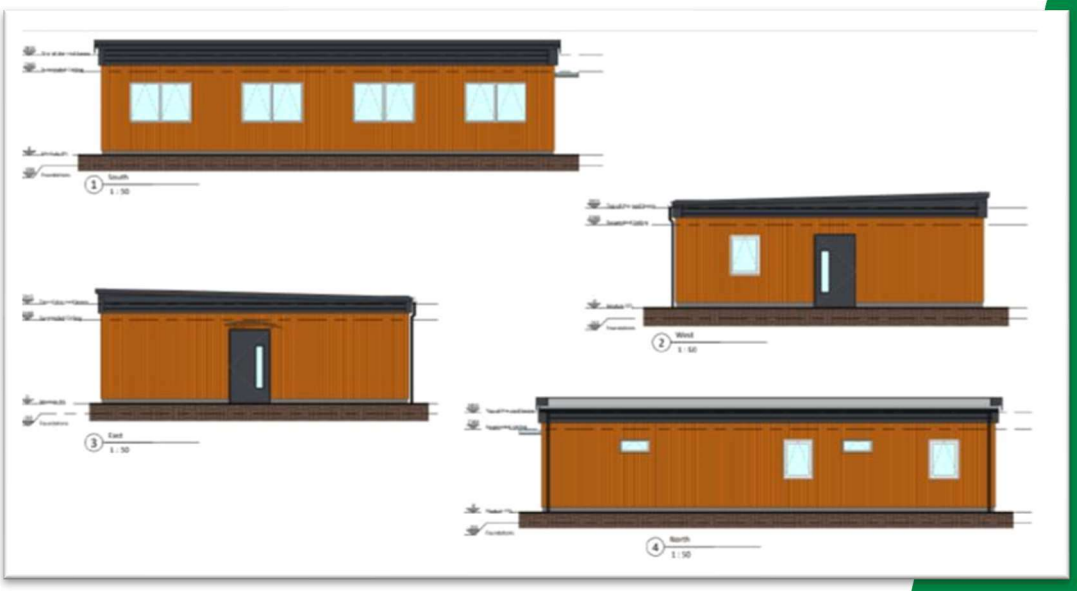
Forestry England

Supporting Planning Statement

Jeskyns Forestry Operations Support Facility



Jeskyns Forestry Operations Support Facility

Introduction

This proposed development is being sought to provide a new operations support facility at Jeskyns which will also support the wider operational forestry management of the Thames Chase Beat, part of Forestry England's East of England Forest District.

The proposed building is of a simple modular form comprising of factory preconstructed units clad with Thermawood to fit within the ethos of the Forestry England, it will still be a single storey structure sited within the existing operational yard area at Jeskyns.

This new facility will be a direct replacement of the existing temporary Portacabin structure.

Thames Chase Beat

The Thames Chase Beat covers an area of over 3,000 hectares of land including lowland pine forest, a range of mixed woodlands including ancient woodlands which are subject to various statutory designations including Special Protection Areas, Special Areas of Conservation, Sites of Special Scientific Interest and Areas of Outstanding Natural Beauty.

Principally, the land is utilised for the commercial production of sustainable timber products but with additional focuses on recreational activity and environmental protection.

Replacement Facility

Background

This project will provide a new operational beat facility at Jeskyns. Currently, staff are using a hired Portacabin style arrangement with external temporary Portaloo ablutions plumbed into a cesspit tank without discharge which are not suitable, and the welfare facilities are located remote from the office inside a tractor shed. In the winter months the external toilets tend to freeze over and become unusable. Also, the toilet facilities are not linked to the Portacabin and staff must walk over 65m to use them, often in

inclement weather. There is clear demand for a modern facility which is fit for purpose, provides a safe and comfortable working environment that is functional and cost-effective to maintain.

The site at Jeskyns is located on the southern side of the Jeskyns Community Woodland and therefore is distinct from the recreational offer at Jeskyns. From here, staff undertake operational forestry management for Jeskyns and the greater Thames Chase area, which forms part of Forestry England's East of England District area. The office is located approximately 96 miles from the main district office at Santon Downham and 30 miles from the Bedgebury office and 21 miles from the Thames Chase Office. Currently, there are three full-time staff based at Jeskyns and six part-time staff who work regularly at Jeskyns but are based at Thames Chase as their reporting office.

The proposed building is of a simple modular form comprising of factory preconstructed units clad with Thermawood to fit within the ethos of the Forestry England, it will still be a single storey structure sited within the existing operational yard area at Jeskyns.

This new modular construction will also allow a PV System to be incorporated into the design by allowing at least 10 x 400Wp solar modules to be fitted onto the roof, thus enabling Forestry England to use renewable energy to count towards Carbon Offsetting. This, together with a "fitted for" Electric Vehicle charging point will also contribute to Forestry England's commitment to the Governments Greening Commitments to meaningfully reduce greenhouse gas emissions on our way to being net-zero by 2030.

Relocation and siting of facility

The site area has been rationalised to provide a site layout that suits the constraints of the site, optimising building orientation, and topography to benefit drainage strategies as well as increasing security of the site by utilising the office location to ensure passive supervision.

The proposed building has been arranged to be the most efficient for both operational and orientational purposes. By siting the new facility to the south of the existing building the location is optimised for passive environmental controls such as natural daylight, solar control and natural ventilation. Locating the replacement building away from the existing site and demolishing the redundant agricultural grain silos will enhance the appearance of the site as well as moving it further away from neighbouring residential properties.

The proposed location is within the context of existing buildings, which are being retained. This will act to screen the development from wider landscape views.

Design and appearance

As the facility will be a place of work the look and feel of the building has been prioritised and will take the form of a simple structure, clad with timber to compliment the existing buildings on site. The timber cladding will naturally weather and 'silver' over time. Full plans including artist renderings of the building have been submitted along with the application to better illustrate the proposal.

Existing car parking will be retained for visitors but formalised. This will include disabled parking bays and electric charging points for two electric vehicles.

The operations yard is well-screened and it is intended to retain this. An area adjacent to the proposed building to the east will be planted up as a tree nursery to further soften the appearance of the building.

No changes to the existing site access are proposed as part of the works.

Sustainability

Considerable thought has gone into the design of the building to ensure a sustainable facility that is energy efficient with a low carbon loading.

The proposed design incorporates natural cross-ventilation and other sustainable strategies. Robust construction methods are proposed that meet or exceed U-values and promote high levels of air tightness.

As mentioned previously, the following passive environmental techniques will be used within the proposal to create an appropriate teaching environment:

- Natural Daylight
- Solar Control
- Natural Ventilation

The proposed building will be of prefabricated modular construction. This method utilises off-site construction to limit the impact of construction works on site and results in the simplest and most sustainable construction.

It is proposed that an air source heat pump is installed to heat the building and renewable technologies have been chosen that will complement the energy usage of the building which are simple and robust to operate and maintain.

Civil Design Strategy

Existing fouls and surface water drainage

Foul flows generated by the existing site use are currently taken to a cess pit which is emptied for processing elsewhere. Surface water drainage is to a soakaway.

Proposed foul and surface water drainage

Foul water flows generated by the new building will be connected to the public sewer network.

Surface water run-off from the new building will be collected via gutters and rainwater downpipes and conveyed into the existing system.

Existing site surfacing / hardstanding

The existing site surfacing comprises a mix of concrete, compacted hardcore and asphalt surfaces. This existing site surfacing is largely to be retained.

Proposed site surfacing / hardstanding

A new area of asphalt surfacing is to be provided, to formalise the existing parking space available adjacent to the new building.

Ecology & Landscaping

The site itself is clear of trees and no trees are intending to be felled to accommodate the construction works with the exception of some scrub trees of limited environmental value which have grown up around the redundant silo buildings which are to be demolished. An assessment of potential bat roosts on the site has been commissioned by an external consultant, Anglian Ecology, and their report is in Appendix 1.

An area of open space to the east of the proposed building is going to be converted to a tree nursery as mentioned previously. This will offer an environmental benefit as well as offer some measure of screening. No additional landscaping is proposed as the building will be screened from the north, south and west by existing vegetation or buildings.

A Preliminary Ecological Assessment has also been undertaken by Anglian Ecology and the full report can be found in Appendix 2. The following information has been extracted from the summary of that report:

A brief inspection of the large barns on site was undertaken with reference to whether there might be any evidence of bat roosts within them in areas where the proposed works or any new lighting may affect this species if present. No evidence of bat usage was found. The survey also included a walkover of all the existing former grain silo areas, particularly the four silos immediately to the east of the proposed new building which may be dismantled and removed, again, no evidence of protected species was found in these silo areas.

Forestry England obtained records for protected species and sites, birds, and invasive species from Kent and Medway Biological Record Office. There are 181 records of protected species within a 2km radius of the site and 1327 records for birds. No records pertain directly to the site area. There are three equidistant records for different species all from 150m away: Grass snake (Natrix helvetica), dated 2020, to the northeast, common frog (Rana temporaria), dated 2012 to the northeast, and common pipistrelle (Pipistrellus pipistrellus) to the south, dated 2007.

Other records within the 2km search radius undertaken in house by Forestry England are for brown hare (Lepus Europaeus), flowering plants, badger (Meles meles), common toad (Bufo bufo), moth, butterfly, hedgehog (Erinaceus europaeus), adder (Vipera berus), at least six species of bat, 56 records for dormouse (Muscardinus avellanarius), and at one old record for great crested newt (Triturus cristatus).

No evidence of protected species was found on site or within the area of proposed works from the site walkover. The majority of the site consists of hardstanding, driveways, and former agricultural buildings, with grain silo arrays to the east and south of the main barns. However, there is a narrow belt of woodland to the south and southeast of the survey area in which species include mature beech (Fagus sylvatica), yew (Taxus baccata), field maple (Acer campestre), hazel (Corylus avellana), and silver birch (Betula pendula). There are also areas of improved grassland and tall ruderals.

Close to the site lie species -rich hedgerows, and bands of woodland bordering the site to the north, west, and east. These areas will be habitat for protected species such as bats and small mammals. In addition, there is a pond 80m to the west of the proposed site area, located in woodland beyond the west site boundary, and approximately 90m to the north of the site lies Henhurst Lake and a further lake, to the northeast. The site has ecological continuity with Jeskyns Community Woodland area. Both reptiles and amphibians will be utilising the margins of the site, and it is possible that they may be within the proposed area of works from time to time, however, given the existing terrain the likelihood of harm to these species is considered a very low if the requirements of this report are adhered to.

Currently the proposed works are relatively minor in scale and confined to areas of low impact (i.e. existing hardstanding or short grass), and foundations are shallow, it is therefore considered that the construction of the new building and associated services will have a minimal impact of the biodiversity and very low potential impact on any protected species so long as the recommendations within this report are followed. The proposals may require the removal (by dismantling) of the four silos to the immediate west of the site area. This area and the silos were searched, and no evidence of protected species or likely habitat was found within the silos or the immediate area around them.

The site lies within the SSSI Impact Zones4 of Shorne and Ashenbank Woods SSSI 800m to the east, Cobham woods SSSI 2.1km to the east, Great Crabbles Wood SSSI 3.9km to the northeast. It also lies 400m to the east of the Kent Downs Area of Outstanding Natural Beauty. The site is part of the Green Belt around Gravesend. The proposed works will not impact in any of these sites.

Anglian Ecology makes a number of recommendations that shall be adopted and which include:

- The appointment of an Ecological Clerk of Works (ECoW) who will provide a Reasonable Avoidance Method Statement (RAMS) which will detail best practice working methodology and reasonable avoidance measures to be in place on site throughout the duration of works. The ECoW will also be responsible for agreeing exclusion zones, supervising vegetation removal, and delivering Toolbox Talks to contractors, as well as ensuring any mitigation/ compensation and enhancement measures are fulfilled. Please see the Construction Environment Management Plan in Appendix 3.
- The installation of bat boxes to the exterior of the proposed building.
- Retention of long vegetation in the vicinity of the site.
- The installation of bird nest boxes around the site.
- External security lighting will be minimised focussed and downward with no spillage and activated on passive infra-red sensors to avoid light pollution.

Town & Country Planning

Pre-application advice was sought from Gravesham Borough Council and received 23 September 2021 under reference PRE20210302. A copy of the advice is available at Appendix 4.

The original proposal for which pre-application advice was sought was significantly larger than the building now proposed, however, the proposed siting remains unchanged.

The main planning considerations identified were:

1. Is the proposed development appropriate in the Green Belt?
2. The effect of the proposal on the openness of the Green Belt
3. Design and visual impact
4. Impact on landscape
5. Impact on residential amenity
6. Highway issues
7. Heritage assets

These are considered below.

Appropriateness and impact on Green Belt

The proposed building has been designed for and will be used as a forestry facility to support the management of the Public Forest Estate. Such developments of buildings for forestry purposes are excepted forms of development within the Green Belt.

The proposed scope and scale of the proposed building is modest, focussed on functionality and contained within an existing forestry setting.

The current site is well established and was formerly an agricultural unit which the present forestry use has adapted. The site is already well screened from view and the proposed building will be closely located immediately adjacent existing, taller buildings already on site and therefore will not impact on the openness and long views that are otherwise characteristic of the area. In addition, the redundant agricultural silos will be removed and as these intrude into the surrounding skyline this will lead to a visual improvement.

Additional landscaping in the form of a tree nursery to the east of the site will further soften and enhance the setting of the buildings.

The independent Preliminary Environmental Assessment concluded that the proposed development would have no impact on the Green Belt.

Design and visual impact

National and local policies require that new developments are "*visually attractive, fit for purpose and locally distinctive*" and "*conserve and enhance the character of the local built, historic and natural environment*".

The pre-application advice acknowledges that the proposed building (notwithstanding the fact that the original advice was for larger structure, the now proposed building has retained many of the previous design elements and considerations, therefore pre-application comments remain relevant) is of a functional design which would be consistent in appearance with an agricultural or other rural building. The choice of cladding and roof finish have been selected to be consistent with the vernacular of the existing site and, in the case of the wood cladding, will help soften the appearance of the building.

The advice further considers that the "*proposed design and appearance of the building is considered acceptable and would not have a harmful impact upon the visual amenity of the wider locality. As such it is considered that in these respects it would meet the tests set out in the NPPF and Policy CS19 of the Council's Core Strategy*".

Impact on landscape

The proposal will see the demolition of existing agricultural silos on the site which will enhance the area. In addition, the proposed building is modest in scale, located within the context of the existing buildings on the site and incorporates natural materials in the cladding to soften the outward appearance of the structure.

The pre-application advice noted: "*it is considered that there would be no material harm to the local landscape or conflict with Section 15 of the NPPF or Policy CS12 of the Core Strategy*".

Impact in residential amenity

The new building will be set within the context of the existing site and the extant buildings. This moves the existing staff facilities further away from neighbouring residential properties. In addition, the demolition of the agricultural silos will enhance and improve the skyline associated with the site.

The modular construction of the building, which is constructed off site, will also limit the impact from site deliveries and working during the construction phase.

No trees or existing screening vegetation will be removed to facilitate the construction of the building but will instead be enhance through the planting of a tree nursery.

The pre-application advice stated: "*There would be a significant separation distance between the proposed building and nearby residential properties. As a result of this, it is unlikely that the proposed development would result in a loss of amenity to nearby occupiers in terms of loss of privacy, loss of daylight/sunlight or loss of outlook*".

Highway issues

The proposal will not generate any additional vehicle movements than those which are already associated with the use of the site. The building is designed to accommodate the

existing staffing at the site and will simply improve the working conditions for those staff as well as those staff from other locations in the District who regularly use Jeskyns for welfare and well-being reasons.

No additional car parking is proposed but the areas where parking takes place will be formalised and improved through surfacing.

Heritage assets

As indicated previously, the proposed building is located further away from existing residential properties, including the two listed buildings: Jeskyns Court and Jeskyns Court Granary. Further protection of these heritage assets is noted from the fact that the new building will be screened from these properties by the existing buildings on site.

Again, the removal of the agricultural silos will enhance the skyline and outlook from the listed properties.

The pre-application advice noted: "*given the separation distance between these buildings and the proposed new building, together with the existence of intervening buildings, it is considered that the proposed new building would not impact upon the setting of these listed buildings*".

Conclusion

The new building will provide a fit-for-purpose modern facility that is essential for the continued management of the public forest estate in the Thames Chase Beat area and has been sensitively designed and sited to fit within the context of the existing site in terms of form, operational need and ecological impact.

Although the site is relatively isolated and in the countryside this is necessary given the nature of the function that the building fulfils. Whilst this is an application for a new structure in the countryside, it will replace an existing building and function and will facilitate the continued management of the public forest estate.

The design of the proposal has been modified to ensure there is limited impact on the character and appearance of the locality including local landscape impacts. There will be no adverse impact on local amenity. There are no changes to numbers or frequency of vehicle movements associated with this proposal. No significant adverse ecological impacts are identified, and enhancement measures are proposed in accordance with the Preliminary Ecological Assessment.

The proposal is compatible and in alignment with local and national planning policy and the proposed use, form and scale of the proposed building clearly demonstrates that this building should be considered as permitted development as a forestry building.

Appendix 1

Potential Bat Roosts Assessment

PRELIMINARY GROUND -BASED ASSESSMENT OF POTENTIAL BAT ROOSTS IN TREES AND SILOS AT: JESKYNS FARM, JESKYNS ROAD, GRAVESEND, KENT





Recipients: Mr. Duncan Slade, **MRICS**
Assistant Area Land Agent, Forestry England
East England Forest District Office
Date of Field Survey: 23/02/2022
Survey undertaken by Sue Morgan CEcol, MCIEEM, CEnv, MIEMA
Checked by MP 07/03/2022
www.anglianecology.co.uk

Tel: 007753406866
Email: sue@anglianecology.co.uk
Address: 1, Red House Farm Cottage, Pixey Green Stradbroke, Eye, Suffolk IP21 5NJ

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SUMMARY

NB. All measurements are approximate unless specified otherwise and should not be relied upon for AIA calculations.
Anglian Ecology was commissioned by Forestry England to undertake a Preliminary Bat Roost Assessment (PBRA) of 23 individual trees in a small copse of woodland located on their site at Jeskyns Farm, Gravesend, Kent.
The survey was in relation to the possible felling of some, or all of these trees to accommodate the building of a new office facility.
In addition, 12 full-size metal grain containers, due to be demolished and removed as part of these works, and two small fan houses situated amongst them, also due for demolition, were inspected for the presence/absence of bat species and/or breeding birds.

This survey was undertaken on Wednesday March 23rd, 2022, in appropriate weather conditions. The aim of the survey was to assess all trees and silos for potential bat-roost features (PRF's)[1] and decide if further survey work for bat species is required to inform works.

The trees were assessed from the ground using the methodology as laid out in section 6.2 (Preliminary ground level roost assessment – trees) of the BCT Bat Surveys for Professional Ecologists Good Practice Guidelines[2] and the BS 8596:2015: 'Surveying for Bats in Trees and Woodland' - Guide. The survey also considered the site's potential for commuting and foraging bats with reference to recent bat records, potential roost sites, and wider landscape connectivity. There are 14 records for bats within the 2km search radius covering at least six species. No bats were observed on site during the field survey.

After inspection, each tree was assigned a category using the current BS 8596:2015 and BCT guidelines for such surveys[3], with additional considerations referencing the Bat Tree Habitat Key (BTHK 2020)[4] and Bat Roosts in Trees: A Guide to Identification and Assessment for Tree-Care and Ecology Professionals[5]. Any numbering of trees pertains to this survey and does not correspond to any previous tree survey or condition assessment.

No trees on the site showed definitive evidence of bat usage and no bat roosts were discovered during the survey. However, during a ground-based assessment this is not unusual and does not indicate that the trees are not suitable for bat usage. Overall, the site being an unlit and in close proximity to woodland was assessed as having a very high suitability for both roosting, commuting, and foraging bats.

From this preliminary ground based survey, eight trees were assessed as having a High potential for bat roosts, The remaining 15 trees were all classified as having a low suitability to contain bat roosts.

All trees with High suitability will require further secondary survey to ascertain the presence/absence of bat roosts before any works. These surveys may be either tree climbing or MEWP platforms to inspect potential PRF's at close quarters. If any bat roosts or evidence of bat roosting is found, then further stage three surveys will be required to identify which bat species are using the tree(s) and in what ways. These stage three surveys would take the form of activity surveys, or advanced bat survey techniques, or possibly a combination of these. The survey methodology for individual trees needs to be proportionate whilst ensuring that a robust survey methodology is adopted. Many are included in this 'High' category because they are heavily colonised by ivy *(Hedera helix)* which prevents any meaningful examination of the stems and branches for PRF features.

The value of this small copse, situated to the north boundary of the site is a potential habitat for commuting and foraging bats. If confirmed roost sites are found during secondary surveys this situation may need to be re-assessed, depending on the significance of the roost (i.e., species and size).
If no bat roost is found within these trees and removal goes ahead, as amelioration for the loss of foraging habitat native wildflowers and shrub species should be planted elsewhere on this site. Please see discussion within.

[1] Potential Roost Feature, as described by Andrews H L et al BTHK 2020. Bat Tree Habitat Key – 4th Edition. AEcol, Bridgwater, 2020, and Bat Roosts in Trees: A Guide to Identification and Assessment for Tree-Care and Ecology Professionals, 2018.
[2] BCT, 3rd Edition, 2016
[3] BCT Bat Surveys Good Practice Guidelines 3 rd. Edition (2016), BS 8596: 2015 Surveying for bats in trees and woodland - Guide
[4] Bat Tree Habitat Key (BTHK),2013) Andrews H et al.
[5] Bat Roosts in Trees: A Guide to Identification and Assessment for Tree-Care and Ecology Professionals (2018), Andrews H.

NB. No felling works should take place on any 'High' potential tree until the results of further (Stage Two and possibly Stage Three) surveys are known. It is an offence to do any of the following:

- Kill, injure, capture a bat.
- Intentionally disturb bats in their natural habitats, if this disturbance might impact the bat's ability to survive/ breed/rear or nurture their young.
- Damage or destroy a roost, regardless of whether bats are present or not (this is an 'absolute'[6] offence).
- Obstruct access to a roost.

Grain silos and fan houses

All 12 grain silos and the two small fan houses situated amongst the trees were also inspected and no evidence of bats was found. There was evidence of breeding bird in Silo one and Silo seven, and there was the remains of a bird's nest in the more southerly fan house.

Please note: Breeding birds are a consideration on this site as several old nests were observed in the trees. All works to trees containing nests should avoid the breeding bird season which has traditionally been defined as March to September inclusive. However, due to climate change, it is now advisable that works to any potential nest site should be preceded by an ECoW[7] check from February – October inclusive.

Section 5 (Legislation) of this report further informs the client and contractors of their legal obligations with regard to protected species during the potential removal of or works to trees on this site.

[6] An absolute liability offence is a type of criminal offence that does not require any fault elements (*mens rea*) to be proved in order to establish guilt. The prosecution only needs to show that the accused performed the prohibited act (*actus reus*). As such, absolute liability offences do not allow for a defence of mistake of fact.

[7] Ecological Clerk of Works

1. Introduction

1.1 Background and proposed works

Sue Morgan was commissioned by Forest England to conduct a Preliminary Ground Level Roost Assessment for potential bat roost features on 23 trees, 11 grain silos , and two fan houses at their site at Jeskyns Farm, Gravesend, Kent, in connection with a proposal to possibly fell these trees in connection with the development of a new office facility on this site. There is also an intention to remove the grain silos and the fan houses as part of the same project.

The trees were assessed using the evidence in the field at the time and following the best practice methodology[8].The trees were inspected in February when there was minimum leaf cover, and all trees with heavy ivy *(Hedera helix)* colonisation were classified as High to ensure features were not missed. The inspection took place during daylight, on a bright, calm day.
Trees were inspected systematically and consistently from all angles. A high-powered torch (2,000,000 candles), a SeeSnake endoscope, and close –focusing binoculars were used and photographs were taken with a digital camera.
The following documents were provided by the client to inform this survey: Aerial photographs showing the 'Bat Assessment Area' (as per email of 05/01/2022), and 'Annotated Site Plan' as per email of 03/11/2021).

1.2 Personnel

Sue Morgan is chartered ecologist and a chartered environmentalist and holds the FSC Certificate for Advanced Biological Surveying. Her experience includes 22 years of surveying similar sites, and protected species habitats, work on similar projects for The Holkham Estate, Suffolk Wildlife Trust, County and District Councils, The Church of England, The National Trust, multi-national engineering consultancies, and private landowners.
She has experience of a range of survey, monitoring, condition assessment, impact assessment & mitigation techniques; these include Method Statements & EPSM Licensing, Phase I, II & NVC Survey work, Landscaping Appraisals & HLS schemes, BREEAM, and the Code for Sustainable Homes Assessment. She holds Natural England licenses to survey for protected species and delivers training courses for adults on ecological surveying and identification techniques; for more information, please visit **www.anglianecology.co.uk**

NATURAL ENGLAND LICENCES:
Natural England Licence Holder for the Surveying of Barn Owls Number CL29/00106.
Natural England Licence holder Class Licence CL18 Registration number: 2015-11320-CLS-CLS for the surveying & handling of in all counties of England.
Natural England Survey Class Licence WML-CL08 Registration number 2015-19101-CLS-CLS. (great crested newts).
Natural England Survey Class Licence holder 2016-21569-CLS-CLS (dormice).

[8] BCT Good Practice Guidelines 3rd Edition (2016), BTHK 2020 Bat Tree Habitat Key – 4th Edition, AEcol, Bridgwater, 2020, Bat Roosts in Trees: A Guide to Identification and Assessment for Tree-Care and Ecology Professionals, H. Andrews, Pelargic, Exeter 2018, BS 8596: 2015 Surveying for bats in trees and woodland – Guide.

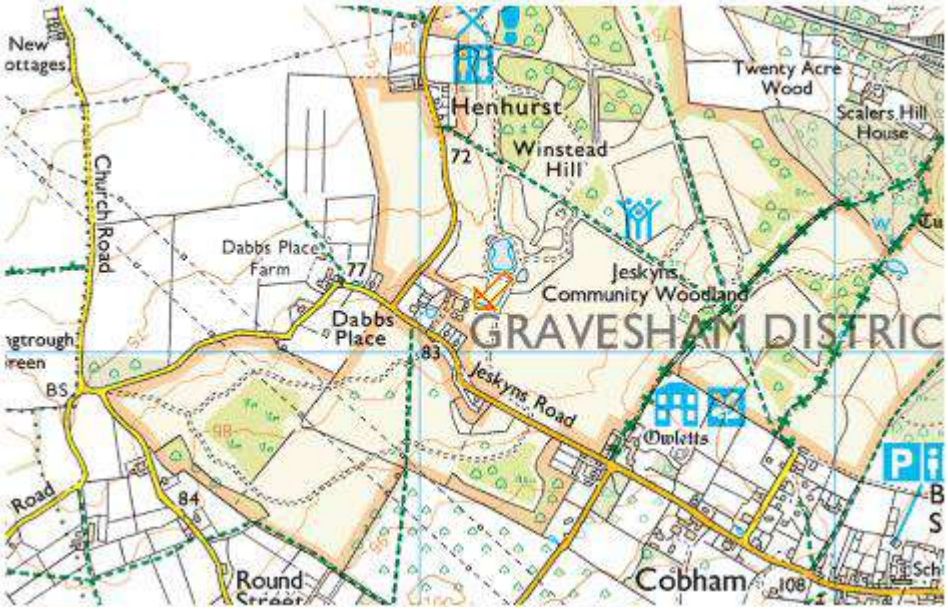
2. Location

2.1 NGR at Site centre: TQ 66122 69114 Location is marked by the red arrow on the map below

2.2 Location Map and address

Jeskyns Farm, Jeskyns Road, Gravesend, DA12 3AL

Please see site centre location on the map below:



The area of trees surveyed is approximately indicated by the red rectangle on the photograph below. The silos lie to the north and west within a fenced compound area. The fan houses are also within this fenced area amidst the silos.



2.3 Site

The trees for potential removal are within a narrow band of woodland which forms the southeast corner of the FE site area. This small copse of woodland is dominated by mature field maple *(Acer campestre),* with a common nettle *(*Urtica *dioica)* and bramble *(Rubus fruticosus agg)* understorey. It occupies a space running east/west between the grain silos to the south of the site and a line of cottages extending north in a narrow band and bordering the area of proposed works.

The woodland although dominated by field maple also contains beech *(Fagus sylvatica)* hornbeam (*Carpinus betula)* alder *(Alnus glutinosa),* silver birch *(Betula pendula),* elder *(Sambucus nigra),* and yew *(Taxus baccata).* It has a close mown grass verge of improved grassland to the south and a pathway along the edge of the fenced silo area to the north. There is a small spring to the western end which crossed the pathway and trickles across into the silo area creating a wet habitat.

The silo area is a reverse 'L' shape. Internally between the silos it is colonised by common nettle, bramble, and elder scrub, with some holly (Ilex aquifolium), silver birch, and mature elders. There is an area of wet vegetation to the southeast corner where the spring expires.

The interior of the silo area was thoroughly searched for any sign of protected species, but no evidence was found. All the mature elders were inspected for bat roosts as they appeared to have 'High' potential, but no evidence of bat presence was found.
There are two small (2.5m x 2m x2m) breeze-block storage buildings with corrugated roofs within the silo area which were also inspected (please see details below).

Close to the site lie species -rich hedgerows, and bands of woodland bordering the site to the north, west, and east. These areas will be habitat for protected species such as bats and small mammals such as dormouse *(Muscardinus avellanarius)* which has been recorded within a 2km radius. In addition, there is a pond 80m to the west of the proposed site area, located in woodland beyond the west site boundary, and approximately 90m to the north of the site lies Henhurst Lake and a further lake, to the northeast.

The site has ecological continuity with Jeskyns Community Woodland area. Both reptiles and amphibians will be utilising the margins of the site, and it is possible that they may be within the proposed area of works from time to time.
For further details of this site please refer to the Preliminary Ecological Appraisal[9] Undertaken in October 2021.

[9] Preliminary Ecological Appraisal Jeskyns Farm, Jeskyns Road, Gravesend, Kent, Anglian Ecology October 2021.

3. Bat records

No bat species were observed during the assessment exercise, but the trees contain many potential roosting sites. There are 14 records for bats within the 2km search radius covering at least six species. No bats were observed on site during the field survey. The nearest record for bat species is for common pipistrelle *(Pipistrellus pipistrellus),* (Bern2, Bern3, CMS_A2, CMS_EUROBATS-A1, HabRegs2, HSD4, ScotBL, WCA5/9.4b, WCA5/9.4c, WCA5/9.5a), dated 2007, from 150m to the south. There are multiple potential roost sites for bats within the mature and semi mature trees to the site boundaries and also potentially within the agricultural buildings within the site area.

Bats will be likely to use the site margins and possibly sheltered courtyard area between the farm buildings for commuting and foraging. Other species recorded within 2km are: Leiser's bat *(Nyctalus leisleri)* (Bern2, CMS_A2, CMS_EUROBATS-A1, HSD4), Soprano pipistrelle *(Pipistrellus pygmaeus)* (Bern2, CMS_A2, CMS_EUROBATS-A1, HSD4), brown long-eared bat *(Plecotus auritus)* (Bern2, CMS_A2, CMS_EUROBATS-A1, HSD4), noctule *(Nyctalus noctula)* (Bern2, CMS_A2, CMS_EUROBATS-A1, HSD4), and whiskered bat *(Myotis mystacinus)* (Bern2, CMS_A2, CMS_EUROBATS-A1, HSD4).
This site, which is currently dark at night, should remain so throughout and after the proposed works.

All bats are protected under UK and European legislation under the Wildlife and countryside Act 1981 (as amended) and Schedule 2 of the Conservation of Habitats and Species regulations 2017 (as amended).

4. Legislation

All British Bat species and breeding bird are fully protected by the Wildlife & Countryside Act (WaCA) 1981 (as amended). All wild birds are protected from being killed, injured or captured, whilst their nests and eggs are protected from being damaged, destroyed or taken.
Certain breeding birds receive *additional* protection through being listed on Schedule 1 of the Act, which also makes it an offence to intentionally or recklessly disturb this species whilst it is nest-building, is at or near a nest with eggs or young, or to disturb dependent young.
All Bat species are also further protected by the Conservation (Natural Habitats &c.) Regulations 1994 ('Habitat Regulations') (as amended). This has been amended several times with significant amendments being made by the Countryside and Rights of Way Act (CRoW) 2000, in 2007, and in 2009, and most recently in 2017, under and update to The Conservation of Habitats and Species Regulations 2017.

The Conservation of Habitats and Species Regulations 2017 Regulations are one of the pieces of domestic law that transposed the land and marine aspects of the Habitats Directive (Council Directive 92/43/EEC) and certain elements of the Wild Birds Directive (Directive 2009/147/EC) (known as the Nature Directives). The changes are made by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.
On this site, this legislation may be particularly applicable for bat and bird species.

The Regulations make it an offence (subject to exceptions) to deliberately capture, kill, disturb, or trade in the animals listed in Schedule 2, or pick, collect, cut, uproot, destroy, or trade in the plants listed in Schedule 4. However, these actions can be made lawful through the granting of licenses by the appropriate authorities. Licenses may be granted for several purposes (such as science and education, conservation, preserving public health and safety), but only after the appropriate authority is satisfied that there are no satisfactory alternatives and that such actions will have no detrimental effect on wild population of the species concerned.
It is a criminal offence, liable to prosecution, which could result in imprisonment or fine, if these regulations are contravened without one of the detailed defences outlined within the regulations.
With reference to this assessment: It is an offence for anyone intentionally to kill, injure or handle a bat, to possess a bat (whether live or dead), disturb a roosting bat, or sell or offer a bat for sale without a licence. It is also an offence to damage, destroy or obstruct access to any place used by bats for shelter, whether they are present or not.
Please refer to the actual legislation for the precise wording, which can be found at:
https://www.legislation.gov.uk/ukdsi/2019/9780111179512/contents

For further information see the link below:
https://www.gov.uk/guidance/bats-advice-for-making-planning-decisions

5. Survey methodology

5.1 Objectives of survey

To examine all 23 trees, 11 silos, and two small fan houses and assign each one an assessment of its potential suitability as a habitat to support roosting bats.
To assess the potential habitat suitability of the site for foraging and commuting bat species.
To complete a report detailing the above and to liaise with the client over any information given.

5.2 Methodology

This survey and report follows the section on bats in trees of the Chartered Institute of Ecology and Environmental Management's Good Practice Guidelines and is in accordance with The Bat Conservation Trust: Bat Surveys - Good Practice Guidelines (3rd Edition) and English Nature (Now Natural England) Bat Mitigation Guidelines. Other sources of reference include BS 8596 Surveying for Bats in Trees and Woodland- guide, and Henry Andrews Bat Tree Habitat Key (BTHK), 2020 online update, and Henry Andrews Bat Roosts in Trees: 'A Guide to Identification and Assessment for Tree-Care and Ecology Professionals,' 2018.

The methodology of the survey consisted of:

- Desktop survey
- Risk assessment
- Assessment of the surrounding habitat.
- Field examination and written report detailing the classification of each individual tree with examples of photographic illustration and referenced to a numerical system from south to north starting from the south, all trees being ground-truthed and tagged.
- External and internal examination of all silos and a report of findings referencing the silos as numbered on site. Internal and external examination of the two fan houses (situated one to south and one to the north of the silo area) and brief description of findings.
- Advice on how to proceed with reference to the potential presence/absence of bat species on this site, including any recommendations for further survey work necessary to obtain more information about how bat species may be using the trees.

5.3 Discussion of methodology

Tree features used by bats include frost cracks, natural tears, woodpecker holes, cracks or splits in major limbs, loose bark, lamination, possibly dense thick stemmed Ivy, hollows, and cavities, and dense epicormic growth; for a more comprehensive list of tree features used by bat species please refer to the BTHK[10].
In winter, bats hibernating in trees at any level can be difficult to find as they make no noise and are much less active, however potential roost features may contain field signs such as smell, evidence of repeated entry/emergence (waxing, polish), and droppings. Identifying and searching cavities for the bats themselves is the most effective method of finding them. In summer, when trees are in leaf, it is more difficult to have a degree of certainty of even the existence of potential roosting features when inspecting from the ground.

If features are situated at a low level, then this can be done with care using an endoscope by someone trained and licenced to do so. In features which may have the potential to be used by roosting bats situated at high levels the most effective method of ascertaining proof of absence/ presence is for a suitably licenced worker to climb and inspect.

In all cases, if the tree is likely to be removed and the tree cannot be inspected clearly from the ground, then climbing or using a MEWP[11] and inspecting, bat activity surveys at dusk and dawn, or netting (under licence) should be undertaken to ascertain if bats are present.

5.4 Discussion on current thinking

Current thinking[12] infers that individual bat species have a preference for tree-roosts which form in abundance, or in a constant supply, in their favoured habitat and these differ both between the sexes and from season to season.
Different habitats are more likely to be used by certain species, for example barbastelle *(Barbastella barbastellus),* is a woodland species which is also found in parkland and on commons, as is Natterer's bat *(Myotis nattereri).* Nathusius's' pipistrelle *(Pipistrellus nathusii)* and Daubenton's bat *(Myotis daubentonii)* are often found in woods, hedge and tree lines but indicate a preference for those near water.

In addition, roost sites are more likely to attract specific species at certain times of year, for example a barbastelle maternity roost maybe more likely to be found in a tear out; a lateral split in an area of widely spaced broadleaved woodland. A distance of < 30m from the woodland edge may be more likely to contain a noctule *(Nyctalis noctula)* roost than one in a high clutter environment.
The internal roost features also play a part in determining which species are most likely to be found within them, with certain species (such as all pipistrelles, barbastelle, whiskered *(Myotis mystacinus),* and Brandt's bat *(Myotis brandti)* preferring a crevice to a void.

5.5 Which bat species are most likely to be present?

Based on the above records, current research[13] and the habitat encountered during the survey the bat species most likely to be utilising the site for foraging and/or roosting are common pipistrelle, soprano pipistrelle, brown long-eared bat, and the bigger bats such as Leisler's and noctule; all these species have been recorded within a 2km radius. Of note are records for whiskered bat within the search radius.

[10] Bat Tree Habitat Key, Henry Andrews, 2018.
[11] MEWP Mobile elevated work platform.
[12] Cf. BTHK. Andrews et al 2013, Bat Roosts in Trees: A Guide to Identification and Assessment for Tree-Care and Ecology Professionals, 2018.
[13] Ibid and Dietz C, Helversen O & Dietmar N 2011. *Bats of Britain, Europe & Northwest Africa*. A & C Black, London, Swift S 1997. Roosting and foraging behaviour of Natterer's bats (*Myotis nattereri* Kuhl 1818) close to the northern border of their distribution. *J. Zool.* Lond., 242: 375-384.

5.6 History

So far as this surveyor is aware there have been no previous bat scoping or activity surveys undertaken on this site.

5.7 Risk Assessment/access /parking

The metal framework on which the silos rest is now old and rusty and liable to give way underfoot. The walking areas between them are also overgrown and contain trip hazards. The woodland copse contains brambles and understorey, and some trees have loose limbs so care should be taken. It is understood that there is asbestos on site which must not be disturbed. Access is from Jeskyns Road to the south and parking is available on site.

5.8 Weather

Date	Temp/Humidity	Cloud Cover	Visibility	Wind Direction	Wind Speed	Rain/Snow
23/02/2022	7°C / 84%	0%	Excellent	NNW	11 mph	None

5.9 Categorisation System

The Negligible (N), Low (L), Moderate (M), and High (H), assessment of suitability for potential bat usage of an individual tree on a site is based on a mixture of Table 4.1 on page 35 of the BCT Good Practice Guidelines 3rd Edition, which is reproduced below, and that employed by the BS8596 Surveying for Bats in Trees and Woodland-guide, table Annex F1. Which requires assessors to award a category of High/Medium or Low as part of a scoping survey exercise. On this site all trees were either 'High' or 'Low or 'Negligible'.

This assessment must be used to inform the need for further secondary surveys should they be required. On a site where certain trees are likely to be removed or subject to works the likely presence of ANY bat (of whatever species or number) within a PRF is important to ascertain ,as disturbance or injury to a bat (or its resting place) is an absolute offence and would require an EPS licence of derogation before works could begin.

6 Example of BCT categorisation system.

Table 4.1 Guidelines for assessing the potential suitability of proposed development sites for bats, based on the presence of habitat features within the landscape, to be applied using professional judgement.

Suitability	Description Roosting habitats	Commuting and foraging habitats
Negligible	Negligible habitat features on site likely to be used by roosting bats.	Negligible habitat features on site likely to be used by commuting or foraging bats.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions[a] and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation[b]). A tree of sufficient size and age to contain PRFs but with none seen from the ground or features seen with only very limited roosting potential.[c]	Habitat that could be used by small numbers of commuting bats such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.
Moderate	A structure or tree with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions[a] and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only – the assessments in this table are made irrespective of species conservation status, which is established after presence is confirmed)	Continuous habitat connected to the wider landscape that could be used by bats for commuting such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water.
High	A structure or tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions[a] and surrounding habitat.	Continuous, high-quality habitat that is well connected to the wider landscape that is likely to be used regularly by commuting bats such as river valleys, streams, hedgerows, lines of trees and woodland edge. High-quality habitat that is well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland. Site is close to and connected to known roosts.

7 Table of Tree Survey Results

The trees were classified using the criteria in Table 4. 1 (above). English rather than Latin names are used for ease of interpretation on site. Each tree status is assessed (Y, Y/M, SM, M, OM, V).
PRF = Potential Roost Feature. H = High potential to support a bat roost (pink shading), L= low potential to support a bat roost (green shading) N - Negligible (pale yellow shading). Special note (red shading).

Trees which are colonised by ivy are automatically classed as having a 'High 'potential; given the condition of the trees there will almost certainly be other PRF's obscured by the ivy and at height within the canopies. Typical of age and species many trees have deep fluting and plated bark.

The trees are numbered 1 - 23 as indicated in the satellite photograph below And identified by tags on each individual tree on the ground.

NB. All tree measurements are approximations and should not be used as the basis for any arboricultural survey.

Date: 23/02/22	Site Character: Working FE site. Former farm buildings with hardstanding, wooded areas to the west and south. Relatively undisturbed. Constraints: • Mature Ivy has colonised a large proportion of the trees hampering inspection. • The floor of the wooded area is uneven and contains brambles and climbers etc. • This is a public access site and current COVID-19 government distancing regulations must be observed. • Surveyors must not work alone on site. S Morgan was always accompanied by FE staff.				Weather: Cool, clear, little wind.	Recorders: S. Morgan, CEcol, MCIEEM, CEnv, MIEMA, Natural England Licence holder Class Licence CL18 Registration number: CLS01334 for the surveying & handling of bats in all counties of England.		
Tree & Tag number	Species	Status (Y, Y/M, SM, M, OM, V) /Constraints	Height	Signs of PRF	Height above ground	Facing - direction of feature	Assessment of roost suitability	Notes/requirements
T1 (0127)	Silver birch	SM/ Ivy clad from base to 10m impossible to inspect accurately. Woodland floor uneven	15m +	Ivy colonisation makes it impossible to inspect	Base to 10m+	All aspects	High	Secondary assessment required.
T2 (0128)	Hornbeam	SM/ Ivy clad from base to 12m. Woodland floor uneven.	14m+	Ivy colonisation makes it impossible to inspect	Base to 12m	All aspects	High	Secondary assessment required.

T3 (0129)	Elder (multi-stemmed)	M/OM /Some ivy colonisation but not comprehensive. Woodland floor uneven.	14m+	Ivy clad	Base-10m	N stem	Low	Very mature tree with ivy on one stem but easy to inspect. No PRF features observed. No further inspection for bat species required before removal. If felled between February – October breeding bird check required.
T4 (0124)	Silver birch	SM// Ivy clad from base to 12m. Uneven woodland floor.	15m+	Very heavily colonised by ivy, thick stems. Small cavity on branch. Shallow folds on main stem. Shallow indent	Base-12m 12m 1-2.5m 7m	All aspects On main stem to the east south and north West facing branch with feature to the south.	High	Secondary assessment required. Features that were possible to inspect showed no sign of bat presence, but ivy masked a large proportion of this tree.
T5 (0126)	Yew	Y/ Small amount of ivy colonisation	5.5m	Small amount of ivy	Base	All aspects	Low	No PRF's discovered, no further inspection required before removal. If felled between February – October breeding bird check required.
T6 (0117)	Yew	Y/ Small amount of ivy colonisation	5m	Small amount of ivy	Main stem	All aspects	Low	No PRF's discovered, no further inspection required before removal. If felled between February – October breeding bird check required.

T7 (0125)	Hornbeam	SM/ Small amount of ivy Uneven woodland floor.	12m+	Very small amount of ivy. Meld	Base 1 – 1.5m	All aspects East	Low	Meld checked with endoscope and no evidence of bat presence found. No further inspection required before removal. If felled between February – October breeding bird check required.
T8 (0103)	Silver birch	M/ Heavily colonized by ivy. Uneven woodland floor, scrub to east makes it difficult to inspect.	15m	Heavily ivy clad, twisted main stem	Base – 10m	All aspects	High	Secondary assessment required. Features that were possible to inspect showed no sign of bat presence, but ivy masked a large proportion of this tree.
T9 (0116)	Silver birch	SM/ Some ivy. Uneven woodland floor	13m	Partially clad with ivy	From base to canopy but scant coverage.	All aspects	Low	No PRF's discovered, no further inspection required before removal. If felled between February – October breeding bird check required.
T10 (0115)	Elder, multi-stemmed.	M/ Ivy on central stem	14m+	Thin covering of ivy	Confined to main stem, scant.	All aspects	Low	No PRF's discovered, no further inspection required before removal. If felled between February – October breeding bird check required.
T11 (0114)	Yew, multi-stemmed	Y .	5m	-	-	-	Negligible	No features found.

T12 (0120)	Yew	Y	5m	Small indents to stem	1 -5m	South	Low	All indents checked with endoscope and considered too shallow for usage by bat species. No PRF's discovered, no further inspection required before removal. If felled between February – October breeding bird check required.
T13 (0121)	Elder, multi-stemmed	M/None	10m	-	-	-	-Low	No PRF's discovered, no further inspection required before removal. If felled between February – October breeding bird check required.
T14 (0113)	Silver birch	M/ Ivy colonisation	14m	Ivy clad	Base – 10m	All aspects	High	Secondary inspection required. Birds nest to north fork (3m north).
T15 (0118)	Hornbeam	SM/ Some ivy, by pathway.	16m	Ivy clad, but spared coverage	Base to 11m	All aspects but not obscuring tree stems or branches	Low	No ivy. No potential bat roosting features found. No PRF's discovered, no further inspection required before removal. If felled between February – October breeding bird check required.

T16 (0119)	Elder, multi-stemmed. West of pathway.	M / by pathway	12m+	-	-	-	Low	Yew branches from T12 extending into T17 from the north. No potential bat roosting features found. No further inspection required before removal. If felled between February – October breeding bird check required.
T17 (0112)	Hornbeam, Single stemmed.	SM/ Some ivy, by pathway	15m	Ivy sparsely covering trunk, does not inhibit inspection.	Base – 5m	All aspects but sparse	Low	No potential bat roosting features found. No further inspection required before removal. If felled between February – October breeding bird check required.
T18 (0131)	Dead Alder	Dead/ Some Ivy, surrounded by scrub to rear (east) of site.	4m	Lifted bark, some fissures, no deep pockets. Small amount of ivy, not preventing inspection.	2-3m Base - 4m	All aspects	Low	All areas could be checked with an endoscope. No potential bat roosting features found. No further inspection required before removal. If felled between February – October breeding bird check required.
T19 (0132)	Alder scrub	Y/ Some ivy, sparse coverage. In amongst scrub, uneven woodland floor area to east of site.	4m	Sparse ivy coverage	Base -3.5m	All aspects	Low	All areas could be checked with an endoscope. No potential bat roosting features found. No further inspection required before removal. If felled between February – October breeding bird check required.

T20 (0133)	Blackthorn	Y/ In amongst scrub	4m	Small amount of ivy .	Ground 3-4m	All aspects, main stem.	Negligible	Some light covering of ivy but inspection possible. No potential bat roosting features found. Thin branched scrub. If cleared between February – October breeding bird check required.
T21 (0111)	Silver birch, multi-stemmed	M/Heavily colonized by ivy,	15m	Ivy covering	Base – 12m	Main stem	High	Secondary inspection required, ivy obscuring all stem
T22 (0122)	Silver birch, three-stemmed.	M/ Ivy clad, 8m to the north of the woodland, on east boundary.	16m	Ivy covering	Base – 11m	All aspects	High	Secondary inspection required, ivy obscuring all stem
T23 (0133)	Alder, multi-stemmed	M/ 8m north from woodland edge, close to the silos on the west.	16m	-	-	-	Low	Landscape tree (Category A). No potential bat roosting features found. No further inspection required before removal. If felled between February – October breeding bird check required.

Please see appendix for photographs of trees.

TABLE ENDS

8 Table of Silo results

Silo Number	Location	Inspection results	Comments
1	To southwest corner.	No evidence of any bat usage. Large (30cm x 60cm) nest to interior at the top of internal ladder affixed to south side (please see photographs in appendix). Quite a flat nest, of sycamore, alder, moss, mud composition, aperture to roof around vent creating potential bird access.	Elder scrub nearby all checked for bat presence/PRF's no PRF's or bat evidence found.
D1	To south	No evidence of bat or breeding bird usage	Rat droppings present. Grain power outlet to N providing potential bat access but no evidence found.
2	To south	No evidence of bat or bird usage.	Hole in roof not evidence of usage as egress/access point by any species. Rat droppings present. Unstable internal floor in parts.
3	To south	No evidence of bat or bird usage. Elder trying to colonise to join with roof on south side.	Rat droppings present, well-sealed.
4	To south	No evidence of bat or bird usage.	5cm of rat droppings and decayed grain covering internal base. Well-sealed.
5		No evidence of bat of bird usage.	Rat droppings present. No apertures for access/egress for bat or bird species.
6	To south	No evidence of bat or bird usage.	Rat droppings present, well-sealed.
7	To south	No evidence of bat usage, remains of birds' nest (alder, sycamore, moss) to east at foot of ladder.	
8	To east	No evidence of bat or bird usage.	Two holes to the west at rim join but no evidence of usage.
9	To east	No evidence of bat or bird usage.	Well-sealed, rat droppings present, floor unsafe.
10	To east	No evidence of bat or bird usage.	Well-sealed, rat droppings present.
11	To east	No evidence of bat or bird usage.	Well-sealed, rat droppings present.

Please see photographs in the appendix.

9 Results of survey of two fan houses

Two Fan houses - to the south and north of silo area.
These buildings are made of breeze block and asbestos with a corrugated metal roof. Each measures approximately 2.5 x 2m with a height of 3m. They were used to house large fans presumably in the past for the grain. Internally they have concrete floors and large metal fan units.

The roofs are exposed with machine-sawn timber supports. Each has a set of double timber doors, (approximately 2m wide) which are usually kept locked, and to the rear of each is a timber trap door (approximately 1m²) which on both buildings is loose and open at the base.

The south building has evidence of rats in the form of droppings and the remains of a bird's nest to the southwest corner. There is a small (15cm x 8cm) section of wall plate missing to the northwest. A small amount of ivy is colonizing the interior to the west, as is a small section of elder. There was no evidence of bat usage from either the internal or external inspection of this building.

Fan house to the south (left and right)





The north building has a letter- box sized gap (40cm x 8 cm) to the southwest corner providing potential bat/bird access. No evidence of bats or breeding birds was found from either the internal or external inspection of this building.

North fan house (left and right (rear view showing open flap)).





10. Commuting and Foraging

The site was assessed for its commuting and foraging potential based upon the criteria set out in table 4.1 of the BCT Good Practice Guidelines (3rd edition), and on other recent research,[14] and the significant evidence in the field. Based upon current thinking this site is of potentially high commuting and foraging value for bat species, and this needs to be taken into consideration when planning any felling. The priority should be to retain some connectivity across this area of the site.

Foraging areas are to be found under the canopies of mature trees, many of which overlap and provide pockets of microclimate which will attract invertebrates and gleaning bat species, added to which this site is unlit.

BCT guidelines state high value foraging and commuting habitat is one which is 'well connected to the wider landscape that is likely to be used regularly by foraging bats such as broadleaved woodland, tree-lined watercourses and grazed parkland'…and where 'the site is close to and connected to known roosts.' Fortunately, the surrounding wider habitat provides multiple roost sites and foraging opportunities. However, every effort to retain a degree of connectivity should be made.



[14] Original Research Article: Effects of greenway development on functional connectivity for bats JulienCarlier[a]JamesMoran[ab]TinaAughney[c]NiamhRoche[c] Carlier J., Moran J. Hedgerow typology and condition analysis to inform greenway design in rural landscapes, Journal of Environmental Management, Volume 247, 2019.
MDPI and ACS Style, Bolliger, J.; Silbernagel, J. Contribution of Connectivity Assessments to Green Infrastructure (GI). *ISPRS Int. J. Geo-Inf.* 2020, *9*, 212.

11 Conclusions and requirements

1. Seven trees will require secondary surveys prior to any works due to their potential to contain roosting bats. It is likely many trees will have developed cavities suitable for bat use which are invisible from ground level. All ivy-covered stems have been categorised as 'High' since potential PRF's will be hidden from view.

2. Many of these trees will need either climbing to facilitate an inspection by a suitably qualified arborist under the supervision of a licenced bat worker or inspection by a bat worker from a MEWP. Alternatively, and possibly additionally dependent on secondary survey outcomes, the trees will need to be subject to bat activity surveys during the active season. These activity surveys would not rule out the possibility that bats may utilise the trees during the winter months.

3. It is important therefore that any future management plans, such as the proposed felling take into account the potential seasonal usage of the trees by bats and the client should liaise with a suitably qualified ecologist to ensure that secondary surveys can be planned during the appropriate survey window, and that no offence is inadvertently committed.

4. Trees classified as having a @Low' or 'Negligible', suitability to contain potential bat roosts could currently be felled or subject to works with no mitigation for bats required. If there is a significant delay before these trees are felled (six months to one-year maximum) then there should be a further ground-based re-assessment before felling.

5. All works to any trees containing nests, (no matter what assessment they have been given for bat potential) should avoid the breeding bird season (now extended to February to October inclusive). Nests were observed in many of the trees on site. Any works to trees which must take place within the breeding bird season, must only take place after checks have been made for breeding bird presence by an ECoW.

6. Irrespective of the planned work to individual trees which may affect bat roosting sites directly, the site is potentially an important commuting and foraging corridor (please see discussion and appraisal above). Any future management of this site should ideally be informed by surveys to establish which bat species are utilising it and for what purpose. This information could then inform management decisions to encourage and either maintain or enhance the site for bat species.

7. The site is presently a dark site with low lux levels. As such it is a valuable resource and every effort should be made to maintain this going forward.

8. The silos showed no evidence of bat usage. Two silos showed evidence of past bird usage (Silos one and seven).
The large nest in silo one remains unidentified but looked relatively fresh.
These silos should be inspected by the on site EcoW immediately prior to any demolition works to ensure no breeding birds are present. Should breeding birds be present then contractors must wait until the chicks are fledged before proceeding with the demolition of these silos.

9. The two fan houses showed no evidence of usage by bat species. The fan house to the south had evidence of last season's bird nest (species unknown). The EcoW for the site should re-check both these fan houses for any evidence of bird nesting immediately prior to demolition.

The conclusions of this survey relate only to the trees listed in the inspection table. No other trees were inspected, and any additional tree removal would require further inspection beforehand.

12. Enhancements/recommendations

12.1 Planting

The loss of foraging habitat could be ameliorated to some degree by the planting of native wildflower borders across the site area which attract invertebrate species. Suggestions for planting are given below.
Angelica *(Angelica sylvestris),* Borage (*Borago officinalis),* Coriander (*Coriandrum sativum),* Corncockle *(Agrostemma githago),* Cornflower (*Centaurea cyanus),* Corn marigold *(Glebionis segetum),* Corn poppy (*Papaver rhoeas),* English Bluebell *(Hyacinthoides non-scripta),* Evening primrose *(Oenothera biennis*), Feverfew *(Tanacetum parthenium),* Honesty *(Lunaria annua),* honeysuckle *(Lonicera periclymenum),* Hyssop *(Hyssopus officinalis),* Knapweeds *(Centaurea nigra, & Centaurea scabiosa),* Lady's smock (*Cardamine pretensis),* Lavenders *(Lavendula native sp),* Lemon balm *(Melissa officinalis),* Mallow (*Malva sp),* Marjoram *(Origanum majorana),* Michaelmas daisy *(Aster amellus),* Ox-eye daisy *(Leucanthemum vulgare),* Primrose (*Primula vulgaris),* Red campion *(Silene dioica),* Red valerian *(Centranthus ruber),* Rosemary *(Salvia Rosmarinus),* Scabious (*Scabiosa sp),* St John's wort (*Hypericum perforatum),* Sweet Cicely *(Myrrhis odorata),* Thyme *(Thymus vulgaris*) & other native sp), Wood forget-me-not *(Myosotis sylvatica),* Yarrow *(Achillea millefolium).*

12.2 Bat boxes

In addition at least three Schwegler 2F Bat Boxes should be installed in an area of retained trees on this site.

Siting and Positioning: On a tree-trunk
Cleaning and Inspection: Easy Cleaning and inspection due to removeable front panel. If occupied by bats, inspection and cleaning must be carried out by a licensed professional
Entrance hole: Slotted hole, Material: Air-permeable and long lasting SCHWEGLER wood-concrete
Dimensions: Height: 350mm Dia.: 165mm, Weight:4kg Approx



12.3 EcoW Presence – In line with the CEMP for this site it is recommended that an EcoW should be appointed to oversee the welfare of protected species and habitats during any clearance works.

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14 Appendices

Top row: Mature silver birch, ivy clad (left) and upper branches (right). Bottom : meld in in hornbeam (left), young yew (right

14.1 Photographs









Top: Ivy clad birch (left), Silver birch to edge of woodland (T22) (right).Ivy scrub over blackthorn (left) mature alder (T230 to north of woodland (right).









Top: Looking east across the line of southern silos (left) and looking back west (right).).Middle: Large nest in silo 1 (left and right). Bottom: Interior of silo floor (left) habitat between silos (right).













14.2 Plan of Trees



14.3 Designations key

	Abbreviated Designation	Full designation	Description
International	Bern1	Bern Convention Appendix 1	Special protection (`appropriate and necessary legislative and administrative measures`) for the plant taxa listed, including prohibition of deliberate picking, collecting, cutting, uprooting and, as appropriate, possession or sale.
International	Bern2	Bern Convention Appendix 2	Special protection (`appropriate and necessary legislative and administrative measures`) for the animal taxa listed, including all forms of deliberate capture and keeping and deliberate killing; the deliberate damage to or destruction of breeding or resting place
International	Bern3	Bern Convention Appendix 3	Special protection through 'appropriate and necessary legislative and administrative measures', of the listed wild fauna species.
International	BD1	Birds Directive Annex 1	Birds which are the subject of special conservation measures concerning their habitat in order to ensure their survival and reproduction in their area of distribution. As appropriate, Special Protection Areas to be established to assist conservation measures.
International	BD2.1	Birds Directive Annex 2.1	Birds which may potentially be hunted under national legislation within the geographical land and sea area to which the Directive applies. (Note that some species are protected by the national legislation of some Member States although hunting would potentially be a separate issue).
International	BD2.2	Birds Directive Annex 2.2	Birds which may potentially be hunted under national legislation only within certain specified Member States. (Note that some species are protected by the national legislation of some Member States although hunting would potentially be legal under the Dir
International	BD3.1	Birds Directive Annex 3.1	Birds (or parts / derivatives of) which may be sold, kept for sale or transported for sale provided they have been legally killed, captured or otherwise legally acquired (see Article 6.1).
International	BD3.2	Birds Directive Annex 3.2	Birds (or parts / derivatives of) which may be sold, kept for sale or transported for sale provided they have been legally killed, captured or otherwise legally acquired provided authorisation has been granted by the relevant Member State (see Article 6.2
International	BD3.3	Birds Directive Annex 3.3	Birds which, in 1979, the European Commission were charged under Article 6.4 with carrying out studies to assess the biological status of and the effects of marketing on such status. (Note this Annex is no longer operative, these studies having now been u
International	CMS_A1	Convention on Migratory Species, Appendix 1	Endangered migratory species in danger of extinction throughout all or a significant portion of their range, and for which Range States are obliged to prohibit taking and to take protective measures to conserve. (Note that taking may be permitted in some
International	CMS_A2	Convention on Migratory Species, Appendix 2	Migratory species having an unfavourable conservation status for which Range States are encouraged to conclude international agreements for their benefit.
International	CMS_AEWA-A2	Convention on Migratory Species, African-Eurasian Waterbirds Agreement - Annex II	Conservation of migratory waterbirds, giving special attention to endangered species as well as to those with an unfavourable conservation status.
International	CMS_ASCOBANS	Convention on Migratory Species, Small Cetaceans Agreement, Baltic, NE.Atlantic, Irish, N Seas	Conservation of small cetacean species to achieve favourable conservation status, conscious that the management of threats to their existence, such as bycatch, habitat deterioration and other anthropogenic disturbance, requires concerted and coordinated r
International	CMS_EUROBATS-A1	Convention on Migratory Species, EUROBATS - Annex I	Protection and enhancement of species populations through legislation, education, conservation measures and international co-operation.
International	CITESA	EC CITES Annex A	All CITES Appendix I species. Some CITES Appendix II and III species, for which the EU has adopted stricter domestic measures. Some non-CITES species.

International	CITESB	EC CITES Annex B	All other CITES Appendix II species not listed in Annex A.Some CITES Appendix III species. Some non-CITES species.
International	CITESC	EC CITES Annex C	All other CITES Appendix III species not listed in Annex A or Annex B.
International	CITESD	EC CITES Annex D	Some CITES Appendix III species for which the EU holds a reservation (CITES reservations - English, French, Spanish). Some non-CITES species.
International	HSD2np	Habitats Directive Annex 2 - priority species	Species which are endangered, the conservation of which the Community has a particular responsibility in view of the proportion of their natural range which falls within the territory of the Community. They require the designation of special areas of cons
International	HSD2p	Habitats Directive Annex 2 - non-priority species	Animal and plant species of Community interest (i.e. endangered, vulnerable, rare or endemic in the European Community) whose conservation requires the designation of special areas of conservation. Note that the contents of this annex have been updated in
International	HSD4	Habitats Directive Annex 4	Animal and plant species of Community interest (i.e. endangered, vulnerable, rare or endemic in the European Community) in need of strict protection. They are protected from killing, disturbance or the destruction of them or their habitat. Note that the c
International	HSD5	Habitats Directive Annex 5	Animal and plant species of Community interest whose taking in the wild and exploitation may be subject to management measures.
International	OSPAR	OSPAR Convention	OSPAR Convention for the Protection of the Marine Environment of the North-East Atlantic. OSPAR List of Threatened and/or Declining Species and Habitats.
Nat Legislation	PBA	Protection of Badgers Act 1992	An Act to consolidate the Badgers Act 1973, the Badgers Act 1991 and the Badgers (Further Protection) Act 1991. Prohibits the wilful injuring, killing or taking of badgers, except as permitted by or under the Act.
Nat Legislation	Sect.41	Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec	Species “of principal importance for the purpose of conserving biodiversity” covered under section 41 (England) of the NERC Act (2006) and therefore need to be taken into consideration by a public body when performing any of its functions with a view to c
Nat Legislation	HabRegs2	The Conservation (Natural Habitats, &c.) Regulations 2010 (Schedule 2)	Schedule 2- European protected species of animals.
Nat Legislation	HabRegs4	The Conservation (Natural Habitats, &c.) Regulations 2010 (Schedule 4)	Schedule 4- Animals which may not be taken or killed in certain ways
Nat Legislation	HabRegs5	The Conservation (Natural Habitats, &c.) Regulations 2010 (Schedule 5)	Schedule 5- European protected species of plants.
Nat Legislation	ScotBL	Scottish Biodiversity List of species of principal importance for biodiversity conservation	The Scottish Biodiversity List is a list of flora, fauna and habitats considered by the Scottish Ministers to be of principal importance for biodiversity conservation. The development of the list has been a collaborative effort involving a great many stak
Nat Legislation	WO1i	The Wildlife (Northern Ireland) Order 1985 (Schedule 1 Part 1)	Birds which are protected by special penalties at all times.
Nat Legislation	WO1ii	The Wildlife (Northern Ireland) Order 1985 (Schedule 1 Part 2)	Birds which are protected by special penalties during the close season.
Nat Legislation	WO2i	The Wildlife (Northern Ireland) Order 1985 (Schedule 2 Part 1)	Birds which may be killed or taken outside the close season.
Nat Legislation	WO2ii	The Wildlife (Northern Ireland) Order 1985 (Schedule 2 Part 2)	Birds which may be killed or taken by authorised persons at all times. This has now been deleted and no longer applies: the provision of this part is covered by General Licences issued annually.
Nat Legislation	WO3	The Wildlife (Northern Ireland) Order 1985 (Schedule 3)	Birds which may be sold dead at all times.
Nat Legislation	WO4	The Wildlife (Northern Ireland) Order 1985 (Schedule 4)	Birds which may be shown for competitive purposes.

Nat Legislation	WO5	The Wildlife (Northern Ireland) Order 1985 (Schedule 5)	Animals which are protected at all times.
Nat Legislation	WO6	The Wildlife (Northern Ireland) Order 1985 (Schedule 6)	Animals which may not be killed or taken by certain methods.
Nat Legislation	WO7	The Wildlife (Northern Ireland) Order 1985 (Schedule 7)	Animals which may be sold alive or dead at any time.
Nat Legislation	WO8i	The Wildlife (Northern Ireland) Order 1985 (Schedule 8 - Part 1)	Plants which are protected from intentional picking, removal or destruction and from selling (in whole or part) and from advertising for sale.
Nat Legislation	WO8ii	The Wildlife (Northern Ireland) Order 1985 (Schedule 8 - Part 2)	Plants which may not be sold.
Nat Legislation	WO9i	The Wildlife (Northern Ireland) Order 1985 (Schedule 9 - Part 1)	Animals which established in the wild but may not be released from captivity.
Nat Legislation	WO9ii	The Wildlife (Northern Ireland) Order 1985 (Schedule 9 - Part 2)	Plants which may not be caused to grow in the wild.
Nat Legislation	WCA1i	Wildlife and Countryside Act 1981 (Schedule 1 Part 1)	Birds which are protected by special penalties at all times.
Nat Legislation	WCA1ii	Wildlife and Countryside Act 1981 (Schedule 1 Part 2)	Birds which are protected by special penalties during the close season.
Nat Legislation	WCA2i	Wildlife and Countryside Act 1981 (Schedule 2 Part 1)	Birds which may be killed or taken outside the close season.
Nat Legislation	WCA2ii	Wildlife and Countryside Act 1981 (Schedule 2 Part 2)	Birds which may be killed or taken by authorised persons at all times.
Nat Legislation	WCA3i	Wildlife and Countryside Act 1981 (Schedule 3 Part 1)	Birds which may be sold alive at all times if ringed and bred in captivity.
Nat Legislation	WCA3ii	Wildlife and Countryside Act 1981 (Schedule 3 Part 2)	Birds which may be sold dead at all times.
Nat Legislation	WCA3iii	Wildlife and Countryside Act 1981 (Schedule 3 Part 3)	Birds which may be sold dead from 1st September to 28th February.
Nat Legislation	WCA4	Wildlife and Countryside Act 1981 (Schedule 4)	Birds which must be registered and ringed if kept in captivity.
Nat Legislation	WCA5/9.1(kill/injuring)	Wildlife and Countryside Act 1981 (Schedule 5 Section 9.1 (killing/injuring))	Section 9.1. Animals which are protected from intentional killing or injuring.
Nat Legislation	WCA5/9.1(taking)	Wildlife and Countryside Act 1981 (Schedule 5 Section 9.1 (taking))	Section 9.1 Animals which are protected from taking.
Nat Legislation	WCA5/9.2	Wildlife and Countryside Act 1981 (Schedule 5 Section 9.2)	Section 9.2 Animals which are protected from being possessed or controlled (live or dead).
Nat Legislation	WCA5/9.4a	Wildlife and Countryside Act 1981 (Schedule 5 Section 9.4a)	Section 9.4 Animals which are protected from intentional damage or destruction to any structure or place used for shelter or protection.
Nat Legislation	WCA5/9.4b	Wildlife and Countryside Act 1981 (Schedule 5 Section 9.4b)	Section 9.4 Animals which are protected from intentional disturbance while occupying a structure or place used for shelter or protection.
Nat Legislation	WCA5/9.5a	Wildlife and Countryside Act 1981 (Schedule 5 Section 9.5a)	Section 9.5 Animals which are protected from being sold, offered for sale or being held or transported for sale either live or dead, whole or part.
Nat Legislation	WCA5/9.5b	Wildlife and Countryside Act 1981	Section 9.5 Animals which are protected from being published or advertised as being for sale.

		(Schedule 5 Section 9.5b)	
Nat Legislation	WCA5/9.4A*	Wildlife and Countryside Act 1981 (Schedule 5)	Ceteaca/basking shark that are not allowed to be intentionally or recklessly disturbed.
Nat Legislation	WCA5/9.4c	Wildlife and Countryside Act 1981 (Schedule 5)	Animals which are protected from their access to any structure or place which they use for shelter or protection being obstructed.
Nat Legislation	WCA6	Wildlife and Countryside Act 1981 (Schedule 6)	Animals which may not be killed or taken by certain methods.
Nat Legislation	WCA8	Wildlife and Countryside Act 1981 (Schedule 8)	Plants which are protected from intentional picking, uprooting or destruction (Section 13 1a); selling, offering for sale, possessing or transporting for the purpose of sale (live or dead, part or derivative) (Section 13 2a); advertising (any of these) fo
Nat Legislation	WCA9i	Wildlife and Countryside Act 1981 (Schedule 9 Part 1)	Animals which may not be released or allowed to escape into the wild.
Nat Legislation	WCA9ii	Wildlife and Countryside Act 1981 (Schedule 9 Part 2)	Plants which may not be planted or caused to grow in the wild.
Nat Legislation	Sect.42	Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in Wales (secti	Species “of principal importance for the purpose of conserving biodiversity” covered under Section 42 (Wales) of the NERC Act (2006) and therefore need to be taken into consideration by a public body when performing any of its functions with a view to con
New NBIS List	Breck_Special	Breckland Specialists	Species identified as Breckland specialits by the Breckland Biodiversity audit 2010
New NBIS List	NRPl	Norfolk Rare Plants	Norfolk rare plants as identified by BSBI County recorder Bob Ellis
Other rare/scarce	FEP1	Farm Environment Plan Guidance 001	Species is listed in the DEFRA document 'Environmental Stewardship Farm Environment Plan Guidance 001: Hedgerow Woody Species (from Schedule 3 of Hedgerow Regulations 1997)'.
Other rare/scarce	FEP7/2	Farm Environment Plan Guidance 007- Table 2	Species is listed in 'Table 2: Farm Environment Plan Species to be recorded in Part 2 of the FEP' of the DEFRA document 'Environmental Stewardship Farm Environment Plan Guidance 007: Plant & animal species in the Farm Environment Plan (FEP)'.
Other rare/scarce	FEP7/3	Farm Environment Plan Guidance 007- Table 3	Species is listed in 'Table 3: High Value Arable Margin Indicator Species' of the DEFRA document 'Environmental Stewardship Farm Environment Plan Guidance 007: Plant & animal species in the Farm Environment Plan (FEP)'.
Other rare/scarce	NRMar	Nationally rare marine species	Species which occur in eight or fewer 10km X 10km grid squares containing sea (or water of marine saline influence) within the three mile territorial limit.
Other rare/scarce	NSMar	Nationally scarce marine species	Species which occur in nine to 55 10km X 10km grid squares containing sea (or water of marine saline influence) within the three mile territorial limit.
Other rare/scarce	N	Nationally Notable	Species which are estimated to occur within the range of 16 to 100 10km squares. (subdivision into Notable A and Notable B is not always possible because there may be insufficient information available). Superseded by Nationally Scarce, and therefore no l
Other rare/scarce	NA	Nationally Notable A	Taxa which do not fall within RDB categories but which are none-the-less uncommon in Great Britain and thought to occur in 30 or fewer 10km squares of the National Grid or, for less well-recorded groups, within seven or fewer vice-counties. Superseded by
Other rare/scarce	NB	Nationally Notable B	Taxa which do not fall within RDB categories but which are none-the-less uncommon in Great Britain and thought to occur in between 31 and 100 10km squares of the National Grid or, for less-well recorded groups between eight and twenty vice-counties. Super
Other	NR-excludes	Nationally rare. Excludes Red Listed	Occurring in 15 or fewer hectads in Great Britain. Excludes rare species qualifying under the main IUCN

rare/scarce		taxa	criteria.
Other rare/scarce	NS-excludes	Nationally scarce. Excludes Red Listed taxa	Occurring in 15 or fewer hectads in Great Britain. Excludes rare species qualifying under the main IUCN criteria.
Red Data List	BAmb	Bird Population Status - amber	Amber list species are those with an unfavourable conservation status in Europe; those whose population or range has declined moderately in recent years; those whose population has declined historically but made a substantial recent recovery; rare breeder
Red Data List	BRed	Bird Population Status - red	Red list species are those that are Globally Threatened according to IUCN criteria; those whose population or range has declined rapidly in recent years; and those that have declined historically and not shown a substantial recent recovery.
Red Data List	RLGB.CR	IUCN (2001) - Critically endangered	A taxon is Critically Endangered when it is facing an extremely high risk of extinction in the wild in the immediate future, as defined by any of the criteria A to E.
Red Data List	RLGB.DD	IUCN (2001) - Data Deficient	A taxon is Data Deficient when there is inadequate information to make a direct, or indirect, assessment of its risk of extinction based on its distribution and/or population status. A taxon in this category may be well studied, and its biology well known
Red Data List	RLGB.EN	IUCN (2001) - Endangered	A taxon is Endangered when it is not Critically endangered but is facing a very high risk of extinction in the wild in the near future.
Red Data List	RLGB.EW	IUCN (2001) - Extinct in the wild	A taxon is Extinct in the wild in Great Britain when it is known to survive only in cultivation, in captivity or as a naturalised population (or populations) well outside the past range. A taxon is presumed extinct in the wild when exhaustive surveys in k
Red Data List	RLGB.EX	IUCN (2001) - Extinct	A taxon is Extinct in Great Britain when there is no reasonable doubt that the last individual in Great Britain has died. A taxon is presumed extinct when exhaustive surveys in known and/or expected habitat, at appropriate times (diurnal, seasonal, annual
Red Data List	RLGB.NT	IUCN (2001) - Lower risk - near threatened	Taxa which do not qualify for Lower Risk (conservation dependent), but which are close to qualifying for Vulnerable. In Britain, this category includes species which occur in 15 or fewer hectads but do not qualify as Critically Endangered, Endangered or V
Red Data List	RLGB.RE	IUCN (2001) - Regionally Extinct	Category for a taxon when there is no reasonable doubt that the last individual potentially capble of reproduction within the region has died or has disappeared from the wild in the region, or when, if it is a former visiting taxon, the last individual ha
Red Data List	RLGB.VU	IUCN (2001) - Vulnerable	A taxon is Vulnerable when it is not Critically Endangered or Endangered but is facing a high risk of extinction in the wild in the medium term future.
Red Data List	RLGB.CR	IUCN (1994) - Critically endangered	A taxon is Critically Endangered when it is facing an extremely high risk of extinction in the wild in the immediate future, as defined by any of the criteria A to E.
Red Data List	RLGB.DD	IUCN (1994) - Data Deficient	A taxon is Data Deficient when there is inadequate information to make a direct, or indirect, assessment of its risk of extinction based on its distribution and/or population status. A taxon in this category may be well studied, and its biology well known
Red Data List	RLGB.EN	IUCN (1994) - Endangered	A taxon is Endangered when it is not Critically endangered but is facing a very high risk of extinction in the wild in the near future.
Red Data List	RLGB.EX	IUCN (1994) - Extinct	Taxa which are no longer known to exist in the wild after repeated searches of their localities and other known likely places.Superseded by new IUCN categories in 1994, but still applicable to lists that have not been reviewed since 1994.
Red Data List	RLGBLr(NT)	IUCN (1994) - Lower risk - near threatened	Taxa which do not qualify for Lower Risk (conservation dependent), but which are close to qualifying for Vulnerable. In Britain, this category includes species which occur in 15 or fewer hectads but do not qualify as Critically Endangered, Endangered or V
Red Data List	RLGB.VU	IUCN (1994) - Vulnerable	A taxon is Vulnerable when it is not Critically Endangered or Endangered but is facing a high risk of

			extinction in the wild in the medium term future.
Red Data List	RDBGB.EN	IUCN (pre 1994) - Endangered	Taxa in danger of extinction and whose survival is unlikely if the causal factors continue operating. Superseded by new IUCN categories in 1994, but still applicable to lists that have not been reviewed since 1994.
Red Data List	RDBGB.EX	IUCN (pre 1994) - Extinct	Taxa which are no longer known to exist in the wild after repeated searches of their localities and other known likely places.Superseded by new IUCN categories in 1994, but still applicable to lists that have not been reviewed since 1994.
Red Data List	RDBGB.Inde	RDB - Indeterm	Taxa not seen since 1970 but require further survey before they can be declared extinctknown to be Extinct, Endangered, Vulnerable or Rare, but where there is not enough information to say which of these categories is appropriate. Superseded by new IUCN c
Red Data List	RDBGB.Insu	RDB - Insuff known	Taxa that are suspected but not definitely known to belong to any of the above categories (i.e. Endangered, Vulnerable, Rare), because of the lack of information. Superseded by new IUCN categories in 1994, so no longer in use.
Red Data List	RDBGB.R	IUCN (pre 1994) - Rare	Taxa with small populations that are not at present Endangered or Vulnerable, but are at risk. (In GB, this was interpreted as species which exist in fifteen or fewer 10km squares). Superseded by new IUCN categories in 1994, but still applicable to lists
Red Data List	RDBGB.Thre	RDB - Threatened endemic	Taxa which are not known to occur naturally outside Britain. Taxa within this category may also be in any of the other RDB categories or not threatened at all.
Red Data List	RDBGB.VU	IUCN (pre 1994) - Vulnerable	Taxa believed likely to move into the Endangered category in the near future if the causal factors continue operating. Superseded by new IUCN categories in 1994, but still applicable to lists that have not been reviewed since 1994.
Red Data List	RLGLB.CR	IUCN (2001) - Critically endangered	A taxon is Critically Endangered when the best available evidence indicates that it meets any of the criteria A to E for Critically Endangered (see Section V), and it is therefore considered to be facing an extremely high risk of extinction in the wild.
Red Data List	RLGLB.EN	IUCN (2001) - Endangered	A taxon is Endangered when the best available evidence indicates that it meets any of the criteria A to E for Endangered (see Section V), and it is therefore considered to be facing a very high risk of extinction in the wild.
Red Data List	RLGLB.VU	IUCN (2001) - Vulnerable	A taxon is Vulnerable when the best available evidence indicates that it meets any of the criteria A to E for Vulnerable (see Section V), and it is therefore considered to be facing a high risk of extinction in the wild.
Red Data List	RLGLB.DD	IUCN (2001) - Data Deficient	A taxon is Data Deficient when there is inadequate information to make a direct, or indirect, assessment of its risk of extinction based on its distribution and/or population status. A taxon in this category may be well studied, and its biology well known
Red Data List	RLGLB.EX	IUCN (2001) - Extinct	A taxon is Extinct when there is no reasonable doubt that the last individual has died. A taxon is presumed Extinct when exhaustive surveys in known and/or expected habitat, at appropriate times (diurnal, seasonal, annual), throughout its historic range h
Red Data List	RLGLB.NT	IUCN (2001) - Lower risk - near threatened	A taxon is Near Threatened when it has been evaluated against the criteria but does not qualify for Critically Endangered, Endangered or Vulnerable now, but is close to qualifying for or is likely to qualify for a threatened category in the near future.
Red Data List	RLGLB.CR	IUCN (1994) - Critically endangered	A taxon is Critically Endangered when it is facing an extremely high risk of extinction in the wild in the immediate future, as defined by any of the criteria A to E.
Red Data List	RLGLB.DD	IUCN (1994) - Data Deficient	A taxon is Data Deficient when there is inadequate information to make a direct, or indirect, assessment of its risk of extinction based on its distribution and/or population status. A taxon in this category may be well studied, and its biology well known
Red Data List	RLGLB.EN	IUCN (1994) - Endangered	Taxa in danger of extinction and whose survival is unlikely if the causal factors continue operating.

			Superseded by new IUCN categories in 1994, but still applicable to lists that have not been reviewed since 1994.
Red Data List	RLGLB.LR(cd)	IUCN (1994) - Lower risk - conservation dependent	Taxa which are the focus of a continuing taxon-specific or habitat-specific conservation programme targeted towards the taxon in question, the cessation of which would result in the taxon qualifying for one of the threatened categories above within a peri
Red Data List	RLGLB.NT	IUCN (1994) - Lower risk - near threatened	Taxa which do not qualify for Lower Risk (conservation dependent), but which are close to qualifying for Vulnerable. In Britain, this category includes species which occur in 15 or fewer hectads but do not qualify as Critically Endangered, Endangered or V
Red Data List	RLGLB.VU	IUCN (1994) - Vulnerable	Taxa believed likely to move into the Endangered category in the near future if the causal factors continue operating. Superseded by new IUCN categories in 1994, but still applicable to lists that have not been reviewed since 1994.
UK BAP	UKBAP	UK Biodiversity Action Plan priority species	The UK List of Priority Species and Habitats contains 1150 species and 65 habitats that have been listed as priorities for conservation action under the UK Biodiversity Action Plan (UK BAP).

REPORT ENDS

Appendix 2

Preliminary Ecological Assessment

ANGLIAN ECOLOGY

PROTECTED SPECIES AND HABITAT SURVEYS





PRELIMINARY ECOLOGICAL APPRAISAL

Land at:

Jeskyns Farm

Jeskyns Road

Gravesend

Kent

REPORT FOR:

Duncan Slade MRICS

Assistant Area Land Agent

Forestry England

East England Forest District Office

DATE OF FIELD SURVEY:

17.09.2021

REPORT WRITTEN BY:

S. Morgan

CHECKED BY:

FM:18.10.2021

REGISTERED ADDRESS:

1, Red House Farm Cottages, Pixey Green, Stradbroke, Eye, Suffolk, IP21 5NJ

CONTACT PHONE:

07753 406 866

CONTACT EMAIL:

sue@anglianecology.co.uk

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Preliminary Ecological Appraisal of: Land at Jeskyns Farm, Gravesend, Kent

Recipients: Duncan Slade MRICS, Assistant Area Land Agent, Forestry England, East England Forest District Office

Please note:

Records form a vital part of conservation work and potentially inform decisions within the wider area. In line with good practice, all recordings of protected species found during this site survey will be given to the relevant county recording service within one week of report issue, unless specific instructions to the contrary are received within this timeframe from the client.

Ecosystems and wildlife species are constantly changing and moving and can be dependent on surrounding impacts and climate conditions. Therefore, any field survey, no matter how thoroughly undertaken, can only represent a 'snapshot' of conditions at the time of visit.

If in doubt as to wildlife or protected species issues, seek advice from a suitably qualified ecologist, as the legislature will not accept ignorance as defence. All site owners and contractors should make themselves aware of their legal obligations concerning species and habitats.

A précis of the current legislation as it may apply to this site is contained within the Appendix of this report, but whilst every effort has been made to include relevant legislation the information is not fully comprehensive. For full details of legislation regarding protected species and sites clients should visit: https://www.gov.uk/topic/planning-development/protected-sites-species http://www.legislation.gov.uk/ Natural England is the government's advisor on the natural environment and provides a range of information including regional contact details on their website: https://www.gov.uk/government/organisations/natural-england/services-information

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The information that I have prepared and provided is true and has been prepared in accordance with the guidance of my professional institutes.

I therefore confirm that the opinions expressed are my true and professional opinions.

[redacted]

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The approximate area of land surveyed is outlined in red on the photograph below. It measures approximately 3574m².

Th area surveyed is shaded over below. The proposed site is indicated by the red rectangle on the satellite photograph.





Site Proposals:

The proposal is to create a purpose-built facility to support the operational forestry work of Forestry England in managing this site and surrounding parts of the forest estate by providing mess facilities and administration space of approximately 195m2 of floor space. The exact siting is subject to confirmation but is expected to be close to that as indicated on the plans as detailed below.

Plans provided by the client before survey include:

1.Jeskyns – Site Working Area, Scale 1:500, Duncan Slade, 06-08-2021

2. Jeskyns Location Plan, Scale 1:1,250, Duncan Slade 13-08-2021

Summary

Mr. Duncan Slade, Assistant Area Land Agent, Forestry England, East England Forest District Office, commissioned Anglian Ecology to conduct a Preliminary Ecological Appraisal (PEA) of land within the Forestry England site at Jeskyns Farm, Gravesend, Kent in connection with a proposal to construct a new office building on an area consisting largely of compacted hardcore and stone materials to the northeast section of the site as indicated on the accompanying architects plans. Qualified surveyor Sue Morgan conducted the PEA of the proposed site area and its immediate surroundings Friday 17th September 2021, following the appropriate guidelines.[1]

PEA is the term used to describe a rapid assessment of the ecological features present, or potentially present, within a site and its surrounding area (the zone of influence[2]) in relation to a specific project.[3] This PEA is comprised of a desk study and a walkover survey. Due to the small scale of the proposals, a zone of 2km from the centre of the site was set for the gathering of information for the desk study, and the area within the red line boundary was considered sufficient extent for the Phase 1 Habitat Survey.

A brief inspection of the large barns on site was undertaken with reference to whether there might be any evidence of bat roosts within them in areas where the proposed works or any new lighting may affect this species if present. No evidence of bat usage was found. The survey also included a walkover of all the existing former grain silo areas, particularly the four silos immediately to the east of the proposed new building which may be dismantled and removed, again, no evidence of protected species was found in these silo areas.

Forestry England obtained records for protected species and sites, birds, and invasive species from Kent and Medway Biological Record Office. There are 181 records of protected species within a 2km radius of the site and 1327 records for birds. No records pertain directly to the site area. There are three equidistant records for different species all from 150m away: Grass snake *(Natrix helvetica),* dated 2020, to the northeast, common frog *(Rana temporaria),* dated 2012 to the northeast, and common pipistrelle *(Pipistrellus pipistrellus)* to the south, dated 2007.

Other records within the 2km search radius undertaken in house by Forestry England are for brown hare *(Lepus Europaeus)*, flowering plants, badger *(Meles meles),* common toad *(Bufo bufo),* moth, butterfly, hedgehog *(Erinaceus europaeus)*, adder *(Vipera berus),* at least six species of bat, 56 records for dormouse *(Muscardinus avellanarius),* and at one old record for great crested newt *(Triturus cristatus).*

No evidence of protected species was found on site or within the area of proposed works from the site walkover. The majority of the site consists of hardstanding, driveways, and former agricultural buildings, with grain silo arrays to the east and south of the main barns. However, there is a narrow belt of woodland to the south and southeast of the survey area in which species include mature beech *(Fagus sylvatica),* yew *(Taxus baccata),* field maple *(Acer campestre),* hazel *(Corylus avellana)*, and silver birch *(Betula pendula).* There are also areas of improved grassland and tall ruderals.

Close to the site lie species -rich hedgerows, and bands of woodland bordering the site to the north, west, and east. These areas will be habitat for protected species such as bats and small mammals. In addition, there is a pond 80m to the west of the proposed site area, located in woodland beyond the west site boundary, and approximately 90m to the north of the site lies Henhurst Lake and a further lake, to the northeast. The site has ecological continuity with Jeskyns Community Woodland area. Both reptiles and amphibians will be utilising the margins of the site, and it is possible that they may be within the proposed area of works from time to time, however, given the existing terrain the likelihood of harm to these species is considered a very low if the requirements of this report are adhered to.

It is understood that the proposals do not necessitate the removal or pruning of any trees or hedgerows. Should this situation change, further surveys for bats, dormice, and breeding birds must be undertaken prior to works.

Currently the proposed works are relatively minor in scale and confined to areas of low impact (i.e. existing hardstanding or short grass), and foundations are shallow, it is therefore considered that the construction of the new office and associated services will have a minimal impact of the biodiversity and very low potential impact on any protected species so long as the recommendations within this report are followed. The proposals may require the removal (by dismantling) of the four silos to the immediate west of the site area. This area and the silos were searched, and no evidence of protected species or likely habitat was found within the silos or the immediate area around them.

The site lies within the SSSI Impact Zones[4] of Shorne and Ashenbank Woods SSSI 800m to the east, Cobham woods SSSI 2.1km to the east, Great Crabbles Wood SSSI 3.9km to the northeast. It also lies 400m to the east of the Kent Downs Area of Outstanding Natural Beauty. The site is part of the Green Belt around Gravesend. The proposed works will not impact in any of these sites.

Recommendations about best working practise, together with legislation regarding protected species and sites are enclosed within the body of the report.

[1] The Guidelines for Preliminary Ecological Appraisal' (2nd edition, 2017) produced by the Professional Standards Committee of the Chartered Institute of Ecology and Environmental Management (CIEEM), CIEEM Professional Guidelines Series publications, together with those published for individual species surveys by specialist organisations such as The Bat Conservation Trust, The Mammal Society, and Natural England

[2] The area(s) over which ecological features may be affected by the biophysical changes caused by a proposed project and associated activities.

[3] Definition taken from 'The Guidelines for Preliminary Ecological Appraisal' (2nd edition, 2017) produced by the Professional Standards Committee of the Chartered Institute of Ecology and Environmental Management (CIEEM).

[4] SSSI Impact Zone SSSI Impact Risk Zones - to assess planning applications for likely impacts on SSSIs/SACs/SPAs & Ramsar sites

Summary of further actions/ survey requirements

Habitat/Species	Action	Enhancement Opportunity
All	Appointment of Ecological Clerk of Works for this site prior to development start. The EcoW will provide a Reasonable Avoidance Method Statement (RAMS) which will detail best practice working methodology and reasonable avoidance measures to be in place on site throughout the duration of works. The EcoW will also be responsible for agreeing exclusion zones, supervising vegetation removal, and delivering Toolbox Talks to contractors, as well as ensuring any mitigation/ compensation and enhancement measures are fulfilled.	**There are opportunities for site enhancement of both the wider site, and the proposed new office area which are species specific. Please see below, and the relevant section of the report for further details.**
Bats	The site boundaries are eminently suitable for bat species, as are the agricultural buildings to the west boundary. No species specific surveys were carried out, but a brief inspection of the barns bordering the proposed site area revealed no evidence of bat presence. The site should remain a dark site at night both before, during, and after works. It is understood that no trees will be removed to facilitate works, should this situation change, then any tree to be removed would require a Potential Bat Roost Assessment.	**The new building should have two bat boxes installed to the exterior, on aspects sheltered from strong winds and exposed to the sun for part of the day (usually south, south-east or south-west).**
Reptiles	The site contains some limited habitat for reptiles and grass snake has been recorded in the data search results. An EcoW presence is required to search any areas of low vegetation removal prior to works. **RAMS Methodology must be followed.**	**An enhancement for the site would be the creation of brash/log piles placed on grassland to the southeast of the existing portacabin. These can be created from arisings of scrub control. Piles should be placed in a sunny location and set within existing vegetation (for example, areas of long grass or long grass and scattered scrub), so that there is cover immediately surrounding, or adjacent to, the pile. Areas of this grassland could be mown, or small patches cleared to 'hot spots' (foci).**
Hedgehogs/ small mammals/frogs/toads	The EcoW should remain on site during works to any potentially wildlife-sensitive areas such as removal of tall ruderals. **RAMS Methodology must be followed.**	**Areas of long vegetation should be retained wherever possible. Two hedgehog boxes should be provided to the woodland (south) boundary of the proposed office area, away from car parking.**
Birds	There are records of ground nesting birds within the search radius, but these are unlikely to be present within the search radius. If works are scheduled between March – September, then the EcoW should undertake a check of the site area to ensure no ground nesting birds are present. These species, together with others may well be present on site and no tree removal must take	**At least four bird boxes should be installed on site, two to be available for use by song thrush (*Turdus philomenus)* one for house sparrow *(Passer domesticus)* (both UK BAP/ Priority Species), and a fourth for swift *(Apus apus).* These should be located within the site area. These could be affixed to existing buildings or the new office building.**
Invertebrates	There are records of invertebrates within the search radius, within the search radius. A very minimal amount of invertebrate habitat will be lost as a result of these proposals. The appointed ECoW should ensure contractors are aware of disturbance to potential invertebrate habitat particularly among the small amount of tall ruderal areas which may be impacted upon. **RAMS Methodology must be followed.**	**The creation of a second ' bug hotel' on site (there exists one to the barn wall located on the west boundary) would be an enhancement for invertebrates amidst the predominately hardstanding areas of the site.**
Area of improved grass and tall ruderals, small areas of scrub.	Removal of any tall ruderals and longer grass clearance should be supervised by the ECoW immediately before works commence to avoid the potential for harm/disturbance to small mammals such as hedgehog, as above. **RAMS Methodology must be followed.**	**There will be minimal loss of this habitat.** **An enhancement for the site would be the seeding of native pollen-rich plants to the site area margins, this would benefit invertebrates and therefore bat species.**
Trees	Any trees close to the areas of works will need root protection in accordance with BS5837:2012 Trees in relation to design, demolition, and construction which site contractors must follow. Any removal or pruning of trees will require further survey, as above.	

1. Personnel

Sue Morgan is a Chartered Ecologist and Chartered Environmentalist and qualified botanical surveyor, with over 21 years' experience of surveying similar sites, structures and protected species habitats.

She works on projects for the Church of England, the National Trust, County and District Councils, the Suffolk Wildlife Trust, multi-national engineering consultancies, and private landowners. She is a Natural England licenced Volunteer Bat Roost Visitor and holds Natural England licenses to survey for protected species.

She is a qualified teacher and delivers training courses for adults on ecological surveying, woodland management, and protected species, please visit: www.anglianecology.co.uk for more information.

She is a Chartered Member of the Institute of Ecology & Environmental Management (MCIEEM) and a past Convener of its East of England Section, and a Chartered member of the Institute of Environmental Management (MIEMA).

NATURAL ENGLAND LICENCES:

Natural England Licence Holder for the Surveying of Barn Owls Number CL29/00106.

Natural England Licence Holder Class Licence CL18 Registration number: 2015-11320-CLS-CLS for the surveying & handling of bats in all counties of England.

Natural England Survey Class Licence WML-CL08 Registration number 2015-19101-CLS-CLS. (great crested newts).

Natural England Survey Class Licence holder 2016-21569-CLS-CLS (dormice).

BIOLOGICAL SURVEYING:

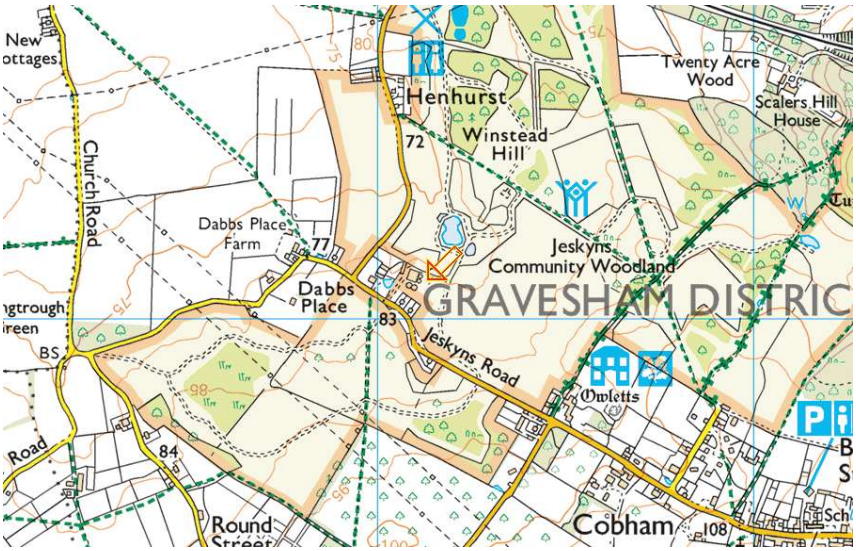
Advanced Certificate in Biological Surveying from The University of East Anglia and The Field Studies Council.

2 Location

NGR at Site centre: TQ 66122 69114

Address: Jeskyns Farm Jeskyns road, Gravesend, DA12 3AL

Location is marked by the red arrow on the map below



3 Methodology

This report is written with reference to:

The British Standard BS 42020:2013, Biodiversity a Code of Practice for Planning and Development (BSI[5] 2013).

As a full member of the Chartered Institute of Ecology & Environmental Management (CIEEM) and of the Institute of Environmental Management the author of this report followed the institutes Codes of Professional Conduct and Technical Guidelines, including CIEEM's Sources of Survey Methods, whilst conducting the field survey and compiling the accompanying written report of findings.

All examination for protected species and habitats was undertaken using the standard guidelines for the individual species e.g. The Bat Conservation Trust: Bat Surveys - Good Practice Guidelines (3rd edition 2016).

The Phase I Habitat survey was undertaken using the 'Handbook for Phase 1 habitat survey - a technique for environmental audit' JNCC, 2016.

Plant species nomenclature follows that of Stace[6] (2019).

3.1 Phase One Survey

A Phase I Survey was undertaken of the area within the red line boundary in the photograph in Figure 1 above. Within this area a field search was undertaken for signs of protected species, or their potential habitat and the area was recorded following the standard Phase I survey methodology.

3.2 Zone of Influence

The appropriate Zone of Influence for the desktop survey was set at 2km, and analysis of all records of protected species and sites within this radius was undertaken using DEFRA's MAGIC MAP, information supplied by the client, and information supplied from a 2km search radius by Forestry England from Kent and Medway Biological Record Office. An assessment of their relevance in relation to the impact of proposed development in the site area follows below.

3.3. Risk Assessment/Access to Survey

A risk assessment was undertaken prior to the field survey. There were no risks other than those usually encountered when surveying out of doors. Parking is available on site.

[5] British Standards Institute
[6] Stace; C. New Flora of the British Isles, C&M Floristics, 4th Edition, 2019

3.4 Protected Species and Sites, data search details

Forestry England obtained records for all protected species and statutory sites within a 2km radius from Kent and Medway Biological Information Service. Ownership of the data remains with the original recorder and SBIS. The data search was returned on 17/09/2021; all data use restrictions apply.

All protected sites, Priority Habitats, and areas of local or regional conservation importance within a 2 km radius have been assessed within the Geographic Frame of Reference[7] which is comprised of seven levels:

• International; • UK; • National (i.e. England/Northern Ireland/Scotland/Wales); • Regional/ County (or Metropolitan - e.g. in London); • District/ (or Unitary Authority, City, or Borough); • Local or Parish; • within zone of influence only (which might be the project site or a larger area).

No sites of International, national, regional, county, or district importance will be affected by the proposals for the demolition of the existing office, or for the construction and facilitation works for the new one.

Brief details of sites and Priority Habitats are detailed below. A map showing the result of the MAGIC Map search for a radius of 2km is included in the appendix.

[7] Geographic Frame of Reference, Guidelines for Ecological Impact Assessment in the UK, CIEEM, 2006

4. Legislation

This PEA has been undertaken with reference to relevant wildlife legislation and planning policy.

Relevant legislation considered within the scope of this document includes the following:

- The Wildlife and Countryside Act 1981 (as amended).
- The Conservation of Habitats and Species Regulations 2017 (as amended).
- Natural Environment and Rural Communities (NERC) Act 2006.
- The Countryside and Rights of Way (CRoW) Act 2000.
- Wild Mammals (Protection) Act 1996.
- The Hedgerow Regulations (1997).
- The Protection of Badgers Act (1992)

In addition to obligations under wildlife legislation, a new version of the National Planning Policy Framework was published on 20 July 2021, this sets out the government's planning policies for England and how these are expected to be applied. Chapter 2 'Achieving sustainable development', members of the United Nations – including the United Kingdom – have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection[8]. The environmental objective is to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. Chapter 15: 'Conserving and enhancing the natural environment' sets out how requires planning decisions must contribute to conserving and enhancing the local environment.

The 'UK Post-2010 Biodiversity Framework', published in July 2012, succeeded the UK BAP[9]. The framework particularly set out the priorities for UK-level work to support the Convention on Biological Diversity's (CBD's) Strategic Plan for Biodiversity 2011-2020 and the EU Biodiversity Strategy (EUBS), launched in May 2011. Many of the outputs originally developed under the UK BAP remain valid and of use. Background information on UK Priority Habitats (HAPs) and species (BAPs) still inform biodiversity work at country level and are a point of reference for targeted conservation efforts.

[8] Transforming our World: the 2030 Agenda for Sustainable Development.

[9] Biodiversity Action Targets UK BAP priority species and habitats were those that were identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan (UK BAP). The original lists of UK BAP priority species and habitats were created between 1995 and 1999 and were subsequently updated in 2007.

5. Desktop Survey

5.1. History

So far as the author of this report is aware there have been no previous ecological surveys carried out on this site.

5.2 Hydrological Information

Aquifer Designation Map (Bedrock) (England)

Typology: Principal

Aquifer Designation Map (Superficial Drift) (England)

Typology: Secondary (undifferentiated)

The average rainfall is 2.6 mm

5.3 Geological Information

Soilscape (England)

Reference: 5

Name: FREELY DRAINING LIME-RICH LOAMY SOILS

Main Surface Texture Class: LOAMY

Natural Drainage Type: FREELY DRAINING

Natural Fertility: LIME-RICH

Characteristic Semi-natural Habitats: HERB-RICH CHALK AND LIMESTONE PASTURES; LIME-RICH DECIDUOUS WOODLANDS

Main Land Cover: ARABLE AND GRASSLAND

5.4 Protected or notable sites

1. SSSI Sites and SSSI Impact Zones

1 Shorne and Ashenbank Woods SSSI 800m to the east

Reference:1000322, Hectares:197.44, Citation: 1001250

The site lies within the SSSI Impact Risk Zones of the above woodland, and the Impact Zones of Cobham woods SSSI 2.1km to the east, Great Crabbles Wood SSSI 3.9km to the northeast.

2. Ramsars, AONB's SAC's, and SPA's and other sites with statutory protection

1. Areas of Outstanding Natural Beauty (England) 400m to the east

Reference: 18, Name: Kent Downs, Statutory Area in Sq.km; 879

3. Priority Habitat Inventory

The following Priority Habitats are within 2km of the site, in each case the nearest example is given. All ancient woodland is listed.

1. Ancient Semi-Natural Woodland

1.1 Shorne and Ashenbank Woods 800m to the east

1.2 Claylane Wood 1.1km to the north.

1.3 Cobhambury Wood 1.9km to the southeast

1.4 Cozenden Wood 1.3km to the west

2. Deciduous woodland, Twenty Acre Wood 900m to the northeast

3. National Forest Inventory, Category: Woodland, Interpreted Forest Type: Broadleaved, 65m to the south

4. Traditional Orchards 65m to the south.

5. No main habitat but additional habitat exists (FEP features: G04: Lowland calcareous grassland)

1.6km to the west

1. CWS Number: Suffolk Coastal 202, Site Name: OAK WOOD, as above, 1.4km to the northeast

2. CWS Number: Suffolk Coastal 37, Site Name: WATER WOOD 1.6km to the northeast

4. Green Belt

London Area Greenbelt, Local Authority: Gravesham District (B) Area (Ha)7663.87761 the site lies within this Greenbelt.

None of the above sites will be affected detrimentally by the proposed development.

The site lies also within a Network Enhancement Zone 1 (National Habitat Network All Habitats Combined (England))

5.5 Protected Species Records and Protected Species Scoping Survey

All biological records have been analysed in terms of their relevance to the site area and any possible impact the proposed development may have upon the species. Records are only a small indicator of what may or may not be present within an area depending on the knowledge of the recorder and the amount of survey effort undertaken. A species may be present on the site or within a 2km radius even though there are no records.

The site habitats and those with ecological continuity to it were evaluated for the potential or actual presence of or signs of protected species. All existing protected species data for within a 2km radius was used to make an evaluation as to the likely constraints to development and to inform any requirement for further survey, mitigation, compensation, or enhancement.

Where there is negligible likelihood of a protected species being present, such as in the case of marine or freshwater species on a site with no aquatic habitats, then these species have been omitted from consideration. In each case the designation for each species is given in an abbreviated form in brackets after the name. A key to these designation abbreviations is given in the appendix.

On this site, the species listed below were searched for and/ or present within the recorded data for a 2km radius. Via Forestry England, SBIS returned 230 records of protected species, those for common frog and smooth newt were recorded within 100m grid square accuracy of the site, and of a point 20m from the north compound boundary. No records pertain directly to the site area.

There are three equidistant records for different species all from 150m away: Grass snake *(Natrix helvetica),* dated 2020, to the northeast, common frog *(Rana temporaria),* dated 2012 to the northeast, and common pipistrelle *(Pipistrellus pipistrellus)* to the south, dated 2007.

Special note

'Absence of evidence is not evidence of absence' a field survey is only a reflection of a short visit and data records are not comprehensive.

5.5.1 Bats

There are 14 records for bats within the 2km search radius covering at least six species. No bats were observed on site during the field survey. The nearest record for bat species is for common pipistrelle (Bern2, Bern3, CMS_A2, CMS_EUROBATS-A1, HabRegs2, HSD4, ScotBL, WCA5/9.4b, WCA5/9.4c, WCA5/9.5a), dated 2007, from 150m to the south.

There are multiple potential roost sites for bats within the mature and semi mature trees to the site boundaries and also potentially within the agricultural buildings within the site area. A brief inspection of the modern barn buildings abutting the site area was undertaken in case of any possibility of disturbance during works, but no evidence of bat presence was found. These barns are of metal construction and showed no potential opportunities for bat roosting. Bats will be likely to use the site margins and possibly sheltered courtyard area between buildings for commuting and foraging.

Other species recorded within 2km are: Leiser's bat *(Nyctalus leisleri)* (Bern2, CMS_A2, CMS_EUROBATS-A1, HSD4), Soprano pipistrelle *(Pipistrellus pygmaeus)* (Bern2, CMS_A2, CMS_EUROBATS-A1, HSD4), brown log-eared bat *(Plecotus auritus)* (Bern2, CMS_A2, CMS_EUROBATS-A1, HSD4), noctule *(Nyctalus noctula)* (Bern2, CMS_A2, CMS_EUROBATS-A1, HSD4), and whiskered bat *(Myotis mystacinus)* (Bern2, CMS_A2, CMS_EUROBATS-A1, HSD4).

There is excellent habitat for bats to the sites margins Any tree pruning or removal should always be preceded by an inspection for potential bat roosts. This site, which is currently dark at night, should remain so.

5. 5.2 Invertebrates

There are 69 records for moths covering 24 species. The nearest records are 430m to the northeast, for oak hook-tip *(Watsonalla binaria)* and ghost moth *(Hepialus humuli humuli),* both dated 2011. There are also two records for butterfly small heath *(Coenonympha pamphilus),* the nearest being 760m to the southeast dated 2013. There is habitat for invertebrates within the grassy and wooded areas of the site. The area of proposed works contains minimal invertebrate habitat it being largely composed of hardstanding and close mown grass. Some narrow marginal invertebrate habitats can be found to the margins east, west and south, this should be retained wherever possible.

5.5.3. Reptiles

There are three records for reptiles: one for grass snake, (Bern3, Sect.41, UKBAP, WCA5/9.1k/I, WCA5/9.5a), two for adder, (Bern3, ScotBL, Sect.41, UKBAP, WCA5/9.1k/I, WCA5/9.5a). The nearest is for grass snake, 115m to the northeast dated 2020. There is limited reptile habitat on site – mainly to the grassy margins and wooded area to the south- the area of works contains limited fringe habitat which should be retained. The EcoW must check all areas prior to any clearance works. Once clearance has been completed, contractors must follow the RAMs throughout the works period.

5.5.4 Birds

There are 1327 records for birds covering 48 species, seven of which are Schedule 1[10]. The nearest records are 540m to the northeast for the following species (in each case the most recent record date is given): skylark *(Alauda arvensis),* (BAP; Berne: A3; BoCC4:Red; BirdsDir:A2.2; KRDB2; S41), 2019, whinchat *(Saxicola rubetra),* (Berne:A2; BoCC4:Red; Bonn:A2), 2018, stonechat *(Saxicola torquate)* (Berne:A2; Bonn:A2; KRDB1), 2019, starling *(Sturnus vulgaris),* (BAP; BoCC4:Red; BirdsDir:A2.2; S41; KRDB2), yellowhammer *(Emberiza citronella)* (BAP; Berne:A2; BoCC4:Red; KRDB2; S4), corn bunting *(Miliaria calandra),* (BAP; Berne:A3; BoCC4:Red; KRDB2; S41), 2017, fieldfare *(Turdus pilaris)* (Berne:A3; BoCC4:Red; BirdsDir:A2.2; WCA1), 2019, redwing *(Turdus iliacus),* (Berne:A3; BoCC4:Red; BirdsDir:A2.2; WCA1), 2019, greenfinch *(Carduelis chloris)* (Berne:A2; BoCC4:Green (subsp. Red), bullfinch *(Pyrrhula pyrrhula)* (BAP; Berne:A3; BoCC4:Amber; S41), 2019.

No Schedule 1 were observed on site.

The following assemblage of arable farmland and grassland bird species has been recorded within a 2km MAGIC map search, from 2005-2009 (plus any 2010 data available): Lapwing *(Vanellus vanellus*), (BD2.2, BRed, CMS_A2, CMS_AEWA-A2, ScotBL, Sect.41, UKBAP) and corn bunting.

All breeding birds are protected under the Wildlife and Countryside Act 1981 (as amended) with Schedule 1 birds receiving special year-round protection. The wider site area has habitat for breeding birds, none of which will be disturbed. There is a remote possibility that ground nesting birds may be present on site, but they are unlikely to be present in the areas of works. As a precaution the EcoW should check the areas of works before the start.

Several breeding birds and birds' nests were observed on site including blackbird *(Turdus merula),* wren *(Troglodytes troglodytes),* and chaffinch *(Fringilla coelebs).*

[10] Schedule 1 birds are birds receiving the highest level of protection all year round.

5.5.5 Hedgehog

There are four records for hedgehog (Bern3, RLGB.VU, ScotBL, Sect.41, UKBAP) within the 2km search radius, the nearest being 1 km to the west dated 1980, with more recent records further afield from 2000. There are almost certainly hedgehogs close to or within the survey boundary as grassy areas, tall ruderals, and woodland provide habitat for this species. Hedgehogs are protected under Schedule 6 of the Wildlife and Countryside act (as amended) and is listed as a Priority Species under the UK Biodiversity Action Plan.

No hedgehogs were observed during the site survey. It is possible that hedgehogs are present on site at times and could therefore be encountered during the development. The ECoW should mention the possible presence of this species during the Toolbox Talk and explain best working practice prior to works. RAMS methodology must be followed.

5.5.6 Brown hare

There is one very old record for brown hare (Lepus europaeus) (ScotBL, Sect.41, UKBAP), within the search radius, the nearest being 820m to the southeast dated 1962. There is very little suitable habitat for this species on site. It is possible that hares are at times and could therefore be encountered during the development, although no hares were observed during the survey. The ECoW should mention the possible presence of this species during the Toolbox Talk and explain best working practice prior to works. RAMS methodology must be followed.

5.5.7 Amphibians

There are 25 records for amphibians within the search radius: 20 for common frog, (Bern3, HSD5, WCA5/9.5a), the nearest being within 150m to the northeast dated 2012, four records for common toad Bern3, ScotBL, Sect.41, UKBAP, WCA5/9.5a, the nearest being 160m to the north 2015, and one record for great crested newt (Bern2, HabRegs2, HSD2p, HSD4, ScotBL, Sect.41, Sect.42, UKBAP, WCA5/9.4b, WCA5/9.4c, WCA5/9.5a, WCA5/9.5b), from 900m to the east, dated 1981-1990.

The site has ecological continuity with a pond 80m to the west of the proposed site area, located in woodland beyond the west site boundary, and approximately 90m to the north of the site lies Henhurst Lake and a further lake, to the northeast. The site has ecological continuity with Jeskyns Community Woodland area. There is also a small spring located which rises in the woodland belt which borders the surveyed area to the south, approximately 35m to the southwest of the proposed site area. There is habitat for frogs, newts, and toads among these areas and amongst the long vegetation and woodland areas, but minimal habitat within the location of the proposed new office building or on the plant access roads and hardstanding. The ECoW should mention the possible presence of these species during the Toolbox Talk and all contractors must follow the RAMs document.

5.5.8 Badger

There are six records of badger (Bern3, PBA), within the search radius, the nearest being 900m to the east dated 2017. There are no suitable habitats for badger within the proposed site, and very limited habitat within the surveyed area, there was no evidence of badger within the narrow woodland belt to the surveyed areas' south boundary. Badgers may well be present within close proximity – in the larger woodland areas and fields beyond the site boundaries. The ECoW should mention the possible presence of these species during the Toolbox Talk and all contractors must follow the RAMs document.

5.5.9 Hazel dormouse

There are 46 records of hazel dormouse (Bern3, HSD4), the nearest being 630m to the north, 45 records dated between 2018 -2020. There is habitat for this species top the margins of the surveyed area, but no hedgerow or woodland is scheduled for removal or works. The site area does not contain suitable habitat for this species; however, its presence locally is important to be aware of incase of the low possibility it may be encountered during works. . The ECoW should mention the possible presence of these species during the Toolbox Talk and all contractors must follow the RAMs document.

5.5.10 flowering plants

There are nine records for flowering plants within the search radius, the nearest being for knot grass *(Acronicta rumicis),* 420m to the northeast in Jeskyns Community Woodland, dated 2011. No plant species of note were observed within the proposed site area. Enhancement measure should seek to improve the floristic diversity of the margins.

6 Field Survey

6.1 Timing and Weather

The site was surveyed on Friday 17th September 2021 during daylight hours.

6.2 Survey Conditions

Temp / and Relative Humidity (average)	Wind direction	Wind speed	Cloud cover	Visibility
20° C / 80%	SW	6mph gusts	80%	good

6.3 Site description

Unless specifically sated otherwise all measurements are approximate.

The demarcated survey area is a relatively small (3574m²) and consists largely of a central hardstanding yard, with modern metal barns to the east, all of which are to remain unaffected by the proposals, and two disused arrays of former grain silos to the east and south, some of which may be removed.

There is a site office portacabin, and small areas of predominantly improved long grass together with a narrow band of woodland to the south, with tall ruderals to the boundaries. Immediately beyond the west boundary is a line of open fronted concrete and brick barns under corrugated roofing with enclosed well-sealed brick store to the southern end. These former barns are now used for storage and are outside the surveyed area as they will not be affected by works. The actual site of the new office building is a small (195m²) rectangle of hardstanding land to the northwest of the survey area, please see photographs below.

Figure 1 Looking west over the proposed site of the new office (left) looking south over the same site (right).





The surveyed area is accessed via either of two tarmac drives leading north directly off Jeskyns Road, one which leads straight into the hardstanding yard from the south and one which curves around the boundary to enter the same yard from the east. Immediately bordering the central hardstanding yard is an area of young woodland, species include hazel, tree of heaven *(Ailanthus altissima), Malus sp*, and dogwood *(Cornus sanguinea),*with an understorey of common *nettle (Urtica dioica)* snowberry *(Symphoricarpos albus laevigatus),* bramble *(Rubus fruticosus agg)* field rose *(Rosa arvensis)* and comfrey *(Symphytum officinale).* All this wooded area will remain unaffected by the proposals.

The barns arranged along the west boundary of the surveyed area contain straw and stored items. The enclosed brisk store to the southern end has outside lighting and a large bug hotel on its south elevation and there is a bird box on the north barn post. To the south of the barns is a post and rail fence line with a 2m close mown grass verge bordering the access track. Beyond this fenceline boundary to the west is a scrub woodland with dominant species of rose, dogwood, bramble, hawthorn *(Cratageous monogyna)*, and cherry *(Prunus avium).*

To the east of the south entrance track is an area of improved high grass species with stored logs, and patches of tall ruderals and scrub. Beyond this eastward is a narrow band of woodland bordering the disused silo area. This woodland is dominated by mature field maple, with a common nettle dominant verge. This narrow band of woodland occupies a space running east/west between the grain silos to the south of the site and a line of cottages extending north in a narrow band and bordering the area of proposed works. The woodland although dominated by field maple also contains beech and some very mature yew. It has a close mown grass verge of improved grassland to the south and a pathway along the edge of the fenced silo area to the north. There is a small spring to the western end which crossed the pathway and trickles across into the silo area creating a wet habitat.

Figure 2 Top: The barns along the west boundary of the surveyed site with concrete yard to the fore (left), and the area of young woodland to the north of the site (right) Below: Looking east across the improved grass area(left) and along the walkway to the north of the band of woodland south of the grain silos with a small spring to the eastern end (left).









To the east boundary of the central hardstanding yard are an array of modern metal barns, all of which are to remain unaffected by the proposals. The barn to the south is approximately 5m x 8m x 5.5m to the apex and is attached to the timber fencing of the silo area at its southeast corner. It has corrugated roller shutters to the west elevation and a timber door to the northern end. It was briefly inspected inside for any evidence of bat species but showed no likelihood of providing a suitable habitat. There are large gaps to the corrugation to the north and south and it is used to store equipment and houses electric circuit boards. It is to remain unaffected by the proposed works. There was no evidence of barn owl *(Tyto alba)*.

To the north is a large (26m x 26m x 6m) double apex barn with corrugated roof. It has guttering to the north with a downpipe to the northeast. These barns contain tractors, trucks, and a large amount of hay bales. They have concrete flooring and internal fluorescent lights and are in constant use. They were briefly inspected for signs of protected species, but no evidence was found. These buildings will not be affected by works. All barns have spotlights to the west elevation. There is a small area (2.5m x 5m) between the barns used to store pallets and plastic tree guards which will also not be affected by works.

Figure 3 Barns to the east of the central hardstanding yard (left) and interior (right).





There is an office portacabin (12m x 5m) located to the southeast of the central hardstanding yard and east of this is the silo array. The silo array is surrounded by a high timber fence (broken in places), with a gate to the southwest. The silo area is a reverse 'L' shape with four silos bordering the proposed area of works and the remainder running east west along the south of the site.

Internally between the silos it is colonised by common nettle, bramble, and elder scrub, with some holly *(Ilex aquifolium),* silver birch, and mature elders. There is an area of wet vegetation to the southeast corner where the spring expires. The interior of the silo area was thoroughly searched for any sign of protected species, but no evidence was found. Several of the mature elders have high bat roosting potential and should not be removed without bat surveys being undertaken, however the proposals will not affect these trees. There are two small (2.5m x 2m x2m) breeze-block storage buildings with corrugated roofs within the silo area. Neither of these buildings will be affected by works.

The proposals may require the removal (by dismantling) of the four silos to the immediate west of the site area. There was no evidence of protected species use of these silos or the areas immediately around them. No trees should be removed without further surveys for bats. Please see photographs of the silo area below.

Figure 4 Top: Between silos to the south looking west (left) the wet ivy covered area to the southeast (right) Below: The area between the back of the modern barns and the silos (left) and looking southwest over the proposed site area to the four silos which may need to be dismantled (right).









To the northwest of the silo area and south of the east access drive is a small (4m x 4m) timber fenced area with a hardstanding base and gate to the north housing two Portaloos and a storage shed (1.5m x 1m0 with a flat felt roof. This area was searched for any signs of protected species or habitat, and none was found. It is to be unaffected by works.

To the north boundary of the silo area and the modern barns within the hardstanding area is the eastern access road bordered to the south by a small grass verge of improved grassland with a 17m long run of hedging inside a post and rail fence. Species include holly, rose, hazel, elder, dogwood, with old man's beard *(Clematis vitalba),* and hedge bindweed *(Calystegia sepium).* This hedgerow is to remain undisturbed. To the north of this eastern access road is a line of dogwood hedgerow which is also to remain unaffected by works.

Figure 5 Looking along the eastern access road with the dogwood hedging (left) and the species-rich hedging and modern barn (right), small, fenced area (below).







The hardstanding area of proposed works measures approximately 17m x 28m with a slight uphill rise to the south on the fringe of the wooded area. The new building will be situated on a north/south axis, and only occupy approximately 195m² centrally of this area which is currently used for parking. There are areas of close- mown improved grassland to the east and west margins.

There is a line of tall ruderals abutting the post and rail fencing of the adjoining tree nursery area to the east. On the grassy area to the west are piles of shale and shingle and stored timber, with one monolith, together with offcuts, a metal skip, and agricultural machinery. To the southeast corner is a gate into the tree nursery area and stacked stone flags, and to the central south is a mature hornbeam *(Carpinus betula)* and a mature silver birch at either side of the grassy rise into the wooded area. To the north is the tarmacked east access road.

Figure 6 Top: Looking south along the east boundary of the proposed site area (left) and looking south along the west boundary (right).Bottom: Proposed site area looking south (left) and entrance to wooded area on a rise at the south boundary (right).









6.4 Phase 1 Scoping Survey

The site was examined for any signs of a protected species or their potential habitat. The habitats have been classified using the JNCC Phase I system with appropriate coding in brackets. Please see the Appendix for Phase I Habitat Map and Target Notes for further details. The habitats consist of the following:

1.Improved grassland

This habitat is present to the margins of the site area in small pockets, and along the borders of access trackways, with dominant species: annual meadow grass *(Poa annua)*, rough stalked meadow-grass *(Poa trivialis)*, and perennial rye grass *(Loliulm perenne).*

2. Scrub (A2)

There are areas of bramble and elder scrub within the silo array and to the wooded area.

3. Tall ruderals (C3.1)

This habitat is scattered across the surveyed area, to the boundaries and the wooded areas, and amongst the grass area to the south (west of the entrance track). Dominant species include common nettle, comfrey, broad-leaved dock *(Rumex obtusifolius)*

4. Semi-natural woodland (broadleaved) (A1.1.1)

This habitat is found to the south and east of the surveyed area, field maple dominant, with silver birch, hawthorn, hazel, elder, yew, cherry, hawthorn and beech.

5. Hedgerow species -poor (J2.1. 2)

This takes the form of a run of dogwood hedgerow to the north boundary of the eastern access track.

6. Hedgerow species -rich (J2. 1.1)

This habitat isa an approximately 17m run of hedging to the south of the eastern access track, species include dogwood, rose, holly, hazel, and elder.

7. Scattered trees ((A.3.1)

These are predominantly elder and found within the silo array.

8.Buildings (J6)

These consist of metal and concrete modern barns, storage sheds, and the current portacabin office none of which will be affected by the proposals.

9. Areas of bare ground and hardstanding (J4, J5)

This is found covering the proposed site area, the central hardstanding yard, access roads, and to the small storage compound to the north of the silo array. Only the area of the site will be affected.

10. Fence (J.2.4)

This is found to the east of the south access track, around the silo array compound, and to the south of the east access track. to all boundaries of the compound. It consists of either post and rail or panel fencing.

10. Running water (G2)

This is a small spring located to the southwest wooded area which crosses a footpath and collects in the southwest corner of the silo compound.

12. Silo array

This array borders the proposed area to the east and continues south. It is comprises of large metal former grain silos in a timber fenced compound. Inside the compound there is a wet area to the southwest, and several mature elder trees. There are also areas of tall ruderals and ivy between the silos. Four silos bordering the proposed site area to the east may need to be dismantled and removed.

Please see Phase I Map in appendix for layout.

8 Evaluation

An evaluation of the site's ecological features regarding species and habitats following the Guidelines for Ecological Impact Assessment (CIEEM 2006) and using the recommended geographic frame of reference is presented in Table 2 below.

8.1 Evaluation of Ecological Value of the site

Level of Ecological Value of habitats on site or within a 2km radius	Description and discussion	Level of impact
International **Features of international value are sites with international protection or designations, e.g. sites designated under the 2010 Habitats Directive, these include Ramsars, Special Protection Areas and Special Areas of Conservation**	The site does not lay within or close to any sites of international importance, nor were there any signs of species or habitats of international importance within or close to the site area.	None
National **Features of national value are sites with statutory protection e.g. Sites of Special Scientific Interest, or sites designated as being of national importance for nature conservation either for their habitat or the species assemblage present, or possibly present, such as National Nature Reserves.**	There is one site of National Importance within the 2km search radius. 1 Shorne and Ashenbank Woods SSSI 800m to the east Reference:1000322, Hectares:197.44, Citation: 1001250 The site lies within the SSSI Impact Risk Zones of the above woodland, and the Impact Zones of Cobham woods SSSI 2.1km to the east, Great Crabbles Wood SSSI 3.9km to the northeast. A National Areas of Outstanding Natural Beauty (England) lies 400m to the east Reference: 18, Name: Kent Downs, Statutory Area in Sq.km; 879 There will be no measurable impact on any of the sites.	None None None

County/District **Local authorities and The Wildlife Trusts have designated sites that are recognised as of importance at regional/county, district/borough levels. A variety of names are used to identify these sites, e.g. County Wildlife Sites, Local Nature Reserves, Roadside Nature Reserves, Local Sites**	The following areas of Priority Habitat have been identified within the 2km search radius; in each case the nearest incidence is given: 1. Ancient Semi-Natural Woodland 1.1 Shorne and Ashenbank Woods 800m to the east 1.2 Claylane Wood 1.1km to the north. 1.3 Cobhambury Wood 1.9km to the southeast 1.4 Cozenden Wood 1.3km to the west 2. Deciduous woodland, Twenty Acre Wood 900m to the northeast 3. National Forest Inventory, Category: Woodland, Interpreted Forest Type: Broadleaved, 65m to the south 4. Traditional Orchards 65m to the south. 5. No main habitat but additional habitat exists (FEP features: G04: Lowland calcareous grassland)1.6km to the west The proposals will not affect any of these Priority Habitats	None
	There are two County wildlife Sites within the 2km search radius: 1. CWS Number: Suffolk Coastal 202, Site Name: OAK WOOD, as above, 1.4km to the northeast 2. CWS Number: Suffolk Coastal 37, Site Name: WATER WOOD 1.6km to the northeast There will be no impact on these sites from the proposals.	None
	Green Belt The site lies within the London Area Greenbelt, Local Authority: Gravesham District (B) Area (Ha)7663.87761 This will not be affected detrimentally by the proposed development.	None

Local/Parish Impacts within the immediate local area and surroundings, such as village greens, parks, small wildlife areas, spinneys, verges, local habitat connectivity including steams, brooks, and ditches, as well as local or potential species assemblages or habitats e.g. bat roosts, great crested newt or water vole presence.	On site the areas of improved grassland and gravel within the proposed location of the new office building are of low value. Small amounts of tall ruderals/scrub around the margins of the new proposed site may be lost and these should be compensated for by re-seeding of the site boundaries with native wildflowers suitable for the soil type once works have been completed.	Low – this habitat must be retained where possible and when likely to be lost must be compensated for by ground preparation and re-seeding.
	The trees on site will provide roosting habitat for bat species and nesting and foraging habitat for birds, as well as habitat for invertebrates. Presently there are no plans to remove or prune any trees, should this situation change, then bat and bird scoping surveys must be undertaken prior to any works.	Potentially high No trees should be removed without a check for the presence of breeding birds or a Potential Bat Roost Assessment (PBRA) for bat species.
	There are records of bat and bird species within the immediate area. The adjoining wooded areas to the east, north and south provide excellent habitat. No new lighting should impact on these areas. The proposals will be extremely unlikely to have an impact on these species.	Low – no impact likely.
	There are records of reptiles within a 2km radius and the site provides excellent habitats for most of these species, however the area of works is considered unlikely to contain reptiles and no further surveys are required if the ECoW searches the site before works commence and then subsequently the RAMs Methodology is adhered to.	**Low – RAMs Method Statement must be adhered to during works.** .
	There are records of dormouse within the search radius but no potential habitat for this species is to be affected by works.	Negligible
	There are records of invertebrates, frogs, toads, great crested newt, hedgehog, badger, and brown hare within the 2km search radius. An ECoW must be present on site to deliver a Toolbox Talk to all contractors prior to works beginning and should be present to supervise any scrub or tall ruderal clearance. RAMS must be adhered to.	**Low – RAMs Method Statement must be adhered to during works.**

9 Ecological Constraints and Recommendations

The Legislation referred to in this section is not fully comprehensive and does not take account of all possibilities of infringement or detail every possible application. It is the responsibility of the client to ensure that they are familiar with all relevant legislation prior to any works.

9.1 On-Site Habitats

9.1.1 Improved grassland

The narrow areas of improved grassland to the site area margins are of low ecological value and its loss would not be significant within the International, National, County, or local level. This habitat does not constitute a constraint to development of this site area.

9.1.2 Mature and semi-mature trees (special reference to breeding birds, bats)

This is an important habitat for breeding birds and potentially bat species which are known to be present locally.

This habitat does not constitute a constraint to development unless there are changes to the proposals as no trees are likely to be pruned or removed as part if the proposals. However, the client is reminded of the following:

- Breeding birds are using the trees on this site for nesting during the season.
- It is an offence to disturb/injure breeding birds and their nests during the breeding bird season which runs from March to September, some species of birds listed under Schedule 1 of the Wildlife and Countryside Act 1981 (as amended) are protected at all times, Schedule 1 birds have been recorded within 2km of this site.
- No trees or hedgerow should be removed until a breeding bird survey has been undertaken.
- The trees on site are likely to be used by bat species for roosting, foraging, and commuting.
- It is an offence to disturb/injure bats of all species at any time. Both bats and their roosting sites are fully protected at all times under UK and European legislation, roosting sites are protected *whether the bat is present or not.*
- No trees should be subject to ANY works before a Potential Bat Roost Assessment has been undertaken.
- No external lighting should be directed towards trees; lighting should be of a low lux level and directed away from any potential bat commuting habitat.
- **All mature trees within close proximity to the proposed development (in particular the hornbeam and silver birch to the immediate south of the [proposed site area) will require root protection in accordance with BS 5837:2012 Trees in relation to design, demolition, and construction which site contractors must follow.**

9.1.3 Tall ruderals

The proposed development may necessitate the removal of a small amount of tall ruderals. Tall ruderals provide important food for invertebrates, and potential refugia sites for reptiles, amphibians, and small mammals such as hedgehogs.

- Hedgehogs are known to be present within the local area. Grass snake, adder, hedgehog, and brown hare have also been recorded within a 2km.
- Any removal of this habitat should be preceded by a hand-search either by or in the presence of an ECoW. This loss should be compensated for within the landscape design.

9.1.4 Areas of hardstanding and buildings

These do not constitute a constraint to development.

9.2 Species

9.2.1.1 Bats

Bats will be utilising the site at times and there are records of bats within the 2km search radius. No potential bat habitat is likely to be impacted on by the current proposals. This species does not constitute a constraint to development.

NB. Light levels must not be significantly increased on the site or the wider site area before, during, or after works.

9.2.1.2 Birds

Breeding birds will be utilising the site area and there are records of birds (including ground nesting birds) within the 2km search radius. There was no evidence of breeding birds from the inspection of the existing office building ad no trees or hedgerows are scheduled for removal to facilitate works. It is considered unlikely that any bird species will be impacted upon, and this does not constitute a constraint to development providing the RAMS Methodology is adhered to. The ECoW must check the areas of proposed works for ground nesting birds immediately prior to works.

9.2.1.3 Reptiles/amphibians

There are records of reptiles and amphibians within a 2km radius. However the area of works is small, and the hardstanding area is unlikely to contain reptiles or amphibians. It is considered unlikely that any reptile and amphibian species will be impacted upon, and this does not constitute a constraint to development providing the RAMS Methodology is adhered to. The EcoW must check the areas of proposed works for reptiles immediately prior to works.

9.2.1.4 Small mammals (dormouse) and badgers

There are records of hedgehog, dormouse, badger, and brown hare within 2km of the site. The site area does not contain suitable habitat for these species, save for very narrow patches of tall ruderals to the margins. However, an ECoW must hand search any areas of vegetation in which these species could be present before it is removed by mechanical means and before any heavy plant crosses it. It is considered unlikely that any species will be impacted upon, and their potential presence within the immediate vicinity does not constitute a constraint to development providing the RAMS Methodology is adhered to. The EcoW must check the areas of proposed works for small mammals immediately prior to works.

10 Ecological Clerk of Works and RAMS Method Statement

- Due to the presence of valuable habitat adjoining the site to the northeast and west, and the wooded area with a small spring to the south, there is a small but potential risk of presence of protected species on this site. A Reasonable Avoidance Measures (RAM's) Method Statement should be produced by a suitably qualified ecologist for this site.

- This RAMS Method Statement must outline in detail the avoidance measures that will be implemented on this site in all areas throughout the duration of works in order to ensure that all possible precautions are undertaken to avoid any potential harm or disturbance to wildlife or their habitats.

- An ECoW must be appointed to deliver a Toolbox Talk to all contractors immediately before works commence. The ECoW must outline the following requirements:

- Direct mortality to many species during the construction phase can be avoided through implementation of RAMS best practice, details of which should be followed by all site personnel.

- Scrub should be hand searched prior to mechanical vegetation removal and cutting operations as they may potentially support reptiles and hedgehogs.

- Care should also be taken to ensure that no trenches or ground excavations are left open without a means of small mammals, and reptiles being able to find their way out. Any dug pits or unfilled foundation work should either be covered or have mammal ramps positioned in them to allow any trapped animals to escape.

- All piles of spoil, timber, or rubble should be kept clear of the ground, by removal either to a skip, or by being elevated, to ensure that potential refugia sites are not inadvertently created.

- There should be no lighting of bonfires. Any brash and log piles on site should be searched by hand before removal/skipping and if hedgehogs or other small mammals are discovered that they should be translocated to a suitable location.

- All chemicals and plant machinery should be stored in allocated areas away from trees and possible wildlife corridors and kept to designated hardstanding areas.

The presence of the ECoW is required on site during vegetation removal and during any excavation works.

11 Summary of Further Actions/Survey Requirements

Habitat/Species	Action	Enhancement Opportunity
All	Appointment of Ecological Clerk of Works for this site prior to development start. The EcoW will provide a Reasonable Avoidance Method Statement (RAMS) which will detail best practice working methodology and reasonable avoidance measures to be in place on site throughout the duration of works. The EcoW will also be responsible for agreeing exclusion zones, supervising vegetation removal, and delivering Toolbox Talks to contractors, as well as ensuring any mitigation/ compensation and enhancement measures are fulfilled.	**There are opportunities for site enhancement of both the wider site, and the proposed new office area which are species specific. Please see below, and the relevant section of the report for further details.**
Bats	The site boundaries are eminently suitable for bat species, as are the agricultural buildings to the west boundary. No species specific surveys were carried out, but a brief inspection of the barns bordering the proposed site area revealed no evidence of bat presence. The site should remain a dark site at night both before, during, and after works. It is understood that no trees will be removed to facilitate works, should this situation change, then any tree to be removed would require a Potential Bat Roost Assessment.	**The new building should have two bat boxes installed to the exterior, on aspects sheltered from strong winds and exposed to the sun for part of the day (usually south, south-east or south-west).**
Reptiles	The site contains some limited habitat for reptiles and grass snake has been recorded in the data search results. An EcoW presence is required to search any areas of low vegetation removal prior to works. **RAMS Methodology must be followed.**	**An enhancement for the site would be the creation of brash/log piles placed on grassland to the southeast of the existing portacabin. These can be created from arisings of scrub control. Piles should be placed in a sunny location and set within existing vegetation (for example, areas of long grass or long grass and scattered scrub), so that there is cover immediately surrounding, or adjacent to, the pile. Areas of this grassland could be mown, or small patches cleared to 'hot spots' (foci).**
Hedgehogs/ small mammals/frogs/toads	The EcoW should remain on site during works to any potentially wildlife-sensitive areas such as removal of tall ruderals. **RAMS Methodology must be followed.**	**Areas of long vegetation should be retained wherever possible. Two hedgehog boxes should be provided to the woodland (south) boundary of the proposed office area, away from car parking.**
Birds	There are records of ground nesting birds within the search radius, but these are unlikely to be present within the search radius. If works are scheduled between March – September, then the EcoW should undertake a check of the site area to ensure no ground nesting birds are present. These species, together with others may well be present on site and no tree removal must take	**At least four bird boxes should be installed on site, two to be available for use by song thrush (*Turdus philomenus)* one for house sparrow *(Passer domesticus)* (both UK BAP/ Priority Species), and a fourth for swift *(Apus apus).* These should be located within the site area. These could be affixed to existing buildings or the new office building.**
Invertebrates	There are records of invertebrates within the search radius, within the search radius. A very minimal amount of invertebrate habitat will be lost as a result of these proposals. The appointed ECoW should ensure contractors are aware of disturbance to potential invertebrate habitat particularly among the small amount of tall ruderal areas which may be impacted upon. **RAMS Methodology must be followed.**	**The creation of a second ' bug hotel' on site (there exists one to the barn wall located on the west boundary) would be an enhancement for invertebrates amidst the predominately hardstanding areas of the site.**
Area of improved grass and tall ruderals, small areas of scrub.	Removal of any tall ruderals and longer grass clearance should be supervised by the ECoW immediately before works commence to avoid the potential for harm/disturbance to small mammals such as hedgehog, as above. **RAMS Methodology must be followed.**	**There will be minimal loss of this habitat.** **An enhancement for the site would be the seeding of native pollen-rich plants to the site area margins, this would benefit both invertebrates and therefore bat species.**
Trees	Any trees close to the areas of works will need root protection in accordance with BS5837:2012 Trees in relation to design, demolition, and construction which site contractors must follow. Any removal or pruning of trees will require further survey, as above.	

12 Enhancement/Opportunities

1. At least four bird boxes should be installed on site, two to be available for use by song thrush, one for house sparrow, and a fourth for swift. These should be located within the site area. These could be affixed to existing buildings or the new office building.

2.Two bat boxes should be incorporated into the new proposals, these should be suitable for use by the bat species recorded within a 2km radius, i.e. *Pipistrellus sp* and brown long-eared bat.

3. An ecological enhancement for the site would be the creation of a second 'bug hotel' as there are several areas of stored timber on site this would be an easy enhancement to create.

4. The boundaries of the new office area should be seeded with appropriate wildflowers for the benefit of invertebrates and bat species.

5. The creation of brash/log piles placed on grassland to the southeast of the existing portacabin would also be an enhancement for the surveyed area. These can be created from arisings of scrub control. Piles should be placed in a sunny location and set within existing vegetation (for example, areas of long grass or long grass and scattered scrub), so that there is cover immediately surrounding, or adjacent to, the pile. Areas of this grassland could be mown, or small patches cleared to 'hot spots' (foci).

Please see below for a list of other useful links to facilitate the above:

1. Invertebrate friendly native plants http://www.essexbiodiversity.org.uk/app/webroot/files/ibd/creation.pdf

2. Bat boxes http://www.bats.org.uk/pages/bat_boxes.html

3. Bird boxes https://www.birdfood.co.uk/about-our-nest-boxes

13 References

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14 Appendices

Regarding this site and the species likely to be present within it or within habitats linked to it, the following legislation and planning policies may apply. Below represents a summary only, it is the client's responsibility to ensure they are aware of the details of legislation and planning policy regarding this site.

14.1 Legislation and Planning Policy

14.1.1 Legislation

The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019

Coming into force in accordance with regulation 1 The Secretary of State for the Environment, Food and Rural Affairs and Welsh Ministers have made changes to parts of the 2017 Regulations so that they operate effectively.

Most of these changes involved transferring functions from the European Commission to the appropriate authorities in England and Wales. All other processes or terms in the 2017 Regulations remain unchanged and existing guidance is still relevant.

The Conservation of Habitats and Species Regulations 2017

The Conservation of Habitats and Species Regulations 2017 came into force on 30th November 2017.

The Regulations consolidate and update the Conservation of Habitats and Species Regulations 2010, which have been updated a total of 10 times since they were last consolidated in 2010. As such, the new set of Regulations seeks to improve clarity and accessibility to the legislation.

On this site, this legislation may be particularly applicable for bat and bird species.

The Regulations make it an offence (subject to exceptions) to deliberately capture, kill, disturb, or trade in the animals listed in Schedule 2, or pick, collect, cut, uproot, destroy, or trade in the plants listed in Schedule 4. However, these actions can be made lawful through the granting of licenses by the appropriate authorities.

Licenses may be granted for several purposes (such as science and education, conservation, preserving public health and safety), but only after the appropriate authority is satisfied that there are no satisfactory alternatives and that such actions will have no detrimental effect on wild population of the species concerned.

It is a criminal offence, liable to prosecution, which could result in imprisonment or fine, if these regulations are contravened without one of the detailed defences outlined within the regulations.

With reference to this survey: It is an offence for anyone intentionally to kill, injure or handle a bat, to possess a bat (whether live or dead), disturb a roosting bat, or sell or offer a bat for sale without a licence. It is also an offence to damage, destroy or obstruct access to any place used by bats for shelter, whether they are present or not.

Please refer to the actual legislation for the precise wording, which can be found at:

http://www.legislation.gov.uk/uksi/2010/490/pdfs/uksi_20100490_en.pdf

Natural England SNCO full guidelines can be found at:

https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals

The Wildlife and Countryside Act 1981 (as amended)

The Wildlife and Countryside Act protects wild birds, from being killed, injured or captured, and in addition, their nests and eggs are protected from being damaged, destroyed, or taken. Certain reptiles and amphibians also receive protection under this act.

Some breeding birds, (such as some of those recorded within the 2-km search radius for the site), receive additional protection through being listed on Schedule 1 of the Act, which also makes it an offence to intentionally or recklessly disturb this species whilst it is nest-building, is at or near a nest with eggs or young, or to disturb dependent young.

The Natural Environment and Rural Communities Act (2006)

Part III, (40): Duty to conserve biodiversity.

Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.

Conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat. Section 41 of The NERC Act lists all species which list of habitats and species that are of principal importance for the conservation of biodiversity in England. The list covers 56 habitats and 943 species and is based on the UK Biodiversity Action Plan (BAP) List of Priority Species and Habitats Action Plans (HAPs).

In addition to the above:

'The presence of a protected species is a material consideration when a planning authority is considering a development proposal (para 98, ODPM circular 06/2005). It is essential that the presence or otherwise of a protected species, and the extent that they may be affected by the proposed development is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision'. (para 99, ODPM[11] circular 06/2005).

Countryside and Rights of Way Act 2000

This act places a duty on Government Departments to have regard for the conservation of biodiversity and maintain lists of species and habitats for which conservation steps should be taken or promoted, in accordance with the Convention on Biological Diversity.
Schedule 9 of the Act amends SSSI provisions of the Wildlife and Countryside Act 1981, including provisions to change SSSIs and providing increased powers for their protection and management.
Schedule 12 of the Act amends the species provisions of the Wildlife and Countryside Act 1981, strengthening the legal protection for threatened species. The provisions make certain offences 'arrestable', create a new offence of reckless disturbance, confer greater powers to police and wildlife inspectors and enables heavier penalties on conviction of wildlife offences.

Wild Mammals (Protection) Act 1996

This Act makes it an offense for any person to mutilate, kick, beat, nail or otherwise impale, stab, burn, stone, crush, drown, drag or asphyxiate any wild mammal with intent to inflict unnecessary suffering.

[11] Office of the Deputy Prime Minister

14.1.2 Planning Policies

Much of the pressure on biodiversity is related to development and land use. Consequently, the planning and development process has a fundamental role to play in controlling and relieving this pressure. Failure to address biodiversity issues may cause a planning application to be refused.

This important role for the planning system has been recognised in legislation and the Government's planning guidance. The principle is continued through the draft Regional Planning Guidance for the East of England to 2021 (RPG14) and applied at local level through development plans for Norfolk i.e. the relevant policies in the Mid Suffolk District Plan).

Within the Local Government Act 2000 (Part 1, Section 2.1.c), local authorities are given powers to improve the environmental well-being of their area, of which biodiversity is a key element.

Restoration and enhancement may be necessary to rebuild what has been lost as well as maintain what we have at present. It is also important that monitoring post development is undertaken through the land-use planning system.

The loss of biodiversity and the subsequent negative environmental impact runs contrary to the aims and objectives of sustainable development. In principle, sustainable development should not lead to a 'net loss' in biodiversity or natural resources.

National Planning Policy Framework (NPPF) July 2021

National Planning Policy Framework was published on 20 July 2021, this sets out the government's planning policies for England and how these are expected to be applied. Chapter 2 'Achieving sustainable development', members of the United Nations – including the United Kingdom – have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise.

The National Planning Policy Framework must be considered in the preparation of local and neighbourhood plans and is a material consideration in planning decisions.

Planning policies and decisions must reflect and where appropriate promote relevant EU obligations and statutory requirements.

Policy Framework constitutes guidance for local planning authorities and decision-takers both in drawing up plans and as a material consideration in determining applications.

The NPPF covers a wide range of topics including housing, business, economic development, transport and the natural environment. The NPPF introduced the presumption in favour of sustainable development which means that development which is sustainable should be approved without delay. There are three pillars of sustainability (social, economic and environmental) and the Framework contains a number of sections which, taken as a whole, constitute the Government's view of what sustainable development means in practice

The Natural Choice- securing the value of nature, Natural Environment White Paper (Implementation Update Report October 2014).

In 2011 this White Paper set out how the value of nature could be mainstreamed across our society. It set out 92 specific commitments for action. commitment 90 promised to "develop a set of key indicators...to track progress on the ambitions of this White Paper". These are now in place and are entitled the England Natural Environment Indicators (ENEIs).

Of relevance to proposed development in communities are commitments 4-7' Local Nature Partnerships', Commitments 8-13 'Nature Improvement Areas', Commitment 14 'Protecting Natural Value Through the Planning System' Commitment 15 'Offsetting the Impact of Development on Biodiversity' Commitments 20-22 'Protecting and improving our woodland and forests' (Commitments and commitments 23-24 'Diverse and living landscapes'.

14.2 Phase 1 Survey Maps (JNCC &Satellite)

Jeskyns Farm, Jeskyns lane, Gravesend, Kent Survey date: 17/09/2021 NGR: Do not scale from this drawing, to be used in conjunction with architect's plans.





14. 3 Target Notes

TNI Areas of grass, stored timber, tall ruderals (and potentially small areas of scrub): These areas must be hand searched for the presence of reptiles, amphibians, or small mammals by the EcoW immediately prior to the commencement of works. The EcoW must remain on site for any excavations. The RAMs Methodology must be followed at all times





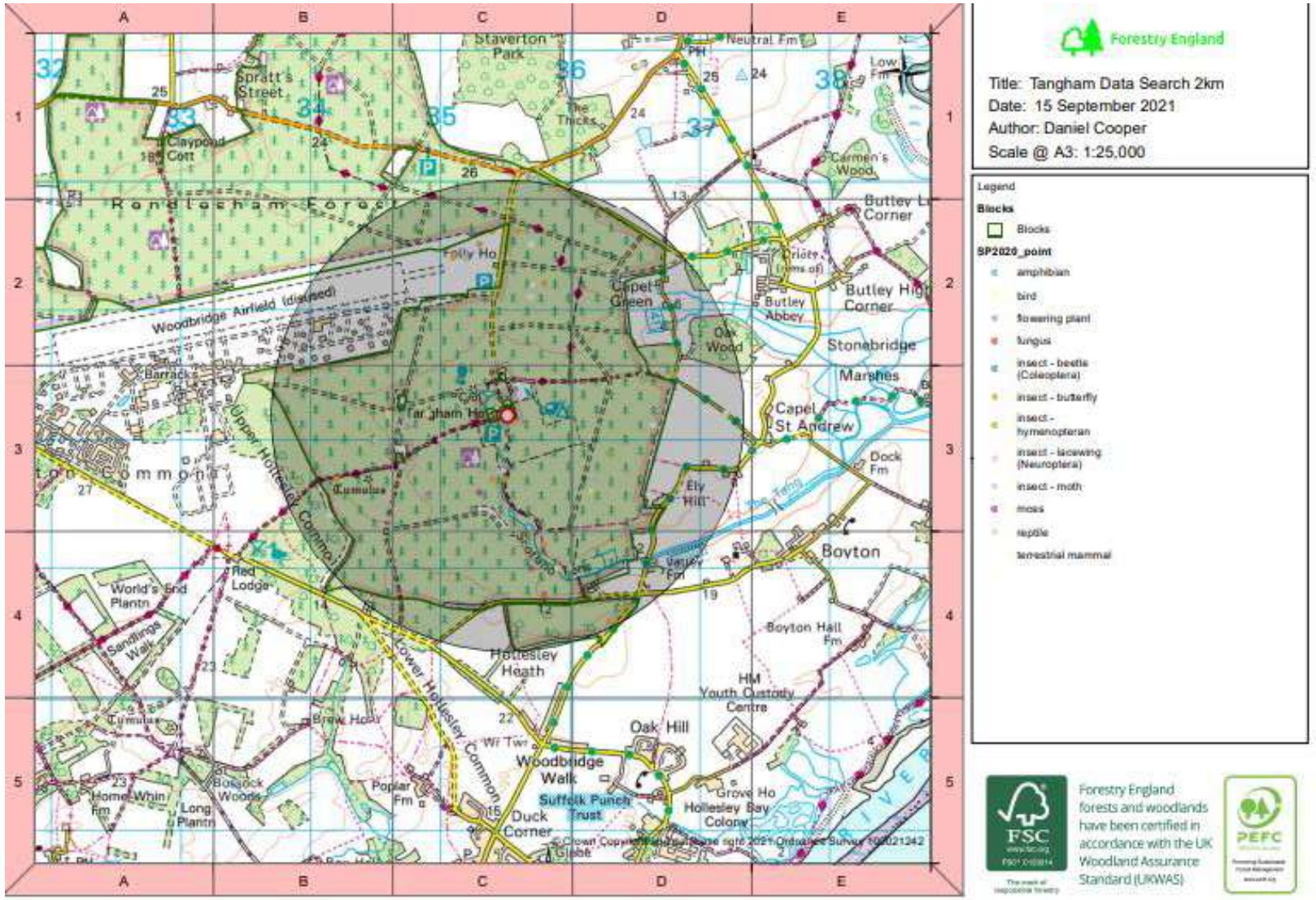
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TN2

Trees to the south boundary of the site - i.e. a mature silver birch (below) and a hornbeam, may need root protection during works.

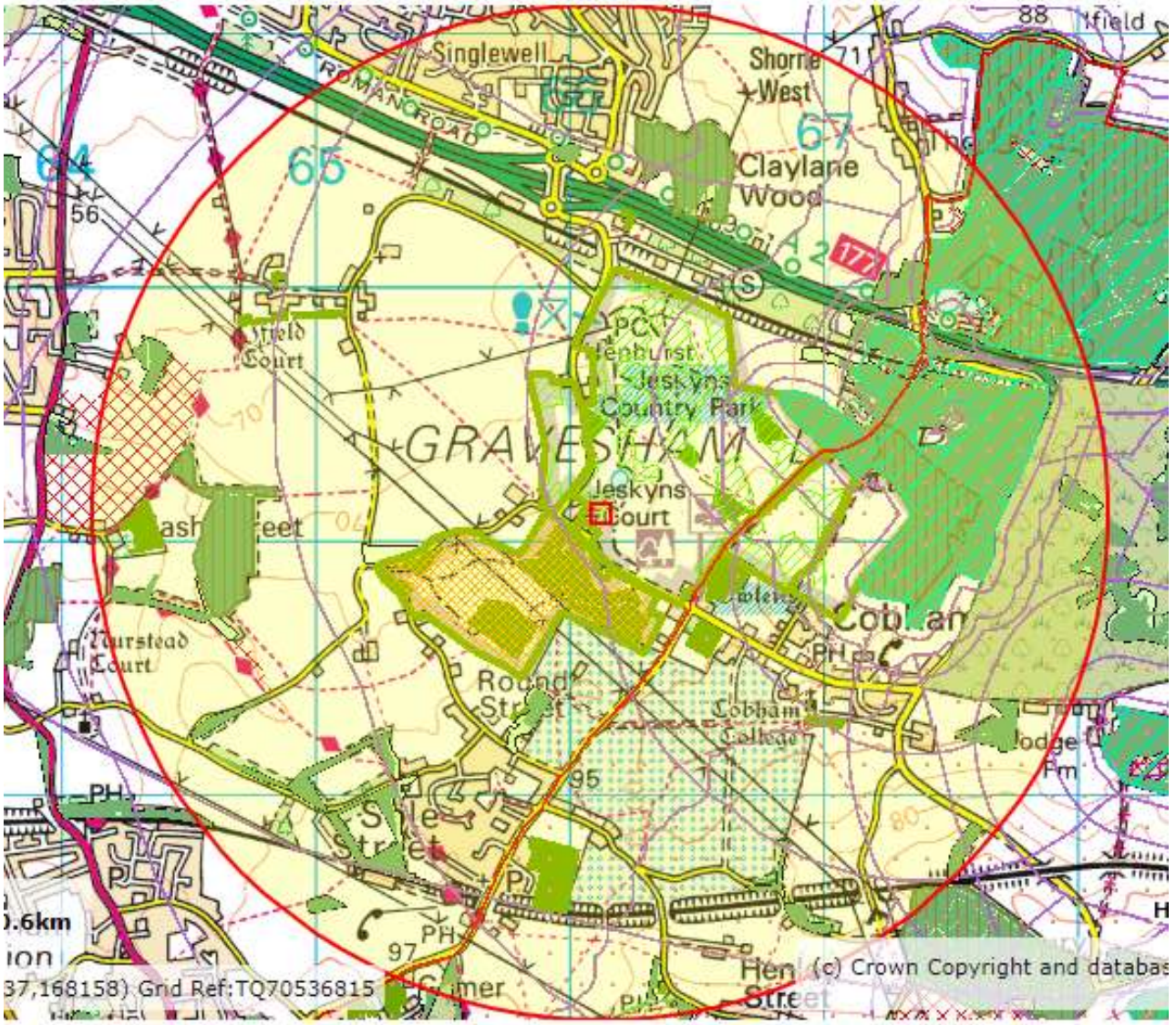


14.4 Forestry England Map of Protected Species



14.5 MAGIC Map

2km search radius



14.6 QGIS Maps of protected species

14.6 1 All species within a 2km radius (site is demarcated by a red asterisk).



14.6.2 All records (individual species)

- Hare
- Dormouse
- Reptile
- Plant
- Moth
- Hedgehog
- Butterfly
- Bat
- Badger
- Amphibian



14.6.2 Records close to site

- Hare
- Dormouse
- Reptile
- Plant
- Moth
- Hedgehog
- Butterfly
- Bat
- Badger
- Amphibian



14.7 Key

	Abbreviated Designation	Full designation	Description
International	Bern1	Bern Convention Appendix 1	Special protection (`appropriate and necessary legislative and administrative measures`) for the plant taxa listed, including prohibition of deliberate picking, collecting, cutting, uprooting and, as appropriate, possession or sale.
International	Bern2	Bern Convention Appendix 2	Special protection (`appropriate and necessary legislative and administrative measures`) for the animal taxa listed, including all forms of deliberate capture and keeping and deliberate killing; the deliberate damage to or destruction of breeding or resting place
International	Bern3	Bern Convention Appendix 3	Special protection through 'appropriate and necessary legislative and administrative measures', of the listed wild fauna species.
International	BD1	Birds Directive Annex 1	Birds which are the subject of special conservation measures concerning their habitat in order to ensure their survival and reproduction in their area of distribution. As appropriate, Special Protection Areas to be established to assist conservation measures.
International	BD2.1	Birds Directive Annex 2.1	Birds which may potentially be hunted under national legislation within the geographical land and sea area to which the Directive applies. (Note that some species are protected by the national legislation of some Member States although hunting would potentially be a separate issue).
International	BD2.2	Birds Directive Annex 2.2	Birds which may potentially be hunted under national legislation only within certain specified Member States. (Note that some species are protected by the national legislation of some Member States although hunting would potentially be legal under the Dir
International	BD3.1	Birds Directive Annex 3.1	Birds (or parts / derivatives of) which may be sold, kept for sale or transported for sale provided they have been legally killed, captured or otherwise legally acquired (see Article 6.1).
International	BD3.2	Birds Directive Annex 3.2	Birds (or parts / derivatives of) which may be sold, kept for sale or transported for sale provided they have been legally killed, captured or otherwise legally acquired provided authorisation has been granted by the relevant Member State (see Article 6.2
International	BD3.3	Birds Directive Annex 3.3	Birds which, in 1979, the European Commission were charged under Article 6.4 with carrying out studies to assess the biological status of and the effects of marketing on such status. (Note this Annex is no longer operative, these studies having now been u
International	CMS_A1	Convention on Migratory Species, Appendix 1	Endangered migratory species in danger of extinction throughout all or a significant portion of their range, and for which Range States are obliged to prohibit taking and to take protective measures to conserve. (Note that taking may be permitted in some
International	CMS_A2	Convention on Migratory Species, Appendix 2	Migratory species having an unfavourable conservation status for which Range States are encouraged to conclude international agreements for their benefit.
International	CMS_AEWA-A2	Convention on Migratory Species, African-Eurasian Waterbirds Agreement - Annex II	Conservation of migratory waterbirds, giving special attention to endangered species as well as to those with an unfavourable conservation status.
International	CMS_ASCOBANS	Convention on Migratory Species, Small Cetaceans Agreement, Baltic, NE.Atlantic, Irish, N Seas	Conservation of small cetacean species to achieve favourable conservation status, conscious that the management of threats to their existence, such as bycatch, habitat deterioration and other anthropogenic disturbance, requires concerted and coordinated r
International	CMS_EUROBATS-A1	Convention on Migratory Species, EUROBATS - Annex I	Protection and enhancement of species populations through legislation, education, conservation measures and international co-operation.
International	CITESA	EC CITES Annex A	All CITES Appendix I species. Some CITES Appendix II and III species, for which the EU has adopted stricter domestic measures. Some non-CITES species.

International	CITESB	EC CITES Annex B	All other CITES Appendix II species not listed in Annex A.Some CITES Appendix III species. Some non-CITES species.
International	CITESC	EC CITES Annex C	All other CITES Appendix III species not listed in Annex A or Annex B.
International	CITESD	EC CITES Annex D	Some CITES Appendix III species for which the EU holds a reservation (CITES reservations - English, French, Spanish). Some non-CITES species.
International	HSD2np	Habitats Directive Annex 2 - priority species	Species which are endangered, the conservation of which the Community has a particular responsibility in view of the proportion of their natural range which falls within the territory of the Community. They require the designation of special areas of cons
International	HSD2p	Habitats Directive Annex 2 - non-priority species	Animal and plant species of Community interest (i.e. endangered, vulnerable, rare or endemic in the European Community) whose conservation requires the designation of special areas of conservation. Note that the contents of this annex have been updated in
International	HSD4	Habitats Directive Annex 4	Animal and plant species of Community interest (i.e. endangered, vulnerable, rare or endemic in the European Community) in need of strict protection. They are protected from killing, disturbance or the destruction of them or their habitat. Note that the c
International	HSD5	Habitats Directive Annex 5	Animal and plant species of Community interest whose taking in the wild and exploitation may be subject to management measures.
International	OSPAR	OSPAR Convention	OSPAR Convention for the Protection of the Marine Environment of the North-East Atlantic. OSPAR List of Threatened and/or Declining Species and Habitats.
Nat Legislation	PBA	Protection of Badgers Act 1992	An Act to consolidate the Badgers Act 1973, the Badgers Act 1991 and the Badgers (Further Protection) Act 1991. Prohibits the wilful injuring, killing or taking of badgers, except as permitted by or under the Act.
Nat Legislation	Sect.41	Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec	Species “of principal importance for the purpose of conserving biodiversity” covered under section 41 (England) of the NERC Act (2006) and therefore need to be taken into consideration by a public body when performing any of its functions with a view to c
Nat Legislation	HabRegs2	The Conservation (Natural Habitats, &c.) Regulations 2010 (Schedule 2)	Schedule 2- European protected species of animals.
Nat Legislation	HabRegs4	The Conservation (Natural Habitats, &c.) Regulations 2010 (Schedule 4)	Schedule 4- Animals which may not be taken or killed in certain ways
Nat Legislation	HabRegs5	The Conservation (Natural Habitats, &c.) Regulations 2010 (Schedule 5)	Schedule 5- European protected species of plants.
Nat Legislation	ScotBL	Scottish Biodiversity List of species of principal importance for biodiversity conservation	The Scottish Biodiversity List is a list of flora, fauna and habitats considered by the Scottish Ministers to be of principal importance for biodiversity conservation. The development of the list has been a collaborative effort involving a great many stak
Nat Legislation	WO1i	The Wildlife (Northern Ireland) Order 1985 (Schedule 1 Part 1)	Birds which are protected by special penalties at all times.
Nat Legislation	WO1ii	The Wildlife (Northern Ireland) Order 1985 (Schedule 1 Part 2)	Birds which are protected by special penalties during the close season.
Nat Legislation	WO2i	The Wildlife (Northern Ireland) Order 1985 (Schedule 2 Part 1)	Birds which may be killed or taken outside the close season.
Nat Legislation	WO2ii	The Wildlife (Northern Ireland) Order 1985 (Schedule 2 Part 2)	Birds which may be killed or taken by authorised persons at all times. This has now been deleted and no longer applies: the provision of this part is covered by General Licences issued annually.
Nat Legislation	WO3	The Wildlife (Northern Ireland) Order 1985 (Schedule 3)	Birds which may be sold dead at all times.

Nat Legislation	WO4	The Wildlife (Northern Ireland) Order 1985 (Schedule 4)	Birds which may be shown for competitive purposes.
Nat Legislation	WO5	The Wildlife (Northern Ireland) Order 1985 (Schedule 5)	Animals which are protected at all times.
Nat Legislation	WO6	The Wildlife (Northern Ireland) Order 1985 (Schedule 6)	Animals which may not be killed or taken by certain methods.
Nat Legislation	WO7	The Wildlife (Northern Ireland) Order 1985 (Schedule 7)	Animals which may be sold alive or dead at any time.
Nat Legislation	WO8i	The Wildlife (Northern Ireland) Order 1985 (Schedule 8 - Part 1)	Plants which are protected from intentional picking, removal or destruction and from selling (in whole or part) and from advertising for sale.
Nat Legislation	WO8ii	The Wildlife (Northern Ireland) Order 1985 (Schedule 8 - Part 2)	Plants which may not be sold.
Nat Legislation	WO9i	The Wildlife (Northern Ireland) Order 1985 (Schedule 9 - Part 1)	Animals which established in the wild but may not be released from captivity.
Nat Legislation	WO9ii	The Wildlife (Northern Ireland) Order 1985 (Schedule 9 - Part 2)	Plants which may not be caused to grow in the wild.
Nat Legislation	WCA1i	Wildlife and Countryside Act 1981 (Schedule 1 Part 1)	Birds which are protected by special penalties at all times.
Nat Legislation	WCA1ii	Wildlife and Countryside Act 1981 (Schedule 1 Part 2)	Birds which are protected by special penalties during the close season.
Nat Legislation	WCA2i	Wildlife and Countryside Act 1981 (Schedule 2 Part 1)	Birds which may be killed or taken outside the close season.
Nat Legislation	WCA2ii	Wildlife and Countryside Act 1981 (Schedule 2 Part 2)	Birds which may be killed or taken by authorised persons at all times.
Nat Legislation	WCA3i	Wildlife and Countryside Act 1981 (Schedule 3 Part 1)	Birds which may be sold alive at all times if ringed and bred in captivity.
Nat Legislation	WCA3ii	Wildlife and Countryside Act 1981 (Schedule 3 Part 2)	Birds which may be sold dead at all times.
Nat Legislation	WCA3iii	Wildlife and Countryside Act 1981 (Schedule 3 Part 3)	Birds which may be sold dead from 1st September to 28th February.
Nat Legislation	WCA4	Wildlife and Countryside Act 1981 (Schedule 4)	Birds which must be registered and ringed if kept in captivity.
Nat Legislation	WCA5/9.1(kill/injuring)	Wildlife and Countryside Act 1981 (Schedule 5 Section 9.1 (killing/injuring))	Section 9.1. Animals which are protected from intentional killing or injuring.
Nat Legislation	WCA5/9.1(taking)	Wildlife and Countryside Act 1981 (Schedule 5 Section 9.1 (taking))	Section 9.1 Animals which are protected from taking.
Nat Legislation	WCA5/9.2	Wildlife and Countryside Act 1981 (Schedule 5 Section 9.2)	Section 9.2 Animals which are protected from being possessed or controlled (live or dead).
Nat Legislation	WCA5/9.4a	Wildlife and Countryside Act 1981 (Schedule 5 Section 9.4a)	Section 9.4 Animals which are protected from intentional damage or destruction to any structure or place used for shelter or protection.

Nat Legislation	WCA5/9.4b	Wildlife and Countryside Act 1981 (Schedule 5 Section 9.4b)	Section 9.4 Animals which are protected from intentional disturbance while occupying a structure or place used for shelter or protection.
Nat Legislation	WCA5/9.5a	Wildlife and Countryside Act 1981 (Schedule 5 Section 9.5a)	Section 9.5 Animals which are protected from being sold, offered for sale or being held or transported for sale either live or dead, whole or part.
Nat Legislation	WCA5/9.5b	Wildlife and Countryside Act 1981 (Schedule 5 Section 9.5b)	Section 9.5 Animals which are protected from being published or advertised as being for sale.
Nat Legislation	WCA5/9.4A*	Wildlife and Countryside Act 1981 (Schedule 5)	Ceteaca/basking shark that are not allowed to be intentionally or recklessly disturbed.
Nat Legislation	WCA5/9.4c	Wildlife and Countryside Act 1981 (Schedule 5)	Animals which are protected from their access to any structure or place which they use for shelter or protection being obstructed.
Nat Legislation	WCA6	Wildlife and Countryside Act 1981 (Schedule 6)	Animals which may not be killed or taken by certain methods.
Nat Legislation	WCA8	Wildlife and Countryside Act 1981 (Schedule 8)	Plants which are protected from intentional picking, uprooting or destruction (Section 13 1a); selling, offering for sale, possessing or transporting for the purpose of sale (live or dead, part or derivative) (Section 13 2a); advertising (any of these) fo
Nat Legislation	WCA9i	Wildlife and Countryside Act 1981 (Schedule 9 Part 1)	Animals which may not be released or allowed to escape into the wild.
Nat Legislation	WCA9ii	Wildlife and Countryside Act 1981 (Schedule 9 Part 2)	Plants which may not be planted or caused to grow in the wild.
Nat Legislation	Sect.42	Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in Wales (secti	Species “of principal importance for the purpose of conserving biodiversity” covered under Section 42 (Wales) of the NERC Act (2006) and therefore need to be taken into consideration by a public body when performing any of its functions with a view to con
New NBIS List	Breck_Special	Breckland Specialists	Species identified as Breckland specialits by the Breckland Biodiversity audit 2010
New NBIS List	NRPl	Norfolk Rare Plants	Norfolk rare plants as identified by BSBI County recorder Bob Ellis
Other rare/scarce	FEP1	Farm Environment Plan Guidance 001	Species is listed in the DEFRA document 'Environmental Stewardship Farm Environment Plan Guidance 001: Hedgerow Woody Species (from Schedule 3 of Hedgerow Regulations 1997)'.
Other rare/scarce	FEP7/2	Farm Environment Plan Guidance 007- Table 2	Species is listed in 'Table 2: Farm Environment Plan Species to be recorded in Part 2 of the FEP' of the DEFRA document 'Environmental Stewardship Farm Environment Plan Guidance 007: Plant & animal species in the Farm Environment Plan (FEP)'.
Other rare/scarce	FEP7/3	Farm Environment Plan Guidance 007- Table 3	Species is listed in 'Table 3: High Value Arable Margin Indicator Species' of the DEFRA document 'Environmental Stewardship Farm Environment Plan Guidance 007: Plant & animal species in the Farm Environment Plan (FEP)'.
Other rare/scarce	NRMar	Nationally rare marine species	Species which occur in eight or fewer 10km X 10km grid squares containing sea (or water of marine saline influence) within the three mile territorial limit.
Other rare/scarce	NSMar	Nationally scarce marine species	Species which occur in nine to 55 10km X 10km grid squares containing sea (or water of marine saline influence) within the three mile territorial limit.
Other rare/scarce	N	Nationally Notable	Species which are estimated to occur within the range of 16 to 100 10km squares. (subdivision into Notable A and Notable B is not always possible because there may be insufficient information available). Superseded by Nationally Scarce, and therefore no l

Other rare/scarce	NA	Nationally Notable A	Taxa which do not fall within RDB categories but which are none-the-less uncommon in Great Britain and thought to occur in 30 or fewer 10km squares of the National Grid or, for less well-recorded groups, within seven or fewer vice-counties. Superseded by
Other rare/scarce	NB	Nationally Notable B	Taxa which do not fall within RDB categories but which are none-the-less uncommon in Great Britain and thought to occur in between 31 and 100 10km squares of the National Grid or, for less-well recorded groups between eight and twenty vice-counties. Super
Other rare/scarce	NR-excludes	Nationally rare. Excludes Red Listed taxa	Occurring in 15 or fewer hectads in Great Britain. Excludes rare species qualifying under the main IUCN criteria.
Other rare/scarce	NS-excludes	Nationally scarce. Excludes Red Listed taxa	Occurring in 15 or fewer hectads in Great Britain. Excludes rare species qualifying under the main IUCN criteria.
Red Data List	BAmb	Bird Population Status - amber	Amber list species are those with an unfavourable conservation status in Europe; those whose population or range has declined moderately in recent years; those whose population has declined historically but made a substantial recent recovery; rare breeder
Red Data List	BRed	Bird Population Status - red	Red list species are those that are Globally Threatened according to IUCN criteria; those whose population or range has declined rapidly in recent years; and those that have declined historically and not shown a substantial recent recovery.
Red Data List	RLGB.CR	IUCN (2001) - Critically endangered	A taxon is Critically Endangered when it is facing an extremely high risk of extinction in the wild in the immediate future, as defined by any of the criteria A to E.
Red Data List	RLGB.DD	IUCN (2001) - Data Deficient	A taxon is Data Deficient when there is inadequate information to make a direct, or indirect, assessment of its risk of extinction based on its distribution and/or population status. A taxon in this category may be well studied, and its biology well known
Red Data List	RLGB.EN	IUCN (2001) - Endangered	A taxon is Endangered when it is not Critically endangered but is facing a very high risk of extinction in the wild in the near future.
Red Data List	RLGB.EW	IUCN (2001) - Extinct in the wild	A taxon is Extinct in the wild in Great Britain when it is known to survive only in cultivation, in captivity or as a naturalised population (or populations) well outside the past range. A taxon is presumed extinct in the wild when exhaustive surveys in k
Red Data List	RLGB.EX	IUCN (2001) - Extinct	A taxon is Extinct in Great Britain when there is no reasonable doubt that the last individual in Great Britain has died. A taxon is presumed extinct when exhaustive surveys in known and/or expected habitat, at appropriate times (diurnal, seasonal, annual
Red Data List	RLGB.NT	IUCN (2001) - Lower risk - near threatened	Taxa which do not qualify for Lower Risk (conservation dependent), but which are close to qualifying for Vulnerable. In Britain, this category includes species which occur in 15 or fewer hectads but do not qualify as Critically Endangered, Endangered or V
Red Data List	RLGB.RE	IUCN (2001) - Regionally Extinct	Category for a taxon when there is no reasonable doubt that the last individual potentially capble of reproduction within the region has died or has disappeared from the wild in the region, or when, if it is a former visiting taxon, the last individual ha
Red Data List	RLGB.VU	IUCN (2001) - Vulnerable	A taxon is Vulnerable when it is not Critically Endangered or Endangered but is facing a high risk of extinction in the wild in the medium term future.
Red Data List	RLGB.CR	IUCN (1994) - Critically endangered	A taxon is Critically Endangered when it is facing an extremely high risk of extinction in the wild in the immediate future, as defined by any of the criteria A to E.
Red Data List	RLGB.DD	IUCN (1994) - Data Deficient	A taxon is Data Deficient when there is inadequate information to make a direct, or indirect, assessment of its risk of extinction based on its distribution and/or population status. A taxon in this category may be well studied, and its biology well known

Red Data List	RLGB.EN	IUCN (1994) - Endangered	A taxon is Endangered when it is not Critically endangered but is facing a very high risk of extinction in the wild in the near future.
Red Data List	RLGB.EX	IUCN (1994) - Extinct	Taxa which are no longer known to exist in the wild after repeated searches of their localities and other known likely places.Superseded by new IUCN categories in 1994, but still applicable to lists that have not been reviewed since 1994.
Red Data List	RLGBLr(NT)	IUCN (1994) - Lower risk - near threatened	Taxa which do not qualify for Lower Risk (conservation dependent), but which are close to qualifying for Vulnerable. In Britain, this category includes species which occur in 15 or fewer hectads but do not qualify as Critically Endangered, Endangered or V
Red Data List	RLGB.VU	IUCN (1994) - Vulnerable	A taxon is Vulnerable when it is not Critically Endangered or Endangered but is facing a high risk of extinction in the wild in the medium term future.
Red Data List	RDBGB.EN	IUCN (pre 1994) - Endangered	Taxa in danger of extinction and whose survival is unlikely if the causal factors continue operating. Superseded by new IUCN categories in 1994, but still applicable to lists that have not been reviewed since 1994.
Red Data List	RDBGB.EX	IUCN (pre 1994) - Extinct	Taxa which are no longer known to exist in the wild after repeated searches of their localities and other known likely places.Superseded by new IUCN categories in 1994, but still applicable to lists that have not been reviewed since 1994.
Red Data List	RDBGB.Inde	RDB - Indeterm	Taxa not seen since 1970 but require further survey before they can be declared extinctknown to be Extinct, Endangered, Vulnerable or Rare, but where there is not enough information to say which of these categories is appropriate. Superseded by new IUCN c
Red Data List	RDBGB.Insu	RDB - Insuff known	Taxa that are suspected but not definitely known to belong to any of the above categories (i.e. Endangered, Vulnerable, Rare), because of the lack of information. Superseded by new IUCN categories in 1994, so no longer in use.
Red Data List	RDBGB.R	IUCN (pre 1994) - Rare	Taxa with small populations that are not at present Endangered or Vulnerable, but are at risk. (In GB, this was interpreted as species which exist in fifteen or fewer 10km squares). Superseded by new IUCN categories in 1994, but still applicable to lists
Red Data List	RDBGB.Thre	RDB - Threatened endemic	Taxa which are not known to occur naturally outside Britain. Taxa within this category may also be in any of the other RDB categories or not threatened at all.
Red Data List	RDBGB.VU	IUCN (pre 1994) - Vulnerable	Taxa believed likely to move into the Endangered category in the near future if the causal factors continue operating. Superseded by new IUCN categories in 1994, but still applicable to lists that have not been reviewed since 1994.
Red Data List	RLGLB.CR	IUCN (2001) - Critically endangered	A taxon is Critically Endangered when the best available evidence indicates that it meets any of the criteria A to E for Critically Endangered (see Section V), and it is therefore considered to be facing an extremely high risk of extinction in the wild.
Red Data List	RLGLB.EN	IUCN (2001) - Endangered	A taxon is Endangered when the best available evidence indicates that it meets any of the criteria A to E for Endangered (see Section V), and it is therefore considered to be facing a very high risk of extinction in the wild.
Red Data List	RLGLB.VU	IUCN (2001) - Vulnerable	A taxon is Vulnerable when the best available evidence indicates that it meets any of the criteria A to E for Vulnerable (see Section V), and it is therefore considered to be facing a high risk of extinction in the wild.
Red Data List	RLGLB.DD	IUCN (2001) - Data Deficient	A taxon is Data Deficient when there is inadequate information to make a direct, or indirect, assessment of its risk of extinction based on its distribution and/or population status. A taxon in this category may be well studied, and its biology well known

Red Data List	RLGLB.EX	IUCN (2001) - Extinct	A taxon is Extinct when there is no reasonable doubt that the last individual has died. A taxon is presumed Extinct when exhaustive surveys in known and/or expected habitat, at appropriate times (diurnal, seasonal, annual), throughout its historic range h
Red Data List	RLGLB.NT	IUCN (2001) - Lower risk - near threatened	A taxon is Near Threatened when it has been evaluated against the criteria but does not qualify for Critically Endangered, Endangered or Vulnerable now, but is close to qualifying for or is likely to qualify for a threatened category in the near future.
Red Data List	RLGLB.CR	IUCN (1994) - Critically endangered	A taxon is Critically Endangered when it is facing an extremely high risk of extinction in the wild in the immediate future, as defined by any of the criteria A to E.
Red Data List	RLGLB.DD	IUCN (1994) - Data Deficient	A taxon is Data Deficient when there is inadequate information to make a direct, or indirect, assessment of its risk of extinction based on its distribution and/or population status. A taxon in this category may be well studied, and its biology well known
Red Data List	RLGLB.EN	IUCN (1994) - Endangered	Taxa in danger of extinction and whose survival is unlikely if the causal factors continue operating. Superseded by new IUCN categories in 1994, but still applicable to lists that have not been reviewed since 1994.
Red Data List	RLGLB.LR(cd)	IUCN (1994) - Lower risk - conservation dependent	Taxa which are the focus of a continuing taxon-specific or habitat-specific conservation programme targeted towards the taxon in question, the cessation of which would result in the taxon qualifying for one of the threatened categories above within a peri
Red Data List	RLGLB.NT	IUCN (1994) - Lower risk - near threatened	Taxa which do not qualify for Lower Risk (conservation dependent), but which are close to qualifying for Vulnerable. In Britain, this category includes species which occur in 15 or fewer hectads but do not qualify as Critically Endangered, Endangered or V
Red Data List	RLGLB.VU	IUCN (1994) - Vulnerable	Taxa believed likely to move into the Endangered category in the near future if the causal factors continue operating. Superseded by new IUCN categories in 1994, but still applicable to lists that have not been reviewed since 1994.
UK BAP	UKBAP	UK Biodiversity Action Plan priority species	The UK List of Priority Species and Habitats contains 1150 species and 65 habitats that have been listed as priorities for conservation action under the UK Biodiversity Action Plan (UK BAP).

REPORT ENDS

Appendix 3

Construction Environment Management Plan

Construction Environment Management Plan: Biodiversity

Jeskyns Farm, Gravesend, Kent

Anglian Ecology: Protected Species & Habitat Surveys

www.anglianecology.co.uk

1, Red House Farm Cottage, Pixey Green, Stradbroke, Suffolk, IP21 5NJ

sue@anglianecology.co.uk 07753406866

CONSTRUCTION ENVIRONMENT MANAGEMENT PLAN: BIODIVERSITY

Version and Status	Date Produced	Client and client contact:	Written/Updated by:	Survey Licence No. (If applicable)	Authorised and checked by/ Date
1	18/08/2022	Forestry England	Sue Morgan CEcol, CEnv	N/A	FM 19/08/2022
		Duncan Slade **Duncan Slade MRICS** Assistant Area Land Agent **Forestry England** East England Forest District Office Santon Downham | Brandon | Suffolk | IP27 0TJ ///treetop.goggle.intruders T: 0300 067 4903 M: 07920 781507 E: duncan.slade@forestryengland.uk			

The information that I have prepared and provided is true and has been prepared in accordance with the guidance of my professional institutes. I therefore confirm that the opinions expressed are my true and professional opinions.

Sue Morgan CEnv, MIEMA, CEcol, MCIEEM Senior Ecologist, Anglian Ecology.



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1 Introduction

1.1 Purpose of CEMP

Anglian Ecology has been commissioned by Mr. Duncan Slade (MRICS, Assistant Area Land Agent), on behalf of Forestry England to produce a Construction Environment Management Plan (CEMP) for the protection of biodiversity and ecological features during the proposed construction of a new office building at Jeskyns Farm, Gravesend Kent.

This CEMP refers exclusively to biodiversity and ecological features and other aspects such as noise, lighting, traffic movements, and air quality are not within the remit of this report.

The proposal is to create a purpose-built facility to support the operational forestry work of Forestry England in managing this site and surrounding parts of the forest estate by providing mess facilities and administration space of approximately 195m2 of floor space.

For full details of the site proposals please see the accompanying architect's plans.

This CEMP is designed to ensure the protection and ongoing ecological viability of species utilising the site both during and after works, and to ensure the protection of valuable habitat. Where 100% retention of habitat is not possible, the aim is to ensure appropriate mitigation and compensation.

The CEMP promotes biodiversity net gain and outlines the enhancement measures which should be adopted with specific details within the appendix.

The information plan supplied at the time of writing include:

1.JESKYNS - Annotated Site Plan Scale @ A3: 1:500 Date: 14 October 2021 Author: Duncan Slade MRCIS.

2.Jeskyns – Site Working Area, Scale 1:500, Duncan Slade, 06-08-2021

3./Jeskyns Location Plan, Scale 1:1,250, Duncan Slade 13-08-202

Recommendations within this report relate to the information provided by the client at the time of writing, any subsequent proposal changes may alter these recommendations and proposed mitigation or enhancement measures.

1.2 Site location

NGR at Site centre: TQ 66122 69114

Address: Jeskyns Farm Jeskyns road, Gravesend, DA12 3AL

Location is marked by the red arrow on the map below.



1.3 Ecological findings and background

The following surveys have been undertaken on this site

1. A Preliminary Ecological Appraisal[1]

2. Preliminary Bat Roost Assessment of 23 Trees and 12 Silos [2]

- The wider site area is a relatively small (3574m²) and consists largely of a central hardstanding yard, with modern metal barns to the east, all of which are to remain unaffected by the proposals, and two disused arrays of former grain silos to the east and south, some of which will be removed.

- The office is to be situated to the northeast section of the site (as indicated on the accompanying architects' plans). The hardstanding area of proposed works measures approximately 17m x 28m. The new building will be situated on a north/south axis, and only occupy approximately 195m² at the centre of this area which is currently used for parking. Adjoining this area is a slight grassy uphill rise to the south on the fringe of a wooded area.

- There are areas of close- mown improved grassland to the east and west margins. There is a line of tall ruderals abutting the post and rail fencing of the adjoining tree nursery area to the east.

- To the southeast corner is a gate into the tree nursery area and stacked stone flags, and to the central south is a mature hornbeam *(Carpinus betula)* and a mature silver birch *(Betula pendula)* at either side of the grassy rise into the wooded area.

- On the grassy site margin to the west are piles of shale and shingle and stored timber, with one monolith, together with offcuts, a metal skip, and agricultural machinery.

- To the north is the tarmacked east access road.

- To the immediate west of the proposed site is a range of fencing and 4 silos which are to be removed. There was no evidence of protected species use of these silos or the areas immediately around them.

[1] Preliminary Ecological Appraisal of: Land at Jeskyns Farm, Gravesend, Kent Anglian Ecology, October 2021

[2] Preliminary Ground -Based Assessment of Potential Bat Roosts in Trees and Silos at: Jeskyns Farm, Jeskyns Road, Gravesend, Kent, Anglian Ecology March 2022.

- To the south beyond the grassy rise is a small, wooded area. This wood is dominated by mature field maple *(Acer campestre),* with beech *(Fagus sylvatica)* and some very mature yew *(Taxus baccata*, and a common nettle *(Urtica dioica)* dominant verge and understorey. It has a close mown grass verge of improved grassland to the south and a pathway along the edge of the fenced silo area to the north. There is a small spring to the western end which trickles across into the silo area creating a wet habitat. This woodland will be unaffected by works.

- Forestry England obtained records for protected species and sites, birds, and invasive species from Kent and Medway Biological Record Office. There are 181 records of protected species within a 2km radius of the site and 1327 records for birds.

- The nearest recordings are for three equidistant records for different species all from 150m away: Grass snake *(Natrix helvetica),* dated 2020, to the northeast, common frog *(Rana temporaria),* dated 2012 to the northeast, and common pipistrelle *(Pipistrellus pipistrellus)* to the south, dated 2007.

- Other records within the 2km search radius obtained in house by Forestry England are for brown hare (*Lepus Europaeus),* flowering plants, badger *(Meles meles),* common toad *(Bufo bufo),* moth, butterfly, hedgehog *(Erinaceus europaeus),* adder *(Vipera berus),* at least six species of bat, 56 records for dormouse *(Muscardinus avellanarius),* and one old record for great crested newt *(Triturus cristatus)*.

- No records pertained directly to the site area, but many records are to grid square accuracy only and there are records for bats, many birds, badger, and brown hare, reptiles, amphibians, and dormouse within 1km.

- Close to the site lie species -rich hedgerows, and bands of woodland bordering the site to the north, west, and east. These areas will be habitat for protected species such as bats and small mammals.

- There is a pond 80m to the west of the proposed site area, located in woodland beyond the west site boundary, and approximately 90m to the north of the site lies Henhurst Lake and a further lake, to the northeast. The site has ecological continuity with Jeskyns Community Woodland area.

CONSTRUCTION ENVIRONMENT MANAGEMENT PLAN: BIODIVERSITY

- It is understood that the proposals do not necessitate the removal or pruning of any trees or hedgerows, save for the following:

1. Some trimming back of branches to accommodate the building and the possible removal of one alder *(Alnus glutinosa)* tree (T23 on the PRF Assessment).

2. The removal of some scrub elder *(Sambucus nigra)* trees in the immediate area of the grain silos to facilitate their removal.

- The site lies within the SSSI Impact Zones[3] of Shorne and Ashenbank Woods SSSI 800m to the east, Cobham woods SSSI 2.1km to the east, and Great Crabbles Wood SSSI 3.9km to the northeast.

- The site lies 400m to the east of the Kent Downs Area of Outstanding Natural Beauty

- The site is within the Green Belt around Gravesend. (London Area Greenbelt, Local Authority: Gravesham District (B) Area (Ha)7663.87761).

- There are two County Wildlife Sites within a 2km radius, neither of which border or have close ecological continuity with the site.

- There are areas of Priority Habitats within 2km, none of which will be affected by the proposed works. The nearest Priority Habitat is National Forest Inventory, Category: Woodland, Interpreted Forest Type: Broadleaved, 65m to the south, and Traditional Orchards 65m to the south.

- The wider site contains a number of mature trees. All mature trees situated close to the site or access routes will need appropriate protection.

- A Potential Bat Roost Assessment has been conducted on this site and the recommendations of this report must be followed.

[3] SSSI Impact Zone SSSI Impact Risk Zones - to assess planning applications for likely impacts on SSSIs/SACs/SPAs & Ramsar sites

CONSTRUCTION ENVIRONMENT MANAGEMENT PLAN: BIODIVERSITY

- The site is currently a treed quiet area with little or no external night lighting. It is likely to be part of a bat commuting/foraging corridor. No lighting should affect this corridor either before, during or after works.

- Areas of overgrown scrub and tall ruderals are potential nesting and refugia sites for a wide variety of small mammals, amphibians, reptiles, and birds. There are a number of natural refugia sites amidst piles of brash and logs.

- The area of proposed works contains minimal invertebrate habitat it being largely composed of hardstanding and close mown grass. Some narrow marginal invertebrate habitats can be found to the margins east, west and south.

- There is some, very limited, reptile habitat for lizard *(Zootoca vivipara),* slow worm *(Anguis fragilis),* grass snake and adder *(Vipera berus)* on site – mainly to the grassy margins and wooded fringe area to the south.

- The wider site area has habitat for breeding birds, none of which will be disturbed. Several breeding birds and birds' nests were observed on site including blackbird *(Turdus merula),* wren *(Troglodytes troglodytes*), and chaffinch *(Fringilla coelebs)*.There is a remote possibility that ground nesting birds may be present on site, but they are unlikely to be present in the areas of works.

- There is habitat for frogs, newts *(Lissotriton vulgaris)*and great crested newt) and toads *(Bufo bufo)* among these areas and amongst the long vegetation and woodland areas, but minimal habitat within the location of the proposed new office building or on the plant access roads and hardstanding.

- Of special note are the 46 records of hazel dormouse, (45 records dated between 2018 -2020. the nearest being 630m to the north). Whilst there is habitat for this species to the margins of the site area, no hedgerow or woodland is scheduled for removal or works, however, its presence locally is important to be aware of in case of the low possibility it may be encountered during works.

- There was no evidence of badgers on site. However, this species has a presence in the wider area (six records within 2Km, the nearest being 900m to the east dated 2017and could potentially be present on the site at times.

- No plant species of note were observed within the proposed site area.

CONSTRUCTION ENVIRONMENT MANAGEMENT PLAN: BIODIVERSITY

To summarise, the site proposals could potentially indirectly or directly affect the following species to varying degrees:

- Bats
- invertebrates
- Amphibians
- Reptiles
- Breeding birds
- Badgers
- Brown hare
- Dormouse (and other small mammals)

And will or could affect the following habitats:

- Mature and semi-mature trees
- Sapling and scrub
- Areas of tall ruderals/ shrub borders/ improved grassland.

Currently the proposed works are relatively minor in scale and confined to areas of low impact (i.e. existing hardstanding or short grass), and foundations are shallow, it is therefore considered that the construction of the new office and associated services will have a minimal impact of the biodiversity and very low potential impact on any protected species so long as the conditions within this CEMP report are followed.

2 Conditions

2.1 Risk assessment of potentially damaging construction activities.

Table 1 below provides a risk assessment of the potential impacts on protected species and habitats that may result from the proposed development.

A suitably qualified ecologist must be appointed to supervise the implementation of this CEMP in an Ecological Clerk of Works (ECoW) role. Further information on this role is given below. As part of the role the EcoW must create a Reasonable Avoidance Methodology Statement (RAMS) the requirements of which all contractors must be made aware of in a Toolbox Talk and must thereafter sign to signify their understanding and commitment to follow at all times.

CONSTRUCTION ENVIRONMENT MANAGEMENT PLAN: BIODIVERSITY

Table 1 Risk Assessment

Receptor	Source of impact	Mitigation During Proposed Works and compensation measures	Risk with Mitigation	Timing of Proposed works
Mature and semi-mature trees	Heavy plant movements Both on the ground and from height. Impaction Root disturbance/ damage Spoil/ storage of materials/chemicals Removal/ pruning/clearance	No mature trees are scheduled for removal on this site except 1 mature alder (T 23, identified as having a 'low' potential to support roosting bat species in the Potential Bat Roost Assessment[4]). T23 will require no further inspection prior to removal unless felled between February – October when they will require a breeding bird check. The elder within the silo compound were also assessed as having a 'low' potential to support roosting bat species and require no further inspection prior to removal unless felled between February – October when they will require a breeding bird check. All trees on or within close proximity to the site must be given root protection in accordance with BS5837:2012 Trees in relation to design, demolition, and construction which site contractors must follow. All trees on or bordering the site, along the proposed foul drainage route, or the access routes must be protected by fencing and RPA's as appropriate. This fencing must not encroach into RPA areas to avoid damaging tree roots. Areas of young trees and scrub must be hand searched prior to removal by the ECoW before any clearance by mechanical means. Mature trees off site with canopies within the site must be afforded protection under BS5837:2012 as above. No plant movements should take place within the RPA of mature trees.	Low	Within first two weeks

[4] Anglian Ecology, March 2022

Scrub/tall ruderals	Removal/pruning/clearance	The removal of scrub or tall ruderals should be undertaken in two stages and only following best practice methodology as detailed by the accompanying Method Statement (please see appendix), after a hand-search by the ECoW, Any removal of shrubs or tall ruderals must be compensated for by the planting of new invertebrate friendly areas. This could be achieved by planting at least three native species, fruit-bearing, container-grown standard trees (1.2 - 1.8m tall) across the site, and additionally either: A) Submitting a detailed landscaping plan identifying the native species invertebrate-friendly planting which will included to the borders of the new office building. This must include at least eight varieties of native plants and cover an area proportional to the tall ruderal/ scrub clearance. Or B) Submitting plans for a designated 'wild area' within the site, again proportional to the area of scrub clearance/tall ruderals which will be lost. These habitat enhancement and compensation measures **must be incorporated at landscape design stage**	Low	Within first two weeks Within 3 months from completion
Improved grassland/ central site areas of strimmed vegetation	Ground clearance	This habitat is minimal in size and of low ecological value, but the storage of materials and plant movement must be restricted to designated hard-standing areas to protect all remaining grassy border areas. All border areas must be hand-searched by the ECoW immediately prior to any removal and best practise working methodology must be followed as detailed by the accompanying Method Statement (please see appendix).	Low	Within first two weeks

CONSTRUCTION ENVIRONMENT MANAGEMENT PLAN: BIODIVERSITY

Bats	Tree pruning, removal ,of alder and elder scrub (T23).	Any trees identified for pruning works must be re-checked for the presence /absence of bat species by the ECoW immediately prior to works. T23 does not require re-survey or inspection before felling regarding bat species but please see breeding birds below. The elder scrub within the silo compound does not require further surveyor inspection for bat species, but please see breeding birds below. All existing mature trees and hedgerows must remain protected and undisturbed (see above) and must remain unlit. No lighting should directly illuminate trees, or hedgerow lines. Lux levels must be kept low across the site.	Low	Immediately before works Permanent requirement Permanent requirement
Reptiles	Scrub and tall ruderals clearance, removal of silos, spoil heaps, foul drainage route works to the south etc.	All areas of potential reptile habitat such as compost, piles of spoil, logs, brash, banks of scrub and tall ruderals must be hand-searched by the ECoW immediately prior to clearance in two stages and thereafter managed to discourage reptiles using these areas for the duration of works. ECoW to re-check interior of silos and silo area prior to clearance. Best practise working methodology must be followed as detailed by the accompanying Method Statement (please see appendix).	Low	Immediately prior to works. Throughout duration of works.
Amphibians	Scrub and tall ruderals clearance, removal of silos, spoil heaps foul drainage route works to the south etc.	Best practise working methodology must be followed as detailed by the accompanying Method Statement (please see appendix). ECoW to re-check interior of silos and silo area prior to clearance.	Low	As above
Breeding Birds	Tree removal and pruning and scrub removal, removal of silos.	T23 (alder), any tree requiring pruning, and any elder scrub scheduled for removal must be checked for the presence of breeding birds by the ECoW immediately if works take place between March to October inclusive. ECoW to re-check interior of silos and silo area prior to clearance.	Low	Immediately prior to works.

Invertebrates	Tall ruderal, grassland, scrub, and tall ruderals.	All areas of habitat not scheduled for removal must be demarcated by protective fencing and remain undisturbed by machinery or site personnel. Best practise working methodology must be followed as detailed by the accompanying Method Statement (please see appendix). New invertebrate-friendly planting must be incorporated into the landscaping proposals and species must be agreed in conjunction with the ECoW before planting.	Low	As above (throughout duration of works).
Badgers	Groundworks, foul drainage route works to the south.	All groundworks should be back-filled before nightfall and preferably continuously as works progress. If pits or trenches cannot be filled, they should be covered with escape ramps. Open excavations must have ramps installed to allow any trapped mammal to find its way out. All excavations left open with escape ramps must be checked the following morning for the presence of any animal before works commence. Best practise working methodology must be followed as detailed by the accompanying Method Statement (please see appendix).	Low	On going Throughout duration of works. As above. As above.
Small mammals, hares, hedgehogs.	Groundworks, scrub, tall ruderal, and long grass clearance, removal of silos. Foul drainage route works to the south.	All clearance areas must be hand-searched by the ECoW immediately prior to removal by mechanical means. Tall ruderals must be cleared in two stages with a 24-hour gap between. Best practise working methodology must be followed as detailed by the accompanying Method Statement (please see appendix). ECoW to re-check interior of silos and silo area prior to clearance.	Low	Immediately prior to works
Dormice	Groundworks, scrub, tall ruderal, and long grass clearance, removal of silos. Foul drainage route works to the south.	The hedgerow bordering the proposed foul drainage route from the site area to the Jeskyns Road must be protected to the west with HERAS fencing to ensure there is no impact on potential dormouse habitat.	Low	Immediately prior to works.

2.2 Biodiversity Protection Zone

A Biodiversity Protection Zone (BPZ) has been designated on this site based upon the results of field surveys conducted.

This BPZ is identified in Plan 1 below.

The south woodland area (to be retained)is to be protected by tall 'HERAS' style fencing running along its length at least 5m from then woodland edge and further if accommodating RPA's for mature trees. The eastern hedgerow line is also to be protected by tall 'HERAS' style fencing running along its length at least 5m from the edge.

All mature trees to be retained must have fenced off root protection areas (RPA's) as detailed in BS5837:2012 to avoid any inadvertent damage by plant or chemical storage.

All trees to the west bordering the proposed foul drainage channel (running from the site area south to Jeskyns Road) must also receive root protection areas (RPA's) as detailed in BS5837:2012 , and the hedgerow bordering this proposed drainage route to the east must also be protected with HERAS fencing. Protection of hedgerows from the impact of works is particularly important on this site due to the potential local presence of dormice.

All other areas of habitat to be retained must be protected by substantial fencing which is clearly demarcated as protective fencing.

New habitat which is to be created such as areas of invertebrate friendly planting, must also be clearly demarcated prior to works commencing.

These new habitat areas will require a detailed species -specific and illustrated Landscape Proposals Plan which must be produced prior to works.

Plan 1 Biodiversity Protection Zones

Black BPZ line denotes requirements for HERAS -style protective fencing as detailed.



Plan 2 Biodiversity Protection Zone (delineated in red) satellite image

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2.3 Practical measures

Clearance of vegetation (improved grassland, scrub, tall ruderals), ground clearance and ground works (excavations, service -laying) will need to be undertaken to facilitate the development. This work has the potential to impact on protected flora and fauna if present.

A Method Statement detailing physical measures and sensitive working practices to avoid or reduce impacts during construction is provided within the appendix. In addition to these, the following is applicable:

2.3.1 Site fencing and site storage arrangements

- All construction sites are of necessity noisy and dusty places with large plant movements, temporary infra structures, chemical and equipment storage, rubble, brash, and many potential hazards.

- To ensure that no protected species or habitats are adversely affected by day-to day works areas of plant and chemical storage and the proposed location of all temporary infrastructure and plant machinery **must be identified and agreed with the ECoW before any works commence.**

- **All contractors must also be given a Toolbox Talk by the ECoW immediately before the commencement of works outlining the potential dangers caused by construction vehicles or chemicals.**

- No materials or plant to be stored within designated BPZ or RPA areas but are to be confined to pre-existing or created hard surface zones.

- No materials, plant, or temporary infrastructure to be situated within 10m of any boundary hedgerow or tree.

- Materials to be store off-ground on raised pallets at all times to minimise the chance of small mammals, reptiles or amphibians using these sites as a refugia.

- No burning of brash or waste on site. All waste to be placed in skips and removed from site regularly.

2.3.2 Clearance of vegetation (semi- improved grassland, trees, scrub, shrub beds, tall ruderals), ground clearance and ground works (excavations, and service -laying)

- Before any clearance works commence all contractual personnel must be made aware of the Method Statement detailing working procedures which minimise the risk of harm to any protected species and must be followed. A copy of this Method Statement is included within the appendix.

- The ECoW must deliver a Toolbox Talk to all contractual personnel and managers working on site on the day of clearance, it must be given to any new personnel who come to site.

- The talk will detail best working practice on sites where there is the potential to encounter a protected species and will outline the relevant legislation and any potential risks. A copy of this talk is to be found in the appendix.

- Staged clearance work should only be undertaken after all necessary hand searching has been completed by the ECoW and the area has been 'signed off' on the ECoW Daily Record Sheet. A copy of this sheet is to be found in the appendix.

- All groundworks should be back-filled before nightfall and preferably continuously as works progress.

- If pits or trenches cannot be filled, they should be covered with escape ramps. Open excavations must have ramps installed to allow any trapped mammal to find its way out.

- All excavations left open with escape ramps must be checked the following morning for the presence of any animal before works commence.

2.4 The location and timing of sensitive works to avoid harm to biodiversity features

Works are scheduled to commence on this site on ……..and to be complete by ……..

Table 2 below provides information for the timing of works to minimise the potential for disturbance or harm to a protected species.

Table 2 Timing of sensitive works

Activity/location	Timing	Duration	Responsibility
Clearance of bird nesting and (low) potential bat habitat to be found in individual stand-alone trees (i.e. T23 alder, any tree requiring pruning, and scrub elder around the silos). Nesting birds can be found in ground level and low scrub, such as is present on site.	Clearance should take place between the end of September – February. Tall ruderal vegetation should be cleared in stages; first to a height of approximately 30 cm then left for a period of 24 hours before removal to ground level. As a precaution, the ECoW should check areas before clearance begins as some birds may still be nesting in warmer weather. To avoid periods of activity by crepuscular, matutinal or vespertine fauna no works should take place before 0:800 am or after 17:30 pm.	Tree, tall ruderals and scrub removal and pruning will take place immediately prior to works.	Contractors, supervised by ECoW, Toolbox Talk to be given on the first day.
Clearance of tall ruderals, improved grassland areas to the site margins.	Clearance can take place at any time but the ECoW must dismantle and search any potential refugia piles by hand before works commence.	Tall ruderal/ brash/spoil heap removal immediately prior to works.	Contractors, after ECoW dismantling and hand search of potential refugia sites.

CONSTRUCTION ENVIRONMENT MANAGEMENT PLAN: BIODIVERSITY

Landscaping/habitat enhancement planting to the site borders and/or new wild area creation.	New planting should be undertaken on suitably prepared ground which has not been compacted by plant movement. New planting must be compensation for the loss of tall ruderals, a small number of grassy species, elder scrub and one mature tree, .	Where possible plant material specified to be supplied as root- balled or bare-root specimens shall be planted during the dormant season between late mid-November 2022 and the end of March 2023. Any evergreen shrubs should be planted in autumn of 2022 or early spring 2023 but avoiding the coldest winter months of December – February.	Developer and Contractors. ECoW should agree on a nominated person on site to monitor the after care of any new compensation and enhancement planting for one season.

2.5 The times during construction when specialist ecologists need to be present on site to oversee works.

An Ecological Clerk of Works must be present on site at the following times and during the following activities.

- Prior to works commencing to ensure that all protective fencing and exclusion barriers, including root protection areas are installed correctly and areas of plant and chemical storage and temporary infrastructure locations have been allocated and are clearly defined.

- On the first morning of works to deliver a Toolbox Talk to the site manager and contractual personnel and to ensure that the Method Statement is clear and available for contractual staff to refer to during the project.

- Immediately prior to the mechanical removal of any trees and elder scrub, and any tree pruning to check potential bat roost cavities in trees and hand search vegetation to ensure no small mammals, reptiles or amphibians are present. Where clearance or pruning continues over a period, the ECoW must re-check all proposed clearance areas anew on each morning before works.

- At the completion of landscaping and habitat enhancement areas to ensure that the correct species and ratios have been planted.

- Immediately prior to the last day of works to ensure that all important ecological features have been adequately protected during construction and that the development has provided proportional enhancement measures.

- If at any time a protected species is discovered on site when the ECoW is not present, then the ECoW should be contacted immediately for advice and all works to the discovery area must stop until the advice has been followed; in this instance, the ECoW may need to return to site.

2.6 Responsible persons and lines of communication

The developers of this site are …….and they are the persons responsible for ensuring this CEMP is adhered to throughout the specified duration of works.

The contractors for this site are to be confirmed.

The developer is directly responsible for ensuring that the development project is completed in accordance with current UK legislation concerning protected species.

The developer must liaise with the contractors to ascertain in advance any specific dates where ECoW attendance is required.

The contractors site foreman will be responsible for reporting to the ECoW if there are any unexpected ecological issues such as the discovery of a protected species during construction activities and must be responsible for reporting works progress to the supervising ECoW on at least a weekly basis.

The site foreman will be responsible along with the ECoW of the sighting and maintenance of all protective fencing and exclusion barriers.

All on-site contractual personnel are individually responsible for reporting any unexpected discovery of wildlife or any ecologically detrimental practice observed to the site foreman who must then report this to the ECoW.

2. 7 The role and responsibilities on site of an ecological clerk of works (ECoW)

The ECoW is responsible for the following:

- Along with the developer, the ECoW is responsible for ensuring all works on site comply with relevant legislation in relation to protected species and that the CEMP: Biodiversity is adhered to throughout the construction phase of development.
- Providing advice to developers and contractors on how best to minimise impacts on wildlife throughout the construction phase of development.
- Being the main point of contact should any issues relating to ecology arise during construction.
- Making the relevant people aware of any ecological issues that occur during the construction phase.
- Ensuring Toolbox Talks on protected species and sensitive habitats to contractors carrying out work within the site are undertaken.
- Ensuring supervision of any construction activities that have the potential to impact on protected species and / or sensitive habitats.
- Ensuring fence lines are monitored throughout the construction phase of development.
- Completing Daily Record Sheets of attendance on site where appropriate.

The ECoW must always be provided with any updated programme of works to determine watching brief requirements and associated ecological issues.

If the ECoW identifies any issues in relation to ecology or considers that the CEMP is not being adhered to during construction, the developer will be contacted and measures will be taken to resolve any issues.

If the developer or contractor identifies any ecological issues, the ECoW must be contacted for advice immediately.

2.8 Use of protective fences, exclusion barriers and warning signs.

Protective fencing/exclusion barriers will be in use on this site around the BPZ and RPA areas, where these areas overlap the greater distance from vegetation will be applied as the boundary.

These areas are as defined either in the text above or by the ECoW's interpretation of Plans 1, and these designated areas will be agreed and finalised on site prior to works by the contractors and the ECoW.

The fencing will not be installed within any RPA's or within 2m of any hedgerow line.

The fencing must be suitably robust and the contractual site foreman will have the responsibility of maintaining the fencing and ensuring areas within it are not breached by any personnel or equipment.

Suitable materials would be HERAS security fencing and Orange Tensar fencing (where boundary trees are far away from any construction areas). All waring and designation signs must be firmly fixed and weatherproof.

3 Appendix

3.1 Toolbox Talks to all contractors

TOOLBOX TALK 1 – Jeskyns Farm Proposed Office building –

Delivered to:

……

By S. Morgan CEcol, CEnv, Licence holder for bats, barn owls, Schedule I Birds, great crested newts, and dormice.

All contractors on site must be made aware of:

1. Their legal obligations with regard to the discovery of a Protected Species during works.

2. How to recognise bats and bat droppings, dormice, great crested newt, and other likely species potentially present.

3. That all trees liable to works or removal must for checked by an ECoW for the presence of bat species.

4. That bat species and their roosting sites are protected at all times, whether the bat is present or not.

5. That breeding birds are protected at all times.

6.The importance of contacting a licenced bat ecologist should bats or breeding birds, or any other Protected Species be found during works, and the fact that all work must stop on such an occurrence.

7. The procedure if a bat is found when an ECoW is not present on site:

- Phone the Licenced Bat Ecologist for the Site, never pick up or touch a bat without wearing gloves.
- In warm weather, active bats are likely to fly off promptly as a result of the disturbance, although bats generally do not appear to have a 'flight' response like birds and may stay in the roost site unwilling to move.
- Bats disturbed in cold conditions, when they are using torpor to conserve energy, will not move at all, and may appear dead.
- A bat in deep torpor can drops its heart rate to four beats a minute and may only take one breath a minute.
- Ideally, both active and torpid bats should be captured and transferred into shelter, such as a bat box fixed to a tree, in a safe area nearby.

- Where possible it is best to avoid bats flying off in the day as they may fall victim to birds of prey. However, if there are other trees nearby with suitable roosting opportunities they may already know of a suitable alternative roost site, although it is always advisable to try and track where they fly, because this may also be a site affected by the tree works.

- Where bats are found outside a roost they should be transferred to a suitable place of shelter as soon as possible.

- If they need to be retained temporarily until a licensed bat expert can arrive on site it is important to ensure that they are kept in a secure, quiet place that will not overheat and that the safety of the bats can be assured (e.g. from predators or from the general public) even though they may be unattended for a time while operations continue.

- Bats are very fragile, please handle them carefully, it is usually best to cover them with a light weight cloth, then using a gloved hand, pick them up, and place them in a receptacle which can keep them secure but still allow air for them to breathe.

- If there is going to be a significant delay (of over an hour) until the ecologist arrives then especially in hot weather it would be important to place water in with the bat – either by soaking a small amount of porous material – such as sponge, or by filling a tiny milk- carton top sized container and placing this in the receptacle.

- If possible, re-cover the bat or leave it alone, and work away from the area altogether, or if necessary, stop all work on site.

CONSTRUCTION ENVIRONMENT MANAGEMENT PLAN: BIODIVERSITY

TOOLBOX TALK 2 –Jeskyns Farm Office Building. General Site Ecology

Delivered to:
……

By S. Morgan CEcol, CEnv, Licence holder for bat, barn owls, Schedule I birds, great crested newts, and dormice.

All contractors on site must be made aware of:

Areas of tall ruderals may contain potential refugia sites for reptiles, amphibians, dormice, hedgehogs and other mammals; the site margins and scrub borders, are particularly likely opportunities for refugia sites.

Direct mortality of small mammals amphibians or reptiles during the construction phase can be avoided through implementation of Best Practice, including some of the following actions:

1. Be aware that the following protected species have been recorded within close proximity to this area and therefore may be present on this site at times:

Bats, breeding birds, reptiles, small mammals, (including multiple records for dormouse), amphibians, and badgers.

2. Always work within the specified time of year i.e. October- February to avoid impacts on breeding birds.

3. No clearance or ground works should commence prior to a hand search immediately before any mechanical vegetation removal and cutting operations.

4. Care should also be taken to ensure that no trenches or ground excavations are left open without a means of reptiles/hedgehogs/badgers being able to find their way out.

5. All piles of spoil, timber, or rubble should be kept clear of the ground, by removal either to a skip, or by being elevated, to ensure that potential refugia sites are not inadvertently created.

6. Any dug pits or unfilled deep foundation work should either be covered or have mammal ramps positioned in them to allow any trapped animals to escape.

7. Any brash and log piles on site should be searched by hand before removal and if hedgehogs are discovered that they be translocated to a suitable location.

8. Respect the protective fencing and exclusion barriers which are designated for wildlife protection and report any breech of these to the site foreman.

9. Unexpected discovery

If any protected species are discovered during the proposed works, all work must stop and advice should be sought from a suitably qualified ecologist to avoid inadvertently committing an offence.

3. 2 Method Statement

Amphibians, small mammals, badgers, reptiles and bats.

Development works at the site are likely to encompass a period between …….and ……to be complete by ……..with compensation.

All enhancement measures completed within 4 ……..months from completion (……).

It is a requirement that ecological supervision by an ECoW is provided onsite, via an appointed suitably qualified ecologist during any development works considered likely to have the potential to impact on breeding birds, amphibians, reptiles, small mammals, or bat species.

This ECOW presence should ensure that unforeseen issues can be resolved with clarity and minimal delays.

This Method Statement must be kept on site and available for viewing by all contractors together with wildlife identification sheets for bats, great crested newts, badger, small mammals and reptiles.

Prior to any development works beginning on site the developers/contractors will undergo a site induction/toolbox talk where the implications arising from the potential presence of protected species at the site.

CONSTRUCTION ENVIRONMENT MANAGEMENT PLAN: BIODIVERSITY

RAMS WORKING METHOD STATEMENT FOR JESKYNS FARM,GRAVESEND, KENT,FOR THE PERIOD ……to ……..and to be complete by ……..

Vegetation clearance; grass, trees (saplings), and scrub

1. Before any vegetation clearance and/or ground disturbance works commencing the extent of works will be agreed by the ECoW and the contractors.

2. Excluding T23, some light pruning of other trees to facilitate the removal of the dismantled silos, and the elder scrub within the silo compound area approved for removal prior to this document, all trees and hedgerows are to be retained. Please see Section Tree Works below.

3. Where vegetation removal/ works with the potential to disturb breeding is scheduled the ECoW or their accredited agent will carry out a nesting bird check on the proposed and immediately neighbouring areas of works.

4. If nesting birds are found to be present, it will be necessary to implement the most effective mitigation strategy (dependent on bird species) to prevent any disturbance to the nest site and the risk of committing an offence. This strategy may result in certain clearance works being delayed until the young have fledged.

5. To minimise the risk to amphibians, small mammals, and reptiles during vegetation clearance, strimmers, brush-cutters and/or side-mounted flail will be used to clear. This will prevent ground compaction and damage to areas of terrestrial habitat at the site which are to be retained. Where possible extract material using a forwarder rather than a skidder to reduce the risk of harm.

6. All vegetation removal works will be undertaken in two stages under the direct supervision of the ECoW to limit disturbance and allow animals to vacate the area. The stages will be a hand search, followed by a first cut to 30cm in height then, after a 24-hour rest period to allow any fauna to relocate, a further hand search and final cut to ground level.

7. Hand searching by the ECoW will proceed all removal by mechanical means; this includes any improved grassland areas and shrub borders.

8. The ECoW must re-check any trees which are to be subject to agreed works immediately prior to commencement of these operations; please see 'Works to Trees' below.

9. Immediately prior to works a search of any potential refuge sites within the development area will be carried out by the ECoW to check for sheltering amphibians and reptiles.

10. As deemed appropriate by the ECOW, items of potential refuge will be removed from the development site immediately following the search to prevent amphibians and reptiles seeking shelter beneath or within them.

11. The development site and any storage/lay-down areas will be kept clear of debris. Stored materials will be kept off the ground on stillages or pallets to prevent small mammals, amphibians and reptiles from seeking shelter or protection within them.

12. Any skips or bins should be stored on baulks of timber to keep them off the ground.

13. No dumping of rubbish or fires will take place within the site. Waste and brash piles must be placed in skips and removed from the site to prevent them becoming refugia for small mammals.

14. No plant machinery is to enter the BPZ areas or be kept on any but designated areas of the site.

15. No plant machinery must traverse or remain parked on undesignated areas.

16. Plant movement should be via existing or temporarily created hard standing areas, or on purpose built routes which have first been checked as suitable by the ECOW.

17. If earth spoil needs to be removed from the development site, it will be taken off-site at the earliest opportunity for appropriate disposal. Spoil will be spread across any of the site.

18. The ECOW will consider and advise the contractors on potential bio-security issues relating to the import and removal of material at the site and the need to undertake a bio-security risk assessment and/or implement measures to prevent the inadvertent spread of non-native species, disease and biological pathogens.

19. Any significant ground disturbance will be directly supervised by the ECOW.

20. No new waterbodies (storage tanks, ditches etc.) will be created on site during works.

21. No excavations be left open overnight they should preferably be back filled as works progress or covered over and provided with escape ramps. All excavations, even small trenches, must be searched and checked for sheltering amphibians and reptiles every morning if open during the preceding night. The search should be undertaken by the ECOW before works commence.

22. All open excavations should incorporate soil ramps at either end to allow any animals falling into them to escape.

23. Wherever practicable, excavations will be in-filled and made good to ground level at the earliest opportunity, to remove any hazard to reptiles and other animals.

24. Should spoil/materials be left on the ground overnight out of necessity, they may require searching for sheltering amphibians and reptiles by the ECOW before they are moved.

3.3 ECoW Report Form - Example

ANGLIAN ECOLOGY

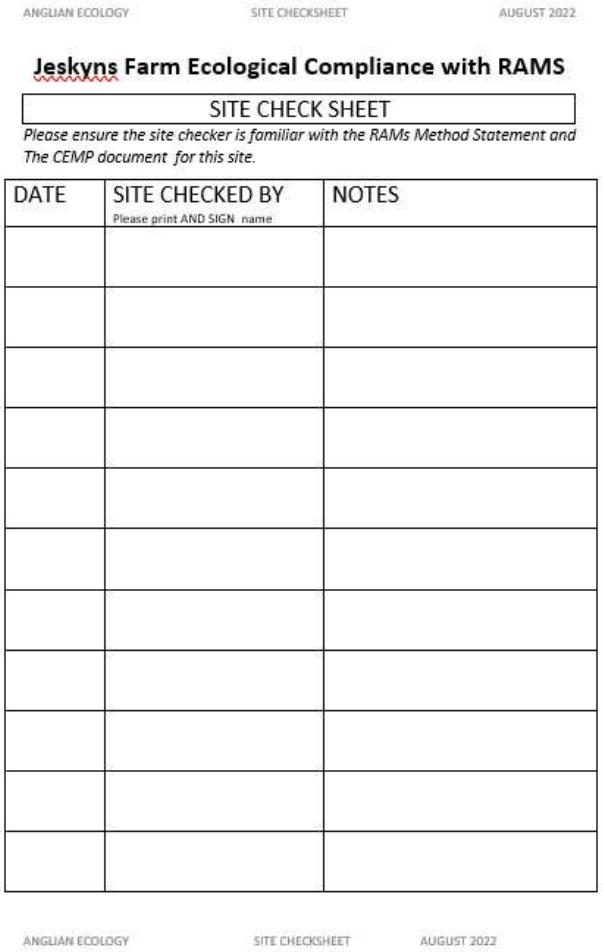
Sue Morgan CEcol, MCIEEM, CEnv, MIEMA
4, Red House Farm Cottage, Pixey Green, Stradbroke, Eye, Suffolk IP21 5NJ
Tel: 07753 406866

DAILY RECORD SHEET FOR ECOLOGICAL CLERK OF WORKS

Date		Time on site/Time left site:				
Weather conditions:						
ECoW/ surveyor						
Personnel on site:	Site Foreman:					
Protected species	Are protected species present or recorded on site?	YES		Were protected species encountered during works?		YES
If a protected species is found on site, all works to the immediate area must stop until an SQE[1] has been consulted. In any situation where an SQE is not present or unavailable, contact Natural England, or the local Wildlife Police Officer for advice.						
Description of Works:						
If required, please refer to accompanying site photographs and/or diagrams below for further clarification of the above. If protected species were encountered during works details must be supplied overleaf:						

[1] Suitably Qualified Ecologist

3.4 Sitecheck Form – Example



ANGLIAN ECOLOGY SITE CHECKSHEET AUGUST 2022

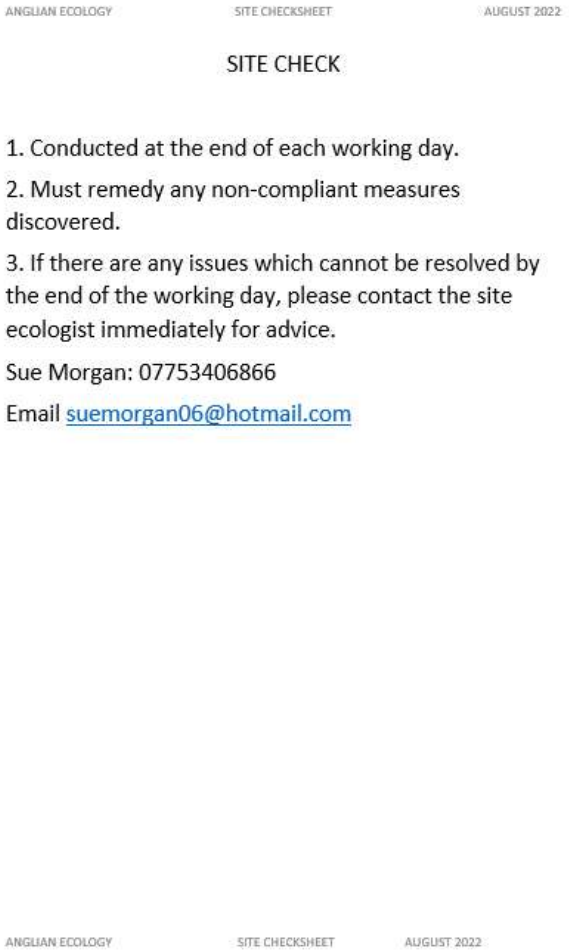
Jeskyns Farm Ecological Compliance with RAMS

SITE CHECK SHEET

Please ensure the site checker is familiar with the RAMs Method Statement and The CEMP document for this site.

DATE	SITE CHECKED BY Please print AND SIGN name	NOTES

ANGLIAN ECOLOGY SITE CHECKSHEET AUGUST 2022



ANGLIAN ECOLOGY SITE CHECKSHEET AUGUST 2022

SITE CHECK

1. Conducted at the end of each working day.
2. Must remedy any non-compliant measures discovered.
3. If there are any issues which cannot be resolved by the end of the working day, please contact the site ecologist immediately for advice.

Sue Morgan: 07753406866

Email suemorgan06@hotmail.com

ANGLIAN ECOLOGY SITE CHECKSHEET AUGUST 2022

3.5 Enhancement: Further new planting for invertebrates, breeding birds, and bat species.

Further enhancement for this site should be to incorporate native planting specifically for wildlife within landscape proposals, particularly plants and trees which fruit.

Suggested species for enhancing the sites biodiversity and compensating for the small loss of scrub and tall ruderals are listed below, and many commercial wildflower mixes are readily available for all soil types.

New planting could also take place around the perimeter, along the new driveway, and around the buildings. The benefits of this would be:

- Plant diversity attracts insects and other invertebrates (including butterflies, bees, spiders and millipedes), birds and mammals.
- Flowering species add a changing palate of colour to the environment throughout the seasons.

Berry and nectar rich plant species included within the planting scheme will increase foraging opportunities for invertebrates, small mammals, and birds. Increased invertebrate presence at the site will also result in greater opportunities for foraging bats. The landscaping should incorporate native and locally sourced tree and shrub species.

Native species are of greater value to local wildlife than introduced plants. The national charity Flora Locale (which ceased trading in 2018) produced an extensive resource library for wildflower planting which is now hosted by CIEEM[5] at https://cieem.net/?s=Flora+Locale

Soilscape's (England) Reference for the site is : 5 Name: FREELY DRAINING LIME-RICH LOAMY SOILS Main Surface Texture Class: LOAMY Natural Drainage Type: FREELY DRAINING Natural Fertility: LIME-RICH.

A combination of the correct tree and plant species is recommended below for inclusion within an enhancement planting scheme for the site which should seek to incorporate many of the suggested species below.

Please see suggested areas for mitigation and enhancement as designated on the QGIS satellite image below.

[5] Chartered Institute of Ecology and environmental Management

3.5.1 Enhancement/ mitigation plan



Proposed wildflower meadow	374.680 m²
Shrub planting	106.682 m²
Tree planting	5 mixed native species 90cm whips, staked and guarded.
Wildflower and grass species planting	125.276 m²

Grasses

Where grass areas are to be re-seeded it would be beneficial to local wildlife (especially reptiles and invertebrates) for the grass mix to be composed from a mixture of the species specified below[6].

10% Crested dogs-tail - *Cynosurus cristatus*

5% Smaller catstail - *Phleum bertolonii*

21% Sheeps fescue - *Festuca ovina*

25% Red fescue - *Festuca rubra*

25% Smooth meadow-grass - *Poa pretensis*

5% Common Bent-grass - *Agrostis capillaris*

1% Field scabious - *Knautia arvensis*

1% Lesser knapweed - *Centaurea nigra*

1% Self-heal - *Prunella vulgaris*

Trees

New planting of trees to compensate for the loss of one alder and some elder and to enhance the site further should contain a mixture of at least three from the following:

Bird cherry – *Prunus padus*

Alder Buckthorn –*Rhamus frangula*

Crab apple – *Malus sylvestris*

Whitebeam – *Sorbus aria*

Rowan (mountain ash) *Sorbus aucuparia*

Silver birch, *Betula pendula*

Hazel *Corylus avellana*

Juniper *Juniperus communis*

Elder *Sambucus nigra*

Wild Service Tree *Sorbus torminalis*

Hawthorn *Cratageous monogyna*

Wayfaring Tree *Viburnum lantana*

[6] Recommendations adapted from the Reptile Habitat Management Handbook (Edgar, Foster Baker, et al, 2010).

Shrubs

Shrubs should be planted to border areas around the new office building as well as along existing walkways, patios, and hardstanding areas.

The site should contain a mix of at least 8 of the following:

Field rose *Rosa arvensis*

Dog rose *Rosa canina*

Privet *Ligustrum vulgare*

Broom *Cytisus scoparius*

Sweet Briar *Rosa rubiginosa*

Guelder Rose *Viburnum opulus*

Honeysuckle *Lonicera periclymenum*

Hebe *'Midsummer Beauty'*

Buddleia *Buddleja davidii*

Flowering currant *Ribes sanguineum*

Musk Mallow *Malva moschata*

Guelder Rose – *Viburnum opulus*

An appropriate wildflower mix for a designated 'wild area' within the site would be one containing a mixture of the species below in which the ratio was at least 25% with non- competitive grass seed (from the grasses listed above), making up the remaining 75%.

Ox-eye Daisy *leucanthemum vulgare*

Rough Hawkbit *leontodon hispidus*

Knapweed *Centaurea nigra*

Corn Cockle *agrostemma githago*

White Campion *Silene alba*

Red Campion *Silene dioica*

Ladies Bedstraw *galium verum*

Self-Heal *Prunella vulgaris*

Meadow Buttercup R*anunculus acris*

Common Sorrel *Rumex acetosa*

Field Poppy *Papaver rhoeas*

Yellow Rattle *Rhinanthus minor*

Wild Carrot *Daucus carota*

Ribwort Plantain *Plantago lanceolata*

Corn Marigold *Chrysanthemum segetum*

4 References

Anglian Ecology Preliminary Ecological Appraisal Report Jeskyns Farm, Kent, October 2021.

Anglian Ecology Preliminary Bat Roost Assessment of 23 Trees and 12 Silos, Jeskyns Farm, Kent, March 2022

Institute of Environmental Assessment (1995). *Guidelines for Baseline Ecological Assessment*. E & FN Spon, London.

Bat Conservation Trust (2016) Bat Surveys – Good Practise Guidelines, 3rd Edition, Bat Conservation Trust, London

British Standards (2012) BS 5837:2012- Trees I Relation to Design, Demolition and Construction. Recommendations.

CIEEM Guidelines for Preliminary Ecological Appraisal (GPEA) (2013) Chartered Institute of Ecology and Environmental Management, Winchester, Hampshire.

CIEEM, Guidelines for Ecological Impact assessment in the United Kingdom (2006) Chartered Institute of Ecology and Environmental Management, Winchester, Hampshire.

Edgar P, Foster J, Baker J, et al, Reptile Habitat Management Handbook. (2010)

Forestry England Data Search courtesy of Daniel Cooper.

https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals

RSPB Standing advice August 2022

The British Standard BS 42020:2013, Biodiversity a Code of Practice for Planning and Development (BSI 2013).

REPORT ENDS

Appendix 4

Pre-application Advice

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Gravesham Borough Council

Pre Application Response Letter

Reference	PRE20210302
Site	Jeskyns Community Woodland and Greenspace, Henhurst Road, Cobham, Gravesend, Kent.
Proposed Development	The proposal is to create a purpose-built facility to support the operational forestry work of Forestry England in managing this site and surrounding parts of the forest estate by providing mess facilities and administration space of approximately 195m^2 of floor space.
Case Officer	Gary Edwards
Date of Advice	23 September 2021

I am writing with reference to your request for pre-application advice at the above site, received as valid on 15 July 2021. I apologise for the delay in responding.

You have requested advice relating to your proposal to create a purpose-built facility to support the operational forestry work of Forestry England in managing this site and surrounding parts of the forest estate by providing mess facilities and administration space of approximately 195m^2 of floor space.

I have now had a chance to look at the proposal in more detail and can offer the following comments:

Site Description

The site forms part of Forestry England's Jeskyns Community Woodland. It lies within the Green Belt and a rural area as defined on the adopted Gravesham Local Plan Core Strategy policies map.

Proposal

The information accompanying your submission describes the proposal as follows:

> *The proposal is to create a purpose-built facility to support the operational forestry work of Forestry England in managing this site and surrounding parts of the forest estate by providing mess facilities and administration space of approximately 195m2 of floor space.*

The proposed development is shown on the following drawings which accompany your submission:

- Jeskyns Location Plan (13 July 2021)
- Jeskyns Site Plan (13 July 2021)

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- Drawing no. FOR-PEV-01-00-DR-A-1200: Ground Floor General Arrangement Plan
- Drawing no. FOR-PEV-01-XX-DR-A-3100: Proposed Elevations
- Drawing no. FOR-PEV-12-00-VR-A-8002: Visual 3

Relevant Planning History

Application No.	Description	Status	Decision
20190508	Application for a non-material amendment to planning permission reference no. 20180962 to allow the change from compacted stone to un-compacted stone held within a mesh grid system.	Permitted	24.06.2019
20180962	Surfacing of existing overflow car park for permanent use including provision of landscaping and earth bunding; construction of wooden shelter to enhance the outdoor seating area of the cafe; construction of ranger office building; relocation of cafe store and bin store.	Permitted	23.11.2018
20131097	The reduction in height of 6 Poplar Trees and 3 Sycamore Trees located on boundary to Rookery Farm Barn to height of existing post and rail fence (approximately one metre).	Permitted	12.02.2014
20130524	Application for approval of conditions 3, 6, 7, 8 and 9 attached to planning permission reference number 20121097 relating to the external facing materials, landscaping of the building site and service access, lighting of the building, safety and security measures and boundary treatments.	Permitted	08.08.2013
20121097	Erection of a detached building to provide a cafe and wc's	Permitted	15.02.2013
20120026	Improvements to existing car park including upgrading of access roads and car parking area;	Permitted	01.05.2012

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	provision of two new parking bays totalling 13 car parking spaces with new access roads and formation of new overflow car park for approximately 100 vehicles for use for no more than 25 days per year.		
20060250	Circular 18/84 Consultation in respect of the the provision of recreational infrastructure involving new highway access and car parking; picinic area; ponds and wetland area and access for pedestrians, cyclists and horse riders in connection with the proposed community woodland and green space.	No objection	08.05.2006

Assessment

In your submission you have queried whether the proposed development would require a planning application or whether it would constitute "permitted development". This is addressed below under the following sub-headings:

- A) Permitted development
- B) Planning application

A) Permitted Development

Under the provisions of Class E of Part 6 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) certain forestry developments are considered to be "permitted development" and as such do not require the benefit of a planning application. The following extract from this Order sets out the circumstances in which forestry development would be considered to constitute "permitted development":

Class E – forestry developments

Permitted development

E. The carrying out on land used for the purposes of forestry, including afforestation, of development reasonably necessary for those purposes consisting of—

(a) works for the erection, extension or alteration of a building;
(b) the formation, alteration or maintenance of private ways;

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(c) operations on that land, or on land held or occupied with that land, to obtain the materials required for the formation, alteration or maintenance of such ways;
(d) other operations (not including engineering or mining operations).

Development not permitted

E.1 Development is not permitted by Class E if—

(a) it would consist of or include the provision or alteration of a dwelling;
(b) the height of any building or works within 3 kilometres of the perimeter of an aerodrome would exceed 3 metres in height;
(c) any part of the development would be within 25 metres of the metalled portion of a trunk road or classified road; or
(d) any building for storing fuel for, or waste from, a biomass boiler or an anaerobic digestion system would be used for storing waste not produced by that boiler or system or for storing fuel not produced on land which is occupied together with that building for the purposes of forestry

One of the conditions relating to such “permitted development” is that “the developer must, before beginning the development, apply to the local planning authority for a determination as to whether the prior approval of the authority will be required as to the siting, design and external appearance of the building or, as the case may be, the siting and means of construction of the private way”.

In order to enable the Council to determine whether your proposal constitutes “permitted development”, any submission for prior approval should also contain sufficient information to demonstrate that the proposed development is “reasonably necessary” for the purposes of forestry. In particular it will need to show that the building is required specifically for the forestry operations that take place within the site rather than for other non-forestry related activities such as the general management of the recreational facilities within the community woodland.

An application for such a determination can be made through the Planning Portal via the following link:

https://www.planningportal.co.uk/applications

B) Planning Application

If your proposal does not constitute “permitted development”, a planning application would be required. The relevant considerations are set out below.

Development Plan and other related Planning Policies and Guidance

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the Borough Council to determine planning applications in accordance with the development plan unless

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material considerations indicate otherwise. Where there are other material considerations, the development plan should be the starting point, and other material considerations should be taken into account in reaching a decision.

One such consideration will be whether the plan policies are relevant and up to date.

The Development Plan for Gravesham currently comprises:

- Gravesham Local Plan Core Strategy and Policies Map, September 2014; and
- Saved policies in the Gravesham Local Plan First Review, November1994.

The relevant policies for your proposal are as follows:

Gravesham Local Plan Core Strategy (September 2014):

- Policy CS01 – Sustainable Development
- Policy CS02 – Scale & Distribution of Development
- Policy CS11 – Transport
- Policy CS12 – Green Infrastructure
- Policy CS18 – Climate Change
- Policy CS19 – Development & Design Principles
- Policy CS20 – Heritage and the Historic Environment

Saved Policies in the Gravesham Local Plan First Review (November 1994):

- Policy T1: Impact of Development on the Highway Network
- Policy T5: New Accesses or Intensification of Use of Existing Accesses
- Policy P3: Vehicle Parking Standards
- Policy TC2: Policy for Listed Buildings

National Planning Policy Framework 2021:

- Section 2 - Achieving sustainable development
- Section 9 - Promoting sustainable transport
- Section 11 - Making effective use of land
- Section 12 - Achieving well-designed places
- Section 14 - Meeting the challenge of climate change, flooding and coastal change
- Section 15 - Conserving and enhancing the natural environment
- Section 16 - Conserving and enhancing the historic environment

Other Material Considerations

Supplementary Planning Guidance and other Documents:

The Council has adopted a number of Supplementary Planning Guidance (SPG) documents, Development Briefs and Conservation Area Appraisals. These elaborate on saved policies in the Gravesham Local Plan First Review and policies in the Gravesham Local Plan Core Strategy and are material considerations in determining planning applications.

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In addition, the Council has adopted a number of documents that have been produced by Kent County Council also as Supplementary Guidance.

https://www.gravesham.gov.uk/home/planning-and-building/supplementary-planning-guidance/supplementary-planning-guidance

The following documents are relevant to the consideration of this enquiry:

- Kent Design Guide (2006)
- SPG4 – KCC Parking Standards (2006)
- Landscape Character Assessment (2009)

Main Issues

There main planning considerations relating to this proposal are:

1. Is the proposed development appropriate in the Green Belt?
2. The effect of the proposal on the openness of the Green Belt
3. Design and visual impact
4. Impact on landscape
5. Impact on residential amenity
6. Highway issues
7. Heritage assets

These issues are assessed below:

Is the proposed development appropriate in the Green Belt?

The site is defined on the Policies Map of the Core Strategy as lying within the Green Belt and a rural area. In the consideration of this proposal, Policy CS02 of the Core Strategy is relevant. Development in the urban area is prioritised as the sustainable location for development. In the rural area, Policy CS02 states that development will be supported within rural settlements that are inset from the Green Belt and defined on the policies map. Development outside those settlements, i.e. in the Green Belt, will only be supported where it is compatible with national policies for protecting the Green Belt and policies in the Local Plan Core Strategy. This site lies outside the confines of any rural settlements inset from the Green Belt.

National policies for protecting the Green Belt are set out in Section 13 of the National Planning Policy Framework (NPPF). Paragraphs 147 and 148 are particularly relevant in the consideration of planning applications within the Green Belt:

> *147. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.*
>
> *148. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green*

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> *Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.*

Paragraph 149 of the NPPF states that a local planning authority should regard the construction of new buildings as inappropriate in the Green Belt unless it comprises one of a number of excepted forms of development including:

> *a) buildings for agriculture and forestry*
>
> *b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;*

As your proposal relates to a development required for forestry, it would comprise one of the excepted forms of development within the Green Belt as defined by section (a) above. Furthermore, if it were to be used in association with the general outdoor recreational use of the community woodland, it is also likely to comprise one of the excepted forms of development within the Green Belt as defined by section (b) above.

<u>The effect of the proposal on the openness of the Green Belt</u>

Paragraph 137 of the NPPF refers to the open character of Green Belts:

> *The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.*

Paragraph 149(b) of the NPPF (see above) also requires development defined within that exception to “preserve the openness of the Green Belt”.

One of the features of this locality is the openness and associated long views. The issue of how this openness would be preserved would need to be addressed in any planning application. This may include reference to the siting of the proposed building in proximity to other buildings and structures which would reduce its impact on the open character of the Green Belt. There may also be an opportunity for additional landscaping and planting to soften the impact of the building and limit its impact within the wider area.

In order to further ensure that the open character is protected, any planning application should demonstrate that the size of the building is reasonably necessary for the forestry operations carried out within the site and that it is not excessive in terms of the size of its floor area, height, scale and massing.

<u>Design and visual impact</u>

At a national level good design is one of the central requirements of the NPPF:

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> *The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.*
> (Paragraph 126)

The aims set out in paragraph 126 of the NPPF are reflected in Policy CS19 of the Council's Core Strategy. This requires new development to be "visually attractive, fit for purpose and locally distinctive" and to "conserve and enhance the character of the local built, historic and natural environment". It also requires new development to "integrate well with the surrounding local area". In addition, Policy CS19 requires the following:

> *"….the design, layout and form of new development will be derived from a robust analysis of local context and character and will make a positive contribution to the street scene, the quality of the public realm and the character of the area. Account will be taken of the scale, height, building lines, layout, materials and other architectural features of adjoining buildings."*

The building is of a functional design which would be consistent in appearance with an agricultural or other rural building. The submitted drawings indicate that the building would be clad in larch timber cladding and corrugated metal sheet cladding. It would also appear that the roof would be finished in corrugated metal sheet. These materials are considered appropriate for a building within this location.

The proposed design and appearance of the building is considered acceptable and would not have a harmful impact upon the visual amenity of the wider locality. As such it is considered that in these respects it would meet the tests set out in the NPPF and Policy CS19 of the Council's Core Strategy.

Notwithstanding this conclusion, any planning application would still need to address the separate issue of the effect of the proposal on the openness of the Green Belt as set out above.

Impact on landscape

Section 15 of the NPPF highlights the importance of conserving and enhancing the natural environment, one aspect of which is the protection and enhancement of valued landscapes. Policy CS12 of Gravesham Local Plan Core Strategy states that the overall landscape character and valued landscapes within the Borough will be conserved, restored and enhanced and that proposals will take account of the Gravesham Landscape Character Assessment.

In light of the considerations set out above under the heading "design and visual impact" it is considered that there would be no material harm to the local landscape or conflict with Section 15 of the NPPF or Policy CS12 of the Core Strategy.

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However, it is again important to emphasise that, notwithstanding this conclusion, any planning application would still need to address the separate issue of the effect of the proposal on the openness of the Green Belt as set out above.

Impact on residential amenity

Paragraph 130 of the NPPF requires planning decisions to, *inter alia*, provide "a high standard of amenity for existing and future users". In addition, Policy CS19 of the Core Strategy requires new development to be located, designed and constructed to "safeguard the amenity, including privacy, daylight and sunlight, of its occupants and those of neighbouring properties and land".

There would be a significant separation distance between the proposed building and nearby residential properties. As a result of this, it is unlikely that the proposed development would result in a loss of amenity to nearby occupiers in terms of loss of privacy, loss of daylight/sunlight or loss of outlook.

Highway issues

Policy CS11 of the Core Strategy requires that new developments "should mitigate their impact on the highway and public transport networks as required" There is also a requirement for new development to provide sufficient parking "in accordance with adopted parking standards which will reflect the availability of alternative means of transport and accessibility to services and facilities".

Saved Policy T5 of the Gravesham Local Plan First Review (November 1994) requires that the formation of new access or the intensification of use of existing accesses will not normally be permitted except where no danger would arise.

Saved Policy P3 of the Gravesham Local Plan First Review (November 1994) requires development to make provision for vehicle parking in accordance with the Kent County Council Vehicle Parking Standards.

Any future planning application would need to demonstrate that any extra traffic movements generated by this proposal would not impact upon highway safety and would be acceptable in terms of the intensification of the existing access serving this part of the site. It would also need to show provision for sufficient on-site car and cycle parking to serve the building. The use of the proposed building does not fall conveniently within any of the uses set out in the Kent County Council Vehicle Parking Standards. Any future application should therefore be accompanied by information which justifies the level of proposed parking provision based upon the nature of the use of the building.

Heritage assets

Section 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 199 requires that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation.

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Policy CS20 of the Core Strategy places a high priority on the preservation, protection and enhancement of the Council's heritage and historic environment. Policy TC2 of the Gravesham Local Plan First Review 1994 sets out the Council's approach to applications affecting listed buildings. It states that in the case of applications for development affecting the setting of listed buildings, the primary consideration of the Borough Council will be the maintenance of the integrity of the original listed building.

The following listed buildings are located in the vicinity of the proposed building:

- Jeskyns Court
- Jeskyns Court Granary

Both are Grade II Listed Buildings. Given the separation distance between these buildings and the proposed new building, together with the existence of intervening buildings, it is considered that the proposed new building would not impact upon the setting of these listed buildings.

Summary

This letter sets out those circumstances where the proposed building may be considered "permitted development" and the requirement to apply for a determination as to whether prior approval is required for specified matters.

If the development does not constitute "permitted development", a planning application would be required. The most relevant issues for consideration are discussed in this letter and would need to be addressed in any formal submission.

If planning permission is sought, an application can be made through the Planning Portal, here:

https://www.planningportal.co.uk/applications

Please be aware that should you wish to submit an application it must be compliant with local and national validation requirements. You can find the requirements at

https://www.gravesham.gov.uk/__data/assets/pdf_file/0007/922633/Local-List-of-Validation-Requirements-full-list-ADOPTION-1-April-2020.pdf

You are advised that **PRE20210302 is now closed**.

Note: The comments contained herein are offered on an informal basis and without prejudice to the determination of any subsequent planning application. The Borough Council reserve the right to add to or amend the comments in the light of any further information coming forward or matters that were not previously considered.