

Ecology Team Consultation Response	
Date:	16.12.2025
Planning Ref:	4/25/2411/0F1
Description:	Full planning permission for the erection of 2no. buildings for B2 general industrial and ancillary office use, comprising 6,356sqm GEA floorspace, associated car parking, hard and soft landscaping, associated infrastructure and landscaping and biodiversity enhancements across the wider Leconfield Estate.

Suggested Planning Conditions

Habitats Regulations Assessment (HRA)

A Shadow HRA is required to go through to the Appropriate Assessment stage which will have particular focus on:

- Pollution prevention measures detailed within CEMP; and
- Eradication and control of INNS through the INNS Management Plan.

Standard measures to reduce noise, dust, etc to be included within a Construction Environmental Management Plan ((CEMP), see below) in accordance with British Standard BS42020:2013.

Construction Environmental Management Plan (CEMP)

A CEMP should be produced to detail the procedures for protecting the environment during construction to address the following points (but not limited to):

- Pollution prevention control
- Dust mitigation
- Impaction of habitats
- Species protection during construction (see below)
- A sensitive lighting scheme for bats and other wildlife.

The CEMP must align with the sHRA.

Ecological Supervision

In order avoid committing a wildlife offence under the Wildlife and Countryside Act 1981 (as amended), the applicant must employ an Ecological Clerk of Works (ECoW) for the initial clearance works. The

ECoW will ensure the avoidance and protection of breeding birds, small mammals, herptiles (if any) and ensure the works adhere to the procedures set out in the CEMP.

Breeding Birds

All ground clearance works are undertaken outside of the nesting bird season (generally accepted as March to September inclusive). If this is not possible, a nesting bird check undertaken by a suitably qualified ecologist will be required to take place 48 hours prior to clearance works. Once complete, a 48-hour window will allow for the area to be made unsuitable for nesting in the area checked. If these works in the checked area are not completed within 48h, a further inspection may be required.

Should an active be identified all works within a suitable buffer of the nesting site must cease until the young have fledged/nesting ends. The size of the buffer will depend on the species of bird and will be confirmed by the ECoW.

Badgers and Small Mammals

All development work should be carried out with care to avoid badgers and small mammals such as hedgehogs. Contractors should be briefed about the potential presence of hedgehogs and Works should be supervised during initial clearance of the Site to avoid injury to any disturbed individuals.

The following precautionary working measures as outlined in the Reasonable Avoidance Measures (RAMS) report (Tetra Tech , 2024i) to avoid accidental harm to badgers and other mammals are required during the construction phase:

- During construction, any trenches, ditched and holes dug on site should either be backfilled overnight, covered, or left with a suitable ramp in place when the site is un-occupied to allow any mammals to escape if they become trapped.
- Any excavations should be checked every morning prior to commencing to works to confirm the absence of badgers and other mammals.
- Any pipes stored or being installed on site should be capped to reduce the risk of animals climbing into them.
- Should an active sett be identified during the pre-commencement survey, it should be retained under the final development plan and an appropriate buffer zone should be implemented whereby no construction works can take place. If this is not possible, appropriate mitigation would be required to enable the existing sett to be closed under a licence from Natural England. The standard licence period for badger sett closure is between 1st July to 30th November inclusive in any given year.

Red Squirrel

A pre-works check of woodland areas for squirrel drey and feeding signs a minimum of three months before works commence see RAMS report (TetraTech, 2024).

If red squirrel are found on site, exclusion areas of 50m to drey sites will be applied.

The CEMP should include appropriate precautionary working measures of red squirrel.

Bats

Mitigation for foraging and commuting bats along the woodland boundary adjacent to the eastern boundary is to include a sensitive lighting scheme that avoids light spill in this area and maintains it as a dark corridor. This includes:

- The use of LED warm lights, which have no UV output, therefore attracting fewer insects with warmer colours reducing impacts on bats.
- The inclusion of lux plots during detailed design of the lighting plan, which will show predicted lux level change across the site and demonstrate avoidance of external light spill on the woodland boundary.
- The use of a dimming feature if flood lights are used, working alongside the typical timeclock and photocell, in order to keep lux levels as low as possible during the active bat season (March to September inclusive) between dusk and dawn (when bats are emerging and re-entering roosts and during peak foraging times).
- Keeping the lighting column height as low as possible (<4m) in order to keep light directional and below the horizontal line; and
- All external lighting being compliant with the Institute of Lighting Professionals (ILP, 2023) guidance.

Invertebrates

Reasonable avoidance measures see RAMS report (Tetra Tech , 2024i) for dingy skipper and cinnabar moth caterpillars and foodplants that may be present in different areas of the site are as follows:

- A toolbox talk delivered by an ECoW will cover identification of the cinnabar moth and dingy skipper caterpillars and foodplants.
- Prior to site clearance works, the ECoW will walk the site to identify any of the foodplants within the works area with caterpillars of dingy skipper or cinnabar moth present.

- These plants and any caterpillars will be translocated to a suitable receptor area determined by the ECoW. Prior to site clearance works, the ECoW will collect seed from the food plants of dingy skipper.

Reptiles

All vegetation clearance is to be undertaken following reasonable avoidance measures see RAMS report (Tetra Tech , 2024i):

- Where clearance of grassland is undertaken this should be preceded by a fingertip search by the ECoW.
- Contractors must adhere to precautionary methods such as storing materials off the ground and capping any open excavations and dismantling any piles of rubble by hand.
- If any reptiles are found during the works period, they should be allowed to escape unharmed, and an ecologist contacted for advice. If numerous reptiles are found works should cease and methodology be re-evaluated.

The above precautionary methods should be detailed within the CEMP.

Great Crested Newt (GCN)

Precautionary working methods are recommended during the construction phase to avoid harm to GCN and common amphibians.

Measures recommended as outlined in the RAMS report (Tetra Tech , 2024i) include:

- Timing works to minimise any potential impacts pre- and during construction;
- Site clearance (such as removal of brash piles or vegetation) should ideally be undertaken between April and October (or in temperatures above 5oC) when amphibians are active (bearing in mind that a nesting bird check will be required);
- All further vegetation clearance to be undertaken under the supervision of an experienced ecologist (under a ECoW) who will give a detailed Toolbox Talk prior to the start of each working day.
- Immediately prior to site clearance works, an ECoW should finger-tip search and check all of the refugia and sheltering places for animals. This will then be followed by the removal of the refugia under the supervision of the ECoW.

- The methods of vegetation removal include a directional two-stage cut (working towards retained habitats on and beyond the site boundaries to maintain connectivity) where a fingertip search by the ecologist will be conducted prior to both cuts.
 - The first cut should be to a height of approximately 15 cm with the second cut to take down to ground level.
- Any existing soil / brash / log piles acting as potential hibernacula should be removed under supervision of the ecologist. Any pipes stored, or installed on-site, with a diameter of greater than 200mm should be inspected and covered or capped at night to reduce the risk of animals becoming trapped inside.

All precautionary measures should be captured within the site's CEMP.

Invasive Non-Native Species (INNS)

General precautionary measures to prevent the introduction and spread of INNS should be undertaken as outlined in the INNS assessment and management plan and RAMS report (both by TetraTech in 2024).

Toolbox talks should be conducted prior to works to ensure the contractors are aware of the potential for invasive species on site. Best working methods, including pollution prevention methods, should be outlined in the CEMP to limit the spread of invasive plant species.

In the event an INNS is identified; findings should be reported to the ECoW. If present, a specialist contractor should be contacted and the INNS left undisturbed and cordoned off with an exclusion zone of at least 3m. This buffer is to be extended to 7m for Japanese knotweed.

Biodiversity Net Gain

No development hereby permitted shall commence until:

- a) a Biodiversity Gain Plan has been submitted to the planning authority demonstrating a 10% net gain,
- b) the planning authority has approved the plan in writing,
- c) the onsite habitat provision is accompanied by a Habitat Management and Monitoring Plan in place for 30 years as the gains here constitute 'Significant On-site Gains', this monitoring plan is to be accepted by the council and,
- d) the off-site provision is secured through a Section 106 for a period of 30 years, and is approved by the council in writing, all purchased off-site provision from 3rd party providers must be accompanied by a certificate of purchase which is to be accepted by the council.

e) Monitoring results are to be programmed to be submitted to the council. These should include evidence demonstrating how BNG is progressing towards achieving its objectives, evidence of arrangements and any rectifying measures needed. The development shall be carried out in accordance with the approved plans.