-phase cut will not be required and a directional cut under the direct supervision of a licenced dormouse surveyor will be implemented (measure 14). The surveyor will need to inspect the vegetation for summer nests immediately prior to the vegetation being removed. Clearance of suitable habitat will be phased so as to limit potential impacts to this species.

Additional scrub and tree planting will be included around the section of hedgerow H1 to be removed to facilitate the road to strengthen connectivity as much as possible around the break. Connectivity will be retained and enhanced through the planting of a species rich hedgerow along the southern boundary of the Site (measure 16). The retained hedgerows will be enhanced to increase species diversity and plug gaps. The woodland, scrub and hedgerow habitat within the GI parcels will be additionally enhanced to support dormouse.

With the embedded measures to ensure the strengthening of the retained hedgerows, additional planting around breaks in hedgerow H1, enhancement and creation of on Site and GI dormouse habitat and supervision conducted by a dormouse licenced ECoW it is considered that there is a **minor non-significant negative** effect predicted as a result of habitat loss for dormouse.

30. Harm to Hazel Dormouse from Construction

There is the potential for harm to dormouse inhabiting the retained hedgerows located within the Site as a result of injury/mortality from the movement of machinery/plant.

The installation of Site demarcation fencing to prevent accidental access will protect dormouse using hedgerow habitat from harm caused by plant/machinery movements, with signage to be used as appropriate. The implementation of embedded mitigation measures provided in Table 5.1 will ensure these potential effects are avoided or minimised. The production of a CEMP will minimise the potential construction related effects through the implementation of standard industry working methods. The hedgerows will be protected through the use of appropriate root protection fencing. Ecological toolbox talks will be mandatory for all construction personnel, with

certain tasks relevant to dormouse being supervised by an experienced and licenced Ecological Clerk of Works (ECoW).

With the mitigation measures including a CEMP in place and regular inspections conducted by a dormouse licenced ECoW it is considered that there is a **minor non-significant negative** effect predicted as a result of construction harm to dormouse.

31. Disturbance to Hazel Dormouse (from Noise and Vibration) from Construction

Disturbance to dormouse may occur as a result of noise and vibration from the construction works at the Site. Dormouse can become acclimatised to regular low levels of noise disturbance and are more affected by irregular and loud noise. The dormouse population that likely inhabit the hedgerows at the Site may become temporarily displaced by the construction works to retained suitable habitats outside of the Site boundary including Foxholes Woods, hedgerows off site and Quobleigh Woods.

An EMMP will be produced which will outline the measures within the phased OPP NE licence that will take account of the timing of each phase of the OPP development. Works in certain areas of the RMA parcels will be carefully timed so that effects of noise on dormouse are minimized throughout the phasing of the development construction works.

With a phased approach implemented for the construction works avoiding significant construction works being located in proximity to both the eastern and western boundaries of the Site at the same time, and timing of the construction works in phases within the wider OPP site works, there is a predicted **minor non-significant negative** effect to dormouse as a result of construction noise and vibration disturbance.

32. Disturbance to Hazel Dormouse (from Light Pollution) during Occupation

Hazel dormice are nocturnal and as a result an increase in light spill onto boundary hedgerows could negatively affect the species and deter them from using the linear habitats along the Site boundaries.

A lighting strategy will be produced for the Site which will minimise levels of lighting and use uni-directional lights, PIR timers, cowls etc to reduce light spill onto the hedgerow habitats within the Site to a minimum. The lighting strategy will need to demonstrate that the development meets lux levels to <0.5 Lux along a minimum 5 – 10 m buffer along the linear habitats along the boundaries.

The implementation of a carefully planned and implemented lighting strategy with lighting specifications, supported by a thorough lighting assessment will ensure that light spill onto the eastern and western linear boundary habitats is avoided or minimised. There is a predicted **minor non-significant negative** effect to dormouse as a result of operational light disturbance once The Primary School and Sports Pitches development is occupied.

33. Habitat Management and Monitoring for Hazel Dormouse during Occupation

The on-going management of the hedgerows and created scrub in accordance with the proposed HMMP by Condition (measure 12), in addition to the GI parcels within the wider OPP site will result in maintaining the habitats and connectivity in a favourable condition to support dormouse at the Site.

As part of the NE Mitigation Licence that will be required for the OPP OHH Site, the dormouse population will be monitored. The Site will be monitored from the commencement of the construction work for ten years (measure 17).

Dormouse boxes will be installed in site-wide woodland area as per the methodology provided by the Peoples Trust for Endangered Species (PTES) within the Guidelines will be installed for this purpose. Dormouse nest boxes will be installed high in trees (to avoid disturbance by the public and cats) using ladders which will be monitored twice per year in May/June and September/October for ten years.

The monitoring will commence in 2026 prior to the commencement of construction works in order to provide a baseline set of data. Should the monitoring show a decrease in the breeding population, this will trigger additional on-site habitat management and/or off-site compensation that may be required to stabilise the population. The monitoring will result in a **minor positive non-significant** effect to dormouse as a result of management and monitoring during operation.

6.7 ASSESSMENT OF RESIDUAL EFFECTS: BATS

The Site has a high suitability for foraging and commuting bats. Multiple off-site trees had a PRF, including two trees subject to climbing surveys with PRF-M. Static, radio tracking and trapping surveys conducted in 2020 by Johns Associates Ltd and updated static surveys conducted on The Folds, The Holme, The Homestal and The Upper Acre RMA Sites in 2025, have been used to inform this assessment.

1.1.1 Habitat Loss to Bats from Construction

The proposed development will result in the loss of approximately 61 m of hedgerow H1 for a road and car parking. Compensation species rich hedgerow habitat will be planted along the southern boundary of the Site. The retained hedgerows will be enhanced which will provide additional connectivity for foraging and commuting bats and will plug any small gaps present within the habitats. A diverse range of woody species to increase invertebrate prey for foraging bats will be included within the planting schedule.

Additional scrub and tree planting will be included around the section of hedgerow to be removed to facilitate the footpath through H1 to strengthen connectivity as much as possible around the break. A foraging and commuting buffer has been incorporated along the east of the site which will include the creation of scrub and integration of suitable planting or invertebrate prey species. The woodland, scrub and hedgerow habitat within the GI parcels will be additionally enhanced to support bats including increasing species diversity, plugging gaps and increasing structural diversity.

The installation of site demarcation fencing to prevent accidental access will protect the tree from damage by vehicle movements and plant/machinery, with signage to be used as appropriate. The implementation of embedded mitigation measures provided in Table 5-1 will ensure these potential effects are avoided or minimised. The production of a CEMP will minimise the potential construction related effects through the implementation of standard industry working methods. Trees adjacent to the Site will be protected through the use of appropriate root protection fencing. Ecological toolbox talks will be mandatory for all construction personnel.

Provision of site-wide artificial bat boxes will be mounted on retained mature trees within woodland in the wider OPP via planning condition, to provide additional enhanced roosting habitat. Crevice features will be provided in a SW aspect of suitable school buildings that border the boundary habitats at the Site, comprising either a gaps in mortar, under tiles on roofs or through a specific integrated bat roosting feature to enhance the Site for light tolerant bat species.

The grassland, SUDs ponds, woodland, scrub, other neutral grassland and hedgerow habitat within the GI parcels will be additionally enhanced to provide ongoing foraging and commuting habitat for bats.

With the implemented strengthening of the retained hedgerows, additional planting around the break in hedgerow H1 and other measures to be implemented within the GI parcels it is considered that there will be a **minor non-significant negative** effect predicted as a result of habitat loss for bats.

34. Harm to Bats from Construction

The installation of site demarcation fencing to prevent accidental access will protect trees with suitability for roosting bats from harm by plant/machinery, with signage to be used as appropriate. The implementation of embedded mitigation measures provided in Table 5.1 will ensure that these potential effects are avoided or minimised. The production of a CEMP will minimise the potential for construction related effects to occur through the implementation of standard industry working methods. Trees adjacent to the Site will be protected through the use of appropriate root protection fencing. Ecological toolbox talks will be mandatory for all construction personnel.

With the mitigation measures including a CEMP in place and regular inspections conducted by an ECoW it is considered that there is a **minor non-significant negative** effect predicted as a result of construction harm to roosting bats.

35. Disturbance to Bats (from Light Pollution) during Occupation

Bats are nocturnal and as a result an increase in light spill onto boundary hedgerows could negatively affect the foraging and commuting behaviour of bats and could affect tree roosts deterring bats from using the linear habitats along the southern, western and eastern boundaries respectively, which could result in the loss of entire hedgerows for bats.

An external lighting strategy has been produced for the Site by RHB Partnership (11 June 2026) which demonstrates levels of lighting and used uni-directional lights, PIR timers, cowls etc. to reduce light spill to the hedgerow habitats within the Site to a minimum. The northern boundary (Ecological Buffer) will have a maximum of 0.018 lux on the horizontal, 0.095 lux on the vertical and the eastern boundary (Bat Commuting Area) will have a maximum of 0.15 lux on the horizontal and 0.005 lux on the vertical.

The implementation of the carefully planned lighting strategy with lighting specifications, supported by the lighting assessment demonstrates that light spill will be avoided on the linear boundary habitats along the northern boundary of the Site with trees with high suitability for roosting bats and/or maternity roosts and along the eastern boundary of the Site which will be retained as a bat commuting route. There is a predicted **minor non-significant negative** effect to bats as a result of light disturbance during occupation of the school and sports pitches.

36. Habitat Management and Monitoring for Bats during Occupation

The on-going management of the other neutral grassland, SUDs ponds, mixed scrub and hedgerows in accordance with the proposed HMMP by Condition (measure 12), in addition to the GI parcels within the wider OPP site (measure 17) will ensure that the habitats and their connectivity is maintained in a favourable condition to support bats at the Site.

It is considered that there is a **minor non-significant positive effect** to bats predicted as a result of habitat management during operation within the Site.

6.8 ASSESSMENT OF RESIDUAL EFFECTS: REPTILES AND AMPHIBIANS

A low population of slow worm inhabit the Site. Low populations of common lizard and grass snake have been recorded in the wider OPP OHH site.

1.1.1 Habitat Loss to Reptiles and Amphibians from Construction

To compensate for the habitat loss within the Site, two reptile hibernacula will be created within suitable boundary habitats or adjoining OPP habitats, at locations to be outlined within the Reptile Mitigation Strategy within the EMMP. Basking areas and habitat piles will be created around the boundary habitats. Other neutral grassland will be created around the perimeter of the Site which will provide foraging habitat and connectivity. The GI parcels at the Site will provide enhanced reptile habitat for hibernation, shelter and foraging including woodland, SUDs ponds, other neutral grassland and mixed scrub.

It is considered that there is a **minor non-significant negative** as a result of habitat loss for reptiles.

37. Harm to Reptiles and Amphibians from Construction

A Reptile Method Statement will be produced for the Site within the EMMP to outline measures to protect reptiles at the Site and the details of a vegetation manipulation/clearance programme to avoid harm to reptiles.

The majority of the Site boundaries will be protected and retained during the construction works. All contractors will receive a site-specific reptile awareness Toolbox Talk (measure 2) prior to works commencing, covering identification, legal protection, and procedures to follow if reptiles are encountered.

Vegetation including hedgerow and other neutral grassland will be removed: this will be conducted when reptiles are active (April to mid-October) and will be cleared in two stages using the following approach:

- Phased vegetation clearance and hand search approach.
- First Cut: Reduce vegetation to approximately 15 cm in height, working systematically towards retained habitat or the receptor area, encouraging reptiles to move away.
- Second Cut: Reduce vegetation to ground level (≤ 5 cm) after an interval of at least 48 hours.
- Any reptiles captured during the works will be moved to the retained and protected habitat along the boundary habitats.
- Clearance will take place in suitable weather conditions (dry, mild, overcast, and outside extreme heat or cold).

An ECoW will be present during all clearance of suitable habitat to carry out fingertip searches, ensure reptiles are moved safely, and to stop works if reptiles are encountered in significant numbers.

It is considered that there is a **minor non-significant negative** as a result of harm to reptiles.

38. Habitat Management to Reptiles and Amphibians during Occupation

The on-going management of the other neutral grassland, scrub and hedgerows in accordance with the proposed HMMP by Condition (measure 12), in addition to the GI parcels within the wider OPP site (measure 17) will result in maintaining the habitats in a favourable condition to support reptile species. By implementing the above measures, impacts to slow worm will be minimised, legal compliance will be ensured, and the ecological value of the Site and immediately adjacent areas for reptiles will be maintained in the long term.

It is considered that there is a **minor non-significant positive** effect predicted as a result of habitat management from operation to reptiles within the Site.

6.9 ASSESSMENT OF RESIDUAL EFFECTS: BREEDING BIRDS

There were 25 bird species recorded within the OPP boundary during surveys conducted by Johns Associates in 2020, including six notable/protected species. Consideration of how construction of the development proposals could affect breeding birds is set out below.

39. Habitat Loss for Breeding Birds from Construction

The proposed development will result in the loss of approximately 61 m of hedgerow and modified grassland habitat within the Site which support populations of breeding birds.

There is the potential for accidental damage to the retained hedgerows through compaction of soil around scrub/tree roots to occur as a result of vehicle movements, direct damage from machinery/plant and accumulation of rubbish/waste.

The installation of site demarcation fencing to prevent accidental access will protect the hedgerow habitat from damage by vehicle movements and plant/machinery, with signage to be used as appropriate. The implementation of embedded mitigation measures provided in Table 5.1 will ensure these potential effects are avoided or minimised. The production of a CEMP will minimise the potential construction related effects through the implementation of standard industry working methods. Trees adjacent to the Site will be protected through the use of appropriate root protection fencing. Ecological toolbox talks will be mandatory for all construction personnel, with certain tasks being supervised by an Ecological Clerk of Works (ECOW).

Areas of other neutral grassland habitat, mixed scrub and a species rich hedgerow habitat will be provided within the Site. The compensation habitat will maintain some nesting, shelter and foraging habitat for breeding birds. Suitable school buildings will have a built-in bird nesting feature. The GI parcels at the Site will provide enhanced woodland, other neutral grassland, SUDs ponds and mixed scrub providing additional habitat for nesting, shelter and foraging.

It is considered that there is a **minor non-significant negative** effect predicted as a result of a loss of foraging, shelter and breeding habitat for breeding birds as a result of construction within the Site.

40. Harm to Breeding Birds from Construction

Construction phase impacts on birds relate to the potential disturbance to foraging and active nests and breeding birds/eggs and young. A 61 m section of hedgerow H1 will be removed as part of the proposals. The implementation

of mitigation measures 4 and 5 will avoid or minimise potential effects to breeding birds during the construction phase of the proposed development.

The production and implementation of a CEMP (mitigation measure 1) will minimise potential construction related effects through the use of standard industry working methods. Potential effects to birds, their nests, eggs and/or young will be avoided through the implementation of mitigation measure 22. Vegetation clearance will occur outside the bird nesting season, (March to August inclusive). Where this is not possible, a suitably qualified ecologist will confirm no nesting activity is present within 48 hours of clearance by undertaking a careful search of the area of vegetation to be removed.

With the mitigation measures including a CEMP in place and regular inspections conducted by an ECoW it is considered that there will be a **minor non-significant negative** effect predicted as a result of construction damage/harm incidents to breeding birds within the Site.

41. Disturbance to Breeding Birds (from Noise and Vibration) from Construction

Disturbance to breeding birds may occur as a result of noise and vibration from the construction works at the Site. Birds can become acclimatised to regular low levels of noise disturbance and are more affected by irregular and loud noise/vibration. Breeding birds at the Site may become temporarily displaced by the construction works to retained habitats outside of the Site including within Quobleigh Woods and Foxholes Woods.

An EMMP will be produced to outline the timing of each phase of the OPP development and will aim to time works in certain areas of the RM parcels carefully so that areas of undisturbed habitat remains present throughout the phased development construction works. This strategy will also apply to the linear protected and retained habitats bordering the Site.

With a phased approach implemented for the construction works avoiding significant construction works being located in proximity to more than one Site boundary at the same time, there is a predicted **minor non-significant negative** effect to breeding birds as a result of construction noise and vibration disturbance.

42. Habitat Management to Breeding Birds during Occupation

The on-going management of the on-site other neutral grassland, SUDs, mixed scrub, hedgerow and individual tree habitats and the GI habitats including other neutral grassland, mixed scrub, SUDs and woodland in accordance with the HMMPs by Condition, will result in maintaining the available habitats in a favourable condition for breeding bird species, however the proposed new development will create an increase in disturbance to the nesting habitat within the Site. It is considered that there is a **minor non-significant positive** effect predicted as a result of habitat management during occupation to breeding birds within the Site.

6.10 ASSESSMENT OF RESIDUAL EFFECTS: HEDGEHOG

Hedgehogs are likely to be present within the boundary habitats at the Site and may forage within the grassland areas.

1.1.1 Habitat Loss for Hedgehog from Construction

The proposed development will result in the loss of a 5 m section of hedgerow and grassland habitat within the Site which is likely to support hedgehog.

Provision of compensation shelter and foraging habitat, including other neutral grassland, a species rich hedgerow and mixed scrub habitat will be created which will provide suitable compensation hedgehog habitat following the construction works. The GI parcels at the Site will provide enhanced woodland, other neutral grassland, SUDs ponds and mixed scrub habitat for shelter and foraging.

Hedgehog access holes will be installed into closed panel fences and brick walls to allow hedgehogs to access garden and public areas.

It is considered that there is a **minor non-significant negative** effect predicted as a result of a loss of foraging and shelter habitat for hedgehog from construction within the Site.

43. Harm to Hedgehog from Construction

There is the potential for accidental damage to retained hedgerow habitat to occur as a result of construction activities including vehicle movements within root protection zones and direct damage from machinery/plant which could harm/kill hedgehog. There is also a potential risk of accidental injury/killing hedgehog through soil movement and vegetation clearance. The implementation of embedded mitigation measures 1, 2, 4 and 5 will ensure these potential effects are avoided or minimised.

The production of a CEMP (measure 1) will minimise the potential construction related effects through the implementation of standard industry working methods. Ecological toolbox talks will be mandatory for all construction personnel, with certain tasks being supervised by an ECoW (measure 2). The installation of Site demarcation fencing to prevent accidental access will protect boundary habitats from damage by vehicle movements and plant/machinery, with signage to be used as appropriate (measures 4 and 5). Access planks will be provided within open trenches and holes overnight to allow for hedgehog to escape should they fall in overnight (measure 24 and 25).

A Method Statement for reptiles within the EMMP will also protect hedgehog during pre-commencement works and the construction phase of the development. A phased directional reduction in vegetation height and extent (first cut to 15cm and then to ground level), will be implemented with arisings being removed from Site and not left in compost piles. Grassland will be maintained with a short sward height until construction works commence. A precautionary hand search followed by destructive search will be completed prior to the installation works commencing. The working area will be maintained in a condition unsuitable for hedgehog during all construction works (including introduction of potential refugia by construction materials).

With the mitigation measures including a CEMP in place and regular inspections conducted by an ECoW it is considered that there is a **minor non-significant negative** effect predicted as a result of construction damage/harm incidents to hedgehog within the Site.

6.11 ASSESSMENT OF RESIDUAL EFFECTS: INVERTEBRATES

Potential effects associated with the proposed development on the invertebrate assemblage could occur as a result of the development.

1.1.1 Habitat Loss for Invertebrates from Construction

The proposed development will result in the loss of 5 m hedgerow, other neutral and modified grassland at the Site which has suitability to support a range of invertebrates. Nine species of butterfly were recorded within the Site.

On-Site the development includes creation of other neutral grassland, SUDs, mixed scrub and a hedgerow. Mitigation measure 26 includes 5No. invertebrate boxes to be installed within the perimeter vegetation of the Site and dead wood piles will be created in the boundary habitats.

Within the GI parcels periodic scrapes will be created within the grassland to allow the maintenance of bare ground and early-successional stage vegetation, extending its value to invertebrates in the longer term. Bee banks will be created for many thermophilic ground-nesting invertebrate species including solitary bees, solitary wasps, beetles and spiders and are best created in open, south-facing situations. Compacted soil and gravel will be shaped into a mound with various slopes, hollows and angles that may be utilised and favoured by different species. Vertical or very steep banks often take much longer to vegetate due to the greater heat stress they experience and may require less maintenance. Dead wood piles will be created in treelines, woodland and grassland areas.

With the mitigation measures above implemented, it is considered that there is a **minor non-significant negative** effect predicted as a result of a loss of habitat for invertebrates from construction within the Site.

44. Damage/Harm to Invertebrates from Construction

There is the potential for accidental damage to retained grassland and hedgerow habitat to occur as a result of construction activities including vehicle movements within root protection zones and direct damage from machinery/plant which could cause a further loss in invertebrate habitat and a loss in species diversity of invertebrates. The implementation of embedded mitigation measures 1, 2, 4 and 5 will ensure these potential effects are avoided or minimised.

The production of a CEMP (measure 1) will minimise the potential construction related effects through the implementation of standard industry working methods. The installation of Site demarcation fencing to prevent accidental access will protect boundary habitats from damage by vehicle movements and plant/machinery, with signage to be used as appropriate. Ecological toolbox talks will be mandatory for all construction personnel, with certain tasks being supervised by an ECoW (measure 2).

With the mitigation measures including a CEMP in place and regular inspections conducted by an ECoW it is considered that there is a **minor non-significant negative** effect predicted as a result of construction damage/harm incidents to invertebrate habitats within the Site.

45. Habitat Management for Invertebrates during Occupation

There is the potential for on-Site habitats which support invertebrates to become degraded over time through a lack of appropriate management. The production and implementation of a HMMP (measure 12) will introduce a long-term programme of appropriate management of all retained, enhanced and newly-created habitats and habitat features within the Site, and within the GI parcels which will increase their ecological quality and function. All works will be supervised where necessary by a suitably qualified ecologist and carried out by appropriate ecological contractors.

It is considered that there is a **minor non-significant positive** effect predicted as a result of habitat management and enhancement for invertebrate species from operation within the Site.

6.12 CLIMATE CHANGE

Greenhouse gas (GHG) emissions contribute to climate change, which could affect the designated features of local sites, habitats and species considered in this EclA. For example: climate change may lead to grassland management changes resulting in the loss of foraging habitat for bats and/or badgers. Climate change may also lead to, for example, changes in the distribution of bats due to other areas within the UK and abroad becoming more suitable for the species, leading to decline in local populations.

The Climate Change Adaptation Manual – Evidence to Support Nature Conservation in a Changing Climate produced by Natural England (2020) supports practical and pragmatic decision making and guides reasonable judgement on the potential effects of climate change on the key habitats associated with the application site. The habitats that characterise the application site: for example, amenity grassland, woodland and hedgerows are of low relative vulnerability to climate change.

Climate change and its implications for biodiversity has been incorporated into the design of embedded ecological mitigation and enhancement habitats to reduce the risk of impact on legally protected and other species. Selection of measures that are based on habitats that are known to be more resilient to climate change and provide extended ecological functionality for a wide range of species have been selected.

This has largely been achieved through the creation of additional areas of replacement habitat that are considered to have a low level of sensitivity to climate change (subject to appropriate management). These measures are associated with the provision of hedgerow planting, enhancement of existing hedgerows, areas of other neutral grassland, and a SUDs pond which will be managed and enhanced with an objective to support native wildlife. A Habitat Management and Monitoring Plan (HMMP) will be produced to guide appropriate long-term care of these and existing habitats.

As a result, no further biodiversity mitigation for climate change as part of the proposed development is required beyond that included in the embedded mitigation and enhancements set out above, including management and monitoring beyond that identified. It is considered that the proposed development will be of benefit to biodiversity in providing a significant area of land that will be ecologically improved which will be of benefit at a local and regional strategic landscape scale.

7 CUMULATIVE EFFECTS

The Primary School and Sports Pitches RM Site has been assessed in combination with other RM OPP development parcels at the Site and the cumulative effects of the developments through both the construction and occupation phases are significant when considered in combination.

The OPP GI parcels are unlikely to be of sufficient size to accommodate the full loss of habitats within the OHH OPP development area and further habitats outside of the OPP boundary will be required for inclusion within the GI parcels. It is likely that a wider off-site area of Quobleigh Woods and Ponds SINC will be required to be included in addition to further off-site parcels of land within the ownership of EBC.

8 COMPENSATION

No further compensation is required for the proposed development.

9 ENHANCEMENT

Enhancement of the Site will include:

- Woodland and scrub planting to the east of the site to maintain and enhance a green corridor
- Species rich meadow mixes planting along the southern boundary.
- Trees planting across site
- Wildlife/SUDs pond created.
- Species rich hedgerow planting
- Ornamental hedgerow planting (beech hedgerows).

The BNG has calculated a significant enhancement of 19.71% Habitat BNG (2.35 habitat units) and a 111.12% Hedgerow BNG (2.51 hedgerow units).

An HMMP and an EMMP will be produced through planning condition which will outline habitat enhancement measures and protected species enhancement measures for both the Site and GI parcels within the OPP.

10 MONITORING

Table 10-1 summarises the ecological/environmental measures embedded within the proposed development and the means by which they will be implemented, i.e. they will be secured through planning conditions.

Table 10-1 Summary of Environmental Measures to be Implemented

Environmental measure	Responsibility for implementation	Compliance mechanism
Production and implementation of a Construction Ecological Management Plan (CEMP)	Developer/Contractor/Project Ecologist	Planning condition
Production of an Ecological Mitigation and Management Plan (EMMP) to include dormouse, reptile and bat monitoring plan.	Developer/Contractor/Project Ecologist	Planning Application
Production and implementation of a Habitat Management and Management Plan (HMMP) for Site.	Developer/Project Ecologist	Planning condition
Ecological tool box talk and register of attendance for all persons working within the construction area	Developer/Contractor/Project Ecologist	Planning condition
Suitably Qualified Ecologist/Ecological Clerk of Works/Ecological Contractors to manage, monitor and implement all ecological aspects of the development.	Developer/Contractor/Project Ecologist	Planning condition
Retention and protection of all habitats and trees (apart from those specifically identified as being removed through the development) with suitable offsets and barriers	Developer/Contractor/Project Ecologist	Planning condition
Use of dust suppression techniques	Developer/Contractor	Planning condition
Use of pollution control and response methods during construction and operation	Developer/Contractor/Operator	Planning condition
Implementation of all on site landscape/habitat measures in accordance with CEMP/HMMP and the Integrated/Embedded Mitigation and Enhancement Plan submitted with the Planning Application.	Developer/Project Ecologist/ Contractor/Operator	Planning Condition
Implementation of a programme of robust ecological monitoring, reporting and intervention to ensure all integrated and embedded mitigation and enhancement measures are successful in the short and long term.	Operator/Project Ecologist	Planning condition

Periodic UKHab condition assessment surveys to monitor and inform the successful delivery and management of the habitat creation and Biodiversity Net Gain will be undertaken following completion of the proposed works in years 1, 3, 5, 10, 15, 20, 25 and 30.

Habitat areas and conditions will be monitored during the site visits and prescriptions for amendments to management of the site will be provided to EBC to maximise the ecological benefits of ecological management actions for habitats at the Site and the fauna that they may support.

11 CONCLUSIONS

Considering the detailed ecological baseline, the integrated and embedded ecological mitigation and enhancement measures and the assessment of likely significant effects as set out in Section 6 of this EclA; it is considered reasonable to conclude that no negative significant residual effects will occur to important biodiversity receptors, including legally protected species and designated sites, from either the construction or occupation phases of the proposed development.

There will be a cumulative effect with the other RM applications within the OPP OHH Outline application area. This has been considered through a strategic approach to mitigation and compensation measures for the proposed OPP application, with a Strategic EMMP in place. A phased dormouse licence application will be submitted for the OPP site which may include the proposed hedgerow removal at the Primary School and Sports Pitches Site.

Use of the Statutory Biodiversity Metric has demonstrated that the proposals will deliver a **19.71%** Biodiversity Net Gain in Habitats and a **111.12%** BNG in Hedgerow habitats. The Trading Rules are met. The BNG for this application will be input into an overall OPP BNG Tracker document which will offset the losses in BNG within other development parcels with BNG from enhancement of parcels with a positive BNG and within the wider OPP.

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APPENDIX A GROUND LEVEL TREE ASSESSMENT FOR BATS

PETER MARSH CONSULTING LTD

Primary School, One Horton Heath (OHH) GLTA & Tree Climbing Survey Technical Note

1 INTRODUCTION

1.1 BACKGROUND

Johns Associates Ltd undertook a Ground Level Tree Assessment (GLTA) for roosting bat assessment at the proposed Primary School and Sports Facilities development parcel, to inform of a Reserved Matters (RM) planning application for the site. The development is included within an Outline Planning Permission (OPP) for the wider OHH OPP (O/20/89498).

The land associated with the development is hereafter referred to as 'the Site'. The Site has the postcode SO50 7DF and the central grid reference is SU 49117 16956. A plan showing the Site location, context and red line boundary is provided in Figure 1.

The OPP Site was determined to be of high value to bats during surveys conducted at the Site including GLTA, habitat assessment, radio tracking and trapping surveys from bats conducted as part of the OHH OPP in 2020. Surveys were required to determine presence/likely absence of roosting bats to inform the planning applications and masterplan for the Site.

1.2 PURPOSE OF THE SURVEY AND REPORT

The purpose of the survey and subsequent reporting is to:

- Undertake a GLTA to inform the requirement for climbing surveys within the Site (as shown in Figure 1).
- To identify evidence of roost presence/suitability and map the locations.
- Present the results of the GLTA.
- Present the results of aerial tree climbing survey on some trees adjacent to the site boundary.
- Provide specifications for avoidance, mitigation, compensation and enhancement measures to protect roosting bats and their habitat from harm during construction and operation of the development.

1.3 PERSONNEL

The production of this Technical Note was undertaken by Ellie Brine BSc (Hons) ACIEEM, a Consultant Ecologist at Johns Associates who has both worked and studied within the Environmental Sector since 2015. Ellie holds a First-Class degree

in Wildlife Ecology and Conservation Science, is an Associate Member of the Chartered Institute of Ecology and Environmental Management (ACIEEM) and is proficient in botanical identification, holding a FISC Level 4.

The survey work and review of this document was undertaken by Tessa Pepler BSc (Hons) MSc MCIEEM, a Principal Ecologist and Ecology Team Leader at Johns Associates who has worked as an ecological consultant since 2005. Tessa has a BSc (Hons) in Environmental Studies and an MSc in Ecology and Management of the Natural Environment. Tessa is a full member of the Chartered Institute of Ecology and Environmental Management (MCIEEM) and holds a Natural England Class 1 survey licence for bats (2019-40584-CLS-CLS-1), great crested newt *Triturus cristatus* (2015-18828-CLS-CLS), and hazel dormouse *Muscardinus avellanarius* (2016-20745-CLS-CLS). Tessa is proficient in botanical identification and is certified FISC Level 3.

1.4 SITE DESCRIPTION AND LOCATION

The Site is located to the west of the village of Horton Heath in Hampshire and measures approximately 4 ha. Fir Tree Lane is located to the north of the Site. An area of woodland is located to the northeast and a watercourse runs east to west to the north. Residential dwellings are located to the east, while a solar farm is located to the west. The wider landscape consists of a matrix of agricultural fields, hedgerows, woodland patches, bodies of water and urban settlements. A plan showing the location and context of the Site is provided as Figure 1.

Figure 1: Site Location and Red Line Boundary



2 LEGAL PROTECTION OF BATS

In England and Wales, all bat species and their roosts are legally protected under the European Habitats Directive (1992), (which was transposed into UK law as the Conservation of Habitats & Species (Amendment) (EU Exit) Regulations 2019; the Wildlife & Countryside Act 1981 (as amended); the Countryside & Rights of Way (CROW) Act 2000; and the Natural Environment and Rural Communities (NERC) Act 2006.

Barbastelle, Bechstein's (*Myotis bechsteinii*), greater horseshoe (*Rhinolophus ferrumequinum*), lesser horseshoe, brown long-eared, soprano pipistrelle (*Pipistrellus pygmaeus*), and noctule (*Nyctalus noctula*) bats are all listed as Species of Principal Importance in England under Section 41 of the Natural Environment and Rural Communities Act 2006.

It is a legal offence to:

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

The government's statutory conservation advisory organisation in England (Natural England) is the body responsible for administering protected species licenses that permit activities that would otherwise result in an offence being committed.

There are currently a number of licensing options available, depending on the size and nature of the roost(s) present and the species using them.

A licence can be obtained if the following three tests have been met:

- Regulation 53(9)(a) - there is "no satisfactory alternative" to the derogation, and
- Regulation 53(9)(b) - the derogation "will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range" and
- Regulation 53(2)(e) - the derogation is for the purposes of "preserving public health or public safety or other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment."

2.1 NATIONAL PLANNING POLICY

There are numerous national and local planning policies associated with flora and fauna (also referred to as biodiversity) that need to be addressed as part of the planning process. The Government has issued its National Planning Policy Framework (NPPF) December 2024 (updated in February 2025), which requires impacts to biodiversity to be minimised. Paragraph 194 of the NPPF applies the same protection to Ramsar sites as that conferred by the Habitats Regulations to SACs and SPAs, it also applies the same protection to sites identified or required as compensatory measures for adverse effects on habitat sites.

To protect and enhance biodiversity plans should:

- 192a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation;
- 192b) 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.

The NPPF requires development to apply the following principles (Paragraph 193):

- a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
- c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
- d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

Planning authorities should follow key principles to ensure that the potential impacts of planning decisions on biodiversity conservation are considered. Circular 06/05: Biodiversity and Geological Conservation provides guidance on the application of the law relating to planning and nature conservation and complements the NPPF.

3 HABITAT SUITABILITY

The Site was assessed to determine its importance within the wider local context, particularly with reference to the location of known roosts obtained through the EclA Desk Study and from previous bat surveys/data search conducted in 2020. The assessment was conducted using the criteria described in the Bat Conservation Trust Guidelines (2023) for assessing the potential suitability of proposed development sites for bats, based on presence of habitat features within the landscape, to be applied using professional judgement.

The Site is assessed to have high suitability for foraging and commuting and roosting bats. There are confirmed bat roosts, including a compensation maternity roost for brown long-eared bats at Fir Tree House located 600 m to the northwest of the Primary School and Sports Pitches application area. A high number of trees adjacent the Site have been identified to have suitability to support both individual bat roosts and maternity/hibernation roosts.

4 METHODOLOGY

4.1 GROUND LEVEL TREE ASSESSMENT (GLTA)

A GLTA survey was undertaken by Tessa Pepler on 09 January 2026. The inspection followed the professional survey guidance as detailed in Bat Survey Guidelines for Professional Ecologists: Good Practice Guidelines (Bat Conservation Trust, 2023).

All trees within the Site were inspected systematically for Potential Roost Features (PRFs) that could be used by bats including woodpecker holes, squirrel holes, rot holes, knot holes, pruning cuts, tear outs, wounds, cankers, compression forks, butt rots, lightening strikes, hazard beams, subsidence, cracks, shearing cracks, transverse snaps, welds, lifting bark, desiccation, fissures, frost cracks, fluting and ivy. The assessment was conducted using the criteria described in **Error! Reference source not found..**

Table 1: Guidelines for Assessing the Suitability of Trees on Proposed Development Sites for Bats (Collins, 2023)

Suitability	Description
None	Either no PRFs in the tree or highly unlikely to be any
FAR	Further assessment required to establish if PRFs are present in the tree
PRF	A tree with at least one PRF present

All trees were numbered as per the aboricultural tree plan and marked on a plan of the site. The tree species, height, whether the tree is alive or dead and a tree tag number (if present), the diameter at breast height, number of stems and whether the tree has been coppiced were recorded. Information regarding PRFs present was collected including whether the PRF is on a stem or a limb, the PRF type, height and what direction the PRF faces. The height and orientation of the entrance was recorded if this was different.

4.2 POTENTIAL ROOST FEATURE INSPECTION TREE SURVEY

A PRF inspection was conducted by Billy Wing on 22 - 23 October 2025 accredited under Ellie Hack BSc (Hons) ACIEEM, NE Level 3 and 4 Bat Licence with a ladder and aerial tree climb to conduct a more detailed assessment of the likely suitability for roosting bats in two tree (T158 and T154) and to look for more conclusive evidence of bats including live or dead bats, droppings, staining and odour. A torch and endoscope was used. The following information was recorded:

- The diameter of the stem or limb where the PRF is
- Multiple entrances present
- PRF entrance width
- Internal height, width and depth of PRF
- Substrate within PRF
- PRF apex shape
- Whether PRF is dry, damp or wet
- Competitors present
- Bats absent or present (photo's taken). If present – bat species, number of bats, whether bats are awake or torpid, location of bats, distance from entrance.

- Droppings absent or present (droppings taken for DNA analysis)
- Evidence of bats lacking
- Odour

PRFs are assessed to be either PRF-I – PRF is only suitable for individual bats or very small numbers of bats due to size or lack of suitable surrounding habitats or PRF-M – PRF is suitable for multiple bats and may therefore be used by a maternity colony.

4.3 SURVEY LIMITATIONS/CONSTRAINTS

The tree climbing survey was only been conducted on two trees. The tree climbing survey was conducted outside of the survey season and therefore has not been able to prove absence of summer bat roosts.

The findings of this report are considered valid at the time of the final survey (09 January 2026). Should there be delays to the project timetable and/or implementation of the proposed development, updated desk study and/or survey work may be required. In this instance, advice should be sought to ensure the data, recommendations and conclusions set out in this report remain valid.

It has been assumed that the development proposals are as described in this document and that all proposed mitigation and enhancement measures will be implemented in full.

5 RESULTS

5.1 GLTA AND TREE CLIMBING SURVEY RESULTS

A summary of the results of the trees that were surveyed in the GLTA and tree climbing survey are shown in Table 3. Figure 2 provides the locations of the trees and the GLTA/climbing survey results for The Primary School and Sports Pitches. Where trees/groups of trees/hedgerows have no suitability for roosting bats, they are omitted from **Error! Not a valid bookmark self-reference..**

Table 2: The Primary School and Sports Pitches GLTA & Tree Climbing Survey Results

Tree No.	Tree photo	Tree Species	Other Comments	DBH (cm)	Tree Height (m)	PRF Found?	Feature No.	Photo	PRF Trunk or Branch	PRF Type	Direction PRF Faces	PRF Height (m)	Further Survey?
T269		Ash <i>Fraxinus excelsior</i>	Multi-stem			Yes	PRF1		Trunk	Knot hole	South	3	PRF-I FAR
							PRF2					3	
							PRF3					3.8	

							PRF4					3.5	
T272		Ash <i>Fraxinus excelsior</i>	Single stem			No							
Silver birch group – middle tree		Silver birch <i>Betula pendula</i>	Part of group			Yes	PRF1		Trunk	Knot hole	South	3.5	PRF-I FAR
T40		Oak <i>Quercus robur</i>		100	12	Yes	PRF1		Branch	Knot hole	South east	3	PRF-M FAR

							PRF2		Snapped dead limb, raised bark	South west	3	PRF-M FAR
							PRF3		Dead limb	South east	4	PRF-I FAR
							PRF4		Wound on above dead limb with raised bark.	South east	4.4	PRF-M FAR
							PRF5		Dead branch with wound hole at join with limb	South east	4.7	PRF-I FAR

							PRF6			Cracks in dead limb	North east	3	PRF-I FAR
							PRF7			Hole into dead limb	South	4.7	PRF-M FAR
							PRF8			Wound which may lead into cavity into limb	South west	4.8	PRF-M FAR
							PRF9			Cracks in dead limb	South west	4.8	PRF-I FAR

							PRF1 0			Cracks in dead limb	South west	5	PRF-I FAR
T41		Oak <i>Quercus robur</i>		57.5	9	Yes	PRF1 &2		Branch	Two knot holes leading into a potential cavity	South west	2.5	PRF-M FAR
T49		Cherry <i>Prunus avium</i>		32	12	No							

T150		Goat willow <i>Salix caprea</i>		25	10	Yes	PRF1		Limb	Dead branch unattached and crossed over the main trunk	South	1	PRF-I FAR
T151	Not reachable	Ash		27.5 , 20	9								
T152	Not reachable	Goat Willow <i>Salix caprea</i>		35	7								
T153		Cherry <i>Prunus avium</i>		22.5	8	Yes	PRF1		Limb	Fallen limb	South	2	PRF-I FAR
T154		Goat willow <i>Salix caprea</i>	Multi-stemmed This tree was climbed by Billy Wing and Max Hemmings on 25 September 2025.	3x5 5	11	Yes	PRF1			Hazard beam, on north extending horizontal limb. The entrances face east and west and are 1.5m in length, the interior is largely cluttered with frass. There are small (5cm) sheltered pockets on both	East and west	3	PRF-I

									ends which could host individual bats, likely for night roosts only.			
							PRF2		Hazard beam, north extending lower horizontal limb. The entrances face east and west and are 1.5m in length. On the end furthest away from the tree there is a small cavity of 2cm wide and 5cm deep which could host an individual bat but otherwise very exposed.	East and West	1.5	PRF-I
							PRF3		Rot hole lower northern extending limb, on the same limb as PRF2. The large 50cm by 10cm cavity entrance faces west with a small 5cm long and 3cm diameter tube cavity at the apex with one entrance facing north. Likely night roost only.	West	0.5	PRF-I

							PRF4			Two hazard on the northern extending arched branch. All cavities are exposed to the elements with frass clutter, the cavity extending away from the trunk forms a small tube cavity.	North	3.5	PRF-I
							PRF5			Trunk cavity multiple entrances. The eastern facing entrance is above PRF4 and is 10cm long and 2cm wide with some gnawing marks around the entrance. The cavity extends down 10cm to a nest of straw/reed bedding and extends up 40cm to thick clutter but otherwise clear of debris. The cavity has a width of around 10cm and requires a thin lens endoscope. The second entrance is 10cm above the first but on top of the north-east extending horizontal limb and faces south west. This entrance extends down to the clutter which can be	East	4	PRF-M

										passed to reach the nest below. The cavity also extends up 40cm to a clear 8cm wide cavity which extends up 30cm.			
							PRF6			A tear away branch wound on the V of the highest limb on the east side of the tree. The feature can only be seen from the ground when standing on the south side of the hedgerow. There are some small 4cm cavities under the flaked heart wood and at the apex but otherwise very exposed with lots of woodlice.	East	6	PRF-I
T155		Cherry <i>Prunus avium</i>		22.5	8		PRF1		Limb	Can see into crack, very exposed – suitable as a summer roost only – inspect prior to removal if removed in summer.	South	1.5	PRF-I

T156		Ash <i>Fraxinus excelsior</i>		43	11	No							
T157		Ash <i>Fraxinus excelsior</i>	Not reachable	30	11								
T158		Oak <i>Quercus robur</i>	Veteran – one main trunk that splits into two on east and west side. Climbed by Billy Wing and Max Hemmings on 25 September 2025.	110	8	Yes	PRF1		Trunk	South facing, tear out/pruning cut 4m. Extends into the trunk 10cm to a wedge apex, clean and dry, light cobwebs, with rough edges. The cavity is exposed due to the large entrance.	South	4	PRF-I
							PRF2		Trunk	Tear out wound in the collar, 8m high on the north side of the tree at the base of the dead branch limb.	North	8	PRF-I

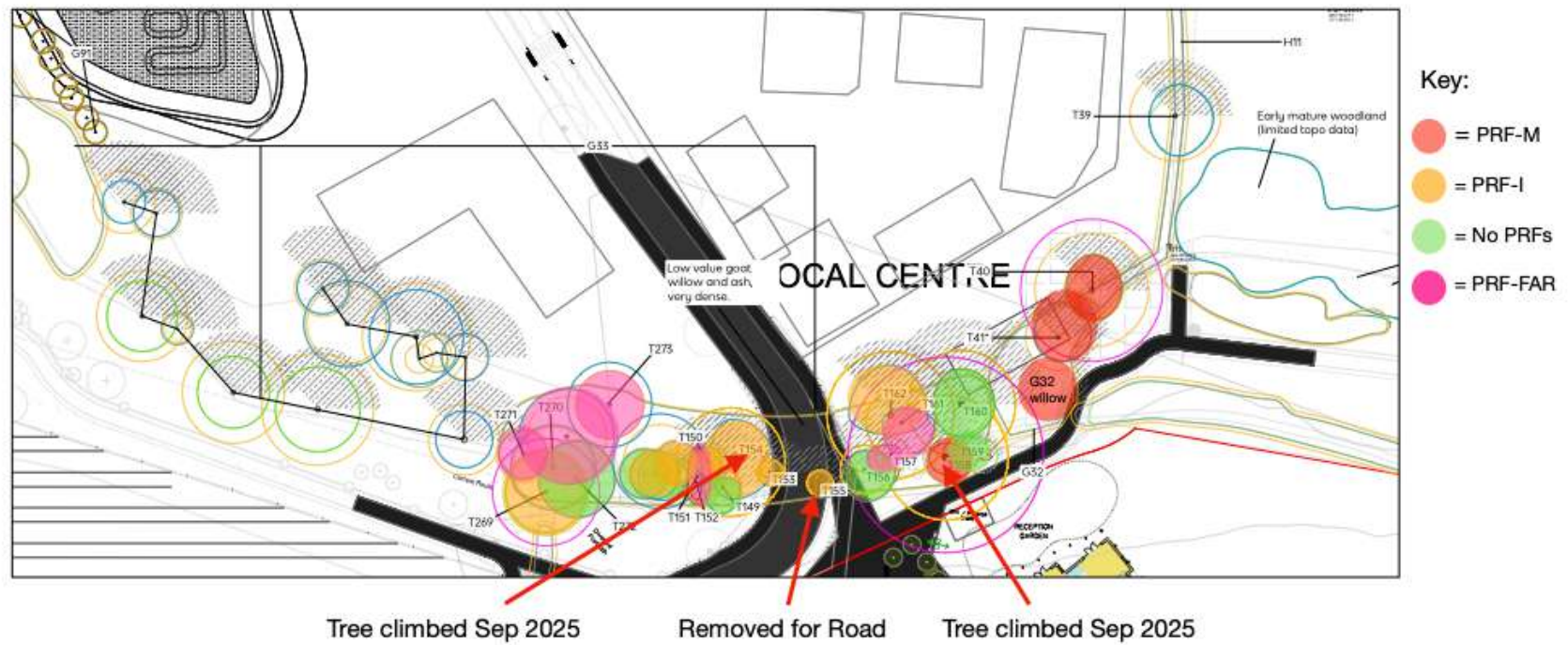
							PRF3		Limb	Northern extending dead horizontal limb at 5.5m high. Multiple desiccations fissures but likely for night roost only.	North	5.5	PRF-I
							PRF4		Limb	Large dead limb on the south side of the tree with multiple dessication fissures and an upwards facing cavity in the dead V, extends down 15cm to a wedge cavity which was dry and clear but slightly exposed.	South		PRF-I
							PRF5		Limb	Dead limb with pruning cut at 4.5m high south west facing. Extends in 8cm than exposed cavity that is clear and dry.	South west	4.5	PRF-I
							PRF6		Limb	Knot hole 4m high south-east facing on the eastern limb. 4cm 7cm by 5cm entrance, extends back 10cm, and back and right 15cm, upwards 4cm, clean, dry, smooth edge with a dome horizontal apex.	South east	4	PRF-M

							PRF7		Limb	Rot hole in dead wood at 4.5m high, north facing. Entrance 5cm, extends back 8cm, downwards facing, smooth, clear with soil at the base.	North	4.5	PRF-I
							PRF8		Limb	 Dead branch cavity on the end of the zig-zag at 7m high on the south-west extending main limb. The zig-zag 'arrow' point faces south-east. Some shelter is possible behind a 10cm flake of dead wood but this is very exposed, likely night roost only. On the same limb there is a 3cm wide knot hole that extends back three 3cm which is also a PRF-I but for a night roost only.	North	7	PRF-I
T159		Ash <i>Fraxinus excelsior</i>		5x8	5	No							

T160		Oak <i>Quercus robur</i>				No							
T161						Not acces sed							FAR
T162							PRF1			Woodland not accessed so south side not viewed. PRF-I on dead cut limb in bark around limb.	North	2	FAR
G32		Willow <i>Salix</i>	Fallen willow – sprawling – rest is hazel and bramble and negligible				PRF1		Limb	Hole		1	PRFM

							PRF2		Limb	Hole		1	PRFM
							PRF3		Limb	Hole		1	PRFM

Figure 2: Primary School and Sports Pitches GLTA and Tree Climb Bat Roost Suitability Plan



6 ASSESSMENT OF FINDINGS, CONSTRAINTS & OPPORTUNITIES

A high number of trees adjacent to the site have features that could support maternity and individual roosts. The majority of trees adjacent to the Site will be protected and retained through the construction and operation phase.

No trees are scheduled for removal under the Primary School and Sports Pitches RMA. There is one tree (T155) that is scheduled for removal under the application for the Internal Distributor Road (F/23/96631). Mitigation measures are described within the ES Appendix 10.12 Landscape and Ecological Mitigation Masterplan (Johns Associates, 2024).

Tree and shrub clearance will be supervised by an ECoW to ensure that trees in proximity to the vegetation removal are not damaged or disturbed by the works, should roosting bats be present in these trees nearby.

A Precautionary Working Method Statement (PWMS) will be implemented for the vegetation removal works and will be provided within the EMMP for the Site.

7 CONCLUSION

There are no proposals for the removal of trees within the application. Trees proposed for removal are located within the application for internal distributor road (F/23/9663) and as such, the mitigation and compensation for their loss is described within the the ES Appendix 10.12 Landscape and Ecological Mitigation Masterplan (Johns Associates, 2024). A PWMS will be implemented for the removal of vegetation. The removal of all scrub vegetation will be supervised by an ECoW.

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