

# Anglia Square, Norwich Ecological Assessment

Dated March 2022

**Weston  
Homes**



WESTON HOMES



**ECOLOGY SOLUTIONS**

Part of the ES Group

ANGLIA SQUARE,  
NORWICH

## **Ecological Assessment**

March 2022  
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## 1. INTRODUCTION

- 1.1. This Ecological Assessment has been prepared by Ecology Solutions on behalf of Weston Homes Plc (the Applicant) in support of a hybrid (part full / part outline) planning application (the Application), submitted to Norwich City Council (NCC) for the comprehensive redevelopment of Anglia Square and various parcels of mostly open surrounding land (the Site), as shown within a red line on drawing 'ZZ-00-DR-A-01-0200'.
- 1.2. The Site is located in a highly accessible position within the northern part of Norwich City Centre and comprises a significant element of the Anglia Square / Magdalen Street / St Augustines Large District Centre, (the LDC). It is thus of strategic importance to the City, and accordingly has been identified for redevelopment for many years within various local planning policy documents, including the Northern City Centre Area Action Plan 2010 (NCCAAP) (now expired), the Joint Core Strategy for Broadland, Norwich and South Norfolk 2014 (JCS), and NCC's Anglia Square and Surrounding Area Policy Guidance Note 2017 (PGN). The Site forms the principal part of an allocation (GNLP 0506) in the emerging Greater Norwich Local Plan (GNLP).
- 1.3. This application follows a previous application on a somewhat smaller development parcel, (NCC Ref. 18/00330/F) made jointly by Weston Homes Plc as development partner and Columbia Threadneedle Investments (CTI), the Site's owner, for a residential-led mixed use scheme consisting of up to 1,250 dwellings with decked parking, and 11,000 sqm GEA flexible ground floor retail / commercial / non-residential institution floorspace, hotel, cinema, multi-storey public car park, place of worship, and associated public realm and highway works. This was subject to a Call-in by the Secretary of State (PINS Ref. APP/G2625/V/19/3225505) who refused planning permission on 12th November 2020 (the 'Call in Scheme').
- 1.4. In April 2021, following new negotiations with Site owner CTI, Weston Homes decided to explore the potential for securing planning permission for an alternative scheme via an extensive programme of public and stakeholder engagement, from the earliest concepts to a fully worked up application. The negotiations with CTI have secured a "Subject to Planning" contract to purchase the Site, (enlarged to include the southeastern part of Anglia Square fronting Magdalen Street and St Crispins Road), which has enabled a completely fresh approach to establishing a redevelopment scheme for Anglia Square. This has resulted in a different development brief for the scheme, being to create a replacement part of the larger LDC suited to the flexible needs of a wide range of retail, service, business and community uses, reflective of trends in town centre character, integrated with the introduction of homes across the Site, within a highly permeable layout, well connected to its surroundings.
- 1.5. The new development proposal seeks to comprehensively redevelop the Site to provide up to 1,100 dwellings and up to 8,000sqm (NIA) flexible retail, commercial and other non-residential floorspace including Community Hub, up to 450 car parking spaces (at least 95% spaces for class C3 use, and up to 5% for class E / F1 / F2 / Sui Generis uses), car club spaces and associated works to the highway and public realm areas (the Proposed Development). These figures are maxima in view of the hybrid nature of the application. This proposes part of the scheme designed in full, to accommodate 367 dwellings, 5,808 sqm non-residential floorspace, and 146 car parking spaces (at least 95% spaces for residential use, and up to 5% for non-residential use), with the remaining large

part of the Site for later detailed design as a Reserved Matters application, up to those maxima figures.

- 1.6. This Ecological Assessment provides Norwich City Council with information regarding the ecological interest of the Site. The importance of the habitats within the Site are evaluated with due consideration given to the guidance published by the Chartered Institute of Ecology and Environmental Management (CIEEM)<sup>1</sup>.
- 1.7. Where necessary, mitigation measures are recommended so as to safeguard any significant existing ecological interest within the Site and, where appropriate, potential enhancement measures are put forward and reference made to both Priority Species and Priority Habitats (formerly National and Local Biodiversity Habitat Plans).

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<sup>1</sup>CIEEM (2018). *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine*. Version 1.1 – Updated September 2019. Chartered Institute of Ecology and Environmental Management, Winchester.

## **2. SURVEY METHODOLOGY**

2.1. The methodology utilised for the survey work can be split into three areas, namely desk study, habitat survey and faunal survey. These are discussed in more detail below.

### **2.2. Desk Study**

2.2.1. In order to compile background information on the Site and the surrounding area, Ecology Solutions contacted Norfolk Biodiversity Information Service (NBIS).

2.2.2. Further information on designated sites from a wider search area was obtained from the online Multi-Agency Geographic Information for the Countryside (MAGIC)<sup>2</sup> database, which uses information held by Natural England and other organisations. This information is reproduced in Appendix 1 and where appropriate on Plan ECO1.

### **2.3. Habitat Survey**

2.3.1. Initial habitat surveys were carried out by Wildlife Matters in February 2016 and December 2017. Ecology Solutions conducted updated walkover surveys in July 2018 and January 2022, in order to ascertain the general ecological value of the land contained within the boundaries of the Site and to identify the main habitats and associated plant species.

2.3.2. The site was surveyed based around Extended Phase 1 Habitat Survey methodology<sup>3</sup>, as recommended by Natural England, whereby the habitat types present are identified and mapped, together with an assessment of the species composition of each habitat. This technique provides an inventory of the basic habitat types present and allows identification of areas of greater potential which require further survey. Any such areas identified can then be examined in more detail.

### **2.4. Faunal Survey**

2.4.1. Obvious faunal activity, such as birds or mammals observed visually or by call during the course of the surveys, was recorded. Specific attention was paid to any potential use of the Site by protected species, Priority Species (formerly Biodiversity Action Plan (BAP) species), or other notable species.

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<sup>2</sup> <http://www.magic.gov.uk>

<sup>3</sup> Joint Nature Conservation Committee (2010). *Handbook for Phase 1 Habitat Survey – a Technique for Environmental Audit*. England Field Unit, Nature Conservancy Council, reprinted JNCC, Peterborough.



### 3. ECOLOGICAL FEATURES

3.1. The following main habitat / vegetation types were identified within the Site during the survey undertaken:

- Buildings;
- Amenity Grassland;
- Trees; and
- Hardstanding.

3.2. The locations of these habitats are shown on Plan ECO2.

#### 3.3. Buildings

3.3.1. Building B1 is a purpose-built office block known as Gildengate House (see Photograph 1). It is a six-storey building in a reasonable state of repair. It is of concrete, brick and glass construction. The building is currently used on a temporary basis as an artists' studio. Cracks and gaps are present on the stair column where concrete lintels are beginning to crack. Gaps are also present under the steel cladding on the edge of the roof.

3.3.2. Building B1a is a small single storey extension to building B1 (see Photograph 2). It has a flat felt roof with slate sides. The building is currently used as a temporary gym, but was previously used as retail units.

3.3.3. Building B2 is a disused two-storey steel and concrete retail unit with a flat steel roof. It is in a reasonable state of repair (see Photograph 3).

3.3.4. Building B3 is a seven-storey former office block (currently disused) known as Sovereign House (see Photograph 4). It is of steel, glass and concrete construction. Numerous gaps are present along the steel cladding. This building has a flat roof.

3.3.5. Building B4 is a multi-storey car park which has been closed to the public due to standard safety concerns. The building is a seven-storey brick-built construction with a flat roof (see Photograph 5). Cracks in the brick wall are visible.

3.3.6. Building B5 is a four-storey cinema complex of concrete and glass construction, with a pitched corrugated metal roof (see Photograph 6). It is in a poor state of repair, although there are no apparent gaps or cracks.

3.3.7. Building B6 is a two-storey brick building with a flat roof and slopping sides of artificial slate tiles, with metal cladding. The building is in a reasonable state of repair and used for retail purposes. The upper storey is disused.

3.3.8. Building B7 is known as Surrey Chapel and is a two-storey brick building with concrete panels and a flat roof (see Photograph 7). This building is outside of the application submission and is an enclave within the Site.

3.3.9. Building B8 is a two-storey complex of disused units. It is brick built with a pitched roof of concrete pantiles (see Photograph 8). Chimneys with lead flashing are also present. The roofing felt on the gable end is lifting, and

some gaps are present. The wooden soffit boxes are in good condition. A loft space is present in the south of the building. The plastic lining and wooden beams of the loft are in good condition. There are no obvious gaps in the lining or staining on the beams (see Photograph 9).

- 3.3.10. Building B9 is an older building than the others (see Photograph 10). It is currently unused but was previously used as a warehouse. It is a single storey building of brick, flint and metal construction, with wooden barge boards and a pitched concrete pantile roof. The roof appears to have been replaced relatively recently as it is in a good condition. There are gaps present along the wooden barge boards and wooden lintel, as well as between the doors. Internally the building contains a large number of cobwebs. The lining of the loft is in good condition with very few gaps present, plastic skylights mean the loft is very bright. A large number of cobwebs are present along the gaps by the doors (see Photograph 11).
- 3.3.11. Building B10 is a single-storey electrical substation of brick construction with a flat felt roof. This building is in good condition.
- 3.3.12. Building B11 is a two-storey brick building with a pitched / hipped concrete tile roof, with wooden soffit boxes (see Photograph 12). There are no obvious gaps present. The building is currently occupied by a printing business. There is no loft space present. A separate single storey storage unit with steel sliding doors is present to the rear of building B11, currently used as a storage facility by Scope. This warehouse has metal roofing panels with plastic skylights. There is a large Ivy-covered wall to the rear of the building (see Photograph 13).
- 3.3.13. Building B12 is a two-storey brick-built building adjoining building B11. It has a felt corrugated steel roof (see Photograph 12).
- 3.3.14. Building B13 is not included within the hybrid application site boundary, but is an enclave within the Site. It is a two-storey brick-built building with a flat roof with artificial slates around the edge (see Photograph 14). The building is in good condition with no obvious gaps.
- 3.3.15. Building B14 is a two-storey brick-built building with a flat roof and artificial slate panelling, with timber cladding. It is currently used as a retail unit and office. The building is in a reasonable state of repair.

#### 3.4. **Amenity Grassland**

- 3.4.1. To the south of Buildings B1 and B2 is an area of amenity grassland characterised by a short sward length.

#### 3.5. **Trees**

- 3.5.1. Several trees are present within or adjacent to the Site. Nine London Planes *Platanus x hispanica* are present on the southern boundary with St Crispins Road, which along with the Common Limes *Tilia platyphyllos x cordata* also present are the most significant area of vegetation within the Site. A Silver Birch *Betula pendula* is also present on the boundary. Elsewhere within and adjacent to the Site are specimens of Silver Maple *Acer saccharinum*, Common Lime, Large-leaved Lime *Tilia platyphyllos*, Sycamore *Acer pseudoplatanus*, Red Oak *Quercus rubra* and Whitebeam

*Sorbus aria*. A group of Sycamore, Laburnum *Laburnum anagyroides* and Elder *Sambucus nigra* is present to the east of Building B10.

### 3.6. Hardstanding

- 3.6.1. Hardstanding constitutes the largest portion of habitats on site and comprises roads and car parking. Towards the centre of the Site is Anglia Square, a concrete plaza with a steel and glass cover, surrounded by undercroft retail units. The site comprises early colonising and opportunistic plant species of no ecological value.

### 3.7. Invasive Non-Native Species

- 3.7.1. *Buddleia Buddleja davidii* was identified within the Site.

### 3.8. Background Records

- 3.8.1. Eight plant records were returned in the last ten years from the data search.
- 3.8.2. The data search returned seven records of plants listed on Schedule 9 Part II of the Wildlife & Countryside Act 1981, comprising Giant Hogweed *Heracleum mantegazzianum* and Japanese Knotweed *Fallopia japonica*. The closest record is of Japanese Knotweed, located approximately 0.7km northwest of the Site on Barker Street, dating from 2016. The most recent record is also of Japanese Knotweed, situated approximately 1.2km northwest of the Site, dating from 2017.
- 3.8.3. A single record of non-native Indian Balsam *Impatiens glandulifera* was also returned by the data search.

#### 4. WILDLIFE USE OF THE SITE

4.1. General observations were made during the surveys of any faunal use of the Site, with specific attention paid to the potential presence of protected species.

##### 4.2. Bats

4.2.1. The results of the bat surveys conducted in July 2018 are presented within the Bat Survey Report issued in August 2018. The situation regarding bats on site remains unchanged since the earlier report, with the buildings being in the same condition. No further work was completed in 2021 and the earlier results remain valid. In summary, no bats were recorded during emergence surveys undertaken, with a very low level of activity recorded during the activity survey and static detector deployment. It is noted that the cinema (Building B5) has been disused for more than a year, but this does not alter the conclusions drawn.

4.2.2. The data search returned a total of 270 records of bat species from the past ten years recorded within the search area. These records relate to several species including Common Pipistrelle *Pipistrellus pipistrellus*, Soprano Pipistrelle *Pipistrellus pygmaeus*, Nathusius' Pipistrelle *Pipistrellus nathusii*, Brown Long-eared Bat *Plecotus auritus*, Daubenton's Bat *Myotis daubentonii*, Natterer's Bat *Myotis nattereri*, Noctule *Nyctalus noctula*, Serotine *Eptesicus serotinus*, Barbastelle *Barbastella barbastellus*, and Whiskered / Brandt's Bat *Myotis mystacinus* / *Myotis brandtii*.

4.2.3. The closest of these records are located within a 1km grid square which encompasses the western half of the Site, between approximately 0 and 1.1km away. Five records are situated here, two of which are attributed to a Pipistrelle species, one dating from 2012 and the other 2016. One record each of Soprano Pipistrelle, Noctule, Daubenton's Bat were also recorded within this grid square, all dating from 2016. A further record of Soprano Pipistrelle was located within a 1km grid square encompassing the eastern half of the Site, between approximately 0 and 1km away. This record was dated 2012.

4.2.4. The most recent records relate to an area approximately 0.9km northwest of the Site and pertain to Common Pipistrelle and Soprano Pipistrelle. These records are dated 2019.

4.2.5. The remaining bat records are located to the north, east, south, and west of the Site. Many of these records are situated within or near to vegetated areas within Norwich, including Train Wood County Wildlife Site and alongside the River Wensum. Records are also located within residential areas.

##### 4.3. Badgers

4.3.1. No evidence of Badger *Meles meles* was recorded on site or immediately adjacent to the Site. The site and surrounding area are wholly unsuitable for the species.

4.3.2. No records of Badger were returned from the data search.

#### 4.4. Other Mammals

- 4.4.1. Given that the Site is highly urbanised, it is unlikely that mammals will be utilising the area to a great extent. The surrounding area, however, does comprise interconnected vegetated areas which may provide opportunities for foraging and dispersing Hedgehog *Erinaceus europaeus*, although no evidence of this species was recorded on site.
- 4.4.2. Wildlife Matters recorded evidence of mammal presence. Evidence of Fox *Vulpes vulpes* was discovered on site, through the identification of footprints and faeces. Evidence of Brown Rat *Rattus norvegicus* was also recorded. A Cat *Felis catus* was also observed on site.
- 4.4.3. The data search returned a total of 37 records of mammal species, excluding bats. These species included Chinese Muntjac *Muntiacus reevesi*, Hedgehog, and Otter *Lutra lutra*.
- 4.4.4. The closest of these records are situated within a 1km grid square which encompasses the Site. Three records of Hedgehog are located here, dating from 2015. The most recent record of Hedgehog was from 2018, located approximately 1km northeast of the Site.
- 4.4.5. The most recent record pertained to Otter, approximately 1km northwest of the Site in the River Wensum. This record referred to three individuals dating from 2018. The closest record of Otter was approximately 0.2km southwest of the Site, also in the River Wensum.

#### 4.5. Birds

- 4.5.1. The mature trees within the Site present suitable nesting opportunities for breeding birds, as do the trees located immediately off site and further afield in the residential areas.
- 4.5.2. Six species of bird were observed within the Site. These included Blackbird *Turdus merula*, Black-headed Gull *Chroicocephalus ridibundus*, Carrion Crow *Corvus corone*, Dunnock *Prunella modularis*, Feral Pigeon *Columba livia*, and Robin *Erithacus rubecula*.
- 4.5.3. At the time of the surveys conducted by Wildlife Matters, Blackbird, Dunnock and Robin were thought to be breeding in the western portion of the Site. Feral Pigeons were also found to be nesting in the buildings on site during the time of these surveys.
- 4.5.4. The data search returned 190 records of bird species. These species included Black Redstart *Phoenicurus ochruros*, Blue Tit *Cyanistes caeruleus*, Coal Tit *Periparus ater*, Common Crossbill *Loxia curvirostra*, Common Sandpiper *Actitis hypoleucos*, Egyptian Goose *Alopochen aegyptiacus*, Fieldfare *Turdus pilaris*, Firecrest *Regulus ignicapillus*, Goldcrest *Regulus regulus*, Grey Wagtail *Motacilla cinerea*, House Martin *Delichon urbicum*, House Sparrow *Passer domesticus*, Kestrel *Falco tinnunculus*, Little Egret *Egretta garzetta*, Little Gull *Hydrocoloeus minutus*, Merlin *Falco columbarius*, Nightjar *Caprimulgus europaeus*, Oystercatcher *Haematopus ostralegus*, Peregrine *Falco peregrinus*, Pied Flycatcher *Ficedula hypoleuca*, Pied Wagtail *Motacilla alba*, Pink-footed Goose *Anser brachyrhynchus*, Pochard *Aythya ferina*, Redwing *Turdus iliacus*, Ring

Ouzel *Turdus torquatus*, Robin *Erithacus rubecula*, Sand Martin *Riparia riparia*, Shag *Phalacrocorax aristotelis*, Siskin *Carduelis spinus*, Song Thrush *Turdus philomelos*, Swift *Apus apus*, Tawny Owl *Strix aluco*, Waxwing *Bombycilla garrulus*, Whimbrel *Numenius phaeopus*, Whooper Swan *Cygnus cygnus*, Willow Warbler *Phylloscopus trochilus*, Woodcock *Scolopax rusticola*, Wren *Troglodytes troglodytes*, and Wryneck *Jynx torquilla*.

4.5.5. The closest of these records were located within two separate 1km grid squares, encompassing both the western and eastern portions of the Site. Fourteen records were located between approximately 0 and 1.1km to the northwest. Twelve of these records refer to Waxwing, nine of which date from 2012, two from 2014, and one from 2013. A single record of Grey Wagtail dating from 2013 and one record of Siskin dating from 2013 were also found within this area. Nine additional records were located to the northeast between approximately 0 and 1km away from the Site. Four of these records pertain to Waxwing, three of which date from 2012 and one from 2013. A single record each of Fieldfare, Grey Wagtail, Woodcock, Common Sandpiper, and Shag, all dating from 2013 were also recorded within this area.

4.5.6. The most recent record related to a 1km grid square between approximately 0.9 and 2.3km southwest of the Site. The record referred to Waxwing and was dated 2016.

#### 4.6. Reptiles

4.6.1. No reptiles were observed on site or immediately adjacent to the Site. The habitats present are wholly unsuitable for reptile species.

4.6.2. No records of reptiles were returned by the data search within the past ten years.

#### 4.7. Amphibians (Great Crested Newts)

4.7.1. There is no suitable aquatic breeding habitat within the Site. The habitats on site are unsuitable for amphibians in their terrestrial phase and their presence on site is considered to be highly unlikely.

4.7.2. No amphibians were returned by the data search within the past ten years.

#### 4.8. Invertebrates

4.8.1. Given the habitats present, it is likely a common assemblage of invertebrate species would be present within the Site. There is no evidence to suggest any notable species would be present.

4.8.2. A male Brimstone Butterfly *Gonepteryx rhamni* was identified within the Site during the initial surveys conducted by Wildlife Matters, near to Building B12. Additional species sightings included Bluebottle Fly *Calliphora vomitoria*, Greenbottle Fly *Lucilia caesar*, Housefly *Musca domestica*, and Flesh Fly *Sarcophaga carnaria*.

4.8.3. A total of 30 records detailing invertebrate species were returned by the data search. These records included 14 species, all of which are

considered as priority by the UK Biodiversity Action Plan (BAP) and listed under Section 41 of the NERC Act 2006. These species included August Thorn Moth *Ennomos quercinaria*, Brown-spot Pinion Moth *Agrochola litura*, Buff Ermine Moth *Spilosoma lutea*, Centre-barred Sallow Moth *Atethmia centrigo*, Cinnabar Moth *Tyria jacobaeae*, Crescent Moth *Helotropha leucostigma*, Dark Spinach Moth *Pelurga comitata*, Dot Moth *Melanchra persicariae*, Large Garden Bumblebee *Bombus ruderatus*, Mouse Moth *Amphipyra tragopoginis*, Rosy Rustic Moth *Hydraecia micacea*, Rustic Moth *Hoplodrina blanda*, Small Emerald Moth *Hemistola chrysoprasaria*, and White-line Dart Moth *Euxoa tritici*.

- 4.8.4. The closest of these records are located within two separate 1km grid squares, between approximately 0.5 and 1.8km northwest and northeast of the Site. A single record of August Thorn Moth is located to the northwest and dates from 2016. Fourteen records are situated to the northeast and constitute two records of August Thorn Moth dating from 2013 and 2015, one record each of Buff Ermine Moth dating from 2013, Cinnabar Moth dating from 2012, Rustic Moth dating from 2013, Brown-spot Pinion Moth dating from 2014, and Centre-barred Sallow Moth dating from 2015. A further six records can be attributed to Dot Moth, dating from 2013, 2014, and 2015, in addition to one record of White-line Dart Moth dating from 2015.
- 4.8.5. The closest record refers to August Thorn Moth, situated in the aforementioned northwestern grid square and dates from 2016.

## 5. ECOLOGICAL EVALUATION

### 5.1. The Principles of Ecological Evaluation

- 5.1.1. The guidelines for ecological evaluation produced by CIEEM propose an approach that involves professional judgement, but makes use of available guidance and information, such as the distribution and status of the species or features within the locality of the project.
- 5.1.2. The methods and standards for site evaluation within the British Isles have remained those defined by Ratcliffe<sup>4</sup>. These are broadly used across the United Kingdom to rank sites so priorities for nature conservation can be attained. For example, current Sites of Special Scientific Interest (SSSI) designation maintains a system of data analysis that is roughly tested against Ratcliffe's criteria.
- 5.1.3. In general terms, these criteria are size, diversity, naturalness, rarity and fragility, while additional secondary criteria of typicalness, potential value, intrinsic appeal, recorded history and the position within the ecological / geographical units are also incorporated into the ranking procedure.
- 5.1.4. Any assessment should not judge sites in isolation from others, since several habitats may combine to make it worthy of importance to nature conservation.
- 5.1.5. Further, relying on the national criteria would undoubtedly distort the local variation in assessment and therefore additional factors need to be taken into account, e.g. a woodland type with a comparatively poor species diversity, common in the south of England, may be of importance at its northern limits, say in the border country.
- 5.1.6. In addition, habitats of local importance are often highlighted within a local Biodiversity Action Plan (BAP). The Norfolk Biodiversity Action Plan has been considered as part of this assessment and is referenced where relevant.
- 5.1.7. Levels of importance can be determined within a defined geographical context from the immediate site or locality through to the international level.
- 5.1.8. The legislative and planning policy context are also important considerations and have been given due regard throughout this assessment.

### 5.2. Habitat Evaluation

#### *Designated Sites*

- 5.2.1. **Statutory Sites.** There are no statutory sites within or directly adjacent to the Site.
- 5.2.2. The closest statutory sites are St James' Pit SSSI and Mousehold Heath Local Nature Reserve (LNR), each located approximately 0.9km east of

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<sup>4</sup> Ratcliffe, D A (1977). *A Nature Conservation Review: The Selection of Biological Sites of National Importance to Nature Conservation in Britain*. Two Volumes. Cambridge University Press, Cambridge.



the Site. St James' Pit SSSI is designated solely for its geological rather than ecological interest.

5.2.3. Given the size of the development and the intervening habitats between the Site and nearby statutory designations, the development of the Site is not likely to have any direct, indirect or in-combination adverse effect upon designated sites, be it during construction or operational phase.

5.2.4. The Norfolk Green Infrastructure and Recreational Impact Avoidance and Mitigation Strategy (GIRAMS), published in March 2021, defines Zones of Influence for various Norfolk Habitats Sites (aka European Designated Sites) with regard to recreational impacts, as set out in the table below. This position was endorsed by Natural England in its letter of 12 August 2019 (included as Appendix 1 to the GIRAMS).

Area	European Designated Sites	Zoi (km)
Breckland sites	Breckland SPA Breckland SAC	26
Broads sites	The Broads SAC Broadland SPA	25
East Coast sites	Breydon Water SPA Winterton-Horsey Dunes SAC Great Yarmouth and North Denes SPA	30
North Coast sites	North Norfolk Coast SAC North Norfolk Coast SPA The Wash and North Norfolk Coast SAC	42
Roydon and Dersingham	Roydon Common and Dersingham Bog SAC Roydon Common Ramsar Dersingham Bog Ramsar	12
Norfolk Valley Fens	Norfolk Valley Fens SAC	15
The Wash	The Wash SPA The Wash Ramsar The Wash and North Norfolk Coast SAC	61

**Table 5.1.** Zone of Influence for Norfolk Habitats Sites for recreational impacts.

5.2.5. The Site is within the Zone of Influence for the following:

- Broads Sites;
- East Coast Sites;
- North Coast Sites; and
- Norfolk Valley Fens.

5.2.6. Natural England's advice in their August 2019 letter was that if new residential development were proposed within the Zone of Influence of these designations, Likely Significant Effect on integrity through recreation effects should be assumed. Proposals would in such circumstances need to demonstrate that adverse effects would be avoided, when considered alone and in combination with other plans or projects. Sites of 50 units or more should include provision of well-designed open space / green infrastructure, proportionate to its scale, as well as make a financial contribution per unit according to the tariff set out in the GIRAMS.

5.2.7. The Impact Risk Zone for River Wensum SSSI (which underpins River Wensum SAC) is defined on the MAGIC website as 4km, which covers the

Site. A Zone of Influence has not been defined in the same way as the other designations noted above. The River Wensum is subject to a long term strategy, published in 2018, aimed at enabling change and regeneration through improving public access.

- 5.2.8. On 16 March 2022, Natural England issued a letter setting out advice for development proposals with the potential to affect water quality resulting in adverse nutrient impacts on habitats sites i.e. SPAs, SACs and Ramsar sites. Natural England's advice to affected Local Planning Authorities in their role as competent authority under the Habitats Regulations, which includes Norwich City Council, is to:

**...carefully consider the nutrients impacts of any new plans and projects (including new development proposals) on habitats sites and whether those impacts may have an adverse effect on the integrity of a habitats site that requires mitigation, including through nutrient neutrality.**

- 5.2.9. Natural England notes that it has:

**Undertaken an internal evidence review to identify an initial list of water dependent habitats sites (which includes their underpinning Sites of Special Scientific Interest) that are in unfavourable condition due to elevated nutrient levels (phosphorus or nitrogen or both). These sites are listed in Annex C. Development which will add nutrients to these sites may not meet the site integrity test without mitigation. This will need to be explored as part of the HRA. Nutrient neutrality is an approach which could be used as suitable mitigation for water quality impacts for development within the catchments of these sites...**

- 5.2.10. The advice continues:

**A plan or project will be relevant and have the potential to affect the water quality of the designated site where:**

- **It creates a source of water pollution (e.g. discharge, surface run off, leaching to groundwater etc) of either a continuous or intermittent nature or has an impact on water quality (e.g. reduces dilution).**

**AND**

- **There is hydrological connectivity with the designated site i.e. it is within the relevant surface and / or groundwater catchment.**

**AND**

- **The designated sites interest features are sensitive to the water quality pollutant / impact from the plan / project.**

...

**Natural England advises you, as the Competent Authority under the Habitats Regulations, to fully consider the nutrients implications on the sites identified in Annex C Table 2 when determining relevant plans or projects and to secure appropriate mitigation measures.**

**When considering a plan or project that may give rise to additional nutrients within the affected catchments, you should undertake a HRA. An Appropriate Assessment will be needed where a likely significant effect (alone or in-combination) cannot be ruled out, even where the proposal contains mitigation provisions. The need for an Appropriate Assessment of proposals that includes mitigation measures intended to avoid or reduce the harmful effects of a plan or project is well established in case law<sup>5</sup>. The Competent Authority should only grant permission if they have made**

**certain at the time of Appropriate Assessment that the plan or project will not adversely affect the integrity of a habitats site i.e. where no reasonable scientific doubt remains as to the absence of effects.**

...

**Your authority may wish to consider a nutrient neutrality approach as a potential solution to enable developments to proceed in the catchment(s) where an adverse effect on site integrity cannot be ruled out. For such an approach to be appropriate, the measures used to mitigate nutrients impacts should not compromise the ability to restore the designated site to favourable condition and achieve the conservation objectives...**

- 5.2.11. Table 2 in Annex C is entitled *Additional habitats sites in unfavourable condition due to excessive nutrients which require a Habitats Regulations Assessment (HRA) and where nutrient neutrality is a potential solution to enable development to proceed.*
- 5.2.12. The table includes the following designated sites relevant to the Site where Norwich City Council is the competent authority under the Habitats Regulations:
- River Wensum SAC, with phosphorus named as an excessive nutrient;
  - The Broads SAC / Ramsar, limited to Bure Broads and Marshes SSSI, Trinity Broads SSSI, Yare Broads and Marshes SSSI, Ant Broads and Marshes SSSI and Upper Thurne Broads and Marshes SSSI, with nitrogen and phosphorus named as excessive nutrients.
- 5.2.13. The potential for effects on these designations is considered in the separate Shadow Habitats Regulations Assessment, with input from the project drainage consultant, EAS. In summary it is considered that any potential for adverse effects will be avoided, both alone and in combination with other plans and projects.
- 5.2.14. **Non-statutory Sites.** There are no non-statutory sites within or directly adjacent to the Site.
- 5.2.15. The closest such site is Train Wood County Wildlife Site (CWS), located approximately 0.3km west of the Site, adjacent to the River Wensum. This area comprises wet woodland and contains the locally rare Opposite Leaved Golden Saxifrage *Chrysosplenium oppositifolium* and nationally scarce Hoary Mullein *Verbascum pulverulentum*.
- 5.2.16. No significant effects are likely to occur to non-statutory sites given the nature of the development project and intervening land use between the Site and nearby non-statutory designations.

#### *Habitats*

- 5.2.17. The habitats within the Site are largely of negligible ecological interest. Their removal to facilitate the proposed development is of negligible significance. The exception to this are the trees, particularly those on the St Crispins Road frontage. They are of significant ecological interest in the context of the Site and the immediate locality, given the lack of similar

features in this area. It is understood that some of these will need to be removed to facilitate a new access point from St Crispins Road.

5.2.18. An extensive range of new habitats and planting is included with the landscape and drainage strategies. This includes:

- Groundcover shrubs (including planting with infiltration kerbs) ;
- Grassland in new garden areas;
- Mixed native hedging;
- Trees;
- Biodiverse roofs;
- Podium roof terraces; and
- Swales.

5.2.19. These new habitats will offer opportunities for wildlife within the development, including birds and invertebrates and potentially bats and small terrestrial mammals. The Site is currently largely devoid of vegetation, with the trees on the southern boundary being the only significant area. Opportunities for wildlife are therefore very limited currently, and these gains are a significant benefit of the scheme. As well as providing new habitats within the Site, the design of the scheme is such that connectivity for wildlife through the built form will be encouraged.

#### *Biodiversity Net Gain*

5.2.20. As noted above, the Site is currently of negligible overall interest, principally comprising buildings and hardstanding with very limited vegetation. The planting and habitats to be delivered as part of the proposed development will deliver a measurable Biodiversity Net Gain. This is considered in a separate report.

#### *Invasive Species*

5.2.21. Buddleia was identified within the Site. While not listed on the Wildlife & Countryside Act, Buddleia is a non-native species. Although its control is not a legal requirement, reasonable measures should be taken to prevent the spread of this plant species. Where vegetation is to be removed, the material should be disposed of at an approved facility.

### 5.3. Faunal Evaluation

#### *Bats*

5.3.1. **Legislation.** All bats are protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) and included on Schedule 2 of the Conservation of Habitats and Species Regulations 2017 (“the Habitats Regulations”). These include provisions making it an offence:

- Deliberately to kill, injure or take (capture) bats;
- Deliberately to disturb bats in such a way as to significantly affect:-
  - (i) be likely to impair their ability to survive, to breed or rear or nurture their young; or to hibernate or migrate; or
  - (ii) to affect significantly the local distribution or abundance of the species to which they belong;

- To damage or destroy any breeding or resting place used by bats;
  - Intentionally or recklessly to obstruct access to any place used by bats for shelter or protection (even if bats are not in residence).
- 5.3.2. The words deliberately and intentionally include actions where a court can infer that the defendant knew that the action taken would almost inevitably result in an offence, even if that was not the primary purpose of the act.
- 5.3.3. The offence of damaging (making it worse for the bat) or destroying a breeding site or resting place is an absolute offence. Such actions do not have to be deliberate for an offence to be committed.
- 5.3.4. In accordance with the Habitats Regulations the licensing authority (Natural England) must apply the three derogation tests as part of the process of considering a licence application. These tests are that:
1. The activity to be licensed must be for imperative reasons of overriding public interest or for public health and safety;
  2. There must be no satisfactory alternative; and
  3. The favourable conservation status of the species concerned must be maintained.
- 5.3.5. Licences can usually only be granted if the development is in receipt of full planning permission.
- 5.3.6. **Site Usage.** No evidence of roosting bats was recorded during the internal and external surveys of the buildings on site in July 2018. The trees are also devoid of features suitable for roosting bats. A low level of bat activity was recorded during the activity survey and by the static SM4BAT detectors.
- 5.3.7. Given the low levels of activity and the negative results of the internal and external inspection work, the Site is considered to be of negligible interest to local bat populations.
- 5.3.8. **Mitigation and Enhancements.** The buildings on site exhibit no evidence of roosting bats and their removal is not considered to be detrimental to any local bat population. Given the results of the activity survey and the negative results of the building inspections, there is no evidence that a roost is present, and work may proceed without a Natural England licence.
- 5.3.9. As an enhancement, it is recommended that bat boxes of varying designs be incorporated into the development. This would increase available roosting opportunities.
- 5.3.10. Any external lighting on the proposed structures should also be minimal and designed to limit light spillage, to avoid disturbance to local bat populations. There should be no direct lighting on or near to any installed bat box.
- 5.3.11. The landscape strategy will provide significantly increased opportunities for foraging bats through encouragement of invertebrates, relative to the existing situation.

### *Hedgehogs*

- 5.3.12. **Legislation.** Hedgehog is a species of principal importance for the conservation of biodiversity under Section 41 (England) of the NERC Act 2006.
- 5.3.13. The NERC Act 2006 requires the Secretary of State to:
- ... take such steps as appear... to be reasonably practicable to further the conservation of the living organisms and types of habitat included in any list published under this section, or... promote the taking by others of such steps.**
- 5.3.14. **Site Usage.** No evidence of Hedgehogs was recorded on site, and opportunities are currently negligible.
- 5.3.15. **Mitigation and Enhancements.** All boundary treatments will be suitably permeable to facilitate Hedgehog Gateways. This will encourage dispersal within the Site should the species colonise.

### *Birds*

- 5.3.16. **Legislation.** Section 1 of the Wildlife and Countryside Act 1981 (as amended) is concerned with the protection of wild birds, while Schedule 1 lists species that are protected by special penalties. All species of birds receive general protection while nesting.
- 5.3.17. **Site Usage.** The habitats on-site offer limited foraging opportunities for birds with these opportunities concentrated on the amenity grassland area and among the mature trees. The trees within the Site do offer suitable nesting opportunities for local bird species. Among the six bird species identified on site, Feral Pigeon were also found to be nesting in the buildings within the Site during this time.
- 5.3.18. **Mitigation and Enhancements.** The proposals will involve the demolition of all buildings. It is recommended that a nesting bird survey of each building is undertaken prior to its demolition to ensure no nesting birds are present. Feral Pigeon were recorded within buildings on site and this species will often nest year-round; therefore, the demolition of the buildings may need to be undertaken using the Natural England General Licence (GL41). This licence allows the killing of specific bird species, and allows the damage, removal or destruction of their nests and eggs. It is noted that this licence can only be used to preserve public health and public safety with the terms and conditions of the licence be always adhered to.
- 5.3.19. Removal of any suitable nesting habitat should be undertaken outside of the bird nesting season (March to July inclusive) to avoid any potential offence. Should these timing constraints conflict with any timetabled works, works should commence only after a suitably qualified ecologist has undertaken checks to ensure no nesting birds are present, and any confirmed nests left in situ until the young have fledged.
- 5.3.20. The development would present opportunities to enhance the Site for birds through native species planting and installation of additional bird boxes.

The planting of berry / fruit-bearing species would provide enhanced foraging opportunities. New tree planting and mixed native hedging has been incorporated into the landscape strategy and will provide further nesting and foraging opportunities to birds. It is recommended that new tree planting comprise native species or species of known value to birds.

*Invertebrates*

- 5.3.21. **Legislation.** Section 1 of the Wildlife and Countryside Act 1981 (as amended) is concerned with the protection of wild birds, while Schedule 1 lists species that are protected by special penalties. All species of birds receive general protection while nesting.
- 5.3.22. **Site Usage.** The habitats on site provide limited opportunities for invertebrates.
- 5.3.23. **Mitigation and Enhancements.** The landscape strategy will offer a variety of new opportunities for invertebrates, presenting a significant enhancement on the existing situation.

## 6. PLANNING POLICY CONTEXT

- 6.1. The planning policy framework that relates to nature conservation at the Site is issued at two main administrative levels: nationally through the National Planning Policy Framework (NPPF) and at the local level through the policies of Norwich City Council.
- 6.2. Any proposed development will be judged in relation to the policies contained within the following documents.

### 6.3. National Policy

#### *National Planning Policy Framework (July 2021)*

- 6.3.1. Guidance on national policy for biodiversity is provided by the NPPF, published on 20 July 2021. The document replaces the NPPF published in February 2019. It is noted that the NPPF continues to refer to further guidance in respect of statutory obligations for biodiversity and geological conservation and their impact within the planning system provided by Circular 06/05 (DEFRA / ODPM, 2005) accompanying the now-defunct Planning Policy Statement 9 (PPS9).
- 6.3.2. The key element of the NPPF is that there should be “*a presumption in favour of sustainable development*” (paragraph 11). It is important to note that this presumption “*does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site*” (paragraph 182). ‘Habitats site’ has the same meaning as the term ‘European site’ as used in the Habitats Regulations 2017.
- 6.3.3. Hence the direction of Government policy is clear; that is, the presumption in favour of sustainable development is to apply in circumstances where there is potential for an effect on a European site, if it has been shown that there will be no adverse effect on that designated site as a result of the development in prospect.
- 6.3.4. A number of policies in the NPPF are comparable to those in PPS9, including reference to minimisation of impacts to biodiversity and provision of net gains to biodiversity where possible (paragraph 174).
- 6.3.5. The NPPF also considers the strategic approach that Local Authorities should adopt with regard to the protection, maintenance and enhancement of green infrastructure, priority habitats and ecological networks, and the recovery of priority species.
- 6.3.6. Paragraphs 180 and 181 of the NPPF comprise a number of principles that Local Authorities should apply, including integrating opportunities to incorporate biodiversity in and around developments; provision for refusal of planning applications if significant harm cannot be avoided, mitigated or compensated for; applying the protection given to European sites to potential SPAs, possible SACs, listed or proposed Ramsar sites and sites identified (or required) as compensatory measures for adverse effects on European sites; and the provision for the refusal for developments resulting in the loss or deterioration of ‘irreplaceable’ habitats – unless there are



'wholly exceptional reasons' (for instance, infrastructure projects where the public benefit would clearly outweigh the loss or deterioration of habitat) and a suitable compensation strategy exists.

- 6.3.7. National policy therefore implicitly recognises the importance of biodiversity and that with sensitive planning and design, development and conservation of the natural heritage can co-exist and benefits can, in certain circumstances, be obtained.

#### 6.4. Local Policy

- 6.4.1. The emerging development plan, the Greater Norwich Local Plan (GNLP), being prepared by Broadland DC, South Norfolk Council, NCC and Norfolk County Council (the Partnership), will supersede the Joint Core Strategy for Broadland, Norwich and South Norfolk (2014) (JCS) and Norwich Site Allocations and Site Specific Policies Local Plan (2014) (NSASSP) once adopted. The GNLP Reg 19 version was submitted to the Secretary of State for examination on 30th July 2021.
- 6.4.2. The examination process is underway, for which hearing sessions took place during February and March 2022. As a result of the hearings, many policies, including the emerging allocation for the Site were subject to debate, addressing their soundness and the consequential need for amendment, alongside requests for additional information by the Inspectors. It is therefore considered likely the Council will prepare and consult upon Modifications or at least minor changes to both policy text and supporting text, relevant to this application. This process, and the publication of the Inspectors' report may extend beyond the determination of this application, and so final GNLP policy wording may not be available at that stage.
- 6.4.3. Paragraph 48 of the National Planning Policy Framework 2021 (NPPF) requires decision makers to give weight to relevant policies of emerging Local Plans according to the stage of preparation, the extent of unresolved objections, and the degree of consistency between emerging policies and the NPPF. In this instance, there are currently unresolved objections, in respect of some of which the Inspectors have requested additional information, and accordingly there are likely to be Modifications to some policies relevant to this application before they can be considered sound. On this basis, it is considered that in respect of those policies, the emerging development plan currently holds limited weight in decision making. In this context, those policies are not considered in detail.

##### *Norwich Local Plan (adopted November 2014)*

- 6.4.4. The Norwich Local Plan will guide development in the area until it is superseded by the Greater Norwich Local Plan.
- 6.4.5. The Norwich Local Plan comprises three main documents, the Joint Core Strategy (JCS), the Site Allocations and Site Specific Policies Local Plan and Development Management Policies Local Plan.

*Joint Core Strategy for Broadland, Norwich and South Norfolk (adopted March 2011)*

- 6.4.6. **Policy 1: Addressing climate change and protecting environmental assets** – This policy is concerned with the promotion of sustainability and states that developments will be designed to mitigate and adapt to climate change. The policy also concerns the protection, restoration, and enhancement of the environment and encourages developments to connect existing areas of biodiversity importance, to create green networks. Developments will also need to ensure that they will have no detrimental effect on European and Ramsar designated sites and European protected species. Any development likely to adversely affect protected sites and species will be assessed in accordance with national policy and legislation. In areas that are not granted national or international designations, developments will minimise habitat fragmentation, mitigate unavoidable loss of biodiversity, facilitate the connection of wildlife resources, and maintain this green infrastructure in the long-term.
- 6.4.7. **Policy 2: Promoting good design** – This policy is largely concerned with the design of developments, to ensure the highest possible standards. Included within this policy is the need for developments to avoid adverse impacts to areas of environmental value including SACs, SPAs and Ramsar sites.
- 6.4.8. **Policy 3: Energy and water** – This policy is concerned with the use of renewable energy sources and the requirement of appropriate water infrastructure for developments. Developments must ensure that they do not adversely affect environmentally important water bodies in the surrounding area.

*Norwich Development Management Policies Local Plan  
(adopted December 2014)*

- 6.4.9. **Policy DM1** – This policy mentions the protection and enhancement of the environmental assets of Norwich.
- 6.4.10. **Policy DM3** – This policy is largely concerned with the design of new developments and includes a specific reference to green infrastructure, landscaping and biodiversity. Developments will be expected to protect existing and create new green infrastructure as a key part of their design. Developments are encouraged to incorporate new and enhanced green infrastructure which assist in the protection and enhancement of wildlife habitats and which utilise native plant species. In addition, newly created habitats should be integrated into the wider ecological network.
- 6.4.11. **Policy DM6** – This policy is concerned with the protection and enhancement of local biodiversity. Developments are encouraged to create and integrate green infrastructure and wildlife friendly features into their design. Developments likely to negatively impact priority habitats and species will not be supported unless harm can be compensated for via biodiversity offsetting. The policy also states that when developments have an adverse impact on nationally designated sites, they will only be approved if the benefits of the development outweigh the impacts to the designated site. A similar approach is taken for regional and local sites of importance. Developments will only be approved if there is no significant

and discernible adverse impact to the area in question. When a development is likely to cause detrimental damage to an area of importance, methods of mitigation must be provided.

- 6.4.12. **Policy DM7** – This policy is concerned with the retention and removal of trees and hedgerows as part of a development. Existing vegetation should be incorporated as part of the development design and retained features protected throughout the course of the development via the use of suitable mitigation measures. The policy states that the removal of trees and hedgerows will not be permitted unless the removal of these features will enhance the survival of other protected trees or hedgerows, or when their removal will improve the design of the development such that the benefits of the development outweigh the loss of any tree or hedgerow. Replacement planting will also be required in the event of tree removal. The policy also states that developments comprising a frontage onto a highway will only be permitted when they provide for the planting and maintenance of street trees.
- 6.4.13. **Policy DM8** – This policy is concerned with the protection and provision of existing open space. Developments resulting in the loss of open space will not be allowed unless the biodiversity value of the space is free from significant adverse impacts. The creation and enhancement of green spaces will also be encouraged when they are of benefit to biodiversity.
- 6.4.14. **Policy DM11** – This policy is concerned with environmental hazards. When developments are situated within a designated groundwater source protection zone or affecting an important aquifer, mitigation measures must be incorporated into the development's design to reduce the likelihood of pollution. Mitigative measures must also be taken when the development is adjacent to a watercourse.

*Landscape and Trees Supplementary Planning Document  
(adopted June 2016)*

- 6.4.15. This document contains information relating to trees and aims to promote awareness of the importance of these features in developments, and to encourage the early consideration of trees as part of the design process, to provide environments of higher quality post-development.

## 6.5. Discussion

- 6.5.1. The development proposals would be judged against the policies summarised above. It is considered that the Site is of intrinsically low ecological interest. Mitigation and enhancement measures have been proposed and overall there is expected to be significant ecological benefit, through provision of new areas of planting and habitat, offering new opportunities and connectivity for wildlife currently absent from the Site. Further specific measures are the inclusion of bat and bird boxes. Taking these recommendations on board it is considered that the relevant policy requirements will be met.

## 7. SUMMARY AND CONCLUSIONS

- 7.1. Ecology Solutions was commissioned in September 2021 by Weston Homes to review and update the ecological assessment of the Site at Anglia Square, Norwich.
- 7.2. The site consists of a series of buildings with mixed use and design, to the north of the centre of Norwich. All structures are to be demolished and redeveloped for an urban regeneration mixed use scheme, with the exception of two buildings encompassed by but not within the Site. A small area of amenity grassland, several trees and extensive hardstanding are also present within the Site.
- 7.3. **Statutory Sites.** There are no statutory designations of nature conservation value within or immediately adjacent to the Site. The closest such sites are St James' Pit SSSI (designated for geological reasons) and Mousehold Heath Local Nature Reserve (LNR), located approximately 0.9km east of the Site. Owing to the distance and intervening habitat between the Site and this statutory designation, as well as the nature of the development, it is considered unlikely that the development of the Site will have any direct, indirect or in-combination adverse effect upon this designated site, be it during the construction or operational phase.
- 7.4. A series of European designations are in the wider area; these are considered further in the accompanying Shadow Habitats Regulations Assessment, but in summary it is considered that potential adverse effects arising from the proposed development will be avoided, both alone and in combination with other plans or projects.
- 7.5. **Non-statutory Sites.** There are no non-statutory sites within or immediately adjacent to the Site. The closest non-statutory site is Train Wood County Wildlife Site (CWS), located approximately 0.3km west of the Site, adjacent to the River Wensum. It is not considered that any significant effect will occur to non-statutory sites given the nature of the development project and intervening land use between the Site and nearby non-statutory designations.
- 7.6. **Habitats.** The habitats within the Site are in themselves of low intrinsic ecological interest. Their removal to facilitate the proposed development is of negligible significance. The exception to this are the trees, particularly those on the St Crispins Road frontage. They are of significant ecological interest in the context of the Site and the immediate locality, given the lack of similar features in this area. It is understood that some of these will need to be removed to facilitate a new access point from St Crispins Road.
- 7.7. An extensive range of new habitats and planting is included with the landscape and drainage strategies. This includes groundcover shrubs, grassland, mixed native hedging, trees, biodiverse roofs, podium roof terraces and swales. These new habitats will offer opportunities for wildlife within the development, including birds and invertebrates and potentially bats and small terrestrial mammals. The Site is currently largely devoid of vegetation, with the trees on the southern boundary being the only significant area. Opportunities for wildlife are therefore very limited currently, and these gains are a significant benefit of the scheme. As well as providing new habitats within the Site, the design of the scheme is such that connectivity for wildlife through the built form will be encouraged.

- 7.8. **Biodiversity Net Gain.** The site is currently of negligible overall interest, principally comprising buildings and hardstanding with very limited vegetation. The planting and habitats to be delivered as part of the proposed development will deliver a measurable Biodiversity Net Gain. This is considered in a separate report.
- 7.9. **Invasive Species.** No invasive species were observed on site, but Buddleia was identified within the Site. While not listed on the Wildlife & Countryside Act, Buddleia is a non-native species. Although its control is not a legal requirement, reasonable measures should be taken to prevent the spread of this plant species. Where vegetation is to be removed, the material should be disposed of at an approved facility.
- 7.10. **Bats.** The buildings on site exhibit no evidence of roosting bats and their removal will have no effect on bats. Given the results of the activity survey and the negative results of the building inspections, there is no evidence that a roost is present, and work may proceed without a Natural England licence.
- 7.11. As an enhancement, it is recommended that bat boxes of varying designs be incorporated into the development. This would increase available roosting opportunities. Any external lighting on the proposed structures should also be minimal and designed to limit light spillage, to avoid disturbance to local bat populations. There should be no direct lighting on or near to any installed bat box. The landscape strategy will provide significantly increased opportunities for foraging bats through encouragement of invertebrates, relative to the existing situation.
- 7.12. **Badgers.** No evidence of Badgers was recorded on site or immediately adjacent to the Site. The Site and surrounding area are wholly unsuitable for the species.
- 7.13. **Hedgehogs.** No evidence of Hedgehogs was recorded on site, and opportunities are currently negligible. Where fences are to be provided for new private gardens and public open spaces, they should be provided with Hedgehog Gateways to encourage colonisation and dispersal.
- 7.14. **Birds.** The habitats on-site offer limited foraging opportunities for birds with these opportunities concentrated on the amenity grassland area and among the mature trees. The trees within the Site do offer suitable nesting opportunities for local bird species. Among the six bird species identified on site, Feral Pigeon were also found to be nesting in the buildings within the Site during this time.
- 7.15. The proposals will involve the demolition of all buildings. It is recommended that a nesting bird survey of each building is undertaken prior to its demolition to ensure no nesting birds are present. Feral Pigeon were recorded within buildings on site and this species will often nest year-round; therefore, the demolition of the buildings may need to be undertaken using the Natural England General Licence (GL41). This licence allows the killing of specific bird species, and allows the damage, removal or destruction of their nests and eggs. It is noted that this licence can only be used to preserve public health and public safety with the terms and conditions of the licence be always adhered to.
- 7.16. Removal of any suitable nesting habitat should be undertaken outside of the bird nesting season (March to July inclusive) to avoid any potential offence. Should these timing constraints conflict with any timetabled works, works should commence only after a suitably qualified ecologist has undertaken checks to

ensure no nesting birds are present, and any confirmed nests left in situ until the young have fledged.

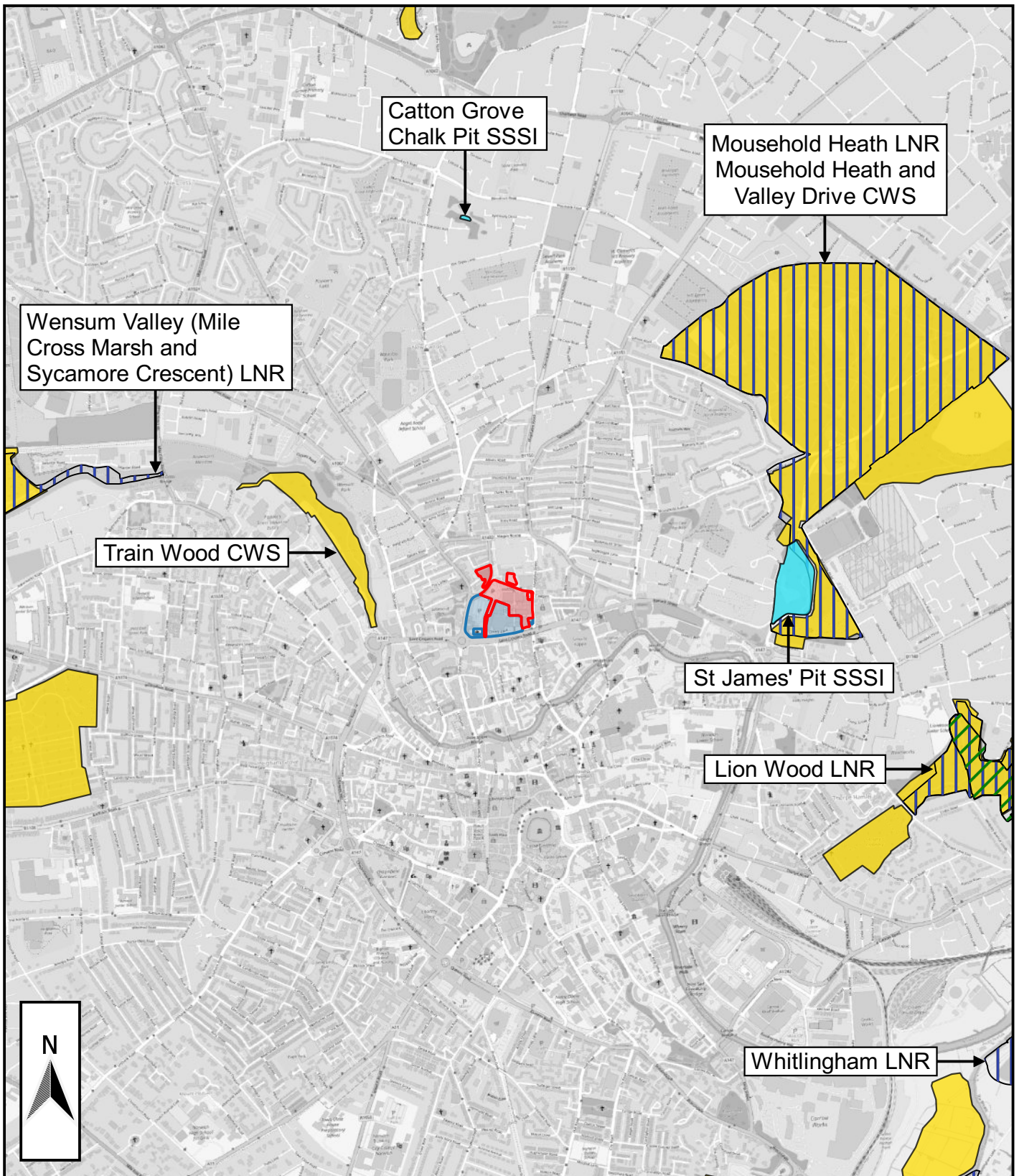
- 7.17. The development would present opportunities to enhance the Site for birds through native species planting and installation of additional bird boxes. The planting of berry / fruit-bearing species would provide enhanced foraging opportunities. New tree planting and mixed native hedging has been incorporated into the landscape strategy and will provide further nesting and foraging opportunities to birds. It is recommended that new tree planting comprise native species or species of known value to birds.
- 7.18. **Reptiles.** No reptiles were observed on site or immediately adjacent to the Site. The habitats present are wholly unsuitable for reptile species.
- 7.19. **Amphibians (Great Crested Newts).** There is no suitable aquatic breeding habitat within the Site. The habitats on site are unsuitable for amphibians in their terrestrial phase and their presence on site is considered to be highly unlikely.
- 7.20. **Invertebrates.** The landscape strategy will offer a variety of new opportunities for invertebrates, presenting a significant enhancement on the existing situation.
- 7.21. In conclusion, it is considered that there is no overriding ecological constraint to the redevelopment of the Site. The proposed development will provide significant new opportunities for wildlife through a range of new habitats and planting, along with further specific enhancements, and will deliver a measurable net gain for biodiversity. The proposals would accord with all relevant legislation and planning policy.

## PLANS

## **PLAN ECO1**

Site Location and Ecological Designations





**KEY:**

- DETAILED APPLICATION BOUNDARY
- OUTLINE APPLICATION BOUNDARY
- SITE OF SPECIAL SCIENTIFIC INTEREST (SSSI)
- LOCAL NATURE RESERVE (LNR)
- COUNTY WILDLIFE SITE (CWS)
- ANCIENT WOODLAND



**ECOLOGY SOLUTIONS**  
Part of the ES Group

Cokenach Estate  
Barkway | Royston  
Hertfordshire | SG8 8DL

+44(0)1763 848084  
east@ecology-solutions.co.uk  
ecology-solutions.co.uk

7948: ANGLIA SQUARE, NORWICH








PLAN ECO1: SITE LOCATION AND  
ECOLOGICAL DESIGNATIONS

Rev: C  
Mar 2022

## **PLAN ECO2**

Ecological Features



- KEY:**
-  DETAILED APPLICATION BOUNDARY
  -  OUTLINE APPLICATION BOUNDARY
  -  BUILDING
  -  HARDSTANDING
  -  AMENITY GRASSLAND
  -  IVY
  -  TREE




Cokenach Estate  
Barkway | Royston  
Hertfordshire | SG8 8DL

+44(0)1763 848084  
east@ecology-solutions.co.uk  
ecology-solutions.co.uk

**ECOLOGY SOLUTIONS**  
Part of the ES Group

**7948: ANGLIA SQUARE,  
NORWICH**

**PLAN ECO2:  
ECOLOGICAL FEATURES**

Rev: C  
Mar 2022

## **PHOTOGRAPHS**

PHOTOGRAPH 1: Building B1



PHOTOGRAPH 2: Building B1a



PHOTOGRAPH 3: Building B2



PHOTOGRAPH 4: Building B3



PHOTOGRAPH 5: Building B4 in background



PHOTOGRAPH 6: Building B5



PHOTOGRAPH 7: Building B7



PHOTOGRAPH 8: Building B8





PHOTOGRAPH 9: Loft space of Building B8



PHOTOGRAPH 10: Building B9



PHOTOGRAPH 11: Cobwebs around door frame Building B9



PHOTOGRAPH 12: Building B11 and Building B12



PHOTOGRAPH 13: Ivy covered wall



PHOTOGRAPH 14: Building B13



## **APPENDICES**

## **APPENDIX 1**

Information downloaded from Multi-Agency  
Geographic Information for the Countryside (MAGIC)



**Legend**

- Local Nature Reserves (England)
- National Nature Reserves (England)
- Ramsar Sites (England)
- Sites of Special Scientific Interest (England)
- SSSI Impact Risk Zones - to assess planning applications for likely impacts on SSSIs/SACs/SPAs & Ramsar sites (England)
- Special Areas of Conservation (England)
- Special Protection Areas (England)
- Ancient Woodland (England)**
- Ancient and Semi-Natural Woodland
- Ancient Replanted Woodland

Projection = OSGB36  
 xmin = 614500  
 ymin = 306000  
 xmax = 630800  
 ymax = 314000

Map produced by MAGIC on 8 March, 2022.  
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# **ECOLOGY**SOLUTIONS

Part of the ES Group

Ecology Solutions Limited | Cokenach Estate | Barkway | Royston | Hertfordshire | SG8 8DL

01763 848084 | [east@ecologysolutions.co.uk](mailto:east@ecologysolutions.co.uk) | [www.ecologysolutions.co.uk](http://www.ecologysolutions.co.uk)