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PRELIMINARY ECOLOGICAL APPRAISAL

At

Royal British Legion Club

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EXECUTIVE SUMMARY

United Environmental Services Ltd (UES) was commissioned by RDD Ltd to carry out a baseline ecological survey of the Royal British Legion Club and an adjacent land parcel. A desk study and preliminary ecological appraisal (PEA) survey were undertaken on 28th September 2017, including searches using the Multi Agency Geographic Information Centre (MAGIC) and National Biodiversity Network (NBN). The PEA provides an assessment of potential ecological impacts associated with the development site.

The proposed development site comprises two adjacent land parcels separated by a road that runs north to south.

The eastern section mostly comprises amenity grassland and tall ruderal vegetation. An area of hardstanding and six detached garages are present at the eastern boundary of this section.

The western section comprises the disused Royal British Legion Club with associated amenity grassland, scattered scrub and hardstanding with developing ephemeral / short perennial vegetation.

The habitats on site offer limited resources to local wildlife and they are common in the local area.

The results of the survey combined with the results of the desk study have highlighted the requirement for further work in relation to the following habitats and species:

- **Trees** – generic issues relating to root protection areas.
- **Breeding birds** – works are to take place outside of the breeding bird season (March to August inclusive). If not possible, a targeted nest survey is to be undertaken or an ecological clerk of works appointed to oversee the works.

Mitigation measures, as detailed in section 4, should be adhered to, which may in some cases negate the need for further survey work.

This report should be read with appendices 1 to 6, which include results of the desk study, GIS phase 1 habitat mapping, photographs of site and relevant statutory guidance.

1 INTRODUCTION

1.1 Author, surveyors, qualifications and scope of study area

This report is written by Tom Kenwright BSc MSc and UES Graduate Ecologist. Other surveyors present included:

- Toby Hart BSc MCIEEM PIEMA, UES Managing Director. Toby holds a level 6 Botanical Society for Britain and Ireland (BSBI) field identification skills certificate (FISC), which certifies him as competent to undertake phase 1 habitat and national vegetation classification (NVC) surveys.

The report provides an assessment of the potential ecological impacts associated with the proposed development of the Royal British Legion Club and an adjacent parcel of land.

The zone of influence considered within the scope of the survey includes all land within the red line boundary. Where relevant, other ecological resources, receptors and important habitats which are spatially separate from the site are considered.

1.2 Survey objectives

UES was commissioned in September 2017 to conduct a PEA of the proposed development site. This was completed in order to:

- Establish baseline conditions and determine the importance of ecological features present or potentially present within the survey area
- Identify key ecological constraints to the project
- Make recommendations for design options to avoid significant effects on important ecological resources at an early stage of development planning
- Identify potential requirement for further surveys for nationally or internationally protected species which may be present on site
- Identify potential requirement for mitigation or compensation, including measures that may be required based on further surveys

1.3 Proposed development

At this stage, no detailed proposals have been submitted to UES. The proposals will likely involve the demolition of the buildings currently present on site.

1.4 Structure of the report

This report is a baseline appraisal that forms the basis for further ecological surveys and Environmental Impact Assessments (EIA) if required. In the majority of cases the preliminary ecological assessment will not provide all the ecological data required by the Local Planning

Authority to determine an application, especially in the event that protected habitat or species issues are present or likely.

This report should be read with appendices 1 to 6, which include results of the desk study, GIS phase 1 habitat mapping, photographs of site and relevant statutory guidance.

2 METHODOLOGY

This PEA comprises a desk study and a field survey. The desk study is conducted in order to collate ecological information on species and / or habitats of interest that may be present. The field survey is conducted in order to assess the habitats and their importance, both on site and in the context of their wider surroundings.

2.1 Desk study

The following resources were used to inform the desk study:

- National – Using the UK government’s MAGIC website, statutorily protected sites were scoped to a distance of 10km from the application site.
- Local – UES has not been commissioned to undertake an environmental records search at this point. Where necessary, the author has used the National Biodiversity Network (NBN) Atlas website to inform the survey.

2.2 Field survey

An ecological walkover survey was carried out on 28th September 2017 by Toby Hart and Tom Kenwright. The purpose of the survey was to identify, record and map dominant habitats types within the development area and highlight any further species surveys that may be required based on the quality of those habitats. When conducting the surveys particular focus was concentrated on the following species and habitat features:

- | | |
|------------------|-------------------------|
| • Amphibians | • Hedgerows |
| • Reptiles | • Plant communities |
| • Badger | • Invasive species |
| • Bats | • Otter |
| • Hazel dormouse | • Water vole |
| • Birds | • White-clawed crayfish |
| • Trees | |

The habitats were assessed by using the phase 1 habitat survey technique, which is a system for environmental audit widely used within the environmental consultancy field. The survey was undertaken in accordance with the methodology in the ‘Handbook for phase 1 habitat survey - A technique for environmental audit’ (JNCC, 2010) as recommended by Natural England, and in the “Guidelines for Preliminary Ecological Appraisal” (CIEEM, 2013).

The survey area encompasses all of the land within the development footprint and the land to a distance of 30m outside it where accessible. In line with recognized guidelines, ponds were also scoped to a distance of 500m (250m radius from the survey area).

The phase 1 habitat survey methodology was extended to record any signs of habitats suitable to support protected / invasive species and any incidental observations of other noteworthy species.

2.3 Survey limitations

No limitations were encountered during the survey.

3 RESULTS

3.1 Desk study

A desk study was conducted for the proposed development site and surrounding area. Statutorily protected sites were scoped to a distance of 10km. Further results of the desk study can be found at Appendix 1 – Desk study.

3.1.1 Protected sites

There is one statutorily protected site within 2km of site:

- St. Bees Head SSSI¹
The designation covers approximately 172ha and 8km of the Cumbria coastline, stretching between St Bees and Whitehaven. The site encompasses the sheer cliff face, an area of cliff-top grassland and the shore down to the mean low-water mark. The biological interest of the site is represented in a number of different habitats: natural cliff-top grassland and heath, sheer cliff face and cliff-fall rubble, shingle and wave-cut platform. The outstanding interest of this area lies, however, in the sheer cliffs which provide the only breeding site on the coast of Cumbria for a variety of colonial seabirds. These include over 2,000 pairs of guillemots along with lesser numbers of fulmar, kittiwake, razorbill, cormorant, puffin, shag and herring gull. The cliffs are, in addition, the only breeding site on the entire coast of England for black guillemots.

There are seven statutorily protected sites (designated for ecological reasons) within 2 – 10km of site:

- Black Moss SSSI
- Clints Quarry SSSI
- Haile Great Wood SSSI
- Harrington Reservoir LNR²
- High Leys NNR³, SSSI
- River Ehen SAC⁴
- River Ehen (Ennerdale Water to Keekle Confluence) SSSI

3.1.2 Protected species

The following records of protected or otherwise notable species were highlighted by the NBN records search (2km buffer around site):

- Birds: various species, including several NERC section 41 and Wildlife and Countryside 1981 Schedule 1 species;
- Mammals: otter *Lutra lutra*, hedgehog *Erinaceus europaeus*.

¹ Site of Special Scientific Interest

² Local Nature Reserve

³ National Nature Reserve

⁴ Special Area of Conservation

3.2 Baseline conditions – Habitats

The results of the PEA are also shown on the accompanying map at Appendix 2 – Phase 1 habitat plan. Habitats are colour-coded in accordance with the phase 1 standard.

The local area predominantly consists of residential dwellings and areas of public open space including parks and playing fields. Areas of woodland are present to the north-east and south-east. The site lies approximately 725m east from the Cumbria coastline. The site is split into two sections either side of Hilltop Road. The following principle habitat types were characterised on site:

- A2.2 Scattered scrub
- A3.3 Scattered broadleaved trees
- B6 Poor semi-improved grassland
- C3.1 Tall ruderal
- J1.2 Amenity grassland
- J1.3 Ephemeral / short perennial vegetation
- J3.6 Buildings
- J5 Hardstanding

3.2.1 A2.2 Scattered scrub

On the western section of site, there is a small section of scrub within the north-west corner. It consists of bramble *Rubus fruticosus* agg. and introduced species including rose *Rosa* sp. and apple *Malus domestica*.

3.2.2 A3.3 Scattered broadleaved trees

There is a single mature sycamore *Acer pseudoplatanus* tree located just off site, to the south of the eastern section of site. The tree falls outside of the development boundary and will be unaffected by the development proposals.

3.2.3 B6 Species-poor semi-improved grassland

The amenity grassland within the western section of the site has recently been left unmanaged and has succeeded into poor semi-improved species grassland. This grassland has a higher botanical diversity than the amenity grassland within the western section of the site. Species present include dandelion *Taraxacum officinale*, red fescue *Festuca rubra*, red clover *Trifolium pratense*, white clover *Trifolium repens*, ribwort plantain *Plantago lanceolata*, mugwort *Artemisia vulgaris*, rosebay willowherb, autumn hawkbit *Scorzoneroideis autumnalis*, hogweed *Heracleum sphondylium*, ash saplings, cock's foot *Dactylis glomerata*, false oat-grass, common ragwort *Jacobaea vulgaris*, perennial ryegrass *Lolium perenne*, silverweed *Argentina anserina*, Yorkshire fog *Holcus lanatus*, bramble, lady fern *Athyrium filix-femina*, cowslip *Primula veris*, creeping bent *Agrostis stolonifera*, soft rush *Juncus effusus*, curled dock *Rumex crispus*, broad-leaved dock, hawkweed *hieracium* sp., common mouse ear *Cerastium fontanum*, stinging nettle, creeping buttercup *Ranunculus repens*, common couch *Elymus repens*, common bent *Agrostis capillaris*, great willowherb, garden privet *Ligustrum ovalifolium*, smooth sow thistle *Sonchus oleraceus*, annual meadow grass *Poa annua*,

common sorrel *Rumex acetosa*, lesser trefoil *Trifolium dubium*, common catsear *Hypochaeris radicata*.

3.2.3 C3.1 Tall ruderal

A large stand of tall ruderal vegetation is present along the north, south and eastern borders of the eastern site. This is dominated by great willowherb *Epilobium hirsutum*, rosebay willowherb *Chamerion angustifolium* and bramble. Other species present include stinging nettle *Urtica dioica*, wood avens *Geum urbanum*, false oat-grass *Arrhenatherum elatius*, broad-leaved dock *Rumex obtusifolius*, hedge bindweed *Calystegia sepium*, cleavers *Galium aparine*, field horsetail *Equisetum arvense*, male fern *Dryopteris filix-mas*, and *Ribes sp.* as well as elder *Sambucus nigra*, ash *Fraxinus excelsior*, hawthorn *Crataegus monogyna* and sycamore saplings.

3.2.4 J1.2 Amenity grassland

The eastern section of the site is mostly comprised of amenity grassland that is managed through regular mowing. Species present include dandelion *Taraxacum officinale*, white clover *Trifolium repens*, ribwort plantain *Plantago lanceolata*, rosebay willowherb, cock's foot *Dactylis glomerata*, perennial ryegrass *Lolium perenne*, Yorkshire fog *Holcus lanatus*, broad-leaved dock, creeping buttercup *Ranunculus repens*, annual meadow grass *Poa annua*, common knapweed *Centaurea nigra*, creeping thistle *Cirsium arvense*, prickly sow thistle *Sonchus asper* and herb robert *Geranium robertianum*.

3.2.5 J1.3 Ephemeral / short perennial vegetation

Short perennial / ephemeral species have begun to colonise the areas of hardstanding that are present in site (appendix 2 – target note 1). Species present include dandelion, white stonecrop *Sedum album*, autumn hawkbit, greater plantain, common daisy *Bellis perennis*, field forget-me-not *Myosotis arvensis*, ash saplings, mugwort, short-fruited willowherb *Epilobium obscurum*, colt's foot *Tussilago farfara*, columbine *Aquilegia sp.*, spear thistle *Cirsium vulgare*, American willowherb *Epilobium ciliatum*, hemp-agrimony *Eupatorium cannabinum*, fox-and-cubs *Pilosella aurantiaca*, mouse-eared hawkweed *Hieracium pilosella*, broad-leaved willowherb *Epilobium montanum*, hairy bittercress *Cardamine hirsute*, grey speedwell *Veronica polita*, groundsel *Senecio vulgaris*, knotgrass *Polygonum aviculare*, pineappleweed *Matricaria discoidea*. Additionally, the following species were observed within the walls on site: wall-rue *Asplenium ruta-muraria*, maidenhair spleenwort *Asplenium trichomanes*, ivy-leaved toadflax *Cymbalaria muralis*, common polypody *Polypodium vulgare* and hart's tongue fern *Asplenium scolopendrium*.

3.2.6 J3.6 Buildings

Seven buildings are present on site including the unoccupied Royal British Legion Club within the western section and six detached single garages within the eastern section.

Building 1 is the former Royal British Legion Club which is now unoccupied and has been unused for some time. The building is a single storey breezeblock construction with rendered walls, which consists of two parts; the main building and an extension which has recently been affixed to the southern aspect. The majority of the roof is of a pitched construction with external

bituminous roofing felt. The extension has a pitched roof with concrete roof tiles, all of which are in good condition.

Buildings 2-7 are single storey detached garages currently used for storage purposes. They are constructed from either concrete with pebbledash rendering or from corrugated sheet metal. The roofs are a mix of flat and sloped structures and are all constructed from corrugated sheet metal.

Full building description are included within the bat scoping survey report (UES02192/02).

3.2.7 J5 Hardstanding

Numerous areas of hardstanding are present on both sections of the site, including areas of concrete and gravel.

3.3 Baseline conditions – Protected species or resources

As part of the PEA, specific observations of wildlife were also recorded. Wildlife observations focused on protected species, invasive species or species of conservation concern. Habitats with potential to support protected species were noted with a view to follow up surveys if required.

3.3.1 Amphibians

There are no records of great crested newts *Triturus cristatus* (GCNs) within 2km of the development site.

There are no ponds within 250m of the development site and connectivity is poor between the site and waterbodies within the wider landscape. The site is surrounded by residential dwellings and roads which would act as barriers to amphibian movement.

There are also no ponds present within 500m of the site, however a large lake is present approximately 340m south of the site. There is limited connectivity between the lake and the site due to the presence of roads, buildings and large areas of regularly mown grassland which offer limited shelter for commuting amphibians.

The terrestrial habitats within the development footprint are broadly unsuitable for GCNs. The tall ruderal vegetation within the eastern site offers sub optimal foraging opportunities for amphibians.

It is considered that GCNs are not using the site and are not present within the immediate vicinity of the site. They need no further consideration within the current planning application.

3.3.2 Reptiles

There are no records of reptile species within 2km of the development site.

The habitats on site are broadly unsuitable for reptiles, with the small areas of tall ruderal and scrub offering sub optimal foraging habitats.

It is considered that reptiles are not using the site and are not present within the immediate vicinity of the site. They need no further consideration within the current planning application.

3.3.3 Badger

There are no records of badger within 2km of the development site.

No evidence of badger activity was observed on site during the walkover survey. The eastern site is sloped and has the potential to provide a suitable habitat for sett building. The site however is small and is set within an urban area with high levels of disturbance and lighting.

Superior badger foraging and sett building habitat is available within the woodland areas to the north-east and south east of the site.

It is considered that badgers are not using the site and are not present within the immediate vicinity of the site. They need no further consideration within the current planning application.

3.3.4 Bats

The buildings on site were subject to a full bat scoping survey which involved a detailed internal and external inspection to assess the potential for bats to be roosting on site. All buildings on site are considered to have negligible potential for roosting bats and no further surveys are required. Full details of the bat scoping survey, including detailed building descriptions, are provided within the UES bat scoping report (UES02192/02).

There are no mature trees on site that have features suitable for roosting bats. A mature sycamore tree within a residential garden to the south overhangs the site but will be unaffected by the development proposals.

The habitats on site offer limited foraging opportunities for commuting and foraging bats and superior habitat is present within the wider environment including the aforementioned lake to the south and areas of woodland to the north-east and south-east.

It is considered that bats are unlikely to be roosting on site and need no further consideration within the current planning application.

3.3.5 Hazel dormouse

There are no records of dormice within 2km of the development site.

The habitats on site are unsuitable for dormice as no woodland or hedgerows are present and the scrub on site is relatively sparse.

Therefore dormice need no further consideration within the current planning application.

3.3.6 Birds

A targeted bird survey was not conducted during the site visit and no bird species were recorded nesting or roosting on site. The following bird species were observed or heard calling within the vicinity of the site; starling *Sturnus vulgaris*, house sparrow *Passer domesticus*, robin *Erithacus rubecula*, goldfinch *Carduelis carduelis* and chiffchaff *Phylloscopus collybita*.

The habitats on site are small in area and are largely unsuitable for birds. However, the scattered scrub, tall ruderal vegetation and buildings on site all provide suitable nesting opportunities for breeding birds in the summer.

3.3.7 Trees

There are no tree species on site which are afforded statutory protection.

3.3.8 Plant communities

No plant communities or individual species were recorded on site which are afforded statutory protection in their own right.

3.3.9 Invasive species

No invasive species are present on the site.

3.3.10 Otter, water vole and white-clawed crayfish

There is a single record (NBN) of an otter within 2km of the development site. This record dates from 2016 and is located within Whitehaven Marina approximately 1.2km north of the site. There are no records of water vole *Arvicola amphibius* or white-clawed crayfish *Austropotamobilius pallipes* in the local area.

There are no waterbodies on site or within the immediate vicinity of the site that would provide suitable habitat for these species. Therefore, they need no further consideration within the current planning application.

4 EVALUATION AND RECOMMENDATIONS

This section provides a brief assessment of the likely impacts associated with the proposed development on the receptors identified during the walkover survey and desk study. It also includes any mitigation and compensation measures which may be required for the proposed development to proceed.

4.1 Habitats

4.1.1 Designated sites

The sites identified during the desk study were cross-referenced with the survey area relevant to this report. The closest statutorily protected site is St. Bees Head SSSI, which lies approximately 550m to the west of the proposed development site.

Given the distances from site and the scale of development, it is considered unlikely that the proposed development will have any direct or indirect impact on this or any other local designated sites.

4.1.2 Trees

No trees are present on site. A single mature tree overhangs the southern boundary of the eastern site.

Construction impacts

Site clearance and setting out may result in damage to the offsite tree which is to be retained.

Mitigation

Any works close to the tree should consider root protection areas (RPAs). The RPA is calculated as an area surrounding the tree / hedge, with a radius of 12 times the stem diameter at 1.5 metres height. Any works within this radius must be undertaken subject to the following methods:

- Works to dig and remove soil to a depth of up to 600mm will be undertaken using hand tools
- Any roots of greater than 25mm diameter will be retained and infrastructure positioned around them

The minimum amount of pruning should be undertaken, sufficient to facilitate works onsite. Pruning must only be undertaken outside of bird nesting season (March to August inclusive), or if this is not possible, it must be undertaken following a search for active nests by a suitably qualified ecologist.

Operational impacts

No operational impacts are envisaged.

4.2 Species

4.2.1 Birds

There are a number of habitats, such as scattered scrub, tall ruderal and buildings which could support breeding birds.

Construction impacts

Vegetation removal and building demolition could result in the direct loss of nests, any individuals within the nests and of available nesting territories if conducted during the breeding season.

Mitigation

Site clearance and vegetation removal (including enabling works) should be carried out outside of the breeding bird season, March to August inclusive. If this is not possible, a targeted breeding bird nest scoping survey should be conducted prior to the start on site or an ecological clerk of works appointed.

Compensation

Loss of suitable nesting habitat could be compensated for through the provision of bird boxes affixed to newly constructed buildings. At the time of writing this report no detailed plans are available, but bird boxes that could be used on site include:

- Schwegler 1SP sparrow terrace
- Schwegler 3S starling nest box
- Manthorpe swift nest bricks

Correct siting of bird boxes should be conducted with the aid of the project ecologist.

Landscaping can also be used to promote biodiversity through the appropriate design of habitats and creating habitat mosaics, which provide resources to local wildlife. Principles and landscaping ideas beneficial to wildlife and relevant to this site include:

- Planting of berry and nut bearing shrub species to encourage winter birds
- Planting and management of shrubs which develop a mosaic of structures to support breeding birds
- Use of nectar bearing flowers to encourage invertebrates (such as bees, flies, beetles and butterflies)

See Appendix 5 – Landscape design for birds for further guidance.

Operational impacts

No operational impacts are envisaged.

5 CONCLUSION

The proposed development site comprises two adjacent land parcels separated by a road that runs north to south. The eastern section mostly comprises amenity grassland and tall ruderal vegetation. An area of hardstanding and six detached garages are present at the eastern boundary of this section. The western section comprises the disused Royal British Legion Club with associated amenity grassland, scattered scrub and hardstanding with developing ephemeral / short perennial vegetation.

The habitats on site offer limited resources to local wildlife.

The preliminary ecological appraisal has highlighted potential issues with the following ecological receptors on or adjacent to site: trees and breeding birds. Provided these issues are addressed in accordance with the recommendations detailed in this report, the development may proceed without adversely impacting the aforementioned ecological receptors.

6 REFERENCES

CIEEM (2013). *Guidelines for Preliminary Ecological Appraisal*.

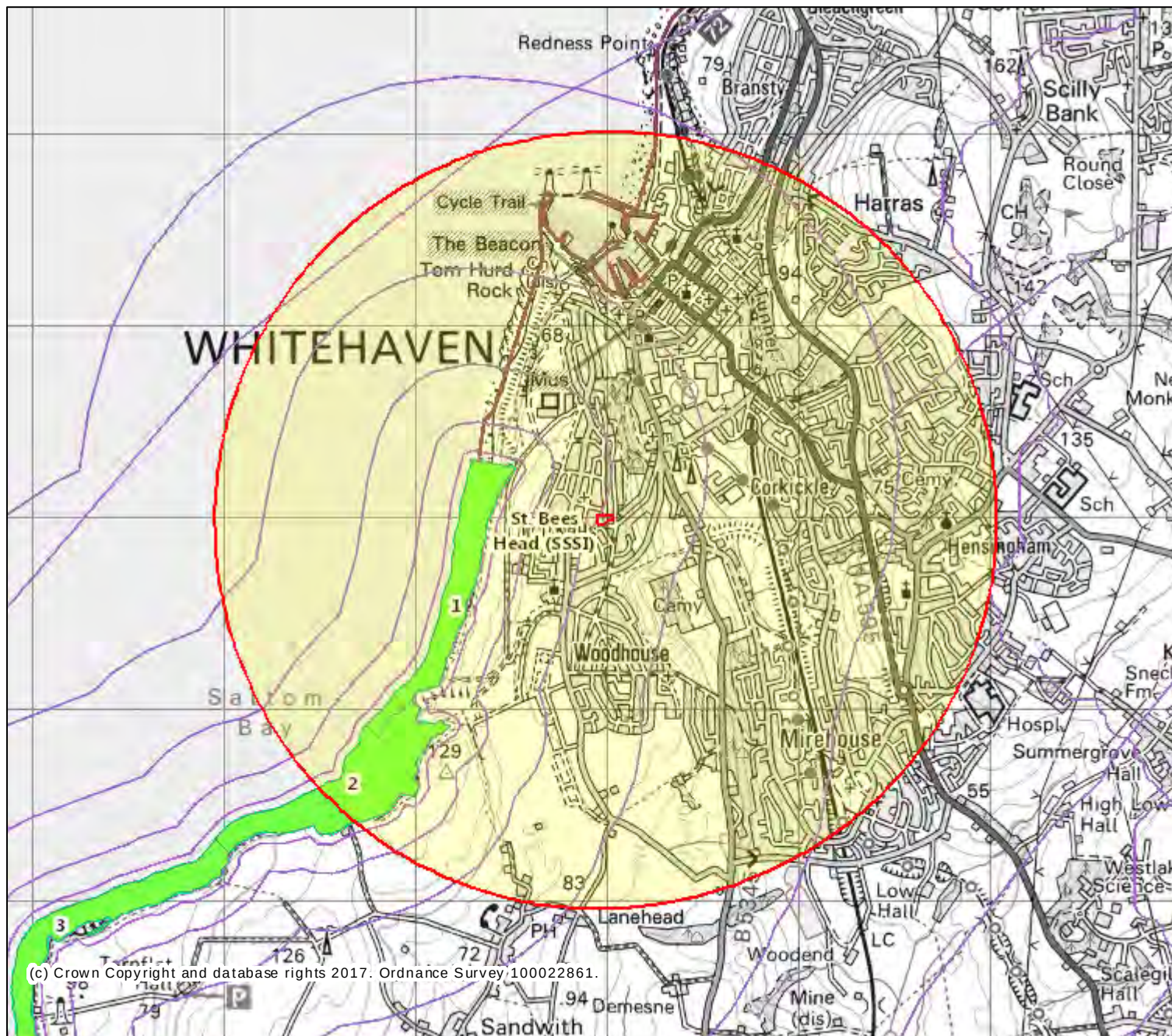
DEFRA (2016). *MAG/C* [online]. Available at: <http://magic.defra.gov.uk/>.

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National Biodiversity Network (2016). *NBN Gateway* [online]. Available at: <https://data.nbn.org.uk/>.

APPENDICES

Appendix 1 – Desk study



Legend

- Local Nature Reserves (England)
- Moorland Line (England)
- National Nature Reserves (England)
- National Parks (England)
- Ramsar Sites (England)

Sites of Special Scientific Interest Units (England)

- Favourable Condition
- Unfavourable Recovering
- Unfavourable no change
- Unfavourable Declining
- Part Destroyed
- Destroyed
- Not Assessed

Sites of Special Scientific Interest (England)

- SSSI Impact Risk Zones - to assess planning applications for likely impacts on SSSIs/SACs/SPAs & Ramsar sites (England)

Special Areas of Conservation (England)

Special Protection Areas (England)

Biosphere Reserves (England)

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ymin = 514600

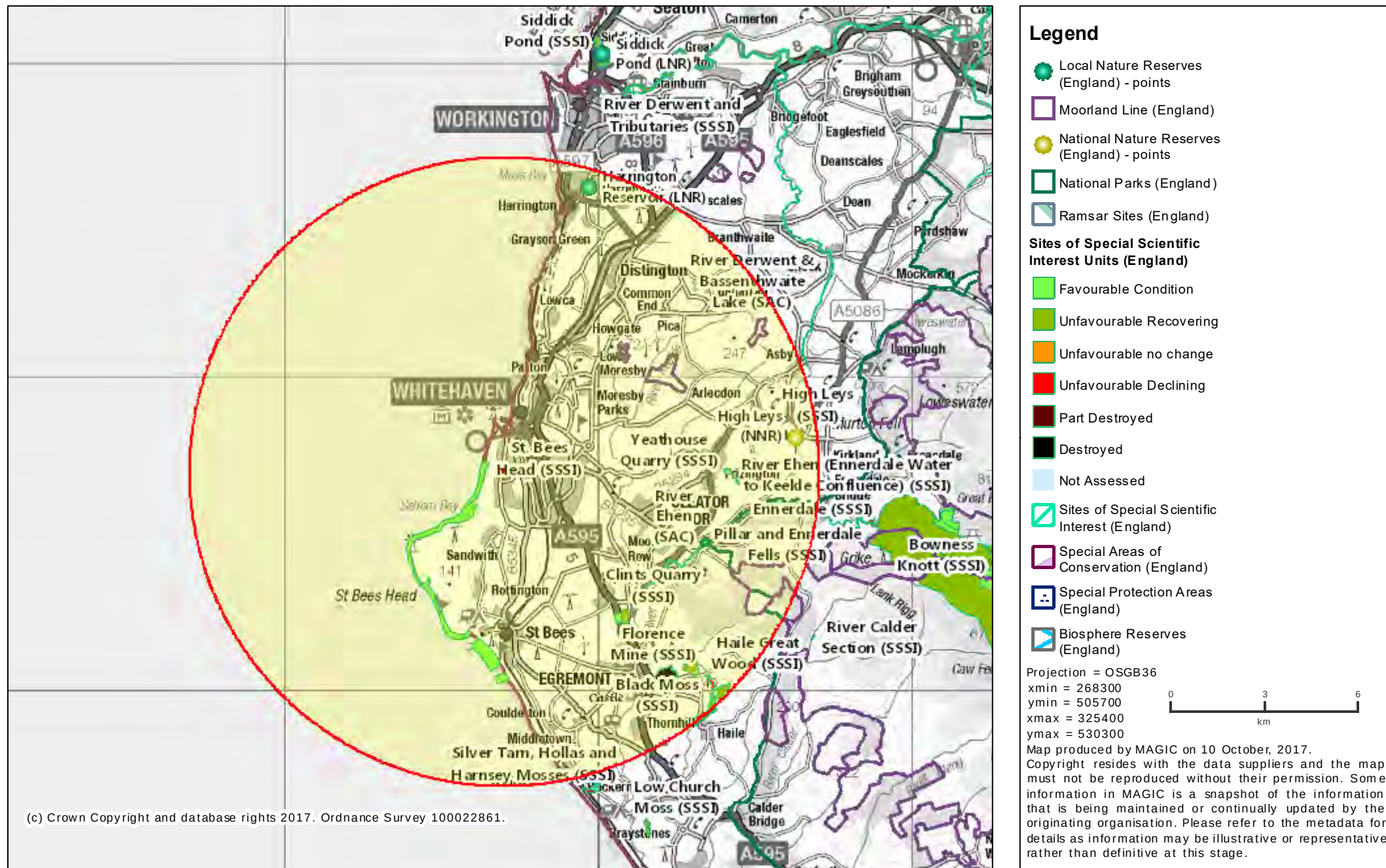
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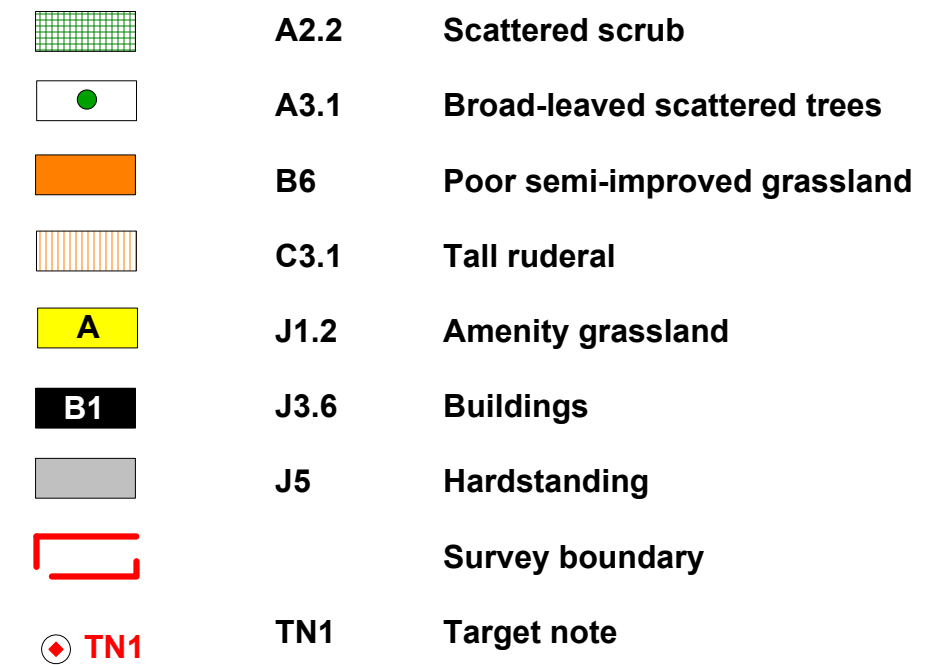
Map produced by MAGIC on 10 October, 2017.

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Appendix 2 – Phase 1 habitat plan

TN1 – Ephemeral / short perennial vegetation



THIS PLAN IS BASED UPON THE ORDNANCE SURVEY MAP WITH THE SANCTION OF
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Appendix 3 – Aerial photographs

**Royal British Legion Club,
Whitehaven**

Close aerial photograph

Development
boundaries



**Royal British Legion Club,
Whitehaven**

Close aerial photograph

 **Site Location**

Appendix 4 – Photographs



Photograph 1 – Looking east towards poor semi-improved grassland within the western site.



Photograph 2 – Looking north-east towards building 1.



Photograph 3 – Hardstanding with encroaching ephemeral / short perennial vegetation on the western section of the site.



Photograph 4 – Scattered scrub on the north-west corner of the western site.



Photograph 5 – Looking west towards buildings 2, 3 and 4.



Photograph 6 – Looking west towards buildings 5, 6 and 7.



Photograph 7 – Amenity grassland on the eastern section of the site.



Photograph 8 – Tall ruderal vegetation within the eastern section of the site.

Appendix 5 – Landscape design for birds

SPECIES	F	SIZE				LOCATION			SOIL		BENEFITS TO WILDLIFE
		T	S	M	L	H	W	Su/Sh	MOISTURE		
TREES											
Alder*	D				Y				Su	M	Seed food for birds
Beech*	D			Y	Y	Y			Su	D	Seed food for birds
Birch*	D		Y	Y	Y				Su	D	Seed food for birds
Bird cherry *	D		Y	Y					Su	D	Food for birds, flowers attract insects
Crab apple*	D		Y	Y	Y				Su	D	Food for birds, flowers attract insects
English oak*	D				Y				Su	D	Food for birds, insects and mammals, nesting sites
European larch*	D				Y				Su	M	Seed food for birds
Holly*	E		Y	Y	Y	Y			Su	D	Fruits eaten by birds, food plant of holly blue butterfly
Juniper*	E								Su	D	Shelter and nest sites, fruits eaten by thrushes
Lime*	D				Y	Y			Su	D	Seed food for birds
Rowan*	D			Y	Y				Su	D	Fruits eaten by birds
Scot's pine*	E				Y				Su	D	Seed food for birds
Swedish whitebeam	D		Y	Y	Y				Su	D	Food for birds, flowers attract insects
Wild cherry*	D			Y	Y				Su	D	Food for birds, flowers attract insects
Yew*	E		Y	Y	Y	Y			Su	D	Food for birds, nesting sites
SHRUBS											
Barberry	B	Y	Y	Y	Y	Y			Su	D	Good shelter and nest cover for birds, berries may provide food
Blackthorn*	D			Y	Y	Y			Su	M	Attracts insects, food for birds, nesting sites
Buckthorn*	D			Y	Y	Y			Su/Sh	D	Food plant of brimstone butterfly, fruits eaten by birds
Butterfly bush	E	Y	Y	Y	Y	Y			Su	D	Attracts insects
Californian lilac	E			Y	Y	Y	Y		Su	D	Flowers attractive to various insects
Cotoneaster	B	Y	Y	Y	Y	Y	Y		Su	D	Flowers attractive to insects, fruits eaten by birds
Dogwood*	D			Y	Y	Y			Su	D	Food for birds, winter stem colour
Elder*	D			Y	Y	Y	Y		Su	D	Food for birds
Escallonia	E			Y	Y	Y			Su	M	Flowers attractive to various insects, tolerant of salt - good in coastal areas
Field maple*	D			Y	Y	Y	Y		Su	D	Good source of insect food for birds
Firethorn	E	Y	Y	Y	Y	Y	Y		Su	D	Berries popular with many bird species
Flowering current	D			Y	Y	Y			Su	D	Early flowers attractive to insects
Forsythia	D			Y	Y	Y	Y	Y	Su	D	Early flowers attractive to insects
Garria	E	Y	Y	Y	Y		Y		Su	D	Winter catkins, early cover for nesting birds
Goat willow*	D	Y	Y	Y	Y				Su	D	Catkins attractive to bees, good source of insect food for birds
Gorse*	E			Y	Y	Y			Su	D	Early flowers attractive to insects, good protection for birds
Rhytismatales	E			Y	Y	Y			Su	D	Good cover, tolerant of salt - good in coastal areas
Guelder-rose*	D			Y	Y	Y			Su	D	Food for birds & insects
Hawthorn*	D			Y	Y	Y	Y		Su	D	Flowers attractive to insects, fruits eaten by birds, good shelter and nesting site
Hazel*	D	Y		Y	Y	Y			Su	D	Food for birds, insects and mammals, nesting sites

Laurel-leaved viburnum	E	Y	Y	Y		Su	D	Early flowers good for insects, good cover for birds		
Lavender	E	Y	Y	Y	Y	Su	D	Flowers attract many insects, seeds popular with finches		
Lilac	D	Y	Y	Y		Su	D	Flowers attractive to insects		
Oregon grape	E	Y	Y	Y		Su/Sh	M	Early flowers good for insects		
Pheasant berry	E		Y	Y		Su	D	Berries popular with many bird species		
Privet*	E	Y	Y	Y	Y	Su	D	Flowers attract butterflies, produces berries		
Rose	D	Y	Y	Y	Y	Y	Su	D	Fruits of some varieties attractive to birds	
Rosemary	E	Y	Y	Y	Y	Y	Su	D	Flower attract many insects	
Shad bush	D		Y	Y			Su	M	Flowers attract insects, early forming berries good for thrushes	
Snowberry	D		Y	Y	Y		Su/Sh	D	Flowers attractive to bees, fruits attractive to birds, dense stems provide cover	
Spindle*	D		Y	Y	Y		Su	D	Berries eaten by birds, but poisonous to mammals	
Tamarix	D		Y	Y	Y		Su	D	Flowers attractive to various insects, tolerant of salt - good in coastal areas	
CLIMBERS & RAMBLERS										
Bramble*	D		Y	Y	Y	Y	Y	Su/Sh	D	Food for birds, insects and mammals, nesting sites
Clematis	D	Y	Y	Y	Y			Su	D	Nesting sites
Honeysuckle*	D	Y	Y	Y	Y	Y	Y	Su/Sh	D	Attractive to insects, good nesting site, food for birds
Ivy*	E	Y	Y	Y	Y	Y	Y	Su/Sh	D	Attractive to insects, good nesting site, food for birds
Rose	D	Y	Y	Y	Y	Y	Y	Su	D	Fruits of some varieties attractive to birds
Virginia creeper	D	Y	Y	Y	Y		Y	Sh/Sh	D	Good cover for nests on walls, shelter for insects
Winter jasmin	E	Y	Y	Y	Y	Y	Y	Su	D	Early flowers attractive to insects
Wisteria	D	Y	Y	Y	Y		Y	Su	D	Attractive to insects, good nesting site

KEY			
*	Native (NB: some varieties are cultivars or non-native)	Location	H = may be used as a hedge plant
F	D = Deciduous		W = may be used as a wall shrub
Foliage type	E = Evergreen		Su = Sunny borders
	B = Both		Sh = Shade tolerant
Size	T = Terraces & balconies		Su/Sh = Grows in partial shade
Suitable for garden sizes	S = Small garden (<= 6m x 4m)	Soil moisture	D = Well drained
	M = Medium gardens (<= 12m x 6m)		M = Moist
	L = Large gardens (> 12m x 6m)		W = Wet soil

SPECIES	PLANT TYPE					LOCATION	SOIL	ATTRACTIVE TO			
	P	B	A	Ar	H	Su/Sh		MOISTURE	Be	Bu	Mo
FLOWERS											
Alyssum	Y		Y			Su	D	Y	Y	Y	Y
Angelica*	Y					Su	D				Y
Annual coreopsis			Y			Su	D	Y	Y		
Annual scabious			Y			Su	D	Y	Y		Y
Bee sage			Y			Su	D	Y			
Borage			Y			Su	D	Y			
Candytuft			Y	Y		Su	D	Y	Y		Y
Catmint	Y					Su	D	Y		Y	
Chives	Y				Y	Su	D	Y	Y		
Clover	Y					Su	D	Y		Y	
Comfrey*	Y					Su	D	Y		Y	
Common poppy*			Y	Y		Su	D	Y	Y		
Corn chamomile*			Y	Y		Su	D	Y			Y
Corn marigold*			Y	Y		Su/Sh	D	Y			Y
Corn spurrey*			Y	Y		Su/Sh	D				
Corncockle*			Y	Y		Su	D	Y			
Cornflower*	Y	Y	Y	Y		Su	D	Y	Y	Y	Y
Dahlias			Y			Su	D	Y	Y		
Deadnettle*	Y			Y		Su/Sh	D	Y			
Devil's-bit-scabious	Y					Su/Sh	M	Y	Y		Y
Evening primrose		Y				Su	D			Y	
Fennel	Y				Y	Su	D				Y
Field scabious*	Y					Su	D		Y	Y	Y
Field woundwort*	Y			Y		Su	D	Y		Y	
Foxglove*		Y				Su	D	Y		Y	
Foxtail millet	Y					Su	D				
French marigold	Y		Y			Su	M	Y	Y		Y
Goldenrod*	Y					Su	D	Y		Y	Y
Greater knapweed*	Y					Su/Sh	D	Y	Y	Y	Y
Hemp agrimony*	Y					Su/Sh	D		Y	Y	Y
Honesty		Y				Su/Sh	D		Y		Y
Larkspur			Y	Y		Su	D	Y	Y		
Lesser snapdragon*			Y	Y		Su	D	Y			
Lungwort	Y					Sh	D	Y			
Meadow clary*	Y					Su	D	Y		Y	
Mexican hat			Y			Su	D	Y	Y		
Michaelmas daisy	Y					Su	D		Y	Y	Y
Nasturtium			Y		Y	Su	D	Y	Y		
Pinks	Y					Su	D			Y	
Red valerian	Y					Su	D			Y	Y
Round-leaved fluelin*			Y	Y		Su	D	Y			
Sage	Y				Y	Su	D	Y		Y	
Sea holly	Y					Su	D	Y			
Sedum	Y					Su	D	Y	Y		Y
Small scabious*	Y					Su	D		Y	Y	Y
Soapwort	Y					Su	D			Y	
Spiked speedwell*	Y					Su	D	Y		Y	

Sunflower	Y	Y	Su	D	Y	Y		Y
Sweet william		Y	Su	D	Y	Y	Y	
Teasel*		Y	Su	D	Y	Y	Y	
Thistle*		Y	Su	D	Y		Y	Y
Tobacco plant			Y	Su	D	Y	Y	Y
Viper's bugloss*		Y		Y	Su	D	Y	
Whorled clary*	Y			Su	D	Y		Y
Wild carrot*		Y		Su	D			Y
Wild clary*	Y			Su	D	Y		Y
Wild marjoram*	Y		Y	Su	D		Y	Y

KEY	
*	Native
Plant type	P = Herbaceous perennial B = Biennial A = Annual Ar = Arable flower H = Herb
Location	Su = Sunny borders Sh = Shade tolerant Su/Sh = Grows in partial shade
Soil moisture	D = Dry soil M = Moist soil W = Wet soil
Attractive to	Be = Bees Bu = Butterflies Mo = Moths Ho = Hoverflies

Appendix 6 – Planning and statutory context

Ecological assessments

Ecological assessments play an important part within the planning context; they include an initial assessment which highlights any specific interests of a site. From the initial site assessment, the surveyor assesses the suitability of habitats within the site to support protected species and makes recommendations for further survey works if required. The following paragraphs provide a brief interpretation of legislative protection in relation to the following species and habitats:

Amphibians

Great crested newts

Other amphibians

Reptiles

Badgers

Hazel dormouse

Bats

Birds

Trees

Hedgerows

Invasive plant species

Otters

Water voles

White-clawed crayfish

Planning policy

Amphibians

Great crested newts

Great crested newts (GCN) *Triturus cristatus* and their habitat (aquatic and terrestrial) are afforded full protection by the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2010. If both national and international legislation are taken together, it is an offence to:

- Deliberately, intentionally or recklessly kill, injure or capture GCN
- Deliberately, intentionally or recklessly disturb GCN in such a way to be likely to significantly affect:
 - their ability to survive, breed, reproduce, rear or nurture their young
 - their ability to hibernate or migrate
 - their local distribution or abundance
- Deliberately, intentionally or recklessly take or destroy the eggs of GCN
- Damage or destroy breeding sites or resting places of GCN
- Intentionally or recklessly disturb sheltering GCN, or obstruct access to their resting place
- Keep, transport, sell or exchange, or offer for sale or exchange any live or dead GCN, any part of GCN or anything derived from GCN

Penalties for offences include fines of up to £5000, plus up to six months imprisonment, for each offence committed.

GCN are also protected by the Protection of Animals Act 1911, which prohibits cruelty and mistreatment. Releasing a GCN in such a way as to cause undue suffering may be an offence under the Abandonment of Animals Act 1960.

In addition to the above, there are various statutory provisions relating to the transport of animals, designed to ensure their welfare. GCN are also listed under Section 41 of the NERC Act (see bats section for further details).

It is important to identify the presence of GCN individuals and also to identify suitable habitat on sites so that legal obligations regarding this species can be observed. If a survey identifies the presence of GCN on the site, an assessment of the population size class is required. This can then inform a mitigation scheme, which would need to be developed in liaison with the local Natural England team, and which minimises direct threats to newts and compensates for any loss of habitat. A licence issued by Natural England is required for the legal implementation of a mitigation scheme.

A Natural England mitigation licence application requires a Mitigation Method Statement and a Reasoned Statement of Application. The Mitigation Method Statement contains details of the proposed mitigation works. The Reasoned Statement needs to provide a rational and reasoned justification as to why the

proposed development meets the requirements of the Conservation (National Habitats & c.) regulations 1994, namely Regulations 44(2)(e), (f) or (g), and 44(3)(a).

Other amphibians

More common British amphibians, such as common frog *Rana temporaria*, common toad *Bufo bufo*, smooth newt *Triturus vulgaris* and palmate newt *Triturus helveticus* are protected only by Section 9(5) of the Wildlife and Countryside Act 1981 (as amended). This section prohibits sale, barter, exchange, transporting for sale and advertising to sell or to buy.

The above named species are also listed as UK Species of Conservation Concern. Due to general declines in most British amphibian species in recent years, many local authorities require amphibian surveys as a planning condition, or as part of environmental information submitted as part of a planning application, even where the presence of GCN is ruled out.

Natterjack toad *Bufo calamita* and pool frog *Pelophylax lessonae* are also offered the same level of protection as GCN, through the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2010.

Natterjack toad, common toad and pool frog are also listed under Section 41 of the NERC Act (see bats section for further details).

Water bodies that support all five (more common) species of British amphibians in high numbers, may be afforded protection in local plans, as Sites of Importance for Nature Conservation (SINC), or a similar equivalent, for sites of local importance. A site may require statutory protection as a Site of Special Scientific Interest (SSSI).

Reptiles

Common lizard *Zootoca vivipara*, slow-worm *Anguis fragilis*, grass snake *Natrix natrix* and adder *Vipera berus* are protected under the Wildlife and Countryside Act 1981 (as amended). They are listed as a Schedule 5 species therefore part of Section 9(1) and section 9(5) apply. The Countryside and Rights of Way Act 2000 also strengthens their protection. It is offence to:

- Intentionally or recklessly kill or injure any of the species listed above
- Sell, offer, advertise or transport for sale a live or dead animal of the species listed above

If a proposed development is likely to have an impact on these reptiles the local statutory nature conservation organisation must be consulted.

Sand lizard *Lacerta agilis* and smooth snake *Coronella austriaca* receive full protection under the Wildlife and Countryside Act 1981 (as amended) and Conservation of Habitats and Species Regulations 2010. Read together, it is an offence to:

- Deliberately, intentionally or recklessly kill, injure or capture any sand lizards or smooth snakes
- Deliberately, intentionally or recklessly disturb sand lizards or smooth snakes in such a way to be likely to significantly affect:
 - their ability to survive, breed, reproduce, rear or nurture their young
 - their ability to hibernate or migrate
 - their local distribution or abundance
- Deliberately, intentionally or recklessly take or destroy the eggs of such an animal
- Damage or destroy breeding sites or resting places of such animals
- Intentionally or recklessly disturb sheltering sand lizards or smooth snakes, or obstruct access to their resting place
- Keep, transport, sell or exchange, or offer for sale or exchange any live or dead sand lizards or smooth snakes, any part of such an animal or anything derived from such an animal

Penalties for offences include fines of up to £5000, plus up to six months imprisonment, for each offence committed.

All reptile species are also listed under Section 41 of the NERC Act (see bats section for further details).

Badgers

European badgers *Meles meles* and their habitat are protected under The Protection of Badgers Act 1992 and are also included on Schedule 6 of the Wildlife and Countryside Act 1981, and Appendix III of the Bern Convention. The legislation affords badgers protection against deliberate harm or injury making it an offence to:

- Wilfully kill, injure, take, possess or cruelly ill-treat a badger (or attempt to do so)
- To interfere with a sett by damaging or destroying it
- To obstruct access to, or entrance of, a badger sett
- To disturb a badger whilst it is occupying a sett

Penalties for offences include fines of up to £5000, plus up to six months imprisonment, for each offence committed.

Works that disturb badgers whilst they are occupying a sett are illegal without a licence. Disturbance can occur even without direct interference or damage to the sett in question. In general, the following activities are likely to require a licence:

- Use of heavy machinery or significant earth moving within 30m of a sett
- Use of lighter machinery (usually any wheeled vehicles) within 20m of a sett
- Any digging, chain saw use or scrub clearance within 10m of a sett

Hazel dormouse

Hazel dormice *Muscardinus avellanarius* are offered full protection through the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2010. If both national and international legislation are taken together, it is an offence to:

- Deliberately, intentionally or recklessly kill, injure or capture dormice
- Deliberately, intentionally or recklessly disturb dormice in such a way to be likely to significantly affect:
 - their ability to survive, breed, reproduce, rear or nurture their young
 - their ability to hibernate or migrate
 - their local distribution or abundance
- Damage or destroy breeding sites or resting places of dormice
- Intentionally or recklessly disturb sheltering dormice, or obstruct access to their resting place
- Keep, transport, sell or exchange, or offer for sale or exchange any live or dead dormouse, any part of a dormouse or anything derived from a dormouse

Penalties for offences include fines of up to £5000, plus up to six months imprisonment, for each offence committed.

Dormice are also listed under Section 41 of the NERC Act (see bats section for further details).

Bats

In the United Kingdom, all species of bat and their roosts are afforded full protection under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2010 (known as the "Habitats Regulations"). The Wildlife and Countryside Act is the domestic implementation of the Convention on the Conservation of European Wildlife and Natural Habitats (the Bern Convention) and was amended by the Countryside and Rights of Way Act 2000. This makes it an offence to:

- Deliberately, intentionally or recklessly kill, injure or capture a bat

- Deliberately, intentionally or recklessly disturb a bat while it is occupying a structure or place that it uses for shelter or protection
- Deliberately, intentionally or recklessly damage, destroy or obstruct access to any place that a bat uses for shelter or protection (even if the bat is not present at the time)
- Keep, transport, sell or exchange, or offer for sale or exchange any live or dead bat, any part of a bat or anything derived from a bat

Under UK law, a bat roost is *any structure or place which any wild [bat] ... uses for shelter or protection*. As bats often reuse the same roosts, legal opinion is that a roost is protected whether or not the bats are present at the time of the activity taking place.

Penalties for offences include fines of up to £5000, plus up to six months imprisonment, for each offence committed.

If an activity is likely to result in any of the above offences, a licence can be applied for to derogate from the protection afforded. These licences must provide appropriate mitigation and are issued by Natural England.

A Natural England mitigation licence application requires a Mitigation Method Statement and, in many cases, a Reasoned Statement of Application. The Mitigation Method Statement contains details of the proposed mitigation works. The Reasoned Statement needs to provide a rational and reasoned justification as to why the proposed development meets the requirements of the Conservation (National Habitats & c.) regulations 1994, namely Regulations 44(2)(e), (f) or (g), and 44(3)(a).

The Natural Environment and Rural Communities (NERC) Act 2006 lists the following bat species as species of principle importance under Section 41:

- Barbastelle *Barbastella barbastellus*
- Bechstein's bat *Myotis bechsteinii*
- Noctule *Nyctalus noctula*
- Soprano Pipistrelle *Pipistrellus pygmaeus*
- Brown Long-eared bat *Plecotus auritus*
- Greater Horseshoe *Rhinolophus ferrumequinum*
- Lesser Horseshoe *Rhinolophus hipposideros*

Section 40 requires every public body in the exercising of its functions 'have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity' (all biodiversity and not just section 41 species and habitats); therefore making these bats a material consideration in the planning process and requiring a detailed ecological bat survey before planning permission can be granted.

Birds

All wild birds, their nests and young are protected throughout England and Wales by the Wildlife & Countryside Act 1981 (as amended). It is illegal to kill, injure or take any wild bird, or damage or destroy the nest or eggs of breeding birds. The legislation applies to all bird species, common and rare.

In addition to the protection afforded to all wild birds, more vulnerable species listed on Schedule 1 of the Act receive enhanced protection when breeding. Schedule 1 species, including their dependent young, are protected from intentional or reckless disturbance whilst at or near the nest, in addition to the protection afforded the more common species.

The NERC Act offers further protection to the nests of some species that regularly re-use their nests, even when the nests are not in use.

The leading governmental and non-governmental conservation organisations in the UK have reviewed the population status' of 244 UK bird species. "Birds of Conservation Concern 4: the Red List for Birds" is the most recent publication summarising their findings. Three lists, Red, Amber and Green, have been produced based on the most up-to-date evidence available and criteria include conservation status at global and European levels and, within the UK: historical decline, trends in population and range, rarity,

localised distribution and international importance. These lists are a valuable resource when considering conservation priorities.

Trees

Trees may be protected on an individual or group level through a Tree Preservation Order (TPO). In order to carry out works to trees with a TPO, prior written consent must be obtained from the Local Planning Authority. Trees may also be protected through a condition of planning consent or designated conservation areas.

Hedgerows

The Hedgerow Regulations are made under Section 97 of the Environment Act 1995 and came into operation on 1st of June 1997. They aim to protect important hedgerows in the countryside by controlling their removal through a system of notification to the Local Planning Authority.

A hedgerow can only be considered for classification as “important” if it, or the hedgerow of which the section belongs to is over 20m in length (or which meets a hedgerow at either end) and has existed for 30 years or more.

Invasive plant species

A number of invasive, non-native plant species are listed under Schedule 9 (Part II) of the Wildlife and Countryside Act 1981 (as amended). The most commonly encountered listed species in ecological surveys are Japanese knotweed *Fallopia japonica*, giant hogweed *Heracleum mantegazzianum* and Himalayan balsam *Impatiens glandulifera*. Section 14(2) of this Act makes it an offence to *plant or otherwise cause to grow in the wild* any plant listed on Schedule 9 (Part II). These provisions are necessary to prevent the establishment of non-native species which may be detrimental to our native wildlife.

Soil or plant material contaminated with non-native and invasive plants can cause ecological damage and may be classified as controlled waste. It is an offence to keep, treat or dispose of waste that could harm the environment or human health. If there is any doubt, contact the local authority or Environment Agency.

Otters

European otter *Lutra lutra* are offered full protection through the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2010. If both national and international legislation are taken together, it is an offence to:

- Deliberately, intentionally or recklessly kill, injure or capture otters
- Deliberately, intentionally or recklessly disturb otters in such a way to be likely to significantly affect:
 - their ability to survive, breed, reproduce, rear or nurture their young
 - their ability to migrate
 - their local distribution or abundance
- Damage or destroy breeding sites or resting places of otters
- Intentionally or recklessly disturb sheltering otters, or obstruct access to their resting place
- Keep, transport, sell or exchange, or offer for sale or exchange any live or dead otter, any part of an otter or anything derived from otter

Penalties for offences include fines of up to £5000, plus up to six months imprisonment, for each offence committed.

Otters are also listed under Section 41 of the NERC Act (see bats section for further details).

Water voles

Water voles *Arvicola amphibius* are protected by the provisions of Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). This makes it an offence to:

- Intentionally kill, injure or take water vole
- Possess or control live or dead water vole or any part of a water vole
- Intentionally or recklessly damage destroy or obstruct access to any structure or place which a water vole uses for shelter or protection, or disturb water vole using such a place
- Sell, offer, advertise or transport live or dead water voles for sale

Licences are available from Natural England to allow activities that would otherwise be an offence, including:

- Scientific or educational purposes
- For the purposes of ringing or marking
- Conserving wild animals or introducing them into particular areas
- Preserving public health or public safety
- Preventing the spread of disease
- Preventing serious damage to any form of property or to fisheries

Penalties for offences include fines of up to £5000, plus up to six months imprisonment, for each offence committed.

Water voles are also listed under Section 41 of the NERC Act (see bats section for further details).

White-clawed crayfish

White-clawed crayfish *Austropotamobius pallipes* are protected under the Wildlife and Countryside Act 1981 (as amended). They are listed as a Schedule 5 species therefore part of Section 9(1) and section 9(5) apply. The Countryside and Rights of Way Act 2000 also strengthens their protection. It is offence to:

- Intentionally or recklessly kill or injure white-clawed crayfish
- Sell, offer, advertise or transport for sale a live or dead white-clawed crayfish

If a proposed development is likely to have an impact on white-clawed crayfish then the local statutory nature conservation organisation must be consulted.

Penalties for offences include fines of up to £5000, plus up to six months imprisonment, for each offence committed.

Their inclusion on the EC Habitats Directive allows areas to be designated as Special Areas of Conservation (SAC) for the presence of white-clawed crayfish. Such a designation brings legal protection under the Conservation of Habitats Regulations 2010, this includes how the site is managed and what development can occur on and in proximity to these sites.

White-clawed crayfish are also listed under Section 41 of the NERC Act (see bats section for further details).

Planning policy

National Planning Guidance is issued in the form of the National Planning Policy Framework 2012 (NPPF). The most relevant section is *11. Conserving and enhancing the natural environment*.

Key relevant principles stated in *11. Conserving and enhancing the natural environment* are;

- 109 The planning system should contribute to and enhance the natural and local environment by:
- Protecting and enhancing valued landscapes, geological conservation interests and soils

- Recognising the wider benefits of ecosystem services
- Minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitments to halt the overall decline in biodiversity, including establishing coherent ecological networks that are more resilient to current and future pressures

117 To minimise impacts on biodiversity and geodiversity, planning policies should:

- Plan for biodiversity at a landscape-scale across local authority boundaries
- Identify and map components of the local 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 local partnerships for habitat restoration or creation
- Promote the preservation, restoration and re-creating of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets

118 When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

- Development proposals where the primary objective is to conserve or enhance biodiversity should be permitted
- Opportunities to incorporate biodiversity in and around developments should be encouraged