

Our ref: Hampshire Constabulary Training Site, Netley

RPS-Tetrattech,
Lakesbury House,
Chandlers Ford,
Hampshire,
SO53 5SS

Date: 9th February 2026

Hampshire Constabulary – Precautionary Method of Working (nesting birds, reptiles, amphibians, hedgehogs, badgers and bats)

Introduction

RPS TetraTech were commissioned by Atkins Realis on behalf of The Police and Crime Commissioner for Hampshire and the Isle of White (the Client) to produce a Precautionary Method of Working (PMoW) Statement as recommended by the Ecological Appraisal completed for the site by Hampshire County Council in November 2024 and in line with the Planning Conditions.

Background

The Ecological Appraisal (Hampshire County Council, 2024) concluded that the site provided suitable habitat for birds, reptiles, amphibians (during their terrestrial life stage), hedgehogs, badgers and bats; with suitable foraging and commuting habitat for bats and potential bat roosting features in several trees within the woodland areas onsite. The PMoW will therefore cover the protection measures that must be adhered to during the associated works to prevent impacts to any protected species that may be using the site.

Proposed Works

Current development proposals include the erection of a 3m high steel mesh security fence to site boundaries, with vehicular gates, and widening of access drive from Hamble Lane on land at the Police Training Centre, Royal Victoria Country Park, Netley Abbey, Southampton, SO31 4TS (hereinafter referred to as the site). This will include the clearance of vegetation along the proposed fenceline and the management and maintenance of several trees along the site boundary.

This report herein describes that methodology, to discharge the following conditions of the planning approval notice (REF: F/25/98808), which state:

Condition 4

"Prior to any works which involve removal or disturbance of existing woodland or undergrowth, a Precautionary Working Method Statement to protect nesting birds, reptiles, amphibians, hedgehogs, badgers and bats shall be submitted to and approved in writing by the Local Planning Authority. All works shall be undertaken in accordance with the approved method statement."

Condition 7

"No vegetation clearance shall occur on site during the bird nesting season [between 1st March & 31st August] unless supervised by an appropriately qualified ecologist."

Legislation

Birds

All birds, their nests and eggs are afforded protection under the Wildlife and Countryside Act 1981 (as amended), and as updated by the Countryside and Rights of Way Act 2000. It is an offence to:

- Intentionally kill, injure or take any wild bird;
- Intentionally take, damage or destroy the nest of any wild bird while it is in use or being built; and
- Intentionally take or destroy the egg of any wild bird.

Schedule 1 birds cannot be intentionally or recklessly disturbed when nesting and there are increased penalties for doing so. Licences can be issued to visit the nests of such birds for conservation, scientific or photographic purposes but not to allow disturbance during a development even in circumstances where that development is fully authorised by consents such as valid planning permission.

Reptiles

All common UK reptile species (adder *Vipera berus*, grass snake *Natrix Helvetica*, common lizard *Zootoca vivipara* and slow worm *Anguis fragilis*) are protected through part of Section 9 (1 and 5) of the Wildlife & Countryside Act 1981 (as amended). This prohibits:

- Intentional or reckless injuring or killing;
- Selling, offering or exposing for sale, or having in possession or transporting for the purpose of sale, any live or dead wild animal or any part of, or anything derived from, such an animal; or
- Publishing or causing to be published any advertisement likely to be understood as conveying buying or selling, or intending to buy or sell, any of those things.

Amphibians

Great Crested Newts *Triturus cristatus* are listed on Schedule 5 of the Wildlife and Countryside Act 1981 (and as amended), which affords the species protection under Section 9. The species is also listed on Schedule 2 of the Conservation of Habitats and Species Regulations 2017. In combination, this makes it an offence to:

- intentionally kill, injure or take (capture etc.) a Great Crested Newt;
- possess a Great Crested Newt;
- intentionally or recklessly damage, destroy, obstruct access to any structure or place used by Great Crested Newt for shelter or protection, or disturb any animal occupying such a structure or place; and sell, offer for sale, possess or transport for the purpose of sale (live or dead animal, part or derivative) or advertise for buying or selling such things.

Great Crested Newts are listed as a species of principal importance for biodiversity in England & Wales under Section 41 of the Natural Environment & Rural Communities Act (2006).

Hedgehogs

Hedgehogs are listed on Schedule 6 of the Wildlife and Countryside Act (1981) and a species listed in the Biodiversity Action Plan (BAP) under S.41 of the NERC Act. This prohibits:

- Intentional or reckless injuring or killing;
- The use of traps, snares, nets to kill or capture hedgehogs.

All wild mammals are protected from unnecessary suffering and asphyxiation under the Wild Mammals (Protection) Act 1996.

Badgers

Badgers are protected under the Protection of Badgers Act 1992. This act is based on the need to protect badgers from baiting and deliberate harm or injury. The act makes it an offence to:

- Wilfully kill, injure, take, possess or cruelly ill-treat a badger, or attempt to do so;
- Intentionally or recklessly interfere with a sett. Sett interference includes disturbing badgers whilst they are occupying a sett, as well as damaging or destroying a sett or obstructing access routes.

A sett is defined as “any structure or place that displays signs indicating current use by a badger”.

Bats

All British bat species are fully protected under Schedule 5 of the Wildlife and Countryside Act 1981, as updated by the Countryside and Rights of Way Act 2000. All British bats are also included on Schedule 2 of The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 as European Protected Species. It is an offence to:

- Intentionally or recklessly kill, injure or capture bats;
- Deliberately or recklessly disturb bats (whether in a roost or not); and
- Damage, destroy or obstruct access to bat roosts.

A roost is defined as 'any structure or place which [a bat] uses for shelter or protection'. As bats tend to reuse the same roosts, legal opinion is that a roost is protected whether or not bats are present at the time of survey.

A licence will therefore be required by those who carry out any operation that would otherwise result in offences being committed.

The following bat species are listed as being of principal importance for the conservation of biodiversity in England, (commonly referred to as UKBAP Priority species): barbastelle *Barbastella barbastellus*, Bechstein's *Myotis bechsteinii*, noctule *Nyctalus noctula*, soprano pipistrelle *Pipistrellus pygmaeus*, brown long-eared *Plecotus auritus*, greater horseshoe *Rhinolophus ferrumequinum* and lesser horseshoe *Rhinolophus hipposideros*.

Working Method Statement

The methods outlined below must be adhered to throughout the construction period, whereby any habitat suitable for the nesting birds, reptiles, amphibians, hedgehogs, badgers and/or bats is cleared or impacted by the proposed development. The areas of suitable habitat onsite are detailed in Table 1.

Table 1: Protected species and suitable onsite habitat

Species	Suitable habitat onsite with potential to be impacted
Nesting birds	• Woodland areas and dense scrub associated with much of the site boundaries.
Reptiles	• Habitat associated with the boundary features and habitat interfaces, such as the fringe of bracken near the car park, and the fringe of rough

grass between the access road and adjacent woodland along the northern part of the proposed fenceline.

- Areas of scrub and longer tussocky field margins surrounding the field to the north-west of the site.
- Suitable reptile hibernation habitat along eastern boundary where there were log piles, stones, mulch piles and/or rubbish.

Amphibians	• Suitable terrestrial habitat along the site boundary, including sections of woodland, bracken, and longer tussocky field margins.
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Hedgehogs	• Suitable nesting and foraging habitat across much of the site peripheries, including woodland, dense scrub and longer tussocky field margins.
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Badgers	• Woodland, dense scrub, and longer tussocky field margins present along site boundary features.
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Bats	• Potential roosting features identified within woodland habitats and the woodland edges adjacent to the grassland. • Suitable foraging and commuting habitat cross boundary features of site with good offsite connectivity to woodland in the wider area including Royal Victoria Country Park.
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Nesting Birds

Any vegetation removal should be undertaken outside of the breeding bird season (March – September inclusive) between October and February. Where clearance or other works are not possible outside of bird nesting season, a nesting bird check will be undertaken by the appointed Ecological Clerks of Works (ECoW) no more than 48 hours before the start of the works. Briefly, this will include a finger-tip search of the vegetation to be cleared.

Should any active bird nests be discovered, appropriate measures will be put in place to ensure that any nest is not disturbed. This will involve placing a suitable buffer around the nest (to be delineated with appropriate tape), within which no works will be undertaken until the nest has been judged, by a suitably qualified ornithologist, to no longer be in use (i.e. fledged young have left the nest, or the nesting attempt has failed).

The radius of the protective buffer will be dependent on the species present and stage of breeding (i.e. with eggs, chicks, etc.) and will be determined by an ecologist.

Where no active nests are located, construction works will proceed immediately and will be completed within 48 hours of the inspection.

Reptile and Amphibians

The clearance of longer tussocky grassland/scrub should be removed a multi-phased manner when reptiles are active (March – October) to will ensure any reptiles that are present move out of the area to be cleared into surrounding retained habitat. The method detailed below will also cover the precautionary works in place for amphibians.

A two-stage, precautionary strim will be followed; to move any amphibians or reptiles present towards the retained areas of habitat to the north-west of the site. This would be undertaken when amphibians and reptiles are active (March – October) during suitable weather, overseen by a suitably qualified ecologist. The first cut would be to circa 15-25cm in height, and will be carried out directionally, towards the retained habitat, to 'encourage' any species present to move. The second cut (to ground level) will be undertaken circa 24 hours after the first cut.

Any features of high value for reptiles or amphibians (such as log piles, stones, mulch piles or rubbish) should be dismantled by hand by the attending ecologist. Any reptiles seen will be caught by hand and re-located to nearby suitable habitat by the ecologist.

Ecological supervision will be undertaken during relevant areas of fencing installation.

Materials will be stored in a in such a way as to prevent the creation of suitable GCN hibernacula. Storage of materials is suggested as follows:

- Gravels, sand and other aggregates will be stored in builder's bags to prevent animals crawling or burrowing into the material. Where possible these bags will be raised on pallets;
- Pipes / cables will be stacked on pallets or otherwise raised off the ground to prevent animals entering, and where possible they will be capped, or otherwise checked before use for the presence of animals;
- Upon completion of the works and during the clearance of remaining materials, the ECoW will check beneath these for the presence of GCN and;
- Any chemicals or machinery are to be stored in a secure compound.
- Any open piping, whether stored in the lay-down area or installed, will be capped overnight to prevent animals entering;
- Any open excavations will have a graded ramp constructed at a maximum angle of 45° and will be checked for any trapped animals at the start of each working day by site workers;
- Works will be carried out as quickly as possible, to avoid unnecessary delays; and
- Root protection areas of retained trees must be observed at all times. For retained trees and recommended root protection please see the Arboricultural Impact Assessment for the site.

Hedgehogs

During construction the following should be implemented in order to prevent harm to foraging and commuting hedgehogs:

- Any open deep excavations to be sloped or securely boarded / fenced to prevent entrapment;
- All rubbish to be picked up daily and stored appropriately;
- Night work should be avoided where possible, and any flood lighting should face away from the site boundaries;
- Excavations to be checked for trapped animals daily; and
- Any hazardous materials to be stored in a secure store.

Badgers

A pre-commencement badger survey will be undertaken by a suitably qualified ecologist no more than one month prior to fence installation, to confirm (or otherwise) the continued presence of badgers and to record any new setts that may have been excavated in the interim. Results of the survey will be detailed in a separate survey report produced by RPS.

To comply with the recommendations made in the Ecology Report (Hampshire County Council, 2024), 2-way badger gates are to be installed in approximately six locations around the fence where the fence passes through woodland to maintain badger dispersal. The 2-way badger gates will be located along existing mammal paths to avoid disturbance to badger foraging and commuting routes, likely along the woodland area. Mammal paths would ideally be identified onsite during the pre-commencement badger surveys.

Where gates are used, approved metal gates, such as the Access Badger Gate from NHBS (see Appendix A) should ideally be installed, as wooden gates are prone to damage. The gates should

be installed in line with manufacturer's instruction, which includes driving the spikes into the ground until the base is flush, and the perimeter fixed to the surrounding fence. Once installed, the gates should be secured open for a period of at least four weeks to allow mammals to discover the gaps. Once this establishment period has elapsed or active use is determined, the door should be shut and set to two-way entry.

Prior to commencement of construction, a suitably qualified ecologist will provide a Toolbox Talk to all site contractors to ensure that they are made aware of the presence of badgers in the area, the risks associated with the works, legislation, and appropriate working methods to avoid impacts to badgers. The ecologist will ensure that the 30 m buffer around the badger setts are clearly marked on the ground, with appropriate fencing erected to avoid accidental encroachment. The fencing should allow badgers to pass underneath to avoid disrupting foraging and commuting routes.

The landscaping works within the 30 m buffer should be supervised by a suitably qualified ecologist to ensure compliance with the legislation protecting badgers and their setts. Light machinery is permitted between 30-20 m, with hand tools only within 20 m of the sett. All contractors will be given a Toolbox Talk prior to commencement of landscaping in the buffer zone.

As foraging and commuting badgers may be present on site and in the surrounding area during the works, it is recommended that the following precautionary mitigation measures are put in place during the works, particularly during any excavation work;

- Mammal ladders (such as a wooden plank) or earth ramps to be placed in any open excavations at the end of each day, and excavations checked for animals each morning;
- Wet concrete (such as for building foundations) should be covered or fenced-off overnight to avoid badgers becoming trapped;
- Should any large pipework be installed, any open pipes should be capped overnight;
- All rubbish, including food waste, must be removed from site at the end of each day;
- Night work should be avoided; and
- Any chemicals or machinery are to be stored in a secure compound.

Should a badger (dead or alive) or suspected badger sett be discovered on site at any time during construction, works must cease, and an ecologist immediately contacted for further advice.

Bats

The trees within the woodland will be retained and protected during the development (afforded protection by perimeter fencing).

All trees that are subject to further works will be checked by an ECoW prior to clearance or further pruning. Any tree with bat roost potential will be subject to a further check by a bat licensed ecologist and if deemed to have suitable bat roost features, it will left *in situ*.

Any trees onsite that are anticipated to have to any potential impacts from artificial lighting will be subject to a further check by a bat licensed ecologist, as necessary. If a potential roosting feature which could support roosting bats or a bat roost is present, then no works will be undertaken which could affect the feature / roost until appropriate mitigation is implemented. All mitigation will be undertaken by the Principal Contractor under the supervision of the ECoW and bat licensed ecologist.

Lighting to be installed as part of the development will be in line with Guidance Note 08/23 Bats and Artificial Lighting at Night (Bat Conservation Trust, 2023), the following will be required:

- Avoid illumination of retained boundary features where possible;
- No direct illumination of any new roost entrances (such as bat boxes);

- Use light sources that emit minimal ultraviolet light and avoid white or blue wavelengths to avoid attracting lots of insects (attracting insects to lamps may reduce their abundance in darker foraging areas favoured by bats);
- 2700 Kelvin colour temperature LED floodlights delivering warm white spectrum lighting;
- Back shields and side shields added to all AMNIS LED floodlights, to reduce spill light and back light as much as practically possible; and
- LED floodlights with >550nm peak wavelengths to avoid the component of light most disturbing to bats (Stone, 2012).

Lighting plans should be designed in consultation with the project ecologists, to ensure that the lux levels on important commuting and foraging routes is less than 0.5 lux at canopy level.

In order to protect foraging and commuting bats during the construction phase, construction works will be limited to 30 minutes after sunrise and 30 minutes before sunset to enable bats to forage and commute without disturbance.

General

Where it is considered, the methods outlined are not being adhered to, the works will be stopped and will only commence once all contractors are aware of the appropriate methodologies to follow. In addition to the measures described above, the following general procedures should be followed:

- An ECoW will be present for the commencement of all works to provide a toolbox talk to all site personnel. The toolbox talk, provided in **Appendix B**, will inform workers of the potential presence of protected / notable species in the working area. The talk will include details of the identification of badgers, GCN, slow worms and other amphibian / reptile species with the potential to be encountered during the works. A species identification guide is provided in **Appendix C**. Following the talk, all personnel will be required to sign relevant documentation to acknowledge they have attended and understood the talk and its content;
- All site personnel not present for the initial toolbox talk must be given a toolbox talk by the site manager prior to starting work on the site, and will be required to sign to say they have had and understood the talk as above;
- The ECoW will oversee works in all areas until it is considered that there is no risk to protected species and that site workers can proceed unsupervised;
- The ECoW will clearly mark out or verbally communicate any sensitive areas which are to be avoided during the works. If contractors work within these areas, they do so against the advice of RPS and may cause an offence should any protected species be disturbed / injured / killed;
- Key works will include the sensitive strimming of arable field edge habitats, using a two-stage directional strimming process, whereby the species are encouraged to move into areas of retained habitat, west of the development zone. Works will be undertaken only in suitable weather conditions (between 10 -18 degrees, dry, no rain), with the vegetation first cut to a height of 20mm, and then left for a period of no longer than 24 hours, followed by a second cut down to ground level. The works will be overseen by a suitably qualified ecologist, with any species found moved to retained habitat west of the access road construction zone;
- Prior to any works on trees or hedgerows / shrub a nesting bird check will be undertaken by a suitability qualified ecologist. Works will only commence once the ecologist has confirmed no nesting birds are present;
- If a suspected protected species is encountered during the works, all works must stop and RPS contacted. Where a protected species is confirmed, all works on site must cease until the EPS licence for the site is in place. Identification sheets for GCN and smooth newts, and other species of amphibians and reptiles are provided in **Appendix C** of this document to aid site workers.

Conclusions

In addition to the mitigation measures outlined above, opportunities for enhancements include:

- Bird boxes to provide good nesting opportunities for birds, either on newly planted or existing trees that are large enough to accommodate them.
- Bat boxes could provide suitable transient roosts for bats.

Such boxes could include the 1SP Schwegler Sparrow Terrace, Vivara Pro Seville woodstone nest box or swift bricks such as the Cambridge Swift Nest Box System and 2FN Schwegler bat box or 2FR Schwegler bat tube. An ecologist should be consulted to inform the exact locations of new bat and bird boxes.

If you have any questions, or need any further clarification, please do not hesitate to contact me.

Yours sincerely,
for RPS



Graduate Ecologist
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Appendix A - 2-Way Badger Gate



Access Badger Gate

Frame Dimensions: 595mm (H) x 295mm (W)

Entrance Dimensions: 320mm (H) x 220mm (W)

Material: Marine Grade Aluminium

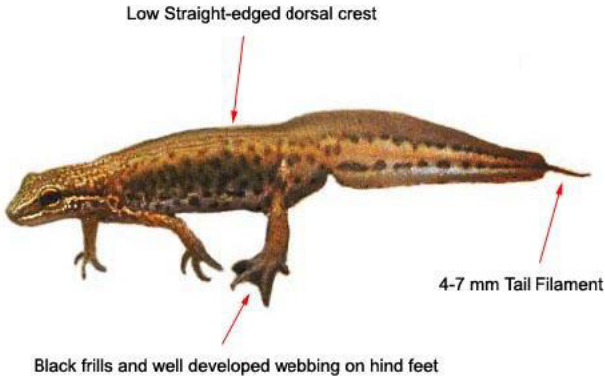
Weight: 3kg

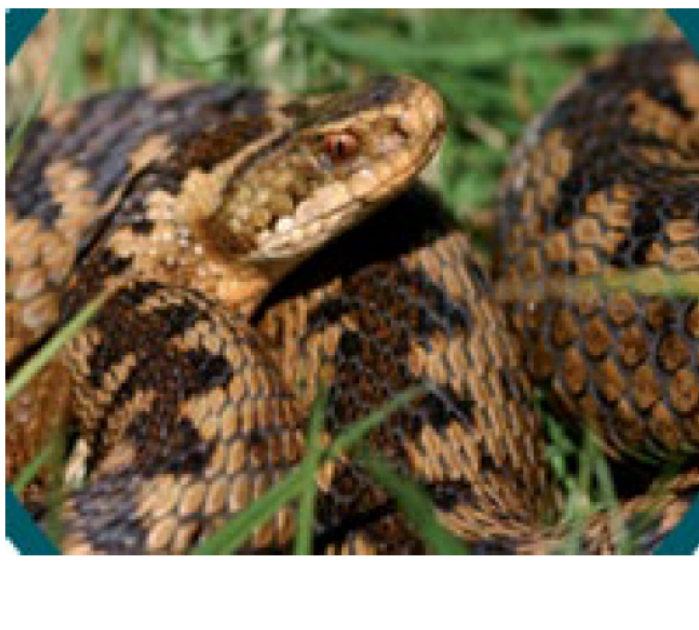
Appendix B – Confirmation of Toolbox Talk Attendance

Name of Site Worker	Tool-box Talk Delivered by Ecologist	Site Worker Knows Where a Copy of the Working Method Statement is Stored on Site	Date	Signature

Appendix C – Reptile and Amphibian Identification

Great Crested Newt	Male:  Female: 	• -Up to 17 cm in length. • -Rough, black / dark brown colour skin with darker spots (warty looking), sometimes with finer white spots on the lower flanks. • -Bright orange / yellow and black blotchy belly. • -Jagged crest along back and along top of tail, with gap between back and tail (only visible in water during the breeding season). • -Male: White / silver / grey strip down centre of tail. • -Female: Orange / yellow strip along bottom edge of tail.
Smooth Newt	Male:  Female: 	• Compared to GCN: • -Smaller; up to 10 cm in length. • -Skin without rough texture, and lighter in colour. • -Wavy crest along back and top of tail, without gap (only visible in water during the breeding season). • -May have orange/yellow belly but with fewer black blotches.

Palmate Newt	 Male during breeding season: 	• Compared to GCN: • -Smaller; up to 10 cm in length. • -Skin without rough texture, and lighter in colour. • -Wavy crest along back and top of tail, without gap (only visible in water during the breeding season). • -Usually yellow belly but with fewer black blotches. • - Unspotted pink or yellow throat • -During the breeding season males develop a filament at the tip of their tail and black webbing on their back feet.
Common Frog		• -Up to 13 cm in length • -Usually a shade of olive-green or brown • - Dark patches on the back, stripes on the hind legs, and a dark 'mask' behind the eye. • -Oval, horizontal pupil.
Common Toad		• -Up to 13 cm in length • -Generally brown or olive-brown but may be darker. • -Skin is 'warty' and relatively dry. Belly usually pale with dark speckles. • -Oval, horizontal pupil. • -Tend to crawl rather than hop.

Smooth Snake		• Adults 60-70 cm in length. • Females often bigger than males. • Slender body. • Usually grey or brown in colour with a paler belly. • Usually have two rows of dark spots down the back and a heart-shaped crown on the head. • Dark line runs along the side of the head, through the eye. • Circular pupils.
Adder		• Adults 60-80 cm in length. • Stocky body. • Males generally grey with black markings. • Females generally light brown with dark brown markings. • Very young individuals reddish-brown but zigzag pattern still visible. • Completely black (melanistic) adders quite common in some areas. • Zigzag pattern down centre of the back and a 'V' or 'X' shaped marking on the head. • Reddish iris with vertical pupil.
Grass Snake		• Adults up to 150 cm in length. • Grey-green in colour with a cream, yellow or light green belly. • Distinctive yellow and black collar behind the head. • Dark markings along the side and belly. • Circular pupil

Common Lizard		• Adults up to 15 cm in length (including tail). • Males have a larger head and slimmer body than females, and prominent swelling at the base of the tail. • Usually a shade of brown but colour variants include yellow, green and black. • Pattern of spots and/or stripes down the back. • Males have a yellow/ orange belly with black spots. • Females have a pale, un-spotted belly. • Often mistaken for newts. Lizards have scaly, rather than smooth skin and move away very quickly when disturbed
Slow Worm		• Adults up to 50 cm in length. • Juveniles very thin and around 4 cm in length. • Shiny, smooth skin. • Males: usually grey or brown in colour. May have bright blue spots. • Females: usually golden brown on top and darker on sides and belly. Often have a dark stripe running along back. • Juveniles: black or dark brown belly. Gold, silver or copper sides. Often have a dark stripe running along back. • Visible eyelid. • May be confused with snakes: unlike snakes they can blink, have a flat forked tongue and can drop their tails if attacked