



4<sup>th</sup> July, 2019

Ms. H. Chapman  
Hume Planning  
Innovation House  
Discovery Park  
Sandwich  
Kent  
CT13 9ND

By Email

Dear Holly,

**Re: MC/19/0765 Land at East Hill, Chatham, Kent – Ecological Responses by KWT and KCC**

This letter is in response to the comments provided within the letter from Kent Wildlife Trust (KWT) on the 10<sup>th</sup> May 2019 and the Ecological Advice Service reply by Kent County Council (KCC) on the 31<sup>st</sup> May 2019.

The points raised by KWT for further information are in relation to:

- Farmland Bird Mitigation
- Roadside Nature Reserve
- Capstone Farm Country Park
- Ancient Woodland

The points raised by KCC for further information are in relation to:

- Ground nesting bird habitat
- Priority habitat chalk grassland
- External lighting design
- Dormouse mitigation

**Ground Nesting Breeding Birds/Farmland Bird Mitigation**

KCC and KWT both agreed with the assessment that within the current proposals there would be an overall loss of habitat for skylark. The recommendation from KCC and KWT was that the habitats available within the Site would not be sufficient and off-site mitigation/compensation would be required.

The land owner Mr. Attwood and planners Hume Planning Consultancy Ltd have agreed that off-site mitigation/compensation can be provided within the surrounding arable fields with 11 skylark plots created.

Skylark plots are bare patches in winter cereal fields designed to help skylarks forage. These skylark plots consist of 16m<sup>2</sup> areas (approximately 4m x 4m) at a density of 2/ha within an arable field which are left undrilled or sprayed out, to provide areas of shorter vegetation during the breeding period.

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*Director: H G Wrigley (née Lucking) BSc. MIEEM, BES*

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VAT Reg No. 862 2486 14

### **Priority Habitat - Chalk Grassland**

A Construction Environmental Management Plan (CEMP) will be drafted and agreed in advance of the works taking place.

The method for any translocation of vegetation and soils would be provided within this document. The area to be lost is currently dominated by dense successional scrub and young trees, albeit that it is on chalk base and some small patches of grassland can be seen to support chalk species, with a vehicle track within the center of this area having chalk grassland present. Of the total 978m<sup>2</sup> area to be lost for the proposed access road, approximately 100m<sup>2</sup> is chalk grassland track and the rest is dominated by scrub.

In addition to this habitat translocation the land owner Mr. Attwood has agreed that the field shown on the attached plan will be taken out of arable use and be returned to grassland as a mitigation/compensation area, this field is 1.3ha in size.

Previous surveys of this area in 2017 and early 2018 during a fallow period of a few years, recorded a suite of chalk grassland plants present prior to being returned to an arable crop in late 2018 and 2019. This area would be returned to grassland, with the underlying chalk conditions and existing seed bank for chalk species it is considered that chalk grassland will develop here without seeding but with appropriate management this area would redevelop and be managed and maintained as a chalk grassland mitigation area. A detailed mitigation strategy and long-term management plan would be created for the restoration of this field.

### **Ancient Woodland**

As set out in the ES a minimum 15m protection buffer zone to the two areas of Ancient Woodland will be provided. This buffer does extend further with sections of the buffer being 30m wide in places for both woodland blocks. The buffers are to be planted with appropriate woodland scrub planting to create a vegetated buffer between the development and the woodland. Pathways will also be created through and around these areas to limit the impact on the ancient woodland.

A Construction Environmental Management Plan (CEMP) will be drafted and agreed in advance of the works taking place in order to protect the two areas of Ancient Woodland during the construction phase from direct or indirect impacts such as lighting dust and damage. This will also include exclusion fencing to prevent unauthorized access into these buffer zones.

A Landscape and Ecological Mitigation and Monitoring Plan (LEMMP) will be created which will incorporate a long-term management plan for the Ancient Woodland area to ensure the woodland is not degraded during the operational phase of the development, this will focus on preventing unauthorised entry into these areas. The LEMMP will include the following:

- a) Purpose and conservation objectives for the proposed works;*
- b) Review of site potential and constraints;*
- c) Detailed method statements to achieve stated objectives for each species;*
- d) Extent and location/area of proposed mitigation for all species on appropriate scale maps and plans;*
- e) Type and source of materials to be used where appropriate, e.g. native species of local provenance;*
- f) Timetable for implementation demonstrating that works are aligned with the proposed phasing of development;*
- g) Persons responsible for implementing the works;*
- h) Details of initial aftercare and long-term maintenance;*

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- i) Details for monitoring, reporting and remedial measures;*
- j) Details for disposal of any wastes arising from works; and,*
- k) Details and locations of bird and bat boxes and retention of cordwood on site.*

### **Dormouse Mitigation**

Within the ES we recognised that human activity and increased cat predation may lead to adverse impacts to dormice during the operational phase of the development.

As set out in the ES mitigation, measures to limit human impacts will involve the installation of fencing to prevent the unauthorised access to mitigation areas as well as information packs and boards provided to highlight the importance of dormouse within the local area.

Barriers to cat movement such as high and close mesh fencing often prove detrimental to birds and small mammals, especially hedgehogs and are often not very successful. Mitigation for the prevention of cat predation is limited to the planting of dense, spikey vegetation such as blackthorn and hawthorn which can provide a natural barrier to cats but still be used by birds and mammals, this in parallel to the significant increase in suitable dormouse habitat across the Site can mitigate for cat and increased predation. The details of the fencing locations, the planting and long-term management of the planting to ensure the scrub is maintained and does not become gappy and over mature will be set out in the LEMMP.

### **External Lighting**

To address potential impacts on biodiversity, a Lighting Strategy will be prepared and submitted to the Local Planning Authority for review. The Strategy will include the principles of the lighting design as well and the provision of a detailed plan identifying the key areas across the Site for sensitive lighting for wildlife and that will remain dark. This Strategy will be incorporated into both the CEMP and LEMMP to prevent impacts from lighting during the construction phase and operational phase of the project. A plan showing light sensitive areas based on the activity heat maps provided within the detailed bat survey report is attached (Figure 2). These areas have been identified as the most sensitive for bats and the lighting strategy will keep lighting to a minimum in these areas.

### **Capstone Farm Country Park**

KWT has raised the issue of potential negative impacts of the proposals on habitats within Capstone Farm Country Park through increased use, particularly on Priority grassland habitats. The Country Park was created in 1984 and was designed for use by local residents rather than for biodiversity reasons. Prior to this the whole area consisted of arable farmland and orchards. Nonetheless there are now areas of higher ecological interest within the Country Park including areas of grassland.

Within the proposed development there are areas of open green space with paths and amenities for use by residents, which are designed to complement and link to the adjacent Country Park. Approximately 8ha of publicly accessible greenspace (i.e. excluding areas which will be planted for dormouse mitigation) has been provided within the proposed layout.

However, the applicant has confirmed (as set out above) that as an additional compensation measure, the field shown on the attached plan (Figure 1) extending to approximately 1.3ha to the east of Capstone Road, will be taken out of arable production and returned to grassland. The aim is to create an off-site biodiversity area specifically for the creation and management of chalk grassland. This area will have no public access to prevent degradation. The management of this area will be included within the LEMMP and as such will require the same level of monitoring to ensure that the management is resulting in the appropriate biodiversity enhancements.

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### **Roadside Nature Reserve**

The Roadside Nature Reserve was initially outside the area surveyed and is outside the land ownership and management of the applicant. However, the area was included within the invertebrate surveys with additional records of plant species recorded during these surveys. In addition, surveys of the adjacent field margins provided protected species data for these areas in particular dormice and reptiles.

The Roadside Nature Reserve is designated for a range of chalk grassland indicator species and, as recorded within the ES, is good for invertebrates. However, the habitats within this area have become heavily scrubbed up and are developing as secondary woodland (particularly from Shawstead Road and to the south). Near to White's Wood secondary woodland has developed over all but a narrow strip along the visibility spay of the road. The section adjacent to North Dane Way, north of the Shawstead Road, is also under some threat from invading woodland and scrub, although during the 2018 surveys there were signs that this area was under a cyclical cutting management to control this invading scrub.

Whilst the proposed new access roads will result in the loss of small areas of the RNR, approximately 0.28ha in total, large areas of mitigation is proposed across the Site including chalk grassland creation and restoration including a 1.3ha field to the east of Capstone Road and areas amounting to over 0.5ha within the Site to be created. A methodology for the translocation of any lost chalk grassland will be outlined within the CEMP strategy and the long-term management of these areas will be within the LEMMP.

The long-term management of this RNR is, however, outside the jurisdiction of the developer and is the responsibility of the local authority.

Kind regards,

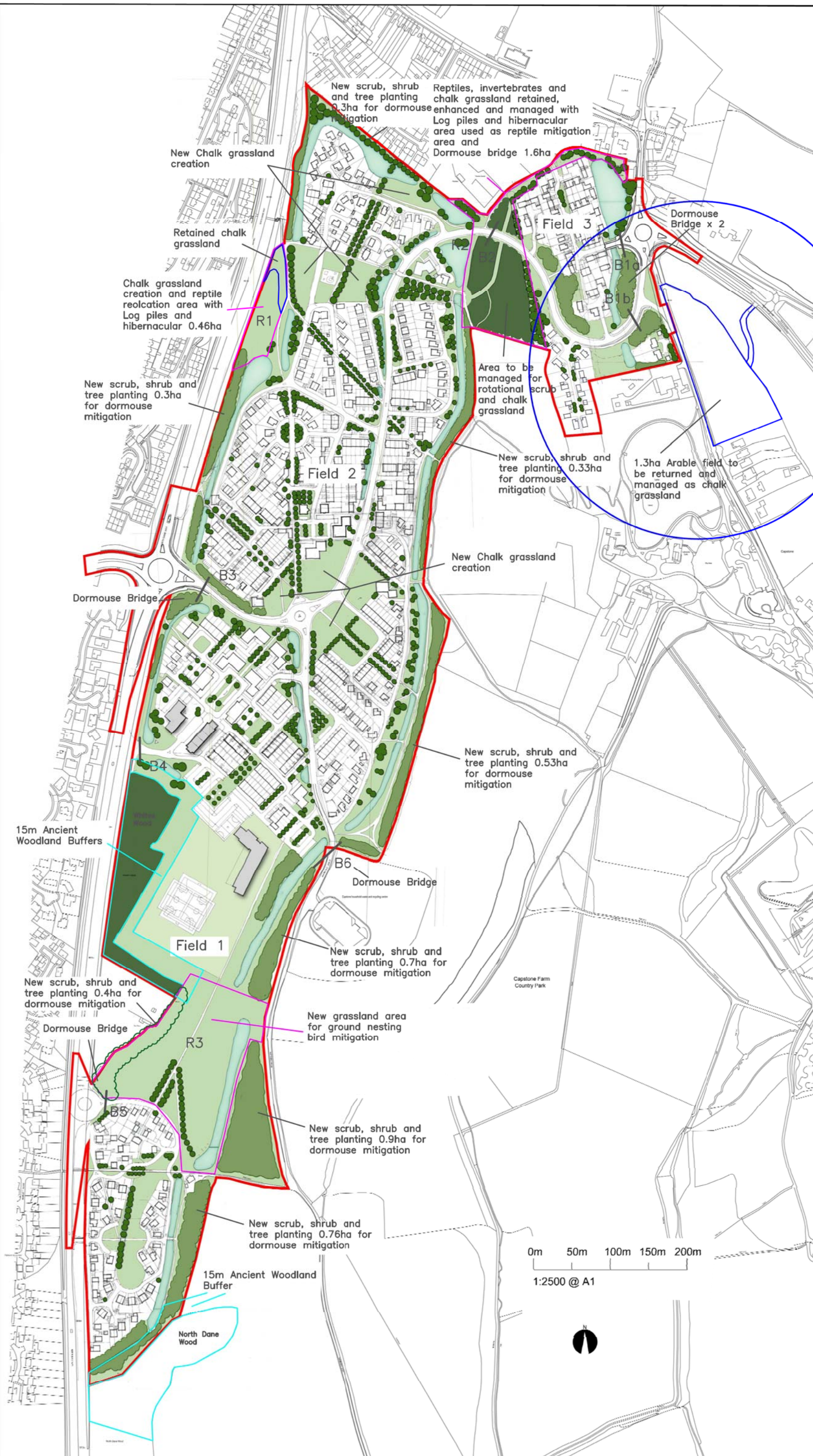
Alexander Watkinson  
**Senior Ecologist**

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- Key**
- Proposed New 1.3ha Mitigation Area
  - Site Survey Area
  - Road
  - Built Environment
  - New Planting
  - Swale/SuD/Attenuation Basins
  - New scrub, tree and shrub planting
  - Ancient Woodland with 15m buffer zones
  - Significant Effect Area
  - Receptor Area R1
  - Dormouse Bridge Location B1

0m 50m 100m 150m 200m

1:2500 @ A1



revision	description	date	checked by

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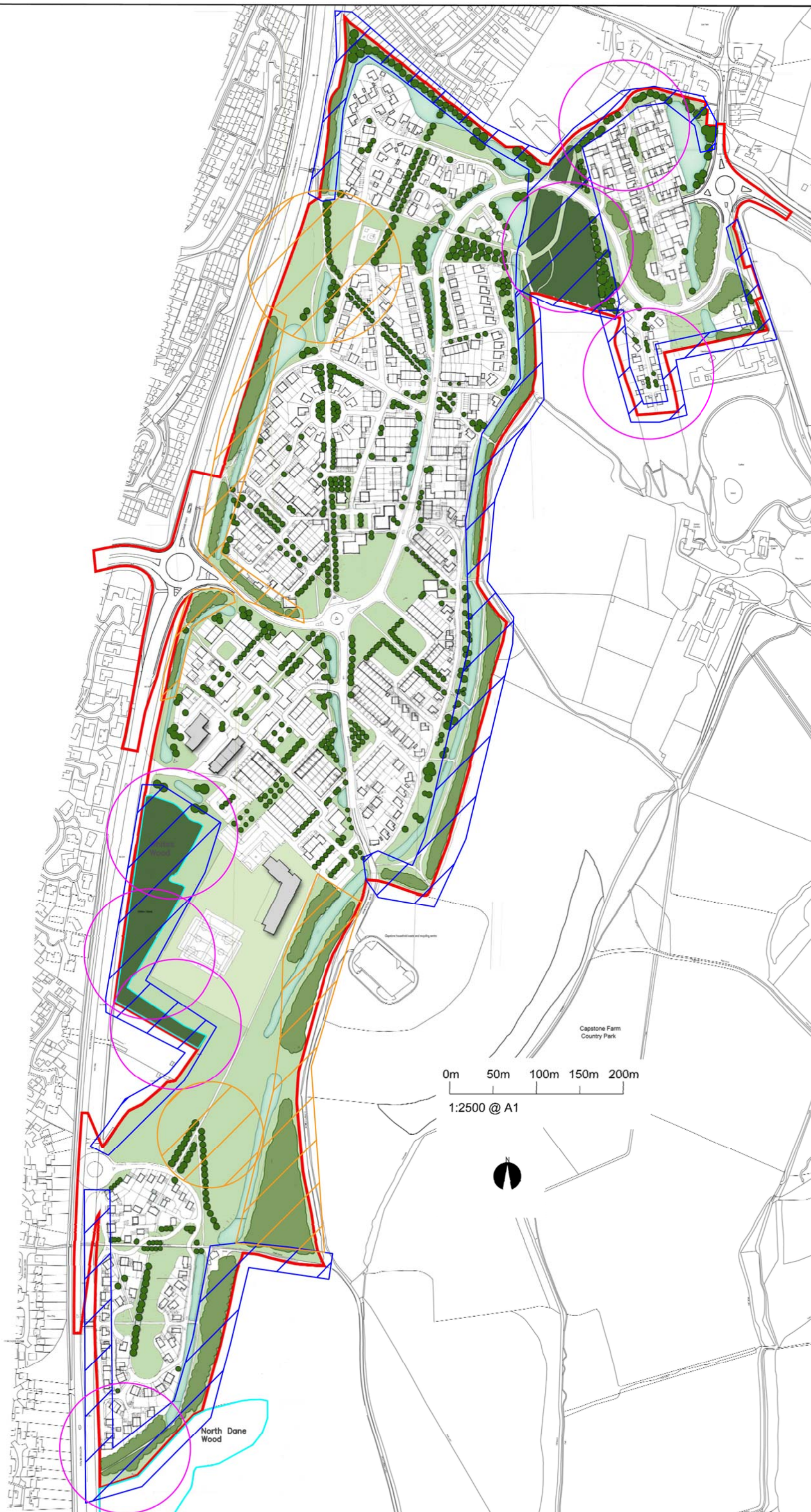
**Project:**  
17032 East Hill, Hempstead

**Title:**  
Mitigation Overview Plan

**Figure 1**

scale	size	date	drawn	checked
NTS	A3	01.04.2019	AW	HL

CAD filename: Figure\_1.dwg



- Key
- Site Survey Area
  - High Levels of Bat Activity
  - Areas of existing vegetation to have minimal light levels
  - Areas of new vegetation and habitats to have minimal light levels

0m 50m 100m 150m 200m  
 1:2500 @ A1



revision	description	date	checked by

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**Project:**  
17032 East Hill, Hempstead

**Title:**  
Sensitive Lighting Plan

status		drawing no. <b>Figure 2</b>		
scale	size	date	drawn	checked
NTS	A3	28.06.2019	AW	HL

CAD filename: Figure\_1.dwg