

BGNB RESIDENTS' ASSOCIATION 2013

LITTLE CHALVEDON HALL FARM: WILDLIFE EVALUATION

Bowers Gifford and North Benfleet Residents' Association:

Assessment of outline planning documents and external data, relating to the impact on wildlife on Little Chalvedon Hall Farm (13/00140/OUT)

Document: Application Form (No Personal Data).

Page number	Comment
Page 2. Section 4.	The address of the site provided, detracts from the fact that the site is actually a working farm. Technically the site is "Little Chalvedon Hall Farm" (LCHF). Little Chalvedon Hall is the traditional Farmhouse which is located on the farm, and which these plans will demolish.
Page 7. Section 16.	Clause A has been signed declaring " <i>None of the land to which the application relates is, or is part of, an agricultural holding.</i> " The Residents' Association (RA) believe this to be an incorrect declaration. The site has a long agricultural history; former owner Mr Acres farmed the land for many years but let it to Mr Lambert, a local Cattle Farmer, when he became ill. Mr Lambert currently leases the site from the present owner and farms cattle on the site.

Document: Sitecheck by Argyll Environmental.

Page number	Comment
Page 1. Paragraph 3.	<p><i>"No site inspection, further enquiries or investigation of surface or ground conditions has been carried out by Argyll Environmental. No information as to the age, value and type of property has been made available. It is important to note that it is not known by Argyll Environmental for what purpose the report has been commissioned."</i></p> <p>The RA question how accurate and reliable this report is, if a neutral body has not been able to visit the site to collect data independently. Furthermore, the context as for what purpose this report is being created must surely need to be known by the author as this could affect the conclusion – for example recommendations may differ greatly if this site is to be used as a farm versus a housing development.</p>
Page 5.	<p>Ramsar sites may not be within 500m of the site, but there are two very important Ramsar sites in close proximity to LCHF which the RA feels deserve consideration. Benfleet and Southend Marshes (3UK071) which meets Ramsar criterions 5 and 6 and is approximately 3.26KM from LCHF.</p> <p>Thames Estuary and Marshes (3UK141) which meets Ramsar criterions 2,</p>

	5 and 6, is approximately 1.88 KM from LCHF.
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Document: Pound Count APP 6.1 PDF.

Page number	Comment
Row – Pond 10.	The Great Crested Newt Count for pond 10 is stated in the penultimate column as being “29”. However, if you add up the individual recordings in the proceeding columns you will see it is actually 33.
	It is important to note that the Pond Count data provided does not include recordings of frogs or toads, which the RA knows to exist on the site.

Documents: Pound Count App 6.1 PDF and Pond Count App 6.2 PDF.

Page number	Comment
	The RA notes that the 6 surveys were carried out within a period of 4 weeks and 2 days (despite the site being in the current owner’s possession for over two years to date). Therefore, the data cannot be seen as entirely reflective of the pond wildlife present on the site. Particularly, as the breeding period for Newts is as follows ¹ and is also greatly dependent on climate: Smooth newt: early April - early August Palmate newt: early April - early August Great Crested Newt: March – July. (Up to 300 eggs are laid singly and attached to the leaves of water plants). ²
	The data also shows that ‘bottling’ and ‘netting’ were techniques used to record data. While all native British Amphibians are protected under the <i>Wildlife and Countryside Act 1981</i> , Great Crested Newt (GCN) is protected further as a threatened species. Consequently, a licence is required from English Nature to capture them, even for survey work such as this ³ . While the data shows numerous GCN were bottled as part of this survey, the licence details which allow the surveyor to do so have not been provided.
	While the <i>Master Plan</i> for the site sees the ponds retained, they will become isolated from one another and the surrounding habitats and secluded locale of the ponds will be destroyed. The applicant recognises

¹ <http://www.rspca.org.uk/utilities/faq/-/question/ENQWADBreedingSeasonBritishFrogsAndNewts>

² <http://www.marinebiology.co.uk/freshwater-life/newts>

³ <http://www.marinebiology.co.uk/freshwater-life/newts>

	<p>the negative impact this will have on the wildlife, particularly GCN, and that this factor cannot be mitigated⁴. Typically, male newts leave the ponds at the end of the breeding season and hibernate under stones or rocks. GCN live in scrub, woodland and undisturbed grassland from October to February⁵. The woodland and undisturbed grassland which currently surrounds the ponds will be destroyed. As GCN are a threatened species, it is illegal to intentionally kill, injure, possess or disturb the animals or to damage their habitat; these plans would do precisely that.</p>
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Document: Woodland and Hedgerow Plan FIG 6.5.

Page number	Comment
	<p>This document highlights the many established hedgerows present on the site, the majority of which are ‘important hedgerows under hedgerow regulations 1997.’ The RA feels these hedgerows are even more important as much of the area’s woodland has already been lost. Increasingly animals use this hedgerow in the same way they would use woodland. Moreover many birds, particularly songbirds such as Skylarks, use the neighbouring open grassland to feed but then seek refuge from predators in the hedgerows.</p>
	<p>The hedgerows are also home to foxes, badgers, hedgehogs and dormice, to name but a few species, which rely on the neighbouring open grassland to feed and then return to their Earth, Sett or dens in the hedgerow for protection, warmth and to hibernate. The proposed development will see buildings erected very closely adjacent to the hedgerows, destroying the animal’s environment which is currently free from noise and light pollution. The construction period will be particularly harrowing and could see animals driven out of the site to try and find new homes. Many of these animals will not survive the local busy roads and would have to travel for miles to find a similar environment to the one they have now. Moreover, the <i>Environmental Statement Scoping App 1.1 Public</i>, suggests fencing to keep reptiles within the hedgerows however, the RA proposes this will have a negative effect on other animals which leave the hedgerow to find their food.</p>
	<p>If you cross reference the <i>Woodland and Hedgerow Plan Fig 6.5</i> with the <i>Bat Activity Plan Figure 6.2</i> you will see that the area of the highest bat activity is at the centre of the site and is focused around the existing important hedgerows on the site. This area enjoys little light pollution; something the proposed development will destroy. The hedgerows are</p>

⁴ Environment Statement Scoping App 1.1 Public page 33.

⁵ <http://www.marinebiology.co.uk/freshwater-life/newts>

	<p>vital for the bats' survival, which is particularly noteworthy as bat numbers have deteriorated, internationally and nationally, in the past century; building development being the primary cause. Declining bat numbers in the UK can be directly attributed to the destruction of hedgerows. These bats roost in the holes and hollows of mature hedge trees, and feed on the countless insects that hedges attract⁶.</p>
	<p>Cross referencing <i>Woodland and Hedgerow Plan FIG 6.5</i> with the <i>Environmental Statement Scoping App 1.1</i> the applicant recognises that the site provides a significant area of hedgerow-rich mixed farmland within the context of Basildon District⁷. Nevertheless the applicant will be destroying the farmland and while they foresee the damage to wildlife being mitigated by retaining many - but in reality not all - of the existing hedgerows⁸; the RA has strove to prove the hedgerows will no longer be able to be utilised by the wildlife in the way they presently are, as there will be a dramatic increase in pollution and human activity close-by. The hedgerows will no longer be able to support the same diversity and quantity of wildlife (which includes protected species), if the neighbouring open grasslands are erased and replaced with dwellings, concrete roads and pollution. The hedgerows are home to a rare and comprehensive lifecycle. The leaves and plant form attract invertebrates, which in turn attract animals such as dormice and toads, which in turn attract carnivorous species such foxes and adders. To lose the hedgerow is to lose the important wildlife that it supports.</p>

Document: Bat Activity Plan fig 6.2; Bat Activity Plan fig 6.3; Environmental Statement Scoping App 1.1; Environmental Statement Public

Page number	Comment
	<p>It is clear from these documents that there is a high level of bat activity on the site, including at least four different species of bat and several roosts. The application documents assign a District value to common Pipistrelles using the site and Local value to the other three species using the site⁹. Cross referencing these documents with the <i>Master Plan 2.pdf</i> and the <i>Environmental Statement Scoping App 1.1 Public</i>, it is apparent that these bats will be greatly disturbed as their current roost in the farmhouse will be destroyed. The low level of light pollution currently enjoyed by the bats</p>

⁶ <http://www.lboro.org/~wwatch/Infopages/Hedgerowfactsheets/hedgerowanimals.htm>

⁷ Environmental Statement Scoping App 1.1 Public page 33.

⁸ Environmental Statement Scoping App 1.1 Public page 31.

⁹ Environmental Statement Public page 86, para 6.4.57

	<p>will also be destroyed as houses and shops take over the open grassland they currently use to forage. While <i>Environment Statement Scoping App 1.1</i> concedes that some bats will be lost and habitat destroyed, it proposes that suggested measures will have an eventual positive effect on the bat population. The RA disagrees with this conclusion. "Replacement bat roosting features in buildings will be designed-in wherever possible"¹⁰. There is no guarantee however that these features will be included nor that the bats currently present on the site, will take to the new roosts – that's if they survive the demolition of the farmhouse. Moreover, the current bat population has taken years to establish in the current roosts and if destroyed, it may be several years before bats return to the site. The scrubland and parkland that are proposed within the site represent half the open space the bats currently use to forage; what's more the hedgerows bats currently use to nest will be adjacent to newly built properties and will therefore suffer from light pollution. The parkland and scrubland will be opened up for public access bringing far greater human activity to the site than the current few footpaths offer. The RA therefore feels the proposed development will have a negative effect on the locally important bat population on the site.</p>
<p>Environmental Statement Public page 67.</p>	<p>The RA questions the number of surveys carried out. Only one tracking and two transect surveys being carried out shortly after the current owner took ownership of the site, this does not represent a comprehensive representation of the bat activity on the site.</p>
<p>Environmental Statement Public page 83.</p>	<p>This document heavily references the applicant's environmental report - referring the reader to SES (2011f). This is cited on page 121, as an unpublished survey on the Land at Little Chalvedon Hall by Southern Ecological Solutions Ltd. The RA questions how a report can be heavily referenced - implying a high degree of importance - yet be withheld from the reader. Surely this prevents the reader from making a balanced and well-informed conclusion on the proposed development. This survey apparently details the evidence of bat roosts and potential roosts amongst other things.</p> <p>Some of the references to this report include:</p> <p>The numerous semi-mature and mature ash, oak and crack willow trees many of which were found to have potential bat roosting features, particularly woodpecker holes and evidence of bat presence for all trees or close groups of trees with bat roosting potential. The crack willow in the garden which is due for felling, houses a bat roost home to 2 Pipistrelles.</p> <p>6.4.55 States that roosts are considered to be of "conservation significance in the Local context".</p>

Document: Environment Statement Scoping App 1.1 Public

¹⁰ Environmental Statement Scoping App 1.1 Public page 32.

<p>Page 1 – 1.4 and Page 4 – 2.17</p>	<p>“Whilst the development scheme is less than the threshold of 1,000 dwellings as comprising development where significant environmental effects are likely the EIA is submitted on a voluntary basis by Meridian Strategic Land to enable the development proposal and its implications for the local environment to be fully understood.” The RA question the voluntary nature of the EIA as the initial plan appears to be for 800 dwellings, but with the view to extend the development to some 1300. This is supported by various maps supplied in the application, including the one in Appendix 2 of this document which shows houses built directly behind Westlake Avenue. Also documents <i>Masterplan Layout 6.6</i> and <i>Masterplan 2 PDF</i> both show large areas of open space labelled as ‘Interim Public Open Space’ which suggest the applicant has the ambition to build on these areas also, taking the development total to over the 1000 dwelling threshold. In paragraph 2.17 of this document the applicant explicitly states “it is anticipated that development of the site will be phased over a period of about 7 years with the option for a subsequent phase to increase the overall capacity of development to about 1,300 dwellings .” This would also mean the data provided in this application would be inaccurate for the maximum development and the EIA therefore, is mandatory. The RA is particularly concerned on this matter with regards to the effect on Wildlife.</p>
<p>Page 4 – 2.6</p>	<p>The RA would like to draw your attention to one of the initial points in this document, the incorrect signing of <i>Section 16 Clause A</i> on the application form. Paragraph 2.6 of this document confirms the site is actually a farm, although it doesn’t extend to say it is currently a working cattle farm.</p>
<p>Page 6 – 2.26</p>	<p>The applicant highlights the Coalition Government’s change to the ‘<i>National Planning Policy Framework</i>’ (NPPF) suggesting that where plans (such as the Core Strategy) are not in place, then developments should be permitted. Whilst the RA recognises Basildon District Council does not currently have an approved Core Strategy in place, it concludes that these plans do compromise the principles of sustainability. Not least because, they pose a threat to wildlife – much of the animals present on the site are native British species which are either protected or at threat of extinction. Furthermore, the site is a working cattle farm providing food to meet the local and national demand. Food is more essential than housing for sustaining the population.</p>
<p>Page 8 – 3.5</p>	<p>Confirmation that the conclusions and data provided are based on 800 dwellings despite the site potentially comprising of 1300.</p>
<p>Page 14 – 3.50 and Page 15 – 3.55</p>	<p>“The proposed development has the potential to generate noise and vibration during site preparation and construction. Residential development, and the type of employment uses envisaged once occupied are not anticipated to be a significant source of noise or vibration, although additional road traffic has the potential to increase noise levels.” Increase in noise pollution and vibration is a certain, not potential, risk during the construction period, with HGVs, heavy plant machinery and numerous construction workers inundating the site. This will be a danger to much of the wildlife presently attracted to the site by its little light and noise pollution. In particular newts, bats, badgers and hedgehogs (principally those hibernating) require peace and quiet. Once completed the development will still generate noise which, contrary to the applicant,</p>

	<p>the RA believe will be significant. A development of 800 dwellings housing at least 1360 people (based on 1.7 persons per household) will generate significant noise as residents: play music, wash cars, carry out DIY, use lawnmowers, watch television, and drive vehicles. The development will also attract greater traffic to the local area posing a further threat to all local residents.</p>
Page 34	<p>“Compensation for the loss of terrestrial habitat will be provided and it is considered that a minimum of 14.2ha of land should be set aside for GCN compensation. This land will be within the 17ha of available land on the western edge of the development...” The RA questions this figure. <i>Master Plan Layout Fig 6.6</i>, states that the ‘accessible open land’ (labelled CC and DD) to the west of the land only amounts to 11.3 ha. ‘Interim POS’ amounts to 10.38 ha but as parkland with many users, this will not be suitable replacement habitat for much of the wildlife, especially GCN. Furthermore and as already explained, it is quite possible that this open space will not be a permanent feature of the site if the applicant extends to 1300 dwellings, hence it’s labelling as ‘interim’. Consequently replacement habitat for GCN will be below 14.2 ha.</p>
Page 34	<p>Little Chalvedon Hall Farm is a ‘key reptile site’, as the applicant themselves recognises. While they recommend reptile fencing to mitigate the negative effects on the site’s reptiles, this will not completely solve the issue and many will die or be injured by increased vehicle traffic loss of foraging space and potential prey being less present on the site. Female adders can travel for several hundred metres to find a suitable location to lay their young¹¹ with open spaces being lost on the site this journey will become more hazardous and the suitable breeding locations will be harder to find.</p>

Further comments.

The RA would like to highlight that there are discrepancies between several of the maps provided as to the actual layout and development of the site. Documents *Masterplan Layout Fig 6.6.pdf* and *Master Plan 2.pdf* concur however, the map in appendix 2 of *Environment Statement Scoping App 1.1 Public* which is also titled ‘Master Plan’, shows development directly adjacent to the existing dwellings in Westlake Avenue, in addition to further dwellings in the North West and South West of the site which are not shown on the previously referenced documents. This wildlife evaluation has been based upon *Masterplan Layout Fig 6.6.pdf* and *Master Plan 2.pdf*, however if *appendix 2 of Environment Statement Scoping App 1.1 Public* is the correct master plan then it is suffice to say that on all accounts, the negative impact on the site’s wildlife will be even greater.

¹¹ <http://www.forestry.gov.uk/forestry/Adder>

Environmental Statement Public Report

Paragraph 6.4.62 states that, the most significant of thirty-six bird species using site (in conservation terms) are nine bird species of Conservation Concern (BoCC). Four of these are red listed species. One is BAP/section 41 and amber listed, and 3 other are amber listed. The RA feels this is an important fact to highlight.

Appendix One

From the application documents it is clear that the applicant has given little consideration to invertebrates, nor have they supplied counts for birds, all amphibians or reptiles. Jewel Beetles have been found present on the site and the RA believe the diversity of wildlife to extend far beyond that discussed in the planning application. Therefore, the RA submits in strictest confidence to Basildon District Council a wildlife count undertaken by the *Essex Field Club*. Please note that this document must not be passed onto any third parties without the prior approval of the *Bowers Gifford and North Benfleet Residents' Association* and *Essex Field Club*.