



HMP Ford, Arundel

Ecological Impact Assessment Addendum Note

8th December 2021

1. INTRODUCTION

- 1.1 Ecological Planning & Research Ltd (EPR) was commissioned by Caledonian Modular to carry out an update Ecological Appraisal (EA) and external building inspections at Her Majesty's Prison (HMP) Ford, Ford Road, Ford, Arundel, West Sussex, BN18 0BX (central grid reference TQ 0009 0283; hereafter referred to as the 'Site') in November 2021 in support of a pending planning application.
- 1.2 In September 2021 an Ecological Impact Assessment (EcIA) ¹ was issued detailing the potential impacts of the proposed development scheme on the identified Important Ecological Features (IEFs), and the measures required to avoid, mitigate, and compensate for these effects.
- 1.3 This EcIA Addendum Note has been produced to encompass all additional ecological survey work undertaken since the EcIA submission. This note is intended to be referenced in combination with the September 2021 EcIA and all ecological baseline data stated within the EcIA remains up to date.
- 1.4 Since submission of the EcIA, the Ministry of Justice (MOJ) has requested an update Ecological Appraisal to encompass a revised redline Site boundary and external only bat building inspections of eleven buildings earmarked for demolition. These buildings were included within the proposed development scheme shortly before the EcIA submission.
- 1.5 The initial site walkover focused on five land parcels within the MOJ land ownership, where the proposed development was deemed likely to lead to biophysical changes and could accordingly give rise to ecological impacts. The revised redline boundary discussed within this note encompasses all five previous land parcels detailed within the EcIA. Development is intended to remain within these five land parcels and all five remain largely unchanged from the submitted EcIA, see **Map 1** for the development parcel locations.

Previous Surveys

Desk Study

- 1.6 In December 2018, Arcadis Ltd was commissioned to undertake an Extended Phase 1 Habitat Survey at HMP Ford to include the area within the ownership boundary, see **Map 1**. After a review of the Phase 1 Habitat Survey Report, it can be noted that an ecological data search via

¹ Ecological Planning and Research Ltd (2021) *HMP Ford, Arundel – Ecological Impact Assessment*. Final Report 2131-1B

the local records centre, Sussex Biodiversity Record Centre (SxBRC), was not commissioned. With only open-source data referenced within the desktop study aspect of the report.

Field Survey

- 1.7 In March 2020, Arcadis Ltd undertook the field survey aspect of Extended Phase 1 Habitat Survey within the ownership boundary of HMP Ford. All habitats were mapped referencing the Joint Nature Conservation Committee (JNCC) Phase 1 Habitat Survey Handbook ². Two habitats onsite were deemed as Habitats of Principle Importance (HPI); these included Lowland Mixed Deciduous Woodland and Traditional Orchard.
- 1.8 Several habitats on site were also considered to have potential to support protected species, these included:
- Reptiles;
 - Bats;
 - Birds;
 - Invertebrates; and
 - Dormice.

Summary

- 1.9 Arcadis Ltd concluded 'the site as a whole was considered to have **Moderate** biodiversity value at a **Local Level**' ³. Since the submission of the Arcadis Ltd Phase 1 Habitat Survey report the MOJ has requested that EPR conduct an update EA.

2. ECOLOGICAL SURVEYS

- 2.1 The Site is a developed area comprising mainly roads and buildings with associated hardstanding and several areas of neutral grassland. The wider landscape mainly agricultural land with the River Arun to the east. **Map 1** shows the location of the Site, including the MOJ ownership boundary, the updated redline boundary and the development parcel boundaries stated within the EclA.
- 2.2 The Site is bisected by Ford Road. The area to the east of Ford Road is known as the 'residential area' and the area to the west of Ford Road is known as the 'industries area'.

Ecological Appraisal

- 2.3 An EA site visit, including external only bat building inspections for eleven buildings, was undertaken within and adjacent to the Site. The EA was undertaken by Katrina Diedericks and Barney Scott (Class Survey Licence Level 2 2018-33402-CLS-CLS) of EPR on the 18th of November 2021. The assessment and distribution of habitats within the site was determined

² JNCC (2010) *Handbook for Phase 1 Habitat Survey: A Technique for Environmental Audit*. JNCC, Peterborough.

³ Arcadis (2020) *MOJ Provision of Ecological Consultancy – Phase 1 Habitat Survey – HMP Ford*

and recorded referencing the UK Habitats Classification System (2020 ⁴), and their potential to support species of interest was assessed. The methodology used has been described in more detail in **Appendix 1**.

- 2.4 EA surveys can be conducted throughout the year; however, the update EA was undertaken in November which is considered to be a sub-optimal month for conducting an EA. As such, certain floral species would not have been visible at this time of the year.

Habitats

- 2.5 The distribution of habitat types and features noted during the Site visit is presented on **Map 2** and described further below.
- 2.6 The Site comprise multiple buildings with associated hardstanding, neutral grassland, a mosaic of ephemeral/short perennial and bare ground, scattered trees, broadleaved woodland, waterbodies and ornamental planting.
- 2.7 Given the management of the grasslands on Site they are very unlikely to support priority plant species. The grasslands on Site are generally heavily mown neutral grassland assessed as being of poor condition using the Using Defra's Technical Supplement (JP039) criteria ⁵. The areas of neutral grassland and tall ruderal comprised of Perennial Ryegrass *Lolium perenne*, Cocks foot *Dactylis glomerata*, Creeping buttercup *Ranunculus repens*, Greater plantain *Plantago major*, Ribwort plantain *Plantago lanceolata*, White clover *Trifolium repens*, Yarrow *Achillea millefolium*, Creeping thistle *Cirsium arvense*, Bristly oxtongue *Helminthotheca echinoides*, Creeping cinquefoil *Potentilla reptans*, Self-heal *Prunella vulgaris*, Bird's foot trefoil *Lotus corniculatus*, Nettles *Urtica dioica*, Willowherb sp. *Epilobium sp.*, Ragwort sp. *Jacobaea sp.*, and Butterfly bush *Buddleia davidii*. The neutral grassland has very limited inherent ecological importance although it has some suitability to support notable species, as discussed below.
- 2.8 The boundary habitats comprised of broadleaved woodland to the west and security prison fences to the east. The tree species present on site comprised mainly Hazel *Corylus avellana*, Ash *Frazinus excelsior*, Beech *Fagus Sylvatica*, Poplar *Populus sp.*, Sycamore *Acer pseudoplatanus* and Alder *Alnus glutinosa*. All trees identified within the survey areas have been planted after 1960 (reference to the OS one inch to the mile map 1960) and are not listed as Ancient Woodland; therefore, these trees are not considered to be mature/veteran trees.
- 2.9 A newly established pond was identified to the south of the 'industrial area' on Site. The wildlife friendly pond has gently sloping stone lined banks and recently positioned aquatic plants still within containers. A reservoir is also located within the 'industrial area' of the Site and this waterbody is used to store water required for the nursey plant species grown within the greenhouse buildings on Site.
- 2.10 A traditional orchard was identified adjacent to the Site boundary within the MOJ land ownership. Trees present comprised of Apple species *Malus sp.*

⁴ Butcher, B., Carey, P., Edmond, R., Norton, L. and Treweek, J. (2020). *UK Habitat Classification – Habitat Definitions V1.1* at <https://ukhab.org/>

⁵ Natural England (2021). *Biodiversity metric 3.0: Auditing and accounting for biodiversity* – Technical Supplement.

Evaluation

- 2.11 The broadleaved woodland on Site is considered to be an example of Lowland Mixed Deciduous Woodland, which is a Biodiversity Action Plan Priority Habitat, and as such is considered to be an IEF. However, the broadleaved woodland area is not within the Zone of Influence of the proposed development scheme and therefore will not be taken further within this assessment.
- 2.12 The remaining habitats on Site are of limited botanical value; therefore, these habitats are not considered to be IEFs and will not be taken further within this assessment.
- 2.13 All habitats on site have a potential role in supporting faunal populations and are considered further below.

Fauna

Badger

- 2.14 No Badger *Meles meles* records were returned in the desktop study, the habitats available are not thought to be of significant value for Badgers, and no evidence of Badgers was noted during the update EA.

Bats

- 2.15 The data search returned 15 species of bat within 2km of the Site. The closest record is for a Common pipistrelle *Pipistrellus pipistrellus* located approximately 280m south of the Site.
- 2.16 Eleven buildings on site were subjected to a building inspection, see **Map 2**. Building assessments involved external inspections only based on survey methods described in the Bat Survey Guidelines (BCT, 2016 ⁶). All buildings were then categorised for their suitability to support a bat roost.
- 2.17 The following buildings present features suitable for roosting bats:
- GV – Low bat roosting suitability;
 - G1 – Moderate bat roosting suitability;
 - G2 – Moderate bat roosting suitability;
 - P1 – Low bat roosting suitability;
 - P2 – Low bat roosting suitability;
 - 01 – Moderate bat roosting suitability;
 - 02 – Low bat roosting suitability;
 - I1 – Low bat roosting suitability;
 - I2 – Low bat roosting suitability;
 - H1 – Low bat roosting suitability; and
 - H2 – Low bat roosting suitability.

⁶ Bat Conservation Trust (2016). *Bat Surveys for Professional Ecologists - Good Practice Guidelines*. 3rd Edition. Bat Conservation Trust, London.

- 2.18 All buildings, except for GV, inspected were noted to have internal loft spaces. Internal building inspections were not undertaken.
- 2.19 Overall, three buildings on site have been assessed to have Moderate bat roosting suitability and the remaining eight buildings have Low bat roosting suitability. Photos of the buildings including descriptions of roosting features identified can be found in **Appendix 2**.
- 2.20 All species of bat and their roosts are protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended).
- 2.21 All of the eleven buildings subjected to the external only building inspection on site are earmarked for demolition, and as such will be affected by the proposed re-development. Therefore, further assessment will be required to determine the presence or absence of bat roosts in buildings assessed to have Low or Moderate bat roosting suitability, and to characterise any subsequent identified roosts.
- 2.22 In line with the *Bat Surveys for Professional Ecologist: Good Practice Guidelines* (Bat Conservation Trust, 2016), buildings/structures assessed to have either Low, Moderate or High suitability to support roosting bats, must be subject to further survey work in the form of dusk/dawn emergence/re-entry surveys. Moderate suitability buildings/structures and require a minimum of two surveys, generally involving one dusk emergence surveys and one dawn re-entry survey, undertaken in the period May to September, with at least one of these between May and August.
- 2.23 Buildings with Low bat roosting suitability, should be subject to one dusk emergence or dawn re-entry survey, undertaken between May and August, inclusive. Should high levels of bat activity be recorded in association with the building, or roosting bats are identified, then up to two further surveys may be required.
- 2.24 Currently, no buildings within the inspections are assessed to have High bat roosting suitability.
- 2.25 Dusk emergence surveys take place 15 minutes before sunset and finish 1.5 – 2 hours after sunset, whilst dawn re-entry surveys begin 1.5 – 2 hours before sunrise and finish 15 minutes after sunrise. Surveys are undertaken by professional, experienced bat surveyors using handheld bat detector and recording devices.
- 2.26 In view of the legal protection afforded to bats and their roosts, works which are likely to affect bat roosts should be undertaken under a European Protected Species Licence (EPSL). An EPSML will typically prescribe a sensitive working method, to avoid harm to bats, and the provision of compensatory roosting opportunities.
- 2.27 The habitats within the Site are predominantly grassland and scattered trees, with riparian habitats within the wider landscape. These habitats have a moderate suitability for foraging and commuting bats and are likely to be utilised by common and widespread species such as Common pipistrelle and Soprano pipistrelle *Pipistrellus pygmaeus*, Noctule *Nyctalus noctula* and Serotine *Eptesicus serotinus*.
- 2.28 No trees on site were subjected to a Ground Level Tree Inspection (GLTI). Several of the trees on site may contain features with the potential to support bat roosts. If the development proposals require the removal of any trees or has the potential to result in an impact on the treelines and scattered trees then, in line with guidelines, these will require further inspection

by a bat licensed ecologists to assess any features and their potential to support roosting bats. The results of the GLTI survey may indicate the need for further survey work, in the form of tree climbing inspections or emergence surveys on trees deemed to have greater than low suitability for bats. GLTI survey can be undertaken between May and October.

- 2.29 Uncontrolled Site lighting may result in the abandonment of roosts and commuting locations, potentially causing an offence under the provisions of the Wildlife & Countryside Act (1981) and the Habitats Regulations (2017).
- 2.30 Construction activities should be subject to detailed prescriptions set out within a Construction Environmental Management Plan (CEMP), including but not limited to:
- Restrictions on working hours;
 - Directional lighting away from building features; and
 - Use of warm-white lighting.
- 2.31 Once completed, the proposed development scheme has the potential to result in increased lighting levels within the immediate vicinity of the Site in absence of mitigation. Due to the highly light-sensitive nature of bats, if foraging and commuting areas were to become significantly illuminated, this could deter bats from using the area. Therefore, to prevent long-term disturbance to the local bat assemblage, a lighting strategy is recommended to minimise the impacts and ensure sensitive areas are not significantly and unnecessarily illuminated.
- 2.32 Enhancement opportunities for bats would include the placement of bat boxes integrated within the new accommodation blocks on Site, or on retained trees within the wider prison landscape.

Breeding Birds

- 2.33 Common bird species were noted flying through the site; however, the habitats available are not thought to be of significant value to any birds of conservation concern. Breeding bird surveys are therefore not recommended. However, as trees on Site were identified as suitable for nesting birds the legal protection afforded to nesting birds is considered within **Appendix 3**.

Dormice

- 2.34 No Dormice *Muscardinus avellanarius* records were returned within the desktop study. The broadleaved woodland is considered the only habitat with suitability for use by Dormice; however, the habitat is not being impacted upon by the proposed development scheme and Dormice surveys are not considered necessary.

Great Crested Newts and Common Amphibians

- 2.35 Great Crested Newt (GCN) *Triturus cristatus* surveys were not deemed necessary by Arcadis Ltd, as the open-source data search returned no GCN records and the only accessible pond surveyed returned a 'Poor' score for its suitability to support GCN using the HSI method of assessment (Oldham *et al*, 2000 ⁷).
- 2.36 An update desktop and field survey undertaken by EPR identified a total of 35 GCN records terrestrially connected within 2km of the site and assessed the reservoir as having a 'below

⁷ Oldham, R.S., Keeble, J., Swan, M.J.S. and Jeffcote, M. (2000). *Evaluating the suitability of habitat for the Great Crested Newt (Triturus cristatus)*. Herpetological Journal 10 (4), 143-155.

average' score based on Oldham *et al*, due to the gentle sloping nature of the waterbodies banks and bank vegetation which were inaccessible to large fish species.

- 2.37 GCN are protected from killing, injury, disturbance and damage or obstruction to their habitat under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended). As such, further surveys were recommended within the initial Ecological Appraisal ⁸.
- 2.38 EPR conducted an eDNA GCN survey in May 2021 and no GCN were identified within the reservoir on Site. A wildlife pond has recently been installed on Site and so was not subjected to an eDNA survey in 2021. This pond is considered likely to attract GCN onto the site within the coming seasons as the pond establishes.
- 2.39 As GCN are known within 2km of the site and considering the legal protection afforded to GCN, if the clearance of potentially suitable terrestrial habitat is required then EPR recommend undertaking this work under an Ecological Clerk of Work (ECoW) Method Statement. The legal protection afforded to GCN is detailed within **Appendix 3**.

Invertebrate Assemblage

- 2.40 The habitats present on Site are not thought to support an invertebrate assemblage of any significant value and are therefore not considered further.

Reptiles

- 2.41 Three common species of reptile have been recorded within 2km of the site (Common Lizard *Zootoca vivipara*, Slow-worm *Anguis fragilis* and Grass snake *Natrix Helvetica*).
- 2.42 The habitats on Site have potential to provide foraging, commuting, refuge, and hibernating opportunities for common reptiles (likely Common Lizard, Grass Snake and Slow-worm). The Site is well connected to the wider landscape; therefore, it is possible that reptile species could be utilising suitable habitats on Site.
- 2.43 All reptile species are protected under the Wildlife and Countryside Act 1981 (as amended), which makes it is an offence to intentionally or recklessly kill or injure species of reptile.
- 2.44 A reptile survey was undertaken in 2021 within suitable reptile habitat being impacted upon by the proposed development scheme. No reptiles have been recorded on site. However, given the records within the wider landscape and the legal protection afforded to reptiles, if the clearance of potentially suitable habitat is required then EPR recommend undertaking this work under an Ecological Clerk of Work (ECoW) Method Statement. The legal protection afforded to reptiles is detailed within **Appendix 3**.

Riparian Mammals

- 2.45 There are no watercourses on Site which would be suitable for use by Water Vole *Arvicola amphibious* and Otter *Lutra lutra*.

Other Species of Principal Importance

- 2.46 Several Hedgehogs *Erinaceus europaeus* were noted on Site during previous bat emergence surveys undertaken in 2021. In addition, the Site provides suitable foraging habitat for Hedgehogs. This species is protected under the Wildlife and Countryside Act 1981 (as

⁸ Ecological Planning and Research Ltd (2020) *HMP Ford, Arundel – Ecological Appraisal*. Final Report 20/45-1B.

amended) and is listed as a Species of Principal Importance under the NERC Act 2006. Hedgehogs are also protected under the Mammals Acts 1996.

- 2.47 If any of the areas suitable for Hedgehogs are likely to be affected by the proposed development scheme, then mitigation measures are likely to be required to ensure their protection. Such measures are likely to involve checking suitable areas prior to clearance followed by the relocation of any Hedgehogs found to suitable habitat nearby.
- 2.48 The sowing of a wildflower seed mix grassland either within the proposed development scheme or within the wider prison landscape would benefit Hedgehogs and support other species which Hedgehogs prey upon.

3. CONCLUSION

- 3.1 Overall, the habitats on Site likely to be impacted upon by the proposed development scheme are of low botanical value; however, these habitats could offer resources for protected or valued species, which could pose a constraint on development and will require further consideration. In combination with the geographical setting and connectivity to the wider landscape, the Site has the potential to support a range of ecologically important fauna assemblages including:
- European Protected Species and Priority S41; Great Crested Newts and bats;
 - BoCC and Priority S41 bird species;
 - Priority S41 reptiles and common amphibians; and
 - Species of Principle Importance; Hedgehogs

Summary of Recommendations

- 3.2 **Table 4.1** provides a summary of the further work recommended in **Section 2**.

Table 4.1: Recommended further work.

Feature/Species	Further Surveys/ Required Mitigation	Action	Timing
Bats	Building surveys	Emergence/re-entry surveys on low and moderate bat roost suitability buildings	Between May and the end of September.
Breeding Birds	Nesting bird checks	A pre-commencement check to be undertaken before the removal of suitable nesting vegetation/boxes and building work.	Between May and the end of September. Any active nests identified will be left undisturbed until young have fledged.
Amphibians	ECoW	Supervised clearance of all suitable amphibian habitat.	March to October inclusive
Reptiles	ECoW	Supervised clearance of all suitable reptile habitat.	March to October inclusive

Feature/Species	Further Surveys/ Required Mitigation	Action	Timing
Hedgehogs	ECoW	Supervised soft clearance of all suitable Hedgehog hibernation habitats	March to November

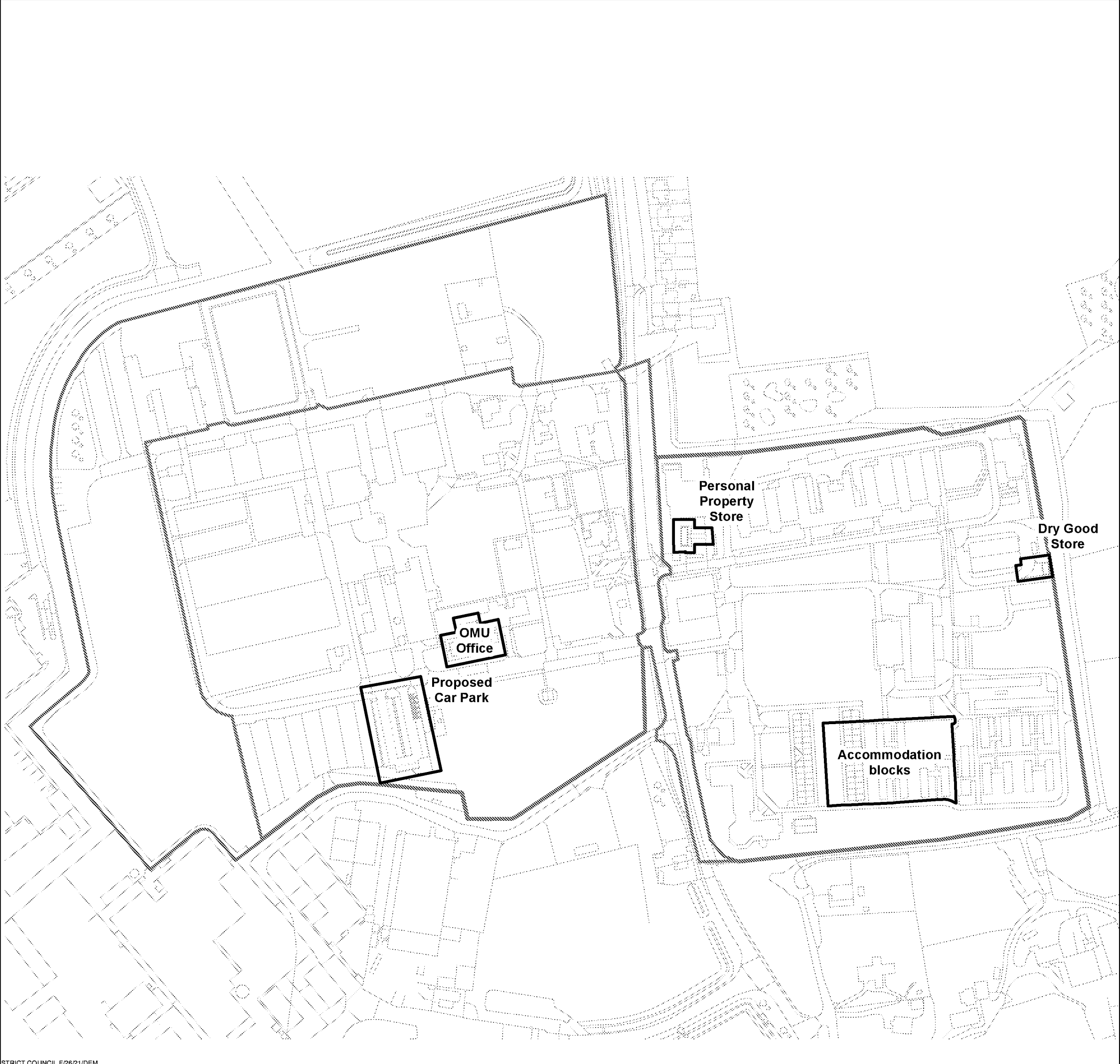
Document Prepared By: Katrina Diedericks BSc (Hons) GradCIEEM

Document Dated: 08 December 2021

Document Reviewed By: Alison Hogan BSc (Hons) MSc MCIEEM

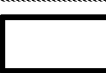
Maps

Map 1	Site Location
Map 2	Habitats and Features



MAP 1 Site Boundaries

KEY

-  Ownership boundary
-  Red line boundary
-  Development land parcels

SCALE: 1:2,750 at A3

0 25 50 75 100 Metres



CLIENT: Caledonian Modular

PROJECT: HMP Ford

DATE: 06 December 2021

Y:\HMP Ford, Arundel\2151\GIS\ESRI\Update E:\Map1_SiteBoundaries_P2151_1414_061221a.mxd



MAP 2 Habitats & Features

KEY

- Ownership boundary
- Red line boundary
- Scattered broadleaved trees
- Coniferous treeline
- Broadleaved intact hedgerow
- Broadleaved treeline
- Fence
- Wall
- Scrub - dense/continuous
- Neutral grassland
- Other neutral semi-improved grassland
- Standing water
- Amenity grassland
- Bare ground/gravel
- Buildings
- Ephemeral/short perennial
- Greenhouses - Internal bare ground/hardstanding
- Hardstanding
- Introduced shrub
- Orchard
- Artificial grass

SCALE: 1:2,750 at A3

0 25 50 75 100 Metres



CLIENT: Caledonian Modular

PROJECT: HMP Ford

DATE: 06 December 2021

Y:\HMP Ford_Aerial\2151\GIS\Biodiversity\Map2_HabitatsAndFeatures_P2151_1414_061221.mxd

P21/31

Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

Appendix 1

Methodology

Ecological Appraisal

Desk Study Methodology

A desk study was carried out to gather and refer to existing biodiversity and contextual information with respect to the Zone of Influence. This involved interrogation of internet resources, including the Multi-agency Geographic Information for the Countryside (MAGIC), aerial photos, current Ordnance Survey maps and historical maps. Reference was also made to local planning policies, strategies and initiatives relating to biodiversity.

A biological records request was made in 2020 to the Sussex Biodiversity Record Centre (SxBRC) for any existing biological records in their database. The local records search and other desktop research was over a 2km radius for nationally and locally important features and a 5km radius for European Protected Species and sites of European significance.

Fieldwork Methodology

The ecological appraisal was completed by Katrina Diedericks on the 18th November 2021. The Site and immediately surrounding land were walked where accessible, recording habitats and features of potential importance to wildlife and any evidence of, or potential for, protected or priority species or habitats, in accordance with the methods described below.

Land Use, Habitat Types, Vegetation Communities and Flora

Within the Site the land use, habitat types and landscape features (such as hedgerows) were described. For each main habitat type the dominant vegetation communities were recorded, along with any priority or indicator plant species. A preliminary evaluation of the structure, quality and likely management of each habitat or feature was also carried out.

The survey method used to record this information was based on the UK Habitats Classification System and the mapping symbology was based on the JNCC Extended Phase 1 habitat mapping system.

Badgers

Consideration was given to the presence of habitat potentially suitable for supporting Badgers, including woodland and grassland. Potential evidence of the presence of Badgers was looked out for and noted, including earthworks that might be Badger setts, and signs such as dung pits, mammal pathways through ground vegetation and under fences, and hairs on fences.

Bats

Bats use buildings and trees for roosting and breeding and, where present, a preliminary assessment of the potential for these features to support bats was undertaken during the survey in accordance with categories set out within the Bat Conservation Trust's Bat Surveys Good Practice Guidelines (2016). Potential may include gaps beneath roof or hanging tiles, in soffits, or beneath the end of ridge tiles, but

also under the edge of felt on flat roofs. In trees potential roosting features include woodpecker holes, splits in branches and peeling bark.

A preliminary evaluation was also undertaken of potential bat foraging habitat in the area, including woodland, pasture, hedges and watercourses.

Hazel Dormouse

The type and quality of habitat with the potential to be suitable for supporting Hazel Dormice, such as woodland and hedgerows, was considered during the survey. In particular the presence of Oak, Hazel and berry-bearing shrubs was noted, and the connectivity of habitat recorded.

Birds

Any birds seen whilst carrying out the survey were recorded, and the type and quality of habitats available for birds was considered, including vegetation suitable for nesting, and habitat with the potential to support valued species, including breeding and wintering birds.

Amphibians

Consideration was given to the presence of habitat potentially suitable for supporting amphibians, including waterbodies (ponds, ditches), woodland, scrub and rough grassland, and features such as log piles that might provide hibernation areas.

Reptiles

The presence and quality of habitat considered potentially suitable for supporting reptiles was recorded. This included areas providing basking and foraging opportunities, hibernation and breeding sites, such as rough grassland and scrub, banks, burrows, rubble piles, compost heaps, hedgebanks and waterbodies.

Invertebrates

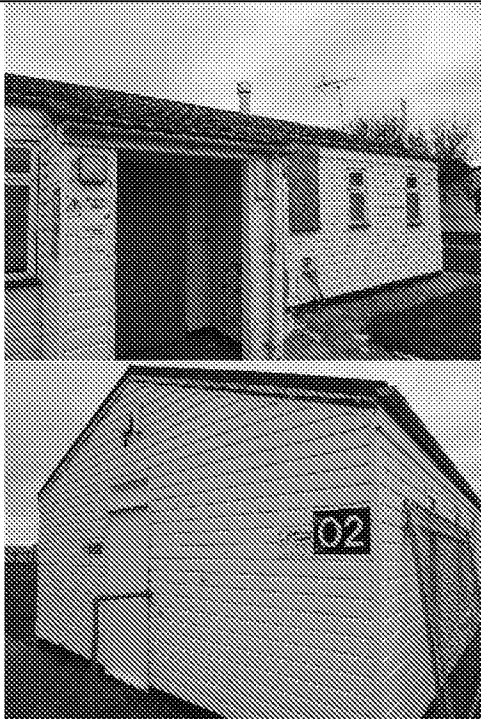
Habitats and features likely to support noteworthy groups and species were noted, for example herb-rich grasslands, areas of bare ground and deadwood habitats.

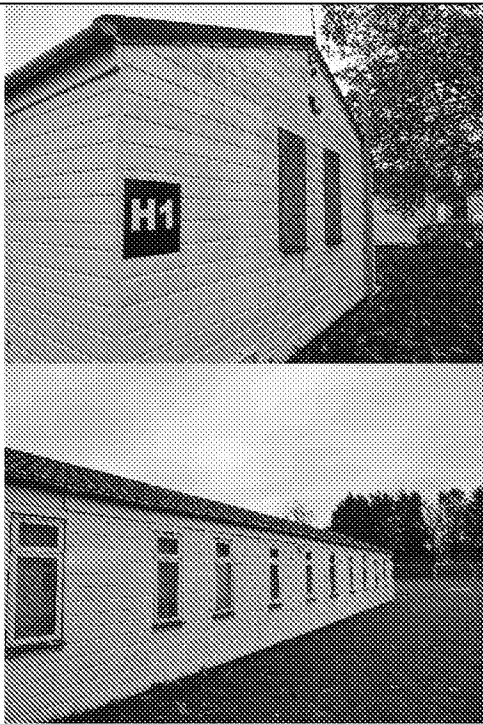
Appendix 2

Details of Buildings with Bat Roosting Suitability

Ref.	Description	Potential roosting features	Suitability	Photographs
GV	Multi-faith building, c. 1920s, Single storey, flat felt roof, and brick walls.	Crack in cement soffit	Low	
		Crack in soffit		
G1	Single storey c. 1920s Wooden building with UPVC cladding, UPVC/wooden soffits, UVPC windows, and bitumen felt 'tile' roof. Confirmed loft space – not inspected.	Small gaps under felt 'tiles' and along roof ridge line	Moderate	 
		Small gaps under soffit boards		
		Vent hole		
		Small gaps between UVPC cladding and wooden soffit boards		
G2	Single storey c. 1920s Wooden building with UPVC cladding, UPVC/wooden soffits, UVPC windows, metal chimney and	Small gaps under felt 'tiles' and along roof ridge line	Moderate	
		Small gaps under soffit boards		

	bitumen felt 'tile' roof. Confirmed loft space – not inspected.	Small gaps between UPVC cladding and wooden soffit boards		
P1	Single storey c. 1920s Wooden building with UPVC cladding, UPVC/wooden soffits, UPVC windows, and bitumen felt 'tile' roof. Confirmed loft space – not inspected.	Very small gaps under felt 'tiles' and along roof ridge line	Low	
		Very small gaps under soffit boards		
		Very small gaps between UPVC cladding and wooden soffit boards		
P2	Single storey c. 1920s Wooden building with UPVC cladding, UPVC/wooden soffits, UPVC windows, metal chimney and bitumen felt 'tile' roof. Confirmed loft space – not inspected.	Very small gaps under felt 'tiles' and along roof ridge line	Low	
		Very small gaps under soffit boards		
		Very small gaps between UPVC cladding and wooden soffit boards		

01	Single storey c. 1920s Wooden building with UPVC cladding, UPVC/wooden soffits, UVPC windows, metal chimney and bitumen felt 'tile' roof. Confirmed loft space – not inspected.	Small gaps under felt 'tiles' and along roof ridge line	Moderate	
		Small gaps under soffit boards		
		Small gaps between UVPC cladding and wooden soffit boards		
		Vent hole		
02	Single storey c. 1920s Wooden building with UPVC cladding, UPVC/wooden soffits, UVPC windows, metal chimney and bitumen felt 'tile' roof. Confirmed loft space – not inspected.	Very small gaps under felt 'tiles' and along roof ridge line	Low	
		Very small gaps under soffit boards		
		Very small gaps between UVPC cladding and wooden soffit boards		
11	Single storey c. 1920s Wooden building with UPVC cladding, UPVC/wooden soffits, UVPC windows, metal chimney and bitumen felt 'tile' roof.	Very small gaps under felt 'tiles' and along roof ridge line	Low	
		Very small gaps under soffit boards		
		Very small gaps between		

	Confirmed loft space – not inspected.	UPVC cladding and wooden soffit boards		
I2	Single storey c. 1920s Wooden building with UPVC cladding, UPVC/wooden soffits, UPVC windows, metal chimney and bitumen felt 'tile' roof. Confirmed loft space – not inspected.	Very small gaps under felt 'tiles' and along roof ridge line Very small gaps under soffit boards Very small gaps between UPVC cladding and wooden soffit boards	Low	
H1	Single storey c. 1920s Wooden building with UPVC cladding, UPVC/wooden soffits, UPVC windows, metal chimney and bitumen felt 'tile' roof. Confirmed loft space – not inspected.	Very small gaps under felt 'tiles' and along roof ridge line Very small gaps under soffit boards Very small gaps between UPVC cladding and wooden soffit boards	Low	
H2	Single storey c. 1920s Wooden building with UPVC cladding, UPVC/wooden soffits, UPVC windows, metal chimney and bitumen felt 'tile' roof.	Very small gaps under felt 'tiles' and along roof ridge line Very small gaps under soffit boards Very small gaps	Low	

	Confirmed loft space – not inspected.	between UVPC cladding and wooden soffit boards		
--	---------------------------------------	--	--	--

Appendix 2

Legal Considerations

Nesting Birds

All birds their nests and eggs and dependent young are protected under the Wildlife and Countryside Act and should not be harmed or destroyed. In order to avoid infringing the legal protection afforded to nesting birds, it is recommended that, where possible, all vegetation over 50cm in height is removed outside of the bird nesting season (March to August inclusive). Where this is not possible, the vegetation in question should be subject to a nesting bird check by an experienced ecologist not longer than 24 hours prior to clearance. If an active nest is discovered, it should be left in situ behind an appropriately sized protected area (to be advised by the ecologist) until any young have fledged and left the nest.

Great Crested Newts

GCN are protected from killing, injury, disturbance and damage or obstruction to their habitat under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended).

GCN have not been identified on site but are known within 2km of the site. Therefore, due to the clearance of potentially suitable terrestrial habitat this work will need to be completed under an Ecological Clerk of Work (ECoW) Method Statement. These measures should be secured through the CEMP.

Adherence to the requirements ECoW Method Statement will ensure that no legal offences are committed in respect of GCN. An experienced ecologist will also deliver a Toolbox Talk to all site personnel on the first day of clearance works, to ensure that contractors understand the protection afforded to GCN, what they look like, the working methods stipulated in the ECoW Method Statement, and why they must stop and contact the ecologist should they find (or suspect they have found) a GCN.

Reptiles

All four of the widespread British species of reptile, namely the Common Lizard, Slow Worm, Grass Snake and Adder, are Species of Principal Importance in England (listed on Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006). They are protected under Schedule 5 (Sections 9.1, 9.5a, 9.5b) of the Wildlife & Countryside Act 1981 (as amended) from intentional or reckless killing, injury and trade (see Appendix 1 for further details).

A reptile survey returned no records of reptiles on site; however, are known within 2km of the Site. As such, it is recommended that continued management of the reptile habitat on Site is undertaken to ensure that the Site is rendered unsuitable for reptiles. This would include a staged habitat clearance measure, to reduce the vegetation height on Site.

If reptiles are found during the works, the following precautionary site clearance measures under ecological supervision measures would be required:

- Delivery of toolbox talk to all personnel on site prior to site clearance works commencing; and
- A supervised destructive search of reptile habitats to incorporate the following steps:
 - Reduction of any above ground vegetation with a sward height greater than 10cm using trimmers/brushcutters;
 - Careful phased removal of topsoil using an excavator with a toothed bucket;
 - Any reptiles found during the search will be removed to safety away from the works, e.g. retained edge habitats;
 - Spoil heaps will not be left to vegetate and will be removed from site or flattened following the completion of the search; and
 - The search will only be carried out in the active season for reptiles (March – October) and will avoid adverse weather conditions such as heavy rain, wind or snow.