

Appendix A. Site Location Plan





 Existing Building



P01	03/03/2026	For cost information	ED	JH	RC
Rev.	Date	Description	By	Cnk'd	App'd

Drawing Suitability	For Information	Status S1
 AtkinsRéalis		
www.atkinsrealis.com		
Client	WEST SUSSEX COUNTY COUNCIL	

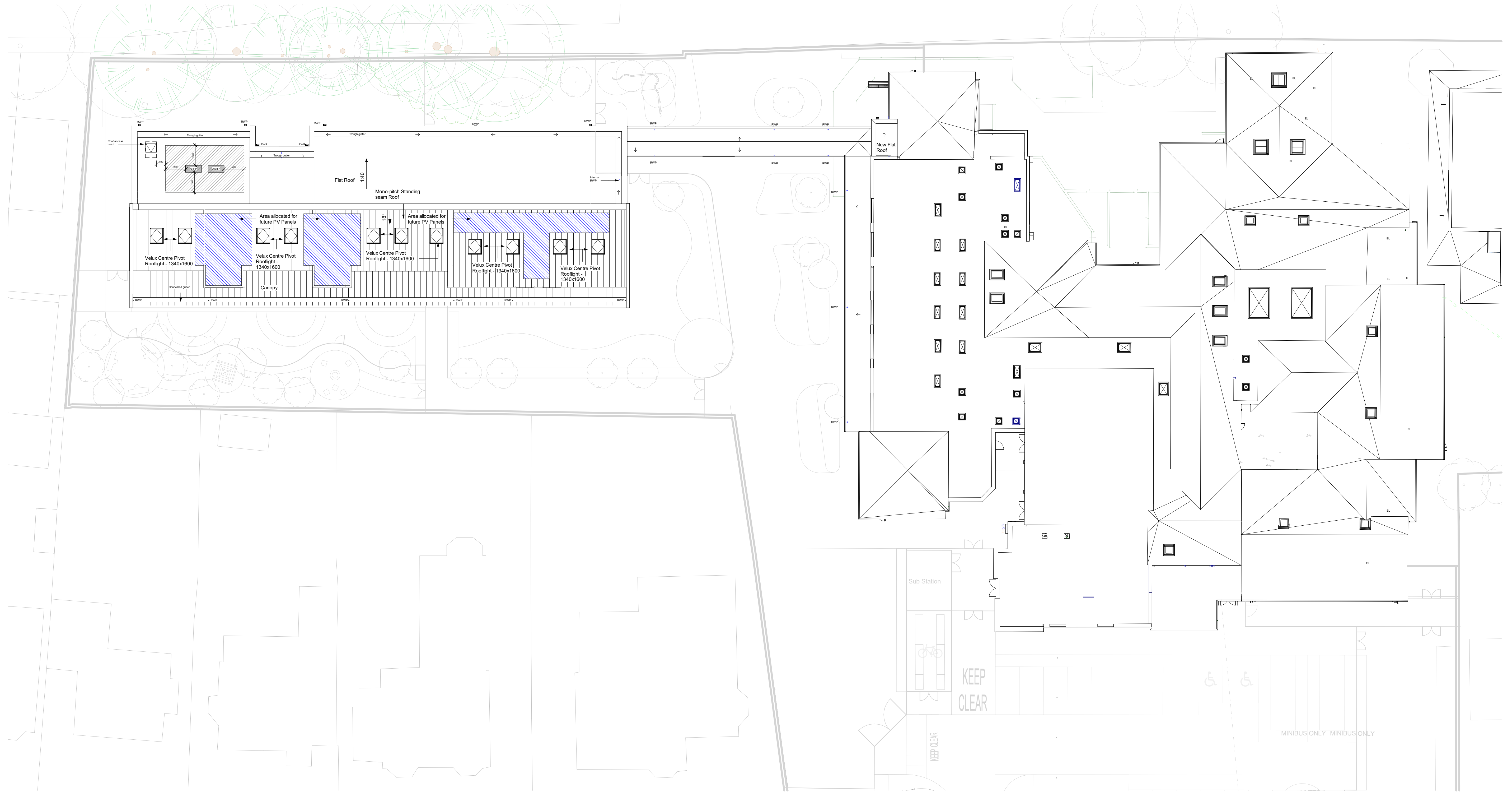
Project Title						Homefield Primary School	
Drawing Title							
Site Location Plan							
Scale	Designed	Drawn	Checked	Authorised			
As indicated	ED	ED	SV	RC			
Original Size	Date	Date	Date	Date	Revision		
A1	Jan 26	Jan 26	Jan 26	Jan 26			
Drawing Number					Revision		
HMF-ATR-00-XX-D-A-021001					P01		

Appendix B. Proposed Development

B.1 Roof Plan

This plan shows outline of proposed new building.





P01	08/06/2026	For Costing				ED	JH	RC	
Rev.	Date	Description				By	Chk'd	App'd	

Drawing Suitability	For Costing	Status \$2
 AtkinsRéalis		
Client  west sussex county council		

Project Title Homefield Primary School - Proposed New SSC and Reception Classrooms Building					
Drawing Title Proposed Roof Plan					
Scale	Designed	Drawn	Checked	Authorised	
1 : 200	ED	KK	JH	RC	
Original Size	Date	Date	Date	Date	
A1	July 2026	July 2026	July 2026	July 2026	
Drawing Number				Revision	
HMF-ATR-01-RF-D-A-151006				P01	

Atkins Project Number: HMF

B.2 Landscape External Arrangement



[illegible]

Scale 1:1000

10m 0m 10m 20m 30m 40m 50m 60m 70m

Land Ownership boundary

Planning application redline boundary

Building footprint / Ancillary structure

Building canopy

Car Park / Access road

	Existing trees to be retained
	Existing trees removed
	New trees
	Amenity & Sensory planting
	Amenity grass area
	Buffer / Wildflower planting area

-  Hard Games Area
-  Key paths
-  Breakout areas
-  Outdoor teaching areas
-  Safety surface material (TBC)
-  Shared Surface

High Fence & Gates
(2.4m T.B.C)

Low Fence & Gates
(1.2m T.B.C)

Sustainability	Authorized (Stage 3)	Status A3	Project Title Homefield Primary School							
 Nova North 11 Bressenden Place Westminster London SW1E 6BY Tel: +44 (0)20 7121 20000 www.atkinsrealis.com © AtkinsRealis (2026)			Drawing Title Landscape External Arrangement							
			Scale	1:250 (OVERVIEW 1:1000)	Designed	YL	Drawn	YL	Checked	JH
Client West Sussex County Council			Original Size	A1	Date	2026-06-16	Date	2026-06-16	Date	2026-06-16
			Drawing Number	CHPS-ATR-XX-XX-D-L-401001					Revision P03	

Appendix C. Methods

C.1 Desk Study

The geographical area for obtaining ecological data through desk studies has been determined using best practice guidance and professional judgement. Baseline data has been gathered from a range of sources through data request and using online resources as outlined below. This included data gathering in relation to statutory and non-statutory designated sites for nature conservation and protected and priority habitats and species (as defined by CIEEM PEA guidance¹¹), and an assessment of the likely importance of habitat features present for such species was also undertaken during the walkover survey.

The study areas used for the data gathering are detailed in Table 2-1. The desk study was undertaken in December 2025 and February 2026.

The following online resources were accessed in February 2026:

- Multi-Agency Geographic Information for the Countryside (MAGIC) website¹² to check for statutory designated sites, ancient woodland, priority habitats and European Protected Species Licences;
- Woodland Trust Ancient Tree Inventory¹³

Ordnance Survey maps¹⁴ were used to identify the presence of waterbodies within 500 m of the Site boundary, in order to establish if the land within and immediately surrounding the Site could be used as terrestrial habitat for great crested newts. This species typically uses suitable terrestrial habitat up to 500 m from a breeding pond¹⁵. However, there is a notable decrease in great crested newt abundance beyond a distance of 250 m from a breeding pond¹⁶.

Sussex Biodiversity Records Centre (SxBRC) was contacted in December 2025 to request records of protected and priority species and habitats and details of non-statutory designated sites for nature conservation. These were provided by SxBRC on 09/01/2026.

Table C-1 - Data search areas

Data type	Search area – distance from Site boundary
Statutory designated sites for nature conservation	1 km
Non-statutory designated sites for nature conservation	1 km
Irreplaceable habitats	1 km
Veteran trees	1 km

¹¹ As set out in Box 1 on page 4 of the CIEEM (2019) Guidelines for Preliminary Ecological Appraisal, priority species include those listed as a national and/or local priority for conservation (i.e. a Habitat of Principal Importance or Species of Principal Importance in England under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006;), International Union for the Conservation of Nature (IUCN) Red List or Amber List, Nationally Rare or Nationally Scarce, or endemic to a country or geographic location.

¹² Multi-Agency Geographic Information for the Countryside (MAGIC) [Online]. Available at: <https://magic.defra.gov.uk/> [Accessed 28/02/2026].

¹³ Woodland Trust *Ancient Tree Inventory* [Online]. Available at: <https://ati.woodlandtrust.org.uk/> [Accessed 28/02/2026].

¹⁴ Available on MAGIC [Accessed 18/12/2025]

¹⁵ English Nature (2001) *Great Crested Newt Mitigation Guidelines*. English Nature, Peterborough.

¹⁶ English Nature (2004). *An assessment of the efficiency of capture techniques and the value of different habitats for the great crested newt (ENRR576)* [Online]. Available at: <http://publications.naturalengland.org.uk/publication/134002> [Accessed 28/02/2026].



Data type	Search area – distance from Site boundary
Priority habitats	1 km
Protected and priority species	1 km (2 km for records of bats)

C.2 Field Survey

The geographical area for undertaking ecological field surveys has been determined using the current survey guidance, professional judgement and the zones of influence, which have been determined based on likely effects arising from the Proposed Scheme.

Following CIEEM's Guidelines for Preliminary Ecological Appraisal² a walkover survey was undertaken, focusing on protected and priority habitats and/or species.

The walkover survey was undertaken on 29/10/2025. At the time of the survey, a draft application Site boundary had not yet been provided, so the survey covered all land within the school grounds, but focused on the area to the west and south of main school buildings understood to be affected by the Proposed Development. Following the visit, a draft application site boundary was issued. The survey area and the draft application boundary are shown on the Habitat Survey Plan in **Appendix E.1**, indicated by the blue and red lines respectively.

Biodiversity Net Gain (BNG) habitat condition assessments were carried out at the same time as the site survey. This will be reported separately¹⁷.

C.2.1 Habitats

Habitats were mapped using the UK Habitat Classification (UKHab) v2.0 system¹⁸. UKHab is a comprehensive and hierarchical habitat classification system for the UK that has been developed to benefit from recent changes in habitat categorisation, recording and analysis, and is suitable for digitally recording in the field using GIS. All habitats were recorded to at least Level 3 of the UKHab hierarchy, i.e. broad habitats such as neutral grassland or dense scrub. In addition, 'Essential Secondary Codes' have been recorded to describe habitat mosaics, complexes and their origins. All habitat features have been digitally mapped, using QGIS, as either polygons, lines or points and assigned to a UKHab Primary Habitat Code.

An assessment of the possible presence of priority habitats (as defined by CIEEM Preliminary Ecological Appraisal guidance I²) was also undertaken during the walkover survey.

Vascular plant names recorded during this survey follow Stace¹⁹.

Target notes (TNs) were used to record specific details on the plant species composition of the habitats, current management and quality. TNs were also used to record features of ecological importance (e.g. ponds, complex habitat mosaics).

¹⁷ BNG baseline data and metric will be provided separately in require templates. BNG assessment will be required at RIBA Stage 3 to submit with an planning application.

¹⁸ UKHab Ltd (2023). UK Habitat Classification Version 2.0 (at <https://ukhab.org>)

¹⁹ Stace (2019) *New Flora of the British Isles* 4th edition.



C.2.2 Protected and Priority Species

An assessment of the possible presence of protected or priority species (as defined by CIEEM Preliminary Ecological Appraisal guidance ¹²), and an assessment of the likely importance of habitat features present that could support such species was also undertaken during the walkover survey.

Surveyors used current guidance and methodologies, as referenced by CIEEM, for preliminary assessment of species.

The survey comprised assessing the suitability of the habitats present for, and recording any activity of the following species (in line with current guidance):

- Badgers²⁰;
- Bats²¹;
- Hazel dormice²²;
- Otters^{23,24};
- Water voles²⁵;
- Breeding, wintering and passage birds²⁶;
- Reptiles²⁷;
- Amphibians (terrestrial and aquatic habitats), including an assessment of aquatic habitat for its suitability to support great crested newts using the Habitat Suitability Index (HSI) assessment²⁸;
- Priority invertebrates^{29,30};
- Priority plants³¹.

Evidence of the presence of the following invasive species was recorded where seen:

²⁰ Harris S., Cresswell P. and Jefferies D. (1989) *Surveying badgers*. Mammal Society – No9.

²¹ Collins, J. (ed.) (2023) *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition)*. The Bat Conservation Trust, London.

²² English Nature (2006). *The Dormouse Conservation Handbook (2nd edition)*.

²³ Chanin and Smith (2003). *Monitoring the otter Lutra lutra*. Conserving Natura 2000 Rivers Monitoring Series No 10. Peterborough, English Nature.

²⁴ Liles G. (2003). *Otter Breeding Sites. Conservation and Management*. Conserving Natura 2000 Rivers Conservation Techniques Series No. 5. English Nature, Peterborough.

²⁵ Dean, M. et al (2016) *The Water Vole Mitigation Handbook*. Mammal Society.

²⁶ Bird Survey & Assessment Steering Group. (2022). *Bird Survey Guidelines for assessing ecological impacts, v.0.1.7*. Available at: <https://birdsurguidelines.org> [Accessed 28/02/2026].

²⁷ Froglife (1999) *Reptile Survey: an introduction to planning, conducting and interpreting surveys for snake and lizard conservation*. Froglife advice sheet 10.

²⁸ Oldham R.S., Keeble J., Swan M.J.S. & Jeffcote M. (2000) *Evaluating the suitability of habitat for the Great Crested Newt (Triturus cristatus)*. Herpetological Journal 10 (4), 143-155 (2000).

²⁹ Buglife, Good planning practice for invertebrates: Surveys. Available at: <https://www.buglife.org.uk/resources/planning-hub/good-practice-planning-for-invertebrates/> [Accessed 28/02/2026]

³⁰ English Nature, Organising surveys to determine site quality for invertebrates. Available at: <https://publications.naturalengland.org.uk/publication/69045> [Accessed 28/02/2026].

³¹ At the present time there is no current survey guidance for priority plants and fungi. However, the SSSI selection guidelines for non-licensed fungi provide some survey methodologies for some groups. Available at: <https://hub.jncc.gov.uk/assets/d1fcb171-8086-4f5b-ade5-a34c5edc78c5>. [Accessed 28/02/2026].



- Evidence of animal species as listed on the Invasive Alien Species (Enforcement and Permitting) Order 2019; Chinese mitten crabs, red swamp crayfish, signal crayfish, spiny-cheek crayfish, muntjac deer, ruddy ducks, Egyptian geese and grey squirrels.
- Evidence of the presence of the following invasive plant species: Japanese knotweed, giant knotweed, hybrid knotweed, giant hogweed, Himalayan balsam, rhododendron³², New Zealand pigmy weed, Virginia creeper, variegated yellow archangel, cotoneaster³³, yellow azalea, few-flowered leek, montbretia, giant rhubarb, Japanese rose, three-cornered garlic, fanwort, floating pennywort, curly waterweed, water hyacinth, floating water primrose, parrot's feather and waterweeds (all species of the genus *Elodea*). These are listed in Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) and subject to strict legal control.

C.3 Preliminary Roost Assessment

AtkinsRéal's Ecologists undertook a Preliminary Roost Assessment (PRA) of the buildings and trees on Site on 30/10/2025 and categorised each building in line with current best practice guidance³⁴. Locations of the buildings surveyed have been presented on the Habitat Survey Plan in **Appendix E.1**.

The assessment of structures and trees for their suitability for roosting bats was restricted to only those sections of buildings or individual trees likely directly affected by the Proposed Development. This included the west section and elevation of the main school building (referenced Building B1) where extension or canopy construction proposed, and two external wooden structures west of B1 (referenced Building B2 and Building B3) which may require removal as part of the scheme. Other buildings on site (including Building B4) were not subject to PRA as they will not be affected by the Proposed Development (as currently understood).

The PRA of structures involved a detailed visual examination of structures externally, during daylight hours and aided with the use of binoculars, a bright torch, an endoscope and a ladder to reach specific features where possible. The PRA involved the identification of potential entry/exit points for bats or other potential roosting features such as holes in brickwork, cracks, and gaps in masonry, etc. A full systematic internal inspection of the buildings within the Survey Area was not undertaken at this time as it was not considered necessary based on the results of the external inspection. Structures were categorised based on their suitability for roosting bats following good practice guidance³⁴, which assigns each structure either None, Negligible, Low, Moderate or High suitability in line with Table C-2 below.

Table C-2 - Classification of suitability of a building to support roosting bats³⁴

Suitability	Description
Negligible	No obvious habitat features on site likely to be used by roosting bats, however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/ or suitable surrounding habitat to

³² Although there are approximately 1200 species of rhododendron, just one species and one of its hybrids are listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended): *Rhododendron ponticum* and *Rhododendron ponticum* x *Rhododendron maximum*.

³³ There are approximately 100 species of cotoneaster found in the UK, but only five are listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended): *Cotoneaster horizontalis*, *Cotoneaster integrifolius*, *Cotoneaster simonsii*, *Cotoneaster bullatus* and *Cotoneaster microphyllus*.

³⁴ Collins (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th Edition). The Bat Conservation Trust. London. Available at: https://cdn.bats.org.uk/uploads/pdf/Resources/For-professionals/Bat-Survey-Guidelines-23-FINAL-NO-PRINT-10.10.23.pdf?v=1696925348&_gl=1*216q1j*_ga*NDQ5OTkxOC4xNjk2MjM2MDcw*_ga_G28378TB9V*MTcwMDU3NzcwNC4xNy4wLjE3MDA1Nzc3MDQuMC4wLjA.



Suitability	Description
	be suitable for maternity and not a classic cool/ stable hibernation site but could be used by individual hibernating bats.
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection conditions, and surrounding habitat, but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation).
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. These structures have the potential to be support high conservation status roosts e.g. maternity or classic cool/ stable hibernation sites.

All trees potentially directly affected by the Proposed Development, were subject to a ground level tree assessment. This included a row of trees immediately adjacent to the north boundary of the Site (TN 3). Trees were inspected from ground level, using binoculars and high-powered torches where appropriate during daylight hours to look for PRFs such as rot holes, cracks, splits, or woodpecker holes that could potentially be used by roosting bats.

Each tree was assigned an initial category in line with current best practice guidance³⁴ and professional judgement as presented in Table C-3 below.

Table C-3 - Classification of suitability to support PRFs in trees³⁴

Suitability	Description
NONE	Either no PRF in the tree or highly unlikely to be any
FAR	Further assessment required to establish if PRFs are present in the tree
PRF	A tree with at least one PRF present

Each tree was also provisionally categorised for their suitability to support bats in accordance with the highest value PRF noted on the tree (if present and inspectable from ground level) in line with best practice guidance and professional judgement as presented in Table C-3 below. Where possible to reach from ground level, features were also inspected with an endoscope.

Table C-4 - Classification of the suitability of PRFs for bats³⁴

Suitability	Description
PRF-I	PRF is only suitable for individual bats or very small numbers of bats either due to size or lack of suitable surrounding habitats.
PRF-M	PRF is suitable for multiple bats and therefore may be used by a maternity colony.



C.4 Surveyor Competencies

All the surveys were led by surveyors who have been assessed to be at least of capable experience following the CIEEM competency framework³⁵.

Habitat categorisation and mapping was undertaken by a surveyor with Field Identification Skills Certificate Level 4.

The bat preliminary roost assessment was carried out by a surveyor who holds an appropriate Level 2 licence from Natural England³⁶.

C.5 Limitations

This section identifies any limitations to the surveys or assessment and provides an explanation as to the effect of these on the appraisal.

The search for waterbodies within 500 m of the Site was undertaken by using Ordnance Survey plans and aerial photographs only. These sources may not show all waterbodies within 500 m of the Site boundary (e.g. garden ponds) and, therefore, some waterbodies may not have been identified.

The survey was carried out in October 2025, outside the core growing season for many plants. However, based on the habitats present at the Site (urban habitats with vegetated garden), this is not considered a limitation to the assessment.

Trees along the north boundary of the Site could only be viewed from their southern aspect. This means that potential roosting features for bats on the north side of the trees would not have been visible to the surveyors. This limitation is addressed by taking a precautionary approach in the recommendations of this report.

The list of invasive plant species included on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) is extensive and these plants are found in a range of different habitats, including aquatic habitats. The field survey checked for the presence of Japanese knotweed, giant knotweed, hybrid knotweed, giant hogweed, Himalayan balsam, rhododendron, New Zealand pigmy weed, Virginia creeper, variegated yellow archangel, cotoneaster, yellow azalea, few-flowered leek, montbretia, giant rhubarb, Japanese rose, three-cornered garlic, fanwort, floating pennywort, curly waterweed, water hyacinth, floating water primrose, parrot's feather and waterweeds (all species of the genus Elodea). Other invasive species listed in Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) may not have been recorded.

The desk study reviewed the Woodland Trust Veteran Trees inventory. This provides records of veteran trees, but is not an exhaustive list, and other veteran trees may be present in the area. The walkover survey aimed to identify such features and as such this is not considered a constraint.

SxBRC records are not exhaustive, and the absence of records does not necessarily demonstrate the absence of a species.

Ecological surveys are limited by factors which affect the presence of plants and animals such as the time of year, migration patterns and behaviour. The ecological surveys undertaken to support this PEA have not therefore produced a complete list of plants and animals, and the absence of evidence of any particular species should not be taken as

³⁵ CIEEM's Competency Framework. Available at: <https://www.cieem.net/competency-framework> [Accessed 28/02/2026].

³⁶ <https://www.gov.uk/government/publications/bats-survey-or-research-licence-level-2>



conclusive proof that the species is not present or that it will not be present in the future. The above limitation/s has/have been addressed through taking the precautionary approach within the appraisal.



Appendix D. Summary of Relevant Legislation

Species	Legislation	Relevant offences	Licensing procedures and guidance
Bats <i>European protected species</i>	Conservation of Habitats and Species Regulations 2017 (as amended) Reg 43.	Deliberately ³⁷ capture, injure or kill a bat; deliberate disturbance ³⁸ of bats; or damage or destroy a breeding site or resting place used by a bat. [The protection of bat roosts is considered to apply regardless of whether bats are present.]	Mitigation licences issued for development by Natural England (NE). Guidance documents: Bats: advice for making planning decisions (NE 2022) European Protected Species: Mitigation Licensing - How to get a licence (NE 2013) Bat Workers' Manual (JNCC 2004) Bat Mitigation Guidelines (Reason, P.F. and Wray, S. 2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th Edition (BCT 2023)
	Wildlife and Countryside Act 1981 (as amended) Schedule 5, Section 9.	Intentionally kill, injure or take a bat; intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection or disturb ³⁹ a bat in such a place.	Licence from NE is required for surveys (scientific purposes) that would involve disturbance of bats or entering a known or suspected roost site.
Badgers	Protection of Badgers Act 1992.	Wilfully kill, injure or take a badger; or intentionally or recklessly damage, destroy or obstruct access to a badger sett or disturb a badger in its sett. [It is not illegal to carry out disturbance activities in the vicinity of setts that are not occupied]	When assessing the requirement for a licence in respect of development, Natural England ⁴⁰ state that badgers are relatively tolerant of moderate levels of noise and activity around their setts, and that a low or moderate level of apparent disturbing activity at or near to badger setts does not necessarily disturb the badgers occupying those setts. Where required, licences for development activities involving disturbance or sett interference or closure are issued by NE. Licences for activities involving watercourse maintenance, drainage works, or flood defences are issued under a separate process. Licences are normally not granted from December to June inclusive because cubs may be present within setts.

³⁷ Deliberate capture or killing is taken to include "accepting the possibility" of such capture or killing.

³⁸ Deliberate disturbance of animals includes in particular any disturbance which is likely a) to impair their ability (i) to survive, to breed or reproduce, or to rear or nurture their young, or (ii) in the case of animals of hibernating or migratory species, to hibernate or migrate; or b) to affect significantly the local distribution or abundance of the species to which they belong.

³⁹ Lower levels of disturbance not covered by the Conservation of Habitats and Species Regulations 2017 (as amended) remain an offence under the Wildlife and Countryside Act 1981 (as amended) although a defence is available where such actions are the incidental result of a lawful activity that could not reasonably be avoided.

⁴⁰ [Interpretation of 'Disturbance' in relation to badgers occupying a sett \(NE 2009\)](#)



Species	Legislation	Relevant offences	Licensing procedures and guidance
			Guidance documents: Badgers: advice for making planning decisions (NE 2022)
Birds	Wildlife and Countryside Act 1981 (as amended) Schedule 1 (some species only).	Intentionally kill, injure or take any wild bird; intentionally take, damage or destroy the nest of any wild bird while that nest is in use or being built; intentionally take or destroy the nest or eggs of any wild bird. Intentionally or recklessly disturb a Schedule 1 species while it is building a nest or is in, on or near a nest containing eggs or young; intentionally or recklessly disturb dependent young of such a species [e.g. most birds of prey, kingfisher, barn owl, black redstart, little ringed plover].	No licences are available to disturb any birds in regard to development. Licences are available in certain circumstances to damage or destroy nests, but these only apply to the list of licensable activities in the Act and do not cover development. General licences are available in respect of 'pest species' but only for certain very specific purposes, e.g. public health, public safety, air safety. Guidance documents: Wild birds: advice for making planning decisions (NE 2022)
Great crested newts <i>European protected species</i>	Conservation of Habitats and Species Regulations 2017 (as amended) Reg 43.	Deliberately ³⁷ capture, injure or kill a great crested newt; deliberate disturbance ³⁸ of a great crested newt; deliberately take or destroy its eggs; or damage or destroy a breeding site or resting place used by a great crested newt.	Mitigation licences for development are issued by NE. Guidance documents: Great crested newts: advice for making planning decisions (NE 2022) Great Crested Newt Mitigation Guidelines (English Nature 2001)
	Wildlife and Countryside Act 1981 (as amended) Schedule 5, Section 9.	Intentionally kill, injure or take a great crested newt; intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection or disturb ³⁹ a great crested newt in such a place.	Licences issued for science (survey), education and conservation by Natural England.
Adders Common lizards Grass snakes Slow worms	Wildlife and Countryside Act 1981 (as amended) Schedule 5, Section 9.	Intentionally kill, injure or take any widespread reptile species.	No licence is required⁴¹. However, an assessment for the potential of a site to support reptiles should be undertaken prior to any development works which have potential to affect these animals. Natural England advise that where reptiles are present, they should be protected from any harm that might arise during the development works through appropriate mitigation.

⁴¹ Natural England will only consider licence applications to kill or injure reptiles in truly exceptional circumstances. Natural England will not be providing a definition or criteria of what constitutes 'exceptional circumstances' as these applications would need to be assessed on a case-by-case basis. Natural England expects developers and ecologists to continue to adhere to current best practice mitigation measures that avoid injuring and killing reptiles and which do not require a licence.

