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Pre-commencement Mammal Survey

Ickleford Mill, Herts

Site	Ickleford Mill, Herts
Project number	184025
Client name / Address	The Hill Group, The Power House, Gunpowder Mill, Powdermill Lane, Waltham Abbey, Essex, EN9 1B

Version number	Date of issue	Revisions
2.0	5 December 2025	Original
3.0	14 July 2026	Amendments incorporated following updated survey prior to demolition

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Declaration of compliance

The information which we have provided is true and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's (CIEEM) Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions.



MKA Ecology Ltd is a CIEEM Registered Practice. This means that MKA Ecology Ltd are formally recognised for high professional standards, working at the forefront of our profession.

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1. INTRODUCTION

In July 2026 MKA Ecology Ltd was commissioned to undertake a pre-commencement mammal walkover of the site at Ickleford Mill, Herts in order to inform the demolition process. A dedicated mammal walkover survey was undertaken on the 2 July 2026, by MKA Ecology Ltd.

1.1. Aims and objectives

This report has been prepared to provide guidance on the status of protected and notable species present onsite and the appropriate management techniques to ensure the protection of biodiversity features and compliance with wildlife legislation during the proposed construction works at Ickleford Mill, Herts. The document is designed to discharge Condition 36 of the Outline Planning Consent 17/01955/1, as issued by Nott Herts Council, which reads:

“Condition 36: “Within a month prior to commencement of the development (including clearance work), a mammal walk-over survey of the site and 30m of adjacent land (access permitting) shall be carried out by a suitably qualified and experienced ecologist to check for the presence of further active badger setts, otter holts and water vole holes/ feeding stations and if protected mammals will be impacted by the development proposals, appropriate mitigation to safeguard them must be submitted to the Local Planning Authority for approval. A licence may be required from Natural England to proceed lawfully. In the absence of the requirement for a licence any recommended non licensable mitigation should be carried out in full.

Reason: in the interests of wildlife protection and in accordance with Conservation of Habitats and Species Regulations 2017.”

Badger and otter activity can change quickly over time, and there is a low risk that activity levels for these species will have increased on Site prior to the demolition works commencing. Therefore, a pre-commencement mammal walkover was undertaken to confirm if any new badger setts or otter holts had been created prior to demolition works commencing.

The aims of the survey were to record all evidence of mammal activity identified within the survey area. The purpose of this report is to detail the results and conclusions of the survey and provide precautionary measures in relation to all mammals and nesting birds identified onsite to ensure that ecological features are protected during the demolition period, and, where impacts are anticipated, to apply appropriate measures to minimise these. In this report, the survey area is referred to as ‘the Site’ or Ickleford Mill.

1.2. Site description

The Site comprises a decommissioned flour mill and associated factory and office buildings covering approximately 3.59 hectares. The Site is fenced on all perimeters, with the River Oughton running in a west to east direction through the centre. To the south of the River Oughton is an area of grassland with mature hedgerows and trees. The development boundary is shown in Figure 1.

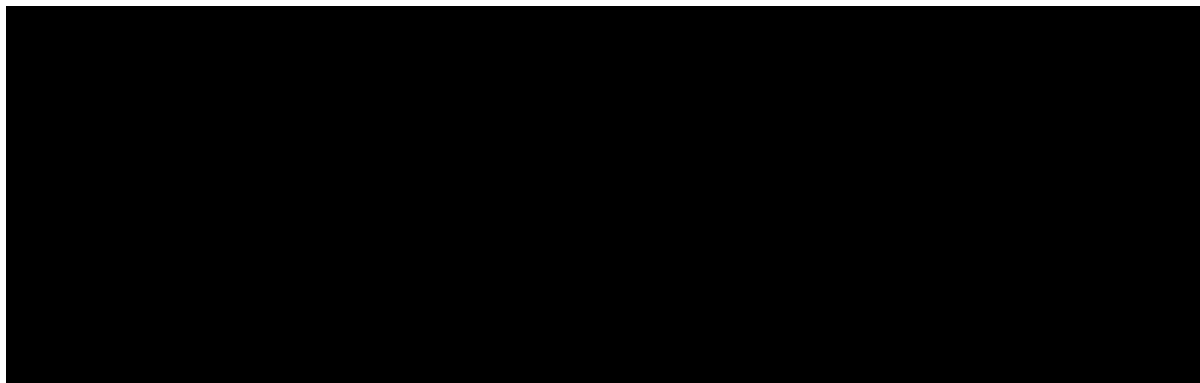
1.3. Management Responsibility

Adherence to this document during the development works at Ickleford Mill, Herts, will be the responsibility of the allocated onsite contractors during the demolition works. It is recommended that precautionary measures outlined within this document are included within the Demolition and Construction Management Plan (DCMP).

1.4. Background and existing site ecology

The Site consists of a decommissioned flour mill and associated factory and office buildings. The River Oughton runs in a west to east direction through the centre of the Site and grassland, woodland and lines of trees are present to the south of the river. The proposed development will involve the demolition of all onsite buildings and the construction of 55 new residential dwellings with associated hardstanding and garden habitats. The area onsite to the south of the River Oughton is designated as Green Belt and will not be developed on, instead being used to provide public open space.

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- **Otter and water vole:** Evidence of otter was also recorded within the Site, including three separate feeding stations. Incidental records of individual otters were recorded during bat surveys in September 2022. No evidence of holts was recorded within the Site. No signs of water vole were recorded in 2022. Updated otter and water vole surveys were undertaken in January and April 2026. Otter spraints and a feeding station were recorded during the surveys; however, no otter holts or couches were recorded. No evidence of water vole was recorded during these surveys, habitat along the River Oughton was assessed as suboptimal to unsuitable to support water vole and this species is not considered to be a constraint to the

development. The full results of these surveys are detailed in the Otter and Water Vole Survey report (MKA Ecology Ltd, 2026c).

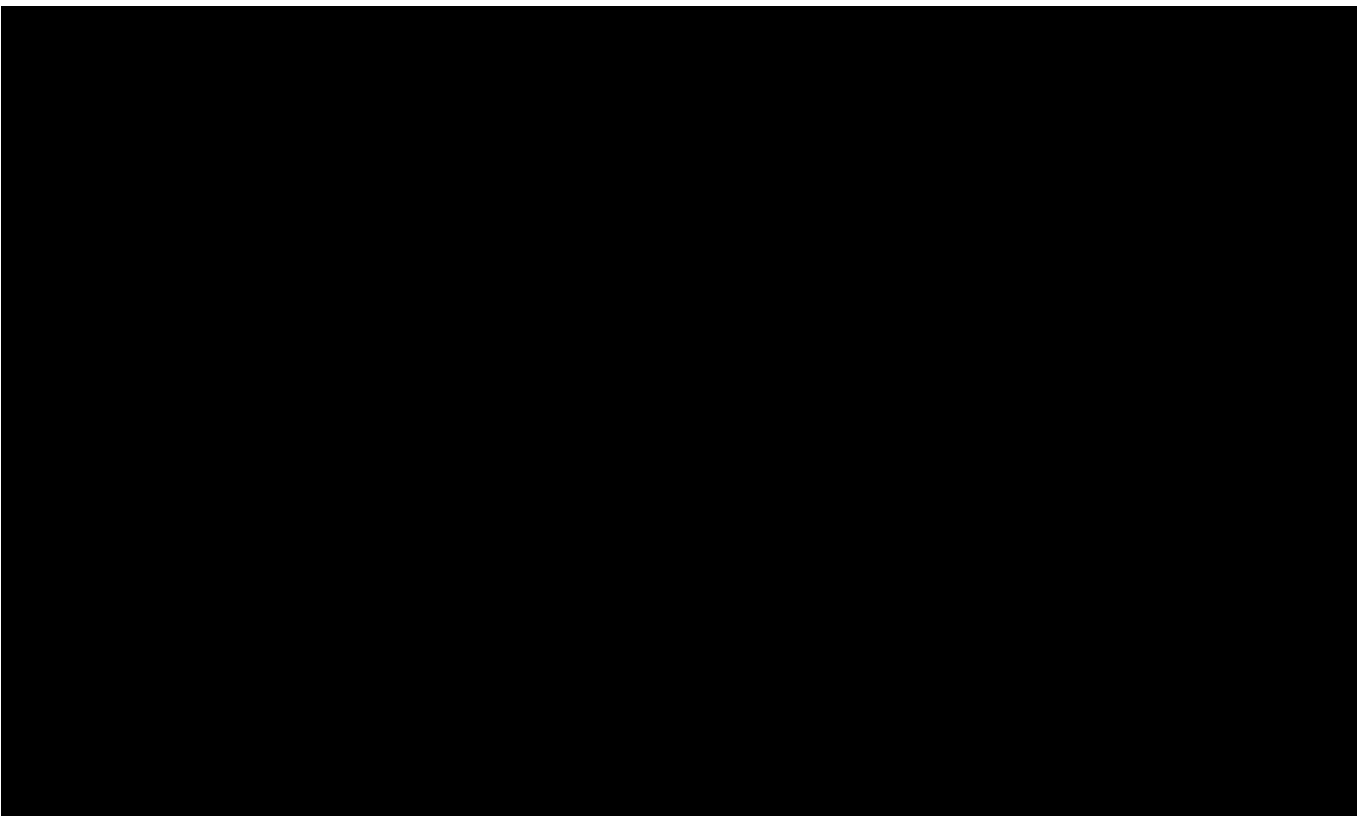
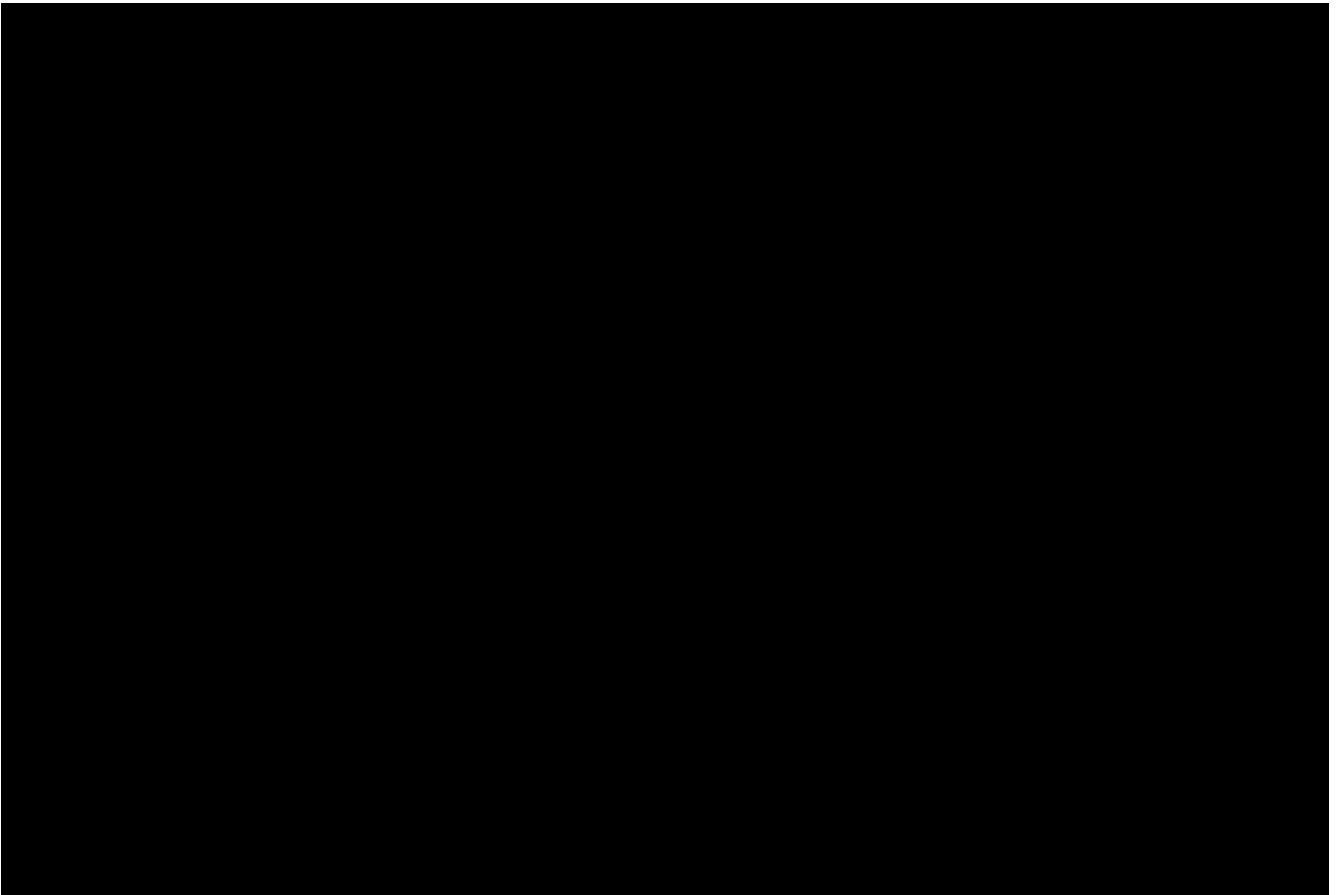
- **Bats:** An updated Preliminary Ecological Appraisal and Preliminary Roost Assessment was undertaken by MKA Ecology Ltd in October 2025a. The survey identified seven buildings onsite as having potential to support roosting bats (building labels and locations shown in Figure 1). One building (B1) was assessed as having moderate bat roost potential, while the remaining six buildings (B2, B12, B16, B34, B41 and B42-43) were assessed as having low bat roost potential. It was recommended that Bat Emergence Surveys be undertaken on all buildings with identified roost potential. Updated bat emergence surveys were undertaken by MKA Ecology Ltd in September - October 2025 and July 2026. The site has been closed since 2016, is vacant, in a derelict and unsafe condition. Due to the poor structural integrity of many of the buildings, it was deemed essential that surveys were conducted as soon as possible to inform the demolition to mitigate the significant health and safety risk posed by leaving these buildings in situ. One common pipistrelle *Pipistrellus pipistrellus* was recorded emerging from Building 41 during one of the Autumn surveys, indicating a likely transitional roost of a small number of bats. Full details of this are reported within the Bat Emergence Report (MKA Ecology Ltd, 2026b).
- **Nesting birds:** A number of trees and vegetation require removal to facilitate the development. These habitats provide nesting opportunities for common bird species. It is recommended that precautionary measures are incorporated to safeguard nesting birds.

1.5. Legislation

This mammal walkover has been undertaken with reference to relevant wildlife legislation (Appendix 1), including:

- The Wildlife and Countryside Act 1981 (as amended);
- The Conservation of Habitats and Species Regulations 2017 (as amended); and
- Protection of Badgers Act 1992.

2. METHODOLOGY



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2.2. Water vole and otter

The River Oughton and nearby terrestrial habitat within the Site was searched for evidence of otter holts, water vole burrows and feeding stations, however, an exhaustive search of the riverbank was not completed during the mammal walkover.

2.3. Survey dates and weather conditions

Details of timings and weather conditions for the survey visit can be found in Table 1 below.

Table 1: Summary of weather conditions

Date	Time of survey	Weather conditions*	
18/09/2025	10:30	Wind: 2 Cloud: 8	Temp: 18°C Rain: 0%
01/10/2025	09:30	Wind: 1 Cloud: 0	Temp: 11°C Rain: 0%
02/07/2026	10:00	Wind: 2/3 Cloud: 4	Temp: 21°C Rain: 0%

*Wind as per Beaufort Scale / Cloud cover given in Oktas.

2.4. Surveyor, author and reviewer

The mammal survey was undertaken by Marielle James MCIEEM, Principal Ecologist and Maddy Grove, Ecologist at MKA Ecology Ltd on the 18 September 2025 and by Tom McGuire, Ecologist at MKA Ecology Ltd on the 1 October 2025. A subsequent mammal walkover was undertaken by Suzanne Dry, Consultant Ecologist at MKA Ecology Ltd on the 2 July 2026. This technical note has been written by Marielle, who has over 10 years' experience as an ecological consultant, Tom has over three years as an ecological consultant, Maddy has two years' experience as an ecological consultant and Suzanne has over five years as an ecological consultant. This technical note has been reviewed by Felix Bird, Senior Ecologist at MKA Ecology Ltd. Felix has seven years' experience as an ecological consultant.

2.5. Constraints

The survey was completed during a suitable period for badger and otter surveys, as surveys for these species can be completed throughout the year, with optimum periods of spring or early autumn/winter.

Due to access restrictions, it was not possible to survey the land outside of the Site's boundaries, and therefore it was not possible to fully inspect Sett 2. However, the full perimeter of the site was inspected, with no evidence of badger recorded and an assumption of activity levels was made on what could be observed through the security fencing.

3. Results

3.1. Mammal walkover

The locations of any observations recorded during the surveys are shown on Figure 1 below. No new badger setts, latrines, dung or foraging signs were recorded during any of the mammal walkover surveys in Autumn 2025 or in July 2026.

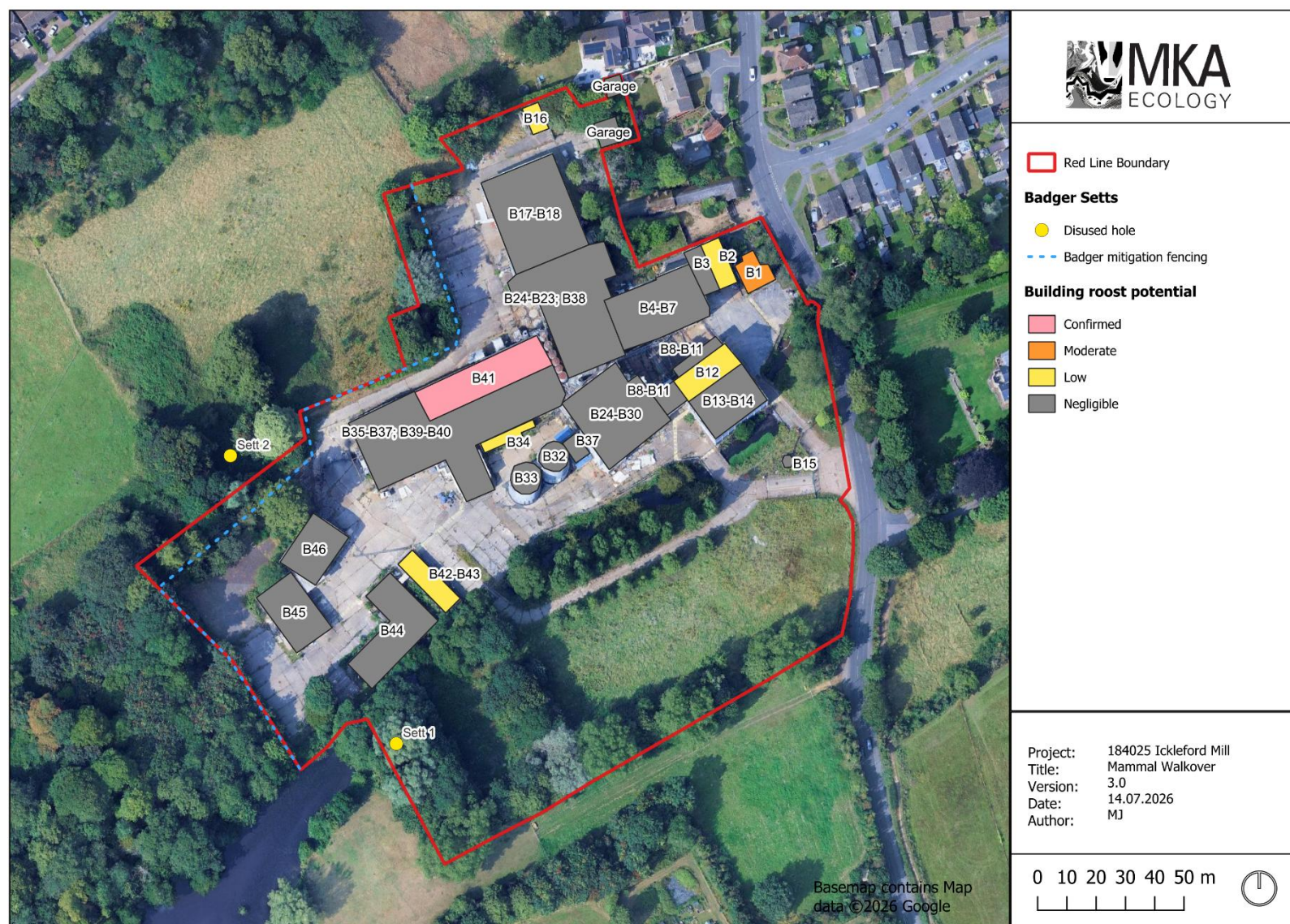
Sett 1 and Sett 2 are both disused outlier setts.

No otter holts or couches were recorded within the surveyed areas of the Site. No signs of water vole were recorded.

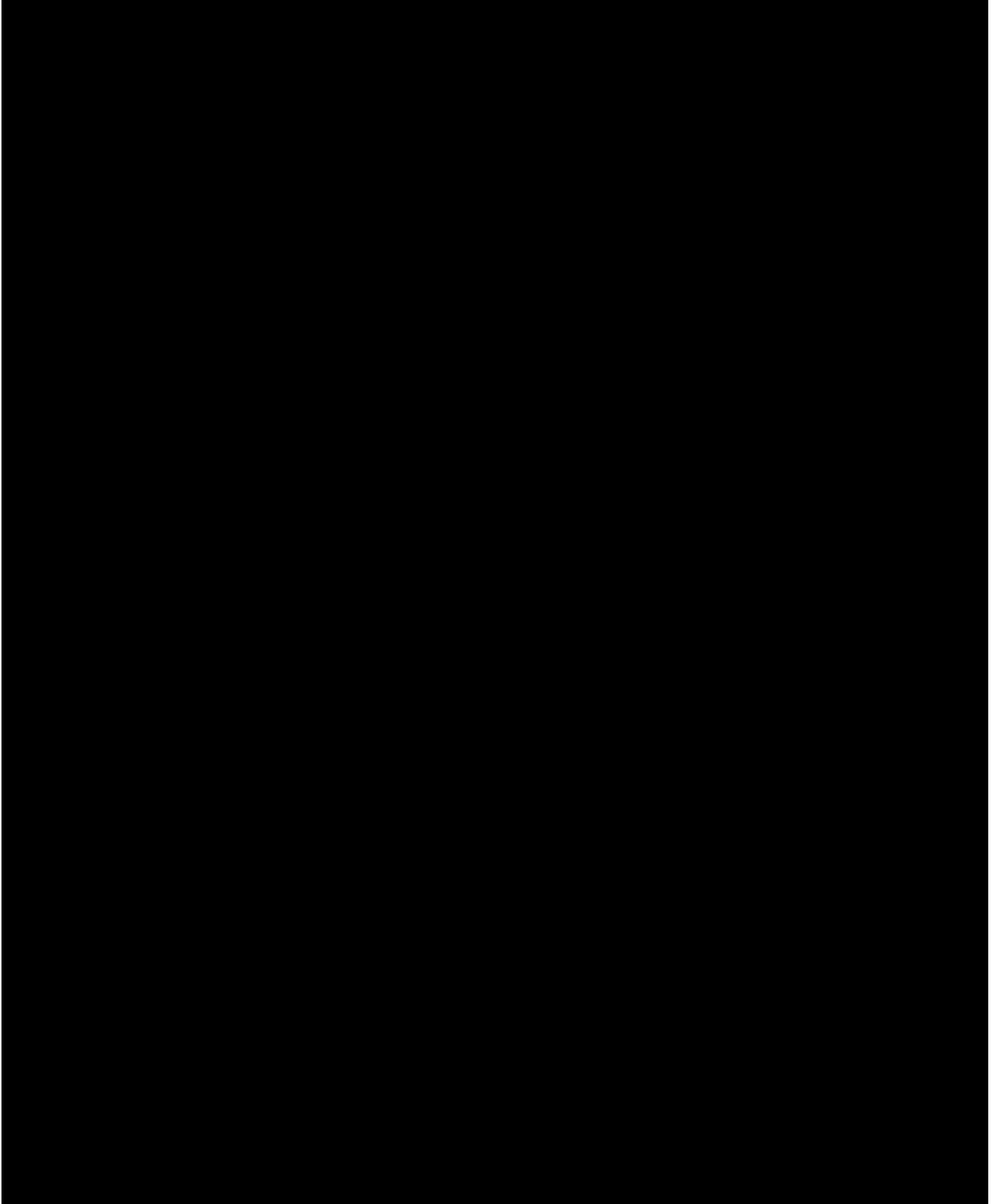
3.2. Bats

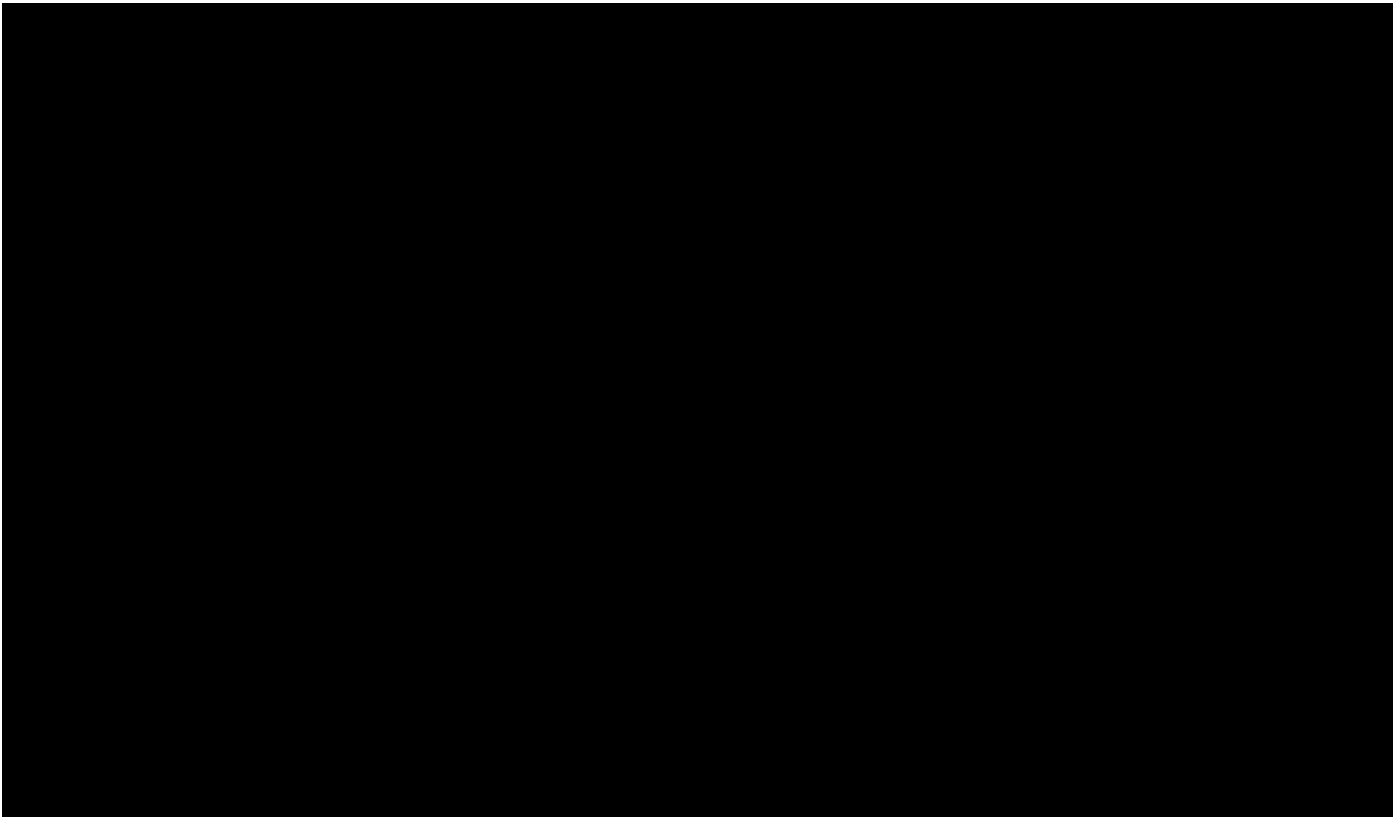
As discussed in Section 2.4; during the Bat Emergence Surveys undertaken in September– and October 2025 and July 2026, one common pipistrelle transitional roost was recorded in Building 41. Six other buildings were identified with potential to support roosting bats during the updated Preliminary Roost Assessment (MKA Ecology Ltd, 2026a); however, no further bat roosts were identified in these buildings during subsequent nocturnal surveys.

Figure 1: Protected or notable species constraints at Ickleford Mill



4. PROTECTION OF ECOLOGICAL FEATURES DURING DEMOLITION





4.2. Otter and water vole

The River Oughton provides good foraging and commuting opportunities for otters and there is suitable habitat on site for otter.

To reduce disturbance, precautionary mitigation measures, outlined below, are recommended to facilitate the demolition and construction works.

- Where feasible, a minimum buffer zone of 10m should be retained from the top of the bank of the watercourse.
- Heavy machinery should be kept away from this exclusion zone.
- Precautionary measures suitable for badger, such as mammal ramps on trenches, will also be beneficial for otters.
- A small number of buildings are located within 10m of the River Oughton, in these instances, it will not be possible to maintain the exclusion distance. Precautionary measures to prevent pollution prevention and damage to the River Oughton, which would also safeguard ecological receptors, must be outlined within the DCMP.
- It is also recommended that no lighting of the River Oughton takes place during the demolition process or construction phase of the development, to maintain this feature as a dark corridor and to minimise disturbance to otter, water vole and other species such as bats.

4.3. Bats

A total of seven buildings onsite were assessed as having potential to support roosting bats (building labels and locations shown in Figure 1). One common pipistrelle bat roost was identified within B41 in 2025.

It will be necessary to obtain a EPSL from Natural England prior to undertaking the demolition works of Building B41. As part of this licence, a method statement will be produced. The EPSL method statement will outline the current state of bat species at the site and describe in detail how this will be maintained through mitigation and compensation.

To reduce overlap between this document and the licence application, this report will outline the mitigation strategy below and is subject to changes following consultation with Natural England during the licence application process. Once the licence has been obtained all works must proceed under the written methodology contained with the EPSL method statement. The licence will ensure that no bats are accidentally killed or injured during works.

To ensure that bats are fully safeguarded throughout the proposed development, the removal of the known roosting features on B41 will follow the working measures outlined below:

The Main Contractor will:

- Ensure initial works to bat roosting sites will be timed so that these do not occur during the hibernation period, November - February (inclusive). It is recommended that works are undertaken between mid-March to the end of October (weather dependent), to minimise the risk of impacting bats;
- Provide support to the Ecological Clerk of Works with regard to access equipment for inspections and/ or exclusion works; and
- Install bat boxes on mature retained trees prior to demolition works.

A suitably experienced and licenced ecologist will act as ECoW. The ECoW will:

- Prior to commencement, brief all contractors associated with the works in a “Toolbox Talk” as to the potential presence of bats, the required methodology to ensure the works to proceed safely; the relevant implications and necessary safeguards;
- Act as the ECoW on Site to oversee the works;
- Install alternative roost boxes in trees on the site in advance of the works;
- Undertake a pre-works inspection of roosting locations;
- Where appropriate, fit exclusion devices for a total of five nights in good weather conditions; and

- Undertake destructive search of roosting locations following exclusion period.

The role of the ECoW is described in further detail in the following section.

4.4. Nesting birds

A number of trees and scrub vegetation need to be removed to facilitate the proposed development. Scheduling vegetation removal works between the months of September and February inclusive (i.e., outside of the bird breeding season) would avoid impacts on breeding birds.

Where vegetation clearance works are required during the breeding bird season (between the months of March and August inclusive), such works can only proceed following the completion of a nesting bird check undertaken by an experienced ornithologist. The check must occur within a maximum of **48 hours** prior to work commencing.

Any active birds' nest identified during this check must be protected from harm until the nesting attempt is complete. This will require a buffer to be left around the nest, the size of which will depend upon the species involved (as a guideline, this will be 10m in all directions around the nest). Any buffers established because of an initial nesting bird check must be subjected to a second check after the original nesting attempt is completed, before such areas can be removed during the breeding bird season (between the months of March and August inclusive).

4.5. Ecological Clerk of Works (ECoW)

The nature and complexity of the ECoW role varies considerably between sites but often involves:

- Supervising the implementation of planning conditions, licences and best practice guidance through the construction and operational phases of developments;
- Ensuring that works on site comply with legislation regarding protected species. Non-compliance with environmental and ecological legislation, licences or consents can result in delays to a project, heavy fines and even custodial sentences in some circumstances. The role of the ECoW can add significant value to a project, not just by avoiding fines and delays, but through enhancing the reputation of clients and their projects through good publicity;
- Providing guidance and advice on how to avoid or minimise on-site ecological impacts through, for example, the design and supervision of ecological mitigation and compensation measures.

Before any work can proceed on site, the ECoW must ensure that any ecological issues have been identified and that adequate protection measures are put into place, as outlined within this document.

The primary roles for the ECoW for Ickleford Mill, will be for, checking precautionary measures have been installed prior to the commencement of the works; following the Bat EPSL Method Statement; and undertaking nesting bird checks if required.

Toolbox talk

The ECoW will provide a brief induction (“Toolbox Talk”) for contractors onsite prior to commencement of works, detailing the contents of this document. All onsite contractors will be made aware of the potential presence of the bat roosts, nesting birds, badger setts at the Site as well as water vole and otter along the River Oughton. A copy of this document should be available onsite at all times.

Any new contractors starting at the Site will be made familiar with the contents of this document before starting any work. Ideally the key messages in this report, will be included within the DCMP and included in the general site induction for new contractors.

The MKA Ecology Ltd head office should be called on 01763 262211 if badger, otter, bat or nesting bird concerns are encountered during any unsupervised works.

Communication

Good communication and close liaison with other contractors, project managers and designers are an essential part of this type of work. The ECoW should not ‘police’ the site or give instruction but must ensure that sensitive ecological issues are identified early and managed according to Best Practice. During site operations that may impact upon the ecology of the site, the ECoW will work closely with site operatives and operators of machinery to provide advice and be at hand in case any issues arise during works.

The ECoW and site manager should agree a procedure of work before any works commence with regard to avoiding harm, damage or destruction to any species and habitats protected by law and/or relevant planning guidance.

Agreements should be put into document form, and all site operatives should be briefed and sign the document to confirm that they agree to adhere to the procedures and methodologies outlined.

Close-down report

Where an ECoW is required, a brief Letter Report summarising the outcome of their actions will be issued to detail the actions that were taken, for submission to the local planning authority at the end of the construction period.

4.6. Construction phase management timings

An indication of the timings for the construction phase management actions to be undertaken is shown in Table 2. These should be used to inform the scheduling of development works at the Site.

Table 2: Construction phase management timings for Ickleford Mill, Herts

Activity	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Vegetation clearance (outside of breeding bird season)												
Vegetation clearance (requiring nesting bird check)												
Badger sett check												
Bat ECoW												
Protection measures and safe working practices regarding badgers and otter												

Key

Optimal timing of works	
Sub-optimal timing of works	

4.7. Construction phase risk assessment and protection measures summary

Table 3: Construction protection measures for Ickleford Mill

Ecological feature	Avoidance measures	Timing	Responsibility
Badger and otter	Mitigation fencing install to safeguard Sett 2 Toolbox talk Appropriate storage of construction material and equipment Pollution mitigation measures Sensitive lighting scheme during works to maintain dark corridor on River Oughton	Throughout demolition / construction period	ECoW and site manager thereafter
Bats	Follow mitigation outlined within the Bat EPSL	During demolition	ECoW and site manager
Nesting Birds	Sensitive timing of works	September to February (inclusive)	ECoW or site manager
	Nesting bird checks	March to August (inclusive)	

5. REFERENCES

Badger Trust (2023) *Badger Protection: Best Practice Guidance for Developers, Ecologists and Planners (England)*. Badger Trust: Brighton.

Dean, M., Strachan, R., Gow, D. and Andrews, R. (2016). *The Water Vole Mitigation Handbook*. (The Mammal Society Mitigation Guidance Series). Eds Fiona Mathews and Pail Chanin. The Mammal Society, London.

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MKA Ecology Ltd (2026b) Bat Emergence Survey. MKA Ecology Ltd: Cambridge.

MKA Ecology Ltd (2026c) Otter and Water Vole Survey. MKA Ecology Ltd. Cambridge

Natural England (2007) *Badgers and Development: Interim Guidance Document*. Natural England: Peterborough.

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6. APPENDICES

6.1. Appendix 1: Relevant wildlife legislation

Subject	Legislation (England)	Relevant prohibited actions
<i>Mammals</i>		
Badger <i>Meles meles</i>	Protection of Badgers Act 1992	Under Section 3 of the Act: • Damage a sett or any part of it; • Destroy a sett; • Obstruct access to, or any entrance of, a sett; or • Disturb a badger when it is occupying a sett. A sett is defined legally as any structure or place which displays signs indicating current use by a badger (Natural England 2007).

Subject	Legislation (England)	Relevant prohibited actions
Bats (all UK species)	Schedule 2 of Conservation of Habitats and Species Regulations (2017) Schedule 5 of Wildlife and Countryside Act 1981 (as amended)	• Deliberately capture, injure or kill a bat; • Deliberately disturb a bat (disturbance is defined as an action which is likely to: (i) Impair their ability to survive, to breed or reproduce, or to rear or nurture their young; (ii) Impair their ability to hibernate or migrate; or (iii) Affect significantly the local distribution or abundance of the species); • Damage or destroy a bat roost; • Intentionally or recklessly disturb a bat at a roost; or • Intentionally or recklessly obstruct access to a roost. In this interpretation, a bat roost is "<i>any structure or place which any wild [bat]...uses for shelter or protection</i>". Legal opinion is that the roost is protected whether or not the bats are present at the time.
Otter <i>Lutra lutra</i>	Schedule 2 of Conservation of Habitats and Species Regulations (2017)	• Deliberately capture, injure or kill an otter; • Deliberately disturb an otter in such a way as to be likely to significantly affect the local distribution or

Subject	Legislation (England)	Relevant prohibited actions
	Section 9(4)(b) and (c) of Schedule 5 of Wildlife and Countryside Act 1981 (as amended)	abundance of otters or the ability of any significant group of otters to survive, breed, rear or nurture their young; • Intentionally or recklessly disturb any otter whilst it is occupying a holt; • Damage or destroy or intentionally or recklessly obstruct access to an otter holt.
Water vole <i>Arvicola amphibius</i>	Section 9 of Schedule 5 of Wildlife and Countryside Act 1981 (as amended)	• Intentionally kill, injure or take water voles; • Possess or control live or dead water voles or derivatives; • Intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection; or • Intentionally or recklessly disturb water voles whilst occupying a structure or place used for that purpose.
Birds		
All wild birds	Wildlife and Countryside Act 1981 (as amended)	• Intentionally kill, injure, or take any wild bird or their eggs or nests.
'Schedule 1' birds	Schedule 1 of the Wildlife and Countryside Act 1981 (as amended)	• Disturb any wild bird listed on Schedule 1 whilst it is building a nest or is in, on, or near a nest containing eggs or young; or • Disturb the dependent young of any wild bird listed on Schedule 1.

Appendix 2: Site photographs

Photograph 1: Sett 1



Photograph 2: River Oughton





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