

Rob Booth
DWD

Issued by email only

RE: MABEY BRIDGE REPLACEMENT WORKS, KEADBY POWER STATION, LINCOLNSHIRE

ECOLOGICAL TECHNICAL NOTE

Dear Rob,

RammSanderson Ecology Ltd (RS) was instructed by DWD Ltd to produce an Ecological Technical Note for the replacement of Mabey Bridge over the Hatfield Waste Drain (the Scheme). The bridge replacement is required to facilitate construction traffic over the Hatfield Waste Drain for a combined cycle gas turbine electricity generating station at Keady Power Station.

The aim of this Technical Note is to review potential impacts to and likely recommendations for protected species arising from Scheme implementation. The baseline for protected species has been gathered from extensive third-party ecological survey work undertaken for the new gas electricity generation station, including the Scheme in question.

This Technical Note also justifies why the Scheme is exempt from mandatory Biodiversity Net Gain under Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021).

EXEMPTION FROM MANDATORY BIODIVERSITY NET GAIN (BNG)

There are specific exemptions from BNG for certain types of development. The exemptions are set out in paragraph 17 of Schedule 7A of the Town and Country Planning Act 1990 and the Biodiversity Gain Requirements (Exemptions) Regulations 2024.

The Scheme qualifies under the 'de minimis exemption' as it does not impact an onsite priority habitat and impacts less than:

- 25 square metres of onsite habitat that has biodiversity value greater than zero; and
- 5 metres in length of onsite linear habitat.

The red line boundary for the Scheme comprises only developed land; sealed surface of the existing Mabey Bridge and adjacent roads (see Figure 1). Developed land; sealed surface has a biodiversity value of zero therefore the total biodiversity value of land within the red line boundary for the Scheme is zero.

The red line boundary for the Scheme is adjacent to the Hatfield Waste Drain, a primary river. In respect of Watercourse Habitats within the Statutory Metric, the DEFRA Statutory Metric User Guide (dated 3 July 2025) states (PG44):

'If the site boundary crosses into the riparian zone, you should:

- *include adjacent lengths of watercourse in the watercourse module.*
- *record and assess terrestrial habitats within the area and hedgerow modules if they are within the site boundary'.*

The red line boundary for the Scheme (the site boundary) does not cross the riparian zone¹ of the Hatfield Waste Drain and thereby the Scheme will impact less than 5m (a total of zero) linear habitats.

Given the above evidence, the Scheme is determined to be exempt from mandatory Biodiversity Net Gain under Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021).

THIRD-PARTY ECOLOGICAL SURVEY WORK

To inform the Scheme baseline conditions, the following Over Arup & Partners Ltd and AECOM Ltd ecological reports for the gas electricity generation station were utilised, which formed part of a Preliminary Environmental Information Report to inform the Development Consent Order:

- Volume I: Chapter 11 Biodiversity and Nature Conversation (Arup & AECOM 2024a).
- Volume II: Appendix 11C Preliminary Ecological Appraisal (Arup & AECOM 2024b).
- Volume II: Appendix 11D Confidential Badger Report (Arup & AECOM 2024c).
- Volume II: Appendix 11E Riparian Mammal Survey Report (Arup & AECOM 2024d).
- Volume II: Appendix 11F Aquatic Ecology Survey Report (Arup & AECOM 2024e).

The survey and assessment work presented in the above reports was undertaken between 2017-2024 and included the Scheme in question.

PROTECTED SPECIES

REVIEW OF ARUP & AECOM BASELINE EVIDENCE

Habitats

The UK Habitats Survey was undertaken in March 2024 (Arup & AECOM 2024b: PG13) and identified land within the Scheme as supporting predominantly developed land; sealed surface, comprising the existing Mabey Bridge and adjacent roads (Arup & AECOM 2024b: PG74 – habitat parcel 1).

Water Voles

The water vole survey work for the Hatfield Waste Drain concluded that: *'no evidence of water vole was recorded in 2023 or 2024 within the immediate vicinity of Mabey Bridge (20m either side) which is considered the likely reasonable extent of the footprint for the permanent works to replace the existing bridge. However, a single latrine was recorded away from this area (SE 80296 10035) in 2023, approximately 30m from the bridge, confirming the presence of the water vole within the watercourse'* (Arup & AECOM 2024d: PG15-16).

Otters

The otter survey work for the Hatfield Waste Drain concluded that: *'limited evidence of otter was recorded (a slide and a spraint) across Hatfield Waste Drain in the 2023 surveys, but no evidence was found to suggest that Mabey Bridge is of specific importance for otter. No otter evidence was observed during the 2024 survey. No evidence of otter resting places was found in association with the scrub on the bank of the drain next to Mabey Bridge. Furthermore, consideration was also given to potential resting places within the zone of disturbance (circa 100m either side of the bridge), but the lack of bankside trees and scrub meant that there were no features that otter could use for shelter'* (Arup & AECOM 2024d: PG16)

Badgers

The badger surveys were undertaken in March 2023 and March 2024 (Arup & AECOM 2024c: PG4). The only badger setts identified were located within the existing infrastructure area of Keady Power Station itself, at a separation distance of 2km from the Scheme. No badger setts were identified within 30m of the Scheme.

Aquatic Invertebrates and Fish

The scoping assessment for aquatic invertebrates and fish concluded that *'the Hatfield Waste Drain at this location will likely support a diverse fish/invertebrate assemblage typical of lowland watercourses. Requirements to replace Mabey Bridge will not directly impact the watercourse and therefore, no meaningful impacts on fish/invertebrates are anticipated during construction'* (Arup & AECOM 2024b: PG136; Arup & AECOM 2024e: PG4).

¹ As defined on PG43 and P45 of the DEFRA Statutory Metric User Guide (dated 3 July 2025).

Other Species

The scoping assessments identified the following species to be absent: great crested newts (Arup & AECOM 2024b: PG49) and white clawed crayfish (Arup & AECOM 2024b: PG57). Reptiles were identified as only likely to be present on a transitory basis, with 2017 survey work finding only a juvenile grass snake at Keady Ash Tip 1km north-east of the Scheme (Arup & AECOM 2024b: PG55-56). Hedgehog, common toad, brown hare, harvest mice and breeding birds were identified as likely to be present where suitable habitat prevailed (Arup & AECOM 2024b: PG34-58). The scoping assessments did not identify the structure of Mabey Bridge as being suitable for roosting bats or nesting birds (Arup & AECOM 2024b).

ASSESSMENT AND RECOMMENDATIONS

Assessment

The Arup & AECOM baseline identified no evidence of water vole or otter within proximity to Mabey Bridge however it was determined that water vole could move into the works area prior to the commencement of construction, due to positive field evidence identified within the wider drain network (Arup & AECOM 2024b: PG136). There is therefore the potential for destruction and damage to water vole resting places and disturbance of these species during the replacement of Mabey Bridge. Otter resting places were determined unlikely to be present within 100m of Mabey Bridge due to a lack of suitable bankside habitat.

The Arup & AECOM baseline identified no evidence of badger setts within 30m of the Scheme, however there is the potential (albeit low potential) for badgers to dig new setts prior to the start of construction, within 30m Mabey Bridge. There is therefore the potential for destruction and damage to setts and disturbance to badgers occupying the setts during Scheme construction should a sett have established in the intervening period.

There may be the potential for nesting birds to be present within bankside vegetation in proximity to Mabey Bridge. There is therefore the potential for disturbance to nesting birds where bridge replacement is undertaken during the bird breeding season (generally taken to be March to August inclusive).

Recommendations

- Prior to commencing Scheme construction and as a precautionary measure, it is recommended that an updated water vole survey is undertaken along the Hatfield Waste Drain to determine potential presence of resting places. The water vole survey should be undertaken 10m either side of Mabey Bridge. In the low likelihood of resting places being identified, a suitable mitigation strategy should be produced and implemented during bridge replacement.
- Prior to commencing Scheme construction, it is additionally recommended that a badger survey is undertaken within 30m of Mabey Bridge and in any locations where the access tracks are to be upgraded. In the low likelihood of badger setts being identified, a suitable mitigation strategy should be produced and implemented during Scheme construction.
- Bankside vegetation 10m either side of Mabey Bridge should be cut back to prevent habitation by nesting birds and other species during construction. Where vegetation must be cut back during the nesting season (generally taken to be March to August inclusive), a suitably qualified ecologist should undertake a nesting bird survey immediately prior to vegetation clearance.
- Where no nesting birds are identified, the vegetation should be slowly and carefully cut back in stages from the top of the vegetation to ground level, allowing potential for any animals present to disperse. The vegetation should be kept short during the replacement of Mabey Bridge to limit the potential for animals to colonise.

I trust the information provided here is satisfactory at this time, should you have any queries, or require any clarifications, please do not hesitate to call me directly.

Yours sincerely,

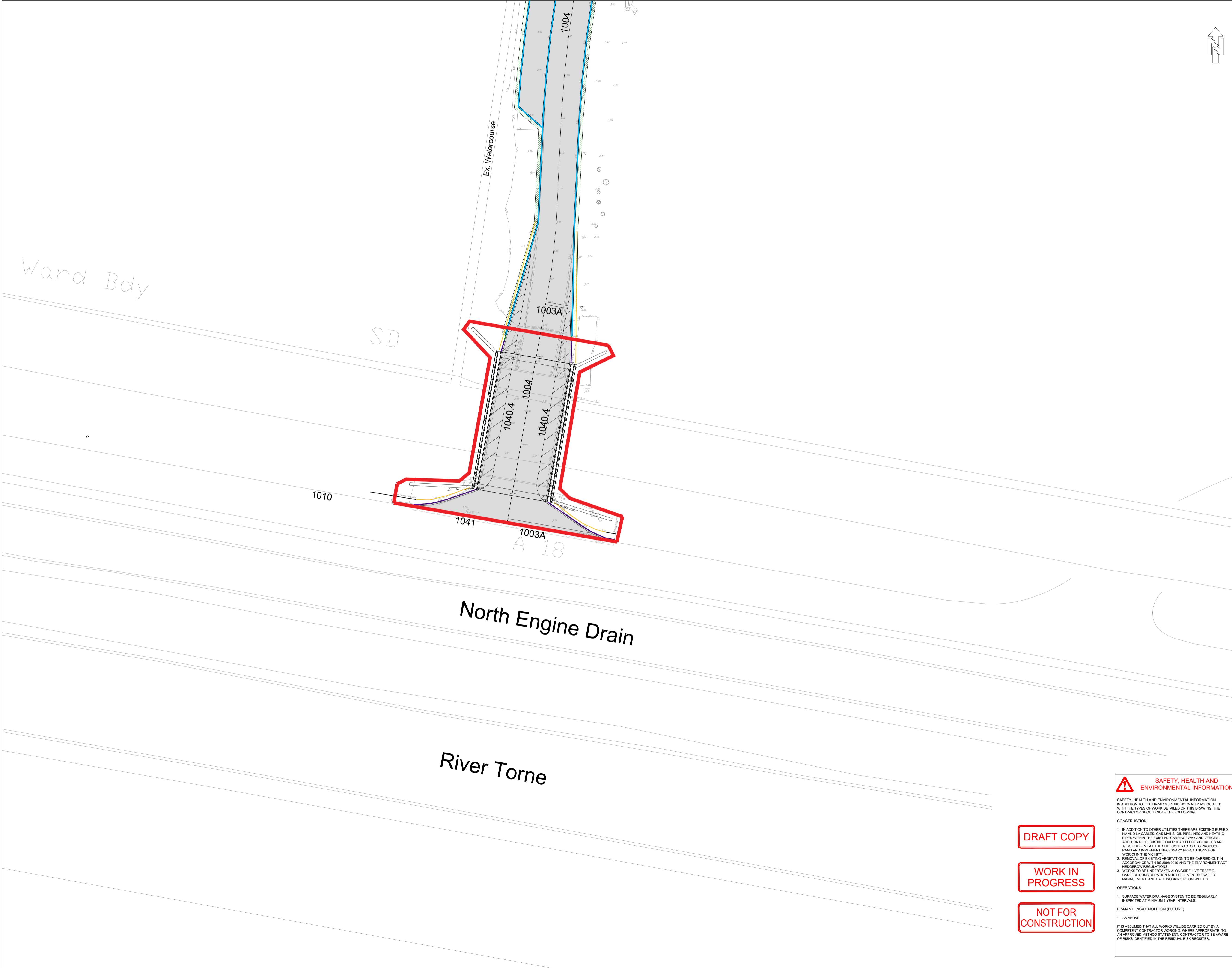
Steven Weber

Mobile:

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For and on behalf of RammSanderson Ecology Ltd.

FIGURE 1 – SCHEME RED LINE BOUNDARY



AECOM

PROJECT
 KEADBY ENABLING WORKS

CLIENT
 SSE THERMAL ENGINEERING AND ASSET MANAGEMENT

CONSULTANT
 AECOM
 ALDGATE TOWER
 2 LEMAN STREET
 LONDON, E1 8FA, UK
www.aecom.com

NOTES

KEY

SUITABILITY		
S2 FOR INFORMATION		
ISSUE/REVISION		
NO	DATE	DESCRIPTION
P09	04/07/2025	UPDATE BOUNDARY LINE
P08	15/05/2025	FOR INFORMATION ONLY
P07	10/04/2025	UPDATE BOUNDARY LINE
P06	03/03/2025	FOR INFORMATION ONLY
P05	28/11/2024	FOR INFORMATION ONLY
P04	30/10/2024	FOR INFORMATION ONLY
P03	28/10/2024	FOR INFORMATION ONLY
P02	28/10/2024	FOR INFORMATION ONLY
P01	28/10/2024	FOR INFORMATION ONLY
NO	DATE	DESCRIPTION

KEY PLAN

PROJECT NUMBER
 60732136

SHEET TITLE
 GENERAL ARRANGEMENT FOR PLANNING APPLICATION SHEET 1 OF 1

SHEET NUMBER
 60732136-ACM-STAP-DR-HW-9001

SCALE: 1:100 @A1 **REV:** P09

SAFETY, HEALTH AND ENVIRONMENTAL INFORMATION

SAFETY, HEALTH AND ENVIRONMENTAL INFORMATION IN ADDITION TO THE HAZARDOUSNESS NORMALLY ASSOCIATED WITH THE TYPES OF WORK DETAILED ON THIS DRAWING, THE CONTRACTOR SHOULD NOTE THE FOLLOWING:

CONSTRUCTION

- IN ADDITION TO OTHER UTILITIES THERE ARE EXISTING BURIED HV AND LV CABLES, GAS MAINS, OIL PIPELINES AND HEATING PIPES WITHIN THE EXISTING GARAGEWAY AND YARD. ADDITIONALLY, EXISTING OVERHEAD ELECTRIC CABLES ARE ALSO PRESENT AT THE SITE. CONTRACTOR TO PRODUCE RAMS AND IMPLEMENT NECESSARY PRECAUTIONS FOR WORKS IN THE VICINITY.
- REMOVAL OF EXISTING VEGETATION TO BE CARRIED OUT IN ACCORDANCE WITH BS 3698:2010 AND THE ENVIRONMENT ACT HEDGEROW REGULATIONS.
- WORKS TO BE UNDERTAKEN ALONGSIDE LIVE TRAFFIC. CAREFUL CONSIDERATION MUST BE GIVEN TO TRAFFIC MANAGEMENT AND SAFE WORKING ROOM WIDTHS.

OPERATIONS

- SURFACE WATER DRAINAGE SYSTEM TO BE REGULARLY INSPECTED AT MINIMUM 1 YEAR INTERVALS.

DISMANTLING/DEMOLITION (FUTURE)

- AS ABOVE.

IT IS ASSUMED THAT ALL WORKS WILL BE CARRIED OUT BY A COMPETENT CONTRACTOR WORKING, WHERE APPROPRIATE, TO AN APPROVED METHOD STATEMENT. CONTRACTOR TO BE AWARE OF RISKS IDENTIFIED IN THE RESIDUAL RISK REGISTER.

DRAFT COPY

WORK IN PROGRESS

NOT FOR CONSTRUCTION