

Green  
Environmental  
Consultants

**THE FORMER BEALES HOTEL  
COMET WAY  
HATFIELD  
AL10 9NG**

**ECOLOGICAL IMPACT ASSESSMENT**

May 2022

for:

Hatfield Park Homes Ltd

Report number: 1538/1

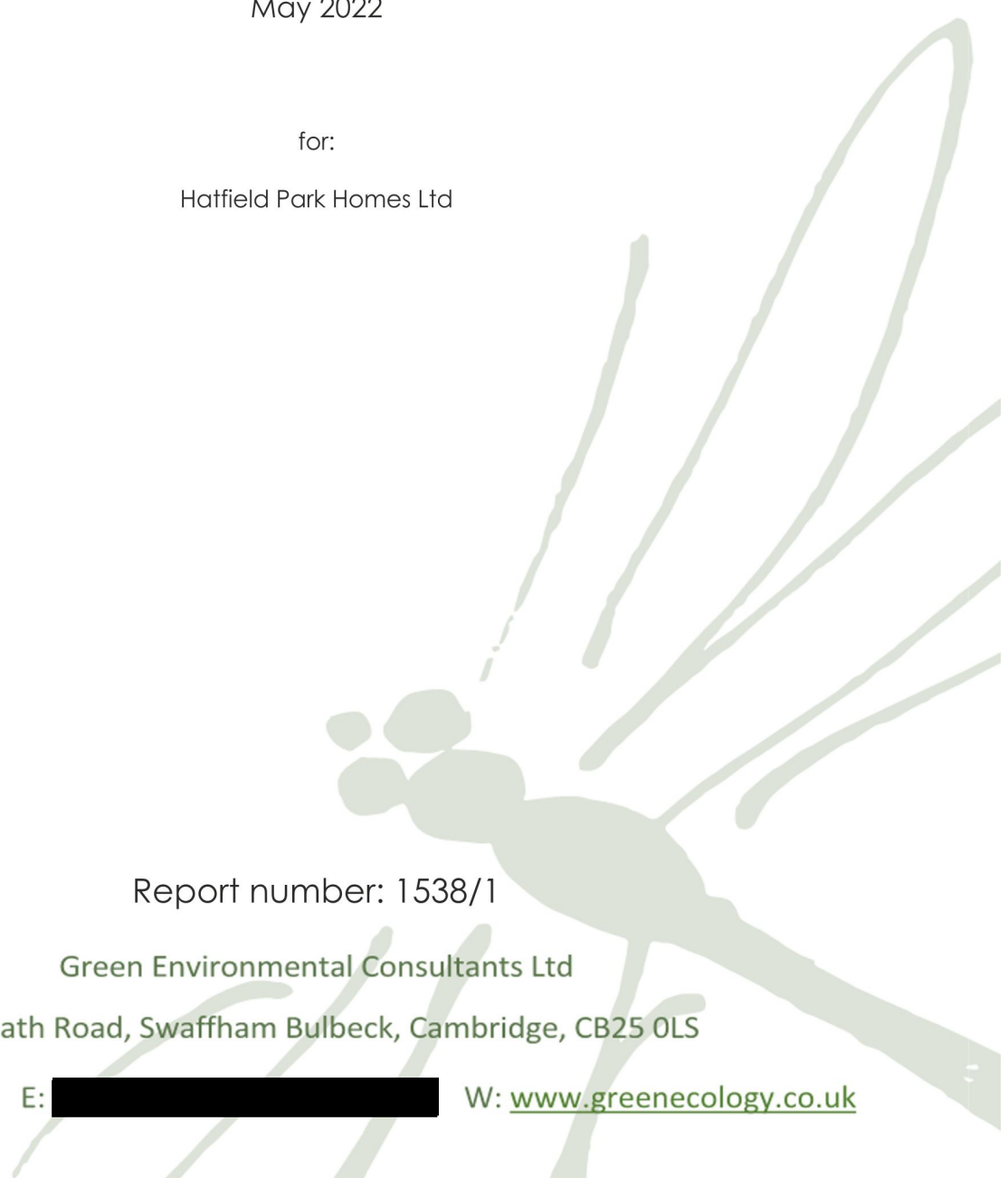
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**FORMER BEALES HOTEL, COMET WAY, HATFIELD, AL10 9NG**

**ECOLOGICAL IMPACT ASSESSMENT**

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## LIMITATIONS AND EXCEPTIONS

### Limitations of Surveys

This report records wildlife found during the survey and anecdotal evidence of some species. Access, seasonality and weather conditions may affect survey results. It does not record any animals or plants that may appear at other times of the year and were therefore not evident at the time(s) of the visit(s). Habitats outside the site boundary were only visited where considered appropriate and where access was available.

The behaviour of animals can be unpredictable and may not conform to standard patterns recorded in current scientific literature. Many species are highly mobile and can occupy a site which has previously held no potential for them and factors such as increasing habitat pressure can cause animals to occupy areas that were previously unoccupied, or which might be considered far from suitable. This report therefore cannot predict with absolute certainty that animal species will occur in apparently suitable locations or that they will not occur in locations or habitats which appear to be unsuitable.

### Limitations of Report

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

The Executive Summary, Conclusions and Recommendations sections of the report provide an overview and guidance only and should not be specifically relied upon until considered in the context of the whole report. Interpretations and recommendations contained in the report represent our professional opinions, which were arrived at in accordance with currently accepted industry practices at the time of reporting and based on current legislation in force at that time.

Where the data available from previous reports, or for other subject matter supplied by the Client, have been used, it has been assumed that the information is correct. No responsibility can be accepted by us for inaccuracies within the data supplied.

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This report is prepared and written in the context of the proposals stated in the introduction to this report and should not be used in a differing context. Furthermore, new information, improved practices and legislation may necessitate an alteration to the report in whole or in part after its submission. Therefore, with any change in circumstances or after the expiry of two years from the date of the report, the report should be referred to us for re-assessment and, if necessary, reappraisal.


Scientific survey data will be shared with local biological records centre in accordance with the CIEEM professional code of conduct.

Please note that Green Environmental Consultants Ltd is an ecological consultancy. Any information relating to legal matters in this report is provided in good faith but does not purport in any way to give any advice on or interpretation of the law whatsoever. Professional legal advice should always be sought.

The data, advice and opinion which we have prepared and provided is true, and have been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct. I confirm that the opinions expressed are my true and professional *bona fide* opinions.

This ecological information is supplied in accordance with BS 42020 2013.



 BSc(Hons), MSc, CEcol, FCIEEM

## **1 EXECUTIVE SUMMARY**

This report has been prepared by Green Environmental Consultants Ltd and relates to the Former Beales Hotel, Comet Way, Hatfield, AL10 9NG (the 'Site'). The report comprises the results of a Preliminary Ecological Appraisal (PEA) and a Preliminary Bat Roost Assessment (PBRA) to establish existing ecological value and ascertain potential impacts of the proposed scheme. As no further surveys are required, this report is presented as an Ecological Impact Assessment.

A separate Biodiversity Net Gain report and calculator (report numbers 1538/2/1 & 2) are provided to accompany this EclA.

The Site comprised the former Beales Hotel, plus three smaller storage and service structures, ornamental planting, boundary vegetation and extensive areas of paved surfacing. The proposals include demolition of existing building and construction of 145 residential units with private and communal amenity space, landscaping, and associated infrastructure.

### **Results**

PEA: No evidence of protected and notable species was found, and the habitats were of negligible suitability to support these species.

PBRA: Structures and trees were of negligible suitability for bat roosts, and no evidence of bat roost utilisation was found. Boundary vegetation and trees constituted moderate suitability for foraging and commuting bats, although utilisation is anticipated to be at low levels.

### **Evaluation & Further Surveys**

The Site has no suitability for protected species, and there are no ecological constraints to redevelopment. The proposals will not impact other sites or habitats, and further ecological surveys are not required.

### **Mitigation & Enhancement**

Aside from the potential for vegetation to support breeding common bird species, impacts on local wildlife are not anticipated. Mitigation is restricted to avoiding disturbance to nesting birds. The scale of the proposed redevelopment offers opportunities for habitat enhancement aimed at widespread urban species.

### **Conclusions**

This impact assessment concludes that the Site holds negligible value for protected and notable wildlife and consequently, further ecological surveys are not required. Potential impacts arising from redevelopment will be localised and readily mitigated. Proportionate and targeted enhancements will raise biodiversity opportunities beyond those currently available.

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## **2 INTRODUCTION AND OBJECTIVES**

### **2.1 Introduction**

This report has been prepared by Green Environmental Consultants Ltd on behalf of Hatfield Park Homes Ltd. It relates to the Former Beales Hotel, Comet Way, Hatfield, AL10 9NG (the 'Site') which is centred on Ordnance Survey national grid reference TL 2145 0856.

This report comprises the results of a Preliminary Ecological Appraisal (PEA) and a Preliminary Bat Roost Assessment (PBRA), to establish existing ecological value and ascertain potential impacts. It also assesses the constraints to development that may arise from ecological issues. As no further surveys are required, this report is presented as an Ecological Impact Assessment.

Separate Biodiversity Net Gain report and calculator have been produced to accompany this assessment (report numbers 1538/2/1 and 2).

The 0.64-hectare site comprised the former Beales Hotel, a two-storey structure, plus several smaller service structures, areas of ornamental planting, boundary vegetation and extensive areas of paved surfacing.

The proposals comprise the demolition of existing buildings and construction of 145 residential units (Use Class C3) with private and communal amenity space, landscaping, access, associated car and cycle parking, refuse and recycling storage and supporting infrastructure.

The surveys were conducted by Andrew Palmer BSc (Hons), DipLA, MCIEEM, an experienced and licensed ecological surveyor. The reporting process and evaluation have been overseen by Jacqui Green BSc (Hons), MSc, CEcol, FCIEEM.

### **2.2 Objectives**

The objectives of the survey are:

- To undertake a Preliminary Ecological Appraisal (PEA).
- To undertake a Preliminary Bat Roost Assessment (PBRA).
- To recommend follow-on species surveys if identified as being needed.
- To make recommendations to mitigate potential negative impacts arising from development proposals; and
- To make recommendations to enhance on-site habitats and wildlife opportunities resulting in an overall biodiversity net gain.

## **3 EVALUATION CRITERIA**

### **3.1 Baseline Ecological Conditions**

The ecological baseline was established through a desk study and site survey as outlined in chapter 4. The results were evaluated against a hierarchy of protection ranging from the highest level (internationally protected) to no statutory protection but which receive consideration under planning legislation. These factors have been assessed against ecological evaluation criteria developed by the Chartered Institute of Ecology and Environmental Management.

## 3.2 Legislation

### 3.2.1 European Protected Species (EPS) (Great Crested Newts, bats, Otters, Dormice and others)

The information below is intended only as guidance to the legislation relating to these species, the Acts themselves should be referred to for the correct legal wording.

European Protected Species are protected under the EC Council Directive on the Conservation of Natural Habitats and Wild Fauna and Flora (the Habitats and Species Directive). This legislation is enacted under the Conservation of Habitats & Species Regulations 2017 (the 2017 Regulations). Works which involve impacts on EPS are likely to require a Natural England licence.

- In England, Scotland and Wales all bat species are also protected under the Wildlife and Countryside Act (WCA) 1981 (as amended) through inclusion in Schedule 5. The offences under this Act, which cover the obstruction of places used for shelter or protection, disturbance and sale still apply to European Protected Species (EPS).
- In England and Wales, the WCA is amended by the Countryside Rights of Way Act 2000 (CRoW), which adds an extra offence ('or recklessly') to S9(4)(a) and (b)), makes species offences arrestable, increases the time limits for some prosecutions and increases penalties.

Broadly it is an offence to:

- ▶ Intentionally or recklessly/deliberately injure, take or kill a bat or other EPS.
- ▶ To possess an EPS (unless obtained legally) alive or dead.
- ▶ Intentionally or recklessly/deliberately damage, destroy or obstruct access to any place that bats (or other EPS) use for shelter or protection, whether bats are present or not.
- ▶ Intentionally or recklessly/deliberately disturb an EPS while it is occupying a structure or place that it uses for shelter or protection.
- ▶ Deliberately disturb an EPS in such a way as to be likely to affect significantly:
  - (i) the ability of any significant group to survive, breed, or rear or nurture their young
  - (ii) the local distribution or abundance of that species.

A European Protected Species Licence is required before the commencement of any development that might impact on bats and their roosts, or other EPS.

Exemptions (derogations) can be granted from the protection afforded to bats under the Habitat Regulations, by means of an EPS (European Protected Species) Habitats Regulations licence obtained from Natural England (NE). An EPS Mitigation Licence (EPSML) could be required for (relevant examples):

- Demolition of a building known to be used by bats prior to the development of a site.
- When removing trees in which bats roost, as well as tree pruning.
- When undertaking significant alterations to roof voids used by bats.

There are three tests which must be satisfied before a licence can be issued to permit otherwise prohibited acts, in this case only Regulation 53(2)(e) is relevant, namely, for the purpose of preserving public health or safety, or other imperative reasons of overriding public interest. This includes those of a social or economic nature and with beneficial consequences of primary importance to the environment.

This is subject to Natural England's satisfaction that the application additionally meets:

- Regulation 53(9)(a) that there is no satisfactory alternative.
- Regulation 53(3)(b) that the action authorised will not be detrimental to the maintenance of the species concerned at favourable conservation status in their natural range.

As a result of a High Court ruling local authorities must consider all applications where European Protected Species are likely to be affected and a European Protected Species licence required, by considering the 3 tests applicable to the Habitats Directive.

### 3.2.2 Wildlife & Countryside Act Protected Species (water voles, barn owls, reptiles etc)

A number of species receive protection at a national level, usually against injury and killing, but may also include destruction of a resting place, collection and sale (the latter may also apply to selected named plants). Water voles and the more common species of reptiles are included in this group.

The more common species of reptile - Grass Snake *Natrix natrix*, Slow-worm *Anguis fragilis*, Common Lizard *Lacerta vivipara* and Adder *Vipera berus* - have partial protection under the Wildlife and Countryside Act 1981. That is, they are protected against intentional killing and injuring (but not 'taking'), and against sale etc. They are also Species of Principal Importance (SPI).

### 3.2.3 Other Species Legislation

Certain species are protected under other legislation eg the Protection of Badgers Act 1992 which gives special protection against harm to badgers or their setts.

### 3.2.4 Biodiversity Species and Habitats

A number of species and habitats which do not merit national protection are nevertheless threatened or endangered at a more localised scale, usually at a county level, or have been discovered to have undergone a rapid decline. These are listed on the UK Species/Habitats of Principal Importance (S41) list (see under 'The England Biodiversity List' in section 2.3), or county (Local) Biodiversity Action Plans (BAPs) and would be considered to be part of the National Planning Policy Framework lower tier.

Further lists are provided for eg Birds of Conservation Concern BoCC (Red Lists) and species of conservation concern eg Red Data lists. There may also be local or county lists.

### 3.2.5 Birds - General

All nesting birds are protected under Section 1(1)(b) of the Wildlife and Countryside Act (1981) (*ibid*). It is an offence to:

... *intentionally take, damage or destroy the nest of any wild bird while that nest is in use or being built; or take or destroy an egg of any wild bird.*

As a consequence no scrub or tree clearance or management should be undertaken during the nesting season, unless works to make the habitats unsuitable are first undertaken, or a detailed examination before clearance starts declares the area free. The nesting season is generally taken to be between mid-March and August if second broods are present, but warm seasons may extend this period to between February and September.



### 3.3 Obligations Under Planning Legislation

The National Planning Policy Framework (NPPF) (OGL 2021) sets out the Government's planning policies for England and how these are expected to be applied. The NPPF Paragraph 180 says:

*'When determining planning applications, local planning authorities should apply the following principles:*

- *if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- *development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and*
- *development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.'*

The Natural Environment and Rural Communities Act (OPSI 2006) (section 40(1)) states that:

*'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.'*

### 3.4 Ecological Evaluation

It is important to put records and results into context using criteria such as designation, rarity, vulnerability, threat, location in a linkage of sites or features, importance at a given scale (eg national, local, parish) etc. The Chartered Institute of Ecology and Environmental Management has developed evaluation guidelines. These guidelines acknowledge that ecological evaluation is a complex and subjective process but provides key considerations to take into account when applying professional judgement to assign values to ecological features and resources. These include consideration of geographic frame of reference; legal protection, site designations and features; biodiversity value; large populations or important assemblages of species; potential value, secondary or supporting value; social/community value and economic value. These evaluation criteria, based on those developed by the Chartered Institute of Ecology and Environmental Management, are given below:

**Table 3.1 Ecological Valuation Levels**

Level of Importance	Value	Comment
International	Very High	Sites, habitats or species protected under international legislation eg. The Habitats and Species Directive. These include, amongst others: Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar Sites, Biosphere Reserves, plus undesignated sites supporting populations of internationally important species.

Level of Importance	Value	Comment
National	Very High/ High	Sites, habitats or species protected under national legislation e.g. Wildlife & Countryside Act 1981 and amendments. Sites include Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNRs), Marine Reserves, plus areas supporting significant areas of UK Habitats of Principal Importance, or breeding populations of rare (Red Data Book) species.
Regional	Medium	Sites, habitats or species which may have regional importance, but which are not protected under legislation (although Local Plans may specifically identify them) e.g. viable areas or populations of Regional Biodiversity Action Plan habitats or species; regionally important invertebrate assemblages etc.
County	Medium	Sites, habitats or species meeting the criteria for Local (County, Metropolitan or Unitary Authority area) designation e.g. Local Wildlife Site. This category includes designated Local Nature Reserves, which have statutory protection. Sites containing viable areas or populations of Species of Principal Importance (SPIs) or County Biodiversity Action Plan habitats or species, local Red Data Book species etc.
Local or Parish	Low	Undesignated sites or features, which enhance or enrich the wildlife resource at a Parish or neighbourhood level.
Zone of influence	Very Low	Includes nil or low ecological value but which form a function within the site or immediate surroundings.

## 4 METHODS

### 4.1 Desk Study

A desk study was undertaken to gather existing ecological records in relation to the site and the surrounding area, to provide ecological context for the site, and to inform an assessment of the potential ecological constraints to development.

A 2 km radius ecological records search was undertaken from the Herts Environmental Records Centre (HERC) in December 2021. MAGIC (Multi-Agency Geographic Information for the Countryside) was also searched in August 2021. Current Ordnance Survey maps and aerial photographs were used to identify the presence of features up to 500 m from the site, which might be used by protected or notable species.

### 4.2 Habitat Survey

#### 4.2.1 Methodology

A basic vegetation assessment was conducted on 12 January 2022, broadly following the 'Preliminary Ecological Appraisal' methodology set out in the 'Guidelines for Preliminary Ecological Appraisal' (Chartered Institute of Ecology and Environmental Management [CIEEM], 2012). A detailed characterisation of the habitats present in accordance with the UK Habitat Classification (UKHab - <https://ukhab.org/>) has been made for the accompanying Biodiversity

Net Gain (BNG) Calculations. For the purposes of the PEA, summary descriptions of plant assemblages and habitats are provided that form the basis of the UKHab classification.

#### 4.2.2 Survey Limitations

The survey did not encounter significant constraints or limitations. Habitat surveys can be conducted at any time of year when conditions permit, although better done outside the winter season. Although undertaken in January, this Site was predominately developed land within an urban context where seasonality is not considered to be a limiting factor.

### 4.3 Scoping for Protected & Biodiversity Species

The Site was inspected for evidence of protected or notable species and its potential to support them. This included those animals and plants listed under The Conservation of Habitats and Species Regulations 2017, the Wildlife & Countryside Act 1981 (as amended), the Natural Environment and Rural Communities (NERC) Act 2006, the Countryside & Rights of Way (CRoW) Act 2000, and those on the S41 list. The Site was also searched for evidence of Invasive Non-native Species (INNS) as listed on Schedule 9 of the Wildlife and Countryside Act.

### 4.4 Preliminary Bat Roost Assessment

#### 4.4.1 General

The survey took place on 22 January 2022 in suitable weather conditions.

The Site was evaluated for its bat roost potential according to standard survey guidelines outlined in the BCT Good Practice Guidelines (Collins 2016), as shown in Table 4.1. The purpose of thorough examinations is to provide a basis for recommendations for further bat surveys if required; evaluate the likely ecological impacts of potential works on roosts and habitat utilisation; and recommend mitigation or compensation measures that may be required, as well as habitat enhancements. During the survey, evidence of nesting and roosting birds was also recorded.

**Table 4.1: Assessment of Bat Roosting Potential in Buildings or Trees (adapted Collins, 2016).**

Suitability	Assessment of Features Present That Potentially Support Roosting Bats
Negligible	Negligible habitat features on site and unlikely to be used by roosting bats.
Low	A small number of potential roosting sites present, with features most likely to be used by a <i>low number</i> of bats on a <i>transient basis</i> (i.e. not regularly, nor for breeding or hibernation roosts).
Moderate	Several potential roosting sites present, with features that are <i>unlikely</i> to support maternity or hibernation roosts.
High	Potential roosting sites, with features conducive to the establishment of roosts of high conservation value, e.g. larger number of bats, regular roosting, occupancy for longer periods, maternity and or hibernation roosts.

#### 4.4.2 Building Survey

An inspection of the buildings was conducted both internally and externally. Features were examined through binoculars and with a high-powered spotlight. Where further examination was necessary, this was undertaken using ladders, an endoscope, and a combination of a mirror and a torch. External crevices were followed to identify if internal connectivity was present.

Internal spaces were checked for:

- bats and evidence of bats, e.g., alive and dead bats, audible squeaking, droppings on the floor, walls, furniture and in cobwebs, urine marks on hard surfaces, feeding signs, etc.); and
- suitability for roosting, including potential roost locations, access points, light levels, draughts, etc.

External inspections also searched for:

- bats and evidence of bats, e.g., live bats in crevices, droppings and urine marks on walls and windows, etc.; and
- suitability for roosting, including potential access into the fabric of the building, particularly at eaves, soffits, under flashing and roof and ridge tiles, etc.

The survey undertaken was thorough, systematic and consistent with an approach recommended to Natural England Roost Visitors.

#### 4.4.3 Tree Survey

All trees within the Site and overhanging the boundary were inspected from ground level using binoculars and a powerful spotlight. Concerning the potential for roosting bats, attention was paid to the nature of holes and other cavity and crevice features and broadly referred to as features described in the 'Bat Tree Habitat Key (3rd Ed.)' (Andrews 2018).

The following potential roost features (PRFs) may indicate the presence of a bat roost in a tree:

- Woodpecker and rot holes; knot holes arising from naturally shed branches, or branches previously pruned back to the branch collar or cavities created by branches tearing out from parent stems; splits and cracks such as hazard beams and frost-cracks in stems or branches; partially detached platey bark; partially detached Ivy with stem diameters above 50mm; and bat, bird, or Dormouse boxes.

Detecting bats within trees during daylight surveys can be challenging, but occasionally the presence of bats can be indicated by signs such as:

- Vocalisations and droppings and luxuriant plant growth around the base of a tree that may have been fertilised by bat guano.

#### 4.4.4 Habitat Evaluation concerning Foraging and Commuting Bats

A broad assessment of surrounding habitats for foraging and commuting suitability was undertaken with reference to the BCT Guidelines as summarised in Table 4.2.

**Table 4.2: Assessment of Bat Activity Suitability (Commuting and Foraging) in Surrounding Habitat** - adapted from Collins (2016).

<b>Suitability</b>	<b>Commuting and Foraging Habitats</b>
Negligible	Negligible habitat features on-site likely to be used by commuting or foraging bats.
Low	Habitat that could be used by small numbers of bats such as a 'gappy' hedgerow, small patch of scrub, or isolated tree.
Moderate	Continuous habitat connected to the broader countryside such as tree-lines or linked back gardens, scrub, and grassland.
High	Continuous, high-quality habitat well connected to the broader landscape such as woodland, tree-lined watercourses, grazed parkland, river valleys, woodland edge.

#### 4.4.5 Surveyor Details

The survey was conducted by Andrew Palmer MCIEEM, an experienced bat worker holding a Level-2 Bat Survey Licence since 2011 (Class Licence Registration Number: 2015-12285-CLS-CLS).

#### 4.4.6 Survey Limitations

The survey adhered to good practice and did not encounter significant constraints or limitations.

### 4.5 Other Species

The PBRA included a search of the site for evidence of protected and notable mammal species other than bats. Particular attention was paid to nesting birds.

## 5 RESULTS

### 5.1 Desk Study

#### 5.1.1 Sites

*Statutory Sites* - The Site lies within 2 km of two Local Nature Reserves (LNR):

- ▶ Howe Dell LNR - 4 hectares site 1.5 km distance. Ancient woodland; woodland indicators present.
- ▶ Oxleys Wood LNR – 1.2 ha site 1.7 km distance. Old/ancient woodland with a semi-natural canopy and varied structure; woodland indicators.

The proposed development would not impact these sites, and no further evaluation is required.

*Non-statutory Sites*

*Ancient woodland* - The Site lies within 2 km of one Ancient Woodland Inventory Sites:

- ▶ Hazel Grove LNR – 3.2 ha site 1.2 km distance.

The proposed development would not impact this site, and no further evaluation is required.

*Herts and Middlesex Wildlife Trust Nature Reserves* - The Site does not lie within 2 km of any HMWT reserves.

*Local Wildlife Sites* - The Site lies within 2 km of eight non-statutory LoWS:

- Hazel Grove LWS - 6 ha site, 1.2 km distance. Ancient Woodland Inventory site; woodland indicators.
- Howe Dell School LWS - 1.2 km distance. Buildings and environs are important for protected species.
- Home Covert & Round Wood LWS - 13.5 ha site, 1.3 km distance. Ancient Woodland Inventory site; woodland indicators.
- Copse at Nast Hyde LWS - 2.5 ha site, 1.4 km distance. Part ancient woodland.
- Howe Dell/Stream Woods LWS – 3.8 ha site, 1.5 km distance. Ancient woodland; woodland indicators present.
- Oxleys Wood LWS - 1.4 ha site. 1.7 km distance. Old/ancient woodland with a semi-natural canopy and varied structure; woodland indicators.

- Grassland Strip nr. Butterfield Cottage LWS - 2.9 ha site, 1.8 km distance. Grassland indicators.
- Sleapshyde Farm LWS - 1.9 km distance. Buildings and environs are important for protected species.
- Furzefield Wood (near Hatfield)LWS - 18 ha, 2 km distance. Old secondary woodland with woodland indicators.

Potential impacts on LWS will be negligible, and no further assessment work is required.

## 5.1.2 Protected Species

### 5.1.2.1 *European Protected Species*

Records of protected species can be confidential for several reasons. As a safeguard, the complete species list is not included in full in this report. However, information that might be relevant to this Site is itemised below.

**Amphibians:** There were 55 records of Great Crested Newt *Triturus cristatus*, of which the closest was 850 m distance. There has been one Great Crested Newt Class Survey Licence Return within 1 km and a further eleven within 2 km. Three ornamental water bodies were identified within 250 m of the Site. Further details are provided below.

**Bats:** Over 450 records of ten species of regularly occurring Hertfordshire bat species were returned, including Common Pipistrelle *Pipistrellus pipistrellus* (45 records), Soprano Pipistrelle *Pipistrellus pygmaeus* (13), Nathusius' Pipistrelle *Pipistrellus nathusii* (4), Noctule *Nyctalus noctula* (21), Leisler's bat *Nyctalus leisleri* (2), Serotine *Eptesicus serotinus* (3), Natterer's bat *Myotis nattereri* (101) and Daubenton's *Myotis daubentonii* (108), Brown Long-eared *Plecotus auritus* (59) and Barbastelle bat *Barbastella barbastellus* (2). The remaining records were not specific. However, most of these records occurred from more rural parts of the search area and not from urban Hatfield. The assemblages present around the site of the former Beales Hotel will be significantly more restricted and less important for bat populations. There were two European Protected Species applications for bats that were granted within 2 km involving roosts of Common Pipistrelle and Brown Long-eared bat.

Other mammals – None of significance.

### 5.1.2.2 *UK Protected Species*

**Mammals - Badger *Meles meles*:** 40 records were returned, although all are likely to fall outside 1 km of the Site.

**Reptiles -** Records included two Common Lizard *Zootoca vivipara*, twelve Grass Snake *Natrix Helvetica* and two Slow-worm *Anguis fragilis*. All but two Grass Snake records were more than 30 years old, and none of the records is relevant to the site.

**Birds -** Over 1,000 records were returned, although none were relevant to the site (i.e., species requiring different habitats or winter visitors only).

**Invertebrates -** Three records, but none were relevant.

## 5.1.3 Species/Habitats of Principal Importance and other Biodiversity Issues

Thousands of floral and faunal species records were provided. None of these was specifically relevant to the site or development proposals.

#### 5.1.4 Invasive Non-native Species (INNS) listed on Schedule 9 of the WCA

Several records for INNS species of plant and animal records were provided. None of these was relevant to the site.

The absence of records does not mean that a particular species is not present but may reflect a lack of recording effort.

## 5.2 Habitat Survey

### 5.2.1 The Site

Features described below are shown on the habitat map Figure 1538/1/1 in the Appendix.

The total area of the Site was 6353 m<sup>2</sup> (For the purposes of area calculations for the BNG which uses hectares, this has been rounded to 0.64 hectares).

No notable or rare habitats or species were recorded.

The Site comprised the following habitat types:-

- u1b Buildings, hard paved and bound surfaces (Developed land; sealed surface)
- u1c Unsealed bare surfaces (Artificial unvegetated, unsealed surface).
- u1d Suburban/mosaic of developed/natural surface including grassland and ornamental shrub beds and planters (vegetated garden).
- w1g6 Tree canopy overhanging sealed surface and introduced shrub.

Habitat types are described below in more detail:

*Boundary introduced shrubs and trees:*

*Trees* – Eight individual isolated trees 12-18 m tall, including Cedar *Cedrus* spp., Lawson Cypress *Cupressus lawsoniana*, Lime *Tilia* sp., Norway Maple *Acer platanoides*, Pin Oak *Quercus palustris*, and Scots Pine *Pinus sylvestris*. Additionally, there are small groups of trees (individuals 8-15 m tall), including False Acacia *Robinia pseudoacacia*, Horse Chestnut *Aesculus hippocastanum*, Leyland Cypress, Lime *Tilia* sp., Norway Maple, and Pin Oak.

*Introduced shrubs* on boundaries included a mixture of some native and non-native planting. Species such as Bramble will have a self-sown origin: Blackthorn *Prunus spinosa*, Bramble *Rubus fruticosus* agg., Cherry Laurel *Prunus laurocerasus*, Climbing Hydrangea *Hydrangea petiolaris*, Common Elder *Sambucus nigra*, Common Ivy *Hedera helix*, Common Snowberry *Symphoricarpos albus*, David's Viburnum *Viburnum davidii*, Dog Rose *Rosa canina*, Japanese Aralia *Fatsia japonica*, Japanese Mahonia *Mahonia japonica*, Portuguese Laurel *Prunus lusitanica*, Privet *Ligustrum vulgare*, Rhododendron *Rhododendron* sp., and Spotted Laurel *Aucuba japonica* *Crotonifolia*.

*Introduced shrubs* Internal - low-height ornamental planting comprised primarily Fortune's (evergreen) Spindle *Euonymus fortunei* 'Silver Queen' or similar varietal variety.

Open habitats of *modified grassland* (lawn with forbs) included: grasses present were typical of those found in domestic lawns (occasional individuals occurring in shrub beds included) - Annual Meadow-grass *Poa annua*, Cock's-foot *Dactylis glomerata*, False Oat-grass *Arrhenatherum elatius*, Perennial Rye-grass *Lolium perenne* (dominant in lawn areas) and Red Fescue *Festuca rubra*. Forbs included Cleavers *Galium aparine*, Common Mallow *Malva sylvestris*, Common

Nettle *Urtica dioica*, Common Ragwort *Jacobaea vulgaris*, Creeping Buttercup *Ranunculus repens*, Cut-leaved Crane's-bill *Geranium dissectum*, Daisy *Bellis perennis*, Dandelion *Taraxacum officinale* agg., Ground Ivy *Glechoma hederacea*, Herb-Robert *Geranium robertianum*, and Ribwort Plantain *Plantago lanceolata*.

### 5.2.2 Adjacent Habitats

The Site is surrounded by urban infrastructure, including major roads, car parks and buildings. The only significant vegetation is scattered urban trees and tree lines and small areas of short-mown grass. The nearest significant open space lies at least 700 m away.

### 5.3 **Scoping for Protected and Biodiversity Species**

- The presence of buildings and trees indicated the potential for bats and a roost assessment survey was conducted where practical.
- Great Crested Newts - This species was included within the assessment on account of suitable terrestrial habitat, potentially suitable breeding ponds within 250 m of the Site and records within 2 km.
- Reptiles - Grass Snake, Slow-worm and Common Lizard were excluded from the assessment on account of a lack of suitable habitats and records.
- Badger - this species was excluded from the assessment on account of a lack of suitable habitats.
- Birds - common nesting bird species were present in the surrounding area. While further surveys are not required, mitigation to reduce impacts on nesting birds is recommended.
- Invasive species - habitats were suitable, although none were seen.

Other species - No other Section 41 Priority or rare species are expected to be impacted by the proposed development.

### 5.4 **Preliminary Bat Roost Assessment**

#### 5.4.1 Building Roost Potential

Details of Buildings Surveyed and roost evidence/suitability are provided in Table 5.3. A Habitat map/plan and Photographs of the buildings surveyed are shown in the Appendix 1.

**Table 5.3: PBRA Buildings Results**

<b>Building reference and Description</b>	<b>Bat Evidence and Roost Suitability</b>	<b>Further surveys</b>
<b>B1 Main former Hotel Building:</b> Several storey structures with glass, brick and timber clad cavity walls and flat roof. No loft spaces.	No evidence of bat roost activity. Negligible suitability as not internal or external features capable of supporting bats.  No evidence of birds nesting.	None
<b>B2 Storage cabin at the rear of the site:</b> Construction of timber-clad walls with a flat roof of bitumen felt.	No bat roost evidence and negligible roost suitability.	None
<b>B3 Utility Structure at the front of Hotel:</b> Brick shed with a flat roof of bitumen felt.	No bat roost evidence and negligible roost suitability.	None



<b>B4 Utility Structure at the side of Hotel:</b> Brick shed with a flat roof of bitumen felt.	No bat roost evidence and negligible roost suitability.	None
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#### 5.4.2 Tree Roost Potential

None of the trees within the site boundary held any discernible bat roost potential, and no further surveys would be required.

#### 5.4.3 Bat Foraging and Commuting Habitat

The boundary trees offer moderate suitability habitat for bat activity forming part of a vegetated feature that links to other sites and the broader landscape. Trees offer habitat for aerial invertebrates and add to the Site's bat foraging resource. No further surveys would be required to quantify activity levels as these are unlikely to be significant.

### 5.5 **Great Crested Newt**

No evidence of Great Crested Newts was found during the survey. Suitable terrestrial habitat was absent from the Site. While wetlands occur within 250 m, these are ornamental lakes and ponds within an urban setting. Additionally, these ponds lie more than 600 m from known Great Crested Newt populations. Whilst Great Crested Newts may travel this distance, the habitat between existing populations and the ponds is severed by major roads and is entirely urban. It is therefore considered that the potential risk to Great Crested Newts from clearance of the Site is negligible and requires no further consideration.

### 5.6 **Birds**

Several common bird species were active in the shrubs and trees around the site. While no evidence of nesting was recorded, it is assumed that a small number of nests may be present in established vegetation. Consequently, avoidance of disturbance to nesting birds will be a requirement with respect to mitigation and programming.

### 5.7 **Other Protected and Notable Species**

No direct evidence of other protected or notable species was recorded, including for Badger and Hedgehog.

## 6 **DISCUSSION & ANALYSIS OF RESULTS**

### 6.1 **Discussion**

#### 6.1.1 Desk Study

No sites of ecological value will be impacted by the proposed redevelopment, primarily on account of the distance they lie from the Site and the nature of intervening urban landscapes. Equally, the desk study did not identify any protected or notable species that will be adversely impacted. With adequate mitigation, potential impacts from redevelopment such as those arising from lighting will have a negligible impact on the surrounding landscape.

#### 6.1.2 Bats

No evidence of bat roosting activity was recorded and all buildings and trees were categorised as negligible holding suitability. The boundary habitats were of moderate suitability for foraging and commuting and should be protected through mitigation of potential lighting impacts. Bat

roosts are not at risk, while redevelopment offers the capacity to enhance roost opportunities and improve foraging resources.

#### 6.1.3 Birds

Common bird species are likely to nest within the Site. Consequently, risk avoidance measures will be required to ensure nesting birds are not disturbed.

#### 6.1.4 Other Species

There was no evidence of utilisation by other protected or notable species.

### 6.2 **Evaluation**

The Site was evaluated within the Zone of Influence level of value, i.e., it includes nil or very low ecological value, although the immediate surrounding areas and habitats may be affected by the proposed project and associated activities. Influence may arise from additional unmitigated or extraneous lighting and disturbance to vegetation during construction. However, in the context of the urban setting, potential unique or cumulative impacts on adjacent habitats are likely to be negligible once mitigated.

## 7 **RECOMMENDATIONS**

### 7.1 **Further Surveys**

No further ecological surveys are required on account of an absence of protected and notable species and habitats and negligible suitability to sustain significant species. While boundary vegetation offers moderate suitability for bat foraging, levels are anticipated to be sufficiently low so as to fall below any threshold where further evaluation is necessary.

### 7.2 **Mitigation**

Mitigation will include construction and clearance risk avoidance measures, wildlife-friendly construction phase working practices and control of nocturnal illumination.

#### 7.2.1 Lighting Mitigation

To ensure detrimental lighting impacts on bats using the Site are avoided, there should be limited increased light spillage onto the surrounding boundary habitats and any new roost spaces provided. Lighting should be restricted to the lowest level of illumination required for safety and security and only where needed.

The following measures should be implemented within the lighting scheme:

- New column-mounted luminaires, lighting bollards, and wall-mounted luminaires should be selected, sited, and angled such that they do not spill unnecessary light onto areas where illumination is not required so that there is no significant increased light trespass on to existing nocturnally dark habitats where bats forage and commute.
- Ensure new LED luminaires have dimming capability, a warm white spectrum (ideally less than 2700, but below 3500 Kelvin) with peak wavelengths higher than 550 nm and with no U.V. output.

- Where security lamps are used, these should use a trigger to illuminate them (e.g., passive infra-red detector) and switch off after a short period (ideally 1 minute), rather than remaining on all night, and generally, lights should be switched off when not required.

Further guidance is available in Bats and artificial lighting (ILP 2018).

### 7.2.2 Site clearance and Construction Phase Working Practices

A copy of this section of this report should be retained on Site during the course of the clearance, demolition and construction work. All Site operatives should be made aware of its contents where it is relevant to the tasks they are undertaking.

All species of bird are offered protection under the Wildlife and Countryside Act 1981 (as amended) when nesting or preparing nests (typically, but not exclusively, between March and August inclusive). As such, removal of vegetation should be carried out outside of the breeding bird season (so, between September and February inclusive) to avoid disturbing or destroying active nests. Should this time frame be unfeasible, it is recommended that prior to the commencement of works, a nesting bird check is carried out by a suitably qualified ecologist (SQE), although checks at all times of year are recommended. If active nests are observed, vegetation will need to be left alone until the ecologist is satisfied that the young have successfully fledged.

Should protected species be found during site clearance, demolition or construction, work will stop, and an appropriately licensed ecologist will be contacted immediately for advice. Protected species should not be handled unless they are an immediate and unavoidable danger\*. If this arises, then the ecologist should be contacted immediately, and the animal secured in a secure ventilated container and stored in a shady location prior to release by the ecologist. [\*Bats should only ever be handled with gloves, taking care not to injure the animal but also avoid being bitten – seek emergency medical attention if bitten by a bat no matter how trivial the wound].

The following recommendations should be followed in specific situations where a risk to wildlife is likely to arise:

- ▶ Areas of grass should be maintained as short-mown sward (less than 150 mm high) throughout the pre-construction period to ensure that it does not become a favourable habitat for species that may then be harmed during the works. When cutting longer vegetation, extreme care should be taken not to harm reptiles, amphibians, or mammals seeking refuge, and in all cases, the area should be checked before cutting commences.
- ▶ Prior to the commencement of work each day, a brief site walkover will be undertaken by construction personnel to ensure no protected species have entered the construction site overnight, particularly any excavations.
- ▶ During the clearance of debris and timber and rubble piles, care should be taken by checking these before moving to ensure that wildlife is not seeking refuge. It is advisable that only building products to be used on the day are brought and stored on the site. If building products need to be stored on-site (e.g., overnight or for a few days), these products will be stored on pallettes or retained in bags on pallettes to ensure that refuges are not created that will attract wildlife. Where possible, building products should be placed on hard standings.

- ▶ All excavations created during construction (e.g., for foundations or services) should be filled in and finished on the same day so as not to leave any traps into which animals might fall. If this is unavoidable, then an escape route is to be provided overnight, which can be in the form of a wooden plank cut into the bank to provide a ramp; or the hole is entirely covered by a heavy sheet or slab flush to the surrounding ground and without holes at the sides, so to exclude amphibians from crawling beneath. If in doubt, soil should be piled over the side of the slab to seal the edges.
- ▶ Any spoil resulting from any excavations should be removed from the construction area on the same day and will be taken off-site or placed on hard standing or on palettes to be removed later. This will deter small animals from hiding within materials.
- ▶ Security and work floodlighting should only be used where necessary to avoid any potential detrimental impacts during construction on commuting bats. These lights should not continually illuminate boundary vegetation during hours of darkness. The principles outlined above and set out in the Institute of Lighting Professional's Guidance Note should also be applied to construction phase lighting.

### 7.3 Enhancements

#### 7.3.1 General Principles

In accordance with the National Planning Policy Framework, which seeks to ensure that all new development includes biodiversity enhancements, the following provision will be included within the works. Careful consideration will be given to the features that are effective and supported by conservation evidence, i.e., they are known to benefit the target species.

#### 7.3.2 Landscape Proposals Supporting Biodiversity

The proposals include vegetated areas on three levels (ground, first and fifth floors). Specifically, 1,300 m<sup>2</sup> of new planting comprises a significant component that will attract pollinating insects and other invertebrates. In turn, this will provide foraging opportunities for birds and bats.

Almost 300 m<sup>2</sup> of wildflowers will be introduced as turf with an additional 26 m<sup>2</sup> of bulbs. The proposals include 28 new trees to offset those unavoidably lost during site clearance.

Overall, the landscape proposals will deliver a net gain in semi-natural habitat area but also a substantial gain in species which benefit invertebrate wildlife.

#### 7.3.3 Bird Nesting, Bat Roosting and Insect Boxes

The proposals will include provision for nesting Common Swift *Apus apus*, for roosting bats (primarily pipistrelles) and, near landscape areas, boxes for nesting insects.

- No fewer than 20 Swift nesting boxes will be integrated into the walls of the building on or above the fifth floor. These will be positioned to have clear flight lines, free of obstacles. They will comprise Action-for-Swift S-Boxes with slip faces to match the chosen brickwork (<https://actionforswifts.blogspot.com/p/s-brick.html>).
- Four Bat Roosting opportunities will be provided in the form of wall integrated boxes or bat tubes. These will be located away from bedroom walls, windows and balconies.
- Five Invertebrate boxes will be provided adjacent to shrub and herbaceous planting and wildflowers to encourage important pollinating and predatorial species.

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## 8 CONCLUSIONS

The Former Beales Hotel site held no evidence of and negligible suitability for protected and notable species. No further ecological surveys will be required prior to planning consent determination.

Redevelopment offers scope for including enhancements for biodiversity, and these have been detailed within the report.

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## **APPENDIX**

### **Figure 1538/1/1 Habitat Map**

#### **Photographs**



Figure 1538/1/1 Habitat Map

PHOTOGRAPHS



Photograph 1 (left): Front (south-east) elevation of the former hotel looking west; Photograph 2 (right) – Side (northeast) elevation looking north-west.



Photograph 3 (left): Rear (north-west) elevation looking west. Photograph 4 (right) – Side (south-west) elevation looking north.



Photograph 5 (left): Roof looking south-west; Photograph 6 (right) - Storage shed behind the rear of the hotel (just appearing in Photograph 3).





Photograph 7 (left) – Car parking area to the west of the hotel looking north; Photograph 8 (right) – The western boundary of the car park comprising a clipped shrub bed primarily outside of the site in the adjacent land.



Photograph 9 (left) - Northern boundary of non-native trees and shrubs; Photograph 10 (right) - Eastern boundary planting comprising ornamentals shrubs and short-mown lawn (looking south).



Photograph 11 (left)- Courtyard immediately adjacent the north-east elevation of the hotel (looking east); Photograph 12 (right) - three Leyland cypress and entrance parking area in front of hotel's south-east elevation (looking north-east).