

PRELIMINARY ECOLOGICAL APPRAISAL with PRELIMINARY ROOST ASSESSMENT (inc. THIRD-PARTY DATA SEARCH)

HADSCAL LAND, BRECON ROAD, HAY-ON-
WYE, HEREFORD, HR3 5DY

for

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CONTROL SHEET

HADSCAL

HADSCAL Land, Brecon Road, Hay-on-Wye, Hereford, HR3 5DY **Preliminary Ecological Appraisal with Preliminary Roost Assessment**

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TABLE OF CONTENTS

CONTROL SHEET	1
1. RECOMMENDATIONS	3
2. RESULTS	6
2.1 Overview	6
2.2 Designated Sites	6
2.3 Protected / Notable Habitats	8
2.4 Protected / Notable Species	8
3. DISCUSSION & CONCLUSIONS	14
3.1 Designated Sites	14
3.2 Protected / Notable Habitats	15
3.3 Protected / Notable Species	15
4. ANNEXES	21
4.1 Photographs	22
4.2 Plans	25
4.3 Survey & Third-party Data	29
4.4 Survey Objectives	33
4.5 Limitations	33
4.6 Methods	34
4.7 References & Bibliography.....	38
4.8 Legislation & Best Practice	44
5. QUALIFICATIONS & EXPERIENCE	52

1. RECOMMENDATIONS

No works should be undertaken which could damage or otherwise alter the habitats on the Site until additional habitat assessments have been completed.

1. Night-time bat walkover (NBW) survey work will be required to establish the level of bat activity within the Site, following the latest bat survey guidelines (Collins, 2023). Lesser horseshoe bat day roosts and hibernation roosts have been recorded as present within the surrounding habitat. One transect will cover the Site. For sites classified as having '*moderate suitability habitat for bats*', one activity survey should be undertaken per season, per transect, by appropriately experienced ecologists: spring (April-May), summer (June-August) and autumn (September-October). The transect surveys will be supported by three static recording devices per transect, which will be left in place for 5 consecutive nights of recording per month (April – October).
2. Once the development proposals are confirmed, and notwithstanding the results of the further survey work, a detailed Ecological Mitigation & Enhancement Strategy will be written and agreed with the Local Planning Authority. The strategy will ensure that the future development of the Site minimises the impact upon protected / notable species and contributes towards local and national ecological targets. The Ecological Mitigation & Enhancement Strategy **must** include a Reasonable Avoidance Measures Method Statement for reptiles, along with mitigation and enhancement strategies for birds, bats, small mammals and invertebrates. A post-developed Site visit **must** be undertaken by an appropriately experienced ecologist to formally sign-off the completion of the ecological enhancement measures, recommended within the Ecological Mitigation & Enhancement Strategy.
3. A Stage 2 (Appropriate Assessment) Habitat Regulations Assessment (HRA) is indicated, based on the Site's close proximity to the River Wye SAC (c.450m north of the Site). The applicant will be required to provide sufficient information to allow the competent authority to determine how any adverse

impacts will be mitigated. This may include a suitable drainage strategy, for example. A 'Shadow HRA' may therefore be required to determine if, with appropriate mitigation and protective measures, there will be any adverse effect on the integrity of the identified SAC, in view of its conservation objectives (alone or in combination with other projects and plans). The Local Planning Authority should be consulted to agree the extent of any additional information required to inform the assessment.

4. The Site lies within one impact buffer zone (River Wye SSSI), which is located c.450m north of the Site. The Site falls under the following flagged category: infrastructure. Therefore, consultation by the Local Planning Authority with Natural Resource Wales / Natural England as appropriate is indicated for the identified site.
5. A Construction Environmental Management Plan (CEMP) should be produced for the Site to ensure that the wider environment, specifically the nearby designated site (*i.e.* River Wye / Afon Gwy), is protected against potential pollutants during the construction phase. The plan should cover transport, material handling / storage, spills and discharges, noise, dust, and light as well as any additional environmental considerations and mitigation measures.
Note: this has been completed by Focus Environmental Consultants (Focus Environmental Consultants, 2026b)
6. The mitigation hierarchy must be implemented regarding night lighting. A 'no light approach' should be followed unless there is a justifiable need for lighting. If artificial lighting is required during the construction phase and / or post-development, it **must** be minimal and low-level. A lighting plan should be designed in collaboration with an ecologist to prevent unnecessary illumination of wildlife habitats. The results of the night-time bat walkover survey work will aid with understanding important foraging and commuting routes onsite.

7. Existing mature trees and hedgerows should be retained within the development scheme. All retained trees and hedgerows should be afforded adequate protection in line with '*BS5837: 2012 Trees in relation to design, demolition and construction*'.
8. Vegetation within the development footprint should be maintained short (c.50mm) to prevent it from becoming suitable for vertebrate fauna.
9. Any removal of potential bird nesting habitat should be undertaken outside the bird nesting season (March – August inclusive) or otherwise under the direction of a suitably qualified ecologist.

2. RESULTS

2.1 Overview

Focus Environmental Consultants was commissioned by HADSCAL (Hay & District Sports and Community Association Limited) ('the Client') to undertake a Preliminary Ecological Appraisal and Preliminary Roost Assessment of HADSCAL Land, Brecon Road, Hay-on-Wye, Hereford, HR3 5DY (centred on Ordnance Survey grid reference SO 22818 41840) ('the Site'). This was accompanied by a third-party data search (2km search radius) from Aderyn Local Environmental Records Centre.

The Site was surveyed by an ecological consultant from Focus Environmental Consultants on 27 March 2026. It is understood that the development proposals are for sport and health facilities including additional car parking, wildlife area and multi-sports court.

The Site is c.1.6ha in size and comprises mown modified grassland, sparsely vegetated urban land, scattered trees and native hedgerow.

Tree and hedgerow numbers taken from the arboricultural survey report (Focus Environmental Consultants, 2026a).

2.2 Designated Sites

The third-party data search and a review of the Multi-Agency Geographic Information for the Countryside (MAGIC) service has identified five sites designated under the National Site Network (previously referred to as European designated Natura 2000 sites), located within 20km of the Site.

Three statutory designated sites are located within 2km of the Site.

The third-party data search has identified nine non-statutory designated sites within 2km of the Site, comprising NRW Priority Area (woodland – PAWS), Cusop Dingle, Hen Allt Common, Twyn-y-beddau Lane, and Wyeseid Hay. Sites identified within 1km of the Site are included within Table 1 below.

Table 1: Designated Sites

Site Name and Designation ¹	Distance (km) and bearing from the Site	Description
National Site Network Sites – within 20km		
River Wye / Afon Gwy SAC	c. 450m north-west	Selected for water courses with characteristic bryophyte-dominated vegetation and lower reaches with extensive Ranunculus beds. Also selected for Annex II species such as White-clawed crayfish, Lamprey, Atlantic salmon and Otter.
Rhos Goch SAC	c. 7km north-west	A sequence of mire communities developed in a flat valley floor. The site was selected for it's raised bogs that grade into an extensive suite of poor-fen and swamp communities. Also selected for its transition mires and quaking bogs (Annex I habitat)
River Usk SAC	c. 13.8km south	Water courses of plain to montane levels with water crow-foot vegetation, selected for the presence of Sea, Brook and River lamprey (Annex II species) as well as Atlantic salmon, Twaite shad, Bullhead and Otter.
Drostre Bank SAC	c. 16.7km south-west	Molinia meadows on calcareous, peaty soils. Selected for its species-rich example of fen-meadow, with well-displayed transitions to a floristically related form of rush-pasture as well as to base-rich wet woodland.
Llangorse Lake SAC	c. 17.4km south-west	A natural eutrophic lake of glacial origin, flora dominated by pondweed, yellow water-lily with shorelines a good example of club rush.
Statutory Designated Sites – within 2km		
River Wye / Afon Gwy SSSI	c. 460m north-west	Rocky sections excellent examples of medium to large rivers with moderate nutrient status including vegetation dominated by water crowfoot. The riverside rocks support a variety of rare and scarce plants and a variety of shingle dwelling invertebrates.

¹ SAC= Special Area of Conservation, LNR= Local Nature Reserve, LWS= Local Wildlife Site, RIGS= Regionally Important Geological/Geomorphological Site

Site Name and Designation ¹	Distance (km) and bearing from the Site	Description
Hen-allt Common SSSI	c. 1.7km south	The area comprises of a woodland and common land that is designated for it's unimproved grassland Flat-sedge and Meadow Saffron.
Pen-yr-hen-Allt SSSI	c. 2km south	No description available.
Non-Statutory Designated Sites – within 2km		
Cusop Dingle RIGS	c. 506m east	No description available.

2.3 Protected / Notable Habitats

2.3.1 Hedgerows / Gwrychoedd²

Hedgerow H19, H30 is considered to meet the environmental criteria (BRIG (ed. Ant Maddock), 2008) to qualify as a habitat '*...of principal importance for the purpose of maintaining and enhancing biodiversity in Wales*', under Section 7 of the Environment (Wales) Act 2016. A full appraisal of the qualification of hedgerows as '*important*' under the Hedgerows Regulations (1997) is outside the scope of this survey. However, hedgerow H19, H30 could not be defined as '*species-rich*'³. H30 is likely older than 30 years.

2.4 Protected / Notable Species

2.4.1 Bats / Ystlumod

The third-party data search has identified 101 records of bats within the 2km search area. Species include common pipistrelle, soprano pipistrelle, lesser and greater horseshoe bats, Daubenton's Bat, noctule and brown long-eared bats. The closest of which is a noctule c.177m north-east of the Site. The closest horseshoe bat is a lesser horseshoe bat c.472m north of the Site, which is identified as a day roost. C.475m north is another lesser horseshoe bat record, which is identified as a day roost and hibernation roost using a wine cellar. The most recent horseshoe bat record is c.1065m north-west of the Site in 2025, which is identified as a lesser horseshoe bat hibernation roost within a culvert.

² to qualify as a Priority Habitat, hedgerows must predominately (e.g. 80%) consist of at least one UK native woody species and be over 20m in length.

³ Species rich hedgerows are those containing at least five woody native species within a 30m section (Defra, 2007).

The Site contains four built structures including metal storage containers (B1, B4) and two buildings associated with the football pitch adjacent to the Site.

Table 2: Preliminary Roost Assessment of Structures⁴

Structure Reference	Potential Suitability (Bat Roosting Habitats in Structures)	Potential Suitability (Hibernation)
B1	None	None
B2	Negligible	None
B3	Negligible	None
B4	None	None

Two mature trees present on / adjacent to the Site contain Potential Roost Features (PRFs), which could be exploited by roosting bats.

Table 2: Ground-Level Tree Assessment (GLTA) - summary⁵ of the Site.

Tree Reference	Potential Suitability (Bat Roosting Habitats in Trees)
T28	FAR
T31 (offsite)	PRF

The boundary hedgerow (H30) and mature trees and line of trees within the Site provide suitable foraging and commuting habitat for bats. The Site lies on the edge of a sub-urban landscape and is surrounded by pasture and arable land to the west, south and east, with the River Wye located c.450m to the north. Additional habitat features in the wider landscape include mature hedgerows and tree lines, Login Brook c.230m west, fragmented woodland blocks to the north, mature woodland blocks to the south, and residential and commercial development to the immediate north and east. However, the Site is currently used as a football pitch, with a total of eight floodlights currently present within the immediate surrounding area. These lights will likely have a curfew and will be turned off past a certain time. The details of the light fixtures currently present onsite are unknown.

⁴ Definitions as per Collins, 2023.

⁵ Definitions as per Collins, 2023.

As such the habitats on the Site are of 'Moderate' potential suitability for foraging and commuting bats, with reference to published best practice guidelines (Collins, 2023).

2.4.2 Great Crested Newts / Madfall ddwr gribog

The third-party data-search has returned one record of great crested newts within the search area. The closest of which is c.1.97km north-west of the Site.

There are no suitable breeding habitats for amphibians at the Site.

There are no lentic waterbodies mapped on Ordnance Survey within 250m of the Site.

The habitats within the Site offer largely sub-optimal habitat for amphibians, such as great crested newts, during their terrestrial phases due to the predominance of mown grassland lacking suitable areas of cover and shelter. Opportunities are associated with the area of rough grassland to the north of the Site, hedgerow bases, compost piles (Target Note 1 (TN1)), Brash piles (TN2, TN3, TN4, TN5) and rubble piles (TN6, TN7)

2.4.3 Birds / Adar

A variety of bird species were recorded incidentally during the site visit and are listed within Table 3, below.

Table 3: bird species recorded (heard and / or seen) at the Site.

Species	WACA 1981 Schedule 1 ⁶	Section 7 ⁷	Conservation Status (BoCC5) ⁸
Blackbird	-	-	Green
Robin	-	-	Green
Jackdaw	-	-	Green
Chiffchaff	-	-	Green
Goldfinch	-	-	Green
Carrion crow	-	-	Green
Woodpigeon	-	-	Amber

⁶ Schedule 1 of the Wildlife and Countryside Act, 1981 (as amended).

⁷ Section 7 of the Environment (Wales) Act, 2016

⁸ Birds of Conservation Concern 5 (Stanbury *et al.*, 2021).

Skylark	-	Priority Species	Red
Greenfinch	-	Priority Species	Red
House sparrow	-	Priority Species	Red

The mature hedgerows and trees within the Site provide suitable nesting and foraging habitat for passerine birds. The Site has some limited value for wintering birds, primarily associated with hedgerow H30; however, the suitability of this feature is reduced due to frequent management. Overall, the Site is considered to have negligible value for wintering birds. The Site is unsuitable for ground-nesting birds.

2.4.4 Reptiles / Ymlusgiaid

The third-party records search has returned the following records of reptiles from the specified search-area: slow-worm and grass snake. The closest record is a slow-worm, c.290m north of the Site.

The Site supports a limited variety of structurally-heterogeneous habitats, including tall grass, hedgerow bases, refugia and bare south-facing areas for basking, which could support common reptiles. It must be noted that all of these habitats are limited in extent.

2.4.5 Hazel Dormice / Pathew

The third-party data search has returned 58 hazel dormice records from within the search area. The nearest record is c.695m north-west of the Site.

The Site contains small areas of suitable hazel dormouse habitat including hedgerow H30 and the mature tree-lines. However, these are small, geographically isolated and do not support a sufficient variety of fruit and nut-bearing species to support the foraging requirements of hazel dormice throughout the year. Furthermore, the development proposals viewed to date retain hedgerow H30. The Site does not contain woodland habitat, nor is there a woodland habitat connected to the Site.

2.4.6 Badgers / Mochyn daear

The third-party data search has returned 14 badger records from within the search area. The nearest record is c.500m from the Site.

No setts or evidence of badger activity (latrines, snuffle holes, tracks *etc.*) was observed within the Site boundaries. However, it is likely that this abundant mustelid is present within the wider landscape and may use the Site for foraging purposes.

2.4.7 Riparian Mammals / Dyfrgi & Llygoden y dŵr

The third-party data search has returned 24 Otter records from within the search area. The nearest record is c.730m north of the Site.

The Site has no suitable habitats for riparian mammals such as otter, water vole or water shrew.

2.4.8 Other Notable Mammals / Mamaliaid

The Site offers some foraging opportunities for mammals typical of a suburban environment, such as hedgehog, fox, field vole and small mustelid species, *e.g.*, weasel and stoat. The third-party data search has returned records of Hedgehog, Stoat, Mink within 1km of the Site. The hedgehog, brown hare, polecat, harvest mouse, pine marten listed as a '*Priority Species*' under Section 7 of the Environment (Wales) Act 2016.

2.4.9 Invertebrates / Anifeiliaid Di-asgwrn-cefn

The third-party data search has returned 18 records of notable (Schedule 5, Section 7) invertebrates from within the search area. The nearest notable record is a Black Oil-beetle c.500m east of the Site. The Site coincides with a mapped Buglife 'B-Lines' (see [B-Lines - Buglife](#)).

A full assessment of the invertebrate assemblage at the Site is beyond the scope of this survey. No triggers were identified to indicate that the Site supports interesting, legally-protected or notable terrestrial invertebrates, however.

2.4.10 Notable Plants / Planhigion fasgwlaidd

The third-party data search has returned 23 records of notable plants.

No plants listed under Schedule 8 of the Wildlife and Countryside Act 1981 (as amended) or listed as a species '*...of principal importance for the purpose of maintaining and enhancing biodiversity in Wales*', under Section 7 of the Environment (Wales) Act 2016, were recorded on the Site.

2.4.11 Invasive Species

The third-party data search has returned 99 records of invasive species.

No legally-notifiable plant species listed under Schedule 9 Part II of the Wildlife and Countryside Act 1981 (as amended) were recorded within the Site (e.g., Japanese knotweed, giant hogweed, Himalayan balsam, wall cotoneaster).

3. DISCUSSION & CONCLUSIONS

The client is currently seeking full planning permission for sport and health facilities including additional car parking, wildlife area and multi-sports court. This report and discussion are based on the following plan provided by the architect: Draft Development Plan HCC P01B. The following have been identified which may represent constraints or opportunities within a future development at the Site.

3.1 Designated Sites

3.1.1 National Site Network

River Wye / Afon Gwy SAC is located approximately c.450m to the north of the Site. The primary reason for selection of this site as a SAC is because Annex II species such as White-clawed crayfish, Lamprey, Atlantic salmon and Otter are present.

When applying The Conservation of Habitats and Species Regulations 2017 (as amended), the Local Planning Authority has an obligation to ensure that no plans or projects have an adverse effect upon the integrity of sites designated under the National Site Network within the area. Given the close proximity of the Site to the SAC, this indicates that the proposals for this Site are expected to give rise to a '*likely significant effect*' on the River Wye SAC alone or in combination with other plans / projects. As such, it is likely that recourse to Stage 2 (Appropriate Assessment) of the Habitats Regulations Assessment will be required. The applicant will be required to provide sufficient information to the competent authority to determine how any adverse impacts will be mitigated. A 'Shadow HRA' may therefore be required to determine if, with appropriate mitigation and protective measures, there will be any adverse effect on the integrity of the identified SAC, in view of its conservation objectives (alone or in combination with other projects and plans).

3.1.2 Other Statutory Sites

The Natural England SSSI Impact Risk Zones (IRZs), used to assess planning applications for likely impacts on SSSIs in England, were consulted via the government's multi-agency website MAGIC. Although the Site is located within Wales, the IRZ associated with the River Wye / Afon Gwy SAC/SSSI extends across the England–Wales border and encompasses the Site. The Site is therefore located within

the mapped risk zone for the River Wye / Afon Gwy SSSI. The proposed development falls under the following flagged category: *'Infrastructure: Pipelines and underground cables, pylons and overhead cables (excluding upgrades and refurbishment of existing network). Any transport proposal including new or extended footways, cycleways, roads/car parks, railways and waterways (excluding routine maintenance). Airports, helipads and other aviation proposals'*. Therefore, consultation by the Local Planning Authority with Natural Resources Wales and, where appropriate, Natural England may be required due to the potential for cross-border effects on the designated site.

3.1.3 Non-statutory Sites

One non-statutory wildlife site lies within 1km of the Site. However, given the character, scale and degree of physical separation between the prospective development Site and the non-statutory site, it is considered highly unlikely that future development will adversely impact on the functionality or integrity of the site or affect its conservation status, provided that standard construction procedures are followed during the works.

3.2 Protected / Notable Habitats

3.2.1 Hedgerows / Gwrychoedd

The development proposals viewed to date show there will be no loss to hedgerows present onsite.

3.3 Protected / Notable Species

It is now rare for Local Planning Authorities to condition further survey work to determine the presence or absence of legally protected species, in line with published guidelines. Conversely, developers should not be required to undertake surveys for legally protected species which are unlikely to be present on site or otherwise unlikely to be significantly affected by development proposals:

"It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. It is considered best practice that such a survey is carried out before planning application is submitted. Planning permission

should not be granted subject to a condition that protected species surveys are carried out and, in the event that protected species are found to be present, mitigation measures are submitted for approval.

However, bearing in mind the delay and cost that may be involved, developers should not be required to undertake surveys for protected species unless there is a reasonable likelihood of them being present. However, the level of likelihood that should trigger a requirement for developers to undertake surveys should be low where there is a possibility that European protected species might be present. It is considered best practice that such screening should be carried out by a competent ecologist on the basis of data provided by the relevant Local Record Centre(s).

Where a survey is required by the authority, the survey should be completed and any necessary measures to protect the species should be in place, through conditions and/or planning obligations, before the permission is given. In appropriate circumstances, the permission may also impose a condition preventing the development from proceeding without the prior acquisition of a licence under the appropriate wildlife legislation.” (see Planning Policy Wales, Technical Advice Note 5, paragraph 6.2.2).

3.3.1 Bats / Ystlumod

The survey work completed to date has identified several Potential Roost Features (PRFs) for bats within mature trees (T28, T31) on / adjacent to the Site. However, these features will be retained under the current development proposals. Therefore, it is considered reasonably *unlikely* that any offence under wildlife law will result from the development proposals, subject to standard mitigation requirements being formally implemented. Therefore, based on the development proposals received to date, recourse to further presence/absence survey work is not considered necessary to inform a planning decision, in line with government guidance.

The habitats on Site and within the immediate surrounding landscape are considered to offer ‘Moderate’ potential for foraging and commuting bats (with reference to Collins, 2023). Artificial lighting along flight paths, such as along hedgerows, tree-lines etc., can create barriers that many species cannot cross, especially slower-flying species

such as *Plecotus*, *Rhinolophus* and *Myotis* sp. (Fure, 2012). The addition of new commercial buildings, sports facilities and car parks, will introduce additional night-lighting to the area. Furthermore, the closest horseshoe bat record is a lesser horseshoe bat c.472m north of the Site (day roost). The full extent of artificial night-lighting at the Site is unknown at this juncture but has the potential to result in significant adverse impacts on foraging and commuting bats and may give rise to offences under wildlife legislation. Furthermore, a section of LOT1 will be removed within the development proposals.

It is not possible to confirm the likely extent of development impacts on foraging bats without recourse to more detailed bat transect survey work. Please refer to the Recommendations section, above for details of how these bat activity surveys should be completed to comply with industry-approved best practice (Collins, 2023) and provide a robust assessment for planning purposes. Unless development proposals can be shown to avoid impacts on foraging bats, these bat activity surveys should be completed *prior* to planning determination, in line with government guidance (ODPM Circular 06/2005. Paragraph 99).

The Site is outside of all lesser horseshoe and greater horseshoe bat buffer zones including breeding sites and hibernation sites associated with the Wye Valley and Forest of Dean Bat SAC (Forest of Dean District Council, 2021).

3.3.2 Great Crested Newts / Madfall ddwr gribog

Due to a lack of breeding habitat on the Site and the absence of waterbodies and third-party records within 250m of the Site⁹, the likelihood of great crested newts being present and impacted upon by the proposed development is negligible. Recourse to further presence/absence survey work is therefore not required to inform a planning decision in line with government guidance (see ODPM Circular 06/2005. Paragraph 98).

⁹ Research suggests that the majority of great crested newts stay within 50m of a pond, with very few exceeding 100m (Cresswell & Whitworth, 2004).

3.3.3 Birds / Adar

Based on the development proposals viewed to date, it is considered unlikely that breeding or non-breeding birds will be significantly impacted by the proposed scheme. Therefore, recourse to further detailed survey work is not required to inform a planning decision in line with government guidance (see ODPM Circular 06/2005. Paragraph 98).

This assumption is based on the following factors:

- Required clearance of potential nesting habitat can be timed and undertaken sensitively to ensure compliance with the relevant wildlife legislation.
- The majority of suitable nesting and foraging habitats on Site are being retained and connectivity to the wider landscape is being maintained. Bird habitats will be protected during the construction phase and can be enhanced through new tree / shrub planting with suitable native species.
- The development proposals are for a commercial scheme, which is unlikely to result in an increase in domestic predators at the Site (*i.e.* cats) which can directly impact nesting and foraging birds.
- Industry-recognised mitigation and enhancement measures can be secured within an Ecological Mitigation and Enhancement Scheme (EMES). Suitable enhancements would include bespoke species-interventions, such as provision of bird nesting boxes.

3.3.4 Reptiles / Ymlusgiaid

Based on the presence of suitable reptile habitats, proximity of third-party records, and connectivity to suitable off-site habitat, it is possible that reptiles may be present on the Site. However, it is considered reasonably unlikely that reptile populations (if present) will be significantly impacted, based on the development proposals and plans provided to date. This judgement is based on the proposed retention and continued ecological functionality of all hedgerows identified within the survey Site. Furthermore, the surrounding habitats (*i.e.* pasture fields, hedgerows, tree-lines) remain in-tact and functional. Accordingly, it would be unreasonable to undertake expensive and time-consuming presence/ absence surveys for reptiles when the predicted impacts are likely to be small (no more than site level). Industry-recognised mitigation measures

(Reasonable Avoidance Measures Method Statement) secured within the framework of an Ecological Mitigation and Enhancement Strategy (EMES) can provide confidence in compliance with wildlife legislation. Features that must be checked by a suitably qualified ecologist prior to removal under the Reasonable Avoidance Measures Method Statement include compost piles (Target Note 1 (TN1)), Brash piles (TN2, TN3, TN4, TN5) and rubble piles (TN6, TN7). The partial removal of LOT1 must also be checked by a suitably qualified ecologist prior to removal.

3.3.5 Hazel Dormice / Pathew

Due to a lack of suitable habitat on the Site, the likelihood of hazel dormice being present and affected by the proposed development is negligible. Recourse to further presence/absence survey work is therefore not required to inform a planning decision in line with government guidance.

3.3.6 Badgers / Mochyn daear

No setts or evidence of badger activity was observed within the survey boundary and good access was obtained to all areas of the Site. At this juncture it can be said with some confidence that the development proposals will not give rise to any licensable impact on badgers.

3.3.7 Riparian Mammals / Dyfrgi & Llygoden y dŵr

The Site lacks any suitable habitats for resting or breeding otters and water voles. Accordingly, the likelihood of otters and/or water voles being present and affected by the proposed development is negligible. Recourse to further presence/ absence survey work is therefore not required to inform a planning decision in line with government guidance.

3.3.8 Other Notable Mammals / Mamaliad

It is reasonable to assume small mammal species, such as hedgehogs, will use the hedgerow, tree-lines and allotment for foraging and commuting. As such, industry-recognised mitigation and enhancement measures must be secured within an Ecological Mitigation and Enhancement Scheme. Suitable mitigation would include a pre-clearance check of LOT1 (G17) and the provision of a predatory proof hedgehog nest box placed ideally within H30.

3.3.9 Invertebrates / Anifeiliaid Di-asgwrn-cefn

Due to a lack of notable habitat on the Site, the likelihood of significant invertebrate assemblages being negatively affected by the proposed development is negligible. Recourse to further detailed invertebrate survey work is therefore not required to inform a planning decision in line with government guidance (see ODPM Circular 06/2005. Paragraph 98). The development proposals provide an opportunity to derive enhancements for invertebrates, through the incorporation of nectar-rich planting, insect boxes and loggeries for example.

3.3.10 Notable Plants / Planhigion fasgwlaidd

No notable plant species were present onsite.

3.3.11 Invasive Species / Rhywogaethau ymledol

No invasive plant species were present onsite.

4. ANNEXES

4.1 Photographs

4.2 Plans

4.3 Survey & Third-Party Data

4.4 Survey Objectives

4.5 Limitations

4.6 Methods

4.7 References & Bibliography

4.8 Legislation & Best Practice

4.1 Photographs

All photographs taken on 27 March 2026



Plate 1: view of Site entrance at east of the Site.



Plate 2: view of football pitches within the centre of the Site. View of T1-T4.



Plate 3: view of allotment at the east of the Site.



Plate 4: view of compost heaps TN1.



Plate 5: view of bramble scrub and culvert at the north of the site.



Plate 6: view of football pitch lighting offsite.



Plate 7: view of B2 and B3 onsite. Negligible potential for roosting bats.



Plate 8: view of recently cleared land now recolonising.



Plate 9: view of H30 at the south of the Site.



Plate 10: view of TN5 brush pile at the east of the Site.



Plate 11: view of LOT1 at the east of the Site to be partially removed.



Plate 12: view of LOT2 offsite, partially removed / cleared.



Plate 13: view of H21 non-native hedgerow.



Plate 14: view of T28 and T31 at the west of the Site.



Plate 15: view of gap in bark of T31 (offsite). May lead into tree cavity. Identified as 'PRF'

4.2 Plans

Plans:

4.2.1 Location Plan

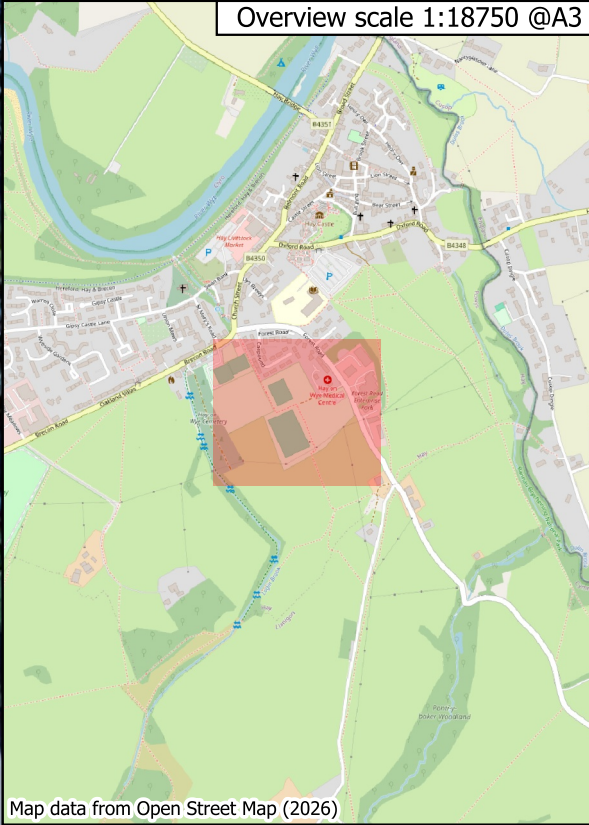
4.2.2 UK Habitat Classification Survey Plan

4.2.3 Pond Location Plan

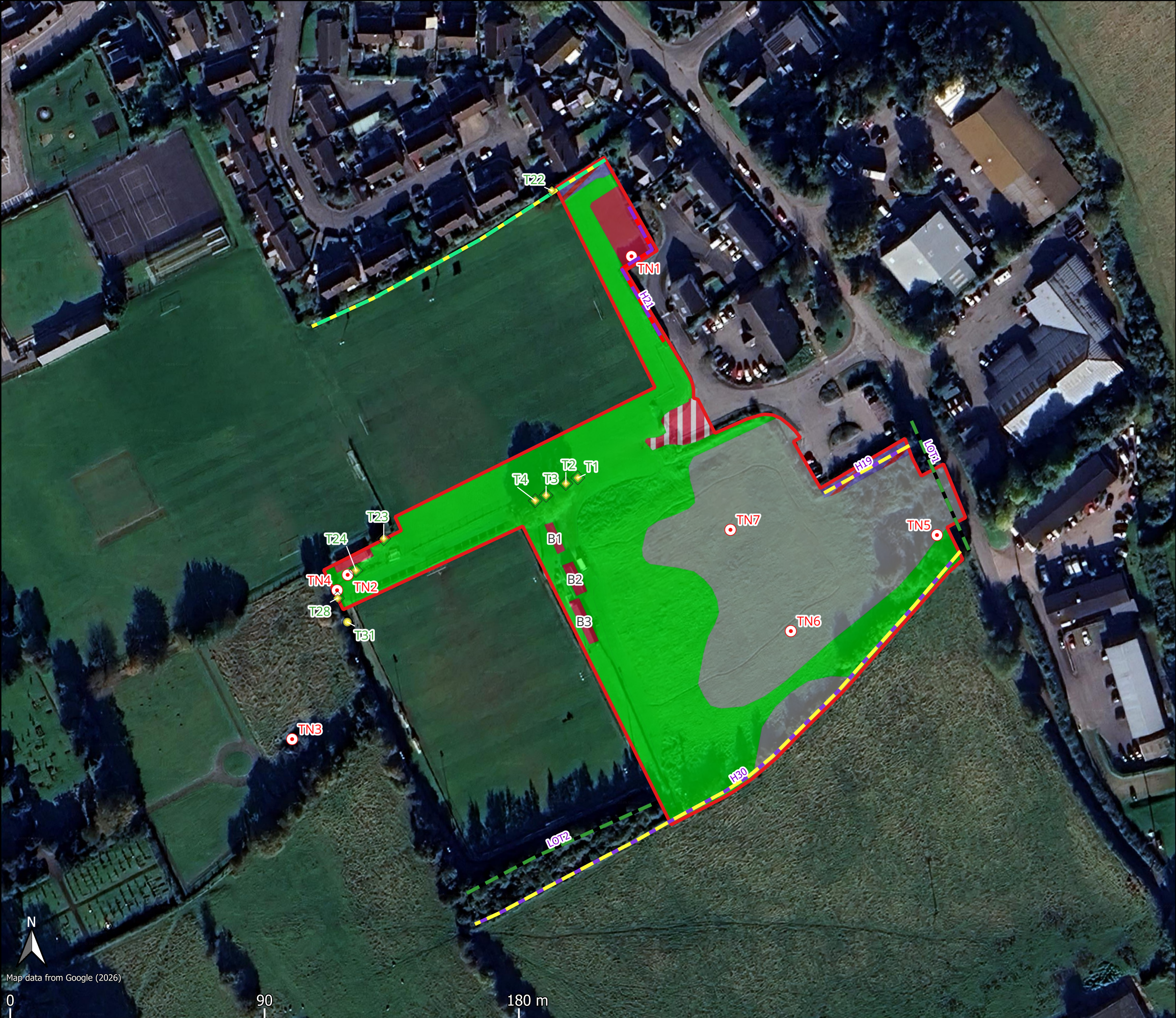


Legend

 Red Line Boundary



Title:			
4.2.1 Location Plan			
Client:			
HADSCAL			
Project:			
HADSCAL Land, Brecon Rd, Hay-on-Wye, Hereford, HR3 5DY			
V1	1:1250 @A3	Contract:	3528
Plan Author: RA		Plan Date:	Apr-2026



Legend

- Red Line Boundary
- Target Notes
- Existing Medium Urban Tree
- c616 Allotments
- h3d Bramble scrub
- (u1b) Developed land; sealed surface
- (u1b5) Buildings
- (g4) Modified grassland
- (g - 81) Ruderal/Ephemer
- (h2b) Non-native and ornamental hedgerow
- (w - 33) Line of trees
- (h2a) Native hedgerow
- (h2a6 - 50) Other native hedgerow - associated with bank or ditch
- (r - 50) Ditches

Target Note 1: compost heaps
Target Note 2: Brash pile
Target Note 3: Brash pile
Target Note 4: Brash pile
Target Note 5: Brash pile
Target Note 6: rubble pile
Target Note 7: rubble pile

4.2.2 UK Habitat Classification Survey Plan

Client: HADSCAL

Project: HADSCAL Land, Brecon Rd, Hay-on-Wye, Hereford, HR3 5DY

V1	1:1250 @A3	Contract:	3528
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Surveyor: AF	Survey Date:	27-03-2026
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Plan Author: RA	Plan Date:	23-04-2026
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Legend

- Red Line Boundary
- 250m site buffer

Pond Location Plan

Client:		HADSCAL	
Project:			
HADSCAL Land, Brecon Rd, Hay-on-Wye, Hereford, HR3 5DY			
V1	1:3000 @A3	Contract:	3528
Surveyor: AF		Survey Date:	27-03-2026
Plan Author: RA		Plan Date:	22-04-2026

4.3 Survey & Third-party Data

All surveys have been completed by appropriately qualified and experienced ecologists from Focus Environmental Consultants. Third-party data has been obtained from Aderyn Local Environmental Records Centre.

Tree and hedgerow numbers taken from the arboricultural survey report (Focus Environmental Consultants, 2026a).

Table 4: Summary of Habitat Features

UK Habitat Classification Habitat Type & Code	Size / Extent	Condition	Qualifies as Section 7 Habitat
u1b Developed land; sealed surface	0.02ha	Hardstanding comprising tarmac or building footprint.	No
g4 Modified grassland 107 Mown and collected	0.47ha	Species-poor improved grassland dominated by perennial rye-grass with few associates including white clover. Other species seen include cock's-foot, common daisy, dove's-foot crane's-bill, common cat's-ear, hawkbit, lesser celandine, dandelion sp., ribwort plantain and yarrow. The grassland was mown, with a short sward height.	No
g4 Modified grassland 520 Bare ground	0.5ha	Species-poor improved grassland dominated by Italian rye-grass. Patches of bare ground visible. Other species seen include broadleaved dock, Italian rye-grass, groundsel, spear thistle, white clover, germander speedwell, common nettle, cock's-foot, yarrow. Located near to the large area of ruderal and ephemeral vegetation. Recently cleared land.	No
h3d Bramble scrub	0.02ha	A small area of bramble scrub at the north-east of the Site. Vegetation surrounding the bramble scrub has been left unmanaged. Bramble scrub was not dense, nor relatively tall.	No

UK Habitat Classification Habitat Type & Code	Size / Extent	Condition	Qualifies as Section 7 Habitat
		Has formed on top of a culvert, which connects to a mostly dry ditch offsite. Other species seen include lesser celandine, cleavers, nettles, cow parsley, broadleaved dock.	
g81 Ruderal and ephemeral 520 Bare ground	0.65ha	A medium sized area recently cleared. Early colonising herbaceous species present including broadleaved dock, Italian rye-grass, groundsel, spear thistle, white clover, germander speedwell, common nettle, cock's-foot, yarrow, greater mulleins, dove's-foot crane's-bill, ragwort, bent sp, annual meadow grass, prickly sow-thistle, common chickweed, shepherd's-purse, red deadnettle, colt's-foot, ribwort plantain, bristly oxtongue, weld, scentless mayweed, circled dock, hedge woundwort and red clover. All vegetation is sparse and low level. Patches of bare ground present across the habitat.	No
c616 Allotments	0.03	A small area of allotments at the north-east of the Site.	No
g50 ditch	140m 3m	Two ditches. The southern ditch is present within H30 at the south of the Site. This ditch was dry at the time of the survey. The northern ditch is primarily located offsite, other than a small length.	No
h2b Non-native and ornamental hedgerow	60m	H21: A single mature non-native hedgerow comprising cherry laurel. Hedgerow forms a distinct linear feature. The hedgerow is c.3m (H) by 1m (W). Ground flora comprised lesser celandine, dove's-foot crane's-bill, cleavers, bittercress, common daisy and cock's-foot.	No
h2a Native hedgerow	33m	H19: young native hedgerow planted on a low embankment opposite the existing offsite carpark. Species seen include hawthorn and dogwood. Bramble was also present. Hedgerow is gappy and low-level. Provides minimal ecological benefits.	Yes

UK Habitat Classification Habitat Type & Code	Size / Extent	Condition	Qualifies as Section 7 Habitat
h2a Native hedgerow 50 - ditches	140m	H30: native semi-mature hedgerow along the southern boundary. Dry ditch also present. Species seen include blackthorn, hazel, holly and elder. Ground flora comprised Hart's-tongue fern, lord and ladies, common nettle, lesser celandine, and bramble. The hedgerow is c.1m (H) at the rear and 4m (H) at the front and c.1m (W). The front of the hedgerow has colonised the ruderal and ephemeral vegetation slightly. Associated with a dry ditch.	Yes
w33 Line of trees	21m	LOT1: present along the eastern boundary (G17 in the arboricultural report). Species seen include hawthorn, holm oak, field maple, holly, willow sp. and birch sp. Assumed originally planted as a hedgerow, which has been left unmanaged for a significant portion of time. C.5m (H) by 2m (W). LOT2: present offsite at the south of the site. Majority of the trees have been recently cleared, with a small number of silver birch remaining.	No
g32 Scattered trees		Various life stages including young, semi-mature, early mature and mature. Species seen include holm oak, field maple, hazel, elder, and goat willow. Please refer to the arboricultural report (Focus environmental Consultants, 2026a) for further details.	No

Table 5: Summary of Preliminary Roost Assessment

Ref:	Summary Description	Potential Roost Features	Evidence of Bats	Category (Collins 2023)
B1	A rectangle metal shipping container.	None	None	None

Ref:	Summary Description	Potential Roost Features	Evidence of Bats	Category (Collins 2023)
B2	A single-storey shipping container used as an office for the football club. The roof shape is flat and presumably comprised metal lining.	None	None	Negligible
B3	A single-storey open sided football pitch stand. Constructed of corrugated metal sheeting with a flat roof. There is no roof void present.	None	None	Negligible
B4	A rectangle metal shipping container.	None	None	None

Table 6: Summary of Ground Level Tree Assessment (GLTA)

Tree	Species & Age Category	Potential Roost Features	Evidence of Bats	Category (Collins 2023)
T28	Field maple, semi-mature	Tare in main trunk causing lifted bark which may be suitable for crevice dwelling bats.	No	FAR
T31 (offsite)	Oak, semi-mature	Larger tare-out wound in the main trunk of the tree. May lead into a larger cavity.	No	PRF

4.4 Survey Objectives

The objectives of the survey were:

1. to carry out a Preliminary Ecological Appraisal of the Site to identify any habitats, species or features of nature conservation significance;
2. to undertake a “third-party data” search to acquire details of any protected species records held by third parties and information on nature conservation designations relevant to the Site, to collate and comment upon the responses;
3. to undertake a daytime preliminary roost assessment for bats, following best practice survey guidelines (Collins, 2023; Reason & Wray, 2025);
4. to produce a concise report identifying known and likely ecological constraints associated with a project. The report will identify any additional surveys that may be required to inform an Ecological Impact Assessment (EcIA). It will also indicate mitigation measures that may be required, applying the ‘mitigation hierarchy’, to ensure compliance with wildlife law and recognised best practice. Intrinsic opportunities offered by a project to deliver ecological enhancement will be identified within the report.

4.5 Limitations

The Preliminary Ecological Appraisal was carried out by a suitably experienced ecologist from Focus Environmental Consultants. The month of survey (end of March) is within the optimal survey period for most habitats and species in Wales (JNCC, 2010).

Many fauna species become inactive and their field signs less apparent in the winter months. Similarly some plant species may also become less evident in the winter because of their annual growth pattern or natural process of die-back to roots, corms, bulbs and tubers.

The reader is reminded that an ecological survey that is based on a single site visit will typically under-represent the biological diversity of a site, owing to seasonal variations in animal activity and plant growth form. However, a Preliminary Ecological Appraisal such as this can be completed by an experienced ecologist at any time of year subject to suitable weather conditions (CIEEM, 2017a).

Preliminary Ecological Appraisals and Preliminary Roost Assessments typically have a lifespan of 12 – 18 months for planning purposes (see CIEEM, 2019). After this time has elapsed, the Local Planning Authority may require update surveys to be completed.

No significant survey limitations were encountered.

4.6 Methods

4.6.1 Third-Party Data Trawl

A third-party data trawl was conducted in March 2026, to collect any existing site records and protected/notable species data records for within the Site boundary and a 2km area around the Site. The following third-party consultees were contacted: Aderyn Local Environmental Records Centre.. The government's multi-agency website 'magic' was also consulted (www.magic.gov.uk).

4.6.2 Preliminary Ecological Appraisal

An experienced ecological consultant undertook a field survey in accordance with the Guidelines for Preliminary Ecological Appraisal (CIEEM, 2017 2nd Edition), the UK Habitat Classification system (UKHab Ltd, 2023), and the Handbook for Phase 1 Habitat Survey (JNCC, 2010). The extent of each habitat type was mapped and details of relative plant species abundance within homogenous areas were recorded. Species abundance was measured on the DAFOR scale (Dominant, Abundant, Frequent, Occasional and Rare), with the addition of the term 'Local' to describe variation on a small-scale.

Higher plant nomenclature follows Stace (4th Edition), 2019 with common (English) names being used for ease of reading and accessibility. Bryophyte nomenclature follows Atherton *et al.* (Eds), 2010, with English names being used in line with this publication. Scientific names are used for fungal identification, with authorities referenced in the text, for reasons of clarity.

The survey method was extended to include a search for notable and/or legally-protected fauna ('important ecological features' with reference to CIEEM, 2018).

Target Note descriptions were recorded for features of ecological importance, these may include areas of species-rich vegetation and field signs of protected and/or notable species.

4.6.3 Preliminary Roost Assessment

A daytime preliminary roost assessment (PRA) was undertaken at the Site by an experienced and appropriately licensed ecologist (A. Franks: 2025-85517-CL17-BAT, Natural England licence number). An internal and external inspection of the built structures on the Site was carried out from ground-level using binoculars as required. The focus of the survey being to identify any possible exit and entry points of bats, suitable roosting locations and to search for bat field signs.

Within the built structures, particular attention was paid to areas suitable for roosting bats. Field signs that would indicate the presence of bats include:

- bat droppings;
- bat carcasses;
- feeding remains (particularly butterfly & moth wings);
- evidence of urine staining around possible roost entrances;
- presence of areas cleared of cobwebs;
- oily stains around possible roost entrances.

Built structures were assessed as having either 'high', 'moderate', 'low' or 'negligible' potential to support roosting bats, and categorised using definitions in Collins (2023) (see Table 7, below).

Table 7: Guidelines for Assessing the Potential Suitability for Roosting Bats of Structures within a Development Site¹⁰

Suitability	Description: Structure
None	No habitat features on site likely to be used by any roosting bats at any time of the year (<i>i.e.</i> a complete absence of crevices / suitable shelter at all ground / underground levels).

¹⁰ Taken and adapted from: Collins, 2023.

Suitability	Description: Structure
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions, and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (<i>i.e.</i> unlikely to be suitable for maternity and not a classic cool/stable hibernation site, but could be used by individual hibernating bats).
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions, and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions, and surrounding habitat. These structures have the potential to support high conservation status roosts, <i>e.g.</i> maternity or classic cool/stable hibernation site.
Confirmed Roost	Structure with confirmed bat roost.

In addition, a ground-level tree assessment (GLTA) was undertaken of mature and semi-mature trees within the Site boundary. Survey methods followed the guidelines and techniques recommended in Collins (2023), BTHK (2018), Cowan, (2003) and Reason and Wray (2025). Binoculars were used as required to obtain better views of potential roost features in trees. Features that can provide roosting sites for bats in trees include:

- woodpecker holes;
- cracks, splits and fissures in trunk and limbs;
- rot holes;
- trunk cavities;
- loose bark;
- dense ivy growth.

Trees were assessed and categorised using definitions in Collins (2023) (see Table 8, below).

Table 8: Guidelines for Assessing the Potential Suitability for Roosting Bats of Trees within a Development Site¹¹

Suitability	Description: Structure
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 (further classification to PRF-I or PRF-M not possible at this juncture).
PRF-I	PRF is only suitable for individual bats or very small numbers of bats either due to size or lack of suitable surrounding habitats.
PRF-M	PRF is suitable for multiple bats and may therefore be used by a maternity colony.
Confirmed Roost	Tree with confirmed bat roost.

¹¹ Taken and adapted from Collins, 2023.

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4.8 Legislation & Best Practice

4.8.1 The Environment Act 2021

The Environment Act 2021 is a far-reaching Act of parliament, which received Royal Assent on 9th November 2021 and took a number of years to come into force. It is described by the Chartered Institute of Ecology and Environmental Management as ‘world leading’ legislation and has the primary focus of providing targets, plans and policies for improving the natural environment. In implementing the Act, the Secretary of State is required to set long-term targets for a number of priority areas including: air quality, water, biodiversity, resource efficiency and waste reduction. Schedule 14 of the Act establishes a mandatory requirement for all developments to secure a 10% net gain in biodiversity, with a few exceptions such as ‘permitted development’ and marine and intertidal developments. Schedule 14 of the Act details the required amendment of the Town and Country Planning Act 1990 (inserting a new s.90A and Schedule 7A) with respect to ‘normal’ development. Schedule 15 describes amendments to the Planning Act 2008 with respect to Nationally Significant Infrastructure Projects, inserting a new s.99 and Schedule 2A.

The measurement of baseline and post-development biodiversity figures involves the use of the most up to date version of the state-sponsored ‘biodiversity metric’. A ‘small sites’ metric is available for sites of up to 0.5ha in size supporting 1 - 9 residential units or for other forms of development, with a floorspace of less than 5000m² and in both cases without priority habitats being present (with the exception of hedgerows and arable field margins). The 10% biodiversity net gain requirement described by the Act will not be mandatory until 12 February 2024 (major developments), although may be still be required by local plan policy in the intervening period. Other matters covered by the Environment Act are the creation of a Biodiversity Gain Site Register, the provision of Biodiversity Credits, the establishment of the Office for Environmental Protection (OEP) and the establishment of Local Nature Recovery Strategies. The Act further strengthens the biodiversity duty enshrined within s.40 of the Natural Environment and Rural Communities Act 2006, requiring not only the conservation of biodiversity but also its ‘enhancement’.

4.8.2 The Conservation of Habitats and Species Regulations 2017 (as amended) & The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019

<http://www.legislation.gov.uk/ukxi/2010/490/contents/made>

<https://www.legislation.gov.uk/ukxi/2019/579/contents/made>

These regulations referred hereafter as “the Habitats Regulations”, represent the primary method by which Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (the “Habitats Directive”) is transposed for England and Wales and their territorial seas. The Habitats Directive, in conjunction with the Birds Directive (Council Directive 2009/147/EEC) forms the basis for implementation of Europe’s nature conservation policy through both habitat and species level protection. The Habitats Directive requires the designation of strictly protected European sites known as Special Areas of Conservation (SACs). Together with the Special Protection Areas (SPAs)

established by the Birds Directive, these collectively form the Natura 2000 Network of protected sites ('National Site Network' in the UK). The Habitats Directive also requires the strict protection of animals and plants of Community Interest listed under Annex IV. Habitat types requiring strict protection as SACs are listed under Annex I. The conservation of animals and plants listed under Annex II requires the designation of SACs.

The Habitats Regulations require that public bodies must exercise their nature conservation responsibilities to ensure compliance with the Habitats Directive. These regulations also require the conservation of natural habitats and habitats of species through the selection, designation and notification of marine and terrestrial 'European Sites'. The habitats and species of European Importance are listed under Annexes I and II of the Habitats Directive. The regulations also contain provision for the appropriate management of these European Sites including the control of damaging operations, special nature conservation orders and restoration orders, for example. The Habitats Regulations afford strict protection to European Protected Species of animals under Schedule 2 and plants under Schedule 5. Offences (subject to certain exceptions) include the deliberate capture, killing, disturbance or trade in these animals. Similarly, plants listed under Schedule 5 are protected (subject to exceptions) from picking, collection, cutting, destruction or trade.

4.8.3 The Wildlife and Countryside Act 1981 (as amended)

While the Habitats Regulations provide the basis for nature conservation policy in Europe, the Wildlife and Countryside Act 1981 (as amended) (WCA) is still a major mechanism for the legislative protection of wildlife and countryside/national parks in the UK. The WCA, and its various amendments, draw on from pre-existing legislation and support the Habitats Regulations in implementing the Bern Convention (1979) and Directive 2009/147/EC on the conservation of wild birds. Schedules within the WCA provide a list of protected species and habitats, in addition to prohibited actions. Further details are provided below for specific species relevant to the report. The WCA also contains measures for controlling invasive non-native species and amendments to a number of laws, including in relation to public rights of way.

4.8.4 The Countryside and Rights of Way (CROW) Act 2000

The CROW Act amends existing WCA legislation in accordance with the 1992 Convention on Biological Diversity (Rio Earth Summit). The Act applies to England and Wales only and encompasses public access, rights of way, nature conservation and Areas of Outstanding Natural Beauty (AONBs). Schedule 9 of the Act provides increased powers for the protection and management of SSSIs while Schedule 12 strengthens the legal protection for protected species via arrestable offences and heavier penalties.

4.8.5 The Environment (Wales) Act 2016

The Environment (Wales) Act sets out the requirements to plan and manage natural resources of Wales in a more sustainable way.

Section 6, under Part 1 of the Act imposes a biodiversity duty on all public bodies to conserve biodiversity to encourage the resilience of ecosystems in Wales.

Section 7 (S7), under Part 1 of the Act requires the publication of a list of living organisms and types of habitat in Wales which in the Welsh Minister's opinion are of key significance for the purpose of sustaining and improving biodiversity. The list generated under S7 of the Act contains a number of types of habitats and species of animal and plant that have the potential to be affected by development projects of a range of sizes and impacts. This section replaces the duty formerly provided by Section 41 (s.41) of the Natural Environment and Rural Communities (NERC) Act 2006 (<https://www.biodiversitywales.org.uk/Environment-Wales-Act>).

4.8.6 The Hedgerow Regulations 1997

On 1 June 1997, the Hedgerow Regulations came into force under section 97 of the Environment Act 1995 to address the dramatic decline in UK hedgerows. The regulations protect important hedgerows by limiting removal through a system of notification via local planning authorities.

The regulations are aimed at countryside hedgerows in England and Wales “on or adjoining, common land, village greens, Site of Special Scientific Interest (which include National Nature Reserves, Special Protection Areas under the Birds Directive and Special Areas of Conservation under the Habitats Directive), Local Nature Reserves, or land used for agriculture, forestry or the breeding or keeping of horses, ponies or donkeys” (Section 3.6).

Written permission is required from the local planning authority before the removal of any hedgerow over 20 metres and more than 30 years old. Hedgerows less than 20 metres long may also be considered if they form part of a continuous network of hedges. Garden hedges, however, are not protected. Once the LPA has received a written request, they will issue either a Hedgerow Retention or Hedgerow Removal Notice within 42 days depending on whether they define the hedgerow as *important* or not. This is determined by the following;

- “They have been in existence 30 years or more; and”
- “They satisfy at least one of the criteria set out in Part II of Schedule 1 of the Regulations.”

Exemptions to the Regulations fall into three categories:

- “small scale works;”
- “works approved under other procedures which ensure careful assessment and consideration of the impact on the local environment; and”
- “works authorised under other legislation which justify the removal of a hedgerow without first establishing its importance.”

It is an offence to remove a hedgerow subject to a retention notice, or to remove a hedgerow protected under the Hedgerow Regulations without first obtaining the required removal notice.

4.8.7 National Planning Policy Wales

Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government. The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales, as required by the Planning (Wales) Act 2015, the Well-being of Future Generations (Wales) Act 2015 and other key legislation and resultant duties such as the Socio-economic Duty.

'The need for ecosystems, habitats and species to adapt to climate change and other pressures should be considered as part of the Green Infrastructure Assessment. This must include identifying ways to avoid or reverse the fragmentation of habitats, and to improve habitat connectivity where appropriate, through the promotion of wildlife corridors, protection of riverine corridors and identifying opportunities for land rehabilitation, reducing pollution, landscape management and habitat restoration, creation and nature recovery. The role of development as part of a spatial approach will be two fold. Planning authorities firstly must ensure that development avoids and then minimises impact on biodiversity and ecosystems and secondly that it provides opportunities for enhancement within areas identified as important for the ability of species to adapt and/or to move to more suitable habitats.' Paragraph 6.2.8

'Planning authorities must follow a 'Step-Wise Approach' to maintain and enhance biodiversity, build resilient ecological networks and deliver net benefits for biodiversity by ensuring that any adverse environmental effects are firstly avoided, then minimized, mitigated, and as a last resort compensated for. Enhancement must be secured by delivering a biodiversity benefit primarily on site or immediately adjacent to the site, over and above that required to mitigate or compensate for any negative impact.' Paragraph 6.4.11

The Step-Wise Approach is detailed in Figure 12 and Section 6.4.15 of PPW (pages 148 – 152).

4.8.9 BS42020:2013 Biodiversity. Code of Practice for Planning and Development

BS 42020 was developed by BSI with input from a variety of organisations (in all sectors) and experts in the field of biodiversity. It is fundamentally engaged with the incorporation of biodiversity into all stages of the planning process. The standard identifies a suite of recommendations and advice to ensure that decision-making and activities undertaken from inception to fruition of planning applications are adequately informed by appropriate and robust ecological knowledge. BS42020 aims to:

- give decision-makers (and specifically planning authorities and other regulatory bodies) more confidence that the ecological audits and assessment of impact on biodiversity provided in support of development proposals is fit for purpose;

- encourage greater consistency and transparency in the quality, scientific robustness and transparency of ecological reports that are submitted with planning applications and other forms of regulatory approval; and
- foster an approach that is proportionate and retains and positive environmental legacy following development.

4.8.10 Bats

All British bats are “European Protected Species” (EPS) and listed on Annex II and Annex IV of the EC Habitats Directive. The Directive is transposed into UK law through the Conservation of Habitats and Species Regulations 2017 (as amended). The following actions affecting bats are prohibited under the legislation:

- deliberate capture, injury or killing of a bat;
- deliberate disturbance of a bat and in particular disturbance which is likely to impair their ability:
 - o to survive, to breed or reproduce, or to rear or nurture their young, or
 - o in the case of animals of a hibernating or migratory species, to hibernate or migrate;
 - o or to affect significantly the local distribution or abundance of the species to which they belong.
- damage or destruction of a breeding site or resting place;
- possessing, controlling transporting, selling or exchanging, or offering for sale or exchange, any bat or any part of a bat or anything derived from one.

Bats are also afforded protection from intentional or reckless ‘disturbance’ by the Wildlife and Countryside Act 1981 (as amended). The deliberate or reckless obstruction of access to a structure or place used by bats for shelter and protection is also an offence under the Act.

Barbastelle, Bechstein's bat, noctule, common pipistrelle, soprano pipistrelle, brown long-eared bat, greater horseshoe bat and lesser horseshoe bat are also listed as a species ‘*of principal importance for the purpose of maintaining and enhancing biodiversity*’ under Section 7 of the Environment (Wales) Act 2016.

4.8.11 Badgers

Badgers and their setts are protected by the Protection of Badgers Act 1992 (as amended). This makes it an offence to wilfully kill, injure or take a badger or interfere with a badger sett through damaging the sett, destroying the sett, obstructing access to a sett, causing a dog to enter the sett or disturbing a badger occupying a sett.

4.8.12 Birds

All wild birds in the UK are afforded protection under the Wildlife and Countryside Act 1981 (as amended). This protection includes killing, injuring or taking wild birds as well as taking, damaging or destroying bird nests in use or being built, and taking or destroying eggs.

Birds listed under Schedule 1 of the Act are afforded additional protection from disturbance during nesting and offences relating to these birds are subject to special penalties. The nest sites of birds listed under Schedule ZA1 of the act (golden eagle, white-tailed eagle and osprey) are afforded strict, year-round protection even when the nests are not in active use.

4.8.13 Great Crested Newts

The great crested newt (*Triturus cristatus*) (Laurenti, 1758), is a “European Protected Species” (EPS) and listed on Annex II and Annex IV of the EC Habitats Directive. The Directive is transposed into UK law through the Conservation of Habitats and Species Regulations 2017 (as amended). The following actions affecting great crested newts are prohibited under the legislation:

- deliberate capture, injury or killing of a great crested newt;
- deliberate disturbance of a great crested newt and in particular disturbance which is likely to impair their ability:
 - o to survive, to breed or reproduce, or to rear or nurture their young, or
 - o in the case of animals of a hibernating or migratory species, to hibernate or migrate;
 - o or to affect significantly the local distribution or abundance of the species to which they belong.
- damage or destruction of a breeding site or resting place;
- possessing, controlling transporting, selling or exchanging, or offering for sale or exchange, any great crested newt, any part of a great crested newt or anything derived from one.

Great crested newts are also afforded protection from intentional or reckless ‘disturbance’ by the Wildlife and Countryside Act 1981 (as amended). The deliberate or reckless obstruction of access to a structure or place used by great crested newts for shelter and protection is also an offence under the Act. This applies to both aquatic and terrestrial habitat.

Great crested newts are also listed as a species ‘*of principal importance for the purpose of maintaining and enhancing biodiversity*’ under Section 7 of the Environment (Wales) Act 2016.

4.8.14 Reptiles

All common reptile species (grass snake, adder, common lizard and slow-worm) native to Britain are protected by Schedule 5 the Wildlife & Countryside Act, 1981 (as amended). It is illegal to:

- deliberately kill, injure a reptile or
- sale, barter, exchange, transport for sale and advertising to sell or to buy a reptile.
- In Northern Ireland they are fully protected against killing, injuring, capturing, disturbance, possession or trade.

In addition, sand lizard and smooth snake are protected under Conservation of Habitats and Species Regulations 2017. The following actions affecting these reptiles are prohibited under the legislation:

- deliberate capture, injury or killing;
- deliberate disturbance and in particular disturbance which is likely to impair their ability:
 - o to survive, to breed or reproduce, or to rear or nurture their young, or
 - o in the case of animals of a hibernating or migratory species, to hibernate or migrate;
 - o or to affect significantly the local distribution or abundance of the species to which they belong.
- damage or destruction of a breeding site or resting place;
- possessing, controlling transporting, selling or exchanging, or offering for sale or exchange, these reptiles or anything derived from them.

All five native reptiles found in Wales (slow-worm, grass snake, adder, sand lizard, common lizard) are listed under Section 7 of the Environment (Wales) Act 2016.

Sand lizards and smooth snakes are also afforded protection from intentional or reckless 'disturbance' by the Wildlife and Countryside Act 1981 (as amended). The deliberate or reckless obstruction of access to a structure or place used by these reptiles for shelter and protection is also an offence under the Act.

4.8.15 Hazel Dormice

The hazel dormouse (*Muscardinus avellanarius*) is a "European Protected Species" (EPS) and listed on Annex II and Annex IV of the EC Habitats Directive. The Directive is transposed into UK law through the Conservation of Habitats and Species Regulations 2017 (as amended). The following actions affecting hazel dormice are prohibited under the legislation:

- deliberate capture, injury or killing of a hazel dormouse;
- deliberate disturbance of a hazel dormouse and in particular disturbance which is likely to impair their ability:
 - o to survive, to breed or reproduce, or to rear or nurture their young, or
 - o in the case of animals of a hibernating or migratory species, to hibernate or migrate;
 - o or to affect significantly the local distribution or abundance of the species to which they belong.
- damage or destruction of a breeding site or resting place;
- possessing, controlling transporting, selling or exchanging, or offering for sale or exchange, any otter, any part of a hazel dormouse or anything derived from one.

Hazel dormice are also afforded protection from intentional or reckless 'disturbance' by the Wildlife and Countryside Act 1981 (as amended). The deliberate or reckless obstruction of access to a structure or place used by hazel dormice for shelter and protection is also an offence under the Act.

Hazel dormice are also listed as a species '*of principal importance for the purpose of maintaining and enhancing biodiversity*' under Section 7 of the Environment (Wales) Act 2016.

4.8.16 Otters

The otter (*Lutra lutra*) is a "European Protected Species" (EPS) and listed on Annex II and Annex IV of the EC Habitats Directive. The Directive is transposed into UK law through the Conservation of Habitats and Species Regulations 2017 (as amended). The following actions affecting otters are prohibited under the legislation:

- deliberate capture, injury or killing of a otter;
- deliberate disturbance of an otter and in particular disturbance which is likely to impair their ability:
 - o to survive, to breed or reproduce, or to rear or nurture their young, or
 - o in the case of animals of a hibernating or migratory species, to hibernate or migrate;
 - o or to affect significantly the local distribution or abundance of the species to which they belong.
- damage or destruction of a breeding site or resting place;
- possessing, controlling transporting, selling or exchanging, or offering for sale or exchange, any otter, any part of an otter or anything derived from one.

Otters are also afforded protection from intentional or reckless 'disturbance' by the Wildlife and Countryside Act 1981 (as amended). The deliberate or reckless obstruction of access to a structure or place used by otters for shelter and protection is also an offence under the Act.

Otters are also listed as a species '*of principal importance for the purpose of maintaining and enhancing biodiversity*' under Section 7 of the Environment (Wales) Act 2016.

4.8.17 Water voles

Water voles (*Arvicola amphibius*) are fully protected under the Wildlife and Countryside Act 1981. It is an offence to intentionally:

- kill, injure or take them.
- possess or control them (alive or dead).

It is also an offence to intentionally or recklessly:

- damage or destroy a structure or place used for shelter or protection.
- disturb them in a place used for shelter or protection.
- obstruct access to a place used for shelter or protection.

Water voles are also listed as a species '*of principal importance for the purpose of maintaining and enhancing biodiversity*' under Section 7 of the Environment (Wales) Act 2016.

5. QUALIFICATIONS & EXPERIENCE

Focus Environmental Consultants® has the expertise to provide sure-fire environmental solutions to a wide range of projects. The company ethos forges the highest standards of professional scientific practice with a best value approach for our clients. Our core area of expertise is in the production of specialist environmental reports and advice to support planning applications. Our comprehensive services include Preliminary Ecological Appraisals (PEA), Biodiversity Net Gain (BNG) assessments and calculations, Ecological Impact Assessment (EclA), Habitat Regulations Assessment (HRA) and fulfilling protected species surveys, licensing and mitigation requirements. Focus Environmental Consultants is a CIEEM Registered Practice, with all ecological staff being members of this professional body. Our flexible approach, range of skills and broad project experience from major infrastructure contracts to small private developments allows us to adapt to your individual requirements. As well as offering a full suite of ecological services, Focus Environmental Consultants can provide expert arboricultural advice and reports and is building an enviable reputation for innovative habitat creation and management solutions. Focus Environmental Consultants is situated in Worcestershire, providing a convenient and central UK location.

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