Review of Segro DCO Documentation relating to Ecology

The following documents have been reviewed to confirm all data are now present and to confirm requests for more data or clarification of data required by consultees have been addressed. Critical comments in RED.

Summaries of reports are presented to aid understanding. Read the Overall Summary and for the more detailed review continue to the summary of each Ecology document.

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Overall Summary

1.Comments on the quality of the reports

Improvements to the Ecology reports were requested in the preliminary response to Segro but these have only been minimally addressed. None of the reports are hyperlinked and there are no lists of acronyms. (Why is hyperlinking not obligatory in large submissions, as this, to government bodies when such requirements have been in place for over 20 years for other industries?).

Apart from the excellent APP-112 DCO 6.9E Environmental Statement Appendix E Invertebrate Report, none of the Ecology reports have an adequate and comprehensive Contents List to facilitate quick location of referenced pages/information. Contents List are now included for all documents but these fail to give page numbers for any Figures, Tables or Appendices found later in the documentation.

Redaction of some texts does not appear appropriate as it clouds any understanding of the report. Redaction is complete for badgers; some texts for bats and birds; too much for otters and water voles so only concluding statements are visible (although it is stated the requirements in this report were agreed with the County Ecologist); plus great crested newts (GCN) along with maps. The reason for redaction of text beyond that giving locations is questionable.

The Invertebrate Report has a very helpful accurate Synopsis at the beginning and is an excellent example of how to present a quality, believably researched, scientific report.

APP-112 Page 7 - Map 2. EMG2 Works survey compartments gives the best summary description of the habitat types and their location within all the Ecology reports.

2. Comments on Ecology issues for the DCO process.

This proposed development is identified as impacting mammals (badgers, otters and water voles are discussed but there is no information regarding lagomorphs, hares in particular, foxes plus smaller species - rodents, hedgehogs etc), birds are included through loss of nesting and feeding areas, plus amphibians (frogs, toads and newts including GCNs). Many species are impacted not only by pond loss but also loss of surrounding areas. The effect of removal of Veteran trees and the impact on saproxylic invertebrates is the major concern identified in the Ecology Reports. The loss of these substrates will also affect the undocumented Fungi, Moss and Lichen populations. Mitigation for Diseworth is essential to prevent breakdown of key food chains impacting on ecosystems.

The Invertebrate Report states 'it is essential that the saproxylic invertebrate assemblage associated with the trees is accounted for in any mitigation for the proposed development.'

The most useful report is APP-112 relating to rare saproxylic invertebrates (beetles) found amongst veteran/ancient/decaying trees. The compounded threat of the Isley Woodhouse development further adds to the isolation of species linked to veteran trees. The Forestry

Commission is involved in mitigation requirements for these trees. Other species will also be affected by loss of food and shelter. It is vital that the combined threats from this Segro development along with all other local development proposals, such as that for Isley Woodhouse, are assessed together to understand the overall impact on our area's biodiversity.

Re potential invertebrate losses, it is known that surveys of veteran trees in our locality have been limited (Bat, GCN, Bird and Badger declines get greater media prominence.)

The loss of farmland described in APP-108 is not minor for farmland birds when all the ongoing applications for development around Diseworth are considered. The cumulative impact is relevant. Mitigation for Skylarks is proposed but new sites for relocation within our local area are shrinking with all the compounding development proposals. Their cheery spring sounds could be lost for Diseworth residents.

It is noted that licences for Great Crested Newts have been granted.

Up to date survey reports for bats are required if time is taken before approval and commencement of any work. Out of date bat reports must be repeated and assessed before any work commences.

Any demands by e.g. Airport Safeguarding for e.g. removal of benches within the Community Park to prevent/reduce bird strike risks need to consider the impact such changes might make to the intended functions and benefits of the Community Park for Diseworth. Mitigation must not be diluted.

3. Comments on why Ecology Reports must be considered to ensure adequate mitigation.

The Landscape and Ecological Management Plan (LEMP), as a requirement of the DCO, states,

The DCO Scheme contributes aspirations and targets of the Leicester, Leicestershire and Rutland Biodiversity Action Plan (BAP), in particular open land with low intensity management. Any divergence from this action plan must be justified.

It is stated that this is to be achieved by **creating** the Community Park to the west of the EMG2 Main Site, and **supplementing** existing habitats following Hyam's Lane and Long Holden.

However, the Ecology Reports from the various developers (EMIA and Prologis plus Isley Woodhouse) must be considered together to give a **full** impression of the cumulative effect of all such developments on Diseworth and its ecosystems and the time required to mitigate such changes.

Review of Individual Ecology Reports

APP-108 DCO 6.9A Environmental Statement Appendix A Preliminary Ecological Appraisal

This document now has a Contents List/Index but no hyperlinking which means it is impossible to quickly check facts quoted in other documents. The lack of hyperlinking was pointed out in the earlier review.

There is no List of Acronyms as previously requested.

The report lists relevant legislation. Records from a desk study are for Leicestershire, Nottinghamshire and Derbyshire going back 20 years were checked and are relevant due to Diseworth's positioning near the junction of the three counties.

The document is very difficult for a lay person to assess as so much is redacted. It includes the expected redaction of texts re badgers, bats, otter and water voles, some maps presumably relating to the aforementioned species locations and Appendix A Records of Protected/Notable Species.

There may be some consternation regarding worker protection while on site when it is realised there is a considerable quantity of the biennial, HEMLOCK, along with similar looking other Apiaceae (which are mentioned) growing on the verge up Hyam's Lane. It may have been recorded but the text is redacted. There appeared to be no warning statement relating to precautions to be taken during site clearance. The failure to observe such a tall umbellifer raises the question as to whether the floral recordings in the reports are adequate.

A site location plan is finally found on page 57 but with no complete index it takes time to locate. The maps which are visible would be impossible for anyone with a degree of colour blindness to interpret. They are very cluttered and the various urban locations are not marked so you need to know the local area.

The number of veteran trees mentioned relating to Lockington Park detailed under 9.5.75 may have been underestimated and there are likely more than the stated number of trees (3 mentioned) so this may be a site of higher value which will be impacted. The major risk identified relates to saproxylic invertebrates found in ancient and veteran trees. Any site loss increases the risk of species isolation.

Donington Park as a site of biodiversity is glossed over and the compounded threat of the Isley Woodhouse development further adds to the isolation of species linked to veteran trees. The Forestry Commission is involved giving advice on mitigation for the loss of veteran trees. A review of the Veteran Trees Inventory from the Woodland Trust might help to give a better understanding and verification of the impact of all the potential developments around Diseworth on such trees with their associated flora and fauna.

Towards the end of the report it correctly states the loss of arable land across the local area will remove potential habitat for farmland birds but assesses the impact is minor because of

the abundance of farmland in the area. This statement is questionable as this loss of farmland is not minor when all the ongoing applications for development around Diseworth are considered. The cumulative impact is relevant here.

APP-109 DCO 6.9B Environmental Statement Appendix B CONFIDENTIAL Badger Report

Cannot be reviewed. This document contains confidential information and is only available on request to those who have a legitimate need to view it.

Badgers are certainly present around Diseworth as evidenced by their digging activities and the roadkill losses. Mitigation is required to address their expected habitat loss. Increased road traffic and on-site nighttime activities from the proposed development are likely to further impact the attractiveness of the area for this predominantly nocturnal species.

APP-110 DCO 6.9C Environmental Statement Appendix C Bat Report

Limited contents list with no page number references for Tables, Figures and Appendices. No hyperlinking. These improvements were requested in the earlier review.

This report has text redacted which might permit learning exact locations of bat species and as a result some sections are more difficult to follow since more text than that identifying locations is blanked out. This redaction clouds proper understanding and verification of the report by lay personnel.

Defines legislation relevant to bats. Bat records were searched for at a resolution of 2km around the EMG2 Project Order Limits and were limited to records from within the last 20 years. Field studies looking at suitability of trees for bats was assessed with aerial surveys completed where possible. Even one description category is redacted. Text relating to nocturnal tree assessments and dates are mostly redacted. Habitat suitability was assessed using current guidelines. Walkover surveys and static monitoring with dates and a discussion of limitations of the survey findings are presented.

Note: Reference is made to Prologis' application where access to land was denied. The Tyler Grange 2024 report included emergence surveys on several trees which resulted in no notable changes to the status of the trees surveyed in this area by FPCR in 2022.

Bat roosts are transient so, if the trees have not been removed within 12 months from the last survey update, additional surveys are needed to confirm that bats have not begun using the features present. If a roost is found, an European Protected Species Licence (EPSL) application is needed to enable the tree removal.

The report states species making up the bulk of the activity are common and widespread generalists. They will continue to use the site in a modified manner once the development is complete, however, there should be further comment relating to timespan for completion and consideration of where evicted species might find locations in the interim.

Mitigation - The report concludes although the field compartments and most internal hedgerows will be lost, the most boundary features will be retained leaving green corridors

which, with landscape buffers, will allow bats to enter the development area and continue utilising the area for foraging and commuting. Disturbance will be minimised (see lighting strategy but what about noise disturbance and earth movements?). Retained hedgerows will be managed for biodiversity and allowed to develop in height and width. This along with improved green infrastructure will benefit bats. Timelines? Additional habitat for insects will increase prey items available to foraging bat species. Mitigation includes provision of bat boxes but why would they occupy these if many food sources have been removed? The report concludes that provided the recommendations report are followed and occupants of the 'sheds' comply with these, the impact on bats will be minor and recoverable.

APP-111 DCO 6.9D Environmental Statement Appendix D Bird Report

Contents lists is insufficiently detailed to identify locations such as the main results (from page 9) and evaluation headings (which start on Page 18) with no page number referencing to Tables, Figures and Appendices and no hyperlinking making cross referencing to documents mentioned within the report text difficult and tiresome to locate. There doesn't appear to be an overall conclusion/evaluation.

It includes both a Breeding Bird (3 visits) and Wintering Bird (2 visits) survey. The latter is an addition to results presented in the earlier consultation. It defines bird protection legislation and the status of bird species with respect to rarity and declining numbers. Desk and field studies are included.

Access to a section of the EMG2 Main Site was denied so detailed update surveys for birds could only use telescopes in this area. However, the documentation for Prologis's planning is referenced so gives additional information on breeding birds present and their respective breeding statuses.

Five surveys from dawn to 11am in May through to mid-July and one dusk survey in June following appropriate guidelines. The winter survey ran monthly from November to February inclusive.

Natural England requested that Attenborough Gravel Pits SSSI, was also considered due to potential for hydrological connection. The report argues the habitats present within the Site are of negligible suitability for any waterbirds given the small and isolated nature of the waterbodies lacking any typical emergent or aquatic vegetation.

None of the 80 non-statutory sites of local conservation importance within 1km of EMG2 received their designations on the basis of the populations and/or assemblages of birds.

The desk study showed 802 records relating to 58 species within 1km of EMG2 and/or located within one or more monads overlapping the Order Limits. Of these, 52 species have legislative protection and/or are considered of national conservation concern (BoCC Red or Amber Listed).

Figures 2 and 3 presumably identifying possible breeding site locations are redacted.

APP-112 DCO 6.9E Environmental Statement Appendix E Invertebrate Report

This is the best report in the Ecology Section. Some text has been copied and summarised from the report because of its importance and to allow for comments and questions.

It has a clear Executive Summary at the beginning giving a credible synopsis of findings. It states 32 Nationally Scarce invertebrate species and 4 Red Data Book or Nationally Rare species were identified within the total surveyed area. The proposals for mitigation within this report must happen and be accurately followed.

There is a good contents list allowing easy access to e.g. numbered appendices when quoted within the text. The only criticism is that it is not hyperlinked.

The EMG2 Main Site and Community Park produced 1807 records of 730 invertebrate species. 25 (3.4%) have formal national conservation status: 23 Nationally Scarce, 2 Nationally Rare/ Red Data Book.

Of the habitats within the above site, mature and overmature trees, predominantly Ash, are present in this site. They have numerous and diverse dead wood and decay features that support a saproxylic invertebrate fauna **of very high local importance**.

Mitigation for habitat loss from the EMG2 Main Site is largely proposed for within the Community Park area to include:

- Conversion of arable to neutral grassland with a cutting regime to encourage herbaceous vegetation and an open-structured sward;
- planting of species-rich hedges to break up larger fields;
- creation of small patches of scrub within grasslands through planting or, preferably, natural succession and planting of scattered low-density Oak along hedges and within fields to encourage open grown parkland trees.
- Dead and decaying wood from trees being removed in site should be translocated in as large pieces as possible to mitigation areas and installed in clusters close to existing mature Ash trees in a range of conditions., e.g. standing trunks, propped/attached aerial large-diameter dead wood, scattered and piled dead wood at tree bases.

Page 7 - Map 2. EMG2 Works survey compartments gives the best summary description of the habitat types and their location within all the Ecology reports.

This report also gives an accurate description of the tree, hedgerow and grassy area species identified while surveying between early June and October. (See previous comments under App-108 regarding HEMLOCK.) The report clearly describes the methodology employed and discusses its limitations. It identifies possible later than ideal surveying times and the impact of the very wet winter and spring of 2024. It seems likely that any invertebrate survey in 2024 might underestimate interest compared to what would have been found on a more average year.

The impact of survey work starting later than ideal, beginning in early June, is assessed. Invertebrate species from the active period of spring and early summer will have been missed. Likely seasonal omissions and the impact of weather conditions are described.

All survey work was diurnal. No nocturnal survey or moth trapping was carried out so any primarily nocturnal species are likely to have been missed.

During the survey of the EMG2 Works, 42 species of qualifying saproxylic Coleoptera were recorded; 11 (26.2%) were Nationally Scarce and have a formal conservation status. The expert concludes this represents the most significant concentration of species with a formal conservation status within the EMG2 Works and highlights the importance of the over-mature trees and their associated wood-decay features.

EMG2 as a whole achieves a Saproxylic Quality Score (SQI) of 364.3. and an Index of Ecological Continuity (IEC) score of 12. EMG2's score (see report Table 5) is not far below the nearby old parkland SSSI site of Donington Park (SQI 377.5) so EMG2 as a whole is of high local importance for its invertebrate fauna, based almost entirely on the saproxylic beetles associated with wood decay habitats.

Steps for mitigation to improve invertebrate fauna are defined. Our assessment of the recommendations made by this invertebrate expert are that they would be expected to benefit many other species in view of the importance of invertebrates towards the base of the food chain pyramid and the impact of their potential loss on the wider ecosystem is yet to be fully understood.

The report states that the overmature trees and their extensive associated wood decay habitats are, by a wide margin, the single most valuable and irreplaceable identified feature of EMG2 for invertebrates but are also the most challenging habitat to mitigate for any loss, damage or disturbance. It is essential that the saproxylic invertebrate assemblage associated with the trees is accounted for in any mitigation for the proposed development. The expert's caveat to any further mitigation advice is the need to avoid any disturbance wherever possible. How will this be achieved? The loss of these old trees and their associated habitat niches can never be entirely mitigated and he explains why.

APP-113 DCO 6.9F Environmental Statement Appendix F Otter and Water Vole Report

The main objective of this assessment was to establish levels of activity across the site to confirm potential impacts and mitigation required.

This report cannot be reviewed properly due to too much redaction of texts relating to methodology. The reason for redaction of text beyond that giving locations is questionable. No actual results are visible other than concluding statements – surely results can be presented without revealing locations.

The report quotes legislation relevant to these mammals. It incorporates a desk study reviewing recordings in Derbyshire, Leicestershire and Nottinghamshire although for how

long is not quoted. Field studies were conducted in 2022 and updated in 2024 with no noticeable difference in results. It is stated that studies were agreed with the County Ecologist.

The conclusion was that removal of ditches D1 and D2 will not be impacted by the EMG2 development as no evidence of water voles or otters was found. The Diseworth Brook Tributary is offsite so will not be directly impacted. Mitigation proposals are claimed to enhance the riparian zone through additional planting and a reduction in land under agricultural use. Additional planting will help but how can replacing an agricultural/ green site with warehousing be advantageous?

Mitigation - An artificial log otter holt is to be constructed providing sheltering opportunities for otter through the construction phase and beyond.

APP-114 DCO 6.9G Environmental Statement Appendix G Reptile Report

A very short report so no issues reviewing.

Habitats within the EMG2 Main Site and Community Park were considered to provide some potential for occupation by reptile species. None were recorded during the 2022 & 2024 surveys. The proposed mitigation will provide suitable reptile habitats.

APP-115 DCO 6.9H Environmental Statement Appendix H Shadow Habitats Regulation Assessment sHRA

No issues with this report as there are only a couple of Tables, Figures or Appendices to find.

This updated version of the Shadow Habitats Regulations Assessment (sHRA) supersedes the original assessment submitted at the statutory consultation stage. The revisions are in response to comments from the Planning Inspectorate.

The Stage 1 screening assessment concludes that, given the substantial distance between the Project and the River Mease SAC, the fact that the Project lies entirely outside of the SAC's operational catchment, and the nature of the development proposals, there are no viable pathways by which the project could give rise to Likely Significant Effects (LSE) on the SAC or its qualifying features.

This is confirmed by Natural England, whose consultation response (dated 15 January 2025) agrees that the proposed development poses no risk and is included in Appendix 1.

APP-116 DCO 6.9I Environmental Statement Appendix I Biodiversity Net Gain

Again no proper contents list as page references for Tables, Figures and Appendices are just listed without a page number. No hyperlinking.

Mandatory BNG has not been brought into force for DCO/NSIP applications (expected May 2026) but a BNG assessment as a voluntary measure in compliance with the published rules for non-NSIP projects is presented. BNG must be demanded if enforcement becomes in place.

APP-117 DCO 6.9J Environmental Statement Appendix J LEMP

The Landscape and Ecological Management Plan (LEMP), a requirement of the DCO, has been written by FPCR Environment and Design Ltd. It claims to 'provide a conservation-led plan of objectives and management prescriptions to be undertaken within the strategic on-site Green Infrastructure (GI) covering landscape, habitats and planting within the DCO Scheme.'

N.B. Much of the retained habitats fall within the control of National Highways so are not within this document's scope.

The document is summarised to allow for incorporation of questions relating to its aims and objectives.

This document's 3 goals are:

- to ameliorative (e.g. to screen views from sensitive receptors);
- to mitigate/compensate (e.g. to provide alternative habitat for displaced species);
- to provide enhancement (e.g. providing greater habitat connectivity, securing management of sensitive existing or proposed habitat, providing a BNG).

The document defines the first 30-years post development completion (for both the construction and initial habitat creation works). It describes scheduled inspection, monitoring and review of all management operations.

It cross references, without hyperlinking, management measures to minimise effects prior to and during construction (see Construction Environmental Management Plan SEGRO – August 2025) and relevant baseline condition information on the EMG2 Project in ES Chapters 9:Ecology and Biodiversity for retained features of ecological interest plus Chapter 10: Landscape and Visual.

The document quotes legislation relating to protected species & defines responsibilities during the construction & subsequent phases out to 30 years. What happens after 30 years? Can this ever be changed? Diseworth would wish to point out the recent approval of solar panels at MOTO after 25 years on land designated to be a future Local Wildlife Site and a condition of the original planning approval. If the DCO is approved, will the Community Park be granted to Diseworth in perpetuity and who will be responsible for its maintenance post 30 years?

This report describes the management plan to avoid or minimise impacts on fauna as:

• Creation of a range of habitats with tailored planting schemes to support local species foraging, commuting and breeding. It is stated green space will include planting fruit and nut-bearing species where appropriate. Some fruit bearing trees are required to maintain diversity despite expected comments from Airport Safeguarding.

• Sensitive design and maintenance of green infrastructure to buffer specific ecological features.

• Maintenance of sensitive lighting strategy during operational phase;

• Incorporation of a range of species-specific mitigation features (bat and bird boxes with specified timing for introduction, otter holt, insect banks, bat hop-overs).

• Re-use of material from veteran trees to create alternative standing dead wood resources.

• Enhancing boundary features within the EMG2 Main Site to maintain habitat connectivity to the surrounding area for fauna, including badgers, bats and otters.

• Sensitive timing of works in relation to faunal cycles (avoid vegetation clearance during bird nesting season).

The objectives set out focus on effective management of all retained semi-natural and newly created habitats. The LEMP will also ensure that the DCO Scheme contributes aspirations and targets of the Leicester, Leicestershire and Rutland Biodiversity Action Plan (BAP), in particular open land with low intensity management. Who is monitoring this?

Proposals aim to increase public access to the peripheral Green Infrastructure, in particular through the Community Park, by creating new pedestrian routes and bridleways through the main site. The aim is to provide BNG by establishing complementary native habitats with a species-rich mosaic of habitats to enhance floral biodiversity and support a wide range of local fauna throughout the site to include that displaced during built area development.

This will primarily be achieved by creating the Community Park to the west of the EMG2 Main Site, and supplementing existing habitats following Hyam's Lane and Long Holden. Sustainable access routes will be created. The aims are to:

• Ensure a range of habitats for a range of breeding and overwintering birds. This involves placing of tree mounted boxes prior to tree removal commencement; noise and disturbance Integrated Swift boxes on buildings. Will these be obligatory for building tenants?; and grassland management to support Skylarks and Yellow Wagtails. Will the latter have restricted access to avoid nest disturbance?

• Provide alternative foraging and roosting habitat for bats by positioning bat boxes in retained trees prior to work commencement.

• Enhance foraging habitat for other mammal species in the locality including badger, hedgehog and otter. The following are proposed: two new artificial badger setts; new hibernation and refuge features in association with new and existing ponds / SuDS features; plus an otter holt, in association with the Diseworth brook tributary.

• Provide a range of habitats for invertebrates, particularly for saproxylic species assemblages associated with dead wood. (see Invertebrates report).

Will each of the above be within an adequate area to meet the aims and can they be suitably separated, where required, to allow/limit access e.g. areas designated for ground nesting bird species such as skylarks and lapwings or inhabiting mammals e.g. hares and other species where disturbance by e.g. humans or dogs would deter colonisation?

Does the Community Park have room for children to play and for people to sit peacefully? and enjoy the new surroundings? How long will it be before this is established?

Aftercare and management plans of new works to ensure the development of objectives for each habitat are met are defined at 1-5 years, 5-10 years and 10-30 years after which no plan and defined responsibility is stated. What happens post 30 years? Who is responsible for monitoring to ensure the work is conducted to plan? Will the annual site monitoring by a suitably qualified ecologist be sufficient to identify deviation from planned objectives if fuller surveys do not occur until year 5?

Maintenance procedures for timing of cutting, with appraisal and any necessary adjustment of management plans for habitats are described. Procedures for veteran (particularly ecologically high value trees), existing and newly planted tree management are defined.

No ash trees will be planted as per SI 2707 – The Plant Health (Forestry) (Amendment) Order 2012 but planting ratios can include extra open space to allow for natural colonisation by ash seedlings.

Mitigation will aim to go beyond the standard provision of habitats to further increase the value of the EMG2 Main Site and Community Park for invertebrates. Should read, 'Must.'

Table 4 lists the work schedule timetable for planting, establishing and management.

Separate veteran tree strategy is described in Appendix B.

Mitigation for the loss of trees, (including the 9 veterans Ash but with 7 retained), aims to consider the wider woodland resource.

• Avoid tree loss where feasible through site design;

• Minimise impacts of tree loss on associated faunal assemblages by re-using the dead wood arisings within site designs;

• Enhance retained trees through improved management and buffering;

• Create new habitats and improve connectivity through woodland, scrub and orchard planting.

APP-118 DCO 6.9K Environmental Statement Appendix K Bird Strike Hazard Management Plan

This document appends APPENDIX A: CAP772 – BIRDSTRIKE RISK MANAGEMENT FOR AERODROMES Civil Aviation Authority 1st September 2008 and follows its guidelines.

It would have been helpful if the maps provided included one superimposing the flight paths over or in close proximity to the identified risk site.

The risk assessment from the full report appears to be an appropriately balanced review of whether the proposed developments will affect the risk of bird strikes. All relevant birds identified as possibly creating a strike risk have been assessed individually both currently and as predicted for the future during and post development. There is no increased risk and for the majority of species, the risk will be reduced.

The flat roof areas pose the main risk. Design and maintenance will be as required under CAP 772 and 738. This is Segro's responsibility but any changes in building design proposals must be monitored and limited to ensure they do not increase the visual impact/reduce screening proposals for Diseworth.

Currently, the EMG2 Main Site and Community Park habitats are mainly arable fields with hedgerows and are of limited value to most priority species/groups due to the lack of any significant open water habitats. The arable farmland loss will further reduce the attraction of the site for hazardous species.

N.B. The nearest open water habitats are the pond within the grounds of MOTO and one of EMA's balancing ponds which is nearer to the airport runway than the DCO site. The report map shows there are no significant areas of waterbodies or woodland within the site.

It is stated, 'A new pond is to be created as far from the airport as possible and an orchard to the north of the site will be planted using only a mix of nut-bearing species to restrict attractiveness to thrushes. Before imposing such restrictions on these areas further from the runway, EMA should be asked to look to their own existing plantings and claims made about the benefits of the Airport Trail. Restrictions need to be reviewed to prevent a decline in the stated benefits to Diseworth of the Country Park. A monoculture of Hazel + ?? (Walnut is not native) native species will not increase biodiversity greatly and cannot be described as an 'Orchard'.

In relation to the risk from temporary standing water and exposed soils during construction, the latter have been turned over for years by Diseworth farmers so should present no change in risk.

The management plan will apply to the site in perpetuity and be transferred to any new responsible body in the event of a change of ownership. Threshold levels of bird numbers above which control measures may be required are listed within the report.

APP-119 DCO 6.9L Environmental Statement Appendix L Protected Species Licences and LONIs

Natural England has responded and reviewed the documentation submitted to them in relation to badgers, bats and GCNs. The licence for GCNs is granted and paid for.

Re Badgers - Unable to check whether the requested changes to the texts etc have been made because of the redaction of these reports.

Re Bats. Natural England in their letter states 'Section B3(a) – The formal application should include the two alternatives discussed (retention of the tree and construction of a bridge over Hyam's Lane) within the table rather than under the 'Not Applicable to Situation' header.' Unfortunately, due to redactions, it is not possible to follow what is meant here!