

APPENDIX 9.6
OTTER AND WATER VOLE SURVEY REPORT

APPENDIX 9.6
(OTTER AND WATER VOLE SURVEYS)
TO
CHAPTER 9 OF THE ENVIRONMENTAL STATEMENT

ALLESTON SOLAR FARM, PEMBROKESHIRE

carried out by



commissioned by

ALLESTON CLEAN ENERGY LTD.

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OTTER AND WATER VOLE SURVEY REPORT

ALLESTON SOLAR FARM, PEMBROKESHIRE

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The information, data and advice which has been prepared and provided is true, and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's (CIEEM) Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions. This report and its contents remain the property of Clarkson and Woods Ltd. until payment has been made in full.



1 INTRODUCTION

- 1.1.1 Clarkson and Woods Ltd. was commissioned by the Applicant Alleston Clean Energy Ltd. to carry out otter and water vole surveys at the land at Alleston Farm, Lower Lamphey Road, Lamphey, Pembrokeshire, hereafter referred to as 'the Site'.
- 1.1.2 The Development comprises the installation of an approximately a 30MW ground mounted photovoltaic solar farm together with associated equipment, infrastructure and ancillary works.
- 1.1.3 Physical investigations of ditches and watercourses at the Site to look for evidence of otter and water vole, and to appraise their suitability to support them, were carried out in April and June 2024.
- 1.1.4 Unless the client indicates to the contrary, information on the presence of species collected during the surveys will be passed to the county biological records centre in order to augment their records for the area. This is in line with the CIEEM code of professional conduct¹.

1.2 Survey Aims and Assessment Scope

- 1.2.1 Surveys for otters and water voles were undertaken to establish species presence or likely absence to ensure that the works pertaining to the Development are carried out in line with relevant legislation, and to inform an appropriate approach to mitigation during the construction and operational phases of the Development.
- 1.2.2 Natural Resources Wales advised the Applicant to consider otters up to 200m from the boundary of the Site due to the proximity of the ponds within Alleston Wood and watercourses further off site. In addition, otters are listed as an Annex II species that is present as a qualifying feature, but not a primary reason for selection, of the Pembrokeshire Bat Sites and Bosherton Lakes Special Area of Conservation (SAC). This survey scope was intended to determine how otter use the local landscape through the year and demonstrate that the development is unlikely to have a negative impact on this SAC feature and European Protected Species.
- 1.2.3 This report details the methods and results of the surveys and provides an overview of the potential impacts on otter and water vole that could result from the Development.
- 1.2.4 This information will also be used within the Environmental Statement to:
- Inform the ecological evaluation of the habitats used by water voles and otters;
 - to characterise the impacts on them considered likely to result from the Development;
 - to establish any avoidance and mitigation measures required to minimise impacts; and
 - to determine any residual effects on water voles and otters post-mitigation which are considered likely to occur.

1.3 Site Description Summary

- 1.3.1 The Site is located at Alleston Farm, Pembrokeshire, adjacent to the south-east of Pembroke and approximately 300m to the west of the village of Lamphey. Land use in the surrounding area of the Site is predominantly agricultural, with scattered farmhouses as well as residential development associated with Pembroke town and Lamphey village.
- 1.3.2 The Site is bound to the north by Lower Lamphey Road and agricultural fields, to the east by agricultural fields, and to the west by a belt of trees, a stream and Watery Lane. In addition, there are a small number of residential properties located adjacent to the north and west of the Site boundary.
- 1.3.3 The Site is accessible to vehicles from the north via Lower Lamphey Road and from the west via Watery Road.
- 1.3.4 The Site occupies an area of approximately 96 hectares (ha), which is predominantly comprised of large, open arable fields characterised by spring-sown cereal crops, non-cereal crops with narrow field margins, and livery, bounded by a network of managed hedgerows and a stream. Sections of the stream appear to have been straightened to form drainage between the field network on site.
- 1.3.5 A stand of unmanaged woodland (Alleston Wood) is present within the Site boundary, within which a pond (Pond 1) is located. This is fed by the stream that runs south to north through the Site itself. This woodland,

¹ Code of Professional Conduct. CIEEM, January 2019.



pond and section of stream therein were included within the survey scope due to the proximity to the redline boundary. A further pond (Pond 2) was located approximately 65m west from the southwest corner of the Site.

- 1.3.6 The Site is bound by flowing water in the form of small streams, including straightened sections, feeding into Pembroke River and Mill Pond in Pembroke.

1.4 Quality Assurance

- 1.4.1 All ecologists employed by Clarkson and Woods are members of the Chartered Institute of Ecology and Environmental Management (CIEEM) and follow the Institute's Code of Professional Conduct² when undertaking ecological work.
- 1.4.2 The competence of all field surveyors has been assessed by Clarkson and Woods with respect to the CIEEM Competencies for Species Survey (CSS)³.
- 1.4.3 This report has been prepared in accordance with the relevant British Standard: BS42020: 2013 – Biodiversity: Code of Practice for Planning and Development⁴. It has been prepared by an experienced ecologist who is a member of CIEEM.

² CIEEM (2013). *Code of Professional Conduct*. www.cieem.net/professional-conduct.

³ CIEEM (2013). *Competencies for Species Survey (CSS)*. www.cieem.net/competencies-for-species-survey-css.

⁴ The British Standards Institution (2013). *BS42020: 2013 – Biodiversity: Code of Practice for Planning and Development*. BSI Standards Ltd.



2 METHODOLOGY

2.1 Desk Study

- 2.1.1 Aderyn, the biodiversity information and reporting database for Wales, was consulted for records of otters and water voles within 2km of the Site.
- 2.1.2 Clarkson and Woods' own database of ecological records derived from past survey work was also consulted for further locally-relevant data.
- 2.1.3 The data presented within this report constitutes a summary of the data obtained from the local records centre. Should additional detail be required on any of the records described within this report Clarkson and Woods Ltd. should be contacted.

2.2 Field Surveys

- 2.2.1 Surveys comprised the evaluation of habitat suitability of all ditches and watercourses on and adjacent to the Site, as well as further, detailed 'spot checks' for field signs of the presence of riparian mammals within the channels of those ditches determined to provide a reasonable level of likelihood of presence. **Figure 1** refers.
- 2.2.2 All ditches and water courses present within the Site were assessed for their suitability on 14 February 2024 with more in-depth inspections undertaken in spring, on 04 April 2024. Where accessible, offsite sections of watercourses to 200m upstream and downstream were subject to a further suitability assessment on 11 June 2024, where access was available.
- 2.2.3 In order to ensure a reasonable effort of survey across the Site, surveyors completed spot checks every 10-20m to search for otter and water vole field signs within watercourses. These spot checks involved entering the watercourse to carry out an intensive search of bankside and water-edge habitat for field signs over approximately a 10m length. In this way, an aggregate total of between 3-4km of watercourse was intensively inspected, distributed across the Sites. In addition, particular locations containing features seen to be of potential value to otters for holt-creation or sprainting were searched, such as at the bases of mature trees or at bridges or exposed bankside features.
- 2.2.4 Surveys followed good practice guidelines contained within Natural England Guidance⁵ (in the case of otters, and in the absence of specific guidelines for Wales) and Dean et al. 2016 in accordance with criteria developed by Strachan et al (2011)⁶ (in the case of water voles). However, due to the very limited suitability of the Site for water vole, a second assessment for the species was not undertaken.
- 2.2.5 Experienced surveyors assessed watercourses and areas of wetland on Site for their suitability for otter and water vole. This included an assessment of water depth, flow-rate, prey availability, water quality, vegetation cover and sheltering opportunities.
- 2.2.6 Feeding remains and droppings (latrines) are the most conclusive field sign for detecting water vole presence. However, supplemental evidence, such as burrows and prints can help corroborate this, although they are less easy to attribute directly to water vole owing to their similarity to other species such as rat. Field signs of typical water vole predators, such as mink and domestic cats, were also recorded. All such field signs were mapped and described when they were recorded.
- 2.2.7 Otter field signs searched for included spraints (droppings), footprints, slides, paths, feeding evidence, holts (underground resting places) or couches (temporary resting places). Mud and sand exposures were searched for spraints and footprints.
- 2.2.8 Each habitat suitability assessment considered the following factors:
 - Water quality

⁵ Natural England (updated 15/10/14). *Otters: surveys and mitigation for development projects*.

⁶ Strachan R., Moorhouse T.P. & Gelling M. (2011) *Water Vole Conservation Handbook* 3rd Edition. Wildlife Conservation Research Unit, Oxford.



- Water-level regime
- Channel dimensions
- Bank type and material
- Vegetation for cover and food sources (water voles)
- Shading and presence of trees/scrub
- Predation (water vole) and competition
- Habitat management

2.2.9 The above criteria were then used to classify the suitability of watercourses separately for water vole and otter as follows:

- Optimal – excellent habitat with good cover, food sources and other elements that would allow a typical water vole population to thrive throughout the year, or form part of an otter core home range/territory.
- Good - habitat with all the essential elements necessary for sustaining a residual water vole or otter population.
- Suitable but poor - habitat with most of the essential features, but with some factors likely to prevent suitability throughout the year.
- Negligible - habitat lacking one or more crucial elements for use by water voles or otters. This category does not necessarily preclude the habitat being used for dispersal or occasional occupation/foraging, especially where connected to other suitable habitat, but habitat highly unlikely to sustain a residual population of this species.

2.3 Limitations

- 2.3.1 When surveying watercourses up to 200m outside of the red line boundary, access to three of six identified sections for survey was not possible due to permission being denied by the landowners (offsite sections 1-3). Other sections of the watercourses were found to be very densely vegetated with scrub habitat in places, which was impenetrable. These areas have been identified within the text and a best effort was made while on Site to assess these sections from accessible points nearby.
- 2.3.2 Otters have no defined breeding season and the breeding holt is kept deliberately obscure by the female, so locating one can be difficult and time consuming.
- 2.3.3 Where water voles live at low densities or a Site is at the edge of their range, field signs can be difficult to locate. Furthermore, water vole populations may expand over time and consequently may migrate onto Site after surveys are completed.

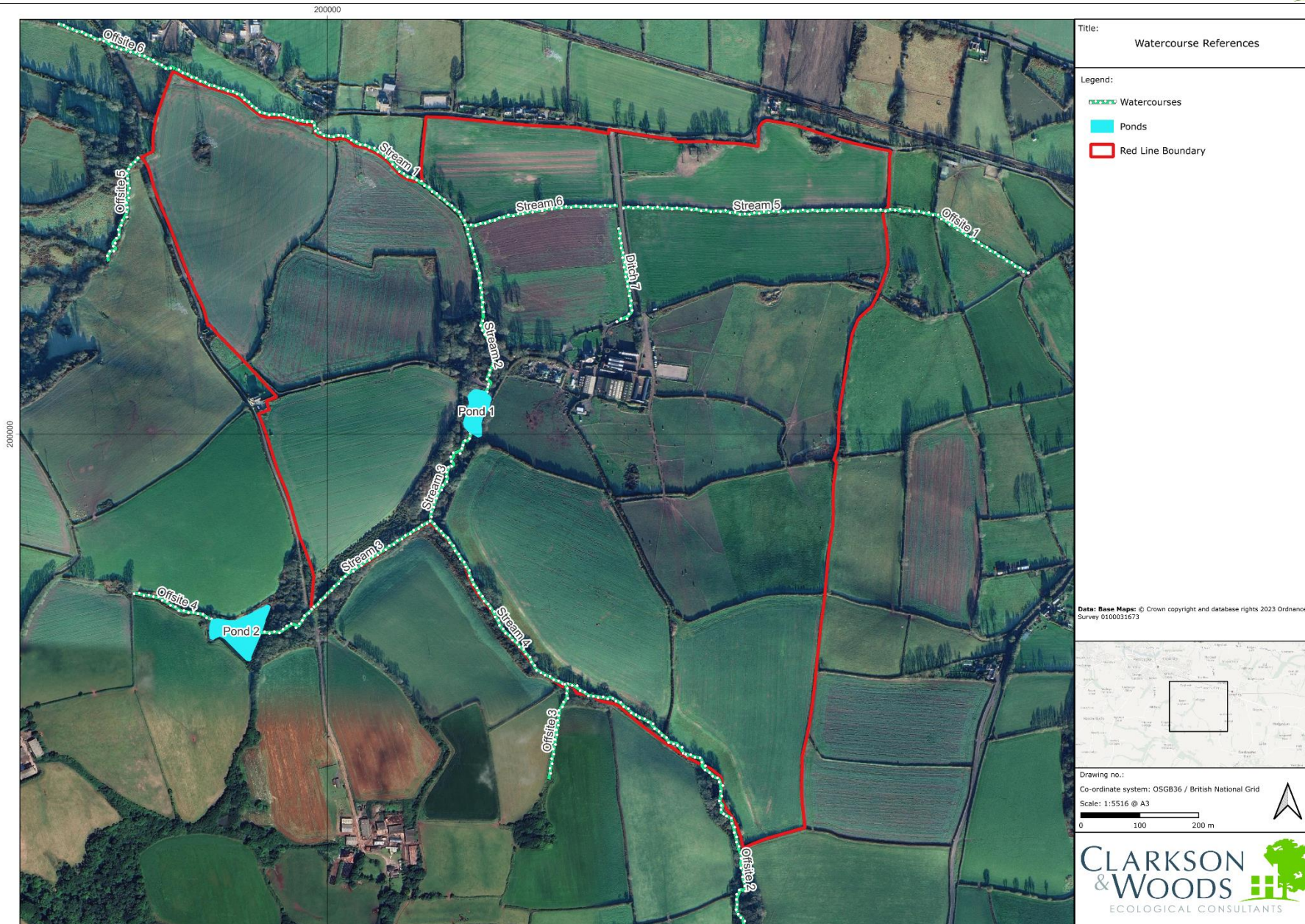


Figure 1: Waterbody References



3 RESULTS

3.1 Desk Study Information

Otter

- 3.1.1 Twenty-six records of otter were returned within 2km of the Site.
- 3.1.2 Otter is a Species of Principal Importance under the Environment (Wales) Act (2016) and listed on the Pembrokeshire Local Biodiversity Action Plan (LBAP). The population of otter in Wales is thought to be around 1000, although may be increasing due to recent banning of persistent organic pesticides⁷.
- 3.1.3 Otter are listed on the Pembrokeshire Bat Sites and Bosherton Lakes Special Area of Conservation (SAC) (approx. 4km southwest of the Site) as an Annex II species that are present, but are not the primary reason for designation.

Water Vole

- 3.1.4 No records of water vole were returned within 2km of the Site and no known population was identified within at least 10km of the Site. The species may be present in the wider area, although records suggest that if present, they are sparsely distributed.
- 3.1.5 Water vole is a Species of Principal Importance under the Environment (Wales) Act (2016). The water vole population in Wales is estimated at around 4500 and likely declining due to loss of suitable habitats as a result of agricultural practices⁷.

3.2 Field Survey Results

- 3.2.1 A summary of findings of each watercourse are provided within **Table 1**, below.

Table 1: Summary of Field Survey Results

Feature No.	Description	Summary of Suitability for Otter / Water Vole	Any Signs?
1	Stream section adjacent to the outside of the northern site boundary. Hedgerow on southern side. Two concrete bridges for farm access and disused wooded footbridges cross this section. Crops often cultivated to within 1m of the watercourse within this section. Generally steep banks to 2m high characterised this section.	Suitable but poor for otter and water vole due to being only seasonally wet and lack of optimal foraging resources.	No signs recorded.
2	Stream section running through centre of Site to west of hedgerow and through Alleston Wood. Section through woodland heavily shaded, with wet woodland habitat on either side. Banks very shallow here, almost flat in some areas. Water level generally low <20cm. The stream is culverted under the road where it flows north from Pond 1. This culvert was observed to be liable to flooding during wetter times of the year, when fast flowing water was observed to flow over	Good suitability for otter , particularly within the woodland, where greater foraging resources likely to be present. Suitable but poor for water vole due to being only seasonally wet, lack of optimal foraging resources and shallow banks further south.	Otter spraint identified on fallen tree across stream. Potential water vole burrow recorded in close proximity to western bank. No other signs were recorded.

⁷ Matthews, F. et al. in association with the Wales Mammal Biodiversity Action Forum (2020). *The State of Mammals in Wales*. A report by The Mammal Society for NRW.



	the road on few occasions through the winter.		
Pond 1	Large waterbody (c.0.3ha) lying directly south of Alleston Wood and access track, within area of wet woodland. Steep-sided valley immediately to west.	Good suitability to support low numbers of otter.	No signs recorded.
3	Stream section running south from Pond 1 characterised by a shallow (<0.5m depth), meandering channel with dense bramble cover on either bank. Heavily shaded. Few rushes recorded, but no in-channel vegetation.	Suitable but Poor for otter , which are likely to move around the landscape using this feature and others. Negligible suitability for water vole	No signs recorded.
4	Stream section running east-west adjacent to southern site boundary. A 2-2.5m wide channel with shallow (<20cm deep), fast flowing water. Mature trees and scrub, along with areas of wet woodland bounded the stream on either side. Large items of litter, including hay bales and an agricultural roller were noted within the channel, creating dammed sections of stream. Little-to-no in channel vegetation recorded.	Suitable but Poor for otter , which are likely to move around the landscape using this feature and others. Negligible suitability for water vole	Two holes identified beneath trees adjacent to the stream on either bank, may offer suitability as holt for otter. No other signs recorded.
5	Straightened section of stream, found to be seasonally wet. Hedgerow on southern side, while arable field cultivated to within 1m of northern bank. Generally highly disturbed as a result. Grasses and ruderal species recorded on the bank, although in-channel vegetation limited to water dropwort. Bramble frequently recorded. The ground was generally found to be very wet and soft.	Suitable but poor for water vole due to being only seasonally wet and lack of optimal foraging resources. Unsuitable for use by otter , unless to move around the landscape when holding water.	No signs recorded.
6			Prints identified in mud; likely to be rat. No other signs recorded.
7	Small (<30cm wide and deep) roadside ditch found to be seasonally wet. Hedgerow runs along western bank, while road immediately borders the east. Generally stoney with little in-channel vegetation.	Negligible suitability for use by otter or water vole due to very small size and only occasionally holding water.	No signs recorded.
Offsite 4	Large pond at end of stream with open edge, heavily poached by cattle. Banks of pond largely inaccessible as vegetated with dense scrub. Stream mostly inaccessible; however, 20m section accessed within woodland. This was heavily shaded with an extremely shallow channel (nearly flat). Channel overgrown with vegetation and contained shallow water (<10cm depth).	Pond suitable as foraging resource for otter , however stream suitable only as a commuting route for the species. Poor to negligible suitability for water vole due to over-shading and shallow banks.	Dense vegetation made survey very difficult to look for signs. Mammal paths in mud of stream bank recorded where accessible, although species could not be determined.



Offsite 5	Access limited due to presence of cattle and barbed wire. Cattle appeared able to access entire length of stream, which was heavily poached, where visible. Water was flowing steadily, but only <10cm depth. Sited within wooded valley, so heavily shaded.	Poor to negligible suitability for use by both species.	No signs recorded.
Offsite 6	Heavily shaded along much of length, with little-to-no in-channel vegetation recorded. Slow-flowing, shallow water (20-30cm depth). Multiple fallen logs noted across channel with woody vegetation on both banks. Occasional stony/silty islands. Adjacent fields largely grazed by horses and banks poached in places.	Poor suitability for water vole due to lack of foraging opportunity and overshading. Suitable for otter as a commuting route, though unlikely to support foraging.	Potential otter print (could not be confirmed) located near culvert under road. Frequent mammal paths along banks. No other signs.

3.3 Summary of findings

Otter

- 3.3.1 Habitat for otter conducive to forming part of a core territory or sustaining a population was restricted to the stream corridors found around the southern part of the Site (i.e. Streams 2 and 4) and ponds. That said, the streams and ditches within and around the Site were found to offer very limited feeding resources for otter. Other wet watercourses within the redline boundary did not offer typically suitable habitat for otter.
- 3.3.2 Otter field signs, notably spraint, was recorded on the section of stream within Alleston Wood, outside of the red line boundary. Cavities suitable for use by otter were also recorded adjacent to the stream south of the Site (Stream 4). These were monitored for a period of 10 days in June 2024 using trail cameras to ascertain whether they were in use by otters. No otters were recorded at the time of the survey, with the only mammals recorded being a brown rat on a few occasions. No other potential resting sites for otter were noted during the surveys with the exception of offsite habitat found within Alleston Wood. Otter were considered to be absent from within the Site during the day, with the only suitable resting places recorded offsite.
- 3.3.3 The drainage network within the Site comprised straightened sections of streams at field boundaries and a small roadside ditch of poor to negligible suitability for otter. This network may offer potential for otter to move around the landscape when wetted, although these did not hold water year-round. No field signs were recorded within the ditches.
- 3.3.4 While the streams and wooded corridors around the Site offer some suitable habitat connectivity to the SAC to the southwest of the Site, this habitat is not contiguous in the wider landscape, which is interspersed with open farmland and B-roads.
- 3.3.5 It is considered that otters may use poor or unsuitable habitat for sporadic dispersal, especially where adjacent to more suitable habitat.

Water Vole

- 3.3.6 The drainage network within the Site comprised straightened stream sections at field boundaries of generally suboptimal suitability for water vole. The streams associated with hedgerows, which were seasonally dry and lacked more suitable vegetation for foraging by water vole, were assessed as providing suitable but poor habitat for water vole. No evidence, such as latrines, feeding remains, or potential burrows, were recorded within these features.
- 3.3.7 The stream that bisects the Site (Stream 2) was assessed as providing suitable but poor habitat for water vole, for the most part due to very shallow banks and large areas of flood. One potential burrow was recorded outside of the red line boundary within Alleston Wood. No other evidence of water vole was recorded.
- 3.3.8 It is considered to be possible that water vole may use features within the Site, albeit at very low densities.



4 ECOLOGICAL EVALUATION

- 4.1.1 This section provides an analysis of the value of ecological receptors (otter and water vole) identified as occurring within or in proximity of the Survey Area.
- 4.1.2 Suitable habitat for otter and water vole within the survey area was restricted to the stream corridors and wet ditch on or adjacent to the Site. Field signs for otter were recorded along one stream section in the centre of the surveyed area (Stream 2), but outside of the red line boundary.
- 4.1.3 Considering the presence of otter within the riparian corridor of the stream, their presence on the Pembrokeshire LBAP, and with the Site being dominated by a network of seasonally dry ditches, otter are considered to be of **Local importance** in the context of the Survey Area (see **Table 2**, below).
- 4.1.4 Considering the comparatively lower habitat suitability for water vole, their limited presence in the wider area and lack of field signs, water vole are valued as being of **Local Importance**, if present, within the context of the Development (see Table 1, below).

Table 2: Ecological Evaluation

Species	UK status	County status	Level of activity on site	Ecological Importance
Otter	Scarce and widespread. GB population 11,000 GB IUCN: Least concern. The population has partial decline in Wales ⁸ since 2010.	Otters are present in Pembrokeshire and are generally well-distributed through the county.	Recorded present within offsite stream corridor and may use less suitable streams within and around the Site on occasion for commuting and dispersal. The Site offers some connectivity to the SAC to the southwest, although is not hydrologically or contiguously linked. Generally very low potential for sheltering during daytime, with opportunities limited to off-site sections of stream, notably Stream 4 to south of Site.	Local
Water vole	GB population of 132,000. Water voles were formerly widespread and common in England, Wales and Scotland, ranging from Cornwall to the extreme north-east of Scotland. They are still widespread but patchy and have undergone one of the most serious declines of any mammal in Britain. This long-term decline has continued in the last 10 years. Water voles are vulnerable to extinction in Great Britain, being Critically endangered in Wales.	Water vole are sparsely distributed in Wales and are considered extinct in all but a few locations. Recovery will rely on securing strongholds and the release of captive-bred individuals.	No confirmed evidence of water vole was identified with or adjacent to the Site. Water vole are considered unlikely to be present, although, since their presence cannot be completely ruled out, a precautionary approach with regards to these species will be adopted.	Local, if present

⁸ The Welsh National Survey for Otters. National Resources Wales and Cardiff University, 2021



4.2 Potential Sources of Impact

- 4.2.1 A full impact assessment will be carried out within the Environmental Statement prepared in support of the Alleston Solar Farm development. This section simply provides a summary of potential sources of impact on riparian mammals at this Site.
- 4.2.2 Otter and water vole may be impacted through direct harm (to animals or their burrows) or disturbance during any construction activity affecting ditches, watercourses and associated adjacent scrub, hedgerows or woodland habitat.
- 4.2.3 Construction activities and, potentially, routine operation and maintenance may cause disturbance to otters and water voles within sheltering locations and accidental harm to their habitat or burrows.
- 4.2.4 Riparian habitat quality is at risk of degradation through pollution resulting from run-off, sediment/dust deposition and contamination are possible during the construction phase.
- 4.2.5 Operational impacts are expected to be minimal as vehicle movements will be infrequent and limited, taking place outside of the installed buffer zones. This will significantly limit the risk of disturbance, pollution and damage impacts. Vehicle movement during construction and operation will be limited to daytimes, further reducing the likelihood of traffic collisions with otter, which tend to move around after dusk.

4.3 Considerations for Mitigation, Compensation and Enhancement

- 4.3.1 A full impact assessment will be carried out within the Environmental Statement prepared in support of the Alleston Solar Farm development.
- 4.3.2 The design of the Development is such that buffer zones will be installed prior to the onset of the construction phase, limiting movements of construction vehicles, plant, personnel and material within at least 10m of the stream and off-site ponds.
- 4.3.3 The detail of all protective measures to safeguard the suitability of habitats on Site for otters and water voles will be set out in a Construction Environmental Management Plan (CEMP), or similar. Such protection or mitigation could include pre-construction update surveys, seasonal timing and an Ecological Clerk of Works.
- 4.3.4 A Landscape and Ecological Management Plan (LEMP) or similar, would secure the favourable management of the Development's buffer zones for the duration of the consent, thereby maintaining and potentially enhancing the habitat quality of ditches and watercourses.
- 4.3.5 The removal of intensive agricultural activity from within the Site, particularly in proximity to the existing watercourses, will likely result in an indirect enhancement of these features through the cessation of herbicide/pesticide use, which is likely to leach into the adjacent waterbodies, in future.



APPENDIX A: WILDLIFE LEGISLATION & SPECIES INFORMATION

OTTERS

Otters and their holts are protected in Wales under the Conservation of Habitats and Species Regulations 2017, known as the 'Habitats Regulations'. This makes it an offence to deliberately kill or injure an otter, or to deliberately disturb an otter such that its ability to breed or rear young, or such that the species' distribution, were significantly affected. It is also an offence to damage or destroy any breeding site or resting place. Intentional or reckless disturbance of otters in their holts, and damage to or obstruction of holts are also offences under the Wildlife and Countryside Act 1981 (as amended). Penalties for offences against otters or their holts include fines of up to £5,000 and/or up to six months in prison.

Any development works which are likely to involve the loss of holts, or which could result in killing of or injury to otters (which are only likely to occur extremely rarely), need to take place under licence. Works which could disturb otters may also be licensable, though this is also rarely the case as the majority of developments on watercourses and coastal areas where otters are present can be carried out in a way which avoids significant disturbance.

Where it is necessary, licences can be obtained from the Welsh Government to permit works that would otherwise be illegal, provided it can be demonstrated that the proposed works are needed to protect public health or safety, or for other reasons of overriding public interest including social and economic reasons. It is also necessary to demonstrate that there is no satisfactory alternative to the proposed works, and that the conservation status of otters in the area will be maintained. Appropriate mitigation and post-construction monitoring are therefore a requirement of all licences.

WATER VOLES

Water voles *Arvicola amphibius* receive protection under the Wildlife and Countryside Act 1981 (as amended), which makes it an offence to: intentionally kill, injure, or take a water vole; intentionally or recklessly disturb a water vole whilst in its place of shelter; intentionally or recklessly damage, obstruct or destroy a water vole's place of shelter; or intentionally or recklessly obstruct access to a place of shelter. Penalties for offences against water voles include fines of up to £5,000 and/or up to six months in prison.

Works such as watercourse re-profiling, installing culverts, or topsoil stripping close to watercourses and ponds which could result in destruction or obstruction of burrows could be considered reckless, and/or could be considered intentional if water voles are killed or injured, unless measures are taken to minimise the risk of this occurring. Any inadvertent impacts on water voles despite these mitigation measures being in place would be considered an 'incidental result of an otherwise lawful operation' which 'could not reasonably have been avoided' and therefore not an offence.

In practice, mitigation for impacts of development on water voles generally comprise one or more of the following techniques: displacement, in which water voles are encouraged to move to suitable retained habitat by changing the management of areas affected by development; exclusion, where water vole-resistant fencing is provided between a development site and suitable retained habitat allowing animals to be trapped from the development footprint and released elsewhere on the site; and translocation, where animals are trapped from a development site and released on another suitable site nearby. Water vole mitigation proposals, particularly those involving translocation of animals, should be agreed in advance with Natural Resources Wales.

UK BIODIVERSITY ACTION PLANS

The UK Biodiversity Action Plan (UK BAP) 2011 is a policy first published in 1994 to protect biodiversity and stems from the 1992 Rio Biodiversity Earth Summit. The policy is continuously revised to combine new and existing conservation initiatives to conserve and enhance species and habitats, promote public awareness and contribute to international conservation efforts. Each plan details the status, threats and unique conservation strategies for the species or habitat concerned, to encourage spread and promote population numbers.

Species or habitats identified as priorities under the UK Biodiversity Action Plan receive some status in the planning process through their identification as Species/Habitats of Principal Importance in Wales under the Environment (Wales) Act, 2016.



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