

██████████  
Savills  
33 Margaret Street  
London  
W1G 0JD



Our ref: 121121  
17 January 2023

Dear ██████████

**Re: Response to Surrey Wildlife Trust's Ecology Planning Advice Service Regarding Proposed Development at Weybridge Business Park, Addlestone**

Further to receipt of comments from Surrey Wildlife Trust's Ecology Planning Advice Service regarding the proposed development at Weybridge Business Park in Addlestone, I set out responses from MKA Ecology Ltd in the table below.

Surrey Wildlife Trust Ecology Planning Advice Service Comment	MKA Ecology Ltd Response
<i>We would advise that the LPA reviews the actual biodiversity metric calculation used by MKA Ecology prior to determination.</i>	This should be done by the LPA as part of normal application review procedure.
<i>We would advise that the LPA seek clarification on why the woodland has been defined as being 'Other woodland, broadleaved' rather than 'Lowland Mixed Deciduous Woodland', prior to determination.</i>	<p>The woodland was classified as 'Other lowland mixed deciduous woodland' in the Preliminary Ecological Appraisal (PEA) and should be described as such within the Biodiversity Net Gain (BNG) assessment. A revised BNG report and calculator has been issued to reflect this change.</p> <p>The change in habitat classification from 'Other woodland, broadleaved' to 'Lowland Mixed Deciduous Woodland' lowers the predicted Biodiversity Net Gain from 69.00% to 63.25%, but</p>

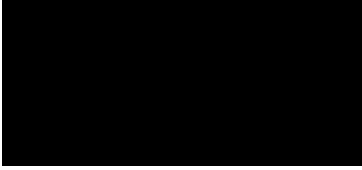
Surrey Wildlife Trust Ecology Planning Advice Service Comment	MKA Ecology Ltd Response
	this is still significantly above the required 10% threshold.
<i>The report states that a River Metric Assessment has been carried out, however, the report does not state the qualifications or experience of the ecologist who carried out this assessment. Usually in order to carry out a River Condition Assessment, the ecologist would need to have passed the MoRPh Modular River Survey Course. We would advise that this aspect of the survey methodology is confirmed prior to determination.</i>	We can confirm that Lydia Ennis ACIEEM, who carried out the River Condition Assessment, has indeed completed and passed the MoRPh Modular River Survey Course. A copy of her certificate of course completion can be provided upon request.
<i>We would advise that the LPA seek clarification that proposed tree removal within the 'Other Lowland Mixed Deciduous Woodland' has been assessed by MKA Ecology as part of the impact assessment and biodiversity net gain strategy submitted.</i>	The proposed tree removal has been considered within the impact assessment and BNG report for enhancement of the woodland.
<i>The updated Preliminary Ecological Appraisal and Preliminary Roost Assessment states that Jersey cudweed is present on-site. The Landscape Strategy documents submitted do not reference the presence of this Jersey cudweed and the importance of incorporating the species into the design consideration. There is no further detail provided on this, and therefore prior to determination, we would advise that the LPA seek further clarification. The clarification should include whether Natural England has been consulted and whether the project has the feasibility to provide a suitable receptor site. It is possible that a full, detailed strategy could be secured through a planning condition, but the outline information and feasibility (at least) should be understood prior to determination.</i>	Liaison with Natural England has been recommended within the PEA report and Construction and Environmental Management Plan (CEMP) in relation to the Jersey cudweed. This is an element which should be conditioned by the LPA and something we already propose to undertake.

Surrey Wildlife Trust Ecology Planning Advice Service Comment	MKA Ecology Ltd Response
<p><i>Should the LPA be minded to grant planning permission for this proposed development, we recommend that the LPA requires the development to be implemented in accordance with an appropriately detailed landscape and ecological management plan (LEMP).</i></p>	<p>We have been commissioned to produce a LEMP and have agreed that this would be completed post-submission, as this element is typically conditioned by the LPA within planning permissions.</p>
<p><i>Given the presence of ecological receptors on and off-site, there is a risk of causing ecological harm resulting from construction activities. Should the LPA be minded to grant permission for the proposal the applicant should be required to implement the development only in accordance with an appropriately detailed CEMP. This document will need to be submitted to and approved by the LPA in writing, prior to the commencement of the development.</i></p>	<p>We have recommended the production of a CEMP within the PEA report and have provided ecological input into CEMP, which has been provided as part of the planning submission, however this does not appear to have been provided to the Surrey Wildlife Trust.</p>
<p><i>The applicant should ensure that the proposed development will result in no net increase in external artificial lighting at primary bat foraging and commuting routes across the development site. We advise that compliance with this best practice guidance is secured through a Sensitive Lighting Management Plan submitted to the LPA for approval in writing prior to commencement of development. We would advise that this Sensitive Lighting Management Plan shows that there will no net increase in lighting across sensitive habitat such as Addlestone Bourne, Wey Navigation SNCI and the Woburn Park Stream SNCI.</i></p>	<p>The lighting management plan is an item for a lighting specialist, however MKA Ecology would be happy to provide input/ advice from an ecological perspective when this is available.</p>

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I trust this is clear and as expected, however if you have any queries regarding this letter report please feel free to contact me.

Yours sincerely,



Senior Ecologist

