

Technical Note on the Ecological Appraisal of Alexandra House Radar Tower Works

Project Name: Alexandra House Radar Tower Works

Project Owner: James Palmer, Head of Civil Engineering, Port of London Authority

Background

The Port of London Authority (PLA) has been granted planning permission by Gravesham Borough Council for the redevelopment of the Port Control Centre. As part of a planning application to Gravesham Borough Council (ref: 20221294), the radar tower on the roof of the Port Control Centre (PCC) must be relocated to the roof of the building immediately adjacent, Alexandra House (AH). This is imperative to ensure continuity in radar coverage, therefore maintaining navigational safety on the tidal Thames.

Gravesham Borough Council approved the planning application for the redevelopment of the Port Control Centre in April 2023, with the following condition:

3. *Prior to the commencement of the development approved by this planning permission the provision of an up-to-date preliminary ecological appraisal and enhancement opportunities shall each be submitted to and approved, in writing, by the Local Planning Authority. Enhancements should follow the principles of net gain as set out in the Department for Environment Food and Rural Affairs 3.0 metric and follow the National Planning Policy Framework (2021) with particular reference to paragraphs 179-180.*

Reason: To ensure the protection of wildlife and supporting habitat. Also, to secure opportunities for enhancing the site's nature conservation value in line with national planning policy in accordance with Policy CS12 of the Gravesham Local Plan Core Strategy (2014) and section 15 of the National Planning Policy Framework (2021).

The PLA are applying to partially discharge this condition by addressing the requirement to carry out a preliminary ecological appraisal prior to commencement of development. The new radar tower is to be constructed offsite and then erected and assembled on site. This work is planned to take place during October/November 2023.

The PLA's Technical Advisor for Ecology carried out a walkover survey of the buildings for their suitability to support roosting bats, following the guidance set out in CIEEM Guidelines for Preliminary Ecological Appraisal¹ and the BCT Good Practice Guidelines² on 24th August 2023. The technical summary of this survey is set out

¹ CIEEM (2017) *Guidelines for Preliminary Ecological Appraisal*, 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester

² Collins, J. (ed.) (2016), *Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd Ed.)*, The Bat Conservation Trust, London

below, this includes recommendations for further ecological appraisals prior to commencement of development.

Technical Summary

Date of visual survey: 24/08/2023

Attendees: Kelda Hudson, Technical Advisor Ecology & Dan Johnson, Civil Engineer

Location: Alexandra House, Royal Pier Road, Gravesend, DA12 2BG

The PLA's Ecology Technical Advisor carried out an inspection of the roof of Alexandra House to determine the need for further, species-specific surveys, on 24th August 2023. This ensures compliance with relevant legislation (Wildlife & Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017) and with the conditions of the extant planning consent.

Bats

Following the principles in the BCT Guidelines, the roof and associated structures and the surrounding habitat were assessed for their habitat suitability for bats to roost, commute, and forage.

The roof and associated structures were categorised as having **negligible** potential to support roosting bats because:

- The building is maintained in good structural condition (intact pointing, no gaps in brickwork etc.);
- The building has a flat roof with bituminous covering, with no access points; and
- The only access points into the building are via ventilation louvres into machine rooms, which are unlikely to be suitable for roosting bats because of noise.

In addition, the roof is easily accessible from inside the building and there are offices overlooking the roof that will increase light levels.

The surrounding habitat was classified as having **negligible** habitat features for foraging and commuting habitats:

- There are few trees and/or vegetation in the local area;
- Alexandra House is directly next to the Thames estuary, which is a sub-optimal habitat for bats

The categorisation of the Alexandra House and surrounding habitats as having negligible potential to support roosting, foraging and commuting bats is supported by a bat survey carried out on Royal Terrace Pier (immediately adjacent to Alexandra House). This 2022 survey categorised the pier and surrounding habitat as having negligible potential to support roosting bats. There was no evidence of the presence of bats in either survey.

The radar tower is proposed to be installed in October/November 2023, which outside of the most active season for bats. Therefore, the installation of the radar tower is unlikely to adversely affect bats.

Breeding Birds

The PLA's Technical Advisor for Ecology did not observe any active birds' nests during the inspection of the roof of Alexandra House. The radar tower will be installed in October/November 2023, which is outside the bird breeding season and therefore the works are unlikely to pose a risk to nesting birds.

Recommendations

1. The radar tower can be erected without the need for additional ecological appraisals at this stage.
2. The PLA's Technical Advisor for Ecology can be available to advise the Civil Engineering team during installation, if required.
3. A toolbox talk can be given to site personnel prior to commencement of works by the PLA's Technical Advisor for Ecology, if required.
4. If any protected species are discovered, works will immediately stop and ecological advice will be sought.
5. A Preliminary Ecological Appraisal of the Port Control Centre including potential enhancement opportunities will be carried out prior to commencement of development on that building.

Technical conclusion

Alexandra House and surrounding habitats was categorised as having negligible potential to support roosting, foraging and/or commuting bats. Therefore, the erection of a new radar tower on its roof is unlikely to adversely affect bats. The works will be carried outside of the bird breeding season and therefore are unlikely to adversely affect nesting birds.

Signed by: Grace Rawnsley



Date: 04/09/2023

Signed off by: Grace Rawnsley, *Director of
Sustainability and Net Zero Transition*

Appendix: Photographs & Drawings



Figure 1: Aerial view of Alexandra House



Figure 3: Alexandra Roof House (looking W)

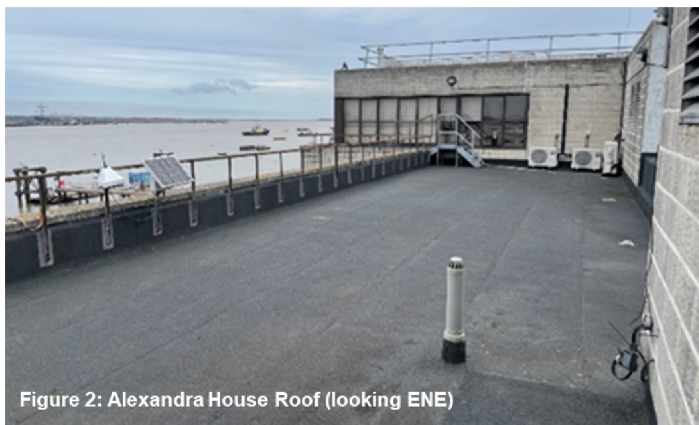


Figure 2: Alexandra House Roof (looking ENE)



Figure 4: Alexandra House Roof (looking E)

Date: 04/09/2023

Signed off by: Grace Rawnsley, *Director of
Sustainability and Net Zero Transition*

